



## Safeguarding Policy (Child Protection)

Date reviewed	Reviewer	Next review date
September 2025	Designated Safeguarding Leads	June 2026

### Safeguarding Team

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<b>Safeguarding Helpline</b>	019 212 3362 (Operating Hours: Monday – Friday, 08:00 – 18:00. Please contact Sarah or Gary for any emergencies outside of operating hours for Secondary, and Kris for Primary.)	

#### Notes:

- The terms 'safeguarding' and 'child protection' are often used interchangeably in international schools. At KTJ, we define 'safeguarding' as actions we take and procedures we put in place to provide a safe environment for our students. We define 'child protection' as actions we take when students have been subjected to harm and to protect those students from further harm.
- We use the terms 'student' and 'students' primarily at KTJ and these are interchangeably used with the term 'child' and 'children'.



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## Safeguarding Policy (Child Protection)

### Policy Statement

Kolej Tuanku Ja'afar (KTJ) is committed to ensuring that all students enjoy a safe environment in which they can learn, develop and flourish. We recognise our moral and statutory responsibilities to safeguard and promote the welfare of all students. The policy outlines in detail the School's commitment to our students and staff, and we expect all members of staff to share this commitment.

The School operates a culture of openness, trust and transparency in which the values and expected behaviour set out in the Staff Code of Conduct are consistently followed, monitored and reinforced by all staff. A strong safeguarding system promotes and maintains a positive culture where observations can be identified and spoken about openly. The intention is to support an individual to reflect and take appropriate but necessary steps at an early stage in order to clarify or reestablish boundaries and to restore professional relationships before it becomes more difficult to do so.

Staff are trained to be alert to the [indicators](#) of abuse, neglect and exploitation, and we follow our procedures to ensure that students receive effective support, protection and justice. We consider the welfare of each student to be paramount, and it is our stated intention to be proactive and vigilant in ensuring every student in our community is kept safe from exploitation, abuse and harm. This policy provides the framework for achieving this.

This policy is in alignment with the [CIS Code of Ethics](#). It follows the guidance detailed in the UK Government's Department for Education document, [Keeping Children Safe in Education 2025](#). [The relevant Malaysian laws](#) will always apply and take precedence.

[The United Nations Convention on the Rights of the Child \(UNCRC\)](#) calls for the primacy of a child's best interests in all decisions affecting a child. Furthermore, it highlights the importance of seeking and respecting the views of the child. We endeavour to do so, except where the child's wellbeing or safety is at risk or where the Malaysian laws require us to break this expectation.

The principles and procedures contained in this policy apply to all staff, service providers and volunteers, including non-staff residents on the campus. All who work at KTJ must read and commit to acting in accordance with this policy as a condition of employment or service provider contract at KTJ.

When the word 'staff' is used in this policy, it includes all staff, service providers and volunteers. When the word 'parent' is used in this policy, it includes parents and legal guardians.

### Part One: Protecting Students

- 1.1 Safeguarding and promoting the welfare of students involve protecting them from maltreatment as soon as problems emerge, whether within or outside the home, including online. It also aims to prevent the impairment of their mental and physical health or development, to ensure they grow up in safe and effective care, and to take action to enable them to achieve the best outcomes.
- 1.2 All staff should feel able to raise concerns about poor or unsafe practices and potential failures in the School's safeguarding regime and should know that such concerns will be taken seriously by the School.
- 1.3 All systems and processes should operate with the best interests of the student at heart. The student's wishes and feelings are taken into account when determining what action to take and what services to provide.

### Core Principles

- 1.4 Safeguarding and promoting the welfare of students are everyone's responsibility. All staff have a responsibility to provide a safe environment in which students can make progress and thrive.



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- 1.5 All staff should be aware of procedures within the School which support safeguarding and child protection. These include the contents of this policy, of the Staff Code of Conduct, and of the use of CPOMS products to report concerns, as well as other relevant processes and procedures.
- 1.6 All staff are in a position to identify concerns early, to provide help for students, to promote students' welfare and to prevent concerns from escalating. All staff should be aware of early help indicators of abuse, neglect and exploitation.
- 1.7 All staff take active roles in building trusted and positive relationships with students, as this facilitates communication and provision of support.
- 1.8 All staff should know what to do if students tell them they are being abused, neglected or exploited, and this includes following the referral process. No single practitioner can have a full picture of a student's needs and circumstances, hence reporting concerns allows the Safeguarding Team to construct a better and more informed understanding.
- 1.9 Actions must be taken to protect students who are at risk.

### Supporting Principles

The School will:

- 1.10 Recruit and retain staff of the highest calibre who share the School's safeguarding commitment;
- 1.11 Have a well-trained and visible Safeguarding Team, which is easily accessible to all members of the KTJ community;
- 1.12 Establish and develop student voice through Uplift Ambassadors;
- 1.13 Establish and maintain an environment where students feel secure and are confident to approach any adult to talk, knowing that they will be listened to sensitively;
- 1.14 Develop in students an increased ability to recognise situations that are potentially or actually unsafe at early stages;
- 1.15 Ensure that staff and students develop an awareness of the acceptable use of ICT and of safe online behaviours;
- 1.16 Ensure parents understand the School's safeguarding responsibilities, by making this policy available to them;
- 1.17 Encourage staff to maintain an attitude of "it could happen here";
- 1.18 Provide all staff with the necessary information and training to enable them to meet their safeguarding responsibilities;
- 1.19 Provide all volunteers, unaccompanied vendors/contractors and non-staff residents with training which makes expectations clear;
- 1.20 Keep safeguarding as a "live" matter of discussion, so that staff may make any enquiries about the School's procedures;
- 1.21 Provide advice on situations where staff may be vulnerable and provide guidance on safer working practices, so that the risk of misplaced or malicious allegations of improper behaviour is reduced;
- 1.22 Provide a safe environment for staff to raise low level concerns;
- 1.23 Ensure that the leadership team and relevant staff are aware of filtering and monitoring provisions and can effectively manage them, including the escalation of concerns when identified.

