



WELLINGTON COLLEGE  
CHINA  
惠灵顿(中国)

SAFEGUARDING POLICY

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|--|--|-----------|
| Wellington College China   | Policy &<br>Procedure<br>Coding  | WCC AC-04 |
| <p>Initiated by: WCC DSL Group</p> <p>Julian Jeffrey (Safeguarding governor)</p> <p>Dragana Popovic (WCC Safeguarding Lead)</p> <p>Ed Batey (WCIT)</p> <p>Paul Latheron (HAN)</p> <p>Gemma McDonagh (WCIS)</p> <p>Charlotte Knight-Benjafield (EYCS)</p> <p>Lana Kulas (HAS)</p> <p>Sophie Brooks (WCCH)</p> <p>Delyth Lynch (Safeguarding Consultant)</p> | <br>Signature: Julian Jeffrey                |           |
| Approved by: Executive Board   | Signature: <br>(on behalf of Executive Board) |           |
| Subject: Safeguarding Policy   | Effective Date: September 2024   |           |
| Scope: All WCC Schools   | Latest Version: September 2024   |           |
|  | Review Date: August 2025   |           |

## CHANGES TO THE POLICY FROM 2023-24

- (i) Details of the new WCC Safeguarding Lead and new DSL at HAN are provided (p 1).
- (ii) The document reflects the updated guidance from *Keeping Children Safe in Education* (KCSIE) (Sept 2024 edition) (p 5).
- (iii) KCSIE 2024 has included 'exploitation' in the 'Abuse and Neglect' heading (p 6).
- (iv) There is a new WCC Safeguarding Lead (p 7).
- (v) Paul Vanni replaces Chris Woolf on the SCPSC (p8).
- (vi) Updates to PRC laws and regulations pertaining to child protection and safeguarding (pp 43-48).

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## 1. Rationale

Wellington College China (WCC) adopts the following definition for safeguarding:

*Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes (Keeping Children Safe in Education, September 2024).*

WCC is committed to safeguarding and promoting the welfare of all pupils, and expects all staff, governors, pupils and parents to share this commitment. This policy applies to all schools in WCC and has the purpose to inform school leaders and staff about responsibilities for safeguarding pupils and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with pupils, even when this is away from the school, such as on educational visits.

For WCC, safeguarding is a priority, and every step is taken to ensure that pupils in its care are protected from all forms of abuse and neglect. This policy describes how WCC fulfils this duty and sets out the responsibilities of the group and each school therein, in securing the safeguarding and wellbeing all pupils. It includes policy provisions as well as guidance covering safeguarding practice and procedures in all schools. This document applies to all adults working or visiting schools; including volunteers, interns, trainee teachers, contractors, consultants, board members, guests and visitors.

The aim of this policy to comply with local safeguarding legal requirements and adhere to and apply UK standards of safeguarding practice within the context of the school. WCC also seeks to meet all standards required by the Council of British International Schools (COBIS) and Council of International Schools (CIS).

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 WCC child-centred approach is informed by the *United Nations Convention on the Rights of the Child. This applies to any child in a WCC school regardless of age.*
- Every adult who works with children has a responsibility to keep them safe. WCC is committed to ensuring all those who work with pupils receive appropriate safeguarding training.
- The needs of the individual pupil are supported. It is recognised that some children are potentially more vulnerable than others, e.g. children with SEN, disabilities and looked-after children. Pupils may be made more vulnerable due to ethnicity, religion, and may require early help:

### *Early help*

Staff should be particularly alert to the potential need for early help. This includes children who are disabled and have specific additional needs, children who have special educational needs, are misusing drugs or alcohol themselves, are showing signs of being drawn into anti-social or criminal behaviour, are persistently absent from education, including persistent absences for part of the school day, are privately fostered or are in family circumstances presenting challenges for the school, such as drug and alcohol misuse, adult mental health issues and domestic abuse.

In WCC schools, indicators of abuse, neglect and exploitation are adopted from the *Keeping Children Safe in Education 2024* DfE statutory guidance for Schools and Colleges and include:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect
- Exploitation

## 2. 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 operates across WCC to ensure application of the policy:

| Role                      | Person  |
|---------------------------|---|
| WCC Safeguarding governor | Julian Jeffrey<br><a href="mailto:julian.jeffrey@wellingtoncollege.cn">julian.jeffrey@wellingtoncollege.cn</a>    |
| WCC Safeguarding Lead     | Dragana Popovic<br><a href="mailto:Dragana.popovic@wellingtoncollege.cn">Dragana.popovic@wellingtoncollege.cn</a> |
| WCC Safer recruitment     | Lily Zhan<br><a href="mailto:lily.zhan@wellingtoncollege.cn">lily.zhan@wellingtoncollege.cn</a>                   |
| Safeguarding Consultant   | International Child Protection Advisors (ICPA)<br><a href="http://www.icpa.co.uk">www.icpa.co.uk</a>              |

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 is 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 and Safeguarding and Child Protection sub-committee (SCPSC) 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 and child protection sub-committee (SCPSC)

The SCPSC is a cross-group committee dedicated to ensuring the highest expectations and standards of safeguarding and child protection are maintained and developed further.

The SCPSC has the following responsibilities:

- Review school safeguarding updates and reports
- Monitor WCC safeguarding action plans
- Ensure WCC safeguarding training remains up-to-date and to include latest best practice from the UK

Core Voting Members (x9)

- WCI member (Paul Vanni)
- CEM (as Safeguarding governor)
- Director of Quality Assurance and Standards (as WCC Safeguarding Lead and Chair)
- 6x WCC DSL



Non-voting attendees may be invited by the Chair or a nominated representative of the SCPSC.

