

STUDENT SAFEGUARDING POLICY (Policy/policy)

Approved by	Chief Executive Officer			
Date Approved		Status	APPROVED	
Policy Owner	Principal	Reviewed & Recommended for Approval by	Principal	
			Head of Human Resources	
Version	1.0	Originator/Prepared by	Legal and Compliance Manager	

Contents

Introduction.....	3
Philosophy.....	3
Aims of the Policy	3
This Policy serves to:	4
Definitions	4
Students	4
Duty of Care.....	4
Key Roles	4
Members of the Safeguarding Team.....	5
Board Member for Safeguarding	5
Designated Safeguard Lead (DSL)	6
Deputy Designated Safeguarding Lead (DDSL).....	6
Members of the Safeguarding Team.....	6
KYUEM College Staff	7
Other Adults/Visitors to KYUEM	7
Safer Recruitment.....	8
New Staff.....	8
Staff Training and Support.....	8
Safer Working Practices	8
Professional Conduct	8
Staff and Student Communication via social media & WhatsApp	9
One-to-One Meetings	9
Dealing with Crushes and Infatuations.....	10
Student self-harm	10
Online Safety	11
Trips	11
When you have a concern about a student	12
Managing Disclosures	13
Disclosure by a Student.....	13
Reporting Procedures	14
KYUEM Internal Safeguarding Procedures.....	14
Reporting Concerns.....	14
Low Level Concerns.....	15
Concerns about a Colleague	16
Follow-up Actions	16
Unfounded Allegations.....	16
Whistle Blowing	17
Record Keeping.....	17
Supporting Staff and Ensuring Well-being.....	18
Confidentiality and Information Sharing	18
Supporting Our Sponsors in Upholding Their Safeguarding Practices	19
Appendices.....	20
Appendix 1: Types of Child Abuse and General Definitions	21
Appendix 2: Guidelines for dealing with disclosures:	24
Appendix 3: 4 Rs of Reporting	26
Appendix 4: Reporting Procedures Flowchart	28
Appendix 5: Reporting Structure for High Level Concerns.....	29
Appendix 6: Reporting Abuse	30
Appendix 7: List of Support Agencies	31
Appendix 8: Safeguarding Form for Recording Disclosures (High Level Concern)	33
Appendix 9: Safeguarding Concern Form (Low Level Concern).....	36
Appendix 10: Safer Recruitment Checklist.....	39

Introduction

Kolej Yayasan UEM (KYUEM) is a place for students to achieve, grow, and develop their capabilities and skills. It is a place for students to challenge themselves in a healthy environment. Students don't just learn at KYUEM; they acquire the knowledge, mindset, and experience that will prepare them for their future.

Our Student Safeguarding Policy is written with this ethos at its heart.

Philosophy

KYUEM has a strong commitment to protecting its staff and students and acknowledges the duty of care to safeguard and promote the welfare of students. The college is committed to ensuring safeguarding practice reflects child rights' conventions, Malaysian government legislation and complies with international best practice including guidance issued by UNICEF and outcomes in line with the United Nations Sustainable Development Goals (SDGs).

This Policy reflects KYUEM's commitment to respect, promote, uphold, and protect the rights of the student as set out in the United Nations Convention on the Rights of the Child (UNCRC) and in line with KYUEM values.

This policy also recognises that a student-centered approach is fundamental to safeguarding and promoting the welfare of every student. This means keeping the student at the forefront when making decisions concerning them and working in partnership with them and their families.

The UNCRC calls for the primacy of a young person's best interests in all decisions affecting young people and the importance of seeking and respecting the views of the young person.

Aims of the Policy

Safeguarding is the responsibility of all. The procedures and processes contained in this Policy apply equally to:

- All staff
- Volunteers and interns
- Associates of KYUEM
- Sponsor Foundations affiliated with KYUEM
- All KYUEM visitors

This Policy serves to:

- promote a student safe and friendly culture where everyone is committed to keeping students safe.
- provide a clear direction about expectations of, and our commitment to, safeguarding and promoting the welfare and wellbeing of all students at the college.
- raise the awareness of all staff of the need to safeguard students and of their responsibilities in identifying and reporting possible cases of abuse or neglect.
- provide a framework to manage all suspicions and allegations of poor practice or abuse seriously and respond to any complaints or reports of abuse and exploitation swiftly and appropriately.
- ensure that all adults (including external parties and visitors to campus) who have access to, or contact with students, have the relevant and appropriate checks in place, are recruited in a safe way, are offered training and updates and are clear about their roles and responsibilities in protecting students from danger and being hurt.

KYUEM will treat any breach of this Policy seriously. Failure to comply with this Policy may constitute disciplinary action (including possible dismissal) to termination of contracts or partnerships, and where appropriate, may result in referral to the police or other relevant authorities.

Definitions

Students

Malaysia's legislation as regards the definition of a child in civil law to be a person below 18 years of age. For the purposes of Safeguarding and Child Protection at KYUEM, all persons undertaking activity as a student within the college is classified as a child, and within this policy is referred to as 'student'.

Duty of Care

KYUEM has a legal and moral obligation to respond to cases of harm and abuse when these are identified through our engagement with students. KYUEM acknowledges the duty of care to safeguard and promote the welfare of its students and is committed to ensuring the highest standard of safeguarding practice

Key Roles

Every member of staff at KYUEM has a responsibility to ensure that students are kept safe. Key roles have been established to provide a central point of contact and expertise in matters related to Child Protection and Safeguarding.

Members of the Safeguarding Team

To ensure compliance with this Policy, the College Principal will ensure that:

- This policy, and all related Safeguarding Policies and procedures, are implemented and followed by all KYUEM staff.
- The establishment of a Safeguarding Team that meets at least once a term to monitor organisational safeguarding practices and promote best practice across the college.
- Succession planning is in place for the replacement of named Safeguarding persons ensuring timely and accurate information handover of student concerns
- Annual review of this policy, alongside changes to process and procedure, and the Policy is updated annually based on findings and/or whenever there is a relevant change in the law.

This team will include:

- A designated person for Safeguarding is named on the KYUEM Board of Governors
- A designated person is named as Designated Safeguard Lead (DSL), supported by a named Deputy Designated Safeguard Lead (DDSL)
- Named representation from the Academic and Boarding House staff

Members of the Safeguarding Team	
Board of Governors Member/CEO for Safeguarding	CEO of KYUEM
Designated Safeguarding Lead (DSL)	Counsellor
Deputy DSL (DDSL)	Principal
Members of the Safeguarding Team	2 representatives each from the Academic and Students Services Departments.

Board Member for Safeguarding

The Board of Governor Member for Safeguarding will:

- Be the point of contact to the KYUEM Board of Governors for any issues relating to safeguarding
- Support and advise the senior leadership in managing any safeguarding concerns/investigations that may affect the reputation and standing of the organisation, or very serious harm to a student.
- To support the senior leadership team with the official reporting of any serious incidents to the Welfare Department, Health Authorities and/or police as appropriate or required by applicable law or this Policy.

