



WELLINGTON COLLEGE  
INTERNATIONAL  
SHANGHAI

# SAFEGUARDING AND CHILD PROTECTION 2022-23

## POLICY

Wellington College International Shanghai	Policy & Procedure	WCIS_01
Initiated by: Robbie Davies, DSL	Signature:	
Approved by: Brendon Fulton	Signature:	
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## KEY CONTACTS

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### Governance

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Safeguarding Governor	Julian Jeffrey	Julian.Jeffrey@wellingtoncollege.cn
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## I. THE UNITED NATIONS CONVENTION ON THE RIGHTS OF THE CHILD

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

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

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

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

## 2. INTRODUCTION

Wellington College International Shanghai (the College) fully recognises its responsibilities for safeguarding children. Our policy applies to all staff, governors and volunteers working in the school. It also applies to all pupils at the College. *Though Wellington College Shanghai is not regulated by the UK authorities with regard to safeguarding, the UK is widely considered to have the most exacting standards worldwide. Equally with our parent school in the UK we consider it logical and desirable to hold ourselves to these standards.*

As per Keeping Children Safe in Education (2022) safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment;
- preventing the 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.

The principles that underpin safeguarding are:

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

All staff receive regular annual training in child protection. The College uses Educare online training which is delivered in association with COBIS (Council of British International Schools). All staff who work on the site complete the child protection training modules. In addition, pastoral leaders are offered additional modules related to specific safeguarding issues. The Educare training forms the main component of training with regards to child

protection. It is supplemented throughout the year by a curated programme of training, led by the DSL & Safeguarding Team, in conjunction with Heads of School, House Masters and the pastoral team.

At the heart of our policy lies:

1. Prevention: a positive school atmosphere, careful and vigilant teaching, strong pastoral care, effective support to pupils, provision of good adult role models, an effective and robust safe recruitment policy
2. Protection: reading and following agreed policies and procedures; ensuring staff are trained and supported to respond appropriately and sensitively to child protection concerns. Equipping children with the skills needed to keep themselves safe.
3. Support: for pupils who have reported abuse of any nature, involving themselves or any other member of the College community. For staff who have either reported abuse or been involved in any investigation. For parents who need guidance in times of need.

### 3. AIMS AND OBJECTIVES

The purpose of this policy is to inform those who work closely with children and their families of the most common signs of child abuse and to prescribe the procedures that must be followed to protect the child.

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

1. How we provide pupils with relevant information, skills and attitudes to help them to resist abuse and prepare for the responsibilities of adult life including home and family.
2. How we aim create an environment in which pupils will feel confident that they can confide in staff on issues of neglect, abuse and deprivation.
3. How we ensure staff are familiar and confident with the appropriate child protection procedures and issues, including:
  - a) The signs that may indicate the possibility of abuse.
  - b) The procedures to follow if a child discloses abuse or a member of staff suspects abuse.
4. Our work with parents to build an understanding of the College's responsibility to ensure the welfare of all children and a recognition that this may occasionally require cases to be referred to other investigative agencies as a constructive and helpful measure.
5. Our work to monitor children who have been identified as 'at risk'.
6. Our work to continue to develop effective and supportive liaison with other agencies and schools – thereby contributing towards a more effective detection of the incidence of child abuse.
7. Our commitment to review annually the College procedures and improve the way child protection issues are managed.

#### **Pupil Education**

- We create an environment and ethos in which children feel secure, their viewpoints are valued, they are encouraged to talk openly, and they are listened to without judgement.

- We provide suitable support and guidance so that pupils have a range of strategies and access to appropriate adults whom they feel confident to approach if they feel the need to.
- We use the College's curriculum to raise pupils' awareness of safeguarding issues and build confidence so that they are in the best position to ensure their own protection and understand the importance of protecting others.
- We treat children with respect and all pupils are expected to treat each other and staff with the same respect. Pupil voice surveys on safety and pastoral care are carried out on a regular basis and shared with SLT and external review teams.
- We offer pupils positive role models through staffing, materials used, selection of curricular content and other experiences.
- We impress on pupils the importance of rejecting violence as a means of resolving conflict
- We offer the pupils a range of avenues through which they can express their feelings about the College, including bi-annual surveys.
- Pupils throughout the College are taught about digital literacy and staying safe online, under the leadership of the Head of Educational Technology working in conjunction with the Designated Safeguarding Lead
- We regularly review and evaluate our College policies relating to unacceptable behaviour and conflict resolution
- We give pupils opportunities to understand, and strategies for, coping with, stress. This is done via the tutorial programme, the College's house system and the Wellbeing curriculum.
- Pupils in the Senior School attend regular workshops lead by E.L.G. on topics including healthy relationships and drug education.
- Parents are also given the opportunity to further their knowledge with regards to emotional literacy, through a programme of parental talks and workshops.
- Pupils are educated on the avenues of support available to them through the Pupil Services team including coaching, counselling and different forms of therapy.
- The College keeps up to date with current issues in Safeguarding and Child Protection through its links with Wellington College China, Wellington College in the UK and external consultants.



