



WELLINGTON COLLEGE
INTERNATIONAL
TIANJIN

Safeguarding Policy 2023-24

Person Responsible for Policy: Ed Batey

Date Approved by Governing Body: 4 November 2021 for the current version, revised version to be ratified at the SCPSC meeting on 10th November 2022.

The Policy is to be reviewed annually

Key Contacts

Role	Person	email
Designated Safeguarding Lead (DSL)	Ed Batey	Edward.batey@wellingtoncollege.cn
Deputy DSL (DDSL)	Rita Zhao	Rita.zhao@wellingtoncollege.cn
Senior School Safeguarding Officer	Yvette Peden	Yvette.Peden@wellingtoncollege.cn
Junior School Safeguarding Officer	Lucia Wang	Lucia.wang@wellingtoncollege.cn
Junior School Safeguarding Officer	Melissa Meyers	Melissa.Meyers@wellingtoncollege.cn
Junior School Safeguarding Support	Tina Liu	Tina.Liu@wellingtoncollege.cn
Nest Safeguarding Officer	Jan Bennett	Jan.Bennett@wellingtoncollege.cn
Nest Safeguarding Support	Jordan Zhao	Jordan.Zhao@wellingtoncollege.cn
Boarding Housemaster	Eliud Juma	Eliud.Juma@wellingtoncollege.cn
Non-academic Lead	Vera Wang	Vera.Wang@wellingtoncollege.cn
E-safety Lead	Angel Li	Angel.Li@wellingtoncollege.cn
Whole School Safeguarding Support	Emma Shi	Emma.Shi@wellingtoncollege.cn
Safeguarding Governor	Julian Jeffrey	Julian.Jeffrey@wellingtoncollege.cn
WCC Safeguarding Lead	Role temporarily filled by the Safeguarding governor	

CHANGES TO THE POLICY FROM 2023-24

- (i) Details of the new DSL, Junior School Safeguarding Support, Whole School Safeguarding Support, Safeguarding Governor and WCC Safeguarding Lead updated
- (ii) The document reflects the updated guidance from *Keeping Children Safe in Education (KCSIE)* (Sept 2023 edition)
- (iii) KCSIE 2023 has updated guidance for filtering and monitoring pupils' access to online material
- (iv) Updates to PRC laws and regulations pertaining to child protection and safeguarding (pp 46-47)

POLICY REVIEW

The Governing 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 2018](#)
- Keeping Children Safe in Education 2023
- “[Guidance for Safer Working Practice for Adults who Work with Children and Young People](#)”
- Disclosure and Barring Service Guidance.

Policy adopted: August 2018

Policy Reviews by TCR: August 2019, August 2020, August 2021, Dec 2021,

Policy Review by RA: October 2022

Policy Review by EJB: October 2023

Next Policy Review: August 2024

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I. Rationale

Wellington College International Tianjin (WCIT) 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 2023).

Wellington College International Tianjin (the College) and the governing body are clear about their responsibilities in relation to safeguarding and promoting the welfare of children. We adhere to local safeguarding legal requirements and adhere to and apply UK standards of safeguarding practice within the context of the school. Wellington College International Tianjin also seeks to meet all standards required by the 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 College child-centred approach is informed by the *United Nations Convention on the Rights of the Child. This applies to any child at WCIT school 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.

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

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 and neglect are adopted from the *Keeping Children Safe in Education 2023* DfE statutory guidance for Schools and Colleges and include:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

