

# Safeguarding & Child Protection Policy

XCL Education Malaysia



<b>Approved by:</b>	[Anthony Partington]	<b>Date:</b> [30 Aug 2024]
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## Introduction

This policy will give clear direction to staff about expectations of, and our commitment to, safeguarding and promoting the welfare and wellbeing of all students at XCL Education Malaysia (XCL MY) family of schools. This policy applies to all students, staff, volunteers, outside providers and visitors.

As a British International school in Malaysia, offering the UK National Curriculum and a British school experience, this policy is in line with guidance, standards and documents operated and used by schools in the UK as well as meeting Malaysian law, expectations and standards.

References made within this policy to 'child' and 'children' relates to all children and young people under the age of 18 years. However, the principles apply to all students, including those over the age of 18 years. 'Child' should therefore be read to mean any student at XCL Education Malaysia family of schools.

References to 'adults' and 'staff' relates to all those who work in a paid or unpaid capacity in the school. This also includes those who visit the school e.g. CCA coaches, contracted outside providers, contractors etc.

## Philosophy

XCL Education Malaysia believes that it is the responsibility of everyone in our school, and on our campus site, to safeguard and promote the welfare and wellbeing of all students; supporting every student's development in ways that will foster security, confidence and independence.

XCL Education Malaysia takes a 'child centred' approach and the best interests of the student are always considered as paramount.

XCL Education Malaysia believes that all children, regardless of age, gender, ability, culture, race, language or religion, have equal rights to be protected and safeguarded.

XCL Education Malaysia recognises the importance of supporting students and staff involved in safeguarding issues appropriately.

## Aims of the Policy

- To ensure we safeguard students to the best of our ability using all our resources; preventing abuse, recognising signs and symptoms of abuse where possible and taking action where necessary.
- To support all XCL Education Malaysia family of schools' staff in understanding safe professional practice; enabling them to adhere to all safeguarding related policies and procedures.
- To ensure that XCL Education Malaysia family of schools provides an environment in which all students feel safe, secure, valued and respected, and feel confident and able to approach adults if they are in difficulty.
- To raise the awareness of all staff of the need to safeguard students and of their responsibilities in identifying and reporting possible cases of abuse or neglect.
- To ensure effective systems and processes to report, record and monitor students who are at risk of harm, in need or victims of abuse.
- To emphasise the need for clear communication between staff in cases of suspected abuse or need.
- To ensure that all adults (including external contractors, providers and visitors to the XCL Education Malaysia campuses) who have access to, or contact with students, have the relevant and appropriate checks in place, are recruited in a safe way, are offered training and updates and are clear about expectations and conduct regarding safeguarding.

## Malaysian Law

There are three main laws that cover child abuse in Malaysia: The Penal Code, the Sexual Offences Against Children Act 2017, and the Child Act 2001.

Malaysia's legislations regard the definition of a child in civil law to be a person below 18 years of age. Please note that for the purposes of Safeguarding and Child Protection, all persons undertaking activity as a student within XCL MY family of schools is classified as a child.

The age of criminal responsibility in Malaysia is 10. This is stated in statute under Section 82 of Malaysian Penal Code and Article 2 of the Child Act 2001.

Appendix 11 summarises the main points staff need to know about the laws in Malaysia relating to Child Abuse and the legal ages set by the Malaysian Government.

## Roles & Responsibilities

The **Campus Principal** will ensure:

- There are regular termly meetings for the Campus Safeguarding Committee. This includes taking the role of Chair and ensuring effective action through the group to monitor Safeguarding processes / procedures and effective systems.
- The Safeguarding Committee has representatives from across campus within it.
- Safeguarding remains a priority within the school and the school remains 'Students centred'.
- The Campus Principal is held to account in ensuring Safeguarding policies, procedures and systems are adhered to by all staff and are dealt with appropriately.
- The HR manager is held accountable in ensuring that staff are recruited in line with the Safer Recruitment Policy. See Safer Recruitment Policy and Appendix 8– Safer Recruitment Checklist.

The **Designated Safeguarding Lead (DSL)** will ensure:

- This policy, and all related Safeguarding Policies and procedures, are implemented and followed by all staff.
- DSLs, Deputy DSLs and CPO are named and allocated in sufficient number
- DSLs, Deputy DSLs and CPO have undertaken Advanced Safeguarding and Child Protection training and this training is kept up to date.
- Sufficient time and resources are available to enable the DSLs, Deputy DSLs and CPO to carry out their roles effectively.
- Appropriate support and supervision for DSLs, Deputy DSLs and CPO in order for them to carry out their role safely and effectively.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with this policy, the Whistleblowing Policy and in line with the Code of Conduct for staff.
- They provide a written termly safeguarding report to the Campus Principal outlining Child Protection case numbers, actions, training and trends / patterns emerging.

The **Deputy DSL's** will ensure:

- They attend the Safeguarding Committee meetings to discuss procedures, records, development, updates and training.
- This policy, and all related Safeguarding Policies / procedures, are implemented effectively and followed by all Staff, including external contractors, providers and visitors, who have access to students at the school.
- Opportunities to teach children about 'Keeping Safe', including online safety, are built into the curriculum,

and are consistently covered and updated in relation to emerging needs as well as developments in society and technology.

- They promote safeguarding across the school to ensure it is embedded in the environment and ethos, including encouraging a culture of listening to and taking into account the wishes and feelings of students.
- Staff feel able to raise concerns about poor or unsafe practice at the school and that such concerns are handled in accordance with this policy and the Whistle Blowing Policy.

The **DSL, Deputy DSL / CPO** (Child Protection Officer) will:

- Act as a first point of contact for staff on issues of safeguarding and child protection.
- Fully investigate any reported safeguarding concerns in line with the school's procedures.
- Inform the Executive Principal/ Vice Principal Welfare and Safeguarding of all suspicions of Grooming, Abuse or Domestic Violence and wherever they feel the Staff Code of Conduct is not being followed.
- Ensure implementation of this policy, and related procedures, and advise staff when there are changes to policy and/or procedures.
- Ensure effective induction for new staff.
- Provide regular training and updates for all staff; including maintaining a log of attendance for this and responding to school's emerging needs.
- Be alert to changes in legislation, developing advice from Child Protection Organisations and developments in society and technology; ensuring all of these are shared with staff.
- Ensure review of this policy. Reviewing at least annually, on issue of new advice / legislation and after any serious safeguarding incident to ensure it is still robust and fit for purpose.
- Speak with parents, where necessary and appropriate, when issues relating to Safeguarding, Child Protection and student welfare have been raised.
- On admission of a new student, request any existing information relating to Child Protection from the previous school
- Consider, when a student is moving school, if it would be appropriate to share information with their future school related to Child Protection.
- Maintain effective reporting and recording systems for all safeguarding issues which are manageable, confidential, enable clear communication and are not 'person dependent'.

The **Deputy DSLs and CPO** are appropriately trained and act in the absence of the DSL; carrying out the functions necessary to ensure the ongoing safety and protection of all students.

**ALL Staff** will:

- Be committed to the expectation that the welfare and wellbeing of students is a joint and collective responsibility and of paramount importance.
- Maintain and demonstrate an attitude of "it can happen here".
- Recognise their position of influence and 'perceived power' in their role as a member of staff.
- Be student-centred in their practice; always acting in the best interests of the student at all times.
- Recognise and understand that behaviour can be a student's way of communicating distress and changes to behaviour may be an indicator of abuse.
- Be vigilant to Safeguarding related issues; not hesitating to report something which makes them feel uncomfortable and trusting their instincts.
- Engage with all Safeguarding training.

- Have a firm understanding of the four main categories of abuse; neglect, emotional abuse, sexual abuse, physical abuse.
- Have an understanding that there are other ways in which children can be abused such as; Online Bullying, Child Sexual Exploitation, Child Criminal Exploitation, Female Genital Mutilation, Honour Based Violence, Radicalisation, Trafficking, Slavery, Peer Abuse, Forced Marriage.
- Have an understanding about self-harm and how this can be recognised and should be dealt with.
- Have an understanding of mental health in children and how to recognise signs of mental ill health.
- Have an understanding that poor / non-attendance can be a sign of abuse.
- Ensure they are familiar with the guidelines and procedures detailed in this policy and all related XCL MY policies listed at the end of this policy.
- Follow the guidelines and procedures detailed in this policy, and all related XCL Education Malaysia policies, and recommended documentation. See list at end of this policy.

## Contextual Safeguarding

It is important that when dealing with any sensitive issue the context of the situation is taken into account. A holistic view should be taken to ensure wider environmental factors are considered which may be a threat to safety and welfare of children. Any indicators that fall within what is normally acceptable parenting behaviour, within a Malaysian context, should not be ignored but staff should be mindful of the context.

## Establishing a Culture of Safety and Trust

XCL MY recognises that curriculum has an important role to play in the safeguarding of children. Through regular and effective PSHLE, specific units of work in a range of subjects, assemblies, workshops and class / form tutor time, the following areas are addressed:

- Student self-esteem, mental health and wellbeing, physical health (health care, hygiene and diet)
- Aspects of risk and managing risk; including self-protection strategies and generally 'Keeping Safe'.
- Developing a sense of boundaries between appropriate & inappropriate behaviour in adults & with staff.
- Acceptable and expected Peer – Peer behaviour.
- Confidentiality and privacy awareness.
- Online safety.
- Relationships education.
- Values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

## Attendance

Poor attendance and / or non-attendance can be a potential sign of abuse or neglect. It could also be a sign of some other safeguarding issue eg students being left 'home alone', sexual exploitation, undergoing female genital mutilation, forced marriage or travelling to conflict zones. XCL MY staff are expected to be vigilant in following the school Attendance Policy and procedures so that issues with attendance are detected early and dealt with appropriately. The Pastoral Leads in XCL MY family of schools will ensure that the Attendance Policy is updated regularly, attendance statistics are monitored / reported and issues with poor attendance are dealt with in a timely and appropriate manner.

## Student self-harm

Self-harm, also known as self-injury, is defined as the intentional, direct injuring of body tissue. Self-harm can be, but is not always, an indicator of suicidal intent. A student that you suspect is self-harming must be referred

to the School Counsellor and the relevant DSL. This should be recorded on the formal reporting form. Staff should not try and counsel the student themselves. Listen and then report.

See also the Self Harm Section in Appendix 1 (Definitions & Types of Abuse) & Appendix 5 (Recording & Reporting)

## Students who are living with Guardians or thought to be 'home alone'

The DSLs will be assisted by the Registry Department in ensuring there is an up to date list of students living with guardians. DSLs will inform form tutors about students who are living with guardians. If a staff member hears, suspects or has an email saying a student is staying alone and they are under 18, they must contact the relevant DSL.

A student who has not been signed over to a guardian by the parent in their absence is classified as a welfare case and a vulnerable child. In this case the parent is breaking Malaysian law as all children under 18 come under The Child Act 611 and are therefore minors.

If a child has been left alone and there is clear evidence of this, the school will then be expected to file a police report in line with the Child Act 611 stipulations.

## Peer on Peer Abuse

Peer abuse is behaviour by an individual or group, intending to physically, sexually or emotionally hurt others. All staff should recognise:

- Children are vulnerable to abuse by their peers.
- Children are capable of abusing their peers.
- Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.
- Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'.

Peer on peer abuse can include (but is not limited to):

- Bullying (including online bullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing
- Physical harm
- Sexual violence and sexual harassment
- Sexting (also known as youth produced sexual imagery)
- Initiation/hazing type violence and rituals.

See also The Child-on-Child Abuse Policy - Appendix 13.

## Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, however, it is crucial that they only do so in ways appropriate to their professional role and in relation to the student's individual needs and any agreed care plan.

Extra caution may be required where it is known that a child has suffered from previous abuse or neglect. Staff need to be aware that the child may associate physical contact with such experiences. Staff should also recognise that these students may seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively and help them to understand the importance of personal boundaries, reporting concerns to the DSL.

In certain curriculum areas, such as PE, music, drama, staff may need to initiate some physical contact with students, for example, to demonstrate a technique in the use of equipment or an instrument. Physical contact should only take place when it is necessary in relation to a particular activity. The extent of contact should be

made clear and undertaken with the permission of the student. Contact should be relevant to their age and understanding. Keeping parents and students informed of the extent and nature of any physical contact may also prevent misunderstanding and potential allegations.

All XCL MY Staff who work in the PE / swimming department will undertake training specific to this role.

XCL MY will endeavour to educate students also about what is appropriate physical contact. See also the section related to 'Physical Contact' within the Staff Code of Conduct.

## Reasonable Force

Teaching staff may reasonably intervene to prevent a child from:

- committing a criminal offence;
- injuring themselves or others;
- causing damage to property;
- engaging in behaviour prejudicial to good order and to maintain good order or discipline.

This applies when a teacher is on school premises and when he or she is in control or in charge of the student elsewhere, for example on a field trip or other authorised out of school activity.

Reasonable force is only appropriate where no other form of control is available and where it is necessary to intervene. Any force used must always be the minimum needed to achieve the desired result and must be appropriate for the age, sex and understanding of the student.

Any member of staff who is involved with, or witnesses, use of force on a student must inform the Head of School immediately following the incident. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. The member of staff involved must always provide a written report as soon as possible afterwards.

