

# CHILD SAFEGUARDING POLICY & PROCEDURES

for

IGB International School

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## Head of School Child Safeguarding Commitment

IGBIS is committed to provide a sense of safety and wellbeing for all students in our community. This commitment is a shared responsibility and a priority that we expect all staff to commit to as it is our actions that ensure that children and young people have a healthy environment in which to learn, grow and thrive. We also support the rights and wellbeing of our staff and wider community and encourage their active participation in developing and maintaining a secure environment for all those in the IGBIS community.

Child abuse, child neglect, peer-on-peer abuse and other elements of child protection are multi-faceted issues that involve the dynamics of the child, the family, and the community; complexity that no guide can ever cover in total. This guide provides the principles and framework for all members of the school community to do their utmost to safeguard the students in our care. The IGBIS Child Protection Policy works to respond at all three levels.

Yours in keeping our community safe, healthy, proactive and responsive.

Dr. Greg Brunton  
Head of School

# Introduction

The IGBIS Child Safeguarding Policy is based on the United Nations Convention on the Rights of the Child of which Malaysia is a signatory. It is also based on the Malaysian Child Act 2001, which makes it clear to all parties concerned that abuse, neglect, abandonment or exposing a child to physical and/or emotional injuries while in Malaysia is punishable by law [Act 611]. As part of this mandated policy, IGBIS—by law—is committed to work in cooperation with Malaysian and international agencies and to fully cooperate with these agencies for the best interest of the child.

## Child safeguarding levels



IGBIS commits to the following:

1. In line with the requirements for child care workers as per the Malaysian *Child Act 2001 (amended in 2018)*, ensure that all school staff—teaching and non-teaching—operate as mandatory reporters if and when there is suspected physical, emotional, sexual or other abuse/neglect of a child or young person.
2. Support the child’s development in ways that will foster security, confidence and independence.
3. Provide a systematic means of monitoring children known or thought to be at risk of harm.
4. Integrate age-appropriate material into the curriculum to help students understand personal safety, needs and rights.
5. Utilize best practice with respect to preventative safety measures and practices at all times.
6. Provide thorough background checks on all employees.
7. Provide training to teaching and non-teaching staff on the signs of neglect and abuse.
8. Foster partnerships with our Malaysian community including social service agencies, police and embassies.
9. Provide parents/families with materials and information sessions to help them better understand the school’s policies and procedures in place.

In keeping with our vision statement, IGBIS has adopted this child safeguarding policy to guide our staff and families in matters of child health, safety and care. IGBIS is committed to providing best practice prevention methods and procedures to assure our students are always safe. IGBIS takes child safeguarding issues very seriously, and as educators we are keenly aware of the importance of providing our students with a safe and secure educational environment for them to develop, grow and thrive, every moment of every day.

## Definitions

**Safeguarding** is a proactive approach that aims to prevent harm and promote the welfare of all children.

**Child protection**, on the other hand, specifically deals with cases where a child is at risk or experiencing significant harm, taking reactive measures to protect them.

**Child abuse** is a violation of a child’s human rights and has detrimental effects on a child’s physical, cognitive, emotional, behavioral, and social development. Child abuse occurs when a child is harmed physically, emotionally or sexually through mistreatment or neglect. The effects of abuse can be long lasting and pervasive.

**Physical abuse** is causing internal or external physical injury, not by accidental means. Extreme discipline that causes the child pain or mental suffering is considered abuse.

Examples of Physical Abuse	Indicators* of Physical Abuse
<ul style="list-style-type: none"> <li>● Kicking</li> <li>● Hitting</li> <li>● Pushing</li> <li>● Shaking</li> <li>● Throwing</li> <li>● Drowning</li> <li>● Suffocating</li> <li>● Burning</li> <li>● Biting</li> <li>● Poisoning</li> <li>● Restraining</li> </ul>	<ul style="list-style-type: none"> <li>● Unexplained bruises, welts, cuts or fractures on any part of the body</li> <li>● Bruises of different ages or colours</li> <li>● Injuries reflecting the shape of an object</li> <li>● Injuries that regularly appear after absences</li> <li>● Unexplained burns or burns with a pattern</li> <li>● Injuries inconsistent with the information given by the child</li> <li>● Bald patches where hair may have been torn out</li> <li>● Fear of going home</li> <li>● May flinch if touched unexpectedly</li> <li>● Extremely aggressive or withdrawn</li> <li>● Poor sleeping patterns, frequent nightmares</li> <li>● Poor memory and concentration</li> <li>● Changes in emotion and/or behaviour</li> </ul>

