Date: August 2025
Review Date: August 2026

Responsibility: Deputy Headteacher Pastoral

CHILD PROTECTION & SAFEGUARDING POLICY

Our Policy

The College recognises that all adults, including governors, teachers and support staff, whether full-time, part-time or temporary, employed or volunteer, have a full and active part to play in protecting our pupils from harm, and that children's welfare is always of paramount concern. The College should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child. In considering abuse, all staff are encouraged to be alert to the fact that "it could happen here".

Designated Safeguarding Leads:

- Mrs Kate Fowler (Deputy Headteacher, Pastoral) - DSL
- Dan Long (Head of Boarding) - DDSL
- Mrs Jane Rouson (Head of Prep) - DDSL
- Mark Eyton-Jones (Prep Pastoral and Wellbeing Leader)- DDSL
- Jennifer Garnett - (Assistant Headteacher Pastoral) - DDSL
- Child Protection Governor: Mr Francis Minah

Safeguarding Committee:
Chairperson - DSL - Kate Fowler
Dan Long (Head of Boarding) - DDSL
Jane Rousen/Mark Eyton Jones - representatives from the Prep School - DDSL
Pajan Kaur - School Counsellor

- the public interest in safeguarding the child's welfare overrides the need to keep the information confidential; or
- disclosure is required by law or under an order of court.

All staff must be aware that they can not promise a child to keep secrets that might compromise the child's safety or well-being. In deciding whether there is a need to share information, **the pupil's best interests must be paramount**.

The College will always undertake to share the intention to refer a child to the relevant welfare services with the child's parents or guardians unless to do so could put the child at greater risk of harm

Introduction

This policy has been developed in accordance with the principles established by relevant Malaysian and UK legislation, guidance, and best practice, including:

- Malaysian Child Act 2001 (Act 611);
- Malaysian National Child Protection Policy (2009);
- UK Children Acts (1989 and 2004);
- UK Education Acts (2002, 2006 and 2011);
- UK Equality Act (2010);
- *Working Together to Safeguard Children* (most recent update);
- *What to Do if You Are Worried a Child is Being Abused* (latest guidance);
- *Keeping Children Safe in Education* (most recent update);
- National Minimum Standards for Boarding Schools (UK, 2022 update).

Epsom College Malaysia recognises its duty of care and responsibility to safeguard and promote the welfare of all children in its care. The Board of Governors takes seriously its obligations under relevant legislation and works in partnership with parents, guardians, and external agencies to ensure robust arrangements are in place to identify, assess, and support children who are suffering, or are likely to suffer, harm. This includes proactive measures to support children with additional needs.

The aims of this policy are:

- To support every child's development in ways that promote security, confidence, and independence.
- To ensure that pupils' voices are valued and heard, and that all staff actively listen to children.
- To create and maintain an environment in which children feel safe, secure, valued, and respected, and in which they are confident — and know how — to seek help if they are in difficulty.
- To raise the awareness of all teaching, boarding, and support staff of their safeguarding responsibilities, including recognising signs of abuse, providing early help, and following clear reporting procedures.
- To establish a systematic approach to monitoring and supporting children known or thought to be at risk of harm, and to contribute to multi-agency assessments and support plans.

- To ensure open and effective communication between all members of staff on safeguarding matters.
- To maintain a clear, structured procedure to be followed in cases of suspected abuse or concern for a child's welfare.
- To develop and maintain effective working relationships with relevant agencies, both in Malaysia and, where appropriate, in the UK.
- To ensure that all adults working with or living alongside children in the College have been appropriately vetted for their suitability to work with children and have received induction and ongoing training in safeguarding and safe practice.

Guiding Principles

The College will ensure that:

- all members of the Board of Governors understand and fulfil their responsibilities;
- it has a designated Governor who monitors the College's child protection procedures;
- it has a designated senior member of staff — the College's Designated Safeguarding Lead (DSL) — who has undertaken Designated Safeguarding Lead training or similar, and who undertakes other training as necessary, including refresher training at two-yearly intervals;
- it has at least one other senior member of staff who will act in the designated member of staff's absence, who will also have undertaken the Safeguarding Children Training, updated at two-yearly intervals;
- all members of staff are familiar with the procedures to be followed at the College when a suspicion or allegation of abuse or neglect of a child is first encountered[1];
- the Headteacher and all members of staff undertake training in child protection & safeguarding delivered in school by the DSL (or a designated deputy), to develop their understanding of the signs and indicators of abuse and to equip them with the knowledge and skills necessary to fulfil their responsibilities for safeguarding children;
- such knowledge and skills are to be kept up to date by means of refresher training delivered annually by a briefing to ensure the College's procedures are known, and more thoroughly at a minimum of three-yearly intervals;
- all new members of staff, regular volunteers and Governors are given a copy of the College's Child Protection & Safeguarding Policy, which contains the school's own arrangements and the names of key safeguarding leads as part of their induction into the school;