See the section related to 'Reasonable Force' within the Staff Code of Conduct.

## Isolation and One-to-One Working

If a teacher is alone with a student he/she should ensure that any such meeting or lesson is as visible as possible and that it takes place in public or semi-public places such as the library or classrooms. As such he/she should ensure that the door to the room has a glass panel which is not obscured or is left open. If this is not possible then another adult must be close by. Furniture should also be positioned to allow easy access into or out of the room.

Staff working in one-to-one situations with children and young people may be more vulnerable to allegations and students may be more vulnerable to harm by those seeking to abuse their trust. Every attempt should be made to ensure that the safety and security needs of both staff and students are met. Heads of School should undertake a risk assessment in relation to the nature and implications of one-to-one working and individual risk assessments should be carried out in respect of adults for whom lone working is an integral part of their role. Any arrangements should be reviewed on a regular basis. It may be necessary to amend these to take account of particular student needs. This does not mean that working one-to-one is unacceptable; it just requires a proportionate risk assessment.

No member of staff must ever be behind a locked door with a student. Staff should never arrange a one-to-one meeting in a remote or secluded area. Any meetings which take place outside agreed working arrangements should not take place without the agreement of DSL/Head of School and parents. Staff should always report any incidents to the DSL or Head of School or Campus Principal.

See the section related to 'Isolation and one-to-one working' within the Staff Code of Conduct.

## Grooming

Grooming is the process used by people with a sexual interest in children to prepare a child for sexual abuse. Grooming is the process which prevents the child from disclosing abuse which has taken place. Grooming is also



the process which ‘protects’ the abuser from being caught or being suspected by others. The act of Grooming can cause disbelief by others and can be a barrier to adults disclosing their suspicions of others. Grooming is often very carefully planned and is a very gradual process. It can take place over weeks, months or even years. Grooming involves building relationships not just with the child, but also with associated colleagues and the child’s family. Any child can be at risk of being groomed; both boys and girls can be groomed. Any adult can be groomed. All XCL MY staff will be trained in understanding what Grooming is, how to prevent themselves from being groomed, recognising the signs and symptoms of Grooming and how to report this. See Appendix 4 – Grooming

## Crushes and infatuations

Staff should recognise that it is not uncommon for students to be strongly attracted to a member of staff and/or develop a crush or infatuation. Staff should make every effort to ensure that their own behaviour cannot be brought into question, does not appear to encourage this and be aware that such infatuations may carry a risk of their words or actions being misinterpreted.

Early and effective intervention should be taken to prevent escalation and avoid hurt, embarrassment or distress for those concerned. (See Guidance for Safer Working Practice 2020). If a member of staff becomes aware that a student has developed a crush or has an infatuation with them, they must report their observation/concern to the DSL immediately.

If a staff member becomes aware that a student has developed a crush or infatuation with another adult within the school, they should report this observation/concern to a DSL or the Campus Principal immediately. In this case, the Campus Principal and the school’s DSL will inform the staff member in question of the student’s crush/infatuation. Sharing concerns and putting in place a plan to deal with it. The plan should be put in place for the member of staff concerned to ensure that they are not put at risk in relation to the student. This plan will be shared with appropriate persons to support the member of staff and will be reviewed on a regular basis. The member of staff concerned should keep a log of all contact with the student and share this regularly with the DSL or the Campus Principal.

Signs that a student may be developing a crush / infatuation for a member of staff:

- Bringing in gifts for the staff member.
- Seeking opportunities to speak to the member of staff alone.
- Going against school rules to be near to the member of staff, or be alone with them.
- Abnormal / increased level of contact for reasons not related to school.
- Asking a member of staff to be ‘friends’ on social media.
- Asking a member of staff for their personal contact details.

If any of these occur, the staff member should ask for guidance from a DSL. If a member of staff observes this happening between a student and another member of staff, they have a duty of care to tell a DSL or the Principal.

See also:

Staff Code of Conduct

Appendix 7 – Guidance for Identifying and Dealing with infatuations and ‘crushes’.

## Recognising Possible Signs and Indicators of Abuse

Individual indicators of abuse may not be particularly worrying in isolation, but in combination, they can suggest that there is some cause for concern. All school staff should be vigilant of students in their care who display any of the indicators of physical abuse, neglect, emotional abuse or sexual abuse.

Staff at XCL MY family of schools are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationship between staff, children and families which foster respect, confidence and trust can lead to disclosure of abuse and staff being alerted to concerns.

The following list is not prescriptive and many signs listed will not necessarily indicate abuse but staff should be vigilant and alert in noticing:

- Unexplained injuries including bruises, scratches, cuts, burns.
- Comments or language from the child that cause concern.
- Deterioration in general well-being including behaviour and / or physical appearance.
- Inability to trust others and make friends.
- Truancing, lying or stealing.
- Avoiding removal of clothes when changing for sports / swimming.
- Bullying other children or being bullied.
- Aggression or abuse towards others.
- Overly cautious around adults.
- Untreated medical conditions.
- Issues with personal hygiene.
- Obvious hunger or malnutrition.
- Significant alterations in behaviour.
- Unauthorized absences from school that do not have reasonable explanation or exhibit a suspicious pattern.

## General Do's and Don'ts

- Do not take photographs/videos of students on your own personal device unless with the permission of the Head Teacher/ if taken with personal device, transfer to school drives and delete from your personal devices
- Not allowed to publish ,e.g. videos and photos on social media. These must be transferred to school drives after the events and can only be used after vetting of the material by the school through the Marketing department and a member from the school academic team, Head of Subject and above.
- Do not become 'friends' with students on social media e.g. Facebook, Instagram (report if student adds you) (ex- students minimum 3 years)
- Do not exchange telephone numbers or personal contact details with students.
- Do not contact students using WhatsApp. (report if student adds you)
- You should not touch students unless within your job scope. When in job scope, physical contact should be kept to a minimum.
- You should not enter a student's/child toilet and should only use adult toilets.
- You should not enter the changing rooms or look into.
- Always remain in a physically visible environment. This might mean leaving the door open.
- You should not provide a student transport; trips, fixtures transport organised by school.
- You should not ask a student to carry equipment.
- You should not leave groups of students unsupervised.
- Try to avoid being one on one with students for extended periods
- One to one instruction should be a 'busy' part of the campus where you are visible

## What to do in the event of a safeguarding concern / suspicion / disclosure or allegation

Any member of staff who is told of any incident or who has suspicions of a safeguarding issue occurring in the school must report the information immediately to one of the DSLs. This includes reporting any concern which:

- May have been noticed, overheard by them.
- Has been directly disclosed to them by the student concerned, another student, or another member of staff.
- Happen to a student at home or outside the school environment.
- Involve improper conduct by a member of staff.

Any staff member to whom an allegation of child abuse is made should:

- Limit questioning to seeking clarification only, strictly avoiding leading the student or adult who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened.
- Stop asking questions as soon as the student or adult has disclosed the issue and facts have been clarified.
- Tell the informing student, or adult, that the staff member will now make sure that the appropriate people are brought in to follow the problem up. Staff members should never give absolute guarantees of confidentiality. They should, however, guarantee that they will only pass on information to the minimum number of people who must be told in order to ensure proper action is taken.

See Appendix 5– Listening and Reporting

If the DSLs cannot be contacted, then the Deputy DSL or CPO should be found. Not being able to find, or contact a DSL, should not be used as a reason for delaying reporting an incident. The incident, no matter how small, should be reported on the day it occurs - even if the school day is drawing to a close or is over. Modern day technology makes it possible to contact an appropriate member of staff at almost any time of the day.

Referrals and reports of incidents, disclosures, allegations or suspicions should be report to DSL followed up a report raised on My Concern. Staff should not use 'writing down' an incident or no time for 'form filling' as an excuse for not reporting immediately. Staff do not need to have written things down in order to be able to report them. Verbal reports can be relayed and followed up at the nearest possible convenience. Staff could use any paper and attach it when raising the My Concern report.

If the allegation or suspicion is about a DSL, the Campus Principal or the CEO, the report should be made to the Chair of the Governing Body following the processes outlined in the Whistle Blowing Policy.

## Who will conduct the investigation?

Reporting teachers should not investigate abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed by teachers. However, staff may ask questions of a student when they notice something which worries them or are told something concerning. Full training in the asking of questions will be given by the school.

Guidelines for asking questions can be found in Appendix 5- Listening and Recording

## Effective Reporting

- An effective written report will
- Be factual.
- Give an indication of how the student behaved and their manner when relaying facts.
- Be clear in stating who said what in the written report.
- Make it clear what questions, if any, were asked.
- Be written in pen (ink).
- Be written on a formal reporting form – or have the formal form attached to it if not.

## Procedures and Process steps

On receiving a report of abuse, the DSLs will:

1. Take necessary steps to protect any student involved from immediate risk or harm.
2. Investigate the allegation further. This may involve interviewing members of staff and / or students. Consult with the Campus Principal and / or the Deputy DSLs/ CPO in order to determine the appropriate action to be taken in regards to:
  - a) Informing a student's parent(s).
  - b) Medical examination or treatment.
  - c) Immediate protection (this may be needed for a student who has been the victim of abuse, a student who has given information about abuse, and a student against whom an allegation has been made).
  - d) Informing other relevant people at the school of the allegation and its investigation.
3. Inform the student or adult who made the initial allegation of what the next steps are to be, having agreed these with the Campus Principal.
4. If necessary, the Campus Principal and HR Manager will suspend the staff from duty, pending investigation, any staff member who is alleged to have abused a student or students.
5. Take any necessary steps for the longer-term protection and support of each student who has made allegations of abuse, or is alleged to have suffered from abuse, taking his or her wishes fully into account.
6. Take any necessary steps to protect and support a student who has made an allegation of abuse. The allegation may not later be substantiated, but even so the school has a welfare responsibility towards this student.
7. The Campus Principal will notify the CEO of XCL MY of any allegation that is being investigated by the DSL.
8. Assess whether there are any lessons to be learned or recommendations to be made for the future of the school in the light of the allegation and its investigation. Refer these to the campus Safeguarding Committee.
9. Ensure cooperation by the school in any subsequent investigation by the Police or relevant authorities.
10. Make arrangements where feasible for any student who has been the subject of abuse to receive any necessary counselling and support, by agreement with his or her parents where appropriate.

## Record Keeping

XCL MY family of schools use a safe platform called My Concern from the Safeguarding Company.



## Staff Training, Induction and Updates

It is the policy of XCL MY that all staff undergo training in Child Protection with a wider Safeguarding agenda as a combination of face to face sessions and online courses each academic year. There will be a combination of longer inputs, discussions, updates and short briefings. Each school within XCL MY is expected to develop training schedule on safeguarding and incorporate such agenda into induction programme for new employees.

Every member of staff will be expected to sign the acknowledgement slip in receipt of policies and attending training sessions. A sample acknowledgement slip can be found as Appendix 9. When delivering sessions remotely, a remote acknowledgement slip will be collected from attendees.

## Online Safety

XCL MY is committed to keeping pupils safe online. We therefore ensure that:

- All staff understand that children can be harmed online via hurtful and abusive messages, enticing them to engage in age inappropriate conversations, sharing and production of indecent images or encouraging risk taking behaviour
- The Acceptable Use Policies for staff and students and the BYOD Policy, detail how we keep pupils safe when using the internet and mobile devices.
- Online bullying by students, via electronic messages, will be treated as seriously as any other type of bullying and will be managed through our Anti-bullying Policy and Positive Behaviour Policy
- There is a clear and explicit procedure for dealing with handphones that are brought into school by students within the BYOD Policy.
- When school becomes aware of an online safety issue that has occurred outside of school, it is managed in accordance with the school Online Safety Policy.
- The school has appropriate filters and monitoring systems in place regarding use of the internet (including 3G, 4G, school server, log-ins and Wi-Fi). These are detailed in the Online Safety Policy.
- Staff should report any concerns of a safeguarding nature linked with technology to the DSL or Principal. These are Safeguarding issues and not technology issues.

## Safer Recruitment

All staff are recruited in line with the guidelines detailed in the Safer Recruitment Policy. These are outlined and summarised in Appendix 8 – Safer Recruitment Checklist.

## Preventing abuse

At XCL MY we strive to create an environment that prevents abuse occurring. We can do this by:

- Encouraging students to express any concerns they may have and working hard to create a climate of trust.
- Encouraging students to discuss their hopes and feelings in a non-judgmental environment, where they know their concerns will be taken seriously.
- Letting students know they will not be victimised for disclosing abuse or sharing their concerns.
- Educating parents / students in e-safety and how to deal with cyber-bullying.
- Ensure that the appropriate fire walls and filter systems for the school computer
- system / Wi-Fi network are in place and maintained.
- Avoid all personal social network contact with students.
- Do not take photographs of students on personal devices. A personal device is any device for which you are responsible for. This includes school allocated devices, personal handphones / iPad.
- Act as a protective factor for students in reporting all concerns no matter how small or insignificant they may seem.

See also the Staff Code of Conduct.

## Transferable Risk

Transferable Risk refers to a situation where a staff member has behaved outside of the school setting in a way that indicates they may not be suitable to work with children.

