



# CHARTERHOUSE MALAYSIA

<b>Policy:</b>	Safeguarding and Child Protection Policy		
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<b>Ownership:</b>	Senior Leadership Team	<b>Derived From:</b>	Charterhouse UK and Asia

Key Person	Name	Contact Details
Designated Safeguarding Lead	Tom Robinson	Email: <a href="mailto:tom.robinson@charterhouse-htms.edu.my">tom.robinson@charterhouse-htms.edu.my</a> Mobile: +60125173619 Office: +60327025272
Deputy Designated Safeguarding Lead	TBC	
Headteacher	Richard Davidson	Email: <a href="mailto:richard.davidson@charterhouse-htms.edu.my">richard.davidson@charterhouse-htms.edu.my</a> Mobile: +60125193619 Office +60327025271
Chair of the Governors	TBC	
Governor with leadership responsibility for safeguarding	TBC	

## Derivation of this Policy

This policy is derived from the policy of the same name in operation at Charterhouse, UK, and Charterhouse Asia and acknowledges the expertise that went into its preparation. It has been adapted in details to reflect the local context of Charterhouse Malaysia but is, deliberately, substantially the same as the policy of the home school.

## Part One: Key principles, documents and definitions

1. This policy is openly available to anyone. Members of staff at Charterhouse Malaysia are obliged to read it, and it is the responsibility of school leaders to ensure it is fully implemented. The policy also provides information to students, parents, and others, about how safeguarding and child protection work within Charterhouse Malaysia.
2. Charterhouse Malaysia must ensure that its safeguarding policy and practice follows the law. The policy below, being derived from the policy of Charterhouse UK, is drafted with reference to UK law. However, it is compatible with both the Malaysian Child Act, Act: 611 (2001) and the Malaysian National Child Protection Policy (2009). Reference to the UK documents referred to below is consistent with compliance with these ordinances.

The chief regulatory references from UK law are the following documents:

- *Working Together to Safeguard Children* (HM Government, 2022)
- *Keeping Children Safe in Education* (HM Government, September 2022)
- *Boarding Schools: National Minimum Standards* (HM Government, 2022) for future potential Boarding.
- *Procedures Manual* (online: Surrey Safeguarding Children Board, July 2018, regularly updated)
- *Handbook for the Inspection of Schools: Commentary on the Regulatory Requirements* (Independent Schools Inspectorate, September 2018)

In addition, Charterhouse Malaysia is committed to COBIS accreditation as guidance to the implementation of these UK derived policies in an international setting.

3. This policy is reviewed annually by the Designated Safeguarding Lead at Charterhouse Malaysia, working with the Director of International Education (DoE), and is submitted to the governing body of each school for approval and comment in the first term of each school year.
4. In this policy, 'members of staff' means anyone directly employed by Charterhouse Malaysia, whether as teaching or non-teaching staff, but must also be taken in the broader sense to include regular contractors such as instructors, property management, catering staff, sports coaches, in addition to volunteers, and any interns or students or others engaged on work experience placements.
5. This policy is one of a number of linked and sometimes overlapping documents related to Charterhouse Malaysia, Charterhouse Asia and also to the corresponding Charterhouse UK policy documents, available to all Charterhouse Malaysia staff on the internal "MS Teams" platform.
6. In English and Malaysian Law, a child is defined as a person who has not yet reached his or her 18th birthday. The terms 'child' and 'childcare' are used in this policy to refer to anyone under 18.
7. The duty of Charterhouse Malaysia staff is to report concerns. Should a circumstance arise that may lead to a reporting obligation to the public authorities, guidance should immediately be sought from the Charterhouse Asia Headquarters Legal Team.
8. In this policy, 'public authorities' refers to the government agency or agencies within Malaysia and with which the school will liaise in the event of a matter arising where the school needs to consult and work with a regulatory body.
9. **Language:** The first language of any individuals involved in reporting and investigating of any concern should be used and due regard paid to ensure all individuals have full and sensitive mother tongue understanding of any procedures.

### **The meaning of 'safeguarding' and 'child protection'**

10. There are **four** elements within the UK government's definition of safeguarding. **Two** of them:
  - a. "Ensuring that children grow up in circumstances consistent with the provision of safe and effective care" and
  - b. "taking action to enable all children to have the best outcomes", refer to the general activity of safeguarding and promoting the welfare of every single one of our students.
11. Charterhouse Malaysia recognises that children have a right to feel safe and secure, and they cannot learn effectively unless they do. We also recognise that it is the responsibility of each and every member of our staff to provide a safe environment for children. In that sense, 'safeguarding' an umbrella concept incorporating a number of areas covered in separate policies: our recruitment methods, our security arrangements, our health and safety practice, the management of our computer network, and so on.
12. We aim to teach our students how to look after themselves and each other. To that end we use the House Tutor period and Assemblies and other sessions to educate all our students about safeguarding, consent, and how they can recognise and build resilience to various forms of bullying and abuse, including peer-on-peer abuse. We aim to teach them about the risks posed by adults and children who

use methods including the internet, mobile technology, and social media to bully, groom, exploit, or radicalize, other people. We also aim to teach our students to understand and appreciate the fundamental values of democracy, the rule of law, individual liberty, and both mutual respect for and tolerance of those with different faiths and beliefs. We work with the national expectations of each territory in which we operate, complementing our affiliation with and teaching of 'Fundamental British Values' with a full embrace of, and respect for, Malaysian values and traditions as delivered through patriotic education. Additionally, using focus groups, Tutor time, surveys, student forums, and other means, we aim to listen to our students' own views about their safeguarding, and to respond appropriately.

13. The **second two** of the four parts within the definition of safeguarding are:
  - a. "protecting children from maltreatment" and,
  - b. "preventing impairment of children's health and development".

These relate to the more specific activity of child protection, which means working to protect particular children from abuse and neglect. This is sometimes reactive, meaning responding quickly and effectively to the needs of children who have already been identified as suffering, and sometimes predictive, meaning identifying specific children at risk and addressing their needs before they become serious problems.

14. Knowing what to look for is vital to the early identification of abuse and neglect, and effective safeguarding relies on information sharing. Regular training for all staff will be implemented. In due course, when appropriate, older students in suitable prefect or Monitor type roles will receive training on the kinds of things to look out for in their dealings with peers and younger students.
15. Above all, if we are to offer our students the highest quality of pastoral care, we need in particular to have a culture of vigilance amongst our staff. That means members of staff need to be in the habit of thinking 'it could happen here'; be constantly on the alert and sensitive to the presentation and needs of students; be willing to listen to children; and in any given situation be instinctively ready to put the interests of the child above all other considerations.
16. Charterhouse Malaysia's approach to safeguarding is child-centred. This means, firstly, keeping children in focus when making decisions about their lives, and working in partnership with them and their families. As such (unless directed not to by outside agencies), the school will always speak with the child to find out what he or she would like to happen. It also means, secondly, that the school is committed to acting in the best interests of the child. If, for example, there is a conflict of interest between a child and an adult, the welfare of the child will be the paramount consideration. Members of staff must never try to cover up concerns about children, delay reporting them, or otherwise ignore them.
17. **Barriers to reporting**: staff should be aware that there are a number of factors which could either delay or prevent a concern from being raised. Children themselves may decide to say nothing because they are embarrassed, afraid they will not be believed, struggle with communication, or fear the consequences of speaking up, worrying that the school will over-react and they will get people they care about into trouble. A greater risk of abuse is faced by children who come from chaotic home backgrounds, or might be discriminated against on the grounds of race or sexuality, or who are disabled or who have special educational needs. This is because they may be more prone to peer group isolation than other children, or disproportionately impacted by bullying or abuse without outwardly

showing any signs. This greater risk may well exist due to societal attitudes and assumptions (for example, that indicators of possible abuse, such as behaviour, mood, and injury, must relate to the child's disability), rather than to any aspect of the individual child's personality or circumstances.

