



# **OIS Child Safety Policy & Procedures (Community)**

2025-2026



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## Mission

Oasis International School - Kuala Lumpur is a community of students, parents, and qualified educators working together as an Oasis Network School, to instill in our school community:  
a passion for truth,  
a commitment to excellence,  
and an appreciation for diversity.  
Veritas, Virtus, Varietas!

## The Oasis Way

To accomplish our mission, Oasis International School - Kuala Lumpur provides an American education experience that cultivates character, leadership, and innovation.

# NICS/Oasis Child Safety Policy

The Network of Oasis International Schools takes its responsibility to protect and nurture children seriously, creating a safe and positive environment in which to grow. The protection of children is the responsibility of every adult within Oasis. We expect staff to conduct themselves with utmost integrity and professionalism at all times. Working together, we can create a safe, positive, and nurturing environment for children, protecting and safeguarding them to the highest standards possible. Our nurturing is always to be guided by biblical standards of morality, ethics, and prudence. There is no intent, in any way, to usurp a parent's role as the primary caregiver and guardian of their children. However, the responsibility of the parent, as well as of the organization, is to provide a safe and secure environment for all children in our care.

As an organization, Oasis International School is committed to:

- Valuing children and ensuring their safety in all locations and facilities where we are responsible to care for them
- Encouraging and supporting parents/guardians
- Ensuring that all staff involved with children are given support and training in child safety and protection
- Complying with legal requirements in reporting as necessary

Oasis expects proper moral and ethical conduct toward all children who are in the care of Oasis, whether on Oasis property, at an Oasis school, under the care of Oasis staff, or attending an Oasis function. This expectation applies to all staff (expatriate and local), volunteers (regardless of their length of service), employees, associates seconded to Oasis, and partner organization staff working with Oasis. It also applies to any visitors at any school campus. Adult staff and volunteers assume the responsibilities of setting and maintaining clear, appropriate boundaries in all interactions with children. This extends to extra-curricular activities where staff members and volunteers continue to represent the confidence placed in them by Oasis in areas of integrity and in their responsibility to uphold standards of safety and accountability in their interactions with children.

Oasis International School is a member of the Child Safety & Protection Network (CSPN). Oasis' child safety policies and procedures are consistent with the recognized elements of an organizationally mature child safety program adopted by CSPN<sup>1</sup>.

As a part of the Oasis International Schools Network, Oasis International School - Kuala Lumpur has adopted the following Child Safety and Protection policies to guide stakeholders in creating and maintaining a safe environment for our students through transparency and accountability. The focus of this document is child safety. As such, the following policies take into account best practices in the international school community, the legal mandates of Malaysia and the United States of America, as well as the guidelines set forth in the United Nations Convention on the Rights of the Child<sup>2</sup>. All organizational participants who have regular contact with children under the school's care are trained in, sign agreement to, and participate in an annual overview of these policies.

It is the expectation of all school faculty to report any incident. All reports will be addressed within the scope of the procedures outlined in this handbook.

## Code of Conduct for Child Safety

The Code of Conduct is duplicated from the Oasis International Schools Network Child Safety and Protection Code of Conduct which all employees and volunteers must sign before interacting with students.

### 1. **Visibility**

Risk decreases as visibility increases. I will plan my work and interaction with children in a way that increases visibility by others as much as possible.

### 2. **Overcoming Isolation**

Risk decreases as isolation decreases. I will reduce isolation in my interactions with children as much as possible by keeping others informed of or observant of these interactions.

### 3. **Accountability**

Risk decreases as accountability increases. I will interact with children in a mature, capable, safe, caring, and responsible manner with a high level of accountability. I will give and accept feedback from others in order to maintain a high level of professionalism and integrity in interactions with children.

### 4. **Supervision**

Risk decreases as supervision increases. I will welcome supervision and observation of my interactions with children at any time and place.

### 5. **Parental Involvement**

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<sup>1</sup>The Child Safety & Protection Network was formed in 2006. It is a network of like-minded organizations formed to develop common protocols in child safety. This network has developed a common set of recognized child safety elements which includes written policies and procedures, child abuse definitions, screening, a code of conduct for adult interactions with children, training of adults and children in child safety, child care guidelines, child abuse response protocols, and counseling and member care.

