

DEHONG XI'AN STUDENT SAFE AT SCHOOL POLICY

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1. AN INTRODUCTION

For staff working with Dehong Schools, the *Safe at School* policies and procedures can be found in an accessible format in ConnectED.

1.1 Our *Safe at School* statement

At Dehong Education we define *Safe at School* as taking action to protect students in every aspect of their moral, emotional, intellectual, physical development and welfare. Their protection is at the heart of everything we do.

1.2 Our guiding principles

- We listen to our students and put them first
- We believe that everyone is responsible for a Safe at School
- We train all adults working in our schools
- We support the needs of individual students, recognising that some are more vulnerable than others
- We deliver a Safe at School curriculum.
- We recruit safely
- We have a culture of safe reporting

1.3 Our 8 *Safe at School* competencies

1. Placing the student at the centre of all that you do.
2. Understanding the possible signs and indicators of abuse and neglect.
3. Knowing how to respond to and communicate with students.
4. Always responding to safeguarding needs.
5. Understanding what might make some students more vulnerable.
6. Understanding your *Safe at School* policy and Code of Conduct.
7. Knowing how to share key information safely and who to share it with.
8. Being culturally sensitive.

2. PROFESSIONAL LEARNING

As a member of the Dehong *Safe at School* community the learning for staff will be ongoing. After *Ten Things You Need to Know* and face to face induction staff will receive regular knowledge check activities. More can be read in the Dehong Competency and Professional Learning Framework.

3. POLICIES AND PROCEDURES

3.1 What is our context?

Dehong International provides a bilingual, bicultural education to Chinese nationals. Our approach to protecting students is rooted in the laws of the People's Republic of China and upon best practice from around the world.

3.1.1 The Law of the People's Republic of China on the Protection of Minors 2020 states that our protection of students must be based on the following principles of:

1. respecting the personality and dignity of minors
2. understanding stages of a student's development and meeting their developmental needs
3. combining education and protection.

<https://www.loc.gov/law/help/child-rights/china.php>

3.1.2 United Nations Convention on The Rights of The Child

In 1989 The People's Republic of China signed the [United Nations Convention on The Rights of The Child](#) to which 196 countries around the world are signatories. The Convention gives all children the right to develop, to be protected and to participate.

<https://www.hrichina.org/en/convention-rights-child-crc>

<https://www.unicef.cn/en>

3.2 What is child abuse?

Child abuse:

- *is when a student is intentionally harmed by an adult in an isolated incident or over a period*
- *can be physical, sexual or emotional and can happen in person or online*
- *can be a lack of love, care and attention – this is neglect*
- *when a student witnesses abuse and its effects*

- *when a student is exploited; an individual or group takes power to coerce, manipulate or deceive a student on or offline.*

Our Dehong Schools ensure that Dehong staff, visitors and volunteers know the signs and symptoms of abuse, listen to us and are aware that abuse and neglect are rarely standalone events that are covered by one definition or label. In most cases, multiple issues will overlap with one another.

An essential part of keeping students safe is Child Protection. The school has a range of policies and procedures to protect our students.

Peer on peer abuse:

Peer-on-peer abuse is any form of physical, sexual, emotional, and financial abuse, and coercive control exercised between students, and within student's relationships (both intimate and non-intimate), friendships, and wider peer associations.

Protecting vulnerable students

All students, regardless of age, disability, gender reassignment, race, religion or belief, gender, or sexual orientation have an equal right to be protected from all types of harm or abuse. Extra safeguards may be needed to keep students who are additionally vulnerable safe from abuse. Examples could be students who are minoritised from ethnic communities; those with special educational needs and disabilities (SEND) or are lesbian, gay, bisexual or transgender, queer or questioning (LGBTQ).

Some students will be additionally vulnerable because of the impact of previous experiences, their level of dependency, communication need or other issues. Vulnerable students may have experienced adverse childhood experiences where the capability of the family or wider community has not always met their needs, or indeed has caused harm. Such experiences might include the presence of adults in the home with mental health problems, alcohol and drug dependence or domestic abuse; absence of supportive relationships; the wider community and social conditions. (Peer-on-Peer Abuse Policy Doc 11)

3.2.1 Four Dehong Education indicators of abuse

In our child protection work we recognise four different potential areas of abuse:

- Neglect (including affluent neglect)
- Physical abuse
- Emotional abuse
- Sexual abuse.