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- temporary members of staff who may have contact with our pupils are also given safeguarding training and the names of the key safeguarding leads and guidance on appropriate conduct in school;
- all members of staff, volunteers, and Governors know how to respond to a pupil who discloses abuse, or to information received from any source indicating that a child may be at risk of harm;
- all parents and guardians of pupils at the College are made aware of the responsibilities of staff members with regard to child protection & safeguarding procedures through publication of the College's *Child Protection & Safeguarding Policy*, which is available on request (and via the College website) to parents and guardians of current pupils, and parents of prospective pupils.
- community users and others who organise activities for children are aware of the College's safeguarding guidelines and procedures;
- its selection and recruitment of staff include checks for their suitability for work with children with the Disclosure and Barring Service DBS, and any member of staff found not suitable to work with children, following referral to the Local Authority Designated Officer, DG, will be reported to any relevant professional body and the Disclosure and Barring Service DBS for consideration for permanent disqualification from working with children; and
- organisers of off-site visits and tours confirm as part of their planning and preparation that all staff working at establishments being visited who could have unsupervised contact with children have had the necessary checks carried out.

This policy and the procedures set out within will be reviewed and updated annually.

Any deficiencies or weaknesses in the College's child protection and safeguarding arrangements will be remedied without delay.

The Board of Governors, taking into account an annual report on all child protection matters prepared for them by the DSL, will undertake an annual review of the College's policies and procedures concerning the safeguarding of its pupils to ensure that all responsibilities related to this aspect of the school's governance have been discharged.

The role of the Designated Safeguarding Lead

The College's DSL is responsible for:

- acting as a source of support, advice and expertise for staff and others to discuss concerns about possible abuse to children;
- promoting and supporting the provision of early help and intervention where concerns have not reached a child protection threshold, using early help assessments where appropriate;
- co-ordinating referrals of a child for whom there are concerns, to the relevant outside agencies;
- ensuring that a referral is made as soon as possible, and within 24 hours of any allegation being made;
- emailing a written record of the referral, and following up for a response or more action where necessary;

- keeping written records, through CPOMS, of concerns about a child even if there is no need to make an immediate referral
- ensuring that all such records are kept confidentially and securely and CPOMS and are separate from pupil records as per National Minimum Boarding Standards;
- liaising with other agencies and professionals;
- encouraging a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them;
- reviewing and updating the College's Child Protection & Safeguarding Policy in line with changes in legislation and recommended 'best practice' procedures;
- keeping the Headteacher informed of issues especially enquiries under section 47 Children Act 1989 and police investigations; and
- providing, in consultation with the Headteacher, an annual report for the Educational and Pastoral Committee of the Board of Governors, detailing any changes to the policy and procedures, training undertaken by the DSL, and by all staff and governors, the number and type of incidents and cases, and the number (but not names) of children with child protection plans.

It is accepted that once a referral relating to actual, alleged or suspected abuse or neglect of a child, or to any other concern, has been accepted, decisions about further action will be made by the police or local welfare services) and not by the College without consultation with those agencies.

Recognising Abuse or Neglect

All members of staff must remain vigilant to the possibility that any pupil may be subject to abuse or neglect. This abuse could be perpetrated by:

- Parents, siblings, other relatives, guardians, carers, friends, acquaintances, strangers, or
- Members of the College community, including staff and fellow pupils.

Abuse or neglect may be the result of deliberate acts or failures to act to prevent harm, and can occur in both face-to-face and online contexts. It can take many forms. The definitions below are adapted from *Working Together to Safeguard Children* (UK, latest version), *Keeping Children Safe in Education* (KCSIE, 2025), and Malaysian statutory guidance.

- **Emotional abuse** is the persistent ill-treatment or rejection of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capacity, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel

frightened or in danger; or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

- **Physical abuse** is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

- **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the Internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse as can other children.

- **Neglect:** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

    - provide adequate food, clothing and shelter (including exclusion from home or abandonment);
    - protect a child from physical and emotional harm or danger;
    - ensure adequate supervision (including the use of inadequate care-givers);
    - ensure access to appropriate medical care or treatment; or
    - it may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Abuse can occur in a variety of circumstances and across all socio-economic groups. Children may be particularly vulnerable where there is a history of family violence, bullying, drug or alcohol abuse, mental health problems, learning difficulties or unemployment. Identification of abuse is rarely straightforward because indications often comprise a complex mixture of medical symptoms, behavioural characteristics and background factors.