All staff should be aware:

- 1.24 That abuse, neglect, exploitation, and safeguarding issues are rarely stand-alone events;
- 1.25 That safeguarding incidents can be associated with factors outside the School and/or can occur between students outside of these environments;
- 1.26 Extra-familial and intra-familial abuse or harm affects students emotionally, psychologically and in other ways;
- 1.27 Of safeguarding issues which may affect students, such as drug-taking and alcohol abuse;
- 1.28 That students can abuse other students (student-on-student abuse);
- 1.29 That mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation;
- 1.30 That unexplainable and/or persistent absences from education can be a potential indicator of various safeguarding issues, including abuse, neglect or exploitation;



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- 1.31 That a student experiencing multiple suspensions or being at risk of being permanently excluded from school is a sign of an early help indicator;
- 1.32 Students facing additional barriers (e.g. disabilities or special educational needs, family situations, language barriers, identity conflicts, etc.) can be more vulnerable.

### Part Two: Roles and Responsibilities of Safeguarding Key Personnel

#### The Nominated Safeguarding Trustee is responsible for:

- 2.1 Approving modifications to safeguarding arrangements in response to evolving regulations or recommended best practices; and
- 2.2 Managing concerns or allegations about the Principal or anyone related to them.

#### The Principal is responsible for:

- 2.3 Assessing the processes and the effectiveness with which safeguarding responsibilities have been carried out;
- 2.4 Ensuring that any shortcomings or vulnerabilities in safeguarding measures are promptly addressed;
- 2.5 Consistently engaging with the Designated Safeguarding Leads;
- 2.6 Offering support to the Designated Safeguarding Leads to ensure that safeguarding policies and procedures remain current; and
- 2.7 Managing concerns or allegations about adults who work with our students. This includes, but is not limited to, staff, volunteers and external providers.

#### The Designated Safeguarding Lead (DSL) is responsible for:

- 2.8 Assuming primary accountability for ensuring the safety and protection of children, encompassing online security and the comprehension of existing filtering and monitoring mechanisms and, additionally, providing assistance to all members of staff in addressing any issues related to child welfare and protection that may emerge at the School;
- 2.9 Overseeing case management and referrals, while serving as the primary point of contact and collaborating with others to safeguard and protect children;
- 2.10 Ensuring that records of all concerns, discussions and decisions, including the rationale behind those decisions, are well maintained;
- 2.11 Overseeing the School's safeguarding and child protection procedures;
- 2.12 Facilitating regular opportunities for staff to share welfare concerns with clear monitoring and response procedures;
- 2.13 Conducting training, managing safeguarding cases and referrals, maintaining confidential files, collaborating on recruitment practices, and staying updated on best practices
- 2.14 Offering guidance and assistance to fellow members of staff regarding topics related to child wellbeing, child safety and the protection of children;
- 2.15 Participating in strategic dialogues and inter-agency gatherings, and facilitating the involvement of other members of staff in these activities;
- 2.16 Advocating for and ensuring the wellbeing of students within the School; and
- 2.17 Managing the safeguarding team and case managers.

#### The Deputy Designated Safeguarding Lead (DDSL) is responsible for:

- 2.18 Assuming the primary role of the DSL in case management and child advocacy during their absence; and
- 2.19 Participating in the School's safeguarding strategic planning.

#### The Safeguarding Team is responsible for:

- 2.20 Assisting in providing safeguarding training to members of staff in order to improve awareness and understanding of procedures;
- 2.21 Contributing to the development and review of policies in order to keep them effective and up to date; and
- 2.22 Supporting reporting, monitoring safeguarding measures, offering guidance, and promoting a safeguarding culture within the School.



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### The Case Manager is responsible for:

- 2.23 Handling individual safeguarding cases and working collaboratively with DSL and/or DDSL, and external agencies to support at-risk students;
- 2.24 Recording all concerns, discussions, and decisions, including the rationale behind those decisions; and
- 2.25 Serving as the primary point of contact for safeguarding-related matters within their respective boarding houses.

### Part Three: Concerns, Disclosures and Observations

#### If you are concerned about a student's welfare

- 3.1 There will be occasions when staff may notice an emerging concern about a student. Physical signs, changes in behaviour or issues in their schoolwork might be observed. For instance, a student might express confusion or distress through their writing or artwork. While this may not initially indicate a child protection issue, it should still be documented on CPOMS by the members of staff or reported to the Safeguarding Team in person.
- 3.2 If a staff member believes a student is at immediate risk of harm and deems the activation of a child protection plan necessary, they should promptly contact the Helpline at 019 212 3362 (Operating hours: Monday-Friday; 8.00am - 6.00pm), or Simonetta at 06 850 5560 for Primary School-related concerns. If the Helpline cannot be reached, or if an immediate concern arises outside of operating hours, staff members should contact Sarah or Gary via Microsoft Teams for Secondary, and Kris for Primary.
- 3.3 If a member of staff believes that the immediate risk of harm is caused by the Safeguarding Lead(s), or someone related to them, they should promptly contact the Principal at +6068505500 (refer to clause 3.8 - 3.11).
- 3.4 Staff should report the details of these concerns, including dates, the nature of the concern, the individuals involved, where the concern was noted or reported on CPOMS StudentSafe within 24 hours, even when they have contacted the Safeguarding Lead(s) by phone.
- 3.5 The DSL(s) will discuss any child protection concerns related to individual students with the Head of Primary or Head of Secondary, as appropriate. A decision will be made on how to address the issue, and the course of action may involve engaging external bodies, consulting the relevant embassy in the case of expatriates, and/or contacting the Police. The rationale behind each decision made will be documented on CPOMS StudentSafe.

