

## Safeguarding Standards Policy

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### Definitions

1. In this Policy, the following words and phrases shall have the meaning set out below.

<b>NCA</b>	means UWC (United World Colleges) National Committee of Russia. The main goals of the NCA are to represent the UWC movement in Russia, to maintain ties with alumni of UWC schools and colleges, and to select and nominate candidates for UWC educational programs.
<b>Abuse</b>	means all forms of action or inaction which can result in harm for a Student. The types of Abuse are set out in detail in Annex 1 to this document.
<b>DSL</b>	means a person who fulfils the role of a Designated Safeguarding Lead in NCA. A DSL has oversight and responsibility for ensuring that policies and procedures are in place and operate in practice and is the first contact point in the event of a referral.
<b>DDSL</b>	means a Deputy Designated Safeguarding Lead, who is the person who fills the role of DSL if in any particular instance the DSL is not available.
<b>Nominated Individual</b>	means the person appointed within the NCA who is part of the governing body of the NCA and who shall have oversight into any Abuse concerns.
<b>Student</b>	means a person attending a UWC School/ College for a period of study. It also includes, for the purposes of this document, all applicants for places at UWC Schools/Colleges, and participants or applicants for places at any UWC Short Course organised by NCA.
<b>UWC International</b>	means UWC International, the company limited by guarantee, which is a registered charity in the England and Wales under the name “The United World Colleges (International) Ltd”.
<b>UWC Movement</b>	means United World College Movement.

### Safeguarding Paperwork

2. All safeguarding paperwork will be kept under review regularly and systematically.
3. Safeguarding paperwork is in compliance with the laws of the Russian Federation.
4. NCA should document its activities and decisions made in the selection process. NCA should also document its facilitators and participants and update their records regularly.

## Safeguarding Culture

5. NCA ensures that its policies and procedures are applied in practice and understood and followed by all involved in the NCA, including governing bodies, administrative staff, interns, and volunteers and, as far as is age-appropriate and achievable, all the Students.

## Preventative Actions

6. NCA should make its members and volunteers aware of safeguarding needs and responsibilities. Safeguarding should be built into trainings, briefings and onboarding for new joiners and selectors.
7. DSL of the NCA is the project manager of the NCA, who has overall responsibility for ensuring that paperwork is kept up to date and under review and is the point of contact for any who are subject to or fear Abuse, are concerned that Abuse may be occurring in respect of others. If in any particular instance the DSL is not available, then the DDSL will be the person filling the role of DSL.
8. Nominated Individual and the DDSL of the NCA is the director of the NCA.
9. NCA should review the recruitment process for their members, particularly those who engage directly with candidates or participants in higher risk activities. This includes asking for references - e.g. from colleges for recent graduates or staff - and/or police records, where these are available in national systems.
10. NCA will take all reasonable steps to make sure that all those who have regular unsupervised contact with Students within the NCA are instructed to ensure they understand the nature and risks of Abuse.
11. Having a sensitive, up to date, and clear code of behavior is one of the priorities within the Policy. This is to minimize the opportunities for all in contact with Students to perpetrate Abuse or to be subject to accusations of Abuse perpetration.
12. NCA will take all reasonable actions to make NCA's commitment to safeguarding known publicly.
13. NCA should take all reasonable and practical steps to ensure that any building or premises of the NCA or used by the NCA is organized in a manner that provides appropriate and reasonable security for any Student involved without losing the essential freedoms valued by the UWC Movement.
14. NCA ensures that all involved with the NCA, including Students, will be informed of what to do if they feel uncomfortable or have concerns about Abuse or possible Abuse.
15. NCA will apply appropriate routines for visitors and any others who work with the NCA to minimize the risk of Abuse and to avoid, to the extent reasonable, that they spend any significant time alone with Students where they cannot be overseen.
16. When reviewing its alignment with safeguarding requirements, NCA should also consider drafting clear job descriptions for the different roles on its team.
17. Every facilitator should sign a respective code of conduct or other document including code of conduct before the beginning of the respective activities within the NCA.
18. NCA activities such as selections and short programs should be categorized in terms of the risk level involved. The goal of the risk assessment is to identify potential risks to candidates/participants in all areas of national committee work and surrounding short programs as well as selection visits in order to mitigate these risks. The safeguarding requirements will increase gradually depending on the risk level. The Risk Assessment Form provided under ANNEX 2 of this document might be helpful for evaluating the risk level.
19. The following general requirements apply to all activities and events. For low-risk activities such as activities or events that take place during the day only, there are no additional requirements.
  - NCA will take all reasonable actions to ensure that each selection event or short course has an adequate number of facilitators of different genders;

- A facilitator should avoid being alone with a participant in a place where they are not visible to other facilitators or participants;
  - Facilitators involved in an activity where they are directly engaging with participants need to receive a safeguarding briefing/instruction or training;
  - Familiarity with the emergency/serious incident procedure;
  - Reporting of any safeguarding incidents to DSL and to UWC International in cases of more serious incidents that could have reputational implications;
  - Organizers should consider additional support e.g. social worker, psychologist.
20. Additional precautionous measures should be taken in cases of Moderate and/or High-risk activities, which include activities and events with overnight stays or overnight stays in small groups with only one facilitator.

