SAFEGUARDING POLICY & PROCEDURES			
DCI Policy Code	-	Applicable To	Whole College
DCI Policy Area	Safeguarding	Approval By	DCSPD CLT
Responsibility (DCI)	John Todd	Last Review Date	May 2019
Responsibility (local)	Neil Crossland	Next Review Date	May 2020

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Dulwich College Shanghai Pudong

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: May 2019

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 Pudong 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.

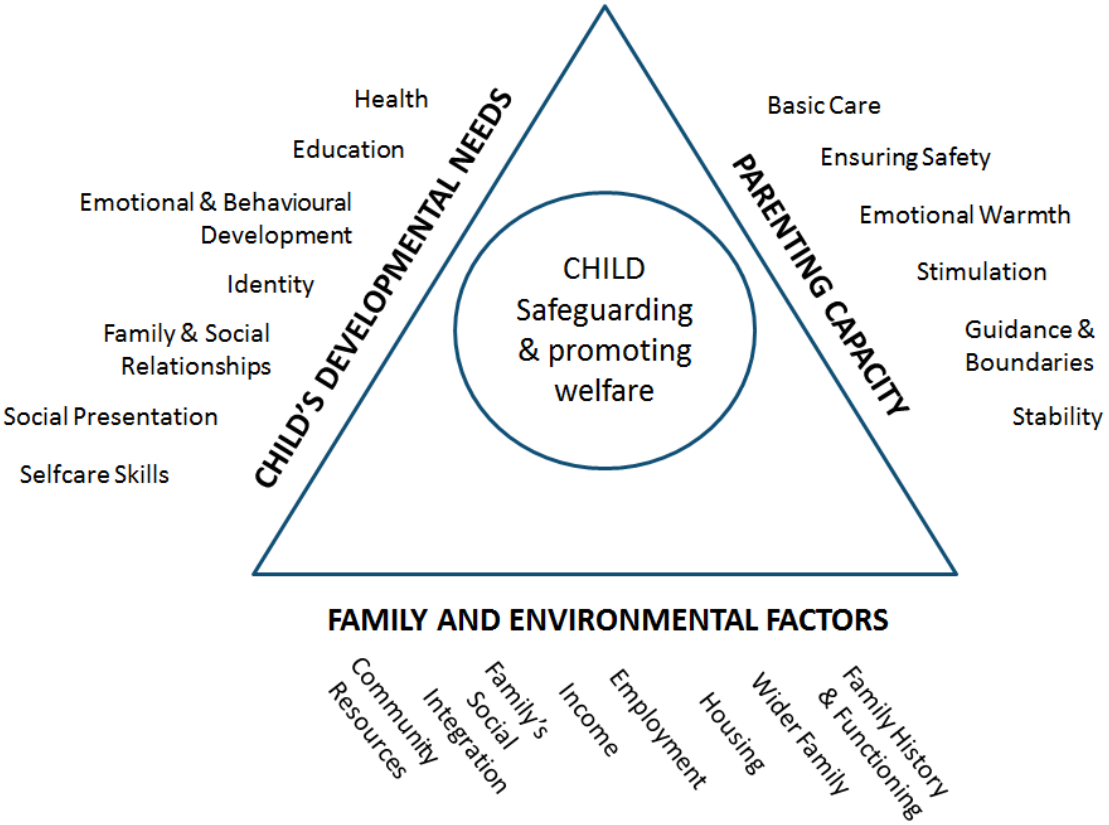
Within our College the following have specific safeguarding roles:

