

Safeguarding and Child Protection

SFG001

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SAFEGUARDING

NLCS Hong Kong is committed to safeguarding and promoting the welfare of children and young people. The School expects all teaching staff, support staff and volunteers to share and uphold this commitment. If a child cannot feel safe, they cannot learn to their full potential.

SCHOOL AIMS

NLCS Hong Kong's Safeguarding and Child Protection policy and procedures are one way in which the School meets the following School Aims:

- To create a home where individuals are nurtured and the whole personality can grow.
- To ensure that every member of the School feels valued, supported and encouraged.
- To foster a community built on positive relationships between staff and students, and between the students themselves.
- To encourage students to embrace new challenges confidently, and to respond to setbacks in a resilient and determined manner.
- To develop an outward looking, internationally minded community that promotes respect and compassion, service to others and active, positive participation in society and the wider world.

PURPOSE

The Policy focuses on:

- Ensuring that all staff understand their responsibilities with regard to safeguarding children
- Ensuring that all staff know how to report a concern
- Informing staff of the potential signs and symptoms of abuse

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1. SAFEGUARDING POLICY & FRAMEWORK

The Safeguarding Policy includes the School's Child Protection Policy in full and references all other policies and procedures that relate to safeguarding. In total, this policy, together with elements of other school policies, constitute the School's Safeguarding Framework.

1.1 Statement of Intent

Our School is committed to safeguarding and promoting the welfare of children and young people. The School expects all teaching staff, support staff, externally contracted staff, peripatetic staff, sports coaches and volunteers to share and uphold this commitment. If a child cannot feel safe, they cannot learn to their full potential.

The safeguarding and welfare of students is of fundamental importance to the School. The School defines safeguarding and promoting the welfare of children as protecting children from maltreatment; preventing impairment of children's health or development; ensuring 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.

This policy can be made available in Mandarin, large print or other accessible format if required and should be read in conjunction with the following:

Pastoral:

Behaviour Policy including anti-bullying and anti-racism
Inclusion Policy

Missing Students and Students Leaving School Site Standard Operating Procedure
Attendance and Punctuality Policy

Information and Communication Technology:

Digital Safety Agreement (Students)
Digital Safety Agreement (Staff)
Digital Safety Policy
ICT Policy Staff Procedures and Guidelines
Responsible AI Policy
Social Media Policy

Human Resources:

Staff Code of Conduct (including safeguarding)
Safer Recruitment, Selection & Disclosure Policy
Procedure for Reporting a Wrongdoing and Managing Allegations Against Staff
Volunteering Policy
Data Protection Policy
Equality, Diversity and Inclusion Policy

Health and Safety:

Emergency Evacuation Policy and Procedures
Trips & Visits Policy
Visitor Policy
Events Policy
CCTV Policy

Admissions and Marketing:

Admissions Policy
Terms and Conditions
Communications Policy
Complaints Procedure

1.2 Management of Safeguarding

The Governors of the School accept full responsibility for safeguarding within the School. They constantly monitor the effectiveness of the implementation of this Policy and revise it where necessary. The Governors ensure any changes in this Policy are drawn to the attention of all staff.

The Designated Safeguarding Lead's responsibility is to maintain an overview of safeguarding within the School; open channels of communication with local statutory agencies; support staff in carrying out safeguarding duties; encourage a culture of listening to students; and monitor the effectiveness of policies and procedures in practice. Details of the School's Designated Safeguarding Lead are set out in Appendix 1. Further information about the Designated Safeguarding Lead's responsibilities can be found on page 10.

2. CHILD PROTECTION POLICY

Keeping our students safe from harm is of fundamental importance to us as a school. There is, therefore, a need for procedures that prevent and detect abuse.

Hong Kong is a signatory to the UN Convention on the Rights of the Child (UNCRC) since 1994 and the Government established the Commission on Children in 2018. The Commission is committed to 'providing a safe and nourishing environment for the healthy and happy growth and optimal development of our children so as to achieve their fullest potential.' The Protection of Children and Juveniles Ordinance (PCJO) is a key ordinance in the protection of children and juveniles, and states that 'the best interests of the child shall be a primary consideration.' Offences Against the Person Ordinance (OAPo) contains a number of offences relating to the unlawful use of force and offences specifically relating to the children and young persons.

We also follow good practice as set out in the UK government guidance Keeping Children Safe in Education, KCSIE 2023, 2024 and 2025.

This document sets out the responsibilities and duties of everyone at NLCS Hong Kong who comes into contact with children and their families to ensure our children are protected from harm.

3. AIMS AND OBJECTIVES

3.1 The aims of this policy are:

- To provide all staff with the necessary information to enable them to meet their responsibilities to promote and safeguard the emotional and physical well-being of children.
- To ensure consistent good practice across the School.
- To demonstrate the School's commitment with regard to safeguarding children.

3.2 The objectives of this policy are:

- To have clear guidelines for staff for identifying and reporting cases, or suspected cases, of abuse including neglect, physical abuse, emotional abuse and sexual abuse.
- To provide a positive, supportive and secure environment where students know there are adults in school whom they can approach if they need help.
- To support students who may have been abused, by engendering self-esteem through the PSHE programme and through the use and availability of the counselling department.

4. SCOPE

This policy is addressed to all members of staff, both national and international, volunteers, partners, contractors, consultants, Board members, guests and visitors (including parents).

The policy covers arrangements for the Junior and Senior School. It applies wherever staff or volunteers are working with children, even when this is away from the School, for example on a trip.

5. DEFINITIONS

5.1 Safeguarding

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. It means protecting children from abuse and maltreatment, preventing harm to children's health or development, ensuring children grow up with the provision of safe and effective care and taking action to enable all children and young people to have the best outcomes.

5.2 Child Protection

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering, or likely to suffer, significant harm. This includes child protection procedures, detailing how to respond to concerns about a child.

5.3 Definition of the Child

The UN defines a child as the following;

‘Definition of the child (Article 1): The Convention defines a ‘child’ as a person below the age of 18, unless the laws of a particular country set the legal age for adulthood younger. The Committee on the Rights of the Child, the monitoring body for the Convention, has encouraged States to review the age of majority if it is set below 18 and to increase the level of protection for all children under 18.’ (UNICEF)

As a School we have some students who may be 19 and therefore define a child to be any student of the School. However, when considering Child Protection Law in making referrals, we take guidance from the Family and Child Protective Services Unit (FCPSU) of the Social Welfare Department (SWD) on age-related situations.

5.4 Definition of Child Abuse

We recognise that child abuse can be categorised into one of four main areas. These are; physical abuse, sexual abuse, emotional abuse and neglect. It is the maltreatment of a child and, whilst it may be caused through direct action, it can also be indirect and through failure to act to prevent harm.

Our definitions have been taken from guidance from the National Society for the Prevention of Cruelty to Children (NSPCC, 2009) and Working Together to Safeguard Children (Statutory Guidance 2023). Child abuse is ‘any action by another person - adult or child - that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse’.

Further details of types of abuse and recognising abuse are detailed in Appendix 3.

5.5 Definition of Early Help

The School and all its staff form part of the wider safeguarding system for children. Safeguarding and promoting the welfare of children is everyone’s responsibility. To fulfil this responsibility effectively, all professionals should adopt a child-centred approach and consider, at all times, what is in the best interests of the child.

All school staff should be prepared to identify children who may benefit from early help; this means providing support as soon as a problem emerges at any point in a child’s life, from Grade 1 to Grade 12, in order to promote a child’s welfare as opposed to reacting later. If a child is identified as requiring early help, staff must discuss this with the Designated Safeguarding Lead (DSL) or Designated Safeguarding Officer (DSO). Staff may be required to support in the assessment and planning of early help to support children.

In order to identify children who require early help, staff need to be alert to those children who are disabled; have specific additional needs; have special educational needs; are a young carer; are showing signs of antisocial or criminal behaviour; has been in difficult family circumstances (such as substance abuse, mental health problems or domestic violence); has moved home addresses lots of times or who is showing early signs of abuse and/or neglect. The School recognises that some

children can be made more vulnerable due to perceived differences on the grounds of race, religion, gender, sexual orientation, disability or other differences.