The following characteristics in the pupil can be indications of potential abuse:

- unexplained or unusual injuries (e.g. in inaccessible sites like the neck, behind ears, on the soles of feet);
- cuts, bite marks, scalds or bruising;
- apparent age of injuries not being consistent with account given;
- evidence of injuries being repeated;

- evidence of poor overall care and a failure to thrive (e.g. pupil appears dirty and unkempt);
- swallowing harmful substances or consuming inappropriate food or drink;
- evidence of self-harm or self-mutilation;
- unexplained deterioration in performance at school;
- evidence of sexual activity that is inappropriate for the pupil's age; or
- behavioural or sudden changes in behaviour (e.g. aggression, hyperactivity, nervousness, social withdrawal).

It must be emphasised that the presence of one or more of these characteristics can only indicate (and not confirm with any certainty) that abuse may have taken place. Behavioural problems, for instance, are often associated with other conditions.

The conduct of parents can also be indicative. Inconsistent explanations of their child's injuries, a lack of concern for or general detachment from their child's problems, a refusal or reluctance to allow treatment or discuss problems, and displays of aggressive behaviour towards their child should all alert staff to the possibility of abuse or neglect.

The College recognises that children can be vulnerable to abuse by their peers that falls outside the category of mistreatment that would be dealt with as an incidence of bullying. Such abuse will be taken as seriously as abuse perpetrated by an adult. Staff should be alert to the difference between consenting (appropriate) and abusive (exploitative) peer relationships. They should not readily dismiss abusive sexual behaviour between young people as 'normal' and should not develop high thresholds before reporting such behaviour to the children's Housemasters/mistresses or the DSL.

Action to be taken when abuse is suspected

A teacher or other member of staff — acting on personal observation or knowledge or in response to an allegation — who has good reason to suspect that a pupil has been abused or neglected in any of the ways described above, or who harbours any other concern for a pupil's well-being, has a duty to report the suspicion, allegation or concern to a senior member of staff without delay and without attempting to carry out any investigation. A written summary of the concern should be added to CPOMs as soon as possible.

The senior member of staff to whom the report is made would normally be the Deputy Headteacher Pastoral acting in his/her capacity as DSL. It is accepted, however, that the instinct of a teacher or other member of staff at the College may be to discuss his or her concerns first with the pupil's Housemaster/mistress. Such a course of action would not be appropriate if any delay in referring the matter to an outside agency, including the police, might put the pupil's welfare or safety at risk or jeopardise a full and proper investigation (where, for example, there might be bruising or other signs of injury that will quickly begin to fade, and examination and diagnosis by a properly qualified expert would therefore need to be arranged urgently by the investigating agencies).

A suspicion of abuse or neglect often takes the form of a concern that can not be based on hard factual evidence. Such a concern, when discussed with the pupil's housemaster/mistress or other senior colleague, may not necessarily prompt a referral, but

may along with concerns raised by others help to create a bigger picture that suggests that the child is indeed at risk.

A teacher or member of staff approached by a pupil who "wants to tell them something" will wish to respond promptly and sympathetically but must proceed with caution;

- In the first instance, a teacher or any other member of staff directly involved has a duty to listen to the pupil.

- **Absolute confidentiality**, whether specifically requested by the pupil or not, **should never be promised** since it cannot be guaranteed. If necessary, it must be made clear at an early stage in the conversation that any duty of confidence would not prevail over the duty to act on information provided by the pupil if such information suggests, for example, that the welfare or safety of the pupil or any other person is at risk. If at all possible, the pupil's express consent for further consultation should be obtained, but in any event the reassurance can and should be given to the pupil that information will only be passed on to those **who absolutely have to know**.

- If the pupil decides not to proceed with the conversation he or she should be encouraged to talk to someone else. This could be internally with the school counselor or other trusted adult or externally.

- If the conversation initiated by the pupil involves any disclosure or allegation of a serious nature, notes should be made as fully and as quickly as possible, including actual words used where appropriate, and a consultation with the DSL secured without delay.

- The role of the adult or adults present is to listen, to reassure and, if necessary, to take a written statement as a record of the conversation. They should not probe, ask leading questions, put words into a pupil's mouth nor become involved in any form of medical examination. Misguided intervention can jeopardise a police investigation and impede later criminal proceedings.

- When the conversation has ended, any further comments or observations should be recorded straight away. The value at any subsequent enquiry or in legal proceedings of notes made contemporaneously cannot be overemphasised.

The Deputy Headteacher Pastoral acting in his/her capacity as DSL will ensure that statements and any other relevant records that may be required as evidence are maintained and kept securely. These may be required by the welfare services or the police. (Information relating to actual, alleged or suspected child abuse is exempted from the provisions regarding the disclosure of pupil records.)

The DSL, having received a report from a member of staff about actual, alleged or suspected abuse or neglect of a pupil or other major concern for the pupil's welfare, may in certain circumstances proceed in a way that does not have the full support of the reporting member of staff; (where, for example, the DSL is privy to sensitive and confidential information relating to the pupil). In such cases the reporting member of staff should discuss his or her

concerns with the Headteacher and is in any event at liberty to contact directly the relevant welfare service if they still have concern, but feel the DSL is not going to refer.

