Safeguarding and Child Protection Policy

Name of Policy:	Safeguarding and Child Protection Policy
Date of Policy Revision:	June 2026
Revised by:	Deputy Principal with DSLs
Approved by:	Board of Governors
Date approved: (Revised)	Summer 2026
Date of next revision: By whom:	June 2027 Safeguarding Committee
Policy Location:	Whole School Drive / Policies

Rationale of Safeguarding and Child Protection Policy

At Stonyhurst International School, we recognise our duty and responsibility to protect and safeguard the interests of all children. The School recognises that effective Child Protection practice requires sound procedures, good inter-agency co-operation and a workforce that is competent and confident in recognising and responding to Child Protection situations.

This policy provides the basis for good practice within the school for Child Protection work, and provides a framework to ensure that all practice in the area of Child Protection is consistent and will enable every child to be healthy and stay safe. It also seeks to make the professional responsibilities clear to all staff to ensure that statutory and other duties are fully met.

The welfare of the child is paramount, and as such this policy will be reviewed on an annual basis and following case by case self-evaluation.

Terminology and Definitions

Safeguarding: The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.

Abuse: A violation of an individual's human and civil rights by any other person or persons.

Child Abuse: Any act of commission or commission by a parent or guardian (or any other person) which would endanger or impair the child's physical or emotional wellbeing or that are judged by a mixture of community values and professionals to be inappropriate.

Categories of Abuse: Physical Abuse; Neglect; Sexual Abuse; Emotional and Psychological Abuse.

Significant Risk of Harm: 'Significant risk of harm' is the threshold which justifies compulsory intervention in the best interests of the child.

Best Interests of the Child: The principle, 'in the best interests of the child' guides internal policies and service provision for children and young persons, including the area of Child Protection.

Responsibilities

Child abuse occurs in all communities regardless of the gender of the child or perpetrator, wealth, religion, culture or ethnicity. Schools as institutions working with children and young people, become more attractive to those who wish to exploit or abuse children. All members of the school community have a duty to safeguard and promote the welfare of children. All members of the school community must model appropriate and healthy relationships with children.

The Board of Governors

The Board of Governors will approve this policy at each review, ensure it complies with the law and hold the Principal to account for its implementation.

The Board of Governors will appoint a senior board level (or equivalent) lead [or, link governor] to monitor the effectiveness of this policy in conjunction with the full Board of Governors. This is always a different person from the DSL.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate.

Any Governor who is on School grounds, or attends any School events, in any capacity, where children are present, must undertake the 'volunteer safeguarding training' to ensure a consistent approach to all members of the School community.

All Governors will read

All Governors will read the Child Protection and Safeguarding Policy and the Keeping Children Safe in Education document and sign the Declaration of Acceptance.

The Senior Leadership Team

The Senior Leadership Team is responsible for formulating and implementing policy and procedures which;

- Prevent unsuitable people from working with children and young people i.e. safe recruitment procedures and single central vetting records.
- Promote safe practices and challenge poor and unsafe practices in the whole school context.
- Identify and support a Designated Person(s) for Child Protection who is a member of the senior leadership team.
- Lead a team which identifies instances where there are grounds for concern about a child's welfare and initiate appropriate action/intervention to keep them safe.
- Contribute to effective partnership working between all those involved with providing services for children.

The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) in the first instance is the Assistant Head (Pastoral) for the school in question, e.g. if an incident happened in the Junior School the first port of call is the Assistant Head of Junior School Pastoral. If unavailable, the other school's Assistant Head may support or alternatively the Deputy Designated Safeguarding Lead (Whole School) This team forms the Safeguarding Committee who meet regularly to discuss issues that have arisen and to keep procedures and policies updated. The Deputy Principal and School Principal have also received Level 3 Safeguarding training and may support the Safeguarding Committee as needed. The Link Governor for Safeguarding is the Chair of the Board of Governors.

For the academic year 2026-2027 the roles and responsibilities above are held by:

- Chair of Board of Governors and Board Safeguarding Lead - Michael Sng

- School Principal- Richard Moore
- Deputy Principal - Emma-Marie Horridge
- Assistant Head, Head of Senior School Pastoral - Helen Evans (DSL)
- Assistant Head, Head of Junior School Pastoral - Samuel Williams (DSL)
- Deputy Safeguarding Officer - Esme Melody
- Nominated External Safeguarding Committee Member - Sue-Ann Robless

The DSL is responsible for the schools' approach to:

- Policy
- Practice
- Procedures
- Professional development

Specifically, the DSL will:

- Ensure that all staff understand their responsibilities in relation to child protection and know who is responsible for child protection issues.
- Maintain staff awareness and confidence regarding child protection procedures and ensure new staff are aware of these procedures – coordinate training in this respect.
- Coordinate action where child abuse is suspected.
- Attend case conferences or nominate an appropriate member of staff to attend on their behalf.
- Maintain and update Child Protection records including outcomes of case conferences and other sensitive information - to be secured (double lock) in a confidential file and disseminated only on a 'need to know basis'. The secure file is maintained by the Assistant Head Pastoral for the respective school.
- Keep up to date with current practice by participating in training at the highest level.

All Staff

All staff have a shared responsibility to help keep children and young people safe by:

- Providing a safe environment for children and young people.
- Model safe pupil staff relationships at all times.
- Identifying young people who are at significant risk of harm.
- Taking appropriate action with the aim of making sure that children are kept safe both at home and at school.
- Understanding school policy and procedures related to child protection and safeguarding and knowing who is

the Designated Person for Child Protection.

- Contributing to professional training and awareness of Child Protection issues.
- All staff will have read this policy and signed to confirm this.

Keeping Children Safe in Education (KCSIE), as updated annually by the UK Department for Education, states: "Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child."

Prevention Awareness

Prevention is better than having to respond to actual abuse or malpractice. The school should actively engage in reflective practices with all staff to safeguard children, to identify vulnerabilities in current practices, and to learn from experiences.

Key Areas of Reflection
Reflective questions might be: How effective are our current practices, policies and procedures in the following areas? How does our school culture help or hinder child protection in the following areas?

Stages of Effective Child Protection in School

1. Prevention
Staff and managers create an environment where children's rights are respected and abuse prevented. Policies such as Safer Recruitment, Anti-Bullying and Harassment, Staff Conduct, Parental Conduct, and Intimate Care Policy have review systems in place.

2. Awareness and Sensitisation
Ensure all staff, pupils and parents are aware of the problem of child abuse, sexual exploitation and risks to children, aware of the procedure and duties to provide a safety net for children.

3. Reporting
Everyone in the school must be clear about their duty to report malpractice and/or indications of abuse without delay.

4. Monitoring
A single point of contact for all child protection concerns to gain an overview of emerging patterns.

5. Responding
The school has a clear protocol for responding to child safety concerns and actual abuse, appropriate personnel and structures in place.

6. Follow up
The school provides support where needed and an opportunity to learn, reflect, develop and review.

Safeguarding Risk Assessments and Temporary Restrictions on Attendance

There may be exceptional circumstances where, following a safeguarding risk assessment, the school determines that a pupil's immediate health, safety or wellbeing cannot be safely supported within the school environment. This may include, but is not limited to, situations involving significant mental health concerns, suicidal ideation, serious self-harm, eating disorders, acute medical concerns affecting safety, or other safeguarding risks.

In such circumstances, the school may require that the pupil remains away from school on a temporary basis while appropriate medical assessment, treatment or specialist advice is obtained. This is a safeguarding measure designed to protect the pupil and those around them and is not a disciplinary sanction, suspension or exclusion.

Decisions will be made on an individual basis by the Designated Safeguarding Lead in consultation with the Deputy Principal and/or Principal where appropriate, taking into account professional advice, the school's risk assessment, and the best interests of the child. The school will work collaboratively with parents and relevant professionals to support the pupil's safe return to education as soon as it is appropriate to do so.

PROCESS FOR REPORTING CHILD PROTECTION CONCERN:

Complete CPOMS record immediately, no later than 24 hours after disclosure or concern raised/ complete a handwritten record in the absence of CPOMS on a named and dated piece of paper that is handed directly to one of the DSL.

Report to the DSL in person where possible.

DSL will be in contact within 24 hours to follow up with information where deemed appropriate or necessary. You may not know the outcome of the disclosure but will be told your concern has been received and acted on.

Safeguarding concerns are assessed, escalated and managed in line with the school's **Safeguarding Escalation Standard Operating Procedure (SOP)**. The SOP sets out clear thresholds, roles and responsibilities, decision-making processes, and expectations for record-keeping, ensuring that concerns are responded to promptly, proportionately and consistently. All staff are required to follow this framework, and detailed operational guidance is provided in the SOP (see Appendix 5).