2. Aims and Objectives

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

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

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

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

Pupil Education

- We aim to create an environment and ethos in which children feel secure, their viewpoints are valued, they are encouraged to talk and they are listened to.
- We provide suitable support and guidance so that pupils have a range of appropriate adults and trained senior pupils whom they feel confident to approach if they are in difficulties. This is displayed via posters in all Houses. Pupils are also regularly advised about avenues of support through assemblies, wellbeing lessons and tutorials. All HM's also highlight these individuals to the pupils in their houses at the start of each academic year.
- We use the College's curriculum to raise pupils' awareness and build confidence so that they have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.
- All senior pupils are briefed by the Designated Safeguarding Lead, or one of the assistants, at the start of each academic year with regards to their seniority within the school and the College child protection & safeguarding procedures and policy.
- All pupils from Year 3 up are educated about digital citizenship throughout their time at Wellington College International Tianjin. They also receive education about being safe online through the Positive Education Enhanced Curriculum (PEEC) and Digital Citizenship teaching.
- Staff treat the children with respect and all pupils are expected to treat each other and staff with respect. Our policy on bullying is available to all via the website and is regularly reviewed. The Pastoral and Safeguarding Lead also talks to all year groups on an annual basis. The College also undertakes a regular 6 monthly PASS or "How are You?" surveys in October and April. Questionnaires are also carried out as part of the Annual Review, Positive Community week and Mental Health Awareness Weeks and then fed back to SMT to determine future action.
- We look carefully at the role models the College offers pupils 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 and are leading other schools in the use of restorative justice techniques when dealing with pupil conflict as well as staff issues. Coaching and restorative friendship building approaches are used in disciplinary matters in order to educate the individual and to initiate responsibility and reparation from the child concerned. They are encouraged to take ownership over their actions.
- We regularly review and evaluate our College policies and practices of social control and behaviour modification.
- We give pupils opportunities to understand, and strategies for coping with, stress. This is done via the tutorial programme and the well-being curriculum. Parents are also given opportunities to further their own education in this area as part of the parents' programme of pastoral talks, with regular sessions on SEAL education, parenting skills and safeguarding workshops in English/Korean and Mandarin;
- Senior pupils (House Prefects and College Prefects) are given posts of responsibility that give them a pastoral role and they are briefed on the appropriate action to take if they receive information pertaining to abuse or of a more general 'pastoral nature'. The Heads of House in Juniors are members of the School Positive Community Group who meet weekly to raise any general safeguarding concerns with members of the full Student Council.
- 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.

3. Roles and Responsibilities

Wellington College China (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 delivered.

There are seven main elements to in the Policy:

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

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

Role	Person
WCC Safeguarding Governor & Lead	Julian Jeffrey Julian.Jeffrey@wellingtoncollege.cn
WCC Safer recruitment	<i>Role temporarily filled by the Safeguarding governor</i>
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.

3.1 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.

3.2 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
- Safeguarding is a standing agenda item on the agenda of each ASC meeting

3.3 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

- 1x SAB Members (Chris Woolf)
- TWC external expert
- CEM (as Safeguarding governor)
- 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

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

3.4 Safeguarding Governor

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

- Work closely with the WCC safeguarding lead
- Check the safer recruitment policy and procedures
- 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.

3.5 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.

3.6 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 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.

3.7 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:

3.7.1 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 closely with a local e-safety lead (to be named in the local safeguarding policy) and in line with the central office IT Director.

3.7.2 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
- 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)

3.8 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.

3.9 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 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 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 review regularly 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 from Year 3 up are educated about digital citizenship They also receive education about being safe online through the wellbeing curriculum and Positive Education Enhanced 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

4. Safeguarding Procedures

Our College 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’*. We have adopted *‘Keeping Children Safe in Education’* and will ensure that all individuals we engage to work within our College are made aware of this guidance, read it and sign off that they have read and understood it in MyConcern.

Any concerns raised about any safeguarding issues can also be raised through the Wellington College International Tianjin *Whistleblowing Policy* and with any members of our Safeguarding Team including the Safeguarding Governor for 2023-24, Julian Jeffrey (Julian.Jeffrey@wellingtoncollege.cn)

4.1 Safer recruitment

We will follow relevant guidance in *‘Keeping Children Safe in Education 2023’ (Part three: Safer Recruitment)*; and from The Disclosure and Barring Service (DBS), International Child Protection Certificate (ICPC) or similar organisations across the world:

- We will ensure governors and staff on recruitment panels undertake appropriate safer recruitment training as outlined in *‘Keeping Children Safe in Education 2023’*.
- Our 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;

- Conduct online searches on candidates shortlisted for interview, as outlined in *'Keeping Children Safe in Education September 2023'*;
- 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 2023'*;
- Ensure that all staff and volunteers have read the code of conduct and understand that their behaviour and practice needs 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 staff member has an up-to-date details including Police check recorded on the Single Central Record 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.

4.2 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.

4.3 Low Level Concerns

The College promotes a culture where **all** concerns about adults are shared responsibly using the appropriate pathway, and are recorded and dealt with promptly, even if they do not meet the harm threshold. This should enable the College to:

- identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse early, and
- adults are clear, and act within, professional boundaries.

Low level concerns do not mean that they are insignificant, and can even take the form of a sense of uneasiness and should be recorded in writing and dealt with appropriately and effectively. This will ensure the protection of pupils first and foremost, and also adults from becoming the subject of potential false low-level concerns or misunderstandings.

4.4 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 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 24hrs, who will advise on next steps regarding the investigation of the case. This meeting, less than 24hrs 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 3 days 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.

