SERI BOTANI INTERNATIONAL SCHOOL

CHILD PROTECTION AND SAFEGUARDING POLICY

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Signed by:

A Hamilton

Principal

Mr Andrew Hamilton

27/08/2026

Date

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1. Policy Statement & Purpose

1.1 Policy Statement

At Seri Botani International School, we are fully committed to safeguarding and promoting the welfare of all children and young people in our care. Safeguarding is the foundation of our work and is central to everything we do. We recognise our duty of care under Malaysian law, including the *Child Act 2001*, the *Sexual Offences Against Children Act 2017*, and the *Personal Data Protection (Amendment) Act 2024*, as well as our responsibility to uphold the principles of the *United Nations Convention on the Rights of the Child (UNCRC)*.

We believe every child has the right to:

- Be safe, protected from harm, and free from abuse, neglect, exploitation, and discrimination.
- Learn and grow in an environment that respects their dignity and individuality.
- Have their voice heard in matters that affect them.
- Access appropriate support and intervention when concerns arise.

Safeguarding is the responsibility of all adults in our community which applies to staff, volunteers, contractors, parents, and visitors. We adopt a zero-tolerance approach towards any behaviour that places a child at risk of harm.

1.2 Purpose

This policy provides a clear framework for safeguarding and child protection at our school. Its purpose is to:

1. **Set Clear Standards**
   - Define what safeguarding means in our school context.
   - Outline expectations for behaviour, conduct, and professional practice.

2. **Ensure Compliance**
   - Align with Malaysian child protection legislation, guidelines from the Ministry of Education, and best practices from international safeguarding frameworks.

3. **Promote Prevention**
   - Embed safeguarding into all aspects of school life, including curriculum delivery, behaviour management, online learning, extra-curricular activities, and supervision of facilities.
   - Highlight the role of attendance monitoring in safeguarding, ensuring children's regular presence in school is tracked and followed up promptly.

4. **Clarify Roles and Responsibilities**
   - Identify the responsibilities of the Board, Principal, Designated Safeguarding Lead (DSL), staff, students, parents, and other stakeholders.
   - Ensure that all staff and volunteers understand their duty to act if they have a safeguarding concern.

5. **Guide Reporting and Response**
    - Provide clear procedures for raising, recording, and escalating concerns.
    - Ensure children and families know how to access help and support.
      Outline when and how referrals should be made to external agencies such as *Jabatan Kebajikan Masyarakat*, Police, or healthcare services.

6. **Protect Data and Confidentiality**
    - Establish how safeguarding records are securely maintained and who has access.
    - Ensure sensitive information is shared only on a need-to-know basis in line with the PDPA.

7. **Support Continuous Improvement**
    - Provide a framework for ongoing training, monitoring, and evaluation of safeguarding practices.
    - Commit to reviewing and updating the policy regularly to reflect legal changes and evolving best practices.

2. Definitions & Key Principles

2.1 Definitions

For clarity and consistency, the following terms are defined as they are used within this policy:

Term	Description
Safeguarding	The proactive process of creating and maintaining a safe environment in which children's welfare is promoted and their rights are protected. Includes preventing harm, protecting health and development, ensuring children grow up in safe environments, and taking action to enable children to achieve their potential.
Child Protection	A subset of safeguarding focused on protecting specific children who are identified as suffering, or at risk of suffering, significant harm. It involves immediate action to protect children from abuse or neglect.
Child	Any individual under the age of 18, as defined by the *Child Act 2001* and the *United Nations Convention on the Rights of the Child (UNCRC)*.
Wellbeing	A child's physical, emotional, social, and mental health. Wellbeing includes feeling safe, supported, valued, and able to learn and develop in a nurturing environment.
Physical abuse	Causing physical harm to a child, e.g. hitting, shaking, burning, poisoning, or otherwise inflicting injury.
Emotional abuse	Persistent maltreatment that affects a child's emotional development, e.g. verbal abuse, humiliation, intimidation, isolation, or exposure to domestic violence.
Sexual abuse	Forcing, pressuring, or enticing a child to take part in sexual activities (physical or non-physical), including online exploitation and exposure to inappropriate content.
Neglect	Persistent failure to meet a child's basic physical, emotional, educational, or medical needs, resulting in harm to their health or development.
Exploitation	Using a child for someone else's benefit, including child labour, trafficking, sexual exploitation, or online grooming.

Designated Safeguarding Lead (DSL)	The staff with responsibility for overseeing safeguarding, managing referrals, and ensuring staff are trained and supported in their safeguarding duties.
Staff and Volunteers	All adults working with children in the school, whether paid or unpaid, temporary or permanent.
Confidentiality	Ensuring that safeguarding information is only shared with those who need to know in order to protect a child.
Referral	The formal process of reporting a safeguarding concern to external agencies such as JKM, Police, or healthcare professionals.

2.2 Key Principles

Our safeguarding approach is guided by these principles:

1. **Best Interest First** – Every decision is made with the child's welfare as the top priority.
2. **Zero Tolerance** – No abuse, neglect, bullying, or exploitation will be accepted.
3. **Everyone's Responsibility** – Safeguarding is shared by staff, volunteers, parents, and visitors.
4. **Prevention First** – Early identification and intervention reduce risks before harm occurs.
5. **Child-Centred** – Children are listened to, respected, and involved in age-appropriate ways.
6. **Confidential but Clear** – Information is handled sensitively, shared only when necessary for safety.
7. **Accountable & Transparent** – Records are kept, procedures followed, and actions reviewed.
8. **Culturally Respectful** – Safeguarding respects cultural and religious diversity but never excuses harm.
9. **Always Improving** – Regular reviews, staff training, and updates ensure best practices are in place.

3. Legal framework

SBIS operates in Malaysia and complies with applicable Malaysian legislation, regulations and requirements issued by the relevant authorities. The school also adopts internationally recognised safeguarding principles and guidance where appropriate. International guidance supplements, but does not replace or override, Malaysian legal requirements.