For example, where a member of staff is involved in an incident outside of school which did not involve children

but could have an impact on their suitability to work with children. Eg A Domestic Violence incident or a Drunk & Disorderly incident.

Staff have a duty to report:

- Any incidents they witness of other members of staff which they believe could indicate that the person is unsuitable to work with children.
- Any incidents they themselves are involved in so that these may be investigated and the transferable risk assessed.

If, after a full investigation, the behaviour of a member of staff is deemed to indicate or demonstrate that they have a character which is unsuitable to work with children, their contract may be terminated with immediate effect.

If, after full investigation, there is uncertainty surrounding the behaviour, a written instruction will be provided to the staff member clearly stating what the concerning behaviour was, why it was inappropriate and the next course of action should the behaviour be repeated.

The Campus Principal and CEO will conduct the investigation.

Questions exploring character are part of the interview process in order to assess 'transferable risk' prior to employment.

## Whistle Blowing

If any member of staff has any concerns about the conduct of another member of staff, they have a duty of care to report this. The details of how to do this are within the Whistle Blowing Policy. All allegations of child abuse, whether ultimately proven to be accurate or not, will be taken seriously by the school. Those making allegations will not be discriminated against in any way, nor will the school's disciplinary procedure be invoked against those making allegations in good faith.

## Unfounded allegations

All safeguarding allegations will be treated seriously by the school. In the event of an allegation against a member of staff being unfounded then normally the member of staff will be free to resume their duties. However, each case will be treated on an individual basis and the following may be considered before a member of staff is able to resume his or her duties:

- A risk assessment may be necessary.
- The school's disciplinary procedure may be invoked, even if the member of staff has been cleared of the initial allegations should there have been other breaches of the Code of Conduct.
- Additional support will be offered if necessary. This may take the form of, for example, extra training or even the offer of a different role within the school, if practicable.

## List of Appendices

Appendix	
1	Definitions and Types of abuse
2	Indicators of abuse and neglect (including Body Map) & Signs of Abuse
3	Types of Abuse
4	Grooming
5	Listening and Reporting
6	Recording on My Concern
7	Guidance for identifying and dealing with 'crushes' / infatuations

8	Safer Recruitment Checklist
9	Swimming and PE Safeguarding
10	Acknowledgement slip for receiving Safeguarding & Child Protection Policy / training
11	Request to Previous School for Safeguarding Information
11a	Receipt for giving / receiving CP information and records
12	Malaysian Law
13	Child on Child Abuse

**Other policies /documents relevant and to be read in conjunction with this Policy:**

- Whistle Blowing Policy
- Staff Code of Conduct
- Code of conduct for school trips
- Staff Handbook
- Bereavement Policy
- Acceptable Use Policy – Students and Staff
- First Aid Policy
- Health and Safety Policy
- Attendance Policy BYOD Policy
- Safer Recruitment Policy
- Trips Code of Conduct Agreement

**Other relevant documentation staff should be familiar with:**

- Keeping Children Safe in Education - September 2021
- Working Together to Keep Children Safe 2018
- Safer Working Practices 2019

**Review of Policy and Procedures**

After investigation of any serious Safeguarding issue, the policy and procedures will be reviewed to ensure that they are still robust and fit for purpose.

This policy will be reviewed at least annually. However, it will also be reviewed upon issue of new advice / legislation and after any serious safeguarding issue to ensure it is still robust and fit for purpose.

## Appendix 1 – Definitions and Types of Abuse

Staff need to have a firm understanding of the four main categories of abuse; neglect, emotional abuse, sexual abuse, physical abuse.

Staff also need to have an understanding that there are other ways in which children can be abused such as; Online Bullying, Child Sexual Exploitation, Female Genital Mutilation, Honour Based Violence, Radicalisation, Trafficking, Slavery, Peer Abuse, Forced Marriage.

Safeguarding and promoting the welfare of children	Defined for the purposes of this guidance as: a. protecting children from maltreatment b. preventing impairment of children's mental or physical health or development c. ensuring that children are growing up in circumstances consistent with the provision of safe and effective care d. taking action to enable all children to have the best outcomes
Child protection	Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Child	The terms 'child' and 'children' relates to all children and young people under the age of 18 years. However, the principles apply to all students, including those over the age of 18 years. 'Child' should therefore be read to mean any student at XCL MY family of schools.
Adult	The terms 'adults' and 'staff' relates to all those who work in a paid or unpaid capacity in the school. This also includes those who visit the school e.g. CCA coaches, contracted outside providers, contractors etc.
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.
Physical abuse	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.  ALL staff will be trained to look for signs of physical. They will speak to one of the DSLs if they are worried about a child.
Emotional abuse	The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.  ALL staff will be trained to look for signs of emotional abuse. They will speak to one of the DSLs if they are worried about a child.
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



	<p>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.</p> <p>ALL staff will be trained to look for signs of sexual abuse. They will speak to one of the DSLs if they are worried about a child.</p>
Neglect	<p>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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ol style="list-style-type: none"> <li>provide adequate food, clothing and shelter (including exclusion from home or abandonment)</li> <li>protect a child from physical and emotional harm or danger</li> <li>ensure adequate supervision (including the use of inadequate caregivers)</li> <li>ensure access to appropriate medical care or treatment</li> <li>ensuring that children are not left alone overnight</li> </ol> <p>It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.</p> <p>ALL staff will be trained to look for signs of neglect. They will speak to one of the DSLs if they are worried about a child.</p> <p>ALL tutors or class teachers and Heads of Years will be informed of students living with guardian. All tutors or class teachers will be advised to consider signs that a child may be living on their own e.g.:</p> <ul style="list-style-type: none"> <li>- not having enough food</li> <li>- looking unkempt</li> <li>- student planner not being signed</li> <li>- not having PE kit or equipment for lessons</li> </ul>
Self-harm	<p>The most common form of self-harm is using a sharp object to cut one’s skin. Other forms include behaviour such as burning, scratching, or hitting body parts. While older definitions included behaviour such as interfering with wound healing, excessive skin picking (dermatillomania), hair pulling (trichotillomania) and the ingestion of toxic substances or objects as self-harm, in current terminology those are differentiated from the term self-harm. Self-harm could be students using sharp and other implements to mark or cut themselves, purposeful eating disorders and food control.</p> <p>Signs of self-harm could include students staying covered up or avoiding PE or other events which would involve changing clothes. Students that are found to be often hiding under their desks and/or have visible wounds. Also posting or looking at self-harming type posts on social media. Fluctuating weight or rapid weight loss, fatigued, lethargic and sleeping during lessons. Social withdrawal, truancy or frequent requests to leave the classroom including long periods of time in the toilets.</p> <p>ALL staff should be alert to signs of self-harm. They will speak to a child if they are concerned about their behaviour and report their worries to one of the DSLs.</p>
Online/cyber bullying	<p>Online or cyber bullying is any form of bullying that is carried out through the use of electronic media devices, such as computers, laptops, smartphones, tablets, or gaming consoles.</p> <p>There are some things that make cyberbullying different to 'traditional' bullying:</p> <ul style="list-style-type: none"> <li>● 24-7 nature - the nature of online activity means you can be in contact at any time.</li> <li>● There is the potential for a wider audience and bullying incidents can stay online, for example: a photo that you can't remove</li> </ul>

	<ul style="list-style-type: none"> <li>● Evidence - a lot of cyberbullying incidents allow those experiencing it to keep evidence - for example, take a screen shot - to show to school staff or police if needed.</li> <li>● Potential to hide your identity - it is possible to hide your identity online which can make cyberbullying incidents very scary</li> <li>● Degree of separation - people who cyberbully often don't see the reaction of those experiencing it so it can sometimes be harder for them to see the impact of their actions</li> </ul> <p>Online or cyber bullying will be managed under the school's <b>Anti-Bullying Policy</b>. Harmful sexual behaviour will be identified and managed using the <b>Safeguarding Policy</b>. Sexting will be managed on a case by case basis.</p>
<p>Domestic abuse</p>	<p>Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 and over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:</p> <ul style="list-style-type: none"> <li>● Psychological</li> <li>● Physical</li> <li>● Sexual</li> <li>● Financial</li> <li>● Emotional</li> </ul> <p>Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.</p> <p>ALL staff will understand what domestic abuse is and the potential impact upon children and how this might be displayed.</p>
<p>Peer on peer abuse</p>	<p>Peer on Peer Abuse occurs when a young person is exploited, bullied and/or harmed by their peers who are the same or similar age; everyone directly involved in peer on peer abuse is under the age of 18.</p> <p>This is most likely to include, but may not be limited to: bullying (including cyberbullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals.</p> <p>ALL staff understand that children can abuse other children. Peer on peer abuse will be taken as seriously as any other form of abuse. All staff understand that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up’.</p> <p>Physical abuse between peers will be managed under the school's <b>Behaviour Policy</b>. Emotional abuse between peers will be managed under the school's <b>Anti-Bullying Policy</b>. Harmful sexual behaviour will be identified and managed using the <b>Safeguarding Policy</b>. Sexting will be managed on a case by case basis.</p> <p>In cases of suspected or actual peer on peer abuse a risk assessment will be undertaken and appropriate and proportionate control measures put in place to manage and reduce risk. DSLs understand that regarding peer on peer abuse, the victim and the perpetrator are likely to have unmet needs and require support to determine these.</p> <p>The DSL will assess on a case-by-case basis, and will consider. The DSL will consider:</p> <ul style="list-style-type: none"> <li>● the wishes of the victim in terms of how they want to proceed</li> <li>● the nature of the alleged incident</li> <li>● the ages of the children involved</li> <li>● the development stages of the children involved</li> <li>● any power imbalance between the children</li> <li>● is the incident a one-off or a sustained pattern of abuse</li> <li>● are there ongoing risks to the victim, other children, school or college staff</li> <li>● contextual safeguarding issues</li> </ul>

	<p>Following a report of sexual violence, the DSL (or deputy) will make an immediate risk and needs assessment, considering:</p> <ul style="list-style-type: none"> <li>● the victim</li> <li>● the alleged perpetrator</li> <li>● all other children</li> </ul> <p>Risk assessments will be recorded and kept under review as a minimum termly.</p>
<p>Child sexual exploitation</p>	<p>Child sexual exploitation involves exploitative situations, contexts and relationships where young people may receive something (e.g. food, accommodation, drugs, alcohol, gifts or simply affection) as a result of engaging in sexual activities. The perpetrator will not only groom the victim (possibly over a long period of time) but will always hold some kind of power which increases as the exploitative relationship develops. Sexual exploitation involves a degree of coercion, intimidation or enticement, including unwanted pressures from peers to have sex, sexual bullying including on line bullying (cyberbullying) and grooming. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.</p> <p>The school curriculum (whereby sexual relationships/PSHLE is delivered) will include relevant information around managing risk and staying personally safe.</p> <p>The school <b>Online Safety Policy</b> will ensure the safety of children by ensuring they cannot access inappropriate material when using the internet and that suitable filtering software is in place</p>
<p>Child Criminal Exploitation</p>	<p>Child criminal exploitation (CCE) is when children or young people are manipulated or coerced into committing crimes on behalf of criminal gangs or individuals.</p>
<p>Extremism</p>	<p>Extremism is defined as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.</p> <p>ALL staff will have 'due regard to the need to prevent people from being drawn into terrorism', known as the 'Prevent Duty'</p> <p>ALL staff will have a general understanding of how to identify a child who may be at risk of extremism</p> <p>ALL staff will use professional judgement in identifying children who might be at risk of extremism and act proportionately</p> <p>The school <b>Online Safety Policy</b> will ensure the safety of children by ensuring they cannot access terrorist and extremist material when using the internet and that suitable filtering software is in place.</p>
<p>Radicalisation</p>	<p>This refers to the process by which a person comes to support terrorism and forms of extremism, there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.</p> <p>ALL staff will have 'due regard to the need to prevent people from being drawn into terrorism', known as the 'Prevent Duty'</p> <p>ALL staff will have a general understanding of how to identify a child who may be at risk of radicalisation.</p> <p>ALL staff will use professional judgement in identifying children who might be at risk of radicalisation and act proportionately</p> <p>The school <b>Online Safety Policy</b> will ensure the safety of children by ensuring they cannot access terrorist and extremist material when using the internet and that suitable filtering software is in place.</p>

<p>Female genital mutilation</p>	<p>FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act and can cause physical and psychological harm in many ways.</p> <p>The age at which FGM is carried out varies greatly; for example, shortly after birth, during childhood or adolescence, just before marriage or during a woman’s first pregnancy.</p> <p>ALL staff need to be alert to the possibility of when a female student may be at risk of FGM or when it may have been conducted on them.</p>
<p>Honour based abuse</p>	<p>Honour-based abuse is defined as ‘an incident or crime involving violence, threats of violence, intimidation coercion or abuse (including psychological, physical, sexual, financial or emotional abuse) which has or may have been committed to protect or defend the honour of an individual, family and/or community for alleged or perceived breaches of the family and/or community’s code of behaviour.</p> <p>ALL staff need to be alert to signs of honour based abuse and must inform one of the DSLs if they are concerned about a student.</p>
<p>Forced marriage</p>	<p>Is one whereby one or both parties do not consent to marriage but are forced to do so through violence, threats or any form of coercion. Schools play an important role in safeguarding children from being forced to marry.</p> <p>ALL staff will have a general understanding of how to identify a child who may be at risk of forced marriage</p> <p>ALL staff will use professional judgement in identifying children who might be at risk of forced marriage and act proportionately</p>
<p>Trafficking and slavery</p>	<p>Trafficking is the process of trapping people through the use of violence, deception or coercion and exploiting them for financial or personal gain.</p>

## Appendix 2 – Indicators of Abuse and Neglect (including body map)

This is a summary of some of the indicators that may suggest a child is being abused or at risk of harm. On their own, however, these indicators cannot confirm whether a child is being abused or not. Each child needs to be considered in the context of their family and wider community; appropriate persons should carry out a proper assessment. What is important is that, if you feel unsure or worried, you should do something about it. Don't keep it to yourself.