Role	Person
DCI Director of Safeguarding (Board of Management Representative)	John Todd (john.todd@indulwich.com)
Head of College / Director	Caroline Taylor (Caroline.Taylor@dulwich-shanghai.cn)
Designated Safeguarding Lead	Neil Crossland (Neil.Crossland@dulwich-shanghai.cn)
Deputy Designated Safeguarding Lead	Victoria Foster (Victoria.Foster@dulwich-shanghai.cn)
Child Protection Officers	Craig Jenkinson (Craig.Jenkinson@dulwich-shanghai.cn) Victoria Foster (Victoria.Foster@dulwich-shanghai.cn) Katherine Weir-Davis (Katherine.Weir-Davis@dulwich-shanghai.cn)
Deputy Child Protection Officer	Neil Crossland (Neil.Crossland@dulwich-shanghai.cn) Simon Underhill (Simon.Underhill@dulwich-shanghai.cn) Cathy Taylor (Catherine.Taylor@dulwich-shanghai.cn)
Support Staff Child Protection Officer	Helen Zhang (Helen.zhang@dulwich-shanghai.cn)

Safeguarding Lead Trainer	Tony Pickhaver (Tony.Pickhaver@dulwich-shanghai.cn)
E-Safety Lead	Steven Andersen (Steven.Andersen@dulwich-shanghai.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 though 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 is 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:

- 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 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.

Training materials are also available through 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 interventions 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 aprt 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 – Policy Links

Policy documentation must show evidence of:

- 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

Appendix A – Indicators of Abuse and Neglect

We define abuse and neglect as outlined in *Keeping Children Safe in Education 2018 (DfE, p.14).* All DCI College staff, visitors and volunteers should be aware that abuse, neglect and that Safeguarding issues are rarely standalone events that are covered by one definition or label. In most cases, multiple issues will overlap with one another.

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, in an institution or community setting by those known to them or by others (e.g. via the internet). A child may be abused by an adult or adults or by another child or children.

Physical abuse: This 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.

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 such as interactions beyond a child's developmental capability; overprotection and limitation of exploration and learning, or preventing the child socially interacting; seeing or hearing the ill-treatment of another. It may involve persistent bullying/cyber bullying, or the exploitation or corruption of children. Emotional abuse can be isolated or related to all types of maltreatment of a child.

Sexual abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not always 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). Adult males do not solely perpetrate sexual abuse. Women and children can commit acts of sexual abuse.

Neglect: Persistent failure to meet a child's basic physical and/or psychological needs. Can result in serious impairment of the child's health or development. May occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent/carer failing to: provide adequate food, clothing or 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.

Appendix B – Key Roles and Responsibilities

Key Roles in Safeguarding across Dulwich College International (DCI)

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

DULWICH COLLEGE INTERNATIONAL

DCI have responsibilities at three levels:

- **Strategic:** to plan, coordinate and quality assure the delivery of safeguarding services across schools
- **Support:** promote safeguarding issues and ensure that schools are aware of their responsibilities with regard to Safeguarding. Facilitate any links to external agencies
- **Operational:** to ensure that all schools are safe places and that safer recruitment is in place to prevent unsuitable adults working or volunteering with our children.

The Designated Safeguarding Lead for Dulwich College International (DCI DSL)

This person will be the first line of communication to DCI in any safeguarding issues regarding child protection, and will ensure a consistent approach across schools in training and support of Designated Safeguarding Persons across schools. He / she will keep the Director of Schools informed of any Safeguarding matter communicated to him by one of the DCI schools. The DCI Director of Schools will keep the Chief Executive of DCI, and members of Ex-com informed as appropriate.

He / she will:

- Ensure that Safeguarding is considered in the designing, setting up, staffing and management of all DCI colleges and schools
- Ensure that everyone working for DCMI/DCI has access to the appropriate level of professional learning in Safeguarding
- Ensure that Dulwich College International Safeguarding Policy is followed across all DCI colleges and schools
- Ensure schools are updated on policy
- Ensure each school has an agreed Dulwich College International Safeguarding Policy of communication for child protection
- Ensure that safer recruitment is further developed and continually reviewed, including guidance on criminal record checking in every country
- Keep in contact with external Safeguarding professionals who may be called on to consult
- Maintain a higher level of training
- Ensure each school carries out an annual audit and creates an action plan

