



JOINT SAFEGUARDING AND PROTECTING PEOPLE POLICY (2020)

Known as 'Joint SPP Policy 2020'

Agreed and adopted by the following:

Dr Graham's Homes, Kalimpong, India (The Homes)

The Board of Management of Dr Graham's Homes, Kalimpong, India (BOM)

UK Committee, Dr Graham's Homes, Kalimpong, India (DGHUK); Scottish Charity Number: SC050985

BACKGROUND

The BOM operates **Dr Graham's Homes**, a campus in Kalimpong, India. The Homes was founded by a Scottish missionary, Dr John Anderson Graham, more than 120 years ago. Dr Graham's vision was to advance the prospects of impoverished children from greater Calcutta, by providing a safe environment and a Christian education.

DGHUK supports the BOM by funding the education, board and lodgings of about 200 children and young people per year. DGHUK seeks donations for this purpose and raises funds by administering a sponsorship scheme and fundraising activities.

PURPOSE

The purpose of this Joint Safeguarding Policy is to ensure appropriate practices and procedures are in place to protect all adults involved in and/or supporting the work of Dr Graham's Homes, and all pupils of the school regardless of age. **It is the duty of all Board Members, Trustees, staff members and volunteers to read this policy, sign to say they have read it, and to ensure that it is fully implemented.**

This will be a joint effort by The Homes, the BOM and DGHUK. We will operate by **raising awareness, preventing, responding, reporting and reviewing** any incidents of harm, harassment by, or abuse of, any children (beneficiaries), members of staff, volunteers, trustees, board members, supporters and donors, visitors to The Homes, contractors / suppliers and fundraisers.

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SUPPORTING STANDARDS - This policy is based upon the following international and national legislation, good practice and standards:

Applicable to all parties:

- Human and Child Rights UN Charters, Conventions and Declarations, principally the [United Nations Convention on the Rights of the Child, 1989 \(UNCRC\)](#) and its Optional Protocols
- [The Core Humanitarian Standard on Quality and Accountability](#)

BOM	DGHUK	The Homes
Protection of Children from Sexual Offences Act (POCSO) 2012 Dr. Graham's Homes Child Protection and Safeguarding Policy, 2020 (Known as 'DGH Safeguarding Document') includes provisions of Indian law	- Office of the Scottish Charity Regulator (OSCR) Safeguarding Guidance (May 2018) - National Guidance for Child Protection in Scotland (2014) - National Society for the Prevention of Cruelty to Children (NSPCC) advice, training and guidance	Protection of Children from Sexual Offences Act (POCSO) 2012 Dr. Graham's Homes Child Protection and Safeguarding Policy, 2020 (Known as 'DGH Safeguarding Document') includes provisions of Indian law

LEAD SAFEGUARDING PERSONS

BOM	DGHUK	The Homes
Lead Safeguarding Person(s) within the BOM: Mr. Michael Shane Calvert - President of the BOM (+91 9830048100, e: mscalvert21@gmail.com) Capt. Prakash Pradhan - Chairman, DGH Safeguarding Committee (e: captppmp@gmail.com)	Chair of Safeguarding Sub-Committee: Peter Cook (safeguarding@drgrahamshomes.co.uk) Sponsorship Secretaries: Ian & Anji Russell (sponsorship@drgrahamshomes.co.uk)	Lead Safeguarding Person(s) within The Homes: The Principal - Mr. Neil Monteiro (+91 99339 99270, e: neilconrad69@gmail.com) The Headmaster - Mr. Pravin Pradhan (+91 9434308822, e: pravinprads64@gmail.com) Lead Safeguarding Officer - Mrs. Jeena Raghavan (Senior Teacher) (+91 9434075082, e: jeenakpg@gmail.com)

REVIEW DATES

This policy was agreed by all parties in January 2021. Reviews will take place annually wherever possible.	Dates of reviews carried out: Reviewed and revised April 2023 Amended June 2024
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DEFINITION OF ABUSE:

Abuse: A form of maltreatment of a person/s.

- Somebody may abuse or neglect an adult or child by inflicting harm, or by failing to act to prevent harm

There are four main types of abuse as defined under the [UK Government Guidance 'Working Together to Safeguard Children' 2018](#)

- o Physical
- o Emotional
- o Sexual
- o Neglect

- *See [Appendix A](#) for full descriptions of the types and signs of abuse*
- *See [DGH Safeguarding Document](#) for further descriptions defined under Indian Law*

Within DGHUK, the BOM and The Homes, potential victims or perpetrators may be any of the following:

- o Children (beneficiaries)
 - o Members of staff, volunteers, trustees, board members
 - o Supporters & donors
 - o Visitors to the Homes
 - o Contractors/suppliers
 - o Fundraisers
- Abuse may take place in a family, or in an institutional or community setting, by those known to them or by others (e.g. via the internet).
 - Abuse may be carried out by an adult or adults, or another child or children. This may be adult to child, adult to adult, child to adult or child to child.
 - A child is understood to be any person under 18 years of age.

1. RAISING AWARENESS		
BOM	DGHUK	The Homes
<p>Training for Board Members: Members of the Board receive Safeguarding training annually.</p> <p>This is delivered by an expert in the subject, e.g. Child Safety Officer of the Government or a person authorised / equipped / skilled to conduct such Safeguarding training. Training is completed online.</p> <p>The BOM ensures that appropriate training is being delivered to <u>all</u> the staff in The Homes as follows: Policy directions are taken at the BOM level. Such policies, as are recommended by the DGH Safeguarding Committee. Such directions are then conveyed to the School Executives through the School Managing Committee for follow up.</p> <p>Monitoring the effectiveness of the training: The DGH Safeguarding Sub-committee requires detailed feedback through the School and also gathers feedback independently to check the efficacy of training programmes. They will take feedback at the end of every training session that is organised in the School for the children, staff and non-teaching staff.</p>	<p>Training for UK Trustees and Staff:</p> <ol style="list-style-type: none"> 1. NSPCC Safeguarding training for Trustees (Updated every three years from October 2020) 2. Safeguarding updates given at each trustees meeting 3. Induction training – Available from the DGHUK Secretary <i>Note: This Safeguarding Policy should be a key part of all induction procedures.</i> 4. All Trustees and staff to read and sign the Trustees Code of Conduct – Available from the DGHUK Secretary 5. All Trustees and staff to read and sign the Electronic Communications Policy – Available from the DGHUK Secretary 6. All Trustees and staff to read and sign the Joint Safeguarding and Protecting People Policy (2020) 	<p>Training for All Teaching and Non-teaching staff: All staff members to receive Safeguarding training annually. It is delivered by local resource persons working in the area of child protection, usually officials connected with BSA (Bal Suraksha Abhiyan). It is delivered by means of face-to-face and online training.</p> <p>Awareness raising for Parents School to provide information about the school's safeguarding policies and procedures to parents.</p> <p>Awareness raising for children: Children are made aware during special assemblies and workshops that they can tell any adult, at any time, if they feel uncomfortable, or are hurt by, any actions of others. These workshops are conducted separately for boys and girls according to age groups.</p> <p>In these assemblies and workshops, the children are also made aware of what is inappropriate behaviour by them and towards them.</p> <p>They are also told of the importance of not giving personal contact details to adults.</p>

