This Code of Conduct is part of the DCI Framework which contains four Safeguarding documents:

1. The DCI Safeguarding Framework – an introduction
2. The College Safeguarding Policy
3. The DCI Child Protection Code of Conduct
4. The DCI Management of Safeguarding Concerns and Allegations about the Conduct of Staff Policy

Reporting documentation is available in each College
This policy should be applied in conjunction with the Dulwich College International Safeguarding Framework introduction, the Dulwich College International Safeguarding Code of Conduct and the DCI Management of Safeguarding Concerns and Allegations about the Conduct of Staff Policy.

This policy refers to all staff working for Dulwich College International and includes volunteers, interns, contractors, consultants, board members, guests and visitors. It is the responsibility of every staff member to become familiar with this Safeguarding Policy and to know whom to communicate with in case of any concern with regard to the protection of children in the College. In this policy the term “children” refers to any student in our care. Staff must also undertake the required Professional Learning in Safeguarding and follow all guidance on raising any concerns about the welfare or safety of any child at the College and making an allegation against another member of staff. Confidentiality is essential and the lines of communication must be followed. Professional Learning will include guidance on how to receive disclosure and record concerns.

The Safeguarding Policy outlines the following:

1. **PRINCIPLES**

2. **ROLES AND RESPONSIBILITIES**
   - 2.1 Head of College
   - 2.2 Safeguarding Lead
   - 2.3 Designated Senior Persons and Deputies
   - 2.4 Safeguarding Working Parties
   - 2.5 Professional Learning Directors
   - 2.6 Lead Safeguarding Trainers
   - 2.7 Safeguarding Trainers
   - 2.8 Board of Management/Board of Trustees

3. **MANAGING CONCERNS ABOUT CHILDREN**
   - 3.1 Reporting or recording concerns about a child or young person

4. **CONFIDENTIALITY**

5. **TRAINING STRATEGY**

6. **STAFF, VOLUNTEERS AND VISITORS**
   - 6.1 Safer Recruitment
   - 6.2 Volunteers
   - 6.3 Conduct of Staff
   - 6.4 Allegations against Members of Staff
   - 6.5 Whistleblowing

7. **DIGITAL SAFETY**

8. **THE AUDIT PROCESS**

9. **SAFEGUARDING POLICY LINKS**

1. **PRINCIPLES**

   We recognise that we have a duty to protect children from harm and respond to child abuse under the United Nations Convention of the Rights of the Child according to our values and Philosophy and Objectives statements.
We believe that every child, regardless of age, has at all times and in all situations a right to feel safe and protected from any situation or practice that may result in their being physically or emotionally affected. We agree that we have a primary responsibility for the care, welfare and safety of the children in our charge. In order to achieve this, all staff and volunteers in the College, in whatever capacity, will at all times be proactive in child welfare matters, especially where there is a possibility that a child may be at risk of harm.

We have adopted an open and accepting attitude towards children as part of our responsibility for pastoral care. We aim to create an environment where parents and children will feel free to talk about any concerns and will view our College as a safe place if there are any issues either in or out of College/School.

Children's and young people’s concerns are at the centre of this Safeguarding Policy and their views will be taken seriously if they seek help from a member of our staff. However, staff cannot guarantee confidentiality if concerns are such that a referral must be made to the appropriate agency or agencies in order to safeguard the child’s welfare. In our College, if we have concerns about a child’s physical, sexual or emotional well-being, or that they are being neglected, we will take appropriate action.

One of the aims of this policy is to raise awareness and reduce the potential for the following five types of abuse: Emotional, Social, Physical, Sexual and Neglect. These are detailed in the introduction to DCI Safeguarding Framework (document 1).

As part of our Safeguarding Professional Learning Framework all staff will receive appropriate Professional Learning in these areas.

