Safer Working Practices

XCL Education Malaysia

Approved by:	[Anthony Partington]	**Date:** 1 August 2025
Last reviewed on:	1/8/2025	
Next review due by:	1/8/2026	

XCL Education Malaysia Safer Working Practices Policy

Contents

1. Our Commitment

1.1 At XCL Education Malaysia, safeguarding is everyone's responsibility. This includes ensuring that all adults act professionally, maintain clear boundaries and understand the importance of their role in protecting children.

1.2 This policy applies to all adults working in our schools — teaching staff, support staff, coaches, volunteers, contractors, interns and vendors. Whether on campus, online, or off-site, these expectations remain the same. They reflect the professional standards expected of those who work with children around the world and are reinforced by the Malaysian Ministry of Education. They are in place not because we distrust our staff, but because children need clarity, consistency and adults who know where the line is and hold it.

1.3 Safer Working Practices are not optional. They are a non-negotiable part of our professional standards. Breaches of this policy may result in disciplinary action, up to and including dismissal.

> "It is vital that staff recognise that they are in positions of trust and maintain clear professional boundaries at all times."
> — *Keeping Children Safe in Education, 2025*

2. Core Principles

2.1 – We are professionals first.
Every interaction with a student is shaped by our responsibility to model safe, respectful behaviour.

2.2 – We keep boundaries firm.
We do not blur the line between personal and professional roles, even when intentions are good.

2.3 – We communicate the right way.
We use only approved platforms and devices for all school-related communication.

2.4 – We work transparently.
We avoid being alone with students out of sight, and ensure all interactions could stand up to scrutiny.

2.5 – We protect children — and ourselves.
We follow this guidance consistently to create a culture of safety and trust.

3. Why This Matters

3.1 We are a collaborative and caring school environment. But blurred boundaries create risk — for students, for staff, and for the school as a whole. This policy protects children, upholds your professional reputation and ensures we keep our promises to families.

4. Breaches of This Guidance

4.1 Breaching safer working expectations is a serious matter. All staff are expected to follow this policy. If something feels unclear, speak to your line manager, Designated Safeguarding Lead (DSL) or Principal . It's always better to check than to guess.

4.2 Failure to do so may result in disciplinary action, including dismissal.

5. How to Use This Document

5.1 This document is not just a list of rules — it is a practical guide to help you make confident, professional decisions. Use it regularly to:

- **Check your judgement** when you're unsure what's appropriate

- **Reflect on your actions** when situations feel uncomfortable

- **Support conversations** with colleagues when boundaries are unclear

Remember:

5.2 Being friendly is not the same as being familiar. It's fine to joke with students in the canteen — but it's not okay to share personal stories, offer life advice, or chat privately online.

5. 3 If you are ever unsure, use this document as your first point of reference — and speak to your DSL for support.

XCL Malaysia Safer Working Practices: *Every adult. Every setting. Every time.*			
	DO	**DON'T**	**Clarifications:**
A: Digital Communication	• Use only school-approved platforms (e.g. Teams, school email) for all communication with students and parents. • Use school phone systems (e.g. 3CX) to contact parents.	• Do not use personal messaging apps (e.g. WhatsApp, Telegram) to communicate with students. • Do not set up private WhatsApp groups with parents unless explicitly approved.	**WhatsApp Groups:** Must be pre-approved by HR/Principal using the risk assessment template in the appendix. Groups should be deleted after the event ends. **Blended Roles:** If you're also a parent or community member, clarify the context of communication. If the conversation shifts into school matters, revert to professional channels. **Uncertainty:** If unsure, consult your DSL. **Exceptions:** • Boarding staff using WeChat with international parents must follow boarding communication guidelines. • REAL Kids staff should follow their centre's adapted early years communication protocols for the use of WhatsApp.
B: Social Media and Online Presence	• Use social media responsibly and ethically — model safe, respectful behaviour. • Keep personal profiles private or locked wherever possible. • Report any concerning online behaviour involving staff, students, or the wider school community. • Be discreet when posting from campus or school events on personal accounts..	• Do not friend, follow, or message current students, or ask them to follow you, on platforms like Instagram, Facebook, TikTok, or via WhatsApp status updates. • Do not share personal posts that include images of students or reveal identifiable student or school information. • Do not post about internal school matters in ways that could damage trust, confidentiality, or team morale.	**Pre-existing Connections:** You may have online links with families (e.g. neighbours, relatives, family friends). These are not forbidden — but must not be used to discuss school or work matters. **If unsure:** Block, mute, or restrict access — or speak to your DSL for advice. **Golden Rule:** If you wouldn't say or post it in front of your Principal, don't put it online.