<p><u>Guidance for Visitors to the Homes:</u> Board Members and other Supporters: Board members visit the School Campus only on work matters. The Principal is informed well in advance and permission to visit is sought. In this way the School officers are made aware of the visit of Board members. On special School Occasions when members of the Board of Management and/or School Managing Committee visit The Homes for official meetings and school functions, a list of the confirmed invitees must be prepared and sent to the security personnel at the entry points to facilitate smooth access. All such visitors may also be given differently coloured identity cards to be worn by them for easy identification. Board members are never alone with any child.</p> <p>General Visitors (See details in DGH Safeguarding Document):</p> <ul style="list-style-type: none"> • Visits are by prior appointment only • Visitor slip completed on arrival at entry point and checked against the list of approved visitors • Visitors i/d card worn on coloured lanyard when on campus 	<p><u>Guidance for Visitors to the Homes:</u> Groups and individual visitors to the Homes : Issued with guidance before each planned visit Appendix C</p> <p><u>Guidance for Sponsors, Correspondents:</u> Issued with guidance for communication between sponsors, correspondents and pupils Appendix D</p> <p><u>Guidance for Fundraisers:</u> Issued with DGHUK Guidance for Fundraising Appendix E</p>	<p><u>Guidance for Visitors to the Homes:</u> Visitors from Abroad: All visitors will follow the procedure laid down in Appendix C</p> <p>General Visitors (See details in DGH Safeguarding Document):</p> <ul style="list-style-type: none"> • Visits are by prior appointment only • Visitor slip completed on arrival at entry point and checked against the list of approved visitors • Visitors i/d card worn on coloured lanyard when on campus <p>Visiting Speakers It will be the responsibility of the Principal and Headmaster to invite speakers and school guests to official functions of the school. Such a list of invitees must be thoroughly vetted and screened before an invitation to the Homes is actually offered.</p>
<p><u>Guidance for managing a disclosure of abuse made by a child or adult:</u> The procedures are delineated in detail in the DGH Safeguarding Document, which is based in part on the advice given in the Joint SPP Policy 2020 (See Appendix B). It follows the best practices in schools in India and also includes provisions of Indian law keeping the local situation in mind.</p>	<p><u>Guidance for managing a disclosure of abuse made by a child or adult:</u> See Appendix B</p>	<p><u>Guidance for managing a disclosure of abuse made by a child or adult:</u> See Appendix B Also, see DGH Safeguarding Document, which is based in part on the advice given in the Joint SPP Policy 2020. It follows the best practices in schools in India and also includes provisions of Indian law keeping the local situation in mind.</p>

2. PREVENTING		
BOM	DGHUK	The Homes
<p>Assessing Risks: Risk assessments to reduce opportunities of abuse are carried out by the DGH Safeguarding Sub-committee.</p> <p>The President has made personal assessments. Members will be updated of their rights and privileges as well as their duties in this regard.</p> <p>Security at The Homes: The Principal has been auditing security and safety measures that are already in place. Security personnel have been informed to be vigilant concerning unexpected visitors at all times. Newer measures to monitor entry points have been put in place.</p> <p>In addition to the above, the principal has been asked to prepare a report for upgrading Security systems, including the setting up of fences in a phased manner, introduction of CCTV cameras at more strategic points, and he has been asked to consider the employment of women security personnel at the Cottages occupied by girls, at least during the daytime. The effectiveness of this will be monitored regularly by the SMC.</p> <p>Mitigating risks of pupil-to-pupil abuse: The BOM has clearly instructed the school that pupils must always be under the supervision of appropriate adults at all times till they turn in for the day. There is a clear-cut policy and set of procedures to deal with bullies. Bullies must be punished appropriately, and counselling will be made available for both bullies and victims.</p>	<p>Assessing Risks: DGHUK has identified a number of possible areas of risk, both to the safety of the children who are beneficiaries of the charity, and also to those who care for them.</p> <p>The principal risks are: exploitation or abuse of:</p> <ul style="list-style-type: none"> • adult to pupil (staff, visitors and adults off-campus) • pupil to pupil • pupil to adult • adult to adult • campus security <p>The purpose of this Joint Safeguarding Policy is to ensure appropriate practices and procedures are in place to protect all those involved in Dr Graham's Homes. <u>Adherence by all parties to this policy and its associated procedures will greatly mitigate these risks.</u></p> <p>This will be a joint effort by the DGHUK, the BOM and The Homes.</p>	<p>Assessing Risks: Risk assessments to reduce opportunities of abuse are carried out by the DGH Safeguarding Sub-committee.</p> <p>To ensure that the physical campus of The Homes is a secure and safe place for all children, the security systems are being upgraded, security procedures are being reviewed and this includes the positioning of female security guards, which is being considered at least for the daytime.</p> <p>Mitigating risks of pupil-to-pupil abuse: The Homes will ensure that there are responsible adults supervising or checking up on the pupils on a regular basis.</p> <p>Persistent bullies are punished through various means, which may include suspension and even expulsion. Both victims and bullies are counselled by the school counsellor.</p>

