

Code of Practice for Private Schools

2 March 2026

Education Bureau

Background

- In the 2025 Policy Address, the Chief Executive announced the formulation of the **Code of Practice for Private Schools** (the Code) and the publication of the **Private School List**, with a view to improving the standards of private school operation.
- Released on 30 January 2026
- 7 chapters
 - Chapter 1: General Principles
 - Chapter 2-5: Management and Organisation
 - Chapter 6-7: Learning and Teaching, Student Affairs

Designated Webpage on Private Schools Offering Formal Curriculum

<https://www.edb.gov.hk/en/private-school-formal-curriculum>

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Private Schools Offering Formal Curriculum

- Code of Practice for Private Schools

● [Code of Practice for Private Schools \(January 2026 Pilot Version\)](#)

● [EDBC No.1/2026 on Code of Practice for Private Schools](#)



Chapter 1

General Principles

Basis of formulation and objectives

- Formulated based on the **Education Ordinance (Cap. 279) (EO)** and the **Education Regulations (Cap 279A) (ER)** to provide management and operational guidelines.
- Objectives:
 - Establishing **standards** and ensuring **quality**
 - **Student-centred** approach and safeguarding students' well-being
 - Enhancing **transparency** and promoting **accountability**
 - Promoting quality and encouraging **innovation**

Scope of applicability

- Applicable to **all private secondary and primary schools** (including international schools) which are registered or provisionally registered under the EO and **offering formal curriculum**.
- **Basic requirements** on good practices.
- Apart from adhering to the Code, schools must comply with all relevant requirements under the laws and regulations of Hong Kong.

Effect

- Set out the **basic requirements for good practices** and provide guidelines to assist schools in operating in compliance with legislations and guidelines as well as promote self-discipline.
- Complement EDB policy circulars, guidelines, and administrative instructions, collectively forming the basic **regulatory framework** for schools.
- Does not replace or diminish the effect of any existing legislation.
- Be a **reference basis for school inspections, and monitoring and supporting schools.**

Compliance with the Code will be considered as one of the important factors in assessing the **overall performance of schools.**

Chapter 2

School Management

Overview

- All schools are governed by the **EO** and **ER**, as well as other relevant legislations and instructions issued by EDB from time to time.
- Be **accountable to stakeholders** for the effectiveness of their operations and proper use of resources.

Governance structure and responsibilities

- Each school is managed by its **SMC**. SMC shall ensure that:
 - the school is **managed satisfactorily**;
 - the **education of the students is promoted in a proper manner**;
and
 - the school fully complies with the EO, ER, EDB circulars and other related legislations.
- School managers should be registered and school supervisors should be appointed as required by the EO.

Operation and decision-making of school

- Operate under the premise of **promoting the students' education**, in a manner that complies with the all legislations and the requirements of EDB, and be accountable to stakeholders.
- Formulate open, fair and transparent **school-based policies**, and keep stakeholders informed.
- Implement the National Security Law, review continuously and strengthen the **measures** related to **safeguarding national security** and **national security education**.

Financial management, collection of fees and accountability

- Schools must apply to EDB for **approval** under the EO and ER to collect **school fees, funds for long-term school development** (e.g. capital levies, debentures, and nomination right fees), and other charges (such as various **miscellaneous fees, application/registration fee**).
- The annual school fees charged by the school should **not be excessive** having regard to the cost of school operation and to the standard of education provision.

Question and Answer 1

Q: Are private schools allowed to entrust third parties

- to recruit or hire teachers through service procurement, or
- to contact prospective students/ parents through other schools/agencies?

A: The key lies in ensuring **the accountability of private schools**.

- Where a course is operated by a private school, the school has to provide the course in accordance with the approved curriculum and **remain responsible for its provision and management**.
- This includes ensuring **teachers** meet qualifications requirements, managing **student admissions and attendance**, collecting **fees** according to the Fees Certificate, and issuing the receipts.
- In addition, schools and any third-party entities must not violate Sections 86A and 86B of the EO in their **promotional materials and advertisements**.



