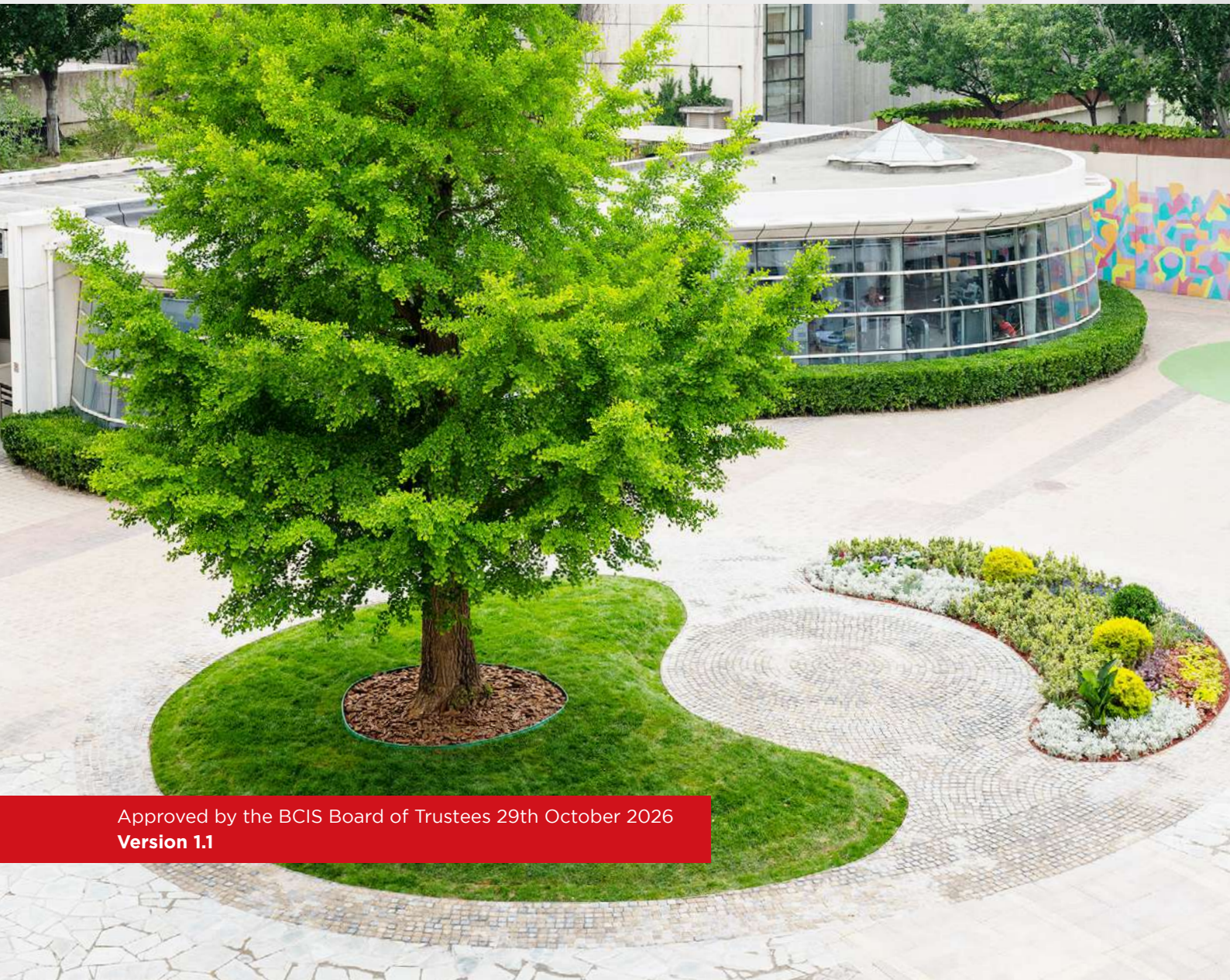
BCIS
BEIJING CITY INTERNATIONAL SCHOOL
北 京 乐 成 学 校

BCIS Safeguarding Policy



Approved by the BCIS Board of Trustees 29th October 2026
Version 1.1


Progressive

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BCIS Safeguarding Policy

The Beijing City International School (BCIS) Safeguarding policy exists as a framework of guidance and expectations for the BCIS community to promote the welfare of children and to protect them from harm and abuse. This policy applies to all members of the BCIS community, including staff, students, families, volunteers, board members, contractors, and visitors. This policy is aligned with the Law of the People's Republic of China on the Protection of Minors (2020) and the United Nations Convention of the Rights of the Child (1989). It is informed by practices recommended by the International Taskforce on Child Protection.

Purpose

- To protect all children from possible harm, abuse, exploitation, and neglect
- To create a safe and secure learning environment
- To create a safe and accessible structure for reporting allegations of harm or abuse
- To create clear, standardized procedures for responding to safeguarding concerns
- To outline the roles and responsibilities of key members of staff designated to the protection of children at BCIS
- To appropriately screen all new staff during recruitment
- To ensure that all members of the BCIS community have appropriate training in the protection of children
- To ensure all members of the BCIS community take responsibility for the safety of all students
- To ensure that safeguarding topics are integrated into the curriculum

Legal Framework

The BCIS Safeguarding policy aligns with local and international standards. This includes **Law of the People's Republic of China on the Protection of Minors (2020) and the UN Convention on the Rights of the Child (1989)**

Relevant Related Documents and Policies

All of the following documents can be found of the BCIS Hub.

BCIS Code of Conduct
This document must be read and signed by all adult members of the BCIS community.

BCIS Academic Personnel Manual
This contains procedures to be followed to ensure safe recruiting practices, as well as suspension and disciplinary procedures which may occur in the event a member of staff does not follow the code of conduct.

BCIS Digital Citizenship, Responsible use of Technology Policy
This document contains expectations of what staff and students must do to use technology responsibly.