<p><u>Safer Recruitment for:</u> Board Members: A Society named “Dr. Graham’s Homes, Kalimpong”, was formed under the West Bengal Societies Act XXVI of 1961. (Last printed in 1963).</p> <p>The Society is governed by a Governing Body, now called the Board of Management, to whom, by Rules of the Society, the management of affairs is entrusted.</p> <p>Members are selected/nominated from among members of the Society. (No qualifications are specified in the Memorandum of Association).</p> <p>A minimum of 8 and a maximum of 20 members make up the Board. Three members of the Board of Management shall retire by rotation annually at a meeting at which the Annual Accounts are tabled. Such rotation is to be determined according to the dates of their election. However, members who so retire shall be eligible for re-election.</p> <p>Background checks are carried out for all Board Members. Names are suggested/proposed, profiles are collected and members deliberate and then decide who to elect. A formal letter of invitation is sent and when consent has been obtained, the members join officially</p>	<p><u>Safer Recruitment for:</u> Trustees:</p> <ol style="list-style-type: none"> 7. See ‘Selection Criteria and Process for Eligibility to Being Elected as a Trustee’ - Available from the DGHUK Secretary - ‘Protecting Vulnerable Groups’ (PVG) checks are carried out on all trustees. The check is managed and delivered by Disclosure Scotland <p>Staff & Volunteers in the UK: DGHUK will diligently screen all prospective staff and volunteers. People with a prior conviction for any crime against children, or sexual exploitation or abuse against an adult will not be engaged by DGHUK.</p> <p>This screening will include, (where applicable) addressing safeguarding matters on application forms, self-declaration statements, questions during interviews and when obtaining references, PVG (Scotland) checks, induction, probationary periods and general on-going supervision.</p> <p>External Agencies and Contractors: DGHUK will ensure that any external agency or contractor engaged to work with children or young people who are beneficiaries of the charity, have the following in place:</p> <ul style="list-style-type: none"> - Safeguarding / Child Protection Policy - Safer Recruitment Procedures and Background Checks - Sound Accounting Practices 	<p><u>Safer Recruitment for:</u> All staff, teaching and non-teaching, working at The Homes: Selection procedures involve the receipt of applications in response to advertisement, shortlisting of candidates, a rigorous interview, demo lesson for teachers, and this is followed by error checking with the previous employer. All candidates are expected to provide two independent references.</p> <p>Police verification for both Teaching and Non-Teaching staff is carried out.</p>
<p><u>Children’s organised visits from the Homes</u> A clear policy has been in place for several years. The policy has worked very well thus far. This will be reviewed only if necessary. (Please see the school’s notes on this in right hand column).</p>	<p><u>Children’s organised visits from the Homes</u> Trustees of DGHUK to be made aware by The Homes of the general procedures that they follow for any offsite visits by children.</p>	<p><u>Children’s organised visits from the Homes</u> Children are always accompanied by teachers on organized educational visits, and a ratio of 1:15 adults to children is maintained.</p> <p>Town exeats are permitted once a month. Seniors are allowed out on their own under clearly laid out guidelines. Juniors are accompanied by cottage parents.</p> <p>For medical purposes visits to the District Hospital are undertaken in an official school vehicle with children being accompanied by our medical staff.</p>

<p><u>Communications, Social Media and Digital Technology:</u> It is strictly forbidden to take photographs of the children with personal staff mobile phones.</p> <p>Use of mobile phones: The school policy is that mobile phones are not permitted, except on Saturdays, Sundays and Holidays, between 1.00pm and 4.00pm. Outside of these hours, mobile phones are kept in the care of the cottage parents.</p>	<p><u>Communications, Social Media and Digital Technology:</u> DGHUK is committed to ensuring all communications about beneficiaries are undertaken with sensitivity in order to safeguard each person's right to dignity, privacy and confidentiality.</p> <p>DGHUK takes steps to prevent harm through communications, including social media and digital technology (using photographs/videos/audio clips, stories, articles, or any other communication materials) - See Appendix G</p> <p>Communication between sponsors/correspondents and pupils: - See Appendix D Correspondence between sponsors and pupils is overseen and supervised in the UK by the Sponsorship Secretaries in liaison with the Sponsorship Liaison Officer at The Homes. Direct communication between child and sponsor is not permitted in order to safeguard both parties.</p>	<p><u>Communications, Social Media and Digital Technology:</u> Staff at The Homes are not permitted to use their personal phones to take photographs of children.</p> <p>Use of mobile phones: The school policy is that mobile phones are not permitted, except on Saturdays, Sundays and Holidays, between 1.00pm and 4.00pm. Outside of these hours, mobile phones are kept in the care of the cottage parents.</p> <p>Communication between sponsors/correspondents and pupils: - See Appendix D Correspondence between sponsors and pupils is overseen and supervised by the Sponsorship Liaison Officer at The Homes in liaison with the DGHUK Sponsorship Secretaries. Direct communication between child and sponsor is not permitted in order to safeguard both parties.</p>
<p><u>Data Protection:</u> DGH follows a clear-cut policy of NOT sharing personal data of members of the BOM, staff, pupils and their families.</p> <p>Information on pupils is shared only with the direct parents of the child after proper verification, and that too only on a need-to-know basis.</p>	<p><u>Data Protection:</u> DGHUK is committed to protecting and respecting the privacy of everyone associated with the charity. Full details of how personal data is managed and used can be found in the charity's Privacy Policy which is on the DGHUK website.</p> <p>This Policy explains when and why personal information about people is collected, kept secure and used, and the conditions under which it may be disclosed to others.</p> <p>This complies with the UK General Data Protection Regulations 2018 (GDPR).</p>	<p><u>Data Protection:</u> All personal data is kept secure. Requests for staff, pupils & families records are routed through the Headmaster and Principal, who verify and release data on a need-to-know basis.</p>

3. RESPONDING, REPORTING & REVIEWING – Procedures & Action		
BOM	DGHUK	The Homes
<p>Allegations or suspicions of abuse: (see detailed definitions in Appendix A and DGH Safeguarding Document)</p> <p>At The Homes: If there are any allegations or suspicions of child abuse raised at The Homes the Principal is responsible for drawing the attention of the President of BOM and the Chairman of the DGH Safeguarding Committee as soon as such a case is reported to him. The Internal Complaints Committee, looks into complaints of abuse without any loss of time. Further action, such as appointing an external Enquiry Officer or registering the case with the police, including suspension of an accused adult employee, is taken by the BOM after studying the report of the ICC.</p> <p>All Safeguarding incidents are then reported immediately to the DGHUK Safeguarding Sub-committee by the Homes and / or the BOM.</p> <p>Board Members: If there are any issues, raised about Board Members they will be addressed quickly and effectively (e.g. bullying of a Board Member by another Board Member, or accusations or suspicions of child abuse by a Board Member).</p> <p>The President of the BOM is authorised to take appropriate action as deemed fit. If required, an enquiry committee will be set up and the same procedure followed as above.</p> <p>DGHUK will be informed by the President of the BOM if it involves a member of the Board in abusing other Board members as he deems fit.</p>	<p>Allegations or suspicions of abuse: (see detailed definitions in Appendix A, and also Appendix H - DGHUK protocol for managing disclosures)</p> <p>At The Homes or within the BOM: If DGHUK is informed of any allegations or suspicions of child abuse at The Homes or within the BOM, the Trustees will determine if / when it is appropriate to inform Police Scotland, Disclosure Scotland, OSCR and / or any other regulatory body. (For further information see: Office of the Scottish Charity Regulator (OSCR) Safeguarding Guidance (May 2018))</p> <p>Note: If there is a significant incident it should be reported to OSCR. This is not a legal requirement but OSCR will be concerned if it learns of a serious incident within the knowledge of the Trustees which has not been reported. In such cases the UK Committee should email 'notifiable@oscr.org.uk' with the following information:</p> <ul style="list-style-type: none"> - Describe what has happened and how it has (or may have) a serious impact on the charity. - Set out what action (if any) has been taken in response to the incident. - Set out what further plans the DGHUK have in place to deal with the incident. - Set out what else the DGHUK have done (or will do) to prevent or mitigate a similar problem in future. <p>UK trustees, staff and volunteers: If a Trustee, or anyone connected with DGHUK, is accused of abusing a child then procedures by the Trustees, as outlined above, will be followed. DGHUK will also inform the BOM and The Homes.</p> <p>Abuse of a Trustee by another Trustee such as bullying should be reported to the Chair of the Safeguarding Committee and the Chair of Trustees, who will then follow the DGHUK disciplinary procedures as noted in the Code of Conduct for Trustees, which is available from the DGHUK Secretary</p>	<p>Allegations or suspicions of abuse: (see detailed definitions in Appendix A and DGH Safeguarding Document)</p> <p>At The Homes: Lines of responsibility for dealing with allegations or suspicion of abuse are laid out in the DGH Safeguarding Document.</p> <p>The lead safeguarding officer will record the concerns in detail and use a body map to illustrate marks and bruises etc. (See Appendix B).</p> <p>Safeguarding incidents are reported immediately to the President and Chairperson of the DGH Safeguarding committee (BOM) first by phone and then in writing.</p> <p>All Safeguarding incidents are then reported immediately to the DGHUK Safeguarding Sub-committee by the Homes and / or the BOM.</p> <p>Lines of responsibility and procedures to deal with issues, raised about members of staff are laid out in the DGH Safeguarding Document.</p> <p>Incidents of abuse in The Homes are reported to the local police as and when required. (See DGH Safeguarding Document).</p>