Prohibition on collaborating with other entities to offer formal curriculum (2)

- Unless approved by EDB in prior, school **must NOT**
 - **allow** any entity other than the school (“other entities”) to **offer formal curriculum** (including public examination courses) **in the name of the school** in any manner;
 - **collaborate with, or assist** other entities in offering formal curriculum (including public examination courses) in any manner; and
 - **arrange** for parents or students **to pay fees for education courses** to any person or entity apart from the school.

In case a school discovers that any person claims that an unauthorised entity has any form of collaborative relationship with the school
→ promptly submit a real-name **report to EDB** as far as practicable.

Promotion requirements

- Any advertisement (including promotional leaflet or webpage) shall NOT
 - claim the school is operating in premises **other than the premises specified** in the certificate of registration or provisional registration of the school, or
 - contain any other information otherwise concerning the school which is **false or misleading**.

Internal control and decision-making

- Put in place a **proper internal control and reporting mechanism** with rigorous checks and balances in order to ensure that the school operation is satisfactory.
- Formulate, review regularly and update **school-based policies** and procedures for major matters, and keep proper records, and ensure their accessibility.
- Attach importance to **integrity management**; formulate and implement various measures to prevent corruption.
- Ensure **stable rights to use school premises**.

Chapter 3

Financial Management, Fees and Internal Control

Management of school fees

- The annual school fees shall be
 - calculated on an **equal monthly basis** and
 - collected **on or after the first school day of each month** of the period during which the course is conducted.
- **The first monthly instalment** may only be **collected no earlier than 1 month** before the commencement of the educational course.
- To adjust their school fees for the new school year, submit written applications to EDB at least 4 months before the commencement of the new school year.



Charges collected to raise funds for long-term school development

- Capital levies, debentures and nomination rights fees, etc. for long-term financial needs of learning and teaching, school development, school facilities and infrastructural projects, etc.
- Comply with the following and apply to EDB in advance.
 - Education Regulations
 - [EDB Circular No. 15/2023 “Application and Approval Mechanism for Collection of Other Charges by Private Schools”](#)
- Without receiving EDB’s prior approval in writing, the school should not charge any such fees.



Other miscellaneous fees

- Charges of mandatory items and/or services in relation to students' education in schools should be **subsumed into the annual school fees** as far as possible.
- Otherwise, applications must be submitted to EDB at least 4 months before the start date of the proposed collection as stipulated in
 - EDB Circular No. 25/2024 “Collection of Other Fees by Private Schools Offering **Local Curriculum**”; or
 - EDB Circular No. 26/2024 “Collection of Other Fees by Private Schools Offering **Non-Local Curriculum**”.



Question and Answer 2

Q: Are private schools allowed to conduct fund-raising activities?

A: ER stipulates that without the permission of PS(Ed):

- (1) No person shall in any school premises appeal to any pupils of a school for subscriptions; or make any collection among any pupils of a school.
- (2) No manager or teacher of a school shall in any way whatsoever appeal for the above subscription or make any collection.

For this purpose, **PS(Ed)** has given schools permission to conduct certain fund-raising activities, including raising funds for own school purposes, charitable institutions exempted from Inland Revenue Ordinance S.88.

For details, refer to the guidelines “**Fund-raising Activities in Schools**”.



Investment management

- Schools should not carry out speculative investment.
- Observe closely the guidance and requirement stipulated in [EDB Circular No. 5/2025 on “Investment by Private Schools”](#)
 - Guidance on financial stability ([operating reserve sufficient to meet 4 months of operating expenses](#), good governance with a long-term financial plan, investment approved by school management)
 - Disclosure requirements on realised investment losses (report and declare losses not charged to school’s accounts.)