In all but inconsequential cases — such as those involving an allegation that is demonstrably false or unfounded — the Headteacher will be informed.

Key Points

All teachers and other members of staff must:

- be alert to the possibility of abuse or neglect;
- be able to recognize and act upon indications that a pupil's welfare may be at risk;
- know who to contact to discuss or express concerns about a child's welfare;
- be prepared to listen sympathetically to a pupil who wants to discuss a sensitive issue;
- not promise absolute confidentiality;
- not ask leading questions or put words into a pupil's mouth;
- not attempt to investigate suspicions of abuse or neglect or carry out any form of medical examination;
- complete a written record of any disclosures by a child, or concerns that have, and make these available to the DSL on CPOMS or by submitting a hard copy to the DSL directly;
- report concerns about or knowledge of actual, alleged or suspected abuse or neglect to the DSL immediately. If the complaint is against the DSL the concern should be reported directly to the Headmaster;
- report allegations involving a member of staff to the DSL or Headmaster immediately;
- only pass on information to others on a 'need to know' basis; and
- feel at liberty to make an external referral, if necessary. See *'Appendix 1'* for contact details of external agencies.

Supporting Children

The College recognises that a child who is abused or witnesses violence may feel helpless and humiliated, may blame him/herself, and may find it difficult to develop and maintain a sense of self-worth. The behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or being withdrawn.

We recognise that the College may provide the only stability in the lives of children who have been abused or who are at risk of harm.

The College will support all pupils by:

- encouraging self-esteem and self-assertiveness — through the curriculum as well as through relationships between staff and pupils and between pupils themselves, whilst not condoning aggression or bullying;
- using opportunities in PSHE and throughout the curriculum to make pupils aware of risks, and promote their ability to keep themselves safe. This includes sex and relationships advice, and e-safety for example;
- promoting a caring, safe and positive environment within the College;

- offering a confidential counselling service to our pupils, contactable directly by them, our counsellors working within this child protection policy with regard to sharing information with the DSL where necessary;
- liaising and working together with all other support services and those agencies involved in the safeguarding of children;
- notifying welfare services as soon as there is a significant concern; and
- providing continuing support to a pupil about whom there have been concerns who leaves the school by ensuring that appropriate information is forwarded under confidential cover to the pupil's new school and ensuring the school medical records are forwarded as a matter of priority.

Confidentiality

The College recognises that all matters relating to child protection are confidential.
Anyone concerned with a suspected case of abuse should treat all personal information as confidential, taking particular care when dealing with sensitive information relating to the child and the child's family.[2] It may sometimes be necessary for one member of staff to disclose personal information about a pupil to another member of staff, but this will only be done on a 'need to know' basis.

All staff must be aware that they have a professional responsibility to share information with colleagues and other agencies in order to safeguard children. Legal and professional obligations will not generally prevent the sharing of confidential information if:

- the pupil and/or the parent consent to the disclosure;
- the disclosure is required by law, is necessary to protect the welfare of the child, or is necessary to prevent a crime, or would not prejudice law enforcement, or impede a criminal investigation.

Support for Staff

The College recognises that staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.
The College will support such staff by providing an opportunity to talk through their anxieties with the DSL or School Counsellor and seek further support as appropriate.

Allegations against Staff

All College staff must follow the College's 'Guidance for Staff' at all times. They should take care not to place themselves in a vulnerable position regarding their work with pupils in both formal and informal settings. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults where possible, or to notify a senior member of staff if a one to one session is planned. Communication with pupils and

[2] Guidance on the sharing of information can be found in *What to do if you're worried a child is being abused*, and in *Information Sharing – Advice for practitioners providing safeguarding services to vulnerable children, young people, parents and carers DfE*

parents, by whatever means including those that make use of modern technology, should take place within professional boundaries. Pupils should never for example be accepted as 'friends' on social networking sites, and where pupils are already known to a member of staff in a family or outside friendship connection, this should be made clear to the person's senior manager. Subject matter of a personal nature should be avoided. Staff should be circumspect in their communications with pupils to avoid any possible misinterpretation of their motives or behaviour that could be misconstrued. All staff should be familiar with the College's guidelines. Volunteers who work with pupils (for example, parents accompanying an off-site visit or tour) are expected to maintain standards of conduct comparable to those prescribed for employed members of staff.

It is understood that a pupil may make an allegation against a member of staff or volunteer, or information may come to light raising a concern about a member of staff or volunteer's suitability to work with children . If such an allegation is made, whoever receives the allegation, whether directly from the pupil or via a third party, will immediately inform the Headteacher.

