Safeguarding and Child Protection Policy

Every pupil should feel safe and protected from any form of abuse, which, in this policy, means any kind of neglect, physical, emotional, sexual abuse, exploitation, or ill-treatment. Pupils can turn to any member of staff for help; these include Housemasters and Housemistresses, Beaks, Heads of Year, tutors, Form tutors, the College Medical staff, the safeguarding team, and the College Counsellor, all of whom have additional skills and training for handling pastoral concerns.

The College aims to raise pupils' awareness of Safeguarding issues through induction, pastoral care and the curriculum. Pastoral care and College policies ensure that pupils have a range of contacts and strategies for their own protection and an understanding of the importance of protecting others.

In performing its safeguarding duties and when responding to safeguarding situations, the College will consider at all times what is in the best interest of the child.

Within this policy and in all related matters, the College uses the term 'safeguarding' to refer to the overall preventative framework in place to care for the welfare of pupils and the term 'child protection' to refer to the response to cases in which the welfare of a specific pupil or pupils is of concern. Thus 'safeguarding' is generally viewed as proactive and 'child protection' as reactive.

College Details:

- Designated Safeguarding Lead: Head of Pastoral Care
- Deputy Designated Safeguarding Leads: Prep School Deputy Head Pastoral, Head of Pre Prep, Senior School Deputy Head Pastoral and HR Manager.
- Member of Council with responsibility for Child Protection: Mr Richard Fleck

A pupil-friendly version of this policy is available in Appendix 1.

1. Introduction

1.1. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002; and in line with government publications the Teachers' Standards 2012, 'Working Together to Safeguard Children' 202G, 'Keeping Children Safe in Education' September 202G, along with our accreditation bodies COBIS and BSO.

1.2. Marlborough College Malaysia (the College) fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children.

1.3. Our policy applies to all full-time and part-time teaching and support staff, Council (governors), temporary staff and volunteers working in the College.

1.4. The policy applies wherever staff or volunteers are working with pupils even where this is away from the College, for example at an activity centre or on an educational visit.

1.5. There are five main elements to our policy:

i. Ensuring we practice safer recruitment in checking the suitability of staff and volunteers to work with children;
ii. Raising awareness of child protection issues and equipping children with the skills needed to keep them safe;
iii. Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse, neglect and exploitation;
iv. Supporting pupils who have been identified as in need of early help or at risk of harm;
v. Establishing a safe environment in which children can learn and develop.

1.6. Marlborough College Malaysia's safeguarding procedures apply to all pupils, including pupils aged 18 and over. Our policy is to take all reasonable measures to improve the well-being of each child and young person (pupil) in our care.

1.7. Safeguarding is everybody's responsibility. The College recognises that staff at the College play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a pupil, staff members must always act in the best interests of the pupil. We recognise that because of the day to day contact with children, College staff are well placed to identify concerns early and to observe the outward signs of abuse, neglect and exploitation. The College will therefore:

i. Establish and maintain an environment where children feel safe, secure, valued and respected and are encouraged to talk, believing they will be listened to and their points of view valued;
ii. Ensure children know that there are adults in the College whom they can approach if they are worried;
iii. Include opportunities in the curriculum, specifically through Wellbeing and allocated Form/Tutor time for children to develop the skills they need to recognise and stay safe both mentally and physically from abuse and to know who they should turn to for help.

1.8 We seek to ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect children from harm. To this end we will:

i. Ensure there are systems in place for children to express their views and give feedback e.g. through College/House councils, pastoral questionnaires and Wellbeing surveys completed by pupils, participation in anti-bullying and online-safety events;
ii. Ensure that the child's thoughts/wishes and feelings are sought and recorded on all referrals.

2. Procedures

2.1 We will follow guidance issued by the UK Department for Education (DfE) and the Malaysian Departments of Education and of Welfare.

2.2 The College does:

i. Ensure it has a senior leader nominated as Designated Safeguarding Lead (DSL) who has received appropriate training and support for this role;

ii. Ensure it has at least one member of staff who will act in the absence of the DSL (Deputy DSL);
iii. Ensure it has a nominated governor responsible for safeguarding children;
iv. Ensure every member of staff (including temporary and supply staff and volunteers) and the Council knows the name of the DSL and any deputies and understands their role and how to contact them.
v. Ensure that the DSL and/or a Deputy DSL is available to speak to during College hours and has made adequate and appropriate cover arrangements for any out of hours/out of term time activities;
vi. Ensure all staff and volunteers are alert to the potential need for early help and aware of those children whose vulnerabilities may indicate a greater need and are aware of the role they may play in supporting other agencies and professionals in an early help assessment;
vii. Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse neglect and exploitation, including the specific issues of child on child abuse, Child Sexual Exploitation (CSE), Children Missing Education (CME), Radicalisation and Extremism and Sexual Violence and Sexual Harassment, and maintain an attitude of 'it could happen here';
viii. Ensure all staff and volunteers understand their responsibility for referring any concerns to the DSL, or Deputy DSL in a timely manner and are aware that they may raise concerns directly with Department of Social Welfare (Jabatan Kebajikan Masyarakat - JKM) if they believe their concerns have not been listened to or acted upon;
ix. Operate a vettings policy which ensures the suitability of adults working with children on College sites at any time;
x. Ensure that community users organising activities for children are aware of, and understand the need for compliance with the College's Safeguarding procedures;
xi. Ensure that the duty of care towards its pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice;
xii. Ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines;
xiii. Ensure that a referral is made to the DBS and/or appropriate national regulating body (in the UK, the Teachers Regulation Agency and in Malaysia reporting to the Malaysian Ministry of Education or local police) if a person in regulated activity has been dismissed or suspended or removed from regulated activity where the harm criterion is met, or would have been had they not resigned;
xiv. Operate safer recruitment practice, ensuring that at least one member on every recruitment panel has completed safer recruitment training within the last 2 years.

2.3 All staff undertake a safeguarding induction and are provided with a copy of this policy, the Staff Code of Conduct, and Part one of Keeping Children Safe in Education (KCSIE) DfE 202G;

2.4 Our procedures will be regularly reviewed and updated annually unless an incident or new legislation or guidance requires the need for an interim review. We recognise the expertise our staff builds by undertaking safeguarding training and managing safeguarding concerns on a daily basis. We therefore invite relevant staff to contribute to and shape this policy and associated safeguarding arrangements.

2.5 Reporting Procedure:

i. A member of staff needs only reasonable cause for concern in order to act. One sentence from a child indicating abuse, neglect or exploitation or non-accidental injury provides reasonable grounds and is sufficient need to act. This may also apply if clear information comes from another child or adult.

ii. The member of staff must report the matter on CPOMS and where applicable follow up with a conversation with the DSL or DDSL as soon as possible, unless it is an allegation against a member of staff or volunteer in which case the procedures set out in section 18 should be followed. The CPOMS incident should be recorded as soon as is reasonably possible or by the end of the end of the day.

iii. If a child is in immediate danger or at risk of harm, the DSL must be informed

3. Training

3.1 When staff join Marlborough College Malaysia they will be informed of the safeguarding arrangements in place. All staff will be given a copy of this policy and Part 1 KCSIE 2026 which contains important additional information about specific forms of abuse and safeguarding issues. In compliance with the removal of Annex A from KCSIE, all full-time, part-time, teaching, and support staff (including operational and administrative) are required to read, understand, and demonstrate professional confidence in Part 1 of Keeping Children Safe in Education. The College will track this compliance dynamically via internal tracking systems

3.2 All staff will receive induction in safeguarding children and will have access to the Safeguarding Policy, the staff code of conduct and the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). All staff are required to complete a self declaration form annually which also acknowledges they have read and understood the safeguarding policy and code of conduct.

3.3 The induction programme will include basic child protection information relating to signs and symptoms of abuse, neglect and exploitation, how to manage a disclosure from a child, when and how to record a concern about the welfare of a child and advice on safe working practice.

3.4 All volunteers, temporary staff and regular visitors to our College will be told where our policy is kept, given the name of the DSL and deputy/ies and informed of the College's procedures in reporting concerns.

3.5 All staff will receive training in safeguarding and safe working practice, on an annual basis and the College will evaluate the impact of this training. Training will include signs and symptoms of abuse , neglect (including affluent neglect), and exploitation as well as specific safeguarding issues, child on child abuse, including sharing nudes and semi-nudes and sexual violence and sexual harassment. The training includes online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the misuse of AI tools. Training will also include how to record and report abuse, neglect and exploitation.

