

UWC CHANGSHU CHINA SAFEGUARDING POLICY

UWC-CSC Safeguarding Policy

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UWC-CSC Policy Statement on Safeguarding

The *UWC-CSC Safeguarding Policy* outlines the position and commitments of the school on safeguarding young people¹ in the UWC-CSC community against abuse by adults².

UWC-CSC recognizes a moral responsibility to prevent physical, sexual, and psychological abuse² of young people, and to prevent endangerment of young people.

UWC-CSC makes a commitment to do the following:

- Serve as a safe haven for young people experiencing abuse in any part of their lives.
- Educate all adults, young people, and parents in the school community on recognizing and preventing abuse.
- Require each adult in the community to sign the *Community Agreement on Safeguarding*.
- Require each employee to make mandatory reports of suspected abuse.
- Avoid any form of corporal punishment of young people³.
- Specify the safeguarding responsibilities related to each role in the school.
- Establish and promote a clear, safe reporting and record-keeping process for all concerns about safeguarding.
- Record and investigate each reported allegation of abuse or other safeguarding violations, following a clear, specific procedure.
- Follow safe hiring practices to ensure that no employee presents a specific risk to young people.
- Complete an annual audit and review of safeguarding practices, cases, procedures, and policies.

These commitments are detailed in the policy components below:

The *Safeguarding Policy* is detailed in the following Policy Components:

- *UWC-CSC Policy Statement on Duty of Care*
- *Community Agreement on Safeguarding*
- *Safeguarding Roles and Responsibilities*
- *Safeguarding Action Commitments*
- *Safeguarding Audit and Review Commitments*
- *Procedures for Responding to Abuse*
- *Key Contacts for Safeguarding*

The *Safeguarding Policy* is closely related to these other policies:

- *UWC-CSC Employee Handbook (Safe Recruitment Policy under review)*
- *UWC-CSC Visitors Policy (currently under review)*
- *UWC-CSC Safe Hiring Standards (currently under review)*

¹ *Young person*: Children, enrolled students (regardless of age), and “third-year” interns (interns employed under contract with USC-CSC, who have graduated high school in the last two years, regardless of age); see the *UWC-CSC Policy Statement on Duty of Care* ² *Adult*: Person aged 18 or older, except those defined as *young person* above.

² As defined in https://www.cdc.gov/violenceprevention/pdf/cm_surveillance-a.pdf

³ See http://www.gov.cn/xinwen/2020-10/18/content_5552113.htm.

Policy Adopted by the Board of UWC-CSC, 2018-11-29.

Updated and Adopted Date: 2021-10-1.

UWC-CSC Policy Statement on Duty of Care

UWC-CSC recognizes a duty to care for the physical, emotional, and mental wellbeing of all young people, including children, students, and third-year interns, in our community. We take responsibility for protecting the rights and wellbeing of young people as described in:

- The *Law of the People's Republic of China on the Protection of Minors*, the *Anti-Domestic Violence Law of the People's Republic of China*, Law of the People's Republic of China on the Prevention of Juvenile Delinquency and all other relevant laws, regulations, and judicial opinions⁴
- The *United Nations Convention on the Rights of the Child*⁵
- The *UWC Mission & Values*⁶
- The *UWC Common Standards on Safeguarding*⁷

UWC-CSC here outlines a specific duty of care which meets or exceeds the responsibilities described in the sources above:

- To maintain the physical safety and health of all young people in our care.
- To support the emotional, mental and social wellbeing of all young people in our care.
- To encourage the moral and personal development of all young people in our care.
- To integrate all young people in our care into a cohesive and positive school community.
- To create a positive and respectful environment for young people in our care.
- To respect the fundamental equality of young people.
- To uphold the fundamental personal freedom of each young person.
- To develop social standards in which each young person exercises their freedom in a way that enables the freedom of others, and does not diminish the freedom of others.

UWC-CSC recognizes that its duty of care applies to (any of):

- Enrolled students (regardless of age)
- Children (under 18)
- "Third-year" interns (interns employed under contract with UWC-CSC, who have graduated high school in the last two years, regardless of age)

Community Agreement on Safeguarding

Each adult and student member of the UWC-CSC community is required to make certain commitments to protecting young people in the community. This requirement is established in the *Safeguarding Policy*.

