



# Child Protection and Safeguarding Policy

## 2021-22

### Harrow Hong Kong Child Protection and Safeguarding Policy

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### Glossary

SWD	Social Welfare Department of the Hong Kong Government
SWO	Social Welfare Officer of the SWD
FCPSU	Family and Child Protection Services Unit of the SWD
CAIU	Child Abuse Investigation Unit of the Hong Kong Police
CPSIT	Child Protection Special Investigation Team of the Hong Kong Police
DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead
EYCPC	Early Years Child Protection Coordinator

## INTRODUCTION

Harrow Hong Kong is committed to safeguarding and promoting the welfare of all pupils at the School. Safeguarding, in addition to Child Protection, includes other issues such as pupil health and safety, anti-bullying/cyber-bullying, medical provision, and drugs and substance misuse. Policies and guidelines on these areas should be read in conjunction with this document and, in particular, the:

- Staff Child Protection and Safeguarding Code of Conduct
- Staff ICT Acceptable Use Policy
- Pupil ICT Code of Conduct
- Professional Guidelines for Teachers and Administrative Staff
- Anti-Bullying and Harassment Policy

This Child Protection and Safeguarding Policy applies to all members of staff, pupils, external contractors, volunteers and guests of the School, who must ensure that the policy is adhered to at all times. In all cases of actual or suspected abuse, the Designated Safeguarding Lead (DSL) must be informed and the School's procedures followed. The Designated Safeguarding Lead will inform the Head of all cases of actual or suspected abuse. The exceptions to this would be if a member of staff / volunteer were implicated in the concerns, in which case the Head must be informed. If the Head is implicated in the concerns, the Governor with responsibility for Child Protection must be informed. It is vital to stress that any concerns about child protection or safeguarding must be reported to the relevant person. In the UK Children Acts of 1989 and 2004, a child is defined as anyone who has not yet reached their 18<sup>th</sup> birthday, and this is the definition which the School adopts.

### Key Personnel

- **Designated Safeguarding Lead (DSL):**  
Mr **Tom Hicks** (Principal Deputy Head, Pastoral and Wellbeing) [thicks@harrowschool.hk](mailto:thicks@harrowschool.hk)  
Mobile: 98644491
- **Deputy DSLs (DDSLs):**  
Mr **Brendan Shanahan** (Head of the Lower School) [bshanahan@harrowschool.hk](mailto:bshanahan@harrowschool.hk)  
Mr **Simon Mildinhall** (Deputy Head, Pastoral and Wellbeing) [smildinhall@harrowschool.hk](mailto:smildinhall@harrowschool.hk)  
Ms **Kim Gratton** (Associate Assistant Head, Pastoral and Wellbeing)  
[kgratton@harrowschool.hk](mailto:kgratton@harrowschool.hk)  
Mrs **Rebecca Woods** (Head of Early Years) [rwoods@harrowschool.hk](mailto:rwoods@harrowschool.hk)  
Mrs **Lauren Berner** (Deputy Head, Lower School Pupil Wellbeing)  
[lberner@harrowschool.hk](mailto:lberner@harrowschool.hk)  
Ms **Joanne Kar** (Executive Assistant to the Head) [jkar@harrowschool.hk](mailto:jkar@harrowschool.hk)  
Ms **Priscilla Lau** (Upper School Office Manager and PA to Principal Deputy Heads)  
[kyplau@harrowschool.hk](mailto:kyplau@harrowschool.hk)
- **Governor with responsibility for Child Protection:**  
Mr **Eric Leung** [eleung@harrowis.com](mailto:eleung@harrowis.com)
- **Consultant School Psychologist:**  
Dr **Reena Gogna** [rgogna@harrowschool.hk](mailto:rgogna@harrowschool.hk)
- **Lead School Counsellor:**  
Mrs **Lauren Liu** [lliu@harrowschool.hk](mailto:lliu@harrowschool.hk)

This policy has been drawn up on the basis of law and guidance that seeks to protect children in Hong Kong and worldwide. Specifically:

- The UN Convention on the Rights of the Child (UNCRC), which was adopted by the United Nations (Resolution 44/25) in 1989. The Convention recognizes and protects the fundamental freedoms and inherent rights of children and was extended to Hong Kong in 1994.
- The Hong Kong Social Welfare Department's '[Procedural Guide for Handling Child Abuse Cases](#)' (Revised 2007, updated February 2014)
- The UK Children Act 1989 & 2004

Relevant Hong Kong ordinance includes:

- s.124 of the Crimes Ordinance (Cap.200), refers to the Age of Consent, stating that a man who has unlawful sexual intercourse with a girl under the age of 16 shall be liable to imprisonment for 5 years. Under s.123 of the Crimes Ordinance, a man who has unlawful sexual intercourse with a girl under the age of 13 shall be liable to imprisonment for life.
- Article 34 of the UNCRC requires that children should be protected from all forms of sexual exploitation and sexual abuse. As a consequence, Hong Kong enacted the Prevention of Child Pornography Ordinance (PCPO), Cap. 579, which came into operation in 2002. The PCPO prohibits child pornography, pornographic performances by children and child sex tourism. It strengthens the protection of children by criminalizing the printing, making, producing, reproducing, copying, importing, exporting, publishing, possessing and advertising of child pornography. Any person who has in his possession any child pornography (unless he is the only person pornographically depicted in the child pornography) commits an offence and is liable (a) on conviction on indictment to a fine of \$1,000,000 and to imprisonment for 5 years; or (b) on summary conviction to a fine of \$500,000 and to imprisonment for 2 years.

The UK Government's statutory definition of child sexual exploitation is:

- "Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.  
"The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology."

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## CHILD PROTECTION AND SAFEGUARDING POLICY

Harrow Hong Kong recognises its responsibilities for child protection and believes that the welfare of the child is paramount, as enshrined in the UK Children Act 1989. Whilst the School strives to minimise risk, it is fully aware that child protection risk cannot be eliminated.

This policy applies to all members of staff, pupils, external contractors, volunteers and guests of the School, who must ensure that the policy is adhered to at all times.

There are five main elements to the policy:

1. Establishing a positive, supportive, secure environment in which children can learn and develop, together with a School ethos that promotes, in all pupils, a sense of being valued.
2. Ensuring we practise safer recruitment in checking the suitability of all staff and volunteers who work at the School.
3. Raising awareness of child protection issues and equipping children with the skills needed to keep themselves safe through the content of the curriculum. Pupils will be taught about safeguarding and 'recognise when they are at risk and how to get help when they need it' ([Ofsted Inspecting Safeguarding Guidance](#), September 2019).
4. Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
5. Supporting pupils who have been abused in accordance with their agreed child protection plan.