If there is **any suspected or reported cases of the concerns below, this is considered an immediate risk of harm and they must be reported immediately, in person, to a DSL:**
Disclosed or suspected:
Neglect
Sexual Abuse
Physical Abuse

Psychological/Emotional Abuse
Grooming
Female Genital Mutilation/Cutting
Alcohol and Drug Use
Self Harm
Suicidal Ideation
**See appendix 4 for types of abuse and further information*

Abuse Awareness- Malaysian Context

Malaysia has in recent years taken significant steps to modernise their National Child Protection agenda. Significantly in 1994 Malaysia signed up to the UN Convention for the Rights of the Child. The intention to strengthen its child protection infrastructure was brought another step forward with Laws of Malaysia Act 611 Children Act 2001. The act consolidated and amended the laws relating to care and protection of children. As a result Child Protection teams have been established nationally and regionally. Each Region has a 'Protector' appointed to advise and report to over child protection concerns.

The new act states: 'We recognize 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': 'Recognizing that a child is not only a crucial component of such a society but also the key to its survival, development and prosperity.'

There is no provision to report all incidents of physical abuse to the Police but there is a responsibility to report criminal assaults. As an International School physical abuse will be considered and dealt with through child protection procedures. The police will be informed if injuries are witnessed that are beyond what an objective person would consider acceptable for parental physical chastisement.

School staff are forbidden to physically chastise a child as it contravenes boundaries of acceptable practice and goes against professional and ethical codes of conduct.

All instances of sexual abuse will be reported to the Protector.

In an International context sexual abuse in some cultures has additional layers of impact and consequence for the victim. The stigmatisation of not being a virgin for example in some cultures will have a greater impact culturally on the family, marriage prospects for the girl, family reputation etc. than for similar cases in the West. This can make reporting and disclosure of abuse more difficult and potentially more secretive. Decision making around such situations should be done in close co-operation with the parents or guardians of a child alongside a clear understanding of the child's wishes in the matter.

Abuse Awareness- An International School Context

Staff are often more transient and international than most mainstream national schools which makes recruitment and reference checking more difficult. This creates a potential vulnerability in the safeguarding systems.

Several countries do not provide police checking services and other countries only provide domestic checks. This

means that abusive staff members can potentially move to another school with relative impunity creating another vulnerability for future schools. Our responsibility to check new staff and report abuses to CIS helps protect our own and future children.

International school communities tend to have more families that move often and are separated from their extended families in their home-of-record. When abuse is within the family, the transient life-style then increases the risk to international school pupils who tend not to have access to consistent outside resources, and therefore cannot get help.

As an International School we have a responsibility to ensure our child protection and safeguarding policies and procedures are as robust as we can make them.

Guiding Principles

Dealing with Safe School and Safeguarding issues requires some guiding principles. Cases are invariably different and each case is unique. Even the best and most thorough guidance cannot legislate for the individual circumstances of every case. For this reason guiding principles assist the process of thinking and decision making when considering good safeguarding choices.

Confidentiality

Due to the sensitive nature of child welfare for staff, pupils and stakeholders confidentiality must be maintained. Those involved in investigations or procedures should be kept to a minimum. People with support roles should be those who are not connected to the case or the investigation. Staff supporting individual children do not need to know and should not seek to know intimate details of the case. In some cases key staff may be called upon to provide extra support to a child in their role as a caring adult. If a child makes a disclosure they need to be informed clearly who information will be passed to. Clear guidelines on confidentiality vs duty to report are essential for all staff in the event of a disclosure of abuse.

Protection

The emphasis in all investigations and actions is the protection of the child. The child needs to be protected from further potential abuse and measures taken to safeguard the child e.g. suspension of staff, restriction of visitor access to school etc. Staff, pupils and parents should understand this type of action as a protective measure and not a disciplinary measure or assumption of guilt. A clear and fair process also aims to protect the staff member by ensuring an objective investigation is carried out and a fair process followed. Trust in the system is highly important as a protective factor because a system that is perceived as unfair or punitive will affect people's willingness to report and create its own vulnerabilities.

Best Interests of the Child

In child welfare cases there are often several stakeholders with conflicting priorities. Decisions and processes should at all times be conducted with the best interests of the child in mind.

Child Centred Planning

Planning and processes need to be child centred at all times. The child's wishes need to be taken into consideration and their welfare must be considered paramount throughout the process.

Where safeguarding concerns indicate that a pupil may require urgent medical, psychological or specialist assessment before it is safe for them to attend school, parents are expected to engage with appropriate professional services. The school will work collaboratively with families wherever possible; however, where appropriate assessment or treatment is declined and the school is unable to manage the safeguarding risks safely, the school will determine the appropriate next steps in accordance with its Safeguarding, SEND and Expulsions and Removals Policies.

Accountability and Responsibility
A whole school approach is essential for effective safeguarding. Everyone is accountable and responsible for reporting, whistle blowing, safe practice, safeguarding, reflecting etc. Roles and responsibilities will differ at various points of the process. Good governance is required and clear transparent processes are essential.

Preventative Measures: Dissemination / Awareness-raising
Safe School training will be mandatory staff training. All staff, children and parents need to be made aware of the Child Protection and Safeguarding Policy and where to find it. Safe School information should be displayed in a clear format using words and imagery which is understandable to all stakeholders.

All staff should be trained in how to log concerns/incidents on CPOMS.

New staff should receive Safeguarding School training during their Induction Programme. Safeguarding School training should include all staff members who have contact with children including Security, Maintenance, Food Services etc.

To help ensure accountability all current staff, volunteers and internship pupils should be given a personal copy of the Safeguarding Child Protection Policy and sign a 'Declaration of Acceptance'. As a protective measure new staff should sign the declaration prior to employment.

The board needs to ratify / endorse the policy.

An anonymous system of reporting to the DSL is available via our Safeguarding posters, which can be accessed by pupils, parents and staff, as well as visitors to the school..

The number for Child-Line 15999 (Malaysian Royal Police) is included on all safeguarding posters from August 2025

Pupils need an awareness of child welfare and personal safety delivered through PSHE classes.

Cyberbullying and online exploitation policy needs to be developed and awareness encouraged for pupils, staff and parents.

Recruitment and Selection
The Safer Recruitment Policy will be followed for all appointments.

Building Child Safeguarding into Management Systems and Processes
Safeguarding Child Protection Policy must be incorporated into all existing systems and processes that have any bearing on the safeguarding of children so that an environment is established where the rights of children are respected and where abuse in any form is not tolerated.

The Safeguarding Child Protection Policy should be reflected in all human resource and management arrangements that define or determine how staff and other representatives carry out their work, including job descriptions, performance management systems, behaviour management procedures and staff disciplinary procedures.

Children and their parents are made aware of the systems that exist to raise a concern or a complaint.

Where Stonyhurst International School is responsible for providing activities or services for children, pre-planning will ensure risks are identified and plans in place to manage those risks. When Stonyhurst International School uses

external agencies e.g. field trips, we will carry out due diligence to ensure the organisation concerned is qualified to the level required for their activities

Engagement with children and their carers for the purposes of marketing should not exploit the child or carer, nor increase their vulnerability, or place them at risk.

All activities, especially activities involving staff, visitors or parents having direct contact with individuals or groups of children must be assessed to make sure that any child safeguarding risks are identified and adequate controls developed.

Learning and Development

Staff, parents and pupils should be supported to develop child safeguarding skills, knowledge and experience appropriate to their role in the organisation.

Safeguarding Child Protection Policy awareness training will be mandatory and include induction training and mandatory refresher training for all staff.

Information and Communication Technologies

Guidance is required which governs the appropriate use of information and communication technologies such as the internet, websites, social networking sites, etc. to ensure that children are not put at risk and aware of the risks. This guidance should cover staff and children who utilise the technologies. Awareness of cybercrime and online safety measures implemented where children have access to information technologies for staff and children.

Ensure vigilance and consistency in dorms and all other areas of school regarding access to books, magazines, films and materials, (hard copies or online) that are reasonably considered to be harmful, pornographic or beyond the child's age and stage of development.

Creating a Protective Environment

The creation of a protective environment requires the commitment of every staff member, parent and partner. It is not the job of one person or a select group of people.

Staff Protection

A common concern for staff is the fear of being subject to a false allegation. For this reason it is especially important that staff have trust in the system that not only takes measures to protect children but also protects staff by responding fairly and objectively to concerns that are raised.

A thorough investigation aims to screen out false allegations by cross checking witness accounts, times, dates and staff / pupil movements. Often false allegations lose credibility due to lack of a cohesive timeline. This is generally not true of real issues.

