Policy on Safeguarding and Child Protection

Invictus International School Bukit Timah

Contact Details

SingEd Global Schoolhouse

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SLT

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1. Regulatory Framework

1.1 We comply with Singapore legislation and guidance to protect children and also incorporate United Kingdom standards. We acknowledge that our international education setting is a unique environment that requires consideration of global best practices in protecting children.

1.2 This policy is informed by the following documents:

In terms of Singapore legislation and guidance:

- Children and Young Persons Act (2001)
- Management of Child Abuse in Singapore, Ministry of Social and Family Development (2008) Penal Code (2008)
- Criminal Procedure Code (2010)
- Protection from Harassment Act (2014)
- Child Abuse Reporting Guide, Ministry of Social and Family Development (2015)
- Sector Specific Screening Guide, Ministry of Social and Family Development (2015)
- Protecting Children in Singapore, Ministry of Social and Family Development (2016)

In terms of United Kingdom standards:

- Standards for British Schools Overseas (November 2017) Department for Education, United Kingdom
- Keeping Children Safe in Education (September 2022) Department for Education, United Kingdom

In terms of international standards and global best practice:

- United Nations Convention on the Rights of the Child (1989)
- Essential Questions and Expectations to ensure the safeguarding and protection of children in schools, International Taskforce on Child Protection (2015)
- Managing Allegations of Child Abuse by Educators and Other Adults – Protocol for international schools), Council of International Schools (2018)

2. Aims

2.1 The aims of this policy are as follows:

- to actively promote and safeguard the welfare of children, staff and others who come into contact with the School.
- to actively promote the well-being of pupils.
- to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and allegations of abuse.

- to raise the awareness of all staff of their safeguarding responsibilities and how to report concerns.
- to raise awareness about how to report concerns and ensure they are appropriately investigated.
- to ensure staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and others and feel supported in this role.
- to ensure consistent good safeguarding practice throughout the School.
- to create a culture of safety, equality and protection.

3. Scope and Application

3.1 Where the terms "child" or "young person" are used in this policy, they refer to all pupils under the School's care. Where the reference to "child" or "young person" is made in the context of reports to, or consultations with, the Singapore Child Protection Service (Ministry of Social and Family Development), the Singapore Children and Young Persons Act (2001) definitions apply, where a child is defined as below 14 years old and a young person is defined as 14 years of age or above and below the age of 18 years.

3.2 This policy applies to all school activities and to out of hours and commercial activities held on the school premises.

3.3 This policy is designed to:

- provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers.
- set an organizational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly.
- have adequate safeguarding policies, procedures and measures to protect people.
- provide clarity as to how incidents and allegations will be handled should they arise.
- outline the specific obligations on the School to safeguard and promote the welfare of children.

3.4 This policy is published on the School website, available in hard copy on request, available in large print or other accessible formats if required. This policy and all policies referred to in it are also available to staff in the school policy folder on SharePoint.

4. Identifying Harm and Risk of Harm

4.1 Child protection concerns: Singapore statutory child protection concerns are matters involving direct harm or risk of harm to a child or young person (under 18 years of age) by a parent/caregiver, and/or indirect harm or risk of harm to a child or young person (under 18 years of age) as a result of a parent or caregiver's failure to care for or protect.

4.2 Pastoral concerns: the School's pastoral systems supports pupils to thrive academically, mentally, emotionally, socially, and physically. To support this our pastoral approach is centered around creating

an environment where each child is known and listened to. A nurturing approach recognises that positive relationships are central to both learning and wellbeing. Pastoral care concerns involve any concern about a child or young person's wellbeing and may involve harm or risk of harm by a parent/caregiver, peers, self, or other adults or children and young people outside the School. The success of the School's pastoral care system is largely dependent on mutual co-operation with parents. Wherever possible, the School will endeavor to work collaboratively with parents to address concerns to support their children.

4.3 The School is committed to acting in the best interests of the child to safeguard and promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.

4.4 Every pupil should feel safe and protected from any form of abuse and neglect whether in school, within the child's family or outside. The indicators of harm and risks of harm are set out in **Appendix 1.** The explanations of harm and risks of harm outlined in **Appendix 1** are provided to assist general understanding. They are not specific to a particular jurisdiction of legislation.

5 Roles and Responsibilities

5.1 SLTs

5.1.1 In accordance with Singapore guidance and United Kingdom best practice, we identify and appoint a SLT and Deputy SLT. They are responsible for receiving, assessing, investigating and coordinating protective responses to any concerns involving harm or risk of harm to children and young people.

5.1.2 During non-term time, we appoint a member of the School leadership team who is physically in Singapore to assume SLT responsibilities.

5.1.3 The SLT is a senior member of staff of the School's leadership team with the necessary status and authority to take lead responsibility for safeguarding and child protection (including online safety).

5.1.4 The SLT has the time, funding, training, resources and support to enable him / her to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the SLT are set out in **Appendix 5.**

5.1.5 The SLT takes lead responsibility for all aspects of safeguarding throughout their individual School. The SLT together with the school's directors will meet at least three times a year in a fully minuted meeting to discuss recent trends and updates.