Legislation

MALAYSIA

- Child Act 2001 (Act 611), as amended.
- Penal Code (Act 574), as amended.
- Education Act 1996 (Act 550), as amended, and applicable regulations.
- Sexual Offences Against Children Act 2017 (Act 792), as amended.
- Domestic Violence Act 1994 (Act 521), as amended.
- Anti-Sexual Harassment Act 2022 (Act 840).
- Anti-Trafficking in Persons and Anti-Smuggling of Migrants Act 2007 (Act 670).
- Communications and Multimedia Act 1998 (Act 588), as amended.
- Personal Data Protection Act 2010 (Act 709), as amended by the Personal Data Protection (Amendment) Act 2024.
- Applicable Ministry of Education regulations, circulars and school safety guidelines.

INTERNATIONAL SAFEGUARDING GUIDANCE AND BEST PRACTICE

- Keeping Children Safe in Education 2026 — UK Department for Education.
- Working Together to Safeguard Children — UK Department for Education, using the current applicable edition.
- UN Convention on the Rights of the Child (UNCRC).
- International Task Force on Child Protection recommendations.
- International Centre for Missing & Exploited Children (ICMEC) safeguarding resources.

International safeguarding guidance is adopted as a benchmark for good practice where appropriate to the Malaysian context. References to UK legislation or statutory guidance do not imply that such provisions have direct legal application to SBIS.

4. Roles & Responsibilities

Key contacts for Child Protection and Safeguarding

Position	Name	Email	Telephone
Board Safeguarding Lead	Seow Koh Han *Director of the Board*	kh.seow@sbis.edu.my	Ext 1000
Designated Safeguarding Lead (DSL)	Michelle Chew	michelle.chew@sbis.edu.my	Ext 2012
Deputy Designated Safeguarding Lead	Andrew Hamilton *Principal*	andrew@sbis.edu.my	Ext 2001

4.1 Board of Governors (BOG)

The Governing Body has ultimate responsibility for safeguarding. Specifically, it will:

- Approve and review the safeguarding policy annually.
- Ensure the school complies with Malaysian law (*Child Act 2001*, *Sexual Offences Against Children Act 2017*, PDPA) and Ministry of Education guidelines.
- Ensure the Principal and DSL are adequately resourced and supported.
- Receive regular safeguarding reports (including attendance, training, incidents, referrals).
- Hold the Principal accountable for the effectiveness of safeguarding across the school.

4.2 Principal / Head of School

The Principal provides operational leadership for safeguarding and is responsible for:

- Establishing a safe and supportive school culture where safeguarding is prioritised.
- Ensuring the safeguarding policy and procedures are fully implemented and followed.
- Supporting the DSL in fulfilling his/her duties.
- Ensuring safer recruitment practices are consistently applied.
- Ensuring all staff receive mandatory safeguarding induction and ongoing training.
- Escalating safeguarding concerns to the Board when appropriate.

4.3 Designated Safeguarding Lead (DSL)

The DSL is the central point of contact for safeguarding concerns. The DSL will:

- **Manage Referrals**
  - Refer cases of suspected abuse or neglect to the *Jabatan Kebajikan Masyarakat* (JKM), Police, or relevant agencies.
  - Liaise with medical/mental health professionals when necessary.
  - Ensure timely escalation of unresolved concerns.

- **Record-Keeping**
  - Maintain secure, confidential safeguarding records.
  - Track cases, attendance concerns, and patterns of behaviour.

- **Staff Support**
  - Provide advice and guidance to staff on safeguarding matters.
  - Support staff involved in cases of concern.

- **Training & Awareness**
  - Deliver annual safeguarding training to staff and volunteers.
  - Ensure staff are updated on policy changes and new safeguarding risks (e.g. online safety).

- **Monitoring**
  - Review attendance data and identify children at risk through repeated or unexplained absences.
  - Monitor safeguarding practices and report findings to the Principal and BOG.

4.4 Deputy DSL

The Deputy DSL will:

- Act as safeguarding leads in the absence of the DSL.
- Share workload for record-keeping, staff support, and training.
- Attend regular training to remain updated and competent.
- Provide presence across different areas of the school (e.g. Secondary, Primary, Boarding if applicable).

Where the DSL and Deputy DSL are unavailable, safeguarding concerns must be referred immediately to the Deputy Principal or another designated safeguarding-trained senior leader. The school will maintain an identified safeguarding contact for boarding, residential trips and other activities outside normal school hours. Where immediate danger exists, staff must contact emergency services directly without delay.

The Principal will maintain and communicate a current safeguarding escalation rota identifying the designated alternative safeguarding lead and out-of-hours contact arrangements. These details will be accessible to staff involved in boarding, school trips and activities outside normal school hours.

4.5 All Staff and Volunteers

All adults working in the school have a professional responsibility to safeguard children and must comply with applicable legal reporting obligations. Responsibilities include:

- Reading and understanding the safeguarding policy and Code of Conduct.
- Attending safeguarding training and refreshers.
- Being alert to signs of abuse, neglect, or exploitation (including changes in behaviour, attendance, or appearance).
- Reporting concerns immediately to the DSL or Deputy DSL, and not investigating on their own.
- Recording concerns factually and accurately using the school's safeguarding reporting system, **CPOMS**.
- Maintaining professional boundaries at all times (in person and online).
- Promoting a safe and inclusive environment for all students.

4.6 Parents and Guardians

Parents play a critical role in safeguarding and are expected to:

- Make sure their child attends school regularly and on time.
- Keep the school updated with correct contact and vehicle details.
- Inform the school promptly about absences or family circumstances affecting their child.
- Work with the school on safeguarding matters.
- Cooperate with the school in confirming the identity of any adult picking up their child, and ensuring only authorised persons do so.
- Drive safely within the school area, respecting speed limits, and only using designated drop-off/pick-up zones.
- Avoiding parking in dangerous or restricted areas, and following the instructions of staff on duty.