If the Headteacher receives an allegation indicating that a member of staff or any other adult working with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

Allegations of abuse made against staff, whether historical or contemporary, should be handled by the Headteacher and not by the DSL (if the allegation is against the Headteacher then the person receiving the allegation should immediately inform the Chair of Governors, without notifying the Headteacher first).

When an allegation of abuse is made against staff, it is referred **directly** to the relevant external agency (See Appendix 1) and their advice followed. This initial conversation will establish the validity of any allegation and if a formal referral is needed, then contact will be made within 24 hours with the relevant local agency. If this is the case a strategy meeting will be called that the Headteacher/Chair of Governors should attend.

The decision of the strategy meeting could be:

- Police investigation if there is a criminal element to the allegation
- Single agency investigation completed by the school

The fact that a member of staff offers to resign should not prevent the allegation procedure reaching a conclusion.

It is the responsibility of the Designated Safeguarding Lead to ensure that a report is made to the Disclosure and Barring Service (DBS) within one month of leaving the school of any person (whether employed. contracted, a volunteer or student) whose services are no longer

used because he or she is considered unsuitable to work with children. For more information on making a referral:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/442338/DBS__Barring__Making_a_refferal_A5_8pp.pdf

After consultation with the relevant agencies, the parents or guardians of a child or children involved will be told about the allegation, provided the timing and content of that information has been agreed by a relevant external agency in a case where welfare services and the police are to be involved. They will be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution. Under no circumstances will a child be sent home, pending any investigation, unless this advice is given exceptionally, as a result of a Strategy Meeting.[3]

The College will also keep the member of staff or other adult who is the subject of the allegation informed of the progress of the case, following any advice about content and timing of information to be given where the police are involved, and consider what other support is appropriate for the individual. The power to suspend a member of staff is vested in the Headmaster and the Board of Governors. Suspension should not be automatic in such cases.

If the accused person resigns, or ceases to provide their services, the allegation will still be followed up in accordance with the guidance, and a referral to the Disclosure and Barring Service DBS for consideration for permanent disqualification from working with children will be made. Settlement or compromise agreements which prevent a referral being made to DBS in such an instance would be likely to result in a criminal offence being committed as the school has a legal duty to make such a referral.

Further guidance is available in Part Four of *Keeping children safe in education* DfE.

Whistleblowing

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If necessary they should speak in the first instance to the DSL or to the Headteacher, to whom they must report any concern or allegation about school practices or the behaviour of colleagues that are likely to put pupils at risk of abuse or other serious harm. The College's whistleblowing procedure is set out in full in a separate document.[4]

The College recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. Talian Kasih 15999 (formerly Childline Malaysia) posters are on

[3] The term Strategy Meeting covers any urgent formal strategy discussion which may take place by telephone between the Headteacher, the DSL, police, social care, and education managers, requiring action prior to a first meeting.

[4] Policy document: *Whistleblowing*.

display throughout the school. This is an organisation for both staff to raise concerns about pupils and also for pupils to gain advice should they wish to do so.

Physical Intervention

The College's policy on physical intervention by staff is set out separately.[5] It acknowledges that staff must only ever use physical intervention as a last resort to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder, and that at all times it must entail the minimal force necessary to prevent injury to another person.

Such events should be recorded and signed by a witness, and reported as soon as possible to the DSL so that the child's parents can be notified the same day. It must be understood that physical intervention of a nature that causes injury or distress to a child may be considered under child protection or disciplinary procedures.

Bullying

The College's policy on bullying is set out in a separate document.[6] It must be understood that serious bullying, or to allow or condone bullying may lead to consideration under child protection procedures. This includes homophobic and gender-related bullying and, indeed, all other relevant protected characteristics under the UK Equality Act 2010.

The College recognises the rapid escalation of what has come to be known as 'cyberbullying': the use of electronic communications technologies (such as e-mail, mobile phone and text messaging, digital photography, instant messaging, personal websites, chat rooms, blogs and social networking sites) to harass, intimidate, insult, abuse, embarrass or otherwise harm or cause distress to others. As with all other forms of bullying, cyberbullying is regarded by the College as totally unacceptable.

Child on Child Abuse

Epsom College are committed to the prevention, early identification, and appropriate management of child-on-child abuse (as defined below) both within and beyond the College.

This policy recognises that abuse is abuse, and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up'. The school does not use the term 'victim' and/or 'perpetrator'. This is because the College takes a safeguarding approach to all individuals involved in concerns or allegations about child-on-child abuse, including those who are alleged to have been abused, and those who are alleged to have abused their peers, in addition to any sanctioning work that may also be required for the latter. Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers.

Understanding Child-on-Child Abuse

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5 Policy document: *Use of Reasonable Force to Control or Restrain Pupils*.

