

Junior Protection Policy

THIS POLICY APPLIES TO:

- MST Golf Group Berhad
(Registration No.: 199301009307 (264044-M))
- MST Golf Sdn Bhd
(Registration No.: 198901011987 (189294-P))
- MST Golf Management Sdn Bhd
(Registration No.: 200101013452 (549209-A))
- MST Golf Arena Sdn Bhd
(Registration No.: 199801015399 (471528-D))
- MST Golf (Singapore) Pte Ltd
(Registration No.: 200002124N)
- Unless otherwise specified, any other companies that may become subsidiaries of MST Golf Group Berhad after the effective date of this document.

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ADOPTION & REVISION HISTORY:

Rev.	Effective Date	Description	Approved by
0	1 Dec 2023	Formal Adoption	Executive Directors

(SEE NEXT PAGE FOR POLICY)

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1. INTRODUCTION

- 1.1. MST Golf Group Berhad (“Company”), via one or more of its subsidiaries as listed in the first page of this document (collectively including the Company, “Group”), provide golf lessons to students of various ages, including children below 18 years old (“Junior Students”). The Group recognises that Junior Students are more vulnerable to harm and thus require special efforts to provide a caring, positive, safe, and stimulating environment that promotes their social, physical, and moral development during golf lessons.
- 1.2. This policy has been developed in accordance with the principles established by the Malaysian Child Act 2001 (Act 611).
- 1.3. For the purpose of this policy, “Staff” shall include all coaching and non-coaching personnel employed or appointed by the Group, regardless of by way of employment or contract for service.

2. OBJECTIVE

- 2.1. This Junior Protection Policy (“Policy”) aims to:
 - 2.1.1. provide an environment for golf lessons in which Junior Students feel safe, secure, valued, respected, and feel confident, such that they know how to approach adults if they are in difficulties, believing they will be listened to effectively;
 - 2.1.2. raise the awareness of all Staff of the need to safeguard Junior Students and of their responsibilities in recognising and providing early help, and identifying and reporting possible cases of abuse;
 - 2.1.3. maintain a structured procedure within the Group to handle cases of suspected abuse; and
 - 2.1.4. ensure that all Staff who have substantial access to Junior Students have been checked as to their suitability, and given basic induction regarding junior protection and what constitutes safe practice with Junior Students.

3. GUIDING PRINCIPLES

- 3.1. The Group shall ensure that:
 - 3.1.1. it has a Designated Safeguarding Lead (DSL), who has undertaken relevant Designated Safeguarding Lead training or similar, and who undertakes other training as necessary;
 - 3.1.2. all Staff are familiar with the procedures to be followed when a suspicion or allegation of abuse or neglect of a Junior Student is first encountered;

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- 3.1.3. all Staff who deal with Junior Students undertake training to develop their understanding of the signs and indicators of abuse and to equip them with the knowledge and skills necessary to fulfil their responsibilities for safeguarding Junior Students;
 - 3.1.4. all Staff who deal with Junior Students are given a copy of the Policy;
 - 3.1.5. all Staff who deal with Junior Students know how to respond to a Junior Student who discloses abuse, or to information received from any source indicating that a Junior Student may be at risk of harm;
 - 3.1.6. all parents and guardians of Junior Students are made aware of the responsibilities of Staff who deal with Junior Students, with regard to child protection procedures through publication of the Policy, which is available on request and via the Group's corporate website; and
 - 3.1.7. its selection and recruitment of Staff for works involving dealing with Junior Students include checks for their suitability for work with children.
- 3.2. Any deficiencies or weaknesses in the Junior Students' protection arrangements will be remedied without delay.

4. ROLE OF DESIGNATED SAFEGUARDING LEAD

- 4.1. The DSL is responsible for:
- 4.1.1. acting as a source of support, advice and expertise for Staff and others to discuss concerns about possible abuse to Junior Students;
 - 4.1.2. co-ordinating referrals of any alleged cases of abuse of Junior Student within 24 hours of any allegation being made, to the relevant outside agencies;
 - 4.1.3. keeping and providing to the relevant parties written records of concerns about a Junior Student even if there is no need to make an immediate referral;
 - 4.1.4. liaising with other agencies and professionals pertaining to Junior Students protection;
 - 4.1.5. reviewing and updating this Policy in line with changes in legislation and recommended 'best practice' procedures;
 - 4.1.6. keeping the head of MST Golf Academy informed of issues and inquiries pertaining to Junior Students' protection;

5. RECOGNISING ABUSE OR NEGLECT

- 5.1. All Staff should be alert to the possibility of signs of abuse or neglect of any Junior Students – by any party regardless of internal or external to the Group.