Designated Safeguarding Lead (DSL)

The role of the DSL is:

- to lead and oversee the safeguarding function at KYUEM, promoting awareness and compliance to this Policy
- to work alongside the Safeguarding team to ensure compliance and understanding of procedures and guidelines within this policy
- ensure timely reviews take place of this policy and the procedures and guidelines within it, ensuring effective implementation
- act as the first point of contact for staff on issues of child protection and safeguarding.
- investigate any reported safeguarding concerns in line with the college's procedures.
- speak with parents, where necessary and appropriate, when issues relating to child protection and safeguarding, and student welfare have been raised.
- ensure effective reporting and recording systems for all safeguarding issues which are manageable, confidential, enable clear communication and are not 'person dependent'.
- to act as a source of support and information for staff and others who are required to comply with this Policy
- be alert to changes in legislation affecting Safeguarding practices
- develop and maintain contacts with other relevant agencies and supporting services
- provide regular capacity building and updates for all staff, including maintaining records of staff training and responding to the college's emerging needs.

Deputy Designated Safeguarding Lead (DDSL)

The Deputy DSL is appropriately trained and acts in the absence of the DSL; carrying out the functions necessary to ensure the ongoing safety and protection of all students.

Members of the Safeguarding Team

Named individuals from the staff team, including at least one representative from the Academic and Boarding Staff, make up the Safeguarding Team. This body includes the named people acting as DSL and DDSL.

The aims of the team are:

- to support safeguarding at KYUEM, promoting awareness and compliance to this Policy across the college community
- to work alongside the DSL and DDSL to ensure compliance and understanding of procedures and guidelines within this policy
- contribute to timely reviews of this policy and the procedures and guidelines within it,

ensuring effective implementation

- act as point of contact for staff on issues of child protection and safeguarding, offering advice and support to staff who have concerns about a child.
- be alert to changes in legislation effecting Safeguarding practices
- develop and maintain contacts with other relevant agencies and supporting services
- plan and implement regular capacity building and updates for all staff, including maintaining records of staff training and responding to the college's emerging needs.

KYUEM College Staff

College staff will adhere to the following best practice:

- Implement the Student Safeguarding Policy and procedures.
- Be committed to the expectation that the welfare and wellbeing of students is a joint and collective responsibility and of paramount importance.
- Maintain and demonstrate an attitude of "it could happen here".
- Recognise their position of influence and 'perceived power' in their role as a member of staff.
- Familiar with and follow the guidelines and procedures detailed in this policy and all related policies
- Be vigilant to safeguarding-related issues; not hesitating to report something which makes them feel uncomfortable and trusting their instincts.
- Recognise and understand that some behaviour can be a student's way of communicating distress and changes to behaviour may be an indicator of a safeguarding concern.
- Have a firm understanding of the five main categories of abuse: physical abuse, emotional abuse, sexual abuse, neglect and bullying.
- Have an understanding that there are many ways in which students can be abused such as Self-Harm, Online/Cyber Bullying, Grooming, Sexual Exploitation, and Extremism.
- Have an understanding that poor / non-attendance can be a sign of a safeguarding concern.
- Be student-centered in their practice; acting in the best interests of the student at all times.

Other Adults/Visitors to KYUEM

Outside KYUEM teaching staff, all visitors will:

- Be committed to the expectation that they are responsible for safeguarding students when on the premises.
- Cooperate with the college and comply with the guidelines and procedures detailed in this policy.

- Report any concern about child protection to the college authority.

Safer Recruitment

KYUEM seeks to recruit staff who are committed to the highest standards of personal and professional conduct. Recruitment policy is outlined in the College Staff Handbook, Section 4.1.

New Staff

All new staff will receive a safeguarding induction within their first 3 months at work. At the induction, they will be sent a copy of this policy, and sign a letter confirming that they have read and understood the document. This will be kept by the Principal's Office.

Staff Training and Support

KYUEM shall provide training and support designed to ensure that staff and others required to comply with this Policy understand their safeguarding responsibilities and have the knowledge and skills necessary to fulfil their obligations.

Capacity development on safeguarding will be provided across the College on an annual basis, for all academic and boarding staff members. Other staff will receive training as and when required. Mandatory training will be provided following any new policy changes.

Safer Working Practices

Professional Conduct

These guidelines exist in parallel to Section 11.2 Code of Conduct, stipulated in the KYUEM Employee Handbook.

Further to these guidelines staff must ensure they:

- respect differences and never discriminate on the grounds of gender, sexual orientation, culture, race, ethnicity, disability, and religious belief systems.
- never act in a way that could be perceived as threatening
- listen to students and take their contributions seriously.
- never make sarcastic, insensitive, derogatory, or sexually suggestive comments or gestures to or in front of students
- respect a student's right to personal privacy and use caution when discussing sensitive matters
- maintain a safe and appropriate distance with students
- be aware of individual's tone of voice, body language and behaviour around students and never partake in situations that may be misconstrued.

- build a balanced relationship based on mutual trust which empowers students to share in the decision-making process
- avoid spending excessive time with any one student or otherwise showing favoritism.
- never take a student to your home, hotel, or any other private space.

Staff and Student Communication via social media, WhatsApp and live virtual platforms.

At KYUEM we acknowledge the maturity of our students in undertaking their A level examination, and staff/students often use WhatsApp for speedy communication and clarification. It is important that good practice guides all staff in their communication with students.

Whilst the college does not prevent staff from using this form of communication, staff must be aware they may be asked to show Senior Staff messages when requested. Staff are advised not to delete messages received from students.

Staff are also discouraged from connecting with students individually on social media platforms such as Facebook, Messenger and Instagram. This includes appearing in photos with students on personal accounts.

KYUEM recognises that staff and students communicate in WhatsApp groups. KYUEM expects that equal conduct of professional communication is carried out when having online interaction.

KYUEM cautions against contacting students individually unless whenever necessary for emergency matters and communications on WhatsApp should be carried out with at least 2 staff members 'present' in the group including an HoD or his/her Deputy.

One-to-One Meetings

To ensure students are fully supported both academically and pastorally, one-to-one meetings will sometimes need to be scheduled. Some meetings will be pre-arranged and some ad hoc, where a student will go and see a teacher to seek help.

Staff working in one-to-one situations with a student are more vulnerable to accusations and must take steps to ensure the meetings are always conducted professionally (i.e.- meetings with counsellors, pastoral care teachers, Principal, other college staff should adhere to the guidelines set below.)

The following are general guidelines:

- Meetings should be held in an environment where there are other members of staff

in proximity within the same building.

- Meetings should always be held in a room where the students and the member of staff can easily be seen from the corridor
- When conducting the meeting, staff should avoid all unnecessary physical contact and avoid sitting or standing in unnecessary proximity to the student.
- If a meeting is scheduled outside of the normal college day, the meeting should only be held with a specific professional purpose that is understood by the student involved.
- In boarding houses, meetings should be held in open spaces, corridors, or office spaces.

Dealing with Crushes and Infatuations

Staff need to recognise that it is not uncommon for students to be strongly attracted to a member of staff and/or develop a crush or infatuation with an adult.

- If a member of staff becomes aware that a student has developed a crush or has an infatuation with them, they must report their observation/concern to one of the DSLs or Principal immediately.
- If a staff member becomes aware that a student has developed a crush or infatuation with another adult in a position of trust within the school, they should report this observation/concern to the DSL or Principal immediately.
- Early and effective intervention should be taken to prevent escalation and avoid hurt, embarrassment or distress for those concerned.
- The member of staff concerned should keep a log of all contact with the student and share this with the DSL or the Principal.
- If a Crush or Infatuation becomes extreme, further safeguards for the member of staff and the student will be required and planned in consultation with the staff member involved. This plan must be reviewed regularly.
- Staff should make every effort to discourage crushes and infatuations by following the guidelines for safer working practices.