In our College we will:

- Ensure that staff and volunteers are an integral part of the child safeguarding process.
- Ensure that safeguarding children is the responsibility of all staff, volunteers and visitors to our College.
- Recognise that Safeguarding children is the responsibility of Dulwich College Shanghai Minhang and all staff, as well as volunteers and parents.
- Ensure that all staff, volunteers and parents know how to report concerns or suspicions.
- Appoint a senior member of staff as the Designated Senior Person (DSP) with the knowledge and skills to recognise and act on child protection concerns. He or she will act as a source of expertise and advice, and is responsible for leading action within the College with regard to child protection issues.
- Ensure (through the DSP) that staff members with designated responsibility for child protection receive appropriate training.
- Share our concerns with others who need to know and assist in any referral process.
- Ensure that if staff or volunteers believe that a child may be at risk of suffering harm, they will always refer such concerns to the DSP, who will follow the accepted procedure.
- Safeguard the welfare of children while in the College. This is done through positive measures to address bullying, which may be caused by sexual factors, racial factors, disability or special educational needs.
- Ensure that all staff are aware of the child protection procedures established by DCI and, where applicable, other agencies, and act on any guidance or advice given by them.
- Ensure, through our recruitment and selection of volunteers and paid employees that all people who work in the College are suitable to work with children.

2. ROLES AND RESPONSIBILITIES

2.1 Head of College

The Head of College will ensure the implementation of the Dulwich College International Safeguarding Framework and agreed College action plan through this policy.

The Head of College will also:

- Take part in any Safeguarding Professional Learning for Head of Colleges and Directors.
• Create a Safeguarding working party in the College.
• Appoint a Designated Senior Person(s)/Deputy Designated Senior Person(s) for Safeguarding for the College and ensure all staff are aware of their name(s) and role.
• Implement a clear framework of communication for reporting and information sharing for child protection. Ensure that all staff understands that sharing information is the key to providing effective early help where there are emerging problems.
• Ensure that assessments of all Safeguarding situations are child-centred, that information is shared and that decisions are made in the child’s best interests, rooted in child development and informed by evidence.
• Ensure that Safeguarding is an ongoing part of the development and action planning of the College.
• Disseminate Safeguarding awareness amongst staff, parents, visitors and students of the College.
• Ensure key Safeguarding staff are replaced and receive appropriate Professional Learning to ensure that they can carry out their roles.
• Ensure that every employee of the College has appropriate safety checks and references.
• Ensure that the annual DCI Safeguarding audit is complied with and acted upon.
• Be the first line of communication in any allegation against an adult in the College unless the allegation is against the Head of College.

The Dulwich College name of College Head of College is: name

2.2 College Safeguarding Lead
The Safeguarding Lead is responsible for:

• Ensuring that the Lead Trainer is working with HR to plan, implement and record Professional Learning for everyone in the College, including new staff.
• Ensuring that communications are clear on how the reporting is done (e.g., putting posters around the College.
• Chairing the Safeguarding Committee and making sure all areas of responsibility for Safeguarding are covered by the group.
• Appointing new DSPs and new trainers when there is a vacancy.
• Reporting at least once per term to the College Leadership Team, Board of Trustees and Board of Management.
• Liaising with trainers and overseeing any new developments in training requirements.
• Overseeing all documentation related to Safeguarding.
• Ensuring that this policy is updated and reviewed annually, to ensure that it is consistent with any changes to the DCI Framework and that all individual names are up to date.
• Ensuring parents are aware of the Safeguarding Framework and Policy in order to alert them that the College may need to make referrals. Raising parents’ awareness may avoid later conflict if the College does have to take appropriate action to Safeguard a child.

The Dulwich College name Safeguarding Lead is: Name

2.3 Designated and Deputy Senior Person(s) for Child Protection
Each DSP will be a senior member of staff who has the capacity to develop the role to lead any and all child protection issues, to audit child protection records on an annual basis and to be a member of the College Safeguarding Working Party. DSPs should have the authority and be accessible to teachers and other staff in their College and lead child protection concerns if called upon to do so, keeping the appropriate people informed. Each DSP will have a nominated Deputy DSP who will take on the role during any absence of the DSP. Allegations against an adult in the College will be referred to the Head of College, the Director of Schools or the Regional Director of Schools for the China region if the allegation involves the Head of College.
The DSP will also act as the resource available for other staff, volunteers and members of the Board of Management and/or Board of Trustees to draw upon. The DSP is key to ensuring that proper procedures and policies are in place and are followed with regard to child Safeguarding issues.

