



Chinese International School

Child Protection Policy

保護兒童政策

Original policy: March 2019 | Last revision: May 2025 | Next revision: May 2026

Text in CIS Gold refers to CIS Hangzhou

TABLE OF CONTENTS

I. Introduction	3
II. Expectations for Staff & Volunteers	4
III. Expectations for Parents, Guardians & Other Caregivers	6
IV. Expectations for Visitors	8
V. Expectations for Students	9
VI. Key Roles & Responsibilities	10
VII. Definitions & Indicators of Abuse	13
VIII. Reporting of Incidents, Concerns & Follow-Up Procedures <i>Also note:</i> flowchart	16
Appendix I: Staff & Volunteer Code of Conduct (for HK & HZ) <i>Also note:</i> Printable bilingual (2 pages, two-sided)	22
Appendix II: Visitor Code of Conduct (for HK & HZ) <i>Also note:</i> Printable bilingual (HK) (1 page, two-sided) Printable bilingual (HZ)	22
Appendix III: CIS Hangzhou Visitor Policy <i>Also note:</i> Printable bilingual	22
Appendix IV: Visitor Do's & Don'ts (for HK & HZ Visitor Badges) <i>Also note:</i> Trilingual badge text (English, Traditional & Simplified characters)	22
Appendix V: Peer Abuse Policy <i>Also note:</i> Bilingual text	22
Appendix VI: CIS Disclosure Policy <i>Also note:</i> Bilingual text	22

Appendix VII: Procedures for Managing Allegations Made Against a Member of the CIS Staff or Community (Including Service Vendors)	22
<i>Also note:</i>	
Bilingual text	
Appendix VIII: Self-Harm and Suicidal Ideation School Protocols (HK & HZ)	23
<i>Also note:</i>	
English text (Hong Kong)	
English text (Hangzhou)	
	23
Appendix IX: CIS Safe Touch Policy	
<i>Also note:</i>	
Bilingual text	
Appendix X: Risk Management (HZ)	
<i>Also note:</i>	
English text	

I. INTRODUCTION

Chinese International School (CIS HK & HZ) believes that every child has the right to grow up in a healthy, safe, secure and supportive environment. The school endorses the United Nations Convention on the Rights of the Child (**UNCRC**), which has been ratified by China and the Hong Kong SAR, and seeks to be a positive learning community that promotes well-being, free from hazards and harm. The school adopts a strict zero-tolerance policy for the maltreatment or abuse of children.

Mindful of the special role that schools play as protectors of children and of the harm that can be caused by child abuse, CIS has adopted this Child Protection Policy to ensure that all members of the CIS community understand CIS’s approach to child protection and have clear and helpful guidelines for their behaviour, including measures to prevent and address the specific issue of child abuse, which is defined as including child neglect, physical, emotional/psychological, and sexual abuse.

This policy informs all aspects of the school’s activities and operations, including how staff and other affiliated personnel are selected and asked to conduct themselves and how all learning activities and other programmes are designed and delivered. Initial implementation involved a thorough review of potential risks, new positions of responsibility to anticipate and minimise risks and the introduction of new practices for all community members. Ongoing implementation will involve an annual audit to monitor implementation and continue assessing, identifying, eliminating, or controlling risks in all domains of the school’s activities.

CIS’s child protection programme focuses on prevention but also includes clear steps to be taken when there are concerns that a student has been harmed or is being harmed. CIS uses the term “child protection” to refer both to measures to ensure safety and prevent harm generally and

measures to address specific cases of concern. (Some organisations may use the term “safeguarding” to refer to measures mitigating against potential harm to children, as distinguished from the term “protection” to refer to measures mitigating against harm already experienced by a child.)

In Hong Kong, the Mandatory Reporting of Child Abuse Ordinance mandates certain professionals to report suspected serious child abuse cases to protect children. This law, effective in January 2026, covers professionals in social welfare, education, and healthcare. 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**.

In the event that students experience abuse or neglect in any aspect of their lives, CIS seeks to be a safe haven. The key document addressing the school’s responsibilities in such cases is The Hong Kong Social Welfare Department’s [Protecting Children from Maltreatment – Procedural Guide for Multi-disciplinary Co-operation \(Revised 2020\)](#) and specifically Annex 10: Role of Educational Services and the [Education Bureau’s Circular No. 1/2020 Handling Suspected Cases of Child Maltreatment and Domestic Violence](#), which states that “Protecting children from maltreatment is the collective responsibility of various professionals who may come into contact with children. Effective child protection is built on close co-operation across disciplines”.

Community Support

Families and other community members need to be aware that CIS and its staff will sometimes be required to make a report to the Social Welfare Department, and they are asked to support the school’s decision to do so. In the event that abuse or neglect is suspected to come from a student’s family, the school will identify an approach to help in protecting the student.

Confidentiality

In all instances, the school will maintain confidentiality to the extent appropriate to the student, the student’s family, staff involved in the case, or any other relevant persons.

Inclusivity of All CIS Students

While a child is normally understood to be a person below the age of 18, CIS takes its duty of care for children to encompass all of its currently enrolled students, including those who may have reached or surpassed the age of 18.

CIS will uphold the safety and well-being of all students. As a community, we value, celebrate and safeguard 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.

