



WELLINGTON COLLEGE
HANGZHOU

SAFEGUARDING POLICY

Person Responsible for Policy: David MacKinnon

Date approved by Governing Body: October 28th, 2021

The policy is to be reviewed annually and the next review is due September 2022

Key Contacts

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CONTENTS

1. The United Nations Convention on the Rights of the Child

2. Introduction

3. Roles and responsibilities

- 2.1 Executive Board
- 2.2 School Affairs Board (SAB)
- 2.3 Safeguarding Governor
- 2.4 Wellington College China Safeguarding Lead
- 2.5 Master or Executive Master
- 2.6 Designated Safeguarding Lead (DSL)
- 2.7 Deputy Designated Safeguarding Lead (DDSL)
- 2.8 School

4. Safeguarding procedures

- 3.1 Safer recruitment
- 3.2 Allegations
- 3.3 Critical incident reporting timeline
- 3.4 Raising awareness and equipping children with skills to prevent abuse
- 3.5 Implementing procedures for reporting abuse
- 3.6 Supporting pupils who have been abused
- 3.7 Establish a safe environment

5. Policy review

6. Appendices

APPENDIX 1

Types of abuse

APPENDIX 2

Managing Allegations against Staff

APPENDIX 3

Arrangements for dealing with peer-on-peer abuse and allegations

APPENDIX 4

Example Referral/Concern form

APPENDIX 5

Use of Reasonable Force

APPENDIX 6

China Laws and Conventions Guiding the Child Protection Policy

APPENDIX 7

Training Framework

APPENDIX 8

Using MyConcern

1. The United Nations Convention on the Rights of the Child

Proclaimed by General Assembly Resolution 1386(XIV) of 20 November 1959. This was the basis of the basis of the Convention of the Rights of the Child adopted by the UN General Assembly 30 years later on 20 November 1989.

The Convention on the Rights of the Child was entered into force on 2 September 1990.

“The child shall enjoy all the rights set forth in this Declaration. Every child, without any exception whatsoever, shall be entitled to these rights, without distinction or discrimination on account of race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status, whether of himself or of his family.”

“The child shall enjoy special protection, and shall be given opportunities and facilities, by law and by other means, to enable him to develop physically, mentally, morally, spiritually and socially in a healthy and normal manner and in conditions of freedom and dignity. In the enactment of laws for this purpose, the best interests of the child shall be the paramount consideration.”

2. Introduction

Wellington College Hangzhou (the College) and the governing body are clear about their responsibilities in relation to safeguarding and promoting the welfare of children. We adhere to local safeguarding legal requirements and adhere to and apply UK standards of safeguarding practice within the context of the school. Wellington College Hangzhou also seeks to meet all standards required by the Council of British International Schools (COBIS).

The principles that underpin Safeguarding are:

- The safety and wellbeing of pupils is always a priority in all aspects of operation
- Every pupil has a right to feel safe and the College child-centred approach is informed by the *United Nations Convention on the Rights of the Child*
- Every adult who works with children has a responsibility to keep them safe. The College is committed to ensuring all those who work with pupils receive appropriate safeguarding training.
- The needs of the individual pupil is supported and it is recognised that some children are potentially more vulnerable than others, e.g. children with SEN, disabilities and looked after children.

All staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. Wellington College Hangzhou and its staff form part of the wider safeguarding system for children. Wellington College Hangzhou and its staff are committed to ensuring we provide a child-centred and coordinated approach to safeguarding.

Our policy applies to all staff, governors, volunteers and visitors working in the College. There are six main elements to our policy:

- 1 Establishing a safe environment in which children can learn and develop;
- 2 Ensuring we practice safer recruitment in checking the suitability of staff and volunteers to work with children and create a culture of vigilance;
- 3 Raising awareness of and responding appropriately to safeguarding and Child Protection issues;
- 4 Equipping children with the skills needed to keep them safe;
- 5 Having clear procedures for identifying additional needs and reporting cases, or suspected cases, of abuse and allegations against teachers and other members of staff;
- 6 Supporting pupils who have been abused in accordance with a Child Protection Plan.

3. Aims and objectives

To provide pupils with relevant information, skills and attitudes to help them to resist abuse and prepare for the responsibilities of adult life including home and family. Together with these skills we hope that pupils will feel confident that they can confide in staff on issues of neglect, abuse and deprivation.

To allow staff to be familiar and confident with the appropriate child protection procedures and issues, the College is committed to ensuring that all staff participate in safeguarding training on an annual basis during INSET week. Staff who join the College after INSET or who were unable to attend INSET training are also required to undertake safeguarding training as soon as they onboard into the academic year. The school is committed to delivering safeguarding training on a weekly basis to ensure all staff are appropriately safeguarded. Further details around safeguarding training levels is outlined in appendix 7.

This policy is intended to give clear guidance to all staff, teaching and non-teaching on:

- a) The signs that may indicate the possibility of abuse.
- b) The procedures to follow if a child discloses abuse or a member of staff suspects abuse.
- c) How to recognise pupils who may be at risk from safeguarding / child protection concerns and know how to help them
 - To work with parents to build an understanding of the College's responsibility to ensure the welfare of all children and a recognition that this may occasionally require cases to be referred to other investigative agencies as a constructive and helpful measure.
 - To monitor children who have been identified as 'at risk' and provide a supportive framework for them.
 - To contribute to an inter-agency approach to child protection by developing effective and supportive liaison with other agencies and schools – thereby contributing towards a more effective detection of the incidence of child abuse.
 - To review regularly the College procedures and improve the way child protection issues are managed.
 - To ensure that every member of College staff has the best interests of the child at every decision they make and is always the primary consideration. These objectives relate directly to the six aims of this Child Protection Policy at Wellington College Hangzhou and are intended to show how the aims are put into practice.

Pupil Education

- We try to create an environment and ethos in which children feel secure, their viewpoints are valued, they are encouraged to talk and they are listened to.
- We provide suitable support and guidance so that pupils have a range of appropriate adults whom they feel confident to approach if they are in difficulties. This is displayed via posters in all around the campus. Pupils are also regularly advised about avenues of support through assemblies, wellbeing lessons and tutorials.
- We use the College's curriculum to raise pupils' awareness and build confidence so that they have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.
- All pupils are briefed on what safeguarding is and how they can protect themselves. They also receive education about being safe online through the well-being curriculum.
- Staff treat the children with respect and all pupils are expected to treat each other and staff with respect.
- The College also undertakes regular surveys including PASS, mental health screening and general wellbeing surveys.

- We try to impress on pupils the importance of rejecting violence as a means of resolving conflict and are leading other schools in the use of restorative practice techniques when dealing with pupil conflict as well as staff issues. Coaching and restorative friendship building approaches are used in disciplinary matters to educate the individual and to initiate responsibility and reparation from the child concerned. They are encouraged to take ownership over their actions.
- We regularly review and evaluate our College policies and practices of social control and behaviour modification.
- The College keeps up to date with current issues in Safeguarding and Child Protection through its links with Wellington College China, Wellington College in the UK and external consultants.

4. Roles and responsibilities

WCC and the governing body are clear about their responsibilities in relation to safeguarding and promoting the welfare of pupils. WCC and its staff form part of the wider safeguarding system for children, and they are committed to ensuring a child-centred and coordinated approach to safeguarding is delivered.

There are seven main elements in the Policy:

1. Establishing a safe environment in which pupils can learn and develop.
2. Ensuring safer recruitment practices in checking the suitability of staff and volunteers to work with children.
3. Creating a culture of vigilance by all school stakeholders.
4. Raising awareness of and responding appropriately to safeguarding and Child Protection issues.
5. Equipping children with the skills needed to keep them safe.
6. Having clear procedures for identifying additional needs and reporting cases, or suspected cases, of abuse and allegations against teachers and other members of staff.
7. Supporting pupils who have been abused by providing a Child Protection Plan.

A safeguarding team operate across WCC to ensure application of the policy:

Role	Person
WCC Safeguarding governor	Helen Kavanagh helen.kavanagh@wellingtoncollege.cn
WCC Safeguarding Lead	Basia Lubaczewska basia.lubaczewska@huilieducation.cn
WCC Safer recruitment	Rowan Bell rowan.bell@wellingtoncollege.cn
Safeguarding Consultant	International Child Protection Advisors (ICPA) www.icpa.co.uk

WCC has a Safeguarding Working Party made up of representatives from each school and the WCC safeguarding lead. The role of the group is to:

- Review policy and guidance documentation
- Evaluate and audit safeguarding practices
 - This will comprise an annual cycle of internal audit undertaken by the DSL team
 - A three-year cycle of external objective review
- Develop an action plan encompassing operational practices and strategic development relating to the annual audit.
- Oversee professional learning with regards to safeguarding
 - Ensure all staff have experienced the appropriate level of training and that records are in place to affirm it

All members of the WCC safeguarding team and working party will be trained to advanced level which in accordance with best practice will be formally refreshed every two years.