<sup>2</sup> In 1989, world leaders made a historic commitment to the world's children by adopting the United Nations Convention on the Rights of the Child – an international agreement on childhood. This document details the [UN Convention on the Rights of the Child](#).

Risk decreases as parental involvement increases. Because parents are ultimately responsible for the care of their children, I will welcome parental involvement at appropriate times and settings.

#### **6. Discipline**

Proper discipline reduces risk. I agree that discipline is best viewed as instructive and corrective and will exercise discipline with my students in a way that is reasonable and healthy.

#### **7. Touch**

Healthy, caring touch is valuable to children, but unhealthy touch is abusive. I agree that healthy touch should be open, age-appropriate, responsive to the needs of the child, and respectful of the child's wishes. I also agree that any touch that could be perceived as sexual in nature is inappropriate and that I will not engage in it.

#### **8. Verbal Interaction**

Words can be used to support and encourage a child, but words used in a wrong way can be destructive. I will use my words to encourage and edify children, and not to demean or damage them in any way.

#### **9. Child-to-Child Behavior**

Positive child-to-child interaction is essential for healthy development. I will, along with members of my team, monitor child-to-child interactions for inappropriate or abusive behavior or neglect.

#### **10. Responsibility**

Acceptance of reporting responsibility decreases risk. I understand and agree that I am responsible to report (as soon as possible and within 24 hours) to my supervisor/director any actual or reasonably suspected abuse or neglect of any child by anyone regardless of where it may have occurred. I will not attempt to handle the situation privately or enter into any private agreement with the offending or accused individual or reporting person.

## **Definitions**

*Child abuse* is the ill treatment of a child<sup>3</sup> by an adult or another child which endangers or impairs the health or safety and well-being of a child. Abuse of a child is any action (or lack of action) that causes injury or endangers or impairs a child's physical, mental, or emotional health and development.<sup>4</sup>

## **Types of Abuse**

### **Sexual Abuse**

*Sexual abuse* is the involvement of a child in any sexual activity. These are activities that he or she does not fully comprehend and is unable to give informed consent, or for which the child is not developmentally prepared and cannot give consent, or that violate the laws or social mores of society. It is an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust, or power. This may include but is not limited to:

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<sup>3</sup> The common legal definition of a **child** is anyone under the age of 18. Oasis considers any student enrolled at a NICS/Oasis school to also be included in this definition and to fall under the protection of these policies, even those who may be 18 or older.

<sup>4</sup> The following definitions are adapted from several organizations including the Child Safety and Protection Network, the Council of International Schools, the United Nations Committee on the Rights of the Child, and Malaysian Child Act 2001 (Act 611)

- A. Verbal: Remarks which include sexual threats, solicitation, innuendoes, comments about a person's body or appearance, inappropriate sexual talking, obscene phone calls, inappropriate text messaging or sending inappropriate images (sexting<sup>5</sup>), obscene or inappropriate sexual talking via the internet (social media<sup>6</sup>, email, etc.), inappropriately affectionate comments, or any verbal expression with intent to arouse or stimulate.
- B. Visual: Indecent exposure, showing, taking, or distribution of suggestive pictures, peeping, leering, or staring. Visual sexual abuse also includes voyeurism<sup>7</sup>, exhibitionism<sup>8</sup>, showing of pornographic material, or the showing of any human sexual activity or simulated sexual activity. This form of abuse also includes filming or photographing pornographic material.
- C. Physical Touching: Physical contact with a person's clothed or unclothed genitals, pubic area, buttocks, or (in the case of a female) breast; causing a child to perform or witness any of these acts. This form of abuse also includes any act in front of or to a child, such as rubbing, holding, or kissing for the purpose of sexual gratification; sexual penetration; or prostitution.

## Physical Abuse

*Physical abuse* is any act that results in a non-accidental physical injury. Inflicted physical injury could represent unreasonably severe corporal punishment or unjustified punishment. Physical abuse may include but is not limited to slapping, punching, beating, kicking, biting, shaking, burning, holding underwater, pulling hair or holding against one's will.