The SCPSC meets twice a year (Nov/Dec and May) and its minutes are shared with all Masters, Bursars and SAB members.

#### **Nov/Dec meeting**

- Safeguarding update from school
- Review of Safeguarding training
- Review of school safeguarding Action Plan

#### **May meeting**

- Safeguarding update from school
- Review of Safeguarding training
- Review of school safeguarding Action Plan and new plan for following year

### **2.4 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 and in the SCPSC meetings
- 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 and the Safeguarding and Child Protection sub-committee (SCPSC)

### 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 child-on-child 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.

### 3. Safeguarding 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: Julian Jeffrey.

#### 3.1 Safer recruitment

WCC follow relevant guidance in *Keeping Children Safe in Education 2024 (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 2024*
- 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 2024*
- 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-centred, 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 CEM, Julian Jeffrey, 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 Reporting timeline following a critical incident

When a safeguarding case is deemed to be particularly serious in nature, the Designated Safeguarding Leads (DSL) will be required to carry out a formal investigation and to produce a report for the Safeguarding Governor within 48 hours.

Any case which has the potential to cause reputational damage to the respective school or the group as a whole will be deemed to be serious. This could be owing to involved parties seeking publicity, or the potential for litigation. Furthermore, cases involving pupils whose level of need is deemed to level 4, or in some cases level 3, where external agency support is necessary, may also be considered serious.

Identification of such cases will be made by the College DSL, after consultation with the (Executive) Master and / or Wellington College China's (WCC) Safeguarding Lead.

When such a case is flagged, the DSL is required to alert the Safeguarding Governor in writing, giving a brief overview of the case within two hours of being informed. The DSL will then consult with the WCC Safeguarding Lead, within 24hr, who will advise on next steps regarding the investigation of the case. This meeting, less than 24hr after the case being flagged, will mark the beginning of the 48hr period at the end of which, an initial report for the Safeguarding Governor will be produced - ie no later than 72hrs or 3days after the initial flagging.

The interim report produced at the end of the 48hr period will include the following:

- Overview of the case and specific details of any allegations made
- Recommendations of the WCC Safeguarding Lead
- Details of interviews carried out as part of the investigation
- Details of further steps which are planned as part of the investigation
- Any initial findings or conclusions, if possible.

Once the report is submitted, if the investigation is ongoing the DSL will be expected to be in regular communication, which is likely to be as frequent as daily with a critical case, with the Safeguarding Governor to keep them abreast of developments. The WCC Safeguarding Lead will be used to advise as needed as the case develops.

At the conclusion of the investigation the final version of the report will be produced by the DSL, with the oversight of the (Executive) Master, before being submitted to the Safeguarding Governor. This report will feature the points above, but with the addition of lessons learned for future practice at the College.

A redacted version of the report will be made available by the WCC Safeguarding Lead for distribution amongst the WCC DSL Team, who will meet to discuss the findings and implications for safeguarding practice at their respective schools.

If an allegation is made against a member of staff, the (Executive) Master will be responsible for leading the investigation themselves or appointing someone else to do so. This may be the DSL. Or

if the person leading the case is another member of staff or the Master themselves, the DSL and the WCC Safeguarding lead will be required to support and provide expert guidance continuously through the investigation to the outcome, in-line with WCC policy. The same timeline outlined above will apply and the DSL is responsible for liaising with the WCC Safeguarding lead for advice as stipulated. If the allegation is against a member of SLT the investigation responsibility may be passed to Central Office at the request of the Master and in conjunction with the Safeguarding Governor.

### 3.4 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 \(Sept 2024\)](#)).
- 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.

### 3.5 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 child-on-child abuse. This is most likely to include, but may not be limited to:
  - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  - abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
  - sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

*Keeping Children Safe in Education 2024 p.11-13*

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 MyConcern, as a means of managing safeguarding related information.

### 3.6 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.

### 3.7 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 2024)*
- *Guidance for Safer Working Practice for Adults who Work with Children and Young People*
- *Disclosure and Barring Service Guidance*

This policy will be reviewed again in August 2025.

## APPENDIX 1

### School Safeguarding contact details

| Position                                | Name   | Phone/Email  |
|---|--|--|
| Designated safeguarding lead (DSL)      | Annalisa Adams   | <a href="mailto:annalisa.adams@hibaacademy.org">annalisa.adams@hibaacademy.org</a>   |
| Deputy DSL                              | Kelly Ashby<br>Niamh Mealy<br>Carina Ma<br>Nina Li (Na Li)<br>Demi Liu<br>Katy Piper | <a href="mailto:kelly.ashby@hibaacademy.org">kelly.ashby@hibaacademy.org</a><br><a href="mailto:niamh.mealey@wellingtoncollege.cn">niamh.mealey@wellingtoncollege.cn</a><br><a href="mailto:carina.ma@hibaacademy.org">carina.ma@hibaacademy.org</a><br><a href="mailto:na.li@hibaacademy.org">na.li@hibaacademy.org</a><br><a href="mailto:demi.liu@wellingtoncollege.cn">demi.liu@wellingtoncollege.cn</a><br><a href="mailto:katy.piper@hibaacademy.org">katy.piper@hibaacademy.org</a> |
| SLT Member responsible for safeguarding | Sophie Brookes   | <a href="mailto:sophie.brookes@hibaacademy.org">sophie.brookes@hibaacademy.org</a>   |
| Master                                  | Kathryn Richardson   | <a href="mailto:kathryn.richarson@wellingtoncollege.cn">kathryn.richarson@wellingtoncollege.cn</a>   |
| Nominated safeguarding governor         | Julian Jeffrey   | <a href="mailto:julian.jeffrey@wellingtoncollege.cn">julian.jeffrey@wellingtoncollege.cn</a>   |
| WCC Safeguarding Lead                   | Dragana Popovic  | <a href="mailto:dragana.popovic@wellingtoncollege.cn">dragana.popovic@wellingtoncollege.cn</a>   |