⁴ http://english.www.gov.cn/archive/laws_regulations/2014/08/23/content_281474983042599.htm

⁵ <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

⁶ <https://drive.google.com/file/d/1qPAeAY9CANNPtX92LYwjhw7CwkQP45Bgl/view> , pp. 11.

⁷ <https://www.uwc.org/page/?title=The+UWC+Common+Standards+for+Safeguarding&pid=8068>

The following abusive behaviors are not tolerated in UWC-CSC:

- Any hitting, pushing, grabbing, or otherwise physically harming a young person.
- Any sexual act, contact, or interaction by an adult with a young person.
- Any attempt by an adult to develop an inappropriately intimate friendship or relationship with a young person.
- Any shouting at, insulting, belittling, degrading, intimidating, or otherwise emotionally harming a young person in a deliberate and intentional way.
- Any person knowingly and unnecessarily exposing a young person to potential harm.
- Any adult willfully withholding care from a young person.
- Any act of sexual assault by any person against any person.
- Any of the above acts by a student against another student.

Each adult and student is responsible for reporting potentially abusive behavior to the Designated Safeguarding Lead.

All questions related to Safeguarding should be directed to the Designated Safeguarding Lead (DSL) or to either Deputy Designated Safeguarding Leads.

Agreement:

- I agree to refrain from all abusive, violent or otherwise harmful behaviors described above.
- I agree to report, within 24 hours, any abuse of a young person to the Designated Safeguarding Lead or a Deputy DSL or, if not available, to another teacher or administrator.
- I agree to report, within 24 hours, any behavior which suggests an adult and/or young person may pose a risk to young people to the Designated Safeguarding Lead or Deputy DSL or, if not available, to another teacher or administrator.

Name:

Date:

*This document will be kept by the Human Resources office and updated on an annual basis. Report of 100% completion of all staff in the first month of the new school year.

Safeguarding Responsibility and Roles

This policy component specifies the responsibilities for Safeguarding attached to each role in the school.

Individual Roles and Responsibilities Each Adult in the Community

- Reads, understands, and formally agrees to the Community Agreement on Safeguarding.
- Reports within 24 hours, concerns of suspected abuse to the Designated Safeguarding Lead or a Deputy DSL or, if unavailable, to the Principal.
- Specific allegations against the Principal, DSL, Nominated Individuals for Safeguarding may be reported directly to Board Members.
- Specific allegations against Board Members may be reported directly to the Safeguarding Team.
- Reports questions, concerns, or suggestions about the Safeguarding Policy to the Designated Safeguarding Lead.

The Board

- Approves and supports the Safeguarding Policy as part of the Policy of the school.
- Signs the Community Agreement on Safeguarding.
- Establishes and maintains relations with the Expert Team.
- Makes resources available to the Principal concerning the legal obligations of the school.
- Reviews the Safeguarding Policy to ensure that it conforms to local law.

Principal

- Creates and supports the school-based Safeguarding Team.
- Initiates the process of the adoption and review of the Safeguarding Policy and Safeguarding Curriculum.
- Submits the Safeguarding Policy to School Lawyer for compliance with local laws and international conventions/obligations.
- Gains Board cooperation and approval for the Safeguarding Policy.
- Provides support in the budget on an annual basis for the Safeguarding Team to ensure that adequate training and resources are available.
- Assists the Board in developing and maintaining collaborative relationships with other schools and agencies to improve safeguarding.
- Ensures that external organizations, vendors, contracted service providers and other entities comply with the school's Safeguarding Policy and that the school provides an annual in-service program for these personnel. Example: food service personnel, security personnel, personnel assisting with school trips, coaches who are not part of school staff, after school activities personnel or other outsource agencies.
- Appoints the Designated Safeguarding Lead.
- Forms and supervises the Response Team for suspected cases of abuse of young people.
- Follows written procedures for response and investigations to allegations and concerns about safeguarding.
- Conducts official communication outside of the school related to safeguarding.
- Sends an annual letter to parents, teachers, and students emphasizing the importance of safeguarding practices.

