



# CHARTERHOUSE MALAYSIA

<b>Policy:</b>	Safeguarding and Child Protection Policy		
<b>Approval Date:</b>	<i>Updated – 23<sup>rd</sup> February 2026</i>	<b>Next review:</b>	<i>August 2026</i>
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<b>Ownership:</b>	Designated Safeguarding Lead	<b>Derived From:</b>	Charterhouse UK

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Policy Owner	Designated Safeguarding Lead (DSL)
Derived From	Charterhouse UK Safeguarding and Child Protection Policy (Current)
Regulatory Alignment	Keeping Children Safe In Education (KCSIE - 2025); Malaysian Child Act: 611 (2001); Malaysian National Child Protection Policy (2009) Malaysian Sexual Offences Against Children Act (2017); National Minimum Standards for Boarding (UK - 2022) COBIS Independent Schools Inspectorate (ISI) Handbook
Approval Date	23 February 2026
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Review Cycle	Annual
Scope	Charterhouse Malaysia (School and Boarding; on-site and off-site activities)
Publication	Website and Staff Handbook / Intranet

**Key Personnel and Contact Details**

Role	Name	Contact
Designated Safeguarding Lead (DSL) & Head Of Secondary	Nikki Smith	nikki.smith@charterhouse-htms.edu.my
Deputy DSL (DDSL), Head of Pastoral & Head of Boarding	Emilie Eymin	emilie.eymin@charterhouse-htms.edu.my
Deputy DSL (DDSL) & Hea of Sixth Form	Andrew Irwin	andrew.irwin@charterhouse-htms.edu.my
Headteacher	Jo Evans	jo.evans@charterhouse-htms.edu.my
Chair of Governors	Haizam Syed	syedhaizam@tuascp.com
Link Governor for Safeguarding	Katharine Fowler	katherine.fowler@epsomcollege.edu.my

In an emergency where a child is at immediate risk of harm, contact the DSL/DDSL immediately and call emergency services where appropriate (Malaysia: 999).

**1. Introduction and Policy Aims**

Safeguarding and promoting the welfare of children is everyone's responsibility. Charterhouse Malaysia is committed to creating a safe, supportive and respectful environment in which all children can learn, flourish and thrive. Our approach is child-centred and rooted in Charterhouse values: integrity, respect, kindness, courage and service

to others. We expect all staff to maintain a culture of vigilance—thinking ‘it could happen here’—and to act promptly and professionally whenever there is a concern.

This policy sets out:

- the safeguarding and child protection principles that guide our practice;
- the legal and regulatory framework that applies in Malaysia and our alignment to UK best practice (KCSIE 2025);
- roles and responsibilities (staff, DSL team, Headteacher, governors and proprietors);
- procedures for reporting, responding to and recording concerns about children;
- procedures for concerns and allegations relating to adults working with children (including low-level concerns);
- the school’s approach to safer recruitment, training, online safety, peer-on-peer abuse, contextual safeguarding and boarding;

It includes:

- appendices describing types of abuse, indicators and specific safeguarding concerns.

## 2. Scope

This policy applies to all students under 18 and to all adults working with or on behalf of Charterhouse Malaysia, including: teaching and support staff; governors; volunteers; contractors; peripatetic staff; coaches; visiting professionals; tutors; work-experience students; and any third-party provider delivering activities on or off-site.

This policy applies during the school day, outside normal hours, on trips and visits, in all activity related to boarding and during any school-organised activity including holidays and camps where children are in our care.

## 3. Key Definitions

KCSIE defines **Safeguarding** as the process for protecting children from harm and abuse, whether that is within or outside the home, as well as online.

This includes:

- Providing help and support to meet the needs of children as soon as problems emerge • Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children’s mental and physical health or development • Making sure that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

**Child Protection** is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**Child:** In Malaysian and UK practice, a child is any person under the age of 18. Safeguarding: the action taken to promote the welfare of children and protect them from harm, including prevention, education, safe recruitment, culture and systems.

**Public authorities:** relevant Malaysian statutory agencies and services, including (as appropriate) the Department of Social Welfare (Jabatan Kebajikan Masyarakat, JKM), the Royal Malaysia Police (PDRM), healthcare services, and other governmental bodies.

