



## **Safeguarding Policy/Child Protection Policy**

**Date Approval** : 1 April 2022  
**Review Cycle** : 12 months  
**Ownership** : Campus Principal

**Next Review** : April 2023  
**Scope** : Whole School  
**Approved by** : SLT

### **1) Aims**

Asia Pacific School (APS) expects that all staff and volunteers in our schools and any contractors or partner agency staff used by schools, recognise where a student is at risk of, or is actually being harmed and do all they can to reduce further risk or harm.

We recognise that our schools are particularly important in protecting our students; they are in the best position to identify concerns early and provide or identify help for students as well as helping to prevent these concerns from escalating. APS adheres to these basic principles:

- A child's welfare is paramount and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender or culture.
- All students need to be safe and feel safe in school.
- Every student is entitled to a rich and broad curriculum that helps to equip them to keep themselves safe.
- Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
- We work in partnership with parents/carers and/or other professionals to ensure the protection of students.
- Our guiding principle throughout is 'the best interests of the students'.
- All students have the same equal rights to protection, but we recognise that we need to do more for some because of their special educational needs, disability, gender, religion or sexual orientation.

### **2) Responsibility**

The Senior Management Team recognise their ultimate responsibility to ensure that Asia Pacific Schools understand and follow the guidance provided by this and all other safeguarding related documents.

#### **Principals and Senior Management Teams in Schools**

The Principals and Senior Management Team in each school will:

- Ensure that the Safeguarding application notes and safeguarding policy are implemented across the school and followed by all staff and volunteers.
- Allocate sufficient time and resources to enable the Designated Safeguarding Lead (DSL) and any deputy Designated Safeguarding Lead to carry out his/her role effectively.
- Ensure that the culture of the school facilitates concerns being raised and handled sensitively.
- Ensure that safeguarding is addressed through the curriculum.
- Ensure the school site is secure.
- Customise this policy for their particular school.
- Ensure that local mapping of legislation, guidance and supportive agencies is undertaken and added to the school's customised version of this policy.
- Only deploy staff who will have unsupervised contact with children, where safe recruitment procedures have been followed.

- Maintain a record of all training undertaken by staff in relation to safeguarding and child protection. This training record should be made available for inspection during any audit and should reflect the timescales for renewal identified in this policy.

### **Safeguarding Lead**

DSL - MOHAMMAD ABU QATADAH (016-6120584/ email:qatadah@apss.edu.my)

Deputy DSL (APIS) -DOMINIC LUCIEN LUK (email: dominic.lucien@apis.edu.my)

Deputy DSL (APSS) -ADRIAN KWOK (email:Adrian.kwok@apss.edu.my)

The designated staff role is guided by two principles:

- The welfare of the child is always paramount.
- Confidentiality should be respected as far as is reasonably possible.

Being guided by these principles the Designated Safeguarding Lead will:

- Play a key role in ensuring that the school takes action to support any student who may be at risk.
- With the Principal, make sure that all staff, both teaching and non-teaching, are aware of their responsibilities in relation to safeguarding and child protection.
- Have appropriate training in addition to the basic training that all other staff receive.
- Collate and keep accurate and confidential records of any concerns about children.
- Have a clear understanding of the local expectations around safeguarding, who to contact, what agencies exist and how to contact them.
- Ensure that the entire school community knows who the DSL is in their setting.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.

All staff will:

- Ensure they are familiar with and follow the policy and all other safeguarding related documents e.g. Codes of Conduct, guidance for safe working practice.
- Be subject to safe recruitment processes and checks prior to starting at the school/organisation (unless an action plan/risk assessment is in place to ensure the staff member is supervised until all checks are completed).
- Be alert to signs and indicators of possible abuse.
- Listen to and take seriously the views and concerns of children.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL).
- Follow the procedures outlined in this document when/if concerned about any child.
- Support students, staff or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.
- Undertake appropriate child protection/safeguarding and safe recruitment training (and refresher training as required by APS).
- All staff and volunteers need to recognise that if their behaviour inside or outside the workplace breaches the APS code of conduct and/or the guidance for safe working practice, this may be considered a disciplinary or even criminal matter.
- All staff who have occasional or supervised contact with children (including staff from partner and contracted organisations) will:
  - Undergo a safeguarding briefing/induction in relation to their role, understand what is required of them if they have concerns and to whom they should report.
  - Provide written confirmation to demonstrate that where appropriate, all partner agency staff/contractors have been safely recruited with appropriate checks undertaken and that a safeguarding briefing has been provided to these staff, (appropriate to the role and contact they will have with children), before they commence their role in any APS school. Where these staff or volunteers are constantly supervised, the recruitment checks may not need to be as rigorous, but it is

