Safeguarding Policy

For the Scholars Hall community

Safeguarding contacts: Safeguarding Lead — **Cedric Chew**; Co-Deputy Safeguarding Leads — **Edmen Tam** and **Cherry Goh**.

Review: Every 12 months and after any Level 2 or Level 3 matter.

> At Scholars Hall, care extends beyond the lesson. This policy turns that commitment into clear safeguards for students and mentors, with responsibilities for every mentor and team member involved in delivering or managing mentorship.

It supports the Welcome Agreement signed by each family before the first lesson and the Mentor Code of Conduct signed by each mentor before their first student is assigned.

§ 01 Principles

Students and mentors have the right to a safe learning environment. Safeguarding protects both from harm, harassment, intimidation and breaches of personal boundaries. The same reporting and response process applies to whoever raises the concern and whoever is alleged to have caused it, including a mentor, student, parent or another person in the household.

Safeguarding is part of how Scholars Hall plans and delivers lessons. Concerns should be raised early, including incidents that seem minor. No one will be penalised for raising a concern in good faith.

Every concern must be taken seriously and assessed fairly. Hear the relevant accounts without presuming that a report proves wrongdoing. Interim safety measures are protective, not a finding of guilt. No student, parent or mentor will be penalised for reporting in good faith, even if the concern is not substantiated. Internal review must never delay emergency help or an external report needed to protect anyone involved.

§ 02 Responsibilities

Safeguarding Lead — **Cedric Chew**. Receives safeguarding concerns, maintains the incident register, oversees mentor training on the Code of Conduct and reviews this policy annually.

Co-Deputy Safeguarding Leads — **Edmen Tam** and **Cherry Goh**. Either available, uninvolved Deputy acts when the Lead is unavailable or has a conflict of interest. They coordinate external referrals and, with the Lead where appropriate, recommend whether a mentor's engagement should end. References to "the Deputy" mean the Deputy handling that matter; one Deputy must be identified as the contact for each case.

Deputy and Director appointments are separate, even where the same person holds both. A Director who is not involved in the matter approves the final decision to terminate a mentor's engagement or refuse or end a student's service, consistent with section 9 of the Mentor Code of Conduct and section 5B of this policy. The designated Directors are listed in the reporting contacts. Where no Director is independent, an independent reviewer approves instead. A person involved in a complaint cannot decide it by acting under a different title.

Directors — **Cherry Goh**, **Edmen Tam** and **Jerry Goh**. Receive every serious concern within 24 hours and every Level 3 matter the same day. Approve policy changes and oversee decisions involving reports to authorities. Their review must not delay urgent referrals.

Mentors. Follow the code and report and record incidents affecting either students or mentors within 24 hours, or immediately where there may be a risk of harm. No routine lesson log is required under this policy.

Report a concern to the Safeguarding Lead: **Cedric Chew**. If the Lead is unavailable or involved, contact either available, uninvolved Co-Deputy: **Edmen Tam**, or **Cherry Goh**. A concern about a Deputy goes to the Lead or the other uninvolved Deputy. If the Lead and both Deputies are unavailable or involved, contact an available, uninvolved designated Director: **Cherry Goh**, **Edmen Tam** or **Jerry Goh**. If one Director is unavailable or involved, contact another uninvolved Director. No one may handle a concern about themselves. Anyone may contact Police on **999** for immediate danger, **995** for a medical emergency, or NAVH on **1800-777-0000** for suspected abuse or neglect.

For safeguarding concerns, contact **Scholars Hall Admin** on **+65 8091 7278** to obtain the relevant safeguarding contact details. These contacts are for safeguarding matters; other enquiries will be directed to the appropriate team member. If someone is in immediate danger, contact the emergency services directly without waiting for Admin.