#### If a student discloses to you

- 3.6 It takes a lot of courage for a student to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen, if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.
- 3.7 If a student talks to a member of staff about any risks to their safety or wellbeing, the member of staff must, at the appropriate time, let the student know that in order to help them, they must pass the information on to others, such as the DSL(s). The point at which they tell the student this is a matter for professional judgement but it is best done at the earliest opportunity. During their conversations with the student the member of staff must:
  - 3.7.1 Allow the student to speak freely;
  - 3.7.2 Remain calm and not overreact;
  - 3.7.3 Be mindful of the tone of speech/voice - you may consider softer voice and slower pace;
  - 3.7.4 Give reassuring nods or words of comfort and avoid dismissing the student's claims as false or malicious, e.g. "You are doing the right thing in talking to me";
  - 3.7.5 Not be afraid of silences;
  - 3.7.6 Use "mirror questions" (questions which are non-directive in nature, which mean they are intended to encourage another person to continue to add detail to what they have said without influencing the person to go in a specific direction in terms of content), e.g. Student: "My nanny hits me." Adult: "Your nanny hits you?";
  - 3.7.7 Avoid investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the student's mother think about it;





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- 3.7.8 At an appropriate time, tell the student that in order to help them, you must pass the information on and explain to whom and why;
- 3.7.9 Not offer any physical touch as comfort, unless it is absolutely necessary;
- 3.7.10 Avoid admonishing the student for not disclosing earlier;
- 3.7.11 Tell the student what will happen next;
- 3.7.12 Immediately after receiving the disclosure, report the disclosure via CPOMS StudentSafe, or inform the DSL(s) or the Principal immediately if there is immediate risk of harm;
- 3.7.13 Do not discuss this disclosure with anyone else and treat it with the utmost confidentiality.

### If you have concerns about a colleague

- 3.8 If staff have safeguarding concerns about another member of staff who may pose a risk of harm to students, this must be reported on CPOMS StaffSafe (refer to Staff Concerns Reporting Protocol), or directly to the Principal if it involves a potential immediate risk of harm. The Principal will manage the incident personally or assign the Designated Safeguarding Lead/Senior Leadership Team to address it in accordance with the School's Staff Code of Conduct.
- 3.9 If the staff member in question cannot be found on CPOMS StaffSafe, please report the concern directly to the Principal.
- 3.10 The course of action taken could involve external bodies, the relevant embassy, in respect of expatriates, and/or the Police. If expatriate members of staff ceases to be in the service of the School (dismissed or resigned) because they are deemed unsuitable to work with students, the School will consider whether to make a report of this to the relevant authority in the home country (e.g. National Crime Agency in the UK, a country's relevant teaching authority).
- 3.11 Where there are concerns or allegations about the Principal or anyone related to them, this should be referred to the Chair of Trustees directly. YAM Tunku Naquiyuddin can be reached via email at [cslim@antah.com.my](mailto:cslim@antah.com.my). A decision will then be taken at that level on who else needs to have the information.
- 3.12 At times, a member of staff may be the first to recognise that something is wrong but might not feel able to express concerns due to embarrassment or fearing it would be seen as an act of disloyalty to colleagues. Despite these feelings, it is mandatory to report it immediately to avoid putting a student unnecessarily at risk, particularly as it is often the most vulnerable students who are targeted.

### If you have concerns about an organisation or an individual using school premises

- 3.13 The School may encounter allegations pertaining to incidents that occurred while an individual or organisation utilised our premises to conduct activities involving children. These activities may encompass other schools, community groups, sports associations, or service providers offering extracurricular programs.
- 3.14 In keeping with the School's steadfast commitment to safeguarding, it is the school community's responsibility to faithfully follow the established safeguarding policies and procedures (refer to clause 3.1 - 3.12) when such situations arise, just as the School would with any other safeguarding concern.

### Low-Level Concerns About Adult

- 3.14 A [low-level concern](#) about adult encompasses any observation regarding a member of staff, no matter how small, even if it only causes a sense of unease or a 'nagging doubt'.
- 3.15 A member of staff who may have acted in a way inconsistent with the School's Staff Code of Conduct but does not meet an allegation threshold or is otherwise not serious enough to warrant a referral, is also considered a low-level concern.
- 3.16 Low-level concerns or behaviours may range from inadvertent or thoughtless actions to those that could potentially facilitate abusive behaviour over time.
- 3.17 It is important to acknowledge that sometimes an organisational setting either inadvertently facilitates or fails to prevent developing safeguarding concerns or incidents. Examples of this include noticing patterns of rule breaking, erosion of boundaries, the use of trust and authority inappropriately, or excessively meeting the needs of a student.
- 3.18 Early identification of concerning behaviour within the community is crucial for minimising abuse risks and maintaining clarity on professional boundaries, emphasising the need for prompt and appropriate management of observations related to staff and adults interacting with students in effective safeguarding.
- 3.19 Members of staff should consistently reflect on their own actions, considering how their interactions with students may be perceived based on factors such as gender, culture and personal circumstances, ensuring





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a culture of accountability and the fostering of a positive and respectful atmosphere within the school community.

- 3.20 If the member of staff believes they were involved in a situation which could be misinterpreted or might appear compromising to others, they should report themselves on CPOMS StaffSafe.
- 3.21 All low-level concerns about other adults should be reported on CPOMS StaffSafe promptly (refer to clause 3.8-3.12).
- 3.22 Students and members of staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral. If necessary, students and members of staff can consult the Principal on a "no-name" basis. In such situations, the Principal will make a decision on whether the name of the adult must be revealed.
- 3.23 Once students or members of staff share what they believe to be a low-level concern, a determination will be made by the Principal on what action, if any, is required. A responsive, sensitive and proportionate handling of such concerns when they are raised will be the approach taken.
- 3.24 Low-level concerns relating to the Principal, or anyone related to them, must be referred in person to the Designated Safeguarding Lead (Whole School), who will be responsible for monitoring any emerging trends or patterns. Where appropriate, the advice of the Nominated Safeguarding Trustee shall be sought.

### Follow-up Actions

- 3.25 If a member of staff is dissatisfied with the subsequent actions for the following reasons, they should raise the matter with the Principal, or where the Principal is implicated, with the Chairman of Trustees:
  - 3.25.1 Measures taken for a child protection concern about a student are not adequate;
  - 3.25.2 Measures taken for a safeguarding concern about a staff member are not adequate; and
  - 3.25.3 The School's safeguarding systems and procedures are failing.
  - 3.25.4 The School's Whistleblowing Policy details the steps to take.