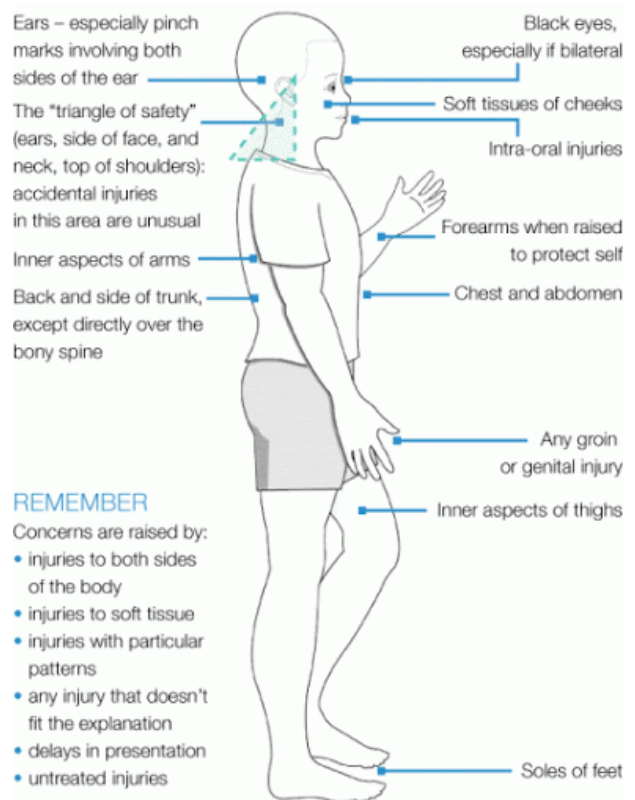
Most children collect cuts and bruises quite routinely, as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the bony prominences, e.g. shins. Injuries to the soft areas of the body are more likely to be inflicted intentionally and should therefore alert us to other concerning factors that may be present.

The most common sites for non-accidental injury are:

- Eyes
- Ears
- Cheeks
- Mouth
- Shoulders
- Chest
- Upper and inner arms
- Stomach/abdomen
- Genitals
- Front and back of thighs
- Buttocks
- Hands
- Feet

The NSPCC states that particular attention should be paid to bruises which have petechiae (dots of blood under the skin) around them, which are found more commonly in children who have been abused than in those injured accidentally.

Clusters of bruises are also a common feature in abused children. These are often on the upper arm, outside of the thigh or on the body. Furthermore, abusive bruises can often carry the imprint of the implement used or the hand.



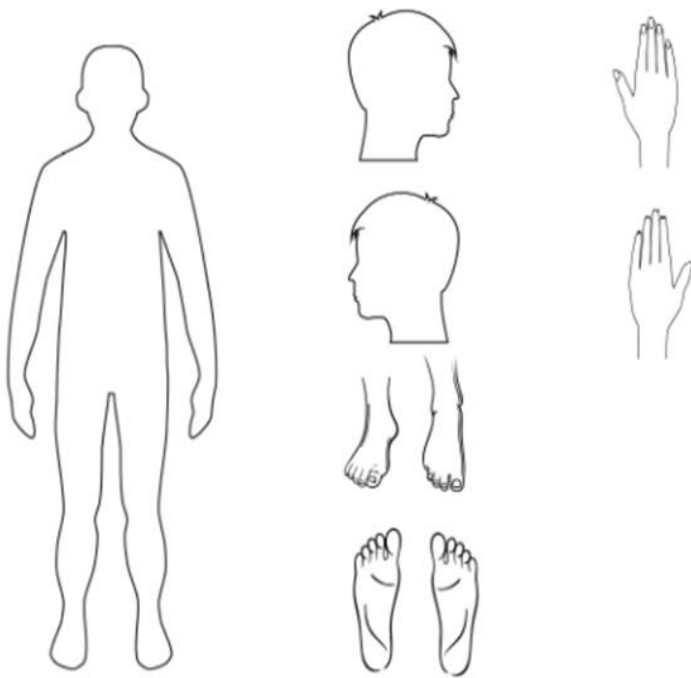
### Signs of abuse

Physical abuse	<p>Factors that should arouse concern:</p> <ul style="list-style-type: none"> <li>● Multiple bruising or bruises and scratches (especially on the head and face)</li> <li>● Clusters of bruises, e.g. fingertip bruising (caused by being grasped)</li> <li>● Bruises around the neck and behind the ears – the most common abusive injuries are to the head</li> <li>● Bruises on the back, chest, buttocks or on the inside of the thighs</li> <li>● Marks indicating injury by an instrument, e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle</li> <li>● Bite marks</li> <li>● Deliberate burning may also be indicated by the pattern of an instrument or object, e.g. electric fire, cooker, cigarette</li> <li>● Scalds with upward splash marks or tide marks</li> <li>● Untreated injuries</li> </ul>
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<p>Emotional abuse</p>	<p>Signs of emotional abuse may include:</p> <ul style="list-style-type: none"> <li>● Younger children being overly affectionate or clingy towards strangers</li> <li>● Lacking confidence and being anxious</li> <li>● Struggling to control emotions</li> <li>● Lacking social skills</li> <li>● Having few friendships</li> <li>● Appearing to have a negative relationship with parent or carer</li> <li>● Seeming isolated from their parent or carer</li> <li>● Being aggressive and cruel to other children and towards animals</li> <li>● Using language inappropriate for their age</li> </ul> <p>A perpetrator of emotional abuse may:</p> <ul style="list-style-type: none"> <li>● Ignore their victim</li> <li>● Display excessive control</li> <li>● Manipulate their victim</li> <li>● Refuse to say kind comments or acknowledge positive behaviour</li> <li>● Blame or scapegoat the child</li> <li>● Criticise, threaten, and/or humiliate the child</li> <li>● Use sarcasm and cruel jokes to mock the child</li> <li>● Make the child perform degrading acts</li> <li>● Push a child beyond their physical, mental or emotional limitations</li> <li>● Expose the victim to distressing events such as domestic abuse, drug taking, verbal fights, etc.</li> <li>● Refuse to have an emotional life with the child, also known as emotional unavailability</li> </ul>
<p>Sexual abuse</p>	<p>Physical observations may include:</p> <ul style="list-style-type: none"> <li>● Damage to genitalia, anus or mouth</li> <li>● Sexually transmitted diseases</li> <li>● Unexpected pregnancy, especially in very young girls</li> <li>● Soreness in genital area, anus or mouth</li> <li>● Unexplained recurrent urinary tract infections and discharges or abdominal pain</li> </ul> <p>A person may observe these behavioural traits:</p> <ul style="list-style-type: none"> <li>● Sexual knowledge inappropriate for age</li> <li>● Sexualised behaviour in young children</li> <li>● Sexually provocative behaviour/promiscuity</li> <li>● Hinting at sexual activity</li> <li>● Inexplicable decline in school performance</li> <li>● Sudden apparent changes in personality</li> <li>● Lack of concentration, restlessness, aimlessness</li> <li>● Socially withdrawn</li> <li>● Overly-compliant behaviour</li> <li>● Acting out, aggressive behaviour</li> <li>● Poor trust in significant adults</li> <li>● Regressive behaviour, onset of wetting, by day or night</li> <li>● Onset of insecure, clinging behaviour</li> <li>● Arriving early at school, leaving late, running away from home</li> <li>● Suicide attempts, self-mutilation, self-disgust</li> <li>● Eating disorders</li> </ul>

Neglect	<p>The following physical signs may indicate that a child is being neglected:</p> <ul style="list-style-type: none"><li>● Appearing hungry as though they may have gone without breakfast</li><li>● Turning up to school without lunch or money for food</li><li>● Repeated injuries caused by lack of supervision</li><li>● Skin sores, rashes, flea bites, scabies or ringworm</li><li>● A thin or swollen tummy</li><li>● Having poor hygiene, being visibly dirty or smelling</li><li>● Being without adequate clothing</li><li>● Being tired</li><li>● Having poor language or communication skills</li><li>● Being anaemic</li><li>● Not meeting developmental milestones</li><li>● Appearing to be a carer for family members</li><li>● Being unsupervised</li><li>● Living in an unsuitable home environment</li><li>● Being left alone at home.</li></ul>
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## Body Map



## Appendix 3

### Definitions and Types of Abuse

Staff need to have a firm understanding of the four main categories of abuse; neglect, emotional abuse, sexual abuse, physical abuse.

Staff also need to have an understanding that there are other ways in which children can be abused such as; Online Bullying, Child Sexual Exploitation, Female Genital Mutilation, Honour Based Violence, Radicalisation, Trafficking, Slavery, Peer Abuse, Forced Marriage.

### Radicalisation

This refers to the process by which a person comes to support terrorism and forms of extremism, there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

- ALL staff will have 'due regard to the need to prevent people from being drawn into terrorism', known as the 'Prevent Duty'
- ALL staff will have a general understanding of how to identify a child who may be at risk of radicalisation
- ALL staff will use professional judgement in identifying children who might be at risk of radicalisation and act proportionately

The school **Online Safety Policy** will ensure the safety of children by ensuring they cannot access terrorist and extremist material when using the internet and that suitable filtering software is in place.

**Child Sexual Exploitation (CSE)** involves exploitative situations, contexts and relationships where young people may receive something (e.g. food, accommodation, drugs, alcohol, gifts or simply affection) as a result of engaging in sexual activities. The perpetrator will not only groom the victim (possibly over a long period of time) but will always hold some kind of power which increases as the exploitative relationship develops. Sexual exploitation involves a degree of coercion, intimidation or enticement, including unwanted pressures from peers to have sex, sexual bullying including online bullying (cyberbullying) and grooming. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

- The school curriculum (whereby sexual relationships/PSHLE is delivered) will include relevant information around managing risk and staying personally safe.
- The school Online Safety Policy will ensure the safety of children by ensuring they cannot access inappropriate material when using the internet and that suitable filtering software is in place

**Honour Based Violence (HBV)** 'A crime or incident, which has or may have been committed, to protect or defend the honour of the family and/or community'. (ACPO Working Definition 2008) ALL staff and volunteers will have a general understanding of how to identify a child who may be at risk of Honour Based Violence.

**Forced Marriage** is one whereby one or both parties do not consent to marriage but are forced to do so through violence, threats or any form of coercion. Schools play an important role in safeguarding children from being forced to marry.

**Female Genital Mutilation (FGM)** is encompassed within the term Honour Based Violence:

ALL staff need to be alert to the possibility of when a female pupil may be at risk of FGM or when it may have been conducted on them

**Peer on Peer Abuse** occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in peer on peer abuse is under the age of 18.

This is most likely to include, but may not be limited to: bullying (including cyberbullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals.



ALL staff understand that children can abuse other children. Peer on peer abuse will be taken as seriously as any other form of abuse. All staff understand that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up’. Physical abuse between peers will be managed under the school's **Behaviour Policy**. Emotional abuse between peers will be managed under the school's **Anti-Bullying Policy**. Harmful sexual behaviour will be identified and managed using the **Safeguarding Policy**. Sexting will be managed on a case by case basis

In cases of suspected or actual peer on peer abuse a risk assessment will be undertaken and appropriate and proportionate control measures put in place to manage and reduce risk. DSLs understand that regarding peer on peer abuse, the victim and the perpetrator are likely to have unmet needs and require support to determine these.

The DSL will assess on a case-by-case basis, and will consider. The DSL will consider:

- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident
- the ages of the children involved
- the development stages of the children involved
- any power imbalance between the children
- is the incident a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, school or college staff
- contextual safeguarding issues

**Following a report of sexual violence, the designated safeguarding lead (or deputy) will make an immediate risk and needs assessment, considering:**

- the victim
- the alleged perpetrator
- all other children
- Risk assessments will be recorded and kept under review as a minimum termly.

**Domestic abuse** is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 and over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Exposure to domestic abuse and / or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

ALL staff will understand what domestic abuse is and the potential impact upon children and how this might be displayed.

### **Self-Harm**

The most common form of self-harm is using a sharp object to cut one's skin. Other forms include behaviour such as burning, scratching, or hitting body parts. While older definitions included behaviour such as interfering with wound healing, excessive skin picking (dermatillomania), hair pulling (trichotillomania) and the ingestion of toxic substances or objects as self-harm, in current terminology those are differentiated from the term self-harm.



