



Policy	Safeguarding Policy			
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Scope	Whole Group	<input type="checkbox"/>	Whole School	<input checked="" type="checkbox"/>
	International Primary	<input type="checkbox"/>	National Primary	<input type="checkbox"/>
	International Secondary	<input type="checkbox"/>	National Secondary	<input type="checkbox"/>
Ownership:	Campus Principal		Approved by:	SLT



Introduction

The intended purpose of this policy that it be linked to Tenby School's Guiding Statements.

Our Vision

We exist to grow the world's most curious, confident minds.

Our Mission

Tenby Schools Penang is on a journey to deliver a transformative education to our families and students that will spark their curiosity and grow their self-confidence, knowledge and life skills that will help them thrive now and throughout their lifetime.

Values

Our STEAM Six are the very compass that guides every action, every lesson and every interaction within our community. These values empower our learners to not just acquire knowledge, but to fuel their curiosity, building confidence, and equip themselves for any challenge that life throws their way:

- The courage to EXPLORE
- The energy to INNOVATE
- The mindset to GROW
- The resilience to PERSEVERE
- The compassion to LEAD
- The skills to SUCCEED

Life Competencies

Students are encouraged to develop five key life competencies during their journey in our school. They should be able to demonstrate how they have developed these competencies and should understand how these competencies will support them to be successful in our school, and in the future.

- Character
- Critical Thinking
- Creativity
- Communication
- Collaboration

Safeguarding Policy

This policy has been developed in accordance with the ISP Safeguarding Policy Application Notes (PAN.HS.001.001.20171119. SAFEGUARDING



Rationale

At Tenby Schools Penang, we are committed to safeguarding and promoting the welfare of children and young people and we expect that all staff and volunteers in our schools and any contractors or partner agency staff used by schools, recognise where a student is at risk of, or is actually being harmed and do all they can to reduce further risk or harm.

We recognise that our staff and volunteers are particularly important in protecting our students; they are in the best position to identify concerns early and provide or identify help for students as well as helping to prevent these concerns from escalating.

Tenby Schools Penang adheres to these basic principles:

- A child's welfare is paramount, and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender, or culture.
- All students need to be safe and feel safe in school.
- Every student is entitled to a rich and broad curriculum that helps to equip them to keep themselves safe.
- Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
- We work in partnership with parents/carers and/or other professionals to ensure the protection of students.
- Our guiding principle throughout is 'the best interests of the students'.
- All students have the same equal rights to protection, but we recognise that we need to do more for some students because of their special educational needs, disability, gender, religion, or sexual orientation.

Policy Aims and Objectives

We will:

- Provide a safe and happy environment to enable students to thrive and learn.
- Outline the systems and processes we will take to ensure that students remain safe at school.
- Raise awareness to all employees of safeguarding / child protection issues and define their roles and responsibilities in reporting cases of abuse.
- Identify students who are suffering, or likely to suffer harm.
- Ensure effective communication between all employees on child protection / safeguarding issues.
- Set effective procedures for employees / volunteers or third-party individuals who encounter any issues in relation to child protection / safeguarding to follow.
- Be clear with all parties, including students and their parents / carers, regarding our approach to safeguarding and child protection, through the provision of clear and well communicated policies.



DEFINITIONS

1. Safeguarding

Safeguarding and promoting the welfare of children refers to the processes of protecting students from harm, preventing the impairment of their health and development, ensuring that we seek to improve the general health and well-being of all students in our care and enabling every student to have the optimum life chances and enter adulthood successfully.

2. Child Protection

Child Protection is the core element of safeguarding and is defined as the responsibility to protect children who are suffering or likely to suffer from harm as a result of abuse or neglect.