2.1 Executive Board

The Executive Board are responsible for approving this policy and undertaking an annual review thereof. The Executive Board will appoint a governor to lead on safeguarding and a WCC safeguarding lead. The latter will present the policy, and updates thereof, along with a safeguarding strategy for approval by the Executive Board. The work of the safeguarding working party will be evaluated by the Executive Board.

2.2 School Affairs Board (SAB)

The School Affairs Board (SAB) has overall responsibility to ensure policy and procedures for safeguarding actively promote the wellbeing of pupils. It is the role of the SAB to provide scrutiny of safeguarding policy and practice. The SAB takes seriously its responsibility to fulfil its duty of care in promoting the welfare and wellbeing of pupils, ensuring their security and protecting them from harm. To this end the SAB will ensure that:

An effective, up to date child protection policy is in place and made available on the College's website;

- Appropriate policies are in place and operational
- Required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register
- All staff receive safeguarding training in accordance with this policy
- Pupils are taught about safeguarding, including online safety
- Appropriate filters and monitoring systems are in place to keep pupils safe online

2.3 Safeguarding Governor

A nominated governor for safeguarding will be responsible for safeguarding arrangements. The nominated governor will:

- Work closely with the WCC safeguarding lead
- Discusses safeguarding matters with each DSL periodically
- Review the outcome from annual audit of safeguarding procedures report to the Executive Board highlighting the effectiveness and implementation of relevant policies; staff safeguarding training; staff recruitment procedures; the handling of safeguarding issues; referral management; and the provision for teaching pupils how to keep themselves safe.
- Manage allegations made against the Master of a WCC school
- Provide guidance to schools that are managing an allegation and communicate with other governors.

2.4 WCC Safeguarding Lead

The WCC safeguarding lead is responsible for developing, reviewing and securing approval of the WCC safeguarding policy. It is also the responsibility of the WCC safeguarding lead to work with the safeguarding working party to assist in the implementation of this policy locally, support school leaders and the DSL in securing effective training for staff in schools. Annual internal safeguarding audits and the three-year external evaluation is to be managed by the WCC safeguarding lead. As requested by schools, the WCC safeguarding lead will provide advice and guidance to school leaders to secure effective application of effective policy and procedures.

2.5 The Master or Executive Master

The Master is responsible for ensuring that the procedures outlined in this Policy are followed on a day-to-day basis. To this end the Master will ensure that:

- The safeguarding policy and procedures are implemented and followed by all staff
- Appoint DSL and Deputy Designated Safeguarding Lead
- The allocation of sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively is given, including the assessment of pupils and attendance at necessary meetings
- Matters which affect pupil welfare are adequately risk assessed by appropriately trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated
- Systems are in place for pupils to express their views and give feedback which operate with the best interests of the child at heart
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the Whistleblowing Policy

- Pupils are provided with opportunities throughout the curriculum and wider co-curricular programme to learn about safeguarding, including keeping themselves safe online
- Ensure safer recruitment procedures are fully implemented
- Notifying the Disclosure and Barring Service and, other appropriate agencies, of anyone who has harmed or may pose a risk to a child.

2.6 The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) takes lead responsibility for safeguarding (including on-line safety) and child protection, and is the first point of contact for parents, pupils, staff and others if they have any concerns about safeguarding or child protection. The school will also appoint a Deputy DSL(s), ensuring that there is always an appropriately trained and designated person in the school at all times. The responsibilities of the DSL are summarised as follows:

2.6.1 Raise awareness

- Provide support, advice and expertise on all matters concerning safeguarding
- Encourage a culture among staff of listening to pupils
- Ensure that a local safeguarding policy is known, understood and used appropriately, and reviewed at least annually
- Monitor the operation of the local policy and regularly review and update the procedures and their implementation, working with the safeguarding working party and governors as necessary
- Ensure that all members of staff and volunteers receive the appropriate training, keep and maintain records of this training and ensure that staff are aware of training opportunities and the latest local policies on safeguarding
- Work closely with a local e-safety lead (to be named in the local safeguarding policy) and in line with the central office IT Director

2.6.2 Manage referrals

- Advise and act promptly upon all safeguarding concerns reported to them
- Refer cases of suspected abuse as appropriate, support staff who make or consider making any such referrals and liaise with the local authorities as required
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service or other relevant service
- Refer cases where a crime may have been committed to the police
- Maintain detailed, accurate, secure written records of concerns or referrals (e.g. MyConcern software)
- Keep the Master informed of all concerns and actions
- Monitor records of pupils in the College who are subject to a child protection plan, to ensure that they are maintained and updated as notifications are received
- Monitor the confidentiality and storage of records relating to safeguarding and when a pupil leaves, ensure their child protection file is copied for the new school as soon as possible and transfer it separately from the main pupil file, ensuring secure transit and confirmation of receipt is obtained.
- Likewise, WCC schools will request child protection files for children during the admissions process

The DSL will also contribute to the WCC safeguarding working party.

2.7 Deputy Designated Safeguarding Leads (DDSL)

DDSLs are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of a long-term absence of the DSL, a deputy will assume responsibility for all the activities described above. On a day-to-day basis safeguarding activities may be delegated to a DDSL but ultimate lead responsibility for safeguarding remains with the DSL.

2.8 Roles and responsibilities of WCC schools

Each WCC school is to appoint a DSL and have a member of the SLT with direct responsibility for safeguarding. It is the responsibility of the Master or Executive Master to ensure that the local safeguarding team ensure the effective development and implementation of policy and practice. Together the local team provide adults and pupils with relevant information, skills and attitudes to help them to be aware of the categories of abuse. The school safeguarding team allow staff to be familiar and confident with the appropriate child protection procedures and reporting procedures. This and local policy are intended to give clear guidance to all staff, teaching and non-teaching on:

- The signs that may indicate the possibility of abuse.
- The procedures to follow if a child discloses abuse or a member of staff suspects abuse.
- How to recognise pupils who may be at risk from safeguarding or child protection concerns and know how to help them:
 - To work with parents to build an understanding of the school's responsibility to ensure the welfare of all children and a recognition that this may occasionally require cases to be referred to other investigative agencies as a constructive and helpful measure.
 - To monitor children who have been identified as 'at risk' and provide a supportive framework for them.
 - To contribute to a contextually relevant inter-agency approach to child protection by developing effective and supportive liaison with other agencies, thereby contributing towards a more effective detection and management of the incidence of child abuse.
 - To regularly review the school's procedures and improve the way child protection issues are managed.
 - To ensure that every member of staff understand their duty of care to pupils.

These objectives relate directly to the rationale of this and local policy and demonstrate the effective implementation of the policy. WCC schools are also to support pupils through:

- An environment and ethos in which pupils feel secure, their viewpoints are valued, they are encouraged to talk, and they are listened to.
- Provide suitable support and guidance so that pupils have a range of appropriate adults and trained senior pupils whom they feel confident to approach if they are in difficulties.
- The school curriculum raises pupil awareness and build confidence so that they have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.
- All pupils are briefed by the Designated Safeguarding Lead, or one of the assistants, at the start of each academic year with regards their seniority within the school and the College child protection and safeguarding procedures and policy.
- All pupils are educated about digital citizenship. They also receive education about being safe online through the wellbeing curriculum.
- Staff treat children with respect and all pupils are expected to treat each other and staff with respect. The Pastoral and DSL also talks to all year groups on an annual basis. Questionnaires are also carried out as part of the Annual Review along with other occasion to provide an evaluation.
- The regular review and evaluate school policies and practices relating to social control and behaviour modification. This will include consultation with relevant pupil bodies in the school.
- Pupil opportunities to understand, and strategies for coping with, stress.
- The school keeps up to date with current issues in Safeguarding and Child Protection
- Ensuring that regular learning opportunities are created to minimise peer on peer abuse and also ensure that pupils know how to recognise unacceptable behaviour from adults or peers and feel confident to report any concerns they have.

5. Procedures

Procedures for safeguarding children will be in line with UK procedures. They will take into account guidance to safeguard and promote the welfare of children including *Working Together to Safeguard Children* and other relevant guidance documents from COBIS, CIS and local regulations. WCC have adopted *Keeping Children Safe in Education* and will ensure that all individuals we engage to work within our school are made aware of this guidance, read it and sign off with HR.

Any concerns raised about any safeguarding issues can also be raised through the Wellington College *Whistleblowing Policy* and with any members of our Safeguarding Team including the Safeguarding Governor: Helen Kavanagh.

3.1 Safer recruitment

WCC follow relevant guidance in *Keeping Children Safe in Education 2021 (Part three: Safer Recruitment)* and from the ICPC:

- WCC will ensure specific governors and staff on recruitment panels undertake all appropriate safer recruitment training as outlined in *Keeping Children Safe in Education September 2021*
- Selection and recruitment policy will include all appropriate checks on staff and suitability including DBS/ICPC checks or local equivalent. With regard to the recruitment of volunteers our policy will be rigorous and follow DBS/ICPC guidance taking into account regulated and supervised activity.
- Ensure that all adults within schools who have access to children have been checked as to their suitability as outlined in *Keeping Children Safe in Education September 2021*
- Ensure that all staff and volunteers have read the code of conduct and understand that their behaviour and practice need to be in line with it.
- Maintain personnel files on all staff in school who have contact with our children, including interns, trainee teachers and volunteers.
- Ensure that every person in a school has an up-to-date police check recorded on the Single Central Record (SCR) by the HR Manager.
- Ensure that reference checks are robust and that all recorded references are signed off and dated by a member of the senior leadership team (SLT). A telephone reference from the current employer is included for all staff and recorded on the SCR

3.2 Allegations

The content below is informed by *MANAGING ALLEGATIONS OF CHILD ABUSE BY EDUCATORS AND OTHER ADULTS IN INTERNATIONAL SCHOOLS*. This document accompanies this policy and supports the content below.