4.5 Raising awareness and equipping children with skills needed

We recognise that because of the day-to-day contact with children, College 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. The College will therefore:

- The importance of providing early help to pupils to provide support for a problem as soon as it arises, is recognised, in order 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 College whom they can approach if they are worried;
- Embed opportunities in the curriculum (The Wellbeing Programme and Positive Education Enhanced Curriculum- PEEC) and College life for children to develop the skills they need to recognise and stay safe from abuse, including online;
- Raise the awareness of 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. This is done through termly briefings on latest developments in safeguarding policies and procedures;

- Ensure every member of staff (including temporary, supply staff 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.
- The name of the Designated Safeguarding Lead and their deputies will be clearly visible in the College, with a statement explaining the College's role in referring and monitoring cases of suspected abuse and allegations.

4.6 Implementing procedures for reporting abuse

The school 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,¹⁰ 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 videos¹¹ (also known as sexting or youth produced sexual imagery)
 - upskirting,¹² 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 2023

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.

The school uses MyConcern, as a means of managing safeguarding related information.

4.6 Supporting pupils who have been abused

We 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 our Counselling team. This can be in English or Mandarin.
- Recognise that the College 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 children are particularly closely monitored and supported and any concerns are recorded
- Implement a Pastoral Support Plan (PSP) or Individual Education Plan (IEP) for other children where there is a need for specific support in College
- Establish a safe environment which supports all pupils.
- Remain aware 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.

4.7 Establish a safe environment

We will:

- Support the child's development in ways that will foster security, confidence and resilience in every aspect of College life including through the College curriculum
- Provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties by forming trusted relationships
- Ensure that children and young people are educated about the expectations they should have relating to the behaviour of adults who work with them
- Ensure that we provide the best opportunities and support for children to achieve the best outcomes and participate in College life
- Contribute to the wider safeguarding agenda by working with the local community to help our children live in a safe environment
- Recognise that staff working in the College who have become involved with a child 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 Designated Safeguarding Lead and to seek further support
- Ensure that staff are aware of other key issues that relate towards safeguarding children and young people.

These include:

- 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 safeguarding update at the beginning of each term if there are any new initiatives, key issues or policy changes. All training is in dual language, English and Mandarin.

APPENDIX 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.

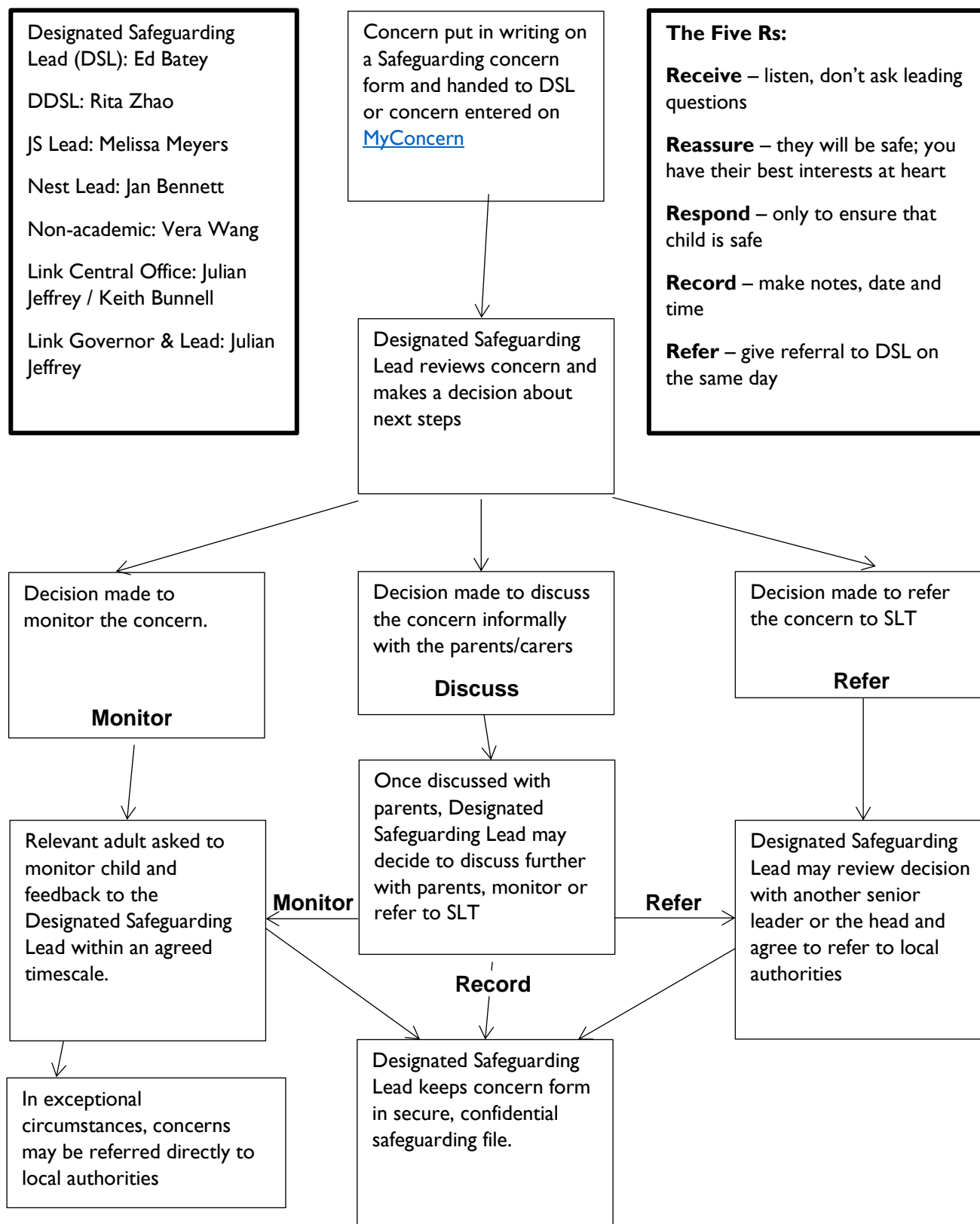
The Convention on the Rights of the Child was entered into force on 2 September 1990.