18. Sometimes, however, it is adults who delay or avoid reporting concerns. Although the rights of the state to intervene in family life to protect the child is established in the UK by the Children Act, 1989, with corresponding principles operating in Malaysia, adults sometimes lack faith in the system, and fail to raise concerns because they have made a personal decision that the damage likely to be caused by the process will be greater than any benefit. Others are likely to be inhibited by cultural taboos and there are complex sensitivities in Malaysia that must be understood but which must not be allowed to get in the way of maintaining the standards to which we commit in this policy.

In schools, a teacher's need to maintain a good relationship with parents can sometimes obscure the best interests of the child. Staff sometimes worry that they cannot share confidential information however the principle operates that there is no legal or regulatory barrier to sharing information where the failure to do so would result in a child being placed at risk of harm, and that fears of sharing information cannot be allowed to stand in the way of the need to promote children's welfare.

Other barriers to reporting include an occasional tendency to 'normalise' or 'explain away' low-level concerns while ignoring the jigsaw effect whereby a number of colleagues hold pieces of information which seem to them separately very trivial but when put together become significant. At no time should the notion that the school's 'name' might be harmed in some way, or a member of staff be resented by the school leadership, by reporting a concern ever be a consideration; the opposite will always be the case.

19. It is not the job of members of staff to investigate safeguarding issues or to make judgements about the kinds of concern which ought to matter or not. It is their job to share concerns quickly, and with the right person (**the procedure for concerns is explained below, from paragraph 29**). However, at times, members of staff will need to make decisions about what action to take. They may need to use their professional judgement to decide whether or not the evidence or the explanation they have been given satisfactorily accounts for what they have seen or heard.
20. So that they are able to do this, all staff are required to undergo training *in Child Protection Basics in International Schools* by Educare (part of TES) and to have a good working knowledge of the specific kinds of concern they should be looking out for. Further to this in-house localized Safeguarding Training will be provided as part of the induction week at the start of each school year and at various points throughout the school year. In particular, they are required to be familiar with the government's definitions of abuse and neglect in *Keeping Children Safe in Education*.

What follows, **Part Two**, is a list of the different kinds of presentation and behaviour to which members of staff and others should be alert, together with guidance on how to report each of those concerns.

## **Part Two: Concerns about Children**

21. Charterhouse Malaysia adopts the approach taken by Charterhouse Asia and Charterhouse, UK, in working with the approach of the Surrey Safeguarding Children Board document called ***Levels of Need*** which sets out in detail the indicators, symptoms, and behaviours which people who work with children must look out for constantly. It divides those into **four** levels of need. All children will fit into one of the four levels.

## Level Four: abuse and neglect

22. Level Four, the highest level of need, is defined by Sections 17 and 47 of the UK Children Act 1989. Under Section 17 of the Act, a child may not be immediately at risk, but his or her needs are already regularly unmet, and without the intervention of specialist support services, the situation will quickly deteriorate. Under Section 47 of the Act, the local authority and partner agencies must intervene when children are either suffering, or at risk of suffering, significant harm. It is the duty of the school to pass on to the local authorities any possible concerns under Level Four. In Malaysia, we will adhere to these guidelines and engage the appropriate public authorities where any concerns are identified that fit this level Four description.
23. Significant harm is caused when a child's health or development is seriously or permanently altered or damaged. Inflicting significant harm on a child, or failing to act to prevent it, is a definition of child abuse and neglect. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (for example, via the internet). They may be abused by an adult or adults, or another child or children.
24. Detailed lists of the symptoms, indicators and behaviours associated with child abuse and neglect which are used by health and social care professionals can be found here:

### Child maltreatment: when to suspect maltreatment in under 18s

These indicators are outlined in the following five paragraphs, parts of which are copied word-for-word from Keeping children safe in education (2018) and the UK government document, What to do if you're worried a child is being abused. While not all the information about agencies and protocols in these documents will apply to Charterhouse Malaysia, the guidelines are universal and should be taken as the basis for practice.

25. **Physical abuse** is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Nearly all children experience accidental cuts and bruises as a routine part of growing up, but staff who work directly with children should always be professionally curious about fresh injuries. Detailed information on the kinds of injury most often associated with intentional harm is given below, in Annex 1. A conversation with a child about a recent absence or injury may initially be light-hearted, but staff should be concerned if:
  - A child's explanation does not seem to match an injury
  - A child is evasive or appears reluctant to discuss the matter
  - A child tries to cover up a bruise, wound, or scar
  - A child's explanation is muddled or alters in re-telling
  - A child appears to have avoided changing for sports or seeking treatment for an injury

Unless members of staff are absolutely satisfied by the evidence or explanation, they should treat the matter as a cause for concern and report it (see paragraph 30 below). Staff considering the possibility of intentional harm (by an adult or another child) should not take pictures or ask a child to remove clothing.

26. **Sexual abuse** involves 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific issue in education (see below, paragraphs 38-42). Staff should be particularly alert to children who:

- Use sexual language or have knowledge you wouldn't expect them to have
- Ask others to behave sexually or to play sexual games
- Display knowledge or interest in sexual acts inappropriate to their age

Staff seeking advice on what kinds of sexual behaviour are considered appropriate and inappropriate for teenagers may find this resource useful:

[Brook sexual behaviour traffic light tool](#)

Further information on sexual abuse is given below, in Annex 3.

27. **Child sexual exploitation** ('CSE') is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. Children who are being groomed often resent what they perceive as interference by other adults, and rarely self-report CSE, meaning that staff must be particularly vigilant to potential indicators of risk. Sexual exploitation may be indicated if a child:

- Acquires money, clothes, mobile phones (etc) without plausible explanation
- Becomes isolated from peers and social networks, and/or secretive
- Forms relationships with controlling or older individuals or groups
- Goes missing from home or school without explanation
- Regularly returns home late, or perhaps under the influence of drugs or alcohol
- Exhibits age-inappropriate sexualized behaviour, or sexually transmitted infection
- Suffers from mood-swings or changes in emotional well-being

Further information about CSE can be found in this government publication:

[Child sexual exploitation: definition and guide](#)

Although produced by Surrey County Council, rather than in Malaysia, the following document is a relevant and useful resource to help staff run through any concerns they may have about sexual exploitation:

[Surrey SCB child sexual exploitation screening tool](#)

28. **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy (for example, as a result of maternal substance abuse). Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect is not a function of social and economic disadvantage, although in affluent families it can be difficult to recognise and address. At Charterhouse Malaysia, staff should be particularly alert to any suggestion that:

- A child has been left unsupervised during time away from school, or with an inappropriate carer
- Medical, dental, food, clothing, or other basic needs have not been met while away from school
- A child has been exposed to dangerous or illegal behaviour during time away from school
- A child, unchecked, exhibits dangerously reckless behaviour (including sexual and/or online)
- A child appears to begin thriving on return to school

Further information on the kinds of presentation which might suggest neglect can be found below in Annex 4.

### **How to report these concerns**

29. Members of staff, parents, students, or other persons with concerns about children in any of the above contexts – physical, emotional, or sexual abuse, or neglect, should report them as follows:

Staff must report all concerns about students to the Designated Safeguarding Lead (DSL), or Deputy DSL (once appointed), using the contact details in the staff handbook. Parents, students, and others are asked to contact the DSL or Deputy promptly.