The School is also alert to the potential need for early help for a child who comes from a split family, looked after children, previously looked after children and care leavers. The DSL will inform the Tutor about the child's circumstances. The Tutor will monitor the child and put in place any necessary special arrangements and support.

All staff, including the DSL and DSO, should consider the context within which safeguarding incidents and/or behaviours occur. This is known as 'contextual safeguarding', which means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. If staff are concerned about the welfare of a child, they should always act in the best interests of the child. If staff are unsure about any aspect of safeguarding, they should speak immediately to the DSO or DSL without delay and should not assume that a colleague will raise the matter and share information that may keep a child safe.

Staff should be mindful that sharing information at an early stage is essential for effective safeguarding and promoting the welfare of children. Information should be shared to ensure children and young people are kept safe.

The School recognises its responsibility to put in place effective procedures both for detecting and preventing abuse and for ensuring that parents, staff and Governors are aware of the School's role in this respect, in line with locally-agreed inter-agency procedures.

5.6 Difference between a 'Concern' and an 'Immediate Risk of Harm'

If staff members have any concerns about a child (as opposed to a child being in immediate danger), this can be reported to the DSO in order to agree a course of action. Other options could include speaking to a child's Head of House (HoH), their Tutor or class teacher. If a child is in immediate danger or at risk of harm, a referral should be made to the DSO immediately. Anyone can make this referral. The DSO, in consultation with the DSL, will then decide on the course of action and whether to refer this to the Police or Social Welfare Department.

5.7 Child-on-Child Abuse

All staff should recognise that children are capable of abusing their peers. Child-on-child abuse is any form of physical, sexual, emotional or financial abuse, and coercive control exercised between children and within children's relationships (both intimate and non-intimate), friendships, and wider peer associations. Child-on-child abuse can take various forms, including (but not limited to) serious bullying (including cyberbullying); relationship abuse; domestic violence and abuse; child sexual exploitation; youth and serious youth violence; harmful sexual behaviour; and/or prejudice-based violence including, but not limited to, gender-based violence.

We take any incidents seriously. Investigations into a child-on-child abuse incident in the Senior School will follow the Behaviour Policy in terms of process and sanctions. In the Junior School, the information is passed directly to the Vice Principal (Head of Junior School) to investigate. In both cases, parents are always informed about the incident, including the victim's parents who are also invited in for a discussion. Perpetrator's parents must meet with staff. It is recorded on our internal system. We investigate by collecting statements from all those involved including victim,

perpetrator and witnesses. We also use screenshots of any online child-on-child abuse. Statements are all kept on file. When appropriate, Restorative Justice is offered to allow for reconciliation and to resolve conflict - this is held by a trained practitioner in a language of their choice. Individual counselling is always offered to the victim(s) and perpetrator.

To minimise the occurrence of child-on-child abuse, we try to ensure vigilance by staff at key times such as break times, lunches and changeover time. Lessons in Personal Social and Health Education (PSHE) and tutor time are used to raise awareness. The Bullying Awareness Week focuses on child-on-child abuse and isolation.

6. IMPLEMENTATION

6.1 Roles of responsibility

Safeguarding children is everyone's responsibility.

6.1.1 The Designated Safeguarding Governor must ensure the School implements its policies on:

- Appointing a Designated Safeguarding Lead (DSL) and Designated Safeguarding Officers (DSO).
- A training strategy that ensures all staff, including the Principal, receive 'Basic Safeguarding Training', with refresher training yearly. The DSL and DSO should receive refresher 'Advanced Safeguarding Training' at least every two years.
- Safeguarding and child protection procedures that are consistent with UK and Hong Kong government best practices, reviewed annually and made available to parents on request.
- Dealing with allegations of abuse made against members of staff, including allegations made against the Principal.
- Safer recruitment procedures that include the requirement for appropriate checks in line with Hong Kong and UK guidance.
- Arrangements to ensure that all temporary staff and volunteers receive safeguarding induction.

6.1.2 The Principal's responsibilities are:

- To ensure that the safeguarding policy and procedures are implemented and followed by all staff.
- To allocate sufficient time and resources to enable the DSL/DSO to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings.
- To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing and Managing Allegations Against Staff procedure.
- To ensure that child safety and welfare is addressed through the curriculum.
- Manage any allegations made against staff. In the case where these are referred to the DSL, they must pass these on to the Principal without delay.

6.1.3 The Designated Safeguarding Lead (DSL) will:

- Be a member of the Senior Leadership Team.

- Liaise regularly and work in partnership with the DSO to ensure they are informed about the current needs of the School in order to inform safeguarding strategies.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding.
- Advise how safeguarding risk can be addressed in the planning of events, activities and development of school facilities.
- Monitor and evaluate the effectiveness of the School's Safeguarding Policy.
- Report to the Governing Body on safeguarding matters at every Governing Body meeting.
- Lead an annual evaluation of the safeguarding provision at the School.
- Ensure all governors have received Safeguarding Induction Training on appointment and are given a Safeguarding briefing every two years to keep them up to date on policy and practice.
- Ensure all members of the safeguarding team are known to all and include a member of the senior leadership team, a female, a Cantonese speaker and a Mandarin speaker. All members of the safeguarding team should be accessible and approachable to students and staff.
- Ensure the DSO and the Designated Governor receive Advanced (Level 3) Safeguarding Training every two years.
- Chair the Safeguarding Committee and manage the School's Safeguarding Action Plan.

6.1.4 The Designated Safeguarding Officer (DSO) will:

- Be available to discuss concerns about suspected child abuse with staff.
- Take lead responsibility for promptly referring all cases of suspected abuse of any student at the School to the Principal/DSL (whenever possible) and the Social Welfare Department.
- Take lead responsibility for promptly informing the Principal/DSL (whenever possible) and making referrals to the police where a crime may have been committed that involves a child.
- Liaise with the Principal and DSL in respect of police investigations or child abuse investigations that involve the School.
- Keep records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely on eTeach (as detailed in Article 7.6) and reported onward in accordance with this policy guidance but kept separately from the child's general file.
- Attend subsequent meetings required by the referral and manage the School's contributions to any plans put in place thereafter.
- Act as a focal point for liaison with authorised agencies.
- With the support of the DSL, arrange training for all teaching and non-teaching staff every year and keep records of training in accordance with the requirements set out in Article 6.3.
- With the support of the DSL, ensure all new staff receive induction on child protection procedures.
- With the support of the DSL, ensure all volunteer and temporary staff who assist with school duties receive safeguarding induction.
- Ensure that in the case of absence from school, the DSO communicates this with the DSL and the name and contact details of the responsible person is communicated to the whole school via email.

6.1.5 Deputy Designated Safeguarding Leads (DDSLs)

In case of the absence of the DSL/DSO, identified Deputies carry out the role outlined above in 6.1.3. The DSO/DSL will always work in partnership with at least one Deputy DSL to ensure there is continuity with a case should they (the DSO/DSL) become unavailable for any reason. As a result of this and their requirement to deputise in the DSO/DSL's absence, they should receive the same level of 'Advanced Safeguarding Training' every two years that the DSO/DSL does. The Deputy DSL is listed in Appendix 1 of this policy.

6.1.6 The eSafety Lead (ESL) will:

- Be proactive in mitigating risks by taking reasonable steps to minimise them.
- Raise awareness of and educate the community (parents, teachers, support staff, students, etc.) in good eSafety practices.
- Establish effective rules of acceptable use, procedures and consequences regarding technology use and review these regularly.
- Monitor and evaluate the effectiveness of the School's eSafety Policy.
- Develop and review appropriate reporting channels for eSafety concerns.
- Take the lead in responding quickly to any breaches in policy and keep a log of incidents.
- Support community members as they develop good eSafety habits, including providing materials and training resources.
- Conduct eSafety seminars for community members on relevant topics within the field.
- Keep up to date with latest risks to children using technology, research and trends on eSafety, and bring any matters to the attention of the Senior Leadership Team and other agencies as appropriate.
- Ensure the School is using effective technological strategies to keep users safe online (e.g. internet filtering).
- Conduct regular risk assessments regarding eSafety.
- Regularly review eSafety practices to identify strengths and weaknesses of the system.
- Develop and implement an eSafety curriculum throughout the School that educates at an age-appropriate level.
- Liaise with the local authority and other local and national bodies as appropriate.