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Schools

R·E·A·L  
Schools



Self-harm could be students using sharp and other implements to mark or cut themselves, purposeful eating disorders and food control. Signs of self-harm could include students staying covered up or avoiding PE or other events which would involve changing clothes. Students that are found to be often hiding under their desks and/or have visible wounds. Also posting or looking at self-harming type posts on social media. Fluctuating weight or rapid weight loss, fatigued, lethargic and sleeping during lessons. Social withdrawal, truancy or frequent requests to leave the classroom including long periods of time in the toilets.

## Appendix 4 – Grooming

### What is Grooming?

Grooming is the process used by people with a sexual interest in children to prepare a child for sexual abuse or exploitation in some way. Grooming prevents the child from disclosing abuse which has taken place. Grooming is also a process which 'protects' the abuser from being caught or being suspected by others. The act of Grooming can cause disbelief by others and can be a barrier to adults disclosing their suspicions of others.

Grooming is often very carefully planned and is a very gradual process. Grooming can take place over weeks, months or even years. Grooming involves building relationships not just with the child, but also with the child's family and other significant adults in the child's life to make them seem trustworthy or authoritative. Any child can be at risk of being groomed; both boys and girls can be groomed. Any adult can be vulnerable to the influence of grooming. Any adult can be a Groomer – no matter their age, gender, race, religion, profession.

Children who are groomed can be sexually abused, exploited and / or trafficked.

### Types of Grooming

Children and young people can be groomed online, in person or both.

The groomer / abuser could be a stranger or someone they know. It could be a family member, a friend or someone who has targeted them from a position of authority eg. teacher, faith group leader or sports coach.

When a child is groomed online, groomers may hide who they are by sending photos or videos of other people. Sometimes this will be of someone younger than them to gain the trust of a "peer". They might target one child online or contact lots of children very quickly and wait for them to respond.

### How does Grooming Happen?

Grooming is about making a child think that sex, or a sexual act, with the offender is normal or that they have no choice. Offenders do this by building a relationship and emotional connection with the child as well as securing their status and authority with the adults in the child's life.

Children can be groomed online through:

- Social media networks
- Text messages and messaging apps, like WhatsApp
- Email
- Text, voice and video chats in forums, games and apps.

Online, or in person, groomers can use tactics like:

- Pretending to be younger
- Giving advice or showing understanding
- Buying gifts
- Giving attention
- Taking them on trips, outings or holidays.

### A grooming relationship

The relationship can take different forms.

- The offender could try to convince the young person that they are in a loving relationship as boyfriend or girlfriend.
- The offender might become a mentor to the young person, making them think they are someone who can help them or teach them things.
- Sometimes the offender will become a dominant figure in a young person's life, perhaps even having a relationship or connections with their parent or caregiver eg teacher, sports coach, religious figure.
- The offender may also build a relationship with the child's family or other significant adults in the child's life e.g. work colleagues, making them think that they are someone who can be trusted with the child.

One of the most sinister aspects of grooming is the way in which it so closely mimics genuinely positive relationships. This can leave victims very unsure of who to trust, sometimes assuming that they can trust no one, even people who seem to be nice and to care.

### Gaining power over a child

In all of the above relationships the offender will be looking to gain power over the child. Offenders will use any means they can to exert this power and influence because this enables them to manipulate or coerce the child into sexual activity and offers them some protection from being detected.

If a child feels they are in love, this gives an offender power. The offender can emotionally blackmail the child by threatening to withdraw their affection or saying, 'if you loved me you would.'

Offenders sometimes blackmail children by threatening to share secrets that the child has told them. In some cases, they will tell the child there will be terrible consequences for refusing to do sexual things.

Groomers might try and isolate children from their friends and family, making them feel dependent on them and making them the most powerful influencer over the child.

The offender might use blackmail to make a child feel guilt and shame or introduce the idea of 'secrets' to control, frighten and intimidate.

### Keeping it secret

In all cases the offender will look to make sure that the child won't tell anyone else about the abuse, telling them to keep it secret.

They often tell young people that no one will believe them, or that if they tell anyone they will be the one in trouble. This is why it is so important to tell a child that you believe them and do not blame them if they disclose they have been sexually abused.

Many children and young people don't understand that they have been groomed, or that what has happened is abuse. They may have complicated feelings, like loyalty, admiration, love, as well as fear, distress and confusion. Even if they tell you, or you find out about the abuse, children may attempt to remain in ongoing contact with the offender, defend the abusers actions and/or have very mixed feelings about it all. They may need help in making sense of their feelings and protecting them from further abuse.

### Signs of grooming

It can be difficult to tell if a child is being groomed – the signs aren't always obvious and may be hidden. Older children might behave in a way that seems to be "normal" teenage behaviour, masking underlying problems.

Some of the signs you might see include:

- Being very secretive about how they're spending their time, including when online.
- Spending increased amounts of time at a place suddenly e.g. staying behind after school, going to sports training for longer than the published times, going more frequently to a place of worship.
- Having an older boyfriend or girlfriend.
- Having money, or new things, like clothes and mobile phones that they can't or won't explain.
- Underage drinking or drug taking
- Spending more or less time online or on their devices
- Being upset, withdrawn or distressed.
- Sexualised behaviour, language or an understanding of sex that's not appropriate for their age.
- Spending more time away from home or going missing for periods of time.
- Giving gifts to an adult they have contact with.

- Talking about the adult in a way which shows significant admiration for them or indicates they enjoy spending time with them.
- Telling another trusted person that they are ‘in love’ with or have ‘a crush on’ an adult.

A child is unlikely to know they are being groomed.

If a member of staff suspects a child may be being groomed, they should report this to the DSL or school Principal immediately.

### **If a child reveals they have been groomed**

If a child talks to a member of staff about grooming it is likely to be after the grooming has been discovered since many children will not realise they have been groomed. If they do talk about it, it is important to:

- Listen carefully to what they are saying
- Let them know they have done the right thing by telling you
- Tell them it is not their fault
- Say you will take them seriously
- Do not confront the alleged abuser
- Explain what you'll do next
- Report what the child has said as soon as possible.

### **Effects of grooming**

Grooming can have both short and long-term effects. The impact of grooming can last a lifetime, no matter whether it happened in person, online or both.

A child or young person might have difficulty sleeping, be anxious or struggle to concentrate or cope with schoolwork. They may become withdrawn, uncommunicative, and angry or upset. Children, young people and adults who have been groomed may live with:

- Anxiety and depression
- Eating disorders
- Post-traumatic stress
- Difficulty coping with stress
- Self-harm
- Suicidal thoughts
- Sexually transmitted infections
- Pregnancy
- Feelings of shame and guilt
- Drug and alcohol problems
- Relationship problems with family, friends and partners.

### **Who is at risk of grooming?**

Any child can be at risk of being groomed; both boys and girls can be groomed. Any adult can be vulnerable to the influence of grooming. Any adult can be a groomer – no matter their age, gender, race, religion, profession.

Some children are more at risk of grooming, particularly those who are vulnerable e.g. children in care, living with a Guardian and those living with disabilities. Groomers will exploit any vulnerability to increase the likelihood a child or young person will become dependent on them and less likely to speak out.

## Protecting yourself from being accused of grooming

All XCL MY Staff have a responsibility to protect themselves from false allegations by ensuring they do not put themselves in vulnerable situations and positions.

All adults in school have a relationship of trust with all students by virtue of their position and the work they undertake. This relationship of trust must not be distorted by fear or favour and those in positions of trust must exercise responsibility as a consequence of the power they have over those they teach and/or care for.

Where a relationship of trust exists, allowing a relationship to develop in a way that might lead to a sexual relationship is wrong.

XCL MY staff can protect themselves from being accused of grooming by **not**:

1. Allowing the balance of a student / staff relationship to tip over the professional boundary into one weighted in casual and /or friendship contact. Relationships between students and staff should remain firmly professional and academically related at all times. Relationships can be positive, nurturing and caring whilst remaining professional.
2. Giving presents to an individual student (as opposed to small gifts to a whole group) outside of the school rewards system.
3. Accepting secretive, 'special' or individual gifts from a student (unless these for an occasion such as a birthday or 'thank you'. There may be occasions when children may wish to pass small tokens of appreciation to adults. Whilst this is acceptable although if the member of staff feels that this may indicate a crush or infatuation he/she should refer this matter to the DSL or Head of School. It is unacceptable to receive gifts on a regular basis or of any significant value (worth RM100 or more).
4. Giving their personal details to a student (or recently former student). This includes personal email addresses, home addresses, hand phone numbers.
5. Accepting Students or recently former students as 'friends' on social media.
6. Transporting students in their own vehicles or alone unless this is unavoidable, in which case specific approval from the designated member of staff should be obtained in advance. Where this is not possible, for example in an emergency, the incident should be reported to the Head of School.
7. Meeting with students behind a locked door.
8. Meeting with students in a room where there is no visibility from the outside.
9. Showing favour towards an individual student.

## Protecting yourself, as an adult, from being vulnerable to and influenced by a Groomers Actions and Behaviour

It is the expectation of XCL MY that all staff are committed to safeguarding and promoting the welfare and wellbeing of all students. With this in mind, staff are required to maintain and demonstrate an attitude of "it can happen here" with regards to child abuse.

Staff are expected to be familiar with the Safeguarding & Child Protection Policy (and the Appendices within the Policy), the Staff Code of Conduct and the Whistle Blowing Policy. These Policies make it overtly clear what is expected and acceptable of staff conduct.

All staff are requested to keep an open mind and believe that any adult in a school could be capable of grooming and abusing a child.

Staff should not hesitate to report any concerns and should put their own fears and concerns about doing so aside; acting always in a 'student centred' manner. Note:

*References to 'child' and 'children' relates to all children and young people under the age of 18 years. However, the principles apply to all students, including those over the age of 18 years.*

*References to 'staff' relates to all those who work in a paid or unpaid capacity in the school. This also includes those who visit the school e.g. CCA coaches, contracted outside providers, contractors etc.*

## Appendix 5 - Listening and Reporting

### How and when will a child communicate a concern / tell someone about an incident? Who will they tell?

Sometimes a child will speak about an incident or something which is happening to them indirectly, which can mean they do not share the details without being prompted. They might bring a concern to attention in a roundabout way. An example of this is, "Sometimes my step-dad keeps me up at night."

Concerns and incidents can also be disguised, for example: "I have a cousin who is being abused."

In other cases, children 'hint' about something eg I don't like staying over at my friend's house.

Often a child will report something will be made at times which may seem 'inconvenient'. For instance, as a lesson is ending and everyone is making their way out, towards the end of a day as students are leaving for home, whilst a member of staff is on break duty. Staff must always be ready to listen to disclosures, no matter when they happen.

Sometimes children will say things which they are hoping will initiate a conversation.

Sometimes children will struggle to find a time when they can get a trusted adult alone so they can speak in private. This is particularly the case in busy schools.

XCL MY family of schools will make it clear to students how they can make private disclosures when they don't feel able to speak face to face or do not seem to be able to get a trusted adult alone. In Primary, 'honesty boxes' are placed in each classroom and children can write and post anything they are worried about.

Young children will often make disclosures to classroom assistants or class teachers since they spend a lot of time with these adults.

Older children will often tell friends before an adult.

### When the child is speaking and during the communication

1. Reassure the child. Avoid communicating with shock or horror when they are speaking. Speak slowly, calmly and maintain neutral body language and facial expression.
2. Provide a safe environment. Make sure the setting is confidential and comfortable. If a student discloses something when there are others around you may need to wait until the others have left to ask them about things.
3. If there is a paper and pen to hand, you should record things as is appropriate to do so but do not allow this to interrupt the flow of the disclosure from the child.
4. Limit questioning to seeking clarification. Do not put your own suggestions forwards.
5. Do not interrogate. Don't ask the child a lot of questions, especially leading questions, which means a question in which you provide a possible answer (examples: Did your uncle hit you on the leg?). Listen to the child, letting them explain what happened in their own words.
6. Limit questioning to only four areas if the child has not already provided you with the information. What happened? When was this? Where did it happen? Who was there?
7. Avoid questions which have a 'yes' or 'no' answers. Instead, use open ended questions, open phrasing eg 'tell me more about that' or acknowledgement phrases eg 'ok, go on...'
8. Stop asking questions as soon as you have the clarification.
9. Listen and don't make assumptions. Listen more than you talk and avoid advice giving or problem solving. Don't assume you know what the child means or is going to say.
10. Never give a guarantee of confidentiality but do assure them that the minimum number of people will be told who can help ensure proper action will be taken.

## Further Hints and tips for effective listening

- Do not stop the child in the middle of the story to go get someone or do something else.
- Do not interrupt.
- Mirror language to encourage them to speak and show you are listening.
- NEVER ask questions or make statements that imply the child was at fault in any way...
- Why didn't you tell me before?
- What were you doing there?
- Why didn't you stop it?
- What did you do to make this happen?
- Are you telling the truth?
- You should have told me this before.

## Effective Reporting

Recordings should be fact – not opinion. For instance, rather than writing 'she was very upset', you should write the things which demonstrate this: She was crying and would not give eye contact.

As much as possible write the child's exact words and do not replace them with your own interpretation. For instance, if the child says 'slap', do not replace with 'hit'.

Where you have used the child's exact words you should make this clear with speech marks or by writing a play script.