“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.”

APPENDIX 2

FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



APPENDIX 3

Types of Abuse

3.1 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

3.2 Signs of abuse

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

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

Signs you may notice

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

Appearance / hygiene

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

Health & Development issues

- untreated injuries, medical and dental issues
- repeated accidental injuries caused by lack of supervision
- recurring illnesses or infections
- not been given appropriate medicine
- missed medical appointments such as vaccinations
- poor muscle tone or prominent joints
- skin sores, rashes, flea bites, scabies or ringworm
- thin or swollen tummy
- anaemia
- Tiredness
- faltering weight or growth and not reaching developmental milestones (known as failure to thrive)
- poor language, communication or social skills.

Housing

- living in an unsuitable home environment (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

3.3 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 4

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.

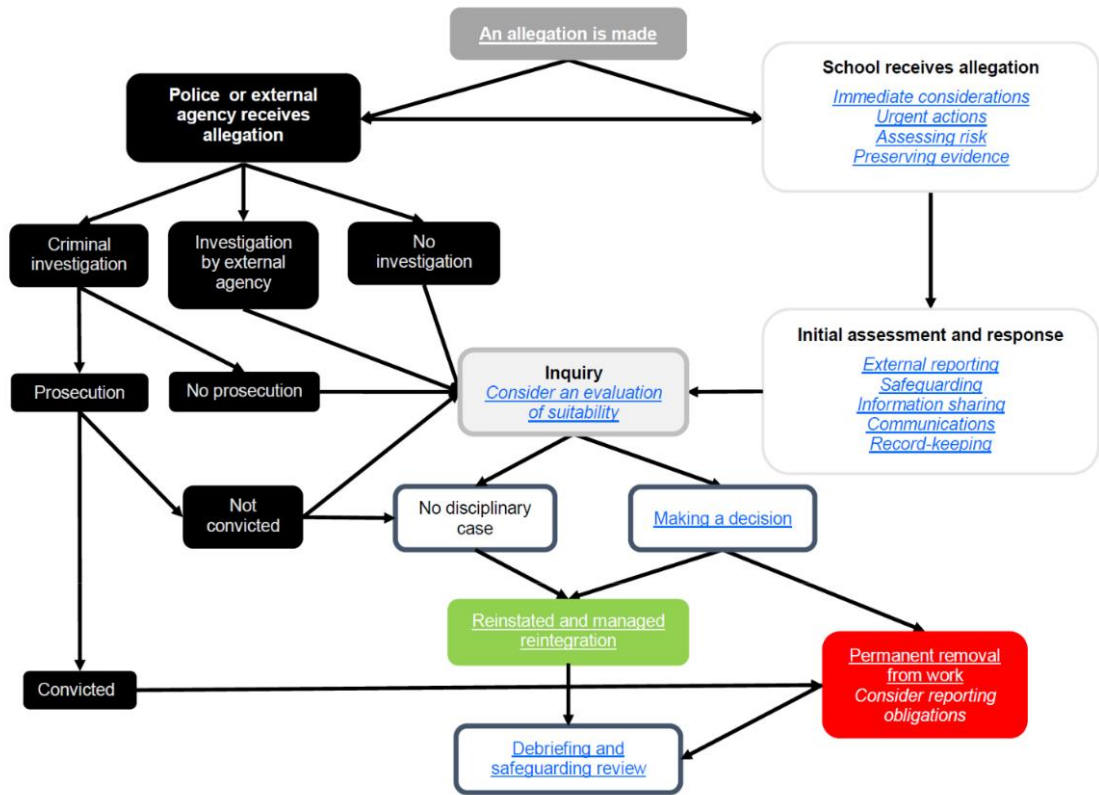
Dismissals and resignations

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.

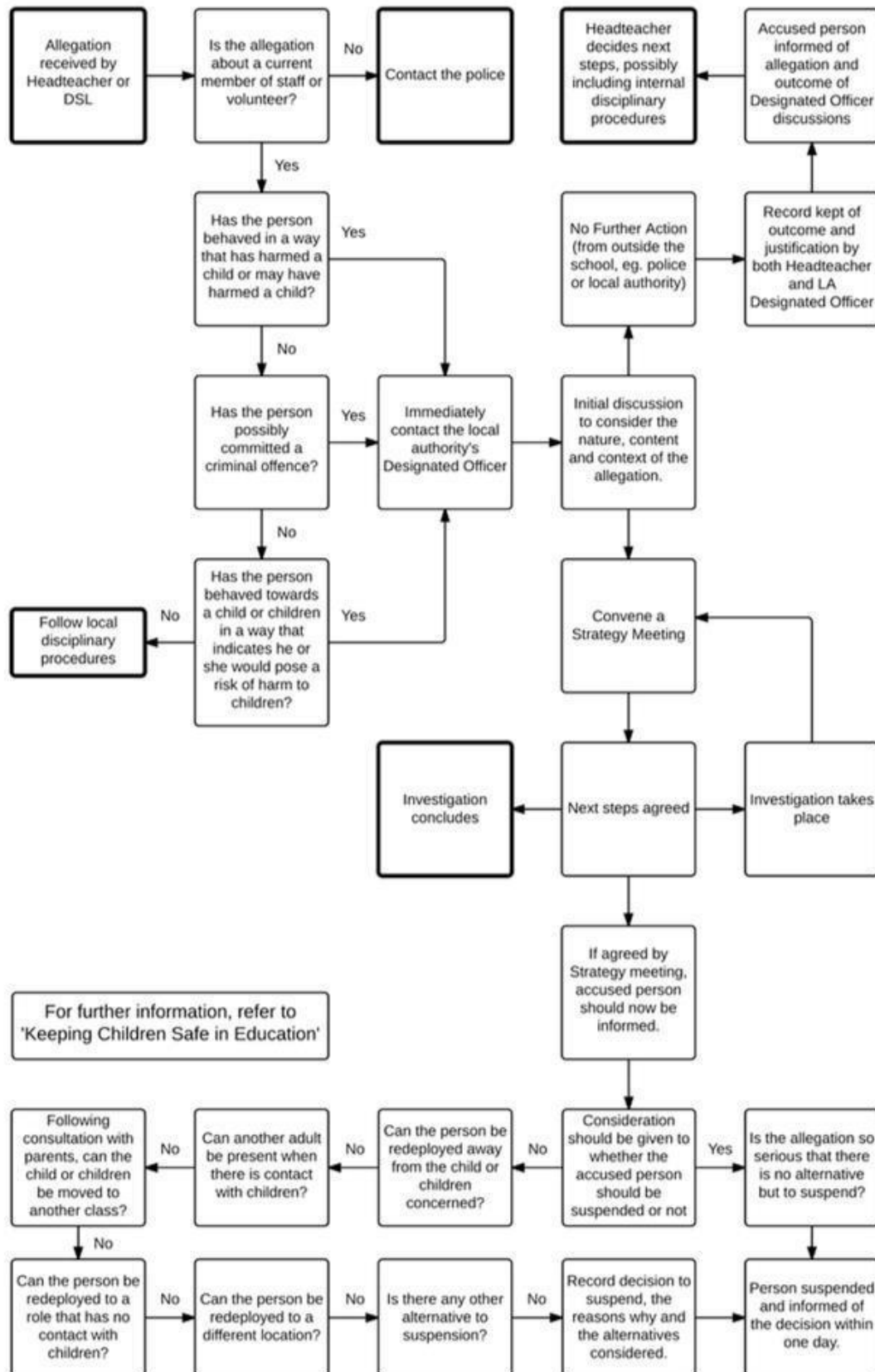
If a member of staff tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up in accordance with this policy and a referral will be made to the Disclosure and Barring Service, or equivalent, as soon as possible (within one month).

