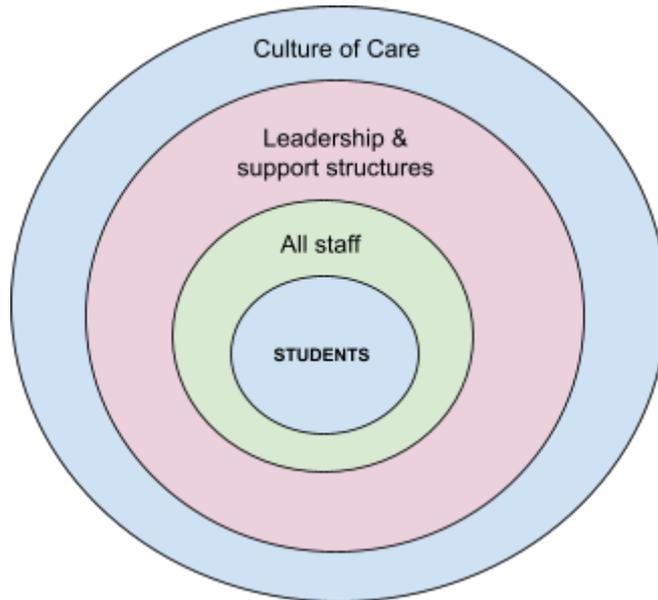


# Safeguarding Policy & Procedures.

<b>Introduction</b>	<b>1</b>
<b>Policy Review</b>	<b>2</b>
<b>Organization</b>	<b>3</b>
Child Protection Team	3
<b>Safeguarding</b>	<b>3</b>
Investigation Committee	3
Duty of Care	4
Power, Trust and Authority	4
Child Protection Code of Conduct	4
<b>Behavioural Expectations</b>	<b>4</b>
<b>Peer on Peer Abuse</b>	<b>7</b>
<b>Online Interactions</b>	<b>7</b>
<b>Images, Videos, and Other Media</b>	<b>8</b>
<b>Generative AI</b>	<b>9</b>
<b>Activities off Campus</b>	<b>9</b>
<b>PE Activities, Equipment and Facilities</b>	<b>10</b>
<b>Confidential Data</b>	<b>10</b>
Family Dynamics	11
<b>Campus Security</b>	<b>11</b>
<b>Recruitment</b>	<b>11</b>
<b>Facilities</b>	<b>12</b>
Staff Training	12
<b>Student, Parent and Visitor Training</b>	<b>13</b>

## Introduction

At CIS the safety of students is our primary consideration and as a school. We are committed to being a safe school. To do this we have an overarching culture of care that champions the welfare of every student and expects all staff, parents, students, volunteers, contractors and visitors to share in this commitment.



This Safeguarding Policy and Procedures is an overarching policy that sets the direction for safeguarding at CIS and articulates what and how of being a safe school. More detailed policies and procedures are articulated in following associated documents

- [Acceptable Network Use Policy \(ANUP\)](#)
- [AI Policy and Procedure](#)
- [Child Protection Policy](#)
- [Child Protection Code of Conduct for Staff and Volunteers](#)
- [CIS Swimming Pool Safety Policy and Procedures](#) (in development)
- [Electronic Device Policy](#)
- [Intimate Care Policy](#)
- [Managing Student Records Protocol](#)
- [Missing Child Protocol](#)
- [Physical Restraint Policy](#)
- [Personal Data Protection \(PDPA\) Policy](#)
- [Peer Safeguarding](#)
- [Risk assessment for PHE classes](#)
- [Social Media Policy](#)
- [Student Code of Conduct](#)
- [Standard Operating Procedures for Off Campus Trips](#)
- [Transgender and Gender Nonconforming Guidelines](#)

## Policy Review

The Safeguarding Policy is intended to be a living document. The Chief Safeguarding Officer will provide oversight of its review and ensure that it is implemented with fidelity. To ensure coherence and consistency related policies and procedures will also be aligned. The Academic Board will review and approve any changes. Relevant parts of the revised policy will be shared with parents, staff and students.

## Organization

Two designated groups directly support the execution of the Safeguarding Policy, the Safeguarding Committee and the Child Protection Team.