### Part Four: Confidentiality and Information Sharing

- 4.1 The Case Managers maintain records of student-related concerns, securely managed by the DSLs, separate from the student's general file. Records concerning members of staff are securely managed by the Principal.
- 4.2 Relevant information will be shared with respective members of staff to ensure comprehensive support for students of concern, particularly those at immediate risk of harm. In circumstances where the student's identity does not need to be known, the information will be shared anonymously.
- 4.3 All staff should understand that child protection issues require a high level of confidentiality, not only out of respect for the students and/or members of staff involved but also to prevent the release of information that could compromise evidence and potentially harm the reputation or privacy of those involved.
- 4.4 When a student with a record of child protection concerns leaves the School, the file will only be transferred to the new school upon request from the DSL of the next educational institution. This applies to students under 18 years old and to those 18 years or older who are deemed to be still at risk.
- 4.5 When a new student joins our school in any year group, the DSL(s) will request the student's current school (or previous, if the student is not presently in school) to share any child protection concerns as part of the admissions process.
- 4.6 At the end of every academic year, the Safeguarding Leads will meet to discuss child protection information on students moving from KTJ Primary to KTJ Secondary.

### Part Five: The School and Changes to Family Circumstances

- 5.1 Students' lives can be disrupted by major changes in their family, such as the death of a close family member or friend, or separation or divorce of their parents. Some students' wellbeing may be affected whilst they adjust to such circumstances. A student's teachers and other key staff who have been made aware of the change in family circumstances must be sensitive to the student's situation and support them as best they can. We ask that parents advise the School so that we can offer the student additional support as required.
- 5.2 In a small number of cases, one or both parents may approach the School with concerns over the rights of the other parent to access the site and/or information on their child, and they may wish to restrict these rights. Unless there is legal documentation to support this, the School is unable to prevent a parent from accessing the school site or accessing information held by the School on their child as per the normal systems in place.



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for parental access.

- 5.3 This legal documentation needs to make clear that the one parent is the sole legal custodian for the child and/or that there are specific instructions in place regarding the child. In cases where the legal documentation is not in English, the parent is responsible for providing a certified English translation.
- 5.4 As students turn 18, they gain legal autonomy and privacy rights. It is their prerogative to request the school withhold the release of any school-related information or documents to any party and to deny access to the school site to anyone, including their parents. However, such requests will be considered for safeguarding and protection reasons only, and there is a possibility that the involvement of local authorities may be necessary.
- 5.5 An exception to clauses 5.2-5.4 occurs when there are circumstances, such as unsatisfactory behaviour exhibited by the parent during a visit. In such cases, the School reserves the right to restrict this individual from accessing the school site.

### Student-Specific Instructions

- 5.6 In some cases, the School's Security Team will need to be informed of changes to parental access to the site. For example, if a parent has sole custody and raises a concern that the other parent may attempt to enter the site to access the child. In other cases, a parent may be concerned that someone other than a parent may attempt to gain access to their child through the School.
- 5.7 In these cases, a Student-Specific Instruction will be created by the DSL(s) and sent to the Head of Facilities Management. This memo will be in English and Bahasa Malaysia and, wherever possible, include photographs of the student and adult(s) forming the subject of the notice.

### Part Six: Safer Working Practice

- 6.1 Adults working with students have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of students. It is therefore expected that staff will adopt high standards of personal conduct in order to maintain the trust and respect of those with whom they work and the school community in general.
- 6.2 Members of staff must recognise that, by the very nature of their position, they are in a position of trust. The relationship between an adult and a student, whilst mutually respectful, is not a relationship of equals.
- 6.3 Adults have a responsibility to ensure that the unequal balance of power is not used for personal advantage or gratification.
- 6.4 Members of staff are responsible for their own actions and behaviour and must understand the need to maintain appropriate boundaries in their contact with students.
- 6.5 Members of staff should avoid any contact with students which would lead any reasonable person to question their motivation and intentions.
- 6.6 Members of staff should work and be seen to work, in an open and transparent way.
- 6.7 Members of staff should continuously monitor and review their working practices to ensure they follow the guidance set out in this document.

### Blinds or curtains

- 6.8 Most of the blinds and curtains across the School have been removed from classrooms and offices where there is no reason for them to be there.
- 6.9 Where they are necessary, e.g. science classrooms, blinds should only be closed for specific purposes, such as where low light is needed. In this instance, the blinds should only be used for the specific time required and when there is more than one student in the classroom.
- 6.10 There should never be a situation where a single student is in a room with a member of staff and the blinds are closed, except for lockdown procedures.
- 6.11 Blinds can also be used when there are experiments being set up by staff prior to an examination, when students are not allowed to see the equipment being prepared before the examination. In this case, there should only be members of staff in the classroom at this time and the blinds are to be opened once the students taking the examination have entered the room.



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- 6.12 In the interest of privacy for members of staff, where this is necessary, blinds can be lowered in offices equipped with these but a note should be placed on the door explaining why this room is out of bounds. For example, 'meeting in progress, do not disturb', would be a suitable explanation.
- 6.13 The above applies to anywhere across the school site where students have access, with the exception of the Counsellor's and Safeguarding Offices.

### Communication with students

- 6.14 Any contact with students using electronic media should be for professional reasons only, such as guidance with prep and information sharing.
- 6.15 All communication with students should be limited to professional matters and take place, as far as possible, during the school day operating times (7.00am to 6.00pm). The exception to this may be during prep time (7.45pm to 10.00pm), and for operational communications with students at any time. However, a consideration should be had regarding the students' and the staff's wellbeing, as to whether this is an acceptable time to be communicating with students.
- 6.16 The sharing of images should be limited and professional at all times, e.g. a screenshot of a piece of written prep would be acceptable.
- 6.17 Members of staff must use school-assigned communication channels only, e.g. Microsoft Teams. Staff must not communicate via communication channels which are not assigned by the School, e.g. personal email addresses or WhatsApp.
- 6.18 Members of staff must not give to or obtain from students personal phone numbers, except for very specific reasons which have been made clear to the DSL.
- 6.19 Members of staff are expected to adopt appropriate privacy settings on their personal online profiles, including platforms like Facebook and Instagram, ensuring settings align with their comfort level and recognise the professional nature of their relationship with students and their families. These privacy settings should consider both the School's interests and compliance with the terms and conditions of employment.
- 6.20 Members of staff must not contact their children's friends, who are also students at KTJ, for personal reasons. In case of an emergency during privately-arranged outings with friends or family, communication should take place between the adults.