PRINCIPLES

Given our international context Tenby Schools Penang recognises and accepts its responsibility to safeguard all students under the UN Convention on the Rights of the Child (1989). Tenby Schools Penang recognises the obligation to protect our students from harm and in particular, the obligation on our school under the following Articles of the UN convention:


- Article 3: which states that the best interests of children must be the primary concern in decision making about them.
- Article 13: which states that children have the right to get and share information as long as it is not damaging to them or another child.
- Article 14: which states that children have the right to think and believe what they want and to practice their religion.
- Article 19: which states children have the right to be protected from hurt and mistreatment, physically and mentally.
- Article 34: which states that Governments should protect children from sexual exploitation and abuse.
- Article 35: which states that Governments should take all measures to ensure that children are not abducted, sold or trafficked.
- Article 36: which states that children should be protected from any activity that takes advantage of them or could harm their welfare and development.
- Article 37: which states that no one is allowed to punish children in a cruel or harmful way.

RESPONSIBILITIES

1. Principal and Senior Management Team of the Schools

The Principals and Senior Management Team will:

- Ensure that the culture of the school facilitates concerns being raised and handled sensitively.
- Ensure that safeguarding is addressed through the curriculum. ensuring that children throughout the school are taught about keeping themselves safe, including online safety.
- Ensure the school site is secure.
- Ensure that local mapping of legislation, guidance and supportive agencies is undertaken and added to the school's policy.
- Only deploy staff who will have unsupervised contact with children, where safe recruitment procedures have been followed.
- Maintain a record of all training undertaken by staff in relation to safeguarding and child protection. This training record should be made available for inspection



during any audit and should reflect the timescales for renewal identified in this policy.

2. Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) at Tenby Schools Penang is David Jameson who can be contacted on 04 892 7777 or pen.safeguarding@tenby.edu.my. This designated staff role is guided by two principles:

- The welfare of the child is always paramount.
- Confidentiality should be respected as far as is reasonably possible.

Being guided by these principles the Designated Safeguarding Lead will:


- Play a key role in ensuring that the school takes action to support any student who may be at risk.
- With the Principal, make sure that all staff, both teaching and non-teaching, are aware of their responsibilities in relation to safeguarding and child protection.
- Have appropriate training in addition to the basic training that all other staff receive. This includes attending ISP Designated Safeguarding Lead training at least every two years and actively participating in their DSL Regional Networking meetings to ensure they stay updated on safeguarding issues.
- Collate and keep accurate and confidential records of any concerns about children.
- Collate and keep accurate and confidential records of any concerns about children, this should include ensuring robust action plans are implemented at the earliest opportunity which are captured in writing and are reviewed regularly.
- Have a clear understanding of the local expectations around safeguarding, who to contact, what agencies exist and how to contact them.
- Ensure that the entire school community knows who the DSL/ DSL Team is in their setting.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.

All staff have the responsibility to report to the Designated Safeguarding Lead any concern they have about the safety of any child in their care. The Designated Safeguarding Lead's responsibility is to make decisions about what to do next and then to take appropriate action.

3. All staff (including partner organisations and contractors having unsupervised contact with children)

All staff will:

- Ensure they are familiar with and follow the Safeguarding Policy and all other safeguarding related documents
- Be subject to safe recruitment processes and checks prior to starting at the school/organisation (unless an action plan/risk assessment is in place to ensure the staff member is supervised until all checks are completed), this **must** be authorised by the Group Director of Health and Safety before employment begins).
- Be alert to signs and indicators of possible abuse.
- Listen to and take seriously the views and concerns of children. Listen to and



take seriously the views and concerns of children, knowing what to do if a child tells them he/she is being abused, exploited, or neglected.

- Know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Designated Safeguarding Lead (or a deputy) and children's social care in their area. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- Be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse. Nor should a victim ever be made to feel ashamed for making a report.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL) on the school's concern form.
- Be aware of who the Designated Safeguarding Leader is in the school they are working in. In Tenby Schools Penang the Designated Safeguarding Lead(s) is David Jameson and they can be contacted on 04 892 7777 or pen.safeguarding@tenby.edu.my
- Follow the procedures outlined in this document when/if concerned about any child.
- Support students, staff or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.
- Undertake appropriate child protection/safeguarding and safe recruitment training (and refresher training as required by ISP).
- All staff and volunteers need to recognise that if their behaviour inside or outside the workplace breaches the Tenby code of conduct and/or the guidance for safe working practice, this may be considered a disciplinary or even criminal matter.