Student self-harm

Self-harm, also known as self-injury, is defined as the intentional, direct injuring of body tissue. Self-harm can be, but is not always, an indicator of suicidal intent. A student that you suspect is self-harming must be referred to the College Counsellor and the relevant DSL.

The College Counsellor then needs to conduct a session with the student after he/she gets treatment for the injury. The Counsellor or a Matron will determine whether the case should be referred to a specialist or not. Parents need to be informed about this issue. This should be recorded on the formal reporting form. Staff should not try and counsel the student

themselves. Listen and then report.

Online Safety

KYUEM is committed to keeping pupils safe online.

We therefore ensure that:

- All staff understand that students can be harmed online via hurtful and abusive messages, enticing them to engage in age-inappropriate conversations, sharing and production of indecent images or encouraging risk taking behaviour
- Online bullying by students, via electronic messages, will be treated as seriously as any other type of bullying
- Staff should report any concerns of a safeguarding nature linked with technology to the DSL. These are Safeguarding issues and not technology issues.

Trips

The information below must be considered alongside the staff Code of Conduct in the KYUEM Employee Handbook, Section 11: Code of Practice

- All policies of adhering to professional distancing on College premises and applicable to official College trips.
- All College trips are official, and must be approved by senior management.
- All student participants on a College trip must have signed approval from a parent.

Staff must:

- Ensure that if mixed teams are taken away for the day or night, they should always be accompanied by a male and female member of staff
- At events, additional guidelines shall be observed:
 - Staff should not enter students' rooms unless necessary.
 - If it is not possible for staff to enter the room as a pair, then the door must remain open.
 - Staff must make clear his/her reason for being in the room to the students.
- Staff must never invite student(s) to their room.

Staff should not assist students that ask them to bring them to an unauthorized outing.

For any emergency case like sudden bereavement or grave family illness, staff are allowed to send students to their home, bus or railway station, or airport.

When you have a concern about a student

We recognise that, because of their day-to-day contact with students, school staff are well placed to observe any outward signs of abuse or significant changes in student behaviour, which may be a cause for a safeguarding concern.

Staff must be aware how to act and respond to a student who discloses a safeguarding concern, or who is demonstrating behaviour that is giving a cause for concern.

The following list is not prescriptive and many signs listed will not necessarily indicate abuse but staff should be vigilant and alert in noticing:

- Unexplained injuries including bruises, scratches, cuts, burns.
- Comments or language from the child that cause concern.
- Deterioration in general well-being including behaviour and / or physical appearance.
- Truancy, lying or stealing.
- Bullying other students or being bullied.
- Aggression or abuse towards others.
- Issues with personal hygiene.
- Significant alterations in behaviour.
- Unauthorised absences from college that do not have reasonable explanation or exhibit a suspicious pattern.

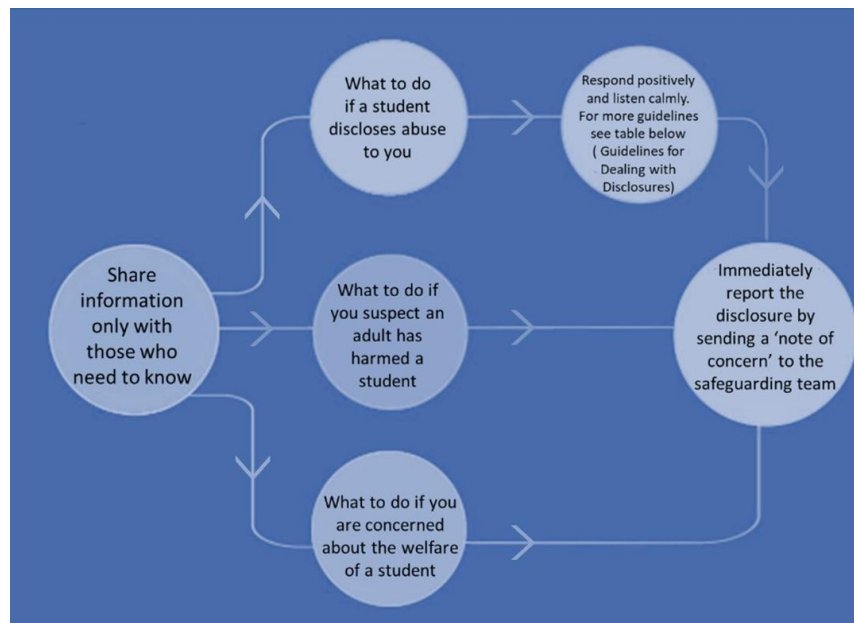
When a safeguarding concern is brought to your attention – [ACT](#).

A	Act on your concerns. If in doubt, speak out!
C	Child-centered. The protection of students is the most important consideration.
T	Time counts. Ensure timely, effective, confidential, and appropriate responses to the student.

It is the responsibility of all staff to take seriously any concerns, complaints, allegations, suspicions, or incidents involving students. Reporting these concerns to the DSL or DDSL is a KYUEM mandatory requirement.

- i) Verbal reports
- ii) Proforma/written report must be accompanied

Reporting structure for Staff:



Failure to report concerns regarding student safety within 72 hours will be considered a serious breach of KYUEM's Safeguarding Policy, and an investigation will be conducted by College Leadership that may result in disciplinary action.

Managing Disclosures

Students witnessing or experiencing harm, distress or abuse may seek to 'tell' or 'disclose' within college, as this is often the place where they feel safe, secure, and heard. It is not uncommon for students to choose 'periphery staff' for example, counsellors, office staff or support staff, as they can be perceived as having less authority or be less intimidating.

It is important to remember that a KYUEM member of staff has a responsibility to recognise and refer potential abuse.

Disclosure by a Student

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.

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 to help them, they must pass

the information on to others, such as the Safeguarding Team or the Principal. The point at which they tell the student this is a matter of professional judgement, but it is best done at the earliest opportunity.

When a member of staff has a concern about the welfare of a student, the staff should follow the basic guidelines for dealing with disclosures in [Appendix 2](#).

Reporting Procedures

KYUEM Internal Safeguarding Procedures

Concerns about harm or abuse must be internally reported where:

- You observe concerning behavior/abuse in a student.
- The alleged perpetrator is a KYUEM staff member, visitor, or associate, or someone known to KYUEM.
- The alleged perpetrator is a member of the students' family or community or is unknown to the child.
- The alleged perpetrator is also a student, although responses should consider the protection and safety of both the student victim and the alleged child abuser.
- The abuse is historical. Most abuse is not disclosed until many years after it has occurred.
- The report is anonymous, as this does not automatically mean that it bears less substance (may indicate fear of reprisal, shame or other barriers to disclosure).

Reporting Concerns

- Any member of staff or adult who is told of any incident or who has suspicions of a safeguarding issue must report the information immediately to the DSLs.
- Use guidance from this policy about managing disclosures (see [Appendix 2](#)).
- Staff members can never give absolute guarantees of confidentiality. They should, however, guarantee that they will only pass on information to the minimum number of people who must be told to ensure appropriate action is taken.