4.7 Students

Students also have responsibilities in creating a safe school culture:

- Respect themselves and others, both in person and online.
- Report concerns for their own or others' safety to a trusted adult.
- Follow school rules designed to protect them (e.g. signing in/out for e-hailing services, supervision rules, online safety guidelines).
- Support peers by encouraging them to speak out if they feel unsafe.

4.8 Visitors, Contractors, and External Providers

Anyone who enters the school site has safeguarding responsibilities:

- Must sign in at Gate A guardhouse and wear visible identification at all times.
- Visitors, contractors and external providers must not have unsupervised access to students unless appropriate safeguarding checks, risk assessments and school authorisation have been completed.
- Are expected to act professionally and respectfully at all times.
- Must report any safeguarding concerns immediately to the DSL or school staff.
  External providers (e.g. co-curricular coaches, bus operators) must comply with the school's safeguarding policy and complete mandatory checks.

5. Safe Recruitment & Vetting

Our school is committed to ensuring that only suitable and qualified individuals work with children. We follow strict recruitment and vetting procedures to protect students from harm.

Key Measures:

- **Pre-employment Checks**
  - Verify identity, qualifications, and employment history.
  - Obtain references from previous employers, including one from the most recent.
  - Ensure any gaps in employment history are explained.

- **Background Screening**
  - Obtain appropriate Malaysian and overseas criminal record checks where available and lawful, taking account of countries where the applicant has lived or worked.
  - Where checks cannot be obtained, document the reason, undertake alternative checks and complete a safeguarding risk assessment before permitting unsupervised contact with students.
  - Repeat checks where required by law, school policy or a documented risk assessment.

- **Interview & Assessment**
  - Include safeguarding-related questions in interviews.
  - Assess candidates' attitudes towards working with children.

- **Conditional Employment**
  Employment offers are subject to satisfactory background checks and references.
  - Staff may not begin unsupervised work with children until checks are completed.

- **Ongoing Safeguarding Culture**
  - All staff must sign a Code of Conduct and safeguarding declaration upon joining.
  - Regular training ensures staff remain aware of their safeguarding responsibilities.
  - HR will maintain a confidential central record of recruitment checks, including verification dates, outstanding actions and authorisation to commence work. Contractors, coaches, volunteers and third-party staff must meet the school's applicable safeguarding requirements.

6. Prevention

6.1 Key Safeguarding Pillars

We believe safeguarding works best when risks are reduced **before** they become harm. Prevention at our school is built on **five key pillars**:

Pillar 1: Safe Environment

- Secure entry and exit points with staff monitoring.
- CCTV and visitor management systems.
- Risk assessments for classrooms, labs, playgrounds, and school trips.
- Staff supervision during arrival, dismissal, and break times.

Pillar 2: Curriculum & Student Empowerment

- Safeguarding topics (online safety, bullying, consent, healthy relationships) taught through PSHE/PSL lessons, assemblies, and class discussions.
- Peer support initiatives (buddy systems, student leaders).
- Activities that build resilience, self-esteem, and awareness of rights.
- Teaching students to identify trusted adults and safe spaces in school.

Pillar 3: Trained & Vigilant Staff

- All staff receive annual safeguarding training.
- Staff learn to spot early warning signs of abuse, neglect, or emotional distress.
- Positive behaviour management is used instead of punitive measures.
- Staff create a classroom culture where students feel listened to.

Pillar 4: Partnership with Parents

- Regular communication about student wellbeing.
- Workshops on digital safety, positive parenting, and emotional support.
- Road safety reminders: safe driving & cooperation with school drop-off/pick-up protocols.
- Joint responsibility for monitoring attendance and punctuality.

Pillar 5: Early Intervention & Support

- Attendance monitoring to spot patterns of concern.
- Counselling and mentoring for vulnerable students.
- Referral pathways to child protection services, social workers, or external agencies.
- Individual care plans for students with specific needs or risks.

6.2 Physical Contact & Touch

Staff members must maintain appropriate physical and professional boundaries at all times.

Physical contact with students must be kept to a minimum and governed by these strict rules:

1. **General Prohibition:** Staff must not initiate unnecessary physical contact or touch students in a way that is intrusive, culturally inappropriate, or uncomfortable for the student.
2. **Permissible Physical Contact:** Touch is strictly limited to necessary, age-appropriate, or professional situations, such as:
    - Administering First Aid or medical attention by authorised staff.
    - Providing immediate physical support during physical education, sports coaching, or performing arts instruction (where demonstrated professionally and with prior explanation).
    - Comforting a young or distressed child in an open, visible environment (e.g., brief pat on the shoulder or hand holding for early years).
    - Emergency safety interventions (e.g., physically holding or guiding a child to prevent immediate self-harm, falling, or physical injury to themselves or others).
3. Staff must never use physical contact as punishment, touch a student inappropriately, or engage in contact that could constitute abuse or grooming. Physical contact should take place in an open or observable environment wherever practicable. Where privacy is necessary for medical care, personal care or immediate safety, staff must follow approved procedures, maintain appropriate safeguards and record any significant intervention.

6.3 Prohibition of Corporal Punishment and Inappropriate Physical Intervention

SBIS strictly prohibits corporal punishment, physical aggression and the use of physical restraint as a form of punishment.

Staff must never hit, slap, shake, pinch or deliberately inflict pain or humiliation on a student.

Physical intervention may only be used where necessary and proportionate to prevent immediate harm to a student or another person. Any intervention must use the minimum force necessary and end as soon as the immediate danger has passed.

Any incident involving physical restraint must be reported immediately to the DSL and Principal, documented in CPOMS before the end of the working day where practicable, and reviewed to determine whether further safeguarding action is required.