<p>Review: Once each incident has been dealt with, DGHUK, The Homes and the BOM together will consider whether there are any learning points and whether this safeguarding policy could usefully be amended to help reduce the risk of a similar event in future, or to improve the response.</p>	<p>Recording: DGHUK will log all concerns raised or reported to it, together with a note of actions and recommendations taken.</p> <p>Review: Once each incident has been dealt with, DGHUK, The Homes and the BOM together will consider whether there are any learning points and whether this safeguarding policy could usefully be amended to help reduce the risk of a similar event in future, or to improve the response.</p> <p>..... <i>See also Appendix B: “How to Manage a Disclosure by a Child or Adult”.</i></p>	<p>Review: Once each incident has been dealt with, the DGHUK, The Homes and the BOM together will consider whether there are any learning points and whether this safeguarding policy could usefully be amended to help reduce the risk of a similar event in future, or to improve the response.</p>
<p><u>Missing Children:</u> If a child goes missing the BOM will be informed by the Principal only if the child is untraceable for more than six hours. The Principal has a set of procedures he follows locally before drawing the attention of the BOM.</p>	<p><u>Missing Children:</u> Trustees of DGHUK are aware of the general procedures that The Homes follow if a child goes missing.</p> <p>Chair of Safeguarding Committee and/or the Sponsorship Secretaries (SS) to be informed immediately should a child remain missing for 24 hours.</p> <p>Chair of Safeguarding Committee to inform DGHUK Trustees if a child goes missing at The Homes.</p>	<p><u>Missing Children:</u> In the case of missing children, the following steps are undertaken: Step 1 - A roll call is activated. Step 2 – The school security is activated. Step 3 – Parents are informed that the child is missing. Step 4 - Simultaneously a missing person report is registered at the Police Station.</p>
<p><u>Whistleblowing:</u> Any whistle-blower is offered strict confidentiality and every effort is made to protect him/her.</p>	<p><u>Whistleblowing:</u> Charity whistleblowing is an aspect of reporting in which trustees, employees or volunteers wish to draw the attention of their charity regulator, (in the case of DGHUK this is OSCR) to serious concerns about their charity.</p> <p>Any concerns by DGHUK trustees, employees or volunteers should be sent to OSCR, if a concern previously raised within the UK Committee has not been satisfactorily responded to. The information received by the charity regulator can help protect charities from financial loss, safeguarding risks, and other serious risks.</p>	<p><u>Whistleblowing:</u> Complete protection is offered to any whistle-blower and matters are dealt with the strictest confidentiality.</p>

CONFIRMATION OF ACCEPTANCE BY ALL PARTIES OF THIS JOINT SAFEGUARDING AND PROTECTING PEOPLE POLICY (2020)

BOM	DGHUK	The Homes
Signed by Chair of BOM:	Signed by Chair DGH of UK:	Signed by Principal of The Homes:
Date:	Date:	Date:
Signed by Safeguarding Lead Board Member:	Signed by a Safeguarding Trustee:	Signed by Safeguarding Lead Staff Member:
Date:	Date:	Date:

GLOSSARY

Committees

India:

- **Board of Management (BOM)** – Oversees Dr Graham’s Homes, Kalimpong. The BOM is headquartered in Kolkata but includes members based in West Bengal and abroad.
- **School Managing Committee (SMC)** - is based in Kalimpong and assists the BOM in managing the school. Its role is to overlook and prepare guidelines for the day-to-day activities at The Homes. It comprises 15 members: Five representatives of the Board of Management; four donors, benefactors persons interested in education nominated by the Board; Two Teachers' Representatives; One Employees' Representative; Two Guardians' Representatives and The Principal of The Homes (ex-officio).
- **DGH Safeguarding Committee** – BOM Committee whose role is to ensure that safeguarding policies for Dr Graham’s Homes are implemented and monitored correctly.
- **DGH Safeguarding Sub-committee and Internal Complaints Committee (ICC)** – are committees of the School Managing Committee. They comprise the same members, namely four teachers and an external member who is a person of good repute with earlier experience in Child Protection and safety matters. The committees are headed up by the Lead Safeguarding Officer at The Homes, currently Mrs Jeena Raghavan. The committees have two roles. In their safeguarding role, they look into issues regarding safeguarding at the Homes and carry out risk assessments. In their ICC role, they look into complaints of abuse without any loss of time.

UK:

- **Dr Graham's Homes Kalimpong (UK); (DGHUK)** – is the Scottish registered charity (SC050985, Registered Company: SC684452), supporting the sponsorship of children in Dr Graham’s Homes, Kalimpong.
- **UK Safeguarding Sub-committee** – is a sub-committee of DGHUK. It currently comprises three trustees and the Sponsorship Secretaries of DGHUK, one of whom is a trustee of DGH UK.

Internal Policies and Documents

- **Joint Safeguarding and Protecting People Policy (2020)** (known as ‘**Joint SPP Policy 2020**’) – this document, which is used by all parties.
- **Dr. Graham’s Homes Child Protection and Safeguarding Policy, 2020** (Known as ‘**DGH Safeguarding Document**’) - is a document developed by the BOM and The Homes. It is based in part on the advice given in this document (**Joint SPP Policy 2020**), but also follows the best practices in schools in India and includes provisions of Indian Law, keeping the local situation in mind.