- Ensure the Designated Safeguarding Persons in each school meet once a year and receive professional learning
- Ensure that each school has a training programme using approved Dulwich International 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 Dulwich College International Safeguarding professional learning Policy
- Ensure links are developed with safeguarding consultants to ensure ongoing support and professional learning
- Work with the school PL Leaders to ensure there is ongoing Safeguarding Professional Learning
- Continue to develop links with outside agencies such as medical providers and embassies
- Where appropriate, she will ensure that sufficient resources are made available to enable the necessary tasks to be carried out properly.
- Ensure that the Child Protection Officer (CPO) for Safeguarding in each school or college is given sufficient time to carry out his or her duties, including accessing training.
- Review child protection practices in all schools and colleges on a regular basis, and no less than annually
- Ensure that the school is carrying out its duties to safeguard the welfare of children.
- Ensure that members of staff and volunteers are aware of current practices in this matter and that staff receive training where appropriate.
- Ensure that child protection is integrated within safeguarding induction procedures for all new members of staff and volunteers.
- Ensure that each school and college follows the procedures agreed by DCI.
- Ensure that only people suitable to work with children shall be employed in the school or work in a voluntary capacity.

The Director of each DCMI Department – Schools, Finance, Operations, HR, Marketing, IT and Communications

They will ensure that Safeguarding is embedded into their practice and departments to include designing and setting up of new schools, recruitment, curriculum design and implementation admissions and marketing

Appointed DCI Lead Trainer:

The person appointed by DCMI to lead training development across Colleges will report to the DCMI Director of Safeguarding and will:

- Lead the ***Empowering Trainer*** course annually in an agreed location to ensure Colleges can train their own trainers and that training is reviewed.
- Develop the use of DCI-approved training materials as agreed.

- Meet virtually with the appointed DCMI Director for Safeguarding and the College Lead Trainers responsible for Safeguarding as required.
- Keep up to date with changes in College, local, context national and international policy.
- Assure the quality of training through developing observation and peer review.
- Ensure any local changes made to Safeguarding materials are approved and sent to the DCI Director of Safeguarding.

DCMI Safeguarding Trainers:

Appointed Trainers for the DCI offices will:

- Follow the Dulwich International Safeguarding Policy
- Ensure PL is delivered at induction and beyond
- Ensure the use of DCI approved materials
- Attend PL annually as required
- Ensure they keep up to date with changing 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

DCI COLLEGES AND SCHOOLS

Head of College / Director

Each Head of College / Director will implement the Dulwich College International Safeguarding Policy and agreed school action plan. They will ensure that the safeguarding policy with any adaptions to their context following will be in place in their College.

Each Head of College will also:

- Take part in any safeguarding professional learning for Head of Colleges
- Create a school safeguarding working party in his/her college
- Appoint a Designated Safeguarding Person(s) / Deputy Designated Senior Person(s) for Safeguarding for the school and ensure all staff are aware of their name(s) and role
- Implement a clear Policy of communication for reporting and information sharing for child protection. Ensure that all staff understand that the sharing of information is the key to providing effective early help where there are emerging problems
- Ensure assessments of any Safeguarding situation are child-centred, that information is shared and decisions are made in the child's best interests, rooted in child development and informed by evidence
- Ensure that Safeguarding is an ongoing part of the development and action planning of their schools
- Disseminate Safeguarding awareness amongst staff, parents, visitors and students of the school

- Ensure key Safeguarding staff are replaced and receive appropriate PL to ensure that they can carry out his/her role
- Ensure that every employee of their school has appropriate safety checks and references
- Ensure that the annual DCI Safeguarding audit is complied with and acted upon
- Be the first line of communication in any allegation against an adult in their College unless the allegation is against the Head of College.
- Use the Head of College's checklist as an ongoing way of tracking the status all College / Schools Safeguarding developments in a monthly meeting with the safeguarding Lead and using the tracking form as a record of meetings.