Staff Vulnerability

Several staff who have found themselves in difficult situations in other organisations have often allowed themselves to be compromised by either placing themselves at risk or through a degree of naivety.

Awareness of personal and professional boundaries is a good start as well as being aware of what might be a situation that could be misconstrued by others. It is a good idea to be aware of grooming behaviours so that these situations and boundary transgressions can be proactively avoided.

The following are some key areas taken from the Professional Charter:-

- Plan and organise the work and the workplace so as to minimise risks
- As far as possible, be visible in working with children

In general, it is inappropriate to:

- Spend excessive time alone with children away from others
- Take children to your home, especially where they will be alone with you
- Buy gifts for a child to the exclusion of others.

Staff and others must never:

- Hit or otherwise physically assault or physically abuse children
- Develop physical/sexual relationships with children
- Develop relationships with children which could in any way be deemed exploitative or abusive
- Act in ways that may be abusive or may place a child at risk of abuse.

Maintaining professional boundaries within a school setting

It is of utmost importance that staff maintain appropriate professional boundaries with pupils:

Understanding the role:

- Have a clear definition and understanding of the role of a Teacher/Learning Assistant/Staff member. Establish the professional nature of the relationship with pupils, which is fundamentally different from a peer or friend relationship.

Maintain Objectivity:

- Approach all interactions with pupils impartially. Avoid favouritism or singling out pupils for special treatment, as this can lead to misunderstandings or perceptions of bias.

Physical Boundaries:

- Exercise caution with physical contact. While you think some situations may call for it (e.g. providing comfort in a distressing situation), always ensure it is appropriate, consensual, and limited to what is necessary. Be aware of and respect personal space. Never isolate yourself in a room with a pupil.

Communication:

- Keep communication with pupils professional at all times. Use appropriate school-approved channels of communication through school software, use appropriate language and tone, and avoid engaging in conversations that could be seen as overly personal or inappropriate. This applies to both in-person and digital communication (e.g. email, social media).

Social Media and Online Interaction:

- Avoid connecting with pupils on personal social media accounts. At no point should you have pupils' personal contact details across any social media platform or furthermore, contact or communicate with them. Use school-approved communication channels for interacting with pupils online. Be mindful of your digital footprint and maintain professional boundaries in all online interactions. If a pupil contacts you, report it immediately.

Personal Information:

- Do not share personal information with pupils. This includes details about your personal life, beliefs, or opinions that are unrelated to your role. Sharing personal information can blur the lines between professional and personal relationships.

Interactions:

- Whenever possible, conduct one-on-one interactions with pupils in visible or public areas within the school and when necessary, you must be supported by another member of staff. If privacy is required (e.g. during a sensitive conversation), ensure that a door remains open and another staff member is aware of the meeting.

After-School Activities:

- When participating in or supervising extracurricular activities, maintain the same professional standards as during school hours. Boundaries should not be relaxed outside of regular school settings.

Handling Disclosures:

- If a pupil confides in you about a personal issue, listen empathetically but do not promise confidentiality. Inform them that you must report certain disclosures to the appropriate staff within school (in line with our school staffing structure - up to and including DSLs) to ensure their safety.

Awareness and Reflection:

- Regularly reflect on your interactions with pupils to ensure you are maintaining professional boundaries. Seek feedback and guidance from colleagues (your teachers) or SLT or DSL if unsure about the appropriateness of certain behaviours or situations.

By adhering to these guidelines, Teachers/Learning Assistants can foster a safe and respectful environment for pupils while protecting themselves from potential misunderstandings or allegations.

Staff and others must avoid actions or behaviour that could be construed as poor practice or potentially abusive. For example, they should never:

- Use language, make suggestions or offer advice which is inappropriate, offensive or abusive
- Behave physically in a manner or dress in a manner which is inappropriate or sexually provocative
- Have a child/children with whom they are working to stay overnight at their home unsupervised or without permission
- Sleep in the same room or bed as a child with whom they are working
- Do things for children of a personal nature that they can do for themselves
- Condone, or participate in, behaviour of children which is illegal, unsafe or abusive
- Tell racist, sexist or other discriminatory jokes

Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment towards, or favour particular children to the exclusion of others.

If you find yourself in a position where you will potentially leave yourself vulnerable, protect yourself by ensuring you notify a Senior Staff member and get permission.

Note: In an International School it is normal and acceptable for staff children to play socially together, have playdates and sleepovers with their friends. This should be encouraged as part of the child's normal social development. There is a significant difference between what can reasonably be seen as social interaction between children and families and situations that compromise a professional boundary.

Child Protection Procedure: Safe School Reporting Process
If you have cause to suspect abuse or have any other Child Protection or Safeguarding concerns all staff, pupils, parents or other stakeholders have a duty to report without delay. Furthermore if you observe an indicator of abuse, receive a disclosure of abuse or an allegation of abuse or if you have knowledge which causes you to believe harm may be occurring you have a duty to report to the DSL without delay.

If you receive information which is 'child protection' in nature but you doubt its credibility you still have a duty to report, accurately, completely and without delay. Staff who knowingly withhold information related to child safety may face disciplinary action.

Disclosure of Abuse Perpetrated Outside of School
If a member of staff suspects a child has been abused or neglected by someone outside of school, the following procedures should be implemented:

I. Staff will report concerns immediately to the Designated Safeguarding Lead (DSL). They will be required to record observations that will contribute to the Record of Child Protection Concern. The DSL records all information and is responsible for keeping all records and evidence safe.

II. In the event of suspected sexual abuse happening, it is a requirement for the school to contact the Child Protection Service (CPS) or the Police. For cases happening within the context of the family, the family should not be alerted to the allegations being made and the report can either be made with the police or CPS. For sexual abuse cases happening outside the context of the family, the family should be informed of the incident and a report needs to be made to the CPS/Police. The school should record any disclosure factually. Note - The 'paramountcy principle' supports agencies making decisions in the best interests of the child, and this may mean not disclosing information to parents.

III. In the event of other forms of abuse, the DSL will be committed to taking action and arranging consultation with the Head of School. In collaboration with the Head of School, when deemed appropriate after further investigation, the DSL will inform the Child Protection Service. The DSL will keep the teacher up to date with developments on a 'need to know' basis.

IV. If there are obvious signs of harm, the pupil will be taken to the School Nurse immediately. If the pupil is in need of urgent medical attention, he/she should be taken to the Hospital. If it is not possible or advisable to obtain parent consent the CPS should be contacted for consultation. Where we suspect the abuse has occurred or is about to occur and the child is unsafe and in imminent risk of further harm, we are committed to reporting the matter to the Child Protection Service Helpline or the Police.

V. Where we suspect that the abuse has been perpetrated by someone close to the family or within the family network, the DSL or a designated member of staff will contact the family and discuss ways on how the pupil could be kept safe and managed more appropriately. Full consideration as to whether contact with the immediate family would increase the risk of harm should be given.

Disclosure of Alleged Abuse Perpetrated by a Staff Member

If staff, parents or a pupil believes that a member of staff has behaved inappropriately with a pupil within or outside of the school the following steps should be taken:

I. Meeting with pupil/Alleged Victim - with any of the Designated Safeguarding Committee. The information will be communicated directly to the School Principal. If there is more than one pupil who has been a victim of abuse, the pupils will be interviewed individually. A summary of what was learned from investigations will be made by the DSL to the Principal, and logged on the school reporting system. Use of Appendix 1 and 2 will be used where necessary.

II. The DSL, Deputy Principal, or School Principal will coordinate interviews with any bystanders/witnesses and notes taken from evidence.

III. Meeting with Accused Staff Member - The accused staff member will be requested to attend a meeting with the School Principal and questioned regarding the accusations being made. The meeting will be documented. Notes from this meeting will be recorded and stored in a secure location.

IV. Contact Parent/Caregivers- Parents/Caregivers of the pupil/s being questioned will be contacted by the School Principal and informed of the meetings that took place. The alleged victim's parents will be invited into school

to discuss the issue face to face.

V. Consideration will be given as to whether that member of staff should face suspension pending further investigations.

VI. Communication with Child Protection Agency - The School Principal will report the matter to the Child Protection Services Helpline or the Police after careful consideration of the seriousness of the offence is given. Parents of pupil victims will be made aware of their right to do this also. The School Principal will keep those directly concerned with the case up to date with developments.

Disclosure of Abuse by Another pupil

If a pupil in the school is suspected of abusing another pupil, the following steps should take place

I. Initial Record of Concern- The adult who has suspicions of a pupil being abused by another child, or is approached directly by a pupil/s about being abused, completes a written statement, and handed it to the DSL. The Deputy Principal/Principal should be informed by the DSL.