#### 4. Legal and Regulatory Framework

This policy is derived from Charterhouse UK safeguarding policy and reflects UK best practice, including Keeping Children Safe in Education (KCSIE) 2025, Working Together to Safeguard Children, and (for boarding) the Boarding Schools: National Minimum Standards. It is adapted for the Malaysian context and is compatible with, and implemented in accordance with, Malaysian legislation and national policy, including: the Child Act 2001 (Act 611), the Sexual Offences Against Children Act 2017, and the National Child Protection Policy.

As a British international school, Charterhouse Malaysia is committed to COBIS safeguarding expectations and to maintaining procedures that are clear to staff, parents and students and readily demonstrable to inspectors.

#### 5. Related and Linked Policies

This policy must be read alongside the following school policies and procedures (as applicable):

- Safer Recruitment Policy;
- Staff Code of Conduct / Professional Conduct Policy;
- Whistleblowing Policy;
- Behaviour Policy (including sanctions and rewards);
- Anti-Bullying Policy;
- Online Safety / Acceptable Use Policy;
- Health and Safety Policy;
- Educational Visits and Trips Policy (including risk assessment);
- Boarding Handbook and Boarding Safeguarding Procedures;
- SEND / Inclusion Policy;
- First Aid and Medical Policy;
- Data Protection and Record Retention Policy;
- Grievance / Complaints Procedure.

## 6. Roles and Responsibilities

### 6.1 All Staff, Volunteers and Contractors

All adults working with children have a duty to safeguard and promote the welfare of children. All staff must:

- read and understand this policy, KCSIE 2025 Part One (and relevant annexes), and the Staff Code of Conduct;
- complete safeguarding training on induction and receive regular updates;
- know how to recognise abuse, neglect and specific safeguarding issues;
- report concerns immediately via CPOMS and, where urgent, directly to the DSL/DDSL;
- never investigate concerns themselves or promise confidentiality to a child;
- maintain appropriate professional boundaries at all times;
- understand the low-level concerns process and report concerns about adults promptly;
- follow the school's procedures for online safety, trips, boarding, and managing peer-on-peer concerns.

### 6.2 Headteacher

The Headteacher has overall responsibility for ensuring that safeguarding arrangements are effective, compliant and embedded in the culture of the school, including: resourcing the DSL function; ensuring safer recruitment; ensuring distribution of all safeguarding related policies and procedures and appropriate staff training; ensuring parents and guardians are aware of this policy and where they can access a copy; acting on allegations against staff; taking legal action where required; and reporting appropriately to proprietors/governors and relevant authorities.

The Head will make the final decision regarding all low-level concerns or allegations against adults.

### 6.3 Designated Safeguarding Lead and Deputy DSLs

The DSL takes lead responsibility for safeguarding and child protection (including online safety). Nikki Smith has the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL is a senior member of staff from our school's leadership team. Charterhouse Malaysia has 2 Deputy DSLs to support the DSL in her role. The DSL liaises closely with the Headteacher, Managing Director and Chairs of the Board of Governors/ Safeguarding Governing Link, and acts as the primary contact with local safeguarding agencies. While the DSL may hand over some activities to a deputy, the DSL will always have the ultimate responsibility for keeping children safe.

#### The Deputy Designated Safeguarding Lead(s):

- Will be trained to the same standard as the DSL and the role is explicit in their job description.
- Will take on the designated safeguarding lead's responsibilities if they are unavailable. If the designated safeguarding lead is long-term absent, a deputy will temporarily take over as the designated safeguarding lead.

#### The DSL and DDSLs:

- make sure that all staff have access to this policy (and the wider safeguarding procedures) and that all staff have declared they have read it alongside KCSIE, as required, on an annual basis
- make sure that all adults who work in or for the school have an adequate and appropriate safeguarding induction, regularly updated safeguarding training and annually sign to say they have read the relevant part of KCSIE;
- lead student and parent training, as appropriate, and safeguarding updates;
- have the lead responsibility for online safety, including oversight and checking the effectiveness of the school's filtering and monitoring systems and their reports;
- work closely with boarding leadership to ensure safe practice in residential settings;
- lead and oversee the assessment and triage of children, using a graduated response and a child-centred approach, including taking part in and/or supporting staff to take part in strategy discussions, child protection conferences and meetings between multiple agencies;
- provide advice, expertise and support to staff, working together to understand the whole picture when there are safeguarding concerns
- manage referrals to public authorities (JKM/PDRM/health services) as required;
- maintain secure records and oversee information-sharing;
- ensure appropriate support is provided to children and families;
- keep the Head and Safeguarding Governors up to date with safeguarding issues;
- monitor patterns (including low-level concerns, peer-on-peer incidents, and contextual risks) and implement improvement actions;
- make sure child protection files are up to date and ensure transfer of safeguarding files when pupils change school;
- participate in an annual review including the Headteacher, Charterhouse Asia and Board of Governors. Policy reviews must consider student feedback, low-level concerns and statutory changes from both Malaysian and UK guidance.