This includes reporting any concern which:

- may have been noticed, overheard by them.
- has been directly disclosed to them by the student concerned, another student, or another member of staff.
- happen to a student at home or outside the college environment.

If one of the DSLs cannot be contacted, then a Back-up DSL should be found. Not being able to find, or contact a DSL, should not be used as a reason for delaying reporting an incident.

The incident, no matter how small, should be reported on the day it occurs - even if the college day is over.

- Referrals and reports of incidents, disclosures, allegations, or suspicions should be made in writing. If they are done by phone, a written report of the telephone conversation should be made.
- Staff should not use no time for 'writing down' or 'form filling' as an excuse for not reporting immediately. Staff do not need to have written things down to be able to report them. Verbal reports can be relayed and followed up at the nearest possible convenience.
- Staff should not use the excuse of 'couldn't find the correct form' as an excuse for not writing down a concern. If the correct form cannot be found, then any paper should be used, and a cover form attached to this as soon as possible.

Low Level Concerns

There may be times when a staff member is unsure if an incident warrants a 'report'. In these cases, the following guidelines can help:

- A **low-level concern** is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' about the welfare of a student.
- The early identification and prompt and appropriate management of concerns about staff and all adults who are in contact with students are critical to effective safeguarding.
- A low-level concern about an **adult working in the college** can be from the inadvertent or thoughtless, through to an action that intended to enable abuse.
- Being over-friendly with students, having favourites, engaging with a student one to one in a secluded area, using inappropriate sexualised, intimidating, or offensive language.
- Students and staff do not need to be able to determine in each case whether their concern is a 'low-level', or not serious enough to consider a referral.

In these cases, a responsive, sensitive, and proportionate handling of these concerns when they are raised will be the approach taken. The intention of addressing low level concerns is to support an individual to correct concerning behaviour at an early stage. The aim is to clarify or reestablish boundaries and restore professional relationships before it becomes more difficult to do so.

If a member of staff is unsure if they should make a report:

- Students and staff can consult the Principal or the DSL on a "no-name" basis.

- Once staff share what they believe to be a low-level concern, that determination should be made by the DSL (who will inform the Principal of all reported concerns regarding adults working in the school).
- Where the low-level concerns are about the DSL or someone in the Safeguarding Team, the Principal should be the first point of contact. Likewise, low-level concerns about the Principal should be referred to the CEO.

Concerns about a Colleague

If staff have safeguarding concerns about another staff member who may pose a risk of harm to children, this must be referred directly to the School Principal and/or Human Resources, as outlined in the Employee Handbook, Whistleblowing, Section 11.5.

The following appendixes can be assessed by staff to aid correct and accurate reporting:

[Appendix 2: Managing disclosures](#)

[Appendix 3: 4Rs on Reporting](#)

[Appendix 4: Reporting Procedures for all Staff](#)

[Appendix 5: Reporting for High Level Concerns](#)

[Appendix 6: Reporting Abuse](#)

[Appendix 8: High Level Safeguarding Form for Recording Disclosures](#)

[Appendix 9: Low Level Concern Form](#)

[Appendix 10: Safer Recruitment Checklist](#)

Follow-up Actions

If having raised a concern about a student with the Safeguarding Team, a member of staff disagrees with the subsequent actions, he/she should raise the matter with the Principal, or where the Principal is implicated, with the CEO. The college's Whistleblowing Policy details the steps to take.

Unfounded Allegations

All safeguarding allegations will be treated seriously by the college.

In the event of an allegation against a member of staff being unfounded then normally the member of staff will be free to resume their duties. However, each case will be treated on an individual basis and the following may be considered before a member of staff is able to resume his or her duties:

- A risk assessment may be necessary.
- The college's disciplinary procedure may be invoked, even if the member of staff has been cleared of the initial allegations should there have been other breaches of the Code of Conduct.
- Additional support will be offered if necessary.

In the event that an unfounded allegation is made against a student, support will be provided to that individual as needed.

The Principal with the Disciplinary Committee will decide what disciplinary action, if any, should be taken, and ensure the involvement of Parents.

Whistle Blowing

Refer to the Whistle Blowing Policy, Employee Handbook, Section 11.5.

To safeguard staff welfare KYUEM advocates:

- staff to share any concerns regarding any staff practices that compromise the safety of the students to DSL or a member of the Safeguarding team.
- any staff member who discloses a concern will be given assurance of confidentiality as far as practically possible, without jeopardy to any investigations by external authorities or KYUEM's internal investigation procedures and processes.
- any staff member expressing a concern about their safety following a disclosure will be given all necessary support to enable them to continue in their role with security safely.
- where external authorities are conducting their own enquiries, KYUEM will carry out its own investigation in parallel without jeopardy to any official enquiries.

Record Keeping

A central database of all safeguarding incidents is maintained. Records will be stored on a password-protected QIAB or Microsoft TEAMS folder with access only to the DSLs and College Principal. An electronic summary file (password protected) will be kept of all safeguarding concerns including referrals to the college Counsellor and forms submitted by staff.

The data is anonymized and reviewed in the DSL and Safeguarding Team's annual report to the Board of Governors. In this review, the DSL, Safeguarding Team, and Board evaluate the effectiveness of response, identify gaps in resources and knowledge, and develop methods to improve practice.

Access to confidential records is limited to the DSL and Safeguarding Team but is shared with other KYUEM personnel to appropriately respond to safeguarding concerns as deemed necessary by this policy and with permission from the DSL.

If a student begins to cause concerns and reports are made of a safeguarding nature, the DSLs may contact the student's previous schools/college and ascertain if there were any previous

child protection concerns / records.

Parents and Students will be informed if information is requested by parties outside of KYUEM, and the views and wishes of the student will be considered when deciding to share information. Consent for sharing will be secured wherever possible.

The College will retain records for 5 years.

Supporting Staff and Ensuring Well-being

A student safeguarding situation can be extremely stressful.

- Having regular contact with a student who is struggling can bring about a sense of powerlessness and anger.
- Having to report may not sit easily with staff.
- The act of making a report about a student can also be psychologically demanding and staff may worry about the implications of their actions:
 - *Did I do the right thing?*
 - *What will happen to the child now?*
 - *Will the student be taken away from his/her parents?*
 - *Do I tell the parents that I am making a report?*

Staff who have been impacted by an incident/participation in a safeguarding concern should seek appropriate support when necessary.

The DSL should:

- recognise that the colleague/staff has been affected by their involvement.
- provide encouragement and emotional support.
- providing an opportunity to talk about how they have been impacted by the trauma.
- encourage colleague/staff to seek professional assistance and/or counselling.

The DSL, supported by the Principal will provide suitable supervision and support to staff and volunteers affected by any child protection issue raised to reduce the stressful impact of the situation. Where the Principal needs to seek support, they may consult the CEO or the Designated Board Member for Safeguarding.

Confidentiality and Information Sharing

KYUEM staff will have access to personal and confidential information. In some cases, this information will be highly sensitive.

It is only appropriate to share this information when it is in the interests of the student to do so. In circumstances where the student's identity does not need to be known, the information will be used anonymously.

All staff will understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the student and/or staff involved but also to ensure that the information being released into the public domain does not compromise evidence.

The responsibility for decisions and subsequent actions rests on KYUEM as an institution, not with any individual.