3.G All regular visitors, temporary staff and volunteers to the College are directed to the safeguarding policy online and they will be informed of who our DSL and/or other staff responsible for safeguarding are, and what the reporting system is at the point of signing in.

3.7 The Member of Council responsible for safeguarding will also undertake appropriate training in order to be equipped with the knowledge to provide strategic challenge, to test and be satisfied that the safeguarding policies and procedures in place are effective, and to support the delivery of a robust whole College approach to safeguarding.

3.8 The Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead have undertaken child protection training and will attend refresher training at two-yearly intervals in order to:

i. understand the assessment process for providing early help and intervention;
ii. ensure that each member of staff has access to and understands the College's child protection policy and procedures, especially new and part-time staff;
iii. be alert to the specific needs of children in need, those with special educational needs, and cultural awareness to safeguarding concerns, including affluent neglect.
iv. be able to keep detailed, accurate, secure written records of concerns and referrals;
v. obtain access to resources and attend any relevant or refresher training courses;
vi. encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them and to meet the statutory requirements or recommended practice.

4. Responsibilities

4.1 The College Council will nominate at least one member to take leadership responsibility for safeguarding children and liaise with the DSL and/or Master in matters relating to safeguarding. It will ensure that:

i. the DSL takes lead responsibility for safeguarding and child protection and does not delegate this responsibility;
ii. safeguarding policies and procedures are in place and are reviewed at least annually;
iii. safeguarding responses are put in place in cases where children go missing from education;
iv. mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One of Keeping Children Safe in Education 202G;
v. the Council's Pastoral Committee maintains termly oversight of safeguarding and child protection in practice;
vi. an annual report on the effectiveness of the College's safeguarding procedures is presented to the Council;
vii. any weaknesses brought to its attention relating to safeguarding are remedied without delay;
viii. it complies with all legislative duties including the duty to report suspected or known cases of young people being drawn into terrorism as identified in our Prevent Duty risk assessment.

4.2 The Master will ensure that:

i. The Safeguarding policies and procedures are fully implemented and followed by all staff;
ii. Sufficient funding, support, time and resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to safeguarding and child protection;
iii. All staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedures;
iv. All allegations of abuse, neglect and exploitation are reported in a timely manner.

4.3 The DSL will co-ordinate action and risk assessments for safeguarding and promoting the welfare of children within the College setting. The DSL is responsible for:

i. Organising safeguarding induction training for all newly appointed staff, whole staff training, refreshed with annual updates;
ii. Providing a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part One of Keeping Children Safe in Education;
iii. Undertaking, in conjunction with the Master and Safeguarding Council member, an annual audit of safeguarding procedures.
iv. Referring a child to the appropriate authorities when there are concerns about possible abuse,

neglect and exploitation involvement in a crime, radicalisation or involvement in extremist groups;

v. Liaising with the Master to ensure that he is informed of all child protection issues and police investigations;

vi. Liaising with other staff (for example pastoral staff, Health Centre staff, College Counsellor, and the Head of Learning Enrichment) on matters of safety and safeguarding and when deciding whether to make a referral ;

vii. Keeping records of concerns about children, within CPOMS;

viii. Monitoring unexplained or persistent absence, particularly where children go missing on repeated occasions, reporting concerns in line with 'missing children' procedures;

ix. Developing effective links with relevant agencies and other professionals and co-operating as required with their enquiries regarding safeguarding matters;

x. Acting as a source of support, advice and expertise for all staff.

xi. Regularly reviews the school's filtering and monitoring logs

5. Procedures for Managing Concerns

5.1 Our College adheres to safeguarding procedures that have been agreed internationally through the Council of British International Schools. Where we identify children and families in need of support, we will carry out our responsibilities in accordance with UK and Malaysian legislation and best international practice and international law.

5.2 Every member of staff, including volunteers working with children at our College, is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy. They should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

5.3 Pupil Supervision, Registration, and Attendance Monitoring: Marlborough College Malaysia maintains robust systems to monitor pupil whereabouts and ensure proper supervision at all times. In accordance with Keeping Children Safe in Education (KCSIE), the College treats attendance, punctuality, and registration data as key indicators of pupil welfare and safety.

- Supervision Expectations & Ratios:
    - Pupils are supervised during all scheduled academic, pastoral, and co-curricular activities taking into account pupil age, numbers, needs, location, and activity risk.
    - Day pupil supervision on campus is provided during official school hours (08:00–16:15 weekdays; until 13:00 on Saturdays for Sixth Form) and during pre-booked before/after-school activities supervised by staff.
    - High-risk specialist areas (e.g., Science Laboratories, Design & Technology rooms) strictly require direct adult (beak) supervision at all times.
    - Where senior pupils exercise supervisory responsibilities over younger peers, an adult staff member remains readily available and retains overall responsibility.
    - EYFS children will only be released at the end of the day to authorised adults specified by parents/guardians on iSAMS. Explicit written permission is required if an unauthorised adult is collecting an EYFS pupil. Mandatory statutory staff-to-child ratios are strictly maintained at all times, including during outdoor play and co-curricular sessions.
    - 24/7 medical cover (nurses) and security staffing are active across the campus.
- Boarding House Supervision:

  - Boarding Houses maintain continuous adult presence (HM, Deputy HM, Resident Tutor, or Dame).
  - Overnight staff absences require advance approval from the Head of Pastoral Care and confirmed supervisory cover.
- For comprehensive procedures on registration and supervision including absence coding descriptions refer to the registration and supervision policy.
- All staff have access to CPOMS, the College's secure electronic system for recording safeguarding and child protection concerns, with access restricted based on sensitivity. Staff can seek guidance from the DSL and must record all decisions, including the rationale to monitor a situation. All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often, however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse, neglect and exploitation. In these circumstances, it is crucial that staff record the concern on CPOMS, in accordance with this policy, to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect. Staff must remain alert to indicators that a pupil may benefit from Early Help. In alignment with KCSIE 202G, the DSL team will track pupils who are repeatedly removed from academic lessons for behavioral concerns or who require a temporary part-time timetable, treating these circumstances as potential indicators of underlying safeguarding or mental health vulnerabilities

5.4 It is not the responsibility of College staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on via CPOMS in accordance with the procedures outlined in this policy.

5.6 The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our College. Any member of staff or visitor to the College who receives a disclosure of abuse, neglect or exploitation or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the Deputy Designated Safeguarding Lead. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

5.7 All concerns about a child or young person should be reported without delay and records kept on CPOMS. A safeguarding record should be a clear and comprehensive summary of the concerns. It should provide details of how the concern was followed up and resolved and a note of any action taken, decisions reached, and the outcome. The Safeguarding team will then ensure visibility of sensitive information to the staff (and any other parties) who need to know in order to support the child.

5.8 Referrals do not require parental consent.

5.9 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice as required. All information and actions taken, including the reasons for any decisions made, will be fully documented on CPOMS.

5.10 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Master or the Chair of College Council.

6. Safeguarding and promoting the welfare of children is everyone's responsibility

G.1 Everyone who comes into contact with children and their families has a role to play. To fulfil this responsibility effectively, all practitioners should make sure their approach is child-centered. This means that they should consider, at all times, what is in the best interest of the child.

G.2 No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt action.

7. Specific Safeguarding Issues

7.1 Child-on-Child Abuse (including harassment and violence). We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. Marlborough College Malaysia recognises that abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Marlborough College Malaysia also recognises the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys will be perpetrators), but that all child on child abuse is unacceptable and will be taken seriously. The different forms child on child abuse can take are:

i. sexual violence and sexual harassment verbal, physical or online;
ii. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
iii. sharing nudes and semi-nudes (also known as youth produced sexual imagery)
iv. bullying (including cyber bullying);
v. gender-based violence/sexual assaults and sharing nudes and semi-nudes;
vi. initiation rituals.

Staff, and particularly the DSL, should always consider the context in which such incidents and/or behaviours occur. Where the abuse is physical, verbal, bullying or cyber-bullying, recording of such incidents and sanctions will be applied in line with our Behaviour Expectations Policy and Counter Bullying Policy.

Serious Violence Threshold: Staff must immediately report via CPOMS if a pupil expresses any verbal, digital, or written intent to carry, possess, or use a weapon, enabling early DSL intervention and de-escalation protocols before a physical event occurs.