5.1.6 The SLT has a written job description describing the responsibility and activities related to the role. See **Appendix 5.**

5.2 HR (Sing-Ed Global Schoolhouse)

5.2.1 Sing-Ed Global Schoolhouse Human Resources Department is responsible for ensuring that all recruitment is conducted to the highest possible safeguarding and child protection standards and in accordance with global best practice and Singapore law.

5.2.2 Our approach to recruitment is to identify and employ staff (including contractors and other organizations engaged by the School) who:

- share the School's commitment to its values and in particular, to caring for and protecting all children and young people in the School's care.
- understand the principles of safeguarding children and young people.

- understand and implement the principles of Safer Recruitment
- understand fully, and are willing to commit to, the Schools' Staff Code of Conduct and the Safeguarding and Child Protection Policy.

5.3 Whole School

5.3.1 We are committed to the wellbeing, care and protection of all children and young people in our care and to the continual development of staff awareness, knowledge, and skills in identifying and responding appropriately to harm and risk of harm concerns. All staff are required to report concerns about children and young people to the SLT.

5.3.2 Form tutors are responsible for contributing to, and implementing, individual wellbeing and protection case plans for children and young people as guided by the SLT.

5.4 Volunteers

5.4.1 All volunteers are expected to conduct themselves in accordance with the volunteer's agreement and are encouraged to report any concerns about a child or young person to the School's SLT staff.

5.5 Pupils

5.5.1 We recognize that sometimes pupils have concerns about their friends or other pupils and that these concerns may not be visible or obvious to adults. We encourage pupils to observe the "golden rule" - always treat others as they wish to be treated themselves and embody the school's values of respect for one another and the environment.

5.5.2 Pupils are encouraged to talk to any member of staff member they are comfortable with about their concerns for another child or young person.

5.5.3 Pupils are encouraged to talk to a member of school staff they are comfortable with about seeking help for themselves.

5.5.4 All concerns reported by pupils are taken seriously and treated with sensitivity.

6 Training

6.1 The school maintains a record of all training.

6.2 All staff (faculty and non-faculty) are required to:

- Adhere to the Staff Code of Conduct.
- Complete the School's annual Safeguarding and Child Protection Training.
- Attend refresher and best practice training updates as directed by the School.

6.3 External providers are required to:

- Complete the School's Safeguarding and Child Protection Induction Training, online or in person.
- Provide confirmation that they have read and understood the School's Safeguarding and Child Protection Policy.

6.4 SLTs are required to complete:

- Specialised training in using the Singapore Child Protective Service (Ministry of Social and Family Services) screening tools.
- SLT specialized external and/or internal training as directed by the School.
- Ongoing best practice training as directed by the School.

7 Curriculum

7.1 We aim to reiterate the School's values throughout the curriculum through integrated messages about protective behaviors, personal boundaries and self-care. This is primarily delivered through form tutors and as part of the PSHEE curriculum.

7.2 When required and in responses to topical issues our program of parent workshops provides a forum for training, information and awareness sessions and courses for the School community.

8 Safe Working Practices

8.1 Our Staff Code of Conduct provides extensive guidance about appropriate interaction with children and young people.

8.2 There are occasions when physical contact with children and young people may be necessary and/or appropriate such as: in an emergency situation, for example, to prevent a child from falling, to administer first aid, to comfort a distressed child, to assist a child or young person with a mobility difficulty, or visual or hearing impairment, to provide technical instruction in subject areas such as sport, music or other learning activities requiring instruction in fine motor skills such as teaching a child to write.

8.3 It is important to understand that any physical contact may be misconstrued or misunderstood by others or called into question. Adults should be prepared to explain their actions.

9 Reporting and Managing Concerns

9.1 Appendix 4 provides a flow chart that outlines the school's safeguarding and child protection reporting procedures.

9.2 Reporting a concern:

- 9.2.1 School employees are required to report any concerns directly to the SLT.
- 9.2.2 Parents, students, visitors or any other person wanting to report a safeguarding concern should contact the SLT or any other school employee they feel comfortable talking to.
- 9.2.3 The school acknowledges that there may be occasions where a person wishes to report a concern anonymously. The School is committed to providing care that preserves a child or young person's support network and wherever possible, and in the child's best interests, will honor a request by a person reporting to remain anonymous.

9.3 Managing disclosures:

- 9.3.1 It is important to handle any disclosure honestly, respectfully and confidentially, and to report the concern directly to the SLT.
- 9.3.2 Once the child or young person has made the disclosure, they may feel relief or increased fear that something will happen as a result. Both states may prompt the child or young person to ask you not to tell anyone about what they've told you. It is important that you explain to the child that you are unable to keep their disclosure a secret but reassure them it will remain confidential.