- for the Principal/ Designated Safeguarding Lead to assess this risk, not individual members of staff or partner organisations themselves.
- Where partners/contractors do not have their own safeguarding or child protection policy, the APS safeguarding policy will be used and partners/contractors asked to read and follow this. These requirements will be part of any contractual arrangement.
  - Follow the guidance laid down in this document at all times.
  - Be provided with guidance on appropriate safe working practice.
- Staff are not allowed to carry out an investigation about any suspected abuse, unless you are specifically asked to do so. This can be highly specialist work and could interfere with a criminal investigation if this were required and appropriate under local laws.

### **3) Safeguarding and Child Protection**

#### Safeguarding

Safeguarding and promoting the welfare of children refers to the processes of protecting students from harm, preventing the impairment of their health and development, ensuring that we seek to improve the general health and well-being of all students in our care and enabling every student to have the optimum life chances and enter adulthood successfully.

#### Child Protection

Child Protection is the core element of safeguarding and is defined as the responsibility to protect children who are suffering or likely to suffer from harm as a result of abuse or neglect.

### **4) Form of Abuse**

There are a significant number of ways that students may be exposed to risk and danger. All require a response from staff who notices any indicator or gets a disclosure from affected child. Abuse is defined as any form of maltreatment of a child. This can manifest itself as direct harm to a child, or by a failure to take action to protect a child who is at risk of, or already suffering harm.

The more commonly referred to types of abuse are:

- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding or otherwise causing harm to a child.
- Emotional abuse: the persistent maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved or valued only in so far as they meet the needs of another person.
- Sexual Abuse: involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This form of abuse can involve direct contact activities but also non-contact activities over social media or the internet.
- Neglect: This is the persistent failure to meet a child's basic physical or psychological needs likely to result in the serious impairment of the child's health or development.

While the above are the broad four main areas of potential abuse, abuse itself can take many forms involving one or more of these areas.

Staff need to be aware of what to look for and what actions to take when concerned about any of these issues (or any other concerns).

Specific Examples as follows:

#### **a) Female Genital Mutilation (FGM)**

We recognise that this is cultural practice in Malaysia and not always seen as abusive. While not condoning the practice, we need to be aware of the sensitivities surrounding it and always act in the student's best interests.

**b) Forced marriages (FM)**

A Forced marriage (FM) is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

In 2013, the first United Nations Human Rights Council also adopted a resolution against child and forced marriages. This resolution recognises child, early, and forced marriage as involving violations of human rights which “prevents individuals from living their lives free from all forms of violence and has adverse consequences on the enjoyment of human rights, such as the right to education.”

As with FGM and some other cultural practices, we need to be aware of the cultural sensitivities but always act in the students' best interests. However, the school procedures must be followed in the same way as for any other safeguarding or child protection matter.

**c) Self-Harm**

Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. This is why it is so important for schools to spot it as soon as possible and do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. So, whatever the reason, it should be taken seriously.

The exact reasons why children and young people decide to hurt themselves are not always easy to work out. In fact, they might not even know exactly why they do it, but there are links between depression and self-harm. Quite often a child or young person who is self-harming is being bullied, under too much pressure, being emotionally abused, grieving or having relationship problems with family or friends. The feelings that these issues bring up can include: low self-esteem, low confidence, loneliness, sadness, anger, numbness and lack of control in their lives. Young people will sometimes go to great lengths to cover self-harm scars or injuries and/or they will explain any indications of self-harm as accidents.

There are some common themes that may help staff identify concerns including:

- Physical indicators such as cuts, bruises, burns, bald patches (where hair has been pulled out).
- Emotional indicators such as depression, sudden weight loss, drinking or drug-taking, or unusual eating habits and isolation or withdrawal.

If staff suspect that a student is self-harming this must be referred to the Designated Safeguarding Lead who will consider the next steps. It is likely that this will require discussion with the student involved and their Parents/Carer's to agree a course of action or referral to an organisation that may be able to support the student.

**d) Child Sexual Exploitation (CSE)**

The sexual exploitation of children and young people under 18 can involve exploitative relationships where young people receive something in return for performing sexual acts. Exploitation of any student can occur on a face-to-face level or through the use of technology, such as mobile phones or computers. In these situations, a student could be encouraged to send or post indecent images of themselves.

