

UWC CHANGSHU CHINA SAFEGUARDING POLICY

Reviewed Annually

UWC-CSC Safeguarding Policy

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I. UWC-CSC Policy Statement on Safeguarding

The *UWC-CSC Safeguarding Policy* outlines the position and commitments of the College on safeguarding young people¹ in the UWC-CSC community against abuse by adults and their peers.

UWC-CSC recognizes a moral responsibility to prevent neglect, 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 College community on recognizing and preventing abuse.
- Require each staff member 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 College.
- 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)*
- *UWC-CSC Visitors Policy*
- *UWC-CSC Safe Hiring Standards*

¹ *Young person*: Children, enrolled students (regardless of age), and “third-year” interns (interns employed under contract with USC-CSC, who have graduated high College 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 [UN Convention on the Rights of the Child](#)

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

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II. UWC-CSC Policy Statement on Duty of Care

UWC-CSC is committed to holistic education by integrating safeguarding into the curriculum, fostering a culture of personal responsibility and trust within our community. This approach empowers students to understand the importance of safeguarding not only for their own well-being but also for that of their peers. By embedding these principles into educational practices, we encourage open communication and mutual respect, ensuring that every individual feels valued and protected. This commitment to safeguarding as a core component of our educational philosophy enhances the overall development of young people, preparing them to navigate challenges with confidence and integrity.

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 social, emotional, and mental 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 College 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 College in the last two years, regardless of age)

⁴ http://www.npc.gov.cn/zgrdw/englishnpc/Law/2007-12/12/content_1383869.htm

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

⁶ <https://drive.google.com/file/d/1qPAeAY9CNNPtX92LYwjhw7CwkQP45Bgl/view> , pp. 11.

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

III. 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*.

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.

Follow the Safeguarding Guidelines which serves as a specific code of conduct related to the duties and responsibilities of staff and faculty in safeguarding and fostering a safeguarding culture at the college.

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 College year.

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IV. Categories and Signs of Abuse

Abuse situations are rarely standalone events that can be described by one definition or label. In most cases, multiple forms of abuse occur together. In addition, children with disabilities are statistically more vulnerable to abuse and abuse may be more challenging to recognize due to characteristics associated with certain disabilities (i.e., Autism Spectrum Disorder, ADHD, intellectual disability, communication disorder, mental health conditions, etc.).

What constitutes abuse?

Abuse is any form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by strangers. They may be abused by an adult(s) or another child(ren).

One of the most effective ways to protect children is to be aware of the signs of possible abuse. All employees should be aware of the signs of abuse and neglect so they are able to identify children who may need protection. In most cases, these signs will manifest themselves in children who are the victims of abuse.

Abuse is categorized into four main types: physical, sexual, emotional, and neglect. All employees should be familiar with the definitions below which include common signs and symptoms of abuse that may necessitate follow-up. It is important to recognize that some children who are sexually exploited or abused do not exhibit any external signs of abuse. Sometimes children do not even recognize what is happening to them as abusive. Additionally, it can sometimes be difficult to tell the difference between injuries suffered as part of normal childhood activities and those caused by abuse.

Definition of Physical Abuse

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

There is rarely a single sign or symptom that proves a child is being physically abused; if a child often has injuries, there seems to be a pattern of injuries, or the explanation given by the child or parent does not match the injury, the injury should be investigated further.

Possible signs of Physical Abuse

- Unexplained bruises and welts on any part of the body
- Bruises of different ages (i.e., various colors)
- Injuries to parts of the body where accidents are unlikely to occur (i.e., thighs, back, abdomen, including human bite marks)
 - Injuries reflecting the shape of the article used (i.e., electric cord, belt buckle, paddle, hand/finger marks, etc)
- Injuries that regularly appear after College absence or vacation
- Burns with a pattern from an electric burner, iron, or cigarette
- Untreated or inadequately treated injuries

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- Unexplained burns, especially to the soles, palms, back, or buttocks
- Rope burns on arms, legs, neck, or torso • Immersion burns with a distinct boundary line
- Unexplained lacerations, abrasions, fractures, scarring, scalds, burns
- Respiratory problems from drowning, suffocation, or poisoning

Definition of Sexual Abuse

Sexual abuse is a form of abuse which involves forcing or enticing a child to take part in sexual activities, regardless of whether the child is aware of what is happening. It does not necessarily involve a high level of violence. Activities may involve physical contact, including assault by penetration (i.e., rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in the viewing or production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be committed by adults of any gender, as well as other children.

Possible signs of Sexual Abuse

Sexually transmitted infection in a child of any age

Evidence of physical trauma or bleeding to the oral, genital, or anal areas

Pain, itching, bleeding, bruising, discharge to the genital area, anus, or mouth

- Urinary infections
- Persistent sore throats or stomach aches • Difficulty walking or sitting
- Refusing to change into PE clothes
- Pregnancy with no history of peer socialization
- Sexual knowledge, behavior, or use of language not appropriate to age level

Definition of Emotional Abuse

A form of abuse which involves the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another. In addition, emotional abuse may involve serious bullying (including cyberbullying), causing children to frequently feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may also occur as a standalone form of abuse. Signs of emotional abuse tend to be behavioral in nature.

Possible signs of Emotional Abuse

- Habit disorders (i.e., sucking, biting, rocking)
- Aggressive or disruptive behavior (i.e., acting out, demanding attention, requiring more discipline than other children)
- Anger or disinterest
- Being frightened of certain adults
- Feeling sad, withdrawn, or depressed
- Difficulty sleeping
- Eating disorders
- Self-harm, suicidal ideation, or attempted suicide
- Lacking confidence or having low self-esteem • Using drugs or alcohol
- Overly adaptive behavior (inappropriately adult, inappropriately infantile, or needy)

Definition of Neglect

Neglect is a form of abuse where there is a persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. It may also include neglect or unresponsiveness to a child's basic physical or emotional needs.

Possible signs of Neglect

- Appears underweight or is very small for age, weight deterioration
- Inadequate food intake and/or poor nutrition (i.e., lacks energy, swollen stomach, constantly hungry, steals or hides food)
- Appears very overweight for age
- Improperly clothed, with inadequate protection from the weather
- Poor personal hygiene or unwashed clothing
- Often absent from College for no apparent reason or persistently arrives late
- Regularly left alone or in charge of younger siblings
- Unattended medical or dental problems
- Untreated skin or hair conditions (i.e., rashes, sores, flea bites, head lice, etc.)
- Frequently tired or fatigued
- Emotional withdrawal
- Alcohol or substance misuse
- Developmental delay (i.e., weight, language, social skills, etc.)

These situations do not always mean a child is intentionally neglected. Sometimes cultural values, the standards of care in the community, and poverty may be contributing factors, indicating the family needs guidance or assistance from the College. When a family fails to utilize resources provided and the child's health or safety is at risk, child welfare interventions may be required.

V. Safeguarding Responsibility and Roles

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

The College's safeguarding policies explicitly adheres to both local laws and UWC Common Standards, ensuring that the most stringent measures are implemented to protect young people. This commitment reflects our dedication to maintaining a safe environment that meets or exceeds legal requirements and best practices in safeguarding. By aligning our policies with these standards, we aim to uphold the highest level of care and responsibility in all aspects of safeguarding within our community.

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 College.
- 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 College.
- Reviews the Safeguarding Policy to ensure that it conforms to local law.

Principal

- Creates and supports the College-based Safeguarding Team.
- Initiates the process of the adoption and review of the Safeguarding Policy and Safeguarding Curriculum.
- Submits the Safeguarding Policy to College 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 Colleges and agencies to improve safeguarding.

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- Ensures that external organizations, vendors, contracted service providers and other entities comply with the College's Safeguarding Policy and that the College provides an annual in-service program for these personnel. Example: food service personnel, security personnel, personnel assisting with College trips, coaches who are not part of College staff, after College 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 College 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 College to timely eliminate safety risks.
- Report safety incidents (if any) to the outside authorities in a timely manner and support the College 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.
- 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 College 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.

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 of specific allegations of abuse in a timely manner.
- Organizes professional development on Safeguarding for teachers and students.
- Organize and carry out training related to safeguarding for all students and staffs.

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- Ensures that all staff are 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 their absence.

Head of Social and Emotional Counseling

- 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.

Head of Residential Life

- Establishes residential policies which support the aims of the Safeguarding Policy.
- Establishes protocols for finding students missing from College.
- Maintains and reviews residential security procedures.
- Reports threats and concerns specific to the residences to the Vice Principal (Student Life)
- Ensures that nurses and counsellors are specifically trained to detect and respond to signs of abuse.
- Consults with the Vice Principal (Student Life) and Head of Social and Emotional Counseling 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 Head of Social and Emotional Counseling and Vice Principal (Student 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.

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- Receive confidential disclosures of suspected abuse of young people.
- Report all such disclosures and safeguarding concerns to the Designated Safeguarding Lead or a Deputy DSL or, if unavailable, to the Principal..
- 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, or a Deputy DSL or, if unavailable, to the Principal..
- 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 Vice Principal (Student 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 College.
- 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.

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- 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 College leaders on local laws, regulations, agencies, and resources.
- Support the College in completing required reports to outside authorities.
- Assist in investigation of sensitive and severe cases of suspected abuse of young people.
- Board Chair 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 external designated safeguarding experts.

VI. Safeguarding Action Commitments

This policy component details the actions the College 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 College provides all adults with clear, specific guidelines on appropriate behavior.
- The College ensures that each adult is aware of their obligation to report suspected abuse of students.
- The College provides mandatory annual training to employees in order to help them carry out the responsibilities of their roles. This training will include:
 - Understanding College policy on safeguarding
 - Recognizing abuse and endangerment
 - Reporting concerns about safeguarding
 - Best practices for safeguarding and for fulfilling our duty of care.
- The College 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 College keeps and reviews confidential records of reported concerns and specific allegations about abuse of young people.
- The College acts to encourage help-seeking, trust, and reporting of low-level concerns and specific allegations.

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- The College conducts regular reviews of the environment, policies, and incident records to improve safeguarding practices.
- The College continually educates community members and parents on the Safeguarding Policy.
- The College 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 College forms and maintains a Safeguarding Team and an Expert Team.
- The College establishes and makes available written procedures and protocols for reporting, investigating, and responding to concerns and allegations related to safeguarding.
- The College 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 College will schedule at least two formal training sessions each academic year for both staff and faculty and for students. These training sessions will cover essential topics related to safeguarding, promoting a culture of awareness and proactive engagement. By prioritizing education and awareness, we aim to empower all members of our community to contribute to a safe and supportive environment for young people.

- The College creates an annual plan for teacher training on Safeguarding before the beginning of each academic year.
- The College creates an annual schedule of topics related to Safeguarding for inclusion in the Wellbeing Curriculum before the beginning of each academic year.
- The Board complete at least two hours of training on the Safeguarding Policy and practices each year.
- Teachers complete at least two hours of training on the Safeguarding Policy each year.

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- Teachers complete at least two hours of training on best practices for Safeguarding each year.
- Students complete at least four hours of education (Student Orientation, Sex Education, CARE social and emotional well-being program) per year related to the aims of the Safeguarding Policy and Practice.
- The College conducts a survey for teacher feedback on Safeguarding training once per year.

VII. 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 College Safeguarding Team completes an annual audit of Safeguarding practices. This audit begins 1st May, and the audit will:

- 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 College's Safeguarding practices.
- Identifies weaknesses and shortcomings in the College'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 three months of publication.

Policy Review

The College reviews the Safeguarding Policy 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 College 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 College practices which protect young people from abuse and endangerment by other members of the community.

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Adopted Date: 2025-08-01.

The College also checks the Policy for coherence with other policies. This review begins on May 15th and ends before June 15th.

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

VIII. Procedures for Responding to Abuse

This policy component specifies the protocols and procedures the College 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 Vice Principal (Student 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 College's response.
7. The DSL will ensure that a complete account of the investigation, findings of fact, and College 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, consider temporarily suspending all contact, both in-person and online, with young people by the accused individual.
5. 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.
6. Gather required information to document the allegation.
7. Gather all available evidence for and against the allegation.
8. Analyze evidence and determine whether a *preponderance of evidence* supports the allegation.
9. 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 College.

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 College 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 College 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 College Lawyer in order to assess the legal rights responsibilities of the College, the employee suspect, and the community members directly involved, and will assist the College 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 College 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 College 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 College community, the Principal will disclose the fact that an investigation is taking place to the relevant part of the College 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 College Lawyer will assist the College in making any legally-required notifications to local authorities.

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Supplemental Notes

Allegations of Abuse by College 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 College Lawyer in reporting the case to the Public Security Bureau, according to the College'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.

IX. Washroom Policy

Staff and visitor toilets are separate from student toilets.

Signage is posted in both English and Chinese. Staff and adult visitors are not allowed to be in the student washrooms. Students are not allowed to be in staff and visitor washrooms unless accessing handicap washrooms.

X. Definitions

Young person: Children, enrolled students (regardless of age), and “third-year” interns (interns employed under contract with USC-CSC, who have graduated high College 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>

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XI. Key Safeguarding Contacts

Academic Year 2025-2026

This list is kept updated by the Vice Principal (Student Life) and is made available to all students and faculty members.

This list was last updated 2025-06-01.

Designated Safeguarding Lead

Vice Principal (Student Life)

Simon Hua Ma (马骅)

hma@uwcchina.org

Deputy Designated Safeguarding Leads

Head of Social and Emotional Counseling

Kate Ying Li

kateli@uwcchina.org

Head of Residential Life

Nian Liu (刘念)

nliu@uwcchina.org

Head of Respectful Community

Jay Weinman

jweinman@uwcchina.org

Principal

Simon Head

head@uwcchina.org

Nominated Individual for Safeguarding

Wesley Chiu (UWC-CSC Board)

wesley.chiu@uwcchina.org

Expert Team Members

Designated Safeguarding Lead (UWC International)

safeguarding@uwc.org

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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, DDSLs) <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

Make sure that report of any abuse of a young person and/or any behavior which suggests an adult and/or young person may pose a risk to young people is made to the Designated Safeguarding Lead or a Deputy DSL or the Principal or, if not available, to another teacher or administrator, as soon as possible and must be within 24 hours of the incident.

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

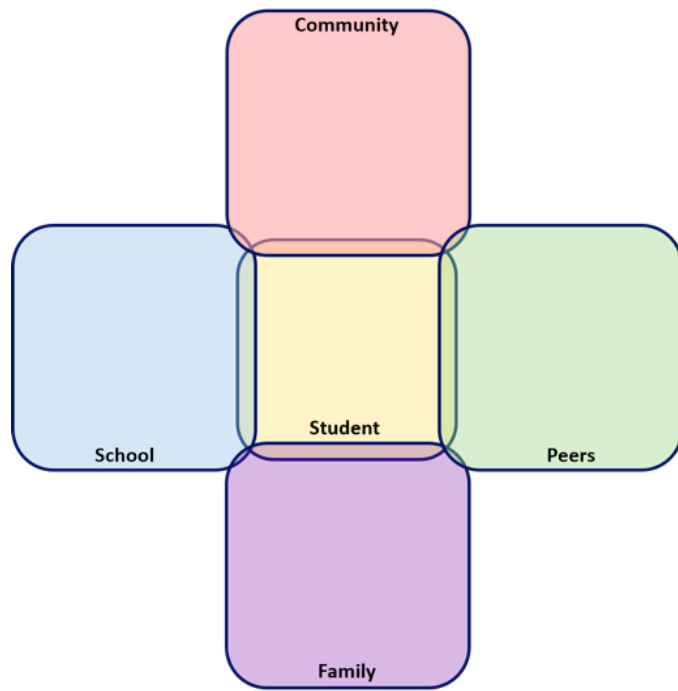
Case Management Steps	
1.	Assess
2.	Case discussion
3.	Intervention
4.	Communicate
5.	Follow up

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**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 what action and by when. Break actions down into the minutiae to ensure all appropriate steps are covered.
- 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? (staff, College leadership, parents/guardians, local authorities)
- 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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