College/School Designated Safeguarding Lead

Each DSL is responsible for:

- Ensuring that the Lead Trainer is training everyone in the school, including new staff
- Ensuring that communications are clear on how the reporting is done (e.g. putting posters around the school)
- Chairing the SG committee and making sure that CPOs attend
- Appointing new CPOs and new trainers when there is a vacancy
- Reporting at least once per term to the College Leadership Team, Board of Trustees and Board of Management
- Liaising with trainers and overseeing any new developments in training requirements
- Overseeing all documentation related to safeguarding
- Ensuring that this policy is updated and reviewed annually
- Ensuring parents are aware of the Safeguarding Policy and Policy in order to alert them to the fact that the school may need to make referrals. Raising parents' awareness may avoid later conflict if the school does have to take appropriate action to safeguard a child.
- Ensuring that the Head of College knows the status of all Safeguarding developments in the College using the Head of College's checklist and tracking form as a record of monthly meetings.

College Designated Child Protection Officers (CPO) and Deputy Child Protection Officers (DCPO)

Each CPO will be a senior member of staff who has the capacity to develop the role to lead any child protection issues; audit child protection records on an annual basis and be a member of the College Safeguarding Working Party. They should have the authority and be accessible to teachers and other staff in their school and lead child protection concerns if called upon to do so, keeping the appropriate people informed. Each CPO will have a nominated Deputy CPO who will take on the role during any absence of the CPO. Allegations against an adult in the College will be referred to the Head of College, or Director of Schools if the allegation involves the Head of College. The number of CPO and Deputy CPOs will

vary depending on the size of the school. This will be made clear in each individual school safeguarding policy.

The CPO will also act as the resource available for other staff, volunteers and members of the Board of Management and / or Board of Trustees to draw upon. The CPO is key to ensuring that proper procedures and policies are in place and are followed with regard to child safeguarding issues. The number of CPO and Deputy CPOs will vary depending on the size of the school.

The school recognises that:

- the CPOs must be senior members of staff in the school
- all members of staff must be made aware who the CPOs are and what his/her roles are
- the CPOs will need to build effective working relationships with colleagues
- the CPOs should possess skills in recognising and dealing with child welfare concerns
- the CPOs will report to the Head of College/Director in referring cases of suspected abuse or allegations to the CPO at DCMI, if appropriate and according to the procedures established by DCI
- the CPOs are not responsible for dealing with allegations made against members of staff; these should only be reported to the Head of College / Director and dealt with by the Head of College. An allegation can be taken directly to the Director of Schools if the allegation involves the Head of College / Director.

To be effective, the CPOs will:

- Act as a source of expertise within the school and be responsible for leading action regarding referrals by liaising with relevant agencies over cases of abuse and allegations of abuse, involving both children and members of staff.
- Liaise with the Head of College/Director to support any issues and ongoing investigations and ensure there is always cover for the role.
- Keep detailed, accurate and secure written records of referrals/concerns.
- Where children leave the school roll, ensure information is transferred to the new school as soon as possible, in accordance with local guidance to schools.
- Ensure that, if a child leaves and the new school is not known, the relevant authorities should be alerted where appropriate.

The CPOs also have an important role in ensuring all staff and volunteers receive appropriate professional learning. All staff and volunteers should:

- Attend training in how to identify abuse and know when it is appropriate to refer a case.
- Attend any relevant or refresher courses and then ensure that any new or key messages are passed to other staff, volunteers and Board members.
- Make themselves (and any deputies) known to all staff, volunteers and Board of Management members (including new starters and supply teachers) and ensure those

members of staff have had training in child protection. This should be relevant to their needs to enable them to identify and report any concerns to the CPOs immediately.