Try to include what you said in the write up also.

Remember...

- All disclosure and incidents must be reported and raised on My Concern
- The report should always be by the person with whom the child had the conversation.
- The report should be completed as soon after the conversation / incident as possible.
- Immediately an incident has been reported, a DSL should be informed.
- It is rare and can be a shock for staff when they receive a disclosure. Remember to ask for help and support as soon as possible.




## Appendix 6 - Reporting Platform: My Concern

### Report a Concern

#### Name(s) of Pupil(s)

Please enter at least 3 characters to search



 Please add the Pupil(s) who are the subject of this concern and add any other Pupil(s) you want associated to it.

#### Concern Summary

e.g. Injury - Megan arrived at School this morning with a badly bruised right eye.

#### Send Concern to

Please Select a Notification Group



#### Concern Date/Time

DD/MM/YYYY HH:MM



#### Details of Concern

There is no need to repeat the Concern Summary.



#### Location of Incident

Not Applicable




Is this Concern urgent?

#### Action Taken



#### Attachment

Select File

 Please attach any media that is relevant to this concern.

Submit Concern

## Appendix 7 - Guidance for identifying and dealing with 'crushes' / infatuations

Staff need to recognise that it is not uncommon for students to be strongly attracted to a member of staff and/or develop a crush or infatuation with an adult.

### Indicators that a crush / infatuation is present or developing

The child may...

- Try to get time alone with the staff member, hanging around after school / class for instance.
- Brings gifts in for the member of staff.
- Gain attention to get more time with the member of staff.
- Break rules in order to gain time with the member of staff.
- Sign up for trips or after school activities for more opportunity to spend time with the member of staff.
- Try to make contact with the member of staff for non-academic reasons.
- Try to find out information about the member of staff e.g. their family, their hobbies.
- Try to find out personal contact information.
- Try to make contact outside of school e.g. waiting for them outside of their home, 'bumping' into them in the local shops or asking to 'friend' them on social media.

A child who has developed a crush or infatuation may:

- Start spending increasing time online.
- Withdraw from their normal routines or friends.
- Have a change in their appearance or behaviour.

### What to do if you become aware of a Crush / Infatuation

- If a member of staff becomes aware that a student has developed a crush or has an infatuation with them, they must report their observation/concern to one of the DSLs or Principal immediately.
- If a staff member becomes aware that a student has developed a crush or infatuation with another adult in a position of trust within the school, they should report this observation/concern to the DSL or Principal immediately. In this case, the Principal and the school's DSL will inform the staff member in question of the student's crush/infatuation.

### How will a report of a crush / infatuation be dealt with?

Early and effective intervention should be taken to prevent escalation and avoid hurt, embarrassment or distress for those concerned. (Guidance for Safer Working Practice 2019).

To avoid unnecessary embarrassment, hurt or distress, information will only be shared on a need to know basis. It may be necessary to share information about the crush/infatuation with the member of staff's line manager and the student's Head of Year in order to effectively monitor and intervene as appropriate.

It's important to remember that there may be emotional issues in the child's private lives which you are not aware of, such as a divorce. So, they may be seeking a connection with an adult. This is why it's important to deal with the situation sensitively and check your own behaviour to make sure it is professional at all times.

The student will be spoken to about their behaviour towards the member of staff and an assessment will be made to determine if they require any support in managing their. The parents/carers of the young person will be informed of the school's concerns about their behaviour, and what actions the school are implementing to safeguard both the staff member and student.

The member of staff concerned should keep a log of all contact with the student and share this regularly with the DSL.

Any serious concerns should be reported immediately to the Executive Principal or DSL. If the concerns are related to the DSL or Executive Principal, the procedures outlined in the Whistle Blowing Policy should be used.

A plan should be put in place for the member of staff to ensure that they are not put at risk in relation to the young person. This plan will be shared with appropriate persons to support the member of staff and will be reviewed on a regular basis.

If the member of staff who is concerned is in a role where physical contact is necessary eg dance or PE, they should avoid any kind of physical contact. Demonstrations should not involve touch, but could be demonstrated using other students, done using a mirror or completed side by side in mirroring movements.

### **When the Crush or Infatuation becomes Problematic or Extreme**

A revised plan should be implemented with further safeguards for the member of staff and the young person. This plan must be reviewed regularly. If the young person continues with extreme or persistent behaviour which is in turn causing the member of staff distress, the school's Executive Principal and/or DSL should hold a meeting with the student and their parents to put into place an agreement about future conduct of the young person and which also outlines the sanctions and consequences if the terms of this agreement are not upheld by the student.

This agreement will outline a number of sanctions which include permanent exclusion from the school. This agreement must be reviewed on an agreed regular basis.

### **Responding to Pupils Making Physical Contact with You**

Should a student of any age seek a member of staff out for physical contact, or seem to want to establish an intimate relationship with them, they should discuss this with the Executive Principal or DSL immediately.

It may be that other staff have experienced similar issues with the same student or group of students. For example, a young child needs to be encouraged to demonstrate their affection in different ways in different situations. An older student may have developed a "crush" on you and this needs to be sensitively and openly managed with your line manager, to avoid leaving you open to allegations of misconduct or abuse.

In all situations where a student initiates inappropriate physical contact, it is the responsibility of the adult to distance themselves and help the pupil understand the importance of personal boundaries. It is important that the incident and the circumstances should be reported to the DSL and recorded as soon as possible, and, if appropriate, a copy placed on the confidential file relating to that student.

### **Protection yourself from false accusation in a 'crush' / infatuation situation**

Staff should make every effort to discourage crushes and infatuations. Staff are responsible for making sure their behaviour cannot be brought into question. Staff who do not take the necessary precautions to safeguard themselves leave themselves open to being accused of 'grooming'.

Staff are encouraged to always trust their instinct.

The Staff Code of Conduct and Appendix 4 (Grooming) also detail how staff can protect themselves from accusations and allegations.

## Appendix 8 - Safer Recruitment Checklist

Ongoing Deterrent Measures	Persons / Department responsible
Safeguarding & Child Protection Policy on website	Marketing
Promotional Literature has Safeguarding Commitment statement	Marketing
Commitment to Safeguarding and student wellbeing statement in recruitment section of website	Marketing
Standard item on Board Meeting Agenda	Lead DSL
Standard item reported upon in Headteacher's report to Principal	Lead DSL
At least one staff training session per term dedicated to Safeguarding and wellbeing	DSL / CPO/ CPD lead
<b>Job adverts</b>	
Commitment to Safeguarding statement included within Job Advert	HR
An explanation of the post holder's individual responsibility to Safeguarding and promote the wellbeing of students is included as part of role within Job Description	HR
Commitment to protect the wellbeing of students referenced within Person Specification (qualities you would expect someone who is working with children & young people to have)	HR
Information pack sent to interested applicants includes Safeguarding Policy, Staff Code of Conduct and Whistle Policy.	HR
<b>Application form</b>	
Makes it easy to identify gaps in employment history and track employment history.	HR
Includes a section that asks the applicant to state how they meet the criteria from the person specification.	HR
Asks for the name of at least 2 references – and a statement that one of these must be the most recent employer.	HR
A separate self-declaration of convictions and cautions, and a signed statement that they are not barred from working with vulnerable groups.	HR
<b>Pre - Interview</b>	
Application forms are scrutinised by at least 2 people before being short listed.	HR / Senior academics
Gaps in employment history are identified and a note made of these to explore within interview.	HR / Senior academics
<b>Interview</b>	
Gaps in employment history explored.	Interviewer
A question about safeguarding, exploring a concrete example, is built into the interview.	Interviewer
Questions to explore character and suitability to work with children and young people are built into the interview.	Interviewer
All questions are agreed before an interview between the interview panel.	Interviewer

At least one person interviewing should have completed 'Safer Recruitment' training within the last 3 years.	Interviewer
Where interviews are conducted online (or other electronic means) a process of 2 interviews should be followed.	Interviewer
Interview notes are all kept on file.	HR
<b>References</b>	
References only accepted from professional email addresses.	HR
Check for designations using www	HR
Telephone verification check	HR
Any 'grey' areas are followed up by telephone call with a written record being made of what has been said.	HR / Campus Principal
Reference from last employer is requested as standard. This should be the Head of School / Principal.	HR
<b>Pre -Employment Checks.</b>	
<b>Shortlisted candidates should bring to interview...</b>	
Photographic evidence is submitted to prove they are who they say. These are cross references with each other and details submitted on the application form.	HR
Original copies of all professional certificates.	HR
Documentation to prove that the candidate is eligible to work in Malaysia.	HR
A completed disclosure of criminal convictions form as published with the application form / pack.	HR
Any DBS checks they have had previously. After 2018, schools outside of the UK cannot apply for these for their staff.	HR
International Child Protection Check IPCP – available from ACRO Criminal Records Office. Applies to UK Nationals only – or non-UK Nationals who have previously lived in the UK.	HR
Prohibition Check (completed through Teaching Regulation Agency Website)	HR
Official Police Clearance check of coming from country other than UK.	HR
Section 128 check for anyone who is taking leadership position (completed through Teaching Regulation Agency Website)	HR
SCR completed with all checks recorded and dated	HR
<b>Medical fitness</b>	
Medical check arranged and evidence of outcomes kept on file.	HR
<b>Observation and Supervision</b>	
Supervised Induction Plan	Head of School / Department
Line manager / supervisor allocated as stated within Job Description	Head of school
Induction includes safeguarding session with CP Policy and school specifics (appendices to CP policy)	DSL

Induction includes Equality and Diversity session. If not covered in induction, this needs to be covered within first six weeks of working.	DSL
<b>SCR columns</b>	
Identity check	HR
A barred list check (completed through Teaching Regulation Agency Website)	HR
DBS certificate (for those who have worked in the UK)	HR
IPCP – for those are UK Nationals or have lived at some point in the UK	HR
Prohibition Check (completed through Teaching Regulation Agency Website)	HR
Section 128 check (Senior Leaders Only and completed through Teaching Regulation Agency Website)	HR
Professional Qualification check	HR
Police Clearance form - for those coming from places other than the UK. Or a Certificate of Good Conduct	HR
A check to show if the position involves 'regulated activity'.	HR
Medical check	HR
Seeking Reference and checks for identity of referees	HR
Reference reading	Head of School / Principal / Head of Department
Termly checking of SCR	Campus Principal

## Appendix 9 - Safeguarding & Child Protection Policy Physical Education & Swimming Safeguarding

### Aims

The aim of this appendix is to provide clarity on safeguarding learners to every stakeholder involved with sport at XCL MY family of schools. It is our duty to create a safe environment for all learners and staff wherever they participate. It promotes good practice and provides information on challenging practice that is harmful. As an educational entity working towards singular safeguarding goals, there will, by definition, overlap with pre-existing child protection and safeguarding documentation and staff must always refer to the XCL MY Safeguarding & Child Protection Policy.

### Definitions

- *Learners* refers to all children who attend XCL MY family of schools or any other entity with which staff may come into contact. For the purposes of safeguarding and duty of care obligations, 'learners' will encompass whether they are under or over 18 years of age.
  - *SP* refers to this PE Safeguarding Policy.
  - *SCPP* is the Safeguarding & Safeguarding & Child Protection Policy (updated August 2023)
  - *DSL* is the Designated Safeguarding Lead

### Philosophy

- All learners have the right to participate, enjoy and develop through sport, in a safe and inclusive environment, free from all forms of abuse, violence, neglect and exploitation.
- Learners have the right to have their voices heard and listened to. They need to know who they can turn to when they have a concern about their participation in sport. Learners have a right to be involved in shaping safeguarding policy and practice and for this reason, the SP should be considered a working document, constantly under review.
- Everyone has the right to be treated with dignity and respect and not be discriminated against based on gender, race, age, ethnicity, ability, sexual orientation, beliefs, religious or political affiliation.

### Promoting Good Practice

Child abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about the appropriate action to take.

Abuse can occur in any situation and PE staff must consider their vulnerability particularly in the sporting environment. Some individuals will actively seek employment or voluntary work with young people in order to harm them. A coach, instructor, teacher, official or volunteer will have regular contact with young people and be an important link in identifying cases where they need protection. All suspicious cases of poor practice should be reported following the guidelines in this document and the SCPP.

### Good Practice Guidelines

All staff should be encouraged to demonstrate exemplary behaviour in order to protect themselves from false allegations. The following are common sense examples of how to create a positive culture and climate. Good practice means:

- Always working in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication)
- Treating all young people/disabled adults equally, and with respect and dignity
- Always putting the welfare of each young person first, before winning or achieving goals

- Maintaining a safe and appropriate distance with learners
- Building balanced relationships based on mutual trust which empowers learners to share in the decision-making process
- Treating learners as individuals by getting to know them and their names – nicknames are inappropriate, and staff must always avoid this to ensure there can be no accusations of favoritism.

## Trips

The information below must be considered alongside the Staff Code of Conduct for Trips. Staff must:

- Ensure that if mixed teams are taken away for the day or night, they should always be accompanied by a male and female member of staff
- At tournaments or residential events, adults should not enter learners' rooms unless necessary. Adults must knock and give them time to cover up. If it is not possible for adults to enter the room as a pair, then the door must remain open and they must make clear their reason for being in the room to the learners. A brief note of the details of this entry must be made and adult should discuss with accompanying staff afterwards.
- Adults must never invite learners into their rooms
- Staff must never consume alcohol or smoke on school trips. They should ensure that travelling parents also adhere to this rule.
- Securing parental consent in writing to act in loco parentis, if the need arises to administer emergency first aid and/or other medical treatment
- Keep a written record of any injury that occurs, along with the details of any treatment given

## Changing in PE

There are occasions where there will be a need for an appropriate level of supervision to safeguard young people and/or satisfy health and safety considerations. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment. This means that adults should always:

- Avoid any physical contact with learners, but particularly when they are in a state of undress
- Avoid any intrusive behaviour, which may be easily misinterpreted
- Never enter the changing room or student toilets
- Announce their intention of entering changing rooms in cases of looking for kits/ missing items and ensure no students are inside.
- Give verbal commentary when dealing with changing issues
- Adults should never change in the same place as learners
- Learners of all ages should be encouraged to be as independent as possible; adults should consider prompting and giving verbal help/encouragement before offering assistance
- Staff should be especially vigilant when helping learners with underclothes and swimming costumes. (EY to Year 3 only)
- Assistance should be a last resort and take place openly, not out of sight of others.
- All learners should be treated fairly and with respect for their privacy and dignity
- Staff must be in immediate proximity to changing learners i.e. outside the door, in the corridor, between the two changing spaces.
- No adult is to stay in the room with these learners but may enter if required.

There is no statutory requirement for learners to be under constant supervision. For older groups, the member of





staff should appoint one or two responsible learners who are discreetly asked to report any incidents arising in the changing room, or to alert the member of staff to any situation that requires intervention. In all cases, the member of staff must be present immediately outside the changing rooms to perform any necessary interventions. When changing, learners should be given a time limit to ensure that they change quickly, this could be in the form of a game to see who can change quickest.

Allegations about a member of staff, from any source, must be reported as soon as possible to the DSL or Campus Principal, who will act in accordance with the school's procedures.

## PE Staffroom

The PE staffroom is the designated office space for PE department staff to work, rest, collaborate and share best practice, enhancing the team dynamic and furthering departmental pedagogical knowledge. To that end staff must be aware of the following:

- Students must never enter the staffroom under any circumstances. This will be noted clearly outside the gym at both entrances and immediately next to the PE staffroom door
- Students are not permitted to enter:
  - For water
  - For equipment
  - To retrieve technology
  - To ask about lost and found
  - To assist a member of staff
  - To enquire about events (all information will be posted on the Sun Bears notice board)

If a student does find their way to the staffroom, conversations must take place outside, in full view of CCTV and preferably with another member of staff present if possible.

- The staffroom window must never be covered
- Furniture must be kept well away from the door and all areas of the staffroom should be visible from outside

## Non-negotiables

- Staff must never offer to provide lifts in vehicles to learners no matter how short the distance
- You must never give out personally identifiable information such as contact numbers, email, social network display names, address details etc.
- Staff must always be aware of their tone of voice, body language and behaviour around learners and never partake in situations that may be misconstrued.

## Appendix 10 - Safeguarding Policies Acknowledgement Slip

I have received training on the Code of Conduct and Ethics, Safeguarding & Child Protection Policy and Whistleblowing Policy conducted by the Designated Safeguarding Lead (DSL).

These policies have been summarised for me. I understand where to locate the full policies and the associated appendices.

I understand it is my responsibility to familiarise myself with the Safeguarding & Child Protection Policy and its appendices as well as the other related policies in the safeguarding folder including the Code of Conduct and Whistleblowing Policy.

I fully understand my responsibility to report any concerns to the DSLs within school.

I fully understand my duty to 'whistle blow' and report any concerns about staff in the school.

I am committed to the expectation that the welfare and wellbeing of XCL MY family of schools' students is a joint and collective responsibility and of paramount importance.

I understand that failure to comply with school policies may result in being issued with a written warning or possibly dismissal from my position.

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_



## Appendix 11 - Child Protection and Student Safeguarding Declaration Form

### CONFIDENTIAL

FAO: Designated Senior Leader for Child Protection (DSL)

As part of our commitment to safeguard and promote the welfare of all students, we would be grateful if you could complete and return this form regarding the student below who has applied to <Name of school>.

Student's Full Name	
Date of Birth	
Current School and Date Joined	

Are there any Child Protection concerns with regard to this student? YES\*/ NO

(Experiencing or at risk from a significant harm; involvement of external agencies)

Are there any Safeguarding concerns with regard to this student? YES\*/NO

(Wider concerns linked to health and safety, general welfare and wellbeing)

\*If you have answered YES, we would like to contact the Designated Safeguarding Lead. Please provide contact details below:

Contact Name	
Contact Position	
Contact Email Address	
Contact Phone Number with Country Code	

Any records subsequently passed to us will be kept securely in accordance with the UK Child Protection procedures and only accessed by the Designated Safeguarding Lead at <Insert name of school>, unless it becomes necessary to discuss the records with an appropriate agency.

Signature	
Print Name	
Date	
Role in School	

Please Return to: *Insert email address of DSL*

## Appendix 11a - Receipt for giving / receiving Child Protection and Safeguarding Information and Records

### CONFIDENTIAL

FAO: Designated Senior Leader for Child Protection (DSL)

I hereby acknowledge that I have received child protection/ safeguarding information and records for the student below from <Insert name of school>

Student's Full Name	
Date of Birth	
Current School and Date Joined	

Below are my contact details below:

Contact Name	
Contact Position	
Contact Email Address	
Contact Phone Number with Country Code	

I confirmed that any records subsequently passed to us will be kept securely in accordance with the UK Child Protection procedures and only accessed by the Designated Safeguarding Lead at our institution unless it becomes necessary to discuss the records with an appropriate agency.

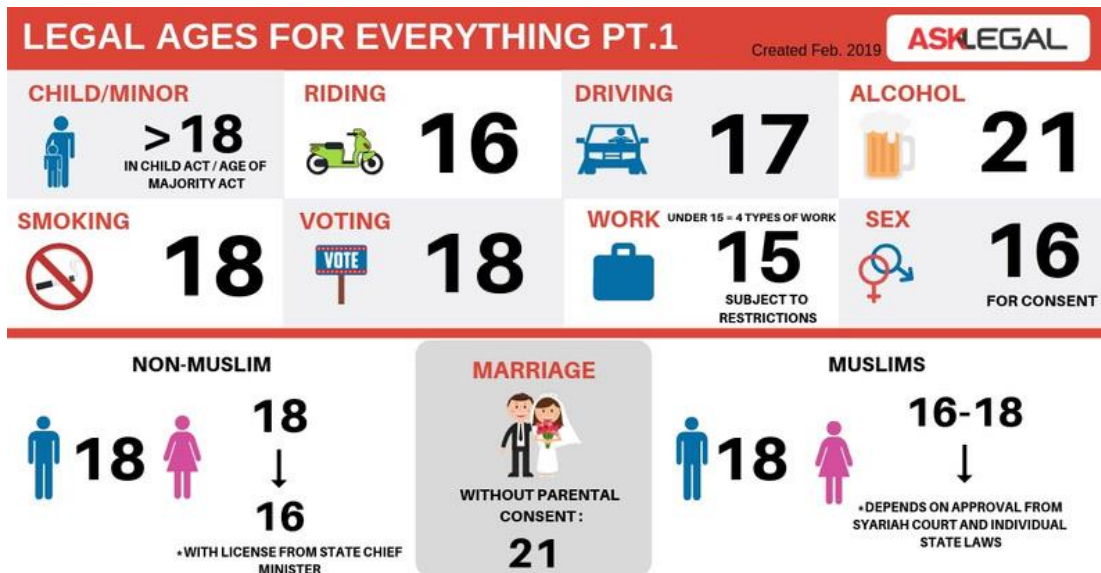
Signature	
Print Name	
Date	
Role in School	

## Appendix 12- Understanding The Law in Malaysia

There are three main laws that cover child abuse: **The Penal Code**, the **Sexual Offences Against Children Act 2017**, and the **Child Act 2001**.

Malaysia's legislations regard the definition of a child in civil law to be a person below 18 years of age. Please note that for the purposes of Safeguarding and Child Protection, all persons undertaking activity as a student within XCL MY family of schools is classified as a child.

### Legal Ages within Malaysia



### Malaysia's Sexual Offences against Children Act 2017

MSOC 2017 is the Main Act to protect Children from Sex offenders and offences.

Key Points staff should note:

- 1) There are increased penalties specified for people who commit an offence under this Act if they are in a relationship of trust with the child eg. a parent, a teacher, a coach, a guardian, In addition to the standard punishment to which the offender is found guilty they may be additionally punished with imprisonment for a term not exceeding five years and shall also be punished with whipping of not less than two strokes.
- 2) Grooming is illegal. It is punishable with imprisonment for a term not exceeding five years and whipping.

- 3) Failure to report a crime is a crime – See Mandated Reporters section within this document.
- 4) Evidence of a child witness can be admitted and need not be corroborated.
- 5) Evidence from agent provocateur is admissible.
- 6) There are severe punishments for watching, making, participating in, exchanging, selling and distributing Child pornography. Child Pornography carries punishment of imprisonment for a term not exceeding thirty years and shall also be punished with whipping of not less than six strokes.
- 7) Physical Sexual Assault is classed as an adult, who, for sexual purposes,
  - a) touches any part of the body of a child;
  - b) makes a child touch any part of the body of such person or of any other person;
  - c) makes a child touch any part of the child's own body; or
  - d) does any other acts that involve physical contact with a child without sexual intercourse

The act of touching may involve the act of touching with any part of the body or with an object and may be done through anything including anything worn by the person touching or by the child touched.

In determining what constitutes 'sexual purposes', the court may take into consideration, among others, the part of the body that is touched, the nature and extent of the act of touching or the physical contact and all other circumstances surrounding the conduct. Sexual Offences against Children

Any persons found guilty of committing this offence and shall, on conviction, be punished with imprisonment for a term not exceeding twenty years and shall also be liable to whipping.
- 8) Sexual offences against a child includes non-physical sexual assault, such as exposing a child to anything sexual either through speech, action or visual representation. This therefore includes any communication which relates to sexual anything of a sexual nature or any sexual activity. This is deemed to be anything which a reasonable person might think is 'sexual'. There is no offence committed if the communication is for education, scientific or medical purposes.
- 9) Presumption of age is not an admissible defence in court.
- 10) Anyone found guilty of a sex offence under this Act is under police supervision for one to three years.

## **Child Act 2001**

This Act serves in:

RECOGNISING that the country's vision of a fully developed nation is one where social justice and moral, ethical and spiritual developments are just as important as economic development in creating a civil Malaysian society which is united, progressive, peaceful, caring, just and humane.

RECOGNISING that a child is not only a crucial component of such a society but also the key to its survival, development and prosperity.

ACKNOWLEDGING that a child, by reason of his physical, mental and emotional immaturity, is in need of special safeguards, care and assistance, after birth, to enable him to participate in and contribute positively towards the attainment of the ideals of a civil Malaysian society.

RECOGNISING every child is entitled to protection and assistance in all circumstances without regard to distinction of any kind, such as race, colour, sex, language, religion, social origin or physical, mental or emotional disabilities or any other status.

ACKNOWLEDGING the family as the fundamental group in society which provides the natural environment for the growth, support and well-being of all its members, particularly children, so that they may develop in an environment of peace, happiness, love and understanding in order to attain the full confidence, dignity and worth of the human person (see also 14 Laws of Malaysia ACT 611).

RECOGNISING the role and responsibility of the family in society, that they be afforded the necessary assistance to enable them to fully assume their responsibilities as the source of care, support, rehabilitation and development of children in society:

The Act outlines the following:

- Establishment of Child Protection Teams.
- Establishment of the National Council for Children.
- Constitution and jurisdiction of Court for Children.
- Meaning of child in need of care and protection.
- The Powers of Court for Children.

Other Key Points:

- 1) It is an offence to leave a child without reasonable supervision. This offence is punishable upon conviction for a fine not exceeding twenty thousand ringgit or imprisonment for a term not exceeding five years or to both. An incident happened in October 2018, where a woman was charged under section 33 of the Child Act when she left her 6-year old niece at home alone for approximately two hours without reasonable supervision.
- 2) Corporal punishment (spanking, caning, etc) is classified as Child Abuse under section 31 of the Child Act 2001. Section 17(2) (a) of the Child Act explains physical abuse as follows:  
*“A child is physically injured (abused) if there is substantial and observable injury to any part of the child’s body as a result of the non-accidental application of force... that is evidenced by... a laceration, a contusion, an abrasion, a scar, a fracture or other bone injury, etc.”*  
So, if a child is hit with a rotan (cane) or hanger (or anything else) and it leaves bruises, marks, or scars on his/her body, this is child abuse under the Child Act. The punishment for this is a fine up to RM 50,000, and/ or 20 years imprisonment. For example, a mother was sentenced to a total of 30 years jail and fined RM 100,000 for regularly beating up her 12-year old daughter and 10-year old son with her bare hands and other objects.
- 3) Child Exploitation is an offence. This includes anyone who sells, hires, obtains possession of a child or facilitates the use of children for labour can be punished by law. This includes prostitution and the movement of children within, into and outside of Malaysia. These crimes are punishable with fines not exceeding fifty thousand ringgit, imprisonment for a term not exceeding fifteen years. Any person who is convicted of a second or subsequent offence is liable to whipping of not less than six strokes but not more than 10 strokes.

### **Criminal Responsibility**

The age of criminal responsibility in Malaysia is 10. This is stated in statute under Section 82 of Malaysian Penal Code and Article 2 of the Child Act 2001.

Therefore, a child below the age of 10 can’t be convicted of any other crime. This is based on the presumption of ‘doli incapax’ (also known as the defence of infancy). A child is presumed too young to understand the consequences of their actions or distinguish between ‘right and wrong’.

In Malaysia, this age-old common law presumption For Syariah criminal offences, Article 2 and 51 of the Syariah Criminal Offences (Federal Territories) Act 1997 indicates it will not be an offence if done before the age of puberty (baligh). However, these acts may only apply to Muslim children in Federal Territories, and since Islamic laws could vary depending on the state, we can’t say if the same standard applies in each state.

### **Henry Gurney Schools**

There are 5 Henry Gurney Schools in Malaysia. Their purpose is to rehabilitate child offenders between the ages of 14-18.

The rehabilitation programmes in these schools are divided into four stages:

- Orientation Programme: Induction, Orientation, Assessment
- Strengthening Self-Personality Programme: Spiritual Module, Academic Module, Counselling Module
- Sports and Recreation Module
- Vocational Training: Sewing, Craft, Batik, Baking

A child may be sent to a Henry Gurney School if:

- (a) a child is found guilty of any offence punishable with imprisonment;
- (b) the probation report submitted to the Court For Children shows that the child is not suitable to be rehabilitated in an approved school;
- (c) it appears to the Court For Children that the offence committed is serious in nature; and by reason of the nature of the child's criminal habits and tendencies it is expedient that the child be subject to detention for such term and under such instruction and discipline as appears most conducive to his reformation and the repression of crime.

## Reporting Abuse

The Public can report abuse in the following ways:

### 1) Via Talian Nur – Dial 15999 or WhatsApp 019-2615999 to seek help and emotional support.

The Women, Family and Community Development Ministry is taking all calls received via its Talian Kasih hotline seriously, including issues concerning domestic violence and child abuse. The ministry's Social Welfare Department is committed to taking immediate action (against the perpetrators) in accordance with the Child Act 2001 and Domestic Violence Act 1994. When making a report you should be ready to give the following information:

- Name of child
- Location/Address
- Reason for suspicion
- Your name and contact

### 2) Via Hospital

Take the child to the nearest hospital and report to the Emergency Department/ Outpatient Department that you suspect the child has been abused.

### 3) Via Police

Make a police report on the suspected abuse, or call 999

## Mandated Reporters

Under the Malaysian law, Child Act 2001, doctors, members of the family and child care providers are mandated to immediately report children suspected to be physically or emotionally injured as a result of being ill-treated, neglected, abandoned or exposed, or is sexually abused to the Protector *Jabatan Kebajikan Masyarakat* (Social Welfare Department) which takes on the role of a protector.

Should doctors, members of the family and child care providers not comply with the reporting they can be liable to a fine not exceeding RM5000 or to imprisonment for a term not exceeding two years or both (Child Act 2001, Section 27-29).

Teachers, counsellors and the general public should also report child abuse should the child divulge the abuse to them even though they are not mandated to do so. They can make a report to the police.

Further Information about Malaysia Law can be found in the Malaysian Federal Gazette: <http://www.federalgazette.agc.gov.my/>



## Appendix 13 - Child-on-Child Abuse Policy

### Philosophy

At XCL MY, we believe that no one should have to experience feeling violated by someone else's words or actions; especially not by their peers. We believe peers should be one of the key protective factors in a child's life and we strive to educate our students about this. We believe our school environment, systems and training should support students and staff in understanding and recognising unacceptable behaviours which may constitute, or lead to abuse. We are committed to proactive as well as reactive approaches.

All staff at XCL MY (including; the Board of Governors, senior leaders and all other staff) are committed to the prevention, early identification and appropriate management of child-on-child abuse both within and beyond the school environment.

In particular, we believe that, in order to protect children:

- 1) All staff should be aware of the nature and level of risk to which their students are or may be exposed to child-on-child abuse through training and support.
- 2) There should be a clear and comprehensive strategy in place which is tailored to our context and is understood by all stakeholders (including students themselves and their parents).
- 3) It is not acceptable to merely take a reactive approach to child-on-child abuse in response to alleged incidents of it; and we believe that in order to tackle peer on-peer abuse proactively we must look at wider issues e.g. training, the curriculum, recording systems, early identification and intervention strategies.
- 4) We should never pass off peer-on-peer abuse as 'banter', 'just having a laugh', 'boys being boys' or 'part of growing up'.

As with all the policies at XCL MY, any reference to 'child' and 'children' made within this policy (or any other Safeguarding Documents) applies to all students. 'Child' should be read to mean any student on our campus. Similarly, references to 'adults' and 'staff' within the Child Protection and Safeguarding Policies relates to all those who work in a paid or unpaid capacity in the school. This also includes full time staff, part time staff and those who visit the school e.g. coaches, contracted outside providers, contractors etc.

### What is child-on-child abuse?

Child-on-child abuse is any form of abuse (physical, sexual, emotional, financial abuse) and coercive control exercised between children, and within children's relationships (both intimate and non-intimate), friendships, and wider peer associations.

Child-on-child abuse can take various forms, including (but not limited to):

- bullying (including cyberbullying)
- Relationship abuse
- Domestic violence
- Sexual exploitation
- Youth violence
- Harmful sexual behaviour
- Prejudice-based violence eg, gender-based violence, race based violence.

Online child-on-child abuse is any form of peer-on-peer abuse with a digital element, for example; sexting, online abuse, coercion and exploitation, child-on-child grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment.

**How can a child who is being abused by their peers be identified?** All staff should be alert to the well-being of students and to signs of abuse and should engage with these signs, as appropriate, to determine whether they are caused child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will

disclose or present with behaviour(s) as a result of their experiences will differ.

Staff should be mindful of the following list which may be possible indicators that peer-on-peer abuse taking place:

- Absence from school
- Disengagement from school activities
- Physical injuries
- Mental or emotional issues
- Lack of self esteem
- Withdrawal from activities / social contact
- Lack of sleep
- Alcohol / substance misuse
- Changes in normal behaviours
- Inappropriate behaviours for age
- Outbursts of anger or abuse towards others

**Are some children particularly vulnerable to abusing or being abused by their peers?** Any child can be vulnerable to peer-on-peer abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to peer-on-peer abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family.

Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to peer-on-peer abuse. Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers

Research suggests that:

- Child-on-child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure will also be different.
- Children with Additional Educational Needs (AEN) and/or Disabilities (AEND) are three times more likely to be abused than their peers without AEND. The potential for children with AEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs due to communication barriers and difficulties.
- Some children may be more likely to experience peer-on-peer abuse than others as a result of certain characteristics such as sexual orientation (or perception about this), ethnicity, race or religious beliefs.

### **A whole school approach**

The School actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

1. Maintaining an attitude of 'it could happen here'; responding appropriately to all reports and concerns, including those outside the school and / or online. As well as being vigilant and reporting concerns observed and noted within school.
2. Educating all stakeholders about this issue. This training and education includes:
  - i) The importance of taking seriously all forms of peer-on-peer abuse (no matter how 'low level' they may appear) ensuring that no form of child-on-child abuse is ever dismissed as banter, 'horseplay' or teasing
  - ii) Social media and online safety teaching; including how to encourage children to use social media in a

positive, responsible and safe way, and how to enable them to identify and manage abusive behaviour online.

iii) Case studies which educate and inform about the nature and prevalence of peer on-peer abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via PSHLE, the Student Centred Safeguarding Programme and the wider curriculum.

3. Specifically and overtly teaching students about consent including teaching them basic facts such as:
  - (i) a child can never consent to any sexual activity.
  - (ii) the age of consent is 16 in Malaysia.
  - (iii) sexual intercourse without consent is rape.
  - (iv) consent is applicable to any kind of boundary and does not need to be touch; it can, for instance, be image sharing.
4. Engaging parents on these issues by:
  - i) talking about them in groups and one to one when necessary.
  - ii) asking parents what they perceive to be the risks facing their children and how they would like to see the school address those risks.
  - iv) involving parents in the review of School policies and the teaching of concepts.
5. Support the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing in-school counselling and therapy to address underlying mental health needs.
6. Work with governors, senior leadership team, and all staff, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community.
7. Create conditions in which our students can aspire to, and realise, safe and healthy relationships fostering a whole-school culture: which is founded on the idea that every member of our school community is responsible for building and maintaining safe and positive relationships, and helping to create a safe school environment in which violence and abuse are never acceptable or tolerated.
8. Focus on creating trusting relationships with staff, and in which staff understand, through regular discussion and training, the importance of these relationships in providing students with a sense of belonging, which could otherwise be sought in problematic contexts, in which students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to. Create an environment which:
  - i. Proactively identifies positive qualities in students;
  - ii. Nurtures these qualities;
  - iii. Teaches and encourages students to think about positive hopes for the future; and supports students in developing small-scale goals that enable realistic ambitions, and which provides supervised activities to students that give them the experience of having their needs met that might otherwise apparently be met in abusive circumstances.

## Dealing with incidents

The school will always carry out or put in place a 'safety / action plan' in respect of:

- i. Any child who is alleged to have behaved in a way that is considered to be abusive or violent
- ii. Any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child or
- iii. Any child who may be at risk due to the alleged abusive or violent behaviour by another child as deemed appropriate by the DSL.

Where it is alleged that a child has behaved in a way that is considered to be inappropriate or problematic (as opposed to abusive or violent), the DSL will use their professional judgment – based on the particular concern(s)



and/or allegation(s) raised, and the needs and circumstances of the individual child/children in question.

Careful judgment and consideration are required as to whether alleged behaviour, which might be judged to be inappropriate by an adult, might actually be harmful to another child. Where other children have been identified as witnesses to alleged abuse or violence, consideration should also be given by the DSL to whether there might be any risks to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them. Information sharing, data protection and record keeping

When responding to concern(s) or allegation(s) of peer-on-peer abuse, the school will: • Always consider carefully, how to share information about the concern(s) or allegation(s) with the student(s) affected, their parents, staff, and other students and individuals, • Record the information using the MyConcern system.

### **Report alleged criminal behaviour to the police.**

Alleged criminal behaviour will ordinarily be reported to the police. However, there are some circumstances where it may not be appropriate to report such behaviour to the police. For example, where the exchange involves sexual imagery but does not involve any aggravating factors. All concerns or allegations will be assessed on a case by case basis, and in light of the wider context by the DSLs and Principal.

### **Disciplinary action**

Understanding the 'power dynamic' that can exist between children and young people is very important in helping to identify and respond to peer on peer abuse. There will be a power imbalance and this may be due to age, status or social / economic situation. The perpetrator in one situation may be a powerless victim in another so it is essential to try to understand the perpetrator and what is driving their behaviour before taking sanctions.

The school may wish to consider whether disciplinary action may be appropriate for any child/children involved. However, if there are police proceedings underway, or there could be, it is critical that the School works in partnership with the police and authorities.

Where a matter is not of interest to the police or further authorities, the school may still need to consider what is the most appropriate action to take to ensure positive behaviour management.

Disciplinary action may sometimes be appropriate to:

- Ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour.
- Demonstrate to the child/children and others that peer-on-peer abuse can never be tolerate.
- Ensure the safety and wellbeing of other children.

Possible sanctions, disciplinary measures which may be considered:

- Written and formal warning (this may also be used in conjunction with internal isolation and fixed term exclusion).
- Isolation from, or prevention from participation in enrichment activities for a fixed period of time (especially where the 'victim' is involved in these activities).
- Internal isolation (length dependent on severity and age / developmental stage of perpetrator)
- Fixed term exclusion from school (length dependent on severity and age / developmental stage of perpetrator)
- Permanent exclusion from school (for extreme or repeated offences after previous warnings)

When considering sanctions, the school will always take into account the severity of the abuse, the age of the child, the emotional development stage of the child, the specifics of the case in hand and the negotiations agreed between child, staff and, if appropriate, parental expectations and views. The school will also, wherever appropriate, possible and necessary, take a 'staged' approach. For instance, first and only incidents will always be treated with more lenience than second or subsequent incidents.

- The students involved may also need:
- Support from a buddy / mentor in school



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- Support from the school counsellor
- Referring out to specialist therapy sessions
- ‘Teaching’ sessions around child protection and safeguarding concepts outside of, and extra to, the Student Centred Safeguarding Programme to help them fully understand concepts such as sexual crimes, age of criminal responsibility, consent.

This is the school’s policy for any issue that could constitute child-on-child abuse, however, it relates to, and should be read alongside, the schools’ other safeguarding policies / documents, including, but not limited to; anti-bullying (including cyber-bullying), online safety, Child Protection and Positive Behaviour Management.



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