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
Substantiated	There is sufficient evidence to prove the allegation.	Discussion with HR and/or other professionals about referral to DBS and/or disciplinary hearing	There should be a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached. This should be kept in the confidential personnel file of the accused, and a copy provided to the person concerned.
False	There is sufficient evidence to disprove the allegation.	Where the allegation is found to be false, unsubstantiated or malicious, the information should not be included in any reference.	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.
Unsubstantiated	This is not the same as a false allegation. It means there is insufficient evidence to prove or disprove the allegation. This term therefore, does not imply guilt or innocence.		
Malicious	There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.		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 5

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.

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 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.

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.

APPENDIX 7

Safeguarding and School Trips

Keeping children safe is at the heart of everything we do, including the planning and running of extra-curricular trips, visits and events. There is a comprehensive package of due diligence, rigorous planning, and the assessment of risk before such activities take place that include a separate trip policy, emergency procedure planning, checklists around accommodation, finance and parental involvement, as well as a wide range of mandatory and specific risk assessments which are centrally held, and available to all. Staff who are responsible for various types of trips and given training at the start of the academic year, and are required to gain approval from senior leaders before planning can take place. All planning documents, budgetary considerations and contingencies, checklists, parental communication and risk assessments need to be completed by trip leaders and shared with and signed by all staff involved in the trip, after which final sign off is completed by the Heads of School and the Second Master or Master of the College. All policies and risk assessments are reviewed regularly to ensure that they are fit for purpose and modelled on best practice in the UK and internationally.

Additional Information:

- Educational Visits Policy 2023

APPENDIX 8

Safeguarding Referral/Concern Form

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

CONFIDENTIAL



WELLINGTON COLLEGE
CHINA
惠灵顿(中国)

Safeguarding Concern Form (SCF) 2023-24

Please use BLACK ink only

Please complete immediately and hand in person to one of the Safeguarding Team (Ed Bate / Rita Zhao / Yvette Peden / Melissa Meyers / Jan Bennett)

Date of concern:

Who are you?

Your Name:

Your telephone number:

Your Email:

Who are you concerned about?

Name (s):

House(s) / Year(s) / Gender(s) / Nationality(s):

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

Signature:

Date:

APPENDIX 9

Laws and Conventions Guiding the Child Protection Policy

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

The PRC Minors Protection Law, 17th October 2021

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

Article 3

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

Article 4

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

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

Article 6

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

Article 11

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

Protection by parents:

Article 17

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

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

Article 20

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

Article 21

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

Protection by School:

Article 39

Schools shall establish a student bullying prevention and control work system and provide education and training on the prevention and control of student bullying for faculty members and students. School shall immediately stop bullying behaviours of students and notify parents or other guardians of bullying and bullied minor students to participate in the identification and handling of bullying behaviours; provide psychological counseling, education and guidance for relevant minor students in a timely manner; and provide necessary family education and guidance for parents or other guardians of relevant minor students. For minor students who conduct bully, schools shall strengthen discipline in accordance with the law based on the nature and extent of the bullying behaviours. Schools shall not conceal serious bullying behaviors and shall report to the public security organs and the education

administrative departments in a timely manner and cooperate with the relevant departments on handling them in accordance with the law.

Article 40

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

Article 77

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

Article 87

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

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

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

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

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

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 10

MyConcern – How to add and update an entry

What should NOT go on MyConcern?

- Any low-level pastoral incident / concern – speak to HM / 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>. Alternatively you can click on the myconcern icon on the school homepage for staff [here](#).
- 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 ED BATEY – the DSL. He 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>. Alternatively you can click on the myconcern icon on the school homepage for staff [here](#).
- 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 (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



FILL IN THE PAGE

Report a Concern

Name(s) of Pupil(s)

Concern Summary

Send Concern to

Concern Date/Time

Details of Concern

Location of Incident

Action taken

Attachment

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 **ED BATEY**.