## **Staff Education**

- We maintain a culture where pupils see staff challenge inappropriate behaviour. We never dismiss incidents as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” (Keeping Children Safe in Education, 2022).
- We maintain a culture of “it could happen here” where safeguarding is concerned.
- We provide regular child protection training to both academic and non-academic staff. Training is comprehensive and recognised by international accreditation bodies such as COBIS.
- All staff, academic and non academic, have logins to MyConcern and are able to refer concerns.
- All ancillary staff undergo a police check and undergo safeguarding training, completed in Mandarin. This is overseen by the DSL in conjunction with the Enrichment Manager, Operations Manager and is aligned with Wellington College China procedures.
- Volunteers working at the College are made aware of the College’s child protection policies and procedures. Volunteers are supervised by a recognised member of college staff at all times.
- All external contractors and volunteers must wear a security pass at all times when on site.
- Staff are asked to challenge anyone on site who looks unfamiliar or is not wearing the necessary security pass.
- This process is carried out annually during staff induction at the start of the academic year. Staff commencing employment at a different time of year will complete this process as part of their induction.

## **Parent Education**

- The College Safeguarding & Child Protection Policy is available to all parents.
- When on site parents are required to wear their ID cards and to observe the boundaries of the teaching spaces. Parents are allowed freely into the public areas, such as the V&A but they are not allowed unaccompanied into teaching spaces.
- A range of parental talks and workshops are offered throughout the academic year by all sections of the College.

- Parents, for whom the UK standards are not well known are invited to work with the College in this understanding. The College obliges parents to understand the laws of China in this regard, while we work to direct parents to the UK government framework within which we work.

### **Record Keeping**

- We keep secure online records.
- We maintain records on any reported safeguarding and child protection issues. These can only be accessed by the DSL team.
- We have clear records of pupils' progress and maintain sound policies on confidentiality.
- We provide information to other professionals, submitting reports to case conferences and attending case conferences only when absolutely required.

### **Review of Procedures**

- We review annually our existing child protection procedures and safeguarding policy.
- Staff are informed of any changes in the revised version.

## 4. ROLES AND RESPONSIBILITIES

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

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

<b>Role</b>	
WCC Safeguarding Governor	Julian Jeffrey Julian.Jeffrey@wellingtoncollege.cn
WCC Safeguarding Lead	Basia Lubaczewska Basia.Lubaczewska@huillieducation.cn
WCC Safer Recruitment	Rowan Bell Rowan.Bell@wellingtoncollege.cn
Safeguarding Consultant	International Child Protection Advisors (ICPA) www.icpa.co.uk

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

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

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

#### **4.1 Executive Board**

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

#### **4.2 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

#### **4.3 Safeguarding Governor**

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

The nominated governor will:

- Work closely with the WCC safeguarding lead
- Discusses safeguarding matters with each DSL periodically
- Review the outcome from annual audit of safeguarding procedures report to the Executive Board highlighting the effectiveness and implementation of relevant policies; staff safeguarding training; staff recruitment procedures; the handling of

safeguarding issues; referral management; and the provision for teaching pupils how to keep themselves safe.

- Manage allegations made against the Master of a WCC school
- Provide guidance to schools that are managing an allegation and communicate with other governors.

#### **4.4 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.

#### **4.6 The 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 the DSL and assist with appointments of Deputy Designated Safeguarding Leads
- 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.

#### **4.7 The Designated Safeguarding Lead (DSL)**

The Designated Safeguarding Lead (DSL) takes lead responsibility for all safeguarding 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 team of Deputy DSLs, 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:

##### **4.7.1 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 with the Head of Educational Technology to develop a robust e-safety programme

#### **4.7.2 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, in conjunction with the Master
- Refer cases where a crime may have been committed to the police
- Maintain detailed, accurate, secure written records of concerns or referrals
- 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.
- Work with the Director of Admissions

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

#### **4.8 Deputy Designated Safeguarding Leads (DDSL)**

DDSLs are trained to the same standard as the DSL and, in the absence of the DSL, can carry out the duties listed above on a day to day basis. In the event of a long-term absence of the DSL, a deputy will be appointed to assume responsibility for all the activities described above. DDSLs have oversight of the day to day management of safeguarding concerns within a specified section of the College. There are also appointed bi-lingual members of the Safeguarding Team, trained to the same standard, who can assist with managing cases where parents do not speak English fluently, or pupils feel more comfortable discussing matters in their native language. The Head Nurse is also trained to this level, ensuring that they and their team are able to be an effective part of the whole College approach to safeguarding.

## 4.9 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 is 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 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 curriculum.
- Staff treat children with respect and all pupils are expected to treat each other and staff with respect. The Pastoral Team 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

## 5. PROCEDURES

Our College procedures for safeguarding children are in line with UK procedures, primarily set out in *Keeping Children Safe in Education* (Sept. 2022) but will also refer to other documents where appropriate.

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.

### 5.1 Safer recruitment

We follow relevant guidance in *Keeping Children Safe in Education* (Sept. 2022), Section 3: Safer Recruitment, and from the Disclosure and Barring Service (DBS), or similar organisations across the world:

- We will ensure specific governors and staff on recruitment panels undertake all appropriate safer recruitment training as outlined in *Keeping Children Safe in Education* September 2022
- Our selection and recruitment policy will include all appropriate checks on staff and suitability including DBS/ICPC checks or local equivalent. With regards 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 our College who have access to children have been checked as to their suitability as outlined in *Keeping Children Safe in Education* September 2022
- 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.