3.2.2 High risk factors

- Families with complex needs
- Parental substance abuse
- Poor mental health
- Parents with learning difficulties
- Students with disabilities
- Families with past history of child abuse
- Domestic violence

Staff will receive further information about domestic abuse in their training.

3.3 How do we keep our students safe at school?

3.3.1 Overview of key responsibilities

We make sure that all aspects of keeping students safe at school are implemented by assigning a range of key roles and responsibilities for which people receive specific training and support.

3.3.1.1 The Dehong Safe at School responsibilities

Lesley Meyer Lesley.Meyer@eimglobal.com

Lesley is the EiM Chief Education Officer who is responsible for advising the Dehong schools and is the Designated Safe at School Lead for Dehong.

Lesley is responsible for the implementation of the Dehong *Safe at School* approach across the schools and is the first in line of communication from the School Principals if there is an escalated concern.

She will ensure that each school is externally or internally audited annually and that subsequent action plans are monitored.

Lesley is responsible for keeping the EiM Chairman informed of any *Safe at School* or child protection issues.

3.3.1.2 Dehong Safe at School Consultants

Kate Beith Kate.Beith@dehong.cn

Kate is responsible for developing the *Safe at School* training for Dehong Schools and central office at all levels. She also leads in the development of the Chinese *Keeping Myself Safe* programme for students, parents and staff. Kate works closely with the

Dehong central marketing team. She acts as an advisor when required to support any escalated child protection issues.

Tim Gerrish OBE

Tim is responsible for externally auditing the Dehong schools biannually. With Kate Beith, he provides advanced training for Safe at School Leads and acts as an advisor when required to support any escalated child protection issues.

3.3.1.3 Key *Safe at School* Responsibilities in our Dehong Schools

Each School will make sure that all aspects of keeping students safe at school are implemented by assigning a range of key roles and responsibilities for which people receive specific training and support.

The Principals

Lily Liu (DEXA Principal) Lily.Liu@dehong.cn

Each Principal will implement the Dehong *Safe at School Policy* and agree to the school action plan. They will ensure that the *Safe at School* policy, with any adaptations to their context, will be in place in their School.

Each Principal will also:

- Take part in any *Safe at School professional* learning for Principals.
- Create a school *Safe at School working* party in his/her school.
- Appoint a Designated *Safe at School* Person(s) / Deputy Designated Senior Person(s) for the school and ensure all staff are aware of their name(s) and role.
- Implement a clear policy of communication for reporting and information sharing for child protection. Ensure that all staff understand that the sharing of information is the key to providing effective early help where there are emerging problems.
- Ensure assessments of any child protection situation are child-centred, that information is shared, and decisions are made in the child's best interests, rooted in child development and informed by evidence.
- Ensure that *Safe at School* is an ongoing part of the development and action planning of their schools.
- Disseminate *Safe at School* awareness amongst staff, parents, visitors and students at the school.

- Ensure key *Safe at School* staff are replaced and receive appropriate PL to ensure that they can carry out his/her role.
- Ensure that every employee of their school has appropriate safety checks and references.
- Ensure that the annual *Safe at School* audit is complied with and acted upon.
- Be the first line of communication in any allegation against an adult in their School unless the allegation is against the Principal.
- Use the Compliance Checklist as an ongoing way of tracking the status of all Schools *Safe at School* developments and meetings in a monthly meeting with the *Safe at School* Lead

School Designated Safe at School Leads

David Chivers David.Chivers@dehong.cn

Each SASL is responsible for:

- Ensuring that the Lead Trainer is training everyone in the school, including new staff.
- Ensuring that communications are clear on how the reporting is done (e.g. putting posters around the school).
- Chairing the *Safe at School* committee and making sure that CPLs attend.
- Appointing new CPLs and new trainers when there is a vacancy.
- Reporting at least once per term to the School Leadership Team and Board of Management.
- Liaising with trainers and overseeing any new developments in training requirements.
- Overseeing all documentation related to *Safe at School*.
- Ensuring that this policy is updated and reviewed annually.
- Ensuring parents are aware of the *Safe at School* in order to alert them to the fact that the school may need to make referrals. Raising parents' awareness may avoid later conflict if the school does have to take appropriate action to safeguard a student.
- Ensuring that the Principal knows the status of all *Safe at School* developments in the school using the Principal's checklist and tracking form as a record of monthly meetings.