The Network Manager / Technical Staff are responsible for ensuring:

- That the School's technical infrastructure is secure and not open to misuse or malicious attack.
- The School meets required online safety technical requirements within Hong Kong Law.
- Users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed as per the Data Policy.
- The filtering policy is applied and updated on a regular basis.
- They keep up-to-date with eSafety technical information in order to effectively carry out their online safety role and to inform and update others as relevant.
- The use of the School's network and internet is regularly monitored in order that any misuse or attempted misuse can be reported to the Principal and/or Designated Safeguarding Lead for investigation.

- Monitoring software and systems are implemented and updated as agreed in School policies.

6.1.7 Designated Safeguarding Focal Points

In addition to the DSL, DSOs and DDSLs, some staff have been identified as Designated Safeguarding Focal Points; they are to encourage children to report their own concerns more easily. These staff members are identified because of their language skills, availability, approachability and time spent with students on a one-to-one basis. At NLCS Hong Kong, we work as a team and, therefore, they have been selected to provide a balance of gender, ethnicity, language (English, Cantonese and Mandarin speaking), role, experience and to ensure we have staff who represent the Junior School, Senior School and Support Staff. These are voluntary positions. Designated Safeguarding Focal Points are expected to complete Level 2 child protection training every two years, alongside the whole school training that the DSL/DSO provides.

6.1.8 Managers are required:

- To implement safeguarding policy in their area.
- To ensure that Safeguarding is a standing item on all agenda.
- To ensure that information posters are clearly displayed throughout their area.
- Managers are all those staff who have responsibility for an area of the School's operation and so include:
 - All members of Senior Team and Senior and Junior School Leadership Teams
 - Director of IT
 - Heads of Department (HoDs)
 - Heads of House (HoH)
 - Managers of Co-Curricular provision and Sport
 - Managers of Administration, Marketing and Human Resources, etc.
 - Managers of Cleaning, Catering and Maintenance teams, etc.

6.1.9 All Staff (Teaching and Non-teaching and Volunteers) are required:

- To know the identity of the Designated Safeguarding Lead, Designated Safeguarding Officers, Deputies and Focal Points.
- To read and understand the Safeguarding Policy and procedures (staff must complete the 'Policy Sign Off' sheet to confirm they have read the policy and appendices and give it to HR to be stored on their file every year of employment).
- To read and understand the Staff Code of Conduct (including Safeguarding) (this must also be signed off and given to HR to be stored on their file every year).
- To report any child protection issues to the Designated Safeguarding Officer, either in person or via My Concern.
- To report in person any safeguarding concerns they may have regarding a member of staff.
- To always discuss or record, in writing, any misunderstanding, accidents or threats with either the DSO, DSL or Deputies.
- To read the UK's Department for Education Keeping Children Safe in Education 2025, Part 1 and Annex A.
- To complete online training as determined by the DSL.
- Attend face-to-face training as required.

6.2 Disclosure, Reporting, Investigation & Referral

The procedure for staff and the DSL is outlined in flowchart form in Appendix 4.

6.2.1 Initial disclosure

All members of staff may receive a disclosure. The advice in this situation is “Listen, Believe, Support”. And then Report. Notes of the meeting, quoting verbatim if possible, should be passed on to the DSL via an eTeach report or in person.

6.2.2 Reporting

If a member of staff or volunteer suspects that a student is the victim of abuse, whether physical, emotional, sexual or as a result of neglect, she/he must inform the DSO. The report should be made immediately to reduce any risk to the child. Staff are asked to remember that “it could happen here” and act in accordance with the mantra “What if I am right?”, not “What if I am wrong?”. Reports are made via the eTeach system or in person.

If the suspicion relates to a member of staff, volunteer, or Governor, the matter must be dealt with in accordance with the procedures set out in the Whistleblowing and Managing Allegations Against Staff Policy. The Principal is the first point of contact and must be reported to in person.

Once in receipt of a report, the Principal will decide whether to make a referral to the police or Social Welfare Department. They will also decide on the appropriate course of action in order to support the child further.

If the suspicion relates to the Principal, the Chair of Governors is the first point of contact.

6.2.3 Recording

All referrals are recorded at the point of disclosure by all staff involved using the eTeach 360 Safe portal (Appendix 4). If you are unable to access the eTeach portal, you should hand write the disclosure verbatim and then call the DSO. The DSO will follow up on the eTeach report according to the safeguarding protocols. Please note that information will only be shared on a ‘need to know’ basis.

6.2.4 Investigation

After the disclosure has been made, the DSO may conduct a short investigation in order to gain a full understanding of the situation should this be needed in order to make an informed decision regarding a possible referral. This investigation may involve speaking to the child and other parties. All investigations involve the sole use of open-ended questions and repetition of what has been said. At the end of the investigation, a decision is made in discussion with either the DSL or another DDSL as to whether to refer or offer alternative support.

6.2.5 Referral

In deciding whether to make a referral, the DSO may consult with a Safeguarding Incident Committee that may include the DSL, Principal, Head of House, Pastoral Leader and/or School Emotional Counsellor. The Principal, or someone formally deputising for the Principal, is always informed of the intention to make a referral unless the time needed to do this puts the safety of a child at risk.

If the decision to refer is made by the DSL/DSO, a trained translator will be available to assist. This will be followed up with an email containing details of the referral. The parents are contacted and informed that a referral has been made if this has not been done already during the investigatory period.

6.2.6 Cultural Context

We operate in an international setting and take care to understand Hong Kong and other cultural aspects of our students' lives and how this impacts on their and our understanding and interpretation of abuse and neglect. In particular, we take care to understand the implications this has on our interactions with parents regarding referrals. That said, we also take care not to let it impact our decision-making process as to whether or not we refer abuse. We recognise that a child's right to feel safe and receive adequate care and shelter is both absolute in its importance and essential to all cultures regardless of local opinion. Whilst cultural perspective may have influence on whether a referral is accepted by the Social Welfare Department, it will not have influence on whether or not we refer it.

6.2.7 Support

Whenever a disclosure is made, counselling is offered to both the student and (depending on the circumstances) staff. We prioritise support for the student to ensure we safeguard them from further harm and provide opportunities for them to disclose further should they need to. We can also provide ongoing support to the family should it be needed.

In some circumstances, it may be deemed that a referral to the Social Welfare Department or police is unnecessary to promote the best interests of the child. It may also be the case that, after the referral, the support offered to the family from the police or Social Welfare Department does not meet the needs of the family in our eyes. In either circumstance, the DSO may, in agreement with the DSL and Principal, initiate a Safeguarding Support Plan. This is done with the family to help them achieve positive change.

6.3 Raising Awareness, Policy Updating and Training

6.3.1 The DSL shall:

- Ensure the Safeguarding Policy is reviewed annually and that the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this.
- Ensure this Policy is available publicly in English and Mandarin.
- Ensure that all staff sign to indicate they have read and understood this policy.
- With the support of the DSO, provide Safeguarding Induction Training for all new staff and ensure that all staff receive training every year. This training should meet the requirements of 'Basic Safeguarding Training'.
- With the support of the DSO, provide annual safeguarding briefing training for all returning staff (including support staff, Peer Mentors, contracted staff, volunteers, that serves to refresh staff of their safeguarding responsibilities. This should also be provided in Cantonese or Mandarin for those who do not speak English.
- Ensure that the Recruitment Manager attends Safer Recruitment Training every two years.
- Keep a record of staff attendance at Safeguarding training.
- Complete 'Advanced Safeguarding Training' every two years.

- Keep up to date with local child protection policies, regulations and contact details through continued discourse with the local Social Welfare Department.
- Ensure that the photos of the DSL, DSO, Deputies and Focal Points are posted on walls visible to all staff and students in appropriate locations in the School.
- Where necessary, deputise for the DSO in the case of the DSO's absence from school.
- Advise and support the DSO when required.