All staff who have occasional or supervised contact with children (including staff from partner and contracted organisations) will:

- Undergo a safeguarding briefing/induction in relation to their role, understand what is required of them if they have concerns and to whom they should report.
- Provide written confirmation to demonstrate that where appropriate, all partner agency staff/contractors have been safely recruited with appropriate checks undertaken and that a safeguarding briefing has been provided to these staff, (appropriate to the role and contact they will have with children) before they commence their role in any ISP school. Where these staff or volunteers are constantly supervised, the recruitment checks may not need to be as rigorous, but it is for the Principal/ Designated Safeguarding Lead to assess this risk, not individual members of staff or partner organisations themselves.
- Where partners/contractors do not have their own safeguarding or child protection policy, the Tenby Schools Penang safeguarding policy will be used and partners/contractors asked to read and follow this. These requirements will be part of any contractual arrangement.
- Follow the guidance laid down in this document at all times. Be provided with guidance on appropriate safe working practice.



TRAINING AND SUPPORT

Tenby Schools Penang will ensure that:

- All staff, volunteers and partner agencies in schools are provided with appropriate general safeguarding training on joining the organisation. then undertake annual refreshers. This training will be available through ISP authorised online courses e.g., Safeguarding Essentials on the Learning Hub or in-house training (following the ISP format within the DSL resources), whichever is appropriate, as well as face-to-face events.
- All staff receive safeguarding and child protection (including online safety) updates throughout the school year (for example, via email and e-bulletins) to provide them with relevant skills and knowledge to safeguard students effectively.
- Relevant documents are made available in a range of relevant languages.
- Staff and volunteers are supported and have the necessary skills to recognise and take appropriate action regarding students who are at risk, or potentially at risk.
- Those who have the Designated Safeguarding Lead responsibility in schools have appropriate, up to date knowledge and that they access appropriate additional and specialist training (approved by the Group H&S Director). This will be refreshed every two years.
- All staff and volunteers are subject to a full induction, which includes an overview of what to do and who to contact if concerned about a student.
- Appropriate staff are trained in safe recruitment. This safe recruitment training must be renewed every five years.
- Training for new starters must be complete before any new starter can have unsupervised contact with students.
- Any student who has or is suffering from any form of harm will receive support. Once agreed with any investigating agency (if involved), students can be offered direct support through school counsellors or external agency input. Tenby schools Penang will hold information in relation to local, regional, or national bodies that may be able to offer direct support in these circumstances.

Tenby Schools Penang recognise our duty of care to our employees and where staff have been involved in reporting and responding to abuse, we recognise that this can be very difficult to deal with in isolation. Tenby Schools Penang will therefore be able to offer or broker appropriate external support or counselling for any staff member affected by a safeguarding issue. Tenby Schools Penang will keep a list of organisations (such as law firms, hospitals, and counsellors) which can be made available to staff on request.


Please remember unless you are specifically asked to do so, never carry out an investigation about any suspected abuse. This can be highly specialist work and could interfere with a criminal investigation if this were required and appropriate under local laws.

FORMS OF ABUSE

There are a significant number of ways that students may be exposed to risk and danger. All require a response. Abuse is defined as any form of maltreatment of a child. This can manifest itself as direct harm to a child, or by a failure to take action to protect a child who is at risk of, or already suffering harm.

The more commonly referred to types of abuse are:

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding or otherwise causing harm to a child.
- **Emotional abuse:** the persistent maltreatment of a child such as to cause severe



and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved or valued only in so far as they meet the needs of another person.

- **Sexual Abuse:** involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This form of abuse can involve direct contact activities but also non-contact activities over social media or the internet.
- **Neglect:** This is the persistent failure to meet a child's basic physical or psychological needs likely to result in the serious impairment of the child's health or development.

While the above are the broad four main areas of potential abuse, abuse itself can take many forms involving one or more of these areas. Organisational and school staff need to be aware of what to look for and what actions to take when concerned about any of these issues (or any other concerns).

SPECIFIC SAFEGUARDING ISSUES

There are specific safeguarding issues that can put children at risk of harm (listed below), all areas will be covered in ISP initial training courses and must be included in annual refresher training or during a safeguarding training programme delivered throughout the school year. This helps to ensure all staff are aware of the signs and indicators of these specific issues to enable early intervention support to be put in place within schools or referrals made to specialist outside agencies.