### Other useful contact details

| Name                      | Phone/Email   |
|---------------------------|---------------|
| Education Bureau contact  | 0571-82239700 |
| Police contact            | 0571-82834110 |
| Consulate/embassy contact | 0571-82377625 |

## APPENDIX 2

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

## 1. 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 (e.g. 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 3

### 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, e.g. 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 if 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: Julian Jeffrey (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.

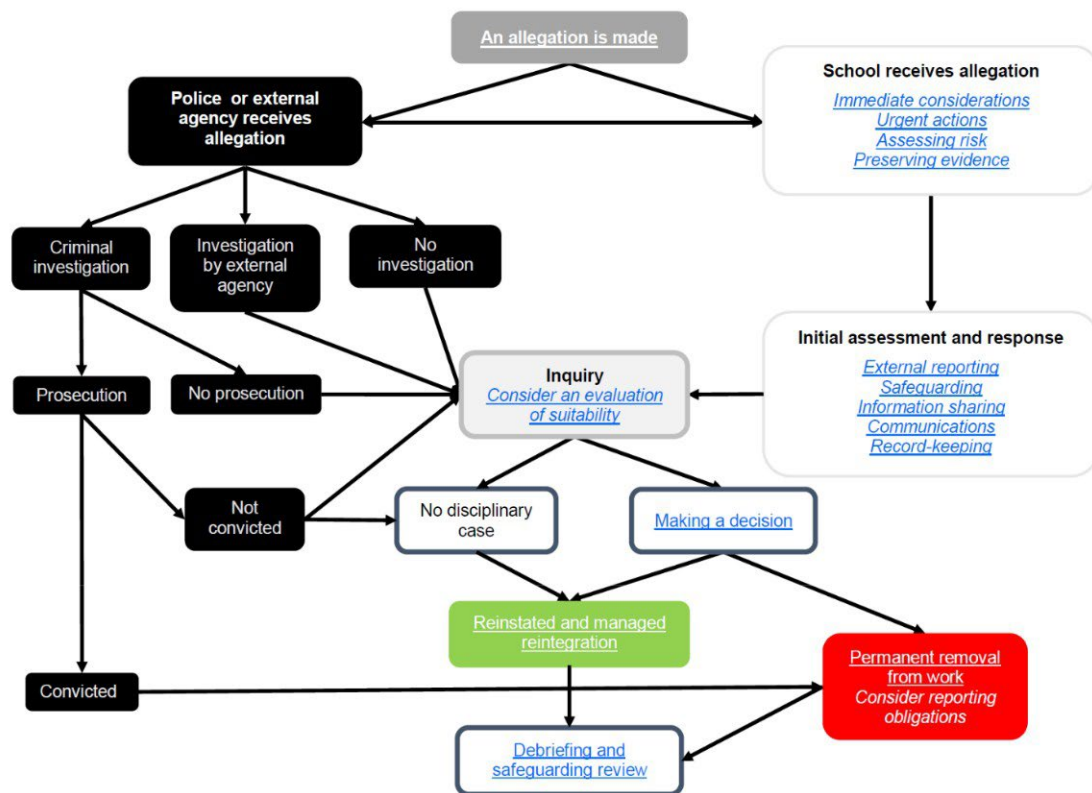
#### *Dismissals and resignations*

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.