9.4 Initial assessment:

- 9.4.1 Upon being informed of the concern the SLT will attend to the child or young person's immediate safety, ensure that the person reporting the concern has recorded the incident on CPOMS, conduct further inquires if necessary to inform their assessment.
- 9.4.2 Decide if the concern represents a statutory child protection concern (see 4.1) or a pastoral concern (see 4.2)

6.4.5 Inform and consult with the Head of School/School directors as required. Decide on a course of action.

9.5 Reporting to external authorities:

9.5.1 Action taken in response to safeguarding and child protection concerns will be in accordance with Singapore legislation and the Child Abuse Reporting Guide (CARG) where required.

9.6 Immediate medical attention:

9.6.1 The child or young person will be attended to by the school first aider.

9.6.2 Appropriate arrangements will be made the child or young person's parents as required.

9.6.3 Emergency services will be contacted as required.

9.7 Referral to the police:

9.7.1 In accordance with Singapore law, the School is required to report the commission, or intention to commit, certain offences, including some matters relating to hurt and assault, to the Singapore Police.

9.7.2 Where the School has received information that a child or young person has been harmed by a person other than a household member, the School will usually contact the child or young person's parents and assess obligation to report to the Singapore Police as appropriate.

9.7.3 The School is required to report sexual abuse matters to the police and the Child Protective Service in accordance with the Child Abuse Reporting Guide (CARG) criteria.

9.8 Referral to the Child Protection Service:

9.8.1 We assess all statutory child protection concerns in accordance with the Child Abuse Reporting Guide that applies only to children under the age of 18 years who have been allegedly harmed or are at risk of harm by a parent/caregiver or other household member.

9.8.2 When it is unclear whether a concern meets the Singapore Child Protection Service thresholds for referral we will consult with Singapore Child Protection Services direction. Such consultations can be done initially without providing identifying detail. Where a concern does meet the threshold for referral, Singapore Child Protection Services may request identifying details.

9.9 Internal Assessment:

9.9.1 The SLT will lead and manage the internal assessment process. If a matter has been referred to, or accepted by an external authority (Police or Singapore Child Protection Services) the SLT will manage internal risk assessment, internal support and any other actions as directed by the external authority.

9.9.2 Matters requiring internal school management only will be lead by the SLT. The assessment will focus on gathering relevant information and creating accurate records that lead to an appropriate course of action that protects the children and young people involved.

9.9.3 Management of all concerns will be conducted with respect and confidentiality (as far as legally possible) and in accordance with the school's judgements about what is in the best interest of the children and young people involved.

9.9.4 The SLT, in conjunction with relevant staff, will consider:

- What support and action is in the child or young person's best interests.

- What the child or young person's wishes are.
- What the child or young person's parents' wishes are.
- What support may already be in place.
- Which school staff need to know and specifically what, and how much, information is needed in order to support the child or young person.

10 Staff Interaction with Children and Young People

10.1 Our response to concerns about staff interaction with children and young people is guided by our staff code of conduct.

10.2 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with pupils, parents, colleagues and any other person who comes into contact with the School. This guidance is contained in the code of conduct and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

10.3 The School will follow its employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.

10.3.1 All misconduct is subject to assessment, investigation and possible disciplinary action.

10.3.2 Serious misconduct include:

- Harming a child or young person (including physical, sexual and emotional abuse) or negligence resulting in harm.
- Behaving in a way toward a child or young person that may constitute an offence under Singapore or international law.
- Behaving in a way that indicates unsuitability to work with children or young people, including patterns of grooming behaviour and physical punishment or reprimand.

10.3.3 Behaviour involving interaction with children or young people that is inappropriate but on its own does not meet the threshold for Serious Misconduct.

10.4 Reporting concerns:

10.4.1 All concerns about staff member's interaction with children or young people must be reported to the SLT and or Head of School. If the concern is related to the Head of School or SLT the concern should be reported to the school's directors.

10.5 Investigation and assessment:

10.5.1 When a concern is raised about staff interaction with a child or young person, our first priority will be to secure the immediate safety of any children and young people involved and to attend to any emergency actions required.

10.5.2 All staff are required to adhere to strict principles of confidentiality in managing any concern about staff interaction with children and young people.

10.5.3 The level of the School's investigation about a concern will be commensurate with the

seriousness of the concern. The extent of information gathering will be limited to what is apropriate and necessary to ensure reasonable and fair decision making and risk management.

10.5.4 In accordance with Singapore law, the School is required to report the commission, or intention to commit, certain offences, including some matters relating to hurt and assault, to the Singapore Police.

10.6 Initial Response:

10.6.1 For matters involving Serious Misconduct, the following initial response actions should be completed within two hours of the concern being reported. Any delays should be documented. For matters involving Other Misconduct, the following initial response actions should be completed within one working day of a concern being reported. Any delays should be documented.