1. Peer on peer abuse

ISP recognises that children are capable of abusing their peers. Where an allegation is made that one child may have abused another, this will always be taken seriously and dealt with as a safeguarding matter. This type of peer-on-peer behaviour will not be tolerated. It can happen both inside and outside of school and online. Peer on Peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- non-consensual sharing of nudes and semi nudes images and/or videos (sexting);
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- 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; and
- initiation/hazing type violence and rituals, this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

2. Sexual violence and sexual harassment

This can occur between two children of any age and sex, from primary through to secondary



stage. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All staff must maintain an attitude of 'it could happen here'.

Any report of peer-on-peer abuse should be taken seriously it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

All staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

3. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

4. Sexting

Sexting is when someone shares sexual, naked, or semi-naked images or videos of themselves or others or sends sexually explicit messages.

Sexting may also be referred to by students as trading nudes, dirties or pic for pic.

There are many reasons why a student may want to send a naked or semi-naked picture, video, or message to someone else:

- They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent or has groomed the child to gain their trust.
- Joining in because they think that 'everyone is doing it'.
- Boosting their self-esteem.
- Flirting with others and testing their sexual identity.
- Exploring their sexual feelings.
- To get attention and connect with new people on social media.

Students often do not realize that in creating and sending these images they are potentially committing a criminal act. Ideally, we would not want to deal with these issues as criminal acts. Learning and support can be a more beneficial way of tackling sexting. Staff must report



any incident of sexting to the DSL on the school concern form.

5.Mental Health

ISP are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. School staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by capturing the concern on the school's concern form and speaking to the Designated Safeguarding Lead or a deputy.

6.Self-Harm

Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. This is why it is so important for schools to spot it as soon as possible and do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. So, whatever the reason, it should be taken seriously.

The exact reasons why children and young people decide to hurt themselves are not always easy to work out. In fact, they might not even know exactly why they do it, but there are links between depression and self-harm. Quite often a child or young person who is self-harming is being bullied, under too much pressure, being emotionally abused, grieving, or having relationship problems with family or friends. The feelings that these issues bring up can include low self-esteem, low confidence, loneliness, sadness, anger, numbness, and lack of control in their lives. Young people will sometimes go to great lengths to cover self-harm scars or injuries and/or they will explain any indications of self-harm as accidents.

There are some common themes that may help staff identify concerns including:

- Physical indicators such as cuts, bruises, burns, bald patches (where hair has been pulled out).
- Emotional indicators such as depression, sudden weight loss, drinking or drug-taking, or unusual eating habits and isolation or withdrawal.

If staff suspect that a student is self-harming this must be referred to the Designated Safeguarding Lead who will consider the next steps. It is likely that this will require discussion with the student involved and their Parents/Carer's to agree a course of action or referral to an organisation that may be able to support the student.



7.Radicalisation and Extremism

Children can be vulnerable to extremist ideology and radicalisation. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

ISP values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or leads to violence and harm of others, goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Any freedom of speech which promotes violence against anyone or anything else will not be tolerated.

A short awareness course on Extremism can be found at the following link:

http://course.ncalt.com/Channel_General_Awareness/01/index.html

8.Female Genital Mutilation (FGM)

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with through the procedures set out in this document i.e., concerns and signs of FGM must be reported to the DSL.

FGM is potentially damaging to children both emotionally and in terms of health issues and is in breach of a number of articles under the UN convention on the rights of the child. It is illegal in 26 countries across Africa and the Middle East, as well as in 33 other countries including the United States of America and the UK.

We recognise that this is cultural practice in some countries and not always seen as abusive. While not condoning the practice, we need to be aware of the sensitivities surrounding it and always act in the student's best interests.

9.Forced marriages (FM)

A Forced marriage (FM) is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g., threats, physical violence, or sexual violence) or emotional and psychological pressure (e.g., if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

In 2013, the first United Nations Human Rights Council also adopted a resolution against child and forced marriages. This resolution recognises child, early, and forced marriage as involving violations of human rights which "prevents individuals from living their lives free from all forms of violence and has adverse consequences on the enjoyment of human rights, such as the right to education."