7.2 Special Educational Needs and Disability (SEND). The College recognises that children with special educational needs (SEN) and disabilities can face additional safeguarding risks and challenges. The Head of Learning Enrichment leads support to pupils in this area and liaises with the Safeguarding Team to ensure coordinated action. The action is coordinated through the Welfare Team, which is made up of: DSL, the Head of the Health Centre, College Counsellor and the Head of Learning Enrichment.. Specific challenges exist in recognising abuse, neglect and exploitation in this group of children. These can include:

i. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
ii. being more prone to peer group isolation than other children;

iii. the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
iv. communication barriers and difficulties in overcoming these barriers. We will always consider extra pastoral support for children with SEND to address these additional challenges.

7.3. The teaching of Relationships and Sex Education (delivered in-house and in regularly timetabled lessons during Wellbeing) will cover relevant topics in an age and stage-appropriate way, enabling pupils to learn about their rights and responsibilities, helping them to behave and stay safe in a variety of contexts on and offline. This will provide further reinforcement to help children identify risks, know when to seek support, and develop the skills to ask for help from trustworthy, reliable sources.

7.4 Child Sexual Exploitation (CSE). We recognise that CSE is a form of child abuse involving criminal behaviours against children and young people which can have a long-lasting adverse impact on a child's physical and emotional health. Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people. Victims can be boys or girls. It may also be linked to child trafficking. The College addresses the risks of sexual exploitation in the Wellbeing curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse. All staff, volunteers and governors are made aware of the indicators of sexual exploitation, the fact that the victim may have been sexually exploited even if the sexual activity appears consensual and that it does not always involve physical contact but can occur through the use of technology. All concerns of CSE are reported immediately via CPOMS to the DSL or DDSL, as the CSE leads.

7.5 'Honour Based' Violence. We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of so-called 'honour-based' violence (HBV) and we provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBV they should inform the DSL. There is a Prevent Duty risk assessment in place which is updated at least annually.

7. G Radicalisation and Extremism. We recognise that children are vulnerable to extremist ideology and radicalisation. We recognise that safeguarding against radicalisation and extremism (including gender based views) is no different to safeguarding against any other vulnerability in today's society. We will ensure that:

i. Through training, staff, volunteers and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in College and how to respond when concerns arise.
ii. There are systems in place for keeping pupils safe from extremist material when accessing the internet in our College by using effective filtering and usage policies. The College has in place appropriate IT filters and monitoring systems to enable us to identify and, where appropriate, limit children's exposure to online extremist material. However, we aim to ensure that "over-blocking" does not lead to unreasonable restrictions that could compromise learning.
iii. Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils. We encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

7.7 Domestic Abuse. We recognise that exposure to domestic abuse and/or violence (where a child may see, hear or experience its effects) can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family

home as a result. Domestic abuse affecting young people can also occur within their personal relationships as well as in the context of their home life. We will ensure that our pupils are educated to ensure they understand what a healthy relationship looks like. Crucially, we recognise that domestic abuse crosses all socioeconomic and cultural boundaries. It is a misconception that abuse only occurs in specific demographics; in wealthier or highly private communities, abuse is frequently non-physical and highly covert.

To ensure comprehensive safeguarding, our staff must be vigilant to the following dynamics:

- Coercive Control: A psychological pattern of behavior including acts of violence, threats, humiliation, and intimidation used by a perpetrator to harm, punish, or frighten their victim. This includes micromanaging daily routines, isolating the victim from support networks, and exploiting cultural or religious expectations regarding family dynamics and reputation.
- Financial & Economic Control: The restriction of a victim's financial independence. In affluent settings, this often manifests not as a total lack of money but as a total lack of autonomy. Perpetrators may strictly control access to family assets, mandate detailed tracking of expenditures, use wealth as a tool of intimidation, or restrict a partner or young person's access to independent transport, employment, or education.

Culturally, these behaviors may not be openly acknowledged or discussed by the family or the student due to stigma, fear of community ostracisation, or deep-seated shame. We are committed to dismantling these barriers by training our staff to identify these subtle indicators and by providing a safe, confidential space for students to seek support.

7.8. Children Missing Education (CME). We recognise that a child going missing from education is a potential indicator of abuse, neglect or exploitation.

i. We will make every attempt to obtain more than one emergency contact number for each child registered at the College to ensure we are able to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.
ii. We will ensure that we follow these procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse, neglect or exploitation, including sexual exploitation, and to help prevent the risks of their going missing in future.

7.9 Monitoring Attendance. The College explicitly recognises that unexplained, frequent, or persistent absence, including severe attendance drops, persistent lateness, and unauthorised leave,can be an early indicator of underlying pastoral vulnerabilities, abuse, neglect, or mental health concerns. Daily attendance monitoring is an essential component of our proactive safeguarding framework.
To ensure pupil welfare is continuously monitored through attendance:

- Daily Registration & Unexplained Absences: Attendance is formally as detailed in the registration and supervision policy. Where a pupil is absent without prior notification or acceptable explanation, the College will initiate immediate same-day contact with parents/guardians to verify the child's location and safety.
- The DSL team routinely audits attendance logs against CPOMS data to identify patterns (e.g., specific days missed, frequent visits to the Health Centre during registration, or attendance drops following weekends/holidays).
- Thresholds for Safeguarding Escalation:
    - Unexplained absences exceeding 48 hours without valid parental contact will trigger a formal safeguarding welfare follow-up by the Housemaster/Housemistress (HM)

and/or the DSL team.
    - Persistent non-attendance or recurring erratic absence patterns will be logged on CPOMS as an Early Help indicator.
- Detailed operational procedures regarding registration timings, reporting absences, leave requests, and attendance tracking are set out in the registration and supervision policy

7.10 Educational Visits and Off-Site Activities: The College recognises that educational visits and off-site activities offer invaluable learning experiences. The safety, protection, and welfare of pupils remain our paramount concern during all off-site trips, residential visits, and overseas excursions.

- The DSL maintains overall strategic responsibility for safeguarding across all off-site activities. The DSL (or a designated DDSL) must be briefed on all residential/overseas trips and acts as the primary contact for the Trip Leader during any safeguarding incident.
- After participant lists are finalised, the Trip Leader must formally meet with the DSL/DDSL, the Head of the Health Centre, and the relevant Head of Year or Housemaster/Housemistress. This meeting ensures a comprehensive review of any pre-existing medical, pastoral, or safeguarding concerns before final risk assessment approval.
- All accompanying staff and volunteers must undergo safer recruitment checks (including ICPC or equivalent). Staffing ratios must comply strictly with College EV statutory standards based on pupil age and activity risk profile.
- On all residential trips, staff and pupils must have entirely separate sleeping and washing facilities. Pupil sleeping quarters are strictly segregated by gender. Pupils may only share rooms with peers within a one-year school gap; any exception requires an approved specific risk assessment. Pupils are strictly prohibited from sharing beds.
- Staff Code of Conduct & Boundaries on Trips:
    - The consumption or influence of alcohol by staff/volunteers is strictly prohibited for the entire duration of any trip.
    - Staff must not post images, videos, or trip details on personal social media accounts or connect with pupils on private platforms. Personal mobile phone use by staff must be restricted to free time when not directly supervising pupils.
- Any welfare concern during a trip must be reported immediately to the Trip Leader, who will consult the DSL. Any allegation against an accompanying staff member or volunteer must be reported directly to the Master in accordance with College allegations management procedures.
- Detailed procedures regarding EV risk assessments, emergency response protocols, supervision ratio tables, and medical administration are set out in the Educational visits policy

7.11 A forced marriage is a marriage conducted without the full and free consent of both parties and where duress is a factor. Duress can include physical, psychological, financial, sexual, and emotional abuse. Forced marriage is both a child protection and adult protection matter. Child protection processes will be considered up to the age of 18. Forced marriage may be a risk alongside other forms of so-called 'honour-based' abuse (HBA). We recognise that safeguarding against forced marriage is no different to safeguarding against any other vulnerability in today's society. We will ensure that our pupils are educated to ensure they understand what a healthy relationship looks like.

7.12 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. In the unfortunate event that a pupil is without a roof over their head for one or more days due to not being allowed in their home by their parents or guardians or any scenario where a pupil is left without a safe dwelling, the following steps will be taken:
i. Report the situation to the Designated Safeguarding Lead team or JKM. The DSL team will review each case on a case-by-case basis.

ii. Guidance will be sought from the police and external experts to understand the situation better.