6.4 Boarding and Residential Safeguarding

SBIS recognises that boarding students may face additional safeguarding risks due to living away from their families. The school will ensure appropriate supervision, safe accommodation, clear professional boundaries and accessible reporting arrangements.

Boarding staff must follow the school's safeguarding procedures, including reporting concerns through CPOMS and contacting the designated safeguarding lead where urgent action is required.

Specific procedures for overnight supervision, room access, student absence, visitors, medical emergencies, student privacy and welfare checks will be detailed in the Boarding Policy.

7. Media, Photography & Videography

7.1 Purpose & Scope

- To celebrate students' achievements, share learning, and promote school programmes, while ensuring the dignity, privacy and safety of all students.
- Applies to all staff, volunteers, contractors, parents, visitors, external media and anyone authorised to take photographs, videos, or audio recordings within school premises or during school-sponsored activities both on and off site.

7.2 Consent & Notification

- Written consent must be obtained from parents or legal guardians at the time of enrolment for general media usage. An option must be provided to opt out or limit how the image/video may be used. (E.g. internal displays only, not on social media, etc.)
- Separate written consent must be obtained where the intended use of images or recordings falls outside the scope of the consent already provided. The school must clearly communicate the intended purpose, publication channels and arrangements for withdrawal.
- Students themselves should be asked for assent (if of an age and understanding) and allowed to decline being photographed or recorded.
- Media consent must be recorded centrally, accessible to authorised staff and checked before publication. Withdrawal of consent must be reflected promptly in the school's records.

7.3 Use of Devices & Storage of Media

- Staff must use school-approved devices when photographing or recording students. Personal devices must not be used unless expressly authorised by the Principal or DSL. Where an immediate emergency makes prior authorisation impracticable, any necessary recording must be reported promptly to the DSL or Principal, securely transferred to an approved school system and deleted from the personal device once safe to do so.

7.4 Publication & Public Use

When publishing or sharing on external or public platforms (school website, social media, press, marketing material), the following must be ensured:

1. The image/video is appropriate, dignified, students are properly dressed and the context is suitable.
2. Full names of students should not be used where possible; use first names only, or pseudonyms, especially with public exposure.
3. Any identifiable student information (e.g. school uniform with name badge, home address, contact details) should not be revealed.
4. Consent forms must indicate that once images/videos are made public, withdrawal of consent may not guarantee removal from all locations (e.g. printed materials, third party publications).

7.5 Events & External Photographers / Media

1. For events where media or external photographers are present:
    - Parents should be informed in advance about the presence of media/photographers, and given the opportunity to withhold consent for their child being photographed/filmed.
    - External photographers must be briefed on the safeguarding policy, must sign any required agreements (e.g. not to use images beyond agreed purpose, not to retain extra copies beyond agreed period), and be supervised while on site.

2. School events which allow parents/guardians to take photographs/video:
    - Parents are reminded to only take images of their own child(ren), to respect other students' privacy.
    - Parents should be informed not to publish images featuring other children without those children's parents' permission.

7.6 Storage, Security & Access

- All media (photo, video, audio) must be stored securely in school systems with controlled access.
- The school will ensure appropriate technical and organisational measures to protect media from misuse, loss, or unauthorised access.
- Photographs, videos and audio recordings will be retained only for as long as necessary for their authorised purpose, in accordance with the school's Data Retention and Records Management Policy. Access will be restricted to authorised personnel. Any suspected loss, unauthorised disclosure or misuse of personal data must be reported immediately to the school's designated data protection contact.

The school will maintain procedures for identifying, assessing and escalating personal data breaches in accordance with applicable Malaysian data protection requirements.

7.7 Withdrawal & Complaints

- Parents or guardians may withdraw or amend media consent by contacting the school administration in writing. Students may also raise concerns directly with the DSL or a trusted member of staff. Changes will be recorded centrally and communicated to relevant staff.
- Upon withdrawal, new use of images/videos must cease; existing publications may not always be retractable (especially external media or printed/archived materials); this should be clearly communicated.
- Complaints from parents or students about improper use of media should be addressed promptly via the school's safeguarding / grievance procedure.

7.8 Upskirting

Upskirting refers to the taking or attempted taking of images or videos beneath a person's clothing without their knowledge or consent. SBIS strictly prohibits this behaviour. Incidents may constitute offences under applicable Malaysian legislation and will be assessed for referral to the relevant authorities.

- Any incidents will be reported immediately to the Designated Safeguarding Lead (DSL).
- The DSL will assess the situation and determine the appropriate response.
- Where necessary, the matter will be referred to the police or other relevant authorities.

Staff must not forward, copy or unnecessarily view intimate images. Any evidence must be handled securely in consultation with the DSL and relevant authorities.

7.9 Online and AI-Related Safeguarding

SBIS prohibits the creation, manipulation, possession or distribution of sexualised or abusive images of students, including images generated or altered using artificial intelligence.

Staff must not upload identifiable student images or sensitive student information to unauthorised AI platforms or applications.

Suspected grooming, sextortion, image-based abuse or the circulation of intimate images must be reported immediately to the DSL. Staff must not copy, forward or unnecessarily access such material. The DSL will determine appropriate safeguarding, evidence-preservation and external reporting measures.

8. Attendance

Regular school attendance is a key component of safeguarding. A child who is absent from school without a clear reason may be at risk of harm, neglect, or other safeguarding concerns.

Expectations

- Parents/guardians must inform the school of the reason for absence by the start of the school day.
- Medical certificates or relevant documentation may be requested for extended or frequent absences.
- The school will monitor patterns of absence and lateness as part of its duty of care.
- Medical appointments should, where possible, be scheduled outside school hours.