*\*Indicators in and of themselves do not constitute abuse or neglect. Together with other indicators and concerns they may warrant a referral.*

**Emotional Abuse** is a pattern of behaviour where a child is subjected to continuous and hurtful verbal abuse, which disregards a child's emotional well-being.

Examples of Emotional Abuse	Indicators* of Emotional Abuse
<ul style="list-style-type: none"> <li>● Criticism</li> <li>● Negative comparisons</li> <li>● Insults</li> <li>● Rejection</li> <li>● Put downs</li> <li>● Threats</li> <li>● Inappropriate expectations</li> <li>● Yelling</li> <li>● Swearing</li> </ul>	<ul style="list-style-type: none"> <li>● Fear of failing</li> <li>● Fear of consequences, can lead to lying</li> <li>● Mood swings, withdrawal or aggressiveness</li> <li>● Mental or emotional development lags</li> <li>● Social isolation</li> <li>● Low self esteem, depression</li> <li>● Frequent psychosomatic complaints, eg. Headaches, nausea, stomach-ache</li> <li>● Bedwetting and/or diarrhoea</li> </ul>

*\*Indicators in and of themselves do not constitute abuse or neglect. Together with other indicators and concerns they may warrant a referral.*

**Neglect** is chronic or persistent failure to meet a child's basic physical or psychological needs, in the context of resources reasonably available to the family.

Examples of Neglect	Indicators* of Neglect
<ul style="list-style-type: none"> <li>● Inadequate food, shelter and clothing</li> <li>● Lack of hygiene</li> <li>● Not protecting a child from other forms of abuse</li> <li>● Lack of supervision by a parent or legal guardian</li> <li>● Not providing needed medical treatment</li> <li>● Emotional isolation, lack of affection/attention</li> <li>● Failure to support a</li> </ul>	<ul style="list-style-type: none"> <li>● Child is hungry or inadequately dressed or unwashed</li> <li>● Parents are uninterested in child's academic performance</li> <li>● Parents do not respond to repeated communications from the school</li> <li>● Parents or legal guardian are absent for more than 24 hours</li> <li>● Parent cannot be reached in the case of an emergency</li> <li>● Child does not want to go home, loneliness</li> <li>● Unattended medical or dental needs</li> <li>● Developmental delays</li> <li>● Irregular or non attendance in school</li> <li>● Demands constant attention and affection</li> <li>● Regularly displays fatigue or listlessness</li> <li>● Self destructive behaviours</li> </ul>

child's educational needs	<ul style="list-style-type: none"> <li>Lack of trust in others</li> </ul>
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*\*Indicators in and of themselves do not constitute abuse or neglect. Together with other indicators and concerns they may warrant a referral.*

**Sexual Abuse** is any act where an adult or a more powerful person includes a child in a sexual activity. Typically this occurs to satisfy the needs of the person in power. It can be consensual or not, and most sexual abuse is done by a family member or someone the child knows and trusts, therefore children can be groomed, blamed, or manipulated to keep secrets.