We are committed to ensuring the safety and well-being of all our pupils, and we will work closely with relevant authorities and experts to address any homelessness issues promptly and effectively

7.13 The College recognises that mental health struggles, self-harm, and suicidal ideation are serious safeguarding concerns in their own right. While mental health difficulties are not inherently caused by abuse or neglect, a child's mental health can cross the threshold into a Medical Neglect concern when parents or carers fail to engage with or secure the required professional support.

Staff must be vigilant to situations where:

- Refusal or Denial of Treatment: Parents or carers consistently refuse, delay, or resist seeking medical, psychological, or psychiatric support for a child exhibiting severe mental health distress, self-harming behaviors, or suicidal ideation.
- Lack of Parental Understanding or Stigma: Parents minimise, dismiss, or blame the child for their mental health difficulties due to social stigma, fear of family reputational damage, or a refusal to acknowledge the severity of the issue.
- Failure to Follow Specialist Advice: Parents actively withdraw a child from prescribed therapy, fail to administer essential mental health medication, or cancel clinical appointments against professional medical advice.
- Barriers to Engagement: The family home environment actively exacerbates the child's mental health deterioration while parents block school-led pastoral interventions or external referrals.

Where parental failure or unwillingness to support a child's severe mental health needs places the child at risk of significant physical or emotional harm (including self-harm or suicide), the College will treat this as a safeguarding and medical neglect concern and escalate accordingly. This must be logged on CPOMS as a safeguarding concern.

7.14 Affluent Neglect.The College acknowledges that neglect is not limited to environments of financial hardship or poverty. Affluent Neglect occurs in wealthier families where a child's physical and material needs (e.g., housing, clothing, elite education) are met, but their basic emotional, supervisory, or developmental needs are significantly neglected.

In our setting, staff must be aware that affluent neglect often presents as:

- Emotional Invisibility and Isolation: Children who spend extended periods without meaningful parental contact, care, or emotional connection, often relying solely on paid staff, boarding arrangements, or living independently due to parents traveling extensively or working long hours.
- High Academic/Perfectionist Pressure: Extreme parental expectations placed on performance and reputation, leading to severe emotional distress, anxiety, or low self-worth, coupled with a lack of parental empathy or support.
- Lack of Boundaries and Supervisory Neglect: Parents exhibiting an overly relaxed attitude toward risky adolescent behaviours (such as substance use, alcohol, or unmonitored online activity) under the guise of independence or trust, leaving the young person vulnerable.
- Material Indulgence as a Substitute for Care: Using luxury goods, excessive allowances, or material privileges to replace parental presence, guidance, and emotional boundaries.
- Institutional and Parental Resistance: Wealthier parents may use professional status, legal threats, or formal influence to challenge safeguarding inquiries or hide underlying family dysfunction, making emotional neglect harder to identify and address.

Staff must look beyond a family's material wealth and immaculate presentation. If a child appears emotionally isolated, under unsustainable pressure, or lacks protective parental oversight, this must be logged on CPOMS as a potential safeguarding concern.

7.15 Restrictive Intervention and Physical Safeguarding: Marlborough College Malaysia is committed to maintaining a safe, positive, and non-threatening environment. The use of restrictive intervention, defined as measures that prevent, restrict, or subdue a pupil's movement (including restraint and seclusion), is very rare and is strictly used as an exceptional last resort.

- Restrictive interventions are only permitted when all non-restrictive de-escalation strategies (e.g., verbal de-escalation, environmental adjustments, distraction, "change of face", and calm reminders) have been exhausted or would be ineffective in preventing immediate harm.
- Restrictive intervention may only be applied by authorised teaching or supervisory non-teaching staff using the minimum force necessary to prevent a pupil from:
    - Committing a criminal offence;
    - Injuring themselves or others;
    - Causing serious damage to property;
    - Engaging in behavior highly prejudicial to maintaining good order and discipline (in or out of school);
    - Possessing prohibited items during an authorised search.
- Physical intervention must never involve actions that restrict breathing, twisting limbs, tripping, slapping/kicking, or indecent touch. Temporary placement in a designated safe room (such as the Health Centre) constitutes *seclusion* and must never be used as a disciplinary punishment, but solely for emergency self-harm/safety management under constant 1-on-1 staff supervision.
- For pupils with Special Educational Needs and Disabilities (SEND) or repeated challenging behaviours, proactive Behaviour Support Plans will be co-produced with parents, the Head of Learning Enrichment, and pastoral teams to map known triggers, effective de-escalation, and agreed proportionate interventions.
- Mandatory Reporting & Post-Incident Debrief:
    - Any use of physical restraint must be reported orally immediately to the Master/Second Master/DSL and followed by a written CPOMS report.
    - Parents must be informed on the same day.
    - Mandatory post-incident steps include a physical and emotional wellbeing check, a reflective debrief for both the staff member and pupil, and SMT/Council oversight of restraint data.
- For details refer to the restrictive intervention of pupils policy.

7.16 Boarding Welfare and Safeguarding: The College ensures that safeguarding in boarding accommodation adheres to the Boarding Schools: National Minimum Standards (NMS) and standard international best practices.

- :A qualified member of the residential team (HM, DHM, RHT or Dame) is on duty, contactable, and present within each Boarding House 24 hours a day during term time. Overnight staff absences require prior clearance from the Head of Pastoral Care with equivalent cover arranged.
- Staff private accommodation within boarding houses is strictly separate from pupil areas. Clear, physical, and professional boundaries are maintained at all times. Pupils are not permitted in private staff quarters unless accompanied by another adult for a clear, legitimate pastoral purpose.
- Staff monitoring in residential houses remains vigilant to risks unique to full-time communal living, such as peer-on-peer bullying, initiation/hazing practices, and unauthorised room visitations during night-time hours.
- For details see the boarding principles policy and the visitors to boarding houses policy

7.17 Every EYFS child is assigned a Key Person who monitors their emotional well-being, development, and daily welfare. Any emerging developmental delays, unexplained behavioral shifts, or physical indicators of neglect/harm are logged immediately on CPOMS and discussed with the Head of Pre-Prep/ DDSL

7.18 Children Questioning Their Gender Identity: The College adopts a cautious, welfare-centric safeguarding approach focused entirely on the child's best interests. Any request for a change in social transition (e.g., changing names, pronouns, or uniforms) will not be initiated by the College. It will instead trigger an individualised safeguarding risk assessment managed by the DSL team, with a requirement for parental involvement from the outset, except in rare instances where doing so poses an immediate risk of significant harm to the child. Single-sex facilities, including toilets, changing rooms, and boarding house dormitories, are strictly maintained based on biological sex as mandated by statutory requirements.

8. Racist Incidents

Our policy on racist incidents is set out in the Countering Bullying Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under safeguarding procedures.

9. Anti-Bullying

9.1 Our policy on countering-bullying is set out in a separate policy and we acknowledge that to allow or condone bullying may lead to consideration under safeguarding procedures. All incidences of bullying, including cyber-bullying, sharing nudes and semi-nudes, racist, homophobic and gender-related bullying, will be dealt with in accordance with our countering bullying policy. We recognise that children with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in College.

9.2 We recognise that there will be occasions when bullying incidents will fall within child protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to the Police.

10. Online-safety

10.1 All staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and exploitation online as well as face-to-face, this can also be classified as child-on child abuse. The College understands that in many cases abuse will take place concurrently via online channels and in daily life. The College knows that children can also abuse other children online. This can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography. Exploitation can include instances where a child may be groomed to become involved in sexual or criminal activity.

10.2 The DSL understands the unique risks associated with online safety and, working closely with the IT Manager who has the relevant knowledge and up to date capability required to keep children safe whilst they are online at College.

10.3 Technical Filtering, 24/7 Safeguarding Monitoring, and AI Oversight.

Marlborough College Malaysia maintains robust, multi-layered technical filtering and monitoring systems to ensure a secure digital environment across the entire pupil body, in full compliance with UK Keeping Children Safe in Education (KCSIE) standards and British Schools Overseas (BSO) benchmarks.