II. Meeting with Victim/s- A member of the Designated Safeguarding Team will meet with the victim directly. In the case of more than one victim, children will be interviewed individually and a summary of what was learned from investigations will be made.

III. Meeting with Bystanders- The DSL, Deputy Principal, or School Principal will communicate with possible witnesses individually to the abuse that has occurred.

IV. Meeting with Accused pupil/s– The DSL/Deputy Principal/School Principal will communicate with the pupil accused of causing abuse to a fellow pupil or pupils. If there is more than one pupil who has taken part in an incident involving the abuse of other pupils, the pupils accused will be met individually. Notes from this meeting will be recorded and coordinated by the DSL.

V. Consultation - Consultation and agreement between the DSL, Deputy Principal, or School Principal

VI. Parents of Victims Contacted– Parents/Caregivers of the pupil/s who were abused will be contacted and informed of the meetings that took place. The course of action will be explained regarding the pupil/s who carried out the abuse on their child and an offer of counselling for their child made.

VII. Parents of Accused pupil/s Contacted– If abuse by pupil/s proves to be beyond doubt, the pupil/s are collected from wherever they are on the school campus and asked to bring their bags to the school office. The parents / caregivers of pupil/s accused of abuse towards another pupil/s will be contacted to attend a meeting with a member of the Designated Safeguarding Team before being asked to take their child/children home for the rest of the day. An offer of counselling for their child will be made. Where the parents cannot attend a meeting in school, communication will be made via telephone or email.

VIII. Action- The School will be committed to taking action in line with the school's behaviour policy. In extreme cases, expulsions will be considered. Further consequences including an apology letter to victim/s and exclusion from upcoming events will be considered.

IX. Communication with Child Protection Agency - The School Principal may report the matter to Child Protection Service Helpline (office hours) or the Police after careful consideration of the seriousness of

offence is given. Parents of pupil victims will be made aware of their right to do this also.

Training

What	Who	When
Level 1 safeguarding	All Staff, employees, Volunteers/ External agencies, businesses, organisations and consultants	August Induction Week Prior to children on campus
Level 2 safeguarding	All staff working 1:1 with children	August Induction Week Prior to children on campus
Level 3 safeguarding	Designated Safeguarding Team Deputy Principal, School Principal	(July/August) Renewed each academic year as required
Safer Recruitment	Heads of School, HR Manager, Bursar, (DSL)	August renewal- as required

All training processes and procedures should be revised in accordance with certificate validity, and at the most every three years.

Managing Disclosure

The disclosure of child abuse by a child to an adult is likely to be one of the hardest conversations that all parties will face. It is essential that we show empathy and professionalism in our approach to managing such conversations, mindful that what is said and what is recorded could influence criminal proceedings at a later date.

The following professional guidelines protect both the child and the person who is receiving the disclosure: -

I. No Promise of Confidentiality - Staff should never give pupils or adults an absolute guarantee of confidentiality but must ensure that the information is disclosed only to the people who need to know.

II. Listen Without Judgement - Listen, allow the pupil to finish without directly questioning, leading or stopping them. On no account should a pupil be asked to demonstrate the abuse. Let them tell you what they want to and no more. They may need to disclose to a social worker, police officer or other specialist later and too much detail now may interfere with later investigation.

III. Take Notes - Write down notes, including date and time of the interview and sign the notes. Record as much as you can remember, as soon as possible (preferably immediately) afterwards, using the pupils' own words and pass it to the DCPC for the school.

IV. Empathy - Remember that it may be very traumatic for a pupil to recall and describe events.

V. Next Steps - When the pupil has finished, make sure they feel secure and explain what you are going to do next.

VI. Professional - stay calm and convey this through word and action; reassure the child or young person that you are taking what they have to say seriously.

Record Keeping
Initial concerns or issues will be logged on CPOMS. All members of academic and admin staff will be able to use CPOMS to log concerns. The DSL will have access to all concerns and logs.

If unable to record on CPOMS, the member of staff should use Appendix 1 to record all information concerning a suspicion, allegation or disclosure of child abuse. All prior notes should be attached to this document. Appendix 2 should contain a body map image and the actions the school took and the actions the school decided not to take with explanation. This is to be completed only in the absence of it not being recorded on the CPOMS software.

All records of Child Protection allegations, suspicions, or disclosures are centrally kept by the DSL – both electronic ('Tier 2 Safeguarding Register') which is kept in an electronic secure location open to the Level 3 Safeguarding Team only.

Guidance:

- Keep notes of any concerns, giving the issues, dates etc, but be discreet whilst talking to the pupil - they may find note taking at the time disconcerting.
- Keep all notes factual.
- Do not read your summary back to the victim as this can repeat the trauma.
- If you have a discussion with a child, keep a record of timing, setting, personnel present, what was said and any action taken/not taken.
- Keep a record of any subsequent events.

Intimate Care Procedures
If a young child needs the assistance of an adult to change their underwear or remove their underclothes due to wetting themselves or to investigate an injury, it must be done in accordance with our Intimate Care Policy.

Sharing a Concern about Staff (Whistleblowing)
Staff should acknowledge their individual responsibility to bring matters of concern to the attention of senior management and/or relevant agencies. Although this can be difficult this is particularly important where the welfare of children may be at risk.

Staff may be the first to recognise that something is wrong but may not feel able to express their concerns out of a feeling that this would be disloyal to colleagues, or may fear subsequent harassment or victimisation. These feelings, however natural, must never result in a child or young person continuing to be unnecessarily at risk. Remember it is often the most vulnerable children or young people who are targeted. These children need staff to safeguard their welfare in good faith.

Reasons for sharing a concern:

- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour.

- To prevent the problem worsening or widening.
- To protect or reduce risks to others.
- To prevent becoming implicated yourself.

What stops people from sharing a concern

- Fear of starting a chain of events which spirals out of control.
- Disrupting work or a project.
- Fear of getting it wrong.
- Fear of repercussions or damaging careers.
- Fear of not being believed.

How to raise a concern

Staff should voice concerns, suspicions or uneasiness as soon as they can. The earlier a concern is expressed, the easier and sooner action can be taken. Staff should try to pinpoint exactly what practice is concerning and why, ensuring they are acting in good faith and not with malicious intent.

Concerns should be reported to the School Principal or a Designated Safeguarding Lead, who will in turn ensure the Principal is kept informed. Where possible, staff should put their concerns in writing, outlining the background and history, giving names, dates and places wherever they can.

Staff will receive a response from the School Principal, or the Designated Safeguarding Lead leading the investigation, to acknowledge that the concern has been received. They will not be contacted further routinely unless additional information is needed or they are required to provide further evidence. To protect all parties, details of ongoing investigations and outcomes are not shared with staff who make the allegation.

What happens next?

The School Principal, or the Designated Safeguarding Lead leading the investigation, will determine whether the allegation falls above or below the threshold of harm.

Concerns or allegations that may meet the threshold of harm include where staff have:

- Behaved in a way that has harmed a child or staff member, or may have harmed a child or staff member; and/or
- Possibly committed a criminal offence against or related to a child or staff member; and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

What is a low-level concern?

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
- Does not meet the threshold of harm or is otherwise not serious enough to consider a referral to the local authorities.

Examples of such behaviour could include, but are not limited to:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal mobile phone, contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating children or staff

It is crucial that all low-level concerns are shared with the School Principal and/or Designated Safeguarding Leads and are recorded and dealt with appropriately. Ensuring that low-level concerns are managed effectively also protects those working in or on behalf of the school from potential false allegations or misunderstandings.

Staff subject to a low-level concern should not be suspended unless there is a continued pattern of behaviour that raises the concern above the threshold of harm and meets the criteria outlined above. Accused staff should be given information on the nature and progress of any enquiries, where appropriate.

Suspension will not be an automatic response when an allegation is reported and will only be considered for allegations above the threshold of harm. All options to avoid suspension will be considered prior to taking that step. Only the School Principal will make a decision regarding suspension and will carefully consider whether the circumstances warrant suspension from contact with children while an investigation is ongoing. Suspension will be considered only where there is cause to believe a child or other children may be at risk of harm, or where the case is considered high risk. The school has a responsibility to protect staff from subsequent harassment or victimisation.

Outcomes and oversight

The School Principal, or the Designated Safeguarding Lead leading the investigation, will determine the outcome of an investigation using the following terms:

- **Substantiated**
- **Malicious**
- **False**
- **Unsubstantiated**
- **Unfounded**

The School Principal, or the Designated Safeguarding Lead leading the investigation, may consult with the Safeguarding Committee (which includes an impartial, external committee member) where appropriate. This may include situations where there is a pattern of low-level concerns or where an allegation is serious in nature and may fall above the threshold of harm. The Safeguarding Committee provides impartial advice to support decision-making prior to determining the outcome of an investigation.