§ 03 Selecting mentors

- Scholars Hall assesses new mentors' suitability, including their understanding of professional boundaries and how they would respond if a student shared a safety concern.
- Before engaging a new mentor, Scholars Hall verifies their identity against an NRIC or passport and checks relevant qualifications against original documents or with the issuing institution.
- Scholars Hall obtains and assesses relevant references before approving a new mentor to teach.
- We require every mentor, including local and foreign hires, to complete and sign the worldwide criminal-history and safeguarding declaration in section 9 of the Mentor Code of Conduct before being assigned a new student. The Safeguarding Lead must review disclosures and obtain a Director's written decision before the mentor is approved to teach. We make reasonable efforts to obtain relevant police certificates or criminal-record checks where lawful and available, alongside other proportionate checks. These checks supplement the mandatory declaration; they do not replace it, and the declaration does not replace other available checks. Existing lesson arrangements follow the limited transitional exception in section 9 of the Mentor Code of Conduct.
- We explain the Mentor Code of Conduct to every new mentor and require them to sign it before teaching their first student. Existing mentors must also read and sign the Code and complete the declaration under the transitional arrangements in section 9 of the Mentor Code of Conduct. They do not need to repeat recruitment interviews, identity or qualification verification, or reference checks solely because this policy is introduced. Further checks may be required where a specific concern or information gap warrants them. Experience or seniority does not waive the Code or declaration requirements.
- Police certificates. The Singapore Police Force Certificate of Clearance is for overseas-related use and is not available for local employment screening. We do not require mentors to obtain it for local employment with Scholars Hall. For foreign hires or relevant overseas history, we consider lawful overseas police or background checks where available. If a certificate cannot be obtained, we record the limitation and assess the signed declaration alongside other available checks. An unavailable certificate does not excuse failure to declare known facts.

§ 04 Before the first lesson

- Scholars Hall keeps an electronic copy of the family's signed Welcome Agreement after purchase and before the first lesson.
- Before lessons begin, we agree a suitable lesson setting with the parent, including a shared or visible space, an open door and a responsible adult aged 18 or above remaining at home for home lessons.

- We arrange an approved group channel with the parent for scheduling and lesson arrangements. If direct messaging is used for a student under 18, we inform the parent in advance and confirm an approved channel where messages can be retained and reviewed by the Safeguarding Lead, in accordance with section 2 of the Mentor Code of Conduct.
- We confirm and record the agreed safety arrangements for every home lesson placement. Additional precautions must address an identified safety or support need, not the genders of the mentor and student.
- Scholars Hall records relevant wellbeing information shared by the family when joining and explains the information and safeguarding response procedure to the mentor before the first lesson.

§ 05 Supervision and follow-up

- Keep records when an incident, concern or near-miss is reported. The Safeguarding Lead must follow up reports and agreed actions; no routine lesson log or "nothing to report" entry is required.
- Good care means checking in, not simply waiting for a complaint. Scholars Hall checks privately with both the family and the mentor within the first month and once every 3 months after that. These check-ins give families and mentors a private opportunity to discuss whether they feel safe and comfortable with the lessons. A concern raised by either side must receive the same attention.
- We confirm changes to the lesson setting, schedule or communication channel with the parent, rather than relying on the student's agreement alone.

§ 5A Mentor safety during lessons

Scholars Hall must protect mentors from harassment, intimidation and harm during lessons and related contact, including behaviour by students, parents and other household members. These protections apply to every mentor and student. They include female mentors teaching older male students, but sex or age alone does not justify extra restrictions or refusing a student. Apply the same placement checks to everyone; additional precautions must respond to the actual setting, documented conduct or an individual safety or support need.

BEFORE LESSONS BEGIN

- Before lessons begin, the team must share relevant student and lesson information with the mentor, including any safety or support needs they need to know. Record agreed precautions. Mentors may raise concerns or request reassignment; the Safeguarding Lead must assess the request under section 5B. Raising a concern does not give a mentor authority to refuse service on the company's behalf.
- For a home lesson, another responsible adult aged 18 or above must remain on the premises and be readily available throughout. The student does not count as that adult, even if aged 18 or above. Confirm a shared or visible teaching space, an open door and a clear exit route. Where these arrangements cannot be met, use an approved public venue or online arrangement following a safety review by the Lead or an uninvolved Deputy, with a Director involved where section 5B requires approval.
- The team must share Learning Together (see appendix) with students and, for under-18s, their parent or guardian before the first lesson. Mentors should refer to it when addressing behaviour or boundary concerns. For an adult student, agree arrangements directly with the student and keep the Scholars Hall team in the communication channel; involve family with the student's consent or where otherwise lawfully justified. This adult-student arrangement takes precedence over routine parent-contact requirements elsewhere in the document.