Elements of This Policy

CIS requires all adults on **either of our campuses** or working with our students on or off campus to understand and uphold CIS’s approach to child protection and safe touch. Expectations are detailed in Sections II-IV. This policy also incorporates **Codes of Conduct (Staff & Volunteer, Internships, External Provider)**, information and education/training to be provided, definitions of abuse, and procedures for reporting concerns. The aim is to provide clear and supportive guidelines to assist our staff, families and other community members in understanding the boundaries between what is

appropriate conduct with regard to students and what behaviours will not be tolerated because they are harmful or potentially harmful.

Please be aware that other aspects of CIS's full programme of child protection may be covered in other policies, procedures or guidelines in the Staff, [Student](#) and [Parent Handbooks](#). All policies of the school are endorsed by CIS's Board of Governors.

II. EXPECTATIONS FOR STAFF & VOLUNTEERS

The school has high expectations with regard to the personal conduct of all adult community members with respect to the care and safety of children.

Staff and volunteers include all individuals:

- **hired to work on CIS's Hong Kong or Hangzhou campuses, including Hangzhou Coach Mentors**
- hired to work with students on or off campus,
- or volunteering to work with students in a supervisory role,

including:

- those in short-term roles (e.g., cover teachers, invigilators or visiting professionals),
- those individually employed,
- employed through a sub-contractor (e.g., some security/maintenance staff, service vendors or camp/trip providers),
- **or living with or employed by staff members residing within the CIS Hangzhou Residential Building (e.g., family members, caregivers, cleaners, etc.)**

Background & Reference Checks

All staff and volunteers are subject to the school's [Background and Reference Check Policy](#). The school's Background and Reference Check Policy ensures that all individuals hired to work on campus, or to work with students on or off campus, or volunteering to work with students 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.

All existing staff will need to have an updated background check every two academic school years.

Recruitment of Socio-emotional Counsellors in school

The school will seek to employ counsellors registered in Hong Kong, for CISHK, with relevant qualifications to fulfill in school roles. Example qualifications could be a diploma or master's in counselling or a masters/ doctorate in psychology. Counsellors in Hong Kong and **Hangzhou** should be members of a relevant professional body.

Child Protection and Safe Touch Responsibilities

It is the responsibility of all staff and volunteers (HK & HZ) to:

- Read, understand and comply with this Child Protection policy and the [Safe Touch Policy](#);

- Comply with the Staff & Volunteer Code of Conduct (see [Appendix I](#));
- Be familiar with the definitions and indicators of abuse (which is defined as including neglect) that are identified in this policy;
- Be ready to make a report as detailed in this policy, if warranted;
- Cooperate fully in any follow-up measures, including investigation;
- 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 prioritise 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;
- Physical restraint is recognised as a serious intervention and should only be used as a last resort. Details regarding this can be found with the [Safe Touch Policy/Physical Restraint Policy](#).

Information, Training & Acceptance of this Code of Conduct

At the time of hiring, all members of staff will be specifically briefed on this policy, including the Staff & Volunteer Code of Conduct; and will be required to acknowledge that they have read, understand and comply with all policies of the school, including the Staff & Volunteer Code of Conduct, which they will sign.

Staff will also receive regular training to ensure their continued readiness to comply with this policy.

If individually employed, they must provide an undertaking that they have read, understand and will comply with the Child Protection Policy and Staff & Volunteer Code of Conduct, as provided by CIS, which they will sign.

If employed through a sub-contractor, the sub-contractor must provide an undertaking that the personnel they employ to work at or with CIS have read, understand and will comply with the Child Protection Policy and Staff & Volunteer Code of Conduct, as provided by CIS, which they will sign.

Responsibilities of Volunteers and of Staff Overseeing Volunteers

It is the responsibility of all staff overseeing volunteers to ensure that, prior to performing a volunteer role, all volunteers with roles involving the supervision of students (e.g., trip chaperones, event monitors, etc.):

- understand their roles;
- understand the school's approach to child protection;
- complete an undertaking attesting that they have not committed any criminal offence and have no sexual criminal conviction record;
- understand, comply with and sign the Staff & Volunteer Code of Conduct (see [Appendix I](#)).

The above measures for volunteers apply to all volunteers with roles involving the supervision of students, irrespective of whether the volunteers may be former staff, current or former CIS parents or alumni, or bear any other prior relationship to the school.

Volunteers performing roles that do not involve the supervision of students (e.g., CISPTA General Committee, Alumni Board, Annual Fund Advocates, Phoenix Sports Club etc.) are not required to complete the above undertaking, but should still understand the school's approach to child protection, uphold and sign the Staff & Volunteer Code of Conduct (see [Appendix I](#)), Visitor Code of Conduct (see [Appendix II](#)), and **CIS Hangzhou Visitor Policy & Code of Conduct** (see [Appendix II & III](#)).

Disciplinary Action & Other Consequences

Individuals who engage in conduct that is inappropriate, harmful, potentially harmful or in any other way incompatible with the [Staff & Volunteer Code of Conduct](#) will be personally liable for their acts. This may involve disciplinary proceedings, which, depending on the seriousness of the misconduct, may result in summary dismissal. It may also result in civil liability and, in certain circumstances, criminal consequences. Incidents involving harm to or neglect of, or potential harm to or neglect of, students can constitute gross misconduct, which may result in summary dismissal of staff.

Paid Leave/Suspension

In the event of an investigation, the school may place any member of staff involved on paid leave and/or suspension on full pay and benefits should the school deem this necessary.