Learning Technologies at BCIS, Responsible Use Policy
Aligned with the Digital Citizenship, Responsible Use of Technology Policy, this is an agreement signed by BCIS staff members to commit to responsible technology use.

BCIS Personal Social Physical Health Education and Child Safety Curriculum
This outlines content taught through dedicated lessons and integrated into the wider curriculum.

Definitions of Terms

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. This includes sexual abuse, neglect, negligent treatment, and exploitation which results in harm to the child's health, survival, development, or dignity. These can occur in person or online.

Child

Any individual under the age of 18, but this term also applies to current BCIS students.

Child Protection

Protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with their right to safe and effective care; taking action to enable all children to have the best outcomes.

Designated Safeguarding Lead (DSL)

The member of staff with designated responsibility for safeguarding and child protection within a division or area of the organization.

Deputy Designated Safeguarding Lead (DDSL)

A member of staff designated to support the DSL and undertake safeguarding responsibilities in accordance with this policy.

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 intimate body parts.

Positive Touch

A form of physical touch which staff members use to physically interact with the children they work with in a way which is respectful and appropriate for an educational context.

Safeguarding

Measures which protect the health, wellbeing, and human rights of individuals, which allow them to live free from abuse, harm, and neglect. These are the proactive procedures and protocols used to keep children safe from harm and abuse, as well as the protocols in place for Child Protection.

Safeguarding Incident Form

A form used to report any safeguarding related concerns.

Safeguarding Report

A confidential record used to document High-Level Safeguarding Responses.

Types of Abuse

Physical Abuse

Physical abuse is intentional physical injury which can include, but is not limited to, striking, kicking, burning, or biting the child, or any action that results in a physical injury or pain.

Possible indicators of Physical Abuse may include, but are not limited to:

- Injuries that appear to be intentional or where a child has unexplained bruising
- Welts, burns or lacerations
- Anxiety about being in certain places
- Refusal to discuss or improbable excuse given to explain injuries

Sexual Abuse

Any act that exposes a child to or involves a child in sexual processes beyond their understanding or contrary to accepted standards. Sexual abuse may be perpetrated by adults or carried out by children.
This includes intentionally touching, either directly or through clothing, the genitals, anus, or breasts of a child for reasons not related to providing hygiene or medical care. Sexual exploitation is an additional form of sexual abuse and includes allowing a child to engage in prostitution or pornographic photographing or filming.

Youth produced sexual imagery is where children produce a naked or semi-naked image, video or themselves and share it with another person. Children and young people may consent to sending a nude image of themselves. They can also be forced, tricked, or coerced into sharing images by other young people or adults online. Whether a child or young person shares an image consensually or not, they have no control over how other people might use or share it. They may experience bullying or isolation if the image is shared around peer groups. Perpetrators of abuse may circulate a nude image more widely and use this to blackmail a child or groom them for further sexual abuse.

Possible indicators of Sexual Abuse may include, but are not limited to:

- Sexualized behavior or play
- Reports of genital or anal soreness
- Showing fear or distrust of a particular adult

Emotional Abuse

Emotional abuse is any behavior that impairs the child's emotional development, sense of self-worth, or self-esteem such as constant criticisms, threats, verbal rejection, name-calling, insults, ignoring, isolation on a regular basis.

Neglect

Neglect is the persistent failure to meet a child's basic physical or physiological needs. Neglect includes failure to provide food, shelter, clothing, support with hygiene needs, or appropriate supervision. Neglect also includes failure to provide necessary medical or mental health treatment.

Affluent neglect refers to the neglect experienced by children in wealthy families. Affluent neglect can occur when parents and guardians employ staff (e.g. Ayi's, drivers, etc) to look after their children which can sometimes result in a child being neglected.

Possible indicators of Neglect may include, but not limited to:

- Cognitive and academic delays and difficulties with attention
- Extreme lack of personal hygiene and medical care
- Fatigue and hunger
- Disclosures that the child is being left alone for extended periods to a degree which is not appropriate to the developmental age appropriateness of the child
- Parents cannot be contacted in an emergency
- Child may stay at school after hours or not want to go home

Grooming

Behavior in which a person deliberately tries to befriend a child, make an emotional connection, and manipulate them with the purpose of sexually abusing them. Grooming behaviors can be difficult to identify because on the surface they may seem like ordinary supportive behavior.

Possible indicators of 'grooming' behavior may include, but not limited to:

- Befriending a vulnerable student
- Giving the student special attention
- Treating the student more favorably than others, for example with schoolwork or in extracurricular activities, individual coaching
- Giving gifts to, or doing favors for, the student
- Sharing secrets with the student
- Arranging opportunities to be alone with the student
- Sending digital messages of a personal nature
- Making personal comments to the student about sexuality or relationships
- Acting as a substitute parent or confidant of the student
- Befriending the student's family and visiting the family home
- Offering to babysit or provide transport
- Offering individual coaching or special help to the student

Child-on-child Abuse

Sometimes also known as peer-on-peer abuse, this is any form of abuse which occurs between children. This includes bullying, physical altercations, sexual misconduct, and coercion by one child or group of children towards another.

Reporting Safeguarding Concerns

Safeguarding is **everyone's** responsibility. All members of the BCIS community have a responsibility to report safeguarding concerns and must not assume that another person has already done so. This responsibility also applies to any activities occurring off-site which are organized by BCIS staff members. To fulfil this responsibility effectively, all actions must be child-centered. This always means that staff and community members must act in the best interests of the child.

Reports can be made by any student, staff member, parent, or community member. This aligns with the BCIS 'Speak Up, Speak Out' (whistle blowing) policy outlined in the Academic Personnel Manual.

Students

Students can report any concerns to a staff member.