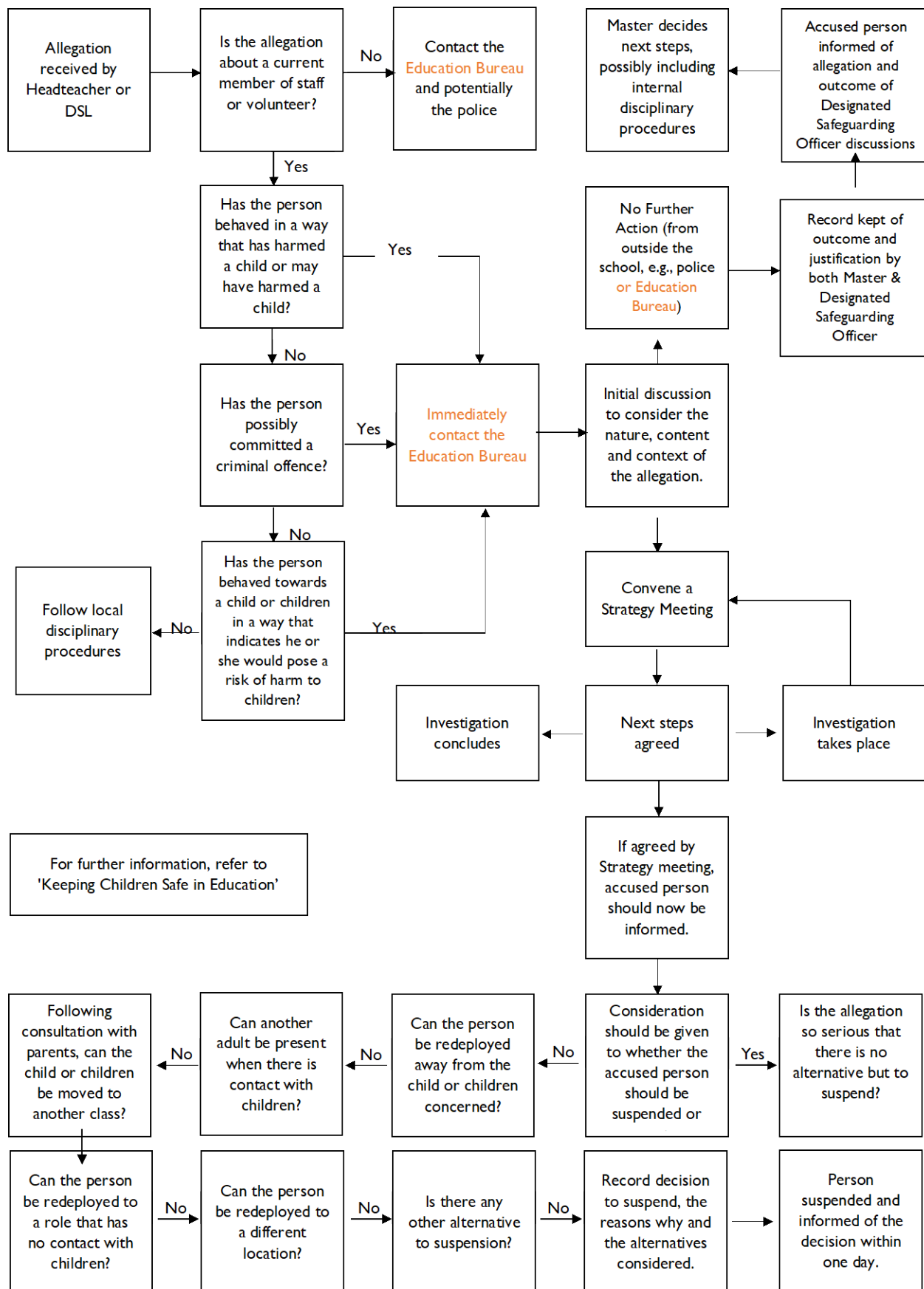
If a member of staff tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up in accordance with this policy and a referral will be made to the Disclosure and Barring Service, or equivalent, as soon as possible (within one month).

## 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  |
|------------------------|--|---|--|
| <b>Substantiated</b>   | 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. |
| <b>False</b>           | 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. | 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.  |
| <b>Unsubstantiated</b> | 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. |   |  |
| <b>Malicious</b>       | There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.  |   | Details of allegations that are found to be malicious should be removed from personnel records.  |

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 4

### Arrangements for dealing with child-on-child 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 child-on-child 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.

Child-on-child 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 child-on-child 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 child-on-child 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 child-on-child 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 child-on-child 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.

## APPENDIX 5

### **CONFIDENTIAL:** Example Referral/Concern form



WELLINGTON COLLEGE  
CHINA  
惠灵顿(中国)

#### **Safeguarding Concern Form (SCF)**

**Please use BLACK ink only**

**Please complete immediately and hand to the DSL**

Date of concern and day of the week:

Date form created:

**Details of person who is raising the concern (*they should complete this section of the form*)**

Name:

Telephone:

Email:

Signature:

**Who are you concerned about?**

**Name:**

**House:**

**Year/Form:**

**Gender:**

**Nationality:**

**Notes/Record/ Describe your concerns/record actual words used by the child:**

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 6

### 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 7

### 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, colour, 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.”

## APPENDIX 8

### 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 (Amended in 2024)**

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

##### **Article 3**

The State guarantees the rights of minors to life, right to development, right to be protected, right to participation, and other rights. Minors may equally enjoy all the rights according to law and shall not be discriminated against due to nationality, race, sex, registered permanent residence, occupation, religious belief, education, family status, physical and mental health status of themselves, their parents or other guardians.

##### **Article 4**

The principle of benefiting minors to the most shall be followed in the protection of minors. Handling matters involving minors shall meet the following requirements:

- (I) providing minors with special and preferential protection;
- (II) respecting the personal dignity of minors;
- (III) protecting minors' right to privacy and personal information;
- (IV) fitting in with the law and characteristics of minors' physical and mental health development;
- (V) listening to minors' opinions; and
- (VI) combining protection with education.

##### **Article 6**

To protect minors is the common responsibility of State organs, armed forces, political parties, people's organisations, enterprises and public institutions, social organizations, self-governing mass organisations at the grassroots level in urban and rural areas, guardians of minors and other adults. The State, society, schools and families shall educate and help minors to safeguard their legitimate rights and interests, and enhance their awareness and ability of self-protection.

##### **Article 7**

Parents or other guardians of minors shall bear the responsibility of guardianship for minors according to law. The State shall take measures to guide, support, help and supervise the parents or other guardians of minors in their performance of guardianship responsibilities.

## **Article 11**

Any organisation or individual shall, upon discovering circumstances detrimental to the physical and mental health of minors or infringing upon the legitimate rights and interests of minors, have the right to dissuade or stop such circumstances, or report or complain to the relevant authorities of public security, civil affairs and education. State organs, residents' committees, villagers' committees, entities that have close contact with minors and their staff members shall, upon discovering in their work that the physical and mental health of minors is infringed upon, suspected of being infringed upon or facing other dangerous circumstances, immediately report to the relevant authorities of public security, civil affairs and education.

The relevant authorities shall, upon receiving accusations, complaints or reports involving minors, accept and handle them in a timely manner according to law, and inform the relevant entities and persons of the handling results by proper means.