WHILE LESSONS ARE ONGOING

- The Safeguarding Lead must have access to the agreed lesson location and expected finish time. Arrival and departure check-ins are required only where the safety assessment under "Before lessons begin" identifies a need for them; they are not a routine requirement for every lesson or every new placement. Where needed, agree the check-in times and a contact who will be available during the lesson. If a check-in is missed, that contact must promptly try the mentor, then the agreed on-site adult, and seek emergency help if there is reason to believe the mentor is in danger.
- Keep contact within approved channels. Mentors are not required to give students personal social media details, accept lifts or discuss their private lives. Recording requires the agreed consent and must not be treated as a substitute for a safe setting.
- The Safeguarding Lead must check privately with the mentor after the first lesson and at each term review. Reassess the placement whenever the mentor raises a concern or the setting changes.

BEHAVIOUR THAT MUST BE REPORTED

Examples include sexual or degrading remarks, comments about a mentor's body, unwanted romantic advances, sexual messages or images, deliberate touching, exposure, threats, following a mentor, blocking an exit, covert filming or attempts to arrange a lesson alone against the agreed rules. Repeated personal questions or contact requests after a boundary has been set must also be reported. Do not dismiss behaviour as a joke or something a mentor should be able to manage.

IF A MENTOR FEELS UNSAFE

- The mentor may stop the lesson and leave, or end an online session, without permission. They do not have to confront the student, give a warning or wait for the behaviour to happen again. Move to safety and call Police on **999** if there is immediate danger.
- Contact the Safeguarding Lead as soon as safe, or the Deputy if the Lead is unavailable or involved. Report the same day where possible and within 24 hours. A late report must still be accepted and assessed.
- **Record the facts when able:** date, time, place, people present, what happened and action taken. Preserve relevant messages and existing authorised recordings securely. Do not circulate material or make a new covert recording to obtain proof. A report must be taken seriously even without witnesses or a recording.

SCHOLARS HALL'S RESPONSE

- The Lead or Deputy must check the mentor's immediate safety as soon as the report is received and agree interim protection before any further lesson. Record the concern and begin the assessment within 24 hours. Keep information restricted to those who need it and explain any necessary disclosure to the mentor.
- The Safeguarding Lead handles communication with the student and family, cancellations and fee questions. A mentor must not be required to negotiate with the person complained about or attend a private confrontation. Use a temporary pause while the immediate concern is assessed; decisions about reassignment, restart or ending service follow section 5B.
- An isolated, non-threatening boundary issue may be addressed with a documented warning and revised arrangements. Sexual harassment, threats, deliberate unwanted touching, stalking or blocked exits require immediate suspension of the unsafe placement and notification to the Directors the same day. Repeated non-serious boundary breaches are assessed under Level 2, with interim protection or suspension where needed; escalate immediately where the conduct indicates Level 3 risk. Seek Police or specialist advice where appropriate; internal review must not delay an external report.
- Hear the accounts fairly and consider the student's age and support needs without excusing harmful behaviour. For a student under 18, also assess whether the behaviour raises a child safeguarding concern under section 6.

- Where a student or family member is the person complained about, the fair process in section 5B applies before ending the service, including hearing their account. Immediate protective suspension does not have to wait for that review. Fee and refund consequences are governed by the service agreement and applicable law; the agreement may provide that no refund is due where service ends because of established misconduct by the student or family. A suspension or unproven allegation does not by itself establish misconduct or create an automatic no-refund entitlement. Any decision based on a continuing unresolved risk must meet section 5B.
- Before any restart, the Lead must document the assessment, necessary safeguards and the arrangements discussed with those affected. An affected mentor will not be forced into an unsafe trial lesson. If the mentor remains unwilling after the assessed risk has been addressed, the Safeguarding Lead must consider reassignment and any separate issue about teaching assignments or the mentor's ability to meet the student's needs under section 5B. This does not automatically justify excluding the student. Do not transfer an unresolved risk to another mentor.
- Offer practical support, including a safe departure, a follow-up check-in, an alternative placement where available and help accessing specialist support. A mentor must not be penalised for a good-faith report or an immediate safety pause. This protection does not exempt separate, evidenced misconduct or failure to meet agreed duties from fair review under section 5B. Record the outcome and tell the mentor what action and protection are in place.