## 5.2 Reporting Procedure

Staff should report any concerns they have about a child using MyConcern, which is the College's online platform for managing safeguarding concerns. Appendices 2 and 3 contain information on how to do this; separate guides are also made available for all staff.

The College also uses the Orah online platform for managing pastoral care.

If staff are unsure which platform to report a concern about a child on, a good rule of thumb is: *is this information which you are happy for all staff to see?* If the answer is 'yes' it should be reported on Orah. If the answer is 'no' it should be reported on MyConcern.

**All staff should remember that if they are in any doubt about whether or where to record information, the most important thing is that the information is recorded somewhere.**

These principles will be followed when dealing with safeguarding concerns:

- Ensure that the safety and wellbeing of the pupil is always at the heart of actions undertaken

*"All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report." (Keeping Children Safe in Education, 2022)*

- 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

- Ensure all staff maintain the attitude that it is better to ‘over report’ on MyConcern
- All staff will have a professional curiosity if they have concerns about a child’s welfare and doing so will help address the fact that “children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful” (KCSIE, 2022).
- Keep clear records of concerns about children, even where there is no need to refer the matter immediately, through MyConcern
- Ensure that all safeguarding concerns and actions taken are recorded and stored on MyConcern. All staff will have training on how to upload a concern, as well as what to do if assigned to be part of the team around the child
- Ensure that parents understand the responsibility placed on the College and staff for safeguarding and child protection by making the policy available to them and sharing safeguarding procedures
- The College will normally seek to discuss any concerns about a child with their parents and gain consent to make a referral or an offer of support. However, if the College believes that notifying parents could increase the risk to the child or exacerbate the problem advice will be taken
- Ensure all members of staff are provided with opportunities to receive basic awareness training (in both English and Mandarin) to understand their responsibilities relating to safeguarding children
- Ensure that all staff members are aware of the systems within the College or which support safeguarding – this should include the safeguarding policy, staff behaviour policy and identify the Designated Safeguarding Lead and should be part of staff induction
- Recognise that all matters relating to child protection are confidential and the Master or Designated Safeguarding Lead 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 children and that they cannot promise a child to keep secrets which might compromise the child’s safety or wellbeing.
- Ensure all staff are 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 cyber bullying)

- abuse in intimate personal relationships between peers physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- causing someone to engage in sexual activity without consent
- consensual and non-consensual sharing of nude and semi-nude images and or videos (also known as youth produced sexual imagery)
- upskirting
- initiation / hazing type violence and rituals

(Keeping Children Safe in Education 2022)

When a safeguarding concern is raised regarding a child whose parent is an employee of WCC, these are always discussed in first instance with the DSL. A decision will be made about who is best placed to support the pupil, considering the nature of the concern and broader circumstances.

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. We will follow any legal requirements of the country in which we and the other school operate. Where the legal position is not clear we will endeavour to make a phone call rather than transfer documentation. In cases where there are any child protection issues, we will 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.

### **5.3 Allegations**

#### **5.3.1 Allegations against school staff:**

Staff must protect themselves and staff should bear in mind that even perfectly innocent actions can sometimes be misconstrued. It is important not to touch pupils however casually, in a way that may be considered unnecessary in relation to the pupil's age, individual needs and any agreed care plan. Further guidance can be found in the Physical Contact Policy. Staff should never be in a position where they are left alone with pupils in private spaces.

Low level concerns, which may not meet the threshold for a full referral, still must be reported to the DSL or the Master. These can include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

(Keeping Children Safe in Education 2022)

Staff must not be connected with pupils on any social media forum. This includes messaging apps like WeChat. This includes when pupils leave the College. If there is any doubt or staff are unsure, please speak to a member of the safeguarding team.

The only exception to this is during the time of a school trip when permission may be sought to use WeChat or equivalent to ensure safer trip organisation. If staff feel this is absolutely necessary, authorisation must be sought well in advance, directly from the DSL or Master. Permission will not be granted if an alternative is available. Staff should disconnect with pupils as soon as the trip is completed; this process will be carried out in conjunction with the DSL. Staff may not be connected with former pupils until they are 21 years old and have not been at the school for at least 3 years.

The College has procedures for dealing with allegations against staff and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations.

The following definitions should be used when determining the outcome of allegation investigations:

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to prove or disprove the allegation.

The term, therefore does not imply guilt or innocence.

When pupils make such an allegation against a member of staff, the procedures must be followed as far as possible:

1. The Master should be informed immediately. The Master and the DSL will immediately discuss the allegation. This is important for the protection of the member of staff as well as the pupil.
2. The initial sharing of information and evaluation may lead to a decision that no further action should be taken with regard to the individual facing the allegation or concern, in which case the decision and its justification should be recorded by the Master.
3. The Master should inform the accused person about the allegation as soon as possible, providing them with as much information as possible at the time. However, where a strategy discussion is needed or Police need to be involved, the Master should not make a decision until those agencies have been consulted and have agreed what information can be disclosed to that person.
4. At this point a decision will be made as to whether that person will be suspended from their duties. Suspension will be considered if there is cause to suspect that pupils at the College are at risk from significant harm, or if the allegation warrants investigation by police.
5. If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened.