Child Protection Lead

Kevin Donaghy (DEXA) Kevin.Donaghy@dehong.cn

Each CPL will be a senior member of staff who has the capacity to develop the role to lead any child protection issues; audit child protection records on an annual basis and be a member of the school *Safe at School* Working Party. They should have the

authority and be accessible to teachers and other staff in their school and lead child protection concerns if called upon to do so, keeping the appropriate people informed. Each CPL will have a nominated Deputy CPL who will take on the role during any absence of the CPL.

The CPL will also act as the resource available for other staff, volunteers and members of the Board of Management to draw upon. The CPL is key to ensuring that proper procedures and policies are in place and are followed with regard to child *Safe at School issues*.

The school recognises that:

- The CPLs must be senior members of staff in the school
- All members of staff must be made aware who the CPLs are and what his/her roles are
- The CPLs will need to build effective working relationships with colleagues
- The CPLs should possess skills in recognising and dealing with child welfare concerns
- The CPLs will report to the Principal in referring cases of suspected abuse or allegations to the Dehong CPL, if appropriate and according to the procedures established by Dehong Education.
- The CPLs are not responsible for dealing with allegations made against members of staff; these should only be reported to and managed by the Principal / Dehong Senior Education Advisor. An allegation can be taken directly to the Dehong Senior Education Advisor if the allegation involves the Principal.

To be effective, the CPLs will:

- Act as a source of expertise within the school and be responsible for leading action regarding referrals by liaising with relevant agencies over cases of abuse and allegations of abuse, involving both students and members of staff.
- Liaise with the Principal/Director 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.
- When students leave the school roll, ensure information is transferred to the new school as soon as possible, in accordance with local guidance to schools.

- Ensure that, if a student leaves and the new school is not known, the relevant authorities should be alerted where appropriate, according to PRC law.

The CPLs also have an important role in ensuring 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 any relevant or refresher 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, suitable to their role, to enable them to identify and report any concerns to the CPLs immediately.

Each CPL should:

- Understand and have time to carry out his /her role.
- Ensure that staff have the lines of communication and details of CPLs in the case of reporting child protection concerns.
- Have detailed knowledge of the school'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 the sharing of information is the key to providing effective early help where there are emerging problems.
- Ensure child protection documentation is kept appropriately and monitored regularly, ensuring the outcomes of *Safe at School actions* are reviewed and reported.
- Support staff as needed.
- Attend external professional learning relating to Designated Persons bi-annually and any other advanced training that is requested.
- Be clear about the barriers inhibiting students from disclosing abuse and know how to respond effectively to students who do disclose.
- Support staff reporting concerns.
- Lead the Principal and other staff in making appropriate plans and decisions to address concerns about a student.

- 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 school support services are accessed when appropriate for the student's or family's welfare.
- Identify ways to support staff who may be involved in a *Safe at School* issue.
- Give support to ensure that assessments of any *Safe at School* situation are student-centred, that decisions are made in the student's best interests, are rooted in child development and informed by evidence.
- Ensure that any weaknesses in child protection arrangements are remedied without delay.

School Lead *Safe at School* Trainers:

Victoria Winstock (DEXA) Victoria.Winstock@dehong.cn;

Cathy Zhang (DEXA) Cathy.Zhang@dehong.cn

- Ensure Professional Learning is delivered by recognised Dehong *Safe at School* Trainers.
- Ensure the use of Dehong Education approved training materials.
- Meet virtually with the appointed Dehong *Safe at School* consultant as required.
- Attend Professional Learning annually with other Lead *Safe at School* trainers across the schools.
- Keep up to date with changes in policy.
- Assure the quality of training through observation and peer review.
- Ensure any local changes made to *Safe at School* materials are approved and sent to the Dehong *Safe at School* Consultant.

Each *Safe at School* Trainer will:

- Deliver approved *Safe at School* training as appropriate using approved Dehong materials.
- Attend meetings and professional learning as required.
- Participate in peer reviews and observations of their training.

E Safety Lead

Alex Qiu (DEXA IT) Alex.Qiu@dehong.cn

- Acts as a point of contact on online safety issues and liaising with other members of staff as appropriate
- Works with the leadership team to ensure policies and procedures that incorporate online safety concerns are in place
- Assisting with regular online safety training for all members of staff (including as part of induction)

3.3.2 Reporting and recording

When managing concerns, we consider:

- Each student's developmental needs.
- The role and responsibilities of those involved.
- Family and environmental factors.