- Supervise and ensure the effective implementation of this Safeguarding Policy and lead the inspection and rectification about safeguarding work of the school to timely eliminate safety risks.
- Report safety incidents (if any) to the outside authorities in a timely manner and support the school in submitting required reports to outside authorities.

Vice Principals

- Assists the Principal in meeting these responsibilities in their related areas of work or as specifically delegated.

Designated Safeguarding Lead (DSL)

- Leads the Safeguarding Team.
- Receives all allegations and concerns related to safeguarding.
- Receives reports of disclosures and determines whether they constitute low-level concerns or specific allegations.
- Creates a confidential record of each specific allegation of abuse and each low-level concern.
- Maintains confidential records of all incidents, decisions, and disclosures related to Safeguarding.
- Informs the Principal and Director of Campus Life of specific allegations of abuse in a timely manner.
- Organizes professional development on Safeguarding for teachers.
- Organize and carry out training related to safeguarding for all students and staffs.
- Ensures that all staff are properly trained in handling sensitive and confidential student information.
- Informs parents of students involved in issues related to safeguarding, subject to risk assessment.
-

Deputy DSL

- Assists the DSL as required.
- Serves as the proxy for the DSL in his or her absence.

Director of Campus Life

- Reviews the Safeguarding Policy and an overview of the Safeguarding elements of the Wellbeing Curriculum with the Student Life Team.
- Ensures that all Heads of House and other residential workers are supporting the Safeguarding Policy.
- Supports Heads of House in recognizing and responding to possible signs of abuse.
- Ensures that the physical facilities of the school are conducive to safeguarding.
- Maintains a record of the name and contact information of each person who holds a leadership role mentioned in the Safeguarding Policy.
- May be appointed Designated Safeguarding Lead.

Deputy Director of Campus Life (Health and Wellbeing)

- Ensures that the Wellbeing Curriculum meets the requirements of the Safeguarding Policy.

- Monitors delivery of the Wellbeing Curriculum and provides constructive feedback to session leaders.
- May be appointed Designated Safeguarding Lead.

Deputy Director of Campus Life (Community Living)

- Establishes residential policies which support the aims of the Safeguarding Policy.
- Establishes protocols for finding students missing from school.
- Maintains and reviews residential security procedures.
- Reports threats and concerns specific to the residences to the Director of Campus Life.
- Ensures that nurses and counsellors are specifically trained to detect and respond to signs of abuse.
- Consults with the Director of Campus Life, Deputy Director of Campus Life (Health and Wellbeing) and Social-Emotional Counsellors to coordinate residential programs with other Safeguarding programs.
- Produces an annual report on safety and security in the student residences.
- May be appointed Designated Safeguarding Lead.

Social-Emotional Counsellors

- Receive confidential disclosures of suspected abuse of young people.
- Report all such disclosures and safeguarding concerns to the Designated Safeguarding Lead.
- Review the Wellbeing curriculum with an understanding of overall child development and appropriateness.
- Coordinate with the Director of Campus Life to hold parent meetings or to draft communications to assist parents in understanding the need for the program and to answer questions and provide support.
- Develop a culture of trust and help-seeking in the designated residential block.
- May be appointed Designated Safeguarding Lead.

Heads of House

- Align House activities with the aims of the Safeguarding Policy.
- Receive confidential disclosures of suspected abuse of young people.
- Report all such disclosures and safeguarding concerns to the Designated Safeguarding Lead.
- Develop a culture of trust and help-seeking in the House.
- Serve on the Safeguarding Team as needed.

All Staff

- Receive confidential disclosures of suspected abuse of young people.
- Report all such disclosures and safeguarding concerns to the Designated Safeguarding Lead.
- Serve on the Safeguarding Team as needed.
- Attend training on Safeguarding during staff orientation and/or on designated Professional Learning Day(s).
- Assist with lessons in the Wellbeing Curriculum as needed.

Human Resources Manager

- Check and document all staff completion of safeguarding training.
- Report monthly regarding training statistics to the Principal.
- Report monthly concerns of background check as identified in Safe Recruitment Policy.