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	DO	**DON'T**	**Clarifications:**
C: Taking Photographs of Students	• Use school-owned devices whenever possible to take student photos. • If a personal device is used, delete all student images at least once a month. • Upload all images promptly to a secure school platform (e.g. Teams). • Protect student privacy and dignity — including students captured in the background.	• Do not store student images long-term on personal devices. • Do not post student images on personal social media or in private chat groups. • Do not take photos in private or sensitive situations (e.g. changing rooms, toilets, when a student is unwell).	**Your Own Child:** You may take photos of your own child — even at school events — but you must still role model safer practice. Avoid uploading images with other identifiable students. **Event Guidance:** At events like swimming galas or sports days, where students wear minimal clothing: – Use wide or group shots – Avoid close-ups – Never post images that could embarrass or expose students.
D. Physical Contact	• Use physical contact only when necessary — for safety (e.g. PE), first aid, or brief emotional reassurance. • Always explain what you're doing ("I'm going to help you up") and ensure others can see you. • Follow agreed procedures for physical checks (e.g. bag checks, pocket checks), and ensure they are witnessed.	• Do not use touch casually — this includes hugs, tickling, lap-sitting, or unnecessary arm touches. • Do not engage in prolonged, intimate, or unseen physical contact. • Do not conduct bag or item checks without another adult present or a clear safeguarding reason.	**Cultural Context:** In some settings, physical affection from children may feel normal (e.g. hugs, hand-holding). You must still ensure all contact is: – Brief – Explainable – Observable by others **Spot Checks & Searches:** If a bag or item needs to be checked: – Ask permission where possible – Have another adult present – Never reach into students' pockets or clothing – Log the check if it relates to a behavioural or safeguarding concern **Early Years:** See separate guidance for children under age 7.
E. Dress and Appearance	• Maintain a professional appearance that reflects your role and respects Malaysian cultural norms. • Wear role-appropriate clothing — e.g. PE staff may wear modest, functional sportswear. • Always wear your staff lanyard while on campus.	• Don't wear loungewear, revealing clothing (e.g. crop tops, short shorts, low-cut tops), or anything that may cause discomfort or offence. • Don't wear outfits that blur professional boundaries or appear overly casual in a school setting.	**Theme Days & School Events:** Dress-down days, off-site trips, or themed events are encouraged — but your clothing must still reflect your professional role. Ask yourself: *"Would I be comfortable explaining this choice to a parent or student?"* When in doubt: support the spirit of the day, but avoid anything that could cause offence.