### Communication with Former Students

- 6.21 Members of staff can be online 'friends' with former students who are 21 years of age or older, but this is not encouraged. If the members of staff need to contact former students for professional reasons, this is best done through school-approved communication channels, such as those used for communication with current students.

### Communication between Former Staff and Existing Students

- 6.22 Former staff members must not give personal contact details to, or obtain them from, existing students. All professional communication should be conducted through the School.

### Gifts and Favouritism

- 6.23 The School's Anti-Corruption Policy covers gifts extensively.
- 6.24 Every student should be treated equally and deserves the same opportunities. When selecting students for specific activities or privileges, caution should be exercised to prevent perceptions of or actual favouritism.
- 6.25 Selection methods should always be transparent and capable of holding up to scrutiny. Similar care should be taken when excluding students from an activity or privilege.

### Infatuations

- 6.26 Where there are indicators that a student may have developed an infatuation for a member of staff, they should bring it to the attention of the DSL as soon as possible so that appropriate action can be taken to limit any distress or embarrassment to the student.
- 6.27 Infatuations may not be limited to members of the opposite gender.
- 6.28 Members of staff should be aware that infatuations carry a high risk of words or actions being misconstrued and extra care should be taken to ensure that their behaviour is above reproach.



## Safeguarding Policy (Child Protection)

### Intimate Care

**6.29** Refer to the School's Restraint and Safe Touching Policy.

### One-to-One Meetings

- 6.30 In order to ensure students are fully supported both academically and pastorally, one-to-one meetings will sometimes need to be scheduled.
- 6.31 Some meetings will be pre-arranged and some *ad hoc*, where a student will go and see a teacher to seek help. However, staff working in one-to-one situations with a student are placed in more vulnerable situations and must take steps to ensure the meetings are conducted professionally at all times. The following are general guidelines:
- 6.31.1 Meetings should be held in an environment where there are other members of staff in close proximity in the same building.
  - 6.31.2 Meetings should always be held in a room where the student and members of staff can easily be seen from the corridor.
  - 6.31.3 When conducting the meeting, staff should avoid sitting or standing in unnecessarily close proximity to the student. Physical contact must be avoided.
  - 6.31.4 Members of staff must report any concerns about the behaviour of a student in a one-to-one meeting to the DSL.
  - 6.31.5 If a meeting is scheduled outside of the normal school day, the members of staff should include [safeguarding@ktj.edu.my](mailto:safeguarding@ktj.edu.my) in the calendar invitation, ensuring that the meeting's purpose is clearly communicated to the involved student.
  - 6.31.6 Members of staff must always invite [safeguarding@ktj.edu.my](mailto:safeguarding@ktj.edu.my) to their one-to-one online meetings.
  - 6.31.7 In boarding houses, meetings should be held in open spaces, corridors or office spaces.

### Online Competitions and Meetings

- 6.32 Separate and detailed guidelines are available for staff on the use of online provisions and must be followed. These are accessible on the Safeguarding Shared Drive. Staff who need further assistance should consult the Safeguarding Team.
- 6.33 Only school-approved online meeting platforms should be used and at the time of the publishing this policy, these are Google Meet and Microsoft Teams.
- 6.34 Members of staff organising online events should request the provider to send a copy of their safeguarding and data protection policies. In the event that the provider is unable to provide these policies, the event organiser should share a copy of the School's policies and provide a briefing accordingly.

### Photography, Videography and Voice Recordings

- 6.35 Official photography, videography or voice recordings should be carried out by the Marketing Manager and others designated by the Marketing Manager, using approved devices.
- 6.36 Primary School teachers have school-issued devices, which they are permitted to use.
- 6.37 Photographs, videos and recordings can be shared, as appropriate, through social media and internal shared drives.
- 6.38 Members of staff should not need to take any photographs, videos or voice recordings of students using their personal electronic devices.
- 6.39 Personal electronic devices, in particular devices which provide additional functionality, such as drones, action cameras or high definition/4K-enabled devices, may be allowed in special circumstances such as school trips or house events.
- 6.40 These devices should only be used with prior permission. Requests should be sent to [safeguarding@ktj.edu.my](mailto:safeguarding@ktj.edu.my) in advance, with specific reasons for use of such devices.
- 6.41 Where advance requests have not been made and immediate use of personal devices is necessary, this must be declared via email to [safeguarding@ktj.edu.my](mailto:safeguarding@ktj.edu.my) as soon as is reasonably possible.
- 6.42 Any produced materials must be transferred to the School's SharePoint and deleted from the personal device within 72 hours of the end of the event.
- 6.43 In certain circumstances, such as sports days or swimming galas, it may be necessary for staff engaged in events, in particular those staff stationed at finish lines, to record swimmers or runners using a school device.



## Safeguarding Policy (Child Protection)

Such recording should be used solely for the purpose of identifying winners or disqualifications. All such recordings must be deleted after the event by the event organiser.