Safeguarding Policy Teams

The Safeguarding Policy establishes two types of teams related to safeguarding: the Safeguarding Team and Response Teams.

- **Safeguarding Team:** A permanent group of faculty members responsible for achieving the aims of the Safeguarding Policy. The Safeguarding Team is appointed by the Principal every academic year.
- **Response Team:** A temporary group of faculty members appointed by the Principal or the DSL to investigate an allegation of abuse. The Response Team may contain external professionals as required.

The roles of members of these teams are described here:

Safeguarding Team members

- Develop and review Safeguarding training and related resources.
- Assist in delivery of Safeguarding training.
- Assist the Director of Campus Life and the Social-Emotional Counselors in planning parent meetings and communications related to Safeguarding.
- Contribute to the annual review of Safeguarding policies, procedures, and practices.
- Contribute to the annual reports on Safeguarding at the school.
- Contribute to the annual review of the Community Agreement on Safeguarding.

Response Team members

- Investigate the assigned case of suspected abuse of a young person.
- Document all steps taken, inquiries made, and results obtained.
- Prepare a report presenting findings and recommending sanctions and restorative actions as necessary.
- Present report and documentation to the Principal and DSL.
- Maintain security and confidentiality of all documentation during and after the investigation.
- Advise the Safeguarding Team and school leaders on local laws, regulations, agencies, and resources.
- Support the school in completing required reports to outside authorities.
- Assist in investigation of sensitive and severe cases of suspected abuse of young people.
- Executive Committee of the Board takes over Response Team from the Principal or DSL to receive, record, and investigate allegations of abuse by the Principal or DSL.

Expert Team

- Led by the Designated Safeguarding Lead at UWC International Office and includes other designated safeguarding experts.

Safeguarding Action Commitments

This policy component details the actions the school will take to prevent abuse of young people. These actions are meant to be concrete and subject to annual audit.

Preventative Practices

UWC-CSC works to prevent harm and abuse in the whole community:

- The school provides all adults with clear, specific guidelines on appropriate behavior.
- The school ensures that each adult is aware of their obligation to report suspected abuse of students.
- The school provides mandatory annual training to employees in order to help them carry out the responsibilities of their roles. This training will include:
 - Understanding school policy on safeguarding
 - Recognizing abuse and endangerment
 - Reporting concerns about safeguarding
 - Best practices for safeguarding and for fulfilling our duty of care.
- The school will prepare, deliver, and continually review a Wellbeing curriculum promoting a safe community. These topics include:
 - Abuse: its definition, types, consequences, detection, and prevention.
 - Personal boundaries and consent
 - Healthy and unhealthy relationships
 - Online safety
 - Confidentiality
- The school keeps and reviews confidential records of reported concerns and specific allegations about abuse of young people.
- The school acts to encourage help-seeking, trust, and reporting of low-level concerns and specific allegations.
- The school conducts regular reviews of the environment, policies, and incident records to improve safeguarding practices.
- The school continually educates community members and parents on the Safeguarding Policy.
- The school performs due diligence on new hires, and keeps a complete set of official background checks or a written risk assessment endorsed by the Principal for each employee.
- The school forms and maintains a Safeguarding Team and an Expert Team.
- The school establishes and makes available written procedures and protocols for reporting, investigating, and responding to concerns and allegations related to safeguarding.
- The school makes available the contact information of all individuals holding specific responsibilities in the Safeguarding Policy.

Record Keeping Practices

UWC-CSC keeps clear, confidential records of all incidents and activities related to Safeguarding.

- All specific allegations of abuse are recorded with written reports following a standard format (see appendix I for Incident Report Form).
- All investigations are recorded with written reports on both process and outcome.
- All meetings on Safeguarding are recorded with agendas and minutes.
- All decisions, actions, and interpretations related to Safeguarding policy are recorded in writing.
- All records are kept in a central, secure location, and are backed up to protect against loss.
- All records are clearly marked with permission levels to explicitly state who may access them.
- All faculty are trained in the correct procedures for making and accessing records.