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	DO	**DON'T**	**Clarifications:**
F. Shower, Changing, and Toilet Use	• Respect students' right to privacy and dignity during showering, changing, or toilet use. • Supervise appropriately — ensuring safety, behaviour, and wellbeing — without invading privacy. • Announce your presence before entering any student toilet or changing area. • Use only adult-designated toilets yourself.	• Do not use student toilets or allow students to use staff toilets. • Do not change or shower in the same facilities as students. • Never be alone with a student in an enclosed, unsupervised space unless absolutely necessary — and another adult must be aware.	**Shared Spaces (e.g. trips or events):** – Supervise in pairs where possible. – Use open-door supervision or stay near entrances. – Be visible but respectful **Help with Personal Care:** If a student requests assistance (e.g. illness or accident): – Assess the situation. – Involve another adult if possible. – Record the incident in MyConcern / REAL Kids Platform. **Marketing Tours:** Staff may accompany visiting parents into student toilet areas to show facilities — but only if the space is empty of students. Never enter if students are inside or likely to be present. Always explain the reason and act with professionalism. When in doubt: protect student dignity and self-report anything that could be misinterpreted.
G. One-to-One Working	• Meet with students for academic or emotional support when necessary — but always in professional, visible spaces. • Inform a colleague when a 1:1 meeting is taking place. • Use rooms with glass panels or keep the door open. • Choose locations where other staff are nearby, even if not directly present. • Offer privacy through discretion, not isolation. • Maintain professional physical distance.	• Do not hold 1:1 meetings in isolated, locked, or unsupervised spaces. • Do not close the door or obscure visibility during private conversations. • Do not engage in physical contact during 1:1 interactions.	**Boarding Settings:** 1:1 conversations must take place in communal or visible areas — never in bedrooms. **Tutoring, Coaching, Mentoring:** Any private arrangements — whether paid or unpaid — must be declared in the Conflict-of-Interest Register. This includes support offered outside school hours or online. When in doubt, prioritise visibility, transparency, and clear records of intent.

	DO	DON'T	Clarifications:
H. Transporting Students	• Only transport students if explicitly authorised by school leadership. • Declare any paid transport arrangements (e.g. tutoring pickups) via the HR Conflict of Interest Register. • In unexpected situations (e.g. missed bus, trip delay), contact a senior leader before offering a lift — and complete a risk assessment.	• Do not offer lifts to students in your personal vehicle without permission and a clear safeguarding reason. • Do not assume informal or last-minute lifts are acceptable just because they seem convenient or helpful.	**Private Lifts Outside School Hours:** If your own child is friends with a student and you offer a lift for social reasons, this is a private family arrangement — not requiring a school-sanction. That said, staff must still apply **professional judgement** and avoid any situation that could: – Blur personal and professional roles – Raise concerns about favouritism or unequal treatment If you are transporting children as part of a **paid arrangement**, please complete the conflict of interest declaration in Appendix 1. **Medical Emergencies:** – Seat the student in the back with a seatbelt. – Have another staff member present where possible. – Inform leadership and log the incident immediately afterwards.
I. Private Tutoring, Coaching, and Academic Support	• Declare any tutoring, coaching, or academic support arrangement via the Conflict of Interest Register. • Only tutor students from outside your own division or programme. • Choose public, neutral venues such as tuition centres or coffee shops. • Maintain records of sessions, locations, and communications.	• Don't tutor students from your own section (e.g. National Primary staff may not tutor National Primary students). • Don't use bedrooms, staff accommodation, or private residences for tutoring — even with parental consent. • Don't use school resources (classrooms, Teams, printers, materials) for any private tutoring.	Private tutoring can support learning — but it must be fully transparent and professionally distanced. Using school spaces, digital tools, or personal homes creates both safeguarding and fairness risks. Where in doubt, speak to your DSL or line manager before accepting a request.
J. Gifts and Favouritism	• Declare any gift over RM300 to your line manager or Principal. • Where appropriate, share gifts with the wider team rather than accepting them individually.	• Do not give personal gifts to students. • Do not accept significant or repeated gifts without declaring them.	**Cultural Sensitivity:** Gifts are common in some cultures and often given with warm intentions — but transparency is still essential. **Modest Gifts:** If a gift is small (e.g. snacks, souvenirs), thank the giver and inform your line manager informally. **If Unsure:** If a gift feels overly personal, frequent, or creates discomfort, report it to a senior leader. It's not about rejecting kindness — it's about maintaining fairness and professional boundaries.