Teachers who are the subject of an allegation of this nature will invariably feel threatened and isolated. It is essential to seek legal advice as soon as possible and teachers should be represented at all disciplinary hearings. Suspension in a case of this kind is a procedural step only and must be viewed as a neutral action that does not presuppose guilt or innocence.

### **5.3.2 Allegations against pupils:**

A pupil against whom an allegation of abuse has been made may be suspended from the College during the investigation and the School's policy on behaviour, discipline and sanctions will apply.

Support must also be given to the member of staff or pupil who has listened to the young person after speaking to them and making the referral to the DSL team. They may need support to talk through what has happened and counselling is available if required.

The following points outline the procedure that the College will take if an allegation of abuse is made against another pupil.

- The DSL should be informed immediately, who will liaise with the Master
- An investigation will be carried out, which will be led by the Master/DSL in conjunction with the pupils' HMs or class teacher as decided by the Master/DSL.
- The immediate safety of the victim will be considered and a safe place provided (i.e. Medical Centre).
- Both sets of parents will be informed.
- Support will be offered to both individuals
- Following investigation, an appropriate way forward will be deduced in line with the College policy on behaviour, safeguarding and child protection.

### **5.3.3 Acting on Concerns Regarding an Adult's Behaviour:**

If you have any concerns about an adult's behaviour towards children or young people:

- Do not ignore it – the College will take any concerns very seriously.
- You must discuss your concerns with the Master, who alongside the DSL will support you in liaising with the statutory agencies should any child protection matter arise.
- Do not confront the adult but seek the advice of the Master. If they are not available contact the DSL.

### **5.3.4 Acting on a Disclosure from an Adult that they are involved in the abuse of a child or young person:**

If someone not employed by the College discloses that they are involved in the abuse of a child or young person, you must take action:

- Believe what they are saying and take the allegation seriously.
- Record details of what you have been told as soon as possible.
- Report it to the Master, who will ensure the appropriate actions are taken, also explaining the limits of confidentiality. If they are not available, seek the DSL.



### 5.3.5 Grooming and Entrapment

In the NSPCC briefing on Grooming and Entrapment (July 2012), the definition of grooming is given as *“a process by which an individual prepares a child for abuse. This is usually perpetrated by a significant adult in the child’s life either at home or somewhere else in the child’s environment.”*

Grooming is a conscious, purposeful, and carefully planned approach used by the offender to gain access to the child, gain the child’s trust and compliance and maintain the child’s secrecy to provide opportunities to abuse and reduce the likelihood of being reported or discovered. This process is thought to strengthen the offender’s abusive pattern of behaviour, as it may be used as a means of justifying or denying their actions.

Grooming may also involve the parents of the victim so that that the offender can gain their trust and approval. This will allow the offender to have greater access to the victim and enhanced ability to spend time alone with them. Parents are often pleased about the extra attention the teacher is giving their child, perceiving them as a positive authority figure and role model for their child. However, offenders may also carefully groom victims by systematically separating them from family and peers. The offender may come to represent the closest relationship the victim has, particularly if the victim is socially isolated or emotionally vulnerable. In such cases, the victim may be reticent to give up what he or she views as a “loving” relationship. Once isolated, victims are more easily exploited and manipulated into sexual relationships.

Some potential warning signs of grooming as a precursor to sexual abuse include:

- A pupil receiving special attention or preferential treatment
- Excessive time spent alone with a pupil outside of the classroom
- Frequently spending time with a pupil in private or isolated areas
- Transporting a pupil possibly to or from school
- Making friends with a pupil’s parents and visiting their home
- Acting as a particular pupil’s “listening ear”
- Giving small gifts, money, toys, cards, letters to a pupil
- Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a pupil
- Overly affectionate behaviour with a pupil

- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a pupil
- Other pupils are suspicious and make jokes or references

### **5.3.6 Child Sexual Exploitation (CSE)**

Child sexual exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

### **5.3.7 Children staying with host families**

The College does not allow pupils to stay with host families. Hotels with supervision by College staff are appropriate for school trips and should be the default option.

## 6. 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 2022)
- Guidance for Safer Working Practice for Adults who Work with Children and Young People
- Disclosure and Barring Service Guidance

## 7. APPENDICES

### Appendix I: China Laws and Conventions Guiding the Child Protection Policy

#### 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, 2012: Article 5:**

In the protection of minors, the following principles shall be followed: (1) respecting the personal dignity of minors; (2) following the laws which govern the minors' physical and mental development and the characteristics of such development; and (3) combining education with protection. Standing Committee of the National People's Congress, Law of the People's Republic of China on the Protection of Minors (2012 Revision) Order of the President No.65 PRC.