Examples of Sexual Abuse	Indicators* of Sexual Abuse
<ul style="list-style-type: none"> <li>Penetrative or non-penetrative sexual acts.</li> <li>Sexual intercourse, anal or oral sex.</li> <li>Touching of genitals or breasts.</li> <li>Undressing or exposing oneself.</li> <li>Forced viewing of sexual acts, genitals, or pornographic media.</li> <li>Developmentally inappropriate conversations about sexual content.</li> <li>The exploitation of a child in prostitution or other unlawful sexual practices.</li> </ul>	<ul style="list-style-type: none"> <li>Sexual knowledge, behaviour or language not appropriate to age level.</li> <li>Unusual relationship patterns.</li> <li>Sexually transmitted infection in a child of any age.</li> <li>Frequent urine infections in both boys and girls.</li> <li>Evidence of physical trauma or bleeding to the oral, genital or anal areas.</li> <li>Difficulty in walking or sitting.</li> <li>Bedwetting.</li> <li>Not wanting to be alone with an individual.</li> <li>Pregnancy especially at a young age.</li> <li>Extremely protective parenting.</li> <li>Having secrets that they cannot tell anyone about.</li> <li>Reluctance to change into PE clothes, fear of bathrooms.</li> <li>Behavioural/emotional disturbances.</li> </ul>

*\*Indicators in and of themselves do not constitute abuse or neglect. Together with other indicators and concerns they may warrant a referral.*

### Measures of Prevention

IGBIS, in cooperation with our Malaysian and international partners, is vigilant regarding security matters, through the form of background checks on all employees and implementing on-campus safety procedures and practices, to assure our students are safe throughout the day. The policy will be made available to parents, staff and communicated to students via the website. By enrolling a child at IGBIS, there is an unspoken agreement to work in partnership with the school to protect children from all forms of child abuse.

IGBIS staff are trained on the possible warning signs of abuse and on our mandated reporting policy. All IGBIS employees have a duty of care as per the staff handbook. IGBIS policies and procedures require all staff to report any suspicion of neglect or abuse according to the referral procedure outlined in this document.

## Roles and Responsibilities

IGBIS is committed to provide a safe environment with all adults being responsible for the well being of students. The school has a Child Safeguard Designated Lead and a Safeguard Child Protection Team.

**Designated Safeguarding Lead** - Responsible for overseeing the Child Safeguard Team, ensuring proper documentation, calling meetings, and staff training.

**Safeguarding Team** - consists of the principals, the head of student services, the school counsellors, the school nurse and the Head of School. The Designated Safeguarding Lead will be responsible to initiate a response team in the event of an incident.

After a case of a reported/suspected child protection issue, the Safeguarding officer shall call a meeting along with the division principal and safeguarding team member that it was reported to, to set further steps. The safeguarding team can be found in appendix 1.

This team is responsible for the Child Safeguarding Policy review and revising, and to ensure that all staff are trained. The policy and training are revisited and at the beginning of each academic year in the orientation programme. The team meets 1 x per cycle.

## Documentation and Confidentiality

### Record Keeping

The Child Safeguarding Designated Lead/Team will keep confidential written documentation of any concerns raised including steps taken in follow up. All documentation should be dated and signed. The documentation is stored in the Child Safeguard google drive.

### Confidentiality

All cases of child abuse, during the investigation through to file closure will be handled in strict confidence and only recorded in a confidential file, held by the Child Safeguarding Designated Lead. Access to the file will only be members of the Child Safeguarding Team.

### Communication

When a student transitions to another school, the new school will be informed that there is a confidential file. The Child Safeguarding Designated Lead from IGBIS will make every attempt to contact and inform the Child Safeguarding Designated Lead at the new school in order to protect the child.

## Reporting and Responding

IGB International School has the following guiding principles in relation to responding to concerns about a child or young person's safety and welfare. IGBIS recognises that any allegation of abuse involves:

### **The right of the child /young person is to be listened to, protected and supported:**

- The right of the child/young person and their families to have their concerns acted on
- The right of the alleged perpetrator to a fair process
- Everyone's right to privacy
- The responsibility of IGBIS to ensure all concerns are dealt with promptly and in a respectful manner.

### **Procedures to be followed in cases of suspected abuse / neglect**



1. All staff, faculty and administrators are mandated to report incidents or suspicions of abuse or neglect to the Child Safeguarding Designated Lead. When there is cause to suspect child abuse has or is occurring, any suspicion is reported as per the school disclosure procedure. All cases reported will be taken seriously and initially investigated within 24 hours. A Safeguarding team will be formed by the DSL with the appropriate safeguarding personnel.
  