We define concerns as:

- *child protection concerns*, where the student is at significant or immediate risk of harm;
- *safe at school concerns*, where students are vulnerable, but not at significant or immediate risk of harm.

Sharing concerns about an adult or student and keeping detailed records of a concern and subsequent actions are important. Recording can ensure continued support of the student during their time at the school and sometimes when they transfer to another setting.

Recording also helps to build up a picture of a case.

All adults, including staff, volunteers, interns, contractors, consultants, board members, guests and visitors must report concerns immediately, maintaining confidentiality and reporting immediately to their identified CPL or Deputy CPL in their absence. They will be asked to record their concerns on the Confidential Record of Concern form (Doc2) (available from the CPL).

The CPL will also record and manage any such concerns about safeguarding and peer abuse. Such concerns will always be taken seriously and acted upon.

A Record of Concern should be completed immediately when a staff member is asked to do so by the CPL. Any paper record of concern should be signed and dated by the

individual making the report and then placed in the CP Safe. This documentation will avoid the report being treated as hearsay if it is ever called for in a court of law.

Reports of child protection concerns should be in the student's best interests, rooted in child development and informed by evidence. Staff must feel confident that they will be supported if they report concerns about a student.

On receipt of a specific child protection concern, the CPL will ensure that the Principal and the SaS Lead are alerted.

In all serious child protection incidents, the Dehong Safe at School Advisor, Kate Beith, the Dehong Safe at School Consultant, will be contacted.

3.3.2.1 Who to report to: general introduction

The 7th Dehong Competency expects all staff and volunteers to know how to share key information safely and who to share it with.

This means that adults should know who to report to if they have a concern about a student and who to report to if they have any concern about the behaviour of an adult.

Adults will not be criticised for raising a concern if it turns out that a student is not at risk.

There are signs around each school to remind adults and students who to go to with concern.

3.3.2.2 Reporting a concern about a student

Concerned about a student?

- Immediately raise the concern with the Child Protection Officer (CPL) or Deputy CPL (DCPL)
- The CPL will decide if the concern is a welfare rather than a child protection issue. He / she may consult with the Designated *Safe at School* Lead (DSSL) and Principal in order to make the decision.

A welfare issue

After discussion a decision is made not to complete a Record of Concern (RoC.) Concern is noted. Adults are praised for reporting and asked to report any further concerns.

A child protection issue

- RoC is completed. Adult records concern. Handwritten and wet signature. Adults are praised for reporting. If an approved digital data system is used, then all concerns are recorded onto the system.
- If a RoC is completed and a file is opened on the student. The RoC and a tracking record are placed inside. A decision is made as to the next steps by the CPL who may have consulted with other adults connected with the student in order to decide.
- If there is no further investigation the Record of Concern is filed. The CPL regularly checks the welfare of the student and adds any comments and records of checks on the Tracking Sheet.
- If there is follow up work with student / teacher / parents, the CPL or teacher supports / works with teacher or parents and regularly checks the welfare of the student and adds any comments / record of checks on the Tracking Sheet (if a digital data system is used the CPL will use the system to track the case).
- Signs of Safety meeting - if the case is to be continued a team around the student is created. This focus team is made up of a small group of adults considered able to support the issue. At the end of a Signs of Safety meeting information will be gathered and recorded. Actions will be taken within one of the following traffic light categories:

Continued support to child and family

- Support from the teacher / CPL to the student and family
- Support from the School Counsellor to the student and family
- Family meeting

External referral support

- Multi-agency support
- Outside referral for support / counselling
- Support and advice from specialist help in other Dehong Schools/EiM Colleges or Schools

Urgent action: taken if the student is at immediate or significant risk of harm

- Further investigation with external support.
- Report to local authorities as required / suitable.
- Contact employer.

Serious physical or sexual abuse will be reported and managed at the highest level led by the Dehong Safe at School Advisor (Lesley Meyer) who will be informed by the Principal of any case involving a Signs of Safety meeting or any other case he / she deem serious. She will seek support of the EiM Chairman (Fraser White).

