

# Safeguarding & Child Protection Policy

XCL Education Malaysia



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## XCL Education Malaysia Safeguarding & Child Protection Policy

***Keeping Every Child Safe  
Memelihara Keselamatan Kanak-Kanak***

***Last Update: August 2025***

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## **1. Our Commitment**

1.1 At XCL Education Malaysia, safeguarding is central to delivering on our promise to families: providing a safe, supportive environment where every child can thrive – academically, socially, and emotionally. Safeguarding is not a policy that sits on a shelf – it is a daily, shared responsibility. We see it as a never-ending cycle of reflection, improvement, and action.

*“Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families has a role to play.”*

- *Keeping Children Safe in Education, UK Department for Education, 2025*

*“Every child is entitled to protection and assistance in all circumstances, without distinction of any kind.”*

- *Child Act 2001, Preamble, Government of Malaysia*

1.2 This policy provides an overview of how we keep children safe across our schools and must be read alongside specific safeguarding policies and guidelines for different areas of our organisation.

1.3 Our approach reflects both Malaysian legal requirements and international best practice, including the standards set out in *Keeping Children Safe in Education* (KCSIE, UK, 2025), COBIS standards, and our obligations under Malaysian legislation such as the Child Act 2001 and the Sexual Offences Against Children Act 2017.

1.4 This policy applies to all students, regardless of age, including those aged 18 and above where they remain under the care of the school. *Safeguarding applies in every classroom, on every playground, during every activity, and in every conversation.*

## **2. Understanding Safeguarding and Child Protection**

Safeguarding and child protection are not the same, but both are essential to keeping children safe.

### **2.1 Safeguarding (memelihara keselamatan kanak-kanak)**

Safeguarding refers to the wide range of proactive measures we take to keep children safe, including:

- Safer recruitment of staff and volunteers
- Education for children on safety, wellbeing, and healthy relationships
- Safe physical and online environments
- Listening to students and taking concerns seriously

Safeguarding expectations apply at all times, including during off-site activities, trips, extracurricular programmes, and online learning environments.

*Small Actions, Strong Safeguarding – The Swiss Cheese Model: No single action or policy can prevent harm entirely. Every system has small gaps. But when we layer good practice – safer recruitment, supervision, staff training, student voice, clear reporting – those gaps rarely align.*

*Safeguarding is the work of many small, consistent actions by every adult, every day.*

## **2.2 Child Protection (perlindungan kanak-kanak)**

While safeguarding focuses on prevention, child protection refers to how we respond when a child has been harmed or is at risk of harm.

This includes:

- Recognising signs of abuse or unsafe situations
- Reporting concerns immediately
- Taking appropriate action to protect the child
- Working with families, authorities, and professionals in line with law and best practice

Significant harm includes physical, emotional, or sexual abuse, neglect, exploitation, or any situation that seriously affects a child's health, development, or wellbeing.

*Even with the strongest systems, harm can still occur. Our child protection response ensures swift, clear action when it does.*

## **3. Types of Harm We Respond To**

3.1 All adults working with children must be aware of the main categories of abuse as outlined in KCSIE:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

3.2 We also respond to specific safeguarding risks relevant to our context, including:

- Peer-on-peer abuse (also called child-on-child abuse)
- Online harm and exploitation
- Grooming or trafficking risks
- Abuse or neglect that occurs outside the home

3.3 Our responsibility is not to investigate, but to recognise, report, and respond. Every concern must be taken seriously.

3.4 We adopt a Contextual Safeguarding approach, recognising that harm can occur:

- At home
- At school
- Online
- In peer groups
- In the wider community

3.5 We ensure that our response is:

- Timely – concerns are addressed without delay
- Contextually relevant – we consider the unique circumstances of each child
- Supportive – children and families are supported throughout

- Child-centred – the safety, wellbeing, and voice of the child are central to every decision

*Cultural sensitivity matters, but it is never a reason to delay or avoid reporting a safeguarding concern. Every child matters, every time.*

#### **4. Reporting Concerns**

4.1 Every adult working with children has a duty to act if they are worried about a child's safety or welfare.

4.2 Concerns or allegations about the conduct of staff, volunteers, or other adults must be reported to the DSL or Principal immediately. This includes both serious and low-level concerns.

