

# Child Protection and Safeguarding Policy

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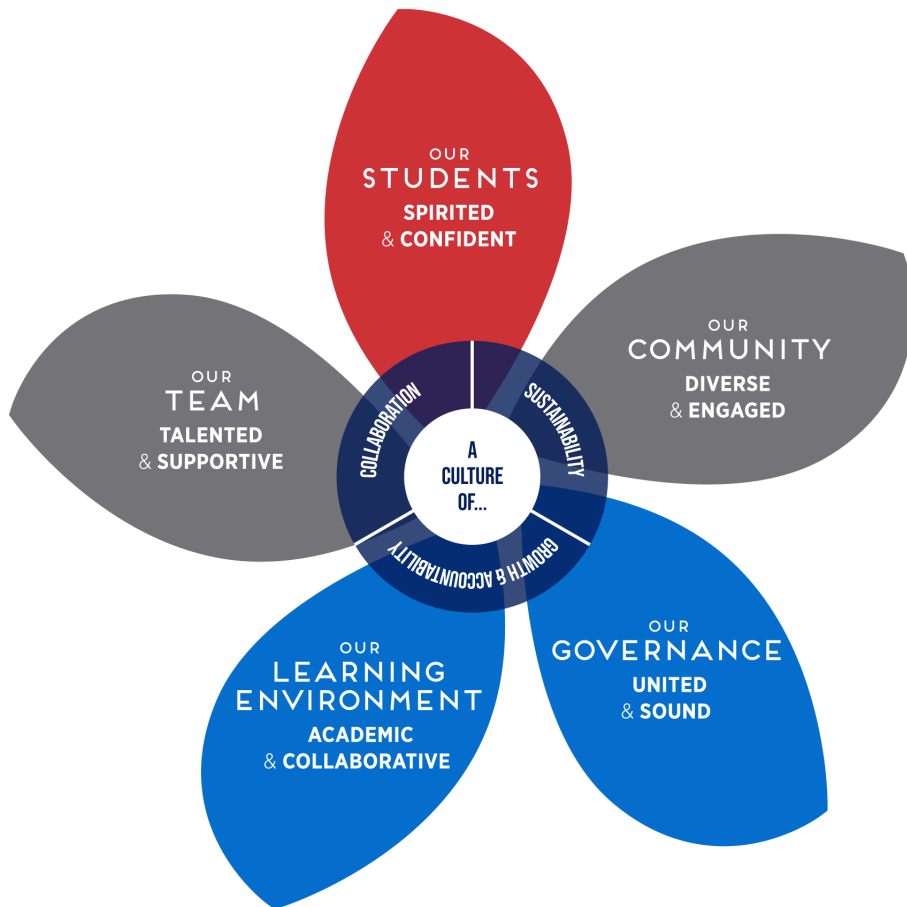
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**French International School (FIS) should...**

- 1. Ensure a safe and healthy learning environment by strengthening the school's Child Protection framework and practices.



## **1. Policy Statement and Principles**

At FIS, we are a multicultural school, offering diverse curricula built upon values of global mindedness, critical thinking and personal development.

Our mission is to energise young minds, prepare independent and compassionate life-long learners and inspire our students to achieve their full potential.

We reach our goals by providing a collaborative and stimulating bilingual learning environment where all members of our community are valued and respected.

Child abuse and neglect are of growing concern in schools throughout the world. These violations of a child's human rights are obstacles to the child's education as well as to their physical, emotional, and spiritual development.

Schools fill a special institutional role in society as protectors of children. Schools need to ensure that all children in their care are afforded a safe and secure environment in which to grow and develop. Educators, having the opportunity to observe and interact with children over time, are in a unique position to identify children who need help and protection. As such, educators have a professional and ethical obligation to identify children who are in need of help and protection and to take steps to ensure that the child and family avail themselves of the resources and services required to remedy any situation which constitutes child abuse or neglect.

FIS is fully committed to the protection of children in its care and will ensure that all children in our care are afforded a safe and secure environment in which they are respected and valued and able to grow and develop. We encourage children to talk openly and to feel confident that they will be listened to. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of the school's safeguarding responsibilities. We recognize that where safeguarding and child protection are concerned – 'it could happen here.' FIS strictly adheres to all applicable local statutes with regard to child protection. We will ensure that our children enjoy the right to be protected from harm and exploitation and to have their welfare safeguarded. The scope of this policy means that FIS will attend to all cases occurring within the 4 campuses as well as cases that are disclosed to school staff, which might occur off school premises. FIS staff is trained to recognise signs of abuse and is committed to disclosing and acting upon any suspected abuse. The school is also committed to acting upon what is disclosed and, irrespective of where any abuse might take place, will do everything to support the child.

This policy is available on the school website.

Our core safeguarding principles are:

- safeguarding is everyone's responsibility
- the school's responsibility to safeguard and promote the welfare of children is of paramount importance

- cases remain highly confidential
- safer children make more successful learners
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

### **1.1 Child protection statement**

According to the World Health Organization (WHO), child abuse constitutes “all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.”

FIS respects all laws and subsidiary legislation applicable in Hong Kong , and seeks to be a safe haven for students who may be experiencing abuse or neglect in any aspect of their lives. FIS will communicate these policies and procedures annually to employees and will provide ongoing training for all staff members and regular information to our school community. FIS has implemented rigorous hiring practices which make every effort to ensure the safety of children.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students whilst enrolled at FIS. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and board members.

### **1.2 Policy principles**

- The welfare of the child is paramount.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff have responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- All staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.
- Students and staff involved in child protection issues will receive appropriate support.

### **1.3 Policy aims**

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities.
- To ensure consistent good practice.

- To demonstrate the school's commitment regarding child protection to students, parents and other partners.
- To create an atmosphere where everyone feels supported and able to report.
- To show a commitment to minimising safeguarding risks to children.
- To work sensitively and appropriately with all stakeholders for the benefit of the child.

### 1.4 Key Terminology

**Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

**Child protection** refers to the processes undertaken to protect children who have identified as suffering or being at risk of suffering significant harm.

**Staff** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

**SLT** refers to the Senior Leadership Team of the school

**DSL** refers to the designated safeguarding lead(s) at the school

**DSC** refers to the designated safeguarding coordinator at the school

**Child** refers to everyone under the age of 18.

**Parent** refers to birth parents and other adults who have the status of legal guardian, for example step-parents, foster carers and adoptive parents.

**Early Help** refers to the additional limited time and targeted help or support via outside agencies.

## 2. Safeguarding legislation and guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

*(NOTE: FIS is a company incorporated in Hong Kong and subject to Hong Kong laws and regulations only. The inclusion of, or reference to any laws, regulations, or guidance material from foreign jurisdictions in this policy document (e.g., UK and French laws) is for informational or illustrative purposes only and does not impose any obligations on FIS beyond those imposed by Hong Kong laws and regulations. Any deviations or inconsistencies between*

*foreign laws, regulations, or guidance material referenced in this policy and Hong Kong laws and regulations, whether referenced or not, are to be interpreted in favour of the latter):*

### **2.1 Hong Kong Legislation:**

- Crimes Ordinance, Cap. 200
- Offences Against the Person Ordinance, Cap. 212
- Personal Data (Privacy) Ordinance, Cap. 486
- Child Care Services Ordinance, Cap. 243
- Protection of Children and Juveniles Ordinance, Cap. 213
- Education Ordinance, Cap. 279
- Domestic and Cohabitation Relationships Violence Ordinance, Cap. 189
- Mandatory Reporting of Child Abuse Ordinance, Cap. 650 (*Effective January 2026*)

### **2.2 United Kingdom Legislation and Guidance** *(for illustrative purposes only):*

- Working Together to Safeguard Children 2018
- Working Together: Transitional Guidance 2018
- Keeping Children Safe in Education 2023
- What to do if you're worried a child is being abused 2015
- PACE Code C 2019
- Section 175 of the Education Act 2002 (maintained schools only)
- Section 157 of the Education Act 2002 (Independent schools only, including academies and Free Schools)
- The Education (Independent School Standards) Regulations 2014 (Independent schools only, including academies and Free Schools)
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012

### **2.3 French Legislation and Guidance** *(for illustrative purposes only):*

- Code de l'Action Sociale et des Familles (Social Action and Families Code), including provisions on child welfare and protection (Articles L112-3, L221-1, etc.)
- Code Pénal (French Penal Code), including laws addressing crimes against children and vulnerable persons (e.g., Articles 227-22 to 227-27)
- Loi n° 2007-293 du 5 mars 2007 réformant la protection de l'enfance (Law reforming child protection)
- Loi n° 2016-297 du 14 mars 2016 relative à la protection de l'enfant (Law on child protection)
- Décret n° 2018-903 du 23 octobre 2018 (Decree on reporting obligations for child protection professionals)
- Circulaire n° 2015-066 du 16 avril 2015 (Circular on child protection in educational

### **3. Safeguarding Risks for Children**

#### **3.1 Affluent Neglect**

Affluent neglect can often be difficult to spot. This may be due to preconceived conceptions about what neglect actually is and who can be impacted.

In affluent families:

- Parental emotional neglect due to not spending enough quality time with the child
- Parents may work long hours, leaving children in the care of paid nannies and au pairs.
- Parents may also put a high amount of pressure on their children to succeed at school, which can sometimes lead to psychological and emotional problems
- Known as the “Toxic Trio” parental alcohol/ substance abuse, domestic violence and parental mental illness can be found in any type of family and have lasting effects on the children in the home.
- Parents may have a more relaxed attitude to supervision and guidance which can lead to drug use, sexual activity, and sexuality; as a consequence their children are exposed to more risks
- Wealthier families may have the material resources to hide physical and supervisory neglect while being psychologically or emotionally neglectful.

#### **3.2 Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidents of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through positive behaviour approaches.

In addition, the school responds to all cases in accordance with the FIS Anti-Bullying Policy, which outlines prevention measures, reporting procedures, and intervention strategies.

#### **3.4 Peer-on-peer abuse**

Children may harm or be harmed by other children or young people. Staff are trained to be aware of the harm caused by bullying and will be trained to apply the school’s child-on-child abuse policy and anti-bullying procedures where necessary. All child-on-child abuse is unacceptable and will be taken seriously. According to recent UK research peer on peer abuse is by far the most common incident requiring intervention from the schools.

Child-on-child abuse can take many forms including:

- physical abuse such as shaking, biting, hitting, kicking or hair pulling
- bullying, including cyberbullying, prejudice-based and discriminatory bullying
- sexual violence and sexual harassment such as inappropriate sexual language, touching, sexual assault or rape

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) including pressuring another person to send sexual imagery or video content
- abuse in intimate personal relationships between peers (also known as teenage relationship abuse) - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse
- upskirting – taking a picture under a person’s clothing without their permission for the purposes of sexual gratification or to cause humiliation, distress or alarm
- initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which intend to promote a bond between them
- prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Abuse is abuse and should never be tolerated or passed off as ‘banter’, ‘just having a laugh’ or ‘part of growing up’. Tolerance of such behaviours can lead to a culture of unacceptable behaviours and an unsafe environment for children.

### **3.5 Eating Disorders**

Changes in mood, behaviour and performance may indicate an eating disorder. Eating disorders include extreme emotions, attitudes, and behaviours surrounding weight and food issues. Eating disorders result in serious emotional and physical problems that can have life-threatening consequences. Males and females from as young as seven years old may develop eating disorders, though they are more commonly diagnosed during adolescence and early adulthood.

*Anorexia Nervosa* is characterised by deliberate self-starvation and the following: refusal to maintain body weight at or above normal weight, intense fear of gaining weight, distorted perception of one’s body (weight/size/shape), absence of at least three consecutive periods (females).

*Bulimia Nervosa* is characterised by recurrent episodes of binge eating usually followed by self-induced vomiting or some form of purging as a means of controlling weight (ex. vomiting, laxatives, diuretics, fasting, excessive exercise).

### **3.6 Self-Injury**

Self-injury is basically defined as deliberate self-inflicted harm resulting in tissue damage without the conscious intent of suicide. Behaviours include, but are not limited to: cutting,

burning, head banging, interfering with healing of wounds, hitting, biting, or scratching oneself. Despite the increase in self-injury among adolescents, there is still a stigma attached to the behaviour. It is important for caregivers to recognize that self-injury, like substance abuse and eating disorders, is a coping strategy used by people who are in emotional distress. The typical onset of self-harming acts is puberty, although it can be seen in young children as well as adults. Many report that they were discouraged from expressing emotions, particularly anger and sadness.

In a school setting, teachers are frequently the first adults to know of a student's self-injurious behaviour. Self-injury is an attempt to cope with a problem and not the problem itself. It is a cry for help. One of the most important things to remember is that the tone of response can be equally or even more important than actual words. The goal is to respond in a calm, non-judgmental fashion.

### **3.7 Domestic abuse**

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial, economic and emotional abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.

Any child can witness and be adversely affected by domestic abuse in their home life. Experiencing domestic abuse can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

All staff should be aware of the impact domestic violence can have on a child. If any staff member is concerned that a child has witnessed domestic abuse, they should report their concerns immediately to the DSL.

### **3.8 Wellbeing**

Mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should be aware that where children have suffered adverse childhood experiences, those experiences can have an impact on their mental health, behaviour and education. Staff should observe children for such indicators and act according to this policy when indicators are present.

Where staff are concerned that a child's mental health is also a safeguarding concern, they should discuss it with the DSL or a deputy.

### **3.9 Technology use**

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation.

FIS has ensured that appropriate and effective filters and monitoring systems are in place to block harmful and inappropriate content by managing the content available to students, who can contact our students and the personal conduct of our students online. FIS takes care to ensure that these systems do not unreasonably impact on teaching and learning, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. FIS also has effective monitoring strategies in place to meet the safeguarding needs of our students. FIS's filtering and monitoring systems are reviewed regularly to ensure their effectiveness.

Online safety risks can be categorised into four areas of risk:

- content - being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism
- contact - being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children
- conduct - personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying
- commerce - risks such as online gambling, inappropriate advertising, phishing or financial scams.

All staff should be aware of these risk areas and should report any concerns to the DSL.

### **3.10 Sharing nudes and semi nudes**

Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes in the context of this policy means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or done offline between devices via services like Apple's AirDrop.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents involving total or partial nudity. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'youth produced sexual imagery' and 'youth involved sexual imagery'.

The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame
- All incidents involving youth produced sexual imagery will be responded to as follows:
  - The incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved.
  - Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
  - At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded, and the police will investigate. This may include seizure of devices and interviews with the young people involved.

### **3.11 Suicidal Behaviour**

Any child or young person, who expresses thoughts about suicide, must be taken seriously. Appropriate help and intervention should be offered at the earliest point. Any member of staff who is made aware that a child or young person is contemplating suicide should talk with the DSL without delay.

#### **Facts about Suicidal Adolescents**

- Most adolescents' suicide attempts are precipitated by interpersonal conflicts.
- Most teens will reveal that they are suicidal; however, they are more willing to discuss suicidal
- thoughts with a peer than a school staff member.
- Most suicidal adolescents do not want suicide to happen. The person who contemplates suicide believes that the action will end the pain of feeling hopeless and helpless or is making a dramatic plea for help.

- One of the most powerful predictors of completed suicide is a prior suicide attempt.
- On average every high school will have at least one student every five years who commits suicide.
- Typically, there will be multiple student suicide attempts at any given school – though staff and administration may not hear about them.

#### Behavioural Clues

- Previous suicide attempt
- Depression, moodiness, hopelessness
- Putting personal affairs in order
- Giving away prized possessions
- Sudden interest or disinterest in religion
- Unexplained anger, aggression, irritability
- Drug or alcohol abuse or relapse
- Sudden decline in academic performance
- Decline in personal hygiene
- Sudden improvement in mood – or grandiose plans

#### Situational Clues (from *Preventing Youth Suicide*)

- The death of a family member or close friend
- Anniversary dates of painful life events such as the death of a parent or loved one
- Tough transition times (e.g., parental divorce, breakup of a romantic relationship, anxiety over graduation, rejection by valued friend or social group, school transfer)
- Being socially isolated and lonely—lack of close personal relationships
- Being the target of bullying or harassment
- Problems with blended family relationships (stepparents or siblings)
- Chronic and intensifying conflict with parents, teachers, employers, peers
- Severely dysfunctional family situations (substance abuse, sexual abuse, violence)
- Onset of serious illness in youth or family member with little hope for improvement
- Experience or anticipation of significant failure or embarrassment
- Loss of job or valued role
- Incarceration or pending incarceration, trouble with the law
- Serious alcohol or drug abuse, with either primary or secondary depression

- Confirmation of an unwanted pregnancy
- Being forced to take on what seem like overwhelming responsibilities
- Intense pressure for achievement coupled with fear of disapproval or failure
- Conflicts over one's emerging sexual identity or preference

FIS has established a specific policy and set of prevention guidelines. The Suicide Risk Mitigation Policy and Procedures aim to guide practice and reduce risk through targeted prevention actions. This policy is based on the **Tier 3 model**, which provides intensive, individualized support for students identified as being at the highest level of risk.

### **3.12 Students with Learning Enhancement needs and disabilities**

Children with Learning Enhancement (LE) needs and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with LE needs and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff are trained to manage these additional barriers to ensure this group of children are appropriately safeguarded.

### **3.13 Crime-related abuse**

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

All staff are made aware of the range of risk factors which increase the likelihood of involvement in serious violence, having been frequently absent or exclusions from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

### **3.14 Child criminal exploitation (CCE) and child sexual exploitation (CSE)**

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including age, gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

The school includes the risks of criminal exploitation and sexual exploitation in the PSHE and wellbeing curriculum. A common feature of such exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. Staff should act in accordance with this policy if there is any suspicion of CCE or CSE. Please see more details in the Appendix.

### **3.15 Honour-based abuse**

'Honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. Staff and the DSL are trained to be aware of this dynamic and should consider it when deciding what safeguarding action to take.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which an individual does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

### **3.16 Radicalisation and terrorism**

Terrorism can be defined as using unlawful violence or intimidation against people for ideological or political ends. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Schools should remain alert to the risk of radicalisation into all forms of extremism. School staff receive training to help to identify signs of extremism.

### **3.17 Children under guardianship**

One reason for children being made subject to guardianship orders is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep such children safe. Appropriate staff will have access to information about a child's legal status and guardianship arrangements where the school is in possession of such information.

### **3.18 Children who have a social worker**

Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with FIS, and the DSL will hold and use this information to inform decisions about safeguarding and promoting the child's welfare.

### **3.19 Work experience**

The school has detailed procedures to safeguard students undertaking work experience, including, where applicable, arrangements for checking people who provide placements and supervise students on work experience which are in accordance with the guidance in *Keeping Children Safe in Education (2023)*.

### **3.20 Children staying with host families**

The school may arrange for students to stay with a host family during a foreign exchange trip or sports tour. Some overseas students may reside with host families during school terms and FIS will work with the relevant local authorities such as the Social Welfare Department to check that such arrangements are safe and suitable.

It is not possible for schools to obtain criminal record information about adults abroad. Where students stay with families abroad, FIS will make arrangements with partner schools. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate to safeguard the students, which will include ensuring students understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. FIS will also make parents aware of these arrangements.

### **3.21 Students who are absent from education**

Attendance, absence and exclusions are closely monitored. A child being absent from education for prolonged periods and/or on repeat occasions, and a child going missing from education is a potential indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation or mental health problems. The DSL will monitor unauthorised absence and take appropriate action including notifying the local authorities according to FIS attendancy policy.

## **4. Why international school students are vulnerable**

We must never assume that because the children in our care are by and large from economically advantaged backgrounds that they are rarely or never subjected to issues surrounding child protection and safeguarding. Similarly, Hong Kong can give the illusion of being very safe and can trick us into thinking that there are no problems. We all need to be aware of these biases.

Note: the examples given in this section 4 are for illustrative purposes only and are not intended to be exhaustive.

#### **4.1 Characteristics/ attributes of international school children**

- transience and mobility impacts development of identity and relationships (especially for support in times of need)
- Early maturity/ sophistication vs. naiveté and immaturity in other areas
- Separation from extended families; working and travelling parents, and separation from long term friendships/ relationships results in attachment issues and thus support during times of crisis or need may be minimal or non-existent
- Lost between multiple and sometimes conflicting cultures and value systems resulting in confusion of behavioural expectations.
- High expectations placed on students to achieve academically
- Access to maids and other daily helpers (drivers)
- Access to expensive international schools because companies pay tuition while they (and their peers) in their home-of-record, previously attended public school

#### **4.2 Characteristics of international school families**

- Isolation from extended family, previous community for support
- Power differential in marriage (Who has the work permit?) creates vulnerability
- Impact of absentee parents
- “Love-hate” relationship with host country for expatriates
- Lack of control over critical life decisions: company decides where, when, and how the family moves
- Lack of stability
- Superficial/ tourist relationship with host country
- affected by parental substance misuse, domestic violence or parental mental health needs

#### **4.3 Characteristics of international school communities**

- School takes on sole role as centre of family life - “goldfish bowl”
- Power influence: family’s “position” in community can be an inhibitor for school to act
- Sense of being “lost” in diversity of community can cause further isolation

#### **4.4 Cultural dynamics of international school communities**

- Multiple norms rooted in different cultural traditions can cause confusion: religious values, values of parenting, discipline, care-giving, sexuality, gender roles and responsibilities
- Impact of rapidly changing “pop culture” from developed nations

- Varying degrees of openness rooted in cultural tradition
- Varying cultural attitudes toward gender issues and child development - different concepts of developmental need through childhood

International school communities can be vulnerable as abuse requires secrecy, insularity, isolation and limited access to support resources. Perpetrators could use these characteristics to their advantage.

The order of the risks outlined below is the result of work done by the VSC. The risks are listed in terms of high, medium or low risks for FIS. Please note that because a risk is deemed low at FIS, it does not mean that these risks should be considered as impossible.

## **5. Safeguarding Roles & Responsibilities**

At FIS, safeguarding and child protection are shared responsibilities that involve all members of the school community, including staff, students, parents, and the Board of Directors. Each role contributes uniquely to maintaining a safe and supportive environment for all students.

All school staff share the responsibility for safeguarding and ensuring the well-being of children. They are required to report any concerns to the DSL and act in the best interests of the child by identifying issues early and supporting external agencies when necessary. Staff must also create an inclusive and secure learning environment, participate regularly in safeguarding training, and strictly adhere to safeguarding policies. Staff may also have a duty under Hong Kong law to make a report to the appropriate authorities in certain safeguarding situations, as detailed in section 5.3 below

At FIS, the vice principals serve as DSLs, overseeing all aspects of safeguarding and child protection, including local legal compliance and online safety, across their campuses. The head of the health department acts as the DSC, supporting the DSLs by promoting a unified approach to child protection across all campuses.

### **5.1 Designated Safeguarding Leads**

Designated Safeguarding Leads serve as the primary point of contact for staff and parents regarding safeguarding issues. They provide guidance and expertise on safeguarding concerns, follow up with parents, and assist staff in reporting potential abuse to the relevant authorities. They are responsible for maintaining confidential records, which are securely stored and kept separate from academic files.

When students transfer to another school, DSLs make all feasible efforts to send safeguarding records to the receiving school separately and securely, obtain confirmation of receipt, and then securely dispose of any retained copies. They also make all feasible efforts to obtain safeguarding records from the student's previous school.

## **5.2 Designated Safeguarding Coordinator**

The DSC is responsible for ensuring a consistent and effective approach to child protection across all campuses and educational pathways. The DSC collaborates closely with the SLT and DSLs in the following key areas:

- The DSC supports the HR Director in coordinating child protection and safeguarding induction sessions for new staff members. The DSC may also provide input to the HR Director regarding the timing of regular safeguarding training for all school staff.
- “The DSC supports a consistent and effective child protection approach across all campuses, including student prevention programmes.”
- The DSC monitors annual safeguarding trends and reports significant cases and trends to the Head of School. The Head of School then reports these findings to the Board of Directors.

## **5.3 Mandatory Reporting of Child Abuse Ordinance (“MRCAO”)**

This section is intended to provide an overview and simplified guide to staff in respect of the contents of the MRCAO. It is not intended to be a comprehensive restatement of the MRCAO, nor does it constitute legal advice. Staff should refer to the full text of the MRCAO or seek assistance of the DSL if unsure.

Notwithstanding anything in this section, under this policy, all staff members have a professional and moral obligation to report any child safeguarding concerns to the DSL, regardless of whether a report is made or required to be made under the MRCAO.

### **5.3.1 Mandatory Reporting Procedure**

The MRCAO, effective in Hong Kong from 20 January 2026, legally requires certain professionals, such as teachers, psychologists, speech therapists, and counselors, to report suspected cases of serious child abuse to an “Authority”. As at the date of this policy, this means the Director of Social Welfare or the Commissioner of Police.

The MRCAO lists out all the categories of specified professionals it applies to. The full list can be found in Appendix 1. You are advised to read this list and check if you fall into one or more of the categories of specified professionals. This is an individual responsibility.

The MRCAO requires the above-mentioned specified professionals to make mandatory reports of cases where they have a reasonable ground to believe that a child is suffering, or is at real risk of suffering, serious harm, as soon as practicable after they become aware of this.

What constitutes “serious harm” is defined in the MRCAO, and this definition can be found in Appendix 2. Staff should familiarise themselves with this definition so that they are able to recognise when their duty to make a mandatory report is triggered.

The MRCAO mandates that all reports have to be made to the relevant authorities in the manner specified by the Director of Social Welfare and must contain the following information:

- Sufficient information for the Authority to identify the child;

- The “reasonable ground” on which their belief that the child is suffering or at risk of suffering serious harm is based; and
- The contact information of the specified professional making the report.

However, specified professionals do **not** need to make a report in certain situations, such as when a report has already been made in respect of the incident, or where the serious harm to the child does not stem from child abuse, for example, accidents; self-harm; or is caused by another child (except in cases of a sexual nature, in which case a report does need to be made).

If in doubt, specified professionals should make a report rather than risk committing an offence, as the making of a report in itself will not constitute an offence under the MRCAO.

### **5.3.2 Offences under the MRCAO**

The following are considered criminal offences under the MRCAO:

- Failure by a specified professional to make a report as soon as practicable upon having a reasonable ground to believe that a child is suffering, or is at real risk of suffering, serious harm;
- Disclosure of the identity of, or information from which the identity can be deduced, of a specified professional who has made a report under the MRCAO; and
- Willfully obstructing or inhibiting a specified professional from making a report.

### **5.3.4 Defences under the MRCAO**

The MRCAO also provides defences for specified professionals who commit offences. These include having a reasonable excuse for not making a report, or not making the report as soon as practicable because the professional honestly and reasonably believed that the delay was in the best interests of the child, and has during the delay taken other reasonably necessary actions to protect the interests of the child.

## **5.4 The role of the Board**

The Board plays an important role in having oversight. The Board will be informed about significant cases that reach Head of School level. There will also be an annual report made to the Board analysing patterns and the incidence of safeguarding/child protection issues. There will also be an identified safeguarding lead at Board level who will be nominated yearly and will engage with the Head of School to monitor and oversee how safeguarding is managed in the school.

## **5.5 The role of the Senior Leadership Team**

The Senior Leadership Team will work with the DSLs specifically around issues of confidentiality. It is extremely important to communicate with parents as and when it is appropriate and to encourage them to follow school advice in relation to specific cases in order to maintain confidentiality, especially in relation to social media. This is the responsibility of the SLT. Ultimately, the Head of School is responsible for oversight and implementation of this policy.

## **5.6 The role of parents/students.**

At FIS we believe that all members of the community should take responsibility for creating a safeguarding culture. To this end, the CVS helped to develop some guidelines for parents and students. Parents should endeavour to ensure that they play a full and positive role in the lives of their children by being present and consistent. They should be interested and attentive, encouraging their children thereby establishing a trusting relationship. They should set clear boundaries around things like screen time and be good role models themselves around their use of screens and social media. Finally, parents should be attentive to potential abuse their children may exhibit, either as victims or perpetrators, and disclose any concerns to the administration of the school.

Students too need to be kind and respectful to one another and be prepared to intervene on behalf of their peers, should they witness any forms of abuse. They should be prepared to take ownership of their actions and be attentive to the signs that they or others might be being abused. They should ensure that they speak out when they witness issues and also be prepared to talk to trusted adults when necessary.

## **6. Safeguarding related to staff**

### **6.1 Recognising abuse**

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education (DfE 2023) refers to four categories of abuse. These are set out at Appendix 3 along with indicators of abuse.

### **6.2 Abuse of position of trust**

Staff members are reminded that they are in a position of trust, and as such owe a duty of care to students. It is part of their duty to safeguard the well-being of students. Engaging in any form of inappropriate behaviour, including but not limited to any form of sexual activity or exploitation, with a student is strictly prohibited. Such behaviours are not only contrary to the principles of child protection but may also be in violation of applicable laws and regulations, for example a staff member engaging in a sexual relationship with a student under the age of 16 may be committing a criminal offence under the Crimes Ordinance.

### **6.3 Whistleblowing if you have concerns about a colleague**

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must

remember that the welfare of the child is paramount. The school's whistleblowing code (FIS Whistleblowing guidelines) enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the DSL. Complaints about the DSL should be reported to the Head of School

#### **6.4 Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers**

When a safeguarding concern or allegation is made about a member of staff, including supply staff, contractors or volunteers, or relates to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children our set procedures must be followed. The full procedures for dealing with allegations against staff and managing low level concerns raised about staff are dealt with the involvement of the HR Department.

Safeguarding concerns or allegations made about staff who no longer work at the school, or historical allegations should be reported to the DSL who will report to the police if deemed necessary to do so.

#### **6.5 Staff and Board training**

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation, online safety (including an understanding of the expectations, applicable roles and responsibilities for filtering and monitoring) and to know what to do if they have a concern. All staff need to have completed the basic level in their first year, after recruitment and all staff on a two yearly rolling basis. It is important to ensure that the training is standardised across streams and divisions.

New staff receive a briefing during their induction, which includes the school's child protection policy and staff behaviour policy, reporting and recording arrangements, and details for the DSL. All staff, including the DSL, head of school (unless the head of school is the DSL) and directors will receive training that is regularly updated. All staff will also receive safeguarding and child protection updates via email, e-bulletins, website access and staff meetings throughout the year.

Our Board receives appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities for filtering and monitoring) training at induction which equips them with the knowledge to provide strategic challenges to test and assure themselves that there is an effective whole school approach to safeguarding. This training is updated annually by DSLs. It is an expectation that all Board members undertake online training as part of their induction at the beginning of their mandate and update their training once during their term (every 3 years).

#### **6.6 Safer recruitment**

Our school is aware of the requirements contained in Keeping Children Safe in Education (2023) and implements best practices by carrying out relevant checks and verifying the applicant's identity, qualifications and work history. The school's Staff Recruitment procedure sets out the process in full and is available. At least one member of each recruitment panel will have attended

safer recruitment training.

The school obtains written confirmation from supply agencies or third party organisations that supply staff or other individuals who may work in the school have been appropriately checked and are suitable to work with children.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

Staff should disclose to the school anything arising during their employment that impacts on their suitability to care for children.

### **6.7 Staff/student online relationships**

The school provides guidelines to staff regarding their personal online activity. Staff are expected to adhere to the guidance regarding online contact with students. Staff found to be in breach of these guidelines may be subject to disciplinary action or child protection investigation.

### **6.8 Best practices include**

- Providing supports that respond to an individual's needs.
- Respecting an individual's right to self-identification.
- Maintaining school records in a way that respects privacy and confidentiality.
- Ensuring dress codes respect an individual's gender identity and gender expression.
- Enabling students with diverse sexual orientations, gender identities and gender expressions to have full, safe, and equitable participation in curricular and extracurricular activities.
- Providing professional learning opportunities that build the capacity of school employees to understand and support diverse sexual orientations, gender identities, and gender expressions.
- Using a comprehensive whole-school approach to promote healthy relationships and prevent and respond to bullying behaviour.
- Ensuring students have the understanding, skills and opportunities to contribute to welcoming, caring, respectful, and safe learning environments that respect diversity and nurture a sense of belonging and a positive sense of self.
- Ensuring all students are welcomed and supported as valued members of the school community.
- Early Childhood Guidelines : Early childhood school employees are more likely to have physical contact with younger students, for example, when offering comfort or guidance, and in daily aspects of their teaching. This may involve assisting students who have soiled themselves or those who need help dressing or undressing at appropriate times. Such contact must be authorised and consistent with general rules.

Whenever possible, record unexpected, unavoidable physical contact with a student—time, place, and circumstance—and report to DSL

## **7. Site security**

### **7.1 All visitors**

All visitors to the school are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school’s safeguarding and health and safety regulations. The head of school will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site. CCTV is installed in all of our campuses and footage for viewing is available only by FIS Administration. Footage will only be shared with external parties if required by law.

### **7.2 Extended school and off-site arrangements**

All extended and off site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on school premises on behalf of the school, the school will check that they have appropriate procedures in place, including safer recruitment procedures.

When students attend off-site activities, including day and residential visits and work-related activities, the school will check that effective child protection arrangements are in place.

## **8. Child protection procedures**

### **8.1 Taking action**

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.