### Parental Discipline

Although discipline should be instructive and corrective rather than punitive, there is an occasional fine line between parental disciplinary practices and physical abuse. Oasis International Schools will not interfere with parental disciplinary matters unless an incident of abuse is clearly suspected or observed (i.e. bruises, marks, emotional distress) or unless there is a pattern of abusive behavior on the part of one or both parents. Oasis International School has defined a pattern of behavior as two (2) incidents or occurrences.

## Emotional Abuse

*Emotional abuse* is defined by a pattern of inappropriate emotionally harmful behavior over time<sup>9</sup>. It includes acts of omission and acts of commission.

Acts of Omission (or "what is not done"): Omission includes the failure to provide a developmentally appropriate and supportive environment, including the availability of a primary attachment figure so that the child can develop a stable and full range of emotional and social competencies commensurate with his or her individual potential and in the context of the society

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<sup>5</sup> **Sexting**: the act of sending sexually explicit messages or photographs, primarily between mobile phones.

<sup>6</sup> **Social Media**: forms of electronic communication or internet sites through which users create online communities to share information, ideas, personal messages, and other content.

<sup>7</sup> **Voyeurism**: obtaining sexual gratification from seeing sex organs and sexual acts; one who habitually seeks sexual stimulation by visual means.

<sup>8</sup> **Exhibitionism**: a perversion marked by a tendency to indecent exposure.

<sup>9</sup> Emotional abuse implies a **pattern** of inappropriate behavior. There is a distinction between one-time inappropriate behavior, which needs to be addressed to prevent recurrence, and repeated action, which could necessitate a report of suspected abuse.

in which the child dwells. Behaviors that fall under omission include, but are not limited to, not expressing or showing love and affection as well as prolonged isolation from the child's parent or caregiver.

Acts of Commission (or "what is done"): This includes acts toward the child that cause or have a high probability of causing harm to the child's health or mental, moral, or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust, or power. Such acts include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, humiliating, screaming, blaming, using sarcasm, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment.

## Neglect

*Neglect* is the failure to provide for the development of the child in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions in the context of resources reasonably available to the family or caregivers. Neglect causes or has a high probability of causing harm to the child's health or physical, mental, moral, or social development. This includes the failure to properly supervise and protect children from harm as much as possible.

Neglect also includes depriving a child of their basic needs of food, clothing, warmth and shelter, emotional and physical security and protection, medical and dental care, cleanliness, education, and supervision.

Children may occasionally disregard proper hygiene, minor medical attention, or even what some adults consider proper protection from the weather. These isolated examples are not considered neglect. Neglect is defined as the failure to care for or give the proper attention to something or someone.

### Expectations of Guardianship

Regarding supervision, all OIS students are expected to be under the care of a primary parent or guardian who is consistently present in the country. The primary parent/guardian is required to provide the school with a Malaysian phone number to contact in case of emergencies. If the primary parent or guardian is out of the country for any period of time, they are expected to inform the school by emailing [attendance@ois.edu.my](mailto:attendance@ois.edu.my) and providing the school with an updated emergency contact in case of an emergency with their child. In the event that the school is made aware of a parent's absence through other means, the CRD will reach out to the parent through email for an updated contact number.

## Symptoms of Abuse or Neglect

Adults should be alert to the physical signs of abuse or neglect, as well as to behavioral and verbal signs a victim might exhibit. A one-time event would not necessarily constitute a potential abuse case; however, sudden unexplained physical or behavioral changes, particularly by children visiting other children in their homes, would warrant some investigation.

### Physical signs may include

- Lacerations and bruises

- Nightmares
- Irritation, pain, or injury to the genital area
- Difficulty with urination
- Discomfort when sitting
- Torn or bloody underclothing

Behavioral signs may include

- Unexplained anxiety when approaching a specific location
- Nervous or hostile behavior toward adults
- Sexual self-consciousness
- “Acting out” sexual behavior
- Withdrawal from usual activities and friends
- Depression
- Self-destructive or aggressive behavior

Verbal signs may include the following statements

- “I don’t like (names a particular person)”
- “(Particular person) does things to me when we’re alone”
- “I don’t like to be alone with (particular person)”
- “(Particular person) fooled around with me”

## Inappropriate Behavior

### Inappropriate Behavior by an Adult

Oasis International School considers behaviors that do not meet the definition of abuse, but do constitute behaviors that are harmful to children, as *inappropriate behavior*. An appropriate action plan will be put in place to provide accountability, mentoring, and counseling to overcome both the behavior and its causes.