APPENDIX A

Definitions and Signs of Abuse

<p>Abuse: A form of maltreatment of a person/s.</p> <ul style="list-style-type: none"> - Somebody may abuse or neglect an adult or child by inflicting harm, or by failing to act to prevent harm <p>Note: Corporal punishment could be regarded as physical punishment, mental harassment and/or discrimination</p>	
<p>There are four main types of child abuse as defined under the UK Government Guidance 'Working Together to Safeguard Children' 2018:</p>	
Physical abuse	<p>A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a beneficiary.</p> <p><i>Signs/Indicators of Physical Abuse:</i></p> <ul style="list-style-type: none"> • frequent injuries • unexplained or unusual fractures or broken bones • unexplained: bruises or cuts; burns or scalds; bite marks • fear of a specific individual • flinching • hinting at secrets • nervous behaviour or sudden behaviour changes • self-harm <p>Physical harm may also be caused when a parent, primary caregiver or guardian fabricates the symptoms of, or deliberately induces, illness in a beneficiary.</p>
Emotional abuse	<p>The persistent emotional maltreatment of another such as to cause severe and persistent adverse effects on their emotional development and stability.</p> <ul style="list-style-type: none"> • It may involve conveying to another person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. • It may include not giving another person opportunity 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 others. These may include interactions that are beyond their developmental capability, as well as overprotection and limitation of exploration and learning, or preventing that person from participating in normal social interaction. • It may involve seeing or hearing the ill-treatment of another. • It may involve serious bullying (including cyber bullying or sexting), causing others frequently to feel frightened or in danger, or resulting in exploitation or corruption. This may include: <ul style="list-style-type: none"> ○ Intimidation ○ Making hurtful remarks about someone's appearance or performance ○ Isolating someone from others ○ Excluding someone from activities <p>Some level of emotional abuse is involved in all types of maltreatment of another, though it may occur alone.</p> <p><i>Signs/Indicators of Emotional Abuse:</i></p> <ul style="list-style-type: none"> • aggressive behaviour • self-harm, including eating disorders and suicide • fear of a specific individual • fear of making mistakes • lack of confidence • lack of friends • sudden behaviour changes

Sexual abuse	<p>Forcing or enticing someone to take part in sexual activities whether, or not, they are aware of what is happening.</p> <p>The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.</p> <p>They may also include non-contact activities, such as involving others in looking at, or in the production of, sexual images, watching sexual activities, encouraging them to behave in sexually inappropriate ways, or grooming someone in preparation for abuse (including via the internet).</p> <p>Sending or posting inappropriate content, including:</p> <ul style="list-style-type: none"> • descriptions of sexual acts, • images of a sexual nature • images of violence or jeopardy • any other content that might upset the other person <p>Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can children.</p> <p><i>Signs/Indicators of Sexual Abuse:</i></p> <ul style="list-style-type: none"> • <i>fear of a specific individual</i> • <i>hinting at secrets</i> • <i>lack of confidence</i> • <i>lack of friends</i> • <i>nervous behaviour</i> • <i>self-harm</i> • <i>sexualised language</i> • <i>sudden behaviour changes</i> • <i>unexplained gifts</i>
Neglect	<p>The persistent failure to meet someone’s basic physical and/or psychological needs, likely to result in the serious impairment of their health or development.</p> <p>Neglect may involve a parent, a primary caregiver, or a guardian failing to:</p> <ul style="list-style-type: none"> • provide adequate food, clothing and shelter (including exclusion from home or abandonment) • protect another person or child from physical and emotional harm or danger • ensure adequate supervision (including the use of inadequate caregivers) • ensure access to appropriate medical care or treatment. <p>It may also include neglect of, or unresponsiveness to, someone else’s basic emotional needs.</p> <p><i>Signs/Indicators of Neglect:</i></p> <ul style="list-style-type: none"> • <i>frequently dirty</i> • <i>inappropriate clothing for the weather</i> • <i>hostile or aggressive behaviour</i> • <i>lack of confidence</i> • <i>lack of friends</i> • <i>nervous behaviour</i> • <i>poor weight gain or obesity</i> • <i>poor dental care</i> • <i>particularly quiet or withdrawn</i> • <i>sudden behaviour changes</i> • <i>poor school attendance</i>

APPENDIX B

How to Manage a Disclosure made by a Child or Adult

The person to whom a child/adult makes a disclosure of some form of abuse:

- should:

- Listen carefully rather than question them directly.
- Stay calm and not offer their personal opinions/thoughts.
- Tell them that they are being listened to and that they are being taken extremely seriously.
- Seek medical attention if necessary.

- should not:

- Offer to keep confidential any information disclosed. Instead, make them aware that there may be occasions where they have to pass the information to another adult or to the police.
- Make any promises.
- Interrogate them – it is not the listener's job to carry out an investigation.
- Make suggestions or 'put words into their mouth'.
- Cast doubt on what they have said.
- Interrupt or change the subject.
- Say anything that makes them feel responsible for the abuse.

Following the disclosure (once the abused child/adult is safe and being cared for):

- As soon as possible, inform the Lead Safeguarding person at The Homes of the incident, or another senior member of staff if this person is not available. They will know how to follow this up and where to go for further advice.
- The 'Reporting Safeguarding Concern' form, which includes a body map for recording any injuries seen, (samples attached) should be completed by the person to whom the disclosure has been made and then passed to the Lead Safeguarding Person.

When completing the form, the person to whom the disclosure was made should:

- Write down everything said (in their own words as far as possible) – accuracy and detail is important. Keep this information stored in a secure place.
- Write down all actions taken as a result of the disclosure.
- Note and record any injuries seen on a body map which will be supplied by The Homes (attached).

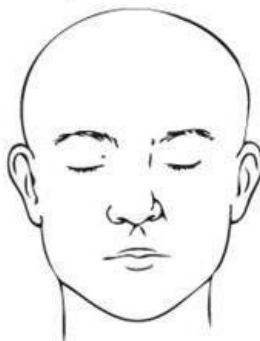
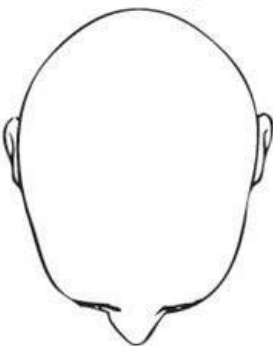
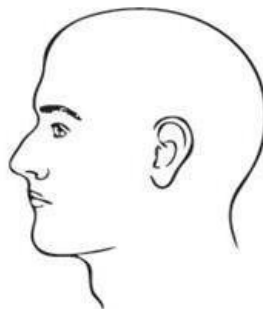
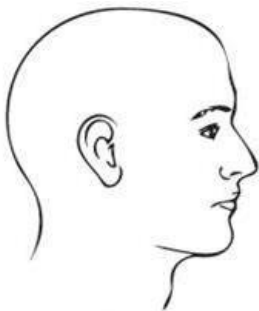
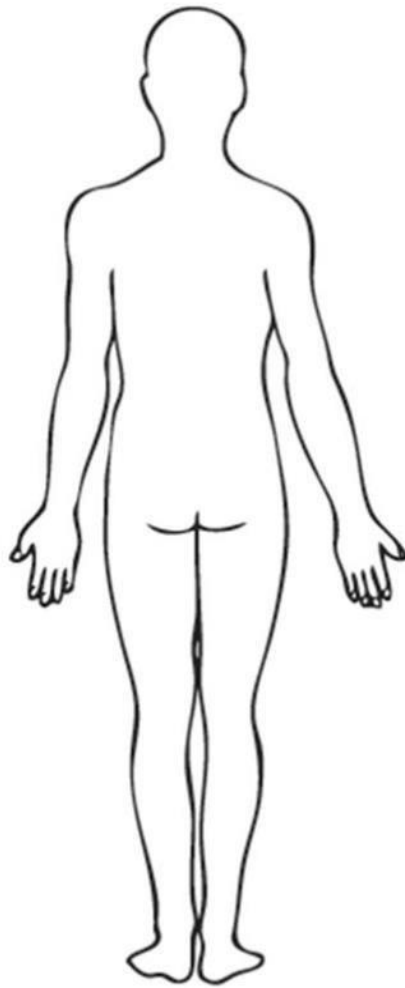
Dr Graham's Homes, Kalimpong, India