6 Policy document: *Anti-Bullying Policy*

Peer abuse is behaviour by an individual or group, intending to physically, sexually or emotionally cause hurt to others. All staff should recognise that children are capable of abusing their peers. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate), friendships and wider peer associations. Child-on-child abuse can take various forms, including but not limited to:

Serious bullying (including online bullying);

Relationship abuse

Domestic violence and abuse

Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm

Child sexual exploitation, sexual violence and sexual harassment

Youth and serious youth violence

Harmful sexual behaviour, and/or

Prejudice-based violence, including but not limited to, gender-based violence.

Initiation/hazing type violence and rituals

Examples of online child-on-child abuse would include sexting, online abuse, child-on-child grooming, the distribution of youth involved sexualised content and harassment.

Stopping violence and ensuring immediate physical safety is the first priority of any education setting, but emotional bullying can sometimes be more damaging than physical bullying. Children should feel confident to report any form of abuse or neglect, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

At Epsom College we continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to the impact on that individual child's emotional and mental health and well-being. All Epsom staff should therefore be alert to and monitoring changes in students' behaviour and/or attendance and reporting any concerns to the DSL.

When managing abuse and harmful behaviour It is necessary to consider:

• what abuse is and what it looks like

• how it can be managed

• what appropriate support and intervention can be put in place to meet the needs of the individual

• what preventative strategies may be put in place to reduce further risk of harm. Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. It is important to consider the forms abuse may take and the subsequent actions required.

• Children are vulnerable to abuse by their peers. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

• Staff should not dismiss abusive behaviour as normal between young people

• Staff should be aware of the potential uses of information technology for bullying and abusive behaviour between young people.

• Child-on-child abuse may affect boys differently from girls, and this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up.

Staff should be aware of the added vulnerability of children and young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children.

Staff should also be aware that children with Special Educational Needs and/or Disabilities (SEND) are more likely to be abused than their peers without SEND, and additional barriers can sometimes exist when recognising abuse in children with SEND. These can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration, the potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment without outwardly showing any signs, communication barriers and difficulties and overcoming these barriers.

Some children may be more likely to experience child-on-child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious belief.

Recognising peer/child abuse

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff should consider where the alleged behaviour falls on a spectrum and to decide how best to respond. This could include, for example, whether it:

• involves a single incident or has occurred over a period of time,

• is problematic and concerning,

• involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability,

• involves an element of coercion or pre-planning,

• involves a power imbalance between the child/ children allegedly responsible for the behaviour and the child/children allegedly the subject of that power, and

• involves a misuse of power.

General principles It is essential that all concerns and allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our College environment. Any response should:

• include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred (as appropriate) – depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation,

• treat all children involved as being at potential risk while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, they may also have considerable unmet needs and be at risk of harm themselves. The College should ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it.

• take into account: – that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address the effect of wider sociocultural contexts – such as the child's/ children's peer group (both within and outside the College); family; the College environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence.

Consider what changes may need to be made to these contexts to address the child/ children's needs and to mitigate risk, and – the potential complexity of child-on-child abuse and of children´s experiences, and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting, – the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/ children and their parents, and obtain consent to any referral before it is made. The College should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. It is particularly important to take into account the wishes of any child who has allegedly been abused, and to give that child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

When responding to concern(s) or allegation(s) of child-on-child abuse, the College will record the information that is necessary for the College and other relevant agencies (where they are involved) to respond to the concern(s) or allegation(s) and safeguard everyone involved.

The College may wish to consider whether disciplinary action may be appropriate for any child/children involved. However, if there are police proceedings underway, or there could be, it is critical that the College works in partnership with the police and/or children's social care. Where a matter is not of interest to the police and/ or children's social care, the College may still need to consider what is the most appropriate action to take to ensure positive behaviour management.

Disciplinary action may sometimes be appropriate to:

• Ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;

• Demonstrate to the child/children and others that child-on-child abuse can never be tolerated; and

• Ensure the safety and wellbeing of other children.

However, these considerations must be balanced against any police investigations, the child's/children's own potential unmet needs, and any action or intervention planned regarding safeguarding concerns.

Before deciding on appropriate action, the College will always consider its duty to safeguard all children in its care from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

AI and Emerging Technologies

The College recognises that artificial intelligence (AI) and other emerging technologies present potential safeguarding risks alongside educational benefits. These include:

- Exposure to harmful or age-inappropriate content.
- Online grooming, exploitation, or bullying through AI-enabled platforms.
- Creation or distribution of indecent or manipulated images, including deepfakes.
- Collection and misuse of personal data shared with AI tools.
- Use of AI to harass, impersonate, or target other pupils or staff.

The College will:

- Educate pupils about the safe and responsible use of AI tools as part of the online safety curriculum.
- Ensure staff understand the safeguarding risks of AI and can recognise signs of misuse.
- Block or restrict access to high-risk AI platforms via the College network, where appropriate.
- Respond to incidents involving AI in line with safeguarding and behaviour policies, including reporting to the Designated Safeguarding Lead (DSL), Jabatan Kebajikan Masyarakat (JKM), Royal Malaysia Police (PDRM), and other relevant agencies when necessary.
- Review and update online safety guidance annually to reflect technological developments.