At no time will a dating relationship be allowed between a student and an Oasis International School employee or staff member. Parental consent for a relationship that is commonly accepted and defined as inappropriate or abusive does not sanction that relationship nor excuse any resulting behaviors and their consequences.

### Child-to-Child Inappropriate Behavior

If the victim and alleged offender are both children, it is generally considered abuse if there is more than two years age difference between the children. If their age difference is two years or less, it is considered inappropriate behavior and will be dealt with on a disciplinary level. The following actions may involve inappropriate behavior or abuse of one child to another and should be prohibited: bullying, hazing<sup>10</sup>, derogatory name-calling, creating or sharing pornographic content, ridiculing, humiliating, or singling out a child for negative treatment or exclusion. These acts will first be dealt with on a disciplinary level.

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<sup>10</sup>Hazing: harassing, exacting humiliating tasks as a form of initiation into a group, or playing rough practical jokes upon another child



Sexual abuse between individuals under the age of 18 involves any sexual behavior that occurs without consent by one party or as a result of coercion or grooming. There is a difference between normal childhood sexual exploration and inappropriate sexual behavior or abuse.

Other factors considered in evaluating whether abuse has occurred include the following: differences in responsibility, trust, power, development, awareness and understanding, coercion, and threats, whether implied or verbal.

## Additional Note on Abuse Definitions

While it is recognized that local and/or national definitions of child abuse may vary, and there are cultural, religious, and ethnic differences in child rearing and relating to children and understandings of what constitutes child abuse, it is important to remember that all children have basic human rights. Therefore, Oasis International School has utilized common basic definitions of abuse which have been built on international standards. In addition, it is recognized that by adopting internationally accepted definitions by which all staff and volunteers will abide, adults of different cultures and cultural expectations will work together to prevent child abuse.

The question of how to handle “shame-based” rather than “guilt-based” cultural communication styles will be handled in the investigative stage by ensuring that cultural issues are addressed from the outset. Cultural representation during the investigative interview process is recommended.

The head of school and/or a designated school employee is responsible to proactively investigate and know the civil and/or criminal laws that may apply to child safety and protection issues in Malaysia.

# Abuse Prevention

## Screening

### All OIS Staff

Before being hired, all OIS staff complete a written **application** including questions regarding specific employment history, references, volunteer work, contact information for previous employers and questions related to inappropriate behavior or abuse of children. NICS/Oasis Mobilization Specialists.

The Head of School does a personal **interview** with all applicants before offering a position, asking specific questions about the applicant’s interaction with children beyond what is provided on the application forms. These interviews are face-to-face or via video conference. Once a staff candidate is considered, a **criminal background check** is required.

## Contractors

All non-faculty coaches, ASA Instructors and bus drivers will be required to have a background check run through the OIS Venovox System and have a clear record prior to their start day. Any contractor hired for landscaping, cafeteria service, guard or cleaning service are accountable to their place of employment for screening purposes.

## Training and Awareness

### Training of Staff, Contractors, and Volunteers in Child Safety

Oasis staff members, contractors and volunteers undergo training on observing and reporting child safety situations. This training is provided by [Childsafeguarding.com](https://Childsafeguarding.com), an external organization approved by OIS, and required for all. The Oasis International Schools Network Home Office keeps records of all staff who have undergone child safety training.

### Training of Children and Parents in Child Safety

Oasis International Schools will teach a child safety unit annually to all children. This training will include information about the three R's of safeguarding - Recognize, Refuse, Report - and more on what is inappropriate behavior, abuse, and harassment and where to go for help. We will plan one assembly or advisory block per semester for secondary students and one week-long child safety lesson in Eagle's Nest. Reporting links and procedures will be posted in each student bathroom and on the secondary webpage.

Oasis International Schools will provide a Child Protection Parent Tutorial through [ChildSafeguarding.com](https://ChildSafeguarding.com). The child protection tutorial topics covered are: definitions, vulnerabilities, school practices & values, and parent obligations and role in child protection.