UPDATING A CONCERN FLOWCHART

CLICK ON 'MY CONCERNS'

myconcern ! Wellington College (8676001)

My Concerns Dashboards Profiles

Report a Concern My Concerns Resources

My Concerns

10 records per page

Concern ID	Concern Summary	Class	Categories	Reported At	Associated People	Owning Group	Status
2017: 8513	Megan came into college with a nasty bruise on her face		Injury Home Issues	16/1/17 11:10	Megan Davies Sophie Davies Benjamin Davies	DSLs	Open
2017: 8558	Alex came into school this morning with a bruised left eye		None	1/2/17	Alex Grazer	DSLs	Recorded
2016: 8202						Openshaw Campus	Closed

Concern Chronology

Click "Add Concern Update" when you have finished

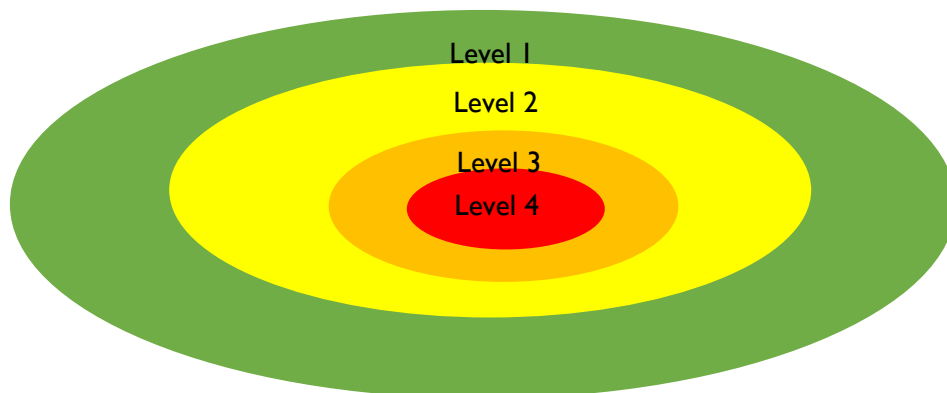
Show Filters (3) Add Concern Update Generate Filtered PDF

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
Low level Pastoral concern (1)	<p>This pupil may just need keeping an eye on to ensure that a low level concern does not develop into a larger issue.</p> <p>The team around the child (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>Examples may be initial concerns regarding:</p> <ul style="list-style-type: none"> Disordered eating or weight loss Low level mental health or behaviour changes Family circumstances SEN or academic issues Friendship / relationship issues Poor sleep 	<p>The support offered will be by internal College staff and professionals.</p> <p>The pupil should be offered support by relevant individuals. This might be:</p> <ul style="list-style-type: none"> HM / Class teacher Tutor Counsellor Pastoral & Safeguarding Lead Nurse SEN Lead <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>HM's 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>
Higher level Pastoral concern (2)	<p>This pupil will need a close eye keeping on them and is likely to need access to an additional service, usually provided by the College, but not exclusively so.</p> <p>They may be vulnerable individuals who are showing early signs of a failure to thrive and flourish, either in College or at home. Additional help is needed in order to enable them to fulfil their potential.</p> <p>This pupil will need close monitoring and there may be higher level concerns about:</p> <ul style="list-style-type: none"> Disordered eating or weight loss Mental health or behaviour changes Family circumstances (eg divorce) Significant bereavement Significant ill health within the family SEN or academic issues Friendship / relationship issues Bullying Sexual harassment Online safety / sexting Peer on peer abuse Attendance at College General social issues / social anxiety Gender issues 	<p>The support offered will usually be by internal College staff and professionals.</p> <p>The pupil should be offered support by relevant individuals. This might be:</p> <ul style="list-style-type: none"> HM / Class teachers Tutor Counsellor Pastoral and Safeguarding Lead Nurse SEN Lead DSL <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"> Psychologist SEN Support (eg an educational psychologist) An external therapist Education Welfare Service 	<p>The pupil will be discussed in detail at a DSLs weekly meetings. Staff will ensure that an appropriate team around the child is in place and that appropriate services are engaged. A full analysis if any risk factors and vulnerabilities will be considered.</p> <p>It is likely that parents will be aware that there are pastoral concerns.</p> <p>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>
Intensive support and monitoring (3)	<p>This pupil will require significant support due to complex and high-level pastoral concerns. Often several areas of professional support will be required. The pupil is likely to be dealing with multiple long-term issues and they need support from individuals to ensure that the impact of these significant issues are minimised as much as possible. Issues likely to be within this category of concern are:</p> <ul style="list-style-type: none"> Eating disorder, significant weight loss 	<p>The support offered will include both internal and external professionals and agencies. This may include:</p> <ul style="list-style-type: none"> Counselling External psychologist or Psychiatrist External therapists Pastoral and Safeguarding Lead, JS and Nest Safeguarding Leads and Heads of School Education welfare service 	<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</p>