Cases found to be false, unfounded, unsubstantiated or malicious will not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious will also not be included in references. Substantiated safeguarding allegations that meet the threshold of harm will be included in references, provided that the information is factual and does not include opinion.

All low-level concerns, regardless of outcome, are recorded and monitored by the School Principal and/or Designated Safeguarding Leads through a central Low-Level Concerns Log. This log provides senior oversight of concerns, enables patterns of behaviour to be identified over time, and ensures that concerns are responded to promptly, proportionately and consistently. The log records high-level factual information only. Detailed records and supporting documentation are retained separately and securely on a need-to-know basis.

Where a pattern of low-level concerns emerges, or where a concern escalates to meet the threshold of harm, the matter is managed and investigated in line with this policy.

Self-Reporting

There may be occasions where a member of staff has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so professional and personal support can be offered to the member of staff concerned. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children.

Safer Recruitment

See the Safer Recruitment Policy.

Single Central Record of Recruitment Vetting Checks

The Human Resources Department will keep and maintain a single central register of recruitment and vetting checks. The central list records all staff who are employed at the School, including casual staff, and those who provide additional teaching or instruction for pupils but who are not staff members, eg: specialist sports coaches.

The school ensures that it is satisfied with the level of criminal vetting for staff employed through an agency. The central record indicates when the following pre-employment checks were completed:

I. Identity checks
II. Health / Medical fitness
III. Qualification checks for any qualifications legally required for the job
IV. Criminal record check

It shall also indicate who undertook the checks and the date on which the check was completed or the relevant certificate obtained. The Human Resources Department will contact the appointing Manager to confirm that all paperwork has been received before a start date can be agreed.

Sports clubs and Extracurricular Activities

Clubs and extracurricular activities hosted by external bodies, e.g. Ignite, charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements. Paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to or the police, if necessary.

Volunteers in Class

Any person (faculty, volunteer, parent, coach, activities leader, etc.) that works directly with pupils has to be trained OR has to be supervised.

Given that the School will have numerous events and a wide variety of parent involvement we will be using the following approach regarding who is required to attend the training:

Volunteers who regularly work directly with pupils during or after school. *Regularly is defined as more than twice a year. *Directly is defined as interacting with children individually or in groups.	Child safeguarding training is required
Volunteers who do not regularly work with children or who only volunteer for one or two things a year.	Child safeguarding training is not required. Volunteers must be supervised by a trained member of staff.

Supervision means that they have to be in line of sight of a fully trained member of staff.
This means that people who have not been trained should not be alone with pupils and need to be supervised.

Extended School and Off-Site Arrangements

Please see trips policy. All safeguarding policies should continue to be followed.

Monitoring and Evaluation

This policy will be reviewed on the basis of experience and formally evaluated on an annual basis. The procedures contained within this policy will be monitored by regular stakeholder surveys, and professional evaluation of how child safety issues are addressed in school e.g. Curriculum reviews of PSHE; quality of related assemblies etc.

Resources / Further Information

- The UN Convention on the Rights of the Child – Unicef UK
- Unicef CEE / CIS – Child Protection
- The Child Protection System in England
    - Children Act 1989 (and amendment), which provides a framework for the care and protection of

children

- on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

- for the Early Years Foundation Stage.

- Social Services Department

1) Selangor
Tingkat 2, Bangunan Darul Ehsan,
No.3, Jalan Indah, Seksyen 14, 40000 Shah Alam
Person to contact: Mr. Zuhami
Contact no.: 03-5510 0929
Email:

2) Kuala Lumpur
Tingkat 9, Grand Seasons Avenue,
No 72, Jalan Pahang, 53000 Kuala Lumpur
Person to contact: Ms. Wan Noraidah
Contact no.: 03-2612 4000
Email:

3) Social Service Department (Head Office) for child protection
Children's Department
Aras 12
No. 55 Persiaran Perdana
Presint 4, 62100 Putrajaya
Person to contact: Ms. Nor Asikin
Contact No. 03-83232277
Email:

Royal Malaysia Police

If you suspect that a child is being harmed, reporting your suspicions may protect the child and obtain help for the family. Please call 15999 with the following information:

- Address or location where the child is being abused or neglected

- Type of abuse or facts of the case

- Identity of the abuser or any information related to the abuser

- From this information, the Agency will then redirect us to the correct police division which deals with Child Protection issues in our area.

Malaysian Law:

If you are working with children, learn to recognise the signs and symptoms and take action if you suspect that a child may have been abused.

The Child Act 2001 requires any medical officer or medical practitioner, childcare provider or member of the family to notify his/her concerns, suspicions or beliefs that a child may have been abused or neglected to the appropriate child protection authority in the country. Failure to do so can result in criminal charges.

Do not hesitate to report abuse that happened in the past but was not reported. The abuser may still be active and your action can save a child.

Any concerned person can report suspicions of child abuse. You do not have to prove it. Do not turn a blind eye. It is our social and moral responsibility to get involved.

Please note, that the School will cooperate with Malaysian Law Enforcement on all matters of the law, which may include, but not limited to, the arrest or removal of a pupil from the School premises. The School will support the pupil, to the best of their capacity legally and professionally as possible in these types of extreme situations.

Child Act 2001: A PROTECTIVE ENVIRONMENT FOR CHILDREN

Malaysia enacted the Child Act 2001 [Act 611] to fulfil its obligation under the Convention on the Rights of the Child (CRC). Act 611 repealed the Juvenile Courts Act 1947 [Act 90], the Women and Girls Protection Act 1973 [Act 106] and the Child Protection Act 1991 [Act 468].

Act 611's preamble provides that 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 status. The provisions of Act 611 are based on the four core principles of the CRC that is, non- discrimination, best interest of the child, the right to life, survival and development and respect for the views of the child.

In 2001, the Act also established the National Council for the Protection of Children, which advises the Government on child protection issues while the National Advisory and Consultative Council for Children acts as a national focal point for children's wellbeing and development.

Act 611 also requires the setting up of Child Protection Teams and Child Activity Centres at both state and district levels. Aimed at mobilising community participation in the implementation of preventive and rehabilitative programmes, these initiatives are targeted for children at risk or children vulnerable to all forms of abuse and exploitation.

In terms of administration of juvenile justice, Act 611 provides for a procedure before the Court for Children which is child-friendly taking into account the mental and emotional maturity of a child.

School Referrals

Helper	Description	Number
Police		999

Gleneagles hospital, Penang Island hospital, Penang	Private Hospital	 0
St. John's Ambulance		03-9285-1576
The Befrienders Kuala Lumpur	24 hr crisis line	03-7956-8145

Women's Aid Organisation	Provides free shelter, counselling, and crisis support to women and children who experience abuse.	03-7956-3488
Malaysian Mental Health Association	Offer a variety of services.	
Penang Clinical Psychology Services	Assessment and diagnosis of mental health problems	0173125975
One Stop Crisis Centre	Medical services at the OSCC are free for survivors of domestic violence and sexual violence.	Government hospitals
Department of Social Welfare		603-2697-1090
The Mind Faculty	A private mental health clinic providing a broad range of services.	03-6203-0359
Oasis Place	Private clinic offering psychologists, therapy (speech, language, music), and assessment of special educational needs	03-2276-9111
Lighthouse Psychological Wellbeing Centre	A private mental health clinic providing a range of services	03-7880-2255

Related Documents

- Academic and Non-Academic Handbook
- Equal Opportunities Policy
- First Aid Policy
- Health and Safety Policy
- 1:1 Tablet and Laptop Programme Agreement
- PSHE and Personal Development Policy

- Behaviour Management Policies
- SEND Policy
- Parent and Community Code of Conduct
- Staff Code of Conduct
- Pupil Code of Conduct
- Pupil Bullying and Harassment Policy
- Risk Assessment Form
- Staff Wellbeing Policy
- Restorative Practices Approach
- Pastoral Care Framework
- Pupil Incident Report

APPENDIX 1: RECORD OF CHILD PROTECTION CONCERN

- This form is to only be completed if CPOMScannot be accessed or by external agencies.
- To be completed by the reporting person.
- Attach any other notes and statements to this form.

Designated Safeguard Leads will be kept in the pupil case file.

Please submit this completed form directly to the Designated Safeguarding Lead. If unavailable please submit to the Deputy Principal, or Principal of the school.

If all above are unavailable, place the completed form in a sealed envelope addressed:

'URGENT: DESIGNATED SAFEGUARDING LEAD' and give it to the office staff.

You will receive a response, acknowledging the receipt of your statement. Please note under Safeguarding regulations, you will not receive updates of the case.

Thank you for your vigilance.