2. The Child Safeguarding Designated Lead or member of the Child Safeguarding team may investigate the concern by:
  - Consulting with teachers
  - Observations
  - Talking with the child involved
  - Having the child write, draw or role play
  - Referring to the nurse for examination
  - Consulting with parents
  
3. Depending on the need and the individual case the response will either:
  - Provide pastoral care involving homeroom teachers and/or recommend, to seek counselling support for peer relationships, low self-esteem, grieving, mild depression, social/emotional development that inhibits learning, or parenting skills related to discipline at home

AND/OR

- Refer to outside agencies for investigation and support for cases such as sexual abuse, severe or ongoing physical or emotional abuse, severe or ongoing neglect

### **Extreme Cases**

If the abuse continues, or concerns remain about the safety of the child, reports may be made to the consulate, police, local government authorities, and/or home of record welfare office. The counsellor will maintain contact with the child, family, relevant teachers and SMT members, and outside service providers to provide a network of support for the child and family.

Procedures for the Child Safeguarding Designated Lead:

- Once notified of a concern the Child Safeguarding Lead will then proceed to manage the case confidentially.
- Steps should be taken to immediately ensure the child or young person's emotional and physical safety. If appropriate the child or young person's parents or caregivers will be notified.
- If necessary, prior to formally reporting the incident, the Child Safeguarding Designated Lead may consult with the Head of School of IGB International School for advice and information.
- When a decision is being made to report to the police or the Department of Human Services Child Protection Unit, the Child Safeguarding Designated Lead, if feasible, will do so in consultation with the Head of School of IGB International School. Any notification must happen promptly and the child or young person's safety/welfare should be the top priority.
- Any support required by the child, young person, their family or staff of IGB International School is to be arranged by the Child Safeguarding Designated Lead.
- If the alleged perpetrator of the abuse is a staff member (paid or voluntary) of IGB International School, the Head of School must initially remove this person from

contact with the children and young people. This may include “standing down” the person until investigations are complete. Consultation with the Board needs to occur prior to the “standing down” or as soon as possible afterwards. Formal follow up in relation to a staff member being stood down is to be managed by the Head of School

- Throughout the whole process the Child Safeguarding Designated Lead must keep the Head of School informed of any developments in the situation.
- The Child Safeguarding Designated Lead must ensure their concerns about a child or young person’s welfare are being acted upon, this may mean in some circumstances reporting to the relevant community social services

#### Procedures for the Head of School

- Support the Child Safeguarding Designated Lead and IGBIS as required.
- Is responsible for the formal follow up of a staff member being “stood down”.
- Will respond to any media and external enquiries to the situation.

### Whistleblowing

Should there be a question or concern about the conduct of a fellow employee with respect to child safeguarding, the concern should be taken directly to the Head of School. Should the concern be about the Head of School, the Board Chair of the Management Board should be contacted through the Executive PA.

### Personnel Oversight

IGBIS has a Code of Conduct policy stating clear expectations and guidelines for all staff employed by the school and can be accessed [here](#).

Monitoring of personnel will be overseen by division level Principals, line managers including Department Heads (including HR) and the Head of School.

### Recruitment Procedures

- In all advertisements and material promoting positions, the organisation’s commitment to child protection and screening mechanisms are made clear.
- Written position descriptions have been developed for all positions, which include key selection criteria and promote IGBIS’s commitment to child protection.
- Interview and Background Check Procedures are conducted prior to a person being appointed as a staff member through background checks by the recruitment committee and the Human Resources dept. For those who are currently working overseas, criminal record checks from all countries they have lived in will be a condition of employment.
- Police Checks are conducted on all IGBIS staff and volunteers prior to working at the school, including companies that are contracted to the school.

## Training

Staff are required to participate in education and training programs to improve their knowledge of child protection and best practice in responding to allegations of abuse and neglect.

Staff are supported and supervised as positive role models to children and young people. Any concerns in relation to their suitability to work with children and young people should be

addressed in the Performance Management process.