Accounting records and financial control

- Schools must submit **annual audited accounts** of their schools to EDB in accordance with the terms of the land leases, government leases, service agreements signed with EDB (if any), etc.
- The management authority of school is required to
 - **keep proper accounts**;
 - make the accounts and any vouchers relating to the accounts **available at all reasonable times** for inspection by EDB; and
 - retain the accounts and vouchers for a period of not less than 7 years.

Internal control system

- It is the responsibility of SMC to determine the accounting and internal control system with regard to its circumstances, ensuring the compliance with the EO, ER and the circulars issued by EDB.
 - Organisation, defining responsibilities and extent of authority at each level of responsibility within the organisational structure
 - Code of ethics for staff involved
 - Authorisation, supervision, segregation of duties
 - Documentation
 - Review mechanism

Chapter 4

Personnel Management

General principles

- SMC is the employer of all school staff and bears the responsibilities to all personnel management matters.
- Lay down clear, fair and transparent personnel policies (recruitment, remuneration, appraisal, promotion, discipline and termination of service, etc.).
 - Make known to all staff
 - Be fair and transparent to avoid any actual or perceived conflict of interest
 - Comply with the EO, ER, Employment Ordinance, Prevention of Bribery Ordinance, Occupational Safety and Health Ordinance and other related legislations

Staff appointment

- Statutory qualification:
 - Requirements for [Registered Teacher/Permitted Teacher](#) in the EO and ER.
- Comply with all the requirements set out in
 - [EDB Circular No. 14/2023 “Measures for Strengthening the Protection of Students: Appointment of Teaching and Non-teaching Staff in Schools”](#).
- Teachers are required to comply with the professional requirements of the EDB or institutions or accreditation institutions affiliated with relevant courses.



Staff appointment (2)

- Request the staff who are **self-employed** or deployed to work in schools by the **outsourced service providers** to:
 - **Declare** any convictions or ongoing criminal proceedings/investigations (locally or abroad) and provide details.; and
 - Undergo **Sexual Conviction Record Check** and pass their check results to schools.

Teacher registration

- Only **registered or permitted teachers** may teach in schools.
- Unless with the permission in writing of PS(E), persons who have had their **teacher registration cancelled/refused** shall not enter or remain in any school.
- Persons whose teacher registration have become **invalid** should no longer teach or take up non-teaching duties in a school and the school should not employ these persons by any means.

Staff conduct, discipline and conflict of interest

- Require/ remind staff to
 - study and comply with EDB's "Guidelines on Teachers' Professional Conduct"
 - report to schools immediately if involved in any criminal investigation or proceeding, and report the outcome upon its conclusion.

Schools must report suspected serious offence/misconduct cases to EDB.

- comply with the Prevention of Bribery Ordinance; do not accept an advantage without the permission of SMC.



Chapter 5

School Premises Safety, Crisis Management and Facilities Management

Basic responsibilities for school premises safety

- SMC is required to ensure that the operation and management of premises comply with the requirements set out in the
 - EO, ER, EDB circulars,

EDB Circular No. 23/2001 on “Safety Nets at Stair Wells in School Premises”: Any [stair wells or other kinds of light wells on school premises](#) may pose a risk for students or school users in falling from height. Schools should construct [safety nets](#) on every floor for the sake of the safety.

- Occupational Safety and Health Ordinance,
- Fire Services Ordinance, and
- any other relevant Ordinances and Regulations.



Fire prevention measures

- Evacuation plans and drills:
 - Draw up a **practical scheme** for the evacuation of the school premises.
 - Ensure that **fire drill** including the use of all exits from the school premises is carried out by the teachers and students at least once in **every 6 months**.
 - Keep a **written record** of all such drills in a school log book.
- Unless with approval, no one shall use naked flame for unapproved activities in any places of the school premises.
- Smoking is prohibited in schools.