The College recognises that:

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

To be effective, the Designated Senior Persons will:

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

The DSPs also have an important role in ensuring that all staff and volunteers receive appropriate Professional Learning. All staff and volunteers should:

- Attend training in how to identify abuse and know when it is appropriate to refer a case.
- Attend refresher and any relevant courses and then ensure that any new or key messages are passed to other staff, volunteers and Board members.
- Make themselves (and any deputies) known to all staff, volunteers and Board of Management members (including new starters and supply teachers) and ensure those members of staff have had training in child protection. This should be relevant to their needs to enable them to identify and report any concerns to the DSPs immediately.

Each DSP should:

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

Each Designated Senior Person is identified below. In the Designated Person’s absence the Deputy DSP will deal with any concerns raised.

Designated Senior Person:  
Deputy Designated Senior Person:  
Designated Senior Person Chinese/Korean:  
Deputy Senior Person Chinese/Korean:

2.4 Safeguarding Working Parties
The College will have a Safeguarding Working Party made up of volunteers from each area of the College, including the Safeguarding Lead, the DSP(s) and the Lead Trainer. The chair of this working party will report directly to the Head of College. The role of the group is to monitor the implementation of the action plan and ensure that all recommendations in the annual audit are acted upon as agreed. The chair of this group will be a member of the DCI Cross-College Safeguarding Working Party. This group will meet at least once a year.

2.5 Professional Learning (PL) Leaders
The PL Leaders will work closely with Lead Trainers and colleagues across DCI schools to create and maintain an effective ongoing Professional Learning programme and ensure that the DCI child-centred training Safeguarding Strategy (below) is followed. The DCI Safeguarding PL Strategy can be found in Section 5 of this document and forms an integral part of this policy.

The Dulwich [name of school] Professional Learning Leader is name of Professional Learning Leader

2.6 Lead Safeguarding Trainers
Dulwich International Colleges Lead Safeguarding Trainers will:

• Follow the DCI Safeguarding Framework.
• Ensure that PL is delivered by recognised Dulwich Safeguarding Trainers.
• Ensure that DCI approved materials are used.
• Attend PL annually with other Lead Safeguarding trainers across the DCI schools.
• Ensure they keep up to date with changing policy and disseminate changes to other trainers in their College.
• Assure the quality of training through observation and PL.

The Dulwich College Name Safeguarding Lead Trainers are: Names of Lead Trainers

2.7 DCI Safeguarding Trainers
DCI Safeguarding Trainers will:

• Deliver approved Professional Learning as agreed.
• Deliver Professional Learning in pairs or groups where possible and appropriate.
• Attend meetings and Professional Learning as required.

2.8 Board of Management
The Head of College is expected to include Safeguarding in every Board report and highlight progress on the College Improvement Plan. As a matter of confidentiality student and adult names in relation to Safeguarding incidents will not be identified at Board meetings.

Both the Board of Management shall appoint a Key Safeguarding Person.

The Dulwich College Name of college Board of Management Key Safeguarding Person is: Add name

3. Managing concerns about children
Upon the receipt of any information from a child, or where a child makes a direct allegation or discloses that s/he has been abused, the campus Designated Senior Person must be informed. The DSP will then take the concern to the Head of College.

If anyone observes injuries that appear to be non-accidental, or if any person has suspicions that a child may be at risk of harm, the campus DSP must be informed. The DSP will then take the concern to the Head of College. In his/her absence concerns will be taken directly to Kate Beith, the DCI Designated Senior Person.

Where a child makes an allegation against a member of staff, his/her concerns must be recorded immediately, including what s/he has seen, heard or known at the time the event occurs. The DSP will inform the Head of College immediately. In the absence of the Head of College, the DSP will inform the Director of Schools /Regional Director of Colleges for China, depending upon the region. In the case of an allegation against the Head of College, the Director of Schools will be informed directly.

The College will ensure that all members of staff and employees are familiar with the procedures for keeping a confidential written record of any incidents and with the requirements of DCI.