Each CPO should:

- Understand and have time to carry out his /her role
- Ensure that staff have the lines of communication and details of CPOs in the case of reporting child protection concerns
- Have detailed knowledge of the school's policy and procedures for managing child protection concerns
- Ensure that every staff member knows his/her role and line of communication
- Ensure that all staff understand that the sharing of information is the key to providing effective early help where there are emerging problems
- Ensure child protection documentation is kept appropriately and monitored regularly, ensuring the outcomes of safeguarding actions are reviewed and reported
- Support staff as needed
- Attend professional learning relating to Designated Persons once a year with other colleagues in the same role
- Be clear about the barriers inhibiting children from disclosing abuse and know how to respond effectively to children who do disclose
- Support staff reporting concerns
- Lead the Head of College/Director and other staff in making appropriate plans and decisions to address concerns about a child
- Ensure that issues are explained in connection with disclosure to parents if the situation arises and clarify the parent's responsibility to address those concerns
- Advise on matters of confidentiality and record keeping
- Ensure that school support services are accessed when appropriate for the child or family's well-being
- Identify ways to support staff who may be involved in a safeguarding issue
- Give support to ensure that assessments of any safeguarding situation are child-centred, that decisions are made in the child's best interests, are rooted in child development and informed by evidence
- Ensure that any weaknesses in child protection arrangements are remedied without delay

College Lead Safeguarding Trainers:

- Ensure Professional Learning is delivered by recognised Dulwich Safeguarding Trainers.
- Ensure the use of DCI-approved training materials.
- Meet virtually with the appointed DCI Director of Safeguarding as required.
- 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

Each SG Trainer will:

- Deliver approved Safeguarding Training as appropriate using approved DCI materials.
- Attend meetings and Professional Learning as required.
- Participate in peer reviews and observations of their training.

E-Safety Lead

Policies and Procedures

- Act as a point of contact on online safety issues and liaise with other members of staff as appropriate.
- Work with the leadership team to ensure policies and procedures that incorporate online safety concerns are in place.
- Connect with other schools within and without the Dulwich network to share good practice

Education and Training

- Assist with regular online safety training for all members of staff (including as part of induction)
- Work with staff to ensure that appropriate online safety education is embedded throughout the curriculum; promote the responsible use of technology and empower children to keep themselves and others safe online.
- Actively engage with local and national events to promote positive online behaviour
- Ensure that online safety is promoted to parents and carers and the wider community through a variety of channels and approaches.
- Ensure that their your own knowledge and skills are refreshed at regular intervals to enable you to keep up-to-date with current research, legislation and trends.

Standards and Inspection

- Evaluate the delivery and impact of the online safety policy and practice

- Review any reported online safety incidents to inform and improve future areas of teaching, training and policy development
- Feedback online safety issues to the management/leadership team.

Appendix C – DCI Confidential Record Of Concern (RoC)

This form must be handwritten and any notes attached

Name of Child: DoB:	Class/Year Group:
Date: Day of the week:	
Nature of Concern: *What prompted this record? Please include dates, times, incidents, discussions, observations, behaviours. This concern should be recorded within 24 hours of the incident and updated as necessary on the RoC Tracking Record.*	
Notes: *Information that could explain child's behaviour/situation.*	

Further Action: (this can include reporting to Head of College/Director/DCI/involvement of parents, agencies, place of concern on file Consider the following: 1. *If the child is deemed at significant or immediate risk of harm the Head of College/Director must be consulted.* 2. *Has this information been passed to the DCI Designated Senior Person? Please give details. If not, please record reasons why. Ensure that the reporting process is confidential and follows the reporting requirements as outlined in the DCI Safeguarding Framework* *Further actions/ review will be noted on the RoC Tracking Record.*
Signature of Adult reporting: **Signature of CPO/DCPO:**

The College Child Protection Officer (CPO) or Deputy CPO (DCPO) or Deputy DSP will lead any child protection concerns if needed. When completed this form should be securely stored in the confidential Child Protection file

Appendix D – DCI Record Of Concern Tracking Record

Student name: D.o.B: Year group:
Date file opened: Name(s) of CPO/DCPO:

The purpose of this form is to record any type of activity around a Child Protection file opened. This could be phone calls, dialogue, observations, meetings etc. File checking by the DCI Director of Safeguarding is also recorded on this form.