30. For staff, 'immediately' means as soon as practically possible, bearing in mind that the welfare of the child is on paramount importance and therefore other activities and commitments cannot take precedence. Obviously there may be factors affecting the speed with which things can be done but members of staff are expected to act without hesitation in the case of children who need immediate support, and otherwise to record any concerns that might be classed as Level Four with the DSL or Deputy DSL within 4 hours, by phone or in person. It is likely that colleagues will need, or will be asked, to record their concerns in writing (see below for example, paragraph 64), but notes, text messages, and emails should not be used as a primary or sole means of reporting.

31. In all potential cases of abuse or neglect, without exception, the DSL, or Deputy DSL, will either formally refer the case to the local public authority and/or the police immediately (and certainly within 24 hours) or consult them with a view to doing so. Depending on the response and assessment of the regulatory agencies, the school will cooperate fully with that process and staff should be aware that they may be asked to take part in meetings about children with needs at Level Four as part of the case management by the authorities.

32. The school will aim to involve parents promptly, and is mindful of the government's document:

[Information sharing: advice for practitioners providing safeguarding services to children \(July 2018\)](#)



However, every case will need to be handled individually and the school cannot inform parents or seek their consent if to do so might:

- Place any person at increased risk
- Affect any potential criminal investigation
- Lead to an unjustifiable delay in reporting
- The school is otherwise directed by the authorities

If the school thinks that notifying parents of a referral might impede an investigation or place a child at risk of harm, it will not contact parents, but will follow the advice of the police or other relevant agencies regarding communication with parents and students.

33. During term-time, the DSL and/or the Deputy DSL will be available at all reasonable times to discuss safeguarding concerns with colleagues, students, or others. 'Reasonable hours' in a day school setting is 8am to 5pm. Weekends are 'reasonable' for these purposes. If either the DSL or Deputy DSL will be absent for more than 24 hours, this will be recorded on the intranet as a notice to all staff. Out of term-time, if children are present on the campus (in the event of summer schools or suchlike activities) arrangements will be made to ensure the presence of someone qualified to take the lead in safeguarding matters. Where a potential partner on some sub-letting activity cannot provide this presence to a level of competence satisfactory to the Head of School then the activity will not proceed.
34. In exceptional circumstances, the DSL or Deputy DSL may not be available, or one may be available but the language situation is such that a competent local colleague is required and unavailable. In such a situation, staff should not delay, but should either consult another member of the leadership team of the campus or consider contacting the local authority and/or police directly (but only in liaison with a native speaker of the language of the country of operation drawn from the staff of the school). Staff consulting in this manner, or making a direct referral, should keep careful written records of their actions and inform the DSL or Deputy DSL as soon as possible.
35. In addition to the varieties of abuse and neglect just described, there are a number of specific issues which people who work in schools are required to know about. These are explained next. They are covered separately because some involve specific guidance or have special reporting requirements.

### **Children: specific concerns, and how to report them**

36. **The mental and physical health of students:** members of staff who become aware of any of the following must report them to the DSL or Deputy DSL immediately:
  - A student who is considering, has a plan for, or is making an attempt at suicide
  - A student who has repeatedly self-harmed (cutting, burning, picking, scratching, banging, hitting, etc.)
  - A student with an eating disorder
  - A child missing most immunisations
  - A child with emergent serious physical health issues (but without a diagnosed medical problem)
37. **Peer-on-peer abuse:** people under the age of 18 are capable of physically, sexually, or emotionally abusing other people under the age of 18. The evidence suggests that girls are more likely to be victims and boys perpetrators. Peer-on-peer abuse includes, but is not limited to:

- **Sexual violence and sexual harassment.** This can occur between two children of any age and sex, and can involve individuals or groups of children. ‘Sexual violence’ refers to criminal behaviour such as rape or assault as defined by the UK Sexual Offences Act, 2003. ‘Sexual harassment’ refers to conduct of a sexual nature which is unwanted by the person on the receiving end, either in the physical world or online, and relates either to those who are, (or who are perceived to be), heterosexual or homosexual, such as:
  - Telling sexualised stories or jokes
  - Making sexualised comments about clothes, appearance, or behaviour
  - Calling someone sexualised names
  - Displaying sexualised images
  - Making sexualised threats
  - Physical behaviour such as touching or squeezing bottoms, breasts, and genitalia, interfering with someone’s clothes, or brushing against someone in a sexual manner. Staff should be aware that these kinds of physical behaviour can *easily* cross the line from harassment into sexual assault.

Staff should also be aware that students who are abused in any of these ways may hide it well, but are likely to be profoundly affected by their experiences. Charterhouse Malaysia cannot allow its students to suffer in this context, and it will not send young people out into the world believing that this kind of behaviour is somehow acceptable. Further information is available in Part 5 of [Keeping children safe in education \(2018\)](#) and in the UK government’s document [Sexual violence and sexual harassment between children in schools and colleges](#).

- **Sexting**, which is also called **Youth Produced Sexual imagery (‘YPSI’)**, is the creation and sharing of sexualised images by people under the age of 18, usually via mobile phones, social media sites or direct messaging such as ‘Snapchat’ or ‘WhatsApp’ (where operating, or ‘WeChat’. Even for a child, making, viewing or sharing a sexual image of someone under 18 is a criminal offence in the UK and as a British school, we will remain consistent with these legal definitions and standards. This is also behaviour that can quickly become more harmful. As such, ‘sexting’ is a safeguarding issue and in every instance, must be referred to the DSL or Deputy DSL, who will then follow the school’s protocol. In particular, members of staff who suspect that a sexualised image of a child is contained on an electronic device should not ask to view the image, but should consider confiscation (while bearing in mind that the confiscation of one student’s device may quickly affect the circulation or deletion of images amongst other children within the ‘user group’). Information for school staff on the confiscation of electronic devices from students is given within the government’s document, [Searching, screening and confiscation](#).
- **Physical abuse and bullying** (including online bullying through social networks, online games, or mobile phones). Single or multiple instances of hitting, kicking, shaking, biting, or hair pulling, may be abusive if they cause harm. Any form of bullying can become emotionally harmful, and thus abusive, in that it can quickly have a profound effect on a young person’s development. More detailed information on the point at which ‘bullying’ becomes ‘abuse’ is provided in the Charterhouse Malaysia anti-bullying policy.

38. It is not acceptable to tolerate any form of peer-on-peer abuse – physical, sexual, or emotional – as ‘banter’, or ‘just part of growing up’, or ‘kids having a laugh’, or ‘boys being boys’. Staff may find that they are asked to see some behaviours as being acceptable in the culture of the country in which they are operating, and that they are not able to judge as they are foreigners. Peer-on-peer abuse is

therefore to be treated as seriously as abuse by adults and to be subject to the same safeguarding procedures. All members of staff are trained in identifying and responding to allegations of potential peer-on-peer abuse, they are advised that they must not attempt to deal with peer-on-peer abuse as a pastoral, classroom, or disciplinary issue, and should not impose their own thresholds before referring concerns to the DSL or Deputy DSL. It is true that there will sometimes be a grey area between, on the one hand, incidents which should be regarded as abusive, and on the other, incidents which are more properly dealt with in schools such as (for example) children fighting or experimenting sexually. The DSL can advise staff on the thresholds which pertain to different definitions of peer-on-peer abuse.