The School recognises that because of the day-to-day contact with children, members of staff are well placed to observe the outward signs of abuse. Therefore, Harrow Hong Kong will:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- Ensure children know that there are adults in the School whom they can approach if they are worried.
- Include opportunities in the *Facing Challenges* programme for children to develop the skills they need to recognise and stay safe from abuse, including recognising and reporting peer-on-peer abuse, harmful sexual behaviour and online abuse.
- Follow the procedures set out by the Social Welfare Department, and additionally take account of all guidance issued in the UK by the NSPCC, DfE, National Minimum Standards and the Independent Schools' Inspectorate; and worldwide through the UN Convention on the Rights of the Child (UNCRC).
- Ensure there is a Designated Safeguarding Lead and Deputy Designated Safeguarding Leads who have received appropriate training and support for this role. Training in child protection is carried out every two years for the DSL and the DDSLs.
- Ensure there is a Nominated Governor responsible for Child Protection (Mr Eric Leung). The Governing Body undertakes an annual review of the child protection policy, and procedures and the efficiency with which the related duties have been discharged, including remediation of deficiencies or weakness.
- Ensure safer recruitment practices are always followed for all staff and volunteers who have a role in the School, including appropriate pre-appointment checks on teaching staff and volunteers, and when possible on contractors and other individuals.
- Ensure every member of staff (including temporary staff, supply staff and volunteers) and the governing body knows who the Designated Safeguarding Lead is, what their role is, how to contact them and who to go to in their absence.
- Ensure all staff and volunteers are aware of child protection arrangements, understand their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the Designated Safeguarding Lead.
- Through regular staff training we will foster a culture of mutual respect between pupils and members of staff, with adults modeling good practice in this context. Training in child protection is provided annually to all permanent staff. All part-time and voluntary staff are made aware of the arrangements for child protection. Senior pupils with positions of responsibility are briefed on appropriate actions.
- Notify the Social Welfare Department if there is an unexplained absence of more than two days of a pupil who is in receipt of a child protection plan.

- Develop effective links with relevant agencies in Hong Kong and co-operate as required with their enquiries regarding child protection matters.
- Keep written, dated and signed records of concerns about children, even where there is no need to refer the matter immediately.
- Ensure all child protection records are kept secure and separate from the main pupil file, in locked locations or secure electronic locations accessible only to specified senior staff.
- Follow the statutory guidance procedures and work closely with the authorities where an allegation is made against any member of staff, volunteer, or the Head; in the case of an allegation against the Head, the Governor with responsibility for Child Protection would be informed. Good practice requires clear records of investigations and outcomes of allegations are held on confidential staff files.
- Risk assess all activities organised by the School that take place off the School's site; this includes, wherever possible, ensuring that the off site providers have undertaken appropriate checks for their staff that will have contact with pupils from the School.
- Ensure that any deficiencies or weaknesses in child protection arrangements are remedied without delay.
- Reinforce the notion that all children regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse.
- Remember that some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs, disability or other individual needs (ie: contextual safeguarding).

The Children Act (1989) and Keeping Children Safe in Education (September 2021) 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. (Additionally, 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 - refer to [Personal Data \(Privacy\) Ordinance, Cap 486](#) for details.)

We recognise that children who suffer any form of abuse may find it difficult to develop a sense of self worth. They may feel helplessness, humiliation and some sense of blame. The School may be the only stable, secure and predictable element in the lives of children at risk. When at School their behaviour may be challenging or they may be withdrawn. In such cases, we will liaise with other agencies that support them. We will also ensure that, should a pupil in receipt of a child protection plan move schools, their information is securely transferred to the new school immediately and that the FCPSU (Family and Child Protective Services Unit) is informed.

Harrow Hong Kong's policy on Anti-Bullying and Harassment (including cyber-bullying) must be read in conjunction with the Child Protection and Safeguarding Policy. Any serious bullying concerns will be referred to the Designated Safeguarding Lead and appropriate action will be taken (see Procedure for dealing with cyber-bullying incidents – [Appendix 1](#))

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## **Role and Responsibilities of the Designated Safeguarding Lead (DSL)**

The School has a Designated Safeguarding Lead who is responsible for dealing with any concerns about the protection of children.

The role of the DSL (Mr Tom Hicks (Principal Deputy Head, Pastoral) is to:

1. Recognise how to identify signs of abuse and know when to contact the Social Welfare Department - the Family and Child Protective Services Unit (FCPSU) or the Child Abuse Investigation Unit (CAIU) - in the event of a child protection matter coming to his attention;
2. Ensure that appropriate information is available at the time of referral and that the referral is confirmed in writing under confidential cover;
3. Liaise with the SWD and other agencies, as appropriate;
4. Act as a source of advice and expertise and keep relevant people within the School informed about any action taken and any further action required;
5. Ensure that a proper record is kept of any referral and action taken, and that this is kept safely and in confidence;
6. Manage and deliver staff child protection training and review the operation of the Child Protection Policy annually (with the appropriate Nominated Governor) to ensure the procedures are working and that it complies with current best practice.

It is important that the DSL does not work in isolation and, therefore, they work closely with a team of appropriately trained senior staff from each part of the school.

### **Responsibilities of all Members of Staff**

There is an inescapable, personal and professional responsibility by all staff for the protection of children from harm.

Members of staff have a duty to report all suspicions of abuse to the Designated Safeguarding Lead, (or a DDSL in their absence), who will then inform the Head. The Head or the DSL will then inform the Governor with responsibility for child protection (Mr Eric Leung). If the allegation involves any of the persons named here, the member of staff should report to one of the other designated persons. If the allegation involves the DSL, the Head must be informed. If the Head is absent, it should be passed to the nominated Governor, who must also be informed if the allegation relates to the Head.

### **“Whistleblowing”/Confidential reporting (See [Appendix 3](#))**

If a member of staff or volunteer raises genuine concerns, they will not be at risk of any form of victimisation, or subsequent discrimination or disadvantage as a result. Further details can be found in the UK’s [Public Interest Disclosure Act 1988](#) and in [Appendix 3](#).

Professionals should protect the confidentiality of the personal data of their clients obtained in the course of their duties because privacy is protected both legally and ethically – Article 14 of the Hong Kong Bill of Rights, Personal Data (Privacy) Ordinance, the Common Law and the professional code of ethics. However, in exceptional cases, depending on the circumstances, disclosure may be justified when disclosure of information is necessary to prevent foreseeable harm to a child.

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## CHILD ABUSE

### Introduction

All members of the School staff should be alert to the possible signs of abuse of a pupil. Abuse may take several forms, which are not mutually exclusive:

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

**Emotional abuse** is harder to detect and may result from conveying to a child they are worthless, teasing or humiliation, the denial of love and affection, interests or friendships. It may include developmentally inappropriate expectations being imposed on children including interactions that are beyond a child's developmental capability or over protection and the limitation of opportunities to explore and learn.

Emotional abuse can include seeing or hearing the ill treatment of another person, bullying (including cyber-bullying) and the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may occur alone.

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, or non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). It is a common misconception that adult males are the sole perpetrators of sexual abuse; women can also commit acts of sexual abuse, as can other children. As per the UK Government 'Keeping Children Safe in Education' (2021), schools should take a zero-tolerance approach to sexual violence and sexual harassment. Any incidences of these will be pursued following the School's anti-bullying and behaviour policies.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, such as the provision of adequate food, clothing and shelter (including exclusion from home or abandonment), protection from physical and emotional harm or danger, adequate supervision (including the use of inadequate care-givers), and access to appropriate medical care or treatment.

There will be other circumstances, not amounting to abuse, which give cause for serious concern about the welfare of pupils. Questions of the young person being in moral danger, being uncared for, engaging in antisocial or inappropriate behaviour and so on may be referred to the Designated Safeguarding Lead, who will discuss the matter with the Head, and as necessary, with the Social Welfare Department. Such cases may also be referred to the School Health Care Centre. In each case the School's Designated Safeguarding Lead must be informed.

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## PROCEDURES

### a) Cases where abuse may have been inflicted by parents or carers

- i) Suspicion or knowledge of abuse must be reported to the Designated Safeguarding Lead or a Deputy who will share such information with the Head and possibly the relevant House Staff of the pupil concerned on a 'need to know' basis.
- ii) Any adult to whom abuse is reported by a pupil has a duty to listen to the pupil, to provide reassurance, and subsequently to record the pupil's statements. They must not press the pupil, ask probing questions or suggest answers. The situation should then be reported and discussed with the Designated Safeguarding Lead who will consult with the Head. The School's Child Protection Procedures must be referred to at all stages.
- iii) Expert medical diagnosis may be required quickly. The Designated Safeguarding Lead, their Deputies or the Head will arrange this following consultation with the Social Welfare Department.

### b) Cases where abuse may have been inflicted by staff or volunteers

Allegations management procedures, as laid out below (see also [Appendix 2](#)), should be followed if it is alleged that a member of staff or volunteer has:

- i) Behaved in a way that may have harmed a child;
- ii) Possibly committed a criminal offence against or related to a child; or
- iii) Behaved towards a child or children in a way that indicates they are unsuitable to work with children

If an allegation is made against a member of staff or volunteer it must be responded to; there is an obvious need to act immediately and with utmost discretion. The quick resolution of an allegation must be a clear priority to the benefit of all concerned. The informant must be told that the matter will be referred, in confidence, to the appropriate people. This must be done, and the written record passed on the same day to the Head. If the allegation involves the Head, details must be passed to the Governor with responsibility for Child Protection.

The circumstances should be kept **strictly confidential** until the Head or Governor with responsibility for Child Protection has been able to consult with the SWD to agree whether or not an allegation or concern indicates possible abuse. The School will not undertake an investigation without prior consultation with the SWD. All allegations must be referred to the SWD within 1 working day. The possible outcomes of consultation with the SWD are:

- i) No further action should be taken
- ii) The significant harm threshold has been reached and a strategy discussion should be held
- iii) The matter should be referred to the police/CAIU for a criminal investigation
- iv) The matter constitutes a possible professional conduct issue and the employer should carry out a disciplinary investigation.

The SWD will discuss with the School whether or not the member of staff can remain on the School site, pending further investigation. It is the employer's decision alone whether suspension/leave of absence is implemented although this should only be the case if there is no reasonable alternative. If the allegation relates to a member of House staff or other residential staff, accommodation away from the School is likely to be arranged. If the allegation is against a member of staff and the Police or CAIU decides to take the case further, it is reasonable to ask for some indication of their timescales. The SWD can also advise in terms of process. These decisions are likely to be taken by the School in conjunction with the School's legal advisers and Human Resources department.

- Procedures need to be applied with common sense and judgement
- Allegations found to be malicious will be removed from personnel records
- Records must be kept on staff files of all other allegations but any that are not substantiated, are unfounded or malicious will not be referred to in employer references.

It is always better for a school to anticipate possible risks, and to seek to prevent all reasonable risk of misunderstandings and false allegations. Proper policy and procedures are also likely to deter any individual seeking to use the School as a basis for inappropriate relationships with pupils; the "Harrow Hong Kong Child Protection & Safeguarding - Staff Code Of Conduct" and the "Professional Guidelines for Teachers and Administrative Staff" documents help staff to know what behaviours are generally considered to be inconsistent with their professional status. Infringements will then be subject to disciplinary procedures as required.

There is understandable concern amongst many teachers that careers may be irreparably damaged by flimsy or malicious allegations by children. This is actually extremely rare. Pupils that are found to have made a malicious allegation are likely to receive a School sanction, which could include suspension or permanent exclusion.

### **c) Cases where abuse may have been inflicted by a pupil (peer-on-peer abuse)**

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation under the School's Behaviour Policy. The School will take advice from the SWD on the investigation of such allegations, and will take any appropriate action to ensure the safety and welfare of all pupils involved, including any pupils that are accused of abuse. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School



will be informed as soon as possible and will ensure that an appropriate adult supports the pupil during the interview. A bullying incident will be treated as a child protection concern if there is any reasonable cause to suspect that a child is suffering or likely to suffer significant harm.

The School's social vision statement, 'a caring, respectful community in which everyone thrives', emphasizes the need for all pupils to treat each other respectfully and the idea of peer-on-peer abuse will be addressed in Facing Challenges sessions. Any incidents will be recorded in the appropriate register and patterns will be investigated through the Pastoral Support Committee.

#### **d) Complaint or Allegation?**

It is important to draw a distinction between complaints and allegations against staff. Allegations are about the way a member of staff has behaved towards a pupil, which may have caused them harm. Complaints are about the way staff have applied School policies.

Any concern that involves the possibility of physical, emotional or sexual abuse or neglect by a member of staff or volunteer will always be discussed with the Hong Kong Social Welfare Department and their advice taken. See section (b) for more details.

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### **ALLEGATIONS INVOLVING SEXUAL IMPROPRIETY**

If a member of staff is informed by a pupil of an event involving sexual impropriety of any kind, whether between pupils, or staff and pupils, the following steps should be taken:

- i) Listen sympathetically and afterwards note the content of what was disclosed in the 'Harrow Hong Kong Safeguarding Concern' form or on CPOMS ([see Appendix 11](#)).
- ii) Contact the Designated Safeguarding Lead immediately, who will discuss with the Head and, as appropriate, the SWD to determine if a referral is required.
- iii) Once they are notified and if it is agreed that the School alone should follow up the issue, the Designated Safeguarding Lead (or a Deputy or the Consultant School Psychologist) will interview the complainant and report as quickly as possible to the Head, who will oversee the disciplinary aspects of the enquiry.
- iv) If the SWD seeks further investigations, they will themselves open an enquiry. This would normally involve the Police, Designated Safeguarding Lead, School Psychologist and the Head. In these circumstances, the School's disciplinary enquiry will be suspended until cleared by the SWD.

This policy should be implemented regardless of whether the complainant is over or under 16 because of the potential for an abuse of trust and under the UK Education and Training (Welfare of Children) Act 2021. Parents should be informed as soon as possible that a referral to the SWD will be made by the Designated Safeguarding Lead, unless to do so would put the pupil at greater risk of harm. If there is any doubt, the Designated Safeguarding Lead will consult with the Police and the SWD beforehand.

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### **STAFF CODE OF CONDUCT**

Cordial relations between teaching staff and pupils are at the heart of a happy and thriving school. At the same time, in the interests of all parties, professional boundaries must be observed on all occasions; they are outlined in the 'Harrow Hong Kong Child Protection & Safeguarding - Staff Code Of Conduct' ([Appendix 12](#)) and the 'Professional Guidelines for Teachers and Administrative Staff' in the Staff Handbook.

Over-familiarity, however well intentioned, can lead to serious moral and legal complications. Since the implementation of the Children's Act in the UK, the number of complaints against members of the teaching profession has risen sharply. Members of staff must, therefore, all be aware of the possibility of accusations and try to avoid potentially hazardous situations. A teacher

should never speak to or touch a pupil in a manner that could be construed as having sexual overtones or that could be interpreted as a physical assault. Both the action and the intention may subsequently give rise to problems. One-to-one meetings between staff and a pupil (particularly those who may be more vulnerable) should be approached with caution. If in doubt it is advisable to have somebody else present, or let someone else know the meeting is taking place or inform a line manager, record the reason and circumstance of the meeting, leave the door open, sit behind a desk, use a classroom with glass walls etc.

Particular care should be taken when carrying out sports coaching or music tuition where it may be necessary to make physical contact with pupils to demonstrate correct positioning, or work on a one to one basis. If in doubt, contact the Designated Safeguarding Lead for guidance. The Heads of these Departments will give additional training and guidance to the staff in their Departments about appropriate and subject-specific behaviours and conduct.

Any electronic communication between staff and pupils should be approached with great caution and should adhere at all times to the School's Staff ICT Acceptable Use Policy. Good practice includes valuing and respecting children as individuals, and the adult modeling of appropriate conduct will always exclude bullying, shouting, racism or sexism. Staff should not send personal emails to pupils and any email to a pupil should be professional in its tone and content. Staff may contact alumni of the School through professional networks such as LinkedIn, though not through social media such as Facebook until the pupil has left university.

For further advice on good practice see: UK Government Guidance – "[Safer Working Practice for Adults who work with Children and Young People in Education Settings](#)".

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## PROCEDURES FOR REPORTING CONCERNS

Staff could have suspicions or concerns raised in a number of ways, the most likely of which are:

1. The conduct of a member of staff;
2. A child, parent or member of staff "disclosing" abuse;
3. Bruising or evidence of physical hurt; which may or may not be accompanied by;
4. Unusual behaviours by a child.

If a member of staff has such concerns they should be reported to the Designated Safeguarding Lead immediately and confirmed in writing within 24 hours, using the 'Harrow Hong Kong Safeguarding Concern' form or on CPOMS (see [Appendix 11](#)).

**Delay could prejudice the welfare of a child.** If the concerns relate to the conduct of a member of staff, these also should be reported directly to the Head; there is an obvious need to act immediately and with utmost discretion.

The Designated Safeguarding Lead / Head will consider the report and either refer this immediately (and certainly within 24 hours) to the relevant authorities or, after taking appropriate advice (which may include discussing the circumstances on a confidential basis with the Social Welfare Department or the Police) decide not to refer the concerns to the authorities but keep a full record of the concerns.

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## WHAT TO DO IF A CHILD DISCLOSES

The following information is intended to assist you if you become involved in a potential child protection situation when a child or young person makes a disclosure.

**Note that this is a completely different procedure to interviewing pupils on disciplinary issues.**

- Listen, and allow the pupil to finish without directly questioning or stopping them. Let them tell you what they want to and no more. They may need to disclose to a specialist later and too much detail now may interfere with later investigations.
- When the interview has finished, make sure the pupil feels secure and explain what you are going to do next.
- Write down notes, including date and time of the interview and sign the notes. Record as much as you can remember as soon as possible (preferably immediately) afterwards, using the pupil's own words, on the 'Harrow Hong Kong Safeguarding Concern' form or CPOMS ([see Appendix 11](#)).
- Stay calm and convey this through word and action; reassure the pupil that you are taking what they have to say seriously.
- Report to the Designated Safeguarding Lead and provide the written record of the incident (on the 'Harrow Hong Kong Safeguarding Concern' form or CPOMS) the same working day.

### Confidentiality

- The management of confidentiality is an essential factor in all issues relating to Child Protection.
- Staff should **never give pupils or adults an absolute guarantee of confidentiality**, but must ensure that the information is disclosed only to the people who need to know. Make sure that this is clear early on, not sprung on the pupil at the end.
- It should be explained to children and young people that secrets cannot and should not be kept if keeping them means that they, or others, may continue to be harmed.

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## AFTER DISCLOSURE

### ✓ Stay Calm

Try not to transmit your anger, shock, distress, or embarrassment to the child - either verbally or through body language.

### ✓ Act as though you believe in the Child

### ✓ Reassure the child

Not your fault; glad they told you etc.

### ✓ Allow the child to talk / finish the story

Don't question the child

### ✓ Report the incident immediately to the Designated Safeguarding Lead (DSL), or in their absence, a Deputy DSL (DDSL), or the Head, passing on the notes you have made.

Explain to the child that you may need to talk to someone in another agency whose job it is to help and protect children, and that they may want to talk to the child, but offer to stay with the child and support them in that eventuality.

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## THE PROCESS OF REFERRAL

If, following the procedures outlined in this document, the abuse of a child is suspected, the Designated Safeguarding Lead, or other nominated person, will contact the FCPSU. The process that they will follow can be found in [Appendix 10](#)

In cases where sexual abuse is suspected and the victim is a child under 17 years of age, or in serious physical abuse cases where the victim is a child under 14 years of age, the Child Abuse Investigation Unit (CAIU) of the Police is responsible for investigating the allegations. The DSL may contact the CAIU directly or via the FCPSU.

The CAIU charter includes:

- a) Intra-familial sexual abuse (including the extended family e.g. mother, father, aunt, uncle);
- b) Sexual abuse where the perpetrator is known to the child or is entrusted with the care of the victim (e.g. baby-sitter, school teacher, youth worker);
- c) Serious physical abuse case at the discretion of the respective Senior Superintendent of Crime Region; and
- d) Organised child abuse, which is defined as abuse that may involve a number of abusers, a number of abused children and juveniles, and often encompasses different forms of abuse. It will also involve to a greater or lesser extent an element of organisation such as paedophile or pornography rings.
- e) If the case involves issues within the CAIU Charter, the Child Protection Special Investigation Team (CPSIT), comprising the Police, as well as social workers or clinical psychologists from the SWD with special training, will provide consultation and/or conduct a joint investigation.

If a referral is made, the following information should be made available to the agency:

- a. The immediate cause for concern and any immediate danger
- b. The child's full name, date of birth, address, I.D. number and disability or special needs of the child
- c. The child's whereabouts
- d. Name and HKIC number of parents or carers and details of other members of the household e.g. siblings.
- e. Name of the family doctor
- f. Name of school
- g. Name, post and phone number of contact person
- h. Name of other witnesses and other agencies
- i. Any other relevant information you may have

It is important to remember that submitted documentation may form part of the evidence should a case develop into court proceedings.

### Contact Details:

Social Work Officer of the FCPSU in Tuen Mun: **2618 5710 / 9460 4046**

SWD Departmental Hotline **2343 2255**

Police Duty Controllers in the New Territories **3472 7200**, OC CAIU **3661 3373/3661 3370**

District Police Stations – Tuen Mun **2463 1301** / Castle Peak **2441 3933**

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## SAFER RECRUITMENT

Before commencing employment at the School, all staff will have appropriate checks made about them to ensure that there are no reasons why they should not be working with children. These recruitment checks will be based upon guidelines in the UK from the September 2021 '[Keeping Children Safe in Education](#)' guidance and the UK Home Office's '[Application Processes For Foreign National Criminality Information](#)' (A-F, G-P & Q-Z). Additionally, the Hong Kong [Education Bureau Circular Memorandum No. 65/2010](#) (Measures for Strengthening the Protection of Pupils: Appointment Matters of Schools) and [Education Bureau Circular Memorandum No. 180/2011](#) (Adoption of Sexual Conviction Record Check Scheme in Private Schools Offering Non-formal Curriculum) have been observed. The results of all checks must be submitted to the HR department for checking before the commencement of employment (or as soon as possible afterwards, if logistical issues make this impossible).

Full details of the School's recruitment procedures can be found in the [Recruitment and Selection Policy](#)

Volunteers and Parent Helpers: do not need to undergo a specific recruitment check, but they should not be left alone unsupervised with children and should never be used for regulated activities e.g. toileting, changing, etc.

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## **Appendix 1: Safeguarding and ICT (Cyber-Bullying)**

Protecting young people in the online world means thinking beyond the School environment. As well as the computer to access the Internet, most mobile phones and games consoles offer broadband connections. Pupils may be working online in School, at home, in an Internet café or using free Wi-Fi access points. Increasingly pupils will have access to personal devices not covered by network protection and, therefore, the emphasis needs to be on educating all users (and their carers) as to the risks involved and their obligation to act responsibly while online.

Safeguarding pupils in both the real and virtual world is everyone's responsibility; all pupils and staff should be made aware of the School's Pupil ICT Code of Conduct and what to do if they have any ICT safeguarding concerns. Harassment, grooming of another person using technology, and breaching their right to privacy pose a serious threat to physical and emotional safety, and may have legal consequences. Encouraging or coercing a young person to produce or send nude or semi-nude images may amount to abuse or peer-on-peer abuse.

### **Procedures for dealing with Inappropriate / Illegal Internet Access or Material**

If a member of staff and/or a pupil encounters unsuitable material on the Internet (comments, images, videos, games, websites, etc.), this should be immediately reported to the Designated Safeguarding Lead who, in liaison with the Director of ICT, will consider a referral to the House Masters and House Mistresses, Principal Deputy Heads and eventually the Police. Illegal material within the School's network is a very serious situation, and must always be reported to the Director of ICT and the Principal Deputy Head, (Pastoral and Wellbeing). The School ensures processes are in place to minimise the risk of pupils gaining access to inappropriate materials, through content filtering, supervision and monitoring. Any incident that involves inappropriate adult access to legal material on the School's premises will be dealt with by the School's disciplinary policy.

### **What to do in the event of discovery of illegal material**

- Seek immediate and specific advice from the Designated Safeguarding Lead who will consult with the Director of ICT, the Head and the Police.
- Prevent any further access to the material until the correct advice is gained.

### **Procedure**

Information is crucial to dealing with the problem. Those who feel that they are being bullied, or who are witnesses to what they believe is bullying/cyber-bullying, should always tell a member of staff. The School endeavours to follow the No Bully system for all bullying incidents, however, in the case of illegal material being accessed on the internet or cyber-bullying cases, the following procedure may be used in its place.

1. Information about bullying comes from a variety of sources, including parents, pupils, staff and members of the public. In all cases, the School assures the person making the allegation that immediate action will be taken to stop the bullying/cyber-bullying and will pursue information so as to identify the bully. Parents are informed as soon as possible, though some delay may be necessary for investigations to be completed.
2. Depending on the nature of the allegation, the case will be dealt with either by the Tutor, House Master or House Mistress, Head of the Lower School, the Assistant/Deputy Heads, Designated Safeguarding Lead or a combination of these people. In all instances the Designated Safeguarding Lead will be informed. As a rough guide, the more serious the allegation, the more likely it is to involve senior staff and/or the Police.
3. Interviews will be conducted fairly, giving all sides the opportunity to state their case, so as to establish the truth in what seldom turn out to be straightforward issues. In all cases, pupils will be warned not to do or say anything that may prejudice their position vis-à-vis the pupil who has been bullied. (No revenge/stirring up support among friends, no taking the law into their own hands.)



4. Except for the most straightforward cases, in which truth has been established and the matter has been resolved swiftly, an interview will be conducted. A record will be kept of the interview, and notes, both rough copies and, where necessary, a brief summary and copies of any letters sent to parents will be retained on file to enable patterns to be identified.
5. Letters written to parents will detail the nature of the offence and any sanctions imposed, and will set out what improvements the School expects to be made in behaviour as well as the consequences of failure to improve. Recommendations may be made about a referral to the School Psychologist for everyone involved.
6. At the conclusion of the investigation, if appropriate, one of the members of staff involved will contact parents of all pupils directly involved and inform them of the action taken. Wherever possible, the identity of “informers” and pupils other than the son or daughter of the parent will not be disclosed.
7. The details of the incident will be kept in the School’s ‘Record of bullying-type behaviour’.

## **Sanctions**

In practice, the sanctions applied range from a verbal warning or a ban on use of the School’s computer network and/or Internet access to temporary or permanent exclusion, depending on the gravity of the offence and the pupil’s previous record with reference to bullying / cyber-bullying. In the most severe cases, it can result in criminal prosecution.

The aim of any sanction is to:

- Help the person harmed to feel safe again and be assured that the bullying will stop.
- Hold the perpetrator to account getting them to critically reflect and recognise the harm caused, so as to deter them from repeating the behaviour.
- Demonstrate to the School community that cyber-bullying is unacceptable and that the School has effective ways of dealing with it, so deterring others from behaving similarly.

When cyber-bullying is investigated, reference will be made to the Pupil ICT Code of Conduct; sanctions for breaches are set out in that document and the ‘Procedure’ section listed earlier in this document. Technology-specific sanctions for pupils engaged in cyber-bullying behaviour could include limiting Internet access for a period of time or removing the right to bring any electronic device into the School (although issues of child safety will be considered in relation to the latter).

Cyber-bullying will have an impact on the education and wellbeing of the person being bullied, and the physical location of the bully at the time of their action is irrelevant in this. Schools now have broad powers to discipline and regulate the behaviour of pupils, even when they are off the School site. Misconduct of any kind outside School will be subject to School discipline if the welfare of another pupil or the culture or reputation of the School is placed at risk.

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## Appendix 2: Allegations Management

Allegations management procedures should be followed when it is alleged that a staff member or volunteer has:

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

All staff in the School should report such an allegation immediately to the Head. The only exceptions to this is if the allegation concerns the Head, in which case it should be reported to the Governor with responsibility for Child Protection.

On being advised of an allegation which meets the criteria, the DSL, Head or Governor with responsibility for Child Protection should contact the Social Welfare Department within one working day. The SWD states 'The purpose of the initial enquiry is to gather and analyse information ... decide whether there is reason to believe that the child has been or is being abused ... determining whether there is a risk or likelihood of maltreatment in the future. The results of the social enquiry / investigation will form a base of the welfare plan for the child (2007).'

In Tuen Mun, the Social Work Officers of the Family and Child Protective Services Unit can be contacted on: 2618 5710 or 9460 4046.

### Useful Publications:

All allegations against staff will be dealt with using guidance found in the following documents: the Social Welfare Department's '[Procedural Guide for Handling Child Abuse Cases](#)' (Revised 2007, updated February 2014), the '[Working Together To Safeguard Children 2018](#)' and statutory guidance issued by the UK Government in September 2021 '[Keeping Children Safe in Education](#)'. Allegations against former staff members or volunteers will be referred to the appropriate authorities. If any information comes to light of allegations prior to employment with the School, these will be investigated fully and passed on to the relevant authorities.

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## **Appendix 3: Confidential Reporting/Whistleblowing**

### **Introduction**

The School has adopted this policy on “whistleblowing” to enable members of staff to raise concerns internally and in a confidential fashion about child protection, fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations or unethical conduct. The policy also provides if necessary, for such concerns to be raised outside the School’s internal organisation.

This policy on “whistleblowing” demonstrates that the School:

- a. Will not tolerate malpractice;
- b. Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- c. Will provide the opportunity to raise concerns outside the normal line management structure where this is appropriate;
- d. Will invoke the School’s disciplinary policy and procedure (see Staff Handbook) in the case of false, malicious, vexatious or frivolous allegations; and,
- e. Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

### **Procedure**

This whistleblowing policy is separate from the School’s procedures regarding grievances (see Staff Handbook). Employees should not use the “whistleblowing” procedure to raise grievances about their personal employment situation. Rather, this procedure is to enable members of staff to express a legitimate concern regarding the behaviour of another staff member within the School including any concerns, no matter how remote or apparently unsubstantiated. These may be related to child protection issues, fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the professional guidelines for staff, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

### **Confidentiality**

Employees who wish to raise a concern under this procedure are entitled to have the matter treated confidentially, and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity, the Police will in all cases be informed by the person to whom it is reported (the Principal Deputy Heads, the Director of Operations or the Designated Safeguarding Lead if safeguarding issues are involved)

### **The Investigation**

Any member of the teaching staff is at liberty to express their concern to the Head; any member of the administrative staff should report their concern to the Director of Operations of the Head. Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the resolution. A member of staff who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence in the first instance with the Governor with responsibility for Child Protection and Safeguarding, and subsequently the Chairman of Governors.

## **External Procedures**

Where all internal procedures have been exhausted, members of staff have a right of access to the Governors. It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the employee reasonably believes that:

- a) Exceptionally serious circumstances justify it;
- b) The School would conceal or destroy the relevant evidence;
- c) They believe they would be victimised by the School; or,
- d) A Government official has ordered it.

## **Malicious Accusations**

False, malicious, vexatious or frivolous accusations will be dealt with under the School's Disciplinary Procedure.

## **Protection from Reprisal or Victimisation**

No member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and follow the "whistleblower" procedures.

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## Appendix 4: WHO TO TALK TO?

### Worries And Complaints – A Pupil’s Guide

**The School’s Social Vision: “A caring, respectful community in which everyone thrives”**

It is very normal to have worries and concerns about life at School or at home, such as:

- Feeling unable to cope with your work or other activities.
- Struggling with friendships or relationships with other pupils.
- Concerns that others (a pupil, a member of staff or somebody outside the School) are being unkind, disrespectful or abusive.
- Concerns of being treated differently from others because of race or religion or some other reason.

A person’s life may be made unhappy through the deliberate actions of others, but also through careless actions. Bullying type behaviour is any act that is perceived to insult, humiliate, intimidate or hurt another person intentionally or repeatedly; such behaviour will not be tolerated at Harrow Hong Kong.

If any of these issues make a pupil worried or unhappy, or if any pupil is aware that someone else in the School community is feeling unhappy, talking to someone who can be trusted is essential. Pupils who keep things to themselves only end up feeling more unhappy and the initial problem grows. No pupil should ever feel that nobody cares.

There are many possible people that could help:

- Parents or guardian
- Another member of the family
- A shepherd, mentor or buddy
- A close friend
- A House Master or House Mistress
- Any member of the House Pastoral Team
- Any teacher
- A School or House Prefect
- A Pupil Wellbeing Ambassador
- The School Matrons
- A member of staff in the School Health Care Centre (2299 6215)
- The Deputy Head (Pupil Wellbeing), one of Principal Deputy Heads or the Head

There are also some external agencies that can be contacted in Hong Kong:

- Social Welfare Department (2343 2255)
- The Samaritan Befrienders - 24 hour emotional support (2389 2222)

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## Appendix 5: Creation and Use Of Digital and Other Images

If a member of staff has any concerns about the potential misuse of digital images they must report their concerns to the Designated Safeguarding Lead.

- Parents give consent for the School to use photographs of their children for legitimate purposes such as publicising the School or pupils' achievements, or marking special occasions. However, there are a small number of parents who object to their child's photograph being used and the updated list (found on the Staff Handbook) should be checked before any pupil's photograph is published externally.
- However, members of staff and pupils need to be aware of the risks associated with the use of such images and, in particular, with posting digital images on the Internet. Images may remain available on the Internet forever and could cause harm or embarrassment to individuals in the short or longer term. There are many reported incidents of employers carrying out Internet searches for information about potential and existing employees. The School will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm.
- Pupils are informed of the risks associated with taking digital images through the *Facing Challenges* programme. In addition, when using digital images, members of staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of these images. In particular they should recognise the risks attached to publishing their own images on the Internet such as on social networking sites. The production or sharing of nude or semi-nude images of children may amount to child abuse and should always be reported to the DSL.
- Images should be taken and stored on School equipment, though it is understood that many staff members do use Twitter and other social media platforms for marketing reasons. In these circumstances, the personal equipment of staff may be used but the images should be deleted once posted and the equipment must be made available to the Designated Safeguarding Lead for inspection on request.
- Photographs published on the School website, or elsewhere, that include pupils will be selected carefully and will comply with good practice on the use of such images. Individual close up pictures of a pupil often provide little context. An image of a group of children will often show an activity or situation to better effect. Close up pictures of an individual child with no surrounding context or purpose should, therefore, be avoided. Images of pupils must only be taken when they are suitably dressed; and must never be taken of pupils in sensitive areas, such as bathrooms. Particular care should be taken over images of pupils participating in sports activities.
- It is the responsibility of the person taking the digital image of a pupil to ensure that it is stored securely and in line with the School's Data Protection Policy. If a member of staff creates a digital image of a pupil at the School, it must not be kept for longer than is necessary. It must be permanently deleted or copied to the School's secure servers as soon as possible.
- Care should be taken when creating digital/video images that pupils are not participating in activities that might bring the individuals or the School into disrepute.
- A pupil's right not to be photographed must be respected.
- Care should be taken when using a pupils' full name in association with a photograph. Pupils' full names should not be used anywhere on a website, including social media, unless it has been agreed by the Designated Safeguarding Lead.

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## Appendix 6: Definitions and Potential Indicators Of Abuse

Source: Chapter 2 of '[Procedural Guide For Handling Child Abuse Cases](#)' by the Social Welfare Department of Hong Kong.

### Understanding of Child Abuse

2.1 In a broad sense, child abuse is defined as any act of commission or omission that endangers or impairs the physical / psychological health and development of an individual under the age of 18. Such an act is judged on the basis of a combination of community standards and professional expertise. It is committed by individuals, singly or collectively, who by their characteristics (e.g. age, status, knowledge, organisational form) are in a position of differential power that renders a child vulnerable. Child abuse is not limited to a child-parent / guardian situation, but includes anyone who is entrusted with the care and control of a child, such as child-minders, relatives, teacher, etc. For child sexual abuse, acts may also be committed by strangers to the child. Abuse can also be perpetrated by other young people (ie: peer-on-peer abuse)

2.2 The definition of child abuse set out in this Procedural Guide is provided to facilitate relevant professionals or personnel to safeguard the welfare of children being abused or at risk of abuse. It is not a legal definition. When prosecution against an abuser is required, reference should be made to the relevant Ordinances in force. It should also be noted that cases involving child welfare, but not defined as child abuse in this Procedural Guide, should also be handled with care and appropriate services should be rendered to ensure the best interest of children.

2.3 In determining whether a case should be defined as a child abuse case, the responsible professionals should make their assessment based on individual case merits and take into consideration various factors (such as the child's age, the act, the consequences of the act on the child, etc.) instead of just focusing on the frequency and nature of incident that has occurred.

### 2.4 Child Abuse includes the following:

- **Physical Abuse** is a physical injury or physical suffering to a child (including non-accidental use of force, deliberate poisoning, suffocation, burning, Munchausen's Syndrome by Proxy etc.), where there is a definite knowledge, or a reasonable suspicion that the injury has been inflicted non-accidentally;
- **Sexual Abuse** is the involvement of a child in sexual activity (e.g. rape, oral sex) which is unlawful, or to which a child is unable to give informed consent. This includes direct or indirect sexual exploitation and abuse of a child (e.g. production of pornographic material). It may be committed by individuals whether inside the home or outside. It may be committed by parents, or carers or other adults singly or acting in an organised way, or children. It includes acts which may be rewarded or apparently attractive to the child. It may be committed by individuals either known or strangers to the child; (Child sexual abuse differentiates from casual sexual relationship that does not include any sexual exploitation e.g. between a boy and a girl, though the boy can be liable for offences like indecent assault or unlawful sexual intercourse with an under-aged girl.)
- **Neglect** is severe or a repeated pattern of lacking of attention to a child's basic needs that endangers or impairs the child's health or development. Neglect may be:  
*Physical* (e.g. failure to provide necessary food, clothing or shelter, failure to prevent physical injury or suffering, lack of appropriate supervision or left unattended).  
*Medical* (e.g. failure to provide necessary medical or mental health treatment).  
*Educational* (e.g. failure to provide education or ignoring educational needs arising from a child's disability).  
*Emotional* (e.g. ignoring a child's emotional needs, failure to provide psychological care).
- **Psychological Abuse** is the repeated pattern of behaviour and attitudes towards a child or extreme incident that endangers or impairs the child's emotional or intellectual development. Examples include acts of spurning, terrorising, isolating, exploiting or

corrupting, denying emotional responsiveness, conveying to a child that he/she is worthless, flawed, unwanted or unloved (refer to Major Types of Psychological Abuse at Annex 1 to Chapter 2 of the full document by the Social Welfare Department - in the link above - for details). Such acts damage immediately or ultimately the behavioural, cognitive, affective, or physical functioning of the child.

## **Indicators Of Possible Child Abuse**

2.5 In conducting an investigation into any suspected child abuse case, the responsible professionals should make reference to indicators manifested by the child, the parents and the family. Physical indicators are indicators that are usually readily observable and may be mild or severe. The child's behaviour can sometimes be a clue to the presence of child abuse. Behavioural indicators may exist alone, or in combination with physical indicators. They may be subtle or they may be graphic statements by the child. The behaviour and attitudes of the parents, their own life histories, or even the conditions of their home, can also offer valuable clues to the presence of child abuse.

2.6 The list of indicators presented in this Chapter is not intended to be exhaustive. Neither does the presence of a single or even several indicators necessarily prove that child abuse exists. However, the possibility of child abuse should be seriously considered in case of repeated occurrence of an indicator, presence of several indicators in combination, or presence of serious injury. The behavioural indicators in different categories of child abuse might be interchangeable and should be applied as appropriate.

2.7 These indicators are only useful for professionals with training and experience in dealing with children and families. They are an aid to assessment by professionals and should be used with caution. Some sections will have more relevance to certain professions than others. (It is not expected, for example, that non-medical professionals should be conversant with or attempt to interpret the different forms of fracture or internal injury specified in this Chapter).

## **Checklist for Identifying Possible Child Abuse**

2.8 The following checklist aims to help concerned professionals and parties for identifying possible child abuse and is listed for reference only. It is not exhaustive and due consideration should be taken according to the age appropriateness of the child and his/her ability.

### ***Physical Abuse***

2.9 If there is doubt about the nature or severity of the physical signs of injury, the child concerned should be brought to medical attention as soon as possible.

#### **(a) Bruises and Welts**

- Should be interpreted with reference to the developmental age (e.g. whether the child is able to walk), number, size and distribution of the bruises, and whether they form a specific pattern that suggests direct impact with an object, punching, grasping, and/or bites.
- Bruises that are unlikely to be accidental, e.g. large bruises, bruises at unusual locations, multiple bruises of different ages, or injuries around the genitalia are suspicious.
- Bite marks are specific signs of injuries. If identified early, the injury itself may contain sufficient information to help identify the perpetrator.

#### **(b) Lacerations and Abrasions**

- Lacerations over the hands, arms or feet that damage the underlying tendons may be potentially crippling.
- Laceration to the fraenum, the piece of tissue that connects the upper lip to the upper gum in the middle, may be indicative of forced feeding.

#### **(c) Burns and Scalds**

- Burns / scalds from unintentional and intentional origin may be difficult to differentiate.
- Some inflicted burns may assume the shape or pattern of the burning objects, e.g. heated plate, cigarette.
- "Glove and/or stocking" distribution is indicative of dunking (immersion) scald of a limb or buttock.

(d) Fractures

- These should be interpreted / handled individually.

(e) Internal Injuries

- Brain / head injuries

May be due to direct impact, shaking or penetrating injuries.

The “Shaken Baby Syndrome” is the most common cause of death in physical child abuse.

- Abdominal injuries

Perforation of internal organs may lead to abdominal pain and vomiting.

Serious injuries or even death may occur without any external signs of injuries. Hence, a high degree of suspicion is required if abdominal injury is not to be missed.

(f) Others

- Fabricated or induced illnesses, including Munchausen’s Syndrome by Proxy
- Poisoning
- Hair loss by pulling or burning
- Drowning
- Cot death

Conclusion should not be made until a formal Coroner’s examination has been completed.