Crisis management

- **Set up a Crisis Management Team** to formulate school-based mechanisms, procedures, guidelines and contingency plans, which should be regularly reviewed.
- School crises include the suicide of a student or staff, accidental death, a critical injury, a violent incident and natural disasters which may affect the normal operation of school.
- In the event of a crisis, give due **priority to the safety of all students and staff**, and exercise **professional judgement** to take appropriate actions as the specific situation warrants.

Alterations to school premises and works

- **Approval** by PS(Ed) shall be sought on improvement and extension to school buildings involving **structural alteration and conversion**.
- When developing relocation plans or extension to school buildings plans,
 - allow **sufficient time** for construction works and **processing the applications** of extension of premises (such as new floors or new annex buildings), and
 - develop **contingency plans** to safeguard the interests of students.

Alterations to school premises and works (2)

- Change of room use requiring **prior notice to EDB** of the proposed change of room use:
 - **adequate classrooms**, special rooms and facilities are available in the school for the effective learning and teaching of all the subject groups or areas of learning and experience; and
 - the change of room use does **not involve any structural alterations** to the school premises, any alteration to the latrine accommodation or the sanitary arrangements of the school or in the ventilation or lighting of a room and/or subdivision of a room.

Chapter 6

Curriculum, Learning and Teaching, and Academic Planning

Autonomy and responsibility in curriculum and teaching

- Schools have been enjoying **flexibility** in terms of the medium of instruction, curriculum arrangements, choices for public examinations, etc. They may offer local and/or non-local curricula according to their mission.
- Schools are required to conduct systematic and strategic curriculum **planning** to ensure that all teaching and management personnel **collaborate** towards shared educational goals.

School-based planning

- Schools offering local curriculum and their teachers are required to observe
 - curriculum documents prepared by the **Curriculum Development Council (CDC)** and published for use in schools by EDB, and
 - guidelines issued by Curriculum Development Institute,in developing and making adaptations to their school-based curriculum.



School-based planning (2)

- **National security education**
- **National flag, national emblem, national anthem, regional flag and regional emblem education**
- **School assessment and assignment policies**
- **Selection and management of textbooks and learning and teaching resources**

Chapter 7

**Student Affairs, Students' Well-being and Safety
Management**

Responsibility of schools on student affairs

- SMC should ensure that schools provide a **safe, hygienic and healthy** learning environment, where all educational activities effectively promote the **all-round development** of the students, and that **safety measures** are taken in all school activities.

Management of admission, attendance and absence

- The admission must be in compliance with
 - Administrative directives issued by EDB from time to time
 - EDB Circular No. 16/2025 “Entry of Non-local Children and Children Holding a Form of Recognizance to Schools in Hong Kong” when admitting non-local students
 - Legislation on equal opportunities (such as the Disability Discrimination Ordinance and Race Discrimination Ordinance)
 - Personal Data (Privacy) Ordinance and/or Prevention of Bribery Ordinance where appropriate



Management of admission, attendance and absence (2)

- Keep proper and maintain timely **records of each student** including
 - Personal information
 - Other important information such as information of students' leaving (e.g. reasons), personal learning experiences, conduct and achievements
- Record the **attendance and absence of students** in detail in attendance registers. A separate attendance register for each class must be kept in a form approved by PS(Ed).

Management of admission, attendance and absence (3)

- EDB Circular No. 21/2024

“Upholding Students’ Right to Education”

- Report **non-attendance cases without delay to EDB on the 7th school day of the student’s continuous absence** disregard of their age, class level and reasons for absence.



Question and Answer 3

Q: Are private schools required to **report** cases of **continuous absence** for students in S4 – S6?

A: Yes. Prolonged absence makes school re-integration increasingly difficult and raises the risk of long-term social problems.

To uphold students' right to education, schools should adopt **an early intervention approach** to non-attendance / potential dropout cases, providing follow-up services and counselling as appropriate at the earliest opportunity.



Promotion, repetition and graduation

- SMCs are required to draw up policies on student promotion, repetition and graduation, and specify the requirements. The policies have to be endorsed by SMC and properly recorded.