As with FGM and some other cultural practices, we need to be aware of the cultural sensitivities but always act in the students' best interests. However, the school procedures



must be followed in the same way as for any other safeguarding or child protection matter.

10.Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's attendance policy and unauthorised absence and children missing from education procedures.

11.Domestic Abuse

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer abuse is sometimes referred to as 'teenage relationship abuse'.

12.Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

12.Fabricated and Induced illness

In fabricated illness the perpetrator (usually a parent or carer) does not directly harm the child but reports to doctors a clinical story which is eventually established to be fabricated. Whereas with induced illness the perpetrator inflicts direct (hands on) harm to the child. This can range from trivial injuries such as pricking the child to add blood to urine, through to suffocation. All schools must have a robust attendance policy to aid the monitoring of child illnesses. When a parent reports that a child has an illness which requires a health plan the



school must work in collaboration with the medical practitioner treating the child.

Note:

The above is not an exhaustive list of all the potential forms of abuse which staff may have to deal with on occasions. For information, please see “Keeping Children Safe in Education” 2021. This is a UK publication, but the types of abuse discussed are valid and can apply to any country around the world. All staff are required to read and acknowledge receipt of Part 1 of the document.

PREVENTATIVE MEASURES AND LINKED POLICIES FOR SAFEGUARDING CHILDREN

1. E SAFETY

The growth in electronic media in everyday life and an ever-developing variety of devices create additional risks for children. Risks and dangers of being online include:

- Inappropriate content.
- Ignoring age restrictions and communicating with unknown adults or other children (which make children vulnerable to bullying and grooming).
- Grooming and sexual abuse.
- Sharing personal information.
- Gambling or running up debts.
- Cyber Bullying.

Cyber bullying is an increasingly common form of bullying behaviour and is most often related to social networks and mobile phones.

ISP believes the best way to protect our students is to teach awareness and understanding of risk, particularly through personal, social and health education, sex and relationship education or wellness programmes. Each school’s curriculum includes appropriate and frequent opportunities to teach children how to recognise when they and others are at risk and equips them with the skills, strategies, and language they need to take appropriate action.

2. MOBILE PHONE AND CAMERA IMAGES.

It is our policy that practitioners, teachers, and visitors to our Early Years settings should not use personal mobile phones to take images of children. In our primary and secondary schools, if personal equipment is used to capture child images, these images should be uploaded to the schools’ system as soon as possible and immediately deleted from personal equipment. These measures must be completed before a member of staff leaves the school premises at the end of a school day. Permission to capture images, videos or audio recordings should be sought from the Designated Safeguarding Lead or Principal for the school.

At the beginning of school events parents should be reminded of the restriction of taking photos and videos on school site and that they must not take images of any child other than their own.



3. PUBLICATION OF SCHOOL ACTIVITIES ON DIGITAL PLATFORMS

ISP are aware that the use of digital platforms and social media in particular can make children particularly vulnerable to 'grooming'. Therefore, all ISP staff will ensure that when promoting school activity on these platforms they adhere to the following measures:

- Always asking for written consent from a child and their parents or carers before taking and using a child's image.
- Always explaining what images will be used for and what potential risks are associated with sharing images of children.
- Making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published.
- Changing the names of children whose images are being used in school published material whenever possible (and only using first names if we do need to identify them).
- Never showing screen shots of video conferencing lessons or meetings that show children's faces and full names.
- Only using images of children in appropriate clothing.
- Avoiding full face and body shots of children taking part in activities such as swimming.
- Never publishing personal information about individual children and disguising any identifying information.
- Making sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information)
- Reducing the risk of images being copied and used inappropriately by using correct settings on digital platforms.

Photographs for School Publications and Marketing:

- Photographs of students being used by staff for marketing are only taken on school cameras/devices.
- Images should be saved on a secure server/database and printed copies only used within the school for purposes such as displays, records and learning journals. Images to be used for marketing need to be agreed with parents/carers before use.
- Visitors and parents/carers should be asked not to use mobile devices within the school and/or early years setting, except where permission has been granted to capture images of their own child or children. All parents/carers must give permission for photographs to be used for publicity purposes and to sign a disclaimer if they do not wish their child's image to be used externally.