The school reserves the right to report any complaint to the police or other authorities of Hong Kong, **Hangzhou**, or other relevant jurisdictions, in which case the perpetrator may be subject to sanctions arising from criminal offences. The perpetrator may also be held liable in civil actions under relevant legislation or in separate legal actions.

III. EXPECTATIONS FOR PARENTS, GUARDIANS & CAREGIVERS

The school has the highest expectations with regard to the personal conduct of all adult community members with respect to the care and safety of children.

Parents

- Parents are reminded of the school's requirement that **at least one parent/guardian be in full-time residence in Hong Kong with the student**. 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.
- Parents are also reminded of the requirements to 1) 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 2) **supply Temporary Guardian information** every time that both/all parent/guardian(s) of a student are absent from Hong Kong; this should include: a. dates of parent/guardian absence, b. contact details of a Temporary Guardian, and c. signed acknowledgement by the Temporary Guardian.
- When a family joins CIS, parents will be asked to familiarise themselves with the school's policies and procedures and to acknowledge that they have read, understand and will uphold them. Special reference will be made to this Child Protection Policy and parents' specific responsibilities with regard to the school's approach to child protection.

- Annually, at the time of re-enrollment, parents will be asked to acknowledge that they have read, understand and will uphold the Child Protection Policy and other school policies and procedures, including the Visitor Code of Conduct (see [Appendix II](#)) and **CIS Hangzhou Visitor Policy & Code of Conduct (see [Appendix II & III](#))** (Parents will be offered annually updated information to help them understand the school's policies and procedures.)
- It is the responsibility of parents to ensure that they brief any household staff, temporary guardians, or other caregivers involved in the care of CIS students and/or regularly coming to campus about CIS's approach to child protection. Such persons will be expected to understand and uphold the Visitor Code of Conduct (see [Appendix II](#)) and **CIS Hangzhou Visitor Policy & Code of Conduct (see [Appendix II & III](#))**.
- **Parents are reminded that they or another formally designated adult will be required to meet students returning from CIS Hangzhou or other school travel at designated pick-up points, such as the airport or school, rather than allowing children to return home on their own. Requirements will be specified in Hangzhou CIS or trip information.**
- Parents are reminded of the requirement to disclose to the school any information that may affect the student's school experience, including but not limited to medical conditions and learning, behavioural, psychological or emotional needs or concerns. Parents should keep their children's school directory profiles up to date and also promptly communicate with the Homeroom teacher/Advisor/Head of House, school nurse, school counsellor or other relevant member of staff any changes, especially in advance of a trip.
- Failure to meet either of these requirements will require discussion with the school about the student's future enrollment status at CIS.
- Families and other community members need to be aware that CIS and its staff will sometimes be required to make a report to the Social Welfare Department, and they are asked to support the school's decision to do so.
- In the event that abuse or neglect is suspected to come from the student's family, the school will identify an approach to help in protecting the student.

Household Staff, Temporary Guardians, or Other Caregivers

- It is the responsibility of parents to ensure that they brief any household staff, temporary guardians, or other caregivers involved in the care of CIS students and/or regularly coming to campus about CIS's approach to child protection. Such persons will be expected to understand and uphold the Visitor Code of Conduct (see [Appendix II](#)) and **CIS Hangzhou Visitor Policy & Code of Conduct (see [Appendix II & III](#))**.

Social Media and Chat Groups

Parents must observe the [school's guidelines](#) for school-endorsed class/house parent chat groups, which have been developed with child protection in mind.

These guidelines state that:

- Only group photos should be posted; individual and close-up photos should not be posted.
- Students appearing in photos posted should not be identified by name.
- Photos posted in such chat groups should not be further shared on other social media or otherwise shared with the public.

Please note that guidelines for posts on the school's own social media platforms are that posts must be constructive and serve to illustrate key aspects of student learning, school life or school values. Posts should not identify the full names of students, but may use first names and year levels (or in the case of posts in Chinese, may use surnames and year levels).

- Because social media platforms, their features, and the social norms around their use are subject to rapid change, parents are reminded to be sensitive and responsible in their use of all social media, including non-school endorsed platforms; make sure their privacy settings are set appropriately; and be vigilant so as not to inappropriately share photos and personal details of other people's children, as well as their own children.
 - [Primary Class Parent Guidelines](#)
 - [WhatsApp Guidelines](#)
-

IV. EXPECTATIONS FOR VISITORS

- A Visitor Code of Conduct and **CIS Hangzhou Visitor Policy & Code of Conduct** follow in [Appendices II & III](#). All visitors are asked upon arrival to read, sign and uphold the Visitor Code of Conduct in order to ensure student safety and protection.
 - "Visitor Do's & Dont's" are also displayed at school entrances and appear on visitor badges as reminders to visitors.
-

V. EXPECTATIONS FOR STUDENTS

Students are expected to treat each other with courtesy and respect, and bullying is not tolerated.

For expectations, as well as procedures when expectations are not met, see these sections of the Parent Handbook for policies relating to Primary students:

- [Primary Behaviour Policy](#);
- [Secondary Behavioural Policy](#);
- [Technology Responsible Use Agreement \(Primary\)](#);
- [Technology Responsible Use Policy \(Secondary\)](#);

and these sections of the CIS Student Handbook ([Hong Kong](#), [Hangzhou](#)) for policies relating to Secondary students:

- [Attendance and Punctuality](#);
 - [Behaviour Policy](#);
-

- [Anti-Bullying Policy](#);
- [Peer Abuse Policy](#);
- [Technology Responsible Use Policy](#).