Date Day of week	Persons involved	Discussion Notes Include information on siblings	Action	Person Responsible

Appendix E – The DCI Safeguarding Code of Conduct

The Safeguarding Code of Conduct:
《儿童权益安全保护行为准则》：

- makes clear what is required of all staff, third-party suppliers and regular volunteers, gap students or interns and supports them in their duty to protect the child and the whole school community
- 明确规定了所有教职人员、第三方供应商、定期志愿者、间隔年学生和实习生必须遵守的各项要求，并且为他们履行保护儿童以及整个学校社区安全的职责提供支持

- reduces the risk of false allegations
- 降低了发生虚假指控的风险

- is reviewed annually by the DCI Director of Safeguarding and the DCI Safeguarding Leads
- 每年需经德威国际教育集团儿童权益安全总监以及德威国际教育集团的各个儿童权益安全负责人审查

The core competencies that must be demonstrated are:
必须遵循的核心要素为:

1. Place the child at the centre of all that you do
   一切工作准则以学生为中心
2. Understand possible signs and indicators of abuse and neglect
   了解虐待和忽视的可能迹象和显示
3. Know how to respond and communicate with children
   了解应当如何回应孩子以及如何与孩子沟通
4. Be persistent in your response to safeguarding needs
   对安全保护需求的坚持
5. Understand what might make some children more vulnerable
   了解可能会造成某些孩子更容易受到伤害的原因
6. Understand your College Safeguarding policy, related policies and Code of Conduct
   了解学校的儿童权益安全保护政策，相关条例及行为准则
7. Know how to share key information safely and who to share it with
   了解如何安全地转递关键信息，以及向谁传达

This code of conduct must be signed and returned.
请务必签署此项行为准则并上交。

If you are a member of staff, this Safeguarding Code of Conduct forms part of your contract of employment. Anyone working at any DCI school, whether in a paid or unpaid role, is expected to adhere to this Code of Conduct and you will be asked to sign and return it as acceptance of your commitment to it.

如果您是教职人员，此项《儿童权益安全保护行为准则》是您雇佣合同中的组成部分。每一位效力于德威国际教育集团旗下任何学校的工作人员，无论是带薪岗位或无薪岗位。都必须遵守此项《儿童权益安全保护行为准则》，并且必须签署该行为准则，以表明同意依照该《儿童权益安全保护行为准则》的规定行事。

You must:
您必须：

- maintain the highest levels of personal and professional conduct;
- 保持最高水平的个人及职业行为标准；
- be able to identify situations that may place a member of the school community at risk and know how to deal with such situations;
- 能够辨识可能使学校社区成员面临风险的情况，并且了解如何处理此类情况；
- know how to report any knowledge, concerns or suspicions about possible abuse or maltreatment;
- 清楚该如何对任何可能存在的虐待或打骂的情况进行举报；
- Understand the importance of safe touch as guided by the College and be aware of how physical touch may be perceived and/or misunderstood, and whether it is appropriate;
- 了解安全接触的重要性，并且意识到肢体接触会带来怎样的感知和/或误解，以及肢体接触是否适度合理；
- organise work and the workplace to minimise any potential Safeguarding risks; including always being as visible as possible to other adults when working with children;
- 对工作和工作场所的组织安排应尽可能减少任何潜在的儿童权益安全保护风险；包括在与孩子们接触的过程中，应始终尽可能有其他成年人在场；
- ensure that any actions or forms of behaviour that are inappropriate or may lead to abuse do not go unnoticed or tolerated;
- 确保任何不适当或可能导致虐待的行动或行为方式不会被忽视或默许；
- respect children's rights and treat them with fairness, honesty, dignity and respect;
- 尊重儿童的权利，根据公平、诚实、尊严和尊重的原则对待儿童；
- avoid language or behaviour that devalues the importance of safeguarding and the protection of children.
- 避免在语言或行为上贬低儿童权益安全保护的重要性。