### 6.44 Media files publication protocols:

- 6.44.1 Staff must remain vigilant when taking or sharing photographs or videos of students to ensure that both attire and context are appropriate.
- 6.44.2 For posed photographs outside of swimming or sporting activities, students must be dressed in a t-shirt and shorts. Images of students in swimsuits outside of the pool (e.g., podium shots) must not be shared or published.
- 6.44.3 Photographs of students during active participation in sports (e.g., swimming, diving) may be taken; however, staff must exercise discretion to ensure that only respectful and appropriate images are selected for sharing.
- 6.44.4 Before the publication of any photograph or video, staff are required to check that the student has photo consent recorded in iSAMS. Consent is not required where students appear incidentally in the background of a crowd and are not the focus of the image.
- 6.44.5 Media files may only be shared or published on school-approved platforms and in school-approved documents.
- 6.44.6 No images of students should be published with identifying data.
- 6.44.7 Where there is any uncertainty regarding appropriateness, consent, or publication, staff must promptly consult the DSL(s).

### 6.45 Many members of staff have children at KTJ, whom they may wish to photograph during events. Particular care should be taken to avoid recording digital images of other students unnecessarily without consent. Similarly, the sharing or publishing of such images should only be undertaken after careful consideration of possible impacts.

## Physical Contact or Restraint

- 6.46 This is extensively covered in the School's Restraint and Safe Touching Policy.

## Showers, Changing Rooms and Restrooms

- 6.47 Students are entitled to respect and privacy when showering, changing their clothing or using the toilet.
- 6.48 However, a suitable level of supervision needs to be maintained to satisfy health and safety considerations, to monitor behaviour and to ensure that the students are protected. This level of supervision should be appropriate to the age and needs of the students.
- 6.49 Members of staff must be vigilant about their own behaviour and announce their intention before entering a bathroom or changing room.
- 6.50 Members of staff do not shower or change in the same place as students. Members of staff must restrict their use of bathrooms to adult bathrooms only.
- 6.51 Members of staff must not give permission for students to use the adult bathrooms at any time.

## Students in Distress

- 6.52 There will be occasions when a distressed student needs comfort and reassurance and this may include age-appropriate physical contact.
- 6.53 Members of staff should proceed cautiously in offering support in this way and use their professional judgement carefully. Refer to the Restraint and Safe Touching Policy for more specific guidance.

## Students Visiting Staff Accommodation

- 6.54 Students who are friends of the members of staff's children may visit staff accommodation within the school campus and it is the members of staff's responsibility to ensure what the visiting student sees and experiences within their accommodation aligns with the safeguarding expectations of the school.
- 6.55 Visiting procedures for boarding students who are friends of the members of staff's children:
  - 6.55.1 Hosting members of staff must obtain parental consent and declare the day visiting arrangement to [safeguarding@ktj.edu.my](mailto:safeguarding@ktj.edu.my) during term-time.
  - 6.55.2 If a boarding student wishes to stay overnight in staff accommodation during term-time, members of staff must email [safeguarding@ktj.edu.my](mailto:safeguarding@ktj.edu.my) with details of the arrangement after discussing and obtaining consent from the other student's parent(s).





## Safeguarding Policy (Child Protection)

- 6.55.3 Hosting members of staff must provide proof of an ORAH pass for their day and overnight student visitors in their declaration email to the safeguarding team.
- 6.55.4 Exceptions to this procedure include:
  - 6.55.4.1 Private visiting arrangements can be made between the parent(s) and members of staff during the end of term break when all boarding houses are closed.
  - 6.55.4.2 Private visiting arrangements can be made between parents when both students are children of members of staff.
- 6.56 Visiting procedures for day students who are friends of the members of staff's children:
  - 6.56.1 Hosting members of staff must obtain parental consent and declare the day and/or overnight visiting arrangement to [safeguarding@ktj.edu.my](mailto:safeguarding@ktj.edu.my) during term-time.
  - 6.56.2 Exceptions to this procedure include:
    - 6.56.2.1 Private visiting arrangements can be made between the parent(s) and members of staff during non-school days (e.g. Sundays, exeat, mid-term break, and term break.)
    - 6.56.2.2 Private visiting arrangements can be made between parents when both students are children of members of staff.
- 6.57 Student visits to staff accommodation should occur occasionally. However, if hosting members of staff anticipate a regular student visitor during term-time, the following procedures should be followed:
  - 6.57.1 Hosting members of staff are required to email [safeguarding@ktj.edu.my](mailto:safeguarding@ktj.edu.my), indicating the purpose of the regular visitation and the frequency of such visits, along with written consent from the parents of the visiting student.
  - 6.57.2 A discussion will then be arranged between the hosting members of staff and the DSL(s).
  - 6.57.3 An ORAH pass must be requested for each visit if the student visitor is a boarding student.
  - 6.57.4 Termly reviews are mandatory for regular student visitors to ensure alignment with the latest safeguarding requirements and to revisit and reflect on the necessity of such visits.
- 6.58 All declaration emails should be sent to [safeguarding@ktj.edu.my](mailto:safeguarding@ktj.edu.my) prior to the visit.
- 6.59 During term-time, students are discouraged from visiting staff accommodation between the school's operating hours of 7.00am and 6.00pm. Hosting members of staff should promptly consult the DSL(s) if any arrangements need to be made within these hours.
- 6.60 When private arrangements are made, the hosting members of staff are fully responsible for the student visitor under their supervision.
- 6.61 Members of staff who live off-campus are encouraged to follow the same procedures.

### Transportation

- 6.62 Members of staff are strictly prohibited from using their personal vehicles to transport students both on and off campus.
- 6.63 This measure is in place to prioritise the safety and wellbeing of students, ensuring a standardised and secure mode of transportation.
- 6.64 Exceptions to this procedure include:
  - 6.64.1 During a medical emergency, students should occupy the back seat of the car, and members of staff are required to promptly self-report the use of their personal vehicles.
  - 6.64.2 Members of staff must obtain parental consent and declare their travel to [safeguarding@ktj.edu.my](mailto:safeguarding@ktj.edu.my) if boarding students who are friends of their children are to travel in their personal vehicle during term-time.
  - 6.64.3 Private transportation arrangements can be made between parent(s) and members of staff when the day students who are friends of the members of staff's children are to travel in their personal vehicle outside school hours.
  - 6.64.4 Private transportation arrangements can be made between parents when both students are children of members of staff.