Actions

- Unexplained student absences will be followed up with parents or guardians on the same school day.
- Repeated unexplained absences or concerning attendance patterns will be referred to the relevant pastoral leader and DSL.
- Where there are concerns for a student's immediate safety, the school will initiate its emergency response procedures without delay.
- Students missing during the school day, including unexplained departures from campus, will be managed under the school's Student Safety Procedures.
- All significant safeguarding concerns arising from attendance will be recorded in CPOMS.

9. Child-on-child abuse

The school recognises that child-on-child abuse can occur between students of any age or gender, both in school, outside of school, and online. All staff are expected to challenge inappropriate behaviour between students and must never dismiss it as “banter” or “part of growing up.”

Forms of child-on-child abuse may include:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate relationships between peers (“teenage relationship abuse”).
- Physical abuse, which may also be encouraged or facilitated online.
- Sexual violence, including cases with an online element.
- Sexual harassment, including online sexual harassment.
- Forcing or coercing someone to engage in sexual activity without consent.
- Sharing of nude or semi-nude images and/or videos, whether consensual or non-consensual.
- Initiation or hazing-type violence and rituals, which may involve harassment, abuse, or humiliation, and may also take place online.

9.1 Students Requiring Additional Safeguarding Support

Some students may face additional barriers to recognising, communicating or reporting abuse. This may include students with special educational needs or disabilities (SEND), limited English proficiency, communication difficulties, challenging family circumstances or residential boarding arrangements.

The school will provide appropriate communication, supervision and pastoral support to ensure that all students can access safeguarding assistance.

9.2 Responding to Child-on-Child Abuse

All allegations of child-on-child abuse will be taken seriously and assessed by the DSL. The school will:

1. Take immediate steps to protect the students involved.
2. Record the concern in CPOMS and determine whether external referral is required. In urgent situations, immediate verbal escalation is required to the DSL or Deputy DSL.
3. Conduct a documented risk assessment, including whether students should be separated or supervision increased.
4. Ensure that any internal investigation is appropriate and does not interfere with statutory investigations.
5. Provide appropriate support to the affected student and the student against whom the allegation has been made.
6. Inform parents or guardians where appropriate and safe.
7. Document findings, decisions, protective measures and follow-up reviews.

The school will distinguish between inappropriate behaviour, bullying and abuse while recognising that serious incidents may require immediate action.

Where an adult is suspected of impersonating a child to groom, exploit or abuse students, the DSL will immediately assess the need for police referral and protective action.

Protective arrangements will be reviewed regularly to ensure that students remain safe and that there is no retaliation, intimidation or further harm. Support and monitoring will continue for as long as reasonably necessary.

9.3 Student Support

- Students will be taught how to raise concerns or report incidents, including concerns about friends or peers.
- They will be reassured that all reports will be taken seriously, handled appropriately, and followed up with support to ensure their safety and wellbeing.

10. Policy on Staff Transporting Students

The school is committed to ensuring the safety and wellbeing of all students. To minimise safeguarding risks, the practice of staff transporting students in private vehicles is **not encouraged**. Where it is unavoidable, clear procedures must be followed.

10.1 General Principle

- Student transport by staff should only occur in exceptional circumstances (e.g., medical emergencies, official school activities).
- The preferred method of student transport remains school-arranged buses, vans, or authorised transport providers.

10.2 Safeguarding Requirements

- Staff must hold a valid driving licence and ensure their vehicle is roadworthy and appropriately insured.
- Where practicable, two authorised adults should accompany students. If a staff member must transport a student alone, the arrangement must be risk-assessed, authorised and communicated to parents or guardians in advance, except in an emergency.
- Journeys should be direct and not involve unscheduled stops.
- Any unavoidable emergency transport must be reported to the Principal as soon as practicable and documented.
- Students must sit in the back seat unless medically necessary.

10.3 Accountability

- Any transport of students by staff in connection with school activities must be authorised in advance by the Principal or designated senior leader, except where an immediate emergency makes prior authorisation impracticable.
- Written parental consent and journey details must be recorded for planned transport. In emergencies, any inability to obtain prior consent must be documented and parents informed as soon as practicable.
- Private transport arrangements between staff and families must not be represented as school-authorised activities unless formally approved. Any safeguarding concerns arising from such arrangements remain subject to the school's reporting procedures.

11. Recognising Signs and Raising Concerns

Keeping children safe requires staff, parents, and the wider school community to be alert to possible indicators of abuse, neglect, or harm, and to know how to respond appropriately.

11.1 Recognising Signs of Abuse or Neglect

All staff should be aware of the **four main categories of abuse** as outlined in safeguarding guidance:

- **Physical Abuse** – Unexplained injuries, frequent "accidents," reluctance to change clothes, or inconsistent explanations.
- **Emotional Abuse** – Low self-esteem, excessive withdrawal, fearfulness, lack of attachment, or inappropriate emotional responses.
- **Sexual Abuse/Exploitation** – Knowledge or behaviour inappropriate for age, sudden changes in behaviour, avoiding certain people, reluctance to participate in activities.
- **Neglect** – Persistent poor hygiene, frequent absences, inadequate clothing, constant hunger, or lack of medical care.

Other specific safeguarding issues include:

- Child on child abuse
- Cyberbullying
- Self-harm or suicidal thoughts
- Radicalisation or extremist influences
- Online grooming or unsafe internet behaviour

These specific safeguarding issues have been outlined in **Appendix B**.

11.2 Staff Responsibilities

- Remain observant and professionally curious if a child shows changes in behaviour, physical signs, or emotional distress.
- Listen carefully and without judgment if a child makes a disclosure.
- Avoid making promises of confidentiality. Explain that information may need to be shared to keep them safe.
- Record all concerns factually in CPOMS, with dates, times, and details of what was seen or heard.