3.3.2.3 Reporting a concern about an adult

If concerned about an adult

- Immediately raise the concern with the Principal
- The Principal will make one of the following decisions. They may consult with the Dehong Senior Education Advisor.

Following a discussion, a decision not to complete a Managing Allegations Record of Concern (RoC)

- Concern is noted
- Adult/student is reassured and asked to report any further concerns.

Following a discussion, a decision to complete a Managing Allegation RoC

- Adult records concern on the Managing Allegations Record of Concern (Doc 6)
- Handwritten and wet signature
- Adults are praised for reporting and asked to report any further concerns.
- When a RoC is completed
 - A file is opened on the student (a digital version if used by the school) and adult respectively. The RoC and a tracking record are placed inside.
 - A decision is made as to the next steps by the CPL / Principal / DSSL who may have consulted with other adults connected with the student in order to decide.

No further investigation

- The Record of Concern is filed.
- The CPL / DSSL / Principal regularly checks the welfare of the student and adds any comments and record of checks on the Tracking Sheet by hand or an approved digital system.

Working with student / teacher / parents

- The CPL / DCPL or teacher supports / works with teacher or parents.
- Regularly checks the welfare of the student.
- Adds any comments / record of checks on the Tracking Sheet or approved digital system.

Signs of Safety meeting

- A team around the student is created.
- This focus team is made up of a small group of adults considered able to support the issue.
- At the end of a Signs of Safety meeting information will be gathered and recorded. Actions will be taken within one of the following traffic light categories:

Continued support to child and family

- Support from the teacher / CPL / DCPL to the student and family
- Support from the School Counsellor to the student and family
- Family meeting

External referral support

- Multi-agency support
- Outside referral for support / counselling
- Support and advice from specialist help in other Dehong Schools/EiM or external consultants

Urgent action

- Further investigation with external support
- Report to local authorities as required / suitable
- Contact employer
- Contact consulate / embassy
- Contact local agency as required in region of PRC (Dehong legal department will advise)

The Principal will keep the Dehong Safe at School Advisor (Lesley Meyer) informed of the progress of any case he / she deems serious. The Dehong Safe at School Advisor will seek support from the EiM Chairman (Fraser White).

3.3.2.4 Recording, Storing and Transferring Child Protection Records

All file documentation relating to concerns about a student or adult will be kept indefinitely and stored separately in a fireproof safe.

Recording will be made on the Dehong Record of Concern.

Records of Concerns are currently expected to be handwritten as soon as possible.

The CPL or Principal will make sure that staff are enabled to do this.

Records of Concern are not emailed or stored on any electronic devices.

3.3.2.4.1 Confidentiality

The school and all members of its staff will ensure that all data relating to students is confidentially managed in accordance with the requirements of Dehong and applicable PRC national or local guidance, laws or regulations.

Those reporting any child protection concerns will adhere to the lines of communication, ensuring confidentiality.

The CPL will support the process outlined, and the school 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 confidential information about a student and / or the student's family must take all reasonable steps to maintain confidentiality. The Principal/ Director and CPL will agree to the appropriate next steps regarding this information.

Regardless of the duty of confidentiality, any member of staff who has reason to believe that a student is at immediate or significant risk of harm, has a duty to forward this information without delay to the CPL.

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 school.

When someone else might be informed

Breaking a student's or adult's confidentiality is not done unless:

- It is believed a life is in danger.
- A student is being hurt by someone in a position of trust who may also hurt other students.
- If a student discloses, they are seriously hurt by a peer.
- A student or adult discloses about a student who is being hurt and is not able to tell someone or understand what is happening to them.

3.3.2.4.2 Transferring Information

When a student with an active child protection file moves to another school, the school has a clear moral duty to inform or attempt to inform that School that there is an issue about which they should be aware. Schools must check the legal requirements in the region they are operating in, but when the legal position is unclear the Principal must make a phone call rather than transfer documentation if there are any child protection issues.

The Principal must record the call in the student file, including the date and time of the call, who the call was made to, their position in the school and the nature of the communication.

If there is a significant issue to report, there is a duty to call and make the issue known to the Principal; it would not be appropriate to leave information with a secretary or more junior members of staff.

The first duty of any Dehong School is to protect the student and if in doubt it is better to make the call and raise a concern. Further guidance can always be sought from the Dehong Safe at School Advisor.

3.3.2.4.3 Record of Concern and tracking record

This form must be handwritten, and any notes attached.