Upskirting

The issue of upskirting within schools has developed with the use of mobile phones by young people and can be a form of child-on-child abuse. Upskirting refers to the act of taking unauthorised and non-consensual images or videos under a person's clothing, typically capturing intimate areas, without their knowledge or consent. Epsom is committed to creating a safe and inclusive environment, where everyone feels respected, protected, and supported and therefore upskirting is not tolerated.

Prevention Strategies:

The school will clearly define upskirting, ensuring that all members of the school community understand what it entails. Education will be conducted to inform students, staff, and

parents/guardians about upskirting, its consequences, and the school's zero-tolerance policy towards such behaviour.

We promote an open dialogue to encourage reporting and seeking support in case of upskirting incidents.

Epsom College upholds a positive school culture that promotes respectful behaviour, consent, and personal boundaries.

Students are educated about the importance of consent and the potential consequences of upskirting, both legally and within the school community.

Reporting:

Epsom College encourages the reporting of any suspected or observed upskirting incidents to a designated safeguarding lead, a trusted teacher, or a member of the school's administration.

Confidentiality and Support:

All reports of upskirting will be treated with the utmost confidentiality, while ensuring information is shared only with relevant personnel involved in the investigation and support process.

Support and guidance will be provided to victims, ensuring their safety, well-being, and access to appropriate services, such as counselling or legal advice.

The College will maintain open lines of communication with parents/guardians, keeping them informed about any upskirting incidents involving their child and the steps being taken to address the situation.

Investigation and Disciplinary Actions:

Promptly investigate all reported upskirting incidents, ensuring a fair and impartial process.

Take appropriate disciplinary actions against perpetrators, adhering to school policies, local regulations, and, if necessary, involving law enforcement agencies.

Implement restorative justice practices to address the harm caused by upskirting, fostering empathy and understanding among all parties involved.

Staff Training and Awareness:

Safeguarding and child protection training will include recognising signs of upskirting and responding to disclosures.

Staff will be made aware of the reporting procedures, their role in supporting victims, and the potential consequences for failing to report or address upskirting incidents.

Epsom College is committed to maintaining a safe and respectful environment for all individuals. By implementing this policy on upskirting, we aim to raise awareness, prevent incidents, support victims, and hold perpetrators accountable. Through collective efforts we aim to foster a culture of respect, consent, and personal integrity within our school community.

Teenage knife use and violence

Epsom College's primary goal is to ensure the safety, well-being, and positive development of all students. Knife-related incidents and violence have the potential to cause significant harm to individuals and the wider school community. As a school we aim to create a secure and supportive environment that discourages knife use and promotes peaceful conflict resolution.

Prevention:

At Epsom Colleges we promote a positive school culture that values respect, empathy, and non-violence.

We provide ongoing education to students, parents/guardians, and staff about the dangers and consequences of violence and promote peaceful conflict resolution.

At Epsom we help our students develop conflict resolution skills and encourage open communication, promoting alternatives to violence as the means to resolve conflicts.

Reporting:

Establish clear channels of communication and encourage reporting of any concerns related to knife use or violence, whether observed or suspected.

Ensure that students and staff feel safe and confident in reporting incidents to designated safeguarding leads or trusted staff members.

Provide appropriate support and intervention for individuals involved in knife-related incidents or violence, including counselling services, mentoring programs, and referral to external agencies if necessary.

Staff Training:

Staff Safeguarding and Child Protection Training will include recognising signs of potential knife use or violent behaviour, responding to disclosures.

Educate staff on effective de-escalation techniques, conflict resolution strategies, and ways to create a safe and nurturing environment that minimises the risk of violence.

Epsom College is committed to ensuring the safety of our students, staff, and the wider community. We aim to create a secure and nurturing environment where all individuals can thrive and develop positive, non-violent relationships. Together, we can foster a culture of respect, empathy, and peaceful conflict resolution within our school community.

Complaints

The College has in place formal complaints procedures[7] for both pupils and parents. Complaints and concerns relating to any safeguarding issue should be addressed in the first instance to the DSL, who will attempt to resolve the matter in a way that satisfies the complainant while balancing the rights and duties of pupils. Pupils will not be penalised for making a complaint in good faith.

[7]Policy document: *Complaints*

Racist Incidents

The College acknowledges that repeated racist incidents or an isolated serious incident may lead to consideration under child protection procedures.

Missing Pupils

Where a pupil is inexplicably absent from morning or afternoon registration the teacher of that child will send an "alert" through the ISAMS register. The alerts will be monitored by the attendance officer, Housemasters/mistresses and the Deputy Headteacher Pastoral who will make appropriate enquiries. If a student is not located the Deputy Headteacher will organise a search. If a pupil's absence remains unexplained staff should refer to the Attendance at School Policy. We recognise that irregular or missing attendance may be indications that a pupil is suffering abuse, and will be alert to that possibility.

