



**PERSATUAN PENGGUNA-PENGGUNA PULAU PINANG
CONSUMERS' ASSOCIATION OF PENANG (CAP)**

CHILD SAFEGUARDING & PROTECTION POLICY

1. INTRODUCTION & PURPOSE

The Consumers' Association of Penang (CAP) is fully committed to creating and maintaining an environment where all individuals are treated with dignity, decency, and respect. As an organisation dedicated to rights-based advocacy, consumer education, environmental health, and community empowerment, CAP recognises that children are among the most vulnerable members of society. They face not only physical and emotional safety risks but are also disproportionately exposed to systemic hazards such as environmental toxins, unsafe consumer products, commercial exploitation, and digital harms.

This Child Safeguarding and Protection Policy outlines CAP's institutional framework to prevent, detect, and respond to any form of child abuse, exploitation, or harm. It ensures that CAP personnel uphold the highest ethical standards in all direct and indirect interactions with children, including during field research, community outreach, school-level campaigns, awareness-raising programmes, consumer surveys, and media publications.

2. SCOPE

This policy applies to all individuals acting on behalf of CAP, including but not limited to:

- Permanent and temporary staff members.
- Council members.
- Volunteers, interns, and field researchers.
- External consultants, contractors, and partner organisations participating in CAP-led initiatives.

3. LEGAL AND INTERNATIONAL FRAMEWORK

This policy is anchored in both Malaysian domestic legislation and international human rights standards:

The Child Act 2001 (Act 611): Defining a child as any person under the age of 18, establishing parental and public duties of care, and mandating the reporting of children in need of protection.

The Sexual Offences Against Children Act 2017 (Act 792): Strictly prohibits cyber-crimes against children, child pornography, sexual communication, and physical or digital child grooming.

UN Convention on the Rights of the Child (UNCRC): Specifically upholding the principle that the "best interests of the child" must be a primary consideration in all actions undertaken by civil society organisations.

4. KEY DEFINITIONS

Child: Any individual under the age of 18 years.

Child Abuse: Any act or omission by a caregiver, professional, or adult that results in actual or potential harm to a child. This includes physical abuse, emotional/psychological abuse, neglect, and sexual abuse.

Child Grooming: Behaviours designed to build a relationship of trust with a child (and/or their family) to lower their inhibitions and prepare them for sexual exploitation or abuse, whether conducted in-person or via online digital platforms (as legislated under Act 792).

Child Protection: The responsibility to respond to concerns around child safety or risks of harm or abuse to children, including the risk of physical violence, mental abuse, personal injury, neglect or negligent treatment, maltreatment, exploitation, or sexual abuse.

Child Safeguarding: The responsibility to proactively take preventive action to ensure that no harm is done to children and that children are not exposed to the risk of harm or abuse.

Commercial Exploitation of Children: Market-driven practices that take advantage of a child's developmental vulnerability. This includes aggressive marketing of hazardous or unhealthy products (e.g., junk food, ultra-processed foods), exposure to toxic consumer goods (e.g., lead, cadmium, or phthalates in toys and school supplies), and the unauthorised use of children's identities or likenesses for commercial gain.

Contact with Children: Being in a position where proximity or communication with children is a predictable element of work operations, such as school canteen monitoring, rural community programmes, school gardening projects, educational talks, workshops or public exhibitions.

5. CORE COMMITMENTS & GUIDING PRINCIPLES

CAP integrates the safeguarding methodologies of leading Malaysian and international child protection organisations (including the Child Protection Society Penang, SUKA Society, P.S. The Children, and UNHCR) into its consumer advocacy framework:

A. Zero Tolerance for Abuse and Neglect

CAP maintains a strict, zero-tolerance stance toward child abuse, exploitation, and violence. Any form of abuse perpetrated by CAP personnel inside or outside the workplace constitutes immediate grounds for disciplinary action, termination, and criminal referral.

B. The Best Interests of the Child

In line with international standards, every research initiative, community survey, or public campaign designed or implemented by CAP must prioritise the safety, privacy, and well-being of children over institutional or research objectives.

C. Programmatic Safeguarding in Consumer Advocacy

CAP's outreach programmes intersect significantly with child welfare. CAP explicitly commits to:

- (i) **Product Safety & Environmental Auditing:** Advocate for the elimination of endocrine-disrupting chemicals (EDCs), hazardous plastics and their additives, asbestos, heavy metals and other hazardous substances from consumer products made for children.
- (ii) **Ethical Marketing Advocacy:** Campaigning against irresponsible corporate advertising targeting children under 12 who lack the developmental capacity to critically analyse persuasive intent.
- (iii) **Digital & Cybersecurity Safeguarding:** Raising awareness regarding online grooming and child pornography, while ensuring CAP's own digital platforms remain safe spaces.