Staff must consult with the KYUEM DSL and /or Principal regarding any student protection, except in the case where a student is in immediate danger.

- Information will be immediately shared with parents if a student is considered at immediate risk.
- Parental consent for any specialist support will be sought, and this may include sharing information that a student does not consent to. Wherever possible, KYUEM will support the student in speaking with parents.
- Information pertaining to Child Protection or Safeguarding concerns that affect academic achievement or attendance of a student may be shared with sponsors when it is in the best interest of the student. Wherever possible, consent to share information will be secured from the student or the students' parents.

Supporting Our Sponsors in Upholding Their Safeguarding Practices

KYUEM recognizes that there is a sponsor relationship between KYUEM, sponsors, partners and stakeholders. Through our capacity development resources, we aim to collaborate with our sponsors to work in partnership to ensure a safe environment for our students.

Appendices

Appendix 1: Types of Child Abuse and General Definitions

No	Term	Meaning
1	Child Safeguarding	Child safeguarding incorporates ‘all the student-centered actions and measures the College needs to have in place to prevent or reduce the likelihood of concerns arising. Safeguarding is proactive and preventative response designed to prevent child abuse.
3	Child Protection	Is the term used to describe the responsibilities and activities undertaken to prevent harm. It is a reactive response to prevent further abuse or neglect when a specific concern has been identified. In the context of KYUEM, the term ‘child’ is referred to as ‘student’ and is in alignment and compliance to the UNCRC.
4	Child	The UN Convention on the Rights of the Child of 1989 defines more precisely the term “child”: “[...] a child is any human being below the age of eighteen years, unless under the law applicable to the child, majority is attained earlier” The idea, through this definition and all the resources concerning child welfare, is that the child is a vulnerable human being with rights and dignity.
5	Child abuse	Child abuse is a generic term encompassing all acts involving ill treatment of children resulting in serious physical, emotional, and sexual assaults as well as cases where the standard of care does not adequately support the child’s health (neglect). Children may be abused or neglected through the infliction of harm or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting, online and offline settings and has often been found to be the case. However, there are instances when the perpetrator may not be known to the child.
6	Grooming	Grooming occurs when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation, or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know – for example a family member, friend or professional.
7	Emotional abuse	Also known as psychological abuse. Emotional abuse is the ongoing emotional maltreatment. It can involve deliberately trying to scare or humiliate a child or young person. It can also involve isolating or ignoring a child. Emotional abuse often happens at the same time as neglect or other abuse. Examples include intimidation, coercion, ridiculing, harassment, treating an adult like a child, isolating an adult from family, friends, or regular activity, use of silence to control behavior, and yelling or swearing which results in mental distress.

8	Physical abuse	<p>Physical abuse happens when injury is inflicted by an adult. An act would be categorised as “physical abuse” if done intentionally or with conscious/unconscious intent to injure the child. This harm is not accidental.</p> <p>Any physical abuse can have serious consequences for children as they grow up and can cause long lasting harm. Some examples include slapping, pinching, choking, kicking, shoving, or inappropriately using drugs or physical restraints, beating, poking, pinching, gripping hard and scratching. Injuries which may be associated with physical abuse include bruises, scratches, brain damage, bleeding, and in severe cases can result in death.</p>
9	Sexual abuse	<p>The age of sexual consent in Malaysia is 16. Below that age, the law of Malaysia states a young person cannot consent to sexual acts. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether the child is aware of what is happening. The activities can include acts such as kissing, touching, or fondling the child’s genitals or breasts, vaginal or anal intercourse or oral sex.</p> <p>Examples include unwanted touching, rape, sodomy, coerced nudity, sexually explicit photographing. They may include non-contact activities, such as children looking at, or being involved in the production of pornographic material or watching sexual activities.</p>
10	Neglect	<p>This is the persistent failure to meet a child’s basic physical and/or psychological needs. It is likely to result in the serious impairment of the child’s health or development. Neglect may happen during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer: not providing adequate food and clothing; shelter, including exclusion from home; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision including the use of inadequate care- takers; or the failure to ensure access to appropriate medical care or treatment. It may also include a <i>failure</i> to meet a child’s basic emotional needs. Examples include not providing basic items such as food, water, clothing, a safe place to live, medicine, or health care.</p>
11	Bullying	<p>This can be defined as deliberately hurtful behaviour. It is usually repeated over a period of time and occurs where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical, verbal, and emotional.</p> <p>The damage inflicted by bullying can often be underestimated. Bullying can cause significant distress to children so much, so it affects their health and development.</p> <p>If you are concerned about a young person or vulnerable adult, speak to your designated safeguarding officer.</p>

12.	Crushes and Infatuations	<p>A crush is defined as a brief but intense infatuation for someone, especially someone inappropriate or unattainable. Infatuation is defined as an intense but short-lived passion or admiration for someone or something.</p> <p>Indicators that a student may be experiencing a crush or infatuation include trying to get time alone with the staff member, gain attention to get more time with the member of staff or breaking rules to gain time with the member of staff.</p>
13.	Self-harm	<p>The most common form of self-harm is using a sharp object to cut one's skin. Other forms include behaviour such as burning, scratching, or hitting body parts.</p>
14	Best Interest of the Child	<p>“Best Interest of the Child” Article 3 of the UNCRC states that “the best interest of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children.</p> <p>When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers”.</p>

Appendix 2: Guidelines for dealing with disclosures:

Guidelines for Dealing with Disclosures		
Before	Put the student first	<ul style="list-style-type: none"> Remember that the student's welfare and interests must always be the paramount consideration and assure confidentiality.
During	Listen	<ul style="list-style-type: none"> Listen carefully and actively to the student. At this stage there is no necessity to ask questions. Let the student guide the pace. Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse.
	Stay calm	<ul style="list-style-type: none"> Do not show shock at what you are hearing. This may discourage the student from continuing their disclosure as they will feel that the adult receiving the information is unable to cope with what they are hearing and may be thinking badly of the student.
	Ask Open Questions	<ul style="list-style-type: none"> Do not investigate. If you need to clarify what is being said and whether the student is at risk, ask open questions (TED: Tell, Explain Describe, ask what, when, who, how, where and do you want to tell me anything else? etc.) but only to the point of clarification being achieved. Avoid the question 'why?' as this can imply guilt/responsibility on the student.
	Go slowly	<ul style="list-style-type: none"> Stay calm and reassure the student that they have done the right thing in talking to you.
	Never promise confidentiality	<ul style="list-style-type: none"> Never make a promise that you will keep what is said confidential or secret or that "it will get better after this" – if you are told about abuse you have a responsibility to tell the right people to get something done about it. If asked, explain that if you are going to be told something very important that needs to be sorted out, you will need to tell the people who can sort it out, but that you will only tell the people who absolutely must know to keep the student safe. If a student requests confidentiality, use a 'prepared' response, such as 'I'm really concerned about what you have told me, and I have a responsibility to help ensure that you are safe. To help make sure you are safe, I must tell someone (name person) who will know how to help us to do this'. Make sure the student understands what will happen next with their information.