## **Protection by parents:**

## **Article 17**

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

- (I) to maltreat, abandon or illegally place out minors for adoption or commit domestic violence against minors;
- (II) to indulge, abet or make use of minors to commit illegal or criminal acts;
- (III) to indulge or instigate minors to participate in heresy, superstitious activities or to accept the harm caused by terrorism, separatism or extremism, etc.;
- (IV) to indulge or instigate minors to smoke (including electronic cigarettes, the same below), drink alcohol, gamble, wander about for begging, or bully others;
- (V) to indulge or force minors who should receive compulsory education to discontinue studies or drop out of school;
- (VI) to indulge minors to be addicted to network and to have access to books, newspapers, magazines, films, radio and television programs, audio-visual products, electronic publications, and network information that are harmful to or may affect their physical and mental health;
- (VII) to indulge minors to enter commercial entertainment places, bars, business premises of internet access service, and other places unsuitable for minors to carry out activities;
- (VIII) to permit or force minors to engage in the work other than that provided for by the state;
- (IX) to permit or force minors to marry or to enter into an engagement for minors;
- (X) to illegally dispose of or misappropriate minors' property, or to seek illegitimate interests by taking advantage of minors; or
- (XI) to commit other acts that infringe upon minors' physical and mental health and property rights and interests or fail to perform the obligation to protect minors according to law.

## **Article 19**

Parents or other guardians of minors shall, according to the minors' age and intellectual development status, listen to the minors' opinions and fully consider their true intentions before making any decision in relation to the minors' rights and interests.

## **Article 21**

Parents or other guardians of minors may not leave the minors under the age of eight or who need special care due to physical or psychological reasons uncared for, or hand them over to persons who have no or limited capacity for civil conduct, or suffer from serious infectious diseases, or other unsuitable persons for temporary care. Parents or other guardians of minors may not allow minors under the age of 16 to be free from their guardianship and live alone.

## **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 counselling, 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 behaviours 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 working system for the prevention of sexual assault or harassment of minors. Schools and kindergartens may not conceal any illegal or criminal act such as sexual assault or harassment of minors but shall timely report it to the public security organ or the education authority and cooperate with the relevant authorities to deal with it according to law. Schools and kindergartens shall provide age-appropriate sex education to minors and improve their awareness and ability of self-protection against sexual assault or harassment. Schools and kindergartens shall timely take relevant protective measures for minors who suffer from sexual assault or harassment.

## **Article 69**

Internet access service facilities provided to minors in schools, communities, libraries, cultural centers, youth and children's palaces and other places shall install software designed to protect minors online or take other safety protection technical measures. Manufacturers and sellers of intelligent terminal products shall install software designed to protect minors online or inform users of the installation channels and methods of the software designed to protect minors online in an eye-catching manner.

#### **Article 70**

Schools shall reasonably use the network to carry out teaching activities. Without the permission of the school, minor students shall not bring mobile phones and other intelligent terminal products into the classroom, and such products that are brought in school shall be managed in a unified manner. Where a school finds that any minor student is addicted to internet, it shall inform his/her parents or other guardians in a timely manner, jointly educate and guide the minor student, and help him/her resume normal study and life.

#### **Article 76**

Online live-streaming service providers shall not provide minors under the age of 16 with the account registration service of online live-streaming publishers; when providing account registration service of online live-streaming publishers for minors reaching the age of 16, the service providers shall verify the identity information of the minors and obtain the consent of their parents or other guardians.

#### **Article 77**

No organisation or individual may insult, slander, threaten or maliciously damage minors' image or conduct other cyber bullying in such forms as text, pictures, audio and videos, etc. via the internet. Minors who have been suffering from cyber bullying and their parents or other guardians shall have the right to inform the network service provider to take measures such as deleting, screening or disconnecting links. Upon receipt of such notice, the network service provider shall take necessary measures in a timely manner to stop cyber bullying and prevent the information from spreading.

### **Regulation on the Protection of Minors in Cyberspace, 1<sup>st</sup> January 2024**

#### **Article 15**

Schools, communities, libraries, cultural centers, youth and children's palaces and other places that provide minors with internet access service facilities shall provide minors with internet access guidance and a safe and healthy internet access environment by arranging for professionals, recruiting volunteers or otherwise, installing software designed to protect minors in cyberspace, or taking other technical measures for the protection of the security of the minors.

#### **Article 40**

Schools shall strengthen the guidance and training for teachers to improve their ability to early identify and intervene in minor students' internet addiction. For a minor student who is inclined to be addicted to the internet, schools shall inform their guardians in a timely manner, jointly educate and guide the minor student, and help him/her resume normal study and life.

## **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.

The newly amended **<Law of the People's Republic of China on the Protection of Women's Rights and Interests>** has taken effect on 1st January 2023,

**Article 24** Schools shall provide physical hygiene, mental health, and self-protection education for female students based on their age stage. Measures shall be taken in education, management, facilities, and other aspects to enhance their self-protection awareness and ability to prevent sexual assault and harassment, and to ensure the personal safety and physical and mental health development of female students.

Schools should establish an effective system for preventing and wisely addressing sexual assault and harassment. Schools shall not conceal illegal and criminal acts of sexual assault or harassment against female students and shall promptly notify the parents or other guardians of the underage female students who have been victims, report to the public security organs and education administrative departments, and cooperate with relevant departments to handle them in accordance with the law.

Schools, public security organs, education administrative departments, and other relevant units and personnel should protect the privacy and personal information of female students who have been sexually assaulted or harassed and provide necessary protective measures.