6.3.2 The DSO shall:

- Ensure that parents are aware that referrals about suspected abuse or neglect may be made to the Social Welfare Department and the School's role in this.
- Maintain links with the Social Welfare Department to ensure staff are aware of training opportunities and the local policies on safeguarding.
- Ensure that when students leave the School, their child protection file is copied for any new school or college as soon as possible but transferred separately from the main student file unless this conflicts with data protection law.
- With the support of the DSL, provide Safeguarding Induction Training for all new staff and ensure staff repeat this training every year. This training should meet the requirements of 'Basic Safeguarding Training'.
- With the support of the DSL, provide annual safeguarding briefing training for all returning staff (including support staff, Peer Mentors, contracted staff, volunteers, that serves to refresh staff of their safeguarding responsibilities. This should also be provided in Cantonese/Mandarin for those who do not speak English.
- Complete 'Advanced Safeguarding Training' every two years.
- Keep up to date with local child protection policies, regulations and contact details through continued discourse with the Social Welfare Department.
- Liaise regularly with the DSL to inform the School's policy and procedures and support the Safeguarding Committee.

6.3.3 Training Framework

- For the detailed training matrix see Appendix 6.
- All staff receive a two hour training session at the start of the academic year delivered by the DSL and safeguarding team. Understanding is tested with short reflection tests and an attendance register taken and added to staff records.
- All staff complete two EduCare online modules every year e.g. Online Safety, Child-on-Child Abuse. Courses are certificated and added to staff records.
- Safeguarding updates are delivered at staff meetings.
- eTeach 360 Safe training is available to all staff.
- The Principal attends ICPA Advanced training every two years.
- The DSL, DSOs and DDSLs attend ICPA Advanced training in rotation.
- The DDSLs and focal points complete Level 3 Safeguarding Training every three years.
- Key pastoral carers are encouraged to complete Level 3 Advanced Safeguarding training.
- The 'sensitive' areas of the School e.g. sport, music and early years, induct their staff with additional briefing materials. These briefings are delivered by the Head of Department.

6.4 Allegations

For details about responding to allegations involving staff, students or parents, please see the Whistleblowing and Managing Allegations Against Staff Policy for more details.

6.5 Missing Child Procedures

Please see the School's PC004 Missing Student Policy for further details. If the School becomes aware of a child having run away or gone missing from home or a Boarding Home, this is considered a safeguarding matter and child protection procedures are followed.

7. PREVENTION

7.1 Safer Recruitment

The School must operate recruitment in line with the HR006 Recruitment, Selection & Disclosure Policy to ensure safeguarding is part of recruitment procedure. A risk assessment process is used in the recruitment of staff.

7.2 Partners

NLCS Hong Kong works with many partners such as bus companies, co-curricular providers, caterers, security and cleaners. This policy requires that the School expects the same commitment to Safeguarding from these partners and is willing to support partners in achieving these standards of practice. They must all read and adhere to our Safeguarding Policy and Code of Conduct (abridged versions of policies provided in local language) when in contact with our students. A sign off form must be completed to declare that key documentation has been read and understood. Online training provided by childsafeguarding.com must be completed and certificated in advance of commencing work at the School. This training can be conducted in their chosen language. Partners are also expected to attend an in-person contextualised safeguarding briefing delivered by the safeguarding team's Cantonese/Mandarin Focal Point.

7.3 Safeguarding Committee

The Safeguarding Committee is composed of the DSL, DSO, DDSL and Focal Point. On occasions, the School Nurse is invited to attend. The committee is chaired by the DSL and meets every half term. The purpose of the committee is to discuss and formulate strategy, including training. The Principal receives the minutes.

7.4 Student Council

One purpose of this council is to provide another avenue for the communication of safeguarding concerns from the student body to the DSL/DSO. The Student Council consists of elected student leaders and includes the Student Welfare Ambassador, some House Captains and some Prefects. The leaders of the Student Council meet the DSL/DSO every half-term to identify areas for investigation or to review and report back any concerns. It is not intended that this forum is to discuss individual students but should focus more on the times, situations and places where students feel unsafe.

7.5 Risk Assessments

Risk assessments for all events and activities involving children and for programmes and projects that affect children are completed with safeguarding implications in mind. Safeguarding should appear as a standing item on appropriate agenda and development plans. The Bursar leads in ensuring these are completed and up to date.

7.6 On Site Security

The School takes all practical steps to ensure that school premises are as secure as circumstances permit. The School's Visitor's Policy outlines how, where and when visitors must sign in at NLCS Hong Kong. It also details all measures made to safeguard the site of NLCS Hong Kong including academic, artistic performance and sporting facilities.

7.7 Confidentiality, Information Sharing and Storage

The Children Act (1989) and Keeping Children Safe in Education (September 2025) state that the "welfare of the child is paramount". This means that considerations of confidentiality which might apply to other situations should not be allowed to override the right of children to be protected from harm. However, every effort should be made to ensure that confidentiality is maintained for all involved when a concern has been expressed and is being investigated. Hong Kong's 'Personal Data (Privacy) Ordinance, Cap 486' provides specific exemption for collection of data and transfer of information under Part VIII of the Ordinance.

All staff understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved, but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSO/DSL/Deputies or the Principal (depending on who is the subject of the concern). That person then decides who else needs to have the information and they will disseminate it on a 'need-to-know' basis (such as to the Designated Safeguarding Governor / Strategic Safeguarding Lead).

Child protection information is stored and handled in line with the UK Data Protection Act 2018 and the Hong Kong Personal Data (Privacy) Ordinance principles.

Information is:

- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Kept no longer than necessary
- Processed in accordance with the data subject's rights
- Secure

Concerns are logged and stored securely on the My Concern system. Record of concern forms and other written information are stored in a locked fireproof facility and then scanned and uploaded to My Concern. Any additional electronic information is password protected and not on a shared system. It is only made available to the relevant individuals. All digital records are stored on My Concern and all physical records are kept in one single office to which only the DSL, DSO and Principal have access.

Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers or any other portable device which, by the nature of their portability, could be lost or stolen. Hard copies of child protection information are stored separately from the child's school file and, should a student leave the School, the DSO will be notified beforehand.

Child protection records are exempt from the disclosure provisions, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they should refer the request to the Principal. This does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

The School's policy on confidentiality and information-sharing is available to parents and children on request.

7.8 Safe Use of Images of Children

The School adheres to the Use of Pupil Images Policy, the Social Media Policy and the Digital Safety Policy in order to keep students safe from risk.

7.9 Safe Use of ICT

The eSafety lead is the Director of IT. His/her role is part technical and part educational. He/she ensures suitable filters are in place on the School network and is centrally involved in the education of students and staff in online safety.

Most of our children will use mobile phones, tablets, laptops and computers at some time. They are a source of fun, entertainment, communication and education. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

The School's Technology Policies explain how we try to keep children safe in school. These include the ICT Policy, Digital Safety Policy and Social Media Policy. Cyber-bullying by children, via texts and emails, is treated as seriously as any other type of bullying and is managed through our anti-bullying procedures. Chat rooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour, and children are not allowed to access these sites whilst in school.

8. AFTERCARE

8.1 Aftercare for Children and Families

All children, families and staff are entitled to aftercare following a safeguarding investigation. This is to ensure that all parties understand the ongoing support that is in place (where necessary) and that children and families receive support, whether this be internal, school support or external support. The DSO works with the relevant staff to determine the ongoing plan for support of children and families undergoing safeguarding procedures. The DSO will be clear on who is managing the aftercare of the child and their family and inform the responsible staff member in writing of this. As all case responses are decided on an individual case-by-case basis, a mandatory review point will be decided during the staff debrief (see 9.2 below). If a parent refuses to participate in the ongoing support plan drawn up by school then, depending on the circumstances of this, a referral to external services (CPA and police) may be necessary. This is reviewed and decided on by the DSO in consultation with the DSL.

8.2 Aftercare for Staff (Staff Debrief)

Following a safeguarding investigation, the staff involved are de-briefed by the DSL and/or DSO within 24 hours of the investigation ending, or as soon as practically possible. This meeting allows all staff members involved with the child to ask questions and to support

the DSL/DSO in planning for the child's aftercare. This is also the forum to ensure that all staff feel supported throughout the process and, where necessary, staff are given the option of counselling for themselves. During the debrief, students' and families' confidentiality must be preserved and staff must only be included on a 'need to know' basis. During the staff debrief, a mandatory review point will be decided by the DSL/DSO and the case is reviewed at that point.

9. MONITORING AND REVIEWING

- 9.1 Should deficiencies or weaknesses be recognised with regard to child protection arrangements at any point, they should be remedied without delay.
- 9.2 The Principal and Senior Team (including the Designated Safeguarding Lead) monitor and evaluate, with Governors, the effectiveness of the Safeguarding Policy on an annual basis.
- 9.3 The Safeguarding Policy is subject to review at least annually (or more frequently if changes to legislation, regulation or statutory guidance so require).
- 9.4 The Safeguarding Policy is also subject to critical review by the Designated Governor with Safeguarding Responsibility who has received safeguarding training, on an annual basis, the outcome of which is reported to the full Governing Body.
- 9.5 The full Governing Body annually reviews this policy and the implementation of its procedures, including good co-operation with local agencies, and approves amendments to the policy, which will, in turn, be signed off by the Chair of Governors. This annual review takes account of evidence such as staff training in safeguarding matters, referral data, analysis of any issues and themes that have emerged in the School and how these have been handled, initiatives to educate students about safeguarding, and details of any contribution the School has made to local discussions on safeguarding matters.

APPENDIX 1:

Contact Details for Safeguarding and Child Protection at NLCS Hong Kong

Role	Name	Position	Contact Details
Designated Safeguarding Governor (DSG)		Chair of Governors	
Principal	Dan Coll	Principal	(852) 91815359
Designated Safeguarding Lead (DSL)		Vice Principal Head of Junior School	
Designated Safeguarding Officer (DSO)		Junior School Pastoral Coordinator	
Deputy Designated Safeguarding Lead (DDSL)		TBC	
Designated Safeguarding Focal Point (Chinese)		Chinese Parent Liaison	
eSafety Lead		IT Manager	

APPENDIX 2:

Key External Agencies, Services and Professionals' Contact Details

Social Welfare Department (SWD) Hotline	(852) 2343 2255
Family and Child Protective Services Units (FCPSU) in Kowloon	(852) 3583 3254
Child Abuse Investigation Unit (CAIU) in Kowloon	
Designated Police Officer to International Schools in Hong Kong	
Hong Kong Society for the Protection of Children	(852) 2396 0264
Children and Family Services	(852) 2760 8111
Emergency Help Police, Fire Services, Ambulance	999
Police Hotline	(852) 2527 7177
Police Duty Controllers in Kowloon	
Cyber Crime e-Report Centre	(852) 2860 2000
Missing Persons	(852) 3661 8039
Suicide Prevention Services	(852) 2341 7227
Suicide Prevention Services	(852) 2382 0000
Samaritan Emotional Support Hotline (Chinese)	(852) 2389 2222
Samaritan Emotional Support Hotline (English)	(852) 2389 2223
Caritas Family Crisis Line	(852) 18288
Hospital Authority Psychiatric Hotline	(852) 2466 7350
Mental Health Promotion (Hong Kong) 'Shall We Talk' Initiative	www.gov.hk > Mental Health

APPENDIX 3:

Types and Signs of Abuse

1 Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or failing to protect a child from that harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

2 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including both penetrative or non-penetrative acts such as kissing, touching or fondling the child's genitals or breasts, vaginal or anal intercourse or oral sex.

They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

3 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

4 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision including the use of inadequate caretakers; or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

5 Significant Areas of Concern

Additionally, there are other notable areas that cause harm to children in specific ways.

5.1 Domestic Violence (DV)

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.

The abuse can encompass but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

This is specifically related to emotional abuse as research has shown that witnessing DV can cause extensive emotional trauma to children. Research has shown that this damage can start whilst the child is still in the womb.

5.2 Child Sexual Exploitation

Child sexual exploitation (CSE) is when children and young people receive something (such as food, accommodation, drugs, alcohol, cigarettes, affection, gifts, or money) as a result of performing, and/or others performing on them, sexual activities. Child sexual exploitation can occur through the use of the Internet or on mobile phones. In all cases, those exploiting the child or young person have power over them because of their age, gender, intellect, physical strength and/or resources. Whilst this is part of sexual abuse, the key aspect to be aware of is that in many cases the victim may be a willing participant.

5.3 Female Genital Mutilation

Female genital mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. The practice is mostly carried out by traditional circumcisers who often play other central roles in communities, such as attending births. However, more than 18% of all FGM is performed by healthcare providers, and the trend towards medicalisation is increasing.

FGM is recognized internationally as a violation of the human rights of girls and women. It reflects deep-rooted inequality between the sexes, and constitutes an extreme form of discrimination against women. It is nearly always carried out on minors and is a violation of the rights of children. The practice also violates a person's rights to health, security and physical integrity, the right to be free from torture and cruel, inhumane or degrading treatment, and the right to life when the procedure results in death.

Whilst it is most common in African culture, it can present in others and is classed as a form of both physical and sexual abuse. Warning signs would be severe pain, shock, haemorrhage (bleeding), tetanus or sepsis (bacterial infection), urine retention, open sores in the genital region and injury to nearby genital tissue.

5.4 Radicalisation

Radicalisation is the process by which children or young people adopt increasingly extreme political, social or religious ideals and aspirations that undermine the status quo, and undermine

expressions of the nation and contemporary ideas. Radicalisation can be violent or non-violent, although most academic literature focuses on radicalisation into violent extremism. In children and young people, this can be difficult to spot. Signs that a child is being radicalised include isolating themselves from family and friends; talking as if from a scripted speech; unwillingness or inability to discuss their views; a sudden disrespectful attitude towards others; increased levels of anger; and increased secretiveness, especially regarding their internet use. Those children and young people who are at risk are those with low self-esteem, or victims of bullying and/or discrimination. Extremists might target them and tell them they can be part of something special, later brainwashing them into cutting themselves off from family and friends.

5.5 Child-on-Child Abuse

It is recognised in Keeping Children Safe in Education 2019, that abusive behaviour may happen to students in schools. Keeping Children Safe in Education 2020 recognised that this may not necessarily be between peers so updated the term to Child-on-Child abuse. Abuse is abuse and should never be tolerated or passed off as ‘banter’ or ‘part of growing up’. Abuse can sometimes be gender specific; it is important to consider the types of abuse that may occur and the actions that the School will take to prevent it from happening. There are many forms of abuse that can happen between peers - bullying, causing physical harm; sexually harmful behaviour; cyberbullying; sexting; initiation or hazing; prejudiced behaviour; and/or racism. Please refer to the Anti-Bullying Policy, the Anti-Racism Policy and Behaviour Policy which outline how the School deals with these types of behaviours. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally, before considering the action or punishment to be taken.

Recognised Signs of Abuse

1 Physical

- Unexplained bruising, marks or injuries on any part of the body
- Multiple bruises - in clusters, often on the upper arm and/or the outside of the thigh
- Cigarette burns
- Human bite marks
- Broken bones
- Scalds, with upward splash marks
- Multiple burns with a clearly demarcated edge
- Pain or itching in the genital area
- Bruising or bleeding near the genital area
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy
- Constant hunger; sometimes stealing food from other children
- Constantly dirty or ‘smelly’
- Loss of weight or being constantly underweight
- Inappropriate clothing for the conditions

2 Behavioural

- Fear of parents being approached for an explanation

- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example in hot weather
- Depression
- Withdrawn behaviour
- Running away from home
- Neurotic behaviour, for example sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Developmental delay in terms of emotional progress
- Sudden or unexplained changes in behaviour, such as becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Sexual knowledge beyond their age or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults
- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments
- Having few friends
- Mentioning being left alone or unsupervised

APPENDIX 4:

How to Use the ‘eTeach Safeguarding Portal

After a staff member receives a student disclosure or is suspicious that a student may be subject to one or more forms of abuse, the staff member must make a report through the **My Concern** portal. All staff members must set up their **My Concern** account utilising the [linked information](#).