Stakeholder Group	Training
HOS, Division principals, DSL, Head of HR, a Board Member	Level 3
ADs, Service Coordinator, Counsellors, GLCs and selected PoRs	Level 2
Academic staff (teachers, ATs, IAs etc.)	Level 1
Board members	Level 1
Admin and support staff	Child Protection Basics
Enrichment providers (Music Academy, ASA external providers ...etc.)	Child Protection Basics

**Child protection Basics:** An introductory course for admin and support staff and enrichment providers.

**Level 1:** Child Protection Induction for Educators

**Level 2:** Advanced training in Child Protection for Educators

**Level 3:** Specialist Training or Key Stakeholder Training\* (For academic support this may include key people in HR).

All teaching staff are required to be trained at Level 1. The DSL/team will have higher training (Level 3)

Student Education - Students are empowered to be their own advocates for their well being. As part of the PSHE/Wellness time in the classroom, students are taught social emotional well being. This is taught by the wellness teachers and homeroom teachers, with counselor support.

## Security and Related Considerations

All programs, activities and campus environment at IGB International School are required to undergo regular child protection risk analysis. This will be carried out by the Child Safeguarding Designated Lead/team members and the person(s) in charge of programs and activities. The risks are evaluated and strategies developed to minimise the likelihood of harm occurring.

### Documenting Learning and Collecting Evidence

**Process** - Teachers and Associate Teachers document learning by capturing photos, videos of children, and artefacts (products of children's work/play such as drawing, designs, models, art, etc.). This process is done regularly in all grade levels with the students being informed and aware of their teachers documenting learning. Teachers talk to students about documenting learning (making it visible) and reflecting on learning as part of our teaching, learning and

assessment process. Children have the right to refuse to be photographed, recorded or have photos or videos of their work taken.

**Format** - Learning is captured through photos, videos, voice recordings or photos and videos of artefacts. The evidence belongs to the child and their family and is used by the teachers/school in order to reflect on, and inform the next steps of teaching and learning.

**Devices** - Evidence of learning can be captured on school devices such as iPads, iPods and cameras, as well as teacher's private devices, however, media on personal devices must be regularly uploaded to the school's storage servers/systems/platforms and then deleted.

**Storage** - All evidence needs to be stored on the school servers/systems/platforms via the use of Google Drive, Google photo albums, etc.

**Sharing** - Evidence of student learning can be shared with families and the school community via school and class newsletters, school assemblies or performances, Toddle Classroom and Toddle Journal Posts, ManageBac, etc. When posting photos or videos of multiple children together and tagging multiple student/parent accounts in it (swimming, performing, group work, etc.) the following disclaimer should accompany the post.

“ \* This photo/video is to be viewed solely in the context of an IGBIS student's portfolio and not shared by parents/guardians/third parties on any other media channels.”

## **Marketing and School Created Content and Publications**

In the case of whole school newsletters, social media content, school brochures and other publications, the school needs written permission/acknowledgement from the parents agreeing to the child's image being used publicly. This is done through the terms and conditions as shared during the admissions process.

## **Security**

### **ID Badges and Access**

The school has installed a security tagging system on all doors and turnstiles leading into the school. Elementary students use an RFID bracelet, while Secondary students have ID cards on lanyards. Only approved adults and students can access the internal campus. Any visitors are accompanied throughout their visit by the department who invited them, for example photocopier technicians would be supervised and accompanied by the IT department. Different colour lanyards identify staff, students and parents.

### **Campus Monitoring/CCTV**

The IGBIS campus has an extensive CCTV security system that is monitored by the Head of Security or their designate. These are located at strategic places around the school and their placement is evaluated on an annual basis. In the Fireflies area as part of the requirements by the issuing government agency of our 2-3 year olds programme, CCTV has been installed in the classroom. During re-licensing these provisions are checked.

Security personnel are deployed throughout the IGBIS campus and monitor one off outside contractors when they are working during the school day for short periods of time. In instances where CCTV is used to follow up on an incident or accident, only the Head of School may decide whether to share the video with parents and/or a third party to uphold data protection and a right to privacy of those in the video.