- 24/7/365 Continuous Safeguarding Monitoring:
    - System Operations: The College utilises Lightspeed software across all pupil-managed

devices. While content filtering (website blocking) operates actively on the school network, technical safeguarding monitoring remains active 24 hours a day, 7 days a week, 365 days a year, regardless of the device's location or network connection.
    - Community Ecosystem Rationale: To protect our 24/7 boarding community and eliminate security loopholes, a single, non-exempt safety standard applies to all day and boarding pupils alike.
    - Monitoring relies on real-time tracking, algorithmic safety triggers, and AI-driven keyword detection for severe vulnerabilities (e.g., self-harm, extreme violence, or coercion). Everyday typing, passwords, and private family communications are not logged. If a trigger is tripped, encrypted temporary snapshots are captured strictly for context, restricted to the DSL team, and subject to automatic, permanent purge retention schedules.
- Artificial Intelligence (AI) Prompt Reporting:
    - To promote academic integrity and monitor risk, the College utilises Lightspeed's AI Prompt Reporting feature to audit text prompts submitted to conversational AI tools (e.g., Gemini).
    - Access to AI prompt audit logs is strictly restricted to authorised staff, handles data securely without training external AI models, and evaluates content for safety triggers.
    - Out-of-Hours Escalation & Lightspeed Human Monitor:
    - During out-of-hours and non-term periods, critical alerts are monitored via the Lightspeed Human Monitor service. Imminent, life-threatening alerts trigger immediate emergency escalation directly to the Designated Safeguarding Lead (DSL) via phone.
- Off-Campus Accountability Boundary:
    - While automated monitoring provides a vital digital safety net off-campus, primary responsibility for physical supervision and home guidance rests with parents/guardians. The College is not legally liable for off-campus monitoring data generated outside standard operations.
- Installation of monitoring software is mandatory on all pupil devices. Any attempt to tamper with, disable, or remove the software agent triggers an immediate alert to IT/Pastoral teams and will result in disciplinary action under the Behavior Expectations and ICT Responsible Use Policies.

10.4 The DSL is able to recognise the additional risks that children with SEN and disabilities face online, for example from online bullying, grooming and radicalisation and has the capability to support SEND children to stay safe online.

10.5 All members of staff are trained in and receive regular updates in online-safety and recognising and reporting concerns. The College will ensure online safety is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the DSL and any parental engagement.

10.6 Our Policy on the Acceptable Use of ICT and Online Safety recognises that internet safety is a whole College responsibility (staff, pupils, governors, and parents).

10.7 Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal, such as up-skirting

10.8 We therefore recognise our responsibility to educate our pupils, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.

10.9 We will ensure that filters are in place to prevent access to unsuitable sites and we will monitor the use of the College network and internet to ensure that any pupil or staff member attempting to access inappropriate, abusive or harmful material is appropriately advised and/or supported.

10.10 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

i. content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism;

ii. contact: being subjected to harmful online interaction with other users; for example, child on child pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;

iii. conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and / or pornography), sharing other explicit images and online bullying;

iv. commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If pupils or staff are at risk, it should be reported to the DSL.

10.11 The College explicitly recognises that misinformation (false information shared without malicious intent), disinformation (false information shared deliberately to deceive), and conspiracy theories are a significant and growing safeguarding risk. This falls under the area of content risk (as per 10.9.i) but can also impact conduct and contact. Exposure to such content can:

- Lead to anxiety, paranoia, and a distorted perception of reality, negatively impacting a child's mental health and wellbeing.

- Erode trust in credible institutions, scientific consensus, and democratic frameworks, driving societal polarisation.

When a pupil is found to be viewing, creating, or sharing misinformation, disinformation, or content related to conspiracy theories, the College will utilise a tiered risk threshold to determine whether the response requires an educational intervention or a formal child protection pathway.

- Tier 1: Educational & Pastoral Intervention (Low Risk): The pupil is passively consuming or occasionally sharing mainstream misinformation out of curiosity or a lack of critical digital literacy. There is no evidence of targeted hostility, malice, or systemic behavior changes. *Action:* Managed at the tutor or HM level focusing on digital literacy. Logged on CPOMS as a pastoral note.
- Tier 2: Early Help & Targeted Support (Medium Risk): The pupil exhibits an escalating or obsessive fixation on fringe narratives, accompanied by signs of anxiety, paranoia, a distorted perception of reality, or early signs of social isolation from their regular peer group. *Action:* A formal concern is logged on CPOMS. The DSL team collaborates with the HM and College Counsellor to create an internal support plan , engaging parents where safe to do so.
- Tier 3: Child Protection & Radicalisation Escalation (High Risk): The concern shifts to a child protection issue when the pupil transitions from consuming content to actively producing or distributing hateful/extremist material ; uses narratives to harass or incite hostility against individuals/protected groups; or exhibits extreme ideological isolation with a severe "us vs. them" worldview. *Action:* Immediate escalation by the DSL team. The DSL will initiate a formal safeguarding risk assessment and make an immediate referral to external authorities, which could include the Royal Malaysia Police PDRM or the Department of Social Welfare (JKM).

10.12. AI, Deepfakes and Safeguarding Images: The College recognises that child-on-child online abuse includes self-generated intimate images/videos as well as those generated or manipulated using Artificial Intelligence (e.g., deepfakes). The production or sharing of such material will be treated as an immediate high-level safeguarding issue.

10.13. Cyber Security Data Safeguarding: In line with KCSIE 202G, the compromise of sensitive pupil data via a cyber-attack is recognized as a direct risk to child welfare. In the event of a significant data breach involving safeguarding records, the DSL and IT Operations Manager will initiate a joint safeguarding risk assessment alongside local PDPA protocols.

10.14 Mobile Phone and Personal Device Protocol:In alignment with statutory guidance and to protect pupils from digital distraction, unmonitored online exposure, peer-on-peer online harassment, and unauthorised image recording during the school day, the College operates as a mobile phone-free environment by default.

- Daily Collection & Year-Group Expectations:
    - Prep Day Pupils: Mobile phones and personal smart devices must be handed in at Prep reception at the start of the College day and are returned only at the conclusion of daily scheduled activities.
    - Senior Day pupils: Mobile phones and personal smart devices must be handed in and surrendered to designated secure house storage at the start of the College day and are returned only at the conclusion of daily scheduled activities.
    - Boarders Daily Storage: Boarders must surrender their mobile phones to the House Team, where they will be stored securely in the Boarding House for the duration of the school day. Phones will be formally checked in and checked out by the House Team at the start and end of the College day. All boarders' mobile phones will be collected by the House Team overnight to promote healthy sleep hygiene and protect pupils from unmonitored night-time digital exposure. Specific timings for daily collection and return are detailed in the Boarding House handbooks.
- Failure to hand in a mobile device when required, or the possession or use of a second "dummy" phone to circumvent this policy, constitutes a breach of College rules and will trigger disciplinary action.
- Image Capture & Consent: Taking, possessing, or sharing photographs, videos, or media of any individual without explicit consent is strictly prohibited. The creation, possession, or distribution of deepfakes, manipulated imagery, or AI-generated intimate/explicit content is managed instantly as a severe safeguarding breach and statutory abuse.
- Confiscation, Examination, & DSL Escalation:
    - If there are reasonable grounds to suspect inappropriate communications or a safeguarding breach, pupils will be required to surrender devices for examination in the presence of the pupil.
    - Staff must never attempt to search or download content from a pupil's device independently.. Any device confiscated due to a suspected safeguarding concern (e.g., image-based abuse, severe peer coercion, or illicit content) must be surrendered directly to the Master, Head of School, or DSL/DDSL for handling under formal evidence protocols.
- For detailed rules on device monitoring, network inspection, AI usage, and sanctions, refer to Searching a pupil policy, Responsible user policy and Online Safety policy.
- In EYFS settings (Nursery and Reception), staff, volunteers, and visitors are strictly prohibited from using personal mobile phones, smartwatches, or cameras in rooms where EYFS children are present or during outdoor early years activities.

To counter these risks, the College is committed to a proactive educational approach through our Wellbeing curriculum and will explicitly teach pupils skills in digital and media literacy. When a pupil is found to be viewing, creating, or sharing misinformation, disinformation, or content related to conspiracy

theories, the College will respond in a supportive and educational manner. Any such concerns must be reported to the DSL, who will assess the risk of harm to the individual pupil and the wider College community.

11. Supporting Children

11.1 We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame.

11.2 We acknowledge that the College may be the only stable, secure and predictable element in the lives of children who have been abused, neglected or who are at risk of harm or exploitation.

11.3 We are aware that research shows that at College their behaviour may be challenging and defiant or they may be withdrawn. The College will endeavour to support all children by:

i. Encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, and challenging bullying and humiliating behaviour;
ii. Promoting a positive, supportive and secure environment, giving pupils a sense of being valued;
iii. Enforcing a consistently applied College behaviour expectations policy which is aimed at supporting positive behaviour and vulnerable pupils. The College will ensure that the pupil knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse, neglect or exploitation which has occurred;
iv. Providing continuing support to a child about whom there have been concerns who leaves the College by ensuring that appropriate information is forwarded under confidential cover to the child's new setting.