### Child Protection Team

Child protection refers to how the school responds to allegations of harm. In the case of an allegation of harm, CIS follows the guidelines outlined in Singapore's Ministry of Social and Family Development Sector Specific Screening Guide (SSSG) and Child Abuse Reporting Guide (CARG). CIS will not act alone, and will consult with and/or report to local external agencies as appropriate.

The child protection team includes

- Chief Child Protection Officer (Head of School)
- Senior Child Protection Officer (Head of Inclusion)
- Divisional Senior Child Protection Officers (Divisional Principals)
- Child Protection Officers (Divisional Vice Principals)
- Counsellors
- Head Nurse

The roles & responsibilities of the child protection team can be found in the *Child Protection Policy*.

### Safeguarding

Safeguarding refers to what we do to protect students from harm by mitigating risk. The CIS safeguarding policies, procedures, and practices reduce the risk of students being harmed. While they can't eliminate all risk factors, we believe that the following measures will significantly mitigate them.

The Safeguarding team is responsible for making sure that procedures are in place to protect individuals from harm and from harming others. To do this, they ensure that

- There is a comprehensive Safeguarding Program in place and associated policies and procedures are reviewed and updated regularly.
- Child protection training is mandatory for operational and academic staff and ECA providers so they know how to respond to harmful situations.
- Parent and student education programs support the understanding of the objectives and goals of safeguarding and child protection.

School wide safeguarding is overseen by the Head of School, Director of Operations, Head of HR , Head of Inclusion (Student Support and Well-being), Principal's and Vice-Principals.

### Investigation Committee

Academic and Operational staff who do not comply with the schools safeguarding and child protection guidelines will be referred to the investigation committee who will handle all misconduct allegations and disciplinary actions involving staff. The investigation committee consists of the Head of HR, Chief Child Protection Officer and the Senior Child Protection Officer.

### Duty of Care

All adults have a duty of care to keep children safe and treat them with respect and dignity. They are

expected to follow the procedures and steps outlined in this policy and the associated policy and guidance documents to ensure the safety and well-being of students. Failure to do so may be regarded as professional misconduct.

Staff need to be aware of the potential impact of not following the guidelines outlined in the *Child Protection Code of Conduct for Staff and Volunteers*. Staff who do not comply with these guidelines will be referred to the investigation committee.

## **Power, Trust and Authority**

Adults at CIS acknowledge that their position and/or authority puts them in a position of trust in relation to all students and a relationship in which the adult has a position of power or influence. The relationship with students is not one between equals. The potential for exploitation and harm, especially those students considered vulnerable, means that adults have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

## **Child Protection Code of Conduct**

Every staff member agrees to the expectations detailed in the *Child Protection Code of Conduct for Staff and Volunteers* upon acceptance of their employment and signing of their initial contract. The code of conduct cannot provide a complete checklist of what is or is not appropriate behavior, however, it is an expectation that interactions between adults and students are always appropriate. There may be occasions and circumstances where an adult has to make decisions or take action in the best interest of a child where no guidance exists. In order to be seen to be acting reasonably and to avoid false allegations, adults are expected to make judgments about their behavior in order to secure the best interests and welfare of the children in their care. These judgments should always be shared with the Principal or appropriate direct supervisor.

If significant amendments are made to the *Child Protection Code of Conduct for Staff and Volunteers* as part of its yearly review, staff may be required to re-sign so they are aware of the updates.

## **Behavioural Expectations**

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children by adopting high standards of professional conduct at CIS, outside of CIS, and online.

## **Discriminatory Behaviours & Microaggressions**

No staff or student may be discriminated against, favored, harassed or ostracized as a result of their identity or experience microaggressions.

A microaggression refers to a brief and commonplace verbal exchange or behaviour that targets the identity of an individual or group in a way that makes them feel uncomfortable, disrespected, invalidated, angry, or upset. Whether intentional or as a result of an unconscious bias, all staff have a duty of care to report to their Principal or Vice-Principal any situations where they personally experience microaggressions or notice it happening to others.

In promoting a culture of care the school is committed to expanding the CIS community's knowledge of discrimination and microaggressions to understand their impact on an individual's dignity and self-worth and how to appropriately respond to them.

### **Bullying**

Bullying is unwanted, aggressive behaviour with an intent to harm that involves a power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Bullying may include actions such as making threats, spreading rumours, attacking someone physically or verbally in person or online and excluding someone from a group on purpose. Because bullying involves a difference in power, staff, students, and parents must pay special attention to interactions that could be construed as bullying. All validated cases of such behavior will lead to disciplinary action. All staff are called on to participate actively in measures to hinder and prevent bullying.