These expectations apply equally to CIS Hangzhou students. CIS Hangzhou also has additional expectations of students that take into consideration the residential setting. Please see the [CIS Hangzhou Student and Parent Handbooks](#).

- Students receive regular instruction and guidance in a variety of settings about appropriate behaviour among students and between students and other community members.
- With specific regard to child protection, the school provides students at every year level age-appropriate lessons so that they understand their needs, rights and responsibilities with regard to personal safeguarding. Lessons also inform students of who they may speak to at school should they have concerns about their own situation or that of other students.
- The school's expectations for students and the school's child protection measures also apply when students are engaged in activities and trips off campus. Measures to assess and minimise risk (please see Risk Assessment and Risk Management [[Hong Kong](#), [Hangzhou](#)]) are a required element of the planning of all trips, in and outside of Hong Kong.

Disciplinary Action & Other Consequences

Students who engage in conduct that is inappropriate, harmful, potentially harmful or in any other way incompatible with the Student Handbook will be subject to sanctions as outlined in the above documents ([Peer Abuse Policy](#) and Behaviour Policy [[Hong Kong](#), [Hangzhou](#)]).

Subject to law and the circumstances, the school may be required to inform the police or other authorities of Hong Kong, Hangzhou, or other relevant jurisdictions. In all cases, strict confidentiality will be maintained to the extent appropriate.

Student Sexual Behaviour

CIS recognises that sexuality is a normal part of human nature. Learning about this aspect of human nature is a normal part of childhood and adolescence, and age-appropriate education will be provided.

At the same time, the school takes the view that community members have the right to expect that school premises and school activities will be free of sexual behaviours. For this reason, CIS adopts a strict zero tolerance policy to sexual activity and/or physically intimate activity on the school's campuses and during school activities. Sexual activity and/or physically intimate activity is understood to cover a range of behaviours, including non-touch behaviours such as sexting or other online or offline behaviours.

If students are found to have engaged in sexual activity and/or physically intimate activity, because of the variables involved, the school will review the situation on a case-by-case basis and respond with an action plan that addresses behaviours of concern, physical and emotional/psychological effects, and disciplinary consequences.

In some cases, the school's response may also involve determining if sexual activity and/or physically intimate activity is inappropriate sexual behaviour or abuse. It should be noted that sexual behaviour involving a student or students will be considered abuse if it occurs without the consent or understanding of one party, as a result of coercion, or with a difference in age, responsibility, trust or power between the parties. **At CIS Hangzhou, the Red Rules apply.**

VI. KEY ROLES, RESPONSIBILITIES & TRAINING

Training

All staff and volunteers, including members of the Board of Governors, are required to undergo basic-level training in child protection that must be refreshed annually.

- New staff will receive an induction briefing and materials until such time in the school year when they can undergo full basic-level training.
- Members of the school's Leadership Team and Child Protection Officers are required to undergo advanced-level training in child protection that must be refreshed every two 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.

Board of Governors

- Endorses this policy as part of the full Policy Handbook and holds oversight over the school's child protection programme.
- In both Hong Kong and **Hangzhou**, the Chair and Vice Chair are designated to lead the Board's oversight measures for child protection and serve as points of contact with the school leadership on such matters.
- In both Hong Kong and **Hangzhou**, the Chair and Vice Chair are the designated contact persons in the event that concerns arise involving the Head of School.
- In their individual capacities, Board members adhere to the Staff & Volunteer Code of Conduct in both Hong Kong and **Hangzhou**.

Current office holders:

- ***Andrew Brandler, Chair***
- ***Venantius Tan, Vice Chair***

Head of School, Deputy Head of School, Heads of Primary or Secondary, or Director and Deputy Director of CIS Hangzhou

- Serve as leaders of the school's child protection programme, including this policy.

- Appoint CPO(s).
- Appoint Child Protection Response Team, as necessary.
- Ensure that the procedures outlined in this policy are followed appropriately and fairly in the interests of students and in accordance with Hong Kong law and Social Welfare Department guidelines, or the laws of **Hangzhou** or other relevant jurisdictions.

Current office holders:

- **Sean Lynch, Head of School**
- **Li Bin, Deputy Head of School**
- **Anne Gardon, Head of Primary**
- **Christine Doleman, Head of Secondary**
- **Sally Zhang, Director of CIS Hangzhou**

Child Protection Officer(s) (CPOs)

Separate CPOs are appointed for Primary, Secondary and CIS Hangzhou, and two of these persons will also be designated as Lead and Deputy CPO for the whole school.

- Act as first-line responders to whom concerns regarding harm to a student are reported.
- Serve as coordinator of a Child Protection Response Team, if appropriate.

The Lead CPO also holds these responsibilities:

- Manages any liaison with the Social Welfare Department or other relevant authorities.
- Coordinates implementation of this policy.
- Ensures regular training for the various stakeholder groups covered in this policy.
- Maintains all confidential CP records for CIS Hong Kong and **Hangzhou** students.

The CPO for CIS Hangzhou will hold these responsibilities:

- Manages, along with the Director of CIS Hangzhou, any liaison with relevant local authorities.
- Maintains all confidential CP records for CIS Hangzhou students.