#### **6.4 Proprietors / Governing Body and Safeguarding Governor**

The Governing Body and proprietors ensure there are effective safeguarding policies and arrangements in place, that they are implemented and reviewed, and that safeguarding is a standing item at board/governor meetings. A nominated Safeguarding Governor meets termly with the DSL to provide oversight, challenge and support and to ensure evidence is available for inspectors.

All members of the Governing Body understand and fulfil their responsibilities to ensure that:

- Safeguarding, and the child's best interests, wishes and feelings are considered in everything the school does. Everyone at the school is involved in the whole school approach to safeguarding and online safety is a theme throughout;
- The school's policies, procedures and training follow the law
- The school's leadership team are held to account for the school's safeguarding arrangements;
- The appointed designated safeguarding lead (DSL) is given the additional time, funding, training, resources and support needed to carry out the role effectively;
- An experienced governor takes leadership responsibility for the school's safeguarding arrangements.
- There are effective safeguarding arrangements for when the site is being hired/let;
- All members of the governing board receive safeguarding training at induction, which is regularly

updated. Governors sign to say they have read and understood KCSIE and this policy;

- The chair of governors will manage any allegations against the Head.

## **7. What to Do if You Have Concerns About a Child's Welfare**

### **7.1 Immediate Danger or Risk of Significant Harm**

If a child is in immediate danger or is at risk of significant harm, take urgent action. In an emergency call Malaysia emergency services (999) and notify the DSL/DDSL or Headteacher immediately, in person. Any urgent action must be followed by recording the concern on CPOMS as soon as practicably possible.

### **7.2 Disclosures and Listening to Children**

We recognise that it takes a lot of courage for a child to disclose they are being harmed. Staff know that:

- Children may not feel ready or know how to tell someone they are being harmed.
- The child may not realise what is happening to them is harmful.
- They may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

Our staff know they must show professional curiosity, i.e. explore and try to understand what is happening for a child, rather than take what is being said on face value or making assumptions. We encourage staff to ask the child if they are OK or if they can help in any way. A child who makes a disclosure may have to tell their story more than once, such as to the police and social workers. At Charterhouse Malaysia, we know how important it is that a child's first experience of talking to a trusted adult about a worry is a positive one.

### **Handling a Disclosure**

If a child speaks to you about safeguarding matters, you must:

- explain that you cannot promise confidentiality and that you must pass the information to the DSL;
- Listen to them carefully and believe in what they are saying. Do not be afraid of silence moments.
- Be careful not to express your own views or feelings and stay calm.
- Do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a deputy.
- Only ask open questions, such as: How? When? Who? Where? and open statements, such as "Tell me," "Describe" and "Explain." Otherwise, you may invalidate your and the child's evidence in any later court proceedings.
- If there are injuries or marks on the child, do not examine the child intimately or take pictures.
- Reassure them that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner.

- Do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted.
- Tell the child it is not their fault, and you are taking them seriously.
- Explain what you will do next. Tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help.

### **7.3 Recording Concerns (CPOMS)**

All safeguarding and wellbeing concerns must be recorded on CPOMS. Staff must make entries as soon as possible, and in any event on the same day. High-risk concerns should be logged within four hours, tagging under the safeguarding category and escalated verbally to the DSL/DDSL.

- Record the date, time, place, and persons present during the disclosure
- Use the child's - or other persons from whom you are taking a statement - own words, verbatim where possible, and stick to the facts: what was seen/heard; who was involved; dates and times; context; any actions taken.
- Avoid making assumptions and do not put your own judgement on it.
- Record any noticeable non-verbal behaviour.
- Detail any visible marks or injuries and record them on a body map.
- Keep any original notes you have made on file, sign and date them.
- Do not ask children to make written statements themselves or sign records.

Do not share the disclosure with anyone else unless the DSL, police or another relevant agency involved in the safeguarding process tells you to. Get support for yourself if you need it.