Any allegations against staff; other than the Master, volunteers, governors, contractors and visitors that indicate that they may have undertaken any of the points below will be reported immediately to the Master.

- behaved in a way that has harmed a pupil, or may have harmed a pupil
- possibly committed a criminal offence against or related to a pupil
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to pupils

If the Master is not available, an allegation will be reported to the DSL. Subsequently, the Master will inform the governor responsible for safeguarding.

It is the responsibility of the Master to take the next steps in the safeguarding process upon referral. 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-centered, in the child's best interests, rooted in child development and informed by evidence. The DSL, under guidance from the Master, or WCC safeguarding lead if sought, may gather a response team, the constitution of which will reflect the nature of the allegation. 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.

Those reporting any safeguarding concerns will adhere to the lines of communication, ensuring confidentiality. Regardless of the duty of confidentiality, any member of staff who has reason to believe that a pupil is at immediate or significant risk of harm, has a duty to forward this information without delay to the DSL.

It is recognised that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of pupils. Risk assessments may pertain to the whole school, to specific phases or areas of the school that have hazards associated with them, or to individual pupils or staff. A record of the risk assessment must be maintained.

If the allegation made to a member of staff concerns the Master, the person receiving the allegation will immediately inform the CEO, Helen Kavanagh, who will consult as above, without notifying the Master first.

The name of any member of staff considered not suitable to work with children will be referred to the Disclosure and Barring Service (DBS) and ICPC, and other relevant organisations with the advice and support of the senior director of HR and in accordance with the DBS Referral Policy.

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 pupils in the school.

3.3 Raising awareness and equipping pupils with skills to prevent abuse

It is recognised that because of the day-to-day contact with pupils, school staff are well placed to observe the outward signs of abuse and that all staff and governors have a full and active part to play in protecting our pupils from harm. School will therefore:

- Emphasise the importance of providing early help to pupils to provide support for a problem as soon as it arises, is recognised, to prevent the issue from escalating. Furthermore, it is recognised that pupils may face many challenges that put them in need of support and ensure that staff are aware of them. These include stress, peer pressure, body image concerns, anxiety, and relationship issues.
- Ensure children know that there are adults in the school whom they can approach if they are worried
- Embed opportunities in the curriculum and school life for children to develop the skills they need to recognise and stay safe from abuse, including online
- Raise the awareness to all staff members of the need to safeguard and promote the welfare of children, and of their responsibilities in identifying and reporting possible cases of abuse.
- Ensure every member of staff (including temporary, supply staff, trainee teachers and volunteers) and the governing body knows the name of the Designated Safeguarding Lead (DSL) and their deputies responsible for child protection and their role. (Link to [Keeping Children Safe in Education \(Sept 2021\)](#))
- The name of the Designated Safeguarding Lead and their deputies will be clearly visible in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse and allegations.

3.4 Implementing procedures for reporting abuse

Schools will:

- Have a Designated Safeguarding Lead and Deputy for child protection who have undertaken Advanced Training Safeguarding training.
- Ensure a nominated governor responsible for safeguarding who has been appropriately trained.

- Ensure all staff, volunteers of all nationalities and governors understand their responsibilities in being alert to the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection and the importance of reporting their concerns expeditiously.
- Ensure that all staff, volunteers and governors maintain an attitude of 'it could happen here' and when concerned about the welfare of a child always act in the best interest of the child.
- Notify an SLT member immediately if there is an unexplained absence of any pupil which raises concern.
- Keep clear written records of concerns about pupils, even where there is no need to refer the matter immediately.
- Provide a systematic means of monitoring pupils known or thought to be at risk of harm, and ensure the school contribute to assessments of need and support plans.
- Ensure all records are kept securely, separate from the main pupil file, and in a locked location preferably with two keys to reach the files (e.g. filing cabinet and door locked).
- Ensure that parents have an understanding of the responsibility placed on the school and staff for safeguarding and child protection by making the policy available to them and sharing safeguarding procedures through workshops and other means of communication.
- Seek to discuss any concerns about a pupil with their parents and gain consent to make a referral or an offer of support. However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem advice will be sought.
- Ensure all members of staff are provided with opportunities to receive basic Safeguarding training (in both English and Mandarin) in order to understand their responsibilities relating to safeguarding pupils.
- Ensure that all staff members are aware of the systems within the school or which support safeguarding. This should include the safeguarding policy, staff code of conduct and identify the DSL as part of all staff induction.
- Ensure staff understand expectations on digital safety guidance.
- Recognise that all matters relating to child protection are confidential and the Master or DSL will disclose personal information about a pupil to other members of staff on a need-to-know basis only.
- Ensure all staff must be aware that they have a professional responsibility to share information in order to safeguard pupils and that they cannot promise a child to keep secrets which might compromise the pupil's safety or wellbeing.
- Always undertake to refer a child for medical / psychological counselling unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, the school will seek advice.
- Ensure 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:
 - o bullying (including cyber bullying)
 - o physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - o sexual violence
 - o sexual harassment
 - o non-consensual engagement in sexual activity
 - o sexting (also known as youth produced sexual imagery)
 - o upskirting
 - o initiation / hazing type violence and rituals

Keeping Children Safe in Education 2021 p.15-16

When a pupil 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 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 pupil 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.

Schools will utilise a resource, such as My Concern, as a means of managing safeguarding related information.

3.5 Supporting pupils who have been abused

Schools will:

- Recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth (*Categories of Abuse Working Together (2015)*). Support for pupils and parents is available from a relevant member of staff.
- Recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- Be aware that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- Ensure these pupils are particularly closely monitored and supported and any concerns are recorded.
- Implement a Pastoral Support Plan (PSP) or Individual Education Plan (IEP); or equivalent, for pupils where there is a need for specific support in school.
- Establish a safe environment which supports all pupils.

3.6 Establish a safe environment

Schools will:

- Support pupil development in ways that foster security, confidence and resilience in every aspect of school life
- Provide an environment in which pupils feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulty.
- Ensure that pupils are educated about the expectations they should have relating to the behaviour of adults who work with them.
- Provide the best opportunities and support for pupils to achieve the best outcomes and participate in school life.
- Contribute to the wider safeguarding agenda by working within the group and local community to help pupils learn in a safe environment.
- Where a school engages with a partner organisation, there should be safeguarding requirements for representatives of the partner.
- Recognise that staff working in the school who have become involved with a pupil who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting and we will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support.
- Ensure that staff are aware of other key issues that relate towards safeguarding pupils including:
 - Staff Code of Conduct
 - Staff Handbook
 - Anti-Bullying policy
 - Safer Recruitment policy
 - Toileting and Intimate Care policy
 - Digital Safety guidance
 - Educational trips policy and risk assessments for all events and educational visits

All staff receive a digital safeguarding update at the beginning of each term to ensure they are fully briefed with any new initiatives, key issues or policy changes. All training is in dual language, English and Mandarin.

4. Policy review

The Executive Board is responsible for ensuring the annual review of this policy. This policy has been developed in accordance with the principles established by the *Children Act 1989* and in line with UK regulation and publications:

- *Working Together to Safeguard Children (March 2017)*
- *Keeping Children Safe in Education (September 2021)*
- *Guidance for Safer Working Practice for Adults who Work with Children and Young People*
- *Disclosure and Barring Service Guidance*

Policy adopted: August 2018

Policy reviewed: August 2019, August 2020 and September 2021

Next policy review: September 2022

APPENDIX 1

Types of Abuse

2.1 What to look out for and when to be concerned

All staff should be aware of the types and signs of abuse and neglect so that they are able to identify pupils who may be in need of help or protection. If staff are unsure, they should always speak to the DSL. Child abuse is 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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Pupils may be abused by an adult or adults or by another child or children.

Staff should be aware of the four main categories of child abuse which are commonly identified, although there may be cross over between categories:

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm, providing them with alcohol or drugs and administering corporal punishment 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. 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 cyber-bullying), 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.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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 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) and not leaving children at home alone; or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to a child's basic emotional needs.

Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

Other forms of abuse which staff should be aware of are:

- Children missing from education
- Child sexual exploitation
- Child criminal exploitation
- Domestic abuse
- Honour-Based Violence, Female Genital Mutilation, Forced marriage and Breast Ironing
- Radicalisation
- Children with family members in prison
- Peer on Peer abuse
- Sexual violence and sexual harassment

2.2 Signs of abuse

Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring):

- The pupil discloses that he or she has been abused, or asks a question which gives rise to that inference
- A pupil's injury cannot be reasonably or consistently explained, or is unusual in type or location
- A pattern or frequency of injuries is emerging
- The pupil engages in extreme or challenging behaviour or there is a sudden change in the pupil's behaviour
- The pupil asks to drop subjects or displays significant changes in attainment or behaviour with a particular teacher and seems reluctant to discuss reasons
- The pupil appears neglected (e.g. dirty, hungry, inadequately clothed)
- The pupil appears reluctant to return home or has been openly rejected by parents or guardians
- The pupil's development is delayed in terms of emotional progress
- The pupil withdraws emotionally, showing a lack of trust in adults
- The pupil shies away from being touched or flinches at sudden movements
- The pupil loses or gains weight

Signs you may notice

<ul style="list-style-type: none">• Withdrawn• Suddenly behaves differently• Anxious• Clingy• Depressed• Aggressive• Problems sleeping• Eating disorders• Wets the bed	<ul style="list-style-type: none">• Soiled clothes• Takes risks• Misses school/arrives very early• Obsessive behaviour• Nightmares• Drugs• Alcohol• Self-harm• Thoughts about suicide
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I. NEGLECT

Appearance / hygiene

- be smelly or dirty
- have unwashed clothes
- have inadequate clothing, e.g. not having a winter coat
- often hungry or turns up to school without having breakfast or access to any food at home

Health & Development issues

- untreated injuries, medical and dental issues
- repeated accidental injuries caused by lack of supervision
- recurring illnesses or infections
- not been given appropriate medicine

- missed medical appointments such as vaccinations
- poor muscle tone or prominent joints
- skin sores, rashes, flea bites, scabies or ringworm
- thin or swollen tummy
- anaemia
- Tiredness
- faltering weight or growth and not reaching developmental milestones (known as failure to thrive)
- poor language, communication or social skills.

Housing

- living in an unsuitable home environment (eg not having any heating)
- left alone for a long time
- taking on the role of carer for other family members
- living in a suitable home environment with food, shelter and warmth but lacking human contact, love and attention from family members (may be looked after by maids and drivers)

2. EMOTIONAL ABUSE

There often aren't any obvious physical symptoms of emotional abuse or neglect but you may spot signs in a child's actions or emotions. Changes in emotions are a normal part of growing up, so it can be really difficult to tell if a child is being emotionally abused.

Babies and pre-school children who are being emotionally abused or neglected may:

- be overly-affectionate towards strangers or people they haven't known for very long
- lack confidence or become wary or anxious
- not appear to have a close relationship with their parent, e.g. when being taken to or collected from nursery etc.
- be aggressive or nasty towards other children and animals.

Older children may:

- use language, act in a way or know about things that you wouldn't expect them to know at their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents, family members or friends
- lack social skills or have few, if any, friends
- appear upset and worried about postings on social media, WeChat etc
- feel they are being bullied online or taunted by others

3. SEXUAL ABUSE

- they might avoid being alone with people, such as family members or friends
- they could seem frightened of a person or reluctant to socialise with them.

Show sexual behaviour that's inappropriate for their age

- a child might become sexually active at a young age
- they might be promiscuous
- they could use sexual language or know information that you wouldn't expect them to know at that age

Have physical symptoms

- anal or vaginal soreness
- an unusual discharge
- sexually transmitted infection (STI)
- pregnancy

SOURCE: <https://www.nspcc.org.uk/preventing-abuse/>

4. PHYSICAL ABUSE

If a child regularly has injuries, there seems to be a pattern to the injuries or the explanation doesn't match the injuries, then this should be reported.

Physical abuse symptoms include:

- Bruises
- Broken or fractured bones
- Burns or scalds
- Bite marks
- Scarring
- The effects of poisoning, such as vomiting, drowsiness or seizures
- Breathing problems from drowning, suffocation or poisoning

2.3 Listening to pupils and record keeping

The school is to provide a range of opportunities for pupils to be listened to. If a pupil discloses that he or she has been abused or neglected in some way, the member of staff should:

- Immediately stop any other activity to listen
- Listen carefully to the pupil and keep an open mind - do not interrupt the child or be afraid of silences
- Limit the questioning to the minimum necessary for clarification using "what, when, how, where" but avoid using leading questions such as, "has this happened to your siblings?" which may prejudice an investigation
- Not make any attempt to investigate the incident themselves or make a decision as to whether or not the pupil has been abused
- Reassure the pupil, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy
- Discuss the conversation with the DSL as soon as possible and take no further action unless instructed to do so by the DSL or the Master
- Only share information on a need-to-know basis
- Make a full written record of the conversation as set out below.

Staff must record in writing all concerns, discussions and decisions made about a child as soon as possible, perhaps using MyConcern. The recording must be a clear, precise and factual account of the conversation or observations. Where a pupil has made a disclosure, the record must include details of:

- The date, day of the week, time and place
- What was said and done by whom and in whose presence
- Any noticeable non-verbal behaviour or words used by the child.

Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer.

APPENDIX 2

Managing Allegations against Staff

Allegations and complaints against staff can be minimised by having:

- Safer recruitment strategies in place
- Appropriate induction and training
- Open and transparent safeguarding ethos
- Professional code of conduct
- Regular briefing and discussion of safeguarding issues
- Ensuring that children are aware of safeguarding issues through the curriculum, eg. PSHE

An allegation is any information which indicates that a member of staff/volunteer may have:

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in such a way that indicates he or she would pose a risk of harm if they worked regularly or closely with a child.

This applies to any child the member of staff/volunteer has contact with in their personal, professional or community life.

When an allegation is received:

- Take the matter seriously and keep an open mind.
- Do not investigate.
- Do not promise confidentiality to the informant.
- Make a written record of the allegation using the informant's words (including time, date and place where the alleged incident took place, what was said and anyone else present; sign and date).
- If the concerns are about the Master, then the Safeguarding Governor should be contacted.
- Decisions must not be made without a discussion with the Master.
- Make a written record of discussions with the Master and others.
- Make sure the Master has full details of the person against whom a concern has been raised and the person who is the subject of the concern.

Allegations about members of staff and volunteers

Please also refer to accompanying *Protocol from the Task Force for Child Protection* as well as the content below.

Guidance for staff

Guidance is given to staff to be circumspect about placing themselves in situations which may:

- Put themselves or their pupils at risk of harm
- Give rise to allegations of abuse.

To reduce the risk of allegations, staff should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct. Specific information about protecting themselves is given in individual staff inductions and in safeguarding training. Particular care should be taken where staff have one-to-one meetings with pupils, or where they work in a boarding house. Staff are encouraged to self-report to a line manager if they believe a situation may be wrongly perceived or misconstrued.

The following procedures will be used where it is alleged that a member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

These procedures aim to strike a balance between the need to protect pupils from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations.

Reporting an allegation about staff

If an allegation is made about staff that appears to meet the criteria outlined above, the matter should be reported immediately to the Master.

Should the allegation involve the Master, then the matter should be reported to the governor responsible for safeguarding; Helen Kavanagh (nominated Governor for safeguarding).

Allegations about a governor should be reported to the nominated safeguarding governor.

Action to be taken by the DSL (or case manager)

All allegations must be dealt with as a priority to avoid delay. The Master (or case manager) may also consult with the governor responsible for safeguarding or WCC safeguarding lead. Only then will an attempt be made to investigate the allegation. The purpose of the initial discussion between the case manager is to consider the nature, content and context of the allegation and agree a course of action. All discussions should be recorded in writing.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken regarding the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by the Master (or case manager) and agreement reached on what information should be put in writing to the individual concerned and by whom.

In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the Master (or case manager) may request input from the education bureau from the outset.

Disclosure of information

The Master (or case manager) will inform the accused person of the allegation as soon as possible. The parents of the pupil involved will be informed of the allegation as soon as possible if they do not already know of it. Parents will be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection.

Confidentiality

The school will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties. A breach of confidentiality will be taken seriously and may warrant its own investigation.

Malicious allegations

If an allegation by a pupil is shown to have been deliberately invented or malicious, the Master will consider whether to take disciplinary action against the pupil in accordance with the school Behaviour and Discipline Policy. If a parent has made a deliberately invented or malicious allegation the Master will consider whether to require that parent to withdraw their child or children from the school. Whether or not the person making the allegation is a pupil or a parent (or other member of the public), WCC reserves the right to contact the police to determine whether any action might be appropriate.