## **Requirements for Visitors**

All visitors are required to be logged by security before entering the IGBIS campus. Visitors sign in at Level 5 reception using a Google Form which outlines our child protection expectation. It is a requirement for them to acknowledge the child protection agreement which outlines their role within the school environment.

## **Use of toilets at IGBIS**

There are designated toilets throughout the campus that are labelled for use by students and by adults. Single toilets are designated as “for everyone” meaning adults, non-binary, differently-abled, etc. The Child Safeguarding Team, along with the facilities manager will ensure that the general toilets are designated and labelled for all students and adults.

# **Monitoring and Evaluation**

## **Regular Reviews**

The Child Safeguarding Team will meet at least two times a year, once at the beginning of the school year and once during the second semester. The first meeting will be to review and revise this policy and staff training. It is the responsibility of the Child Safeguarding Designated Lead to keep this document up to date.

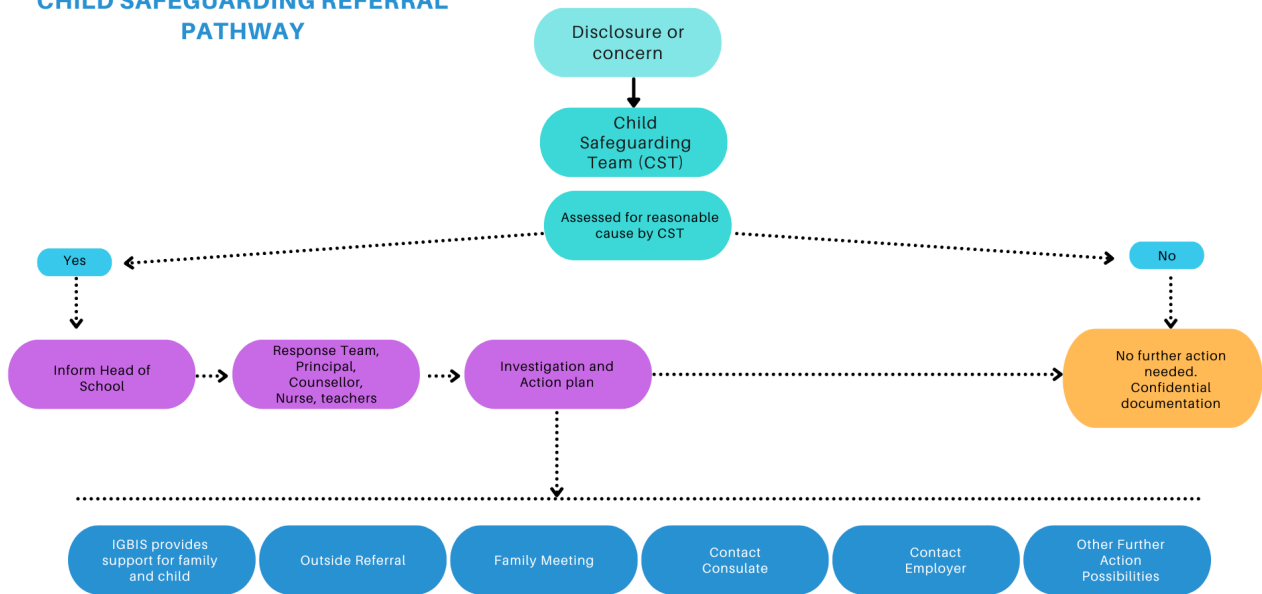
## **Risk Assessment**

A self audit review (appendix) will be conducted at the end of the year by the Child Safeguarding Team.

## **Process of Incident Inquiry**

See flowchart below for incidents. A debriefing meeting will take place with those involved to discuss the incident, and to ensure procedures were followed. Record keeping, accuracy and improvements will be discussed.

### CHILD SAFEGUARDING REFERRAL PATHWAY



## Appendices

RAMS form template updated 21-22

Link to visitor sign in procedures [Visitor registration form](#)

Link to short term guardian agreement [here](#)

Link to Malaysian Child Act [here](#)