	Active Listening and Appropriate Questioning	<ul style="list-style-type: none"> Do not ask leading questions that might give your own ideas of what might have happened (e.g., “did he do X to you?”) – just ask “what do you want to tell me?” or “is there anything else you want to say?” or “mirror questions”: A student says “He touched me..” and the mirror questions will be “He touched you?”. This enables the child disclosing to be prompted to tell you more.
	Make notes	<ul style="list-style-type: none"> Write brief notes of what they are telling you while they are speaking (these may help later if you have to remember exactly what was said) – and keep your original notes, however rough and even if you wrote on the back of something else (it’s what you wrote at the time that may be important later – not a tidier and improved version you wrote up afterwards). If you don’t have the means to write at the time, make notes of what was said or observed as soon as possible afterwards.
	Body Map	<ul style="list-style-type: none"> If you have seen bruising or an injury, use a body map to record details (by sketching or drawing where harm is evident). Again, ensure that the map is dated and attached to information relating to the students’ comments about the injury.
	Seek Help	<ul style="list-style-type: none"> Tell your DSL as soon as possible but do not ask the student to repeat what they have told you to another staff member. This is stressful for the student. The more times a student is asked to tell their story the greater the chance of the facts becoming lost and any subsequent investigation being compromised as a result. Tell the student what will happen next; and immediately after receiving the disclosure, report the disclosure using the safeguarding log.
	Do not gossip	<ul style="list-style-type: none"> Do not gossip to other staff about what you have heard. The information should remain confidential to those who ‘need to know’. These people must be identified for clarity.
After	Stay in touch with the child	<ul style="list-style-type: none"> Maintain contact with the student. They have trusted you enough to ‘tell’, will need to know that they are not rejected as a result and may need continued support.
	Seek help for yourself	<ul style="list-style-type: none"> Ensure that you have support for yourself in managing the information you have received.

Note to consider:

Never think abuse is impossible in the college, or that an accusation against someone you know well is wrong. Always adopt the mindset that “it can happen here”.

At times students often disclose about abuse to their peers, it should therefore be ensured that all students are aware of the Student Safeguarding Policy, and the people they can talk

to when they are worried.

Appendix 3: 4 Rs of Reporting

The 4R's of Safeguarding Children is professional practice for how staff can recognise, record, report and refer in the situation of child abuse:

The 4 R's

- Recognize - the signs and symptoms of abuse and neglect
- Respond - effectively to the voice of the child
- Record/refer - child protection concerns
- Report - to relevant authorities

If a child discloses concerns to KYUEM or staff personally witness any incident or are told about concerns from someone else, staff are to practice the 4R's of Child Protection & Safeguarding.

These are examined in detail:

4 Rs of Child Protection				
	Recognise	Respond	Report	Record
First Thing to Do	<p>RECOGNISE the protection or safeguarding concern.</p> <p>RECOGNISE what abuse is, what to look out for and be always vigilant.</p>	<p>RESPOND to possible concerns. (Not all children inform someone what is happening to them, so if you see or hear anything that could be a concern for them, you must respond quickly.</p>	<p>REPORT to The DSL.</p> <p>If the student is in immediate danger (urgent in nature) contact the School Principal immediately.</p>	<p>RECORD your observations using TED Tell: "Tell me what you mean by that?", "Tell me how that made you feel?".</p> <p>Explain: "Can you explain to me what happened that night", "Explain what you would like to happen now that you have told me.</p> <p>Describe: "Can you describe what you were thinking and feeling", "Describe why you feel like that".</p>

**Signs &
Symptoms to
Look out for**

Change in the child's behaviour – e.g., becoming disruptive or unreasonable.

- Anxiety, lack confidence or are withdrawn and stop communicating.
- Begin bullying like behaviours/attention seeking behaviours.
- Have unexplained cuts and bruises or bite marks.
- Self-harming or eating disorder.
- Hiding physical injuries.
- Seem afraid of parents or care givers.
- Are frightened to say what is wrong.
- Have been asked to hide something or keep a secret online.

React calmly so as not to frighten the student.

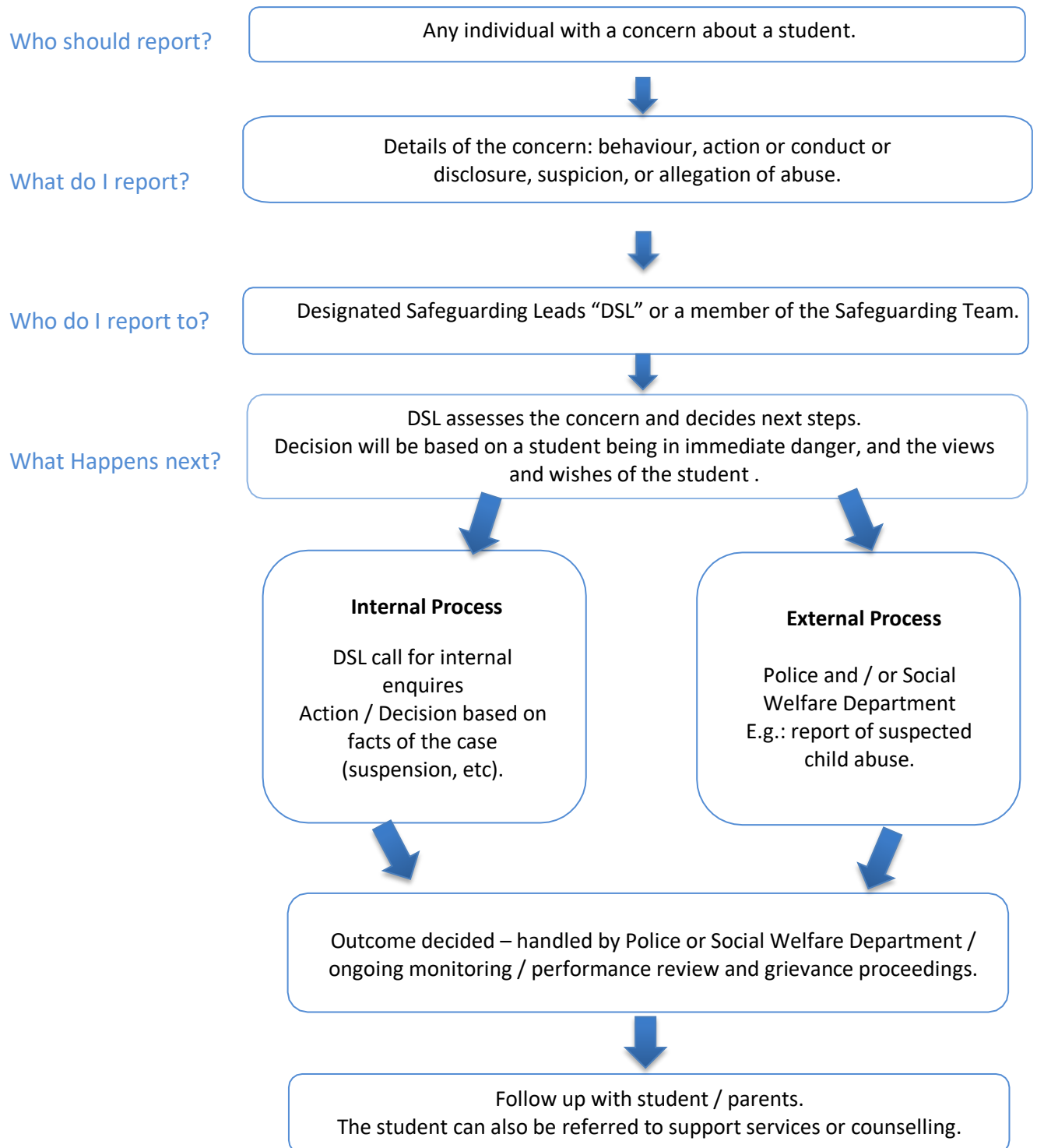
- Listen to what they say and do not show disbelief or disgust.
- Reassure them they are not to blame and were right to tell you.
- Avoid stopping them to go and get someone else.
- Let them speak.
- Avoid asking too many questions, just gather basic questions, who, where, when.
- Don't give personal viewpoints.
- Don't promise to keep it a secret, be clear that this is important, and you have to tell someone else.
- Reassure them they are not in any trouble.