6. CODE OF CONDUCT FOR CAP PERSONNEL

All CAP personnel and contractors must strictly adhere to the following directives when participating in CAP work environments:

Expected Conduct (Do):

- (i) **Prioritise Transparency:** Conduct interviews, surveys, or focus group discussions involving children in open, visible spaces where other adults or guardians are present.

- (ii) **Obtain Informed Consent:** Secure clear, documented written consent from a parent or legal guardian, alongside the child's assent, before involving any child in a survey, case study, photograph, or media report.
- (iii) **Respect Physical and Emotional Boundaries:** Interact with children in an age-appropriate, respectful manner. Follow established safety education standards regarding personal space ("good touch/bad touch").
- (iv) **Report Immediately:** Document and report any suspicious behaviour, disclosures of abuse, or environmental hazards affecting children to the designated internal safeguarding coordinator.

Prohibited Conduct (Do Not):

- (i) **No Unsupervised Solo Contact:** Never be alone with a child behind closed doors during field research or community events without another authorised adult present.
- (ii) **No Inappropriate Digital Communication:** Do not engage in private text messaging, social media interactions, or online communication with children met through CAP activities, unless explicitly authorised for programmatic reasons with parental awareness.
- (iii) **No Exploitative Imagery:** Never photograph or film a child in a degrading, compromised, or culturally inappropriate manner. Avoid publishing full names, school locations, or identifiable addresses of vulnerable children in CAP publications or press releases.
- (iv) **No Material Inducement:** Do not offer unauthorised personal gifts, financial incentives, or special favours to individual children outside of structured programme allocations.

7. ETHICAL DATA MANAGEMENT & COMMUNICATIONS

To protect children from digital harms, online tracking, and privacy violations:

- (i) **Anonymisation by Default:** Case profiles of children seeking support or highlighted in CAP consumer alerts must use pseudonyms and omit specific demographic identifiers unless explicitly authorised.
- (ii) **Secure Storage:** All files, photographs, and personal information related to child participants in CAP research must be stored securely on access-restricted servers or files, compliant with data protection best practices.
- (iii) **Dignified Representation:** Visual content must portray children as active, dignified participants in community life rather than objects of pity or exploitation.

8. REPORTING MECHANISMS & PROCEDURES

Step 1: Internal Disclosure

Any staff member, volunteer, or external stakeholder who witnesses, suspects, or receives a disclosure of child abuse or a breach of this policy must report it to any of CAP's Executive Committee member within 24 hours.

Step 2: Internal Assessment & Protection

The organisation will immediately implement protective measures to insulate the child from further risk if the allegation involves a CAP representative.

Confidentiality will be strictly enforced to protect the identity of both the child and the whistleblower, as outlined in CAP's Whistleblowing Policy.

Step 3: Statutory External Reporting (Mandatory under Act 611)

If a child is determined to be in need of care and protection under the Child Act 2001, CAP will fulfil its statutory obligation by immediately reporting the matter to the Department of Social Welfare (Jabatan Kebajikan Masyarakat - JKM) via the Talian Kasih hotline (15999) or to the local Protector.

In cases involving immediate physical threat, digital grooming, or cyber-sexual exploitation under Act 792, a direct report will simultaneously be lodged with the Royal Malaysia Police (PDRM).

9. IMPLEMENTATION, TRAINING & REVIEW

Staff Capacity Building: CAP will provide regular onboarding and refresher sessions on child safety, product hazards, and digital safeguarding, drawing on specialised toolkits from specialised organisations.

Risk Assessments: CAP education and programme officers must include a child-safeguarding risk evaluation during the design phase of any project that involves direct community interactions or school campaigns.

Biennial Review: This policy will be evaluated and updated every two years by the CAP Executive Committee to ensure ongoing compliance with evolving consumer trends, digital challenges, and Malaysian law.

Policy adopted on 20 July 2026

REFERENCES

Laws Of Malaysia

Act 792 Sexual Offences Against Children Act 2017

Act 611 Child Act 2001

<https://www.psthechildren.org.my/>

<https://refugeemalaysia.org/support/child-protection/>

<https://www.unhcr.org/my/what-we-do/safeguard-human-rights/protection/child-and-youth-protection>

<https://www.sukasociety.org/>

<https://cpspg.org.my/>