Current office holders:

- **Alissa Kordprom, Lead CPO & CPO for Secondary (Room 331, ext. 982)**
- **Tracy Hayes-Williams, Head of Student Life & Administrative Services (Primary) - Deputy CPO & CPO for Primary (Room 250, ext. 250)**
- **Brian Mulcahy, Deputy Head of Secondary, Director of Student Life (Secondary) - Deputy CPO Secondary (Room 331B, Ext 977)**
- **Chris Gibbs, Deputy Director of CIS Hangzhou - Deputy CPO & CPO for CIS Hangzhou (Room 304 or 3rd Floor Staff Room, Academic Bldg, ext 1110)**
- **Teck Wee, Head of House - Deputy CPO for CIS Hangzhou**

Additional Responders

These will include all other counsellors not appointed as CPOs above and other persons who may be designated to serve in this role.

- Act as first-line responders to whom concerns regarding harm to a student are reported.
- Serve as coordinator of the Child Protection Response Team, if appropriate.

Current office holders:

- **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**
- **Adrian Huen, Director of Finance & Business Administration**
- **Ebru Kublay, Counsellor, CIS Hangzhou**

Responders for Concerns Involving Staff

- The Deputy Head of School, Director of Finance & Business Administration, Director of Community Relations, and **Director and Deputy Director of CIS Hangzhou** will act as first-line responders to whom concerns involving a member of staff are reported.
- Maintain confidential child protection records relating to staff cases.

Current office holders:

- **Li Bin, Deputy Head of School**
- **Adrian Huen, Director of Finance & Business Administration**
- **Catherine Han, Executive Director of Community Relations**
- **Sally Zhang, Director of CIS Hangzhou**

Child Protection Response Team

- Coordinates initial fact-finding in the event of cases of concern.
- Supervises follow-up actions and ongoing support to students, families or staff, as necessary.

Counsellors

The CIS counsellors will respond when there is a concern regarding suicidal ideation from a student. They will follow specific guidelines (See Appendix VIII [[Hong Kong](#), [Hangzhou](#)]).

Child Protection Committee

- Is comprised of staff members from across the school.
- Meets monthly to review all aspects of the Child Protection programme, ensure compliance with the school's CP policy and current best practice, and implement modifications as necessary.
- Annually reviews and updates this policy and the various Codes of Conduct.

Current members:

- **Li Bin, Deputy Head of School**
- **Anne Gardon, Head of Primary**
- **Tracy Hayes-Williams, Head of Primary Student Life & Administrative Services**
- **Christine Doleman, Head of Secondary**

- *Jennifer Sohn-Halliday, Deputy Head of Secondary, Director of Secondary Administrative Services*
 - *Brian Mulcahy, Deputy Head of Secondary, Director of Secondary Student Life*
 - *Alissa Kordprom, Lead CPO & CPO for Secondary*
 - *Amy Colfelt, Primary Counsellor*
 - *Monica Chang, Secondary Counsellor*
 - *Jamie Li, Primary Counsellor*
 - *Adrian Huen, Director, Finance & Business Administration*
 - *Jerry Szombathy, Director of Operations, Head of Administrative Services*
 - *Allan Fraser - Director of Sports & Activities*
-

VII. DEFINITIONS & INDICATORS OF ABUSE

All staff and volunteers should familiarise themselves with the following definitions of what constitutes abuse and typical indicators, and they should be vigilant and prepared to make a report to the CPO and/or a counsellor if they believe there is reason for concern. Staff are not expected to make a judgement about whether their concerns may or may not ultimately constitute abuse.

It should be noted that children who experience abuse will respond differently and some children will be more vulnerable than others. Children with special educational needs or with disabilities may face additional challenges. Special care and follow-up to support both victims and perpetrators will be required in the event of cases of peer abuse.

Broad Definition

Child abuse is 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, organisational form) are in a position of differential power that renders a child vulnerable. (Note: CIS takes its duty of care to extend to all of its currently enrolled students, regardless of age and including those who may have reached or surpassed the age of 18.)

Child abuse is not limited to a child-parent/guardian situation, but may involve anyone entrusted with the care and control of a child -- e.g., child-minders, relatives, teachers, coaches, etc. Abuse may also be committed by a person unknown to a child, although it should be noted that perpetrators tend not to be strangers.

The school 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.

Types of Abuse

There are four main areas of child abuse, as outlined below.

It should be noted that some of the indicators listed below may be signs of problems other than abuse, and the advice of school counsellors or other trained professionals along with additional

information will normally be required. Definitions of abuse can be complex and may also involve culturally-specific child-rearing behaviours, gender and role responsibilities, and expectations.

1. Neglect/Affluent Neglect

Neglect/Affluent Neglect refers to a severe or repeated pattern of lack of attention to a child's basic needs, including nutrition and growth, supervision and safety, hygiene, health and medical follow-up, education, development and emotional well-being that endangers or impairs the child's health or development.

Possible indicators of neglect/affluent neglect:

- Physical indicators include:
- Malnutrition, underweight or frail or significant and abnormal weight loss or gain over a period of time.
- Hygiene or health problems such as illness are unattended, medical treatment or needs are ignored, a child is forbidden to receive vaccinations without sound reasons, and the child is persistently dirty, wearing shabby clothing, or lacking adequate or weather-appropriate clothing.

Environmental indicators include:

- 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.

Emotional & behavioural indicators:

A child appears dull, shows signs of developmental delay or regression, abnormal behaviour and emotional problems such as being restless, depressed, lacking social interaction with carers or others, expressing hunger, and getting involved in criminal or sexual activities due to inadequate supervision. 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, is depressed or emotionally unstable.