### Hosting a Visitor or Event on Campus

- 6.65 Staff members hosting a visitor or event on campus are required to strictly adhere to the School's Day Visitor Policy, Overnight Visitor Policy and Residents Policy, as applicable.
- 6.66 A copy of the [Visitor Safeguarding Code of Conduct](#) should be shared with visitors prior to their arrival, if appropriate, and a safeguarding housekeeping briefing or reminder can be provided upon their arrival.



## Safeguarding Policy (Child Protection)

### Part Seven: School Trips and Educational Visits

#### Supervision and External Providers

- 7.1 Adults supervising school trips are required to strictly adhere to the School's Safeguarding Policy and School Trips & Educational Visits Policy, ensuring the best practices for student safety and wellbeing.
- 7.2 All supervising adults must have completed relevant safeguarding training enabling them to effectively address any arising issues.
- 7.3 External providers engaged for school activities must undergo appropriate vetting. The School mandates that providers working unsupervised with our students have conducted thorough police checks for their staff. The responsibility for this vetting process lies with the 'Head of Outdoor Education' for residential trips and the designated group leader for local trips.
- 7.4 Supervising staff are accountable for ensuring the adequate separation of genders and maintaining appropriate boundaries between students and staff in accommodation facilities, including the use of bathrooms and toilets.
- 7.5 Prior to commencing activities, trip leaders are responsible for briefing external providers on the School's safeguarding expectations. This includes guidelines regarding photography, student contact, and other relevant protocols, empowering them to monitor compliance throughout the trip.

#### Pre-Trip Student Review and Intervention Plans

- 7.6 Trip organisers are required to share the list of participating students with the DSL(s) before any field, residential and overseas trip. This requirement does not extend to sports fixtures due to the typically shorter duration and local nature of such events. This step facilitates the exchange of crucial information necessary to mitigate potential risks.
- 7.7 The DSL(s), in collaboration with the Head of Counselling, will review the student list. If a student is at moderate to high potential risk of harm, an intervention plan will be devised aimed at ensuring their safety and wellbeing.
- 7.8 Following the review and intervention plan development, the DSL(s) and/or the Head of Counselling will arrange a meeting with the trip leader and/or supervising staff. This meeting will involve discussing and implementing the intervention plan to address any identified concerns proactively.
- 7.9 Furthermore, it is essential for all staff supervising trips to maintain open communication and actively discuss any safeguarding concerns with their colleagues throughout the trip's duration.
- 7.10 In the event of any safeguarding issue, it should be reported immediately— to the DSL(s) if it concerns students, and to the Principal if it concerns members of staff. The incident should then be logged on CPOMS StudentSafe or CPOMS StaffSafe respectively.

#### Mandatory Searches

- 7.11 The School's Conducting a Search Policy should be strictly adhered to.
- 7.12 If a situation arises necessitating a mandatory search during the trip, it is imperative that two members of staff, ideally of the same gender as the students, are present.
- 7.13 Only supervising staff of the same gender as the students are permitted to enter the student's accommodation during the search.
- 7.14 In circumstances where only one supervising member of staff is available, the trip leader should seek assistance from the organiser to assign a member of their organising team of the same gender to join the search as a witness.

#### Parental Accompaniment and Interaction

- 7.15 In instances where a parent needs to accompany their child during a trip, prior approval from the School is mandatory.
- 7.16 The accompanying parent must lodge in a separate hotel or, at the very least, a different floor from the students.
- 7.17 Interaction between the parent and other students is strictly prohibited unless explicit permission has been granted by the trip leader. The parent should focus solely on interacting with their own child throughout the trip.





## Safeguarding Policy (Child Protection)

### Part Eight: Student-on-Student Abuse

- 8.1 All members of staff should be aware that children are capable of mistreating other children, also known as student-on-student abuse, which can occur within school grounds, outside of educational settings, and online.
- 8.2 The absence of reports within the school does not necessarily signify the absence of abuse; rather, it may indicate underreporting. It is imperative to address instances of student-on-student abuse promptly and with sensitivity.
- 8.3 It is important to recognise and address abusive behaviours among children, as downplaying them, such as dismissing sexual harassment as harmless banter or part of growing up, can foster a culture of acceptance towards misconduct. This normalisation may deter children from reporting abuse, creating an unsafe environment.
- 8.4 Student-on-student abuse can involve various types of harmful behaviour, including but not limited to:
  - 8.4.1 Bullying, which encompasses cyberbullying, prejudice-based, and discriminatory bullying;
  - 8.4.2 Abuse within intimate personal relationships among children, sometimes referred to as 'teenage relationship abuse';
  - 8.4.3 Physical abuse, such as hitting, kicking, shaking, biting, hair pulling, or any action causing physical harm, potentially facilitated or encouraged by online means;
  - 8.4.4 Sexual violence, including rape, assault by penetration, and sexual assault, which may be facilitated or encouraged online;
  - 8.4.5 Sexual harassment, which can take the form of sexual comments, remarks, jokes, or online harassment, either standalone or as part of a broader pattern of abuse;
  - 8.4.6 Coercing someone into sexual activity without their consent, such as by forcing them to strip, touch themselves sexually, or engage in sexual activity with a third party;
  - 8.4.7 Sharing of nude or semi-nude images or videos, consensually or non-consensually, also known as sexting or youth-produced sexual imagery;
  - 8.4.8 Upskirting, involving taking unauthorised pictures under a person's clothing with the intention of obtaining sexual gratification or causing humiliation, distress, or alarm to the victim; and
  - 8.4.9 Initiation or hazing rituals, which may include activities of harassment, abuse, or humiliation, sometimes involving online elements, as a way of inducting a person into a group.
- 8.5 In order to ensure accurate information gathering, staff who uncover instances of student-on-student abuse should promptly document them on CPOMS StudentSafe or report them directly to the DSL(s) in person. Refer to clause 3.1 for guidance.
- 8.6 It is vital to consider the language used during investigations and its potential effects on all students and their parents. It is essential to avoid language that perpetuates a victim-blaming culture and leads to labelling students.
- 8.7 Members of staff must not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.
- 8.8 As complete an assessment of an incident between students should be undertaken, including:
  - 8.8.1 Chronological and developmental ages of everyone involved;
  - 8.8.2 Difference in their power or authority in relation to age, race, gender, physical, disability, emotional or intellectual vulnerability;
  - 8.8.3 Alleged physical and verbal aspects of the behaviour and incident;
  - 8.8.4 Whether the behaviour involved physical aggression or intimidation, threatening behaviour or bribery, inappropriate sexual knowledge or motivation;
  - 8.8.5 The effect on the student on the receiving end;
  - 8.8.6 Any attempts to ensure the behaviour and incident is kept a secret;
  - 8.8.7 The student's motivation or reason for the behaviour, if they admit that it occurred;
  - 8.8.8 Whether this was a one-off incident, repeated or longer in duration.
- 8.9 Intervention strategies are in place to provide continuous support and guidance for students affected by student-on-student abuse. This should be read along with the School's Anti-Bullying Policy.
  - 8.9.1 A risk assessment will be conducted by the DSL(s) as part of the process of (i) identifying and strengthening protective factors, (ii) assessing, addressing, and reducing risks, and (iii) considering methods to support students and other members of the school community;
    - 9.1.1. The NSPCC's safety plan, also referred to as the risk assessment [template](#) will be utilised;