11.3 Reporting and Escalation

- **Immediate Risk:** Where a child is in immediate danger, staff must take immediate protective action and contact emergency services (999) where required. The DSL or Deputy DSL must be informed as soon as it is safe to do so. Staff must not delay emergency action while seeking internal approval.
- **Non-urgent Concerns:** All other concerns must be reported directly to the DSL or Deputy DSL using the school's safeguarding digital reporting system**,** CPOMS.
- **Confidentiality:** Information will be shared strictly on a need-to-know basis to protect the child.
- **Follow-Up:** The DSL will acknowledge safeguarding reports, assess the concern and determine appropriate action. Feedback will be provided to the reporting staff member where necessary and appropriate, without disclosing confidential information unnecessarily.

Where a concern involves the Principal or DSL, escalation must follow the independent reporting arrangements set out in Section 12.2.

All safeguarding concerns must be recorded in CPOMS as soon as practicable and normally on the same working day. Where immediate risk exists, staff must make direct verbal contact with the DSL or appropriate emergency services before completing the record.

The DSL will review reported concerns promptly, assess the level of risk, determine immediate protective actions and record the rationale for decisions made. Cases requiring ongoing support will have an identified case owner, documented actions and review dates.

If a concern remains unresolved, or a staff member believes that appropriate action has not been taken, the matter must be escalated to the Principal, Board Safeguarding Lead or relevant external authority, as appropriate.

11.4 Culture of Openness

The school promotes an environment where:

- Students feel safe to speak with staff, counsellors, or peers.
- Parents are encouraged to share home concerns that may affect their child's wellbeing.
- Staff know that safeguarding is everyone's responsibility, not just the DSL's.

12. Responding to an Allegation or Incident

Allegations or safeguarding incidents must be treated with **seriousness, fairness, and urgency**. The school follows clear procedures to ensure the safety of students while protecting the rights of all involved.

12.1 If a Child Makes a Disclosure

- **Listen attentively**: Allow the child to speak in their own words without interruption.
- **Stay calm and supportive**: Avoid showing shock, anger, or disbelief.
- **Do not investigate**: Do not ask leading questions or press for details.
- **Clarify but don't probe**: Only use open questions if clarification is needed ("Can you tell me more about that?").
- **Avoid promises of secrecy**: Explain that the information must be shared with those who can help keep them safe.
- **Record promptly**: Write down exactly what was said, noting the date, time, location, and people present.

12.2 If an Allegation is Made Against a Staff Member

- Allegations involving staff, volunteers or contractors must be reported immediately to the Principal.
- Where an allegation concerns the Principal, it must be reported directly to the Chair of the Board or designated Board Safeguarding Lead. Where it concerns the DSL, it must be reported to the Principal.
- The school will assess immediate safeguarding risks and determine whether external authorities must be notified before conducting an internal investigation.
- An impartial investigator will be appointed where appropriate, and any conflict of interest must be addressed.
- The staff member concerned will be informed of the allegation and given an appropriate opportunity to respond, subject to any restrictions necessary to protect the child or avoid compromising an external investigation.
- Temporary protective measures, including reassignment or suspension where justified, may be considered without presuming misconduct.
- All decisions, actions and outcomes will be documented securely in accordance with the school's Managing Allegations Against Staff Policy and applicable law.

12.3 School's Duty of Care

- **To the child** – Ensure immediate safety and emotional support, including counselling if needed.
- **To staff** – Ensure fair treatment, confidentiality, and support during the process.
- **To families** – Communicate appropriately while respecting privacy and investigation protocols.

12.4 Escalation and Referral

- Where a child is in immediate danger, the school will take immediate protective action and contact emergency services or the relevant authorities without delay.
- Where there is reasonable concern that a child has been abused, neglected or sexually exploited, the DSL must promptly assess the child's immediate safety and arrange referral to the appropriate authorities, including JKM and/or PDRM, as required. Any individual statutory reporting obligation must be fulfilled without waiting for internal approval or the outcome of a school investigation.
- Any legal duty to report must be fulfilled regardless of whether an internal school investigation has been completed.
- The school will not conduct an internal investigation in a manner that could interfere with police or child protection investigations.
- All referrals, decisions, actions and communications with external authorities will be recorded securely in CPOMS or another approved restricted-access system.
- Nothing in the school's internal reporting procedure removes or delays any individual's statutory obligation to report information directly to the relevant Malaysian authority.

Where information indicates the commission or intended commission of an offence covered by *Section 19 of the Sexual Offences Against Children Act 2017*, the person subject to the statutory reporting duty must ensure that the required information is provided to the officer in charge of the nearest police station. Staff must immediately inform the DSL of the concern, but internal notification does not replace any personal statutory reporting obligation.

12.5 Confidentiality & Records

- Safeguarding records must be maintained securely in CPOMS or another approved restricted-access system, separately from general academic and administrative records.
- Access must be limited to authorised personnel with a legitimate safeguarding, investigation or legal responsibility. Where a concern involves a person who would ordinarily have access, appropriate restrictions must be applied.
- Relevant information may be shared with HR, external authorities or receiving schools where lawful, necessary and appropriate.
- Records, including allegations and their outcomes, will be retained and disposed of in accordance with the school's Data Retention and Records Management Policy and applicable Malaysian law.

12.6 Low-Level Safeguarding Concerns About Adults

Any concern that an adult's behaviour towards a student may be inconsistent with the school's professional expectations must be reported to the Principal, even where the behaviour does not appear to constitute abuse.

Such concerns may include inappropriate communication, favouritism, boundary violations or conduct that could undermine student safety.

The Principal will assess the concern, consult the DSL where appropriate, document the outcome and determine whether further action is required under the Staff Code of Conduct.

Where the concern involves the Principal, it must be referred to the designated Board representative.

Repeated or escalating concerns will be reviewed to identify patterns of behaviour and determine whether a formal safeguarding investigation or external referral is necessary.

Staff who raise concerns in good faith will be protected from retaliation. Reports will be assessed objectively, with confidentiality maintained as far as reasonably possible. A concern being reported does not, by itself, establish misconduct.