2. Physical Abuse

Physical abuse is any non-accidental injury where adults physically hurt, injure or kill a child. This may involve hitting, shaking, squeezing, burning, hair-pulling, attempted suffocation or drowning, giving a child poisonous substances or inappropriate drugs or alcohol, holding a child against his or her will, extreme physical discipline, disfigurement or other cruel or inhumane acts, disregard for a child's pain and/or mental suffering, as well as failure to take reasonable steps to prevent the occurrence of any of the above.

Possible indicators of physical abuse:

- Non-accidental harm such as bruises, welts, lacerations, abrasions, burns, scalds, internal injuries and poisoning.
- If the explanation given by carers is unconvincing, contradicting to or inconsistent with the

injury, failure or delay in seeking medical attention for the child's injury if the child wears excessive clothing to cover the body. The child might appear distant or fearful in the presence of a carer.

3. 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.

Sexual abuse has characteristics that differ from other forms of child abuse and warrant special attention. While physical abuse is often the result of immediate stress and not usually planned, sexual abuse usually requires planning with results that are more harmful. The planning, referred to as “grooming”, often results in victims accepting the blame, responsibility, guilt and shame for the sexual behaviour of the offender. Sexual abuse requires far more secrecy than other forms of child abuse and so is more difficult to detect.

Possible indicators of sexual abuse:

Physical:

- Pregnancy, STDs, bruises, bleeding, lacerations, swelling or pain in the genital areas, discharge or weakened bowel and bladder control.

Emotional and Behavioural indicators:

- The child exhibits sexual knowledge or behaviour beyond what is expected for age, enacts or reproduces scenes of sexual abuse during play or in daily behaviour, shows particular interest in adults' genitalia or repeatedly touches adults' sensitive body parts, discloses that the parent or other person has played secret games, has a hypersensitive reaction to being touched or manifests other emotional or behavioural problems, such as changes in daily behaviour and emotions, displays with anxiety or depressed mood, becomes easily withdrawn or agitated, has sleeping and diet problems, regression in development or learning.

It should be noted that many victims, 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.

For student-to-student cases, please see Expectations for Students above.

4. Psychological/Emotional Abuse

Psychological/Emotional abuse refers to a repeated pattern of behaviour 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.

Physical indicators of Psychological/Emotional abuse:

- The child is underweight or frail, exhibiting developmental delay or regression, having eating disorders, presenting sleep problems or psychosomatic symptoms resulting in physical

discomfort or symptoms such as headaches, tummy aches, vomiting, and skin allergies.

Emotional & Behavioural indicators:

- Resistance to contact with others and the outside world, lacking self-confidence or having low self-esteem, having difficulty building trust with others and displaying signs of anxiety or depressed mood, exhibiting self-harm or suicidal thoughts or attempts.
- The carer may be unresponsive to the child emotionally or give inappropriate responses, being detached or indifferent to the child, treating the child badly, humiliating criticism, being unpredictable or exposing the child to horrific or violent situations, uses violence in on family members in front of the child, or unreasonably restraining the child from normal social life.

VIII. REPORTING OF INCIDENTS, CONCERNS & FOLLOW-UP PROCEDURES

The Responsibility to Report

All staff are expected to raise their concerns, no matter how small. What may seem like a minor matter by itself may represent a more serious concern together with other information known to the CPO. Members of staff will not be expected to respond to concerns alone or to make a judgment about whether abuse has taken place, but they are expected to raise their concerns, report any indicators of abuse as identified in this policy that they may have encountered, or other information giving reasonable cause.

It should be noted that individual cases may vary significantly from one another, and no single reporting and handling protocol is likely to address all of the circumstances of a particular case.

Reporting Possible Harm to a Student

Concerns should be reported to one of the CPOs or Additional Responders (see Key Roles & Responsibilities).

Reporting Possible Misconduct by a Member of Staff

If concerns involve another member of staff, the report should be made to the staff designated as first-line responders for such cases -- the Deputy Head of School and/or the Director of Finance and Business Administration and/or the Director of Community Relations -- or relevant Head of Primary/Secondary or **Director/Deputy Director of CIS Hangzhou**. If concerns involve the Head of School, the report should be made to the designated members of the Board of Governors, who as noted above are the Chair & Vice Chair.

Names of specific individuals may be found, above, in “Key Roles & Responsibilities”.

Protection for Members of Staff Making A Report

In accordance with the school’s Disclosure Policy, the school will take reasonable steps to protect from victimisation or retaliation in connection with their involvement in making a report any staff member who makes a report in good faith. The school will not tolerate any behaviour whereby a member of staff victimises another person because he/she files a report, is about to file a report or is otherwise involved in a report (e.g., as a witness) relating to an allegation of harm to a student.

Victimisation in any form will be subject to disciplinary action and may result in termination. All documentation of the investigation will be kept in hard copy in a locked safe in the Head of School's office, and will not be kept digitally or in an individual staff member's file.

Step I: Initial Fact-Finding & Response Team

When a student reports abuse about another student to a staff member or there is reasonable cause to believe that abuse is occurring, the relevant staff member should immediately make a report.

All reports should include a written statement using this form: [Child Protection Reporting Form](#)

The CPO will:

1. Secure the immediate physical safety of the student, if that is a concern.
2. Report the case to the relevant Head of Primary/Secondary or **Director/Deputy Director of CIS Hangzhou**.
3. Take initial steps to gather information regarding the report.
4. Form a school-based Child Protection Response Team, as needed, to address the report.