10.6.2 Upon receiving a concern about staff interaction with children or young people, the Head of School and/or SLT will:

- Attend to any immediate safety concerns
- Clarify the allegation/concern
- Clarify the identities of the children or young people involved
- Clarify the identity of the staff member who is subject of the concern
- Clarify when and where the alleged incidents occurred
- Decide whether the matter constitutes Serious or Other Misconduct as defined in the Staff Code of Conduct
- Consider whether the concern may constitute a criminal offence and liaise accordingly with the Sing Ed Schoolhouse Legal Director, Chief Executive Officer
- Assess initial risk and formulate an initial risk management plan

10.7 Risk assessment and management during investigation:

10.7.1 The focus of risk management will take into account:

- Risk to children and young people
- Risk to the staff member
- Risk to an appropriate investigation of the matter

10.7.2 If a matter has been referred to and accepted by an external authority (Police and/or the Singapore Child Protective Service), the School's management of the matter will be limited to internal risk assessment and management and any other actions as directed by the external authority.

10.8 Appeal:

10.8.1 The staff member who is the subject of the concern may appeal the School's decision on a matter.

10.8.2 The staff member may submit an appeal in writing to the School's directors

10.8.3 A Review Meeting should be held, to which the staff member will be invited, within 10 days of an appeal application being received.

11 Record Keeping

11.1 All staff must record any safeguarding concerns on CPOMS immediately. All prior notes should be attached to the CPOMS file, information recorded must be factual.

11.2 The SLT will ensure that the correct categories are logged and accurate records have been kept of actions taken by the school.

11.3 All records of Child Protection allegations, suspicions, or disclosures are centrally kept by the SLT on CPOMS. Electronic records are stored securely with restricted access.

11.4 For any visitors/volunteers who do not have access to a school e-mail address and computer system associated with CPOMS, a physical copy of the Concern Form is available in the staff room and at the reception. Hard copies are stored in a locked cabinet in a lockable office.

11.5 Retention of records:

11.5.1 Records are retained in accordance with Singapore law.

11.5.2 When a child or young person leaves the school, records are securely archived.

11.5.3 Records are confidentially destroyed after the subject of the record attains 25 years of age.

11.6 Access to and sharing or records:

11.6.1 Access it limited to the SLT, additional staff may be given limited access as required for a specific purpose directly related to the care and protection of a child or young person.

11.6.2 Records many only be shared in accordance with Singapore law, including the Personal Data Protection Act (2021). Records mat be shared with:

- Singapore courts of law
- Courts of law in other jurisdictions
- The Singapore Ministry for Social and Family Services Child Protective service, in accordance with Singapore Government guidance on reporting and consulting regarding child protection concerns.

KEY SCHOOL CONTACTS

Contact Details

SingEd Global Schoolhouse

Ang Pow Chew, Superintendent of Invictus International School
(email) powchew.ang@sing-ed.com.sg

SLT

Nicholas Belcher (Principal)
(tel) 65 6971 8210
(email) nicholas.belcher@invictus.edu.sg

Andrew Morse (Deputy Head of Academics)
(tel) 65 6971 8210
(email) andrew.morse@invictus.edu.sg

Alice Burke (Assistant Head of Pastoral Care)
(tel) 65 6971 8210
(email) alice.burke@invictus.edu.sg

KEY EXTERNAL CONTACTS

Please call the police at 999 immediately if the child's life is in danger.
Child Protective Service Helpline: 1800-777 0000

(Monday to Friday, 8.30am-5.30pm and Saturday, 8.30am-1pm)
Child Protective Service
SLF Podium
#01-01 to #01-09
512A Thomson Road
Singapore 298137

Child Protection Specialist Centres

Big Love Child Protection Specialist Centre
6445 0400
http://www.biglove.org.sg/contact@biglove.org.sg
Monday – Friday 9.00am – 6.00pm

HEART@Fei Yue Child Protection Specialist Centre
6819 9170

https://fycs.org/child-protection-specialist-centre/
Monday – Friday 930am – 5.30pm

Safe Space Child Protection Specialist Centre

https://www.pave.org.sg/our-services-cpsc.php
intakeCPSC@pave.org.sg
Monday – Friday 9.00am – 1.00pm; 2.00pm – 6.00pm

ComCare Hotline
1800-222 0000
Daily 7.00am – 12 midnight

INVICTUS
INTERNATIONAL SCHOOL
BUKIT TIMAH

Responsibility statement and allocation of tasks

1.1 Ang Pow Chew have overall responsibility for all matters which are the subject of this policy.

1.2 The Directors of SEGSH has nominated Ang Pow Chew to take leadership responsibility for the School's safeguarding arrangements. Contact details are set out in the School contacts list at the front of this policy.

1.3 To ensure the efficient discharge of its responsibilities under this policy, Ang Pow Chew have allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	SLT	As required
Monitoring the implementation of the policy	SLT	As required, and at least annually
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the PDPA	SLT	As required, and at least termly
Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy	SLTs	As required, and at least annually
Formal annual review	Ang Pow Chew	At least annually

2 Monitoring and review

2.1 The SLT will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with Ang Pow Chew as necessary and seeking contributions from staff. The SLT will update the Senior Management Team regularly on the operation of the School's safeguarding arrangements.

2.2 Where an incident involving a member of staff occurs, the Designated Officer will be asked to assist in reviewing the School's procedures to determine whether any improvements can be made. Any shortfalls in regard to safeguarding arrangements at any time will be remedied without delay.