Failure of staff to adhere to the above measures to safeguard the children in our care will result in disciplinary action

4. Anti-Bullying

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Staff at every level will take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to



prevent repeat incidents or behaviours. Bullying may involve either face-to-face or the misuse of social media or technology. Each school should have its own policy and approach to restorative practices and all our schools will demonstrate a commitment to help resolve specific issues. ISP has a separate Anti-Bullying Policy Statement which must be referred to and fully referenced in relation to the bullying of any student.

5. Children with Special Educational Needs or Disabilities

All staff should recognise that children with Special Educational Needs and Disabilities can mean additional safeguarding challenges. Depending on the nature of a child's special need or disability, additional barriers can exist which make it more difficult to identify and recognise signs of abuse. For example, it is easy to assume that a child's mood, behaviour, or any injury relates to their disability rather than the fact they may be suffering abuse. It should also be recognised that children with disabilities may be disproportionately impacted on by behaviours such as bullying but they may not show any outward signs. Communication difficulties can make it very difficult for a child to indicate what's happening and, therefore, may make it very difficult to overcome any such barrier. Staff should be extra vigilant and report all concerns, avoiding making assumptions about the causes of any injury or behaviour.

6. Physical Intervention/restraint

There may be times when adults in schools, in the course of their school duties, have to intervene physically in order to restrain students and prevent them from coming to harm. Such intervention should always be both reasonable and proportionate to the circumstances and be the minimum necessary to resolve the situation.

Please also refer to the school's separate policy on physical intervention.

The Campus Principal should require any adult involved in any such incident to report the matter to him/her as soon as possible. The staff member is required to document the incident in full giving a description and full account of the incident. Witnesses to the incident should be identified where possible.

Where intervention has been required a senior member of staff should be asked to debrief the student and allow them to describe the incident from their point of view. Written notes of this conversation should be kept, and the student checked for any injuries.

Parents/carers should always be informed when an intervention has been necessary.

7. Safe Recruitment and Selection

Tenby Schools Penang will do all they can to ensure that all those working with children in our schools and across the whole organisation are suitable people. In order to do this, all staff who will work in an unsupervised capacity with children or young people will be recruited using safe recruitment procedures. (See ISP's recruitment policy statement, background checks policy statement and all relevant application notes).

Safe Recruitment involves scrutinising applicants through the interview process and application forms, verifying identity, qualifications and obtaining appropriate references, undertaking criminal background checks from all countries where the applicant has lived or worked in the last 10 years, as well as some additional recruitment checks.

At least one member of every interview panel at both the organisational and school level, who are interviewing for a post or posts that may have unsupervised contact with children,



will have undertaken safe recruitment training. All schools will keep a central record of all the recruitment checks undertaken on all staff. This record will include details relating to the DBS (Disclosure and Barring Service check - for anyone who has lived or worked in the UK only), i.e., date completed and number, other countries criminal records checks or certificates of good conduct, qualifications, prohibition order checks etc.

Where information is disclosed as part of the criminal records checking process, whether this is information about cautions, convictions or soft information, any disclosure will lead to a risk assessment being completed prior to appointment. This risk assessment will be signed off by the Principal, Group Health and Safety Director, Regional HR Manager and Regional Director for Schools.

8. Allegations against staff and volunteers

An allegation can be made against a staff member or volunteer at any point. It is important that any such allegations are treated seriously, and appropriate procedures followed.

An allegation is different to a complaint and can be defined as follows:

- Where someone has behaved in a way that has harmed or may have harmed a child.
- Where someone has possibly committed a criminal offence against a child.
- Where someone has behaved in a way towards a child or children that would pose a risk to children.


In the event of an allegation being made against a member of the school staff (or a volunteer helper), it will always be investigated by the Campus Principal unless a criminal act has been committed, in which case the matter should be referred to the local authorities where appropriate. In all cases (criminal or not) the Principal and Group H&S Director must be informed as soon as possible and certainly within 48 hours. In the case of the allegation being against the Principal, the Regional Managing Director and the Group H&S Director should be informed.