APPENDIX 2: Record of Child Protection

To be completed by the DSL with any other attached notes for reference.
DSL to file in alphabetical order (surname) under 2 locks.

Child's Name:		Tutor Group	
Date and Time of Concern:			
Concern Initially Reported By:			

Concern logged on CPOMS: YES/NO (delete as appropriate)

Name of Pupil	
Tutor Group	
Member of staff reporting	
Date and time	
Location	
Details/Observations/Incident	

Additional Information:
Context of concern / disclosure /
Details of any physical and emotional
Signs / witness

Indication of any markings on body outline:			
Action Resulting: What did you do / say following the concern, and what you chose not to do?			
Action:	When:	By Whom?	
Details to be placed on the School's 'At Risk Register (YES / NO)			
Your name:			
Your signature:		Date:	
Your position in the School			

APPENDIX 3: Child Protection and Safeguarding Policy Acceptance Form

Full Name:

Passport/ID Number:

Date:

Position at the School:

- I have read and accepted the Stonyhurst International School Penang's Child Protection and Safeguarding Policy.

- I have read and accepted the Intimate Care Policy in conjunction with the Stonyhurst International School Penang's Child Protection and Safeguarding Policy.

- I understand that my acceptance of this means that;

  1. I have read and understood the documents. I have had the opportunity to review the documents and ask questions and/or seek clarification.
  2. A copy of the documents are readily available should I need to refer to them.
  3. I am bound to act within the guidelines detailed in the documents.
  4. Any breach of the code and/or policy must be reported immediately following the process outlined in the relevant documents.
  5. Any breach of code and/or policy may result in disciplinary and/or legal action.

- I will ensure the School's HR department receives a copy of this signed Appendix 3 by the required date.

Signed: _____

APPENDIX 4

Types of Abuse
Abuse Further Defined – Abuse Myths And Realities

The following section aims to provide more detailed information regarding behavioural indicators of abuse in relation to the different types of abuse. It should be noted that children respond to abuse in different ways so the guidance should not be seen as exhaustive or behaviours belonging exclusively to one form of abuse.

Note: Behavioural indicators in themselves do not constitute abuse or neglect. There can for example be several explanations why a child is avoiding class which are not abuse related. Being aware of indicators along with other

factors can contribute significantly toward understanding a child's distress and ultimately safeguarding the child.

Staff observation and reporting helps the Head of Pastoral and Safeguarding School Committee 'see the bigger picture' which helps identify patterns which indicate the potential frequency and seriousness of abuse. This information also helps inform our responses aimed at protecting children.

Categories of Child Abuse and their Signs/Symptoms

There are four main areas of Child Abuse. It should be recognised that the following suggested signs of abuse may also be a symptom of another problem.

Neglect: Failure to provide for a child's basic needs within their environment ie food, shelter, warmth, clothing, age appropriate supervision.

Physical neglect: (e.g., failure to provide necessary food, warmth, clothing or shelter) Lack of appropriate supervision, failure to provide proper adult guardianship such as leaving young children unsupervised at home for any extended period of time.

Medical Neglect: Failure to provide necessary medical or mental health treatment, neglecting to follow through with prescribed courses of medication.

Emotional Neglect: Inattention to a child's emotional needs, failure to provide psychological care (attention, appropriate hugs, physical contact, etc.), or permitting the child to use alcohol or other drugs.

Indicators of Neglect

- Child is unwashed or hungry
- Child's clothes are too small, not fit for purpose
- Poor personal hygiene
- Over filling plates when eating
- Stealing others property
- Tired looking, physically small, 'Organic or non-organic failure to thrive'
- Parents / carers are uninterested in child's academic performance
- Low energy and motivation
- Parents / carers do not respond to repeated communications from the school
- Child does not want to go home
- Parents / carers cannot be reached in the case of emergency
- Little future ambition (focussing on daily survival)

- Children coming ill prepared for school
- Children left at home for long periods of time (time varies depending upon age)
- Parents failing to notify school of their absences.

Emotional Abuse - Further Defined:

- Treating a child / person in a way which deliberately undermines their confidence, self-esteem, and self- worth. Stigmatising, discriminating or humiliating a child based on their age, gender, sexual orientation, race, language, physicality, intellect.
- Name calling, humiliation, sarcasm directed at the child
- Parents or teachers swing between being overprotective and over punitive (inconsistent caregiving, teaching approaches)
- Parental interference in school life (as opposed to supporting school life)
- Humiliation by adult in front of other children
- Overly negative attitude toward child from parents, staff or carers – only noticing the child's deficits and unable to notice positive aspects of the child.
- Threatening love or care withdrawal as a punishment
- Using put downs, threats or other verbal or written means to undermine the person's emotional security and psychological well being
- Verbal abuse, harassment, menaces, threats and humiliation. Refusing to acknowledge the presence of a child – deliberate ignoring
- Invasion of privacy or personal space for no specific reason (menace, annoyance)
- Witnessing of domestic violence between parents or carers
- Overworking a child
- Emotional bullying.

Indicators of Psychological / Emotional Abuse

- Child is quiet or withdrawn
- Socially isolated avoids interactions with the community
- Child appears depressed

- Loss of appetite
- Sudden loss of motivation for school or activities
- Mood swings
- Changes in behaviour
- Angry outbursts
- Tearful
- Avoids eye contact
- Unwillingness to try new things
- Avoidance of people, places, situations
- Sleep problems
- Signs of anxiety
- Obsessions or phobias
- Attention needing behaviours
- Tiredness
- Seeking inappropriate relationships

Physical Abuse - Further Defined:

- Inflicting physical injury on a child by other than accidental means, causing skin bruising, burns, disfigurement, impairment of physical or emotional health, or loss or impairment of any bodily function, death.
- Creating a substantial risk of physical harm to a child's bodily functioning.
- Committing acts that are cruel or inhumane regardless of observable injury. Such acts may include, but are not limited to, instances of extreme discipline demonstrating a disregard of a child's pain and/or mental suffering.
- Assaulting or criminally mistreating a child as defined by either the criminal code or school policy.
- Exposing the child to toxic, injurious or corrosive substances.
- Engaging in actions or omissions resulting in injury to, or creating a substantial risk to the physical or mental health or development of a child
- Failing to take reasonable steps to prevent the occurrence of any of the above.

- Assault or injuries sustained during involvement in domestic violence between parents or carers.
- Physical bullying.

Indicators of Physical Abuse

- Unexplained bruises and welts on any part of the body
- Bruises of different ages (various colours)
- Injuries reflecting shape of article used (electric cord, belt, buckle, ping pong paddle, hand)
- Injuries that regularly appear after absence or vacation
- Unexplained burns, especially to soles, palms, back, or buttocks
- Burns with a pattern from an electric burner, iron, or cigarette
- Rope burns on arms, legs, neck, or torso
- Injuries inconsistent with information offered by the child
- Immersion burns with a distinct boundary line
- Unexplained laceration, abrasions, or fractures
- Bruising around the neck and throat
- Finger-tip bruising
- Injuries sustained after an absence from school
- Broken bones, bruises in unusual places, twist injuries (younger children)

Please note some physical disciplining of children is used in Malaysia. 'Malaysia has signed the UN Convention of the Rights of the Child which protects children from all forms of physical or mental violence.' Parents are likely to be charged with child abuse if the child is significantly injured as a result of excessive force. **At Stonyhurst International School the physical disciplining of pupils is never acceptable.**

Sexual Abuse Further Defined

- Committing or allowing to be committed any sexual offence against a child as defined in either the criminal code of the host country or school policy.
- Intentionally touching either directly or through clothing, the genitals, anus, or breasts of a child for other than hygiene, medical or child care purposes.

- Sexual acts that are reasonably considered beyond the age, physical development or understanding of the child. Sexual acts perpetrated by a person in a position of trust regardless of consent.

- Sexual acts perpetrated against another in the manner of bullying. A person being intimidated into performing a sexual act.

- Sexual harassment.

- UPSKIRTING upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

Indicators of Sexual Abuse

- Sexual behaviour or use of language not appropriate to age level

- Unusual interpersonal relationship patterns (e.g. too close physically or emotionally)

- Sexually Transmitted Disease/Infection in a child of any age

- Evidence of physical trauma or bleeding to the oral, genital, or anal areas

- Difficulty in walking or sitting

- Refusing to change into PE clothes, fear of bathrooms

- Child running away from home, school, dorm and not giving any specific complaint

- Not wanting to be alone with an individual

- Pregnancy

- Extremely protective parenting

- Refusing to eat certain foods or eat in front of people

- Promiscuity or touch aversion

- Sexual touching from child / different sexual boundaries

- Adults feel sexually uncomfortable with child's behaviour or language

- Personal hygiene issues

- Dressing down

- Socially guarded, withdrawn, self-protecting

- Not wanting to be alone

- Non age appropriate sexual knowledge or behaviour
- Sexual play or language
- Abrupt behaviour changes.