## Online Safety

All OIS students are expected to abide by the Responsible Use Agreement found on the MyOIS App when engaging with technology & online interactions. All online classes, including whole group and small group classes, should be recorded when possible. One-on-one online meetings between students and teachers must be recorded. In all calls, students are expected to maintain online etiquette as directed by the school in the Responsible Use Agreement and the Community Handbook, both found on the MyOIS App. Since recording is not possible in breakout sessions on Google Meet, our students are encouraged to report any breach of online etiquette by a fellow student to their teacher or principal, who will take disciplinary action.

# Oasis Child Safety Procedures

## OIS Child Safety Team

The Child Safety Team consists of four or more OIS Staff members, with at least two trained by CSPN in Response Team Training.

### 25-26 Child Safety Team Members:

- Bethany Singh
- Andy Dawson
- Erin Macleod
- Mun Yee Tee
- Yoong Shen Law
- Chad Cavanaugh

This team is responsible for ensuring the safety of all OIS students through quarterly team meetings, annual review of child safety policy documents, and immediate response to Child Safety reports.

## School Campus Procedures

Bullying will be handled on a disciplinary level, unless serious physical harm is done. For more information, please refer to our OIS Anti-Bullying Policy found on the MyOIS App.

**Two-one (2 to 1) rule:** If a student and teacher are meeting together, there should always be at least three people present. If this is not possible, then accountability measures should be taken, such as 1) meeting in a room with windows or in the open, 2) clearly stating on Google calendar that the teacher and student are meeting, 3) letting colleagues and parents know of the meeting.

**Supervision:** Students cannot be on campus without adult supervision/awareness.

**Photos:** Adults should be mindful of children & family rights to privacy when taking photos on campus or of school events. Exercise caution when posting photos in chats or on social media and refrain from using any photos for ill intent.

### Bathroom policies:

- Adults should only use the staff/handicap bathrooms.
- MS & HS students may not use the bathrooms on level 1.
- ES students can use the bathrooms on level 2 when they have specials. However, K4/5 students must go in pairs.
- In the gym, ES should be using the single, handicap bathroom only. The locker rooms are for MS & HS. Staff must use the Staff bathroom.
- OIS Staff have the right to periodically check student bathrooms and locker rooms for the safety of students. When conducting safety checks, staff must stand at the door, identify themselves, ask the students to come out of the bathroom or wait 10 seconds before entering. If safety

expectations are not being met, the staff will ask the students to exit the bathroom or locker room immediately to address the situation.

## Raising a Concern

When any adult in the community has reasonable suspicion<sup>11</sup>, observes, is given a report of child abuse / inappropriate behavior, the adult has two responsibilities - **care & communicate**.

### Care

If a child reports a concern to you, listen with compassion and care, without any attempt to evaluate the credibility of the report at this point. Follow the APA method:

- **Affirmation:** Statements such as, "I hear you", "I'm sorry that you experienced this" can communicate empathy for what they might be experiencing
- **Procedure:** Let the child know what you will do with this information. "I will help you and support you, but we cannot do this alone. I'm going to share this information with our Child Safety Team Lead who will help us move forward."
- **Assurance:** Reassure the child's confidence with statements such as, "It's not your fault", "You've done the right thing in telling me", and "It was right and courageous to tell".

If you observe abuse / inappropriate behavior, remove the child from the unsafe situation and report it to the Child Safety team immediately.

### Communicate

There are two ways to communicate a child safety concern to the child safety team:

1. Fill out the [OIS Child Safety Concern Report Form](#) immediately, without taking action or doing any preliminary investigation. Detail what was learned in writing as soon as possible so that it is remembered fully and accurately.
2. Verbally report it to a member of the OIS Child Safety Team.

The report is the sole responsibility of the person(s) that witnessed abuse and no supervisor, administrator, or board member may impede or inhibit the reporting duties. No person making a report will be subject to any sanction by Oasis International School for making a reasonable report and all reporters will be kept confidential throughout the investigation.

### Confidentiality

Confidentiality is critical both to protect all parties from further harm through exposure and to preserve the integrity of the process. Oasis International School expects that a "need to know" policy will be strictly adhered to throughout the reporting process.

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<sup>11</sup>Reasonable suspicion is defined as being objectively reasonable for a person to entertain a suspicion, based on facts that could cause a reasonable person, drawing on their training and experience (when appropriate), to suspect child abuse or neglect.