Reporting Safeguarding Concern Form

Please write clearly:

1. Name of person who reported the incident	Name: Position:
2. Name of person who is now recording the incident <i>(if different from #1 above)</i>	Name: Position:
3. Dates and times:	Incident: Date: _____ Time: _____ Report given: Date: _____ Time: _____ Record completed: Date: _____ Time: _____
4. Name of child who has allegedly been abused, class and date of birth:	Name: _____ Class: _____ Date of birth: _____
5. Where and how did the disclosure take place? <i>Accuracy and detail are important.</i>	Where: _____ How (please give a full description and write overleaf if needed): _____
6. Name of anyone else who witnessed the incident?	Name: _____
7. Name(s) of those accused:	Name(s): _____
8. Actions taken as a result of the disclosure <i>Accuracy and detail are important.</i>	Please give a full description and continue overleaf if needed: _____
9. Please complete the body map	
Signed by:	
Person who reported the incident:	Date: _____ Time: _____
Person who completed this form:	Date: _____ Time: _____
Member of Safeguarding Committee to whom the incident was reported:	Date: _____ Time: _____

DGH Safeguarding Body Map



Child's Name:

Date of Birth:

Adult Name: who witnessed the injuries

Date & time injuries seen:

Date & time info recorded:

Details of injuries/location on body:

Signed/Name Safeguarding Lead / Date:

Actions by Safeguarding Committee:



APPENDIX C

Guidance for Visitors to Dr Graham's Homes (The Homes)

Visits to The Homes are welcomed, however there are specific procedures to be followed before such visits take place.

Applying to visit:

1. In the interests of safeguarding, any DGHUK sponsor or correspondent wishing to visit their supported child should in the first instance contact the Sponsorship Secretaries of DGHUK. All contact details can be found on the Visitor Enquiry Form.

- a. A **Visitor Enquiry Form** (attached) should be completed by each person involved in the visit and returned to the DGHUK Sponsorship Secretaries.
- b. The Sponsorship Secretaries will then forward the completed enquiry form to The Homes, after which all further communication should be made directly with the School Principal or his delegated representative.

2. Sufficient time is needed in order to liaise with the Principal, the Headmaster and the senior management team, so that proper and effective arrangements are put in place to provide a welcome to visitors, while at the same time minimising disruption to the daily life on campus of pupils, whose education, welfare and safety is paramount at all times.

3. **For longer visits of four days or more**, disclosure checks may be required. This will involve the individual applying for and exhibiting a disclosure certificate or criminal record check, or similar.

Note: To allow sufficient time for this, a minimum of three months should be allowed before the expected travel date in order for this process to be completed.

Disclosure Checks: There are different options, depending on the residential location of the individual.

- Scotland (<https://www.mygov.scot/disclosure-types/>)
- England and Wales (<https://www.gov.uk/request-copy-criminal-record>)
- Northern Ireland (<https://www.nidirect.gov.uk/campaigns/accessni-criminal-record-checks>)

4. **Anyone wishing to visit The Homes who is not sponsoring or corresponding with a child through DGHUK should make direct contact with the School Principal. Contact details can be obtained from the DGHUK Sponsorship Secretaries.**

When at The Homes:

On arrival at the Homes, all visitors should report to the main office, where they will be given a visitor's badge and will be introduced to the member(s) of staff who will be escorting them throughout their visit.

- a. **Even where a visit is approved by The Homes, the school administration and the party leader / individual must ensure there is no 1:1 contact between any visitor and a child, except in the presence of a member of staff from the school.**
- b. If visitors are part of a group, the party leader must ensure that members of the party fully comply at all times with any guidance or requirements that are made known by an official and/or senior representative of the management team at the Homes, whenever they are on campus.
- c. If a sponsor or correspondent of a child wishes to visit the cottage in which their supported child lives, then the link staff member from the Homes should be informed so that a properly supervised visit can be arranged at the convenience of the cottage parents and the sponsored child.
- d. **Before taking photographs or videos** of any individual child an explanation should be given explaining how the photograph/video will be used, and permission must be granted by the child. If the child is under 7 years of age, then permission should be sought from the child's main carer or the member of staff accompanying the visitor. For group photographs, permission must be sought from the responsible adult.

- e. **Please note this extract from the DGHUK Communications, Social Media and Digital Technology Policy (Appendix G).**
DGHUK takes the following steps to prevent harm through communications, including social media and digital technology (using photographs/videos/audio clips, stories, articles, or any other communication materials):
- i. *Material posted on social media or digital technology will not contain the family name, The Homes admission number, or personal location/address of children if different from that of The Homes.*
 - ii. *Material about any child will not be geo-tagged to precise locations if it contains any part of their name or other identifying information.*
 - iii. *Personal information about anyone connected with Dr Graham's Homes that is captured, stored or sent through electronic, on-line or mobile devices is password protected.*

f. If a safeguarding disclosure is made to an individual by a child or adult,

They should:

- Listen carefully rather than question them directly.
- Stay calm and not offer their personal opinions/thoughts.
- Tell them that they are being listened to and that they are being taken extremely seriously.
- Seek medical attention if necessary.

They should not:

- Offer to keep confidential any information disclosed. Instead, make them aware that there may be occasions where they have to pass the information to another adult or to the police.
- Make any promises.
- Interrogate them – it is not the listener's job to carry out an investigation.
- Make suggestions or 'put words into his or her mouth'.
- Cast doubt on what they have said.
- Interrupt or change the subject.
- Say anything that makes the pupil feel responsible for the abuse.

After listening, the individual should report the disclosure to the school authorities / Lead Safeguarding Officer.