<Notice of the Ministry of Education, the Supreme Court and the Supreme Procuratorate on the issuance of the **<Opinions on the Implementation of the Employment Prohibition System>**, from 15th November 2022, it states that "individuals who commit illegal crimes such as sexual assault,

abuse, trafficking, and violent harm are prohibited from engaging in work that closely contacts minors”.

**«Notice of the Ministry of Education on Promoting the Inquiry of Employment of Teacher and Staff»** from 14th April 2023. It requires school to complete action that:

Search for information on sexual assault and criminal offenses as stipulated in the «Opinions on Establishing a System for Accessing and Querying Information on Sexual assault and Criminal Offences for Teaching Staff» and «Opinions on Implementing the Employment Prohibition System» for teachers to be hired by primary and secondary schools, as well as information on the loss or revocation of teacher qualifications that have been included in the teacher qualification restriction database as stipulated in the «Teacher Law of the People's Republic of China» and «Teacher Qualification Regulations».

Search for information on sexual assault and criminal offenses as stipulated in the «Opinions on Establishing a System for Accessing and Querying Sexual Assault and Criminal Information for non-teaching Staff» and the «Opinions on Implementing the Employment Prohibition System» for other staff to be hired by primary and secondary schools.



## APPENDIX 9

### 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

### MYCONCERN – HOW TO ADD AND UPDATE AN ENTRY

#### What should NOT go on MyConcern?

- Any low-level pastoral incident / concern – speak to HM or other pastoral leader/ tutor first (HM's and tutors should record these concerns on OneNote)
- Any safeguarding concerns about a member of staff – speak / communicate with DSL or Deputy DSL or anything which 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>.
- 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 concern should ALWAYS be sent to the DSL. DSL is the gatekeeper of all cases and will assign the case to others where necessary.**
- 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>.
- Click on “Update a Concern”
- 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. This is most likely to be:

- HMs or other pastoral leaders (almost always)
- Tutors (sometimes, depending on the case)
- School Nurse (sometimes)

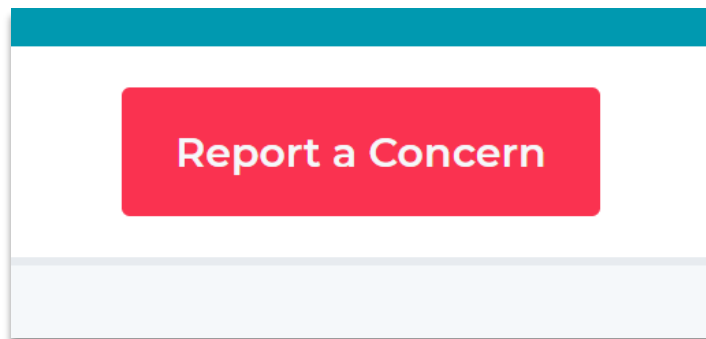
You may be assigned a task. For example, “call up parents and ask them to come in for meeting” or “HM to update case on the 31/01/22”. If a task has been assigned, you will get an email advising you what you need to do. When the task meets the deadline, you will be sent a reminder email to complete the task.

## REPORTING A CONCERN FLOWCHART

CLICK



CLICK



FILL IN THE PAGE

### Report a Concern

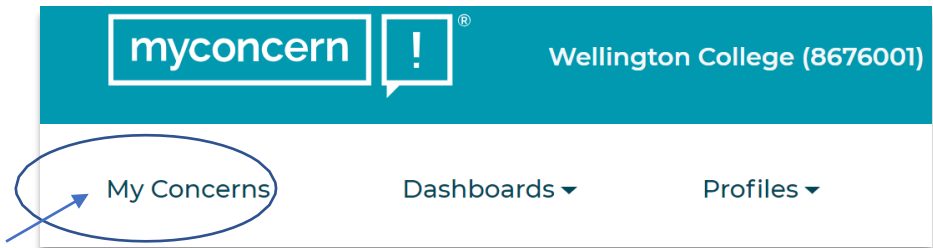
|                      |  |                                  |
|----------------------|--|----------------------------------|
| Name(s) of Pupil(s)  | <input type="text" value="Please name the Pupil(s) subject of this concern and any other Pupil(s) you want linked to it"/> | <input type="button" value="Q"/> |
| Concern Summary      | <input type="text" value="e.g. Injury – Megan arrived at School this morning with a badly bruised right eye."/>            |                                  |
| Send Concern to      | <input type="text" value="Please Select a Notification Group"/>  |                                  |
| Concern Date/Time    | <input type="text"/>   |                                  |
| Details of Concern   | <input type="text" value="There is no need to repeat the Concern Summary."/>   |                                  |
| Location of Incident | <input type="text" value="Not Applicable"/>  |                                  |
| Action taken         | <input type="text"/>   |                                  |
| Attachment           | <input type="text" value="Browse..."/>   |                                  |

Please attach any media that is relevant to this concern.