No action to investigate the concern should be taken before consultation with the Group H&S Director, and agreement reached about how best to approach and investigate the concern. If it is felt, after these initial consultations, that further enquiries are needed, then the member of staff may be suspended. Suspension is a neutral act, and in no way implies that the person is guilty of any wrongdoing. It is acknowledged that this would be distressing for the person concerned, and the school will do all it can to balance the interests of any individual with that of the need to keep children safe. The school will seek advice from the Group H&S Director before acting and will comply with national and locally agreed guidance on these matters. Each school is expected to have researched and mapped the local arrangements and guidance for dealing with allegations.

Staff will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within the code of conduct for staff and volunteers and the guidance for safe working practice, this includes school Intimate Care policies.

9. Whistleblowing

Tenby Schools Penang recognises that we cannot expect children to raise concerns in an environment where adults fail to do so. All staff and volunteers should be aware of their duty to raise concerns about the actions or attitude of colleagues. Appropriate concerns raised for the right reasons are considered to be a protected disclosure and, even if proven to be unfounded, no action will be taken against the whistle-blower.



Malicious whistleblowing, however, will be seen as a potential disciplinary matter. Tenby Schools Penang has a separate Whistleblowing Policy Statement which must be referred to and fully referenced in the event of such an incident.

PROCEDURES

1. Adults concerned about a student

If staff suspect that any student in their care may be a victim of abuse or is at risk of abuse or other form of harm, they should not try to investigate, and inform the Designated Safeguarding Lead (DSL) about their concerns as soon as possible.

Staff must disclose any concerns they have about the possibility of a student being abused or placing themselves at risk. It is better to share these concerns, which may later prove to be unfounded, than to hold onto information that may have helped protect a student from actual harm. In many cases a student will not make a direct disclosure, but staff will be concerned because of a physical or emotional indicator. In these circumstances staff should still use the record of concern form and the body map (if appropriate), to make a report to the Designated Safeguarding Lead.

Where any student makes any form of direct disclosure, the guidelines under the heading 'Dealing with Disclosure' below should be followed.

2. Disclosure, Reporting and Further Action

General Principles:

Note: Be aware that if a child asks to speak to someone in confidence about a problem, no one should ever promise confidentiality if what the child discloses or is likely to disclose relates to abuse being suffered by them or another child. Staff should always give this as a health warning before meeting with the child.

The following guidance is based on five key practices for all staff:

Receive

Where possible always stop and listen to a child who wishes to speak in confidence. We know that children will often find the most inconvenient time to do this, but it is important that you make time for the child, even if this is to say, "I can't stop now but come and see me in my office at...". Where possible during any disclosure try to listen, allow silences, and try not to show shock or disbelief.

Reassure

Try to stay calm, make no judgements and empathise with the child. Never make a promise you can't keep. Give as much reassurance as you can and tell the child what your actions are going to be. Reassure the child that they are doing the right thing by telling you.

React

React to what the child is saying only in as far as you need to for further information. Don't ask leading questions. Keep questions open such as... "is there anything else you need to tell me?". Try not to criticise the alleged perpetrator as this may be a family member for whom the child may still have feelings.



Record

Make brief notes about what the child says during the conversation, but if this is not possible, make notes as soon after as you can and certainly within 24 hours. Make sure to record exactly what the child says and not your interpretation of what is said. Record the time, date and place as well (see the record of concern form).

Report

Where a child makes any disclosure, or where you have concerns for any reason, it is very important that the procedures outlined in this document are followed. A full written/typed account of the concern (ideally using the record of concern form) should be passed to the Designated Safeguarding Lead as soon as possible and should include, where relevant, a completed body map.

Where a child has made a disclosure and alleges abuse, the Designated Safeguarding Lead (or Principal in the absence of the DSL), should be informed as soon as possible. The Designated Safeguarding Lead will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The Designated Safeguarding Lead will then consider and where necessary, consult on the information available. It is the role of the Designated Safeguarding Lead to make decisions about what action to take next and to make the decision whether to take the matter further within the local legal framework. It is important that a full record of all the information and decisions made are recorded and stored confidentially.