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	DO	DON'T	Clarifications:
K. Social Situations Outside School	• Remember that your professional role still applies outside school hours and off campus. • Maintain appropriate boundaries and avoid one-to-one interactions with students in informal settings. • Keep professional information private — don't share confidential matters in casual or social conversations.	• Do not attend private gatherings with only students present unless another responsible adult is present and permission has been granted. • Do not invite students to your home for lessons, mentoring, or informal meetings. • Do not spend time alone with a student you know socially unless acting in a clearly defined family or parental role (e.g. godparent). • Never allow social familiarity to override safeguarding expectations.	**Community Connections:** In a close-knit school, it's normal to cross paths with students and families at meals, religious events, playdates, or community gatherings. These are not prohibited — but boundaries must still apply. **Professional Judgement:** If something could be misinterpreted, pause and seek guidance from your Principal or DSL. These standards are here to protect you as well as your students — not to exclude you from community life.
L. Tone, Language & Behaviour Management	• Speak to students with calm authority, using respectful, age-appropriate language. • Set firm, clear expectations and model the behaviour you expect. • Use positive behaviour strategies — your responses should be dignified, fair, and consistent.	• Do not yell, use sarcasm, shame, threats, or public humiliation. • Avoid nicknames or language that could embarrass, confuse, or be misinterpreted.	**Shame is never a tool for discipline.** It undermines trust, damages emotional safety, and often escalates behaviour. **Students respond best** when they feel safe, respected, and understood. If you're unsure whether your tone or words crossed a line, seek advice from your DSL or a trusted colleague. **Kindness and authority are not opposites — they must co-exist in every interaction.**
M. Low-Level Concerns and Position of Trust	• Report any behaviour — yours or others' — that feels unusual, overly familiar, or inappropriate, even if it seems minor. • Use the low-level concerns form or speak directly to your DSL. • Reflect regularly on your own conduct and professional relationships.	• Don't dismiss repeated behaviour that may form a pattern — even if it doesn't meet a safeguarding threshold. • Don't allow your seniority or role to make others feel they can't question your behaviour.	**If you notice a comment, gesture, or interaction that makes you uncomfortable — act.** Don't wait for something to "become serious." If it's bothering you, it matters. **You are not expected to judge how serious it is** — that is the role of the DSL. Your responsibility is to pass the concern on. Speaking up protects students and staff — including you. A culture of openness starts with the little things.

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	DO	**DON'T**	**Clarifications:**
N. Whistleblowing, Allegations, Concerns, and Uncertainty	• Report immediately if you are concerned about another adult's behaviour — even if it's just a gut feeling. • Use MyConcern/Confide, speak to your DSL, or contact XMCO directly if needed. • Prioritise student safety over hierarchy.	• Don't ignore concerns or try to handle them on your own. • Don't assume someone else will report it — act.	**Uncertain if it's a safeguarding issue? Report anyway.** Your job is to raise the concern — not to assess its seriousness. If you believe leadership is aware but hasn't acted — and a child may be at risk — you must escalate. **Your duty is to the child, not the chain of command.** You are protected when raising concerns in good faith. XMCO is available for independent reporting and guidance. See the appendix for contact details.

6. Staff Children and Family Relationships

Many of our staff are also parents or have longstanding relationships within the school community. These connections are valued — but they also require additional care to maintain professional boundaries.

Scenario	✅ DO	❌ DON'T	Clarification
You are a staff member and a parent at the school	• Communicate via formal school channels when acting as a parent • Avoid favouritism or informal discipline of your child or their peers	• Don't discipline other students in a personal capacity • Don't give preferential treatment to your child or their peers • Don't shout at or publicly reprimand your own child while acting in your staff role	Maintain fairness, consistency, and professionalism. Your child is entitled to the same respectful behaviour as other students.
You have social/family ties with students or parents	• Be clear about your role in each interaction (parent, friend, staff) • Declare ties that may influence judgement	• Don't blur professional and personal boundaries	Transparency helps avoid perceived favouritism or conflicts of interest.

These expectations don't stop you from being part of the community — they exist to protect students and staff, and to ensure clarity and consistency.

7. Grooming and Student Infatuation

Being in a position of trust means recognising that our actions, words, and even silence carry weight. We must be alert to situations where a student's feelings towards a staff member become inappropriate, or where boundaries begin to blur — even subtly.

The law is clear: It is a criminal offence for a person in a position of trust to engage in any sexual communication or relationship with a child under 18, even if the child believes the relationship is consensual.