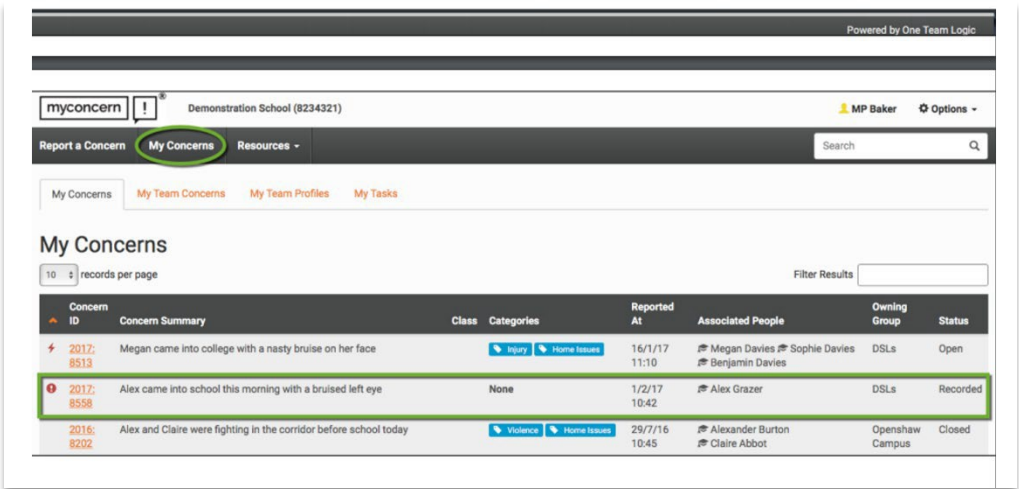
Use the guidance on the staff information sheet to complete the form. Always remember to send the concern to your DSL.

UPDATING A CONCERN FLOWCHART

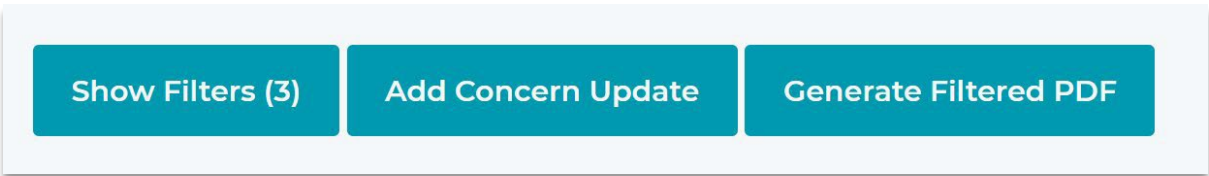
CLICK ON ‘MY CONCERNS’



Go to the relevant concern you want to update



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

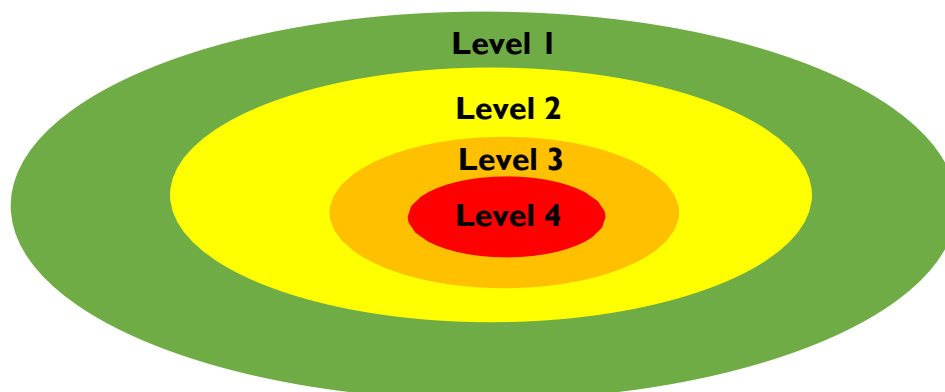


## MyConcern Levels of Need

### Levels of need

After an entry has been made onto MyConcern, a level of need will be assigned to the pupil associated with the case. Levels of need may move, depending on the pupil's circumstances. When a level of need is altered, the rationale behind that decision will be recorded on MyConcern.

The initial level of need will be decided by the DSL, based on the criteria listed below.



| Level                                 | Needs of the pupil   | Examples of support  | Other comments  |
|---------------------------------------|--|--|---|
| <b>Low level Pastoral concern (1)</b> | <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 (usually taken from HM, Tutor, class teacher, DSL / JS Lead / Nest Lead PSI group) will speak about the pupil at their weekly meetings to ensure that there have been no further developments.</p> | <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"> <li>• HM / Class teacher</li> <li>• Tutor</li> <li>• Counsellor</li> <li>• Pastoral &amp; Safeguarding Lead</li> <li>• Nurse</li> <li>• SEND Lead</li> </ul> <p>The pupil will be discussed as part of the weekly pastoral meeting and will be flagged to teaching</p> | <p>HMs should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur. At least monthly, an HM should provide a summary of the pupil on MyConcern so that their progress can be recorded.</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> |

| Level | Needs of the pupil  | Examples of support  | Other comments |
|-------|---|--|----------------|
|       | <p>Examples may be initial concerns regarding:</p> <ul style="list-style-type: none"> <li>• Disordered eating or weight loss</li> <li>• Low level mental health or behaviour changes</li> <li>• Family circumstances</li> <li>• SEN or academic issues</li> <li>• Friendship / relationship issues</li> <li>• Poor sleep</li> </ul> | <p>staff as a pupil to be aware of.</p> <p>The Safeguarding Lead will discuss the pupil at their regular meeting with the HM or other pastoral leader/ Class teacher</p> |                |