Tenby Schools Penang recognises the diverse and complex local contexts our schools operate in. Therefore, the following principles are taken into account when following the framework and procedure for disclosure, reporting and further action:

As International Schools we:

- often reside in cities and countries that offer little external support.
- recognise the limitations in the areas of child protection.
- need to assess the quality and skills of counsellors and other support staff in dealing with children who have suffered harm or self-harm, in order to determine the boundaries of their work.
- need to act in accordance with local legislation as well as the principles and practices outlined in this policy.

3. Local Safeguarding Agencies/Advice

- **Talian Kasih 15999 (Formerly Childline Malaysia)**
This helpline is for abused or lonely children, as well as a helpline for reporting cases of abuse.
- **Department of Social Welfare Malaysia, Ministry of Women, Family and Community Development**
Tingkat 21-24
Menara Tun Ismail Mohamed Ali
Jalan Raja Laut
50562 Kuala Lumpur, Malaysia
Tel: 603 - 2697 1090
Website: www.jkm.gov.my
jkm@selangor.gov.my



- **Police Station**, Tanjung Tokong: 04 890 3444
- **Medical Officer** of Penang General Hospital OSCC (One Stop Crisis Centre), Georgetown: 04 222 5333
- **Welfare:**
Women's Centre for Change, Jalan Burmah, Penang: 04 2280342
Children's Protection Society, Jalan Scotland, Penang: 04 829 4046 / 04 826 9809
- *Talian Nur/Hotline:15999*

4. Record Keeping and Confidentiality

Record Keeping

All records of child protection concerns, disclosures or allegations should be treated as sensitive information and should be kept together securely and separately from the child's general school records. The information should be shared with all those who need to have it, whether to enable them to take appropriate steps to safeguard the child, or to enable them to carry out their own duties, but it should not be shared more widely than that.

- Child protection records should be stored in a secure (i.e., locked) filing cabinet. Safeguarding information must not be recorded on Engage. Files will be accessible through the Designated Safeguarding Lead.
- Records of any child disclosure should be clearly dated and filed without future amendment.
- Child protection records should be separate to the general education file, but the child's general school record file should be marked to indicate that a child protection file exists (e.g., red star or similar). All staff who may need to consult a child's school file should be made aware of what the symbol means and who to consult if they see this symbol.
- A child protection file should be started for an individual child as soon as the school is aware of any child protection concerns about that child. This may arise in a number of ways e.g.:
 - If a member of staff raises a concern about the welfare or well-being of a child – this should be recorded in writing (see below for guidance).
 - If information is forwarded to the school by a previous school attended by the child.
 - If the school is alerted by another agency of child protection concerns about that child.
- Members of staff should make a written account of any concern they have regarding the welfare or well-being of a child, using the school's pro forma. This record should be passed as soon as possible to the Designated Safeguarding Lead. Concerns, which initially seem trivial, may turn out to be vital pieces of information later. So, it is important to give as much detail as possible. A concern raised may not progress further than a conversation with the Designated Safeguarding Lead but could also potentially lead to matters being dealt with through a legal system. If there hasn't been a specific incident that causes concern, try to be specific about what it is that is making you feel worried.
- If any information is removed from a file for any reason, a dated note should be placed in the file indicating who has taken it, why and when.



- The record pro forma should include (see Record of Concern Form):
 - A record of the child's details: name, date of birth, address and family details.
 - Date and time of the event/concern.
 - The nature of the concern raised.
 - The action taken and by whom: Name and position of the person making the record.

In the case of disclosure, remember the record you make should include:

- As full an account as possible of what the child said (in their own words).
- An account of the questions put to the child.
- Time and place of disclosure.
- Who was present at the time of the disclosure.
- The demeanour of the child, where the child was taken and where returned to at the end of the disclosure.

5. Confidentiality

Tenby Schools Penang regards all information relating to individual Safeguarding/child protection issues as confidential and treats it accordingly. Information should be passed on to appropriate persons only at the discretion of the Campus Principal/Designated Safeguarding Lead and this should always be based on the need to know.

All records relating to child protection should be secured appropriately.