### **7.4 Response Levels and Early Help**

Charterhouse Malaysia uses a graduated response informed by Charterhouse UK and UK safeguarding practice, adapted for Malaysia. Support ranges from universal pastoral care through targeted school support, to multi-agency intervention and statutory referral. The DSL will consider early help, pastoral plans, counselling, medical support and external agency involvement as appropriate.

## **8. Working with Parents and Carers**

We aim to work in partnership with parents and carers and will usually inform them when a safeguarding concern has been raised, and involve them in support plans. However, the school will not notify parents or seek consent if doing so would: increase risk to the child or another person; compromise a criminal investigation; lead to delay in protecting the child; or conflict with guidance from authorities.

## **9. Confidentiality, Information Sharing and Data Protection**

Safeguarding information is shared on a 'need to know' basis. Staff must not discuss safeguarding matters outside professional channels. There is no barrier to sharing information where failure to do

so would place a child at risk of harm. All decisions to share or withhold information are recorded, along with the rationale.

## **10. Record Keeping, Storage and Transfer of Safeguarding Files**

Safeguarding records are held securely within CPOMS and/or secured safeguarding files under the control of the DSL. Records are accurate, contemporaneous and kept separate from academic files. When a pupil moves school, the DSL will transfer safeguarding records securely and obtain confirmation of receipt.

## **11. Children Potentially at Greater Risk of Harm**

The DSL team will give additional consideration to children who may be more vulnerable, including:

- children with special educational needs and/or disabilities (SEND);
- children with identified health or mental health concerns;
- children experiencing family stress, domestic abuse, parental substance misuse or mental ill-health;
- children who are frequently absent or missing from education;
- children experiencing bullying, discrimination, or social isolation;
- boarders and students away from their usual support networks;
- children experiencing online harms or exploitation.

## **12. Child-on-Child Abuse (Peer-on-Peer)**

Charterhouse Malaysia recognises that children can abuse other children. This includes (but is not limited to) bullying, harassment, sexual violence, harmful sexual behaviour, hazing, initiation rituals, coercive control, online abuse and the sharing of nudes or semi-nudes. Such incidents are managed as safeguarding concerns and are not treated solely as behaviour issues.

The DSL will consider: the nature and severity; the ages and developmental stages; power imbalance; coercion; context; and ongoing risk. A risk assessment will be completed and a support plan put in place for both the child harmed and the child displaying harmful behaviour.

### **12.1 Sexual Violence and Sexual Harassment**

All reports are taken seriously. The school will follow KCSIE 2025 expectations for responding, including: immediate safety; supporting the victim; managing alleged perpetrator risk; avoiding victim-blaming; and deciding whether to refer to external authorities.

### **12.2 Sharing Nudes and Semi-Nudes (Youth Produced Sexual Imagery)**

Staff must not view, copy, forward or download any nude or semi-nude imagery. If nude or semi-nude imagery is discovered, staff must:

- secure the device where possible;
- inform the DSL immediately and follow the DSL's direction on next steps.

The DSL will decide actions in line with KCSIE and local law guidance, including whether to involve parents, police and/or other agencies, and how to ensure deletion and safeguarding support.

## 13. Online Safety and the Use of Smart Devices

Online safety is a core safeguarding priority. Charterhouse Malaysia uses a whole-school approach, combining education, policy, supervision and technical controls.

### 13.1 The 4Cs (Content, Contact, Conduct, Commerce)

- **Content:** exposure to harmful or age-inappropriate content.
- **Contact:** being contacted by adults/strangers, grooming, coercion and exploitation.
- **Conduct:** harmful behaviour online including bullying, harassment, image-sharing and hate speech.
- **Commerce:** financial exploitation, scams, and in-app purchases.

### 13.2 Filtering and Monitoring

The school maintains appropriate filtering and monitoring systems on its networks and devices, and reviews their effectiveness regularly. Safeguarding concerns arising from monitoring are handled proportionately and recorded via CPOMS.

### 13.3 Mobile Phones and Smart Technology

Student use of mobile phones and smart devices (including smart watches) is managed in line with the school's behaviour and online safety policies, with clear expectations, supervision, and sanctions where necessary. Any safeguarding concerns linked to device use must be reported.

### 13.4 Remote Education

Where remote learning is used, safeguarding standards apply. Staff must use approved platforms, maintain professional boundaries, and follow the school's remote education safeguarding guidance.