## Safeguarding Policy (Child Protection)

- 9.1.2. Consideration might be required to conduct separate but coordinated risk assessments for the alleged perpetrator(s), the victim(s), and any other student(s) who might be affected by the alleged abusive or violent behaviour;
- 9.1.3. If a risk assessment is deemed unsuitable in any instance, the school will still ensure the protection and assistance of the alleged perpetrator(s), victim(s), and any other student(s) affected by the reported behaviour, while maintaining ongoing monitoring. Should the risks escalate, reconsideration for a risk assessment should be contemplated.
- 9.1.4. Risk assessments ought to undergo regular reviews, or prompted by another alleged incident or significant change in circumstances. These reviews should be conducted considering the ongoing needs of the student(s) involved, ensuring tangible progress that serves their best interests.
- 8.9.2 Emotional support will be offered to those affected by the School's counselling team; and
- 8.9.3 Restorative approaches will be considered based on the nature and seriousness of the concern(s) or allegation(s), and the readiness of the students involved to participate in such a programme.
- 8.10 The intervention strategies outlined in clause 8.9.1 above are tailored for addressing sexually harmful behaviour. Nonetheless, in situations where significant child protection concerns stem from severe non-sexual violence or profound emotional abuse by student(s), these protocols should also be followed.

### Part Nine: Filtering and Monitoring

- 9.1 The School is committed to maintaining a robust filtering and monitoring system to uphold the safe and responsible utilisation of technology by our students. This is not only crucial for fostering a secure digital learning environment but also for ensuring strict compliance with educational regulations.
- 9.2 Currently, the School employs a comprehensive filtering and monitoring system. The School's ICT Department conducts routine monthly assessments of this system, promptly communicating any alarming search trends to the DSL(s).
- 9.3 Recognising the inherent constraints in filtering and monitoring, including challenges posed by personal internet data, VPN subscriptions, personal devices, language variations, and other factors, the School underscores the importance of shared responsibility.
- 9.4 The School encourages the entire school community to maintain vigilance when it comes to internet usage. The school community is encouraged to swiftly report their findings to the Safeguarding and/or ICT Teams promptly should they encounter harmful websites or concerning content.

### Part Ten: Safer Recruitment

- 10.1 It is fundamental that the school recruits and retains staff of the highest calibre who share our School's safeguarding commitment.
- 10.2 All prospective candidates will be informed about pre-employment checks and made aware that online searches may be conducted as part of due diligence checks.
- 10.3 The School's Staff Recruitment Policy (available on the School's website) details the steps and procedures the School undertakes.
- 10.4 All new members of staff will be informed of their safeguarding and child protection responsibilities in the following ways:
  - 10.4.1 All prospective candidates who are called for interviews and new staff will be sent a copy of this policy.
  - 10.4.2 All new members of staff with access to KTJ online services are required to acknowledge they have read and understood this policy, the safeguarding glossary, and other relevant policies via CPOMS StudentSafe.
  - 10.4.3 All new members of staff without online access will be required to sign a letter stating the same above.
  - 10.4.4 All new members of staff will receive a safeguarding induction.
  - 10.4.5 All new members of staff are made aware of key points of SOAC Act 2017 (Sexual Offences Against Children) during safeguarding induction.



## Safeguarding Policy (Child Protection)

### Part Eleven: KTJ Safeguarding Glossary

- 11.1 The [Safeguarding Glossary](#) plays a crucial role in improving safeguarding and child protection efforts. It provides essential clarity and understanding of relevant terms, ensures compliance with laws and policies, promotes effective communication, aids in identifying and reporting concerns, supports training initiatives, fosters transparency, and helps create a safe and nurturing environment for students. In summary, it is pivotal in preventing misunderstandings and continually raising safety standards in our school community.

### Related Policies and Handbooks

This policy should be read in conjunction with the following school policies and handbooks:

- Anti-Bullying Policy
- Anti-Corruption Policy
- Conducting a Search Policy
- Day Visitor Policy
- EAL Policy
- Employee Handbook
- Learning Support Policy
- Lockdown Procedures
- Online Safety Policy
- Overnight Visitor Policy
- Personal Data Protection and Retention Policy
- Registration, Student Absence and Missing Student Policy
- Residents Policy
- Restraint and Safe Touching Policy
- School Trips & Educational Visits Policy
- Secondary Student ICT Acceptable Use Policy
- Staff Code of Conduct
- Staff Concerns Reporting Protocol
- Staff ICT Acceptable Use Policy
- Staff Recruitment Policy
- Whistleblowing Policy
- Guardianship Policy

### Policy Review

This policy is reviewed regularly to ensure that it meets the needs of the School and its students and that it is in line with our vision, mission and values, as well as the CIS Code of Ethics. In undertaking this review, the School will seek input from relevant stakeholders.