Members of staff and volunteers are not required to investigate suspicions; staff or volunteers who believe that a child may be at risk will immediately refer concerns to their DSP.

Staff or children must be encouraged to report any concerns about peer on peer abuse, relating to activities either online or in person.

Heads of College must ensure that regular learning opportunities are created to minimise peer on peer abuse. They must also ensure that children know how to recognise unacceptable behaviour from adults or peers and feel confident to report any concerns they may have. Victims will be supported through the College pastoral system.
3.1 Reporting or recording concerns about a child(ren)
Staff must report concerns immediately, maintaining confidentiality and reporting immediately to their DSP or Deputy DSP in their absence. They will be asked to record their concerns on the Confidential Record of Concern form (available from the College DSP).

The DSP will also record and manage any such concerns about peer on peer abuse. Such concerns will always be taken seriously and acted upon, under the appropriate policy e.g. safeguarding, bullying, not dismissed as ‘banter’ or ‘part of growing up’.

It is the responsibility of the DSP to take the next steps in the process. All documentation will be stored in a safe place. Staff must feel confident that they will be supported if they report any concerns about a child. Staff will be expected to ensure that any reports written about any safeguarding situation are child-centred, in the child’s best interests, rooted in child development and informed by evidence. Staff may be asked to use the Risk Assessment Tool (to be supplied by the DSP).

The DSP may gather a response team to assess a reported child protection issue. The make-up of the team will depend upon the nature of the situation. The team will take a holistic approach, addressing the child’s needs within their family, the wider community and the international context. 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 should be recorded along with the impact of any change on the welfare of the child.

4. CONFIDENTIALITY
The College and all members of its staff will ensure that all data relating to children is confidentially managed in accordance with the requirements of DCI and applicable national or local guidance, laws or regulations.

Those reporting any safeguarding concerns will adhere to the lines of communication, ensuring confidentiality. The DSP will support the process outlined in this document, and the College will give detailed information about lines of communication in the induction process and at the beginning of every academic year.

Any member of staff who has access to sensitive information about a child and/or the child’s family must take all reasonable steps to ensure that no disclosure is made under any circumstances, save with the express approval of the Designated Senior Person or Head of College.

Regardless of the duty of confidentiality, any member of staff who has reason to believe that a child may be suffering harm, or be at risk of harm, has a duty is to forward this information without delay, consistent with the Safeguarding Policy, to the designated line manager for child protection. Volunteers and visitors are not authorised to take any action; their roles are strictly limited to reporting if they are concerned or have witnessed any concerning behaviour while in the College.

5. SAFEGUARDING PROFESSIONAL LEARNING STRATEGY
All staff working in any capacity or in association with the College will receive Professional Learning on Safeguarding Children, to be undertaken as soon as possible after taking up their position. This training will be called ‘induction’. All staff will be assigned to a particular staff category that then places them on a particular pathway for Professional Learning on Safeguarding.

In-house trainers at the College will be supported by one or more lead trainers. Staff completion of the various levels of Professional Learning will be recorded and tracked centrally by the Professional Learning Leader, with the support of department heads across the College. All staff Professional Learning will be refreshed every two years.

New trainers will be identified annually if necessary, and a ‘train the trainer’ day will happen in the third term of each academic year or according to the needs of each College.
Updates from the UK and other countries will be an important part of ongoing Professional Learning, and we will look to experts from the UK for support. This may take the form of future visits or Skype/video conferencing. Lead trainers will link with other lead trainers across DCI schools.

The Designated Person(s) will receive external Professional Learning every two years.

5.1 Staff Categories for Professional Learning

- Head of Colleges and Directors - training to be organised by DCI.
- Lead Teaching Staff (all teachers, middle managers, senior managers) - monitored by Head of College.
- Teaching Assistants/Learning Assistants (classroom-based in DUCKS and Junior School, department-based in Senior School) – monitored by Head of College.
- Business Administration (HR, Finance, Operations) – monitored by HR Director
- External Relations (Admissions, Marketing – monitored by Head of AMC).
- DCP (managers and staff who lead the individual programmes) – monitored by DCP Manager.
- Supply teachers (those who work with us on a regular basis) – monitored by staff member in charge of cover [insert name].
- Cleaners/helpers/ guards/catering staff/bus monitors – monitored by Head of Business Administration or designate as appropriate).
- Other adults with supporting roles (including volunteers) – monitored by relevant Head of Department.