7.2 Examples of Grooming

- Excessive 1:1 time or private messaging outside learning platforms
- Gift-giving, unnecessary praise, or personal compliments
- Creating a sense of "special" friendship or loyalty
- Discussing personal issues, adult problems, or confiding in a student

7.3 If a Student Appears to Have a Crush or Infatuation

- Don't ignore it or joke about it — inform your DSL
- Maintain strict professional boundaries
- Avoid being alone with the student (classrooms, offices, online)
- Refrain from engaging in any behaviour that could be interpreted as reciprocation
- Record the incident as a low-level concern

What might feel flattering can quickly become a safeguarding issue. You don't need to have done anything wrong for a situation to become risky — which is why transparency and early reporting are essential.

7.5 Always Act Early

If something feels "not quite right," speak to your DSL. You are protecting the student — and yourself.

7.6 Sexual Offences Against Children Act 2017 (Malaysia)

Under the **Sexual Offences Against Children Act 2017**, it is a **criminal offence** in Malaysia to:

- **Groom** a child under 18 — including forming emotional closeness, giving gifts, or engaging in communication with the intent to commit a sexual offence
- **Possess, produce, distribute, or access** child sexual abuse material (CSAM), including digitally altered or AI-generated material
- **Engage in sexual communication** with a child, regardless of consent or whether physical contact occurs

Intent alone is enough to constitute a criminal offence.

Staff do not need to act for the offence to be committed — if behaviour shows *planning or sexualised interest*, it may still be prosecutable.

All staff must understand that **position of trust offences** apply even if a child is over the age of sexual consent but under 18.

If you notice something concerning — even a joke, a comment, or a message — report it. You do not need to investigate. You only need to raise the concern.

8. Student Behaviour That Tests or Crosses Boundaries

8.1 Some students may push boundaries with staff, either deliberately or unconsciously. This can include flirtatious comments, personal questions, persistent attention-seeking, or sexualised behaviour (e.g. inappropriate jokes, gestures, or touch). These may reflect typical adolescent development — or prior trauma or exposure to harm.

Staff Must:	Staff Must Not:
• Maintain clear professional boundaries at all times • Use calm, clear redirection (e.g. "That's not an appropriate comment.") • Log the incident with the DSL — especially if it forms part of a pattern	• Engage, laugh along, or dismiss the behaviour as harmless • Retaliate, make sarcastic remarks, or share personal experiences that are professionally inappropriate. • Keep concerning behaviours about children to themselves — even if they don't feel serious

9. Student Disclosures, Oversharing and Emotional Distress

Students may speak to staff about private, upsetting, or confusing experiences — either deliberately or unintentionally. This may happen during lessons, in passing, online, or through artwork, writing, or behaviour.

If a Student Discloses Abuse or Harm	If a Student Overshares or Forms an Emotional Attachment	If a Student Is Distressed
• Stay calm and let them speak freely • Reassure them: "You've done the right thing telling me." • Do not promise confidentiality or ask leading questions • Report to the DSL immediately • Record their exact words as accurately as possible	• Don't act as a therapist or confidante • Avoid giving advice or personal stories • Redirect the conversation to safe, neutral ground • Ensure another adult is aware — especially if repeated	• Don't be alone with them behind a closed door • Offer calm presence but refer them to appropriate support (e.g. counsellor, pastoral staff) • Record concerns if the distress is prolonged or unexplained

You are not expected to solve problems — but you are expected to notice, act, and pass it on.

10. Monitoring & Review

10.1 This policy is reviewed annually, or sooner if an incident, legal update, or safeguarding concern prompts a revision. This policy is a living document. If a situation arises that is not clearly covered here, err on the side of professional distance — and check with your DSL

10.2 Campus-level safeguarding teams and DSLs are responsible for ensuring this policy is understood, applied consistently, and reflected in day-to-day practice.

10.3 Feedback from staff, observations during audits, and emerging issues from low-level concerns or investigations will inform future improvements.

10.4 Serious breaches of this policy may trigger a broader safeguarding audit or case review.

11. A Final Word

11.1 Every interaction with a student is a safeguarding moment — whether it's in the classroom, on a school trip, or at a community event.