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- 5.2. Abuse or neglect of a child can arise through inflicting harm or by failing to act to prevent harm and can take many forms, such as:
- 5.2.1. Emotional abuse - the persistent ill-treatment or rejection of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capacity, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger; or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
 - 5.2.2. Physical abuse - a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.
 - 5.2.3. Sexual abuse - involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, non-contact activities, or grooming a child in preparation for abuse (including via the Internet). Sexual abuse is not solely perpetrated by any one particular gender. Refer to the Group's Anti-Sexual Harassment Policy for more details and examples of what constitute sexual harassment.
 - 5.2.4. Neglect - the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.
- 5.3. Abuse can occur in a variety of circumstances and across all socio-economic groups. Children may be particularly vulnerable where there is a history of family violence, bullying, drug or alcohol abuse, mental health problems, learning difficulties or unemployment. Identification of abuse is rarely straightforward because indications often comprise a complex mixture of medical symptoms, behavioural characteristics and background factors.
- 5.4. The following characteristics in the pupil can be indications of potential abuse:
- 5.4.1. unexplained or unusual injuries;

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- 5.4.2. cuts, bite marks, scalds or bruising;
 - 5.4.3. apparent age of injuries not being consistent with account given;
 - 5.4.4. evidence of injuries being repeated;
 - 5.4.5. evidence of poor overall care and a failure to thrive (e.g. pupil appears dirty and unkempt);
 - 5.4.6. swallowing harmful substances or consuming inappropriate food or drink;
 - 5.4.7. evidence of self-harm or self-mutilation;
 - 5.4.8. unexplained deterioration in learning performance;
 - 5.4.9. evidence of inappropriate sexual activity; or
 - 5.4.10. behavioural or sudden changes in behaviour (e.g. aggression, hyperactivity, nervousness, social withdrawal).
- 5.5. The presence of one or more of these characteristics can only indicate (and not confirm with any certainty) that abuse may have taken place.
- 5.6. The conduct of parents can also be indicative. Inconsistent explanations of their child's injuries, a lack of concern for or general detachment from their child's problems, a refusal or reluctance to allow treatment or discuss problems, and displays of aggressive behaviour towards their child should all alert Staff to the possibility of abuse or neglect.
- 5.7. The Group recognises that children can also be vulnerable to abuse by their peers that falls outside the category of mistreatment that would be dealt with as an incidence of bullying. Such abuse will be taken as seriously as abuse perpetrated by an adult.

6. WHAT TO DO WHEN ABUSE IS SUSPECTED OR DETECTED

- 6.1. Staff acting on personal observation or knowledge or in response to an allegation – who has good reason to suspect that a Junior Student has been abused or neglected in any of the ways described above, or who harbours any other concern for a Junior Student's well-being, has a duty to report the suspicion, allegation or concern to the DSL without delay and without attempting to carry out any investigation.
- 6.2. Any Staff approached by a Junior Student who "wants to tell them something" shall respond promptly and sympathetically and proceed with caution as follows:
- 6.2.1. In the first instance, the Staff approached by the Junior Student has a duty to listen to the Junior Student.
 - 6.2.2. Absolute confidentiality, whether specifically requested by the Junior Student or not, should never be promised since it cannot be guaranteed. If necessary, it

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must be made clear at an early stage in the conversation that any duty of confidence would not prevail over the duty to act on information provided by the Junior Student if such information suggests, for example, that the welfare or safety of the Junior Student or any other person is at risk. If at all possible, the Junior Student's express consent for further consultation should be obtained, but in any event the reassurance can and should be given to the Junior Student that information will only be passed on to those who absolutely have to know.

- 6.2.3. If the conversation initiated by the Junior Student involves any disclosure or allegation of a serious nature, notes should be made as fully and as quickly as possible, including actual words used where appropriate, and a consultation with the DSL secured without delay.
 - 6.2.4. The role of the adult or adults present is to listen, to reassure and, if necessary, to take a written statement as a record of the conversation. They should not probe, ask leading questions, put words into a Junior Student's mouth nor become involved in any form of medical examination. Misguided intervention can jeopardise a police investigation and impede later criminal proceedings.
 - 6.2.5. When the conversation has ended, any further comments or observations should be recorded straight away. The value at any subsequent enquiry or in legal proceedings of notes made contemporaneously cannot be over-emphasised.
- 6.3. The DSL shall ensure that statements and any other relevant records that may be required as evidence are maintained and kept securely. These may be required by the welfare services or the police. (Information relating to actual, alleged or suspected child abuse is exempted from the provisions regarding the disclosure of Junior Student's records.)
 - 6.4. The DSL shall be at liberty to make any referrals to external agencies if necessary.
 - 6.5. If the allegation of abuse is against a Staff, any offer by the accused Staff to resign should not prevent the allegation procedure reaching a conclusion.