The child's name, date of birth.

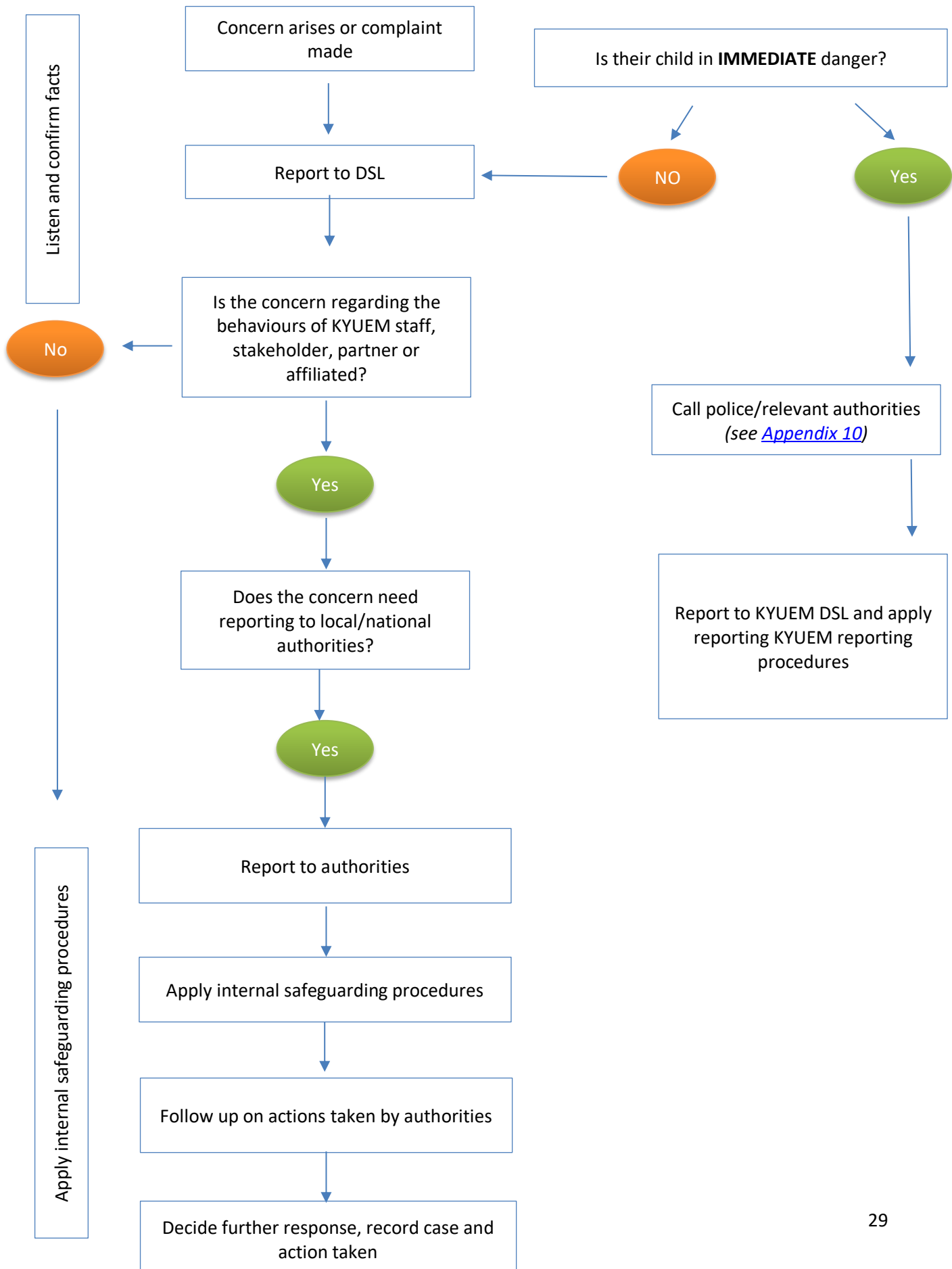
- When they made the disclosure (date/time/where).
- Whether the student told you about their concern or about someone else.
- Use the students' own words – do not edit- verbatim notes are key to investigation and later used as evidence.
- What the concern is.
- Description of any visible injuries, behaviours – do not examine the student.
- Details of any witnesses.
- What the students' view is – bear in mind the abuse may be something the student is not conscious of (it could be normal to them).

Appendix 4: Reporting Procedures Flowchart

Flow Chart Representation of Reporting



Appendix 5: Reporting Structure for High Level Concerns



Appendix 6: Reporting Abuse

For **immediate danger** where the life of a child may be at stake and immediate action is needed, these agencies can be contacted for next steps:

1) Via Talian Nur – Dial 15999 or WhatsApp 019-2615999 to seek help and emotional support. The Women, Family and Community Development Ministry is taking all calls received via its Talian Kasih hotline seriously, including issues concerning domestic violence and child abuse. The ministry's Social Welfare Department is committed to taking immediate action (against the perpetrators) in accordance with the Child Act 2001 and Domestic Violence Act 1994. When making a report you should be ready to give the following information:

- Name of child
- Location/Address
- Reason for suspicion
- Your name and contact

2) Via Hospital

Take the child to the nearest hospital and report to the Emergency Department/ Outpatient Department that you suspect the child has been abused.

3) Via Police

Make a police report on the suspected abuse, or call 999 Mandated Reporters

Under the Malaysian law, Child Act 2001, doctors, members of the family and child care providers are mandated to immediately report children suspected to be physically or emotionally injured as a result of being ill-treated, neglected, abandoned or exposed, or is sexually abused to the Protector Jabatan Kebajikan Masyarakat (Social Welfare Department) which takes on the role of a protector.

Should doctors, members of the family and child care providers not comply with the reporting they can be liable to a fine not exceeding RM5000 or to imprisonment for a term not exceeding two years or both (Child Act 2001, Section 27-29).

Teachers, counsellors and the general public should also report child abuse should the child divulge the abuse to them even though they are not mandated to do so. They can make a report to the police.