11.2 Working in a school is not like working anywhere else. We are in positions of trust — legally, ethically, and emotionally. Children look to us for safety, fairness, consistency, and guidance. That trust must never be taken lightly.

11.3 At XCL Education Malaysia, we build strong relationships. But the strongest relationships are professional ones — grounded in respect, responsibility, and protection.

"It is vital that staff recognise that they are in positions of trust and maintain clear professional boundaries at all times."
— *Keeping Children Safe in Education, 2025*

Thank you for holding the line. Every child deserves nothing less.

Appendix 1: Conflict of Interest Declaration – Tuition, Transport, and Coaching

As outlined in our *Safer Working Practices*, all staff must maintain clear professional boundaries and avoid situations that could be misinterpreted or lead to a conflict of interest. This includes private tuition, transporting students, or coaching activities outside of regular school duties.

✓ Staff must never engage in 1:1 tutoring, transport, or coaching in isolated or unsupervised settings.

✓ All such arrangements must be visible, transparent, and approved in advance by school leadership.

✓ Staff must not accept payment for tutoring students who are currently enrolled in the **same division or programme** of the school that they teach in — for example, a National Primary teacher may not privately tutor National Primary students. This includes formal or informal tuition, regardless of setting.

✓ Where private arrangements involve students from another division (e.g., an International Secondary teacher tutoring a National Primary student), a **Conflict of Interest Declaration** must still be completed and approved.

These guidelines exist to protect students and staff, and to uphold fairness, transparency, and trust across the school community.

Please complete the following declaration:

1. Private Tuition

- Are you currently providing, or planning to provide, private tuition to any student within our school?
  ☐ Yes ☐ No

If yes, please provide details:

- Name(s) of student(s):
- Your relationship to the student(s)
- Location and supervision arrangements:

2. Transporting Students

- Are you currently providing, or planning to provide, private transport (e.g., regular lifts) to any student within our school?
  ☐ Yes ☐ No

If yes, please provide details:

- Name(s) of student(s):
- Is this part of an approved school arrangement or a private agreement?
- How will you ensure this is visible and transparent?

3. Outside Coaching or Paid Activities

- Are you currently providing, or planning to provide, paid coaching, mentoring, or other activities for students within our school, outside of normal school hours?
  ☐ Yes ☐ No

If yes, please provide details:

- Name(s) of student(s):
- Nature of the activity:
- Location and supervision arrangements:

4. Declaration of Understanding

Please confirm the following:

☐ I understand that I must never provide 1:1 tuition, transport, or coaching in unsupervised or isolated settings.

☐ I understand that I must not accept monetary payment for tutoring students currently in my own class, as this creates a conflict of interest.

☐ I have read and understood the Safer Working Practices and agree to follow these expectations.

☐ I agree to report any changes to this information immediately to my Principal or HR.

Name: _____

Role: _____

Signature: _____

Date: _____

Appendix 2: Temporary WhatsApp Group – Risk Assessment & Approval Form

🔰 **Safeguards & Guidelines for WhatsApp Use (Exceptional Circumstances Only)**

❗ **Important Legal Reminder – Malaysian Law**

Under the Malaysian Communications and Multimedia Act 1998 (Section 233), anyone who knowingly spreads offensive, false, or misleading content via digital communication — including in WhatsApp groups — can face prosecution.

👉 Group Admins are legally responsible for the content shared in any WhatsApp group they create or manage. If a parent or student shares misinformation or harmful content in a school WhatsApp group, the staff admin may be held accountable if appropriate action (e.g. removing content, reporting) is not taken.

For this reason:

- WhatsApp groups should only be created when absolutely necessary.

- Admins must monitor posts and remove inappropriate content immediately.

- All concerns should be reported via school safeguarding channels.

