

Sri KDU International Child Protection Policy
2021-2022

Contents

Introduction	1
Philosophy	2
Aims	2
Malaysian Law	2
Key Roles and Responsibilities	3
Contextual Safeguarding	5
Establishing a Culture of Safety and Trust	5
Attendance	6
Student Self -harm	6
Students who are living with Guardians or thought to be 'home alone'	6
Peer on Peer Abuse	6
Physical Contact and Reasonable Force	7
Isolation and One-to-One Working	7
Grooming	8
Infatuations and Crushes	8
Recognising Possible Signs and Indicators of Abuse	9
What to do in the event of a safeguarding concern / suspicion / disclosure / allegation	10
Who will conduct the investigation?	11
Effective Reporting and Procedures and Process steps and Record Keeping	12
Staff Training, induction and updates	12
Online Safety	13
Safer Recruitment	13
Preventing Abuse	13
Transferable Risk	14
Whistle Blowing	14
Unfounded Allegations	14
List of Appendices	15
Other policies / documents	15

Review, Implementation and updates tracking	15
Policy Updates	16

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 Sri KDU International School. 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 Sri KDU International School.

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

1

providers, contractors etc.

Philosophy

Sri KDU International School 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.

Sri KDU International School takes a 'child centred' approach and the best interests of the student are always considered as paramount.

Sri KDU International School believes that all children, regardless of age, gender, ability, culture, race, language or religion, have equal rights to be protected and safeguarded..

Sri KDU International School 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 Sri KDU International School staff in understanding safe professional practice; enabling them to adhere to all safeguarding related policies and procedures.
- To ensure that Sri KDU International School 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 Sri KDU campus) 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 Sri KDU International 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.

2

Key Roles

Title	Name
CEO KDU Schools	Dr Goh Chee Leong
Principal	George Piacentini
DSL in SKISS	Jasminder Kaur A/P Gurcharan Singh Deputy Headteacher in Secondary
DSL in SKIPS	Katie Tomlinson Head of Primary
Back up DSL in SKISS	Andrew Wyeth Head of Secondary
Back up DSL in SKIPS	Louise Wyeth - Deputy Headteacher in Primary Lisa Weatherup - Associate DSL - in Primary
HR manager	Lee Kin Seng

Responsibilities

The **CEO** 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 SRI KDU International 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 7– Safer Recruitment Checklist.

The **Principal** will ensure:

- This policy, and all related Safeguarding Policies and procedures, are implemented and followed by all Sri KDU International staff.
- DSLs and Back-up DSLs are named and allocated in sufficient number • DSLs and Back-up DSLs 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 and Back-up DSLs to carry out their roles effectively.
- Appropriate support and supervision for DSLs 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.

3

Heads of School will ensure:

- They attend the Safeguarding Committee meetings to discuss procedures, records, development, updates and training.
- They provide a written termly report to the Principal outlining Child Protection case numbers, actions, training and trends / patterns emerging.
- This policy, and all related Safeguarding Policies / procedures, are implemented effectively and followed by all Sri KDU International 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 **Designated Safeguarding Leads** 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 Principal / Headteacher 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 Sri KDU International 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 **Back-up DSLs** 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 SKIS Staff will:

- Be committed to the expectation that the welfare and wellbeing of Sri KDU International 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.
- 4
- 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 Sri KDU International policies listed at the end of this policy.
 - Follow the guidelines and procedures detailed in this policy, and all related Sri KDU International 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

SKIS 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 the boundaries between appropriate and inappropriate behaviour in adults and 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.

5

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. Sri KDU International 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 Sri KDU international 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 within Appendix 1 (Definitions and Types of Abuse) and Appendix 5 (Recording and Reporting Form)

Students who are living with Guardians or thought to be 'home alone' The Sri KDU International 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 Peer on Peer Abuse Policy - Appendix 12.

6

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 Sri KDU International Staff who work in the PE / swimming department will undertake training specific to this role.

Sri KDU 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

7

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 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 Sri KDU International 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 3 – 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 Principal 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 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. 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.

8

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

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

- 1) Bringing in gifts for the staff member.
- 2) Seeking opportunities to speak to the member of staff alone.
- 3) Going against school rules to be near to the member of staff, or be alone with them.
- 4) Abnormal / increased level of contact for reasons not related to school.
- 5) Asking a member of staff to be 'friends' on social media.
- 6) 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 6 – 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 Sri KDU International School 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.
- Truanting, 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.
- Unauthorised absences from school that do not have reasonable explanation or exhibit a suspicious pattern.