11.4 Children Who Cause Harm: We explicitly recognise that children who perpetrate harm, abuse, or exploitation against others are also children who require pastoral support and a safeguarding response.

- The College will ensure that any harmful or abusive behaviour by a pupil is explored through a safeguarding lens. We recognise that children who display harmful behaviours have often experienced trauma, abuse, or neglect themselves.
- Viewing a child's actions through a safeguarding lens does not mean excusing, lowering expectations, or minimising the serious impact of their behaviour on the victims. The College remains fully committed to protecting and supporting those affected by the harm.
- We maintain a dual responsibility: ensuring robust accountability and safety for the wider College community, while concurrently identifying and addressing the underlying vulnerabilities, trauma, or unmet needs of the child causing harm.
- Where it is determined that a child's complex needs or risks mean that continued support cannot safely or appropriately happen within the College, we will work proactively with external agencies (such as health professionals) to ensure a managed transition to a setting where they can receive the specialist support required.

12. Information Sharing & Confidentiality

We recognise that all matters relating to child protection are sensitive. Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation.

12.1 All personal information will be processed fairly and lawfully in line with our duties under the Data Protection Legislation, including PDPA and GDPR, and will be held safely and securely. However,

we recognise that this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm.

12.2 The Master or DSL will disclose any information about a pupil to other members of staff on a need to know basis only.

12.3.1 All staff must recognise that while they have a professional responsibility to ensure information is shared with external agencies (such as the Social Welfare Department / *Jabatan Kebajikan Masyarakat* (JKM), the Royal Malaysia Police, or medical professionals) to safeguard a child, this must never be done independently.

12.3.2 Strict Internal Referral Route:

- Staff members must never contact, report to, or share details with an external agency regarding a safeguarding concern on their own initiative.
- Any and all safeguarding concerns, disclosures, or suspicions must be reported via CPOMS to the DSL or DDSL.
- The decision to formally share information or file a statutory report with Malaysian authorities rests solely with the DSL/DDSL and SMT, ensuring that the school acts as a single, coordinated entity.

12.3.3 Statutory Requests for Information:

- Where an external agency (such as JKM or the Police) actively requests information or pupil records from a staff member regarding a safeguarding or welfare issue, the staff member can and should cooperate, but they must immediately direct the request to, and seek explicit guidance from, the DSL/DDSL or SMT before releasing any data or verbal statements.
- The College will ensure that information shared with external bodies is necessary, proportionate, securely transmitted under confidential cover, and aligned with local legal frameworks (including the *Child Act 2001* and the *Sexual Offences Against Children Act 2017*).

12.4 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being, or that of others.

12.5 When a child about whom concerns have been raised and recorded leaves the College, the DSL will consider if it would be appropriate to share information with the new school/college in advance of the child leaving to ensure that support is in place for when the child arrives

13 Communication with Parents

13.1 We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively.

13.2 We will always undertake appropriate discussion with parents prior to involvement of another agency unless to do so could place the child or an adult at further risk of harm or would impede a criminal investigation.

13.3 We will ensure that parents have an understanding of the responsibilities placed on the College and staff to safeguard children and their duty to cooperate with other agencies in this respect.

14. Record Keeping

14.1 CPOMS is the electronic recording system used by the College to record all safeguarding and child protection information. All staff have access to the system and should contact the DSL for assistance. There are varying access rights to the system to ensure that sensitive information is only shared with those who require it. The recording should also include the rationale for decisions even if that decision was to wait and monitor the situation.

14.2 If staff are concerned about the welfare or safety of any pupil they will record this on CPOMS or pass it to the DSL without delay, or by the end of the school day.

14.3 Concerns are summarised and categorised to gather useful themes and trends. These categories provide clear and comprehensive summaries of all the concerns along with details of how each was followed up, any action taken, the decisions reached and the subsequent outcome.

14.4 Any member of staff receiving a disclosure of abuse, neglect or exploitation from a child or young person, or noticing signs or symptoms of possible abuse, neglect or exploitation will make notes as soon as possible writing down exactly what was said, using the child's own words as far as possible and record on CPOMS by the end of the day. Any statements should be timed, dated and signed, with name printed alongside the signature.

14.5 All records of a child protection nature will be passed to the DSL including case conference minutes and written records of any concerns. Child protection records are kept securely in CPOMS, with only appropriate persons having access to them. Access is automatically removed if the individual or a direct member of their family is directly involved in the report in any way.

14.G Any referrals made to other agencies will be copied prior to sending and stored in CPOMS.

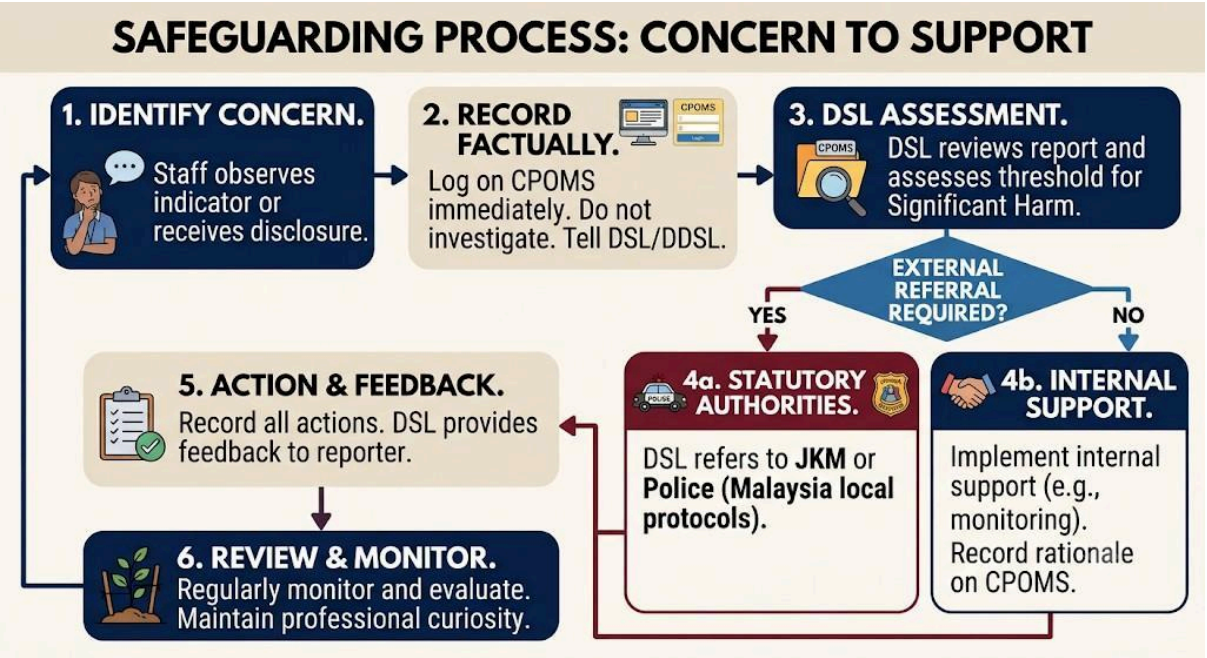
14.7 The DSL will maintain and regularly audit the College's child protection records and ensure that each stand-alone Child Protection file includes a chronology of significant events, and that information and contact details are accurate and up to date.

14.8 The DSL will transfer the child protection record in a safe and timely manner when a child moves College, ensuring receipt of transfer is obtained. Additionally, the DSL will engage in a direct verbal consultation with the destination school's DSL to transfer critical context regarding high-level risks (such as AI harms, radicalisation, or serious violence).

14.9 The DSL may copy child protection records generated by the College prior to transfer and retain for as long as is necessary (normally d.o.b. + 25 years), where there is justification for believing that the records may be required as evidence of the College's involvement with the child for statutory purposes (e.g. court cases or serious case reviews). When the records are no longer required, they will be securely disposed of.

15. Additional Online Tuition, Appointments and Meetings

15.1 Where pupils, parents or guardians have made private arrangements for additional online tuition, appointments and meetings, the College cannot guarantee the safety of pupils. The College cannot carry out recruitment checks on people who are not employees, and the College cannot supervise privately arranged online sessions. Parents must ensure they are satisfied that their children are adequately safeguarded during online tuition, appointments and meetings and should inform the Housemistress or Housemaster (HM) with the details of with whom and when the sessions are taking place.



