



Dulwich College Shanghai Puxi

# Safeguarding Policy

This policy was written by the DCI Director of Safeguarding and the DCI Designated Safeguarding Leads and is subject to annual review and final approval by the DCI Executive Committee.

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

The DCI Director of Safeguarding will ensure compliance with this Policy across the DCI Group of Colleges and Schools.

Updated: August 2019



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## Rationale

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 policy describes how we fulfil this duty and sets out the responsibilities of DCI and every DCI school for safeguarding and promoting the welfare of all our children. It includes policy provisions 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, gap students, 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) and the British Schools Overseas (BSO) standards.

Safeguarding is central to all that we do in our College and is a standing item on all meeting agendas.

The principles that underpin our commitment to Safeguarding are as follows:

- The safety and wellbeing of children comes first
- Everyone who works with children has a responsibility to keep them safe. DCI commits to ensuring all those who work with children receive appropriate safeguarding training.
- Every child has a right to feel safe and our child-centred approach is modelled on the [United Nations Convention on the Rights of the Child](#)
- We support the needs of the individual child and recognise that some children are potentially more vulnerable than others, e.g. children with AEN, disabilities, looked after and previously looked after children.

### Indicators of Abuse and Neglect (also see Appendix A)

In our DCI colleges and schools, our indicators of abuse and neglect are adopted from the [Keeping Children Safe in Education 2018](#) DfE statutory guidance for Schools and Colleges and include:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect



## Our Commitment to Safeguarding

At Dulwich College Shanghai Puxi we have a commitment to upholding the principles of safeguarding as outlined by this policy.

The key roles and responsibilities across the DCI Group and within the College are outlined at Appendix B.

The College has a Safeguarding Working Party made up of representatives from each area of the College, including the Safeguarding Lead, the Child Protection Officer(s) (CPOs) and the Lead Trainer. The chair of this working party will report directly to the Head of College. The role of the group 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

The chair of this group will be a member of the DCI Safeguarding Working Party. This group will meet at least once a year to review DCI policy and recommend updates.

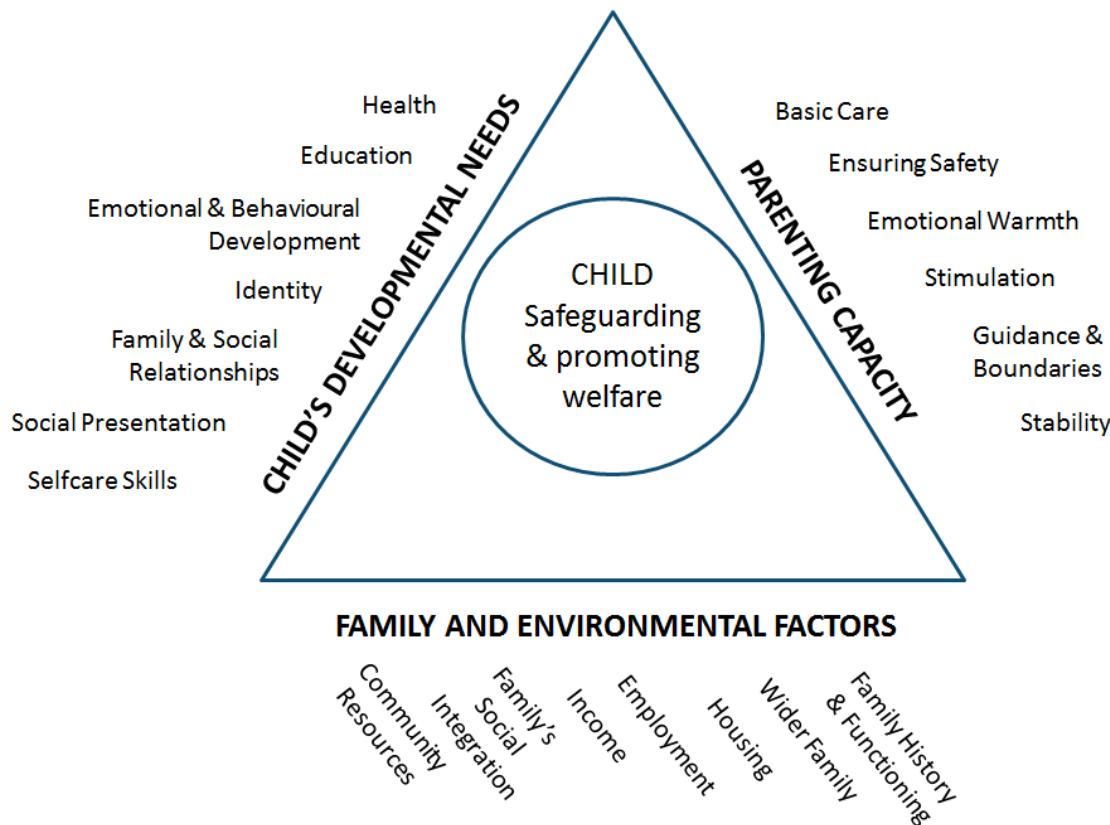
Within our College the following have specific safeguarding roles:

Role	Person
DCI Director of Safeguarding (Board of Management Representative)	John Todd (john.todd@indulwich.com)
Head of College / Director	David Ingram (david.ingram@Dulwich-shanghaiminhang.cn)
Designated Safeguarding Lead	Gary Polglaze (gary.polglaze@Dulwich-shanghaiminhang.cn)
Deputy Designated Safeguarding Lead	Christine Haslett (Christine.Haslett@Dulwich-shanghaiminhang.cn)
Child Protection Officer	Christine Haslett (Christine.Haslett@Dulwich-shanghaiminhang.cn)
Deputy Child Protection Officer	Kelly King (kelly.king@Dulwich-shanghaiminhang.cn)
Support Staff Child Protection Officers	Chris Zhang (chris.zhang@dulwich-shanghaiminhang.cn)
Safeguarding Lead Trainer	Sasha Leaver (sasha.leaver@dulwich-shanghaiminhang.cn)
E-Safety Lead	David Ingram (temporary) (david.ingram@Dulwich-shanghaiminhang.cn)



## Managing Concerns About Children

In our colleges and schools, we take a systematic approach to managing concerns, as set out in the following model:



From UK HM Government, "Working together to safeguard children (March 2015)"

Concerns are defined in two categories:

- Child Protection Concerns – where the child is at significant or immediate risk of harm
- Safeguarding Concerns – where the child 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 John Todd, the DCI Director of Safeguarding.



## 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 children and their families when early signs of any challenges to a child'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. See Appendix C.

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

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

All staff should be aware that safeguarding issues can manifest 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 and sexual harassment;
- sexting (also known as youth produced sexual imagery); and
- initiation / hazing type violence and rituals.

*Keeping Children Safe in Education 2018 p.15*

Each College ensures that regular learning opportunities are created to minimise peer on peer abuse. They also ensure that children 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 and Stay Safe* programme. Individuals will be supported through the pastoral system.

## Reporting or Recording Concerns About a Child

All adults, including staff, volunteers, interns, gap students, contractors, consultants, board members, guests and visitors must report concerns immediately, maintaining confidentiality and reporting immediately to their identified CPO or Deputy CPO in their absence. They will be asked to record their concerns on the Confidential Record of Concern form (available from the CPO). See Appendix C.

The CPO will also record and manage any such concerns about safeguarding and peer on peer abuse (see Appendix D). Such concerns 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'.

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 child. Staff will be expected to ensure that any reports written about any safeguarding situation are child-centred, in the child'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 make-up of the team will depend upon the nature of the situation. The team will take a holistic approach, addressing the child's needs within their family, the college or school, the wider community and the local or international context.

The College 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 Director of Safeguarding who may consult with a member of the DCI legal department.

Decisions made by the response team should be agreed with the child and family where possible. A clear process of evaluation with a clear timeframe will be recorded along with the impact of any change on the welfare of the child.

## Confidentiality

The College and all members of its staff will ensure that all data relating to children 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 process outlined in this document, 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 child and / or the child'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 child is at immediate or significant risk of harm, has a duty to forward this information without delay to the CPO. 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.

## Transferring Safeguarding Files

When a child with an active safeguarding file moves to another school, we have 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 in which they are operating. Where the legal position is not clear and so schools should make a phone call rather than transfer documentation. If there are any child protection issues you **must** make the call and record the fact that the call was made in the student file, the date and time of the call, who the call was made to, their position in the school and the nature of the communication.

If there is a significant issue to report, there is a duty to call and make the issue known to an appropriate person which should be the Head or the DSL; it would not be appropriate to leave information with a secretary or more junior member of staff.

Our first duty is to protect the child (students come first) and if in doubt it is better to make the call and raise a concern than to worry later that you did nothing. Further advice may be sought from the DCI Director of Safeguarding.