4.3 Concerns can be reported by:

- Speaking directly to the DSL, Deputy DSL, or a member of SLT
- Recording concerns on MyConcern / Confide / REAL KIDS reporting platform
- Using the whistleblowing process if the concern relates to adult conduct

4.4 It is not your role to investigate, but it is your responsibility to share concerns **without delay**. Best practice dictates that concerns should be reported on the same day they arise, or as soon as reasonably possible once they become known, to ensure timely action and appropriate support for the child.

4.5 We recognise that cultural, social, and organisational barriers may exist which make it difficult to raise safeguarding concerns – such as fear of offending, assumptions about family privacy, or hierarchical respect. However, these are never valid reasons for failing to report. Every concern must be shared, and every child deserves protection.

*Never assume someone else has already reported it. If in doubt, report.*

#### **5. The Designated Safeguarding Lead (DSL)**

5.1 Each campus or area has a trained DSL, supported by a Safeguarding Team. However, **every adult remains responsible** for safeguarding.

5.2 DSL responsibilities include:

- Ensuring all staff complete safeguarding training at induction and ongoing
- Monitoring reporting platforms (e.g. MyConcern)
- Providing monthly safeguarding reports to leadership
- Coordinating safeguarding leads for Early Years, Boarding, Sports, etc.
- Liaising with external agencies or networks
- Promoting a safeguarding culture across the school
- Offering guidance to Human Resources Colleagues, ensuring new staff are onboarded, and providing expertise for Safer Recruitment.

*Accountability cannot be delegated. The DSL leads the safeguarding system, but everyone must play their part.*

## **6. Key Documents & Guidelines**

6.1 This policy is the overarching statement of safeguarding intent and must be read alongside operational documents.

6.2 Documents forming the full safeguarding framework include:

### **6.2.1 Applicable to All Staff, Volunteers, Contractors** (School website)

- Staff Code of Conduct (applicable to all XCL Malaysia Employees)
- Safer Working Practices Guidelines 2025 (appendix to Code of Conduct)
- Annual Safeguarding Declaration (Sign-off required via Talent Oz)
- Safer Recruitment Policy and Procedure

### **6.2.2 Specialist Guidelines** (School website)

- Whistleblowing Policy
- Transport, Trips and Off-Site Activities Policy
- Volunteers, Contractors and Visitors Guidance
- Early Years Best Practice
- Boarding Safeguarding Guidance
- Sports, PE, and Coaching Safeguarding

### **6.2.3 Malaysian Context (Internal use)**

- Contextual Safeguarding in Malaysia
  - o KCSIE alignment
  - o Reporting requirements in Malaysia
  - o Child Act 2001, PDPA 2010, Penal Code, SOAC Act 2017
  - o Community-Specific Harm
- Risks in Private/International Education (Case Studies)

### **6.2.4 Best Practice and Awareness Resources**

- Safeguarding Induction & Student Guide
- Low-Level Concerns & Disclosure Response Guides
- Self-Harm and Mental Health Response Sheets
- Parental Engagement Guidance
- MyConcern Record Keeping Quick Guide
- SEN/EAL Considerations
- Social Media & Staff Behaviour Guidance

### **6.2.5 E-Learning Modules** (SharePoint)

- Basic Level Child Protection and Safeguarding
- Safer Working Practices
- Contextual Safeguarding in Malaysia
- Safer Recruitment (for HR and Hiring Managers)

*Everyone has a role. Everyone has a guide.  
Systems, training and documentation support safe decision-making.*

## **7. Monitoring & Review**

7.1 The safeguarding policy is reviewed annually, and updates made based on requirements. All staff working at XCL Malaysia are required to sign an annual declaration of suitability to work with children, and confirm they have read the updated policy. The annual declaration is available in Appendix 1.