5.2 Monitoring of Training

The content for each course is to be determined and planned by in-house trainers in consultation with the DCI Lead Trainer and the Safeguarding Working Party. All trainers will plan collaboratively and therefore will be able to work with the Professional Learning Leader and the HR Department.

Each College will have:

- two Lead Trainers (one English speaker and one local speaker)
- English Language Trainers (Teaching Staff)
- Local Language Trainers (Teaching Staff)
- English Language Trainers (Admin/Support staff)
- Local Language Trainers (Admin/Support staff)

5.3 Trainer’s responsibilities

The Lead Trainer(s) will:

- Facilitate trainers’ meetings and support within the group.
- Attend all training events with other Dulwich Colleges.
- Provide quality assurance for Professional Learning.
- Monitor training updates for trainers (with the Professional Learning Leader).
- Support the process of identifying new trainers.

5.4 Resources management

All training materials will be stored on the College shared drive in the Safeguarding area and the DCI Professional Learning Platform. Hard copies of training materials and training resources will be managed by the PL Leader. Amendments can only be made after discussion with the DCI Trainer.
5.5 Training new trainers
The identification of potential new trainers will happen once leaving trainers have been identified each year. New trainers will be trained in Term 3 by the DCI Trainer.

5.6 Induction and Professional Learning
All new members of staff will receive an induction to Safeguarding, which will give an overview of the Framework and Policy and ensure staff understand its purpose, values, services and structure, as well as confidentiality issues and how to identify and report abuse. All new staff at the College (including regular volunteers) will receive basic Child Protection information and contact information with regard to reporting concerns. During induction staff will receive a copy of the College Safeguarding Policy and the DCI Safeguarding Framework.

All staff will be expected to attend Safeguarding Professional Learning that will enable them to fulfill their child protection responsibilities. The College/School will provide this training as organised by the Professional Learning Leader.

6. STAFF AND VOLUNTEERS

6.1 Safer recruitment
To ensure that children are protected while at the College, we will carefully select, screen, train and supervise our staff and volunteers. The College/School will follow the DCI Recruitment Policy.

We accept that it is our responsibility to:

- Follow up at least one reference with a telephone call or personal contact, during which we will discuss the applicant’s suitability to work with children, before the employment contract is signed.
- Ensure that, before starting work, all adults with access to children at the College have been checked by the Disclosure and Barring Service (DBS), or the equivalent service or bureau in the country where the teacher has been employed.

In addition, before a person takes up a position in the College we will:

- Ensure that the candidate’s identity has been checked to establish that information given by the candidate is accurate.
- Verify that the candidate’s qualifications are genuine.
- Obtain professional and character references before the employment contract is signed.
- Ensure that the candidate’s health and physical capability are suitable to the position.
- Examine previous employment history and seek extra evidence to cover any gaps or lack of available police checks.

More details of the safer recruitment strategies we follow can be found in the DCI Recruitment Policy.

6.2 Volunteers and visitors
We recognise that some people who may be unsuitable for working with children may use volunteering as an opportunity to gain access to children. For this reason, all regular volunteers in the College, in any capacity, will be treated the same as contracted staff with respect to criminal record and identity checks. All regular volunteers will also receive the relevant level of safeguarding training.

Parents or other volunteers who help on an occasional basis must work under the direct supervision of a member of staff, and may at no time have unsupervised contact with children. They must also sign the Volunteer Safeguarding Statement.
The College shall maintain a Safeguarding Guide for all visitors. All visitors who come on campus will be asked to read the Safeguarding statement before being issued a visitor’s pass.

6.3 Professional and personal conduct of staff
The College has a duty to ensure that professional behaviour applies to relationships between staff and children, and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. All staff will sign the DCI Child Protection Code of Conduct (document 3).

At all times, members of staff are required to work in a professional way with children. Staff will receive two levels of Safeguarding training during their induction period and their first year at the College. From their first day of employment all staff should be aware of the safe practice needed to work with children.