Visitor Enquiry Information Form

We are delighted that you would like to visit Dr Graham's Homes in Kalimpong. In the interests of safeguarding, it would be helpful to know something about you and your planned visit. Please would you complete and return the form below either directly to the Principal or Sponsorship Liaison Officer at The Homes, or in the case of DGHUK sponsors or correspondents, to the DGHUK Sponsorship Secretaries who will then forward it to The Homes. From this point on, all communication will be made directly with the Principal or his delegated representative.

Please note that for reasons of safeguarding, if you visit Dr Graham's Homes, DGHUK will keep your information on file for the period of time specified in our Privacy Policy.

For full details of how we manage and use your personal data please see our [Privacy Policy](https://drgrahamshomes.co.uk/privacy-policy) which can be found on our website (drgrahamshomes.co.uk). If in the future you wish to view or change the data we hold about you, change your mailing preferences, or have the data we hold about you deleted, please contact us in writing or by email (see below).

Please note, if more than one person is visiting The Homes, each individual visitor is required to complete a form.

Title:	Forename:	Surname:	
Address:		Post / Zip Code:	
		Country:	
Email address (required):		Telephone (required):	
Do you sponsor or correspond with a child in The Homes? Yes / No			
If so, please enter the child's/children's name(s)			
What is the main purpose of your planned visit?			
If you expect to be part of a group or tour party visiting The Homes, please enter the name of that group here:			
Expected date of arrival at The Homes, Kalimpong:			
Expected date of departure from The Homes, Kalimpong:			
I wish to continue to receive information about DGH in the future:		YES	NO
Signature:		Date:	

Dr Graham's Homes contact details:

Principal: +91 99339 99270 neilconrad69@gmail.com
 Headmaster: +91 94343 08822
 Secretary School Management Committee: +91 98147 13614

Ian & Anji Russell
 DGHUK SPONSORSHIP SECRETARIES
 Hazelgrove, The Common, Cranleigh, GU6 8NS, UK
 Tel: 01483 272108
sponsorship@drgrahamshomes.co.uk

APPENDIX D

DGHUK Guidance for Communication between Sponsors, Correspondents and Pupils

The following guidance is given so that we can ensure the safeguarding, not only of the pupils, but also that of sponsors and correspondents.

Introductions

As soon as a sponsor is linked with a pupil, introductory letters or e-mails and photographs are usually exchanged and this sees the start of a correspondence that ideally continues throughout the sponsorship period.

Cards, letters, emails and/or photographs can be exchanged, along with updates on what is happening in and out of school.

Correspondence - letters

If a letter is written by the sponsor or correspondent, they can post it themselves directly to the Homes where it will be read by the Sponsorship Officer before being passed on to the pupil.

The pupil will then be encouraged to reply, and these letters will be given to the Sponsorship Officer in Kalimpong, who will forward them to the Sponsorship Secretaries in the UK. Usually, these letters are scanned and attached to an email. The Sponsorship Secretaries will then forward them to the sponsor or correspondent.

Correspondence - emails

If an email is written by the sponsor or correspondent, it is sent to the Sponsorship Secretaries in the UK. They read, and then convert the letter to a PDF, ensuring that the sponsor / correspondent's email address is removed. This is then emailed as an attachment to the Sponsorship Officer at the Homes, who prints the letter for the pupil and encourages a reply. This is sent, usually by email, via the Sponsorship Secretaries in the UK.

Content of correspondence

Please note: All correspondence between pupils and sponsors/correspondents will be read by the UK Sponsorship Secretaries and/or by The Homes Sponsorship Liaison Officer.

Note: we do not permit direct communication by any means between sponsors/correspondents and school-age children. This is to safeguard both parties.

Please keep to the following guidelines when contacting pupils at The Homes:

- 1. Please do not give your personal contact details.*
- 2. Please do not make any reference to money.*
- 3. Please do not put any information on any form of social media unless you have permission (preferably written) from the pupil, or their carer, at The Homes. If photographs are put on social media, do not add the pupil's name, admission number or any identifying information.
(Please see [Appendix G](#) - DGHUK Communications, Social Media and Digital Technology policy)*
- 4. If you wish to visit The Homes, please read [Appendix C](#) - Guidance for individual visitors to The Homes.*

APPENDIX E

DGHUK Guidance for Fundraising

*'Fundraising is a key contact between charities and the public.
Get it right, and your charity secures funding and public goodwill.
Get it wrong, and you risk undermining the public's confidence in your charity and the wider sector.'*
[OSCR - Fundraising guidance for charity trustees.](#)

DGHUK Trustee Responsible for Fundraising: (to be confirmed)

Fundraising is a core activity of DGHUK.

Trustees are committed to ensuring that all fundraising activities are carried out sensitively and with due regard to the safety and wellbeing of everyone involved – trustees, staff members, volunteers, beneficiaries and any other participants.

Safeguarding the right to dignity, privacy and confidentiality for all our supported children and their families is of the utmost importance. Everyone involved has the responsibility to ensure that all beneficiaries are treated and portrayed with dignity, and not as helpless victims.

See also:

- **Appendix G - DGHUK Communications, Social Media and Digital Technology Policy**
- **Currently DGHUK PRP Section 5** entitled 'Fundraising' (Page 23) Available from the DGHUK Secretary
- **OSCR Fundraising Guidance for Charity Trustees:** [Fundraising Guidance for Charity Trustees](#)

APPENDIX F

DGHUK Electronic Communication Policy

e.g. Email, WhatsApp, Text, Instant Messaging, Social Media, etc.

Overview

The good reputation of the UK Committee Dr Graham's Homes, Kalimpong, India (DGHUK) must be protected.

Relationships between members of the Board of Trustees of DGHUK and with others associated with DGHUK, such as supporters, donors and partners in India, must also be protected in order to ensure the smooth and effective running of the organisation.

This policy should be read in conjunction with the **Constitution** and the **Code of Conduct for Trustees** of DGHUK. All Trustees, Office Bearers, Employees and Contractors of DGHUK are expected to comply with these policies and procedures.

Appropriate Use of Email and Other Means of Electronic Communication

Electronic communication, especially email, is a critical mechanism for communication within DGHUK. It therefore must be used with respect and in accordance with the goals, aims and ethos of DGHUK.

The objectives of this policy are to outline appropriate and inappropriate use of electronic communication in order to minimise misunderstandings, disruptions to services and activities, as well as to comply with applicable policies and laws.

General Expectations of Users

Important communications within DGHUK are usually delivered via email. As a result, trustees and employees of DGHUK are asked to check their email account regularly.

When using electronic means of communication such as email, WhatsApp, text, social media, etc, all users are expected to comply with normal standards of professional and personal courtesy and conduct.