You must never:
您绝对不能：

- abuse or maltreat a child (physically, emotionally, sexually, or through neglect);
- 虐待或粗暴对待儿童（无论是身体、情感或性方面的虐待，或者是采用漠视的态度）；
- use your position to intimidate, bully, threaten, discriminate against, coerce or undermine anyone in the school community;
- 利用职位来恐吓、欺凌、威胁、歧视、胁迫或危害学校社区中的任何人；

- behave or communicate with children or adults to build inappropriate relationships in order to abuse or put them at risk;
- 通过向儿童或成年人的沟通并建立不正当的关系，从而伤害他们或者使他们处于危险之中；
- give or receive gifts to/from children; give special rewards or privileges in an attempt to build inappropriate relationships with children;
- 给予孩子们礼物或接受孩子们的礼物；给予特殊奖励或特权，从而试图与孩子们建立不正当的关系；
- engage in, or attempt to engage in, sexual or inappropriate relationships with children, including the use of suggestive conversations, comments, texting, sharing of inappropriate images/videos, or emails;
- 与儿童发生性关系或保持不正当关系，或者试图与儿童发生性关系或保持不正当关系，其中包括使用暗示性语言、评论、信息、分享不适当的图像/视频或电子邮件；
- engage with children using online personal communication including but not limited to e-mail, chats, and social networks, except only professional online tools and environments that are sanctioned by the employer and used in the course of the child's education and welfare;
- 使用个人网络通信方式与孩子们接触，其中包括但不仅限于电子邮件、聊天和社交网络，但征得雇主批准并用于儿童教育和福利的专业在线工具和环境除外；
- record, possess or share indecent images of children;
- 记录、掌握或传播儿童的不雅图像；
- sleep in the same room or bed as a child with whom you are working;
- 与在工作中接触的孩子们睡在同一个房间或同一张床上；
- do things for children of a personal nature that they can do themselves;
- 为孩子们做他们自己能做的私事；
- offer transport in your car to a student without express parental/management permission, except in the case of emergency;
- 在未征得家长/管理层明确许可的情况下，提出用您的交通工具接送学生，但紧急情况.
- carry out your duties or volunteering whilst adversely affected by alcohol, solvents or drugs;
- 在酒精、溶剂或药物的不利影响下开展您的工作或志愿服务；
- encourage or assist others to break the law in any way; condone or participate in behaviour by children that is illegal, abusive or endangers their safety;
- 鼓励或协助他人以任何方式违反法律规定；包容或参与儿童的非法行为，或虐待他人的行为抑或危害其安全的行为；
- discriminate against, show differential treatment towards or favour particular children to the exclusion of others.
- 歧视特定儿童、对特定儿童给予差别待遇，或者偏袒特定儿童。

This list is not exhaustive or exclusive. The basic principle is that staff and volunteers must avoid behaviours that may be inappropriate or potentially abusive towards children.
以上所列内容并非详尽无遗。应遵守的基本原则是，工作人员和志愿者必须避免对孩子们做出不适当或可能造成伤害的各种行为。

DECLARATION:
声明：

I acknowledge that I have read and understand DCI Safeguarding Policy and Competencies, and promise to strictly follow the rules and guidelines in this DCI Safeguarding Code of Conduct as a condition of my providing services to the children and staff of DCI.
本人特此确认，本人已阅读并且理解德威国际教育集团《儿童权益安全保护政策》，并且承诺将严格遵守本德威国际教育集团《儿童权益安全保护行为准则》中所载的各项条例与指引，这是本人能够向德威国际教育集团的儿童和教职人员提供服务的前提条件。

In addition, I will:
此外，本人将：

- comply with the mandatory reporting regulations of DCI to report suspected child abuse.
- 遵守德威国际教育集团的强制上报规定，举报任何虐待儿童的可疑行为。
- co-operate fully in any investigation into the abuse of a child or children.
- 在任何针对虐待儿童的调查中给予充分配合。