2.3 The SLT will report to Ang Pow Chew to raise any topics of interest and summarise the School's safeguarding practices over the year.

2.4 The SLT will work with Ang Pow Chew to prepare a written annual monitoring report commissioned by the directors of SEGSH. The written report should address how the School ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters.

2.5 Ang Pow Chew will review the report, this policy and the implementation of its procedures, including good cooperation with local agencies and the efficiency with which the related duties have been discharged. Ang Pow Chew should also consider independent corroboration, such as:

2.5.1 inspection of records or feedback from external agencies including the Designated Officer;

2.5.2 reports of Invictus Cambridge inspections;

2.5.3 the outcome of any relevant parental complaints; and

2.5.4 press reports.

2.6 Ang Pow Chew will consider the proposed amendments to this policy before giving the revised policy its final approval. Detailed minutes recording the review by Ang Pow Chew will be made.

Appendix 1: Indicators of abuse

1 Types of abuse

1.1 Part 1 of KCSIE defines the following indicators of abuse and neglect, however, staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.

1.2 **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

1.3 **Physical abuse:** 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.

1.4 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child 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 a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying and prejudice-based bullying), 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, although it may occur alone.

1.5 **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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

1.6 **Neglect:** 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, for example, 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); or ensure

access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

2 Signs of abuse

2.1 Possible signs of abuse include, but are not limited to:

2.1.1 the pupil says they have been abused or asks a question or makes a comment which gives rise to that inference;

2.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;

2.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;

2.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

2.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general well-being;

2.1.6 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;

2.1.7 the pupil is reluctant to go home, or has been openly rejected by their parents or carers; and

2.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

2.2 The Family and Adult Support Tool (FAST) and the Ministry of Social and Family Development (MSF) Singapore provides guidelines in identifying child abuse.

3 Specific safeguarding issues

3.1 Best practice acknowledges the following as specific safeguarding issues:

3.1.1 children and the court system;

3.1.2 children missing from education (see section 3.3 below);

3.1.3 children with family members in prison;

3.1.4 child sexual exploitation (see section 3.4 below);

3.1.5 child criminal exploitation and gang activities (see section 3.5 below);

3.1.6 domestic abuse;

3.1.7 homelessness;

3.1.8 so-called 'honour-based' violence (see section 3.6 below);

3.1.9 preventing radicalisation (see section 3.7 below);

3.1.10 peer on peer abuse (see section 3.8 below);

3.1.11 sexual violence and sexual harassment between children in schools and colleges (see section 3.9 below).

3.2 Staff should be particularly aware of the safeguarding issues set out below.

3.3 **Children missing from education**

3.3.1 Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

3.3.2 Where reasonably possible the school will hold more than one emergency contact for each pupil in order to ascertain whether a child is missing.

3.4 **Child sexual exploitation (CSE)**

3.4.1 Child sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

(a) in exchange for something the victim needs or wants; and / or

(b) for the financial advantage or increased status of the perpetrator or facilitator.

3.4.2 The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

3.4.3 Signs of potential CSE include:

(a) going missing or regularly returning late

(b) regularly missing school or opting out of education

(c) appearing with unexplained gifts / possessions

(d) associating with others involved in exploitation

(e) older boyfriends / girlfriends.

3.4.4 **Reporting CSE:** Report cases to Singapore Child Protection Services and local police.

3.5 **Child criminal exploitation**

3.5.1 Criminal exploitation of children is a geographically widespread form of harm: drug networks or gangs groom and exploit children and young people to carry drugs and money. Key to identifying potential involvement are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Forms of abuse and exploitation:

(a) can affect any child or young person (male or female) under the age of 18 years;

(b) can affect any vulnerable adult over the age of 18 years;

(c) can still be exploitation even if the activity appears consensual;

(d) can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;

(e) can be perpetrated by individuals or groups, males or females, and young people or adults; and

(f) is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

3.5.2 Signs of potential involvement with gangs are:

(a) Persistently going missing from home/school and/or being found away from their local area.

(b) Unexplained acquisition of money, clothes or mobile phones.

(c) Multiple mobile phones and/or excessive receipt of texts/calls.

(d) Relationships with controlling, usually older, individuals or groups.

(e) Leaving home/care without explanation.

(f) Unexplained injuries.

(g) Carrying weapons.

(h) Significant decline in school attendance and achievement.

(i) Gang association or isolation from peers or social networks.

(j) Significant changes in emotional well-being.

3.6 **Honour-based violence**

3.6.1 All forms of so-called honour-based violence are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the SLT if they have any doubts.

3.6.2 If appropriate, the SLT will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and Singapore Child Protection Services.

3.7 **Radicalisation**

3.7.1 The School has a duty to have due regard to the need to prevent people from being drawn into terrorism.

3.7.2 The School aims to build pupils' resilience to radicalisation by promoting fundamental values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

3.7.3 There is no single way of identifying an individual who is likely to be susceptible an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through may different methods (such as social media) and settings (such as the internet).