Consider carefully the school-based arrangements, including whether to issue academic certificates to students who

- is absent for the entire year or for an extended period,
- fails to complete the examinations, and/ or
- does not meet the required standards in conduct or academic assessments.

Question and Answer 4

Q: Can private schools expel students?

A: In principle, schools should not expel students or suspend them from class or school. Refer to the requirements in [EDBC No. 21/2024 “Upholding Students’ Right to Education”](#) if necessary.

If fees remain unpaid for a prolonged period, school should first contact parents to check for sudden change in family circumstances and offer assistance.

While private schools are entitled to collect fees, the student’s right to education should be prioritised, schools may consult EDB on handling these cases.



Management on student safety, health and activities

- All school activities should be provided with sufficient student safety and health measures.
 - EDB's "[Checklist of Student Safety and Health Measures](#)"
- Outdoor activities
 - Guidelines on Outdoor Activities
(including obtaining [prior consent from the parents](#), notifying the police, and bringing along an emergency contact list)
- Study tours outside Hong Kong
 - Guidelines on Study Tours Outside Hong Kong



Procurement of insurance

- Acquire **adequate insurance** to cover
 - **Public liabilities** for damages arising from fire, accidents and injuries to students and other persons
 - **Employees' compensation** as required by the Employees' Compensation Ordinance

Private School List

Private School List

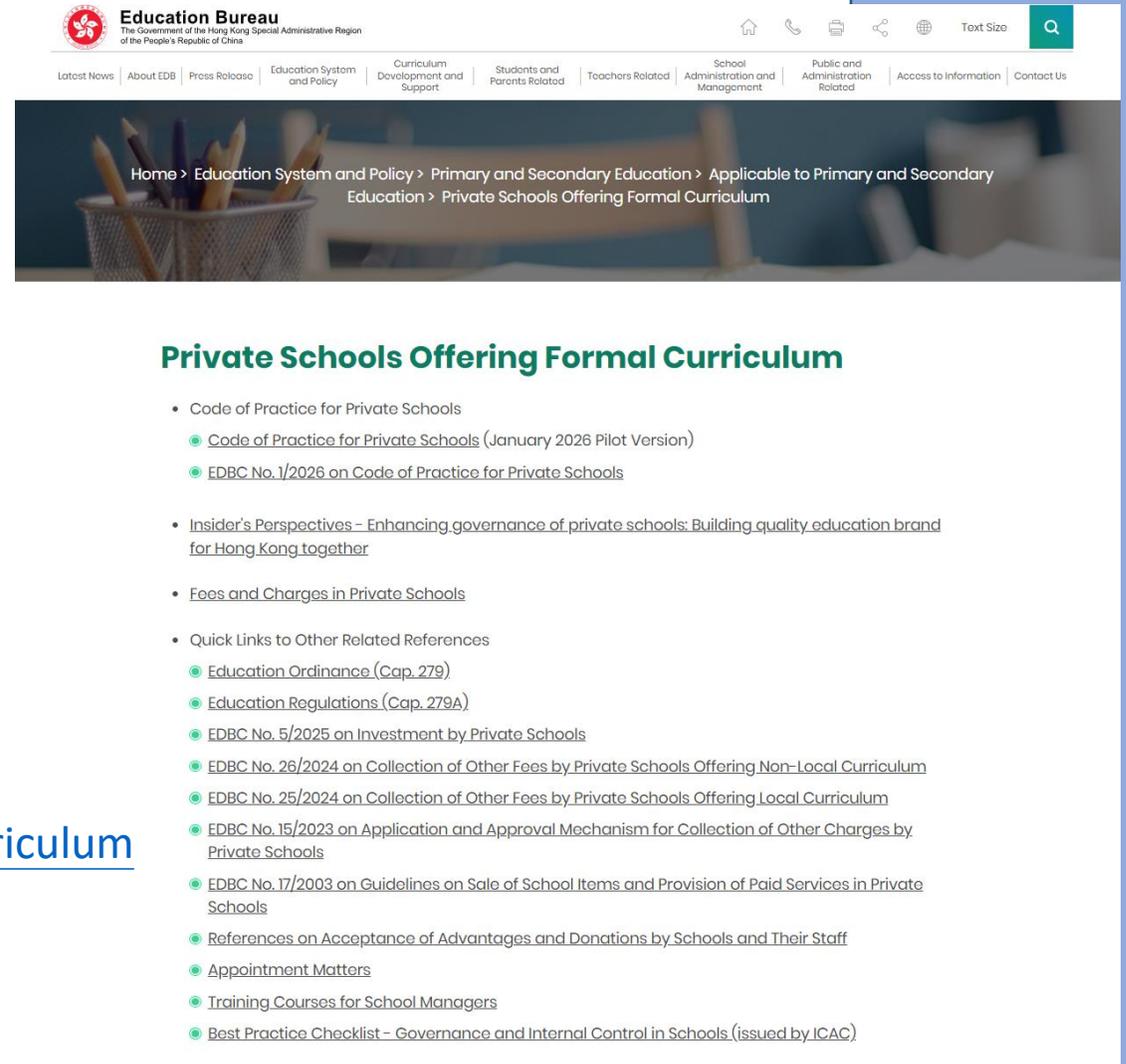
- To further enhance the reputation of the private school sector as a whole, the EDB is preparing for the publication of the **Private School List** (the List).
- A **voluntary listing system** is being devised.

Private School List (2)

- Intending private schools for inclusion in the List must
 - Meet certain standards in key areas
 - compliance,
 - school governance and
 - safeguard of key stakeholders' interests, etc.
 - Commit to continuous compliance with the Code.
- The EDB will later invite private schools to apply for inclusion in the List.

Designated Webpage on “Private Schools Offering Formal Curriculum”

<https://www.edb.gov.hk/en/private-sch-formal-curriculum>



The screenshot shows the Education Bureau website. The header includes the Education Bureau logo and name, along with navigation links for various categories like 'Latest News', 'About EDB', 'Press Release', etc. The main content area features a breadcrumb trail: Home > Education System and Policy > Primary and Secondary Education > Applicable to Primary and Secondary Education > Private Schools Offering Formal Curriculum. Below this, the title 'Private Schools Offering Formal Curriculum' is displayed. A list of links follows, including 'Code of Practice for Private Schools', 'Insider's Perspectives – Enhancing governance of private schools: Building quality education brand for Hong Kong together', 'Fees and Charges in Private Schools', and 'Quick Links to Other Related References'.

Education Bureau
The Government of the Hong Kong Special Administrative Region
of the People's Republic of China

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- [Insider's Perspectives – Enhancing governance of private schools: Building quality education brand for Hong Kong together](#)
- [Fees and Charges in Private Schools](#)
- Quick Links to Other Related References
 - [Education Ordinance \(Cap. 279\)](#)
 - [Education Regulations \(Cap. 279A\)](#)
 - [EDBC No. 5/2025 on Investment by Private Schools](#)
 - [EDBC No. 26/2024 on Collection of Other Fees by Private Schools Offering Non-Local Curriculum](#)
 - [EDBC No. 25/2024 on Collection of Other Fees by Private Schools Offering Local Curriculum](#)
 - [EDBC No. 15/2023 on Application and Approval Mechanism for Collection of Other Charges by Private Schools](#)
 - [EDBC No. 17/2003 on Guidelines on Sale of School Items and Provision of Paid Services in Private Schools](#)
 - [References on Acceptance of Advantages and Donations by Schools and Their Staff](#)
 - [Appointment Matters](#)
 - [Training Courses for School Managers](#)
 - [Best Practice Checklist – Governance and Internal Control in Schools \(issued by ICAC\)](#)

Thank you