Bullying is considered a major offence in the Student Code of Conduct with disciplinary actions outlined in the Code.

### **Sexual Harassment**

Sexual harassment can take the form of words, gestures, and actions. Examples include:

- insinuating and suggestive remarks about the appearance of a person;
- sexist comments and jokes about sexual characteristics, sexual behavior, sexual orientation;
- showing or displaying pornographic material;
- issuing unwanted invitations with unmistakable intent;
- unwanted bodily contact;
- stalking in or outside the school (including online);
- attempting to get close in a way that involves promises of advantage or threat of disadvantage; sexual assault, coercion or rape.

### **Sexual Conduct**

Any sexual behavior by a staff member with or towards a student is strictly prohibited. Sexual activity with a student will result in criminal procedures.

Sexual activity can involve physical contact, including penetrative and non-penetrative acts, however, it can also include non-contact activities, such as causing students to engage in online discussions of a sexual nature, watching sexual activity or the production of pornographic material;

There are occasions when adults embark on a course of behavior known as 'grooming' where the purpose is to gain the trust of a child, and manipulate the relationship so sexual activity can take place.

### **Physical Contact**

The school's expectation is that staff members build a positive and professional relationship with students and use their professional judgement about appropriate physical contact with children, as outlined in the Staff Code of Conduct.

The following guidelines should be followed when making a judgement about having physical contact with a child.

- Physical contact should be avoided, unless it is necessary to keep the student and others

safe;

- Physical contact should take place in a safe and open environment where one is easily observed by others and last for the minimum time necessary;
- Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority;
- If a staff member believes that action by them or a colleague could be misinterpreted, or if a physical action is observed which is possibly abusive, the incident and circumstances should be immediately reported to their direct supervisor.
- When a student initiates a hug, it's ok to gently reciprocate.
- When a child is upset/distraught, it's ok to comfort the child with a gentle hug.

The Intimate Care Policy outlines occasions when it is appropriate and proper for staff to have physical contact with children who need help with intimate care. However, it is crucial that they only do so in ways appropriate to their professional role and in relation to the student's individual needs.

### **Physical intervention/restraint**

Physical restraint is defined as the positive application of force in order to protect or prevent a student from causing injury to him/herself, or other students, or staff. Procedural guidelines for the use of physical restraint can be found in the Physical Restraint Policy.

Physical restraint should only be used in emergency situations and only after less intrusive approaches have failed and always use extreme caution. Physical restraint is used only when immediately necessary for the minimum time necessary to prevent injury to self or others.

For the purpose of our safeguarding policy, physical restraint is defined as the positive application of force in order to protect or prevent a student from causing injury to him/herself, or other students, or staff.

Examples where physical restraint would be considered appropriate:

- If a child runs away from an adult and is in danger of being hurt eg. falling from a high place or being hit by a vehicle.
- If a child is attacking/hurting another child, an adult should intervene to restrain the child to prevent injury to both children.
- If an older/larger student is being physically aggressive for eg. hitting, kicking, attacking an adult.

Use of physical restraint must NOT be used in the following circumstances:

- As a means of punishment
- As a response to property destruction, disruption of school order, a student's refusal to comply with CIS rules or staff directive, disrespectful verbal comments that do not constitute a threat of imminent, serious or physical harm.

### **Peer on Peer Abuse**

Children and young persons can be capable of harming their peers and as such, all staff should be aware of the *CIS Peer on Peer Safeguarding Policy and the Student Code of Conduct*, which

outlines behavioural expectations for students and disciplinary processes. All staff should strive to ensure that any form of peer abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the child / young person, with full consideration of the impact on that individual child’s emotional and mental health and well-being. Peer-on-peer abuse is never tolerated or minimized as banter or part of growing up.

## Online Interactions

All staff are expected to establish safe and responsible online behaviors, and adhere to the *Acceptable Use Policy (ANUP)* and *Social Media Policy*.

Staff should only communicate with students and parents using their **@cis.edu.sg** email address and the school-approved platforms. See the table below.