3.7.4 It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the SLT making a referral to Singapore Child Protection Services.

3.8 **Peer on peer abuse**

3.8.1 Some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised.

3.8.2 Safeguarding issues can manifest themselves via peer on peer abuse. This includes, but is not limited to:

(a) bullying (including cyber-bullying);

(b) physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;

(c) sexual violence and sexual harassment;

(d) upskirting;

(e) sexting (also known as youth produced sexual imagery); and

(f) initiation / hazing type violence and rituals.

3.8.3 Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. The School recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviours can occur online and offline (both physical and verbal), are never acceptable and may be criminal. See also 3.9 below.

3.8.4 All peer on peer abuse is unacceptable and will be taken seriously. The School takes steps to minimise the risk of all types of peer on peer abuse. The School has robust anti-bullying procedures in place pupils are taught at all stages of the School about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and kept under review. Appropriate action is taken to protect pupils identified as being at risk including the particular vulnerabilities of those with a special educational need or disability (see the School's *risk assessment policy for pupil welfare*).

3.8.5 Abusive behaviour by pupils must be taken seriously. Behaviour should not be dismissed as being normal between young people, as "banter", “just having a laugh” or simply "part of growing up". Behaviour such as initiation violence or any form of sexual violence or sexual harassment is not acceptable.

3.9 **Sexual violence and sexual harassment between children**

3.9.1 Sexual violence and sexual harassment can occur between two or more children of any age or sex. They can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

3.9.2 Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. The School will respond to allegations seriously and all victims will be offered appropriate support.

3.9.3 The School is aware of the importance of:

(a) making it clear to pupils that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;

(b) not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

(c) challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

3.9.4 References to **sexual violence** are references to sexual offences under Singapore’s Penal Code Act, specifically rape, assault by penetration and sexual assault.

3.9.5 References to **sexual harassment** mean "unwanted conduct of a sexual nature" that can occur online and offline. In the context of child on child sexual harassment, it is likely to: violate a child's dignity; and / or make them feel intimidated, degraded or humiliated; and / or create a hostile, offensive or sexualised environment.

3.10 **Sexting**

3.10.1 "Sexting" means the taking and sending or posting of images or videos of a sexual or indecent nature, usually through mobile picture messages or webcams over the internet.

3.10.2 The School treats all incidences of sexting as safeguarding matters to be actioned in accordance with this policy.

3.10.3 Members of staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.

3.10.4 The SLT may in exceptional circumstances view images with the prior approval of a Director of SEGSH or Gan Chin Huat and only where:

(a) it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;

(b) it is necessary to report the image to a website or agency to have it taken down; or

(c) a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.

3.10.5 Where viewing an image is unavoidable:

(a) viewing should take place on School premises wherever possible;

(b) the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);

(c) a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;

(d) full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;

(e) any member of staff who views an indecent image should be given appropriate support.

3.10.6 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

3.10.7 If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

3.10.8 If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

3.10.9 If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided).

3.10.10 Where a pupil receives unwanted images, the School should advise the pupil and his / her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.

3.10.11 Advice for pupils and parents is available from:

The Media Literacy Council at https://www.betterinternet.sg/

4 Special educational needs and disabilities

4.1 The School welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone.

4.2 Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:

4.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration;

4.2.2 pupils with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and

4.2.3 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

5 Looked after children and previously looked after children

5.1 Ang Pow Chew ensure that staff have the skills, knowledge and understanding to keep looked after children safe and that appropriate staff have the information they need in relation to a child's looked after legal status, for example:

5.1.1 whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;

5.1.2 contact arrangements with birth parents or those with parental responsibility;

5.1.3 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

5.2 The SLT maintains these details, including contact details of the child's social worker.

6 Care leavers

6.1 The SLT maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

7 Mental health

7.1 The School is committed to promoting wellbeing and resilience alongside raising awareness of and eliminating the stigma attached to mental illness. Incidences of depression, self-harm and eating disorders have all risen in recent years and are all linked to poor mental health.

7.2 Advice for pupils and parents is available at:

https://www.healthhub.sg/live-healthy/419/boosting_childs_mental_wellbeing

https://www.chat.mentalhealth.sg/get-the-facts/eating-disorder/

https://www.healthhub.sg/live-healthy/1179/helping-youth-fight-depression

https://www.chat.mentalhealth.sg/get-the-facts/self-harm/

Appendix 2: Concerns about a child - guidance for staff

1 **Receiving a disclosure**

1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.

1.2 Do not ask leading questions, i.e. a question which suggests its own answer.

1.3 Reassure the pupil but do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken. This will involve professional judgement, but where doubt exists, the information must be passed on in accordance with this policy.

1.4 Keep a sufficient written record of the conversation completed at the earliest possible time (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.

1.5 Pass on the record when reporting the concern in accordance with this policy.

2 **Recording a concern**

2.1 Staff must record all concerns in writing.

2.2 Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:

2.2.1 the pupil's details: name and date of birth;

2.2.2 date and time of the event / concern / conversation;

2.2.3 the action taken and by whom with reasons for decisions made;

2.2.4 the name and position of the person making the record.