All staff and volunteers should avoid being alone in a private place with a student, on or off campus (including their home). If the teacher is alone in a room or any other place on campus, where possible the door to the relevant room should be left ajar and both teacher and student should be visible to the outside corridor. If the door has to be closed (individual music lessons for example) both teacher and student should be visible to the outside corridor and another colleague should be aware and in close proximity. If the meeting is not part of a normal lesson during the school week (extra homework supervision or tuition for example), one or more other colleagues should be informed and be in close proximity. No member of staff should meet children outside school hours or school duties unless (i) agreed by their line manager and the teacher is accompanied by a colleague or (ii) the child is accompanied by at least one parent or responsible adult such as a guardian.

Physical Interventions. Members of staff may have to make physical interventions with children. Members of staff should only do this where:

- It is necessary to protect the child, or another person, from immediate danger; or
- The member of staff has received suitable training.

All staff should refrain from:

- Cultural and gender stereotyping
- Disclosing personal details inappropriately
- Engaging in inappropriate conversation through social networks, email or face to face conversation
- Becoming a friend or follower of any child on any form of social media.

6.4 Allegations against a member of staff, volunteer or board member
If anyone makes an allegation that a member of staff, a volunteer or a Board member has put a child or young person at risk and acted inappropriately, this will be handled by the Head of College unless the allegation is against the Head of College, in which case the DCI Regional Director of Schools for China will investigate and handle the matter, keeping the DCI Director of Schools and the DCI Chief Executive informed. The DCI designated officer will gather information about the allegation, and report this without delay to the DCI Chief Executive.

When an allegation is made by one staff member against another, the DCI procedure for managing allegations will be followed as outlined in the DCI Management of Safeguarding Concerns and Allegations about the Conduct of Staff Policy.

The people involved in any allegation process will be clearly guided. All staff should also be aware of the DCI Whistleblowing guidance, which supports staff members who may have concerns about a colleague, line manager or a member of their senior management team.

In the allegation process there will be a commitment to:

- The Disciplinary rules as outlined in the Staff Handbook, though in case of any conflict between this policy and the rules in the Staff Handbook, this policy shall prevail.
- Resolving the situation as soon as possible.
Maintaining confidentiality.

If any child raises a concern about another child or member of staff, the concerns will be managed confidentially, with sensitivity and support.

6.5 Safeguarding whistleblowing guidance

The rationale

Our whistleblowing system provides staff with an avenue to raise awareness and concern if they feel that a colleague or manager is engaged in conduct that is causing a negative effect upon the welfare and safety of any children in one of our schools. This could also refer to a situation where a staff member considers that behaviour by another member of staff is not being addressed by the management of the College and provides a clear way to raise awareness of a concern directly to DCI.

This guidance is written for all adults working with children in our school. Each staff member must acknowledge their individual responsibility to bring matters of concern to the attention of the senior management in the College or where appropriate, to the Director of Schools at DCI. Although this can be a difficult situation it is particularly important where the welfare of children is concerned.

A staff member may recognise that something is wrong but may not feel able to express concerns because of loyalty to colleagues or a fear of harassment or victimisation. We encourage all adults to ensure that children are their priority and should not be unnecessarily at risk.

Reasons for whistle blowing

- Every individual has a responsibility to raise concerns about unacceptable practice or behaviour in relation to the safety and welfare of our children.
- To prevent a problem from becoming more serious.
- To protect or reduce risks to other children in the College.

What stops people from whistleblowing

- Fear of initiating a situation that can result in a significant investigation.
- Negative effect upon workplace relationships.
- Fear of being wrong.
- Fear of repercussions.
- Fear of not being believed.

How to raise a concern

- Concerns should be expressed as soon as possible. The earlier a concern is expressed the sooner action can be taken.
- The concern should express exactly what practice is causing concern and why.
- The person raising a concern should approach the Head of College immediately and in his absence, the DCI Regional Director of Schools China, John Todd.