Training

UWC-CSC ensures that all community members are adequately trained to prevent abuse of young people.

- The school creates an annual plan for teacher training on Safeguarding before the beginning of each academic year.
- The school creates an annual schedule of topics related to Safeguarding for inclusion in the Wellbeing Curriculum before the beginning of each academic year.
- Teachers complete at least 2 hours of training on the Safeguarding Policy each year.
- Teachers complete at least 2 hours of training on best practices for Safeguarding each year.
- Students complete at least 4 hours of education per year related to the aims of the Safeguarding Policy and Practice.
- The school conducts a survey for teacher feedback on Safeguarding training once per year.

Safeguarding Audit and Review

This policy component specifies the annual review process which ensures that the Safeguarding Policy is followed carefully, and is meeting the needs of young people in the community.

Safeguarding Audit

The school Safeguarding Team completes an annual audit of Safeguarding practices and completes a written report. This audit begins 1 March, and the report is published by 1 April. This report:

- Addresses all Actions specified in the Policy, evaluating the extent to which they were performed.

- Examines all recorded Safeguarding incidents and evaluates the extent to which proper procedures were followed.
- Evaluates the extent to which faculty members are fulfilling the responsibilities of their roles.
- Identifies strengths and successes in the school's Safeguarding practices.
- Identifies weaknesses and shortcomings in the school's Safeguarding practices.
- Recommends good practices for future emphasis.
- Recommends actions needed to address weaknesses and shortcomings.
- Recommends a specific Action Plan, for implementation within 3 months of publication.

The report is made available to all faculty members and to the Expert Team. An abbreviated version with no references to specific Safeguarding incidents is made available to all adults, students, and parents in the school community. This abbreviated form includes all recommendations and includes the full Action Plan.

Policy Review

The school produces an annual report examining the Safeguarding Policy itself in comparison with experience during the academic year. The policy should be evaluated relative to these aims:

- Assert the principles guiding our safeguarding commitment.
- Define terms related to safeguarding in a clear way.
- Establish specific responsibilities for safeguarding.
- Specify verifiable actions which the school commits to performing in order to realize our safeguarding commitment.
- Create institutional forces that ensure that the responsibilities and actions in the policy are carried out.
- Support the creation of specific procedures for meeting these responsibilities.
- Support the establishment of school practices which protect young people from abuse and endangerment by other members of the community.

The school also checks the Policy for coherence with other policies. This review begins on April 1 and ends before May 1. This report is made available to all faculty members and the Expert Team. An abbreviated version with no references to specific Safeguarding incidents is made available to all adults, students, and parents in the school community.

Any recommended changes to the Safeguarding Policy are developed, drafted, and approved before the end of the academic year.

Action Plan Follow-up

The school Safeguarding Team produces a brief report examining the Action Plan from the Annual Review. This report evaluates the extent to which the items of the Action Plan have been completed. This review begins after May and ends before June 1. This report is made available to all adults, students, and parents in the school community.

Procedures for Responding to Abuse

This policy component specifies the protocols and procedures the school will follow regarding concerns, allegations, and findings related to abuse of young people. A list of definitions of key terms follows the protocols and procedures: defined terms are italicized in the first use.

Response Protocols

Response to Low-Level Concerns related to Safeguarding

1. The DSL records each *low-level concern* reported, and compares each report received to previous reports on record.
2. The DSL looks for patterns of concerns that suggest a serious or ongoing problem: in these cases, the DSL reports the concern to the Principal.
3. In all other cases, the DSL keeps the records of low-level concerns confidential.

Response to Specific Allegations of Abuse

1. The DSL will immediately inform the Principal and Director of Campus Life and curb the abuse immediately if the abuse is likely to cause material harm and has substance.
2. The DSL will make a detailed, confidential report of the *specific allegation*, and will compare the allegation to previous reports on record.
3. The DSL and Principal will determine whether there is *reasonable cause to believe* the allegation has substance.
 - If not, the DSL will note this finding on the report of the allegation, and the inquiry will cease.
 - Otherwise, continue:
4. The Principal will immediately form a Response Team to address the allegation.
5. The Principal will ensure that the Response Team completes the *Investigation Procedure for Allegations of Abuse* as quickly and appropriately as possible.
6. The Principal will, with the assistance of the Response Team, make a final determination on the facts of the case, and a final decision on the school's response.
7. The DSL will ensure that a complete account of the investigation, findings of fact, and school response is added to the report on the allegation, and that the report is properly stored for future reference.

Procedures

Investigation Procedure for Allegations of Abuse

When the Principal and DSL find reasonable cause to believe a specific allegation of abuse, the Principal will appoint a Response Team to carry out the following investigation steps:

1. Conduct a risk assessment and discussion to guide all actions needed to ensure the wellbeing of all involved, following a standard format (see appendix II for Safeguarding Concern Assessment and Discussion form).
2. Subject to the requirements of the risk assessment, inform each alleged victim of the alleged abuse, confidentially and as soon as possible.
3. Subject to the requirements of the risk assessment, inform the accused of the allegations against them, confidentially and as soon as possible.

4. Subject to the requirements of the risk assessment, inform the parents of the student(s) involved in the alleged abuse, victim and perpetrator, confidentially and as soon as possible.
5. Gather required information to document the allegation.
6. Gather all available evidence for and against the allegation.
7. Analyze evidence and determine whether a *preponderance of evidence* supports the allegation.
8. Prepare a report for the Principal on:
 - The factual basis of the allegation.
 - The relationship between the allegation and the *Employee Handbook, Student Handbook* and other relevant laws and regulations.
 - The recommended response from the school.

Ensuring Wellbeing During Investigation

Alleged abuse is considered severe when, in the judgment of the Response Team, it would potentially cause serious or permanent physical or psychological harm. All alleged sexual abuse is considered severe.

In cases of alleged severe abuse, the school will take the following steps:

- The Principal will immediately place an employee suspect on paid leave for the duration of the investigation. While on leave, the employee suspect will not take part in any school activities and will not have any informal contact with any young person.
- The Principal will make any arrangements of supervision or accommodation needed to ensure that the employee suspect does not have any informal contact with any young person.
- The Principal will consult with the School Lawyer in order to assess the legal rights responsibilities of the school, the employee suspect, and the community members directly involved, and will assist the School Lawyer in reporting to and cooperating with the relevant legal authorities.
- An employee found to have severely abused a young person will be immediately terminated and barred from the school grounds.
- If the suspect is a student, The Principal will make any arrangements of supervision or accommodation needed to ensure that the student suspect does not have any informal contact with any other young person. The DSL will contact parents/guardians of the student suspect as soon as possible.

Due Process Protections for Allegations of Abuse

Because of the seriousness of an accusation of abuse, both young people and adults are entitled to certain protections of due process:

- The accused must be informed of the allegations against them in a speedy and confidential way.
- The identifying details of each *person of interest* must be kept confidential.
- The details of the investigation must be kept confidential.
- During information-gathering meetings, each person of interest may be accompanied by a supporting person, provided that the supporting person is not also a person of interest. Supporting persons include:

- For young people: An advisor, head of house, social-emotional counselor, family member, or another specified person with the approval of the Principal.
- For adults: A family member, colleague, lawyer, representative of the Human Resources department, or another specified person with the approval of the Principal.
- The Principal and the Response Team must make every reasonable effort to conclude the investigation as quickly as possible.
- The accused will not be subject to administrative or criminal sanction except as specified in official policies or in local laws and regulations.
- During the investigation, the school must make every reasonable effort to protect each person of interest from retaliation, discrimination, and harm outside the scope of official policies and local laws and regulations.
- If an allegation is widely known in all or part of the school community, the Principal will disclose the fact that an investigation is taking place to the relevant part of the school community. Further, the Principal will disclose the basic finding (that the allegation is true or false). If the case is closed with no conclusive finding, this fact will be similarly disclosed. These disclosures will be made in a timely and sensitive way, and in a way which privileges the confidentiality of the persons of interest.

Outside Notification of Findings of Abuse

The Principal will notify the UWC International Organization of any response to abuse in which:

- A staff member is disciplined
- A student is expelled
- Another person is subject to criminal legal action

The Principal will also notify the National Committee of any student expelled in response to abuse.

The School Lawyer will assist the school in making any legally-required notifications to local authorities.

Supplemental Notes Allegations of Abuse by School Leadership Members

Specific allegations against the Principal, DSL, Nominated Individual for Safeguarding, or Board Members may be reported directly to the most senior member of the governance team (Exco) who is not subject to allegation or to the Expert Team for Guidance. The Expert Team will then handle the investigation and record-keeping, maintaining confidentiality. The Expert Team will investigate anonymous reports which are substantiated with verifiable evidence. The Expert Team will investigate all non-anonymous reports and will endeavor to maintain the highest possible level of confidentiality for the reporter's identity. The Expert team will follow the same investigation procedures given below, to the extent that this is possible.

Allegations of Abuse by Other Young People

In the event of a specific allegation of abuse by another young person, the procedures above will be followed as much as possible. However, particular care must be taken to ensure the wellbeing and due process protections of the accused young person.

Allegations of Abuse of Young People by Family Members

If the DSL and Principal have reasonable cause to believe a young person is being abused by a family member, the Principal will assist the Board and the School Lawyer in reporting the case to the Public Security Bureau, according to the school's obligation under the *Anti-Domestic Violence Law of the People's Republic of China (2016)*. When a concern relates to abuse by a family member in another country, the support of UWC International will be sought by the Principal.

Definitions

Young person: Children, enrolled students (regardless of age), and “third-year” interns (interns employed under contract with USC-CSC, who have graduated high school in the last two years, regardless of age)

Adult: Persons aged 18 or older, except those defined as *young person* above.

DSL: Designated Safeguarding Lead. The person in charge of all reporting related to Safeguarding. See *Safeguarding Roles and Responsibilities*.

Confidentiality: Confidentiality is an important principle that enables people to feel safe in sharing their concerns and to ask for help. Sharing relevant information with the right people at the right time is vital to good safeguarding practice.

Specific allegation: A specific allegation identifies a certain individual as a claimed abuser or potential abuser, and identifies certain speech, behavior, or actions claimed to have occurred. The name of any young person involved need not be known for the allegation to be specific. The identification of concerning speech, behavior, or actions must be sufficiently concrete, but need not be exact or highly detailed.

Reasonable cause to believe: A person has reasonable cause to believe a specific allegation if they have specific knowledge which suggests the allegation is true.

Preponderance of evidence: An allegation is supported by a preponderance of evidence if more evidence is found to support the allegation than to dispute the allegation.

Person of interest: A person who has made an allegation of abuse, is alleged to have committed this abuse, or is alleged to have suffered this abuse.

Low-level concern: A low-level concern is a report describing events which may suggest that an individual is at risk, presents a risk, or is involved in poor Safeguarding practices, but which fall short of being a specific allegation⁸.

Sexual Abuse: Sexual abuse may involve: physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts (e.g. masturbation, kissing, rubbing and touching outside of clothing); non-contact activities, such as involving young people in looking at or producing sexual images, watching sexual activities, or encouraging young people to behave in sexually inappropriate ways, or grooming a young person in preparation for sexual exploitation – including via the internet.

⁸ See this paper on the importance of documenting low-level concerns:
<https://cdn.icmec.org/wp-content/uploads/2020/02/28153641/Low-level-concern-sample-response-Farrer-2020.pdf>

[Policy Adopted by the Board of UWC-CSC, 2018-11-29.](#)

[Updated and Adopted Date: 2021-10-1.](#)

Key Safeguarding Contacts Academic Year 2021-22

This list is kept updated by the Director of Campus Life, and is made available to all students and faculty members.

This list was last updated 2021-08-01.

Designated Safeguarding Lead and Vice Principal of Student Life

Simon Hua Ma (马骅)

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Deputy Designated Safeguarding Leads

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Principal

Simon Head

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Nominated Individual for Safeguarding

Wesley Chiu (UWC-CSC Board)

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Expert Team Members

Philine Nau (UWC International)

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Appendix I

Incident Report Form

Date of incident:		Time of incident:	
Student(s) involved:		Year Group:	
Advisor:		Head of House:	
Location of incident:		Safeguarding concern:	
Staff involved:		First aid staff involved:	
Report written by:		Date report written:	

What was taking place before the incident:
Describe the incident with as much detail as possible:
Actions taken by the staff member:
Actions taken by the first aid staff member:
People informed (please check the box) <input type="checkbox"/> Advisor <input type="checkbox"/> Head of House <input type="checkbox"/> Nurse <input type="checkbox"/> Student Life Team <input type="checkbox"/> Safeguarding Team (DSL) <input type="checkbox"/> Principal <input type="checkbox"/> Other:
Other remarks: e.g. Does a student statement(s) need to be taken?

If this is a report of a safeguarding issue, please send this report by email to the DSL, any of the Deputy DSLs, or safeguarding@uwcchina.org

Appendix II

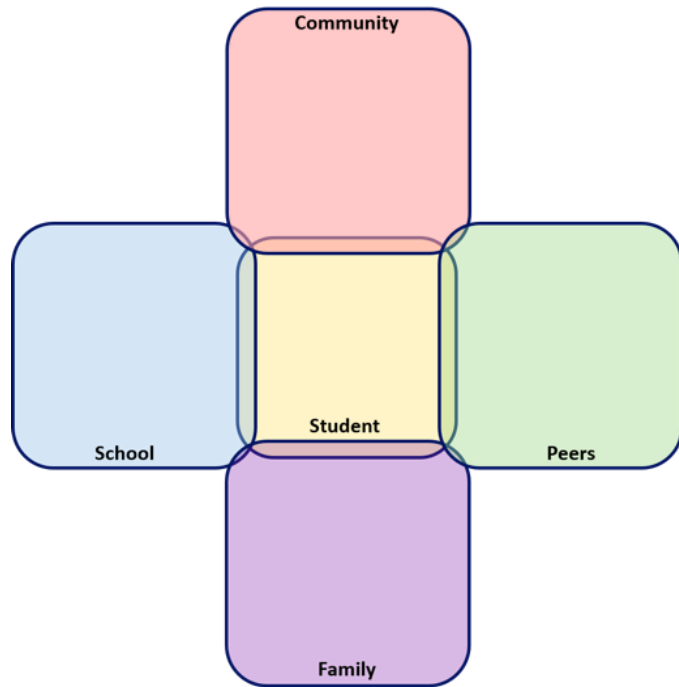
Safeguarding Concern Assessment and Discussion

Date/Time:	
Attendees:	
Individual of concern	

Overarching Guiding Premise	
Present State	What is the current situation?
Vision	What is the desired outcome?
Potential	Clear Actions that get us from Present State to Vision

Case Management Steps	
1.	Assess
2.	Case discussion
3.	Intervention
4.	Communicate
5.	Follow up

**Contextual
Safeguarding
Model**



1. Assess Concern:

- What information is known?
- Facts: Date, time, identifying information for those involved, location, source of this information.
Risks: individual, community, physical, psychological, mitigation plan

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2. Case discussion:

- Use above Contextual Safeguarding Model to identify Strengths and Vulnerabilities in all areas of life. This will highlight areas of risk and targets for intervention.

Other Discussion Questions:

- Is there anyone we can consult to get a better understanding of what's happening?
- What cultural considerations should be thought of?
- Do we need to inform anyone immediately of this concern?
- Can we quickly take any action that would shed light on this situation?
- Ultimately what can be done systemically to lower risk.

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3. Intervention:

- Indicate - who will take action and by when. Break actions down into the minutiae to ensure all appropriate steps are covered and nothing is missed.
- Immediate Actions to be taken - who is responsible for managing the situation and making sure tasks are completed?

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4. Communicate:

- Who needs to know what actions will be taken?
- Who needs to know this issue is occurring? (other schools, local authorities, teachers, parent, regional staff).
- Documentation: ensure all records are kept up to date including progress made

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5. Follow-up:

- When are we meeting next as a team?
- Who is responsible to ensure follow up?
- Determine timeframe for self-evaluation in responding to the crisis

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