The Record of Concern is used to track any record of concern once opened.

3.3.2.5 Speak Out Speak Up

A staff member or volunteer 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 students are their priority and should not be unnecessarily at risk.

This is known as 'whistleblowing'.

Reasons for whistleblowing:

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

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 Principal immediately and in her/his absence, the Dehong Safe at School Advisor, Lesley Meyer.

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.

3.3.2.6 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 students in the school.

3.3.3 Codes of Conduct

3.3.3.1 Dehong Education Staff and Volunteer *Safe at School* Code of Conduct.

At Dehong all staff, board members and regular volunteers sign this Code of Conduct (Doc 3). This makes clear what is required of all board members, staff and volunteers and support them in their duty for the care and protection of the student.

We recognise that some people who may be unsuitable for working with students may use volunteering as an opportunity to gain access to students. The Principal will ensure that a risk assessment is undertaken on regular volunteers (including interns) and will determine whether to proceed with criminal record and identity checks. All regular volunteers will also receive the relevant level of *Safe at School training*, sign the Safe at School Code of Conduct. This will be recorded on the single central record (SCR).

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 students. They must also sign the Volunteer *Safe at School Statement*.

3.3.3.2 Visitors and contractors

All visitors who come on campus will be asked to read the statement before being issued a visitor's pass.

The Visitor Code of Conduct (Doc 4) makes clear what is required of all visitors to the school.

Contractors

The school will ensure that all the companies they work with provide evidence of police checks and that any contractors are supervised on site and given appropriate training.

3.3.4 Safer Recruitment

Dehong Education follows strong policies and procedures which ensure that the safety and protection of our students is considered in every step of the recruitment process.

In our process we aim to

- Deter
- Reject
- Prevent
- Detect

To ensure that students are protected while at our Dehong Schools, we will carefully select, screen, train and supervise our staff.

Details of the safer recruitment policy followed can be found in the Dehong Safer Recruitment Policy (Doc 5)

All interns must have police checks and go through the same recruitment process as employed staff members.

3.3.5 Reflection, reviewing and evaluating for impact

The way that we aim to embed The Dehong Safe at School approach across all Dehong schools and central office is to continually reflect, review and evaluate both internally and externally.

3.3.5.1 The audit process

The school will be alternately internally and externally audited on a two-year cycle. The action plan resulting from the audit will be agreed and signed by the following:

- The Dehong auditors
- The Principal
- Designated *Safe at School* Lead
- The Dehong Safe at School Advisor

The *Safe at School* Working Party, chaired by the *Safe at School* Lead, will review the action plan at three meetings per year. The *Safe at School* Lead will discuss the action plan with the Principal at their termly *Safe at School* meetings, and Principal will report progress at each meeting of the Board of Management.

3.3.5.2 Regular review of *Safe at School* action plans

This is achieved through:

- The termly meetings of the *Safe at School* working party
- Audit visits
- Meetings between the Designated *Safe at School* Lead and the Principal
- Board of Management meetings

3.3.5.3 Accessible and regularly reviewed documentation

It is important to review documentation regularly and to ensure that it is effective.

- Child protection files should be regularly discussed and reviewed, always recording these meetings
- Internal School policies and other documentation should be regularly reviewed, and the date identified
- The Dehong DSSLs will meet annually to review the Dehong *Safe at School* Framework.

3.3.5.4 *Safe at School* on all meeting agendas

Safe at School must be a regular agenda item on all regular School and Board meetings.

This may be used for updates, specific discussions or knowledge check activities.

3.3.5.5 *Safe at School* Continued Professional Learning Training Strategy

The school has a *Safe at School* Training Team consisting of:

- Two lead Safeguarding Trainers (one fluent in English, and one fluent in Chinese) and an appropriate number of *Safe at School* Trainers.
- The Professional Learning Directors at the School shall support the *Safe at School* Training Programme.

The role of the Safeguarding Trainer will be added to each job description so that this role forms part of the professional review process.

All training materials will be kept in a designated central location and some available on ConnectED.

The Dehong approach to *Safe at School* learning can be read in the Dehong *Safe at School* Competency and Professional Learning Framework.

To ensure that the Dehong approach to keeping students safe remains consistent across the group, any Dehong School considering engaging with an external provider of any safeguarding and child protection training must seek approval by the Dehong Safe at School Consultant.