Sexual Exploitation[8]

Involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. It ranges from seemingly consensual relationships to serious organised crime, but is always marked by an imbalance of power. The 'boyfriend' model by which exploitation may begin, is attractive to those who for any reason are vulnerable to a loving approach, and we understand that this risk exists for all young people, and urge staff to be vigilant to be able to identify and report where this may be happening.

Female Genital Mutilation[9], Forced Marriage, Radicalisation[10]

The school acknowledges that we all have a responsibility to be vigilant to the possible existence of any of these serious risks concerning our pupils or their families. All staff at Epsom College in Malaysia have a specific safeguarding duty under the UK Counter-Terrorism and Security Act March 2015, to have due regard to the need to prevent people being drawn into terrorism. It is also the duty of everyone to protect and identify those pupils who may be vulnerable to radicalisation and to identify behaviour which, if it gives cause for concern, should be reported to the DSL in the first instance, or to the police[11].

Prevention of Harm and Abuse

[8]See P11 – KCSiE Part 1 – for further detail
[9] See P11 – KCSiE Part 1 – for further detail.
[10] See P12 – KCSiE Part 1 – for further detail on Radicalisation and the Prevent duty.
[11] See *Safeguarding Advice – Pupils who may be vulnerable to Extremism*.

We recognise that the College has a significant part to play in the prevention of harm to our pupils by teaching them to be aware of potentially harmful lifestyles and of other threats to their general well-being, and by providing good lines of communication with trusted adults, supportive friends and an ethos of protection.

The College community will therefore:

- establish and maintain an ethos where pupils feel secure and are encouraged to talk and are always listened to;
- ensure that all pupils know there are adults in the school, and counsellors, whom they can approach if they are worried or in difficulty; and
- include in the curriculum, by means of PSHE lessons, and present in the less formal setting of the weekly tutor period opportunities that equip children with the skills they need to stay safe from harm and to know to whom they can turn for help.

Health & Safety

The College's Health & Safety policy, together with other published procedures and policies,[12] reflect the consideration given to the protection of pupils and concern for their welfare, both physically within the school environment, and, for example, in relation to internet use, and when away from the College undertaking school trips and visits.

Staff Physical and Emotional Wellbeing

Staff wellbeing, both physical and emotional, is important in and of itself. It is also important for staff to be able to undertake their duties and ensure the highest standards of care for our students.

With this in mind, consent is hereby given by staff in the employment of Epsom College in Malaysia to request their medical information at any time during their employment from the medical practitioner treating them for any illness, disease or injury. In addition, Epsom College in Malaysia may compel staff to receive treatment if we have reasons to believe that there is such a need, and failure to receive said treatment may result in risks to the staff member or others.

Further, by accepting an offer of employment, staff are hereby consenting to Epsom College in Malaysia processing their personal data and their sensitive personal data (including medical information) as defined under Malaysian law.

Guardians

With regard to Standard 14 of the National Minimum Standards for Boarding, Epsom College Malaysia will not appoint guardians for any of its pupils.

[12] *Policies relating to the use of IT at Epsom College in Malaysia*

EPSOM
COLLEGE
MALAYSIA

APPENDIX 1

Key Contact Information:

Talian Kasih 15999 (Formerly Childline Malaysia)
This helpline is for abused or lonely children, as well as a helpline for reporting cases of abuse.

Department of Social Welfare Malaysia, Ministry of Women, Family and Community Development
Tingkat 21-24
Menara Tun Ismail Mohamed Ali
Jalan Raja Laut
50562 Kuala Lumpur, Malaysia
Tel : 603 - 2697 1090
Website : www.jkm.gov.my

Negeri Sembilan Social Welfare Department
Jabatan Kebajikan Masyarakat Negeri, Tingkat 1, Blok B, Wisma Negeri, 70503 Seremban, Negeri Sembilan.
Telephone: +606-765 9550
Email: pjkmns@sukns.gov.my.
For more information please visit https://www.ns.gov.my/en/

One Stop Crisis Centre (nearest facility Putrajaya)
These centres are set up in almost every hospital of Malaysia. They a team of four governmental agencies and non-governmental organizations(NGOs) and it is also all out to assist the survivors or victims of crisis under one roof to fight against any forms of violence such as domestic violence, rape, sodomy, and child abuse. http://www.myhealth.gov.my/en/one-stop-crisis-centre-oscc/

1. Our Child Protection policy is presently undergoing a review process, and new elements on child-on-child abuse, teenage knife use and violence, and upskirting are being added to it. Our school's policy will be taking into account the policy elements from our sister school in the UK, which can be found at this link: