

CHILD PROTECTION POLICY
保護兒童政策

漢基國際學校
CHINESE INTERNATIONAL SCHOOL

漢基
CIS

Child Protection Policy

[Chinese Version | 中文版]

保護兒童政策

2026-2027

Table of Contents

1. Policy Document Review
2. Scope and Compliance
3. Purpose
4. Definitions of Child Abuse and Maltreatment
   - 4.1. Neglect
   - 4.2. Physical Abuse
   - 4.3. Emotional / Psychological Abuse
   - 4.4. Sexual Abuse
   - 4.5. Digital Abuse and Extortion
   - 4.6. Child-On-Child Abuse
   - 4.7. Historical Abuse
   - 4.8. Domestic Violence
5. Expectations of CIS Staff, Volunteers, and Other Personnel
   - 5.1. Background and Reference Checks
   - 5.2. Acceptance of the Code of Conduct and Child Protection Policy
   - 5.3. Partnerships with External Contractors / Vendors
   - 5.4. Partnerships with External Service Providers (Education)
   - 5.5. Volunteers
   - 5.6. Child Protection Training Cycle
   - 5.7. Disciplinary Action & Other Consequences
   - 5.8. Paid Leave / Suspension
   - 5.9. Additional Information Pertaining to the Hangzhou Campus
6. Expectations of CIS Visitors
   - 6.1. Hong Kong Campus
   - 6.2. Hangzhou Campus
7. Expectations of CIS Parents, Guardians, and Caregivers
   - 7.1. Residency, Emergency Contacts, and Temporary Guardianship Requirements
   - 7.2. Caregivers, Helpers, and Other Household Staff
   - 7.3. Disclosure of Information
   - 7.4. Parents, Helpers, and Bodyguards Accompanying Students on CIS School Trips
   - 7.5. Additional Information Pertaining to the Hangzhou Campus
   - 7.6. Transfer of Records
   - 7.6.1. Admissions to CIS
   - 7.6.2. Transfers to Another Institution

8. Expectations of CIS Students

8.1. Student Handbooks
8.2. Curriculum and Course Materials
8.3. Student Sexual Behavior
8.4. Disciplinary Action & Other Consequences

9. Additional Child Protection and Safeguarding Measures

9.1. Safe Touch Policy
9.2. Physical Restraint Policy
9.3. Self-Harm and Suicidal Ideation School Protocols
9.4. Risk Assessment and Mitigation
9.5. Social Media, Chat Group, and Digital Expectations
9.5.1. Staff & Volunteers
9.5.2. Students
9.5.3. Parents
9.6. Photography

10. Reporting Standards and Procedures

10.1. Responsibility to Report
10.2. Management of a Child Protection Concern
10.2.1. Reporting Suspected Harm to a Student
10.2.2. Reporting Suspected Misconduct by a CIS Member of Staff
10.2.3. Management of Low-Level Concerns
10.3. Disclosure Policy
10.4. Measures to Ensure Confidentiality
10.5. Communication and Coordination in Suspected Child Protection Cases
10.6. Consent to Disclose Information in Suspected Child Protection Cases

11. Key Roles and Responsibilities

11.1. Board of Governors
11.2. Senior School Leadership Team
11.3. Whole School Child Protection Officer & Child Protection Leads
11.4. Additional Responders
11.5. Responders for Concerns Involving Staff Members
11.6. Child Protection Response Team
11.7. Child Protection Committee

Appendix A Signs of Potential Child Abuse and Maltreatment

Appendix B Child-On-Child Abuse Policy

Appendix C Safe Touch Policy

Appendix D Physical Restraint Policy

Appendix E Child Protection Training Cycle

Appendix F CIS Child Protection Response Procedural Flowchart

Appendix G Key Child Protection Personnel Chart

Appendix H Procedural Guidelines for Managing Suspected Abuse or Maltreatment Cases

Appendix I Guidelines for Handling Abuse or Maltreatment Disclosures

Appendix J Mandatory Reporting of Child Abuse

1. Policy Review

Chinese International School's (CIS) Child Protection Policy is a living document mandated for formal annual review. This rigorous cycle ensures that safeguarding practices across both our Hong Kong and Hangzhou Campuses remain strictly aligned with international best practices, evolving statutory requirements, and the specific developmental needs of the children in our care.

To ensure the highest standards of safety and operational integrity, the ongoing implementation of this policy is subject to:

- **Annual Internal Audits:** Systematic reviews of internal procedures and staff compliance.
- **External Audits:** Periodic evaluations conducted by independent experts in the field of child protection.

These evaluative processes are designed to monitor implementation and proactively identify, eliminate, or mitigate risks across all domains of school activities. To ensure the safety of our students remains paramount, CIS reserves the right to amend this policy at any time following internal or external reviews.

Detail	Date
Original Policy Creation	March 2019
Last Policy Revision	May 2026
Next Scheduled Review	May 2027
Reviewing Body	CIS Senior Leadership Team / CIS Board of Governors / CIS Child Protection Committee
Last External Audit	March 2026
External Auditor	International Child Protection Advisors Council of International Schools Affiliated Consultant

2. Scope & Compliance

The CIS Child Protection Policy is authorized by the Leadership Team and formally approved by the Board of Governors. CIS maintains a comprehensive duty of care for all enrolled students, including those who have reached or exceeded the age of 18. This policy applies to both the Hong Kong and Hangzhou Campuses. While both locations operate under a unified safeguarding team and standardized protocols, specific variations are noted throughout this document where the residential nature of the Hangzhou Campus requires additional specialized procedures. Unless otherwise specified, all references to "CIS" within this policy encompass both the Hong Kong and Hangzhou Campuses.

Adherence to this policy is mandatory for all individuals working directly or indirectly with students. This includes, but is not limited to, internal personnel (staff, faculty, interns, volunteers, board members, and other personnel), external partners (contractors, consultants, and community-based organizations), and the CIS community (parents and visitors). Any matters concerning the implementation of this policy should be raised with the CIS Leadership Team or the Whole School Child Protection Officer, and any matters concerning noncompliance should be raised with the Head of School or Board of Governors.

3. Purpose

CIS believes that every child has the right to grow up in a healthy, safe, secure, and supportive environment in order to promote and protect their intellectual, physical, emotional, and social well-being. As a community, CIS values, celebrates, and safeguards all students regardless of physical appearance, ability, gender identity, race, nationality, cultural heritage, sexual orientation, beliefs, age, socioeconomic status, or family background. All students deserve to be safe, acknowledged, appreciated, valued, and respected, and CIS adopts a strict zero-tolerance policy for the maltreatment or abuse of children.

Recognizing the fundamental role that schools play as primary guardians of student welfare, CIS has ratified this Child Protection Policy to provide a comprehensive framework for safeguarding. This document ensures that every member of the community understands the school's proactive approach to child protection and is equipped with clear, professional guidelines for conduct. These measures are specifically designed to prevent and address all forms of maltreatment, including neglect, physical abuse, emotional/psychological abuse, sexual abuse, digital abuse and extortion, and child-on-child abuse. Ultimately, this policy is a core principle that permeates every facet of the school's operations; it guides rigorous safer recruitment practices and personnel screening, dictates standards for professional behavior, and informs the design and delivery of all learning activities and extracurricular programs.

The CIS child protection framework is rooted in a proactive prevention strategy, supplemented by robust, clearly defined protocols for responding to instances where a student is at risk of, or has already sustained, harm. Within this policy, the term "child protection" is used holistically to encompass both general preventative safety measures and targeted interventions for specific cases of concern. While some organizations distinguish between "safeguarding" (proactive mitigation of potential harm) and "child protection" (reactive measures following experienced harm), CIS integrates these concepts into a singular, comprehensive mandate. This ensures a seamless continuum of care that prioritizes the safety, dignity, and well-being of every student across all aspects of the school environment.

In the event a student experiences abuse or neglect in any aspect of their lives, CIS's actions will be governed by Hong Kong/Mainland China law or the laws of other relevant jurisdictions, including but not limited to Hangzhou, China, for the Year 10 residential program. This policy also endorses the United Nations Convention on the Rights of the Child (UNCRC), which has been ratified by China and Hong Kong SAR, and adheres to the guidance provided by the Hong Kong Social Welfare Department (Protecting Children from Maltreatment – Procedural Guide for Multi-disciplinary Co-operation (revised 2026), the Hong Kong Mandatory Reporting of Child Abuse Ordinance, and the People's Republic of China on the Protection of Minors (revised in 2020 and implemented in 2021).

4. Definitions of Child Abuse and Maltreatment

Child abuse and maltreatment are broadly defined as any act of commission or omission that endangers or impairs the physical/psychological health and development of an individual under the age of 18 committed by individuals, singly or collectively, who, by their characteristics (e.g., age, status, knowledge, organizational form), are in a position of differential power that renders a child vulnerable. These acts are not limited to child-parent/guardian situations, but may involve anyone entrusted with the care and control of a child (e.g., child-minders, relatives, teachers, coaches, etc.). Abuse and maltreatment may also be committed by a person unknown to a child. Definitions of abuse can be complex and may also involve culturally-specific child-rearing behaviors, gender and role responsibilities, and expectations. CIS also acknowledges that targeting a person based on identity markers such as race, color, ethnicity, caste, religion, gender identity, gender expression, sexual identity, national origin, citizenship status, socioeconomic status, age, language, or ability constitutes harm and abuse.

The four main traditional categories of abuse and maltreatment are neglect, physical abuse, emotional/psychological abuse, and sexual abuse. CIS also identifies digital abuse and extortion, child-on-child abuse, historical abuse, and domestic violence as substantial risks to children, and includes them in this policy.

All CIS stakeholders should familiarise themselves with the following definitions of what constitutes abuse and its typical indicators, and be vigilant and prepared to report to the Child Protection Officer and/or a counselor if they believe there is reason for concern. Stakeholders are not expected to make a judgment about whether their concerns may ultimately constitute abuse or maltreatment. The Child Protection Officer, in consultation with the CIS leadership and counseling team, as appropriate, will investigate and evaluate the next steps.

It should be noted that children who experience abuse or maltreatment will respond differently, and some children will be more vulnerable than others. Children with special educational needs or with disabilities may face additional safeguarding challenges. Efforts will be made to address any challenges students may face, ensuring effective safeguarding measures are in place.

Further signs and indicators of potential child abuse and maltreatment are listed in Appendix A.

4.1 Neglect

Neglect refers to a severe or repeated pattern of failing to attend to a child's basic needs that endangers or impairs the child's health or development. Neglect can be physical, medical, educational, or affluent.

Physical	Physical neglect occurs when a child's basic necessities for life are not met. This includes the failure to provide adequate food, clothing, or appropriate shelter (including protection from extreme weather). It also encompasses inadequate supervision, where a child is left alone or in the care of an unsuitable person, placing them at risk of physical harm or danger.
Medical	Medical neglect is the failure to provide appropriate and timely healthcare. This includes ignoring medical recommendations, failing to seek professional treatment for injuries or illnesses, and neglecting essential preventive care (such as dental check-ups or required immunizations). In a school setting, this may also manifest as the failure to follow a prescribed medication plan or manage a known chronic condition.
Educational	Educational neglect involves the failure to ensure a child receives a regular and adequate education as mandated by local law. This is characterized by, but not limited to, promoting chronic truancy or frequent unexplained absences, failing to enroll a child in an educational institution, neglecting to provide for or address a child's identified special educational needs (SEN), etc.
Affluent	Affluent neglect occurs in high-socioeconomic environments where a child's physical and material needs are met, but their emotional and developmental needs are ignored. In these cases, parents or guardians may prioritize professional or social commitments over the child, delegating all parental responsibilities to third parties (such as domestic staff or boarding schools) without maintaining a meaningful emotional connection with the child.

4.2 Physical Abuse

Physical abuse is any non-accidental act or persistent pattern of behavior that results in, or has the potential to result in, physical harm, injury, or trauma to a child. This encompasses the deliberate use of force—such as hitting, shaking, squeezing, burning, or attempted suffocation or drowning—as well as the use of inappropriate corporal punishment, disproportionate physical restraint, and providing poisonous substances or drugs and alcohol to a child. Within the CIS framework, physical abuse also includes instances where an injury occurs as a result of an adult's actions, regardless of whether harm was the intended outcome, and extends to the failure to protect a child from known physical danger.

4.3 Emotional / Psychological Abuse

Psychological/emotional abuse refers to a repeated pattern of behavior and/or interaction between the carer and the child that endangers or impairs the child's physical and psychological health, including emotional, cognitive, social, or physical development. It manifests through behaviors such as constant criticism, belittling, and public shaming, as well as emotional coldness, isolation, or the withdrawal of affection as a form of control. This abuse also encompasses terrorizing a child with threats of abandonment, placing them under extreme academic or performance pressure, and corrupting them by encouraging age-inappropriate or harmful behaviors. Ultimately, these actions convey to the child that they are worthless or unwanted, creating a climate of fear and emotional instability.

4.4 Sexual Abuse

Sexual abuse refers to forcing or enticing the child to take part in acts of sexual activity for sexual exploitation or abuse, and the child does not consent to or fully understand or comprehend the sexual activity that occurs, due to mental immaturity. This sexual activity includes acts that have or do not have direct physical contact with children (e.g., rape, oral sex, procuring a child to masturbate others/expose his/her sexual organs, or to pose in an obscene way/watch sexual activities of others, production of pornographic material, forcing a child to engage in prostitution, etc.).

Sexual abuse may be committed inside or outside the home or through social media on the internet by perpetrators acting individually or in an organized manner. It includes luring a child through rewards or other means for abuse, including sexual grooming, which refers to deliberately establishing a relationship/an emotional connection with a child by various means for gaining his/her trust with the intent to sexually abuse him/her (e.g., communicating with a child through mobile phone or the Internet).

In Hong Kong, the age of consent is 16, irrespective of gender and sexual orientation. In China, the age of consent is 14. However, consent must be mutual and can be invalidated by mental maturity, age, or if the case involves any type of exploitation or coercion by a person who is in a position of differential power over the child. Furthermore, if sexual activity leads to sexually transmitted diseases or pregnancy, the case may be considered and handled as suspected sexual abuse.

4.5 Digital Abuse and Extortion

Digital abuse and extortion involve the use of technology to harass, exploit, or coerce a child, fundamentally compromising their safety and digital well-being. Digital abuse encompasses a persistent pattern of technologically mediated harm, including cyberbullying, social exclusion via digital platforms, and the non-consensual sharing of private or intimate images (image-based abuse). This can escalate into digital extortion, or sextortion, where a perpetrator—whether an anonymous predator or a peer—threatens to release sensitive or compromising material unless the child meets specific demands, such as providing additional

imagery, money, or compliance with further abuse. These behaviors are viewed as severe violations of a child's dignity and privacy, manifesting in ways such as the creation of "hate groups" on social media, the use of deepfake technology to disparage a student's likeness, or the grooming of students through online gaming and messaging apps. CIS recognizes that the borderless nature of the digital world means these risks permeate both campus life and the home environment.

4.6 Child-On-Child Abuse

Child-on-child abuse occurs when a child is harmed, exploited, or bullied by another child or group of children. CIS maintains a zero-tolerance approach to such behavior, recognizing that abuse perpetrated by a peer can be just as damaging as that committed by an adult. This form of maltreatment encompasses a wide spectrum of behaviors, including physical aggression, verbal or emotional bullying, social exclusion, harmful sexual behaviors, and digital or image-based abuse. Because these incidents often occur within the nuances of child social dynamics, the school is committed to proactive responses that prioritize the victim's safety while addressing the perpetrator's underlying behaviors. A comprehensive breakdown of definitions, reporting procedures, and CIS's specific framework for managing child-on-child abuse cases can be found in Appendix B.

4.7 Historical Abuse

In cases where historical abuse is disclosed or identified, the Child Protection Officer, in consultation with the CIS leadership and counseling team, as appropriate, will investigate and evaluate the next steps to ensure the child's safety and well-being.

4.8 Domestic Violence

Domestic abuse is any pattern of coercive, controlling, threatening, or violent behavior between adults in a child's household. While the child may not be the direct target, CIS recognizes that witnessing domestic abuse—hearing it from another room, seeing physical injuries on a caregiver, or living in the resulting climate of fear—constitutes a significant form of emotional and psychological maltreatment.

5. Expectations of CIS Staff, Volunteers, and Other Personnel

All CIS staff, volunteers, and other personnel—whether engaged directly or indirectly with students—bear a fundamental responsibility for the safety, protection, and holistic well-being of the student body. This mandate extends to all individuals representing the school, including full-time and short-term employees, sub-contractors, external service providers, volunteers, individual student helpers, and independent consultants.

Regardless of contractual status, all such individuals are strictly subject to the professional standards and boundary expectations outlined in the CIS Staff, Volunteer, and Other Personnel Code of Conduct. Adherence to these standards carries a mandatory requirement to report any suspected instances of child abuse, maltreatment, or safeguarding concerns to the school immediately.

Additionally, if a staff member discovers suspected abuse or neglect of a minor, they have a legal obligation to report immediately to the public security authorities and civil affairs departments, as outlined in Hong Kong's Mandatory Reporting of Child Abuse Ordinance (Cap. 650) and the People's Republic of China on the Protection of Minors. Failure to report suspected serious harm or real risk of harm as soon as practicable can result in legal liability. More detailed information on the Mandatory Reporting of Child Abuse can be found in Appendix J.

5.1 Background and Reference Checks

All staff and volunteers are subject to the school's Background and Reference Check Policy. The policy ensures that all individuals hired to work on campus, to work with students on or off campus, or to volunteer in a supervisory role are subject to satisfactory background and reference checks prior to employment or taking part in any school activity for the first time. Returning staff will be required to have an updated background check every two years.

Additionally, CIS adheres to a comprehensive safer recruitment framework that extends beyond standard background and reference checks. To maintain the highest safeguarding standards, every member of our recruitment team must have relevant, up-to-date training in safer hiring practices and vetting.

5.2 Acceptance of the Code of Conduct and Child Protection Policy

At the time of onboarding, all staff, volunteers, and other personnel will be briefed on CIS's Child Protection Policy and the Staff, Volunteer, and Other Personnel Code of Conduct, and will be required to acknowledge that they have read, understand, and will comply with the expectations outlined.

The Staff, Volunteer, and Other Personnel Code of Conduct varies slightly between the Hong Kong and Hangzhou Campuses, due to the residential nature of the Hangzhou Campus. Both documents are attached below, and a more detailed outline of the key differences for the Hangzhou Campus are outlined below in section *5.10 Additional Information Pertaining to the Hangzhou Residential Campus*.

- Hong Kong Staff, Volunteer, and Other Personnel Code of Conduct
- Hangzhou Staff, Volunteer, and Other Personnel (including visitor expectations)

A new Staff, Volunteer, and Other Personnel Code of Conduct will be completed annually.

5.3 Partnerships with External Contractors / Vendors

External contractors and vendors employed through CIS, or as a subcontractor, must provide an undertaking that the personnel they employ to work at or with CIS will be required to acknowledge that they have read, understand, and will comply with the expectations outlined in both the Child Protection Policy and the Staff, Volunteer, and Other Personnel Code of Conduct. Failure to comply with the expectations outlined in the above documents may result in termination of partnerships.

5.4 Partnerships with External Service Providers (Educational)

External service providers used by CIS for educational purposes will be required to acknowledge that they have read, understand, and will comply with the expectations addressed in the Staff, Volunteer, and Other Personnel Code of Conduct and the External Service Provider Child-Safeguarding Agreement. The external service provider will be required to provide CIS with a complete and accurate list of all personnel who will have direct contact with CIS students, whether through supervision, care, instruction, or any other form of direct interaction, and will ensure that their personnel possess the necessary qualifications, certifications, and credentials required to perform their assigned duties and responsibilities; and have completed all requisite background checks, clearances, and screening procedures as mandated by applicable local laws and regulations.

If an external service provider does not have their own child protection policy, it must either

adhere to CIS's policy or develop their own as a condition of the partnership. Failure to comply with the expectations outlined in the above documents may result in termination of partnerships.

5.5 Volunteers

Prior to commencing any duties involving student supervision—such as serving as trip chaperones or event monitors—volunteers will be required to acknowledge that they have read, understand, and will comply with the expectations outlined in both the Child Protection Policy and the Staff, Volunteer, and Other Personnel Code of Conduct. Furthermore, these individuals must provide a formal undertaking attesting that they have no prior criminal offenses or sexual convictions. These safeguarding protocols are mandatory for all student-facing volunteers, regardless of their prior or current affiliation with the school.

Volunteers engaged in roles that do not involve the direct supervision of students, such as members of the CISPTA General Committee, the Alumni Board, Annual Fund Advocates, or the Phoenix Sports Club, are exempt from the criminal record undertaking. However, these volunteers must continue to have a foundational understanding of the school's child protection framework. They must also formalize their commitment to institutional standards by signing the Visitor Code of Conduct (see the Responsibilities of CIS Visitors for more information).

5.6 Child Protection Training Cycle

All CIS staff will receive and are required to attend child protection training annually to ensure they are aware of their responsibilities towards student safeguarding and well-being, as well as reporting procedures and referral routes. Attendance is mandatory and will be recorded internally.

Externally contracted staff that will be working directly with students, including but not limited to bus drivers and monitors, security guards, catering staff, coaches, cross-curricular program staff, student helpers, etc., will also be required to attend training.

Members of the CIS's Leadership Team and all designated Child Protection Officers are required to undergo advanced-level training in child protection that must be refreshed every three years. It is also expected that during the interim period between advanced-level training of a comprehensive nature, they will also take part in presentations, conferences or other professional development in various specific topics that will enhance their ability to improve child protection at CIS.

A detailed overview of CIS's Child Protection Training Cycle can be found in Appendix E.

5.7 Disciplinary Action & Other Consequences

Any individual whose conduct is deemed inappropriate, harmful, or otherwise inconsistent with the Staff, Volunteer, and Other Personnel Code of Conduct shall be held personally liable for their actions. Such behavior will initiate formal disciplinary proceedings, which, depending on the severity and nature of the misconduct, may result in immediate summary dismissal. Furthermore, acts of non-compliance may lead to civil litigation and, where applicable, criminal prosecution.

CIS explicitly classifies any incident involving the actual or potential harm, abuse, or neglect of a student as gross misconduct. Under these circumstances, CIS reserves the right to terminate employment or service agreements effectively and immediately, without notice or compensation in lieu of notice, to ensure the continued safety and integrity of the school community.

5.8 Paid Leave/Suspension

In the event of a formal investigation, the school reserves the right to place any involved staff member on administrative leave or suspension with full pay and benefits, as deemed necessary to ensure the integrity of the process and the safety of the school community. Furthermore, the school maintains the prerogative to report any complaint or finding of misconduct to the police or relevant governmental authorities within the jurisdictions of Hong Kong, Hangzhou, or any other applicable region. Individuals found to be in violation of this policy may be subject to criminal sanctions under local laws, as well as civil liability and subsequent legal action under relevant legislation.

5.9 Additional Information Pertaining to the Hangzhou Residential Campus

Caregivers, private cleaners or anyone regularly visiting campus or living on campus for an extended period of more than 48 hours must undergo formal Child Protection training and read, sign and uphold the Staff & Volunteer Code of Conduct. After such training, they will be given residential swipe cards, which give access to the lift and front door of their residence only. Non-lift access should only be used in exceptional circumstances and with prior approval from the Deputy Director or Director. Like any other visitor, they should not enter other areas of the Residential and Academic Buildings without a staff chaperone. General access to the corridors and rubbish bins is only permissible for those of the appropriate gender. Such persons must wear their visitor badge at all times.

Any external contractor, facilities technician, or maintenance provider entering the residential corridors for short-term repairs or upkeep must be fully chaperoned by a member of the CIS Hangzhou staff at all times. No external worker is permitted unsupervised access to student residential wings or private dorm rooms, regardless of whether students are currently present on the floor.

In addition, the Hangzhou Residential Campus operates under a unique 24-hour duty of care, where the lines between academic instruction, pastoral guidance, and residential life naturally intersect. To preserve the safety, dignity, and privacy of both students and personnel in this boarding environment, the school enforces additional protocols. These protocols establish transparent, non-negotiable operational boundaries that govern daily interactions within living quarters and common areas. By defining these physical and professional parameters, the school ensures a secure, predictable environment that mitigates risks inherent to residential care while upholding the highest standards of professional integrity.

- **Adult Access for Dorm Entry**: Non-residential staff should never enter a student's dorm room under any circumstances without prior permission from the Director. Residential staff may enter a dorm room to enforce routines and expectations, however, staff must take precautions when entering dorm rooms. Staff must never enter a student's room physically while students are changing or in a state of undress. Unless there is an urgent situation, staff must announce their presence loudly from outside the closed door, await a verbal response, and remain in the threshold of the open doorway unless an immediate emergency dictates entry. If a staff member does enter a student room, the door to the room must remain open to maximize visibility. Staff should avoid spending more time than necessary in a student room, especially in a 1:1 situation, and should invite students to a common area for extended conversation.
    - Staff should avoid touching a student's belongings in their room or enter their personal living space. In the event of a room search, there must be two adults present in the room with prior approval from the Director or Deputy Director.

- **Dress Code for Common Areas**: Strict guidelines on appropriate attire for both faculty and students in common spaces that are shared between opposite genders.
- **One-on-One Private Spaces**: Staff are prohibited from hosting students in private, closed-door faculty apartments or closed-door staff offices without prior parental or Director authorization. If one or more students enters a staff residence, the door should remain open with visibility to common spaces, there should be an educational reason for the visit, one or more staff members must be present throughout the visit, professional boundaries as outlined in the staff handbook must be maintained, and personal visits of any kind should be avoided.

6. Expectations of CIS Visitors

The school maintains a welcoming environment for all guests; however, the safety and security of our students remain the paramount priority. Consequently, all visitors are expected to uphold the highest standards of conduct and adhere to the school's safeguarding protocols for the duration of their time on campus. By entering the premises, visitors acknowledge their shared responsibility in maintaining a safe environment and agree to comply with the behavioral expectations and reporting obligations outlined in the respective campus's Visitor Code of Conduct. This commitment ensures that every individual on our campus, regardless of the duration of their visit, acts in the best interest of our students and contributes to a robust culture of institutional vigilance and protection.

6.1 Hong Kong Campus

Upon entering the Hong Kong Campus, all visitors must report to the New Tower or Moongate entrances, where they will acknowledge that they have read, understand, and will comply with the expectations outlined in the Hong Kong Visitor Code of Conduct. While on campus, visitors must keep their visitor badge prominently displayed at all times. A list of Visitor 'Do's and Don'ts' is also displayed at school entrances and on the back of all visitor badges. Before leaving, visitors must return their badge and sign out at the New Tower or Moongate entrances.

6.2 Hangzhou Campus

On arrival, all visitors must report immediately to the Guard Station at the main entrance to the Residential Building where they will acknowledge that they have read, understand, and will comply with the expectations outlined in the Hangzhou Visitor Code of Conduct. While on campus, visitors must keep their visitor badge prominently displayed at all times. A list of Visitor 'Do's and Don'ts' is also displayed at school entrances and on the back of all visitor badges. Before leaving, visitors must return their badge and sign out at the Guard Station at the main entrance to the Residential Building.

Visitors are not permitted access to the Residential and Academic Buildings unless chaperoned by a member of the Hangzhou staff. This rule also applies to parents/guardians, students' extended family and other guests of students. Such persons may request access to the Residential Building up to 9pm, but permission must be requested in advance from the Director.

As the CIS Hangzhou Campus is located inside the Greentown School Community, CIS students and staff are encouraged to be hospitable to our friends and neighbours. However, visitors must be accompanied at all times and must never be given independent access to the Residential and Academic Buildings.

On special occasions, the Hangzhou Campus premises will be open to all visitors. Visitors should note that during these occasions, members of staff will be assigned duties to monitor the

premises and may ask visitors to identify themselves. Access to dormitories, the entire Residential Building, or other areas may be restricted at the discretion of the Director.

CIS students are also given clear training and instructions regarding the Hangzhou Visitor Policy, specifically in that they are not allowed to give access to anyone into the Residential or Academic Buildings who is not a CIS staff member or volunteer. This applies to parents/guardians, students' extended family and other guests of students. Students are instructed to immediately report to a member of staff if there is a suspected problem or notice a stranger unaccompanied by a CIS staff member. If students have enquiries, they must be directed to the Deputy Director or Director.

7. Expectations of CIS Parents, Guardians, and Caregivers

CIS recognizes that the safeguarding of children is a collaborative endeavor that relies upon a transparent and proactive partnership between the school and the home. Parents, guardians, and caregivers are essential stakeholders in this framework and are expected to uphold the school's child protection values by fostering an environment of safety, respect, and open communication. This responsibility includes familiarizing themselves with the school's child protection protocols, ensuring their children understand personal boundaries and safety, and promptly reporting any concerns regarding a student's well-being to the school's designated Child Protection Officers. By enrolling their children at CIS, parents and guardians commit to supporting the school's mandatory reporting obligations and participating in a shared culture of vigilance, ensuring that the protection of the child remains the primary focus of all adult interactions and institutional decisions.

As a condition of enrollment, parents and guardians are required to formally acknowledge their commitment to the school's child protection policy on an annual basis. During this process, families must verify that they have reviewed, understood, and will abide by the Child Protection Policy and all associated institutional procedures, including the specific campus's Visitor Code of Conduct. To support this commitment, CIS provides parents with annually updated resources and guidance designed to clarify the school's protective protocols and ensure a unified approach to student safety between the school and the home environment.

Additional aspects of CIS's full comprehensive child protection program are covered in other policies, procedures or guidelines found in the Parent Handbooks. Failure to adhere to any expectations and responsibilities will result in discussion with CIS about the child's future enrollment status.

7.1 Residency, Emergency Contacts, and Temporary Guardianship Requirements

CIS requires that at least one parent/guardian be in full-time residence in Hong Kong with their child. The school expects that CIS students will receive close adult care and supervision in their home environment at all times and, regardless of age, will not be regularly left alone or unsupervised. This includes times when Hangzhou students are on break and away from campus.

Parents are also reminded of the requirements to supply and maintain up-to-date contact details for two emergency contacts, who must be adults who can act on behalf of parents if parents cannot be contacted, and also supply temporary guardian information every time that both/all parent/guardian(s) of a student are absent from Hong Kong. This information can be updated directly in PowerSchool.

7.2 Caregivers, Helpers, and Other Household Staff

It is the responsibility of CIS parents to ensure that any caregivers, helpers, or other household staff involved in the care of their child, and who may or may not come onto the campus, understand and abide by the Child Protection Policy and all associated institutional procedures, including the specific campus's Visitor Code of Conduct.

For CIS students that will require a personal helper to be on campus for support, the helper will receive formal Child Protection training and read, sign and uphold the Staff, Volunteer, and Other Personnel Code of Conduct for the respective campus where the student is attending.

7.3 Disclosure of Information

It is the responsibility of CIS parents to disclose any information that may affect their child's school experience, including but not limited to medical conditions, and learning, behavioural, psychological or emotional needs or concerns. CIS parents should keep their children's school directory profiles up to date and promptly communicate with the Homeroom teacher/Advisor/Head of House, school nurse, school counsellor or other relevant member of staff any changes.

7.4 Parents, Helpers, and Bodyguards Accompanying Students on CIS School Trips

If a parent, personal helper, or bodyguard must accompany a child on a school trip, CIS requires all external personnel to agree to a formal set of guidelines. These agreements outline the terms, conditions, and expectations that must be adhered to ensure the safety, privacy, and educational integrity of the trip for all CIS students.

- Agreement for Parents Accompanying Students on CIS School Trips
- Agreement for Personal Helper Accompanying Student on CIS School Trips
- Agreement for Bodyguards Accompanying Students on CIS School Trips

The specific above agreements must be signed, along with the respective campus's Staff, Volunteer, and Other Personnel Code of Conduct, and a recent photograph and a copy of the individual's official identification must be provided.

7.5 Additional Information Pertaining to the Hangzhou Residential Campus

Parents and guardians of students who are currently enrolled in Hangzhou are reminded that they, or another formally designated adult, will be required to meet students returning from the Hangzhou Campus or any other associated trips at designated pick-up points, such as the airport or school, rather than allowing children to return home on their own. Any other arrangements must be cleared with the Hangzhou Director.

7.6 Transfer of Records

To ensure continuous protection and a seamless transition for students, CIS maintains rigorous protocols for the transfer of safeguarding and child protection records. These procedures ensure that CIS receives important information regarding new students, and that receiving schools are equipped with the necessary context to support a student's well-being after leaving CIS.

7.6.1 Admissions to CIS

After a new family accepts enrollment at CIS, the Child Protection Officer will issue a formal safeguarding request to the student's previous school. This proactive step ensures that any historical context regarding a student's safety is integrated into CIS's internal systems immediately.

7.6.2 Transfers to Another Institution

When a student leaves CIS for another institution, the sharing of information is governed by data privacy laws and the school's commitment to the student's best interests.

- **Consent Protocols:** CIS will make every effort to obtain written parental or guardian consent (or student consent if the individual is 18+) to facilitate any transfer of information.
- **Exceptional Circumstances:** If seeking consent is reasonably judged to put the student at further risk, CIS reserves the right to share relevant information with the receiving institution without explicit approval to ensure the child's safety and well-being.
- **File Preparation and Redaction:** Before any data is exported (typically as an encrypted PDF), the Child Protection Officer must perform a data privacy check to ensure:
  - **Anonymity of Third Parties:** All names other than the student's (e.g., peers or unrelated individuals) are removed.
  - **Objective Accuracy:** The record is purely factual and correct, containing no assumptions or emotional language.
  - **Secure Transmission:** Records must be shared via secure data transfer platforms or encrypted email to remain compliant with privacy regulations.

8. Expectations of CIS Students

CIS believes that empowering students to be active participants in their own safety is a cornerstone of a robust child protection culture. While the primary responsibility for protection lies with the adults in the community, students are encouraged to play a vital role by developing an age-appropriate understanding of personal boundaries, mutual respect, and digital citizenship. CIS expects students to contribute to a supportive school environment by treating their peers with dignity, upholding the standards of the Child-on-Child Abuse Policy, and looking out for one another's well-being. Students are encouraged and supported in reporting any behavior that makes them feel unsafe or uncomfortable, whether that behavior involves a peer or an adult. By fostering self-advocacy and a collective commitment to safety, CIS ensures that students are not only protected but are also equipped with the confidence and knowledge to navigate the world securely.

8.1 Student Handbooks

As a core expectation of their enrollment, students are required to adhere to all institutional policies and procedures detailed within the CIS Student Handbook and Child Protection Policy. This includes all policies and procedures surrounding attendance and punctuality, behavior, anti-bullying, drugs and alcohol, code of conduct for trips, responsible use of technology, etc. Collectively, these documents establish the behavioral framework necessary for maintaining the integrity and safety of all CIS students.

- CIS Student Handbook

These expectations apply equally to CIS students studying in Hangzhou. However, Hangzhou also has additional expectations of students that take into consideration the residential nature

of the program.

- Hangzhou Student Handbook

8.2 Curriculum and Course Materials

CIS is committed to delivering a robust, age-appropriate safeguarding curriculum across all year levels, ensuring that every student understands their fundamental rights, personal boundaries, and collective responsibilities. This integrated educational framework is designed to empower students with the critical thinking skills and emotional intelligence necessary to navigate complex issues, including the identification of abuse, protective behaviors, and the prevention of child-on-child maltreatment.

The curriculum further addresses the nuances of the modern world through specialized instruction in digital literacy, the responsible use of social media, healthy relationship dynamics, and comprehensive sexuality education. By fostering an environment of transparency and trust, these programs also ensure that students are explicitly informed of the school's internal support structures. Students are taught how to access designated Child Protection Officers and trusted adults, and are encouraged to report any concerns for their own well-being or that of their peers.

8.3 Student Sexual Behavior

CIS recognizes that sexuality is a fundamental aspect of human development and that learning about this dimension of the human experience is a standard component of childhood and adolescence. Accordingly, CISl is committed to providing age-appropriate, evidence-based education to support students' healthy development and understanding.

Simultaneously, CIS maintains that all community members have a right to an educational environment and school-sanctioned activities that are free from sexualized behaviors. CIS therefore adheres to a strict zero-tolerance policy regarding sexual activity and prohibited physical intimacy on all school campuses and during school-related events. This encompasses a broad spectrum of behaviors, including non-physical acts such as "sexting," the digital transmission of explicit material, and other online or offline behaviors of a sexual nature. Should CIS students engage in prohibited sexual or physically intimate activity, the school will conduct a comprehensive, case-by-case review. This assessment will result in a tailored action plan designed to address the specific behaviors of concern, mitigate any physical or psychological impacts, and determine appropriate disciplinary sanctions.

Furthermore, CIS's response includes a critical determination of whether such actions constitute inappropriate sexual behavior or abuse. CIS explicitly defines sexual behavior involving a student or students as abuse if it occurs without the informed consent or understanding of all parties, involves any element of coercion, or takes place within a context of disparity regarding age, responsibility, trust, or power. Such incidents will be managed with the highest level of child protection urgency and may be subject to external reporting in accordance with jurisdictional laws.

To maintain a secure, respectful, and structured residential environment in the Hangzhou Campus, CIS enforces a strict co-habitation protocol. Under this protocol, unauthorized room-swapping and entering the dormitories or residential wings of a different designated gender or cohort past curfew are explicitly prohibited. To ensure the immediate well-being of all parties involved, CIS reserves the right to physically segregate students to stabilize the environment and prevent further risk while a formal and thorough investigation is actively conducted, as determined by the Hangzhou Leadership Team.

8.4 Disciplinary Action & Other Consequences

Students who engage in conduct that is inappropriate, harmful, potentially harmful or in any other way incompatible will be subject to sanctions as outlined in the respective campus's Student Handbook. Subject to law and the circumstances, CIS may be required to inform the police or other authorities of Hong Kong, Hangzhou, or other relevant jurisdictions.

9. Additional Child Protection and Safeguarding Measures

9.1 Safe Touch Policy

CIS recognizes that within an educational and developmental context, brief and appropriate physical contact can play a role in supporting a student's emotional well-being, celebrating achievements, or providing necessary instruction and safety. However, to maintain the highest standards of professional conduct and to safeguard both students and staff, the school operates under a strict safe touch framework. This framework establishes clear boundaries and parameters for all physical interactions, ensuring that any contact is always student-centered, age-appropriate, transparent, and respectful of personal space and cultural sensitivities. Our primary objective is to cultivate an environment where students feel safe and empowered, and where professional boundaries are unequivocally understood by all members of the school community. For a comprehensive breakdown of specific guidelines, prohibited behaviors, and situational protocols, the full Safe Touch Policy is provided in Appendix C.

9.2 Physical Restraint Policy

In accordance with international safeguarding best practices, CIS maintains a strict policy regarding the use of physical restraint. CIS's approach emphasizes de-escalation and preventative strategies to manage challenging behavior; however, recognizes that in exceptional circumstances, physical intervention may be necessary to prevent a student from harming themselves or others. Any such intervention is governed by principles of necessity, proportionality, and the preservation of student dignity. The comprehensive Physical Restraint Policy, including specific protocols, documentation requirements, and staff training standards, can be found in full in Appendix D.

9.3 Self-Harm and Suicidal Ideation School Protocols

CIS is deeply committed to student well-being and maintains a supportive framework for those navigating challenges related to self-harm or suicidal ideation. Recognizing that students at different developmental stages and in different environmental contexts require unique approaches, CIS's protocols are specifically tailored to meet the individual needs of each student. Consequently, while the foundational commitment to safety is universal, specific policies and procedural steps may differ slightly between the Primary and Secondary school. Furthermore, protocols for the Hangzhou Campus are distinctively adapted to address the specific requirements of its residential program.

When a student demonstrates a need for urgent mental health support, CIS counselors will use screener assessments to determine the best level of support needed. In situations where a student's safety poses a medium or high risk concern, CIS will prioritize protection by working closely with parents and the Child Protection Officer. If a student requires personal leave to focus on their health, a collaborative re-entry process is followed to facilitate a safe and successful return. This process involves receiving clearance from a licensed clinical professional

and a mutual exchange of information between CIS and the family's healthcare providers. The goal is to create a seamless transition back to campus life through a personalized support plan, ensuring that every student feels safe, valued, and empowered to succeed within their specific school environment.

Unlike the Hong Kong Campus, where a student experiencing acute suicidal ideation or severe self-harm can be immediately transitioned into the direct custody of their parents, the Hangzhou Campus must act until guardians can pick up their child. In the event of an acute psychiatric or medical crisis, the Hangzhou nurse team and members of the Leadership Team will assume immediate responsibility, providing continuous, 24/7 supervision to ensure the high-risk student remains safe and supported while awaiting parental arrival. During these critical windows, the school will maintain constant communication and work closely with the family to coordinate emergency transportation logistics, facilitate access to pre-vetted bilingual medical or psychiatric facilities, and ensure the student receives the highest standard of stabilizing clinical care until their parents arrive on site.

9.4 Risk Assessment and Mitigation

CIS is committed to ensuring the highest safety standards for all off-site excursions and school-sanctioned events through a rigorous and proactive risk assessment process. Prior to the commencement of any trip or activity, a comprehensive risk assessment must be conducted to identify potential hazards and evaluate the safety of the environment. In instances where risks are identified, specific and robust mitigation measures must be documented and implemented to minimize potential harm. The school maintains a clear threshold for safety: if the proposed mitigation strategies cannot sufficiently outweigh or manage the identified risks, the trip or event will not be approved. To ensure institutional oversight and accountability, all risk assessments undergo a formal review process and must receive final approval from the CIS Leadership Team before any activity may proceed.

In addition to activity-specific assessments, the school maintains a dedicated Risk Mitigation Working Group responsible for the ongoing identification and evaluation of strategic, operational, and safeguarding risks facing the CIS community. This group contains members from both the Hong Kong and Hangzhou Campuses, and meets on a regular basis to monitor the evolving risk landscape and ensure that institutional mitigation strategies remain robust and effective. To maintain the highest level of governance and accountability, the Risk Mitigation Working Group formalizes its findings and progress in a comprehensive report submitted to the Board of Governors on a quarterly basis throughout the academic year.

9.5 Social Media, Chat Group, and Digital Expectations

- **9.5.1 Staff & Volunteers**

  To maintain transparent professional boundaries and ensure the digital safety of our students, all interactions between staff and students must be conducted exclusively through school-sanctioned platforms, such as GChat, Schoology, or official school email. Under no circumstances should individual communication occur between a student and a staff member on private or non-sanctioned channels; similarly, students are not permitted to contact staff individually outside of these official platforms. For any school-related digital groups, such as those established for field trips, sports teams, or extracurricular activities, a minimum of two CIS staff members must be included at all times to provide necessary oversight and accountability. To ensure the integrity of these professional boundaries, CIS reserves the right to monitor activity on school platforms and inspect school-issued devices at any time. This oversight is conducted in accordance with the Technology Responsible Use Agreement, which all staff members are required to review and sign on an annual basis.

- **9.5.2 Students**

  CIS is committed to maintaining a safe, respectful, and inclusive community, both on and off campus. Students are reminded that their digital footprint and online interactions are subject to the school's behavioral expectations. CIS reserves the right to investigate reports of misconduct—including bullying, harassment, or inappropriate social media posts—even if the activity occurs outside of school hours or on non-school platforms. Such investigations may be initiated if the behavior is deemed to impact the learning environment, affect the well-being of any member of the community, or pose a potential safeguarding risk.

  Furthermore, CIS maintains the right to monitor and investigate any chats, comments, or content shared on school-sanctioned digital platforms, such as GChat, Schoology, or official email. Students are expected to uphold the values of the school in all digital spheres, understanding that their online conduct has real-world implications for their standing within the CIS community. Further details regarding these expectations can be found in the respective campuses Student Handbook, specifically within the Technology Responsible Use Agreement, which all students are required to review and sign on an annual basis.

  To further protect student well-being and mitigate risks associated with late-night digital abuse, cyberbullying, and extortion, Hangzhou enforces a mandatory tech-curfew. All student smartphones, laptops, and internet-enabled devices must be placed in a designated Tech Box at the specified time, where they will be checked in by a staff member and stored securely overnight.

- **9.5.3 Parents**

  To uphold the highest safeguarding standards, CIS parents are asked to observe the school's protocols when participating in endorsed class or house chat groups. When sharing media, please post only group photos rather than individual close-ups, and ensure that no student is identified by name. Photos shared within these private groups are intended for internal community use and must not be further distributed on public social media platforms.

  CIS encourages all parents to be mindful and responsible digital citizens. While the school's official platforms may use first names or year levels to illustrate student learning, parents are urged to be vigilant regarding their own privacy settings and to avoid sharing personal details or images of other people's children.

  These guidelines apply equally to both the Hong Kong and Hangzhou campuses, though the school recognizes that communication platforms differ by location. Specifically, these protocols pertain to the use of WhatsApp at the Hong Kong Campus and WeChat at the Hangzhou Campus; a more detailed outline of requirements for each location is provided below.

  - Hong Kong WhatsApp Communication Guidelines
  - Hangzhou WeChat Communication Guidelines

9.6 Photography

CIS is committed to protecting the privacy and dignity of our students through strict protocols governing the capture and use of visual media. All photography and video recording on school premises or during school-sanctioned activities must serve a constructive, professional purpose, such as documenting student learning, celebrating school life, or supporting curriculum

objectives. Staff and community members are expected to ensure that all images present students in a respectful and appropriate manner, avoiding close-ups of individual students unless specific consent is granted for a designated school publication. To safeguard student identity, full names should not be attached to photographs in public-facing media.

Furthermore, any media captured by staff on personal devices during school trips or events must be transferred to secure school servers and permanently deleted from personal hardware within 24 hours. Visitors to our campuses must request permission from an adult staff member—not a student—before taking any photos or videos. Even when permission is granted, visitors must avoid close-ups or images that include student names and personal details. Visitors must refrain from posting these images on social media and delete them from all personal devices after their intended use.

These expectations, along with specific behavioral requirements, are formally outlined in the Staff, Volunteer, and Other Personnel and Visitor Code of Conducts, which all individuals must adhere to while engaged with the CIS community.

10. Reporting Standards and Procedures

10.1 Responsibility to Report

At CIS, child protection is a collective responsibility; therefore, all staff and community members are expected to report any concerns regarding a student's well-being, regardless of how minor they may initially appear. An isolated incident or observation may seem insignificant on its own, yet it can often represent a critical piece of a much larger, more serious pattern of concern. CIS staff and community members are not expected to investigate concerns independently or to make definitive judgments as to whether abuse has occurred. Rather, their professional obligation is to remain vigilant, identify potential indicators of harm as outlined in this policy, and promptly report any information that provides reasonable cause for concern.

10.2 Management of a Child Protection Concern

The management and resolution of child protection concerns at CIS are tailored to the specific needs and nuances of each individual case. To ensure a systematic and thorough response, the school adheres to a structured sequence of actions designed to prioritize the immediate safety of the student while fulfilling all legal and professional obligations. CIS's Child Protection Response Procedural Flowchart can be found in Appendix F, and the Key Child Protection Personnel Chart for both the Hong Kong and Hangzhou Campuses can be found in Appendix G.

- **10.2.1 Reporting Suspected Harm to a Student**

  Suspected concerns should be reported to one of CIS's Child Protection Officers immediately (identified in the Child Protection Response Flowchart in Appendix F and the Key Child Protection Personnel Chart in Appendix G). The person making the report will be asked to provide a written statement using CIS's Child Protection Reporting Form directly to the Whole School or Lead Child Protection Officer or one of the Lead Child Protection Officers in the respected division.

  Upon receiving the information, the Whole School or Lead Child Protection Officer will conduct an initial fact finding process and create a Child Protection Response Team to determine the course of action. Action plans may include monitoring, working with parents or guardians, referral and involvement from external agencies, and/or mandated reporting. Ongoing support for victims and those involved will be provided throughout the process,

and afterwards, as outlined in the action plan. Procedural Guidelines for Managing Suspected Abuse or Maltreatment Cases can be found in Appendix H, and Guidelines for Handling Abuse or Maltreatment Disclosures can be found in Appendix I.

- **10.2.2 Reporting Suspected Misconduct by a CIS Member of Staff**

  Allegations involving a staff member are treated with the utmost seriousness, as they may indicate a potential breach of the fundamental trust upon which the school community is built. A breach of trust occurs when the professional boundaries between a staff member and a student are compromised through inappropriate behavior or an abuse of power. It is important to note that such behavior does not necessarily need to be illegal to constitute a breach of trust; even in instances where a student may be above the legal age of consent, any conduct that violates professional standards or exploits the inherent power imbalance of the teacher-student relationship will be subject to scrutiny. All such concerns are treated as allegations against staff and following the formal investigative procedures outlined in CIS's Managing Allegations Against a CIS Member of Staff Policy.

  If concerns involve a CIS staff member, volunteer, or anyone who was hired by CIS to work with students (including service vendors), the report should be made to key designated members of the CIS Leadership Team at the respective Hong Kong or Hangzhou Campuses. If a concern involves a member of the CIS Leadership Team at either the Hong Kong or Hangzhou Campus, the report should be made directly to the Head of School. If the concern involves the Head of School, the report should be made directly to the Chair or Vice Chair of the Board of Governors. The designated members for the above situations are listed in the Child Protection Response Flowchart in Appendix F and the Key Child Protection Personnel Chart in Appendix G.

- **10.2.3 Management of Low-Level Concerns**

  While the preceding section outlines the formal management of serious allegations against staff, this section delineates the responsibility of all CIS staff to report "low-level" concerns. Maintaining a safe culture requires the proactive identification of behaviors that, while not meeting the threshold of a significant allegation, may still deviate from our professional standards. The distinction between a low-level concern and a formal allegation is defined as follows:

Low Level Concern	Formal Allegation
Raised when an individual's conduct is inconsistent with the CIS Code of Conduct or professional expectations, yet does not meet the threshold for a formal allegation. This includes actions—whether occurring inside or outside of the workplace—that may be considered inappropriate or out of character, but are not deemed serious enough to warrant an immediate external referral.	Raised when a person's conduct suggests they may be unsuitable for the school environment. This includes situations where an individual has: • **Caused Harm:** Behaved in a way that has harmed, or may have harmed, a child. • **Criminal Conduct:** Possibly committed a criminal offense against or related to a child. • **Posed a Risk:** Acted toward students in a manner that indicates a potential risk to their safety. • **General Unsuitability:** Behaved in any way—either professionally or personally—that calls into question their fitness to work with children.

When a CIS staff or community member suspects a low-level concern, all concerns must be immediately reported (including self-reporting) to the same individuals who manage allegations. It is important to note that CIS staff and community members are not required to determine whether a concern meets the specific threshold of an allegation or remains a low-level matter. Once a report is submitted, CIS will assess the threshold and determine the appropriate course of action.

10.3 Disclosure Policy

CIS is committed to fostering a culture of transparency and safety where staff feel empowered to act in the best interests of students. Consequently, the school will take all reasonable steps to protect from victimization or retaliation any staff member who, in good faith, makes a report or participates in an investigation. CIS maintains a zero-tolerance policy toward any behavior that targets an individual for filing a report, intending to file a report, or serving as a witness in a safeguarding matter. Victimization in any form is considered a grave violation of our professional standards; such conduct will be subject to immediate disciplinary action and may result in the termination of employment.

To ensure maximum discretion and protect the reputations of all parties involved, all documentation regarding investigations into allegations against staff will be maintained exclusively in hard copy. These records are secured in a locked safe within the Head of School's office and will not be stored digitally or placed within an individual staff member's general personnel file. Further details can be found in CIS's Disclosure Policy.

10.4 Measures to Ensure Confidentiality

In all suspected child protection cases, CIS maintains the highest standards of confidentiality to protect the privacy and safety of those involved. Sensitive information is only with those directly involved in the safeguarding process who are essential to the protection and support of the student. Communication is strictly managed to ensure both institutional transparency and individual discretion.

To ensure data integrity and security, all records relating to suspected child abuse cases are maintained exclusively within CPOMS. Access to sensitive child protection files are strictly restricted to the Child Protection Officer, or to those deemed necessary for supporting the case. Under no circumstances are child protection records stored within a student's general academic or administrative file. In exceptional circumstances involving highly sensitive information or potential conflicts of interest, records may be held offline.

10.5 Communication and Coordination in Suspected Child Protection Cases

CIS liaises and operates as part of a broader, integrated safeguarding system that includes external authorities such as social services, healthcare providers, and law enforcement. This collaboration is built on professional trust and a shared understanding of each agency's specific role, while strictly adhering to the principles of confidentiality. CIS avoids institutional isolation by fostering open communication, particularly in cases that may span different sections of the school or involve transition between our Hong Kong and Hangzhou campuses.

In cases where child abuse or maltreatment is suspected, the standard protocol at CIS is to report the concern to the respective jurisdictional child protection department and/or the police. In Hong Kong, the specific department reported to is the Social Welfare Department, whereas in China it is the Ministry of Civil Affairs. Specifically, any concern that suggests a potential criminal offense has occurred must be reported to law enforcement immediately.

CIS recognizes, however, that professional judgment is required to ensure that reporting actions do not inadvertently compromise a child's well-being. In cases where a formal report to external authorities would not be in the student's best interest, the decision to withhold a referral requires approval from the Whole School Child Protection Officer and CIS Leadership Team. This discretion applies exclusively to cases involving non-serious harm. Where the threshold for serious harm has been met, or the child is in immediate danger, mandated reporting requirements apply and there are no exemptions to the reporting process. If there are any questions regarding the above process, please speak directly with the Whole School Child Protection Officer.

10.6 Consent to Disclose Information in Suspected Child Protection Cases

CIS is committed to working in partnership with families; therefore, wherever practicable, the school will seek consent from the student and/or their parents before disclosing concerns of maltreatment to external agencies, such as the Social Welfare Department, the Ministry of Civil Affairs, or the police. However, in accordance with the guidelines outlined by the Hong Kong Social Welfare Department, the China Ministry of Civil Affairs, along with the Mandatory Reporting of Child Abuse Ordinance, CIS reserves the right to report concerns without parental or student consent in specific circumstances where the safety of the child is at risk. Such instances include:

1. **Mandated Reporting Thresholds**: When the threshold of serious harm (current or imminent) has been met, necessitating a report under the mandated pathway.
2. **Safety and Obstruction**: When a parent, carer, or family member is the suspected source of abuse, and informing them may result in further harm to the child or the destruction of evidence.
3. **High-Risk Situations**: When a student or parent refuses consent, but the school's professional assessment indicates that the level of risk to the child remains unacceptably high.
4. **Lack of Protective Action**: When it is determined that the parents or carers are not acting protectively or in the best interests of the child's safety.

In all such cases, the school's primary obligation is to the protection and well-being of the student, ensuring that legal and ethical safeguarding duties are upheld.

11. Key Roles and Responsibilities

While all CIS staff and community members share a collective duty to remain vigilant and well-informed regarding the indicators of maltreatment, the school maintains a structured Child Protection Team to manage and oversee these critical processes. This section outlines the distinct responsibilities assigned to various key roles within the CIS community, ensuring that legal requirements, internal procedures, and reporting pathways are executed with precision and clarity. The list of current individuals in these roles can be found in the Key Child Protection Personnel Chart in Appendix G.

11.1 Board of Governors

The Board of Governors endorses this policy as an integral component of the comprehensive Policy Handbook and maintains ultimate oversight of the school's child protection programme. To ensure robust governance across all locations, the Board Chair and Vice Chair are specifically designated to lead oversight measures and serve as the primary points of contact for school leadership on safeguarding matters in both Hong Kong and Hangzhou. The Head of School

submits confidential Child Protection Reports to the Board on a termly basis to ensure high-level oversight and accountability. These reports are strictly limited to statistical data and strategic progress, including the number of cases, trend analysis, identified systemic risks, and safeguarding successes.

Furthermore, the Chair and Vice Chair act as the formal contact persons should any concerns arise involving the Head of School. In their individual capacities, all Board members are committed to upholding the highest standards of integrity by adhering to the Staff, Volunteer, and Other Personnel Code of Conduct across all CIS Campuses.

11.2 Senior Leadership Team

The Head of School, Deputy Head of School, Heads of Divisions, and Director/Deputy Director of Hangzhou serve as the primary architects and leaders of the school's Child Protection Program. Their mandate includes the strategic oversight of this policy and the formal appointment of the Child Protection Officers and the Child Protection Response Team. It is the responsibility of these members to ensure that all child protection procedures are executed with integrity, fairness, and a steadfast commitment to the best interests of students. This oversight ensures that all institutional actions remain in strict alignment with Hong Kong and China laws, the Social Welfare Department and Ministry of Civil Affairs guidelines, and the relevant legal jurisdictions of both the Hong Kong and Hangzhou Campuses.

11.3 Whole School Child Protection Officer & Child Protection Leads

The Whole School Child Protection Officer maintains strategic oversight of all safeguarding matters across both the Hong Kong and Hangzhou Campuses, ensuring a unified and consistent approach to student welfare. In addition to these foundational duties, the Whole School Child Protection Officer is responsible for the following core functions:

- **External Liaison**: Managing all formal communications and coordination with the Social Welfare Department, the Ministry of Civil Affairs, law enforcement, and other relevant regulatory authorities.
- **Legal Compliance and Jurisdictional Intelligence**: Maintaining an up-to-date and expert understanding of relevant legislation, statutory requirements, and legal developments regarding child protection, including monitoring changes in both Hong Kong and Hangzhou law.
- **Policy Implementation**: Overseeing the consistent application of this policy across all facets of school life.
- **Training and Development**: Ensuring that all stakeholders—including staff, volunteers, and leadership—receive regular, comprehensive training aligned with current safeguarding standards and that a training record log is maintained.
- **Records Management**: Maintaining the integrity and security of all confidential child protection records for CIS students across both the Hong Kong and Hangzhou Campuses.
- **Curriculum Development and Innovation:** Overseeing the comprehensive child protection curriculum to ensure its effective implementation and delivery across all year groups, ensuring that educational content evolves in response to emerging trends, digital shifts, and global developments in student safety.

Dedicated Child Protection Leads are also appointed for the Primary, Secondary, and Hangzhou sections. These leads serve as essential first-line responders for all reports regarding potential harm to a student and may act as coordinators for the Child Protection Response Team when required.

11.4 Additional Responders

In addition to the appointed Child Protection Officers, CIS utilizes a team of designated responders to ensure broad and immediate support across the community. This group includes all school counselors, alongside other qualified personnel designated to this role based on their expertise. These individuals function as critical first-line responders for any reports of harm or safeguarding concerns. When circumstances require a multi-disciplinary approach, they may also be called upon to serve as coordinators for the Child Protection Response Team.

11.5 Responders for Concerns Involving Staff Members

Specific members of the CIS Senior Leadership Team are designated to manage concerns that involve a potential breach of professional standards by a staff member. As first-line responders for staff-related allegations, these individuals are responsible for receiving reports, initiating the appropriate internal protocols, and ensuring that the inquiry is handled with the necessary impartiality and rigor. To protect the integrity of the process and the privacy of all parties involved, these responders are also tasked with maintaining strictly confidential child protection records specifically related to staff cases, ensuring they remain separate from general personnel or student files.

11.6 Child Protection Response Team

The Child Protection Response Team is convened to manage the school's immediate and long-term reaction to specific safeguarding concerns. This multidisciplinary group is assembled on a case-by-case basis, with its composition carefully selected to meet the unique requirements and complexities of each individual situation. The team is responsible for coordinating the initial fact-finding process to ensure that all relevant information is gathered accurately and efficiently.

Beyond the initial response, the team provides essential oversight for all follow-up actions, ensuring that ongoing support and resources are tailored to the needs of the students, families, or staff members involved. Central to the team's operation is a strict adherence to privacy; all members are selected with the explicit understanding that absolute confidentiality must be maintained throughout the duration of the case and thereafter.

11.7 Child Protection Committee

The Child Protection Committee is a multidisciplinary body of staff members representing all divisions and key functional areas of the school. This committee meets on a regular basis to provide rigorous oversight of the school's Child Protection Program, ensuring that all practices remain in full compliance with CIS policy and align with evolving global best practices. Beyond regular monitoring, the committee is responsible for the annual review and refinement of this policy and the associated Codes of Conduct, overseeing the child protection action plan, and implementing necessary modifications to ensure the school's safeguarding framework remains robust, proactive, and responsive to the needs of the community.

Appendix A Signs of Potential Child Abuse and Maltreatment

It should be noted that any of one or a combination of these indicators may not itself constitute proof of child abuse or maltreatment. Children may not show any signs or symptoms, yet still be experiencing harm. Some of the indicators may also be signs of problems other than abuse and maltreatment, and the advice of Child Protection Officers, counselors, and other trained professionals will be drawn upon, as appropriate, in those cases. However, these indicators can be used as a baseline to alert us to the possibility of abuse and maltreatment.

Neglect	
Physical Indicators	• Abandonment • Unattended medical needs • Consistent lack of supervision • Consistent hunger, inappropriate dress, poor hygiene • Lice, distended stomach, emaciated • Significant weight change. • Inadequate nutrition
Behavioral Indicators	• Regularly displays fatigue or listlessness, falls asleep in class • Shows signs of developmental delay or regression • Steals food, begs from classmates • Reports that no caretaker is at home • Frequently absent or tardy • Self destructive • School dropout (adolescents) • Extreme loneliness and need for affection • Getting involved in criminal or sexual activities due to inadequate supervision
Environmental Indicators	• Leaving an infant or preschool child unattended or a child being unsupervised for an extended period of time • Leaving a child in the care of an inappropriate carer such as another young child • A school-aged child being consistently deprived of schooling and allowing a school-aged child to be consistently absent from school • Ignoring safety measures and exposing a child to dangerous items, household drugs or accidental injuries, exposing a child to a drug-taking environment where the child inhales dangerous drugs • Neglecting a child's basic needs as the carer being affected by substance abuse or mental health issues • The carer's behaviour and attitude is indifferent to the child's needs, neither talking to, playing with, nor communicating emotions with the child, failing to build attachment with the child
Hangzhou Specifics	In Hangzhou, the CPO/Counseling team will also actively monitor for signs of emotional abandonment (e.g., parents failing to contact students during designated times, refusing to fly in for emergencies, or neglecting to arrange proper guardianship during school breaks).

Physical Abuse	
Physical Indicators	• Unexplained bruises (in various stages of healing), welts, loop marks • Unexplained burns/scalds, especially cigarette burns or immersion

	burns • Unexplained fractures, lacerations or abrasions • Swollen lips/chipped teeth. • Evidence of delayed or inappropriate treatment for injuries • Adult/human bite marks • Bald spots or missing clumps of hair • Linear/parallel marks on cheeks and temple area. • Crescent-shaped bruising. • Puncture wounds. • Bruising behind the ears.
Behavioral Indicators	• Self-destructive/self-mutilation • Withdrawn and/or aggressive – behavioral extremes • Arrives at school early or stays late as if afraid to be at home • Chronic runaway (adolescents) • Complains of soreness or moves uncomfortably • Wears clothing inappropriate to weather, to cover body • Bizarre explanation of injuries • Wary of adult contact • Uncomfortable/skittish with physical contact. • Lack of impulse control (e.g. inappropriate outbursts).

Emotional / Psychological Abuse	
Physical Indicators	• Speech disorders • Delayed physical development • Substance abuse • Ulcers, asthma, severe allergies
Behavioral Indicators	• Habit disorder (sucking, rocking, biting) • Antisocial, resistance to contact with others and the outside world • Neurotic traits (sleep disorders, inhibition of play) • Passive and aggressive – behavioral extremes • Delinquent behavior (especially adolescents) • Exhibits developmental delay or regression • Lacking self-confidence or having low self-esteem • Having difficulty building trust with others • Displaying signs of anxiety or depressed mood • Exhibiting self-harm or suicidal thoughts or attempts
Environmental Indicators	• Carer may be unresponsive to the child emotionally or give inappropriate responses • Carer is detached or indifferent to the child • Carer uses name-calling, put-downs, etc. or may be terrorizing, isolating, humiliating, rejecting, corrupting, or ignoring • Carer is exposing the child to horrific or violent situations, uses violence in on family members in front of the child • Carer unreasonably restraining the child from normal social life

Sexual Abuse	
Physical Indicators	• Sexual abuse may be non-touching (obscene language, pornography exposure) or touching (fondling, molesting, oral sex, intercourse) • Torn, stained or bloody underclothing • Pain, swelling or itching in genital area • Bruises or bleeding in genital area

	• Difficulty walking or sitting • Venereal or sexually transmitted diseases • Frequent urinary or yeast infections • Massive weight change • Pregnancy under 12 years of age
Behavioral Indicators	• Excessive seductiveness • Role reversal, overly concerned for siblings • Massive weight change • Withdrawal, chronic depression. • Suicide attempts (especially adolescents) • Seductive or promiscuous behavior • Sexual behaviors or references that are unusual for the child's age. • Threatened by physical contact, closeness • Poor self-esteem, self-devaluation, lack of confidence • Hysteria, lack of emotional control
It should be noted that some victims of sexual abuse, through a process of manipulation, whether in person or online, etc., which is referred to as “grooming”, are taught that sex is a form of love, and so tend to love their offender and may present as happy and well-adjusted children without negative symptoms because of their perception of being loved.	

Digital Abuse and Extortion	
Physical Indicators	• Insomnia, nightmares, or significant changes in eating habits. • Unexplained headaches, dizziness, or stomach aches. • Self-harming (fresh cuts, scratches, bite marks, or bruises in patterns) • Sudden mood changes, depression, or increased irritability
Behavioral Indicators	• Hiding screens when others approach or rapidly switching apps when an adult approaches. • Becoming agitated, anxious, or fearful if a phone is picked up or used by someone else • Withdrawing from friends, family, or social media, or losing interest in activities previously enjoyed. • Spending extreme amounts of time online (even late at night) or appearing constantly panicked, anxious, and checking for messages. • Sudden lack of funds, or unexplained, repeated requests for money (common in blackmail scenarios). • Talking about a new, unknown online "friend" or influencer they are fearful of or strangely infatuated with. • Being followed by anonymous accounts, receiving anonymous gifts, or appearing suddenly at locations

Appendix B Child-On-Child Abuse Policy

Purpose and Aim

Child-on-child abuse occurs when a child is harmed, exploited, or bullied by another child or group of children. CIS maintains a zero-tolerance approach to such behavior, recognizing that abuse perpetrated by a peer can be just as damaging as that committed by an adult. The Child-On-Child Abuse Policy focuses specifically on inappropriate or harmful behaviours between students of any age. This policy outlines a planned and supportive response to prevent, mitigate and handle any such issues, and follows the CIS Child Protection Policy's definition of a child:

> *"While a child is normally understood to be a person below the age of 18, CIS maintains a comprehensive duty of care for all enrolled students, including those who have reached or exceeded the age of 18".*

Furthermore, it is also critical to acknowledge how inequality and discrimination can exacerbate the risk of child-on-child abuse. Socio-economic disparities often drive increased rates of bullying, while racial and ethnic minority status remains a significant risk factor for peer victimization. Similarly, LGBTQ+ students may be at an elevated risk of experiencing abusive peer behavior, making it essential for staff to remain sensitive to the unique vulnerabilities created by these intersecting identities.

Responsibility to Report

The standard for addressing inappropriate behavior between students mirrors the fundamental safeguarding expectations of the school: all staff are required to raise concerns, regardless of how minor they may appear. An isolated incident may seem insignificant on its own, but when synthesized with broader information held by counselors, Child Protection Officers, leadership team members, it may reveal a more serious pattern of harm.

Staff members are not required to determine whether bullying or abuse has occurred; rather, their professional obligation is to report any identified indicators of harm or general cause for concern. It is critical that staff do not dismiss abusive behaviors as typical "growing pains" or "normal" peer interactions. CIS maintains a proactive approach to safeguarding where staff avoid developing high thresholds for intervention. Furthermore, all staff must stay vigilant regarding the use of information technology as a medium for bullying or digital abuse between students.

Innappropriate Behavior, Bullying, and Child-On-Child Abuse

There are many ways that children may act inappropriately to each other, and the vast majority of such behaviours are unlikely to rise to the level of bullying or child-on-child abuse. CIS uses the following definition for inappropriate behavior, bullying, and abuse, as outlined in the CIS Student Handbook and the CIS Child Protection Policy.

Inappropriate Behavior	• Actions that deviate from the school's Code of Conduct or expectations but may not yet reach the threshold of bullying or abuse. This includes conduct that is disrespectful, exclusionary, or socially unacceptable within a school environment. At CIS, we treat these incidents seriously, as minor boundary-crossing or low-level behaviors can often escalate if left unaddressed.

Bullying	• Bullying, including cyberbullying, is the misuse of power, position and privilege. It is done to hurt, intimidate, coerce, frighten and to control.
Abuse	• Any act of commission or omission that endangers or impairs the physical/psychological health and development of an individual under the age of 18 committed by individuals, singly or collectively, who, by their characteristics (e.g., age, status, knowledge, organizational form), are in a position of differential power that renders a child vulnerable.

While the differences between inappropriate behaviour, bullying and child-on-child abuse will generally relate to the persistence of the behaviour and severity of harm, there are no absolute guidelines to determine at what point behavior between peers has escalated to the point of bullying or the level of abuse.

Online Bullying and Online Child-On-Child Abuse

Online bullying (or cyberbullying) is the use of technology (social networking, messaging, text messages, e-mail, chat rooms etc.) to harass, threaten or intimidate someone. Online bullying can include a wide range of harmful digital behaviors, including sending abusive texts, posting social media insults, sharing humiliating media, and spreading rumors or "trolling" through gaming and chat networks. It can also involve identity theft, anonymous harassment, and orchestrated group exclusion. Most severely, cyberbullying includes extreme behaviors such as creating hate sites or encouraging self-harm.

Whereas online child-on-child abuse is any form of abuse where an element might be facilitated through the use of digital technology. Online child-on-child abuse can include consensual and nonconsensual sharing of nude and semi-nude images and/or videos (sometimes called ‘sexting’), online abuse, coercion and exploitation, child-on-child grooming, threatening and hate speech delivered via online means, the distribution of sexualised content (which might be youth-produced, commercial pornography or pseudo sexual images), and harassment.

Potential Indicators of Child-On-Child Abuse

Child-on-child abuse issues may be disguised or may take place alongside behaviors that on their own are not typically characterised as abuse. It is important that inappropriate behaviours not be tolerated or dismissed as childish banter, initiation or hazing-type rituals, or seen as a part of growing up. Any of the following behaviors should always be reported.

1. **Bullying and Discriminatory Conduct**
    - **Bullying:** Including cyberbullying, prejudice-based, and discriminatory bullying.
    - **Hate Incidents and Crimes:** Actions motivated by hostility toward a protected group, including online harassment.
    - **Racism:** Treating an individual less favorably due to skin color, nationality, ethnicity, cultural identity, or socio-economic status. This includes:
        - Verbal and physical abuse.
        - Exclusion from activities or opportunities.
        - Microaggressions: Conscious or unconscious subtle slights.
    - **Initiation and Hazing:** Harassment, abuse, or humiliation used as a ritual for group entry.

2. **Physical and Relationship Abuse**
    - **Physical Abuse:** Actions such as hitting, kicking, shaking, biting, or hair pulling. This includes online elements that threaten or encourage physical violence.
    - **Intimate Relationship Abuse:** Abuse occurring within teenage personal relationships, often involving digital monitoring or coercion.

3. **Harmful Sexual Behavior (HSB) -** HSB refers to developmentally inappropriate sexual behavior that is harmful or abusive. It can occur face-to-face, online, or simultaneously across both.
    - **Sexual Violence:** Including rape, assault by penetration, or sexual assault. This encompasses forcing an individual into sexual activity without consent (e.g., forcing someone to strip or touch themselves).
    - **Sexual Harassment:** Unwanted conduct of a sexual nature, including:
        - Verbal: Sexual comments, lewd remarks about appearance, sexualized names, and spreading sexual rumors.
        - Non-Verbal: Suggestive looks, leering, sexual gestures, or displaying sexual images.
        - Physical: Deliberately brushing against someone or interfering with clothing (which may escalate to sexual violence).
    - **Upskirting:** The criminal offense of taking a picture under a person's clothing without permission to obtain sexual gratification or cause humiliation.
    - **Online Sexual Harassment:** Standalone digital harassment or harassment that forms part of a wider pattern of sexual violence.

Reporting a Concern

As set up in CIS's Child Protection Policy, if a member of staff has reasonable cause to believe that a child's behavior is abusive or potentially abusive, a report should be made immediately to one of the school's Child Protection Officers, with a handwritten statement using the Child Protection Reporting Form.

If a member of staff does not believe the behavior is abusive or potentially abusive, or is unsure, the behavior should be reported within 24 hours to one of the following persons:

Hong Kong Campus

- Primary Section - Child Protection Officer, Counselor, Head of Year, or Head of Student Life & Administrative Services
- Secondary Section - Child Protection Officer, Counselor, Head of Year, Director of Student Life

Hangzhou Campus

- Child Protection Officer (Deputy Director), Counselor, Deputy Child Protection Officer

The list of individuals currently in the above roles are outlined in the Key Child Protection Personnel Chart in Appendix G.

Responding to Child-On-Child Abuse

CIS maintains a zero-tolerance policy toward any behavior that adversely impacts a student's sense of safety or well-being, but also has an equal duty of care towards the students (s) who have/harmed and the student(s) who have/have been harmed. All concerns and allegations of child-on-child abuse are handled with the utmost sensitivity, professionalism, and urgency. Our institutional response includes:

1. **Holistic Assessment**: Every allegation is met with a thorough assessment of the incident and the wider context in which it occurred. We recognize that harmful behavior between peers may indicate deeper, underlying safeguarding concerns for any of the students involved. In determining the response to child-on-child abuse, CIS conduct an assessment of the incident to consider the following:
    - Chronological and developmental ages of everyone involved
    - The difference in their power or authority in relation to age, race, gender, physical, emotional or intellectual vulnerability
    - All alleged physical and verbal aspects of the behaviour and incident
    - Whether the behaviour involved inappropriate sexual knowledge or motivation
    - What was the degree of physical aggression, intimidation, threatening behaviour or bribery
    - The effect on the victim
    - Any attempts to ensure the behaviour and incident is kept a secret
    - The child or young person's motivation or reason for the behaviour, if they admit that it occurred
    - Whether this was a one-off incident or longer in duration
2. **Student-Centered Approach**: The perspectives and experiences of the affected students are central to the process. CIS manages expectations regarding information sharing transparently, ensuring that both students and their parents are kept informed of developments, provided it is safe and appropriate to do so.
3. **Individualized Resolution**: Each case is evaluated on its own merits to ensure that the unique needs and best interests of every student are prioritized.

Depending on the outcome of the above responses, the case may be elevated to a child protection manner. If so, subsequent actions and procedures will then follow the Procedural Guidelines for Managing Suspected Abuse or Maltreatment Cases which is found in Appendix H.

Reporting to External Agencies

When an incident is disclosed, CIS first assesses whether the facts, if proven, would constitute a criminal offense under the laws of the relevant jurisdiction. If a potential offense is identified, the school typically follows the Hong Kong Social Welfare Department, the China Ministry of Civil Affairs, and jurisdictional Education Bureau (EDB) guidelines to report the matter to the police. However, if CIS determines that strictly following these guidelines would not serve the best interests of the students involved, they may choose to deviate from standard procedures.

The school also evaluates whether a concern requires the involvement of external agencies or if the situation can be managed effectively through internal CIS support structures. This assessment is dependent on whether the school can independently guarantee student safety and whether external intervention is necessary to provide the appropriate level of care. Generally, any behavior that is deemed inappropriate but does not constitute a legal offense or a critical safety risk is managed internally by the Child Protection Response Team, ensuring that interventions remain proportional to the incident.

Finally, in accordance with the EDB School Administration Guide, CIS will notify the Regional Education Offices of the EDB regarding serious safeguarding incidents. This reporting is mandatory for cases of a severe nature, such as those involving brutal violence, serious injury, or allegations where a staff member is the aggressor.

Appendix C Safe Touch Policy

Purpose and Aim

This policy functions in conjunction with the Child Protection and Behavior Policies, which prioritize student safety above all else. Its primary objective is to define clear professional boundaries for physical contact, ensuring that CIS staff and community members can manage necessary interactions safely while protecting both students and themselves from allegations of misconduct.

Under this framework, "safe touch" is defined as physical contact that is deemed necessary for the student's well-being; specifically, contact that, if withheld, would be considered inhumane, unkind, or potentially damaging to the student's emotional or physical health.

The fundamental principle of this policy is that physical contact must always be aligned with a community member's professional role and initiated only after the student has granted permission. Consent and professional necessity are the cornerstones of all physical interactions. The only exceptions to this principle occur in extreme circumstances, specifically during the management of a student's challenging behavior where there is an immediate risk of harm. In such instances, our actions must be guided by the CIS Physical Restraint Policy. Physical restraint is classified as a serious intervention and is strictly reserved as a measure of last resort. For comprehensive guidance on CIS's Physical Restraint Policy, please refer to Appendix D.

Purpose for Touch

Safe touch is an essential part of human relationships and contributes positively to brain development, emotional regulation, mental health and the development of social skills. As such, CIS recognizes that safe touch supports the growth and emotional well-being of our students, is beneficial for both psychological and physiological development, and is essential to provide sensitive, high-quality care.
CIS also recognises that touch may be necessary in order to promote the feeling of safety, security and well-being, or to provide effective instruction in some curricular areas. To this end, CIS staff may use safe touch when it is undertaken within a framework which is understood by all, and protects everyone's interests.

Given this, touch may be used routinely in the school environment for any of the following reasons:

1. **Communication** - touch may be necessary as the main form of communication e.g. to guide students between activities or locations, or to reinforce other communication e.g. to gain or maintain attention.
2. **Emotional Support** - touch may be necessary to communicate warmth, security and comfort or to provide reassurance.
3. **Instruction** - touch may be necessary to direct students in educational and/or sporting tasks and essential skills e.g. support in PE, Swimming, Music or Performing Arts.
4. **Intimate Care** - touch may be necessary to carry out and/or support personal care for those who need it e.g. help with changing or toileting in an Early Years setting. (In using touch during intimate care routines staff should ensure students are comfortable and familiar with the staff members delivering the intimate care.)
5. **Medical Care** - touch may be necessary to administer first aid or medical attention.
6. **Play** - touch is a necessary part of many play activities.

7. **Social Connection** - touch may be necessary to make social connections with another e.g. handshakes, placing hand on shoulder/arm.
8. **Protection** - touch may be necessary to maintain good order, protect students from significant harm, to self or others, and to avoid damage to property.

General Guidance for Safe Touch

Safe Touch Should ALWAYS...	• Be carefully considered • Remain impersonal so there is no risk of it being misinterpreted or misconstrued • Take place within clear sight of other persons • Be in a manner that ensures the staff member's hands can be seen by observers • Take place only with the student's informed consent, with the staff member explaining the reason for and the nature of the proposed physical contact and obtaining explicit permission from the student before proceeding • Be appropriate and consistent with the developmental age of the individual student • Be in a manner that maintains the student's dignity and respect. • Avoid the area of the body normally covered by a bathing suit unless absolutely necessary
Safe Touch Should NEVER Include... *Exceptions to this list occur if the activity taking place requires physical contact (as outlined in the section Activities and Roles that May Require Physical Contact below).*	• Touching a part of a child's body that is normally covered by a bathing suit • If touch in such an area is required e.g. in a medical emergency or for first aid, another responsible adult must be present and consent gained from the student involved, and, where possible, from their parent or carer • Allowing a student to sit on their lap • Allowing a student to stand between their legs when seated • Holding a student's hand • Engaging in contact that is prolonged • Hugs of any kind must be kept to a minimum, from a sideways position (with hands placed on the student's shoulders), and short in duration • Tickling, kissing, fondling or engaging in 'play fighting' or 'horseplay' with students • Engaging in touch that is humiliating or flirtatious • Permitting or encouraging a student's display of overly familiar affection • If this occurs, one must withdraw themselves immediately from the situation. • If the student appears in any way aroused by the physical contact or displays emotional/physical agitation, staff should report the matter directly, in accordance with the CIS Child Protection Reporting Guidelines. • Ignoring signals that a student dislikes touch e.g. pulling away or grimacing • If a student indicates in any way that they dislike touch, one must retract immediately

Activities and Roles that May Require Physical Contact

Teaching in areas such as swimming, PE, early years, drama, art, music or activities such as sports coaching and outdoor activities may require physical contact with students. Teaching very young children may also require physical contact with students. Physical contact should

always be carried out in accordance with the general rules and guidelines for safe touch contained within this policy and more specifically within the rules and guidelines set out below.

PE/Swimming Teachers, Coaches, Lifeguards and CCA Staff

The teaching of PE/swimming, as well as coaches and staff members of various CCAs, at times require physical contact between a staff member and student. Physical contact with students should be avoided unless it is:

- **Spotting and Injury Prevention:** Providing physical support during gymnastics, trampolining, or high-impact athletics to prevent falls or ensure a safe landing.
- **Technical Adjustment and Body Mechanics:** Guiding a student's limb or torso to ensure correct form in activities like golf, racket sports, or weight training, specifically to prevent long-term physical strain.
- **Aquatic Safety and Stroke Correction (Swimming):** Using physical contact to support a non-swimmer's buoyancy or to manually adjust a student's arm or leg position to improve stroke efficiency and water safety.
- **Administering First Aid:** Providing necessary physical care in the event of an injury, such as stabilizing a limb, applying ice, or assisting a student off the field of play.
- **Life-Saving Interventions:** Immediate physical contact required to rescue a student in distress in the pool or during high-risk outdoor activities.
- **Encouragement and Sportsmanship:** Standardized, public gestures of support such as a "high-five" or a fist-bump to celebrate effort or reinforce team cohesion.

Early Years Teachers and Teaching Assistants

The teaching of very young children, aged 4-7 years, may at times require physical contact between a staff member and a student. In this setting staff may:

- Allow students to sit on their lap if they require comfort or reassurance, particularly in the case of distress, but this type of contact is only made if it is necessary and with the consent of the child.
- Allow students to hold their hand when giving guidance, reassurance or to comfort them. This is done by the adult holding their arm out, and the child being encouraged to either hold the hand or arm of the adult or to wrap their hand around the adult's lower arm.
- When the nurse is unavailable, and where necessary, provide support with intimate care (such as changing or toileting) for students. In these circumstances a second adult must be present and the student's consent sought. Parent/carer consent is obtained at the beginning of each school year.

Drama and Music Teachers

In the creative arts, physical contact is often necessary for technical instruction, safety, and performance. Within the Safe Touch Framework, music, drama, and art teachers may use touch in the following professional contexts, provided they prioritize student consent and transparency.

- **Instrumental Technique and Posture (Music):** Adjusting a student's hand position, finger placement, or embouchure to prevent repetitive strain injuries or to ensure correct technical execution.
- **Breath Support and Alignment (Music & Drama):** Providing a light touch to the upper back or shoulders to help a student identify correct postural alignment or to feel the expansion of the ribcage during vocal exercises.
- **Physical Theatre and Choreography (Drama):** Guiding a student's movement during

blocking, stage combat (under strict supervision), or dance sequences to ensure safety and correct spatial awareness.

- **Safety and Tool Mastery (Art):** Assisting a student's hand-over-hand movement when teaching the safe use of specialized equipment, such as sharp carving tools, heavy machinery, or delicate pottery wheels, where verbal instruction alone may be insufficient to prevent injury.
- **Costume and Mic Fitting (Drama & Music):** Assisting with the professional fitting of costumes or the placement of lapel microphones, ensuring these interactions are conducted in the presence of another adult or in an open, transparent environment.
- **Emotional Support and Celebration**: A brief, culturally appropriate gesture—such as a "high-five" or a pat on the shoulder—to acknowledge a successful performance, a creative breakthrough, or to provide reassurance during a high-pressure assessment

School Nurses

- School nurses should comply with the Framework for School Nursing Practice: Standards of Practice (revised February 2022).

Certified Athletic Trainer

ATC will always abide by the National Athletic Trainers' Association Code of Ethics (revised May 2022).

Heads of House and Coach Mentors in Hangzhou

Within residential and boarding life, physical contact is often necessary for maintaining a safe, structured, and supportive home-like environment. Within the Safe Touch Framework, heads of house and coach mentors may use touch in the following professional contexts, provided they prioritize student consent, privacy, and transparency.

Emergency Interventions and Crisis Safety: Restraining or physically moving a student to prevent imminent self-harm, injury from a hazard (such as a fire or structural emergency), or to break up a physical altercation between residents.

Standard First Aid and Health Monitoring: Providing necessary physical care in the event of an illness or injury sustained within the dorm, such as taking a temperature, stabilizing a limb, applying ice, or assisting an incapacitated student to the school clinic.

Age-Appropriate Reassurance and Homesickness Support: Providing brief, culturally appropriate physical comfort—such as a side-hug, a pat on the shoulder, or holding a hand—to a student experiencing acute emotional distress, severe homesickness, or grief. This contact must be explicitly welcomed by the student and occur in an open, communal area.

Boundary Management and Welfare Checks (Awakening): Gently shaking a student's shoulder or arm to rouse them during morning roll-call, a fire drill, or a suspected medical emergency, only after persistent verbal prompts and knocking have failed.

Community Building and Milestones: Engaging in standardized, public gestures of celebration, welcome, or departure—such as a "high-five," fist-bump, handshake, or brief hug—to acknowledge major milestones like high school graduation, end-of-term departures, or birthday celebrations.

Changing Room Arrangements

Prior to lessons, parents must be informed of all changing room arrangements. To balance privacy with safety, staff supervise through proximity rather than direct presence, entering only in response to disturbances and after announcing their arrival to allow students to cover up. Only staff of the appropriate gender may enter, and the "never alone" rule is strictly enforced:

students should remain in groups, and staff must always work in pairs if a group setting is not possible.

Staffing plans must ensure appropriate ratios and gender-matching to maintain professional boundaries. Students are encouraged to change independently; however, if age or additional needs necessitate physical assistance, a second adult must be present, and prior consent from both the parent and student is required. Finally, to ensure total separation of adult and student spaces, staff are strictly prohibited from changing or showering in the same facilities as students.

Student to Student Interactions

For activities involving peer-on-peer physical contact—such as sports, drama performances, or outdoor expeditions—staff must proactively manage the environment to ensure safety and respect for personal boundaries. Before any such activity begins, staff are responsible for providing clear guidelines that define what constitutes appropriate contact, ensuring all interactions align with the school's Safe Touch Policy. It is a fundamental requirement that no student is ever forced or pressured into participating in an activity involving physical contact; participation must be voluntary, and staff must remain vigilant in monitoring for signs of discomfort. By establishing these expectations early and prioritizing student autonomy, CIS ensures that peer interactions remain collaborative, professional, and consistent with our overarching child protection standards.

CIS Staff Roles and Responsibilities

Maintaining a secure environment requires a shared commitment to professional boundaries and proactive safeguarding. The following outlines the specific roles and responsibilities of the CIS community, ensuring that all staff—from leadership to frontline educators—are equipped to uphold the highest standards of physical and emotional safety.

1. **Duty of Care:** All staff members bear a fundamental duty of care toward students, necessitating a constant and vigilant awareness of professional boundaries regarding physical contact.
2. **Training and Awareness:** Child Protection Officers are responsible for conducting regular training to ensure all staff understand their obligations under the Child Protection Policy. In coordination with the Leadership Team, Child Protection Officers ensure that the entire school community is well-versed in Safe Touch guidance.
3. **Student Safety:** Every staff member is responsible for ensuring that no student feels threatened or unsafe due to inappropriate touch. Any instance of concerning or inappropriate contact must be reported immediately to the Leadership Team or the Child Protection Officers.
4. **Communication and Transparency:** The Leadership Team or the Child Protection Officers oversee communication with parents and carers to ensure policy transparency.
5. **Institutional Culture:** CIS is dedicated to promoting an organizational culture that actively respects and prioritizes the wishes, feelings, and bodily autonomy of every student.

Staff members who are also parents have a dual role, which requires careful consideration in out-of-school interactions with students connected to their child. While personal relationships are normal, staff must prioritize student safety by adhering to safeguarding guidelines. This includes avoiding private, unsupervised settings with a student who is not your own child, maintaining transparency in interactions, and protecting student confidentiality. If a safeguarding concern arises during such interactions, the staff member should report it promptly through the school's Child Protection channels.

Reporting Inappropriate Touch

To ensure the highest standards of safety, any instance of inappropriate touch—whether initiated by a student, a staff member, or another adult—must be met with an immediate and formal response. If a student attempts to engage in inappropriate physical contact with a peer or an adult, or if a staff member suspects or witnesses such conduct involving any member of the school community, they are obligated to report the incident immediately. This reporting requirement applies to actions occurring both on and off school premises and must be conducted in strict accordance with the CIS Child Protection Reporting Guidelines.

Appendix D Physical Restraint Policy

This policy provides a framework for the use of physical restraint, which CIS recognizes as a serious intervention to be used only as a last resort. It is governed by the CIS Child Protection Policy and all relevant Hong Kong laws and regulations.

Guiding Principals

The school's approach to physical intervention is anchored in a commitment to student well-being and is governed by a set of core principles that prioritize de-escalation, legal compliance, and the preservation of student dignity.

1. **Exceptional Circumstances**: Physical intervention is only justified when a student presents a danger to themselves, others, or property.
2. **Threshold for Use**: Restraint shall only be used when there is an imminent risk of serious harm.
3. **Least Restrictive Measure**: Staff must always use the least restrictive intervention necessary to resolve a situation.
4. **Dignity and Support**: Interventions must ensure the safety and dignity of the student as part of a positive behavior support system prioritizing de-escalation.

Definition of Physical Restraint

To ensure clarity across the CIS community, the school utilizes a specific definition of physical restraint that distinguishes between the restrictive use of force and other forms of routine professional contact. Physical restraint is defined as the use of physical force to restrict a student's freedom of movement. Restraint does not include:

- Physical contact used to guide or assist a student.
- Physical contact provided for comfort or emotional support.
- Immediate physical contact to break up a fight or prevent an impulsive, dangerous act.

Permitted and Prohibited Practices

Staff are directed to follow strict parameters regarding when the use of reasonable force is authorized and which specific physical techniques are strictly forbidden under any circumstances.

Permitted Use of Reasonable Force	Strictly Prohibited Practices
Reasonable force may be used as a last resort when other management strategies fail. Specific circumstances include: • Preventing a student from attacking a member of staff or another student. • Intervening when a student is at serious risk of self-harm. • Removing disruptive students from a classroom after they have refused to leave. • Controlling disruptive students on school	The following practices are strictly prohibited: • Prone (face-down) or mechanical restraints. • Supine (face-up) restraint that restricts breathing. • Any restraint that restricts the student's ability to breathe or inflicts pain. • The use of restraint as a form of punishment or coercion.

trips to maintain safety. • Preventing a student from leaving a classroom if doing so leads to a safety risk. • Stopping a student from destroying property in a way that poses a risk of harm.	

Operational Procedures

When an incident necessitates physical intervention, staff must execute the following safety protocols and adhere to mandatory communication and immediate aftercare requirements.

During a Restraint Incident	When a restraint is necessary, staff must: • Use only the minimum amount of force required to ensure safety. • Explain to the student why the action is necessary. • Avoid injury to the student, acknowledging that in extreme cases of immediate intervention, this may not always be possible. • Ensure other staff members are present as witnesses whenever poss • Continuously monitor the student's physical and emotional state and release them as soon as the danger subsides.
Post-Restraint Procedures	Following an incident, the school will: • Ensure the immediate well-being of the student and staff. • Provide the student a safe environment to talk about the incident. • Notify parents or guardians as soon as reasonably practicable. • Conduct a debrief with involved staff to review the incident and iden improvements.

Documentation and Reporting

Following the use of physical restraint, a formal reporting process must be initiated to provide a transparent record of the incident and ensure comprehensive oversight by the Child Protection Officer. Records must include:

1. Date, time, location, and names of all students, staff, and witnesses involved.
2. A description of the behavior and the de-escalation techniques attempted prior to restraint.
3. The type and duration of the restraint used and any injuries sustained.
4. Confirmation of parent notification and follow-up actions taken.

Restraint cases are reviewed regularly to identify trends and inform school practice.

Training and Specialized Support

The school maintains a proactive safety culture through mandated staff qualifications and the development of individualized handling plans for students requiring specialized behavioral support.

- **Staff Training**: Key staff receive specific qualifications in physical restraint, while all staff

receive training on de-escalation, legal requirements, and recognizing signs of distress. Refresher training is provided regularly.

- **Positive Handling Plans**: For students with specific needs or consistently challenging behavior, a positive handling plan must be drawn up and agreed upon by all involved parties.

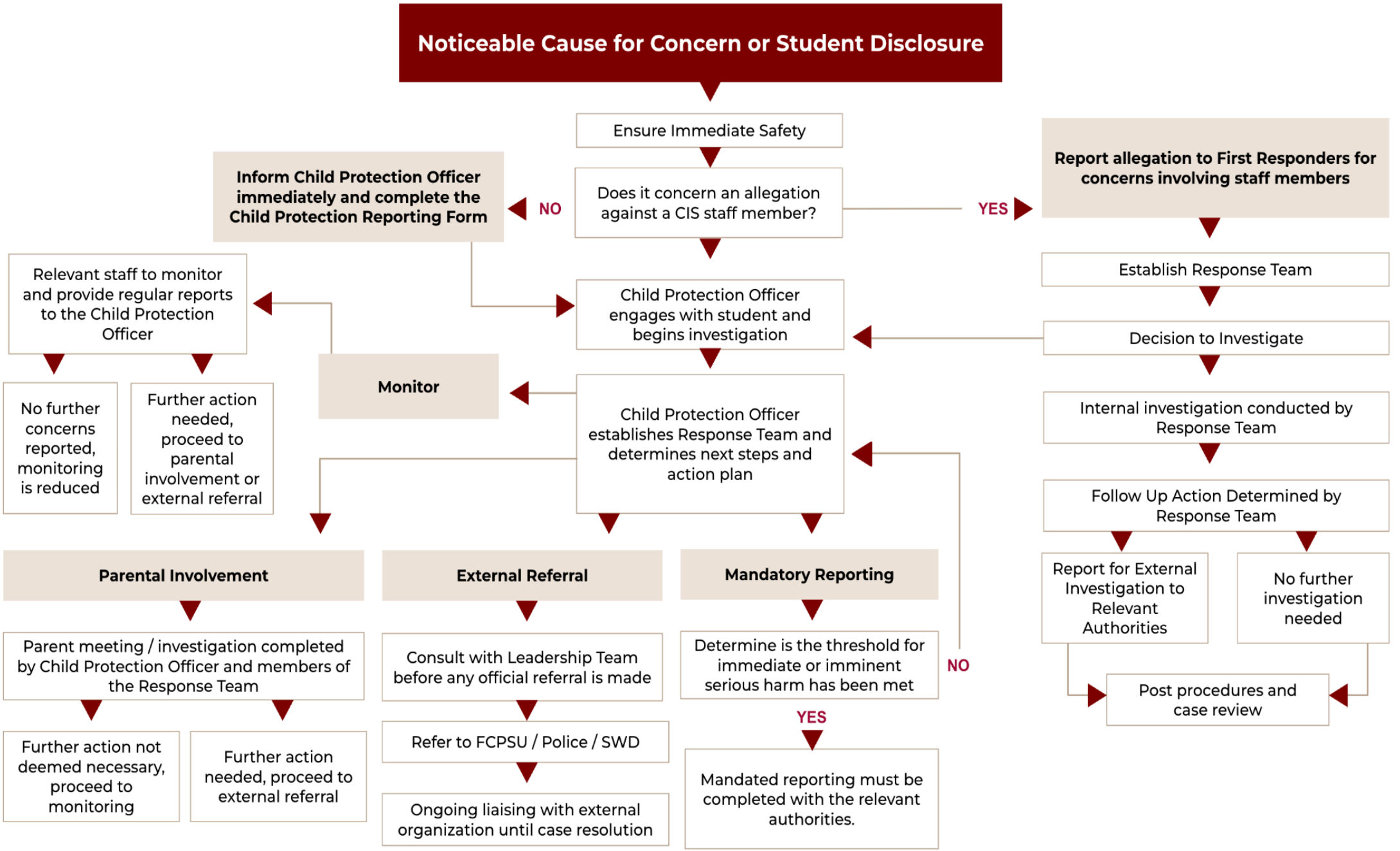
Appendix E Child Protection Training Cycle

To ensure comprehensive coverage, child protection training is primarily conducted at the beginning of the academic year for all new and current staff. Any member of staff joining the school mid-year is required to undergo full child protection training within their first week of employment. This cycle ensures that all employees, regardless of their start date, possess the necessary skills and resources to understand their responsibilities and the school-wide protocols for student safety.

New CIS Staff		
All New Teaching Staff	CIS Child Protection Induction Training	Twice annually. Induction training at the beginning of the academic year before students begin and then during semester two with current teaching staff.
All New Non-Teaching Staff	CIS Child Protection Induction Training	Once, at the beginning of the academic year.
All New Child Protection Officers, Additional Responders, and Leadership Team Members	CIS Child Protection Induction Training External Advanced Level Child Protection Course HK Mandatory Reporting Training	During induction training at the beginning of the year before students arrive. Once, during the first semester of the academic year. Once, during the first four weeks of the academic year.
Current CIS Staff		
All Current Teaching Staff	CIS Child Protection Refresher Training	Twice annually, at the start of the academic year and during the second semester.
All Current Non-Teaching Staff	CIS Child Protection Refresher Training	Annually, at the beginning of the academic year.
All Current Child Protection Officers, Additional Responders, and Leadership Team Members	CIS Child Protection Refresher Training External Advanced Level Child Protection Refresher Course HK Mandatory Reporting Training	Twice annually, at the start of the academic year and during the second semester. Every three years. Once, following the implementation of the law.
Additional Staff		
Staff Involved in Recruitment	Safer Recruitment Training	Every three years.

Externally Contracted Staff / Vendors	CIS Child Protection Training	Annually, at the beginning of the academic year.
Personal Helpers / Volunteers / CCA Providers	CIS Child Protection Training	Annually, at the beginning of the academic year.

Appendix F CIS Child Protection Response Procedural Flowchart



Appendix G Key Child Protection Personnel Chart

Members	Current Office Holders
Board of Governors	• Andrew Brandler, Chair • Venantius Tan, Vice Chair
Senior Leadership Team	**Hong Kong Campus** • Sean Lynch, Head of School • Li Bin, Deputy Head of School • Anne Gardon, Head of Primary • Christine Doleman, Head of Secondary **Hangzhou Campus** • Sally Zhang, Director • Chris Gibbs, Deputy Director
Whole School Child Protection Officer & Child Protection Leads	**Whole School Child Protection Officer** *(Hong Kong & Hangzhou)* • Alissa Kordprom **Child Protection Leads - Hong Kong** • Tracy Hayes-Williams, Head of Primary Student Life & Administrative Services • Brian Mulcahy, Deputy Head of Secondary, Director of Student Life **Child Protection Leads - Hangzhou** • Chris Gibbs, Deputy Director
Additional Responders	**Hong Kong Campus** • Irene Ortega-Martinez Seevers, Head of Counselling • Tanya Schindler, Secondary Counsellor • Monica Chang, Secondary Counsellor • Sarah Daly, Secondary Counsellor • See Lui Ng (Remy), Secondary Counsellor • Amy Colfelt, Primary Counsellor • Jamie Li, Primary Counsellor • Emily Lai, Primary Counsellor **Hangzhou Campus** • Ebru Kublay, Counsellor • Teck Wee, Head of House; Deputy Child Protection Officer **Business Office** • Adrian Huen, Director of Finance & Business Administration **Local Focal Points for Hong Kong Campus** • Hudson Hu, Senior BMS Operator • Nicky Kan, Senior School Bus Administrator • Doris Lai, Catering Manager
First Responders for Concerns Involving Staff Members	**Hong Kong Campus - Primary Staff Concerns** • Anne Gardon, Head of Primary **Hong Kong Campus - Secondary Staff Concerns** • Christine Doleman, Head of Secondary **Hangzhou Campus Concerns** • Sally Zhang, Director

	Whole School Concerns / Additional Responders • Li Bin, Deputy Head of School • Adrian Huen, Director of Finance & Business Administration • Catherine Han, Executive Director of Community Relations
Child Protection Committee	**Whole School Oversight** • Li Bin, Deputy Head of School • Alissa Kordprom, Whole School Child Protection Officer • Adrian Huen, Director, Finance & Business Administration • Brad Ren, Director of Operations **Hong Kong Campus** • Anne Gardon, Head of Primary • Tracy Hayes-Williams, Head of Primary Student Life & Administrative Services • Christine Doleman, Head of Secondary • JenniferSohn-Halliday, Deputy Head of Secondary, Director of Secondary Administrative Systems and Services • Brian Mulcahy, Deputy Head of Secondary, Director of Secondary Student Life • Amy Colfelt, Primary Counsellor • Irene Ortega-Martinez Seevers, Head of Counselling • Allan Fraser - Director of Sports & Activities **Hangzhou Campus** • Sally Zhang, Hangzhou Director • Chris Gibbs, Hangzhou Deputy Director • Ebru Kublay, Hangzhou Counsellor • Teck Wee, Hangzhou Head of House; Deputy Child Protection Officer

Appendix H Procedural Guidelines for Managing Suspected Abuse or Maltreatment Cases

Step 1: Initial Response and Fact-Finding

Identification of child abuse and maltreatment, or suspected child abuse and maltreatment, may occur through observations and/or conversations between a staff member and a student or group os students. When a staff member observes an incident or receives a disclosure—whether involving peers, staff, or external parties—they must immediately submit a formal Child Protection Reporting Form by hand and submit a hard copy to one of the individuals below.

Student Incidents or Disclosures	Allegations Against CIS Staff Member
If an incident concerns a student, the report should be submitted directly to one of the Child Protection Officers listed below. Child Protection Officers • Whole School Child Protection Officer • Head of Primary Student Life & Administrative Services • Deputy Head of Secondary, Director of Secondary Student Life • Deputy Director of Hangzhou	If an incident involves or concerns any CIS staff member, the report should be submitted directly to the first line responders listed below who directly supervises the staff member in question. First Line Responders • Head of Primary/Secondary Hong Kong • Director of Hangzhou • Deputy Head of School • Director of Finance and Business Administration • Executive Director of Community Relations *The designated first-responder receiving the report will take the steps listed below, in lieu of the Child Protection Officer, and will serve as coordinator of the Child Protection Response Team.*

1.1 The Role of the Child Protection Officer (CPO)

Upon receipt of a report, the Child Protection Officer will:

- Secure the immediate physical safety of the student.
- Notify the relevant Head of Primary/Secondary or the Director of the Hangzhou Campus. For Hangzhou cases, the Hangzhou Child Protection Officer will also notify the Whole School Child Protection Officer.
- Conduct initial fact-finding to assess immediate risk.
- Form a Child Protection Response Team to manage the case.

In cases where significant harm has occurred, or there is a threat of imminent and serious harm likely to occur, immediate action will be taken.

1.2 The Child Protection Response Team

Upon receiving a report, the Child Protection Officer will form the Child Protection Response Team to help gather relevant information, seek different perspectives, and help determine the

best course of action (unless immediate action is required).

The team is coordinated by the designated Campus's Child Protection Officer and typically includes the relevant Head of Primary/Secondary, the Director of the Hangzhou Campus, and student's counselor. It may also include the Head of School, Deputy Head of School, school nurse, the Head of Year (Hong Kong) or Head of House (Hangzhou), and/or other individuals as deemed appropriate.
The Child Protection Response Team will be responsible for continual fact-finding, which may involve:

1. Interviewing relevant staff.
2. Speaking with the student(s), if appropriate.
3. Consulting with relevant staff to review the student's history in school.
4. Documenting information relevant to the case.
5. Notifying the student's family, as appropriate.

The Child Protection Response Team will also be responsible for supervising measures outlined before in Steps 2 and 3, if deemed necessary.

1.3 Response Procedures and Documentation

Once a Child Protection Reporting Form is submitted, the school initiates a formal, structured response designed to ensure every case is investigated with clinical thoroughness, documented with legal precision, and managed with the highest standard of professional care. This protocol ensures a seamless transition from the initial disclosure to active safeguarding, maintaining a transparent audit trail while prioritizing the student's emotional and physical safety.

To ensure the highest level of security, all records are meticulously documented and maintained within CPOMS, our child protection online management system. Access to these records is strictly controlled, ensuring that all sensitive information remains confidential and is shared only with relevant personnel on a need-to-know basis.

To ensure impartial and rigorous oversight, incidents that potentially involve a member of staff are exempt from standard student-centered procedures. These cases are governed strictly by the CIS Managing Allegations Against a CIS Member of Staff Policy, which provides a distinct legal and investigative framework for handling professional misconduct.

Step 2: Implementing an Action Plan

Upon completion of the initial fact-finding phase, the Child Protection Response Team will develop a customized Plan of Action. This plan is designed to safeguard the student's immediate well-being while providing a structured pathway for long-term support for both the student and their family.

Core Intervention Strategies

The school may employ a combination of the following measures to gather deeper insight and provide immediate care:

- **Targeted Student Engagement**: Facilitated discussions between the student and a Child Protection Officer or school counselor using age-appropriate, trauma-informed strategies to understand the student's lived experience.
- **On-Campus Observations:** Discreet in-class or playground observations by qualified staff

(teachers, counselors, or administrators) to monitor social interactions and behavioral indicators.

- **Family Consultation**: Formal meetings with the family to transparently present the school's concerns and collaborate on supportive measures.

- **Expert Consultation**: Engaging with legal counsel, local authorities, or the Hong Kong Social Welfare Department or China Ministry of Civil Affairs. These staff can provide critical guidance, particularly in complex cases where the threshold for formal reporting is being evaluated.

Referral Pathways and Triage

CIS categorizes cases based on severity and specialized need to ensure students receive the most appropriate level of care:

Case Type	Primary Management Path	Examples
Foundational & Relational	In-House Support Managed by CIS Counselors and Child Protection Officers.	Peer conflicts, parenting/discipline strategies, student-parent relationships, anxiety, or grieving.
Complex Mental Health	External Specialist Referral Transition to qualified clinical professionals.	Clinical depression, psychosis, dissociation, or suicide ideation.
Statutory Abuse Cases	Mandatory External Reporting Immediate escalation to the SWD/FCPSU/police/local authorities.	Severe or ongoing abuse, sexual abuse, and incest.

External Referral Standards

In many instances, the best interests of the student require support from a mental health professional external to the school. CIS adheres to a strict vetting process for such referrals:

- **Clinical Integrity:** The school will only recommend external psychiatrists, psychologists, or counselors/therapists if they possess verified, appropriate qualifications.
- **Professional Accreditation:** Recommended specialists must hold active membership in a recognized professional body relevant to their field of practice.

Escalation to Authorities

In extreme or persistent cases where a student's safety remains compromised, the school will fulfill its mandatory obligations by filing formal reports with the appropriate relevant authorities in Hong Kong or Mainland China, including:

1. Hong Kong Social Welfare Department or China Ministry of Civil Affairs
2. Local Police Authorities
3. The Education Bureau
4. Other Relevant Jurisdictional Authorities, as needed/required.

Step 3: Ongoing Support

CIS is committed to the long-term recovery and stability of any student who has experienced trauma or maltreatment. Recognizing that child protection cases can create high levels of anxiety for the student, their family, and the staff involved, the school maintains a robust framework of ongoing support.

Post-Substantiation Protocols

Following a reported or substantiated case of abuse, the Child Protection Officer and the Child Protection Response Team are responsible for the following sustained actions:

- **Continuous Guidance:** Maintaining regular contact with the student and their family to provide ongoing emotional support and navigational guidance through the recovery process.
- **Staff Empowerment:** Providing the student's teachers and relevant Heads of School with the necessary resources, trauma-informed strategies, and materials to maintain a supportive classroom environment.
- **Multidisciplinary Liaison:** Serving as the primary point of contact for external therapists to ensure that the student's clinical progress is aligned with their academic and social experience in school.
- **Regulatory Coordination:** Maintaining an open channel with the relevant authorities to ensure the school remains in full compliance with safety requirements and reporting updates.

Care for Students and Staff

CIS recognizes that a child protection case impacts the entire school ecosystem. To ensure a holistic recovery process, we provide targeted support for students, staff, and families, fostering an environment of stability, empathy, and professional care.

Care for Students	• **Behavioral Monitoring:** Staff work collaboratively to monitor behavioral shifts for signs of post-traumatic stress. Decisions regarding specialized support, such as intensive school counseling or external psychological intervention, are made through a team-based approach. • **Predictability and Agency:** Significant stress often arises from uncertainty. To mitigate this, staff—where appropriate—involve the student in the process by clearly outlining expected next steps, helping them regain a sense of agency and safety. • **Integrated Communication:** Maintaining clear lines of communication between the school, the family, and external agencies is essential for developing effective, trauma-informed strategies that promote positive behavioral outcomes.
Care for Families	• **Transparent Guidance:** Families receive clear, ongoing communication regarding the school's processes and findings, helping to reduce anxiety and rebuild a sense of partnership and trust. • **Resource Navigation:** The school provides families with access to resource materials and referrals to vetted external specialists, ensuring they have the tools to support their child's recovery at home.

	• **Empathetic Engagement:** CIS acknowledges the distress families may feel and provides a designated point of contact (Child Protection Officer or counselor) to offer consistent emotional and navigational support.
Care for Staff	• **Support for First Responders:** The school ensures that Child Protection Officers and frontline staff have access to structured peer support and professional debriefing sessions to manage the emotional weight of a case. • **Employee Assistance:** Where necessary, CIS will help staff members receive confidential counseling and mental health support. • **Collaborative Care:** By working in multidisciplinary teams, staff avoid isolation in decision-making, ensuring that the burden of responsibility is shared across the professional community.

Appendix I Guidelines for Handling Abuse or Maltreatment Disclosures

To ensure every child feels heard and protected, CIS follows a rigorous four-step framework designed to manage disclosures with sensitivity, professionalism, and legal compliance. The four-step framework was created by International Child Protection Advisors, a leading organization that provides the advanced child protection training for specified CIS members and conducts the school's comprehensive external safeguarding audits.



1. Listen: Maintain a Calm and Attentive Presence

The primary objective is to create a safe space where the student feels comfortable sharing their experience.

- **Non-Verbal Communication:** Remain calm and reassuring, paying close attention to both the child's verbal account and their body language.
- **The Limit of Confidentiality:** If a student asks you to keep a secret, you must transparently state—before they continue—that you cannot maintain confidentiality if they are being harmed, are in danger, or disclose any form of abuse. Be prepared for the possibility that they may retract their statements; yet it remains essential to still report the incident.
- **Linguistic Sensitivity:** Be mindful of the student's language needs; they may require the support of a translator or be encouraged to express themselves in the language in which they feel most capable. Adapt your communication style to meet the needs of the student.

2. Believe: Prioritize the Student's Narrative

Your role is to act as a supportive recipient of the information, not as an investigator.

- **Suspending Judgment:** Avoid expressing anger, shock, disbelief, or skepticism, as these reactions can cause a student to retract their statement or shut down the disclosure. Do not comment on the offender's character, as it may be someone the student cares about.
- **Immediate Credibility:** Operate under the professional assumption that the student is telling the truth; it is your responsibility to accept the disclosure as valid at that moment.
- **Avoid Investigation:** Refrain from asking leading questions or attempting to "solve" the case. Use open questions like "Tell me about that," "What happened next," or "Did anything else happen?". The goal is to gather just enough information to assess the student's safety and to provide relevant details to the child protection team.

- **Documentation:** Confirm your understanding of the student's account before concluding the discussion. Reflect periodically during the conversation, using the student's own words, to ensure documentation is in their voice and through their lens.

3. Support: Ensure Immediate Well-being

Once a disclosure has been made, the student's emotional and physical safety is the immediate priority.

- **Validation:** Explicitly validate the child's experience and provide consistent reassurance that they have done the right thing by coming forward.
- **Escalation of Care:** If the situation requires specialized intervention, ensure the student is placed in the care of a Child Protection Officer, Counselor or member of the Leadership Team.
- **Crisis Intervention:** In any instance involving suicide ideation or self-harm, the student must be transitioned to the care of a Child Protection Officer, Counselor or member of the Leadership Team immediately.

4. Report: Formalize the Safeguarding Process

Reporting is a mandatory step that initiates the school's official response and complies with **Mandatory Reporting** statutory requirements.

- **Immediate Submission:** Once the student is safe and supported, you must immediately submit a formal Child Protection Reporting Form.
- **Factual Documentation:** While the details are fresh, record the disclosure exactly as it was told. Use the student's own words and verbatim quotes wherever possible to maintain the integrity of the report.
- **Chain of Responsibility:** Pass the completed hand-written report directly to the Child Protection Officer to trigger the school's formal investigation and assessment protocols. To maintain the highest levels of confidentiality and security, reports must be delivered directly to the Child Protection Officer; they should never be left on a desk, sent via unsecured channels, or passed through third parties. The reporter must never discuss the student's disclosure with anyone other than those in safeguarding roles.

Appendix J Mandatory Reporting of Child Abuse

CIS is fully aligned with the Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650), effective January 20, 2026, and the People's Republic of China on the Protection of Minors. These legislations mandate that specified professionals, including all registered or permitted teachers, must report suspected cases of serious child abuse or neglect.

Students attending the residential program at the Hangzhou Campus are also covered by Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650). Given the unique nature of this year-long immersion, CIS ensures that safeguarding standards remain consistent across borders, requiring that all staff and residents adhere to both the school's global protection frameworks and the specific legal mandates of the local region. This dual alignment ensures that despite the temporary nature of the residency, the safety, legal rights, and well-being of every student are protected to the highest international and local standards.

Statutory Compliance and Duty to Report

In accordance with the above laws, CIS staff must fulfill the following legal obligations:

- **Mandatory Reporting:** Staff must report to the relevant Authority as soon as practicable if, during the course of their work, they have reasonable grounds to suspect a child is suffering serious harm or is at real risk of suffering serious harm.
- **Professional Accountability:** Failure to comply with these reporting requirements may be a criminal offense, punishable by fines and imprisonment.
- **Reporting Requirements**: All reports must be made in the manner specified by the overseeing authority and must include sufficient information to identify the child, the grounds for suspicion, and the contact information of the professional making the report.

Conditions and Exemptions

A specified professional is not legally required to make a report if they honestly and reasonably believe:

- The serious harm was caused solely by an accident not involving neglect by a responsible person.
- The harm was caused solely by the child themselves or by another child (excluding acts of a sexual nature).
- A report for the same or substantially the same harm has already been made to an Authority by themselves or another professional.

Internal Protocols and Protection

- **Reporting Framework**: CIS maintains internal reporting guidelines that align with the relevant laws to ensure all staff can meet their statutory duties efficiently and correctly.
- **Exceptions to Reporting:** Staff are not required to make a duplicate report if they reasonably believe the harm was accidental (not caused by neglect), caused solely by the child, or if they are certain a report has already been filed by another staff member.
- **Staff Protection:** CIS upholds the statutory protections provided to professionals who make reports in good faith, ensuring they are supported throughout the legal and reporting process.
- **Team Reporting:** At CIS, because there is a dedicated child protection and crisis management team, the Whole School Child Protection Officer will make the official report on behalf of the school and serve as the primary liaison between the relevant authorities. While

the Whole School Child Protection Officer coordinates this submission, the names of all staff members who initially identified, handled, or contributed to the case will be formally recorded within the team reporting template to maintain clear accountability and documentation.

However, should any staff member or individual has reason to believe that the school is failing to report a disclosure, handling a case improperly, or acting in non-compliance with statutory mandates, they maintain the right—and the independent legal obligation under mandatory reporting frameworks—to bypass internal channels and report the matter directly to the relevant authorities on their own initiative.