Further Information about Malaysia Law can be found in the Malaysian Federal Gazette: <http://www.federalgazette.agc.gov.my/>


Appendix 7: List of Support Agencies

There are three agencies primarily involved in child protection procedures, which are the Police Departments, Government Hospitals and the Social Welfare Department. Over the past two decades, a range of initiatives have been undertaken around policies, programs and activities associated with Child Protection in Malaysia. Some of the initiatives taken are the most prominent agencies dealing with child abuse in Malaysia including:

Organisation	Description	Telephone No.	Website
Jabatan Kebajikan Masyarakat Malaysia / The Suspected Child Abuse and Neglect Team (SCAN Team)	Establish Child Protection Team (CCPC) to provide child protection services	1-800-88-3040	www.jkm.gov.my
UNICEF Malaysia	Advocate child protection from violence, exploitation, and abuse	15999	mlya@unicef.org
Ministry of Women, Family and Community Development (MWFCDD)	Government agency that oversee family and community development (setup Talian Kasih)	603-8000 8000	www.kpwkm.gov.my
Talian Kasih	Contact number to seek help or counselling on social issues	SMS 15999 WhatsApp 019-2615999	www.kpwkm.gov.my
Malaysian Communications and Multimedia Commission (MCMC)	Promote positive use of internet by adhering to the Child Protection legislation on multimedia	03-8688 8000	www.mcmc.gov.my
SUKA Society	Provide welfare and community development programmes	03-78774227	www.sukasociety.org
Malaysian Association for the Protection of Children (MAPC)	Advocate child rights and protect children from abuse and neglect	03-26942362	mapcorg@po.jaring.my

P.S. The Children	Build a safer community where children are protected from sexual abuse and exploitation	016-227 3065 016-721 3065	www.psthechildren.org.my
Humankind (Buddy Bear)	Provide children who are experiencing emotional distress with counselling for emotional support	1800-18-BEAR 1800-18-2327	https://www.humankind.my/
Woman's Aid Organisation (WAO)	Provide free crisis support and shelter to women and children who face abuse. WAO is the largest service provider for domestic violence survivors in Malaysia	603 3000 8858 +6018 988 8058 SMS/WhatsApp p TINA	https://wao.org.my/

Appendix 8: Safeguarding Form for Recording Disclosures (High Level Concern)

 Safeguarding Form for Recording Disclosures (High Level Concern)	
Date of disclosure:	Date form completed:
Time of disclosure:	Time form completed:
Student name:	Name of person completing form:
Student ID number:	Position of person completing form:
Student House:	Name of DSL:
Student date of birth:	Time when DSL receive form:
Nature of Concern/Disclosure Fill in useful information about the concern (such as what, where, when, who), description of the perpetrator or suspect (colour of clothes, vehicle registration number, etc.) Please include where you were when the child made a disclosure, what you saw, who else was there, what did the child say or do and what you said (quote exact words if possible). Continue onto an additional sheet if necessary. Any notes should be attached to this form. Use Body Map to indicate the exact position and type of any injuries or marks seen.	
Was there an injury? Yes / No	Did you see it? Yes / No
Describe the injury:	
Was anyone else with you? Who?	
Has this happened before?	Did you report the previous incident?
Do parents know this report is being completed? Yes / No	
Your signature:	

Action taken by DSL including discussion with Safeguarding Committee:

Referred to...?

☐ college Counsellor

☐ Nurse

☐ Outside Agency:

Date:

Time:

Parents informed?

☐ Yes

☐ No (if no, state reason)

Feedback given to...?

☐ Child

☐ Person who recorded disclosure

☐ Pastoral Care Teacher

☐ Student Affairs Head

☐ Principal

☐ Others

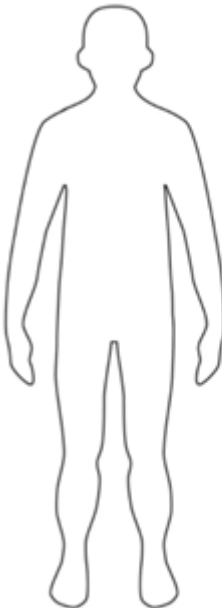
Further action agreed:





Full name:



DSL signature:

Date:	
Date of disclosure:	Date form completed:
Time of disclosure:	Time form completed:
Student name:	Name of person completing form:
Student ID number:	Position of person completing form:
Student House:	Name of DSL:
Student date of birth:	Time form taken by DSL:

Body Map




Notes:

Appendix 9: Safeguarding Concern Form (Low Level Concern)

 <p>KOLEJ YAYASAN UEM</p>		<h2>Safeguarding Concern Form</h2>	
<p>Use this form to record any safeguarding concern, however trivial. Forward it immediately to the DSL. Answer every question; continue a blank sheet if necessary.</p>			
Report ref no. (DSL to complete)			
Details of person at risk			
Name of person		DOB:	
Student ID Number			
Student ID			
About You (the person filling in this form)			
Your name		Job title	
Service		Date	
About the safeguarding concern			
Are you reporting your own concern or one raised by someone else?			
If you are raising a concern made by someone else, please provide their full name, status and contact details			

<p>Please provide details of the concern you have including dates, times, descriptions of events, full names and whether the information is first hand or the accounts of others</p>	
<p>The person at risk's account (if applicable). <i>Include what they want the outcome to be</i></p>	
<p>Provide details of the person causing harm (if known)</p>	
<p>Provide details of any witnesses to the concern</p>	
<p>Provide details of any previous incidents or concerns relating to this person (if known)</p>	

Actions: State the actions you took immediately

--

Person Contacted

*You must pass this form **immediately** to the DSL. You should only contact authorities outside KYUEM to deal with an **immediate danger scenario** (for example, police or ambulance service).*

Give details below of any people outside of KYUEM that you have communicated this concern to – give name, position, contact details, and the date and time that you contacted them:

--

Declaration Form: I have completed this form to the best of my knowledge

Signature	
-----------	--

Appendix 10: Safer Recruitment Checklist

Safer recruitment checklist

This safer recruitment checklist is designed to help employers follow a clear process when recruiting for a role. It covers the whole process including recruitment, job applications, interviewing and the post-application follow-up. This checklist is aimed at roles which involve safeguarding adults or children.

Activity	Currently in place Yes/No	Recommended action
Ensure job descriptions, person specifications and application forms are clear, use plain English where possible and reflect the requirements of the role and the organisation's commitment to safeguarding.		
Send candidates information about the values of the organisation and the associated expected behaviours.		
Send candidate's information on the level of criminal record check required and at what point in the recruitment process disclosure is required.		
Assess candidates using a range of selection methods where possible – including values-based recruitment. Probe their attitudes and values towards people who need care and support.		
Ask shortlisted candidates to complete a criminal record self-declaration stating any cautions and/or convictions appropriate for the role applied for		
Apply for the appropriate level of criminal record check after a conditional job offer has been made.		
Check the identification and right to work documents and qualifications, if relevant, of every applicant. Only accept originals.		
Take up all available references on short-listed applicants. Check for gaps and any inconsistencies between information given on the application form, and that provided by the references. Telephone to confirm reference receipt and follow up any queries.		
Carry out a risk assessment on an applicant, if concerns arise from a criminal record or allegation information contained on a criminal record certificate.		
Make all appointments subject to a probationary period.		

Highlight safeguarding responsibilities and set clear expectations of acceptable behaviour and boundaries of their role during staff induction.		
Ensure staff have the relevant induction and training		
Ensure a culture of vigilance and have clear policies and procedures in place which explain what staff, and people who need care and support, should do if they have concerns about the behaviour of another member of staff.		
Respond quickly and appropriately to any allegations about the behaviour of a member of staff, in particular concerning behaviour towards a child or adult at risk.		

Safer Recruitment Checklist modified from: Skills for Care, Partnership, 'Safe and Fair Recruitment', December 2020