Grade Level	Teacher-Student communication tool
N-G2	Parent CIS Gmail/Seesaw/Google Meet
G3-G6	Student and Parent CIS Gmail/Seesaw/Google Meet/Google Classroom
G7-G12	Student CIS Gmail/ManageBac/Google Meet/Google Classroom/Google Chat

Other forms of communication with students, including social media and online forums (Facebook, Twitter, What’s App, WeChat etc.) and text messaging to communicate with students, require the approval of the Vice-Principal and Principal.

Communication with students through online interactions should take place within explicit professional boundaries and maintain the standards of a traditional student-teacher relationship. The following guidelines should be followed

- staff should maintain their own privacy settings on personal online profiles;
- staff should not request or respond to any personal information from students other than which may be necessary for their professional role;
- staff should ensure that their communications are open and transparent and avoid any communication which could be interpreted as ‘grooming behavior’;
- staff should not seek to communicate/make contact or respond to contact with students outside of the direct purposes of their work;
- staff should not give out their personal details (phone numbers, social media handles) unless pre-agreed for work purposes.

Approved methods of communication with parents are:

- School phone. When this is not practically possible (e.g. calls that need to be made outside of school hours) personal mobile phones can be used for this specific purpose but only after approval by the Vice-Principal and Principal.
- Google Meet video conference
- School email

It’s not appropriate to communicate with parents on school related business using social media and online forums (Facebook, Twitter, What’s App, WeChat etc.) or Google Chat.

## Images, Videos, and Other Media

Whilst images are regularly used for positive educational purposes adults need to be aware of the potential for these to be taken and/or misused or manipulated for pornographic or 'grooming' purposes. All staff are expected to establish safe and responsible online behaviors, and adhere to the *Acceptable Use Policy (ANUP)* and *Social Media Policy*.

Staff should:

- Follow the guidelines for using social media outlined in the *Social Media Policy*.
- only retain images when there is a clear and agreed purpose for doing so,
- store images in an appropriately secure place defined by the school (typically Google Drive Folders for short term storage) and delete from any personal device.

Parents are welcome to post photos or videos of their own children at school events on social media, however posting photos or videos of other people's children on social media is not allowed as outlined in clause 9.2 of the terms and conditions of enrollment.

All staff should take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images. This means that staff should:

- only show films or material that have ratings appropriate for the ages of the children intended to view. It is important to also consider the diverse nature of our school and the varying values and belief systems represented in it. If there is a question about whether a film or material would be appropriate, employees should seek permission from their direct supervisor,
- under no circumstances should any adult-use school setting or equipment to access pornography. Personal equipment containing pornography or links to it should never be brought into or used in the workplace.

## Generative AI

The following uses of AI are prohibited.

Inputting sensitive or personally identifiable information (PII) into Large Language Models without explicit authorization is prohibited because it violates the Singapore Personal Data Protection Act and the school's AI Policy.

Deep fakes or AI manipulated media images, videos, or audio that have been altered or generated in a way to cause harm is a form of abuse because it endangers an individual's psychological and emotional well-being. Creating or distributing deep fake content is prohibited.

## Activities off Campus

The *Off Campus Standard Operating Procedures* details how to safeguard students off campus. CIS implements Risk Assessments for all off campus activities (e.g., field trips, excursions, sports trips, etc.) and the same on campus behaviours related to safeguarding are expected for adults taking students off campus.

Trip leaders, with oversight from their Divisional Administrator(s) are responsible for ensuring that all potential risks have been assessed, and appropriate precautions are taken. Trip Leaders need to be familiar with the site they are visiting prior to the visit so they can mitigate risk, and be able to carry out all of their assigned responsibilities including those specific to Child Protection. Students need to be briefed on arrival of all potential hazards and how to respond to incidents.

When students and adults travel to and from a venue, students are required to wear their CIS uniform (or approved traveling uniform) and adults are required to wear a CIS shirt and ID card. The dress code must be outlined in the packing list.

For all school trips where students stay overnight, the trip is vetted and approved by the respective Divisional Administrator. For overnight trips staff and volunteers need to be prepared to be called on at any time (24 hours a day) for emergencies or incidents involving students.

Staff and parent volunteers should not:

- adults should not share sleeping quarters with students. An exception is a nurse caring for a sick child.
- drink alcohol or use illegal substances. Smoking tobacco is not permitted in the presence of students.
- transport students in private vehicles except in cases where the parent/guardian has given permission and this is agreed by a direct supervisor, and the student.