When a report concerns a member of staff, the designated first-responder receiving the report will take the steps listed above, in lieu of the CPO, and relevant Head of Primary/Secondary or **Director/Deputy Director of CIS Hangzhou** will serve as coordinator of the Child Protection Response Team.

For cases involving students of **CIS Hangzhou**, **Step 1 will involve the CPO for CIS Hangzhou reporting to the Lead CPO. Should reporting to authorities be deemed appropriate, reporting will be to Hong Kong authorities as outlined in the Protecting Children from Maltreatment – Procedural Guide for Multi-disciplinary Co-operation (Revised 2020) of the Hong Kong Social Welfare Department and the Education Bureau's Circular No. 1/2020 Handling Suspected Cases of Child Maltreatment and Domestic Violence.**

The Child Protection Response Team will include:

- the relevant CPO(s),
- relevant Head of Primary/Secondary
- the relevant school counsellor,

and may include:

- Head of School,
- Deputy Head of School,
- School nurse,
- Secondary Head of Year,
- **CIS Hangzhou Head of House**,
- or other individuals who the relevant Head(s) of School deems appropriate.

A CPO will normally serve as overall coordinator of the Child Protection Response Team.

- The Child Protection Response Team will be responsible for initial 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 under Steps 2 & 3, if deemed necessary.

Step 2: Action Plan

Based on the initial fact-finding, a plan of action will be developed to assist the student and family. Possible actions that may take place are:

- Discussions between the student and CPO (or counsellor, as appropriate), using age-appropriate strategies, in order to gain more information.
- In-class or other on-campus observations of the student by an appropriate teacher, counsellor, or administrator.
- Meetings with the family to present the school's concerns.
- Referral of the student and family to an external professional counsellor or relevant specialist in Hong Kong or **Hangzhou**. In some situations, it is important that the student is supported by a Mental health professional external to the school. The school will not recommend such a professional (Psychologist or counsellor) unless they are confident that the said professional has appropriate qualifications and has membership of a relevant professional body.
- Consultation with the relevant officer of the Hong Kong Social Welfare Department (SWD staff can provide advice, especially in cases where there are doubts as to whether or not to make a formal report).
- Consultation with legal counsel, as appropriate.
- Consultation with other local authorities, as appropriate.

In general, most cases that are determined to involve the following issues will be handled in-house by school counsellors and/or CPOs:

- Student relationships with peers.
- Parenting skills related to disciplining children at home.
- Student-parent relationships.
- Mental health issues such as anxiety, low self-esteem or grieving.

Cases that are determined to involve the following issues will typically be referred to outside specialists:

- Mental health issues such as depression, psychosis, dissociation or suicide ideation.

Cases that are determined to involve the following issues will always be reported to the Social

Welfare Department for investigation and may also be referred to other outside specialists:

- Severe and ongoing physical abuse,
- Sexual abuse and incest.

In extreme cases, when abuse is ongoing or concerns remain about the safety of a student, reports may be made to:

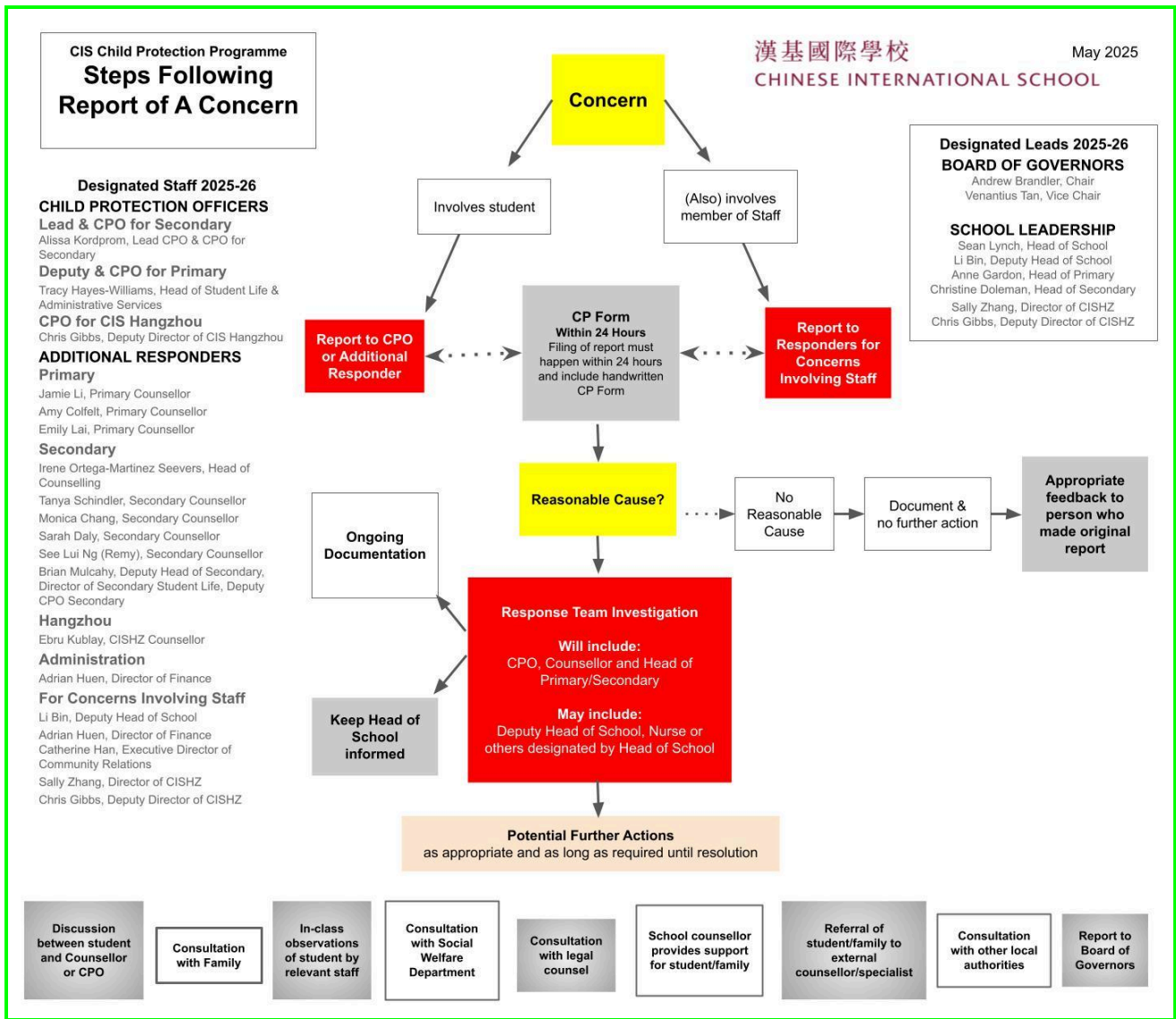
- The Social Welfare Department.
- The Hong Kong Police.
- The Education Bureau.
- Other relevant authorities.
- Authorities of other relevant jurisdictions, including but not limited to **Hangzhou**.
- Further information can be found in the [Child Protection Protocols for CPOs and Counsellors](#)