🚫 **WhatsApp Must NOT Be Used For:**

1. Direct messaging students under any circumstance.

2. Individual chats with parents unless authorised for a specific reason and logged with DSL.

3. Sharing personal phone numbers with students or parents.

4. Sending academic feedback, behavioural concerns, or safeguarding information.

5. Organising or soliciting private tuition, coaching, or paid services.

6. Discussing internal school matters (e.g. staffing, complaints, student behaviour).

7. Forwarding jokes, memes, or personal opinions.

✅ **Permitted Use – Only If Approved:**

- For short-term, logistical coordination during school trips, off-site events, or emergencies.

- Group chat only — no private or side messaging.

- DSL and Principal approval is mandatory using the risk assessment form.

🔒 **Safeguarding Controls:**

1. Groups must be time-limited, and deleted within 24 hours of the event ending.

2. Named staff may be group admins.

3. Group must have a clear description stating purpose and timeframe.

4. Personal student information (e.g. medical conditions, behaviour) must not be shared.

5. Participants must not be able to add or remove members — admins only.

6. All use must be logged with DSL as a safeguarding record.

💬 **Message Style & Content Guidelines (Staff Members / Those representing the School):**

DO	DON'T
Use clear, concise, factual messages about time, location, or changes.	Use casual, sarcastic, or overly familiar language.
Begin with a greeting and end with your name/role (e.g. *"Hi everyone, this is Mr Arif..."*)	Use nicknames or emojis that blur professional tone.
Use formal spelling and punctuation.	Use abbreviations like "u" or "lol", or voice notes.
Stick to group-relevant information only.	Respond to personal queries in the group — move to formal channels.
Always copy another staff member into any urgent responses that might involve a concern.	Ignore questions or complaints — acknowledge and refer them appropriately.

📑 **Before Creating a WhatsApp Group, You Must:**

1. Complete the WhatsApp Risk Assessment Form.

2. Get DSL and Principal approval.

3. Inform parents/students of the group's purpose and temporary nature.

4. Plan for how the group will be monitored, disbanded, and deleted.

Important Notice:

At XCL Education Malaysia, our default position is to **avoid using private messaging platforms** such as WhatsApp, Telegram, or similar tools for school-related communication with students or parents. This is because such platforms:

• Increase the risk of **blurred professional boundaries**

• Make it difficult to **monitor or audit communication**

• May expose staff and students to **unintended safeguarding risks**

• Do not comply with **school data protection and visibility expectations**

Only in exceptional circumstances, where all other approved platforms (e.g. Teams, email) have proven ineffective or inaccessible, may a temporary WhatsApp group be used — and only with **DSL and Principal approval**.

If you believe a WhatsApp group is essential, you **must complete this risk assessment**, ensure all safeguarding controls are in place, and confirm that the group will be **disbanded within 24 hours** of the end of the event.

This form ensures accountability, transparency, and that child safeguarding remains our highest priority.

📄 **Risk Assessment Form: Temporary WhatsApp Group Use**

Purpose: For short-term communication in circumstances where school-approved platforms are not practical or accessible. Must be approved by a senior leader and DSL.

SECTION A: GROUP SETUP

Item	Detail
Name of Group	
Trip/Event Name	
Date Group Will Be Active	Start: ____ End: ____
Purpose of Group	e.g., logistical updates during trip
Alternative platforms attempted	(List methods attempted (e.g. email, Teams) and reasons for failure)
Staff Group Admin(s)	Name + Role
Audience	☐ Students ☐ Parents ☐ Both
Number of Participants	

SECTION B: RISK CONTROLS
Tick all boxes to confirm implementation:

Safeguard	Tick
Group description includes purpose and timeframe ☐	
Only school devices used where possible ☐	
Admin settings prevent others adding/removing members ☐	
No one-to-one messages permitted ☐	
No sharing of student personal information ☐	
All staff involved reminded of tone and content expectations ☐	
Group will be deleted within 24 hours of trip/event conclusion ☐	
DSL will log use in safeguarding file ☐	

SECTION C: DECLARATION
I confirm this WhatsApp group will be used only for the purpose stated, with appropriate safeguarding and data protection controls in place.

Name	Role	Signature	Date
	Staff Lead		
	DSL		
	Principal		