



UWC CHANGSHU CHINA

SAFEGUARDING POLICY

Policy Adopted by the Board of UWC-CSC, 2018-11-29.
Review Date: 2019-03-01.

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 abuse³ 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 people⁴.
- 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.
- Establish an outside Expert Team to advise the school and oversee investigations.
- 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*
- *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 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.

³ As defined in https://www.cdc.gov/violenceprevention/pdf/cm_surveillance-a.pdf

⁴ See http://www.npc.gov.cn/englishnpc/Law/2007-12/12/content_1383869.htm, Articles 21 and 25. *Policy Adopted by the Board of UWC-CSC, 2018-11-29.*

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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*, and all other relevant laws, regulations, and judicial opinions⁵
- The *United Nations Convention on the Rights of the Child*⁶
- The *UWC Mission & Values*⁷
- The *UWC Common Standards on Safeguarding*

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 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 school community.
- To create a positive and respectful environment for young people in our care.
- To respect the fundamental equality 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 student (regardless of age)
- Student of another high school
- Child (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)

While they are (any of):

- Living in the school
- Under the authority of the school⁸
- Visiting the school under the auspices of a school activity
- Visiting the school at the invitation of a community member
- Employed by the school

⁵ <https://www.icmec.org/wp-content/uploads/2017/11/ICMEC-China-National-Legislation-Nov-2017.pdf> and especially http://www.npc.gov.cn/englishnpc/Law/2007-12/12/content_1383869.htm and <http://en.pkulaw.cn/display.aspx?cgid=261780&lib=law>

⁶ <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

⁷ <https://drive.google.com/file/d/1qPAeAY9CNNPtX92LYwjhw7CwkQP45Bgl/view> , pp. 11.

⁸ From day of arrival until day of departure, except while on leave under the authority of their parent or guardian.

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Community Agreement on Safeguarding Template

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

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 Lead.

| | | |
|------------------------------|---------------|---------------|
| Designated Safeguarding Lead | Deputy DSL | Deputy DSL |
| Name | Name | Name |
| Email Address | Email Address | Email Address |

Agreement:

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

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 concerns of suspected abuse to the Designated Safeguarding Lead or Deputies or, if unavailable, to the Dean of Student Life or to the Principal.
- Reports questions, concerns, or suggestions about the Safeguarding Policy to the Designated Safeguarding Lead.

Board member

- Adopts the Safeguarding Policy as part of the Policy of the school
- Gives public statement positioning the school as a safe haven for children
- Gives public statement of support of the Safeguarding Policy
- Meets with parents to support safeguarding as an important topic
- Adopts the Community Agreement on Safeguarding that all adults at the school (paid or unpaid), including the Board Members themselves, sign
- Establishes and maintains relations with the Expert Team

School Lawyer

- Represents the school in all interactions with legal authorities.
- Informs the Board Members and Principal of the legal obligations of the school in the host country.
- Reviews the Safeguarding Policy to ensure that it conforms to local law.

Nominated Individual for Safeguarding

- Participates in the overall governance of UWC-CSC or is nominated by the UWC International Organization.
- Reviews policies and practices related to Safeguarding in the school.
- Maintains familiarity with all aspects of Safeguarding in the school.

Principal

- Creates and supports the school-based Safeguarding Team.
- Initiates the process of the adoption of a Safeguarding Policy and Safeguarding Curriculum.
- Submits Safeguarding Policy to School Lawyer for compliance with local laws and international conventions/obligations.
- Gains Board cooperation and approval for 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, 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 Response Team for suspected cases of serious 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.

Vice Principal

- Assists the Principal in meeting these responsibilities as specifically delegated.

Designated Safeguarding Lead (DSL)

- Leads the Safeguarding Team.
- Receives all allegations and concerns related to safeguarding.
- Receives reports of disclosures from the Social-Emotional Counselors and determines whether they constitute low-level concerns or specific allegations.
- Creates confidential record of each specific allegation of abuse and each low-level concern.
- Informs Principal and Dean of Student Life of specific allegations of abuse.

Deputy DSL

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

Dean of Student Life

- Reviews the Safeguarding Policy and an overview of the Safeguarding elements of the Life Skills 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 adequate parent training related to safeguarding
- 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.
- Maintains confidential records of all incidents, decisions, and disclosures related to Safeguarding.
- May be appointed Designated Safeguarding Lead.

Deputy Dean of Student Life (Community Learning)

- Ensures that the Life Skills Curriculum meets the requirements of the Safeguarding Policy.

- Monitors delivery of Life Skills Curriculum and provides constructive feedback to teachers.
- Organizes professional development on Safeguarding for teachers.
- Ensures that all staff are properly trained in handling sensitive and confidential student information.
- May be appointed Designated Safeguarding Lead.

Deputy Dean of Student 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 Dean of Students.
- Ensures that nurses and counselors are specifically trained to detect and respond to signs of abuse.
- Consults with the Dean of Students, Deputy Dean of Student Life (Community Living) and Social-Emotional Counselors 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 Counselor

- Receives confidential disclosures of suspected abuse of young people.
- Reports all such disclosures to the Designated Safeguarding Lead.
- Reviews available safeguarding curriculum with an understanding of overall child development and appropriateness.
- Coordinates with the Dean of Students to hold parent meetings to assist parents in understanding the need for the program and to answer questions and provide support.
- Identifies resources in the community that are available to the school.
- Assists the Dean of Students in maintaining Safeguarding records.
- May be appointed Designated Safeguarding Lead.

Head of House

- Aligns House activities with the aims of the Safeguarding Policy.
- Develops a culture of trust and help-seeking in the House.
- Serves on the Safeguarding Team as needed.
- Makes sure that anyone who works with them, either paid or unpaid, understands the Safeguarding Policy, signs the Community Agreement on Safeguarding, and understands clearly the school's stand on Safeguarding.

Teacher

- Serves on the Safeguarding Team as needed.
- Attends training on Safeguarding.
- Teaches lessons of the Life Skills Curriculum as needed.
- Makes sure that anyone who works with them, either paid or unpaid, understands the Safeguarding Policy, signs the Community Agreement on Safeguarding, and understands clearly the school's stand on Safeguarding.

Safeguarding Policy Teams

The Safeguarding Policy establishes 3 types of teams related to safeguarding: the Safeguarding Team, the Expert 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 to investigate an allegation of abuse.
- **Expert Team:** A permanent group of professionals outside the school established by the Board to support the school in investigations of abuse. The Expert Team includes members drawn from multiple disciplines related to Safeguarding, such as medicine, law, government, psychology, social work, and education.

The roles of members of these teams are described here:

Safeguarding Team member

- Develops and reviews Safeguarding training and related resources.
- Assists in delivery of Safeguarding training.
- Assists the Dean of Student Life and the Social-Emotional Counselors in planning parent meetings and communications related to Safeguarding.
- Performs annual review of Safeguarding policies, procedures, and practices.
- Produces annual reports on Safeguarding at the school.
- Produces and reviews the Community Agreement on Safeguarding.

Response Team member

- Investigates the assigned case of suspected abuse of a young person.
- Documents all steps taken, inquiries made, and results obtained.
- Prepares a report presenting findings and recommending sanctions and restorative actions as necessary.
- Presents report and documentation to the Principal and DSL.
- Maintains security and confidentiality of all documentation during and after the investigation.

Expert Team member

- Advises the Safeguarding Team and school leaders on local laws, regulations, agencies, and resources
- Assists in investigation of sensitive and severe cases of suspected abuse of young people, including any case involving any school leader.
- Supports the school in completing required reports to outside authorities
- Receives, records, and investigates allegations of abuse by school leadership members.

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 Life Skills 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.
- All investigations are recorded with written reports on both process and outcome.
- All meetings on Safeguarding are recorded with agendas and minutes.

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- All decisions, actions, and interpretations related to Safeguarding policy are recorded in writing.
- All records are 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 completes and approves an annual plan for teacher training on Safeguarding before the beginning of each academic year.
- The school completes an annual schedule of topics for pastoral education related to Safeguarding 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 hour 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.
- The school conducts a survey for teacher feedback on Safeguarding training once per year and produces a written report on the results.

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 completes an annual audit of Safeguarding practices and completes a written report. This audit begins 1 January, and the report is published by 28 February. 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 adults.

The school also checks the Policy for coherence with other policies. This review is begun after March 1 and completed before April 30. 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 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 is begun after May 1 and completed before May 30. 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 Dean of Student Life
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 *reasonable cause to believe* the allegation exists.
 - 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 for each young person involved, and take any steps needed to ensure the wellbeing of young people going forward (see *Ensuring Wellbeing During Investigation* below).
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 adult 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 alleged victim of the alleged abuse, 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* and other relevant laws and regulations.
 - The recommended response for 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 the adult suspect on paid leave for the duration of the investigation. While on leave, the adult 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 accomodation needed to ensure that the adult 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 adult suspect, and the community members directly involved, and will assist the School Lawyer in reporting to and cooperating with the relevant legal authorities.
- An adult found to have severely abused a young person will be immediately terminated and barred from the school grounds.

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 adult 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 from the school community for the duration of the investigation.
- 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: A crew leader, house mentor, 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 adult will not be subject to sanction or discrimination 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 way, and in a way which privileges the confidentiality of the persons of interest.
- In any conflict between the due process interests of a young person and an adult, the school will favor the interests of the young person.

Outside Notification of Findings of Abuse

The Principal will notify the UWC International Organization 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 Expert Team. The Expert Team will then handle the investigation and record-keeping, maintaining a high level of 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 endeavour 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 below will be followed as much as possible. However, extra 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)*.

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*.

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 to conceivably be falsified by evidence, 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 allegation⁹.

⁹ See this paper on the importance of documenting low-level concerns: <https://www.icmec.org/wp-content/uploads/2017/08/Low-Level-Concerns-Article-May-2017-final-version-.pdf>
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Key Safeguarding Contacts Academic Year 2018-19

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

This list was last updated 2018-11-29.

Designated Safeguarding Lead and Dean of Student Life

Simon Ma (马骅)

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