Level	Needs of the pupil	Examples of support	Other comments
	<ul style="list-style-type: none"> Mental health – severe anxiety, depression, suicidal ideation Diagnosed mental health illness, such as OCD, Bipolar or Schizophrenia Repeated online safety concerns, sexting Repeated alcohol offences Concerns over illegal substances Significant bullying which is longer term Dangerous behaviour Serious physical illness / disability Gambling or gaming addiction Serious sexual harassment Peer on peer abuse Gender transition / reassignment Risky sexual behaviour Death of a parent / sibling 	<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>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>
Significant, serious and urgent Level of Need (4)	<p>This pupil is likely to be living in circumstances where they are suffering or are likely to suffer significant harm, where the young person themselves may pose a risk of serious harm to others or where there are complex needs in relation to disability and may require a more specialist intervention.</p> <p>The pupil may be accessing more specialised services such as residential care or hospitalisation.</p> <p>Issues likely to be in this category of concern are:</p> <ul style="list-style-type: none"> In-patient care for an eating or mental health issue Suicide attempt or suicidal ideation (requiring psychiatric evaluation) Psychiatric assessment for an acute mental health concern (such as psychosis) Abuse – physical, sexual, emotional, neglect Honour based violence: FGM, Forced Marriage Sexual violence or assault Radicalisation Absconding, no idea of whereabouts Homelessness <p>In this level of need, a referral will have been made to Children's Social</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"> Therapists / medical professionals within an inpatient setting Counselling College / external Psychiatrist External therapists DSL and Deputy Head (Pastoral) involvement Education welfare service <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 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 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>HM's 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 Safeguarding Governor will be informed.</p>

APPENDIX II

Training Framework

Position	Training	Frequency
DSL	Advanced	2 years
DDSL and School Leads	Advanced	2 years
Master	Advanced	3 years
School HR manager	Level I, and Advanced Safer Recruitment Training	3 years
Academic members of SLT	Advanced	Annually
All staff*	Level I	Annually
Volunteers etc.**	Introduction to safeguarding	Annually
Safeguarding governor	Advanced	2 years
WCC Safeguarding lead	Advanced	2 years

* Delivered by DSL

** Delivered by DSL and/or DSL Support

All staff's basic training includes but is not limited to:

- Understanding what child abuse is, and the difference between safeguarding and child protection.
- Clarity that safeguarding is everyone's responsibility and that being vigilant is crucial
- Recognising signs of abuse and the characteristics of neglect
- Knowing how to respond if they have a concern or if a child confides abuse to them
- Knowing how to share information and how to deal with allegations against staff in the organisation
- Consideration of different real-life scenarios to enable them to implement good and safe working practices
- Briefing on College Safeguarding Team, Code of Conduct and Safeguarding Policy

APPENDIX 12

Safeguarding Case Reporting Timeline Following 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 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:

1. Overview of the case and specific details of any allegations made
2. Recommendations of the WCC Safeguarding Lead
3. Details of interviews carried out as part of the investigation
4. Details of further steps which are planned as part of the investigation
5. 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.

ADDITIONAL INFORMATION

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

- The Code of Conduct 2023-24
- The Staff Handbook 2023-24
- The Anti-Bullying Policy
- The Guide to Boarding at Benson
- The Medical Policy and Guidance
- The Wellbeing Programme (KSI -4) - Positive Education Enhanced Curriculum (PEEC)
- Health and Safety Policy
- Whistleblowing Policy
- Intimate Care Policy
- Digital Safety Pack 2023-24
- Educational Visits Policy 2023
- Safeguarding guidance for Remote Learning 2023

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

1 Safeguarding Policy 2023-24

2 Staff Code of Conduct 2023-2024

3 Keeping Children Safe in Education 2023

You will find the above in the 'resources tab' – 'local policies'. If you need help, please contact Angel Li.

APPENDIX 13

Safeguarding contact details

Position	Name	Phone/Email
Designated safeguarding lead (DSL)	Ed Batey	edward.batey@wellingtoncollege.cn
Deputy DSL	Rita Zhao	rita.zhao@wellingtoncollege.cn
SLT Members responsible for safeguarding	SS: Yvette Peden JS: Melissa Meyers EY: Jan Bennett	yvette.peden@wellingtoncollege.cn melissa.meyers@wellingtoncollege.cn jan.bennett@wellingtoncollege.cn
Master	Yang Yang	yang.yang@wellingtoncollege.cn
Nominated safeguarding governor	Julian Jeffrey	julian.jeffrey@wellingtoncollege.cn