7. CONFIDENTIALITY

- 7.1. The Group recognises that all matters relating to Junior Student protection are confidential.
- 7.2. Anyone concerned with a suspected case of abuse should treat all personal information as confidential, taking particular care when dealing with sensitive information relating to the Junior Student and his/her family.
- 7.3. It may sometimes be necessary for a Staff to disclose personal information about a Junior Student to another member of staff of service provider, but this will only be done on a 'need to know' basis.

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- 7.4. All Staff must be aware that they have a professional responsibility to share information with colleagues and other agencies in order to safeguard the Junior Students. Legal and professional obligations will not generally prevent the sharing of confidential information if:
- 7.4.1. the Junior Student and/or the parent consent to the disclosure;
 - 7.4.2. the public interest in safeguarding the Junior Student's welfare overrides the need to keep the information confidential; or
 - 7.4.3. disclosure is required by law or under an order of court.
- 7.5. All Staff must be aware that they cannot promise a Junior Student to keep secrets that might compromise the Junior Student's safety or well-being. In deciding whether there is a need to share information, the Junior Student's best interests shall be paramount.
- 7.6. The Group will always undertake to share the intention to refer a Junior Student to the relevant welfare services with the Junior Student's parents or guardians unless to do so could put the Junior Student at greater risk of harm, or impede a criminal investigation. When there is doubt on this point, the relevant welfare services should be consulted first.

8. STAFF TO AVOID INAPPROPRIATE CONDUCTS OR SITUATIONS

- 8.1. All Staff should take care not to place themselves in a vulnerable position regarding their work with Junior Students in both formal and informal settings. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults where possible, or to notify a senior member of Staff if a one-to-one session is planned.
- 8.2. Communication with Junior Students and parents, by whatever means including those that make use of modern technology, should take place within professional boundaries. Junior Students should never, for example, be accepted as 'friends' on social networking sites, and where Junior Students are already known to a Staff in a family or outside friendship connection, this should be made clear to the Head of MST Golf Academy. Subject matter of a personal nature should be avoided. Staff should be circumspect in their communications with Junior Students to avoid any possible misinterpretation of their motives or behaviour that could be misconstrued. All Staff should be familiar with the Group's Anti-Sexual Harassment Policy.

9. WHISTLEBLOWING

- 9.1. All Staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. Such concerns can be raised via the procedures set out in the Group's Whistleblowing Policy, or if necessary, they should speak in the first instance to the DSL or to the head of MST Golf Academy.

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10. BULLYING

- 10.1. Bullying, or to allow or condone bullying may lead to consideration under child protection procedures. The Group recognises the rapid escalation of what has come to be known as 'cyberbullying': the use of electronic communications technologies (such as e-mail, mobile phone and text messaging, digital photography, instant messaging, personal websites, chat rooms, blogs and social networking sites) to harass, intimidate, insult, abuse, embarrass or otherwise harm or cause distress to others. As with all other forms of bullying, cyberbullying is regarded by the Group as totally unacceptable.

11. MISSING STUDENTS

- 11.1. Where a Junior Student is inexplicably absent from a scheduled golf lesson, the coach must contact the Junior Student's parent or guardian as stated in the Junior Student's records.

12. EXTERNAL AGENCIES

- 12.1. Below are some relevant external agencies to contact (primarily by the DSL):

For Malaysia:

Talian Kasih 15999 (Formerly Childline Malaysia)	This helpline is for abused or lonely children, as well as a helpline for reporting cases of abuse.
Cawangan Perlindungan Kanak-Kanak, Jabatan Kebajikan Masyarakat, Kementerian Pembangunan Wanita, Keluarga dan Masyarakat. (Head Office)	Aras 12 No 55 Persiaran Perdana Presint 4, 62100 Putrajaya. Fax: 03-8323 2052 Phone and email directory for every state available in website: www.jkm.gov.my

For Singapore:

Child Protective Service Helpline	1800-777 0000 MSF_CPSintake@msf.gov.sg
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