2.3 The concern should be recorded on CPOMS. The record can be completed after an initial discussion with the SLT and completed with the SLT where appropriate.

2.4 Where the allegation or complaint is made by an adult, the SLT will ask for a written and signed statement from that person and inform them that their evidence may be passed on to a third party. If, after due consideration, the School decides to pass the information on to an outside agency in accordance with this policy, the SLT will contact the disclosing party (unless the School is advised otherwise by that agency) to inform them of this and that they should expect further contact from the agency.

3 **Receiving a report of harmful sexual behaviour**

3.1 Additional guidance about how to manage a report of harmful sexual behaviour :

3.1.1 Only record the facts as the child presents them.

3.1.2 Where the report includes an online element, do not view or forward illegal images of a child.

3.1.3 Manage reports with another member of staff present (preferably the SLT or), if possible.

3.2 Inform the SLT as soon as practically possible if the SLT is not involved in the initial report.

4 Use of reasonable force

4.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. 'Reasonable' in these circumstances means using no more force than is needed.

4.2 Staff should refer to the School's *code of conduct* for more detailed guidance about the use of reasonable force.

Appendix 3: Dealing with allegations against staff

1 **The School's procedures**

1.1 The School's procedures for dealing with allegations made against staff will be used where the member of staff has:

1.1.1 behaved in a way that has harmed a child, or may have harmed a child;

1.1.2 possibly committed a criminal offence against or related to a child; or

1.1.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she work regularly or closely with children.

1.2 Any allegations not meeting these criteria will be dealt with in accordance with Singapore's Penal Code Act. Advice from the Designated Officer will be sought in borderline cases.

1.3 All such allegations must be dealt with as a priority without delay. The local authorities will be informed immediately and in any event within one working day of all allegations that come to the School's attention and appear to meet the criteria in paragraph 1.1 above.

1.4 Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police and MOM.

2 **Reporting an allegation**

2.1 An allegation or complaint against **any member of staff** should be reported immediately to the Principal. If the Principal is unavailable, the allegation or complaint should be reported to Ang Pow Chew.

2.2 An allegation or complaint against **the Principal of the School** should be reported immediately to Ang Pow Chew.

2.3 If it is not possible to report to any of the individuals set out above, a report should be made immediately to the SLT. The SLT will take action in accordance with these procedures and will as soon as possible inform the Principal of the School. or, where appropriate, Ang Pow Chew.

2.4 The person taking action in accordance with the procedures in this Appendix is known as the **Case Manager**. In all cases, the Case Manager will discuss the allegation immediately with the local authorities before further action is taken.

3 **Disclosure of information**

3.1 The Case Manager will inform the accused person of the allegation as soon as possible after the Designated Officer has been consulted.

3.2 The parents or carers of the child / children involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

3.3 Where the local authorities advise that a strategy discussion is needed, the Case Manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

3.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

4 Further action to be taken by the School

4.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The School will take action in accordance with the School's employment procedures.

5 Ceasing to use staff

5.1 If the School ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement agreement will not be used and a referral to human resources will be made promptly. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to Ang Pow Chew without delay.

5.2 If a member of staff tenders their resignation, or ceases to provide their services at a time when child protection concerns exist in relation to that person, those concerns will still be followed up by the School in accordance with this policy and a referral to human resources. The appropriate agencies will also be informed. promptly.

6 Malicious allegations

6.1 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the School's *behaviour and discipline policy*.

6.2 Where a parent has made a deliberately invented or malicious allegation the Principal will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

6.3 Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the local authorities to determine whether any action might be appropriate.