13. Monitoring, Review & Audit

To remain effective, this policy is regularly monitored, reviewed, and audited.

13.1 Monitoring

- The **DSL** monitors safeguarding cases, attendance records, training compliance, and staff reporting.
- The **Pastoral Team** tracks trends in behaviour, wellbeing, and attendance that may indicate safeguarding risks.
- The **Senior Leadership Team (SLT)** receives termly safeguarding reports from the DSL.
- Safeguarding updates, training reminders and general learning points will be shared regularly with staff, without disclosing confidential case information.

13.2 Review

- This policy is formally reviewed **annually** by the DSL and Principal, and approved by the Board of Governors.
- Interim reviews may take place earlier in response to:
    - Legislative changes (e.g., amendments to the *Child Act 2001* or PDPA).
    - New safeguarding risks (e.g., digital trends, community concerns).
    - Outcomes from safeguarding cases or audits.
- Feedback from staff, students, and parents is considered when updating the policy.

13.3 Audit

An annual safeguarding audit will be coordinated by the DSL and reviewed by the Principal and Board. Findings, identified risks, corrective actions, responsible persons and completion dates will be documented and monitored.

The Board will receive an annual safeguarding assurance report covering training, reporting practices, recruitment compliance, case-management procedures and actions arising from safeguarding incidents.

Periodic independent safeguarding reviews may be commissioned to provide additional assurance regarding the effectiveness of the school's procedures.

13.4 Continuous Improvement

- Safeguarding is a **living policy** that evolves with the needs of students and the wider community.
- Lessons learned from incidents, concerns, and external feedback are integrated into practice.
- The school is committed to fostering a culture of openness where safeguarding is everyone’s responsibility.

Appendices

Appendix A (Key Contacts)

Emergency Services (Police/Ambulance/Fire): 999

Polis Bantuan Pinji Botanics Sdn. Bhd. (Bandar Seri Botani Auxiliary Police)
Medan Botani (Botani Village Commercial Centre), Bandar Seri Botani, 31350 Ipoh, Perak.
Main tel (Bandar Seri Botani): +605 226 2633
24-hour Hotline: 1700-81-9408
WhatsApp (police force): +6012-505 0075.

Balai Polis Simpang Pulai
Jalan Gopeng, Kawasan Perindustrian Gopeng, 31350 Kampung Kepayang, Perak
Tel: 05-357 1222

Ibu Pejabat Polis Daerah (IPD) Ipoh — District Headquarters
Jalan Panglima Bukit Gantang Wahab, 30000 Ipoh, Perak.
Tel: 05-245 1500.

Jabatan Kebajikan Malaysia (Perak State)
Address: Lot 1516, Jalan Panglima Bukit Gantang Wahab, Ipoh, Perak.
Telephone: **05-254 5505**
Fax: 05-254 6505

Talian Kasih
Hotline: 15999
WhatsApp: 019-2615 999

Contact details verified on: 3rd August 2026.
Periodic verification of key contacts will be done by Ms Michelle.

Appendix B (Specific Safeguarding Issues)

1. Child-on-Child Abuse

Definition: Abuse perpetrated by children against other children, which may occur across ages and genders. This behaviour can take place in person or through digital platforms.

Relevant Law:

- *Child Act 2001 (Act 611)* – Section 17: defines a child in need of protection, including cases of assault, emotional harm, or exploitation.
- *Penal Code (Act 574)* – covers assault, sexual offences, and harassment, regardless of age.

Examples:

- Bullying (verbal, physical, cyber, or prejudice-based)
- Sexual harassment or sexual violence
- Sharing of nude or semi-nude images
- Initiation or hazing-type behaviours

Possible Indicators:

- Unexplained injuries related to peer interactions
- Sudden withdrawal, anxiety, or isolation from friends
- Avoidance of school or social activities
- Changes in friendship groups or dynamics

2. Bullying and Cyberbullying

Definition: Repeated behaviour, or a serious single incident, intended to intimidate, humiliate, exclude or harm another student. Single incidents may also constitute abuse or serious misconduct.

Relevant Law:

- *Penal Code* – Sections 323–326: criminalises physical assault.
- *Communications and Multimedia Act 1998 (Act 588)* – Section 233: criminalises online harassment and offensive communication.
- *Education Ministry Circulars* also prohibit bullying within schools.

Examples:

- Spreading rumours online or offline
- Name-calling, insults, and prejudice-based comments
- Exclusion from social groups
- Online harassment through messaging, gaming, or social media

Possible Indicators:

- Reluctance to attend school
- Visible anxiety around technology use

- Damaged possessions or frequent “lost” belongings
- Withdrawal from peers or declining performance

3. Online Safety Risks

Definition: Risks to children’s wellbeing that arise from digital platforms, gaming, or online communication.

Relevant Law:

- *Communications and Multimedia Act 1998 (Act 588)*, as amended – relevant provisions concerning improper use of network facilities or services, where applicable.
- *Sexual Offences Against Children Act 2017 (Act 792)* – relevant provisions concerning child sexual exploitation, grooming and sexual offences against children.

Examples:

- Grooming for sexual or criminal exploitation
- Exposure to pornography, violent material, or extremist content
  Excessive or addictive gaming behaviour
- Cyber scams or online fraud

Possible Indicators:

- Secretive or anxious behaviour regarding online use
- Sudden possession of unexplained gifts or money
- Withdrawal from family activities
- Distress following digital interactions

4. Sexual Harassment and Sexual Violence

Definition: Unwanted behaviour of a sexual nature, which can include physical, verbal, or online conduct.

Relevant Law:

- *Anti-Sexual Harassment Act 2022 (Act 840)* – provides a framework for addressing harassment, including in education institutions.
- *Penal Code (Act 574)* – relevant provisions concerning sexual offences and other criminal conduct.
- *Sexual Offences Against Children Act 2017 (Act 792)* – relevant provisions concerning sexual offences against children.