Key points for staff to remember for acting are:

- in an emergency take the action necessary to help the child (including calling 999)
- report your concern as soon as possible to the DSL in person and/or via CPOMS, definitely by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- document the concern
- seek support for yourself if you are distressed

- once reported, staff may no longer be included in the investigation.

### **8.2 If you are concerned about a student's welfare**

There will be occasions when staff may suspect that a student may be at risk. The student's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk and ask how they are feeling or if they can help in any way.

Staff who have access will use CPOMS to record these early concerns. If the student does reveal that they are being harmed, staff should follow this policy. Following an initial conversation with the student, if the member of staff has concerns, they should discuss their concerns with the DSL.

Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

### **8.3 If a student discloses to you**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a student talks to a member of staff about any risks to their safety or wellbeing, the staff member must, at the appropriate time, let the student know that in order to help them they must pass the information on to the DSL. The point at which they tell the student this is a matter for professional judgement. During their conversations with the students, staff should:

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- not be afraid of silences
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the student's mother think about it
- not automatically offer any physical touch as comfort
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean

that they have done something wrong

- tell the student what will happen next
- report verbally to the DSL even if the child has promised to do it by themselves
- Submit the DSL a factual written report without delay. The report will be recorded on CPOMS.
- seek support if they feel distressed.

#### **8.4 Managing allegations of child-on-child abuse**

Staff should report all allegations of child-on-child abuse to the DSL immediately. Such reports will then be investigated and dealt with as follows.

To ensure children can report their concerns easily, the school has systems in place for children to confidently report abuse. This can be through class teachers or significant adults in school, TAs, health assistants, school counsellors etc.

#### **8.5 FIS Committee for Student Situations of Concern**

The school implements the FIS Committee for Student Situations of Concern, The full committee protocol in Appendix 4. This protocol provides a unified and multidisciplinary approach to addressing safeguarding, mental health, behavioral, and academic concerns. Through a committee-based process involving school leadership, the Designated Safeguarding Lead, the Designated Safeguarding Coordinator, and other relevant staff, the protocol ensures timely action, coordinated decision-making, and consistent support for student well-being across all campuses.

#### **8.6 Notifying parents**

The school will normally discuss any concerns about a student with their parents. This must be handled sensitively, and a member of SLT (principal/vice principal) will contact the parent in the event of a concern, suspicion or disclosure. The school acknowledges the sensitive nature of these incidents and will handle these cases with the utmost care. Parents of both victims and perpetrators will be contacted and private face to face meetings will be held, records will be kept and follow up will be timely and discreet. FIS understands that misinformation can arise in such situations and will therefore control, where reasonably possible, the communication to any wider community.

However, our focus is the safety and wellbeing of the student. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, for example if it is believed that the parents are involved in the abuse, advice will first be sought from children's social care and/or the police before parents are contacted.

## **8.7 Confidentiality and sharing information**

All staff should understand that child protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL, DSC, Principals or head of school (*depending on who is the subject of the concern*). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Information sharing will take place in a timely and secure manner and where:

- it is necessary and proportionate to do so; and
- the information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Welfare concern forms and other written information will be stored in CPOMS .

Child protection information will be stored separately from the student's school file and the school file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the student and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a student or parent to see child protection records, they must refer the request to the DSL.

FIS CHART FLOW on Identification and reporting of suspected child abuse on appendix 6

## **8.8 Referral to Social Welfare Department and/ or the policy**

The Designated Safeguarding Leads (DSLs) at FIS provide support to staff in making referrals to the Social Welfare Department (SWD) when there is a concern that a student may be experiencing, or is at risk of experiencing, significant harm. The school is committed to collaborating closely with the SWD on relevant cases to safeguard students' safety and well-being.

In urgent circumstances where a DSL reasonably believes that immediate independent action is required to protect a child, they may contact the police directly without prior parents consultation.

## **8.9 Supporting those involved**

Our staff reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Our staff will never

give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

The support required for the student who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support will also be required for all parties. We will seek to understand why the student acted in this way and consider what support may be required to help the student and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

*This policy creates no binding legal relationship between FIS and any other party, and nothing in this policy shall be interpreted as imposing on FIS a higher standard or duty of care than is imposed by the laws and regulations of Hong Kong. While this policy is intended to ensure the safeguarding and protection of all students at FIS, and FIS uses reasonable efforts to diligently implement and enforce this policy, FIS cannot be held liable for any actions, omissions, or incidents that occur despite these efforts. Nothing in this policy will render FIS liable for any personal injury or death that occurs to a student or any other person.*

## Appendices

**Appendix 1:** [List of Specified Professionals under MRCAO](#)

**Appendix 2:** [Definition of “Serious Harm” under MRCAO](#)

**Appendix 3:** [Categories and Indicators of Abuse](#)

**Appendix 4:** [FIS Committee for Student Situations of Concern Protocol](#)

**Appendix 5:** [Operational Guidelines to Support Transgender Students](#)

**Appendix 6:** [FIS CHART FLOW: Identification and reporting of suspected child abuse](#)