If a concern is expressed about the person’s immediate manager or the Head of College, it can be referred to the DCI Regional Director of Schools China (Brian McDouall) or the DCI Director of HR (Christine Mawal), who will consult with Ex-Com and the DCI Designated Senior Person as necessary. A member of staff expressing a concern is expected to be acting in good faith and explain the reasons for the concern. However, it is not expected that the staff member will always have hard evidence or be certain that his or her concerns are well grounded.

The next steps

- The staff member specified in any whistle blowing procedure should be given information about the nature and progress of any enquiries.
- The employer has a responsibility to protect the staff member from any harassment or victimisation.
including, where appropriate, keeping the whistle blowing staff member’s identity confidential.

- No action will be taken against the whistle blower if the concern proves to be unfounded and was raised in good faith.

Self-reporting
Occasionally a member of staff may have a personal difficulty that they know is impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so that professional and personal support can be offered. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children in the College.

Further advice and support
It is recognised that whistle blowing can be difficult and stressful. Advice and support will be made available to the member of staff concerned and will be organised by the HR department.

7. DIGITAL SAFETY
E-safety is an integral part of the curriculum. The use of ICT equipment and systems are well monitored and appropriate actions are taken where issues are identified. We are committed to ensuring that our College is a safe digital learning community through the curriculum, professional development, auditing of systems, working with parents and developing detailed e-policies. The College has an E-Safety policy.

Children are encouraged to use the internet at all times in a safe way. Parents are asked to give permission for their children to use the internet on entry to the College. Parents, pupils and staff must sign an Acceptable Use form to ensure that they understand the risks and sanctions relating to misuse of systems in and beyond the College. Staff who know of misuse by a teacher, staff member, volunteer or child must report it to the Head of College without delay. The Head of College has overall responsibility for internet safety and will have access to all email addresses and passwords.

The College will ensure that:

- Software is in place to safely manage access and identify any person accessing inappropriate sites or information.
- Students are encouraged to discuss openly their use of technology and anything that makes them feel uncomfortable. If this results in child protection concerns, the Senior Designated Person for child protection should be informed immediately.
- Students are encouraged not to give out their personal details, phone numbers, school or home addresses, or passwords.
- Students adhere to the school policy on mobile phones.
- Training is provided to pupils, staff and volunteers on e-safety matters where necessary.
- All IT equipment in the College has suitable software to maximise the online protection of children.

Staff and children are expected to engage in the safe and responsible use of social media. However, any member of staff who has or is alerted to any child protection concerns related to the use of the internet or social media should follow the lines of communication set out in this policy.

The College acknowledges that parents like to take photos and videos of their children in performances, sports events and other presentations. This is a normal part of family life, and we will not discourage parents from celebrating their children’s successes. However, if this raises Health and Safety issues (e.g., the use of a flash could distract a child and cause an accident) we will take appropriate steps (e.g., we will inform parents that flash photography is not permitted).

If parents indicate to the College that they would not like their child’s photograph or video to appear in the College’s materials, brochures, websites, advertisements or press releases, we will ensure that the parents’
wishes are fulfilled. The College cannot, however, be held accountable for any photos or videos taken by parents or members of the public at school functions.

8. THE AUDIT PROCESS
The action plan resulting from the audit will be agreed and signed by the following persons:

- The DCI auditors
- College Safeguarding Lead
- The Head of College
- The Director of Schools / Regional Director of Schools for China.

The Safeguarding Working Party, chaired by the Safeguarding Lead, will review the action plan at three meetings per year. The Safeguarding Lead will discuss the action plan with the Head of College at their termly safeguarding meetings, and Head of College will report progress to the Boards at each meeting of the Board of Management.

9. SAFEGUARDING – POLICY LINKS

The following essential and relevant policy documents can all be accessed by selecting the hyperlinks.

- Safer Recruitment Policy
- Anti-bullying Policy
- Health and Safety Policy
- Behaviour Management Policy
- Fire Safety Policy
- Lockdown Policy and other emergency procedures
- First Aid Policy (medical procedures)
- Educational Visits Policy (to include risk assessments)
- Supervision of Students Policy
- Procedures for recording sanctions on students
- Procedures for maintaining admissions and attendance registers
- E-safety Policy
- CCTV Surveillance Policy