My signature confirms that I have read this DCI Safeguarding Code of Conduct and that, as a person working with children, I agree to follow these standards.
本人签署本文件表明本人已阅读德威国际教育集团《儿童权益安全保护行为准则》，并且作为一名接触儿童的工作人员，本人同意遵守此等标准的要求。

I understand that any action inconsistent with this DCI Safeguarding Code of Conduct or failure to take action mandated by this DCI Safeguarding Code of Conduct may result in disciplinary action up to and including removal from DCI.
本人理解，任何与德威国际教育集团《儿童权益安全保护行为准则》不相符的行为或者任何未能采取德威国际教育集团《儿童权益安全保护行为准则》之规定行为的情况，都可能导致本人遭受纪律处分，被开除出德威国际教育集团。

Name: _____
姓名： _____

Signature: _____
签名： _____

Date: _____
日期： _____

Appendix F – Volunteer Statement for Dulwich College Shanghai Pudong

Safeguarding Children at the College

Every child, regardless of age, has at all times and in all situations a right to feel safe and protected from any physical or emotional damage.

Thank you for volunteering your time to support the students and community at **the college**. We are very grateful that you commit significant time and effort to help in so many ways. You are an integral part of the Dulwich experience and for that we extend our warmest appreciation to you. To help provide a safe environment for our children, we ask that all volunteers familiarise themselves with the guidelines below and agree to them by signing and returning a copy of this statement. Please ask your host for clarification if needed.

Please do not:

- Use toilets other than the marked adults-only toilets
- Take photos or film the students unless you have already received the school's permission
- Initiate or respond to physical contact with children (report this immediately)
- Be alone with a child
- Exchange personal information with children.
- Physically or verbally abuse any child

Please do:

- Remain with your host at all times and on departure sign out and return your badge
- Report inappropriate or unacceptable behaviour immediately
- Be aware that verbal interactions with a child could be interpreted as being inappropriate
- Be aware that contact with a child from Dulwich College outside the campus may be inappropriate
- Read, sign and return this declaration to your host.

(Please add details of the appropriate contact people for your school)

If you have any serious concerns during your time at the **school or college**, the first person you should turn to is the Head of College – Caroline Taylor

Please contact her by email at caroline.taylor@dulwich-shanghai.cn

If he/she is not available then please contact the Designated Safeguarding Lead, Neil Crossland

Please contact him by email at neil.crossland@dulwich-shanghai.cn

I have read and understood the statements above and I agree to the terms outlined in this document.

I confirm that I have no criminal or administrative penalty record and that I have not engaged in any behaviour that is considered inappropriate for a person to work in a school environment. If further clarification is needed, please contact the Head of College.

Print Name:

Signature: Date:

Appendix G – Visitor Statement for Dulwich College Shanghai Pudong

Safeguarding Children at the College

Every child, regardless of age, has at all times and in all situations a right to feel safe and protected from any physical or emotional damage.

We hope you have an enjoyable and rewarding time at College and appreciate the time you are giving to visiting and / or supporting our students' learning. To help provide a safe environment for our children, we ask that all visitors familiarise themselves with the guidelines below.

Please do not:

- Use toilets other than the marked adults-only toilets
- Take photos or film the students unless you have already received the school's permission
- Initiate or respond to physical contact with children (report this immediately)
- Be alone with a child
- Exchange personal information with children.
- Physically or verbally abuse any child

Please do:

- Remain with your host at all times and on departure sign out and return your badge
- Report inappropriate or unacceptable behaviour immediately
- Be aware that verbal interactions with a child could be interpreted as being inappropriate
- Be aware that contact with a child from College outside the campus may be inappropriate
- Read this declaration and ask your host for clarification if needed.

If you have any serious concerns during your time at the College the first person you should turn to is the Head of College, Caroline Taylor.

Please contact her at caroline.taylor@dulwich-shanghai.cn

If he she is not available then please contact the Designated Safeguarding Lead, Neil Crossland.

Please contact him at neil.crossland@dulwich-shanghai.cn