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

In 2015, a new 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:

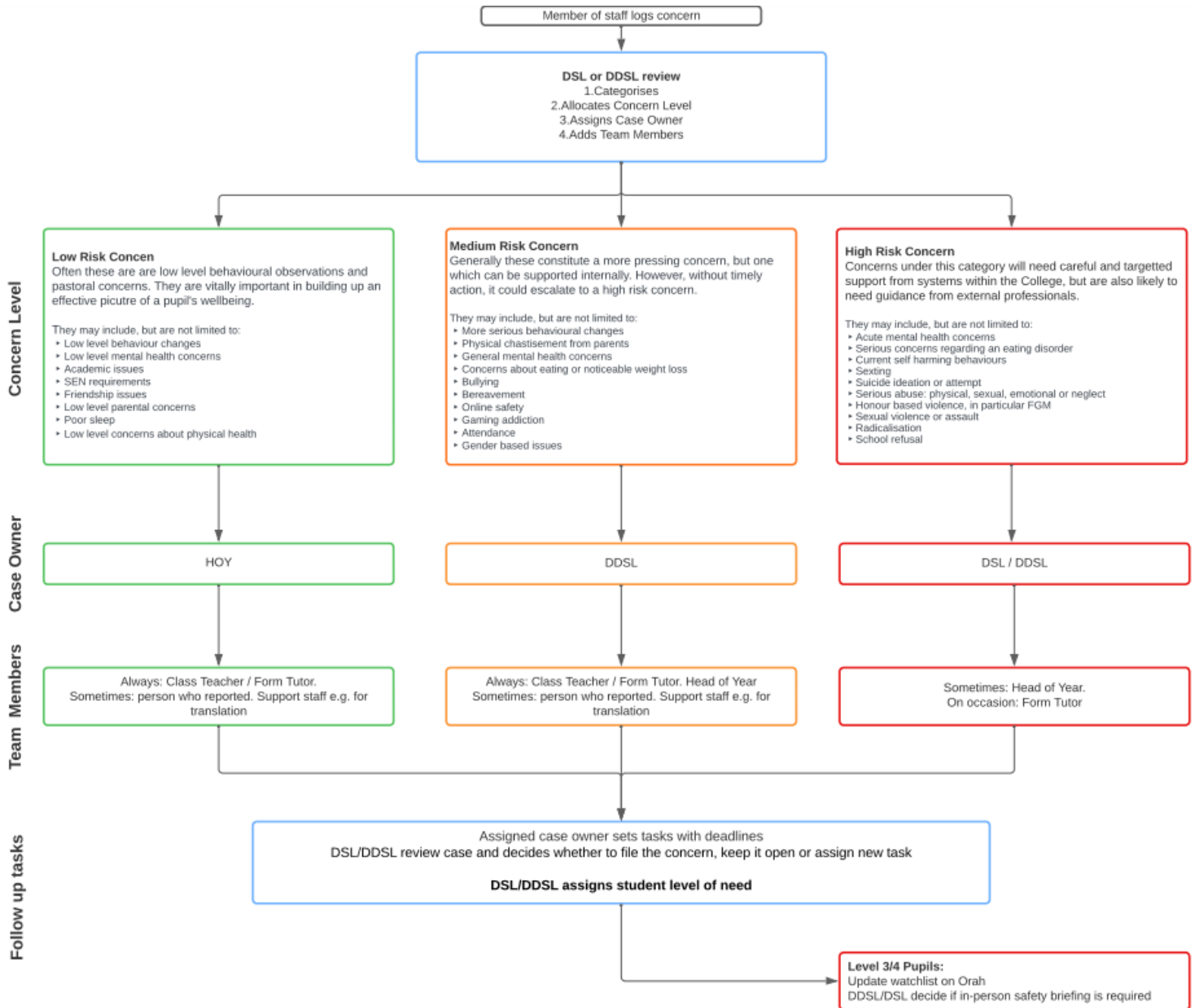
**Article 14:** Schools, kindergartens, medical institutions, residents' committees, villagers' committees, social service agencies, aid management agencies, welfare agencies and their staff members shall promptly report cases to public security organs if they find, during the course of their work, that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

**Article 35:** Where a school, kindergarten, medical institution, residents' committee, villagers' committee, social service agency, aid management agency, welfare agency and its staff members fail to report a case to a public security organ in accordance with Article 14 herein, resulting in serious consequences, the person directly in charge and other persons subject to direct liabilities shall be given disciplinary sanctions pursuant to the law by the relevant superior competent department or their own employer. Standing Committee of

the National People's Congress, (2015) Anti-domestic Violence Law of the People's Republic of China. Order No.37 of the President, PRC.

# APPENDIX 2

## Flowchart for raising safeguarding concerns about a child



## **APPENDIX 3**

### **MyConcern – How to add and update an entry**

#### **What should NOT go on MyConcern?**

- Any low-level pastoral incident / concern – use Orah to record.
- Any safeguarding concerns about a member of staff – speak / communicate with DSL or Master
- Anything which you are ‘self-reporting’

**If in doubt, remember that the most important thing is that the information is recorded somewhere.**

#### **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 child-on-child 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**

1. Log in at <https://www.myconcern.education>.  
*Alternatively you can click on the MyConcern icon on the school homepage for staff, and at the bottom of The Week Ahead emails sent out to staff.*
2. Click on “Report a Concern”
3. Fill in the details on the “Report a Concern” page, remembering these important points:
4. The concern summary should be brief – a couple of words only. Eg. “Injury to right leg”; “Bullying”; “Possible drugs use”
5. The concern should be assigned to the relevant section of the College. If you are unsure, assign it to ‘Designated Safeguarding Leads’.
6. 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
7. 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
8. Attachment – you can attach documents to the entry. It might be a copy of some hand written notes, a piece of work that a pupil has written that you are concerned about, something which you have found (eg a note / piece of paper which is concerning) When you are happy, press “submit concern”

### **How to update a concern**

Log in at <https://www.myconcern.education>.