Signs and Symptoms of Female Genital Mutilation (FGC)

Female genital cutting refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons (Safeguarding and Child Protection Policy Amended November 2018-19). FGC typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8. In Malaysia, the practice of female genital cutting (FGC) is called 'khitan'.

Risk factors for FGC include:

- Mother or a sister who has undergone FGC
- Girls who are withdrawn from PSHE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman

Symptoms of FGC:

FGC may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents who wish to withdraw their children from learning about FGC.

Indications that FGC may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- Frequent urinary, menstrual or stomach problems
- Prolonged or repeated absences from school, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- Reluctance to undergo normal medical examinations
- Confiding in a professional without being explicit about the problem due to embarrassment or fear
- Talking about pain or discomfort between her legs

*At time of writing, this practice was still legal in Malaysia, with a 2009 fatwa (edict) issued making it mandatory for

Muslim girls. The School takes the position that when FGM is disclosed or suspected, it must be reported to the DSL as it can impact the child's health and wellbeing.

Grooming Behaviours in Abusers

In the event of physical abuse, emotional abuse or neglect the abuse is often perpetrated as part of a bullying or neglectful organisation or family culture. Physical abuse in particular is usually triggered by anger, frustration or other high expressed emotion. Typically the event is not premeditated or planned. Sexual abuse is different.

Whilst sexual abuse can be opportunistic, it most commonly requires planning and intent. The process of preparing a child for sexual exploitation is called grooming. Grooming behaviours function to elicit trust from the child whilst creating a climate within the organisation which reduces the abusers chances of detection or being reported. Grooming behaviours also often create a climate which makes it harder for the victim to report when they want the abuse to stop (either through guilt, shame, threats, menaces, blackmail, loss of relationship etc.) Sexual abuse requires far more secrecy than other forms of child abuse, so is often more difficult to notice and report for colleagues and victims.

Where there are situations of sexual abuse between children, similar behaviours and patterns can be found. Abuse is more likely to occur during unstructured and unsupervised periods and areas, such as bathrooms, toilets, bed rooms, bedtimes, play times, during times and in areas when staff are distracted or busy, during staffs meetings, when all or the majority of staff/adults are unavailable.

Grooming of Organisations

In sexual abuse cases the behaviour of the abuser tends to be more secretive and insidious in nature. Typically, an abuser will 'groom' the child(ren) and the organisation over a period of time. Often when pedophilia or abuse is exposed it is often a member of staff who has been considered beyond reproach which makes it harder for colleagues and victims to report.

The grooming of organisations often involves the abuser in fostering personal friendships with key people. This strategy serves as a self-protection mechanism for the abuser, making it harder for people to raise concerns. Grooming behaviours with children often involves the adult developing a 'special' relationship with a child. This relationship gradually changes in nature as the adult elicits trust or fear in the child which prevents them from telling. Sometimes the nature of the attention is enjoyed by the child creating confusion around intimacy and boundaries.

Warning Signs

- Staff members spending more time with one particular child
- Spending excessive time with a particular child
- Staff who have developed a 'special' relationship with one particular child
- Secretive behaviours e.g. walks, meetings, out of hours, private classrooms / offices etc
- Staff who buy gifts for a particular child to the exclusion of others
- Inviting children to staff homes / spending the night (unauthorised or regularly)

- Mildly convincing reasons for inviting children to staff home e.g. help with tuition
- Child's demeanour changes in the presence of a particular adult
- A child receiving different treatment to other children
- Intimate touch or body language
- Intimate words used by adult or child toward each other or in conversation with others
- Children bragging about or name calling about a particular adult
- Leaving notes or drawing for others to see (attempts at whistleblowing).

Note: In an International School it is normal to invite children and their peers to staff homes for play dates, social time, sleep overs etc. with their own children. This is different to inviting children to the houses of single staff or couples who do not have children of the child's age.

In terms of staff protection if a circumstance arises where a child is visiting your home in circumstances that could appear odd to an objective outside observer – seek authorisation and permission first.

Myths and Realities of Child Abuse (Source: Save The Children)
Myth: Child abuse is carried out by strangers.

Fact: Research indicates that 90% of abuse is from domestic causes and is committed by individuals known to the child. E.g. parents, baby sitters, teachers, family friends, carers.

Myth: Learning about child protection is harmful to your children.

Fact: Research indicates that developmentally appropriate education makes children more confident and able to respond better to dangerous situations.

Myth: Abuse/ Self Protection education is sex education.

Fact: It is more about learning personal safety which prepares pupils to develop skills and attitudes to keep themselves safe from bullying, harassment and other forms of exploitation.

Myth: Abuse is a matter of culture; physical or sexual abuse falls within the norms of some cultures and is acceptable.

Fact: The reality is that there no excuse for child abuse! No culture supports harming children.

Myth: Child abuse is a result of poverty and happens in low socio-economic circumstances.

Fact: Research indicates that child abuse occurs in all racial, ethnic, socio-economic, and cultural sectors of society.

Myth: Children do not sexually abuse other children

Fact: Abuse happens between children. The likelihood is increased in emotionally impoverished environments where children are more likely to resort to self-soothing (sexual behaviour), sexual intimidation or harassment of others or engage in power dynamics such as the bullying of others. (Low adult to child ratios increase the likelihood of these behaviours occurring due to lack of available nurturing attention and supervision).

Myth: International Schools do not have to report abuse to local authorities.

Fact: International schools are bound by the laws of the host country and as such international schools must be knowledgeable and compliant with the child protection laws in their locale. Furthermore, international schools are legally and ethically liable for any violation of existing laws related to reporting of cases of abuse or neglect; there are cases now pending where schools are facing legal action in regard to non-reporting. International Schools have a responsibility to protect their own children as well as to take measures to prevent future abuses. For this reason if a staff member is found to have abused a child they will be reported to the CIS and possibly their consulate to prevent abuse of further children.

Abuse Awareness- Malaysian Context

Malaysia has in recent years taken significant steps to modernise their National Child Protection agenda. Significantly in 1994 Malaysia signed up to the UN Convention for the Rights of the Child. The intention to strengthen its child protection infrastructure was brought another step forward with Laws of Malaysia Act 611 Children Act 2001. The act consolidated and amended the laws relating to care and protection of children. As a result Child Protection teams have been established nationally and regionally. Each Region has a 'Protector' appointed to advise and report to over child protection concerns.

SAFEGUARDING ESCALATION STANDARD OPERATING PROCEDURE (SOP)

Safeguarding Appendix 5

Stonyhurst Penang

Safeguarding Concern, Escalation, File Management & Record-Keeping Framework

1. Purpose of This SOP

This Standard Operating Procedure establishes the process for logging, monitoring, escalating, recording, storing, and reporting safeguarding concerns.

It ensures:

- Child welfare is prioritised
- Decisions are consistent, proportionate, and compliant
- Documentation is clear and auditable
- No duplication of work occurs
- Secure and accessible long-term safeguarding records
- Clear roles and responsibilities across safeguarding and pastoral teams
- Governance reporting is anonymised and appropriate

2. Core Principles

2.1 Child's Best Interests First

Every decision must prioritise the safety, wellbeing, and rights of the child.

2.2 Proportionate Response

Concerns are addressed through graduated support, ensuring early help while escalating appropriately where risk increases.

2.3 Timeliness & No Drift

All concerns must be reviewed promptly. Safeguarding concerns must be escalated without delay.

2.4 Clear Accountability & Audit Trail

All actions, decisions, and reviews must be documented in CPOMSwith dates, names, and rationale.

2.5 Consistency of Threshold

DSLs apply agreed indicators and professional judgement consistently.

2.6 Transparency Without Duplication

CPOMS is the single source of truth. Physical and digital files store only evidence that cannot be held within CPOMS.

2.7 Annual Oversight & Review

Closed cases are reviewed annually to ensure learning, compliance, and long-term safeguarding continuity.

3. Escalation Framework

Safeguarding concerns are categorised into three levels.

TIER 0 – Pastoral / Monitoring (CPOMs only)

Examples

- Minor behaviour issues
- Friendship fallouts that resolve quickly
- Low-level wellbeing concerns
- Early emotional changes
- Accidental harm or silly behaviour with no intent

Responsibility

Tutor / Form Teacher / Pastoral Lead

Actions

- Record concern in CPOMS
- Provide early intervention
- Set review date
- No safeguarding register entry
- No physical or digital file

TIER 1 – Pastoral Plus / Early Help (CPOMS only, DSL oversight)

Tier 1 concerns require DSL awareness and monitoring but do not yet meet safeguarding threshold.