39. If there is any reasonable cause to suspect that a child has suffered, or is likely to suffer harm, at the hands of another child, the DSL will refer the matter immediately (and certainly within 24 hours) to the relevant local authorities under whose directions the school will then follow. Allegations against students who have left the school but remain under 18 will be passed to the police and other relevant local authorities. Generally speaking, the school will seek to quickly inform the parents of victim(s) and perpetrator(s) of potential peer-on-peer abuse, unless paragraph 32 (above) applies.
40. A victim of peer-on-peer abuse is likely to need considerable support. In addition, the perpetrator is likely to have unmet needs (the evidence suggests that such children have often suffered disruption in their own lives) as well as posing a risk of harm to other children. As such, a student against whom an allegation of abuse has been made may be suspended from school during an investigation. After the immediate issues have been addressed, and depending on the severity of those issues, the local authority may decide to oversee risk assessments and care plans for the victim and/or the perpetrator, in which case the school will cooperate fully.
41. **(a)** it is also possible and, in some jurisdictions, likely, that the local authority will decide to hand the matter back to the school, in which case the DSL will take responsibility for recording the concern in the safeguarding log and supervising any investigation required. The needs of the victim and/or perpetrator will be addressed as matters of 'Early Help' (see paragraph 51 forwards, below), and the DSL or Deputy DSL will write, implement, and review any risk assessment judged necessary.  
**(b)** To help minimise the risk of peer-on-peer abuse, Charterhouse Malaysia takes a multi-component strategy involving (amongst other things) PSHE education (usually in the form of House Tutor period), student surveys, and careful record keeping; initiatives allowing students to report worries and concerns quickly and confidentially; dedicated training for staff and students in roles of responsibility; opportunities for parents to attend (for example) safer internet presentations; and robust policies which are implemented consistently and without hesitation.
42. **Children Missing Education (CME):** students who disappear from the educational system, or go missing for periods of time, are far more vulnerable to abuse and neglect. In the case of a staff member becoming aware of a child missing from school for ten days or more, without medical certification, then the DSL must be informed. While this is a legal requirement in the UK, rather than in Malaysia it is also our policy that staff are required to inform the DSL if they become aware that, at anytime during the school holidays, a student has been resident for 28 days or more with a person who is not a close family member.

## **Families: specific concerns, and how to report them**

43. A number of family situations can suggest that children have needs at Level four because they significantly increase the chances of abuse or neglect. Members of staff who become aware of any of the following should consult with the DSL immediately:
- Families in which relationship have broken-down, such that students have either moved beyond parental control or been excluded from the home
  - Families in which separation or divorce involve the child being used as a pawn
  - Families in which mental health, substance, abuse (including alcoholism) or disability makes it difficult for parents to provide children with adequate support
  - Families in which a parent is in prison or involved in serious criminal activity
  - Families in which one member abuses another (domestic abuse and violence)

### **Communities: specific concerns, and how to report them**

44. **Contextual safeguarding**": in addition to threats to the welfare of children from within their families, and to situations which involve their health or relationships within school, members of staff and others should be aware that children may be vulnerable to abuse or exploitation in the wider community and/or online. Parents and carers sometimes have little influence over the relationships that children form in these contexts, meaning that assessments and interventions need to focus not only on the family, but also on these wider environmental factors. The possibility of sexual exploitation has already been included (see above, paragraph 27). Two further threats are considered next.
45. **Child criminal exploitation** (CCE) is a geographically widespread form of harm often associated with the practice of criminal gangs exploiting young children to carry drugs and money from one location to another. As with child sexual exploitation, it is typified by some form of power imbalance and can still be exploitation, even though the young person consents to the activity.
46. **Honour based violence** (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community. Of these crimes, one of the most significant is **forced marriage**, which is a marriage entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used. Forcing a person into a marriage is a crime in the UK and will be addressed as such by Charterhouse Malaysia. It should not be confused with arranged marriage. A lack of full and free consent can be where a person does not consent or where they cannot consent (where they have learning disabilities for example. Some communities may use religion and culture as a way to coerce a person into marriage, or to justify a forced marriage in terms that indicate someone not of that culture has no place to act. Simply put, anyone who believes that a child (or adult) is in imminent danger of being forced into marriage must contact the local police and raise their concerns. Anyone with concerns about a family exerting pressure upon a child in this context should consult the DSL.
47. **Female genital mutilation** ('FGM') comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Anyone who believes an act of FGM is about to be carried out on a girl (or woman) must phone the police. There is, in the UK, a statutory duty upon teachers to report to the police directly where they discover, in the course of their work in the profession, that an act of FGM appears to have been already carried out on a girl under 18. While this statutory responsibility does not apply in Malaysia, staff should nonetheless consult with a member of the leadership team on campus about making a report to the relevant authorities. Unless the teacher has a good reason not to, they should discuss any such case with the DSL and involve children's care as appropriate. A girl who has an immediate family history of FGM should be considered 'at risk' and

members of staff who learn of that history should report it to the DSL. The same applies when members of staff know that a girl comes from a family who come from a country where FGM is practised.

48. **Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremism. Radicalising children is a form of abuse, and as with other forms of harm and abuse, schools have a duty to protect children from it. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalized. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences, such as family, friends, or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.
49. **The Prevent Duty**, as it is known in the UK, applies to a wide range of public-facing bodies, including schools, and legally obliges them to have “due regard to the need to prevent people from being drawn into terrorism”. While this is not a legal obligation in Malaysia, it will be good practice to consider it in equivalent terms. The advice of the UK government can be found here:

[Revised Prevent Duty guidance for England and Wales](#)

This guidance requires schools, amongst other things, to train staff so that they can identify children at risk of being drawn into terrorism and challenge extremist ideas. At Charterhouse Malaysia, this responsibility will rest with the DSL at each campus. In general terms, children at risk of radicalisation may seek to hide their views, or display different signs. A few possible examples:

- A conviction that their religion, culture, or beliefs are under threat and treated unjustly
- A tendency to look for conspiracy theories, and a distrust of mainstream media
- A sense of debt or guilt
- Blaming parents for family problems
- Feeling let down, and perhaps ‘religious seeking’
- Peer pressure, low self-esteem, and/or the need for identity and belonging
- Physical change/growth spurt (being bigger than peers)
- Being secretive about who they have been talking to online and what sites they visit
- Switching screens when you come near the phone or computer
- Possessing items – electronic devices or phones – not given to them by parents or school
- Becoming emotionally volatile

In addition, our schools will employ a risk assessment for students being drawn towards terrorism or extremist ideas, and members of staff are required to have a general understanding of the risks affecting children in the area, recognising that in Malaysia, the range of possible opportunities for radicalisation will be strongly affected by local circumstances. The school is also required to ensure that students are safe from terrorist and extremist material when using our internet facilities. We are also required to build students’ resilience to radicalisation by promoting fundamental British values and enabling students to challenge extremist views.

50. **Reporting concerns under ‘Prevent** Anyone who has cause to believe that a young person has engaged with individuals or groups undertaking extremist activities, or is being taken out of the country for the

purpose of radicalisation, must inform the school leadership so that the appropriate reporting for that territory can be made.