Any communications concerning the charity from DGHUK Trustees, Office Bearers, to Dr. Graham's Homes' Board of Management in Kolkata, India, or to the staff at Dr. Graham's Homes in Kalimpong, India, must be specifically authorised by the Charity's Chairman.

Electronic communication must be respectful at all times and must not be used in any way that might be interpreted by others as insulting, disruptive, offensive, or harmful to morale. Examples of forbidden transmissions include sexually explicit messages, cartoons, or jokes; ethnic or racial slurs; or any other message that can be construed to be harassment or disparagement of others based on their sex, race, sexual orientation, age, national origin, religious beliefs, or other personal characteristics or circumstances.

Appropriate Use

Individuals at DGH are encouraged to use electronic communications to further the goals and objectives of DGH. The types of activities that are encouraged include:

- Communicating with fellow trustees, donors, supporters, business partners and associates of DGHUK
- Acquiring or sharing information necessary or related to the work and activities of DGHUK

Inappropriate Use

The use of electronic communication within DGHUK will comply with all applicable laws and all DGHUK policies. The following activities are deemed inappropriate:

- Use of electronic communication for illegal or unlawful purposes, including copyright infringement, obscenity, libel, slander, fraud, defamation, plagiarism, harassment, intimidation, forgery, impersonation and computer tampering (e.g. spreading of computer viruses).
- Use of electronic communication in any way that violates DGHUK's policies, rules, or administrative orders.
- Opening email attachments from unknown or unsigned sources. (Attachments are the primary source of computer viruses and should be treated with utmost caution.)
- Overburdening recipients with large numbers of messages in quick succession, or by placing unreasonable expectations upon response times.

Monitoring and Confidentiality

The email services provided by DGHUK (i.e. those email addresses ending in @drgrahamshomes.co.uk) are owned by the organisation and are therefore its property. This gives DGHUK the right and responsibility to monitor any and all email traffic passing through its email system.

In addition, backup copies of email messages may exist, despite end-user deletion, in compliance with DGHUK's records retention policy. The goals of these backup and archiving procedures are to ensure system reliability, to prevent data loss and to comply with GDPR regulations.

If the Chairman and/or Vice-Chairman discovers, or has good reason to suspect, activities that do not comply with applicable laws or this policy, DGHUK email records may be retrieved and used to document the activity in accordance with due process.

Caution

- Use extreme caution when communicating confidential or sensitive information via email or by other electronic means.
- Keep in mind that all sent messages become the property of the receiver.
- A good rule is not to communicate anything that you wouldn't feel comfortable being made public.
- Demonstrate particular care when using the "Reply" or "Reply-all" commands during email correspondence.
- Always check that the reply message does not contain other emails that might have been part of an earlier conversation which would be inappropriate for the recipient to see.

Failure to Comply

Violations of this policy may result in disciplinary action as outlined in the Code of Conduct for Trustees or any relevant Employment or Contractual Agreement.

APPENDIX G

DGHUK Communications, Social Media and Digital Technology Policy

1. In order to safeguard the right to dignity, privacy and confidentiality for all our supported children and their families, DGHUK is committed to ensuring that all communications about them are undertaken sensitively and with due care. We will ensure that all our beneficiaries are treated and portrayed with dignity and not as helpless victims.
2. DGHUK staff, Trustees and other personnel (e.g. web developer, videographer, photographer etc) must obtain permission from the child, where the subject is a child and they are the primary subjects of a story, photo and/or video resource gathering.
3. DGHUK takes the following steps to prevent harm through communications, including social media and digital technology (using photographs/videos/audio clips, stories, articles, or any other communication materials):
 - i. Material posted on social media or digital technology will not contain the family name, the Homes' admission number, or personal location/address of children if different from that of The Homes.
 - ii. Material about any child will not be geo-tagged to precise locations if it contains any part of their name or other identifying information.
 - iii. Personal information about anyone connected with Dr Graham's Homes that is captured, stored or sent through electronic, on-line or mobile devices is password protected.

DGH Communications should, at all times, be carried out in a manner that keeps the safety of everyone connected with Dr Graham's Homes as the top priority.

APPENDIX H

DGHUK Protocol and Procedures for Managing a Safeguarding Disclosure Concerning a Child at the Homes

1. DGHUK Lead Safeguarding Persons:

Chair of Safeguarding Sub-Committee:

Peter Cook (safeguarding@drgrahamshomes.co.uk)

Sponsorship Secretaries:

Ian & Anji Russell (sponsorship@drgrahamshomes.co.uk)

2. DGHUK Single points of contact:

In order to manage communications between DGHUK, the Homes and the BOM, about any safeguarding event, these persons are designated as the DGHUK single points of contact.

Note: these roles may be delegated to others at the discretion of the designated person

- | | | |
|---|-----|------------------------------|
| • Chair of DGHUK | <-> | Chair / President of the BOM |
| • Chair of DGHUK Safeguarding Committee | <-> | BOM Lead Safeguarding Person |
| • DGHUK Sponsorship Secretaries | <-> | DGH School Principal |

3. Upon receiving a report of a possible safeguarding incident, concerning a child at the Homes, the following protocols and procedures will be followed:

- a. Any person receiving a report of such an incident will immediately inform the DGHUK Lead Safeguarding Persons (See #1. above.)
- b. The DGHUK Lead Safeguarding Persons will consult with each other and agree a strategy for investigating the report.
- c. The DGHUK Safeguarding Committee Chair will inform the DGHUK Safeguarding Committee members that there has been a possible safeguarding incident and that it will be investigated.
- d. One of the DGHUK Safeguarding Leads will start keeping a detailed and dated, confidential log of all communications regarding the incident. This log is for accountability purposes only and will only be opened if a formal request is received from an official third party such as OSCR, or from the Chair of DGHUK. The log will contain names of the persons involved, but these names will be redacted if a copy of the log is shown to others.
- e. The DGHUK Safeguarding Committee Chair will make enquiries of the BOM Lead Safeguarding Person, and the DGHUK Sponsorship Secretaries will make enquiries of the Homes School Principal.
- f. The BOM and the Homes' Lead Safeguarding Persons will fully investigate the alleged incident and report back to the DGHUK Safeguarding Leads as soon as the investigation is complete.
- g. The DGHUK Lead Safeguarding Persons will keep the DGHUK Safeguarding Committee informed of the progress of the investigation.
- h. If the investigation suggests that the reported incident may be judged to be a safeguarding matter, the Chair of DGHUK Safeguarding Committee will call a meeting of the DGHUK Safeguarding Committee. A decision will then be taken as to whether the matter should be escalated to the full DGHUK Board of Trustees to decide whether or not OSCR or Police Scotland should be informed.
- i. Any written reports of incidents provided to the DGHUK Safeguarding Committee, or to the DGHUK Board, will remain strictly confidential, and will normally have victim and perpetrator names redacted for the sake of privacy.
- j. These protocols and procedures will be reviewed after an incident has been closed.