External providers, camp and activity providers are not permitted to use photos of CIS students for their own marketing. Providers can reshare photos and videos posted through CIS official channels.

## **PE Activities, Equipment and Facilities**

This Risk Assessment for the Physical and Health Education (PHE) programme identifies potential hazards associated with activities, equipment, and environments used during lessons. The aim is to ensure the health, safety, and wellbeing of all students, staff, and visitors involved in PHE activities. Each identified hazard has been assessed in terms of the likelihood and severity of potential harm. By highlighting key risks and detailing practical, preventative strategies, this risk assessment supports a safe and inclusive learning environment where students can fully engage in physical education with confidence.

## **Confidential Data**

Confidentiality is paramount in all matters related to child safeguarding. Confidential data at CIS is defined as information that is highly restricted and should only be accessed by individuals with a legitimate need-to-know.

When personal data is collected by CIS for the purpose of supporting the operations of the school all collection, use, disclosure, or processing of data is undertaken in compliance with Singapore's Personal Data Protection Act 2012 ("PDPA"). Personal data may be used by CIS before, during or after a student's enrollment with the school.

Student and staff information is intended for internal use only. Procedures for managing confidential student information (records) are outlined in the *Managing Student Records Protocol*. Records include but are not limited to student academic, behavioural and disciplinary information, educational assessments, legal records, sensitive family information, medical and health records, and information maintained in any medium including email, chat, social media, photographs, computer storage media, video and audio clips and films.

In addition, the following guidelines are followed

- A student's first name and initial of their last name is to be used in any communication, celebratory news etc;
- A staff member must not reveal or disclose any sensitive information about a student or staff member with anyone, except under certain circumstances agreed to by both parties;
- If a staff member is in doubt about whether to share information or keep it confidential they should seek guidance from their Principal and/or Vice-Principal;
- Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis;
- Staff should not engage in 'gossip' which could be damaging to individuals or the school;
- Staff have a responsibility to be aware of their surroundings and ensure that confidential conversations take place in an appropriate environment;
- Staff should never use confidential or personal information for their own, or other's advantage (including that of partners, friends, relatives or other organizations);
- Any legal inquiries regarding the release of personal information should be directed to the Director of Operations and Head of School.

## **Family Dynamics**

If a staff member becomes aware that the dynamics of a family have changed and this may negatively impact a child's emotional well-being this should be logged in CPOMS. This could include parents undergoing separation, divorce proceedings, or a death in the family.

## **Campus Security**

The Head of Facilities is responsible for ensuring that all facilities are secure and appropriate to respect the safety and wellbeing of students.

Facilities are regularly reviewed in terms of safety and security. Evacuation and fire procedures are reviewed annually and drills are regularly conducted.

The school maintains 24-hour security of the campus. Security guards are present on campus at the school gates and entrances for the entirety of the school day.

All parents and staff entering the school are required to show their CIS identification and wear it at all times. Some housekeeping and maintenance staff will wear a CIS logo polo shirt instead of the lanyard if their role makes wearing a dangling lanyard a safety hazard.

If you are expecting visitors (including CIS alumni and ex-CIS staff), you can pre-register guests through the SwipedOn app (Download for iOS &/or Android) or website. Once in the app/website,

click on the 'Add Visitor' Button and follow the steps. Staff who are expecting visitors will receive an email notification once their visitor has signed-in at the Security Post at Jurong West / Boon Lay. Alternatively you can inform [security@cis.edu.sg](mailto:security@cis.edu.sg) with the name of the visitor, date and time of visit, and visitor vehicle number. Visitors will need to show a photo ID.

Visitors are issued with a purple visitor lanyard. A visitor sticker will be used for all contractors on site. For special events (i.e. Open House, workshops, etc...) purple lanyards will also be issued. On the back of the visitor pass is important safeguarding information including not to take photos of our students and to only use adult designated washrooms. If any faculty or staff member finds visitors without a pass, they must inform the Head of Security, Mr Chew or their Principal.

## **Recruitment**

### **Teachers and Administrators**

The school's approach and commitment to safeguarding is visible on the school's website. CIS requires school administrators to make personal reference checks on teachers and administrators before offering a position and specifically ask if the individual has ever been the subject of any allegations or concerns raised in relation to the safety or welfare of children or their behavior with children.