## 14. Mental Health and Wellbeing

Charterhouse Malaysia recognises the link between mental health and safeguarding. Concerns about self-harm, suicidal ideation, eating disorders or significant deterioration in wellbeing must be reported immediately. The DSL will coordinate support, including counselling and external referral where appropriate.

## 15. Extremism and Radicalisation (Contextual Safeguarding)

Radicalisation is a safeguarding concern. Staff must report any indicators of extremist influence or vulnerability, including online exposure. The DSL will assess risk and determine appropriate actions and referrals in line with our safeguarding framework and local context.

## 16. Children Missing Education and Attendance

Children missing education are at increased risk of harm. Attendance is monitored closely. Unexplained or persistent absence, patterns of lateness, or a child going missing from school/boarding must be reported to the DSL and recorded. The DSL will consider welfare checks, parent meetings, and referral pathways where risk escalates.

## 17. Domestic Abuse, Family Circumstances and Contextual Risk

The school recognises that children may be harmed in the home and community. Staff must be alert to signs of domestic abuse, family breakdown, parental mental ill-health or substance misuse, and homelessness or housing instability. Concerns must be reported and recorded, and the DSL will coordinate support and referrals.

## 18. Boarding Safeguarding

Boarding presents additional safeguarding considerations. Charterhouse Malaysia aligns its boarding safeguarding practice to the UK Boarding Schools: National Minimum Standards, adapted for Malaysia. This includes: safe recruitment for boarding staff; clear supervision structures; overnight procedures; visiting and leave permissions; safeguarding induction for boarders; and robust reporting routes.

Boarding staff must log safeguarding concerns on CPOMS and escalate urgently where required. The DSL works closely with boarding leadership to monitor patterns, manage risk assessments (including weekends and activities), and ensure students have regular opportunities to share their views about safety in boarding.

## 19. Trips, Lettings and Third-Party Providers

Safeguarding duties apply during educational visits, fixtures and off-site activities. Risk assessments must include safeguarding and supervision arrangements. Where third-party providers are used, the school requires evidence of safeguarding policies, staff vetting and safe practice aligned to Charterhouse expectations. Lettings and use of the site by external organisations must meet safeguarding requirements; where providers cannot assure standards, the activity will not proceed.

## 20. Concerns or Allegations About Adults in the School

Charterhouse Malaysia distinguishes between:

- **Allegations that meet the harm threshold** (a person has harmed a child; may have committed a criminal offence against a child; or behaves in a way that indicates they may pose a risk of harm).
- **Low-level concerns** (behaviour inconsistent with the Code of Conduct but not meeting the harm threshold).

### 20.1 Low-Level Concerns (KCSIE 2025)

Low-level concerns must be reported by email to the Headteacher and DSL. All reports will be recorded in CPOMS. Examples include: over-familiarity; inappropriate language; favouritism; poor boundaries; or any conduct that causes uncertainty or unease. The register is reviewed regularly to identify patterns and to take early action.

### 20.2 Allegations Meeting the Harm Threshold

Any allegation that may meet the harm threshold must be reported immediately to the Headteacher (or, if the allegation concerns the Headteacher, to the Managing Director / Safeguarding Governor). The Headteacher will seek guidance from Charterhouse Asia legal advisers and determine referral

routes to Malaysian authorities (JKM/PDRM) where appropriate. All decisions are recorded, and confidentiality is maintained in line with legal advice.

### **20.3 LADO Equivalent (Malaysia)**

Malaysia does not operate a Local Authority Designated Officer (LADO) system as in England. Charterhouse Malaysia therefore follows KCSIE expectations by establishing clear internal escalation procedures and by consulting legal advice to determine appropriate Malaysian statutory referral pathways. Where a crime is suspected, the police will be contacted.

### **20.4 Whistleblowing**

Staff are encouraged and expected to raise concerns about poor or unsafe practice. Staff who raise concerns in good faith will be supported and protected from detriment. Whistleblowing routes are published in staff materials and include the Headteacher, DSL, HR Director, and the safeguarding governor.

## **21. Safer Recruitment and Vetting**

Charterhouse Malaysia maintains robust safer recruitment procedures aligned to Charterhouse UK and COBIS expectations. This includes:

- clear role descriptions and safeguarding statements in advertisements;
- safer recruitment training for panel members;
- identity, right-to-work and qualification checks;
- scrutiny of employment history and explanations for gaps;
- at least two references, including from the current/most recent employer;
- criminal record checks (including DBS where applicable) and/or International Child Protection Certificates (ICPC) for overseas checks;
- prohibition checks and professional status checks where relevant;
- verification of safeguarding training;
- probation and induction with safeguarding training and monitoring.