Record keeping and references

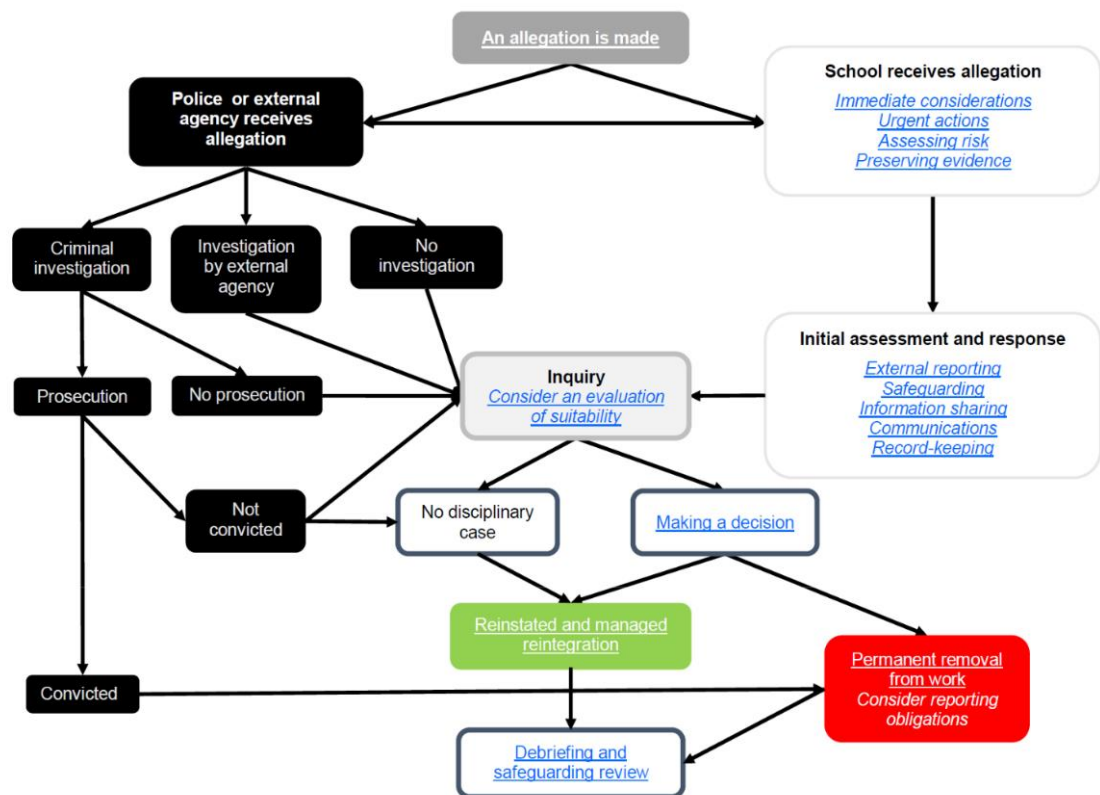
Details of allegations that are found to be malicious will be removed from personnel records. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken will be kept on the employee's file. A copy of this summary will be provided to the individual concerned. Such records will be retained.

Dismissals and resignations

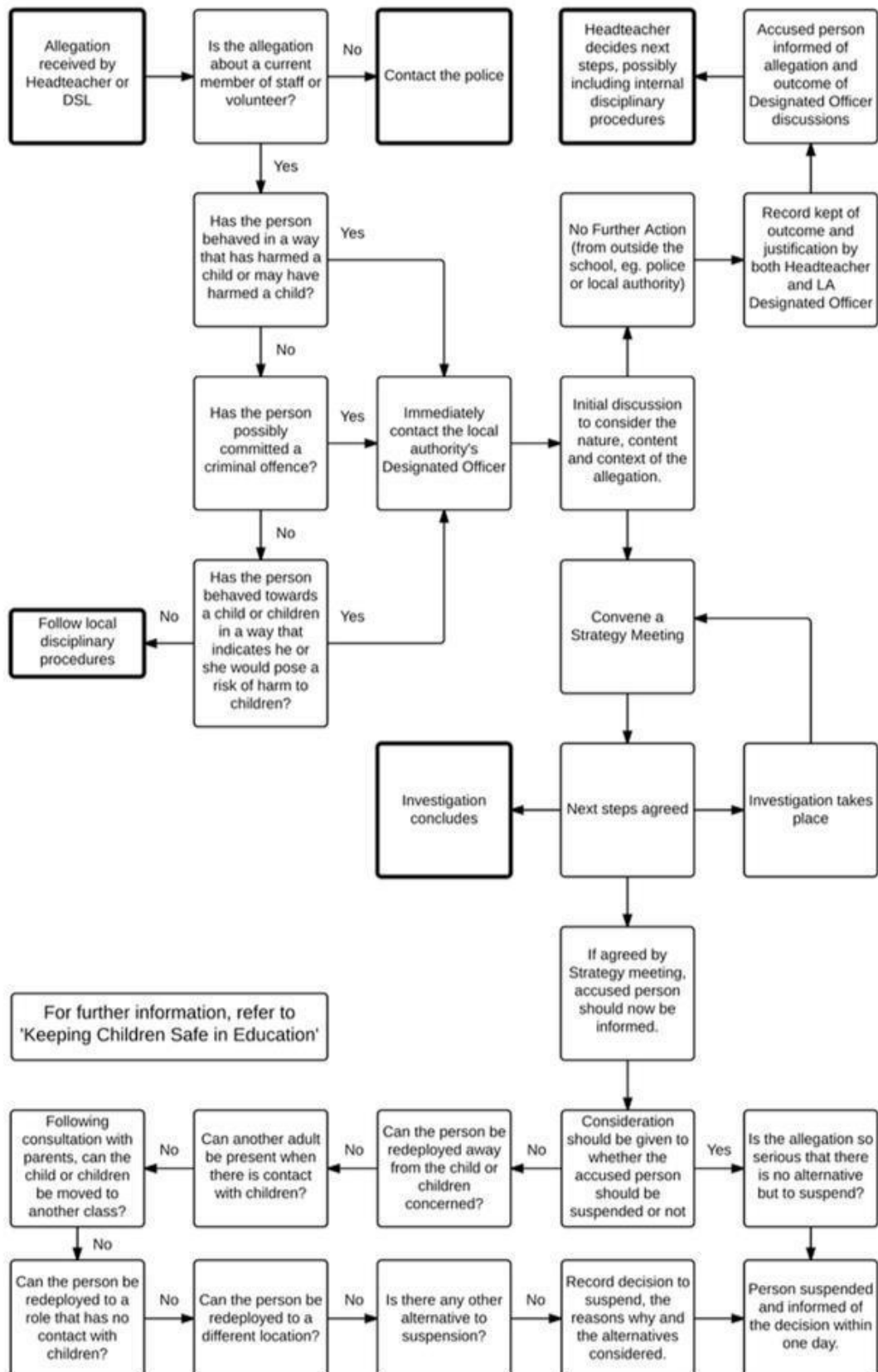
If an allegation is substantiated and the member of staff is dismissed because they are unsuitable to work with children, or would have been had the person not resigned, a report to the Disclosure and Barring Service, or equivalent, will be made promptly and in any event within one month of the person leaving the College. Any such incidents will be followed by a review of the safeguarding procedures, with a report being presented to the SAB. If a member of staff tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up in accordance with this policy and a referral will be made to the Disclosure and Barring Service, or equivalent, as soon as possible (within one month).

Sample managing allegation flow-chart

Managing allegations of child abuse by educators and other adults – a protocol for international schools



Sample flowchart for the initial management of allegations about staff or volunteers:



Key issues to note:

- Priority should be given to resolving the matter as soon as possible (usually within one month)
- Staff should not be automatically suspended
- Allegations found to be unfounded or malicious should be removed from personnel records
- Pupils making malicious allegations should face appropriate sanctions

To be considered under these guidelines, the allegation must meet the following criteria. The person must have:

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- or behaved towards a child or children in such a way that indicates he or she would pose a risk if harm if they worked regularly or closely with a child.

Actions to be agreed:

- What further information is required?
- Whether any immediate action needs to be taken to protect pupils
- When and what should the parents be told
- What should be said to the adult facing the allegation?
- Whether suspending the member of staff is required
- Suspension should not be an automatic response

Suspension should only be considered where:

- Children are at risk of serious harm where the concern is so serious that it would result in immediate dismissal
- The reason for suspension must be communicated to the person in writing within one day
- Alternatives to suspension might include alternative work, the deployment of another adult to work alongside the accused person, moving the children or reallocating the classes involved.

Possible outcomes of the initial discussion:

- Strategy Meeting (sometimes called a 'Management Planning Meeting') normally held within three days
- Referral to local education bureau or Police for investigation
- No further action (NFA)

In the case of NFA, the school should then decide how to proceed further, which may include internal disciplinary action. Informal action should be resolved within in a timely fashion. Most cases should be concluded with one month.

Any school investigation should be undertaken by a senior member of staff, HR professional and occasionally an independent person; e.g. WCC safeguarding lead.

After consulting the DSL, the accused person should be told about the allegation. The person should be told about the likely courses of action. The school should appoint a named person to offer support to the affected person.

It is important that confidentiality is maintained. It is helpful to consider how to manage speculation, leaks and gossip. No information should be offered to the media nor should any details be published that would identify any person under investigation, unless or until the person has been charged with an offence.

Outcome of Allegations

The outcome of allegation investigations should be typically identified as one of the following:

Outcome Type	Definition	Action after investigation	Recording
Substantiated	There is sufficient evidence to prove the allegation.	Discussion with HR and/or other professionals about referral to DBS and/or disciplinary hearing	There should be a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached. This should be kept in the confidential personnel file of the accused, and a copy provided to the person concerned. The record should be retained at least until the accused has reached normal person age or for a period of 10 years from the date of the allegation if that is longer. Details of allegations that are found to be malicious should be removed from personnel records.
False	There is sufficient evidence to disprove the allegation.	Where the allegation is found to be false, unsubstantiated or malicious, the information should not be included in any reference.	
Unsubstantiated	This is not the same as a false allegation. It means there is insufficient evidence to prove or disprove the allegation. This term therefore, does not imply guilt or innocence.		
Malicious	There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.		