§ 5B Fair decisions about pausing, reassigning or refusing lessons

A safety report must protect the person raising it without unfairly excluding a student. A mentor may stop an immediate situation; Scholars Hall decides what happens to the placement or service. Use the following grounds and process.

GROUNDS FOR A DECISION

- **Pause the current lesson:** the person feels unsafe, there is a specific safety concern, or an agreed safeguard is missing. No prior approval or proof is needed to leave or seek help. Record the circumstances afterwards so the Safeguarding Lead or Deputy can assess arrangements for the next lesson.
- **Temporarily suspend the placement:** the Lead or Deputy identifies a specific unresolved risk, a serious allegation requiring assessment, or essential safety arrangements that cannot yet be met. Record the reason, protective measures and review date. Suspension is not a finding of misconduct.
- **Reassign the mentor or change the setting:** the assessment identifies a manageable safety issue, a teaching or support need beyond the mentor's competence, or a genuine relationship breakdown. Consider supervision, clear behaviour expectations, an appropriate venue, online delivery or a suitably skilled mentor. Describe an ordinary suitability issue honestly; do not label it safeguarding without a safety basis.
- **Refuse or end service on safeguarding grounds:** a Director must approve a documented finding of serious harmful conduct; repeated material boundary or safety breaches despite clear expectations and a reasonable opportunity to correct them; refusal to meet essential safeguards; or a specific continuing risk that cannot reasonably be managed with available arrangements. A serious incident may justify action without a prior warning. Ending one mentor's placement does not itself justify ending the student's service.

Where the facts remain uncertain, Scholars Hall may retain proportionate safeguards or end an arrangement only if it records the specific continuing risk and why safer alternatives are inadequate. Do not describe an unproven allegation as established misconduct. Commercial matters such as fees or availability are handled under the relevant agreement, with their actual reason stated.

WHAT IS NOT SUFFICIENT GROUNDS

Being male or female, age alone, race, nationality, religion, disability, a diagnosis or a stereotype about a group is not grounds to refuse a student. Neither are low grades, slow progress, an ordinary academic disagreement, a reasonable complaint, or a mentor's preference for an easier student. Consider a child's developmental and support needs and reasonable adjustments before deciding that a behaviour or teaching difficulty prevents safe delivery. A diagnosis alone neither establishes nor removes a safety risk.

ASSESSMENT AND ACCOUNTABILITY

- The Lead or Deputy must obtain the specific circumstances, hear relevant accounts separately and assess available information, including messages or witnesses where available. An account can be evidence; lack of a recording or independent witness does not invalidate it. The person reviewing must not be personally involved in the complaint.
- Record the facts established, what remains disputed, the risk, alternatives considered, reasons for the decision, responsible person and review date. Begin the assessment within 24 hours and review any suspension within five working days. If more time is needed, explain why, confirm interim arrangements and set the next review date. Emergency referrals must never wait for this process.
- The Safeguarding Lead manages mentor assignments and changes of mentor; the Lead or Deputy approves safeguarding precautions and temporary suspension; a Director approves refusal or termination of service. We explain the relevant reasons to the student or family and the mentor, and how they can request a review by a Director not involved in the original decision. Where no Director is independent, we arrange an independent reviewer. Notice and fees follow the applicable agreement.

HONEST REPORTING AND PROFESSIONAL RESPONSIBILITIES

An unsubstantiated report, delayed report, imperfect recollection or repeated reporting is not, by itself, evidence of dishonesty. We do not discipline anyone for raising a concern in good faith or seeking protection.

Knowingly inventing an incident, falsifying evidence or using discriminatory grounds to reject a student is serious misconduct and grounds for immediate termination once established through a separate, fair review of the evidence and the mentor's response. Follow section 8 of the Mentor Code of Conduct and the applicable inquiry, notice and termination requirements in section 9 of that Code and the mentor's agreement. An allegation of misuse is not itself proof of misconduct.

We assess teaching or performance concerns separately from safeguarding reports. Where a mentor repeatedly declines agreed work for convenience, is unprepared or cannot meet a student's teaching needs, we review the circumstances, agreed responsibilities and support provided. We address the specific issue through appropriate teaching assignments, training or a fair performance review. A pattern of refusals may justify a discussion and review; it does not establish that safety reports were fabricated. Protection for reporting a concern does not guarantee a preferred teaching assignment or excuse an independently established breach of agreed duties.

§ 06 Responding to concerns

WHAT COUNTS AS AN INCIDENT

An incident is an event, disclosure, complaint or breach of an agreed safeguard that has caused harm, made a student or mentor feel unsafe, or gives reasonable cause for concern about their safety, wellbeing, privacy or professional boundaries. It includes a near-miss: a situation where harm could reasonably have occurred but was avoided. It may happen in person, online or through contact between lessons. Proof of wrongdoing is not required before reporting.

- **Unsafe lesson arrangements:** an unsuitable or isolated space, the required adult being absent, or pressure to continue against the agreed safety arrangements.

- **Boundary or conduct concerns:** inappropriate personal contact, repeated unwanted attention, sexual or degrading comments, threats, intimidation, unwanted touching, or a private meeting that breaches the rules.
- A disclosure or observed concern about abuse, neglect, self-harm or another risk to someone's safety, whether the person at risk is a student or a mentor.
- An injury, accident or near-miss during a lesson that causes harm, requires assistance or reveals a safety risk.
- Unauthorised recording, sharing of private information or images, or a complaint about conduct or safety raised by a student, parent, mentor or witness.

> Ordinary academic difficulties, routine rescheduling, minor lateness or a respectful disagreement do not require an incident report unless they also raise a safety, wellbeing or boundary concern. If unsure, speak to the Safeguarding Lead; they will help decide whether a record is needed.

REPORTING AND PROTECTION FOR BOTH SIDES

Students, parents and mentors may report through the contacts in section 2 of this policy. A student may report through a trusted adult. A person who feels unsafe may stop the lesson and seek help without confronting the other person. The Lead or Deputy must arrange interim protection and support, taking account of a child's age and needs. Scholars Hall must then assess the concern and decide future arrangements under section 5B; a temporary pause is not automatic exclusion.

The levels below guide the response. Assess the actual risk in each case; an example listed at one level may require a more urgent response. The deadlines are maximum response times, not reasons to wait.

If a student or mentor is in immediate danger, call Police on **999**, or **995** for a medical emergency. For suspected abuse or neglect, contact NAVH on **1800-777-0000** for reporting or advice. Do not wait for an internal discussion or proof of an allegation before seeking help.

Listen calmly to a disclosure without pressing for details or promising secrecy. Explain that information may need to be shared with someone who can help. Tell the Lead or Deputy within 24 hours, and immediately if someone may be at risk of harm. Do not repeatedly question the person or conduct an informal investigation. Keep the family informed where safe and appropriate; seek advice before contacting a parent who may be implicated or where contact could increase the risk.

Level 1 — Minor incident or near-miss

An isolated lapse in the agreed rules, or a situation caught before a breach occurs, with no indication of harm or a wider safety concern. It can be corrected promptly. A serious act does not become Level 1 simply because it happened once or caused no visible harm.

Examples include:

- A repeated request for personal contact details that stops after a clear boundary reminder, with no pressure, threats or further unwanted contact.
- A mildly inappropriate, non-sexual and non-threatening remark that stops when corrected.
- A door being closed against the agreed arrangements and promptly reopened, with no attempt to isolate anyone or prevent them leaving.
- A supervising adult briefly stepping away, with the lesson paused until the agreed supervision is restored.
- An isolated learning-related message outside the agreed hours, with no inappropriate content or other boundary concern.

Correct the issue immediately and report it to the Safeguarding Lead, who records the facts and arranges a reminder or coaching where needed. A brief record is enough; routine lessons do not need a log. Continue the lesson only once the agreed safety arrangements are restored.

Escalate repeated conduct or emerging patterns to Level 2, or directly to Level 3 if they suggest harm or serious misconduct. Review minor incidents at the term check-in; do not wait until then to address a developing risk.

Level 2 — Safety or boundary concern

Behaviour or information that raises a safety or boundary concern and needs assessment beyond a simple correction. There is not currently an indication of abuse, serious misconduct or immediate danger; if there is, use Level 3.

Examples include:

- Repeated breaches of lesson, supervision or messaging rules after a reminder.
- Persistent requests for personal contact or private meetings after being declined, without signs of grooming or threats.
- Repeated insults, discriminatory remarks or humiliating behaviour that do not involve threats or suspected abuse.
- A student or mentor reporting pressure to accept an arrangement that makes them feel unsafe, without an allegation of Level 3 conduct.
- A change in wellbeing or behaviour that raises a specific safety concern and needs clarification, without a disclosure or other indication of harm.
- A concern about possible self-harm that does not indicate actual harm or immediate danger. Report it immediately to the Lead or Deputy for assessment and appropriate specialist advice; do not wait for the ordinary Level 2 deadlines. If harm or immediate danger is indicated, use Level 3.

The Safeguarding Lead starts the assessment within 24 hours of the team receiving the report and speaks separately with those involved within 48 hours. Involve a parent or guardian where appropriate and safe. These are maximum response times: act sooner if the risk requires it.

Agree interim protection before the next lesson and pause the placement if safety cannot be assured. Record the accounts, action and outcome. Inform the Directors; serious concerns must reach them within 24 hours of receipt. Keep the affected student or family and mentor informed of the action, while protecting confidential information.

Assess a complaint by what it describes, not simply because someone has complained. If the assessment indicates harm, abuse, serious misconduct or immediate danger, move to Level 3 immediately. A wellbeing concern must not stay at Level 2 for that label alone.

Level 3 — Suspected harm or serious misconduct

An allegation, disclosure or other indication of abuse, serious misconduct or a serious threat to safety. Act on the concern without waiting for proof, regardless of whether it involves a student, mentor, family member or someone outside the programme.

Examples include:

- Alleged assault or deliberate unwanted touching.
- Sexual harassment, sexual contact, requests for sexual images or other sexual misconduct.
- Suspected grooming, including attempts to build a secret or sexual relationship with a student.

- Threats of violence, stalking, intimidation or preventing someone from leaving.
- A disclosure or other indication of physical, sexual or emotional abuse, or neglect.
- A disclosure or behaviour indicating an immediate risk of serious self-harm or harm to someone else.

Immediately stop any lesson, contact or arrangement that may expose a student or mentor to the reported risk, and inform the Directors the same day. The Lead or an uninvolved Deputy must assess the necessary protection promptly and within 24 hours of the report; immediate protective action must not wait for that assessment. A disclosure of abuse does not by itself require lessons to stop. Where the risk is outside the lesson arrangement, continue safe lessons and support unless the Lead's or Deputy's assessment or advice from the authorities indicates otherwise. Call Police on **999** for immediate danger or **995** for a medical emergency. The Deputy handling the matter coordinates referral to Police or NAVH as appropriate, with Directors' oversight. Anyone may make an urgent report directly; internal approval must not delay help.

Record what was reported and preserve relevant messages or other evidence. Follow the disclosure procedure above. Obtain relevant accounts separately without repeated questioning, confrontation or an informal investigation. Do not delay protective action or reporting while gathering accounts, and follow advice from the authorities.

Support the affected student or mentor and keep them informed, involving family where safe and appropriate. Protective action does not itself establish that an allegation is true.

If serious misconduct by a mentor is substantiated, end the mentor's engagement through the approval and termination process in sections 8 and 9 of the Mentor Code of Conduct and section 2 of this policy. If serious misconduct by a student or family member is substantiated, end the placement and decide under section 5B whether the service can safely continue. Do not pass an unresolved risk to another student or mentor.

> **Applying all three levels:** Consider the conduct, context and actual risk, including repetition, deliberate concealment or attempts to isolate someone. Apply the same standards to concerns raised by or about students and mentors. A student's age, sex, disability or need for learning support is not, by itself, misconduct or a reason to refuse lessons. If unsure of the level, seek the Safeguarding Lead's advice promptly and take any necessary protective action while it is clarified.

§ 07 Records and personal data

The Safeguarding Lead maintains one incident register for reports involving students and mentors. Routine lessons do not need an entry. For each report, record the date, time, place, people involved, what happened or was said, who provided each account, immediate action, follow-up responsibility and outcome. A brief factual account is sufficient; the Lead can help record a verbal report. Access is restricted to the Lead, Deputy and Directors, with necessary information shared through authorised safeguarding referrals or as required by law.

Our records reflect the reporting person's own words where possible and distinguish direct observations from information provided by others. We do not add speculation or diagnoses, or treat an allegation as an established fact. Lack of witnesses or a recording is not a reason to reject a report.

We retain lesson recordings for no more than 12 months, unless they are needed for an open concern or a legal requirement. We review retained material when the concern closes and delete it when it is no longer needed for a lawful purpose.

We handle personal data in accordance with the Personal Data Protection Act. Families may submit requests for access, correction, withdrawal of consent or deletion for assessment under the Act. Deletion is not automatic: records may need to be retained for safeguarding, legal or other lawful purposes, and access may be subject to exceptions protecting other people.

§ 08 Legal context

Scholars Hall adopts this policy as its standard for working with children and young people. Relevant Singapore legislation includes the Children and Young Persons Act, the Penal Code provisions on sexual offences against minors and the Personal Data Protection Act. Applicable law takes precedence where it conflicts with this policy.

§ 09 Review and approval

The Safeguarding Lead reviews this policy, the Welcome Agreement and the Mentor Code of Conduct every 12 months and after any Level 2 or Level 3 matter.

The Directors approve changes to this policy. We communicate changes affecting student or mentor safety promptly, including when they take effect and any action mentors must take. Mentor acknowledgement and signing requirements follow the Mentor Code of Conduct and the applicable agreement.

Approved by the Directors

Director's name: **Jerry Goh, Director**

Signature: 

Effective date: **18 September 2026**

Learning Together

A shared guide for students, families and mentors.

We want lessons to be a safe, comfortable place to learn. These guidelines help students and mentors understand what to expect from each other.

§ Be respectful

Speak respectfully and give each other space to explain. Questions, mistakes and disagreements are welcome. Insults, bullying, discriminatory remarks, sexual comments and threats are not.

§ Respect personal boundaries

Respect each other's personal space and privacy. Do not touch someone without their consent, pressure them to share personal information or continue personal attention after they have asked you to stop.

§ Keep messages appropriate

Use the agreed communication channels for learning-related questions and appropriate conversation. Keep messages respectful and within reasonable hours. Arrange scheduling changes through the parent or Scholars Hall team. Adult students can arrange changes directly with the team.

§ Follow the agreed lesson arrangements

Use the agreed lesson space and follow any supervision or recording arrangements. Do not take or share photos, videos or recordings of another person without permission. Mentors must also follow the stricter photography and recording rules in the Mentor Code of Conduct.

§ Speak up if something feels wrong

You can ask to pause a lesson and contact the Scholars Hall team if you feel uncomfortable or unsafe. You do not have to confront the person involved. Raising a concern honestly will not get you into trouble.

§ If a problem happens

We will listen to those involved and consider the student's age, needs and circumstances. Minor issues will usually be addressed with a reminder and support. Serious or repeated concerns may lead to a lesson being paused, changes to the arrangements or, where necessary, the placement or service ending after a fair review by Scholars Hall.

Respect is something we practise as well as ask for. These expectations apply both ways: mentors must also treat students respectfully, maintain professional boundaries and follow the Mentor Code of Conduct.