In all cases the person exploiting students does so by misusing the power they have over them. This power may come through virtue of age, physical strength and/or economic resources. Violence, intimidation and coercion are common in exploitative relationships.

**e) Sexting**

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages.

Sexting may also be referred to by students as trading nudes, dirties or pic for pic.

There are many reasons why a student may want to send a naked or semi-naked picture, video or message to someone else:

- Joining in because they think that 'everyone is doing it'.
- Boosting their self-esteem.

- Flirting with others and testing their sexual identity.
- Exploring their sexual feelings.
- To get attention and connect with new people on social media.
- They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent.

Students often do not realise that in creating and sending these images they are potentially committing a criminal act. Ideally, we would not want to deal with these issues as criminal acts. Learning and support can be a more beneficial way of tackling sexting.

**Note:**

*The above is not an exhaustive list of all the potential forms of abuse which staff may have to deal with on occasions. For information please see "Keeping Children Safe in Education" 2022. This is a UK publication but the types of abuse discussed are valid and can apply to any country around the world.*

## 5) Procedures

If staff suspect that any student in their care may be a victim of abuse, or is at risk of abuse or other form of harm, they should not try to investigate, and inform the Designated Safeguarding Lead (DSL) about their concerns as soon as possible.

Staff must disclose any concerns they have about the possibility of a student being abused or placing themselves at risk. It is better to share these concerns, which may later prove to be unfounded, than to hold onto information that may have helped protect a student from actual harm. In many cases a student will not make a direct disclosure, but staff will be concerned because of a physical or emotional indicator. In these circumstances staff should still use the record of concern form (pink form) and the body map (if appropriate), to make a report to the Designated Safeguarding Lead.

Where any student makes any form of direct disclosure, the guidelines under the heading 'Dealing with Disclosure' below should be followed.

*Note: Be aware that if a child asks to speak to someone in confidence about a problem, no one should ever promise confidentiality if what the child discloses or is likely to disclose relates to abuse being suffered by them or another child. Staff should always give this as a health warning before meeting with the child.*

The following guidance is based on five key practices for all staff in *Dealing with Disclosure*:

### Receive

Where possible always stop and listen to a child who wishes to speak in confidence. We know that children will often find the most inconvenient time to do this, but it is important that you make time for the child, even if this is to say "I can't stop now but come and see me in my office at....". Where possible during any disclosure try to listen, allow silences and try not to show shock or disbelief.

### Reassure

Try to stay calm, make no judgements and empathise with the child. Never make a promise you can't keep. Give as much reassurance as you can and tell the child what your actions are going to be. Reassure the child that they are doing the right thing by telling you.

### React

React to what the child is saying only in as far as you need to for further information. Don't ask leading questions. Keep questions open such as... "is there anything else you need to tell me?". Try not to criticise the alleged perpetrator as this may be a family member for whom the child may still have feelings.

### Record

Make brief notes about what the child says during the conversation, but if this is not possible, make notes as soon after as you can and certainly within 24 hours. Make sure to record exactly what the child says and not your interpretation of what is said. Record the time, date and place as well (see the record of concern form).

### Report

Where a child makes any disclosure, or where you have concerns for any reason, it is very important that the procedures outlined in this document are followed. A full written/typed account of the concern (ideally using

the record of concern form-pink form) should be passed to the Designated Safeguarding Lead as soon as possible and should include, where relevant, a completed body map.

Where a child has made a disclosure and alleges abuse, the Designated Safeguarding Lead (or Principal in the absence of the DSL), should be informed as soon as possible. The Designated Safeguarding Lead will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The Designated Safeguarding Lead will then consider and where necessary, consult on the information available. It is the role of the Designated Safeguarding Lead to make decisions about what action to take next and to make the decision whether to take the matter further within the local legal framework. It is important that a full record of all the information and decisions made are recorded and stored confidentially.

## **6) Confidentiality**

Schools should regard all information relating to individual Safeguarding/child protection issues as confidential, and should treat it accordingly. Information should be passed on to appropriate persons only at the discretion of the Principal/Designated Safeguarding Lead and this should always be based on the need to know.

## **7) Specific Safeguarding Issues**

### **a) E safety**

The growth in electronic media in everyday life and an ever-developing variety of devices create additional risks for children. Risks and dangers of being online include:

- Inappropriate content.
- Ignoring age restrictions and communicating with unknown adults or other children (which make children vulnerable to bullying and grooming).
- Grooming and sexual abuse.
- Sharing personal information.
- Gambling or running up debts.
- Cyber Bullying.