In addition, there is a further outcome type (unfounded) which schools may wish to use, after liaison with their HR/ advisors.

***Unfounded:** there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

APPENDIX 3

Arrangements for dealing with peer-on-peer abuse and allegations

Most instances of pupils causing harm to each other will be dealt with under the school's Anti-bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a pupil towards another; referred to as peer-on-peer abuse. Examples of pupils' conduct towards each other that could raise safeguarding concerns are:

- Bullying (including cyberbullying)
- Physical violence such as hitting, kicking, biting or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing
- Youth produced sexual imagery (sexting)
- Initiation/hazing types violence and rituals.

Peer-on-peer abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence. Pupils with Special Educational Needs or Disabilities are particularly vulnerable to peer-on-peer abuse. Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls and students with SEND are more likely to be victims of these types of abuse. Sexual violence includes acts such as sexual assault, assault by penetration, and rape. A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act.

Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can take a wide variety of forms:

- Sexual comments e.g. making lewd comments or sexual remarks about a person's clothes or appearance, using sexualised names etc
- Sexual "jokes" or taunting
- Physical behaviour e.g. deliberately brushing against someone, interfering with clothing, displaying pictures, drawings or photos of a sexual nature

Online harassment e.g. non-consensual sharing of images and videos, unwanted sexualised comments and messages, including on social media. This type of harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence

Schools have an important role in developing pupil understanding of what constitutes peer-on-peer abuse and instilling behavioural norms that minimise the risk of it taking place. Staff should also be aware of the importance of:

- Enforcing the explicit rules
- Implementing in a consistent way its Behaviour Policy
- Being clear that sexual violence or sexual harassment is abusive behaviour and is unacceptable
- Implementing the school's anti-bullying strategy and promoting the Wellington values.

Other strategies in place to prevent the occurrence of peer-on-peer abuse include:

- Providing developmentally appropriate wellbeing, or other, lessons which develop pupil understanding of acceptable behaviour
- Systems for any pupils to raise concerns with staff, knowing that they will be listened to, believed and valued

- Delivering targeted work on assertiveness and keeping safe for those pupils identified as being potentially vulnerable
- Having robust supervision arrangements, particularly for those in boarding

If an allegation of peer- on-peer abuse has been made the DSL must be informed as soon as possible. A pupil against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the school's policies on behaviour and discipline will apply. Both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL as part of these procedures will produce a risk assessment which will consider the needs of all those involved (victim, perpetrator, and other pupils at the school) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other pupils; and any relevant contextual factors.

CONFIDENTIAL: Example Referral/Concern form



Time and date received by the DSL:

CONFIDENTIAL: Example Record Form



WELLINGTON COLLEGE
CHINA
惠灵顿(中国)

Safeguarding Record Form (SRF)

Please use BLACK ink only

Please complete during safeguarding related meetings and store securely within the safeguarding files

Date and time record taken:

Details of the meeting

Names of people involved:

Focus of meeting:

Record of the points discussed

List of any actions to be taken, who is responsible and when will they be complete.

Signature of record taker:

DSL signature and date:

APPENDIX 5

Use of Reasonable Force

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

- When action is necessary in self-defence or because there is an imminent risk of injury
- When 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
- Pupils are fighting
- A Pupil 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 pupil is or appears to be under the influence of alcohol or illegal substances
- A pupil 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.
- Steps to avoid these situations should be taken and the adult should be able to demonstrate that those steps were taken.
- Physical restraint should always be the last resort.

In such cases, specific briefings should be given by the appropriate Head of Department and a record maintained. Wherever possible, children should be notified that physical intervention is going to happen.

Staff have a responsibility to ensure the safety and welfare of their pupils. They are in a particular position of trust (in loco parentis). The following should be applied in all cases:

- Steps taken before any form of physical intervention is used, such shouting and using distraction techniques.
- Staff should delay if at all possible. (However, in some circumstances e.g. a pupil running out onto the road, you might be deemed negligible if you do not intervene.)
- An 'on the spot' risk assessment for each occasion should be made and also for pupils with a likelihood.
- Consideration should be given to the environment, the medical circumstances and the clothing.
- Action being taken should always be for the good of the pupil, trying to keep them safe.
- Assure the pupil that the restraint is not a punishment.
- Any physical intervention must only last for as long as the danger is present.
- Never use other students in the restraint.
- Restraint or reasonable force should be witnessed by another responsible adult. Staff should call for another adult if restraint or reasonable force is needed.
- An immediate account and written report of the incident and the steps taken to prevent and deal with it must be made to the Master and DSL.
- The incident should be followed up with time for the adult and child to talk about the situation.

APPENDIX 6

Laws and Conventions Guiding the Child Protection Policy

The child protection policy and accompanying procedures are based on local, national, and international law, including:

The PRC Minors Protection Law, 17th October 2021

The following articles are relevant to our setting and help support our work in safeguarding our pupils:

Article 3

The state shall guarantee minors' right to life, right to development, right to be protected, right to participation, and other rights. Minors shall equally enjoy all rights in accordance with the law and shall not be discriminated due to the ethnicity, race, gender, permanent household registration, occupation, religious belief, degree of education, family status, and physical and mental health status, among others, of themselves and their parents or other guardians.

Article 4

Minors shall be protected under the principle that is most beneficial to minors. The handling of matters involving minors shall satisfy the following requirements:

- (1) Offering special and preferential protection to minors.
- (2) Respecting the personal dignity of minors.
- (3) Protecting the privacy of and personal information on minors.
- (4) Adapting to the laws and characteristics of minors' mental and physical health development.
- (5) Listening to the opinions of minors.
- (6) Combining protection with education.

Article 6

Protecting minors is a common responsibility of state organs, armed forces, political parties, people's organizations, enterprises and public institutions, social organizations, self-governing organizations of a mass character at grass-roots level in urban and rural areas, guardians of minors and other adults. The state, society, schools and families shall educate, and help minors to protect their lawful rights and interests, and enhance their awareness and capability of protecting themselves.

Article 11

Any organization or individual finding any circumstance that is harmful to the physical and mental health of minors or infringing upon the lawful rights and interests of minors shall have the right to discourage and stop such circumstance and file a report or accusation to the public security organ, the civil affairs department, the education department, and other relevant departments. State organs, residents' committees, villagers' committees, entities, and their staff members in close contact with minors finding in work that minors' physical and mental health has been infringed upon, is suspected of being infringed upon, or is facing other dangerous situations, shall immediately report to the public security organs, the civil affairs departments, the education departments and other relevant departments. Relevant departments receiving an accusation or a report involving minors shall accept and handle it in a timely manner according to the law and notify the relevant entity and personnel of the handling results in an appropriate manner.

Protection by parents:

Article 17

Parents or other guardians of minors shall not conduct the following acts:

- (1) Mistreatment, abandonment, or illegal adoption of minors or committing domestic violence against minors.
- (2) Indulging, instigating, or utilising minors to commit illegal and criminal conducts.
- (3) Indulging or instigating minors to participate in heretic and superstition activities, or accepting terrorism, separatism, extremism, and other infringements.
- (4) Indulging or instigating minors to smoke (including electronic cigarettes), drink alcohol, gamble, roam the streets for begging, or bully others.
- (5) Indulging or forcing minors who shall receive compulsory education to be deprived of education or drop out of school.
- (6) Indulging minors to be addicted to the Internet and access to books, newspapers, movies, radio and television programs, audio and video products, electronic publications, and online information, among others, that are harmful to or may affect their physical and mental health.
- (7) Indulging minors to enter commercial entertainment venues, bars, business premises for Internet access services and other places that are inappropriate for minors.
- (8) Allowing or forcing minors to engage in labour other than those prescribed by the state.
- (9) Allowing or forcing minors to marry or concluding engagements for minors.
- (10) Illegally disposing of or embezzling the property of minors or utilizing minors to seek illicit interests.

Article 20

Parents or other guardians of minors finding that minors' physical and mental health has been or is suspected of being infringed upon, or that minors' other lawful rights and interests have been infringed upon, shall identify the situation and take protective measures in a timely manner. Under serious circumstances, immediate report shall be given to the public security organs, the civil affairs departments, the education departments and other departments.

Article 21

Parents or other guardians of minors shall not leave minors under the age of eight or in need of special care due to physical or psychological reasons unattended, or hand them over to persons without capacity for civil conduct, persons with limited capacity for civil conduct, persons with severe infectious diseases, or other inappropriate persons for temporary care. Parents or other guardians of minors shall not allow minors under the age of sixteen to live alone without guardianship.