BCIS Staff



When possible, use the Safeguarding Incident Form. When completing the form, care must be taken to ensure that the language used is objective and not colored by the emotion of the person completing the form. If the form is inaccessible, report any concerns directly to a Designated Safeguarding Lead.

If you are unsure that the concern you are reporting is related to safeguarding, BCIS takes the stance of 'If in doubt, report'. Please report your concerns even if you are not certain that it is a safeguarding issue. It is better to be overly vigilant than risk the welfare of a child.

BCIS Community Members

Other members of the BCIS community, such as parents and visitors, will report concerns directly to a Designated Safeguarding Lead or if they are unable to locate them, to a BCIS staff member who will then submit a Safeguarding Incident Form.

Enrichment Activity (EA) Providers

If an EA provider has a safeguarding concern, they will report this to the Athletics and Activities team who will then complete a Safeguarding Incident Form with them.

Immediate Danger

If a child is in immediate danger of harm or abuse, contact a Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) immediately. Do not leave the child alone, either bring them with you or leave them with another trusted adult. The DSL or DDSL will then work with the person reporting the incident to complete a Safeguarding Incident Form.

If an incident involving immediate danger occurs on campus after scheduled school hours and there is not DSL or DDSL present on campus, the reporting staff member is responsible for ensuring that the child remains safe. The reporting staff member should contact an available DSL or DDSL as soon as possible.

If you have a mental health concern about a child

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. If you have a mental health concern about a child that is also a safeguarding concern, report it using the **Safeguarding Incident Form**.

Disclosures of suicidal ideation should be considered an immediate danger and should be reported as such.

If you have a mental health concern that is not also a safeguarding concern, speak to a school counselor to agree upon a course of action.

If you have concerns about a Designated Safeguarding Lead

If you have a safeguarding concern relating to a Designated Safeguarding Lead, report this to another Designated Safeguarding Lead or the Head of School. If your concern is about the Head of School or Director of Frontier Education, report this to the Board of Trustees member responsible for Wellbeing and Safeguarding. Where a safeguarding concern involves the Head of School, responsibility for oversight of the safeguarding response will pass to the Board Member responsible for Wellbeing and Safeguarding.

Confidentiality

All safeguarding concerns are confidential and must be handled sensitively. Information will be shared on a need-to-know basis where necessary. Timely information sharing is essential to effective safeguarding, and concerns about confidentiality must not stand in the way of promoting welfare and protecting the safety of children.

The Designated Safeguarding Lead (DSL) will share information relating to safeguarding concerns with relevant staff on a need-to-know basis only. Staff should not expect to receive feedback or follow-up information regarding a safeguarding report they have made unless this is necessary for them to fulfil their safeguarding responsibilities.

External Organizations

In situations where there is an immediate risk of harm, or where individuals feel unable to report concerns through internal channels, the following external organizations may be contacted:

Police Emergency Hotline – 110
(For immediate danger or criminal activity)
All-China Women's Federation Hotline – 12338
(Support and advice on domestic violence and safeguarding concerns)
Psychological Aid Hotline – 12356
(Mental health and emotional support services)

Where possible, safeguarding concerns should also be reported through the organization's internal safeguarding procedures. However, external reporting should not be delayed if there is a risk of immediate harm.

Responding to Disclosures

It is important for staff members to be aware of how children disclose and how to respond in the most appropriate manner.

If a student tells a staff member about being abused or harmed:

Do

- Listen attentively, actively and without judgment.
- Stay calm.
- Let the child use their own words.
- Reassure the student that they have done the right thing by telling you.
- Ask open ended, non-leading questions. E.g. 'Can you tell me more about that?', 'What happened next?'
- Be honest about your responsibility to act. Explain what will happen next and that you will have to pass this information on.

Do Not

- Act shocked or upset.
- Ask leading or probing questions.
- Promise to keep it a secret.
- Discuss the situation with parents, care givers or others (unless directed to by the Designated Safeguarding Lead)

Remember that some children may:

- Not feel ready or know how to tell someone that they are being abused, exploited, or neglected.
- Not recognize their experiences as harmful.
- Feel embarrassed, humiliated, or threatened.

Report the disclosure using the **Safeguarding Incident Form** as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.

Roles and Responsibilities

All members of the BCIS community are responsible for safeguarding. They do this by working together to create a safe and secure environment for our students, as well as by reporting all concerns as they occur. Within BCIS there are specialized roles and groups who have additional responsibilities to ensure that safeguarding is integrated into the daily running of the school and ensure timely and appropriate responses to all safeguarding concerns.

Designated Safeguarding Leads

The Designated Safeguarding Lead (DSL) takes responsibility for safeguarding and child protection within an area of the organization. Within BCIS The Head of School takes overall responsibility for safeguarding at BCIS. The Principal and Deputy Principal will serve as Designated Safeguarding Lead and Deputy Safeguarding lead for each school division. The Director will serve as Designated Safeguarding Lead at Frontier Education.

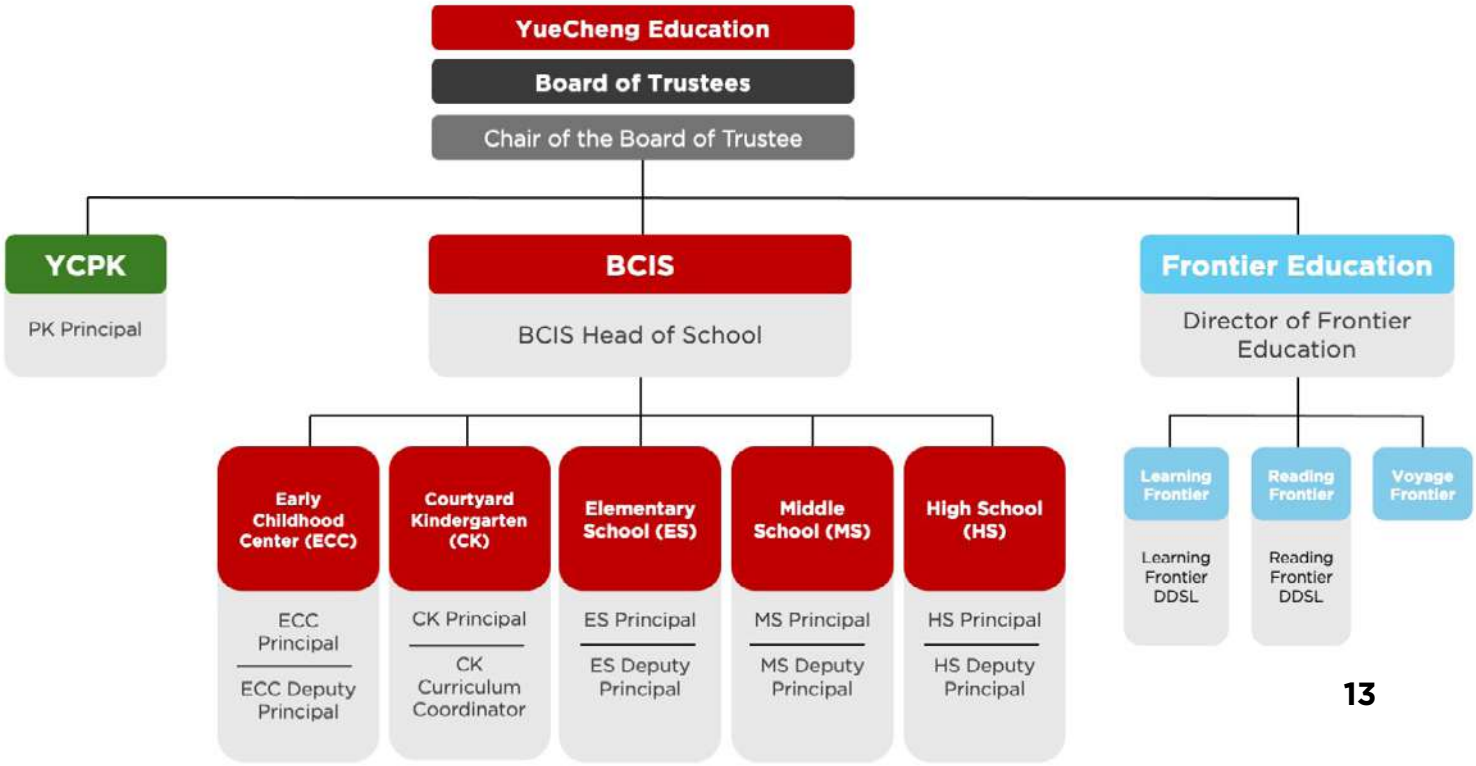
Designated Safeguarding Leads are responsible for:

- the implementation of the BCIS Safeguarding Policy
- reviewing all safeguarding concerns reported in their division
- acting in line with the BCIS Safeguarding Policy in instances where harm, abuse or neglect has occurred
- liaising with outside agencies where appropriate

Deputy Designated Safeguarding Lead (DDSL)

A member of staff designated to support the Designated Safeguarding Lead and undertake safeguarding responsibilities in accordance with this policy.

Table 1. The DSL and DDSLs for BCIS and the wider YueCheng Education community.



Safeguarding Committee

Led by the School Wide Safeguarding Team Lead, the safeguarding committee is responsible for annually reviewing the BCIS Safeguarding Policy and suggesting changes based on recommendations from members of the BCIS community and international best practice. This committee works with the Designated Safeguarding Leads to facilitate safeguarding training.

This committee is made up of at least one member of the leadership team from each division and other BCIS staff who are volunteers.

Safeguarding Response Team (SRT)

The Safeguarding Response Team may be convened by the DSL or DDSL to manage Safeguarding Cases.