3.3.5.6 Parent Student Staff Surveys

Student, Parent and Staff surveys are used to gain feedback and understanding about the *Safe at School* approach within the school.

3.3.6 Keeping Myself Safe

The students learn how to keep themselves safe through a specifically designed learning framework called Keeping Myself Safe. This is delivered by the Banzhuren and by some EML teachers to enable students to talk in the language they feel comfortable with.

4. MANAGEMENT OF SAFE AT SCHOOL CONCERNS ABOUT STAFF AND VOLUNTEERS

Dehong Education is committed to providing the highest level of care for both its students and its staff/volunteers. It is extremely important that any concern raised about the conduct of a member of staff/volunteer or allegations of abuse perpetrated by a teacher, or any other member of staff/volunteer, student or volunteer in our school is managed thoroughly and efficiently, maintaining the highest level of protection for the child whilst also giving support to the person who is the subject of the allegation.

An allegation is made when an adult has a concern that a staff, volunteer or board member may have:

- behaved in such a way that may have harmed a student or may have intended to harm a student acted outside of the law in relation to dealings with a student.
- behaved in any way that suggests they may be unsuitable to work with students.
- behaved in a way that is harmful to the reputation of the School.
- had contact with an Alumni in the two years after they have left the School without using the official school channels.

Dehong Managing Allegations (Doc 6) is designed to ensure that all staff/volunteer, students and parents or carers are aware of the procedure for the management of concerns and the investigation of allegations of abuse by a member of staff/volunteer /volunteer in order that all complaints are dealt with consistently and as efficiently as possible.

Self-reporting

Staff should raise with their line manager any personal difficulties or situations which may impact on their professional behaviour. Staff also have a responsibility to discuss any situation in which their professional competency has been compromised. While such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of students. Where appropriate professional and personal support can be offered.

Staff may seek advice or self-report if they feel compromised as parents of the School in any aspect of safeguarding.

Infatuation

It should be noted that students may develop an infatuation with an adult. If a staff member or volunteer is concerned about this, they must report it to their line manager who will consult with the CPL who will decide on the best way to proceed and give advice accordingly.

5. LOW LEVEL CONCERNS

Adults and students are encouraged to report low level concerns about an adult's behaviour towards any student.

Whilst a low-level concern may not meet the threshold for an allegation against a mentor of staff, board member or volunteer, staff must feel confident in reporting any concern.

A low-level concern is one that does not meet the harm threshold as stated in the **Managing Allegation Policy**. A low-level concern is any concern – no matter how small, and even if it does no more than cause a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff Code of Conduct, including inappropriate conduct outside of work
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the appropriate authority

Examples of such behaviour could include, but are not limited to:

- Being over friendly with students

- Having favourites
- Taking photographs of students on their mobile phone
- Engaging with a student on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language
- Engaging with students on social media
- Using negative language towards a student
- Taking photographs/videos of students on a mobile device contrary to school policy
- Using unnecessary or inappropriate touch
- Engaging with a student on a one to one basis in a secluded area without any visibility such as CCCTV cameras or glass panels.

Such behaviour can vary from the inadvertent or thoughtless, through to that which is intended to enable abuse.

Further information can be found in **Doc 10 Low Level Concerns policy**.

6. SAFE TOUCH

- Safe Touch is a wanted touch that is visible, caring and comforting and can include hugging, pats on the back and an arm around the shoulder.
- Unsafe Touch can be minimal, painful or harmful. It can make a child worried or scared.
- Unwanted touch is a touch a child does not want. Students must know that they have control over who touches their body and how.

There are occasions when physical contact with a student is appropriate. Examples of this could include, but are not exclusive to:

- holding the hand of a young student when going to assembly or when walking together around school/college and school trips (dependent on age/need);
- comforting a distressed student (hand lightly on shoulder);
- a student being congratulated or praised (shaking their hand);
- demonstrating how to use a musical instrument;
- demonstrating exercises or techniques during PE lessons;
- giving first aid treatment.

Students should always be notified that touch is going to happen.

On rare occasions, a staff member may have to make a physical intervention to avoid injury to property or individuals. Staff should only do this:

- where action is necessary in self-defence or because there is an imminent risk of personal injury;
- where there is a developing risk of injury or significant damage to property.