9

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 4 – Listening and Reporting

If one of the DSLs cannot be contacted, then a Back-up DSL 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 made in writing. If they are done by phone, a written report of the telephone conversation should be made. 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 should not use the excuse of 'couldn't find the correct form' as an excuse for not writing down a concern. If the correct form cannot be found, then any paper should be used and a cover form attached to this as soon as possible. The Safeguarding reporting forms can be found on the walls in the DSLs and Back-up DSLs workspaces / offices. The reporting form is Appendix 5 of this policy. When working remotely, please write the report on a piece of paper and screen shot this to a DSL, keep safe and deliver to the DSL in person on return to physical school.

If the allegation or suspicion is about a DSL, the 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.

10

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 4 - 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 Principal and / or the other DSLs 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 Principal.
4. If necessary, the Principal and HR Manager suspend 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 Principal will notify the CEO of Sri KDU Schools 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.
11. All child protection reports and information on individual students should be kept in a sealed envelope in the student's file and held for 10 years.

Record Keeping

As stated above, Child Protection records will be kept for 10 years in hard copy. Records will be kept in a locked cabinet and only the DSLs and Principal will have access to the keys for these locked cabinets. Records will be passed to a student's next school on leaving if deemed appropriate or necessary to do so. If copies of Child Protection records are passed, a declaration of this will be signed by the DSL at Sri KDU International as well as the DSL to which they were passed in the next school. The forms relating to this can be found as Appendix 10a of this Policy. Only copies of records will be passed on. The original records

will remain at Sri KDU International.

If a student who has joined the school within the last 12 months, begins to cause concerns and reports are made of a safeguarding nature, the DSLs will contact the student's previous schools and do their best to find out if there were any previous Child Protection concerns / records. The request Form / Letter for this is Appendix 10.

An electronic summary file will be kept of all safeguarding concerns including referrals to the school Counsellor and forms submitted by staff. Only DSLs and the Principal will have access to this file.

Staff Training, induction and updates

It is the policy of Sri KDU International School 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. The standard training schedule is listed below but will be supplemented as necessary in response to need.

Term 1 2021 / 2022	
August	Induction basic training for all new staff : Child Protection for International Schools (Educare Level 2)
August	Training for all Staff: Summary of Child Protection Policy including roles, new sections and appendixes, reporting systems. Staff Code of Conduct Whistle Blowing Policy
Term 1 - Twilight 2	Peer on Peer Abuse – SKIPS and SKISS separate (JSa) Affluent Neglect – SKIS (LWe)
7 Minute Briefings	<ul style="list-style-type: none"> • August - Malaysia Law (New staff only) KTo • September - Keeping Children Safe Whilst Working Online LWy • November - KCSIE changes from September 2021 KTo TBC
Term 2 2021 / 2022	
January (pending return of outside providers within the school environment)	Briefing for outside providers 1 hour face to face All contracted outside providers will be briefed on the following aspects: 1) Safeguarding Policy with appendixes (focus on grooming behaviour, use of social media, appropriate boundaries and use of technology for contacting and communicating) 2) Expectations and Code of Conduct 3) Whistle Blowing Policy 4) Police clearance forms, qualifications, references

12

7 Minute Briefings	<ul style="list-style-type: none"> • January – Gender Equality TBC AWy • March – online abuse - LWy
Term 3 2021 / 2022	

Term 3 - Twilight 5	Review of Student Centred Safeguarding Programme – SKIPS and SKISS separately.
7 Minute Briefings	<ul style="list-style-type: none"> • May – Grooming - KTo • June - Expectations of conduct on residential trips - GPi

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

Sri KDU International 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 wifi). 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 7 – Safer Recruitment Checklist.

Preventing abuse

At Sri KDU International 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-judgemental 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 / wifi 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:

- 1) Any incidents they witness of other members of staff which they believe could indicate that the person is unsuitable to work with children.
- 2) 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 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	Grooming
4	Listening and Reporting
5	Reporting and Recording Form
5a	Reporting Body Map
6	Guidance for identifying and dealing with 'crushes' / infatuations
7	Safer Recruitment Checklist
8	Swimming and PE Safeguarding
9	Acknowledgement slip for receiving Child Protection Policy / training
10	Request to Previous School for Safeguarding Information
10a	Receipt for giving / receiving CP information and records
11	Malaysian Law
12	Peer on Peer 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.

15

Last full review: August 2020 (Katie Tomlinson DSL)

Implementation Date: August 2020

Next full review: August 2022

Policy updates:

- October 2020
All KCSiE September 2020 changes applied
(Katie Tomlinson DSL)
- November 2020
Addition of Malaysian Law reference and Appendix 11
(Katie Tomlinson DSL)
- August 2021
Addition of 'Peer-on-Peer' abuse paragraph
Update to training section.
(Katie Tomlinson DSL)