Board of Trustees

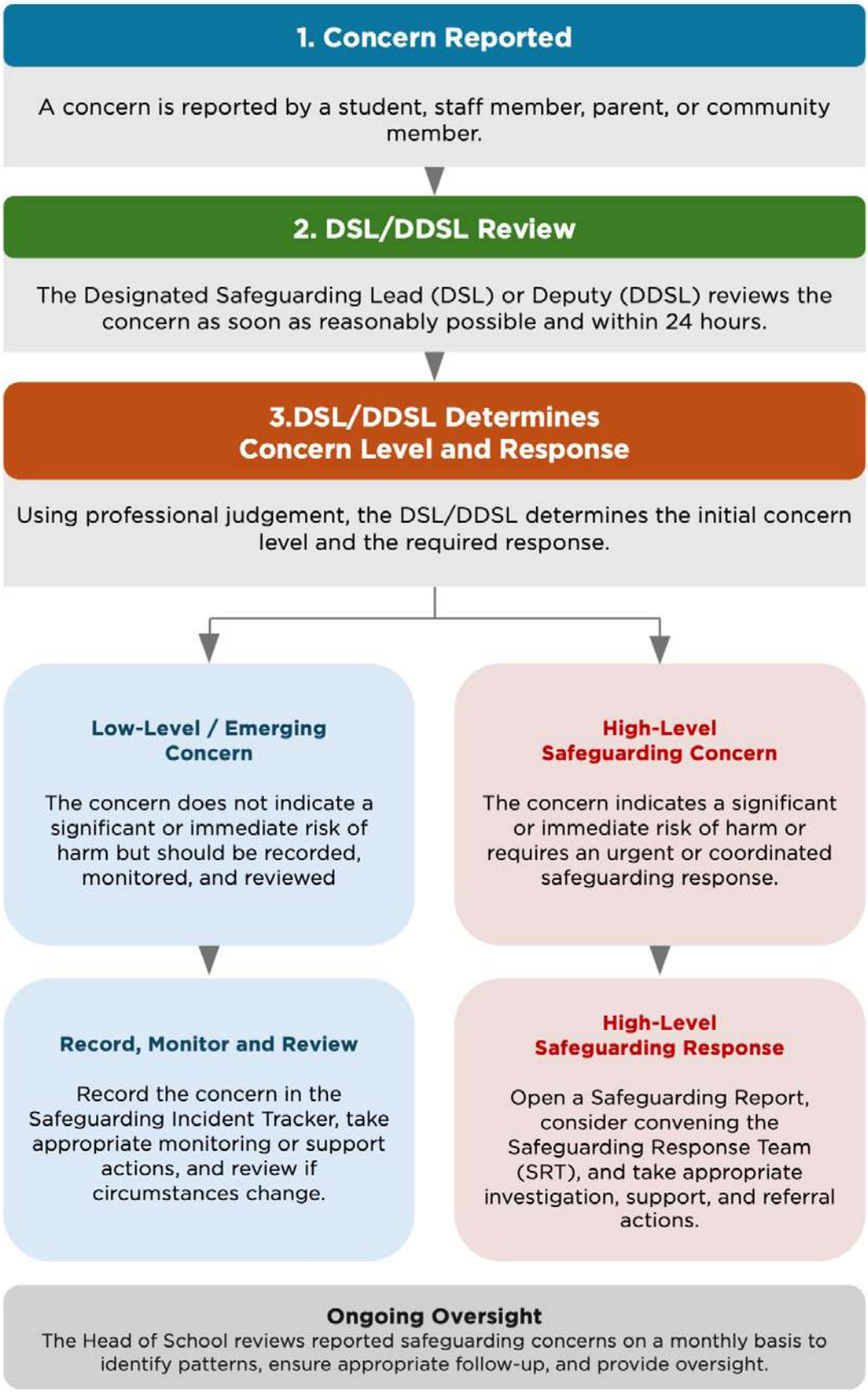
The Board of Trustees has full authority for all matters concerning BCIS' governance. The Board of Trustees is responsible for reviewing and approving all BCIS safeguarding policies. Within the Board of Trustees, there is a designated member who takes responsibility for Wellbeing and Safeguarding.

The BCIS Head of School and the Director of Frontier Education report to the BCIS Board of Trustees.

Director of Athletics and Activities

The Director of Athletics and Activities will oversee Enrichment Activities (EA) for the school and is the primary point of contact for EA providers should they have a safeguarding concern. Their role is as a liaison, directing concerns to the appropriate DSL, and notifying them in the event of an immediate danger. The Director of Athletics and Activities is supported by the Activities Office team who are also able to support EA providers to report any safeguarding concerns.

Responding to Safeguarding Concerns



When a safeguarding concern is reported, the DSL or DDSL must review the concern as soon as practically possible and ordinarily within 24 hours. The DSL has primary responsibility for determining the appropriate safeguarding response.

Safeguarding concerns are classified according to the nature, seriousness, and level of risk identified. The classification reflects the information available at the time of review and must be kept under review. A concern may be escalated or de-escalated if further information emerges or circumstances change.

When reviewing a concern, the DSL or DDSL must record the following information on the BCIS Safeguarding Incident Tracker:

- the date the concern was reviewed
- the concern level assigned
- any actions taken or required

The Head of School will review reported safeguarding concerns monthly to provide an additional layer of oversight, identify patterns or recurring concerns, and ensure appropriate follow-up and accountability.

Safeguarding Concern Levels

Low-Level / Emerging Safeguarding Concern

Low-Level or emerging concerns are concerns that do not currently indicate a significant or immediate risk of harm, but which should be recorded, monitored, and reviewed to identify patterns, changes in circumstances, or potential escalation.

Examples may include:

- A minor or isolated concern about a child's wellbeing or behavior where there is no indication of abuse or neglect
- An emerging concern that does not meet the threshold for a High-Level safeguarding response
- A concern relating to a child's circumstances that may affect their wellbeing but does not currently indicate significant risk of harm
- A Low-Level concern about the behavior of an adult towards a child that does not indicate abuse or immediate risk, but which should nevertheless be recorded and monitored
- A concern that, when considered alongside existing information, may warrant monitoring for patterns or escalation

Appropriate next steps for Low-Level concerns may include monitoring, speaking with relevant staff or parents/carers where appropriate, pastoral support, further information gathering, or escalation if additional concerns arise. These steps are recorded within the BCIS Safeguarding Incident Tracker.

High-Level Safeguarding Concern

High-Level Safeguarding Concerns are concerns where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, or where the circumstances require an urgent or coordinated safeguarding response.

Examples may include:

- Clear or credible evidence indicating abuse or neglect
- A high or immediate risk of significant harm
- Repeated, persistent, or escalating safeguarding concerns that indicate an increasing level of risk
- A disclosure or allegation of abuse requiring an urgent safeguarding response
- Concerns requiring a coordinated investigation or response involving multiple members of staff or professionals
- Concerns that may require referral to or involvement of external safeguarding agencies or other statutory services
- Possible criminal conduct involving a child
- Any situation in which immediate protective action may be required to safeguard a child

A High-Level Safeguarding Concern will always require a High-Level Safeguarding response

High-Level Safeguarding Response

A High-Level Safeguarding Response is the school's formal process for managing High-Level Safeguarding Concerns.

When a High-Level Safeguarding Response is initiated, the DSL must inform the Head of School (unless the head of school is the individual indicated in the safeguarding concern) immediately and create a Safeguarding Report to record all steps taken regarding the concern.

Safeguarding Response Team (SRT)

The purpose of the Safeguarding Response Team (SRT) is to support the DSL or DDSL in reviewing serious or complex safeguarding concerns, determining appropriate actions, ensuring decisions are documented, and coordinating any required investigation or external referral.