16. Supporting and Supervision of Staff

16.1 We recognise that staff working in the College who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

16.2 We will support such staff by providing an opportunity to talk through their anxieties with the DSL or with the College Counsellor.

16.3 We will also support such staff by providing structured, regular supervision, as appropriate.

17. Safer Recruitment of Staff

17.1 The College has a written Safer Recruitment Policy statement and procedures linking explicitly to this policy. The statement is included in all job advertisements, recruitment websites, and candidate information packs.

17.2 The recruitment process is robust in seeking to establish the commitment of candidates to support the College's measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them. References are requested, scrutinised and discrepancies followed up.

17.3 All staff working within our College who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications and a satisfactory barred list check, enhanced ICPC check or equivalent. They have also undertaken Safeguarding training so they know who the DSL's are and also what to do and who to tell in all situations.

17.4 All teachers working within our College have been checked to ensure that they have completed their teacher induction, are suitably qualified and that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions (e.g. in management posts).

17.5 Our governors (Council) are subject to an enhanced ICPC check or equivalent.

17.6 Any member of staff taking up a management position will be checked to ensure s/he is not subject to a section 128 direction made by the Secretary of State (or equivalent check if they are a non-UK national).

17.7 The College maintains a single central register of recruitment checks.

17.8 Any member of staff working in regulated activity prior to receipt of a satisfactory ICPC check will not be left unsupervised and will be subject to a risk assessment.

17.9 Volunteers who are not working in regulated activity, will be supervised at all times. A risk assessment will be undertaken, if appropriate, to help decide whether or not an enhanced ICPC check or equivalent is required.

17.10 The College seeks written assurance from supply and third-party agencies, alternative providers, initial teacher training providers and contractors that they have undertaken all appropriate checks on any of their staff that work with or have regular contact with our pupils.

18. Allegations against staff

The College 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 College will take action in accordance with Part 4 of Keeping Children Safe in Education 202G and the College's employment procedures.

18.1 We acknowledge that a pupil may make an allegation against a member of staff or volunteer.

18.2 If such an allegation is made, which meets the criteria as identified in Part 4 of Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the Master via email, unless the allegation concerns the Master, in which case the Chairman of Pastoral Committee will be informed immediately via email by council@marlboroughcollege.my or via the Second Master or Busar.

18.3 The Master (or Chairman of the Pastoral Committee) on all such occasions will discuss the content of the allegation with the DSL and Safeguarding Consultant, prior to undertaking any investigation.

18.4 If it is not possible to report to the Master or Chairman of the Pastoral Committee in the circumstances set out above, a report should be made immediately to the Designated Safeguarding Lead via email. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the Master or, where appropriate, the Chairman of the Pastoral Committee or nominated member of the College Council.

18.5 Key people will be informed of the allegation as soon as is appropriate, including the child's parents and line manager.

18.6 Malicious Allegations:

i. Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Master will consider whether to take disciplinary action in accordance with the College's Behaviour Expectations Policy.
ii. Where a pupil or parent has made a deliberately invented or malicious allegation the Master will consider whether to require that parent to withdraw their child or children from the College on the basis that they have treated the College or a member of staff unreasonably.
iii. Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the College reserves the right to contact the police to determine whether any action might be appropriate.

19. Low Level Concerns and Whistleblowing

A Low-Level Concern is any concern, no matter how small, and even if it causes only a sense of unease or a "nagging doubt", that a member of staff, volunteer, or contractor may have acted in a way that is inconsistent with the College's Code of Conduct or Safeguarding Policy. A low-level concern does not meet the harm threshold for an allegation (it does not suggest that a staff member has harmed a child, committed an offence, or posed an immediate risk). However, addressing low-level concerns early helps maintain an open, transparent culture and prevents minor issues from escalating.

A low-level concern about any member of staff should be reported directly to the Master. You may choose whichever method feels most comfortable for you:

- Send a direct email to the Master detailing your concern.
- Request an appointment with the Master via his EA to discuss the matter confidentially.

If you have a concern regarding the Master, do not report it directly to them. Instead, you may choose one of the following confidential reporting routes depending on what makes you feel most comfortable:

- Email the Chair of the Pastoral Committee directly council@marlboroughcollege.my
- Email the Second Master or the Bursar, who will ensure the matter is reported directly to the Chair of the Pastoral Committee on your behalf.

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the College's Whistleblowing policy.

Whistleblowing concerns about the Master should be raised with the Chairman of the Pastoral Committee. Low-Level Concerns and Whistleblowing mechanisms both support professional standards; they serve distinct purposes. A Low-Level Concern focuses on minor behaviours, boundary blurs, or minor breaches of the Code of Conduct that do not reach the harm threshold. Its primary goal is early intervention, supporting staff, correcting minor behaviour, and maintaining safe boundaries, operating on a low threshold whenever a colleague experiences a sense of unease. In contrast, Whistleblowing addresses systemic wrongdoing, illegal acts, major safety risks, financial malpractice, or serious harm threshold breaches. It carries a higher threshold, dealing with criminal acts, health and safety dangers, or legal non-compliance, with the goal of exposing serious organisational wrongdoing.

20. Complaints or Concerns expressed by Pupils, Parents, Staff or Volunteers

20.1 We recognise that listening to children is an important and essential part of safeguarding them against abuse, neglect and exploitation. To this end, any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.

20.2 We will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the College will take but also the length of time that will be required to resolve the complaint. The College will also endeavour to keep the child or adult regularly informed as to the progress of his/her complaint. The College's complaints procedures are readily available.

21. Staff/pupil relationships

21.1 The College provides advice to staff regarding their personal online activity and has strict rules

regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or safeguarding investigation. Staff are expected to maintain professional relationships with pupils at all times as outlined in the in the Staff Code of Conduct

22.Visitors and Guests

22.1 All visitors and residential guests to the College are required to sign in and complete the Visitors Safeguarding and Code of Conduct google form. This is done through a QR code at the security guard house, but additional QR codes are in place at each of the reception desks in Pre-Prep, Prep and Senior School. In addition, visitors are also given the visitor's protocol leaflet.

22.2 In line with safeguarding best practice and to ensure the safety and wellbeing of all pupils and staff, any overnight guests or visitors staying in residential accommodation or boarding houses on campus must receive prior permission from the Master. The Master will be responsible for recording the request, conducting an appropriate risk assessment, and informing relevant staff as necessary. No overnight stays should occur without this formal approval process being followed.

23 . Health & Safety

23.1 Our Health & Safety Policy, set out in a separate document, reflects the consideration we give to the safeguarding of our children both within the College environment and when away from the College, for example when undertaking College trips and visits.

23.2 Risk Assessments are undertaken and reviewed regularly in respect of:

- Site security and physical access control;
- The risk of children being drawn into terrorism or exposed to extremist behaviour (in alignment with local and international preventing-extremism expectations);
- The risks to and from children displaying harmful behaviour (including harmful child-on-child behaviour).
- Individualised risk assessments and safety management plans will be drawn up for any pupil identified as experiencing, or at risk of, self-harm or suicidal ideation.
- These risk assessments are formulated collaboratively by the DSL and DDSL, in direct conjunction with the wider Pastoral Team (including HMs, counsellors, and medical staff) and informed by professional medical or psychological advice (e.g., external clinical mental health practitioners/ psychiatrists).
- These assessments are dynamic documents that are regularly reviewed and updated to reflect changing risk levels, treatment plans, and necessary adjustments to the pupil's daily school environment.

24 Safe Environment

24.1 The College undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety. The DSL is a member of the College's Health and Safety committee who meet at least termly to review all aspects of health and safety across the College.

24.2 The College has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of College hours.

24.3 The College keeps record of visitors and vehicles entering and leaving the grounds. With the exception of parents and prospective parents, visitors will also be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the College premises.

24.4 Visitors to the College, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material.

24.5 All visitors to boarding houses must observe the necessity to be kept under sufficient staff supervision during their visit.

25 Our Safeguarding Children policy and procedures will be monitored and evaluated by:

i. Completion and return to the annual safeguarding report to the Council;
ii. College Safeguarding Consultant, MCUK DSL along with Encompass Safeguarding who provide professional supervision on complex cases.
iii. Pupil surveys and questionnaires;
iv. Discussions with children and staff;
v. Scrutiny of data and risk assessments;
vi. Scrutiny of the College's single central record of recruitment checks;
vii. Scrutiny of College Council minutes;
viii. Monitoring of records of bullying/racist/behaviour incidents;
ix. Supervision of staff involved in child protection;

The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the College Council as necessary. Any child protection incidents at the College will be followed by a review of these procedures by the DSL and Master and a report to the College Council. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

In addition, the College Council will ensure that the DSL will undertake an annual review of this policy. The outcome of the annual review by the DSL will be reported to the College Council who will review the policy and the implementation of its procedures and consider the proposed amendments to the policy, from both the DSL and its own members, before giving the revised policy its final approval.