Protection by School:

Article 39

Schools shall establish a student bullying prevention and control work system and provide education and training on the prevention and control of student bullying for faculty members and students. School shall immediately stop bullying behaviours of students and notify parents or other guardians of bullying and bullied minor students to participate in the identification and handling of bullying behaviours; provide psychological counseling, education and guidance for relevant minor students in a timely manner; and provide necessary family education and guidance for parents or other guardians of relevant minor students. For minor students who conduct bully, schools shall

strengthen discipline in accordance with the law based on the nature and extent of the bullying behaviours. Schools shall not conceal serious bullying behaviors and shall report to the public security organs and the education administrative departments in a timely manner and cooperate with the relevant departments on handling them in accordance with the law.

Article 40

Schools and kindergartens shall establish a work system for preventing sexual assault and sexual harassment of minors. Schools and kindergartens shall not conceal illegal and criminal acts such as sexual assault and sexual harassment of minors and shall report to the public security organs and education administrative departments in a timely manner and cooperate with the relevant departments on handling them in accordance with the law. Schools and kindergartens shall provide age-appropriate sex education for minors and improve their self-protection awareness and ability of preventing sexual assault and harassment. Schools and kindergartens shall adopt relevant protective measures in a timely manner for minors who have suffered sexual assault and harassment.

Article 77

No organisations or individuals shall conduct cyberbullying acts such as insulting, slandering, threatening or maliciously damaging the image of minors through texts, pictures, audios, videos, etc. Minors falling into the victim of cyberbullying and their parents and other guardians are entitled to notify internet service providers to delete, block, disconnect the link, etc. Upon receiving such notifications, internet service providers shall adopt necessary measures to curb cyberbullying and prevent the spread of the information.

Article 87

Local people's government and relevant departments shall safeguard campus safety and supervise and guide schools and nurseries to fulfil their responsibilities on campus security and establish a mechanism of reporting, handling and coordinating emergencies.

Anti-domestic Violence Law of the People's Republic of China, 2015:

In 2015, a law was passed (effective March 1st, 2016) that protects foreigners and Chinese citizens within China's borders from domestic violence. Two articles of this law have specific implications for children and schools:

Article 14: Schools, kindergartens, medical institutions, residents' committees, villagers' committees, social service agencies, aid management agencies, welfare agencies and their staff members shall promptly report cases to public security organs if they find, during their work, that persons with no civil capacity or persons with limited civil capacity have suffered or are suspected of suffering domestic violence. Public security organs shall keep confidential the identity of case reporters.

Article 35: Where a school, kindergarten, medical institution, residents' committee, villagers' committee, social service agency, aid management agency, welfare agency and its staff members fail to report a case to a public security organ in accordance with Article 14 herein, resulting in serious consequences, the person directly in charge and other persons subject to direct liabilities shall be given disciplinary sanctions pursuant to the law by the relevant superior competent department or their own employer. Standing Committee of the National People's Congress, (2015) *Anti-domestic Violence Law of the People's Republic of China*. Order No.37 of the President, PRC.

APPENDIX 7

Training Framework

Position	Training	Frequency
Safeguarding governor	Advanced	2 years
WCC Safeguarding lead	Advanced	2 years
Snr Director of HR	Advanced	2 years
DSL	Advanced	2 years
Master	Advanced	3 years
School HR manager	Advanced	3 years
SLT*	Advanced	3 years
All staff*	Basic	Annually
Volunteers etc.**	Introduction to safeguarding	Annually

* Delivered by DSL

** Delivered by HR Manager

APPENDIX 8

Using MyConcern

MyConcern – How to add and update an entry

What should NOT go on MyConcern?

Any low-level pastoral incident / concern – speak to tutor/homeroom teacher first.

Any safeguarding concerns about a member of staff – speak / communicate with Master or the DSL if you are ‘self-reporting’.

What should you report on MyConcern?

Any issue which concerns you about a pupil or an incident you have witnessed. This might include:

Concerns about a pupil being anxious, depressed, showing different behaviour – a subtle change over time or a rapid change.

A significant pastoral concern such as a friendship difficulty, inability to form good relationships with peers.

Any safeguarding concern – mental health issues, self-harm, suicidal ideation, eating disorder, abuse, drugs, inappropriate behaviour, bullying and peer on peer abuse of any sort, alcohol use, inappropriate use of online technology including accessing pornography, gambling, criminal activity of any sort etc.

Home issues – parental divorce, significant illness, parental mental health concerns, lack of supervision, family member in prison.

Witnessing or overhearing nasty comments about a pupil / seeing another pupil being unkind to another.

A safeguarding “event” – finding pupils in a compromising situation, a member of the public trespassing or accessing area of the College that they are not allowed, a significant accident. An event does not have to have a pupil assigned to it (especially if you are uncertain who the pupil might have been – it is more important to report what you saw).

How to report a concern

Log in at <https://www.myconcern.education>. Alternatively, you can click on the myconcern icon on the school homepage for staff.

Click on “Report a Concern”

Fill in the details on the “Report a Concern” page, remembering these important points:

- The concern summary should be brief – a couple of words only. Eg. “Injury to right leg”; “Bullying”; “Possible drugs use”
- The details of the concern box should contain ALL details, specifically names, times, places – as much detail as you have about the pupil / event / situation
- Action taken – what you did or are doing; this might just be as simple as “reporting the incident on MyConcern”; it might also include more detail – a care plan, referrals to outside agencies (eg a counsellor) – whatever action that has been taken which is relevant
- Attachment – you can attach documents to the entry. It might be a copy of some hand written notes, a piece of work that a pupil has written that you are concerned about, something which you have found (eg a note / piece of paper which is concerning)
- When you are happy, press “submit concern”

How to update a concern

- Log in at <https://www.myconcern.education>. Alternatively you can click on the myconcern icon on the school homepage for staff.
- Click on the concern that you wish to update
- Click Chronology tab
- Click on “Add Concern Update” and fill in the details
- Attach any files which might need to be added (on the files tab)

Being a team member and being assigned tasks

You may be asked to be a “team member” for a case. This will mean that you can contribute to case management or may be assigned tasks.

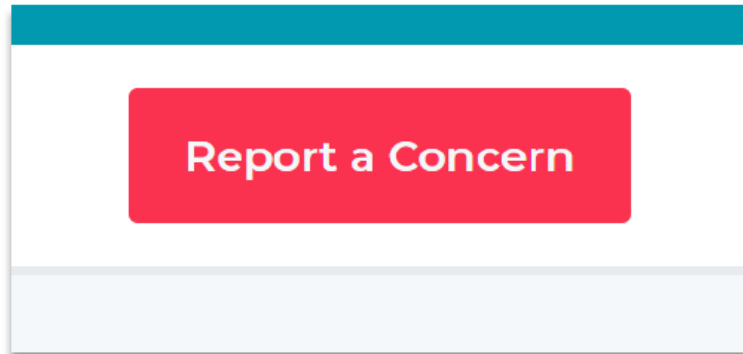
You may be assigned a task. For example, “call up parents and ask them to come in for meeting” or “monitor and update case at a later date”. If a task has been assigned, you will get an email advising you what you need to do. When the task meets the deadline, you will be sent a reminder email to complete the task.

REPORTING A CONCERN FLOWCHART

CLICK



CLICK



FILL IN THE PAGE

Report a Concern

Name(s) of Pupil(s)

Q

Concern Summary

Send Concern to

Please Select a Notification Group

▼

Concern Date/Time

Details of Concern

Location of Incident

Not Applicable

▼

Action taken

Attachment

Browse...

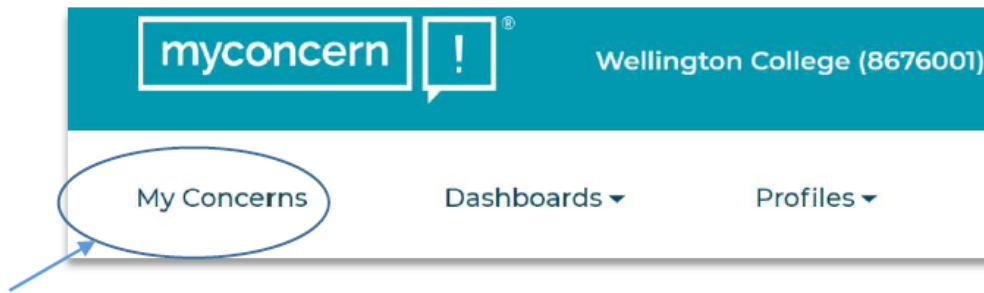
Please attach any media that is relevant to this concern.