A High-Level Safeguarding Concern does not automatically require a Safeguarding Response Team (SRT). The DSL will determine, using professional judgement, whether a Safeguarding Response Team (SRT) is required. Factors may include the complexity of the concern, the actions required, and the need for coordination with staff, departments, or external agencies.

Membership of the SRT will vary depending on the nature of the concern, it will always include the Head of School and the DSL / DDSL for the division and may include divisional leadership, school counselors, medical personnel, teachers, advisors, or other relevant staff as needed.

The SRT is chaired by the HoS, DSL, or DDSL for the relevant division.

Investigation and Documentation

The Safeguarding Report serves as the formal record of:

- information reviewed
- actions taken
- decisions made
- persons responsible for follow-up actions
- agreed timelines
- subsequent outcomes

All actions, investigations, meetings, consultations, and referrals related to the case must be recorded in the Safeguarding Report.

All safeguarding records must be factual, objective, and completed in a timely manner. Staff should record observed facts, disclosures, and actions taken, avoiding speculation, assumptions, or personal opinions wherever possible. Where appropriate, the child's own words should be recorded.

Possible Response Actions

Following review, the HoS and DSL/DDSL may determine that one or more of the following actions are appropriate:

- further investigation
- meetings with the child or family
- referral to external services
- consultation with legal advisors
- consultation with relevant government agencies
- notification of sponsoring employers where appropriate
- consultation with consular representatives where appropriate
- implementation of procedures outlined in the BCIS Academic Personnel Manual
- sharing relevant information with staff on a need-to-know basis
- referral to the police or other authorities where required

Follow Up and Case Closure

In cases requiring a High-level Safeguarding Response, the DSL, DDSL, or another designated member of the Safeguarding Response Team may maintain appropriate contact with the child and family, coordinate support, monitor progress, and liaise with relevant professionals where necessary.

A High-Level Safeguarding Response may be closed when the DSL or DDSL determines that:

- all agreed actions have been completed
- any required referrals or consultations have occurred
- identified risks have been appropriately managed
- appropriate records have been completed
- no further safeguarding action is required at that time

The Safeguarding Response Team may conduct a review meeting following case closure to evaluate the school's response and identify any improvements to safeguarding practice. A safeguarding case may be re-opened at any time if new information emerges.

Procedures for Allegations made about BCIS Staff

If an allegation is raised about a BCIS staff member and there is reasonable cause to believe that a child may be at risk of harm, the school may remove the employee from duties, suspend the employee, or implement alternative arrangements while the matter is reviewed, in accordance with the BCIS Academic Personnel Manual.

Where concerns are substantiated, disciplinary action will be taken in accordance with the **BCIS Academic Personnel Manual.**

Prevention Measures

Safeguarding at BCIS Sites

To promote a culture of proactive safeguarding practices, BCIS sites will display posters reminding all staff and visitors about key safeguarding practices and with a link to the **Safeguarding Incident Form.**

Age-appropriate posters will also be displayed around BCIS campuses, encouraging children to report any concerns to a trusted adult.

Use of Bathrooms and Changing Facilities

BCIS is committed to ensuring that bathrooms and changing facilities are safe, well-supervised, and appropriate for all users.

Bathrooms and changing rooms across BCIS sites use a color-coded system to clearly indicate who may use each space:

- **Blue Doors – Student facilities**
  These facilities are designated for student use only. Students are expected to use these independently, where age appropriate. Adults must not enter student facilities at any time.
- **Red Doors – Adult facilities**
  These facilities are for adult use only and must not be used by students.
- **Green Doors – Family facilitiesor all gender toilets**
  These facilities are designated for use by adults supporting younger students (Grade 1 and below) who require assistance with changing or personal care. These spaces are not intended for independent student use during the school day.

Additional safeguarding measures apply:

- Cleaning staff may access student facilities as part of their duties but must not enter when these spaces are in use by students. Cleaning is scheduled to minimize contact, and signage will indicate when cleaning is taking place.
- Doors to changing rooms and bathrooms should be kept closed during use to promote privacy and promote safeguarding principles.
- All members of the school community are expected to follow signage and guidance regarding appropriate facility use at all times.

Positive Touch

Positive touch is a form of physical touch which staff members can use to physically interact with the children they work with but do so in a way which is respectful and appropriate for an educational context. This type of touch should be respectful and limited to safe areas of the body, such as the extremities or back. Whenever a staff member touches a child or young person, there is a risk that it could be misunderstood. This may lead to allegations about their professional conduct. By using positive touch, staff can feel empowered to interact with children in a positive way that also minimizes the risk of accidental misconduct occurring.

All actions by staff at BCIS should be child centered, and any touch which is posing as therapeutic, but which is actually being used to satisfy the staff members need for contact rather than that of the child is inappropriate and will be considered a safeguarding concern.

Examples of positive touch include:

- high-fives
- pat on the back
- gentle shoulder squeeze
- hand holding
- side hugs
- gentle nudge
- fist bump
- guiding touch (touching the back or arms to gently support a child to transition to another space)

Examples of actions which are not positive touch include:

- any physical contact that is not welcomed or initiated by the child, such as grabbing hands or arms without consent
- pushing or any forceful physical contact
- grabbing and holding of a child's arm or clothing to move them without their consent
- any hug that the child feels is uncomfortable, overly tight, or invasive
- laying on the floor with a child
- genital contact for any reason not related to intimate care
- coercive touch such as forcing a child to participate in physical activities, such as making them sit on your lap

Positive Touch Guidelines for Nap Time in Early Years Settings

During Nap Time:

Do

- make all physical contact suitable for the child's age and development
- sit next to the cot on a chair or cushion
- ensure that staff members and children are visible to other staff members
- gently tap children to sleep on their backs ensuring staff members' hands are visible

Do Not

- force children to follow instructions with requests through physical contact
- lie next to a child on another cot or cushions
- position yourself in a way that makes you unobservable by other staff members

Intimate Care

Intimate care is a term used to describe activities involved in meeting the personal care needs of a child. It includes providing care which requires direct or indirect contact with, or exposure of, private parts of the body, such as:

- changing nappies, underwear, continence pads or sanitary wear
- helping a child use the toilet
- bathing, showering or washing

Basic Principles

- Where possible, intimate care should be provided by one person to protect the child's dignity. However, in some cases, two adults may need to be present e.g., if they need to operate equipment such as a hoist.