- Files should be kept permanently and securely
- Student files should not be transferred to other schools
- You may make (or offer to make) calls to schools and update the new school on any safeguarding issues

## Safeguarding Training Strategy

The College has a Safeguarding Training Team consisting of: Sasha Leaver and Chris Zhang



- Two lead Safeguarding Trainers (one fluent in English, and one fluent in Mandarin) 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 they meet the required DCI Safeguarding Competencies (Appendix E)

Please see Appendix B for 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 will be kept in a designated central location on Sharepoint.

Training materials are also available through [www.educare.co.uk](http://www.educare.co.uk) Logins are available through the schools HR Department.

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

Training is evaluated at the end of each academic year to inform future development.

## Staff and Volunteers

### Safer recruitment

To ensure that children 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***.

### Volunteers and visitors

We recognise that some people who may be unsuitable for working with children may use volunteering as an opportunity to gain access to children. 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 at Appendix F; 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 at no time have unsupervised contact with children. They must also sign the Volunteer Safeguarding Statement.

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.

### Contractors

The College will ensure that all the companies they work with provide evidence of police checks and that any contractors are supervised on site and given appropriate training.

## Professional and Personal Conduct of Staff and Volunteers

The College has a duty to ensure that professional behaviour applies to relationships between staff and children, and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. All staff will sign the ***DCI Safeguarding Code of Conduct*** at Appendix F.





## Use of Reasonable Force

On a rare occasion, a staff member may have to make a physical intervention to a child that is not expected. Members of staff should only do this:

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

*Examples of such situations are:*

- *A child attacks a member of staff, or another child*
- *Children are fighting*
- *A child 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 child is or appears to be under the influence of alcohol or illegal substances*
- *A child absconds from school (this will only apply if a child would be at serious risk if not kept in school)*

Physical intervention can take a number of forms. It might involve staff:

- Physically interposing between children
- Blocking a child's path
- Leading a child by the arm
- Shepherding a child away by placing a hand in the centre of the back or (in extreme circumstances) using more restrictive holds, including holding, pushing and pulling

Specific adults will be trained to restrain any child who may require physical intervention as part of an individual care plan.

Due regard should be given to the College's Safe Touch policy. This policy should also address safe touch in areas such as PE, music, dance, drama, outdoor education, etc where adults may need to touch children as a normal part of their duties to help with posture or positioning. In such cases, specific briefings should be given by the appropriate Head of Department and a record kept of this. Wherever possible, children should be notified that touch is going to happen.

## 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 child or another adult, the DCI procedure for managing allegations will be followed as outlined in **the DCI Management of Safeguarding Concerns and Allegations about the Conduct of Staff Policy**.

## 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 children 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 children.
- To prevent a problem from becoming more serious.
- To protect or reduce risks to other children 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 his absence, the DCI Director of Safeguarding, John Todd or the Director of Schools, Marc Morris.
- If a concern is expressed about the Head of College, it should be referred to the DCI Director of Safeguarding, John Todd or the Director of Schools, Marc Morris.

### 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 employer 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.

### 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 children in the College.

### 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.

## Retention of Files

All file documentation relating to concerns about a child or adult will be kept indefinitely and stored separately in a fireproof safe.

## Prevent

The Prevent Duty places a 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 context in which it operates in determining to what extent the Prevent Duty should be implemented. Appropriate information about Prevent is part of the DCI training content.

## Digital Safety

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

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

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

Staff are expected to take photos of children 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.

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

## **Homestays**

The College does not offer homestays for students.

## **Annual Safeguarding Reviews and Audits**

In Term 1, the College will be reviewed by the DCI Director of Safeguarding using the DCI Safeguarding Compliance Review protocol. Any action arising from this will be incorporated into the school's Safeguarding Action Plan.

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 colleagues working with the DSL. 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 Director of Safeguarding

The Safeguarding Working Party, chaired by the Safeguarding Lead, will review the action plan at three meetings per year. The Safeguarding Lead 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.



## Safeguarding

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

## 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 Safeguarding Competency Framework
- F. Safeguarding Code of Conduct
- G. Volunteer Safeguarding statement
- H. Visitor Safeguarding statement
- I. Flow chart *reporting a concern about a child*
- J. Flow chart *managing allegations reporting about an adult*
- K. Head of College / Director checklist (for reference only)
- L. DCI Safeguarding Compliance Review protocol
- M. DCI Internal Audit protocol