Examples:

- Inappropriate sexual comments or jokes
- Unwanted touching or gestures
- Pressure to engage in sexual activity
- Circulation of sexual images without consent

Possible Indicators:

- Fear of specific individuals or groups
- Distress after certain social interactions
- Sexualised behaviour or knowledge beyond age expectations
- Withdrawal or avoidance behaviours

5. Child Sexual Exploitation (CSE)

Definition: A form of sexual abuse where children are manipulated, coerced, or deceived into sexual activity in exchange for money, gifts, or status.

Relevant Law:

- *Sexual Offences Against Children Act 2017* – Sections 12–15: covers child grooming, sexual exploitation, and child pornography.
- *Anti-Trafficking in Persons and Anti-Smuggling of Migrants Act 2007 (ATIPSOM)* – covers sexual exploitation and trafficking.

Examples:

- Older individuals providing gifts or attention in return for sexual activity
- Trafficking or organised exploitation
- Online grooming leading to in-person abuse

Possible Indicators:

- Unexplained money or possessions
- Relationships with significantly older individuals
- Repeated absences from school or going missing
- Emotional instability or aggression

6. Child Criminal Exploitation (CCE)

Definition: Manipulation of children into criminal activities.

Relevant Law:

- *Child Act 2001* – allows intervention if a child is at risk of exploitation.
- *Penal Code* – covers theft, drug trafficking, gang involvement.
- *Dangerous Drugs Act 1952* – criminalises drug-related activities involving children.

Examples:

- Drug trafficking or couriering (“mule” activity)
- Shoplifting, theft, or robbery
- Online fraud or scams

Possible Indicators:

- Sudden money, expensive possessions, or new devices
- Fearful behaviour towards certain peers or adults
- Carrying items linked to criminal activity
- Unexplained absences or changes in behaviour

7. Domestic Violence and Witnessing Abuse

Definition: Children exposed to or witnessing violence in the home.

Relevant Law:

- *Domestic Violence Act 1994 (Amended 2017)* – recognises exposure of children to domestic violence as emotional abuse.
- *Child Act 2001* – Section 17: protects children in abusive households.

Examples:

- Witnessing physical assaults or threats
- Being used as leverage in parental conflict
- Exposure to emotional or psychological abuse within the home

Possible Indicators:

- Anxiety, hypervigilance, or aggression
- Reluctance to go home
- Disturbed sleep or frequent unexplained illness
- Difficulty concentrating in school

8. Substance Misuse

Definition: Involvement of children in drug or alcohol abuse.

Relevant Law:

- *Dangerous Drugs Act 1952* – prohibits drug possession and trafficking, including by minors.
- *Poisons Act 1952* – regulates harmful substances.
- *Control of Drugs and Cosmetics Regulations 1984* – regulates misuse of pharmaceutical substances.

Examples:

- Experimentation with drugs or alcohol
- Involvement in substance distribution
- Using substances as a coping mechanism

Possible Indicators:

- Sudden mood swings or aggression
- Decline in academic performance
- Smell of substances, paraphernalia possession
- Poor attendance or punctuality

9. Honour-Based Abuse (HBA), Forced Marriage, FGM

Definition: Abuse linked to cultural or familial beliefs in "honour," often involving coercion, control, or violence.

Relevant Law:

- *Law Reform (Marriage and Divorce) Act 1976*, where applicable.
- Relevant Islamic family law enactments and Syariah Court requirements, where applicable.
- *Child Act 2001 (Act 611)*, concerning children requiring care or protection.
- *Penal Code (Act 574),* where conduct involves offences such as assault, unlawful confinement, threats or other criminal harm.

The legal requirements concerning marriage and harmful practices may vary according to the circumstances and applicable law. Any concern involving coercion, injury, exploitation or risk of harm must be referred to the DSL for safeguarding assessment and consideration of external referral.

Examples:

- Pressure to marry without consent
- Physical punishment linked to perceived dishonour
- Female genital cutting or mutilation involving actual or potential harm to a child.

Possible Indicators:

- Extended unexplained absences or sudden travel abroad
- Distress linked to cultural or family pressures
- Reluctance to discuss personal life
- Signs of trauma or injury (in cases of FGM)

Regardless of cultural, religious or family practices, SBIS will assess any concern involving coercion, violence, exploitation, injury or risk of harm to a child as a safeguarding matter. Staff must refer concerns to the DSL and must not contact family members where doing so could increase the risk to the child.

10. Extremism and Radicalisation

Definition: Exposure to ideologies that encourage intolerance, hatred, or violence.

Relevant Law:

- *Penal Code (Act 574)* – relevant terrorism-related offences.
- *Security Offences (Special Measures) Act 2012 (Act 747)* – special procedures relating to specified security offences, where applicable.
- *Communications and Multimedia Act 1998 (Act 588)* – relevant provisions concerning misuse of communications services, where applicable.

Examples:

- Accessing extremist content online
- Expressing extremist views or symbols
- Recruitment attempts by extremist groups

Possible Indicators:

- Sudden isolation from friends
- Use of extremist language or slogans
- Hostility towards certain groups
- Obsession with ideology-related symbols

Safeguarding assessments for extremism and radicalisation must be evidence-based and not discriminate against lawful beliefs.

11. Mental Health and Wellbeing Concerns

Definition: Emotional or psychological difficulties affecting safety, learning, or wellbeing.

Relevant Law:

- *Mental Health Act 2001* – provides framework for treatment and care.
- *Child Act 2001* – recognises neglect of mental and emotional wellbeing as abuse.
- Applicable Malaysian education legislation, regulations and requirements concerning student welfare, where relevant.

Examples:

- Anxiety or depression
- Eating disorders
- Self-harm or suicidal ideation

Possible Indicators:

- Withdrawal from activities and friendships
- Drop in school performance
- Visible signs of self-injury
- Persistent low mood or expressions of hopelessness