7.2 Safeguarding is a process of continuous improvement.

We will:

- Maintain an ongoing safeguarding improvement plan tracker aligned to COBIS and SKIPS standards to monitor implementation and progress across all campuses. This is maintained by the Designated Safeguarding Lead, and progress is reported to the Central Safeguarding Team on a monthly basis.
- Review this policy annually in August or earlier if required
- Monitor trends via MyConcern and DSL reviews
- Conduct Serious Case Reviews for all high-level concerns
- Gather staff, student, and parent feedback
- Share internal best practice across all campuses
- Offer mandatory e-learning and external expert sessions
- Participate in the Association of International Malaysian Schools (AIMS) and the Federation of British International Schools in Asia (FOBISIA) safeguarding networks, where applicable

7.3 XCL Education Malaysia Academic Board will receive monthly safeguarding updates. The XCL Education Board will receive quarterly safeguarding updates and outcomes of audits. School Advisory Board and Parent Advisory Group members will also receive quarterly safeguarding updates to ensure transparency and community confidence in our safeguarding practices.

## **8. A Final Word**

*8.1 At XCL Education Malaysia, we all play our part. By working together, reflecting on our practice, and following the principles and protocols outlined in this policy, we build schools where every child feels safe, supported, and ready to succeed.*

*"It could happen here."*

*– Keeping Children Safe in Education, 2025*

*A simple reminder that vigilance matters. Every concern, every action, every child counts.*

## **Appendix 1: XCL Education Malaysia – Annual Safeguarding & Conduct Declaration (Sent Via-Talent Oz in October of every year)**

As a member of the XCL Education Malaysia community, I confirm the following as part of my **annual responsibilities** to uphold student safety and professional conduct:

### **1. Policy Acknowledgement**

I have read and understood the current versions of the following documents:

- **XCL Education Malaysia Safeguarding & Child Protection Policy**
- **Safer Working Practices Policy**

### **2. Agreement to Standards**

I agree to:

- Uphold the **Safer Working Practices Policy** at all times, including the standards on digital communication and communication, including social media.
- Immediately report any safeguarding concerns directly to the Designated Safeguarding Lead (DSL) or HR, maintaining confidentiality at all times.
- Model safe, respectful, and professional behaviour in all interactions with students, families, and colleagues.
- Adhere to all XCL safeguarding policies and procedures.

### **3. Disclosure of Criminal or Disciplinary Matters**

I declare that:

- I have **not been subject to any safeguarding concern, disciplinary process, or professional misconduct investigation** that has not previously been disclosed to HR as part of recruitment process and risk assessed accordingly.
- I have **not been subject to any criminal investigation, caution, charge, or conviction in any country** during my time with XCL Education Malaysia, including in the past year.
- I understand this is an **annual declaration** of my ongoing suitability to work with children.
- I will **immediately inform HR or the Designated Safeguarding Lead** should any circumstances change.

### **4. Commitment to Reporting**

I understand my responsibility to report:

- Any safeguarding concerns about a student or adult in line with school policy.
- Any low-level concern or breach of the Safer Working Practices involving a colleague.
- Any risk to the safety or welfare of children, whether inside or outside of school.

**Employee Name:** \_\_\_\_\_ **Position:** \_\_\_\_\_  
**Campus/School:** \_\_\_\_\_ **Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_

(To be uploaded to HR Forms: **Thank You:** *Thank you for completing this annual safeguarding declaration. Your continued commitment to maintaining the highest standards of professional conduct and student safety is vital to our shared mission. By upholding these expectations, you help create a safe, respectful, and trusted environment where every child can thrive. Should you have any questions or need further support, please reach out to your Designated Safeguarding Lead or the HR team.*)