## **22. Training and Staff Induction**

All staff, including temporary staff and volunteers, receive safeguarding training at induction and regular updates thereafter. Training includes: recognising abuse; reporting and recording; peer-on-peer abuse; online safety; professional boundaries; low-level concerns; and local referral pathways. The DSL and DDSLs undertake advanced training at least every two years and refresh their knowledge annually.

## **23. Teaching and Learning: Safeguarding Through the Curriculum**

Safeguarding is embedded within the curriculum and wider pastoral programme, including tutor time, assemblies and age-appropriate relationships, health and online safety education. We teach students about consent, respectful relationships, bullying and discrimination, digital citizenship, and how to seek help.

## 24. Monitoring, Review and Quality Assurance

The DSL undertakes regular safeguarding audits, including review of CPOMS data, concern patterns, training compliance, and site/boarding risk assessments. The safeguarding governor meets termly with the DSL and reports to the governing body. The policy is reviewed annually, or sooner in response to statutory updates or learning from incidents.

## 25. Malaysian Safeguarding Contacts and Referral Pathways

Key contacts (to be displayed in staff areas and made available to students and parents):

- **Emergency services: 999**
- **Royal Malaysia Police (PDRM) – local district police stations as appropriate**
- **Talian Kasih: 15999 (24-hour helpline) / WhatsApp: 019-2615999**  
A 24-hour helpline run by the Ministry of Women, Family and Community Development for individuals in distress, including children and young people.
- **Department of Social Welfare (JKM), Ministry of Women, Family and Community Development (Putrajaya/KL – as applicable)**  
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**  
Tingkat 2,  
Bangunan Darul Ehsan, No 3,  
Jalan Indah, Seksyen 14,  
40000 Shah Alam, Selangor  
Tel: 03-55445415/ Website: [jkm@selangor.gov.my](mailto:jkm@selangor.gov.my)

## Appendix A: Types of Abuse (Indicators and Guidance)

### A1. Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Indicators may include bruising to soft areas, patterned marks, burns with clear outlines, unexplained fractures, frequent injuries, and inconsistent explanations.

## **A2. Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Indicators may include low self-esteem, withdrawal, anxiety, self-harm, aggression, developmental delay, and fearfulness.

## **A3. Sexual Abuse**

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. It includes physical contact and non-contact activities including online exploitation. Indicators may include age-inappropriate sexual knowledge or behaviour, distress, avoidance, physical soreness, STIs, or pregnancy.

## **A4. Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. Indicators may include persistent hunger, poor hygiene, inadequate clothing, lack of supervision, untreated medical issues, frequent tiredness, and poor attendance.

# **Appendix B: Detailed Indicators of Abuse and Neglect (Expanded)**

## **B1. Physical Abuse – Expanded Guidance**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates symptoms of, or deliberately induces, illness in a child. Staff should be alert to both single incidents and patterns over time.

Common indicators may include (this list is not exhaustive):

- Bruising to soft tissue areas (cheeks, neck, abdomen, thighs, buttocks).
- Multiple bruises or injuries at different stages of healing.
- Patterned injuries (belt marks, handprints, bite marks, burns).
- Burns with clear outlines, immersion burns, or cigarette burns.
- Unexplained fractures or injuries inconsistent with the explanation given.
- Delay in seeking medical attention or inconsistent accounts.
- Fear of parents/carers or flinching when approached.

## **B2. Emotional Abuse – Expanded Guidance**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person.

- Persistent criticism, humiliation or rejection.

- Exposure to domestic abuse.
- Inappropriate expectations of a child relative to their age or development.
- Preventing a child from forming friendships or socialising.
- Terrorising a child or placing them in situations of fear.
- Emotional unavailability or neglect.

### **B3. Sexual Abuse – Expanded Guidance**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. It may involve physical contact or non-contact activities, including online exploitation.

- Sexual activity with a child under 16.
- Non-contact abuse such as sexualised online communication or grooming.
- Exposure to sexual imagery or pornography.
- Encouraging children to behave in sexually inappropriate ways.
- Sexual exploitation through coercion, manipulation or abuse of power.