Step 3: Ongoing Support

Subsequent to a reported and/or substantiated case of child abuse, the CPO and/or counsellor will:

- Maintain contact with the student and family to provide appropriate support and guidance.
- Provide the student's teachers and relevant Head(s) of School with ongoing support.
- Provide resource materials and strategies for teacher use.
- Maintain contact with any outside therapists to update them on the progress of the student in school.
- Maintain contact with the Social Welfare Department or other relevant authorities, as appropriate.

[see Flowchart on next page]



Please click the links to view the following important Appendices, which are an integral part of the CIS Child Protection programme.

APPENDIX I: STAFF & VOLUNTEER CODE OF CONDUCT (HK & HZ)

This document must be read, signed and observed by all CIS staff and volunteers.

Statement Date: **March 2019**

Latest Revision Date: **May 2025**

Next Review Date: **May 2026**

[Printable bilingual](#) (2 pages, two-sided)

APPENDIX II: VISITOR CODE OF CONDUCT (HK & HZ)

This document must be read, signed and observed by all visitors to CIS's campuses.

Statement Date: **March 2019**

Latest Review Date: **May 2025**
Next Review Date: **May 2026**
[Printable bilingual \(HK\)](#) (1 page, two-sided)
[Printable bilingual \(HZ\)](#)

APPENDIX III: CIS Hangzhou VISITOR POLICY

This document must be read, signed and observed by all visitors to CIS Hangzhou.

Statement Date: **March 2019**
Latest Review Date: **May 2025**
Next Review Date: **May 2026**
[Printable bilingual](#) (2 pages, two-sided)

APPENDIX IV: VISITOR DO'S & DON'TS (FOR HONG KONG & HANGZHOU VISITOR BADGES)

This wording summarises the Visitor Code of Conduct.

Statement Date: **March 2019**
Latest Review Date: **May 2025**
Next Review Date: **May 2026**
[Trilingual version for reference](#)

APPENDIX V: PEER ABUSE POLICY

This document summarises the Peer Abuse Policy.

Statement Date: **December 2020**
Latest Review Date: **May 2025**
Next Review Date: **May 2026**
[Bilingual version for reference](#)

APPENDIX VI: CIS DISCLOSURE POLICY

This document summarises the CIS Disclosure Policy.

Statement Date: **December 2020**
Latest Review Date: **May 2025**
Next Review Date: **May 2026**
[Bilingual version for reference](#)

APPENDIX VII: PROCEDURES FOR MANAGING CHILD PROTECTION ALLEGATIONS MADE AGAINST A MEMBER OF THE CIS STAFF OR COMMUNITY (INCLUDING SERVICE VENDORS)

This document summarises the Procedures for Managing Child Protection Allegations.

Statement Date: **December 2020**

Latest Review Date: **December 2020**

Next Review Date: **December 2024**

[Bilingual version for reference](#)

Appendix VIII: SELF-HARM AND SUICIDAL IDEATION SCHOOL PROCEDURE (HONG KONG & HANGZHOU)

This document summarises the Self-Harm and Suicidal Ideation School Procedure..

Statement Date: **May 2021**

Next Review Date: **May 2026**

[English text \(Hong Kong\)](#)

[English text \(Hangzhou\)](#)

APPENDIX IX: CIS SAFE TOUCH POLICY

This document summarises the CIS Safe Touch Policy.

Statement Date: **May 2021**

Next Review Date: **May 2026**

[Bilingual version for reference](#)

APPENDIX X: RISK MANAGEMENT (HANGZHOU)

This document summarises the Risk Management Policy for CIS Hangzhou.

Statement Date: **May 2025**

Next Review Date: **May 2026**

[English version for reference](#)