*Alternatively you can click on the MyConcern icon on the school homepage for staff, and at the bottom of The Week Ahead emails sent out to staff.*

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:

- Heads of Year (almost always)
- Form Tutors or Class Teachers (usually, depending on the case)

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 31/01/19”.

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.

### **What to do if you don't have access to a computer**

The safety and wellbeing of the pupil is always our foremost concern.

There may be times when pupils disclose to staff when away from classrooms or offices, for example on the sports field.

In circumstances like this, staff should make every effort to record details of the disclosure, when appropriate, on either paper or an electronic device.

Staff should ensure they write in factual language, recording as much as is possible, as they would when reporting on MyConcern. Attention should be paid to names, dates, times and factual detail recounted, aiming to use the words used by the pupil.

This document, whether physical or electronic, should be handed to the DSL as soon as is possible, who will ensure that it is stored safely and securely. Under no circumstances should a staff member leave the school site with the document. If this situation occurs away

from the College, for example on a school trip, the trip leader will have the DSL's mobile number and will make contact to discuss further steps.

Under no circumstances should a copy be stored for any length of time than is longer than necessary on an electronic device. The DSL will take responsibility for helping the staff member to ensure it has been deleted from the device's local storage, as well as cloud storage.

## **APPENDIX 4**

### **Categories of Abuse**

*As defined by Keeping Children Safe in Education, September 2022.*

Abuse is defined as 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. Children may be abused by an adult or adults or by another child or children.

#### **Physical abuse**

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

#### **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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

## **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it.

## **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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Domestic Abuse**

Children can be the victims of domestic abuse. They may see, hear or experience the effects of living in a home where domestic abuse occurs. They can also experience domestic abuse in their own intimate relationships. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

## **Child Sexual Exploitation and Child Criminal Exploitation**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

### **Child-on-child Abuse**

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

Child-on-child abuse 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 peers;
- 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;

- 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).

## APPENDIX 5

### Signs of Child Abuse

#### 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>soils clothes</li><li>takes risks</li><li>misses school</li><li>changes in eating habits</li><li>obsessive behaviour</li><li>nightmares</li><li>drugs</li><li>alcohol</li><li>self-harm</li><li>thoughts about suicide</li></ul>
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#### Neglect

##### Appearance / hygiene:

- be smelly or dirty
- have unwashed clothes
- have inadequate clothing, e.g. not having a winter coat
- seems hungry e.g. turning up to school without having breakfast or any lunch money
- have frequent and untreated nappy rash in infants

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

##### Housing

- living in an unsuitable home environment (eg not having any heating)
- left alone for a long time
- taking on the role of carer for other family members



## **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 for their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents
- lack social skills or have few, if any, friends

## **Sexual Abuse**

Staying away from certain people:

- 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.

Showing 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.

Have physical symptoms:

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

## APPENDIX 6

### 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 DDSL or DSL, based on the criteria listed below.

Level	Needs of Pupil	Examples of Support	Other Comments
<b>1</b>	<p><b>Low level pastoral concern</b></p> <p><i>This pupil primarily needs monitoring to ensure that a low-level concern does not develop into a larger issue.</i></p> <p>The pastoral team will speak about the pupil at their meetings and be primarily responsible for support, with some oversight from DDSLs if required.</p> <p>Examples may be initial concerns regarding:</p> <ul style="list-style-type: none"> <li>• Low level behaviour changes</li> <li>• Low level mental health concerns</li> <li>• Academic issues</li> <li>• SEN requirements</li> <li>• Friendship issues</li> <li>• Poor sleep</li> <li>• Low level concerns about physical health</li> </ul>	<p><b>Universal College Support</b></p> <p><i>Personalised adaptations of widely available whole College support systems.</i></p> <p>The pupil will be offered support by relevant individuals.</p> <p>This might be:</p> <ul style="list-style-type: none"> <li>• Class Teacher</li> <li>• Form Tutor</li> <li>• Sports Coach</li> <li>• A member of staff with whom they have a good relationship</li> <li>• Head of, or member of, the Learning Support team</li> <li>• A member of the Pupil Services team</li> <li>• Housemaster</li> </ul> <p>This pupil will be discussed regularly by the pastoral team.</p> <p>The DSL/DDSL will offer advice when required.</p>	<p>Class Teachers / HMs will likely take the lead on managing these pupils, with some input from the DDSL.</p> <p>DDSLs should ensure that Class Teachers / HMs have full sight of concerns regarding the pupil on MyConcern, ensuring they can build up a full picture of their needs.</p> <p>Class Teachers/HMs should be confident in utilising MyConcern to add updates periodically on the pupil's progress.</p>
<b>2</b>	<p><b>Higher level concern</b></p> <p><i>This pupil will need to be closely monitored, making use of the general support offered within the pastoral system and is likely to need access to an additional service within the College. Parents may also seek pre-emptive support outside the College.</i></p> <p>They may be vulnerable individuals who are showing signs of not flourishing, either in the College or at home. Support is</p>	<p><b>Early College Support</b></p> <p><i>Widely available support systems working together with potentially some in College targeted support.</i></p> <p>The pupil will be supported by the relevant individuals listed for Level 1 concerns but are likely to be supported by a College specialist. These could include:</p> <ul style="list-style-type: none"> <li>• Head of Pupil Support</li> <li>• College Counsellor</li> <li>• A specialist Coach.</li> </ul>	<p>The Class Teacher/HM should be in communication with the relevant DDSL regarding the pupil's progress. This should be added to MyConcern, where appropriate.</p> <p>The DSL will support the DDSL to offer advice and guidance where needed.</p>