Submit Concern

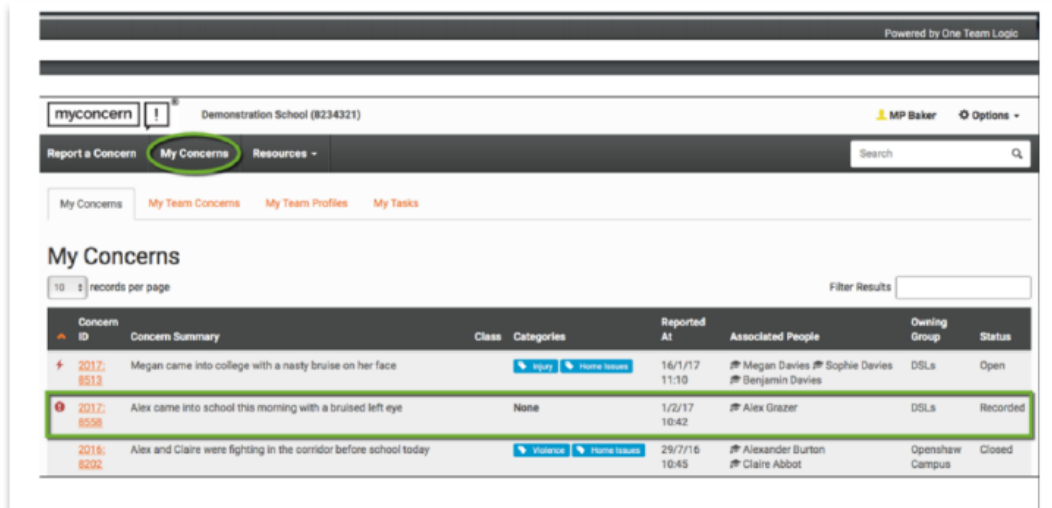
PRESS SUBMIT CONCERN

UPDATING A CONCERN FLOWCHART

CLICK ON 'MY CONCERNS'



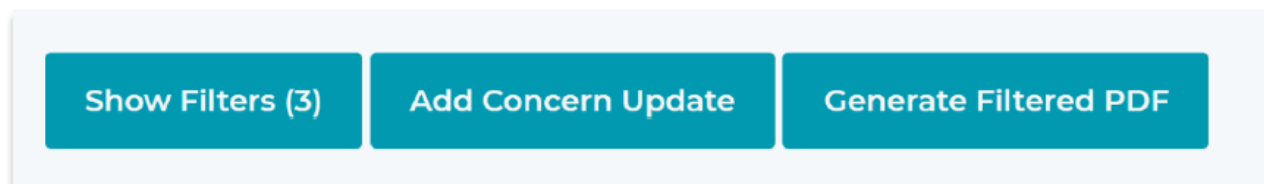
Go to the relevant concern you want to update



Click "Chronology"



Click "Add Concern Update", fill in the relevant information and click on "add update" when you have finished



Level	Needs of the pupil	Examples of support	Other comments
Low level Pastoral concern (1)	<p>This pupil may just need keeping an eye on to ensure that a low level concern does not develop into a larger issue.</p> <p>The team around the child will speak about the pupil at their meetings to ensure that there have been no further developments.</p> <p>Examples may be initial concerns regarding:</p> <ul style="list-style-type: none"> Disordered eating or weight loss Low level mental health or behaviour changes Family circumstances SEN or academic issues Friendship / relationship issues Poor sleep 	<p>The support offered will be by internal College staff and professionals.</p> <p>The pupil should be offered support by relevant individuals. This might be:</p> <ul style="list-style-type: none"> Tutor/Homeroom Teacher Counsellor Grade Leader Pastoral Leader Assistant/Deputy Head Head of School <p>The pupil will be discussed in pastoral meetings.</p>	<p>Staff should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur.</p> <p>This will enable that the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.</p>
Higher level Pastoral concern (2)	<p>This pupil will need a close eye keeping on them and is likely to need access to an additional service, usually provided by the College, but not exclusively so.</p> <p>They may be vulnerable individuals who are showing early signs of a failure to thrive and flourish, either in College or at home. Additional help is needed in order to enable them to fulfil their potential.</p> <p>This pupil will need close monitoring and there may be higher level concerns about:</p> <ul style="list-style-type: none"> Disordered eating or weight loss Mental health or behaviour changes Family circumstances (eg divorce) Significant bereavement Significant ill health within the family SEN or academic issues Friendship / relationship issues Bullying Sexual harassment Online safety / sexting Peer on peer abuse Attendance at College General social issues / social anxiety Gender issues 	<p>The support offered will usually be by internal College staff and professionals.</p> <p>The pupil should be offered support by relevant individuals. This might be:</p> <ul style="list-style-type: none"> Tutor/Homeroom Teacher Counsellor Grade Leader Pastoral Leader Assistant/Deputy Head Head of School <p>The pupil will be discussed in pastoral meetings.</p> <p>External services may be accessed, if appropriate. These might include:</p> <ul style="list-style-type: none"> Psychologist SEN Support An external therapist 	<p>The pupil will be discussed in detail pastoral meetings. Staff will ensure that an appropriate team around the child is in place and that appropriate services are engaged. A full analysis if any risk factors and vulnerabilities will be considered.</p> <p>It is likely that parents will be aware that there are pastoral concerns.</p> <p>Staff should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur.</p> <p>This will enable that the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.</p> <p>If appropriate relevant pastoral information will be shared with SLT and the Master.</p>
Intensive support and monitoring (3)	<p>This pupil will require significant support due to complex and high-level pastoral concerns. Often several areas of professional support will be required. The pupil is likely to be dealing with multiple long-term issues and they need support from individuals to ensure that the impact of these significant issues are minimised as much as possible. Issues likely to be within this category of concern are:</p> <ul style="list-style-type: none"> Eating disorder, significant weight loss Mental health – severe anxiety, depression, suicidal ideation Diagnosed mental health illness, such as OCD, Bipolar or Schizophrenia Repeated online safety concerns, sexting Repeated alcohol offences Concerns over illegal substances Significant bullying which is longer term Dangerous behaviour Serious physical illness / disability Gambling or gaming addiction 	<p>The support offered will include both internal and external professionals and agencies. This may include:</p> <ul style="list-style-type: none"> Counselling External therapists DSL involvement <p>The pupil will be discussed in pastoral meetings. and will be flagged to teaching staff as a pupil to be aware of.</p> <p>This pupil might be put onto an individualized safeguarding plan(ISP) which will be overseen by the DSL.</p>	<p>The pupil will be discussed in detail pastoral meetings. Staff will ensure that an appropriate team around the child is in place and that appropriate services are engaged. A full analysis if any risk factors and vulnerabilities will be considered.</p> <p>The ISP plan will be reviewed fortnightly.</p> <p>It is likely that parents will be aware that there are pastoral concerns.</p> <p>Staff should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur.</p> <p>This will enable that the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.</p> <p>SLT will be aware of the pupil's needs.</p>

	<ul style="list-style-type: none"> • Serious sexual harassment • Peer on peer abuse • Gender transition / reassignment • Risky sexual behaviour • Death of a parent / sibling 		
Significant, serious and urgent Level of Need (4)	<p>This pupil is likely to be living in circumstances where they are suffering or are likely to suffer significant harm, where the young person themselves may pose a risk of serious harm to others or where there are complex needs in relation to disability and may require a more specialist intervention.</p> <p>The pupil may be accessing more specialised services such as residential care or hospitalisation.</p> <p>Issues likely to be in this category of concern are:</p> <ul style="list-style-type: none"> • In-patient care for an eating or mental health issue • Suicide attempt or suicidal ideation (requiring psychiatric evaluation) • Psychiatric assessment for an acute mental health concern (such as psychosis) • Abuse – physical, sexual, emotional, neglect • Honour based violence: FGM, Forced Marriage • Sexual violence or assault • Radicalisation • Absconding, no idea of whereabouts • Homelessness 	<p>The support offered will include both internal and external professionals and agencies to help children and their families cope with very significant and long-term care. This may include a combination of:</p> <ul style="list-style-type: none"> • Therapists / medical professionals within an inpatient setting • Counselling • External Psychiatrist • External therapists • DSL and Deputy Head (Pastoral) involvement <p>The pupil will be discussed in pastoral meetings, and will be flagged to teaching staff as a pupil to be aware of.</p> <p>This pupil might be put onto an individualized safeguarding plan (ISP) which will be overseen by the DSL.</p>	<p>The pupil will be discussed in detail pastoral meetings. Staff will ensure that an appropriate team around the child is in place and that appropriate services are engaged. A full analysis if any risk factors and vulnerabilities will be considered.</p> <p>The ISP plan will be reviewed fortnightly.</p> <p>Parents will be aware that there are pastoral concerns and will have regular contact with the DSL.</p> <p>Staff should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur.</p> <p>This will enable that the team around the child has relevant information to ensure that the pupil receives the right help, at the right time, from the right people.</p> <p>The Master and the SLT will be aware of the pupil's needs. The Safeguarding Governor will be informed.</p>

ADDITIONAL INFORMATION

These following documents form part of the school's overall safeguarding practices and procedures and each document reflects our collective aim to ensure the safety and happiness of all the children in WCC.

- The Code of Conduct
- The Staff Handbook
- The College Pastoral Handbook
- The Anti-Bullying Policy
- The Guide to Boarding
- The Medical Policy and Guidance
- The Wellbeing Programme
- Health and Safety Policy
- Whistleblowing Policy
- Intimate Care Policy
- Digital Safety Policy
- Educational visits

Please log in to <https://www.myconcern.education> and sign off that you have read, understand and will abide by the following in their entirety.

1 Safeguarding Policy 2021-22

2 Staff Code of Conduct 2021-22

3 Keeping Children Safe in Education Part 1, 2021