7 Record keeping

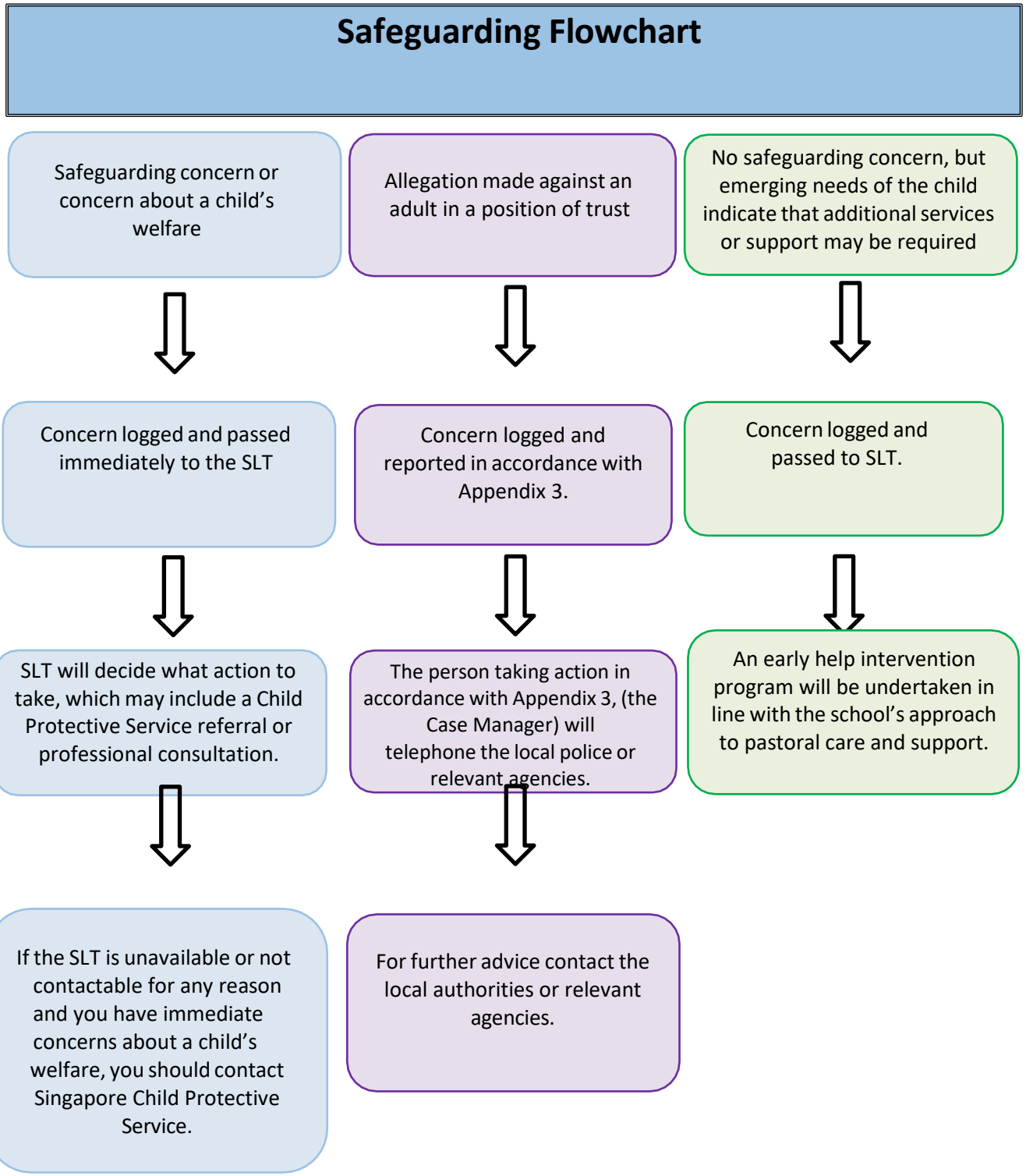
7.1 Details of allegations found to be malicious will be removed from personnel records.

7.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused.

7.3 An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with KCSIE, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

7.4 The School will retain all safeguarding records and relevant personnel records for so long as reasonably required.

Appendix 4: Safeguarding Flowchart



Appendix 5: Responsibilities of the SLT (SLT)

1 The name and contact details of the SLT is set out in the contacts list at the front of this policy.

2 The main responsibilities of the SLT are:

2.1 **Managing referrals**

2.1.1 The SLT is expected to:

(a) refer cases of suspected abuse to Singapore Child Protection Services or relevant agencies as required;

(b) support staff who make referrals to Singapore Child Protection Services or relevant agencies;

(c) refer cases to the relevant agencies where there is a radicalisation concern as required;

(d) support staff who make referrals to relevant agencies where there is a radicalisation concern as required; and

(e) refer cases where a crime may have been committed to the police as required.

2.2 **Work with others**

2.2.1 The SLT is expected to:

(a) act as a point of contact with relevant agencies;

(b) liaise with the Ang Pow Chew to inform him of issues especially ongoing enquiries from Singapore Child Protection Services and police investigations;

(c) as required, liaise with the Case Manager (see 0 of this policy) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;

(d) liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENCOs / named person with oversight for SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;

(e) act as a source of support, advice and expertise for staff.

2.3 **Raise awareness**

2.3.1 The SLT should:

(a) ensure the School's *safeguarding and child protection policy* and processes are known, understood and used appropriately;

(b) ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with Ang Pow Chew regarding this;

(c) ensure this policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the School in this;

(d) link with human resources to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

2.4 **Training**

2.4.1 The SLT has undertaken training to provide them with the knowledge and skills required to carry out the role. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

(a) understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;

(b) have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

(c) ensure each member of staff has access to and understands the School's *safeguarding and child protection policy* and procedures, especially new and part-time staff;

(d) are alert to the specific needs of children in need, those with special educational needs and young carers;

(e) understand relevant data protection legislation and regulations, especially the Singapore Personal Data Protection Act (2021);

(f) understand the importance of information sharing, both within the school, and with relevant agencies, organisations and practitioners;

(g) are able to keep detailed, accurate, secure written records of concerns and referrals;

(h) are able to provide advice and support to staff on protecting children from the risk of radicalisation;

(i) are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;

(j) can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;

(k) obtain access to resources and attend any relevant or refresher training courses;

(l) encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.