Cyber bullying is an increasingly common form of bullying behaviour and is most often related to social networks and mobile phones.

APS believes the best way to protect our students is to teach awareness and understanding of risk, particularly through personal, social and health education, sex and relationship education or wellness programmes. School's curriculum includes appropriate and frequent opportunities to teach children how to recognise when they and others are at risk and equips them with the skills, strategies and language they need to take appropriate action.

### **b) Mobile phone and Camera Images**

It is our policy that practitioners, teachers and visitors to our Early Years settings should not use personal mobile phones to take images of children. In our primary and secondary schools, if personal equipment is used to capture child images, these images should be uploaded to the schools' system as soon as possible and immediately deleted from personal equipment. Permission to capture images, videos or audio recordings should be sought from the Designated Safeguarding Lead or Principal for the school.

Photographs for School Publications:

- Photographs of students being used by staff for learning or marketing are only taken on school cameras/devices.
- Images should be saved on a secure server/database and printed copies only used within the school for purposes such as displays, records and learning journals. Images to be used for marketing need to be agreed with parents/carers before use.
- Staff personal phones should not be used in classrooms and learning areas when students are present except where required as a response to emergency planning.
- Visitors and parents/carers should be asked not to use mobiles devices within the school and/or early years setting, except where permission has been granted to capture images of their own child or children. All parents/carers must give permission for photographs to be used for publicity purposes and to sign a disclaimer if they do not wish their child's image to be used externally.

### **c) Allegations against staff and volunteers**

An allegation can be made against a staff member or volunteer at any point. It is important that any such allegations are treated seriously and appropriate procedures followed.

An allegation is different to a complaint and can be defined as follows:

- Where someone has behaved in a way that has harmed or may have harmed a child.
- Where someone has possibly committed a criminal offence against a child.
- Where someone has behaved in a way towards a child or children that would pose a risk to children.

In the event of an allegation being made against a member of the school staff (or a volunteer helper), it will always be investigated by the Principal/ Head teacher unless a criminal act has been committed, in which case the matter should be referred to the local authorities where appropriate. In all cases (criminal or not) the Principal and ISP Group H&S Director must be informed as soon as possible and certainly within 48 hours. In the case of the allegation being against the Principal, the ISP Regional Managing Director and the Group H&S Director should be informed.

No action to investigate the concern should be taken before consultation with ISP the Group H&S Director, and agreement reached about how best to approach and investigate the concern. If it is felt, after these initial consultations, that further enquiries are needed, then the member of staff may be suspended. Suspension is a neutral act, and in no way implies that the person is guilty of any wrongdoing. It is acknowledged that this would be distressing for the person concerned, and the school will do all it can to balance the interests of any individual with that of the need to keep children safe. The school will seek advice from the ISP Group H&S Director before acting and will comply with national and locally agreed guidance on these matters. Each school is expected to have researched and mapped the local arrangements and guidance for dealing with allegations.

Staff will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within the code of conduct for staff and volunteers and the guidance for safe working practice.

### **d) Whistleblowing**

APS recognises that we cannot expect children to raise concerns in an environment where adults fail to do so. All staff and volunteers should be aware of their duty to raise concerns about the actions or attitude of colleagues. Appropriate concerns raised for the right reasons are considered to be a protected disclosure and, even if proven to be unfounded, no action will be taken against the whistle-blower.

Malicious whistleblowing however, will be seen as a potential disciplinary matter. APS has a separate Whistleblowing Policy Statement which must be referred to and fully referenced in the event of such an incident.

### **e) Anti-Bullying**

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Staff at every level will take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to prevent repeat incidents or behaviours. Bullying may involve either face-to-face or the misuse of social media or technology. Each school should have its own policy and approach to restorative practices and all our schools will demonstrate a commitment to help resolve specific issues. APS has a separate Anti-Bullying Policy Statement which must be referred to and fully referenced in relation to the bullying of any student.

### **f) Children with Special Educational Needs or Disabilities**

All staff should recognise that children with Special Educational Needs and Disabilities can mean additional safeguarding challenges. Depending on the nature of a child's special need or disability, additional barriers can exist which make it more difficult to identify and recognise signs of abuse. For example, it is easy to assume that a child's mood, behaviour or any injury relates to their disability rather than the fact they may be suffering abuse. It should also be recognised that children with disabilities may be disproportionately impacted on by behaviours such as bullying but they may not show any outward signs. Communication difficulties, in particular, can make it very difficult for a child to indicate what's happening and, therefore, may make it very difficult to overcome any such barrier. Staff should be extra vigilant and report any and all concerns, avoiding making assumptions about the causes of any injury or behaviour.