### **B4. Neglect – Expanded Guidance**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development.

- Failure to provide adequate food, clothing or shelter.
- Lack of supervision or appropriate caregivers.
- Failure to ensure access to medical or dental care.
- Failure to ensure regular school attendance.
- Ignoring a child's emotional needs.

## **Appendix C: Specific Safeguarding Concerns (KCSIE 2025 aligned)**

The following issues are treated as safeguarding concerns and must be reported and recorded as appropriate:

- child-on-child abuse (including sexual violence and harassment)
- sharing nudes and semi-nudes
- child sexual exploitation (CSE) and child criminal exploitation (CCE)
- serious violence and gang-associated risks
- children who go missing from education, home or care
- mental health concerns (including self-harm and suicidal ideation)
- domestic abuse
- so-called 'honour'-based abuse and forced marriage (where relevant)
- modern slavery / trafficking

- online harms including grooming and coercion
- radicalisation and extremist influence (contextual safeguarding)
- fabricated or induced illness (FII)
- abuse linked to faith or belief

## **Appendix D: Specific Safeguarding Issues (UK KCSIE 2025 – Full Detail)**

- Child Criminal Exploitation (CCE): involvement in criminal activity including drug trafficking, carrying weapons, or financial exploitation.
- Child Sexual Exploitation (CSE): exploitative situations where a child receives something in exchange for sexual activity.
- Serious Violence: indicators such as unexplained injuries, weapons possession, or gang association.
- County Lines / Organised Crime (contextual risk in international settings).
- Children Missing Education, Home or Care.
- Domestic Abuse and its impact on children.
- Fabricated or Induced Illness (FII).
- Honour-Based Abuse and Forced Marriage.
- Female Genital Mutilation (FGM) – illegal and a form of abuse.
- Mental Health, self-harm and suicidal ideation.
- Online Abuse, Grooming and Exploitation.
- Radicalisation and Extremism.

## **Appendix E: Boarding Safeguarding – Extended Detail**

Boarding students require enhanced safeguarding arrangements due to the residential nature of provision. Charterhouse Malaysia aligns its boarding safeguarding practice with the UK Boarding Schools: National Minimum Standards, adapted for the Malaysian context.

- Clear supervision and staffing ratios at all times.
- Robust overnight procedures and on-call systems.
- Appropriate management of visiting and leave permissions.
- Separate accommodation for staff and students.
- Clear boundaries and code of conduct for boarding staff.
- Safeguarding induction for boarders.
- Regular pupil voice and welfare checks.
- Risk assessments for weekend activities and trips.

## Appendix F: Staff Quick Reference – What to Do

If you are worried about a child:

1. If a child is at immediate risk: call 999 and alert the DSL/DDSL immediately.
2. Listen, reassure, do not investigate, and do not promise confidentiality.
3. Record on MyConcern the same day (urgent cases within four hours).
4. Follow DSL instructions and continue to support the child appropriately.

If you are worried about an adult’s behaviour:

5. Report low-level concerns to the Headteacher/DSL and record as directed.
6. Report allegations meeting the harm threshold immediately to the Headteacher (or designated alternative if the Headteacher is implicated).
7. Do not confront the adult or discuss the matter with colleagues.

## Appendix G: Training Matrix (Minimum Expectations)

Minimum safeguarding training requirements:

Role	Training	Frequency
All staff (incl. contractors/volunteers)	Induction safeguarding, Code of Conduct, reporting via CPOMS, online safety, peer-on-peer abuse, low-level concerns	Induction + annual updates
DSL / DDSL	Advanced DSL training; multi-agency working; online safety; managing allegations; record keeping	Every 2 years + annual refresh
Governors	Safeguarding oversight and KCSIE Part One awareness	Induction + annual refresh
Boarding staff	Boarding safeguarding, supervision, overnight procedures, boundaries, reporting routes	Induction + annual updates
Trip leaders	Visit safeguarding and supervision; risk assessment; emergency and reporting procedures	Before visits + annual refresh

## **Appendix H: COBIS Inspection Cross-Reference**

This policy has been written to meet COBIS safeguarding expectations. Inspectors should find clear evidence of:

- A strong safeguarding culture and child-centred ethos.
- Clear DSL leadership and accountability.
- Robust reporting, recording and escalation procedures.
- Staff training and safer recruitment.
- Effective management of allegations and low-level concerns.
- Online safety, peer-on-peer abuse, and contextual safeguarding.
- Governance oversight and continuous review.