### **Early Help Plans: ('Level Three' and 'Level Two') and universal support services ('Level One')**

51. The large majority of children are said to be at 'Level one', which is the lowest of the four Levels of Need, because they are developing and achieving outcomes as expected. As part of growing up, many of our students will have temporary crises to do with health concerns, family issues, academic worries or peer relationships. It is a key part of the role of all staff to look out for the welfare of students and to offer them and their families advice and information about support services that are universally and routinely open to all students.
52. Sometimes, despite the best efforts of individual colleagues, a child's temporary crisis goes on too long, or staff become concerned that the situation is getting worse. While it is clear that the child is not 'in need' or 'at risk' to the extent that the local authority must intervene in family life, it is nevertheless obvious that the child is vulnerable in the sense that he or she may have physical or mental health needs, family difficulties, academic or behavioural issues which could escalate to become more serious and longer-term problems.
53. **Reporting these concerns:** when there is no suggestion at all of abuse or neglect, or of any of the other issues explained above under Level four, it is likely that staff will in the first instance raise their concerns with the student's House Tutor. In turn, the House Tutor should quickly, and in every instance, consult with the DSL or Deputy DSL to check whether (1) any concerns have been recorded about the same child and (2) whether the child requires an 'Early Help Plan'.
54. The purpose of an Early Help Plan is to improve the child's situation by formulating a response, coordinating the work of professionals and regularly reviewing progress. EHPs are only ever drawn up with the student's consent and the parents' agreement.
55. If the DSL, consulting with the school leadership, judges that the child's needs might best be met by including exterior services, the DSL will consult with the relevant local agency. When a local public agency is involved (beyond consultation) with an Early Help Plan, the child is said to be at **Level Three**.
56. Any concerns about the safety or welfare of a child, including an Early Help Plan or the record if any concerns raised and actions taken at Levels Two, Three, or Four, constitutes his or her 'child protection file'. The DSL is responsible for keeping these files securely and for fulfilling the school's duty to pass them on promptly to the future educational establishment of any student leaving Charterhouse Malaysia before the age of 18.
57. Where reasonable inquiries fail to identify the child's new school, or where the student moves into home-schooling the DSL will inform the relevant public authority. If there is a child protection plan in place, the DSL will ensure that the contact point of the relevant public agency as referred to in (Paragraph 55) above will be informed. Where a student with a child protection plan moves abroad, the DSL will consider contacting the Head Teacher of the new school to offer a report. The child protection files of students who remain at Charterhouse Malaysia until age 18 will ordinarily be kept securely for a further seven years before being destroyed.

### **What to do when a child discloses: procedure to follow**

58. In a safeguarding context it is essential that children are listened to and taken seriously. If a child (either as victim or third party) discloses to a member of staff anything relevant to any of the issues outlined above, he or she must not be promised that the matter will definitely be kept confidential and go no further. Instead, the adult should explain to the child that, depending on what is said, information may need to be shared with the DSL or others. The child should be reassured that the matter will be dealt with as confidentially as possible by caring, experienced people whose job it is to act in the child's best interests.
59. The member of staff should listen sympathetically and carefully to what the child has to say. Even if it is not immediately apparent to the adult, the child may have been struggling with this decision for weeks, and may have had to summon up tremendous courage to come forward. Some issues (for example, 'sexting') will be intensely personal, and will require extreme sensitivity and care in response. However uncomfortable the details. The adult should not stop the child mid-account and (for instance) say that the child needs to speak to someone else. The member of staff should not write notes while the child is speaking, as this can put unhelpful pressure on the child by formalizing the situation.
60. As a fundamental principle, children should be given a fair hearing and taken seriously. Even if, personally, the adult suspects the child's disclosure is implausible, fanciful, or malicious, the adult should continue to listen carefully, without betraying any hint of scepticism. Members of staff listening to disclosures from children should ask questions for basic clarification of the facts such as 'what?', 'when?', and 'where?' However, adults must not ask leading questions or invite the child to speculate, as this can significantly prejudice investigations and outcomes.
61. At the end of the disclosure, the adult should reassure the child that he or she has done the right thing, and offer a guarantee that the information will be taken seriously. The child should be advised that he or she will be kept informed of the progress of the disclosure, and his or her wishes and feelings taken into account in responding to the matter.
62. The child should also be advised not to discuss the matter with anyone else for the time being. No member of staff is in a position to tell a child not to speak to his/her parents, so children can only be advised about discretion and confidentiality in the broader community. However, if the subject of the allegation *is* a parent, the advice of the DSL, local authority, or police must be sought as a matter of urgency.
63. In rare cases of immediate danger, the adult will need to stay with the child. Members of staff should be especially aware that disclosures about peer-on-peer abuse put all of the young people involved, whether perpetrator or victims, 'at risk'. This means it is important to think carefully about what might happen when the child leaves the room, and to act quickly in sharing relevant information so that risk assessments and plans can be formulated.
64. Otherwise, as soon as the child has left, the member of staff must write, sign and date a full note of all that has been said. Safeguarding records may, depending on the data protection regulations in the territory in which the school is operating, be made available later for a child or parent who wishes to seek to read them. For this reason and others, members of staff should write down safeguarding concerns clearly and objectively, using the child's words wherever possible.
65. If the child is in serious danger, or a crime appears to have been committed, the police should be informed. If the child's disclosure contains an allegation against a member of Charterhouse Malaysia staff, the procedures in Part Three below should be followed. Otherwise, the DSL or Deputy DSL should

be notified immediately by phone or in person, and the disclosure passed on. Strict confidentiality must be maintained: the matter should not be discussed with anyone else at all, unless failure to do so would put the child at greater risk. The staff member should follow up within 24 hours to check that the report has been received and not victim of some oversight.

### **What to do if you feel your concerns are not being acted upon: whistleblowing**

66. A member of staff who has raised any kind of concern with the DSL, or directly with the local authority, should expect to be informed within one working day about the course of action being taken. Should that information not be forthcoming, staff should seek it out, pressing for reconsideration if they feel their concerns have not been addressed, or the child's situation is worsening. This is also a responsibility to protect the DSL or other party to whom a report is made: errors can occur in the best of all systems and the staff member taking the original report must make a check that the report has been followed up, recognising that when individuals are busy or under their own stress, errors are possible and colleagues must make checks to support each other.
67. A member of staff who has concerns about poor, inappropriate, or unsafe practice within the school's safeguarding regime should consider informing the Headteacher on site, or the Director of International Education, or pursuing the matter as outlined in the Charterhouse Malaysia 'Policy on Whistleblowing'.

### **Part Three: Concerns about, and allegations against, members of staff**

68. Charterhouse Malaysia has clear expectations about the manner in which members of staff should conduct themselves around children. Detailed guidance on these expectations is given in the Professional Conduct Policy, as well as in the job description on appointment. All staff must read a copy when joining Charterhouse Malaysia and given the process of review and redrafting, are recommended to re-read at least once a year.
69. Members of staff need to be aware that, under the Sexual Offences Act 2003, the UK legislation that is the basis of our definitions and practice, it is an "abuse of a position of trust", and thus a criminal offence, for someone working in a school to 'groom' or engage in sexual activity with a student aged under 18. The consent of the student (or the agreement of his or her parents) is irrelevant. Staff should also note that, under the Serious Crime Act 2015, it is a criminal offence for an adult to communicate with a child under 16 if the communication is sexual or intended to elicit a response which is sexual. A relationship between a member of staff and a student over the age of 18, or a recent former student, is almost certain to be judged inappropriate by the School, and will lead to an assessment of that member of staff's suitability for work in an educational context.
70. There is a distinction between 'allegations' about the behaviour of staff in schools, and 'concerns' about their conduct. Taking our lead from the definitions adopted by Charterhouse UK, Charterhouse Malaysia will identify an allegation as existing if it is suspected or alleged that any member of staff, including volunteers, has:
  - Behaved in a way that has harmed a child, or may have harmed a child; or
  - Possibly committed a criminal offence against, or related to, a child; or
  - Behaved towards a child in a way that indicates he or she may pose a risk of harm to children.



However, in practice, most of the issues raised about the conduct of colleagues relate to minor indiscretions or questionable professional practices and can be termed 'concerns', in the sense that they warrant a constructive response, but fall short of the formal definition of an 'allegation' above.

71. All staff working at Charterhouse Malaysia are to be trained to raise both allegations and concerns, however apparently minor, and not to ignore them, cover them up, or delay reporting them. All students are to be taught the same thing and all parents are encouraged to do likewise. It is to be made clear to all staff that, where the welfare of children is concerned, it is not their job to investigate, or to address matters personally, or to make judgements about the character of colleagues, or to decide what ought and ought not to matter in a school: it is their job to share allegations and concerns appropriately.
72. A colleague who becomes aware of an allegation or concern involving a former member of staff or a former student should pass it to the DSL of the campus where the behaviour under question occurred. The DSL will then check the existence of other relevant records before promptly informing the Headteacher on site, who will in turn inform the DoE. If it appears that a crime has been committed, a crime report will then be made following the procedures of the territory in which the school is operating. Members of staff who become aware of allegations involving former colleagues or former students must otherwise keep the matter wholly confidential.
73. All allegations and concerns about the behaviour of current members of staff towards children must be taken directly and immediately to the Headteacher on site at the school in question. They should not be circulated amongst other colleagues or discussed with them. If the subject of the concern or allegation is the Headteacher at the school in question, then the Director of International Education (DoE) must be informed. Staff who raise concerns about colleagues will be offered timely confirmation only that the issue has been addressed, but otherwise all colleagues should expect such matters to be handled by the smallest number of people possible and with complete professionalism and confidentiality. If that confirmation is not received in a timely fashion, it is reasonable, and supportive, for the member of staff to follow up and ensure the concern was received as intended.
74. If the Headteacher in consultation with the DoE, judges that the concern is valid but does not constitute an allegation, he may decide on (for example) further investigation, the provision of re-training, or a private reminder by a senior manager on safe working practice. Staff should be aware that written records of concerns and the resulting actions are kept securely by the Director of Human Resources and (where students are concerned) cross-referenced in the safeguarding records of the DSL at that campus. They may or may not be shared in references to future employers, at the discretion of the Headteacher on site in his or her capacity as referee.
75. If the Headteacher at Charterhouse Malaysia judges that a member of staff could pose an immediate risk to children, or could have committed a criminal offence, he or she should enlist the advice of the Charterhouse Asia legal team and may choose to contact the police following the procedures in Malaysia. A member of staff (including a school leader) must not be informed of an allegation against him or her until advice has been sought from the Charterhouse Asia legal team.
76. Procedures for handling an allegation of a criminal offence will vary from jurisdiction to jurisdiction and the Charterhouse Asia legal team should be consulted and involved in the process. While taking that consideration into account, the Headteacher on site will work with the DoE to ensure that as far as possible, compatible with local processes, the procedures laid out in Part four of Keeping Children Safe in Education are followed. In particular, the Headteacher will quickly inform all persons

concerned, principally the child, the child's parents, and the member of staff against whom the allegation has been made, (subject to agreement by the police in that location on the questions of timing and content of what is to be disclosed and to whom).

77. The Headteacher will otherwise make every effort to guard against unwanted publicity and to ensure confidentiality is maintained. The legal protections in place in the UK should be maintained, so preventing publication of any material that may lead to the identification of a teacher against whom an allegation has been made by (or on behalf of) a student. This applies up to the point that the teacher waives his/her right to anonymity, or is charged with an offence, or otherwise in accordance with the procedures in that jurisdiction.
78. Charterhouse Malaysia acknowledges that members of staff against whom allegations have been made will be in need of support themselves, and a duty of care is owed to them, especially if they appear to have behaved in accordance with guidance on professional conduct. In conjunction with the Director of Human Resources, in consultation with the DoE, the Headteacher at the school will undertake a formal evaluation of the likely effect upon the adult against whom the allegation has been made, with recommendations for support as appropriate.
79. The Headteacher may decide to suspend the member of staff while the matter is investigated by the appropriate authorities. A member of staff suspended in such a context may not enter the school site.
80. Ultimately, the Headteacher, in conjunction with the DoE, will decide upon one of five outcomes/ if the allegations is judged to have been (1) malicious, (2) false, (3) unsubstantiated, or (4) unfounded, a confidential record will be kept but the decision will not affect the member of staff's employment, and it will not be mentioned in any reference for employment elsewhere.
81. If the allegation is (5) substantiated, and the member of staff (whether employed, contracted, a volunteer or student) resigns or is asked to leave the school on the grounds that he or she:
  - Has harmed, or poses a risk of harm., to a child or vulnerable adult; or
  - Has received a caution or conviction for a relevant offence; or
  - Is reasonably believed to have committed a listed relevant offence; or
  - Has been removed from working (paid or unpaid) in regulated activity;

Then the Headteacher, working with the DSL, the Director of Human Resources, and the DoE, will notify the relevant international accrediting agencies (eg COBIS) and also the Disclosure and Barring Service at PO Box 3963, Royal Wootton Bassett, SN4 4HH.

82. 'Ceasing to use a person's services' includes:
  - Dismissal;
  - Non-renewal of a fixed-term contract;
  - No longer engaging or refusing to engage a supply teacher provided by an employment agency;
  - Terminating the placement of a student teacher or other trainee or intern;
  - No longer using staff employed by contractors;
  - No longer using volunteers;
  - Voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

Charterhouse Malaysia will not enter into settlement or compromise agreements to prevent a referral being made to the DBS or other appropriate agencies. Charterhouse Malaysia will refer to

substantiated allegations in any reference provided for employment involving children or vulnerable adults.

83. Where a member of the teaching staff has been dismissed (or would have been dismissed if he/she had not resigned), then the Headteacher, working with the Director of Human Resources and the DoE, will consider whether or not to refer the matter to the Teaching Regulation Agency of the UK for UK background teachers, or parallel agencies, depending on the national background of the member of staff in question.
84. At the end of this process, the question “What lessons can be learned from this?” will be asked and a report prepared in partnership with the DoE to arrive at specific recommendations on improving procedures and practice, and implementing them promptly, will be prepared.

#### **Part Four: The Management of Safeguarding and Child Protection**

85. Charterhouse Malaysia will ensure that:

- The schools will comply with all duties under legislation in Malaysia and in particular, will ensure that the policies, procedures, and training at Charterhouse Malaysia are effective and comply with the relevant local law at all times;
- At each school, there will be a member of the governing body of that school, with responsibility for oversight of safeguarding and child protection arrangements within the school;
- A senior member of staff will be appointed from the school’s leadership team to take on the role of ‘DSL (‘Designated Safeguard Lead’), and that the DSL’s lead responsibility for safeguarding and child protection is made explicit in the role-holder’s job description. A Deputy DSL will also be appointed and at each school, it will be the case that at least one of these two post-holders will be a mother-tongue fluent speaker of the local language.
- There are appropriate policies and procedures in place to support appropriate action being taken in a timely manner to safeguard and promote children’s welfare; and that these policies include an effective safeguarding and child protection policy, a whistleblowing policy, and a professional conduct policy for staff.
- The policies, together with Part One and Annex A of *Keeping Children Safe in Education*, and information on the role of the DSL, are provided to all staff on induction with a proportionate approach (in the local language where sensible to do so) provided to temporary staff and volunteers.
- The practice and assessment criteria of Charterhouse UK, in turn taken from Surrey County Council’s practice and assessment criteria (‘Levels of Need’) are understood and built into the safeguarding policies and procedures of all Charterhouse Malaysia.
- The wishes and feelings of children are taken into account when determining what action to take and what services to provide, and that Charterhouse Malaysia has systems in place for children to express their views and give feedback.
- The safeguarding and child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in children with disabilities and special educational needs.
- The safeguarding and child protection policy includes procedures to minimise the risk of peer-on-peer abuse, reflects the different gender issues that can be prevalent in it, and sets out how allegations of peer-on-peer abuse will be investigated and dealt with.
- Charterhouse Malaysia has in place an appropriate safeguarding response to the possibility of children going missing from education.

- At induction, all staff members undergo safeguarding and child protection training (including online safety) in accordance with the requirements of *Keeping Children Safe in Education* (which includes the Charterhouse Policy on 'Promotion of Good Behaviour') and that thereafter, staff safeguarding training (within which online training is fully integrated) is regularly updated, in line with developments at Charterhouse UK/
- There is a 'whole school' approach to safety at each school, including a clear policy on the use of mobile technology in the school; and that appropriate IT filters and monitoring systems are in place to help safeguard students from potentially harmful or inappropriate online material;
- Students are taught about safeguarding, including online safety, as part of the provision of a broad and balanced curriculum;
- Personal information will be kept securely and will be processed fairly and lawfully, and staff will have due regard to the special condition under which practitioners may share information concerning the safeguarding of children and individuals at risk;
- Charterhouse Malaysia applies a 'Safer Recruitment Policy' and prevents people who pose a risk of harm from working with children by referring to the responsibilities in Part Three of *Keeping Children Safe in Education* and taking full background checks through the use of appropriate agencies, including, but not necessarily limited to, the International Child Protection Certificate administered through COBIS, and ensuring that volunteers are appropriately supervised;
- Charterhouse Malaysia has in place procedures to manage concerns about and allegations against teachers (including the senior leadership), volunteers, and other staff, in line with the responsibilities outlined in Part Four of *Keeping Children Safe in Education*.
- Where an allegation against a member of staff is judged to be substantiated, the school works to determine whether there are any improvements to be made to its procedures or practice to help prevent similar events in the future.
- A review of Charterhouse Malaysia's safeguarding and child protection policy is undertaken annually, together with an annual review of the effectiveness of its procedures and their implementation.

86. The Designated Safeguarding Lead (DSL) will:

- Take lead responsibility for safeguarding and child protection at Charterhouse Malaysia, including online safety. The DSL will be a member of the senior leadership team at each school and will have the status, authority, funding, training, resources, and support to carry out the duties of the post as detailed below. The lead responsibility itself will not be delegated, although some activities will be delegated to the Deputy DSL, who will be trained to the same standard. If the DSL is not a mother tongue fluent speaker of the language of the territory of the school, then the Deputy DSL must be.
- Act as a point of contact and liaise closely with the relevant local agencies, referring cases of suspected abuse in line with local procedures and ensuring that where, or if, any discrepancy exists between local expectations and those outlined in this policy, Charterhouse Malaysia remains consistent to the standards laid out herein.
- Liaise with the Headteacher on site to inform him or her of any ongoing issues and, as required, liaise with the relevant authorities in cases which concern a member of staff.
- Liaise with staff on safeguarding matters (including online and digital safety), and when deciding whether to make a referral.
- Act as a source of advice and expertise for all staff on safeguarding and child protection matters, and support those staff who make their own referrals or who are required to take part in meetings with external agencies.

- Maintain an overview of safeguarding within the school, and monitor the effectiveness of policies and procedures in practice, and ensure that it is known, understood, and used appropriately.
- Participate in the annual review of the Safeguarding and Child Protection Policy at a gathering of DSLs, Deputy DSLs, and the DoE.
- Ensure that the safeguarding and child protection policy is available publicly and that parents are aware of how the policy may be accessed and of the school's role in relation to the public authorities.
- Maintain a register of training undertaken by staff and ensure that all staff have undergone the levels of training relevant to their roles as outlined in Appendix 2 below.
- Ensure that when students leave the school, their child protection file is transferred to the new school or college as soon as possible, and that files are transferred separately from the main student file, secure transit is ensured, and confirmation of receipt is obtained.
- Consider whether it would be appropriate to share in advance any other information with the new school or college; for example, information which would allow it to have appropriate support in place for when the student arrives.
- Ensure that adequate and appropriate cover arrangements are made when either the DSL or the Deputy DSL is out of school, and for any out of hours or out of term activities.

87. The DSL and Deputy DSL will:

- Undergo training to provide them with the knowledge and skills required to carry out the role. This training to be updated at least every two years. For the DSL at least, this will include COBIS training for Designated Safeguarding Leads and this may entail travel outside term-time.
- Refresh their knowledge and skills at regular intervals, but at least annually (in addition to the formal training referred to in the previous paragraph).
- Ensuring each member of staff (especially new and part-time staff) has access to and understands the school's safeguarding and child protection policy and procedures.
- Being alert to the specific needs of 'children in need', those with special educational needs and young carers.
- Understanding the provisions of the relevant data protection regulations in operation in the jurisdiction where they are based.
- Being able to keep detailed, accurate, secure written records of concerns and referrals.
- Understanding the requirements of the Prevent duty and being able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Understanding the risks associated with online safety and being confident that they have the up-to-date knowledge required to keep children safe whilst they are online at school.
- Recognising the additional risks that children with SEN and disabilities face online and being confident that they have the capability to support SEND children to stay safe online.
- Obtaining access to resources and attending any relevant or refresher training course.
- Encouraging among all staff a culture of listening to children and, in any measures the school may put in place to protect them, taking account of their wishes and feelings.

88. Where staff training is concerned, the DSL will ensure that:

- All new members of staff (including temporary staff and volunteers) are provided with the following on induction: this safeguarding and child protection policy; the school's professional conduct policy; the school's whistleblowing policy; Part One and Annex A of *Keeping Children Safe in Education*; and information on the identity of the Designated Safeguarding Lead and Deputy.

- All new members of staff are trained in line with COBIS/EduCare to, at the minimum, have completed the course *Child Protection for International Schools*.
- All governors read, and re-read in the event of updates by the UK government, at least Part One and Annex A of *Keeping Children Safe in Education* and an introduction is provided in person to the Safeguarding and Child Protection policy.
- As part of the 'Prevent' duty, all staff undertake the Channel online general awareness training and develop the knowledge and confidence to identify children at risk of being drawn into terrorism, to challenge extremist ideas, and to know how to refer children and young people for further help.
- All staff are helped to understand their safeguarding responsibilities via regular refresher training as required. This will include staff responsibilities under Part One and Annex A of *Keeping Children Safe in Education*, online safety, the 'Prevent' duty, the management of peer-on-peer abuse allegations, and the importance of listening to children. In line with COBIS guidance, refresher training will be undertaken regularly. 'Understanding' safeguarding responsibilities will include making special provision for members of staff whose first language is not English.

## Annexes and Appendices

NB Two good sources of further information on all aspects of child abuse and neglect, including warning indicators (and the source for much of the information in the Annexes below) are the UK government's booklet, [What to do if you are worried a child is being abused](#) (March 2015) and [preventing abuse on the NSPCC website](#).

### Annex 1: Physical Abuse

The following injuries and behaviours are often associated with physical abuse:

- **Bruising:** children often have accidental bruising, but this is usually to the 'hard' areas of the body over bones (eg. knees, shins). Staff should be alert to bruising on the 'soft' areas of the body and on the head, which is the most common location for abusive injuries in children. The following must be considered non-accidental unless the evidence or explanation is wholly satisfactory:
  - Two simultaneously bruised eyes, without bruising to the forehead (rarely accidental)
  - Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
  - Bald patches, a bruised scalp, and/or swollen eyes from hair being pulled violently
  - Variation in colour possibly indicating injuries caused at different times
  - Clusters of bruises on the upper arm, outside of the thigh or on the body
  - Bruises in the shape of a hand or object, eg. Belt marks, finger rings, hand prints or a hairbrush.
  - Bruising or tears around, or behind, the ear lobe/s indicating injury by pulling or twisting
  - Bruising around the face
  - Bruises with dots of blood under the skin
  - Defensive wounds, commonly on the forearm, upper arm, back of the leg, hands or feet
  - Bruising on the arms, buttocks, and thighs, may be an indicator of sexual abuse
- **Burns and scalds** can be caused by hot liquids, hot objects, flames, chemicals, or electricity. It can be difficult to distinguish between accidental and non-accidental burns and scalds. They will always require experienced medical opinion. Any burn with a clear outline may be suspicious, for example:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds with upward splash marks or that have a line indicating immersion or poured liquid (a child voluntarily getting into hot water will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation
- **Bite marks** can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought when there is any doubt over the origin of the bite.
- **Fractures** may cause pain, swelling, and discoloration over a bone or joint. Non-mobile children rarely sustain fractures. There are grounds for concern if:
  - A large number of scratches, scars, or scars of different sizes or ages, or on different parts of the body, may suggest abuse
  - The effects of poisoning such as vomiting, drowsiness, or seizures
  - Respiratory problems from drowning, suffocation, or poisoning
- **Scars and other physical symptoms**
  - A large number of scratches, scars, or scars of different sizes or ages, or on different parts of the body, may also suggest abuse
  - The effects of poisoning such as vomiting, drowsiness, or seizures
- **Parents and Carers**
  - Parents or carers who are apparently evasive, uninterested, or undisturbed by an accident or injury
  - A child who repeatedly presents (or is presented by a parent/carer) with minor injuries; this may represent a “cry for help” and if ignored could lead to a more serious injury
  - Family use of different doctors and A&E departments

## **Annex 2: Emotional Abuse**

### **A parent, carer, or peer can emotionally abuse by:**

- Humiliating or constantly criticising a child
- Threatening, shouting at a child, or calling them names
- Making the child the subject of jokes or sarcasm
- Blaming or scapegoating a child
- Persistently ignoring a child or remaining cold and emotionless
- Failing ever to say anything kind, express positive feelings, or congratulate a child on success
- Making a child perform degrading acts
- Not recognising a child’s own individuality; trying to control his or her life
- Pushing a child too hard or not recognising their limitations
- Exposing a child to distressing events or interactions such as domestic abuse or drug taking
- Preventing or manipulating a child’s friendships

## Recognising Emotional Abuse

Emotional abuse is difficult to define, recognise and prove. The indicators are often also associated with other forms of abuse, and the signs in children are usually behavioural rather than physical:

- Delay in emotional or physical development
- Weak school performance
- Poor, fearful, or clinging attachment to a significant other person
- Neurotic behaviour (e.g. Rocking, hair-twisting, thumb-sucking)
- Self-harm, eating disorders, suicidal ideation
- Aggressive or destructive behaviour
- Frozen watchfulness, particularly in young children
- Low self-esteem and lack of confidence
- Withdrawal, solitariness, difficulty in relating to others

## Annex 3: Sexual Abuse

When young people engage in sexual activity with other young people, the boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate, or abusive, will hinge around the related concepts of true consent, power imbalance, and exploitation. It may involve children and young people who exhibit a range of sexually problematic behaviours such as indecent exposure, obscene telephone calls, fetishism, bestiality, and sexual abuse against adults, peers, or younger children.

**Developmental sexual activity** encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and the seeking of consent.

**Inappropriate Sexual Behaviour** can be either inappropriate socially, or inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, or physical damage. It may also be that the behaviour is “acting out” which derives from other sexual situations to which the child or young person has been exposed. However, boys and girls of all ages may also be sexually abused by adults, as well as by other people. Whatever the source of the abuse, the children are frequently too scared to say anything due to guilt and fear. It is particularly difficult for a child to talk about and full account should be taken of any cultural sensitivities.

Recognition can be difficult, unless the child discloses and is believed. There are a variety of physical symptoms, including pregnancy, sexually transmitted infection, and anal or genital soreness, but there may well be no physical signs meaning that indications are likely to be emotional or behavioural. Children who are sexually abused may:

- Stay away from certain people
- Avoid being alone with peoples, such as family friends or friends
- Seem frightened of a person or reluctant to socialize with him or her
- Self-harm (including eating disorders), self-mutilate, or attempt suicide
- Show sexual behaviour that is age-inappropriate
- Become sexually active or promiscuous at a young age



- Use sexual language or know information that they would not normally be expected to know
- Present with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

#### **Annex 4: Neglect**

- **Parents or Carers**

Neglect may occur during pregnancy. Once a child is born, neglect may involve:

- Physical neglect: when parents or carers leave a child dirty, or keep a child in a home which is indisputably dirty; fail to provide for a child's basic needs, such as food, clothing, or shelter (including exclusion from the home or abandonment); fail to adequately supervise a child, or provide for his or her safety (this includes the use of inadequate care-givers, and exposing children to dangerous conditions such as drugs, alcohol, and violence)
- Educational neglect: failing to ensure a child receives an education
- Emotional neglect: failing to meet a child's needs for nurture and stimulation, perhaps by ignoring, humiliating, or isolating him or her (this can be hard to prove).
- Medical neglect: failing to provide appropriate health care, including dental care – and refusal of care, or ignoring medical recommendation.

- **Children**

Evidence of neglect is built up over a period of time, and can include a variety of behaviours, for example:

- A child who seems to be listless, unresponsive, or constantly tired, with no apparent medical cause
- A child who fails to grow within the normal expected pattern, with accompanying weight loss
- A child who thrives away from the home environment
- A child who is often angry and aggressive, or who self-harms

#### **Appendix 1:**

All staff are expected to complete the Educare Basic Child Protection in International Schools course offered online by EduCare. Further information about courses offered by EduCare can be found [here](#) and in consultation with the DSL at each campus.

#### **Appendix 2: Key Contact Information:**

- **Talian Kasih 15999 (Formerly Childline Malaysia)**

This helpline is for abused or lonely children, as well as a helpline for reporting cases of abuse.

- **Department of Social Welfare Malaysia, Ministry of Women, Family and Community Development**

Tingkat 21-24  
Menara Tun Ismail Mohamed Ali  
Jalan Raja Laut  
50562 Kuala Lumpur, Malaysia  
Tel : 603 - 2697 1090  
Website : [www.jkm.gov.my](http://www.jkm.gov.my)

- **Jabatan Kebajikan Masyarakat Negeri Selangor**

Selangor Social Welfare Department  
Jabatan Kebajikan Masyarakat Selangor,  
Tingkat 2,  
Bangunan Darul Ehsan, No 3,  
Jalan Indah, Seksyen 14,  
40000 Shah Alam, Selangor.  
03-55445415  
jkm@selangor.gov.my

*Policy Drafted for Charterhouse malaysia by Tom Robinson*

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