Staff should use their professional judgment, considering their own safety before making the decision to physically intervene. The priority is to de-escalate any situation through talking, the use of body language and giving a calm but firm response. Staff should have exhausted their skills to de-escalate the situation through non-physical methods before resorting to any form of physical intervention.

Contractors, volunteers or other visitors should never initiate any physical intervention but instead contact a staff member.

A Record of Concern on paper or a direct entry onto an approved digital system should be completed immediately when a staff member has to physically intervene to de-escalate a harmful situation.

The CPL will conduct a debrief with the relevant parties before the end of the working day and add a summary report.

If a particular student requires physical intervention as part of an individual care plan, this can only be delivered by a staff member who has received specific training in this area. Contractors, volunteers or other visitors should never initiate any physical intervention but instead make immediate contact with a member of staff.

Further guidelines are available in the School *Safe Touch policy*. Specific briefings are provided for departments such as PE/Swimming, Dance/Drama, Music and Early Years. Attendance must be recorded.

Specific adults in School will receive training bespoke to their role to use reasonable measures to prevent physical harm for any student who may require physical intervention as part of an individual care plan.

7. ALUMNI

During the 2 years after an Alumni (a student becomes part of the alumni the day that they leave school) has left the School, staff members should only make professional contact through official School channels.

批注 [KB1]: @Lesley Meyer Should we mention the age of the alumni? What if they are 13 or is an Alumni a student who leaves at 18?

8. E SAFETY

The school has an E Safety policy (Doc 7) which ensures a student's right to privacy and safety and guides adults in their use of technology.

Visitors should not take any photos or videos unless they have received permission.

Parents should not publish photos of students from school events on public areas of the internet.

The safe use of equipment, applications and systems is central to the school IT policy.

Monitoring and appropriate actions are taken where issues are identified. School is committed to ensuring a safe digital learning community through curriculum plans, professional development, auditing of systems and working with parents. This approach is described in an E-Safety policy and supported by our E-Safety Lead.

Online learning that takes place will do so on School approved platforms. During online learning students and teachers may engage in learning activities in more informal locations that are different to the usual professional classroom environment. It is recognised that online learning can break down barriers and that students may speak more freely. It is important that clear guidance be given to staff, students and parents before online learning takes place.

Staff, students, parents, visitors and volunteers are expected to engage in the safe and responsible use of social media. Any member of staff who 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.

We acknowledge 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, parents are expected to be mindful of sharing photos on social media, especially if other students are visible or if the school/college can be identified.

If parents indicate that they would not like their child's photograph or video to appear in the school's materials, brochures, websites, advertisements or press releases, the School will ensure that their wishes are fulfilled. The school must be held accountable for photos or videos taken by parents or members of the public at School functions and shared via social media or other means.

Staff are expected to take photos of students for educational purposes on School devices. In the unlikely event of taking photos on personal devices, these images must be deleted immediately after being uploaded to school drives.

9. WHO TO CONTACT IF YOU ARE WORRIED? *Do not delay*

Concern about a student?

DEXA

CPL: Elementary school - Kevin.Donaghy Kevin.Donaghy@Dehong.cn
Secondary school - Fallon.Welsh fallon.welsh@dehong.cn

DCPL:

Elementary school - Amber.Liu Amber.Liu@Dehong.cn
Secondary school - Laura.Lei laura.lei@dehong.cn

HQ

Lesley Meyer lesley.meyer@eimglobal.com

If you are in a school:

DEXA: Lily Liu email: lily.LJ.Liu@dehong.cn

Concern about an adult?

DEXA

Lily Liu Email: lily.LJ.Liu@dehong.cn

or the Dehong Safe at School Officer Lesley Meyer

Email: lesley.meyer@eimglobal.com

10. SUPPORTING DOCUMENTATION

1. Dehong Safe at School Competency and Professional Learning Framework
2. Confidential Record of Concern form
3. Dehong Education Staff and Volunteer *Safe at School* Code of Conduct
4. Dehong Visitor Statement
5. Dehong Safer Recruitment Policy
6. Management of *Safe at School* Concerns about conduct of staff and volunteers
7. School E Safety Policy
8. Dehong Safe at School Compliance Document
9. Internal Audit Review Document
10. Dehong Low Level Concerns Policy
11. Peer-on-Peer abuse policy

25-26 Dehong Safe at School Policy

Date of Policy June 2025

Date of next Review: June 2026