- Staff who provide intimate care should always ask permission to assist the child they are supporting, explain what they are doing, and communicate with the child in a way which supports them to be informed and have agency.

- When providing intimate care, you should speak to the student personally by name, seek consent wherever possible, encourage independence and offer choice.

- If a child becomes distressed or unhappy about being cared for by a particular member of staff, this should also be discussed with the class teacher and principal.

During intimate care, children will:

- feel safe and comfortable with the adults providing their care
- have their body autonomy, privacy and dignity respected
- be actively engaged in care procedures relating to them, and have opportunities to make choices and give consent
- have their feelings about the care they receive recognized and respected
- be encouraged and supported to become independent where possible
- are protected from all forms of abuse

Intimate Care Locations

Intimate care around changing soiled clothing will take place in spaces which are private enough to respect the child's dignity, but which allow the staff member providing the care to be seen at all times. No staff member should be alone with a child behind a closed door when assisting with intimate care.

Procedure for Providing Intimate Care

1. Determine whether the child can complete any aspect of the task independently and encourage them to do as much as possible themselves.
2. Conduct intimate care in an appropriate location that protects the child's dignity while maintaining visibility to other staff.
3. Provide verbal guidance before physical assistance wherever possible and explain what support is being provided.
4. Provide any physical intimate care required while respecting the child's privacy, dignity, and autonomy.
5. Place any soiled clothing in a sealed bag and return it to the parent/carer.
6. Ensure appropriate hygiene practices are followed after care is provided.
7. Report any safeguarding concerns arising during intimate care in accordance with this policy.

Safeguarding Curriculum Integration

As part of the Safeguarding measures provided by BCIS, students are taught about being safe, appropriate relationships, recognizing and reporting abuse and understanding protective strategies. This is laid out in the **BCIS Personal Social Physical Health Education and Child Safety Curriculum.** This curriculum is based on best practices as laid out by the **Keeping Safe Curriculum** and the **United Nations International technical guidance on sexuality education.** The Chinese National Curriculum Standards and Early Years developmental guidelines were also cross-referenced. The core message communicated is that we all have the right to be safe, and that we can help ourselves to be safe by talking to people we trust.

BCIS is committed to cultivating a culture of zero-tolerance of sexism, prejudice towards different gender and sexual identities, and all forms of sexual violence and harassment.

Photography and Sharing of Images

BCIS staff may take photos of students for the purpose of recording learning and those photos may be shared internally. It is acceptable for staff to use their personal devices to take such photos in the context of normal BCIS activities. However, this media should be deleted within 24 hours from the devices once it has been uploaded in the appropriate repository.

BCIS staff members are responsible for the security of the content on their devices. Any sharing of media or other privileged information outside of BCIS (without written consent from parents/guardians) will be considered professional misconduct. This misconduct will be dealt with in line with policies outlined in the **BCIS Academic Personnel Manual.** Therefore, where possible, BCIS recommends that staff should use school managed devices to reduce the risk of unauthorized access or accidental distribution of privileged information.

Non-staff community members are asked to not take photos, video/recordings, or live-stream of children whilst on BCIS sites. Exceptions to this are for community events such as school performances in which community members are asked to exercise their best judgment as to whether the photo is appropriate. If any BCIS community members are found to be taking photos which are deemed inappropriate by staff this will be treated as a safeguarding concern and reported.

Data Protection, Cybersecurity, and Online Safety

We recognize the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. Online safety practices, including risks associated with sharing information, protecting personal data are integrated with the **BCIS Personal Social Physical Health Education and Child Safety Curriculum.** BCIS uses a firewall to filter internet content and block access to inappropriate sites.

Detailed information about procedures relating to ensuring that internet and BCIS network traffic is monitored is outlined in the **BCIS Department of Technology Standard Operational Procedures.**

All members of the BCIS community have a responsibility to use technology in a responsible way. These responsibilities are outlined in the **BCIS Digital Citizenship Responsible Use of Technology Policy, Learning Technologies at BCIS Responsible Use Policy, and the BCIS Code of Conduct.**

Recruitment of New Staff

To ensure BCIS recruits suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safeguarding screening training and are following recruitment practices laid out in the **BCIS Academic Personnel Manual.**

All employees, external contractors, Enrichment Activity (EA) providers, Week Without Walls (WWW) providers, and other adults engaged to work directly with students without direct supervision from BCIS staff must provide a copy of government-issued identification and evidence of a criminal background check completed within the previous 12 months prior to working with BCIS students.

Safeguarding for Offsite Activities

The same safeguarding expectations, responsibilities, and reporting procedures outlined in this policy apply to all BCIS-organized off-site activities. Staff and other members of the BCIS community are expected to follow the BCIS Safeguarding Policy and Code of Conduct whenever they are responsible for students off campus.

All off-site activities must be planned and supervised in accordance with relevant BCIS risk-assessment and trip procedures.

Training for Staff and the BCIS Community

All members of the BCIS community are expected to contribute to a safe environment for children. Safeguarding training and awareness requirements are proportionate to each individual's role and level of responsibility. These training requirements are renewed annually.