**g) Allegations made by a child about another child (Peer on peer abuse)**

APS recognises that children are capable of abusing their peers. Where an allegation is made that one child may have abused another, this will always be taken seriously and dealt with as a safeguarding matter. Peer on peer abuse can take many forms, and gender issues can be prevalent when dealing with this type of abuse. Examples can include girls being touched/assaulted inappropriately by boys, or boys themselves being subject to initiation violence. This type of peer on peer behaviour will not be tolerated.

Under no circumstances should an allegation that one child has possibly abused another be treated “as just children being children” or “experimentation”.

If the alleged actions are unwanted or involve minors who may not be able to give consent by virtue of their age or any disability, then this is potentially abusive and the school procedures should be followed in the same way as for any other safeguarding or child protection matter.

**h) Safeguarding students who are vulnerable to extremism**

APS values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society’s values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or leads to violence and harm of others, goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Any freedom of speech which promotes violence against anyone or anything else will not be tolerated.

**i) Physical Intervention/restraint**

There may be times when adults in schools, in the course of their school duties, have to intervene physically in order to restrain students and prevent them from coming to harm. Such intervention should always be both reasonable and proportionate to the circumstances and be the minimum necessary to resolve the situation. UK government guidance has been issued in relation to the use of reasonable force and can be used as best practice advice.

The Principal should require any adult involved in any such incident to report the matter to him/her as soon as possible. The staff member is required to document the incident in full giving a description and full account of the incident. Witnesses to the incident should be identified where possible.

Where intervention has been required a senior member of staff should be asked to debrief the student and allow them to describe the incident from their point of view. Written notes of this conversation should be kept and the student checked for any injuries.

Parents/carers should always be informed when an intervention has been necessary.

**j) Safe Recruitment and Selection**

APS will ensure that all those working with children in our schools and across the whole organisation are suitable people. In order to do this, all staff who will work in an unsupervised capacity with children or young people will be recruited using safe recruitment procedures.

Safe Recruitment involves scrutinising applicants through the interview process and application forms, verifying identity, qualifications and obtaining appropriate references, undertaking criminal background checks from all countries where the applicant has lived or worked in the last 10 years, as well as some additional recruitment checks.

**k) Managing visitors into the campus**

To ensure students are safeguarded from any possible abuse in school, only staff who have passed the Criminal Background Check (CBC) and attended school’s in- house Safeguarding training are allowed to be on campus and they are required to wear a green lanyard (staff under school’s payroll) and yellow lanyard (outsourced personnel). Other individuals must follow the guidelines below if there is a need to come into the campus:

- Register at the guard house and be given a Red lanyard and will be always accompanied by a member of staff with green lanyard or the school security officer in the campus.
- Individuals without any lanyards should be prohibited from entering the campus.

There are dangers in the wider world beyond the school gates from which we need to protect children. These wider dangers include people with ill-intention. It is right that the school takes all reasonable actions to shield our students from these dangers.

#### **8) Key Contacts Information:**

APS will be in contact with local agencies and bodies who can both advise or accept referrals. The agencies will be the school source to seek advice from or make referrals to.

Talian Kasih	15999
Kelana Jaya Police Station Petaling Jaya District Headquarters	03-7806222 03-7966222. (Email:kpdjaya@rmp.gov.my)
<b>Jabatan Kebajikan Masyarakat Negeri Selangor</b> (Community Welfare Department- State) Unit G6, Tingkat Bawah IDCC Shah Alam Jalan Pahat L, 15/L, Seksyen 15, 40200 Shah Alam, Selangor.	Tel : 03-5545 5598 Faks : 03-5545 5229 Emel : jkmn_selangor@jkm.gov.my
<b>Women Aid Organization (WAO) (PPM-001-10-08041983)</b> P.O.Box 493 Jalan Sultan 46760 Petaling Jaya Selangor	Tel: 03-7957 5636/ 0636 Hotline: 03-3000 8858 SMS/Whatsup: 018-9888 058 Email: info@wao.org.my
<b>Protect And Save The Children Association of Selangor and Kuala Lumpur (Reg. No. PPM-001-10-01092002)</b> F-05-01, Pacific Place, Jalan PJU 1A/4, Ara Damansara, 47301 Selangor.	Tel: 016-2273065 / 016-7213065 016 721 3065 Emergency Email: protect@psthechildren.org.my