Examples of Tier 1 Concerns

1. Social / Behavioural

- Friendship conflict
- Reciprocal unkindness or teasing
- Hurtful comments
- Behaviour described as "bullying" but assessed as conflict or one-off harm

2. Emerging Wellbeing

- Increased anxiety
- Withdrawal or isolation
- Low-level emotional dysregulation
- Non-crisis self-harm comments (no plan or intent)

3. Moderate Behaviour

- Escalating dysregulation
- Repeated pastoral concerns across subjects

4. Early Family Stress

- Bereavement
- Illness
- Family separation or conflict

5. Mutual Physical Fights (age-considered)

- EYFS–Y3: rough play or impulsive behaviour → Tier 1
- Y4–Y6: mutual conflict without injury → Tier 1
- Y7–Y13: Tier 1 only if one-off, no injury, no power imbalance

    - Otherwise escalate to Tier 2

6. Sexualised Behaviours (developmentally contextualised)

- Curiosity-based behaviour
- Inappropriate language without targeting
- Accidental exposure to online sexual content
- Searching for sexual material without evidence of coercion, exploitation, or distress

7. Mental health

- Anxiety, low mood, or stress does not significantly impair daily functioning
- The pupil:
    - Attends school
    - Engages in learning
    - Maintains relationships
- Low-level emotional distress
- Low-level or passive statements (e.g. “I feel overwhelmed”, “I wish I could disappear”)
- No plan, intent, or means
- No immediate safety risk
- Coping strategies are effective
- Protective factors are present (supportive peers, family engagement)

Tier 1 Responsibilities

- Pastoral Team implements support
- DSL reviews within 24–48 hours
- Actions set and reviewed in iSAMS

Tier 1 Actions

All actions must be:

- Logged in CPOMS
- Categorised using school protocol categories

Actions may include:

- Check-ins
- Restorative conversations
- Mediation
- Parent communication
- Counselling referral
- Monitoring plans

Tier 1 Review

- Review dates set in CPOMS
- Reviewed weekly or fortnightly
- DSL decides to close, continue, or escalate

TIER 2 – Safeguarding / Protection Case

(CPOMS + Safeguarding Register + evidence files when required)

A concern becomes Tier 2 when there is risk of significant harm.

Examples / Red Flags

- Disclosure of abuse
- Serious injury
- Significant neglect
- Harmful sexual behaviour or sexual harassment
- Repeated or compulsive pornography access causing distress or risk
- Online exploitation or grooming

- Self-harm with plan or intent
- Domestic violence impacting the child
- Radicalisation
- Serious or targeted bullying
- Suicidal ideation **with intent, plan, or means**
- Escalating frequency or severity of self-harm
- Expressions of wanting to die
- Significant withdrawal from daily life
- School refusal linked to mental health
- Eating disorder behaviours causing medical risk
- Psychosis or loss of reality testing
- Substance misuse linked to mental health
- Lack of protective factors
- Parental inability to keep child safe
- Any situation where **immediate safety planning is required**

Responsibilities

- Only the DSL or Deputy DSL may decide that a concern is escalated to Tier 2
- DSL assigns case status and roles
- Safeguarding Committee provides oversight

Actions at Tier 2

- Record safeguarding decision in CPOMS
- Add pupil to the Safeguarding Register
- Assign a Case Worker for Open cases only
- Assign a Pastoral Support Lead where appropriate

- Create physical/digital files only if needed
- Make external referrals as required
- Where appropriate, complete an individual safeguarding risk assessment and determine whether temporary adjustments to the pupil's attendance or educational provision are necessary pending medical or specialist advice
- Review regularly and re-classify as Open, Ongoing, or Closed

4. Case Roles & Responsibilities (New Section – Recommended)

Case Worker

- Required for Open safeguarding cases only
- Must be a DSL or Deputy DSL
- Must be Level 3 safeguarding trained
- Must be a member of the Safeguarding Committee
- Responsible for safeguarding decisions, escalation, referrals, and closure

Pastoral Support Lead

- May be Tutor, Head of Year, or Pastoral Leader
- Provides day-to-day monitoring and pupil support
- Acts under DSL direction
- May be assigned to Open and Ongoing cases

Ongoing Cases

- No named Case Worker required
- Oversight held by DSL team
- Pastoral support continues

Closed Cases

- No named Case Worker or Pastoral Lead

- Tutors raise concerns if new issues emerge

5. File Management Framework (No Duplication)

The school operates a clear, proportionate, and non-duplicative approach to safeguarding records.
CPOMS remains the primary and authoritative safeguarding record at all times.

Additional files (physical or digital) are created only where necessary to store evidence that cannot be appropriately or securely held within CPOMS.

5.1 CPOMS – Primary Safeguarding Record (Required)

CPOMS is the single source of truth for safeguarding and must contain:

- All concerns and disclosures
- Chronology of actions and decisions
- DSL risk assessments and professional judgement
- Assigned actions and reviews
- Case status (Open / Ongoing / Closed)
- Cross-references to any supporting physical or digital evidence
- Safeguarding register flag (where applicable)

All safeguarding decisions, reviews, and rationale must be logged in CPOMS, regardless of whether additional files exist.

5.2 Physical Safeguarding File (Optional – Evidence Only)

A physical safeguarding file is created only where physical documentation exists, such as:

- Handwritten disclosure notes
- Pupil drawings or written work relating to a concern
- Signed documents
- Printed material required by external agencies
- Physical evidence that cannot be stored digitally

The physical file:

- May be empty if no physical evidence exists

- Is stored in a locked filing cabinet within a locked room
- Is referenced in CPOMS (e.g. "Original handwritten note stored in physical safeguarding file")

The physical file does not duplicate CPOMS records.

5.3 Digital Safeguarding File (Optional – Evidence Only)

A digital safeguarding file is created only when evidence cannot be uploaded to CPOMS, such as:

- Video or audio files
- Screenshots
- Social media or online content
- Large email chains
- Images
- Multi-agency documents
- Serious incident justification or decision-making records (where required)

Digital safeguarding files are stored in a **restricted Google Shared Drive** that:

- Is accessible **only to the six members of the Safeguarding Committee**
- Is owned by the school domain (not individual staff)
- Uses standardised folder naming
- Ensures continuity if DSL personnel change

Where a digital file exists, this is clearly noted in CPOMS (e.g.
"Supporting digital evidence stored in Safeguarding Shared Drive – Folder [Case ID].")

5.4 Safeguarding Register Storage

The Tier 2 Safeguarding Register is maintained within the school's secure safeguarding record system. During the implementation of CPOMS, the method of maintaining this register may be adapted by the Safeguarding Committee, provided that appropriate oversight, audit trails and secure access are maintained.

- Access is limited to the Safeguarding Committee only

- The register provides oversight and tracking, not detailed case records
- It supports monitoring, annual review, and anonymised reporting to the Board

5.5 Principle of No Duplication

- CPOMS holds the narrative and decision-making record
- Physical and digital files hold supporting evidence only
- Evidence is referenced, not copied
- No work should be duplicated across systems

This ensures safeguarding records are:

- Secure
- Accessible to authorised staff
- Inspectable
- Proportionate
- Sustainable over time

6. Safeguarding Register (Spreadsheet)

The Tier 2 Safeguarding Register (or equivalent safeguarding oversight system) records::

- Safeguarding type
- Case status
- Case Worker (Open only)
- Pastoral Support Lead (Open & Ongoing)
- Key dates
- External agency involvement
- Annual review outcome
- BOG reporting indicator

The Tier 2 safeguarding oversight system is used to monitor and track safeguarding cases. Whether maintained as a register or through CPOMS functionality, it is not intended to replace the detailed case record..

7. DSL & Deputy DSL Oversight (Strengthened)

The DSL and Deputy DSL are responsible for:

- Monitoring all cases via the register
- Reviewing trends and risk
- Providing feedback to the Safeguarding Committee
- Determining next steps and resourcing
- Preparing anonymised reports for the Board of Governors

8. Board of Governors (BOG) Reporting

Unchanged, but explicitly based on register tracking and DSL analysis.

9. Annual Review, Archiving & Retention

Safeguarding records are retained until age 25, or longer if legally required.

When a pupil leaves:

- Case marked as Left School
- Files moved to archive section of Safeguarding Drive
- Physical file placed in archive cabinet
- Record remains accessible to future DSLs

9. Summary Flow (Staff View)

Tier 0 → CPOMS only → Pastoral Monitoring

Tier 1 →CPOMS only → DSL-Aware Early Help

Tier 2 → CPOMS + Register + Evidence Files (only when needed)