Minutes recording the review by the College Council will be made. This policy is updated annually.

Document Management	
Policy Reference:	Safeguarding and Child Protection Policy
Status	Published
Author: Justine Tomlinson	**Reviewed by:** Rachel Eaton-Jones

Job Title: Head of Pastoral Care	**Approved by:** Second Master
Review Date: August 2026	**Next Review Date:** August 2027
Circulation: MCM Website	

Safeguarding for Pupils (to be replaced by posters)

Marlborough College is committed to safeguarding and promoting the welfare of pupils and expects all staff, volunteers and visitors to share in this commitment. The College actively listens to all pupils and always takes seriously what they tell us. Our aim is for all pupils to enjoy their time at the College and feel safe and secure.

Introduction

Protecting the safety and welfare of pupils is important to us and the College works hard to make you feel safe, valued and respected. The College expects everyone who works at the College to help us achieve this and to follow our safeguarding policy. Safeguarding is the work the College does to look after your welfare and keep you safe from harm.

This guide explains:

- What the College does to keep pupils safe from harm and being mistreated.
- What the College expects from people who work at the College and what you can expect from them.
- What abuse, bullying and safeguarding concerns mean.
- What you should do if you are feeling worried or unsafe, or if you are worried about someone else.

Your Rights:

- You have a right to be kept safe on and offline.

- You have the right to healthy relationships and appropriate boundaries.
- You have the right not to be bullied, harassed or intimidated.
- You have the right to feel safe.
- You have the right not to be discriminated against.
- You have the right to be taught to protect yourself and how to stay safe.
- You have the right to be told how to get help if you need it.

How do we keep you safe?

- Safeguarding is everyone's responsibility at Marlborough College and the College has a Safeguarding and Pastoral Team to support and advise you.
- The College makes sure people who work for us understand our safeguarding policy and their responsibilities.
- The College empowers everyone to protect themselves and others.
- The College creates a safe environment to ensure that you have an enjoyable experience.
- The College makes sure that the College only works with people and organisations who also believe in keeping children and young people safe.
- The College takes action when the College finds out that anyone has been abused, bullied or mistreated.

The people who work for us must never:

- Threaten, frighten, embarrass, humiliate, mistreat or bribe anyone.
- Develop inappropriate personal relationships with pupils.
- Invite you to their home, or the home of someone else they know without the permission of your HM.
- Send you personal emails or text messages, make personal calls to you or chat to you online using personal accounts. All communication must be professional and within professional boundaries.
- Have 'favourite' pupils. It is unfair to others when the same person is always chosen for special things. Everyone must be treated equally all the time.
- Give you personal gifts. Staff can give rewards for things like good behaviour or great achievements but this can only happen with others around and the reasons for the reward must be clearly explained to everyone.
- Help you with doing things like washing, showering, dressing or looking after your body. Everyone needs respect and private space to do these things.
- Touch your body inappropriately. There are times when touch is ok, like to help you if you have had an accident or injury, or to show you how to do something safely. You should never feel uncomfortable.
- Take or share photos or videos of you without you and your parents' or guardian's permission.

What does abuse and bullying mean?

It is important for you to understand what abuse and bullying are so that you know if it is happening to you or someone else. It is also important to tell someone if abuse, bullying or any other safeguarding concerns explained in this section are happening to you or someone else.

Physical abuse is when someone hurts or injures you or another person on purpose.

Sexual abuse is when someone is forced, pressurised or tricked into taking part in any kind of sexual activity with another person. This can happen in person or online.

Emotional abuse is when someone always puts you down, shouts at you, ignores you, says or does things that make you feel bad about yourself, tries to control you or put pressure on you to do things

you're not ready to do, stops you from having friends or when someone is aggressive and violent to other people in your family and you keep seeing it.

Neglect is when you don't get the help and care you need from someone who is supposed to be looking after you and keep you safe, for example, not getting important things you need at home like love, care and attention, warm clothes, enough to eat and drink, or medicine when you are ill.

Bullying is repeated negative behaviour that is intended to make someone feel upset, uncomfortable or unsafe.

Discrimination is when someone treats you differently or unfairly because you are different to them. You should be treated in the same way as everyone else - no matter who you are, where you come from, who you love or what you believe in.

Grooming is when someone builds a relationship with another person, and sometimes their family, to gain their trust to take advantage of them or abuse them. Grooming can happen online and in person.

Radicalisation is when someone starts to believe or support extreme views. Anybody, from any background can become radicalised. The concern is when somebody with an extreme view acts or intends to act upon their views in a way that is harmful to themselves or others.

Gangs can be a group of mates who hang around together. Hanging out with your friends can be a good way to get to know each other and share hobbies and interests. But it can become dangerous if you join a gang that does illegal things. Sometimes gangs are violent and might fight other gangs, carry weapons, carry or sell drugs.

Peer-on-Peer or Child-on-Child abuse can include bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers; physical abuse; sexual violence, such as rape, assault by penetration and sexual assault; sexual harassment; non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent; up-skirting; and initiation/hazing type violence and rituals.

Asking for help
If you have a problem, or are worried about something, it is always best to speak to an adult you trust. It can be difficult to find the right words so here are some tips to help make it a bit easier.

Start Somewhere
You do not have to share everything all at once. Say what comes to mind, it is okay if it does not come out perfectly. Telling someone is the most important thing. Speak with an adult you trust, someone that makes you feel safe and listened to. Some children and young people find it easier to write it down and share it with a trusted adult.

The adult may need to ask you questions about what you have written down but remember this is because they want to make sure they understand clearly, and it is not because they do not believe you. When you tell someone, they may need to tell other people to help keep you safe, but they should tell you who they are going to tell and why.

Who can I talk to?

You can talk to any member of staff including your House Team, College Counsellor or a member of the Pastoral Team. You can contact Head of Pastoral, Head of Pre-Prep or the Deputy Head. Your information is only shared with people who need to know to keep you safe. Anything you tell us will be stored securely.

Safeguarding for Pupils Nursery to Year 3

It is our job to keep you safe.

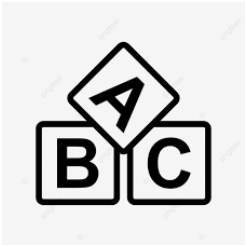
Your Rights

Feeling Safe	Healthy Relationships	Treated Kindly
Treated Fairly	Taught How to Keep Safe	Know How to Get Help

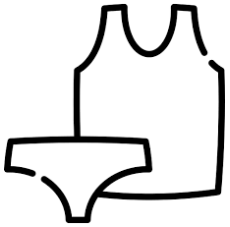
Your Responsibilities

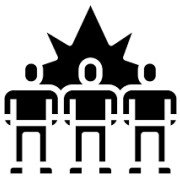
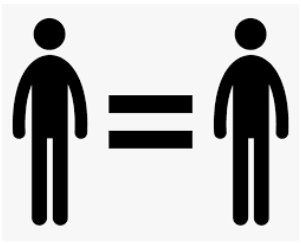
= Everyone!

Why do we need to be safe?

		
So we can learn	So we can happy	So we can grow

What things make us unsafe?

	Being hurt physically
	Unkind words
	Being touched on private parts of our bodies

	Being alone or uncared for
	Bullying
	Not being treated the same as others
	Uninvited contact from someone we don't know
	Keeping secrets that make us uncomfortable

How can you get help if you need it?

Remember to speak to an adult that you need to trust. This could be :

- ★ A parent or guardian
- ★ A carer
- ★ Any of your teachers
- ★ Any of the Teaching Partners
- ★ Head of Pre-Prep

Even if you are not sure, if you feel worried or scared you *must* speak to an adult. They can help you!

Document Management	
Policy Reference:	Safeguarding and Child Protection Policy
Status	Published
Author: Justine Tomlinson	**Reviewed by:** Rachel Eaton-Jones
Job Title: Head of Pastoral Care	**Approved by:** Second Master
Review Date: August 2026	**Next Review Date:** August 2027
Circulation: MCM Website	