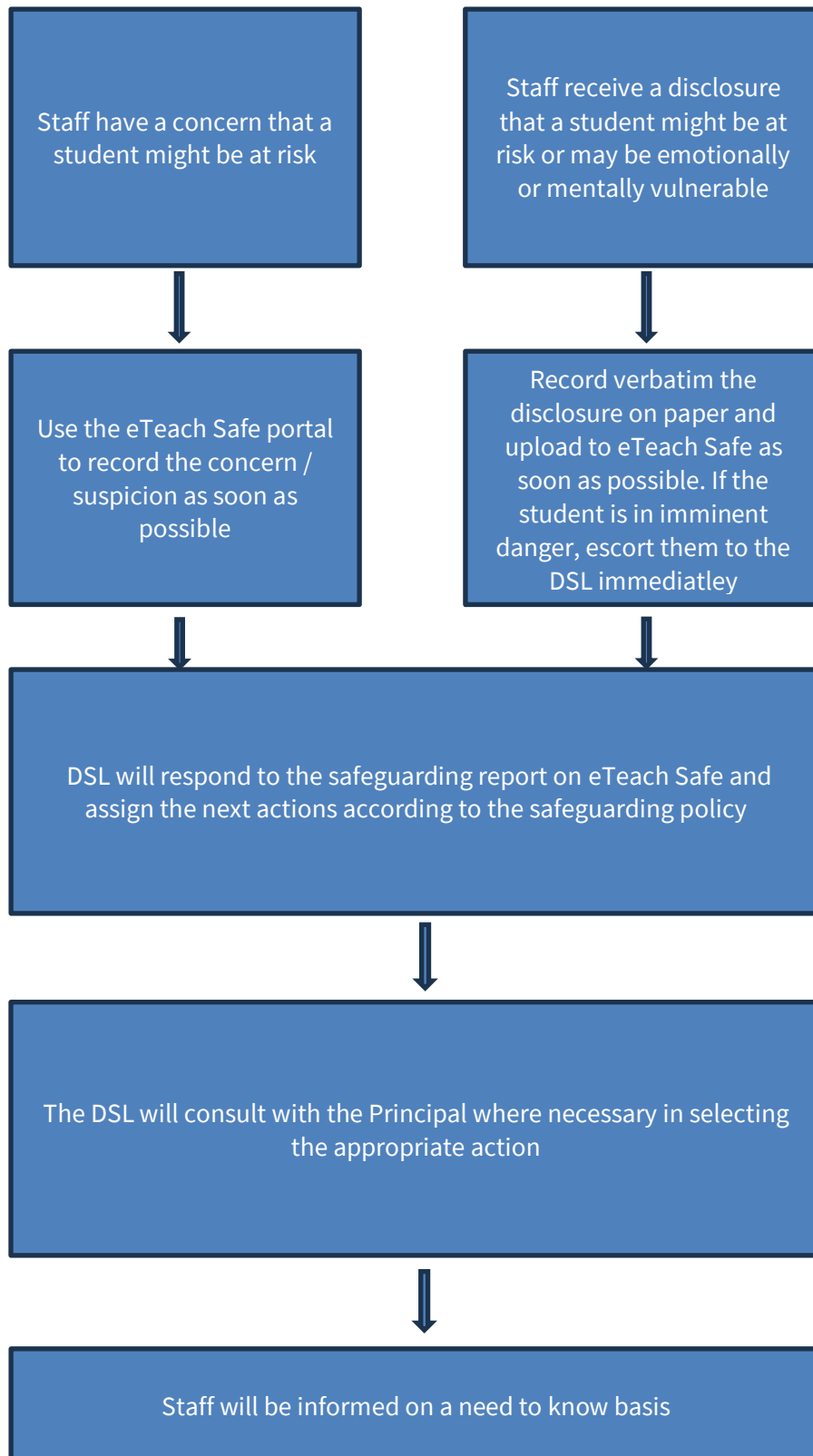
To make a report, navigate to [the portal or app](#) and login using your school credentials. Click on the red icon in the top right hand corner of the webpage that says “Report a Concern”.

- The first information box should be populated with all students who were involved in the incident.
- The second information box should be populated with a concise summary of the concern.
- The third box is based on the status of the student, specifically whether the individual is staff or a staff child, a junior school student, or a senior school student.
- The date and time can be selected from drop down boxes.
- Actions taken will consist of things you have done up to the point of reporting through the My Concern Portal.
- Please attach any evidence including photos of bruises, screenshots of online correspondence, body maps, or any other digital media at the bottom.
- Using the phone based application makes this process easy for evidence that can be captured with your camera.
- Be sure to remove all evidence from your devices within 24 hours of uploading the concern.
- The details section should contain a verbatim report obtained during the disclosure or an exhaustive explanation as to what your suspicion is.

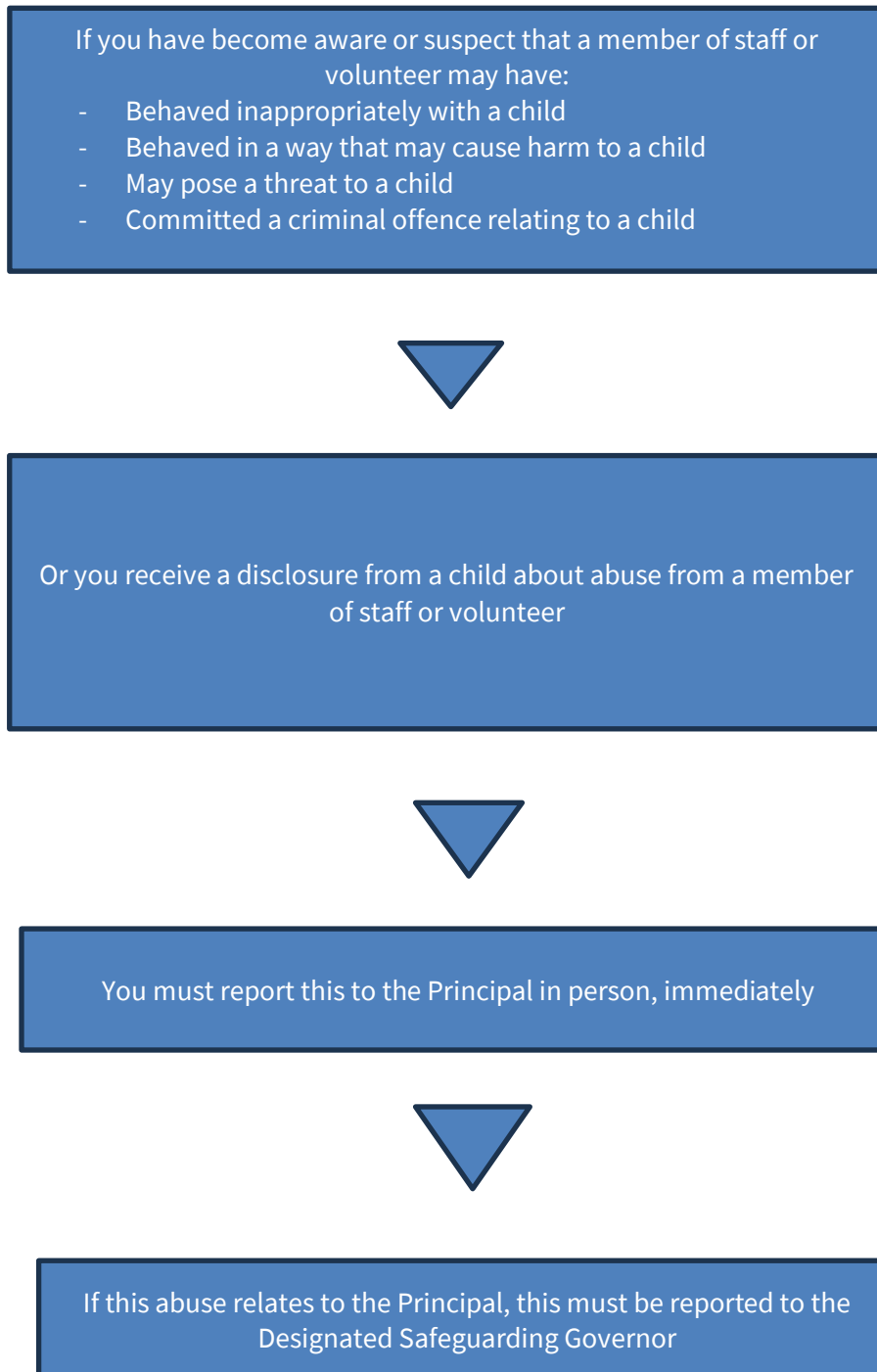
A member of staff may approach you to seek more information and clarity after the report is made. That individual may be a member of the Safeguarding Team or a Head of House. From this point, you may refer to the safeguarding flow chart in the policy for next steps. Any questions or concerns should be directed to the Designated Safeguarding Officer. If you have any concerns about the process or the way in which it is being handled, please contact the Designated Safeguarding Lead.