All administrators, teachers and IAs, full or part time, must have a clean criminal record from any country where they have lived in the past 10 years. This is irrespective of if they were working in schools or otherwise. This process is coordinated through the HR department. CIS does not currently require criminal checks for operational staff.

## **Facilities**

### **Toilets**

Toilets are designated as being either for adult use or student use throughout the school. Adults are not permitted to use toilets that have been identified specifically for a child or young person unless they need to accompany their own child or unless arranged otherwise by school administration. Staff have the responsibility to keep main doors open while actively supervising toileting.

Toilets need cleaning up to 5 times a day and housekeeping staff will wherever possible endeavour to clean toilets when they are not being used by students. Male housekeeping staff will not go into toilets designated for female students and female housekeeping staff will not go into toilets designated for male students.

### **Changing Rooms**

Staff should not shower or use changing rooms that are designated for students. Adult showers and changing facilities are available for staff use.

In the swimming changing rooms, male teachers and IAs are not permitted to enter the girls changing rooms and female teachers and IAs are not permitted to enter the boys changing room.

### **Visible Spaces (Windows in Doors)**

All spaces in the building need to provide for a line of sight and observation of the interior. Internal classroom windows and doors must not be covered so the entire classroom can be seen at all times. Only selected and secured storage and equipment areas are exempt from this policy.

### **Cameras and CCTV**

Cameras and CCTV equipment is provided and deployed according to safety and protection standards. All areas monitored are public and guidelines are in compliance with privacy stipulations of Singaporean law. Video footage is not shared with students, parents and teachers. The school is required to share with the Police if requested.

### **Staff Training**

All staff employed by CIS will be expected to complete school required safeguarding and child protection training on joining CIS and then every two years. Some staff, depending on their role and responsibilities, may be required to take additional courses or refreshers.

### **Facilities Staff**

Housekeeping, security, maintenance, and Yeap bus transport staff complete on employment an online safeguarding course administered by the HR department. Canteen staff have required training through SODEXO.

### **Operational Staff**

All operational staff complete training on safeguarding practices and child protection.

### **Academic Staff**

All teachers, teaching assistants, coaches, Athletics Director, Head of Aquatics, ECA and Camps Managers and those operational staff who have direct contact with students all require training on safeguarding practices, recognising signs of maltreatment, and how to respond to child protection concerns. In addition all academic staff will participate in the safeguarding refresher during orientation week, and new academic staff will receive an introduction to safeguarding at CIS, including how to report through CPOMS.

### **Safeguarding Committee and Child Protection Team**

Team members will complete advanced training in identifying, responding, and managing child safeguarding concerns and Singapore specific Child Abuse Reporting (CARG) training so they know how to manage reports of suspected child abuse.

### **Recruitment Team**

HR personnel, Operational Head of Departments and divisional Principals responsible for hiring academic and operational staff will complete recruitment training as needed.

## **Student, Parent and Visitor Training**

### **Students**

Advisors, Homeroom teachers, Counselors, PE & Health teachers and the Educational Technology Coordinator are responsible for delivering school adopted age-appropriate curriculum to empower students to protect themselves and report behavior they feel uncomfortable with. The [ISTE](#)

[Standards](#) for students and [Common Sense Media](#) Digital Scope and Sequence is used to support students to recognize the rights, responsibilities and opportunities of living, learning and working in an interconnected digital world, and how to do so in a safe, legal and ethical manner.

### **Parents**

CIS is committed to engaging parents as partners in safeguarding. Opportunities to learn about how CIS safeguards and protects students from harm is communicated through various forums (e.g. school events, parent academies, the safeguarding section of the school website, communication bulletins, and social media channels). The social media policy for parents, found in section 7 of the Parent Handbook, outlines the school's expectations around the use of media of students and school events on social channels.

### **Visitors/Volunteers/ECA/VILP/External Providers**

CIS recognizes the importance of educating all adults who interact with students about our safeguarding policy. Agreements to adherence with our policies are included in contracts as well as provided as part of the *Code of Conduct for Staff and Volunteers* that must be signed in order to work with CIS students. External excursion providers are required to provide an Employee Code of Conduct and Child Protection Policy. They will be verified to ensure that they are aligned with CIS expectations.