### The Identification of Abuse or Potential Abuse

21. NCA will instruct its staff , volunteers, other invited specialists so that:
- a. they understand the nature of Abuse and the indicators of possible Abuse taking place;
  - b. they know how to respond to a Student who informs them of Abuse or of suspected or potential Abuse; and
  - c. they understand that all matters of Abuse or of suspected or potential Abuse must be brought to the attention of the DSL and that the DSL should be consulted even if they are unsure as to whether a matter has to be reported.
22. NCA will undertake the inclusion of training in learning for all those who have connections with the NCA in circumstances where it is possible that they might be subject to Abuse, so that they are:
- a. aware of the nature of abuse; and
  - b. aware of who they should talk to in the event of their feeling uncomfortable as a result of any actions or inactions taken by someone involved with the NCA.

### Action in Connection with Abuse and Suspected or Potential Abuse

23. NCA will promptly act to address any risk, even if unproven at that stage, on the basis of the precautionary principle, to keep the Student potentially concerned or any other Students, other children or young people safe. This may involve the suspension or removal of any person about whom concerns have been raised. Safety is priority for the NCA. Considering that such actions may impact severely on those who may or may not be involved, NCA will undertake investigation and resolution so that the issue can be resolved fairly and with all due speed.
24. NCA will also undertake actions in accordance with the applicable laws of the Russian Federation.
25. NCA will remove any person who, after due investigation, is identified as a perpetrator of Abuse from a position where they can harm any Student. Subsequently, NCA will undertake all reasonable steps to avoid the individual concerned continuing to be a risk to Students or children in the future either at the NCA or beyond.
26. In the event that the perpetrator or alleged or potential perpetrator is a Student, the NCA will undertake all reasonable actions to ensure that they do not constitute a further risk to other Students involved with the NCA. Such a Student should be dealt with according to the disciplinary code(s) and/or other procedures of the NCA.
27. NCA will notify the International Office of any severe safeguarding incident which, if established as true, should result in disciplinary action against a staff member, or expulsion of a Student, or

criminal action against a person who is neither staff nor a Student. NCA expects that the notifications received will be treated confidentially unless they have entered the public domain without breach of confidentiality or as otherwise agreed with the parties concerned.

28. Considering that under this Safeguarding Standards, “abuse” is defined as any activity (verbal, physical, through images, text or gestures) of an intimate or sexual nature without full and valid consent of the counterpart, selection volunteers and short course organisers or facilitators - just like any staff at a UWC school or college - cannot obtain such valid consent from a candidate or participant due to their position of authority and the resulting power differential. Therefore, any activity of the above nature with them constitutes “abuse” and cannot be tolerated.

## ANNEX 1

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### NCA Definition of Abuse

The major categories of Abuse are:

- a. **Physical Abuse:** any physical action which can result in injury (including emotional injury) to a Student;
- b. **Emotional abuse:** any action or series of actions (generally understood as ill-treatment) which cause or is likely to cause severe and persistent effects on the Student's emotional development;
- c. **Sexual Abuse:** forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. 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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

All of the above may include, but not limited to, physical or non-contact activities, such as inappropriate communications, involving Students/children in looking at or producing pornography or inappropriate displays of nudity. These contacts or interactions may be carried out against the Student/child using force, trickery, bribes, threats or pressure. Actions will be Abusive even if the Student/child appears to consent if that consent is not valid because of the age of the victim or the effect of alcohol or drugs.

- d. **Abuse by Neglect** is the persistent failure to meet the Student's basic physical and/ or psychological needs, likely to result in the serious impairment of the Student's physical or cognitive development.

**Abuse and Students over the age of consent.** It is made clear that actions by staff members or other UWC Movement adult non-Students, which would be considered abusive to a Student under the age of consent (within any jurisdiction) are, for the purposes of UWC, to be considered Abusive even if the Student is over the age of consent and maintains that that consent was freely given. The reason for this is the position of trust and the unequal balance of power of staff members and others within the UWC Movement and Students.