	<p>required to ensure they reach their full potential.</p> <p>This pupil will need close monitoring regarding higher level concerns which could include:</p> <ul style="list-style-type: none"> <li>• Behaviour changes</li> <li>• Mental health concerns</li> <li>• Significant academic issues</li> <li>• SEN requirements</li> <li>• Friendship issues</li> <li>• Poor sleep</li> <li>• Physical health</li> <li>• Concerns about eating or noticeable weight loss</li> <li>• Bullying</li> <li>• Bereavement</li> <li>• Sexual harassment</li> <li>• Online safety</li> <li>• Gaming addiction</li> <li>• Sexting</li> <li>• Attendance</li> <li>• Gender based issues</li> </ul>	<ul style="list-style-type: none"> <li>• A CBT trained member of staff.</li> <li>• Director of Pupil Services</li> </ul> <p>The DDSL will take oversight of monitoring their progress and directing support.</p> <p>The family may choose to access external help, but if this is so the DDSL should ensure that the College is aware of the service being accessed, making an attempt to establish lines of communication between the parents, the services and the College.</p>	
3	<p><b>Intensive support</b></p> <p><i>This pupil will require significant support due to complex concerns. This pupil will likely be dealing with a sole serious issue, or multiple long-term issues. They will require targeted support in the College and in most cases, support from an external source too.</i></p> <p>They will require significant, targeted support for concerns which could include:</p> <ul style="list-style-type: none"> <li>• Significant behaviour issues</li> <li>• Mental health: anxiety, depression or suicidal ideation</li> <li>• A diagnosed mental health illness</li> <li>• Significant academic issues</li> <li>• SEN requirements</li> <li>• Friendship issues</li> <li>• Poor sleep</li> <li>• Serious physical illness</li> <li>• Eating disorders</li> <li>• Significant bullying</li> <li>• Bereavement: parent or sibling</li> <li>• Sexual harassment</li> <li>• Online safety</li> <li>• Gambling</li> </ul>	<p><b>Targeted College Support</b></p> <p><i>A full targeted approach utilising the College's support services, supplemented by external help.</i></p> <p>Support will be as per Level 2 concerns, but with parents/carer instructed to seek external help which may include:</p> <ul style="list-style-type: none"> <li>• A specialist counsellor</li> <li>• A psychologist or psychiatrist</li> <li>• A family support service</li> </ul> <p>The College will provide a list of recommended services and the DSL/DDSL should ensure efforts at communication are made.</p> <p>The pupil will be regularly discussed by the DSL and DDSL at fortnightly meetings.</p> <p>In some cases, the DSL may manage the case.</p> <p>Unless there is reason not to, it is likely to be in the pupil's best interests that they are</p>	<p>The DDSL or DSL will take ownership of directing support within the College.</p> <p>Parents should be aware of support being offered, unless doing so places the child at more risk. This decision should be made in conjunction with the DSL, if there are doubts.</p> <p>MyConcern tasks should be used to ensure the chronology of the child's support is as thorough as possible.</p> <p>The DSL will ensure that the Master and the SLT are appropriately aware of the pupil's needs.</p>

	<ul style="list-style-type: none"> <li>• Sexting and risky sexual behaviour</li> <li>• YPSI</li> <li>• Attendance</li> <li>• Gender transition</li> <li>• Dangerous behaviour</li> </ul>	flagged to their teaching staff as a pupil to watch closely.	
4	<p><b>Significant, serious and urgent level of need</b></p> <p><i>This pupil is likely to be enduring circumstances where they are suffering or are likely to suffer significant harm. The pupil may pose a significant risk to themselves or of serious harm to others. They are in need of specialist support and intervention, likely to be beyond the capability of the College. It is likely that access to external services will be required to ensure the pupil can flourish at the College.</i></p> <p>Issues likely to be in this category are, but not limited to:</p> <ul style="list-style-type: none"> <li>• Serious concerns regarding an eating disorder, where in patient support may be required.</li> <li>• Suicide attempt</li> <li>• Suicidal ideation with intent, as deemed by an external evaluation</li> <li>• Acute mental health concerns diagnosed by psychiatric assessment</li> <li>• Serious abuse: physical, sexual, emotional or neglect</li> <li>• Honour based violence, in particular FGM</li> <li>• Sexual violence or assault</li> <li>• Radicalisation</li> <li>• Absconding</li> </ul>	<p><b>Specialist Support</b></p> <p><i>High level specialist interventions, primarily led by external agencies.</i></p> <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>• Medical professionals, in particular if in an in-patient setting</li> <li>• Counselling</li> <li>• Psychiatrists</li> <li>• Psychologist</li> </ul> <p>The DSL will oversee the pupil's care, directing staff and communicating with external agencies.</p>	<p>The DSL will ensure that an appropriate team around the child is in place and appropriate services are engaged. A full analysis of risk factors will be considered.</p> <p>External support will guide the College's support, in conjunction with the DSL.</p> <p>The parents shall be fully aware of the needs of the pupil and the services on offer. The DSL shall consider, in conjunction with the SLT, whether a pupil's continued access to support is deemed necessary to continue learning at the College, to keep the pupil and those around them safe.</p> <p>The Master and the SLT will be aware of the pupil's needs. The WCC Lead and the Safeguarding Governor will be informed.</p>

## **APPENDIX 7**

### **Managing Allegations against staff**

#### **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.

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 DSL or DDSL then the matter should be reported to the Master.