APPENDIX 5: SAFEGUARDING REPORTING PROCEDURE: STUDENT CONCERN

Referral Procedure for Safeguarding Children at NLCS Hong Kong



APPENDIX 6: SAFEGUARDING REPORTING PROCEDURE: STAFF CONCERN



APPENDIX 7:

Safeguarding Training Matrix

Role	Type of Training	Frequency
Safeguarding Governor	Safeguarding Briefing Level 3 Advanced Safeguarding EduCare Context Briefing	Yearly Every 3 years Every 2 years
Governors (UK)	Safeguarding Briefing Level 2 Safeguard Training EduCare Context Briefing	Yearly Every 3 years Every 2 years
Governors (Hong Kong)	Safeguarding Briefing Childsafeguarding.com Context Briefing	Yearly Every 2 years Every 2 years
Principal	Safeguarding Briefing ICPA Training Safer Recruitment Training	Yearly Every 2 years Every 3 years
Designated Safeguarding Lead	Safeguarding Briefing ICPA Training Level 3 Advanced Safeguarding EduCare Safer Recruitment Training Selected EduCare Modules	Yearly In rotation Every 3 years Every 3 years Every half-term
Designated Safeguarding Officer	Safeguarding Briefing ICPA Training Level 3 Advanced Safeguarding EduCare START Training ASIST Training Selected EduCare Modules	Yearly In rotation Every 3 years Every 3 years Every 3 years Every half-term
Deputy Designated Safeguarding Lead	Safeguarding Briefing ICPA Training Level 3 Advanced Safeguarding EduCare START Training ASIST Training Selected EduCare Modules	Yearly In rotation Every 3 years Every 3 years Every 3 years Every half-term
eSafety Officer	Safeguarding Briefing ICPA Training Level 3 Advanced Safeguarding EduCare Selected EduCare Modules	Yearly In rotation Every 3 years Every half-term

Safeguarding Focal Point and School Nurse	Safeguarding Briefing Level 3 Advanced Safeguarding EduCare Selected EduCare Modules	Yearly Every 3 years Every half-term
Pastoral Leads	Safeguarding Briefing ICPA Training Level 3 Advanced Safeguarding EduCare START Training ASIST Training Avoiding Restraint Training Safe Touch Training Selected EduCare Modules First Aid	Yearly In rotation Every 3 years Every 3 years Every 3 years Every 3 years Every 3 years Every half-term Every two years
Teaching Staff	Safeguarding Briefing Subject Specific Briefing Selected EduCare Modules	Yearly Yearly Every half-term
Support Staff	Childsafeguarding.com Department Specific Briefing	Every two years Yearly
Classroom Assistants	Safeguarding Briefing Subject/Age Specific Briefing Selected EduCare Modules First Aid	Yearly Yearly Every half-term Every two years
Peripatetic Staff	Childsafeguarding.com Department Specific Briefing	Every two years Yearly
Visiting Coaches	Childsafeguarding.com Department Specific Briefing	Every two years Yearly
Outside Providers	Childsafeguarding.com Department Specific Briefing	Every two years Yearly

APPENDIX 8:

NLCS Hong Kong Junior School Intimate Care Protocol

(Full Intimate Care Policy SFG002 available on the staff policy drive)

DEFINITION OF INTIMATE CARE

Care tasks of an intimate nature, associated with bodily functions, bodily products and personal hygiene, which demand direct or indirect contact with, or exposure of, the sexual parts of the body.

Intimate Care tasks include:

- Dressing and undressing (underwear)
- Helping someone use the toilet
- Changing wet/dirty clothes after a toilet accident
- Cleaning/wiping/washing intimate parts of the body
- Having an accident and hurting an intimate part of the body
- Showering after swimming/changing swimming/clothes/drying pupils after swimming

DEFINITION OF PERSONAL CARE

Although it may involve touching a person, it is less intimate and usually has the function of helping with personal presentation.

Personal Care tasks include:

- Administering oral medication
- Hair care
- Dressing and undressing (clothing)
- Prompting to go to the toilet
- Washing non-intimate parts of the body

INTIMATE CARE GUIDELINES

The issue of intimate care is a sensitive one and will require staff to be respectful of children's needs at all times. Children's dignity should always be preserved with a high level of privacy, choice and control when care is required.

It is the policy of NLCS HONG KONG that two members of staff are involved in a child's intimate care.

- Should a child need to be washed/showered/underwear changed then there must always be two adults present. This is to safeguard both the child and the staff member cleaning/washing the child.
- The intimate care of boys/girls must be carried out by a member of staff of the same sex. The only exception to this is the School Nurse.
- Should a child be hurt in an intimate place a judgement will be made about the need to look at this or whether to call the parent in to do so. In a non-serious/urgent case permission from the parent may be sought prior to two staff members being present. One of these would always be the School Nurse.

- Intimate care may take a considerable amount of time but should not be a frightening experience for the child.
- Children should be treated with dignity and respect and deserve privacy and support both physically and emotionally.
- Children should be confident and self-assured and should be encouraged to have a positive body image and to express choice.
- If the child appears distressed or uncomfortable when personal care tasks are being carried out, the care should stop immediately. Try to ascertain why the child is distressed and provide reassurance.
- When intimate care is being carried out, all children have the right to dignity and privacy i.e. they should be appropriately covered and/or the door closed

TOILET TRAINING

- Upon entry to Grade 1, it is expected that all children will be toilet trained. If children have specific toileting or intimate care requirements, the parents are expected to provide all the relevant information and be involved in the creation of a care plan (see above). All parents will sign a consent form giving permission for the School to provide intimate care if it is required.
- Care procedures will be carried out in the bathroom next to the Medical Centre.
- If a child has regular toileting issues then the teacher and parent will have met to discuss the most appropriate way forward for the child and if necessary a care plan will be put into place.
- If a child has regular toileting issues, parents are asked to send in spare clothes/uniform and underwear on a daily basis. Once toilet trained then a spare uniform should still come to school each day in case of the odd accident.

SOILED UNDERWEAR

- If underwear is slightly soiled from a toilet accident (urine) it will be rinsed and placed in a plastic bag inside the child's bag.
- Should underwear be completely soiled e.g. diarrhoea then the underwear will be bagged and thrown away.

SAFEGUARDING

- Mobile phones should not be taken into the toilet/changing areas. Staff must not use phones in the toilet/changing area.
- Parents are not permitted in the children's toilets.
- Parents and visitors should use the visitor/staff bathrooms.
- Should a child be hurt in an intimate place a judgement will be made about the need to look at this or whether to call the parent in to do so. In a non-serious/urgent case permission from the parent may be sought prior to two staff members being present. One of these would always be the School Nurse.

- If the child appears distressed or uncomfortable when personal care tasks are being carried out, the care should stop immediately. Try to ascertain why the child is distressed and provide reassurance.
- If a member of staff carrying out intimate care has concerns about physical changes in a child's appearance (e.g. marks, bruises, soreness), they will report this following the School's safeguarding procedures.
- If a child is hurt accidentally or there is an issue when carrying out the procedure, the staff member will report the incident immediately to the Designated Safeguarding Lead.
- If a child makes an allegation against a member of staff, the responsibility for intimate care of that child will be given to another member of staff as quickly as possible and the allegation will be investigated according to the School's safeguarding procedures.
- If a member of staff has concerns about a colleague's intimate care practice they must report this to the Principal.

COMMUNICATING WITH CHILDREN

To ensure effective communication:

- Ascertain how the child communicates e.g. consult with child, parent / carer and, if appropriate, communication needs must be recorded.
- Make eye contact at the child's level.
- Use simple language and repeat if necessary.
- Wait for a response.
- Continue to explain to the child what is happening even if there is no response.
- Treat the child as an individual with dignity and respect.