| Level                                    | Needs of the pupil  | Examples of support  | Other comments   |
|--|---|--|--|
| <b>Higher level Pastoral concern (2)</b> | <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"> <li>Disordered eating or weight loss</li> <li>Mental health or behaviour changes</li> <li>Family circumstances (eg divorce)</li> <li>Significant bereavement</li> <li>Significant ill health within the family</li> <li>SEN or academic issues</li> </ul> | <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"> <li>HM / Class teachers</li> <li>Tutor</li> <li>Counsellor</li> <li>Pastoral and Safeguarding Lead</li> <li>Nurse</li> <li>SEN Lead</li> <li>DSL</li> </ul> <p>The pupil will be discussed as part of the weekly pastoral meeting and will be flagged to teaching staff as a pupil to be aware of.</p> <p>The Safeguarding lead will discuss the pupil at their fortnightly meeting with the HM / class teacher</p> <p>External services may be accessed, if appropriate. These might include:</p> <ul style="list-style-type: none"> <li>Psychologist</li> <li>SEND Support (eg an educational psychologist)</li> <li>An external therapist</li> <li>Education Welfare Service</li> </ul> | <p>The pupil will be discussed in detail at a DSL regular meeting. 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>HM's / JS Class teacher should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur. At least monthly, an HM should provide a summary of the pupil on MyConcern so that their progress can be recorded.</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> |



|  |  |  |  |
|--|--|--|--|
|  | <ul style="list-style-type: none"> <li>• Friendship / relationship issues</li> <li>• Bullying</li> <li>• Sexual harassment</li> <li>• Online safety / sexting</li> <li>• Peer on peer abuse</li> <li>• Attendance at College</li> <li>• General social issues / social anxiety</li> <li>• Gender issues</li> </ul> |  |  |
|--|--|--|--|

| Level                                       | Needs of the pupil   | Examples of support  | Other comments   |
|---|--|--|--|
| <b>Intensive support and monitoring (3)</b> | <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"> <li>• Eating disorder, significant weight loss</li> <li>• Mental health – severe anxiety, depression, suicidal ideation</li> <li>• Diagnosed mental health illness, such as OCD, Bipolar or Schizophrenia</li> <li>• Repeated online safety concerns, sexting</li> <li>• Repeated alcohol offences</li> <li>• Concerns over illegal substances</li> </ul> | <p>The support offered will include both internal and external professionals and agencies. This may include:</p> <ul style="list-style-type: none"> <li>• Counselling</li> <li>• External psychologist or Psychiatrist</li> <li>• External therapists</li> <li>• Pastoral and Safeguarding Lead, JS and Nest Safeguarding Leads and Heads of School</li> <li>• Education welfare service</li> </ul> <p>The pupil will be discussed as part of the weekly DSL meeting and will be flagged to teaching staff as a pupil to be aware of.</p> <p>The Pastoral and Safeguarding Lead will discuss the pupil at their fortnightly meeting with the HM.</p> <p>This pupil will be put onto a College welfare plan which will be overseen by the DSL and specialist tutoring support will also be offered and discussed.</p> | <p>The pupil will be discussed in detail at DSL group 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 welfare plan will be reviewed fortnightly.</p> <p>It is likely that parents will be aware that there are pastoral concerns.</p> <p>HM's / class teachers should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur. At least fortnightly, an HM should provide a summary of the pupil on MyConcern so that their progress can be recorded.</p> <p>This will enable 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 WCC Lead or Safeguarding Governor will be informed.</p> |

|  |   |  |  |
|--|---|--|--|
|  | <ul style="list-style-type: none"> <li>• Significant bullying which is longer term</li> <li>• Dangerous behaviour</li> <li>• Serious physical illness / disability</li> <li>• Gambling or gaming addiction</li> <li>• Serious sexual harassment</li> <li>• Peer on peer abuse</li> <li>• Gender transition / reassignment</li> <li>• Risky sexual behaviour</li> <li>• Death of a parent / sibling</li> </ul> |  |  |
|--|---|--|--|

| Level  | Needs of the pupil  | Examples of support   | Other comments  |
|--|---|---|---|
| <b>Significant, serious and urgent Level of Need (4)</b> | <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"> <li>• In-patient care for an eating or mental health issue</li> <li>• Suicide attempt or suicidal ideation (requiring psychiatric evaluation)</li> <li>• Psychiatric assessment for an acute mental health concern (such as psychosis)</li> </ul> | <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"> <li>• Therapists / medical professionals within an inpatient setting</li> <li>• Counselling</li> <li>• College / external Psychiatrist</li> <li>• External therapists</li> <li>• DSL and Deputy Head (Pastoral) involvement</li> <li>• Education welfare service</li> </ul> <p>The pupil will be discussed as part of the weekly pastoral meeting and will be flagged to teaching staff as a pupil to be aware of.</p> <p>The Deputy Head (Pastoral) will discuss the pupil at their fortnightly meeting with the HM.</p> <p>This pupil will be put onto a College welfare plan which will be overseen by the DSL and specialist</p> | <p>The pupil will be discussed in detail at DSL group 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 welfare plan will be reviewed weekly.</p> <p>Parents will be aware that there are pastoral concerns and will have regular contact with the HM and also the DSL.</p> <p>A Child Protection Plan may be in place and will be monitored and overseen by the DSL.</p> <p>HMs should build up a full chronology of the pupil on MyConcern, adding any relevant updates as soon as they occur. At least fortnightly, an HM should provide a summary of the pupil on MyConcern so that their progress can be recorded.</p> <p>This will enable 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 WCC Lead and the</p> |

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|--|---|--|---|
|  | <ul style="list-style-type: none"> <li>• Abuse – physical, sexual, emotional, neglect</li> <li>• Honour based violence: FGM, Forced Marriage</li> <li>• Sexual violence or assault</li> <li>• Radicalisation</li> <li>• Absconding, no idea of whereabouts</li> <li>• Homelessness</li> </ul> <p>In this level of need, a referral will have been made to Children's Social</p> | tutoring support will also be offered and discussed. | Safeguarding Governor will be informed. |
|--|---|--|---|

NB – there is a school-specific update for WCIS available on the DSL Teams site (2023-)

## 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