If the allegation involves 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 WCC Safeguarding Lead, Basia Lubaczewska.

### **Action to be taken by the Master (or case manager)**

All allegations must be dealt with as a priority so as to avoid delay. The Master (or case manager) will immediately discuss the matter with the DSL before further action is taken. 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 in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by the DSL (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 DSL (or case manager) may, in consultation with the Master, 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 after the Master has been consulted. 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).

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 of 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:

<b>Outcome Type</b>	<b>Definition</b>	<b>Action after investigation</b>	<b>Recording</b>
<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
<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.	
<b>Unsubstantiated</b>	This is not the same as a false allegation. It means that there is insufficient evidence		

	to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.		personnel file of the accused, and a copy provided to the person concerned The record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.
<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 have been 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 8

### Exemplar referral/concern form if you are unable to register the concern via MyConcern



WELLINGTON COLLEGE  
CHINA  
惠灵顿(中国)

**CONFIDENTIAL**

#### Safeguarding Concern Form (SCF) 2022-23

**Please complete immediately and hand in person to one of the Safeguarding Team:** *Robbie Davies, Charlie Knight-Benjafield, Martin O'Brien, Penny Lewis, Craig Northedge, Dan Eldred, Michelle Speight, Michael Orchard, Lucy Qu*

Date of concern:

Your Name:

Department:

Your Email:

#### Who are you concerned about?

Name (s):

House(s) / Year(s)

**Full details/ Notes/Records/ Describe your concerns/insert quotes by child:**

Signature:

Date:

## **APPENDIX 9**

### **Critical Incident Reporting Timeline**

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 24h, who will advise on next steps regarding the investigation of the case. This meeting, less than 24h 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 72h/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.

24 Sept 2021

WCC DSL Network (TCR; DM; PM; RD; CKB; BL)

Reviewed by HK, RB, FC

## APPENDIX 10 Suggested Support Services in Shanghai

The services listed below have previously used by pupils at the College and come recommended. If you are unsure about who is best placed to help, then please do discuss it with us. If you do approach any of the in-person services below, it is helpful if you offer your consent for them to communicate with us directly. They will not reveal personal insights and confidential information but will guide the College on how best to ensure the wellbeing of your son/daughter whilst in our care.



WELLINGTON COLLEGE  
INTERNATIONAL  
SHANGHAI

Name	Contact	Description
Lifeline	400 821 1215 www.lifeline-shanghai.com	A well-known Shanghai organisation whose highly trained staff offer someone for people to talk to, from 10am – 10pm, 365 days/ year. It is completely free. English Speaking (no Mandarin) There is also a WeChat service
MindFront	<a href="https://mindfront.com/en/home">https://mindfront.com/en/home</a>	A newly opened facility with an impressive range of support available, both in Chinese and English. They have a full range of psychotherapy and psychiatric services, in a newly opened space in Puxi, designed specifically for their needs.
The Community Center Shanghai	(21) 136 3631 7474 counselling@communitycenter.cn WeChat: CCS-counseling www.communitycenter.cn/counseling	Provides a diverse team of qualified counsellors from around the world. They are very experienced in working with adolescents.
Shanghai United Family Pudong Hospital	400-639-3900 WeChat: PDU-MH <a href="https://pudong.ufh.com.cn/locations/pudong-hospital">https://pudong.ufh.com.cn/locations/pudong-hospital</a>	A diverse number of services are available in a range of languages, including psychiatric advice, psychological assessments and counselling services. Their work can be for children or families as a whole.
Olivia's Place - Shanghai	021-6075-3100 or 021-5404-0058 Contact@lih-oliviasplace.com www.oliviasplace.org	Provides multi-disciplinary paediatric therapy services to children of all ages and abilities. Their psychologists and counseling term are well respected in the community and are experienced with working with adolescents.
Parkway Health	400-819-6622 WeChat: ParkwayHealth	A range of psychiatrists, psychologists and counsellors who have experience in dealing with children and teenagers. They offer their services in multiple languages.

<p>Sino United</p>	<p>400-186-2116  contact@sinounitedhealth.com  WeChat: SinoUnited Health</p>	<p>One of the largest medical providers in Shanghai, Sino have a number of different psychiatric and psychological services on offer, with locations across the city.</p>
<p>Jiahui Health</p>	<p>400-868-300  WeChat: Jiahui Health  <a href="https://www.jiahui.com/en/service/22">https://www.jiahui.com/en/service/22</a></p>	<p>Jiahui Health has a team of professional mental health clinicians, including psychiatrists and psychotherapists who provide psychological assessment, prescription medication and psychotherapy</p>
<p>Educate, Learn, Grow (ELG)</p>	<p><a href="http://www.chinaelg.com">www.chinaelg.com</a></p>	<p>Provides a range of support services for children and families. Very experienced in the Shanghai community and have a history of working with Wellington College China.</p>