KEY POINTS

- Involve the child as much as possible in their intimate care.
- Consider what additional support the child needs following a toilet accident.
- Ensure two members of staff present if intimate care is required.
- Do not use your phone when in the changing/ toilet area.
- Inform parents of the need to have provided intimate care (other than toilet changes).
- If staff observe any unusual markings, discolourations or swelling they must report this to the Designated Safeguarding Lead.
- Report and record any unusual emotional or behavioural response by a child. This should be kept securely in the child's file.
- The Designated Safeguarding Lead must be informed if during intimate care a staff member accidentally hurts a child.
- Children are prompted to use the toilet to help avoid 'accidents'. In the first instance this should happen regularly. Children need to learn when they need to empty their bladder and what the feeling of a full bladder is. However, at the beginning of training regular toilet visits will be encouraged.

APPENDIX 9:

North London Collegiate School Hong Kong Safeguarding and Child Protection Code of Conduct Declaration

1. NLCS Hong Kong is committed to safeguarding and promoting the welfare of children and young people. This Code of Conduct applies to all members of staff, external contractors, volunteers and visitors and those who interact with students in both a direct and/or unsupervised capacity.
2. This Code of Conduct applies to both the public and private conduct of those acting on behalf of NLCS Hong Kong. We must, at all times, be aware of the responsibilities that accompany our work in both professional and private life.
3. We should be aware of our own and other persons' vulnerability, especially when working alone with students, and be particularly aware that we are responsible for maintaining physical, emotional, and sexual boundaries in such interactions. We must avoid any covert or overt sexual behaviours with those for whom we have responsibility. This includes speech or gestures as well as physical contact that exploits, abuses, or harasses.
4. We must use our discretion before touching a student and be aware of how physical touch may be perceived or received, and whether it would be appropriate.
5. The physical disciplining of a child is strictly prohibited.
6. Physical contact with students can be misconstrued. Contact should only occur for an appropriate purpose and when completely non-sexual and never in private.
7. Have another adult present in one-on-one meetings with a student. If this is not practical, hold the meeting in a public area; in a room where the interaction can be observed; or in a room with the door left open or which has glass walls. Always notify another staff member in advance.
8. It is your duty to report when there is evidence of, or reasonable cause to suspect, that students are being abused in any way. Suspected abuse or neglect must be reported to the appropriate member of the safeguarding team staff member, following the Safeguarding Policy.
9. No employees or visitors may be under the influence of alcohol and/or drugs when supervising students. NLCS Hong Kong is a no smoking and no vaping site. Staff must not smoke/vape on the School site or at any time when working with students.
10. Adults must never give students any drugs, (e-)cigarettes, alcohol, images or reading material that is inappropriate.
11. Employees and volunteers should not accept gifts from students without permission from their manager and in accordance with the School's Gifts and Anti-Graft Policy.
12. Communication with students is governed by the NLCS Hong Kong Staff ICT Acceptable Use Policy; all staff should be familiar with its contents.
13. If a staff member recognises that a student may be infatuated with them, their line manager must be informed immediately.

In signing this declaration, I acknowledge that I have read, or been made aware of, NLCS Hong Kong's Safeguarding and Child Protection Policy, and agree that in the course of my association with NLCS Hong Kong, I must never:

- hit, physically assault, or physically or psychologically abuse any child;
- act in ways towards any child that may have a negative effect on their development, including their social and relational development;
- act in ways that set a negative example for any children present;

- engage in sexual activity or have sexual relations with any current student of NLCS Hong Kong (of any age) or any former NLCS student under 21 years of age, irrespective of the definition of the age of majority or the way in which consent is legally recognised in different countries – believing that a child is older than s/he, in fact is, cannot be considered an acceptable defence;
- have any relations with a child that could be considered exploitation, maltreatment or abuse;
- act in ways that may be abusive or put a child at risk of exploitation, maltreatment or abuse;
- use language (online /face-to- face), make suggestions or offer advice that is inappropriate, offensive or abusive;
- behave in a manner that is inappropriate or sexually provocative (online, face-to-face, or any other medium);
- establish or engage in “continuous” contacts with NLCS Hong Kong students using online personal communication (e-mail, chats, social networks etc.) – only school email, professional online tools and environments (e.g. Google classroom) the organisation knows about may be used;
- whilst on any School-related activity, sleep in the same confined space as a child, such as the same room, tent or bed;
- do things for children of a personal nature that they can do themselves;
- give money, goods or other benefits to a child without your senior manager being aware of this;
- offer transport in my car to a student without express parental/management permission or in the case of emergency;
- condone or participate in behaviour by children that is illegal, abusive or endangers their safety;
- act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse;
- discriminate against, show differential treatment towards or favour particular children to the exclusion of others.

This list is not exhaustive or exclusive. The basic principle is that you must avoid behaviours that may be inappropriate or potentially abusive towards children.

It is also important that all staff and associates of NLCS Hong Kong, in any contact with children:

- are quick to identify situations that may place a child at risk and know how to deal with such situations;
- must report any concerns, suspicions or certainties about possible abuse or maltreatment of a child in accordance with the general procedures and this Code of Conduct;
- organise work and the workplace in such a way as to minimise any risks;
- always be as visible as possible to other adults when working with children;
- ensure that members of staff develop a sense of responsibility with regard to the way they operate so that any actions or forms of behaviour that are inappropriate or may lead to abuse of children do not go unnoticed or are tolerated;
- maintain the highest personal and professional discipline and integrity;
- respect children’s rights and treat children in a fair and honest way with dignity and respect.

DECLARATION

I promise to strictly follow the rules and guidelines in this 'North London Collegiate School Hong Kong Safeguarding and Child Protection Code of Conduct' as a condition of my providing services to the students and staff of NLCS Hong Kong.

Additionally:

- I will comply with the mandatory reporting regulations of NLCS Hong Kong to report suspected child abuse.
- I will cooperate fully in any investigation of abuse of students.
- I understand the School's Pastoral Vision statement and agree to support it in all of my dealings related to the School:

NLCS Hong Kong is a caring, courteous and considerate community in which everyone feels safe and valued, and able to thrive.

- I have read and understand the following documents/policies: Safeguarding and Child Protection Policy, the Staff Code of Conduct, Staff Digital Safety Agreement, the Anti-Bullying Policy, the Fire Evacuation and Fire Drill Policy, the Digital Safety Policy, the Social Media Policy, the Whistleblowing and Managing Allegations Against Staff Policy and the Anti-Bribery and Corruption Policy.
- I declare I have not been subject to an allegation, investigation, warning, conviction or any other action in relation to working with children, sexual related crimes, unethical conduct, abusive conduct or any other misconduct, and should this change at anytime during my employment I will immediately inform the School.
- I confirm I have been issued, read and understood Part One and annex A of KCSIE (Keeping children safe in education) guidance issued by the UK department of Education.
- I have attended or seen a presentation from the Designated Safeguarding Lead on child protection and safeguarding in the School on date: _____

My signature confirms that I have read this 'NLCS Hong Kong Child Protection & Safeguarding - Code of Conduct' and that, as a person working with students, I agree to follow these standards. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary action up to and including removal from NLCS Hong Kong.

Name: _____

Job Title: _____

Signature: _____

Date: _____

Once signed, this form should be returned to HR and a copy will be kept in employee personnel files.

References

Gov.UK Department of Education, 2025, Keeping children safe in education, Statutory guidance for schools and colleges. [Accessed 08/2025]

Gov.UK Department for Education, 2025, Working Together to Safeguard Children. [Accessed 08/2025]

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NSPCC, 2025. Child Abuse and Neglect. [Accessed 08/2025]

NSPCC, 2024, Key Safeguarding Legislation and Guidance for Schools. [Accessed 08/2025]

UNICEF, The Convention on the Rights of the Child. Guiding Principles: general requirements for all rights. [accessed 08/2025]

Gov.UK Online Safety Act 2023. [Accessed 08/2025]

Hong Kong Education Bureau: Resources of Student Guidance and Discipline Services

Hong Kong Education Bureau: Home-School Partnership in Safeguarding Children

Hong Kong Social Welfare Department: Protecting Children from Maltreatment Procedural Guide for Multi-disciplinary Co-operation

Hong Kong Social Welfare Department: Family and Child Protective Services