Group	Members	Requirements
Visitors and Community Members	Families, visitors, alumni, prospective families, contractors	Read and comply with the BCIS Code of Conduct and Visitor Guidelines.
Support Staff and External Providers	Ayis, drivers, catering staff, maintenance staff, extracurricular providers, WWW providers	Read the BCIS Code of Conduct and Safeguarding Policy and participate in BCIS safeguarding training.
Academic and Administrative Staff	Teachers, teaching assistants, administrative staff, Board members	Read the BCIS Code of Conduct and Safeguarding Policy, participate in BCIS child protection training, and complete an approved online safeguarding course provided by the school.
Designated Safeguarding Leads	Head of School, Frontier Director, Principals, Deputy Principals, DSLs and DDSLs	Complete all staff safeguarding requirements and Designated Safeguarding Lead training.

Staff Training

Staff training will take place at the beginning of each academic year and at the start of Semester 2. Staff joining during the academic year will complete safeguarding induction as part of the onboarding process.

Training completion records will be maintained by Human Resources and the Whole School Safeguarding Team Lead. Failure to complete required training may result in disciplinary action in accordance with the Academic Personnel Manual.

Intimate Care Training

Staff responsible for providing intimate care must complete safeguarding and intimate care training. This training will be provided annually and will cover intimate care procedures, diaper changing, and safe supervision practices during nap times.

2026/27 Safeguarding Team

Role	Name	Email
Board of Trustees member responsible for Wellbeing and Safeguarding	He Lantian	He.Lantian@bcis.cn
Head of School (BCIS)	Tom Egerton	Tom.Egerton@bcis.cn
Director of Frontier Education	Tara Li	Tara.Li@readingfrontier.com
Learning Frontier Deputy Designated Safeguarding Lead	Rachel An	Lili.An@learningfrontier.cn
Reading Frontier Deputy Designated Safeguarding Lead	Tracy Deng	Tracy.Deng@readingfrontier.com
Yuecheng Parkside Kindergarten Principal	Coco Qin	Coco.Qin@ycekg.cn
Early Childhood Center Principal	Jackie Becher	Jackie.Becher@bcis.cn
Early Childhood Center Deputy Principal	Jess Hertz	Jess.Hertz@bcis.cn
Courtyard Kindergarten Principal	Suzanne McKemey	Suzanne.Mckemey@bcis.cn
Courtyard Kindergarten Curriculum Coordinator	Qiongqiong Wu	Qiongqiong.Qu@bcis.cn
Elementary School Principal	Fred Schafer	Fred.Schafer@bcis.cn
Elementary School Deputy Principal	Yooah Nguyen	Yooah.Nguyen@bcis.cn
Middle School Principal	Lucy Allsopp	Lucy.Allsopp@bcis.cn
Middle School Deputy Principal	Paul Lamoureux	Paul.Lamoureux@bcis.cn
High School Principal	Scott Garren	Scott.Garren@bcis.cn
High School Deputy Principal	Fiona Chen	Fiona.Chen@bcis.cn
Campus Management Senior Manager	Shirley Ke	Shirley.Ke@bcis.cn
Director of Athletics and Activities	Aldo Gutierrez	Aldo.Gutierrez@bcis.cn
Whole School Safeguarding Team Leader	Ben Wright	Ben.wright@bcis.cn

Updates for 2026-27 BCIS Safeguarding Policy

- "Child Protection Incident Form" renamed "Safeguarding Incident Form" throughout the policy.
- Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) added to the Definitions section.
- Safeguarding organizational charts updated to reflect current school structure.
- Reporting procedures for extracurricular activities updated so that all safeguarding concerns are routed through the Activities Office, creating a clearer reporting pathway.
- Safeguarding response procedures substantially revised, including the introduction of Low-Level/Emerging Concerns, High-Level Safeguarding Concerns, use of the Safeguarding Incident Tracker, and clearer procedures for High-Level Safeguarding Responses.
- Governance and oversight procedures strengthened through monthly Head of School safeguarding reviews and revised procedures for concerns involving senior leaders.
- External organizations section added to ensure that community members have access to safeguarding support in addition to that provided by the school.
- Use of Bathrooms and Changing Facilities section substantially revised, including the introduction of colour-coded facility signage and additional safeguarding guidance.
- The former Positive Touch and Intimate Care Policy has been integrated into the Safeguarding Policy.
- New Safeguarding for Offsite Activities section added to clarify safeguarding expectations and responsibilities during trips, Week
- Without Walls (WWW), internships, and other offsite activities.
  Staff training and onboarding language updated to improve clarity and alignment with Human Resources procedures.
- Safeguarding Team section updated to reflect current safeguarding personnel and moved to the end of the document.
- Annual review and version history section added to improve document governance and provide a clear record of policy development over time.




SCHOOL
楼
BCIS Reception
前台

BCIS

BEIJING CITY INTERNATIONAL SCHOOL

北 京 乐 成 学 校

BCIS Main Campus
北京乐成学校

+86 10 87717171
admissions@bcis.cn
No.77 Baiziwan Nan Er Road, Chaoyang District, Beijing
北京市朝阳区百子湾南二路 77 号

BCIS ECC Campus
北京乐成学校幼儿园

+86 10 67700766
admissions@bcis.cn
No.11 Dongbai Street, Chaoyang District, Beijing
北京市朝阳区东柏街 11 号

BCIS CK Campus
北京乐成学校四合院幼儿园

+86 10 87751725
YCCKadmissions@bcis.cn
No. 6 West Lane, Shuangqiao Street, Chaoyang District, Beijing
北京市朝阳区双桥街西巷 6 号

www.bcis.cn

BCIS PK Campus
乐成公园幼儿园

+86 10 67751725
YCPKadmissions@yuechengeducation.com
No. 23 Banbidian Street, Tongzhou District, Beijing
北京市通州区半壁店大街 23 号

www.yuechengpk.com

BCIS WeChat

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