**Sexual Abuse (Both sexes)**

(a) Physical Indicators

- Torn, stained or bloody underclothing
- Complaints of pain, swelling or itching in the genital area
- Complaints of pain on urination
- Bruises, bleeding, or lacerations in external genitalia, vaginal or anal area, mouth or throat
- Vaginal / penile discharge
- Sexually transmitted disease
- Early adolescent pregnancy

(b) Behavioural Indicators

- Appetite disturbance
- Sexual exploitation of young children
- Poor peer relationship
- Unwilling to participate in physical activities
- Behaviour disturbance (anorexia nervosa, obesity, self-mutilation, run away, suicide, promiscuity, drug abuse)
- Sexual knowledge/behaviour that is abnormally advanced for the respective age of the child
- Marked change in academic performance
- Sleep disturbance
- Excessive masturbation
- Excessive reaction to being touched
- Intensive dislike for being left somewhere or with someone

**Neglect**

(a) Physical Indicators

- Malnutrition, under-weight, or lacking sufficient quantity and/or quality of food
- Delayed development
- Severe rash or skin disorder
- Left in care of inappropriate carer (e.g. young child)
- Inadequately supervised for long periods or when engaged in dangerous activities
- Unattended physical problems or unmet medical / dental needs
- Chronically dirty / unkempt
- Habitual absence from school or deprivation of schooling
- Spoiled food found at home
- Insanitary living conditions (garbage, excretion, dirt, etc)
- Young child unattended for long periods
- Abandoned: totally or for long periods of time
- Child confined at home

(b) Behavioural Indicators

- Persistent complaints of hunger or rummaging for food, overtly aggressive eating habit or begs for / steals food
- Assumes responsibilities inappropriate to age
- Addiction
- Delinquency
- Complaints of inadequate care, supervision or nurturing
- Being made to work excessive hours / beyond physical ability
- Poor peer relationship
- Responds to questions in monosyllables
- Extreme apprehension
- Sexual activity caused by inadequate supervision
- Reluctant to return home
- Runs away from home

**Psychological Abuse**

(a) Physical Indicators

- Failure to thrive
- Developmental delay e.g. speech disorder
- Anorexia nervosa

(b) Behavioural Indicators

*Indicators in the Child*

- Alienation
- Habit disorder
- Wetting / soiling
- Learning disorder e.g. marked deterioration in academic performance
- Lags in mental, emotional, social development
- Self harm or suicidal thoughts / attempts
- Disruptive behaviour or conduct problems
- Sleep disturbance
- Appetite disturbance
- Speech impediment

*Indicators in the Family*

- Rejection
- Constant scolding
- Humiliating criticism
- Inducing fear
- Encouraging deviant behaviour
- Bizarre punishment

**Characteristics Commonly Associated With Child Abuse**

2.10 Child abuse may occur in any family and the background of families with problem of child abuse may be different. The following characteristics, which are often found in child abuse cases, are listed for reference only and should not be taken as evidence of child abuse. On the other hand, child abuse may occur in families without any of the following identifiable features.

**The Family**

- a) Chaotic or obsessively organised home
- b) Social isolation
- c) Crisis or tension in family such as pregnancy, eviction, divorce / desertion / separation, in-law conflict
- d) Cultural / superstitious beliefs
- e) Domestic violence such as spouse battering

## **The Parents**

### *Biography*

- a) History of childhood abuse
- b) History of unhappy or being rejected in childhood; serious physical / emotional deprivation
- c) History / Experience of domestic or other violence
- d) History of serious recurrent illness and/or psychiatric disorder
- e) Alcoholism / Drug abuse / Gambling

### *Attitude and Behaviour*

- a) Rigid or unreasonable expectations of the child
- b) Strong belief in harsh discipline / corporal punishment
- c) Overtly critical of or aloof to the child
- d) Immaturity of parents
- e) Low self-esteem
- f) Passiveness
- g) Low intelligence of one or both parents
- h) Low tolerance to stress
- i) Deficiency in anger control
- j) Diffusion and confusion in family roles
- k) Sexual problems
- l) Unconvincing or inconsistent explanations of the child's injury
- m) Failure or delay in seeking medical advice
- n) Inadequate parenting

## **The Child**

- a) Premature birth
- b) Unwanted child
- c) Illegitimate child
- d) Baby with feeding or sleeping problem
- e) Non-thriving baby
- f) Early separation from parents
- g) Complicated birth delivery
- h) Child exposed to conflicting child care rearing practices e.g. child reared away from home
- i) Child with physical or mental disability
- j) Child associated with family misfortune
- k) The female gender

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## Appendix 7: Child Protection: Disclosures and Reporting Flowchart

### You have a concern about the safety / welfare of a child

Be Alert to signs of abuse and question unusual behaviours or marks/injuries.

Or

### A Young person discloses

Listen & Believe - take the allegation seriously. Support them for being brave. Tell them what you will do next. Never promise confidentiality.

You must

### Report it

Complete the Harrow Hong Kong Safeguarding Concern Form, to make a written record. Give the completed form to the designated Child Protection Officer as soon as possible.

### Who are the Child Protection Officers?

- **Designated Safeguarding Lead (DSL):**  
Mr **Tom Hicks** (Principal Deputy Head, Pastoral and Wellbeing) [thicks@harrowschool.hk](mailto:thicks@harrowschool.hk)  
Mobile: 98644491
- **Deputy DSLs (DDSLs):**  
Mr **Brendan Shanahan** (Head of the Lower School) [bshanahan@harrowschool.hk](mailto:bshanahan@harrowschool.hk)  
Mr **Simon Mildinhall** (Deputy Head, Pastoral and Wellbeing) [smildinhall@harrowschool.hk](mailto:smildinhall@harrowschool.hk)  
Ms **Kim Gratton** (Associate Assistant Head, Pastoral and Wellbeing)  
[kgratton@harrowschool.hk](mailto:kgratton@harrowschool.hk)  
Mrs **Rebecca Woods** (Head of Early Years) [rwoods@harrowschool.hk](mailto:rwoods@harrowschool.hk)  
Mrs **Lauren Berner** (Deputy Head, Lower School Pupil Wellbeing) [lberner@harrowschool.hk](mailto:lberner@harrowschool.hk)  
Ms **Joanne Kar** (Executive Assistant to the Head) [jkar@harrowschool.hk](mailto:jkar@harrowschool.hk)  
Ms **Priscilla Lau** (Upper School Office Manager and PA to Principal Deputy Heads)  
[kyplau@harrowschool.hk](mailto:kyplau@harrowschool.hk)
- **Governor with responsibility for Child Protection:**  
Mr **Eric Leung** [eleung@harrowis.com](mailto:eleung@harrowis.com)
- **Consultant School Psychologist:**  
Dr **Reena Gogna** [rgogna@harrowschool.hk](mailto:rgogna@harrowschool.hk)
- **Lead School Counsellor:**
- Mrs **Lauren Liu** [lliu@harrowschool.hk](mailto:lliu@harrowschool.hk)



## Appendix 8: Child Protection: Allegations Against Staff/Volunteers Flowchart

### If you become aware that a member of staff/volunteer may have

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved in a way that indicates they pose a risk of harm to a child

Or

### A Young person discloses abuse or neglect by a member of staff/volunteer

- Listen & Believe - take the allegation seriously.
- Support them for being brave.
- Never promise confidentiality.

You must

### Report it to the Head immediately

- Any concern or allegation against a member of staff / volunteer must be reported directly to the Head.
- Any concern or allegation against the Head must be reported directly to the Governor with responsibility for Child Protection

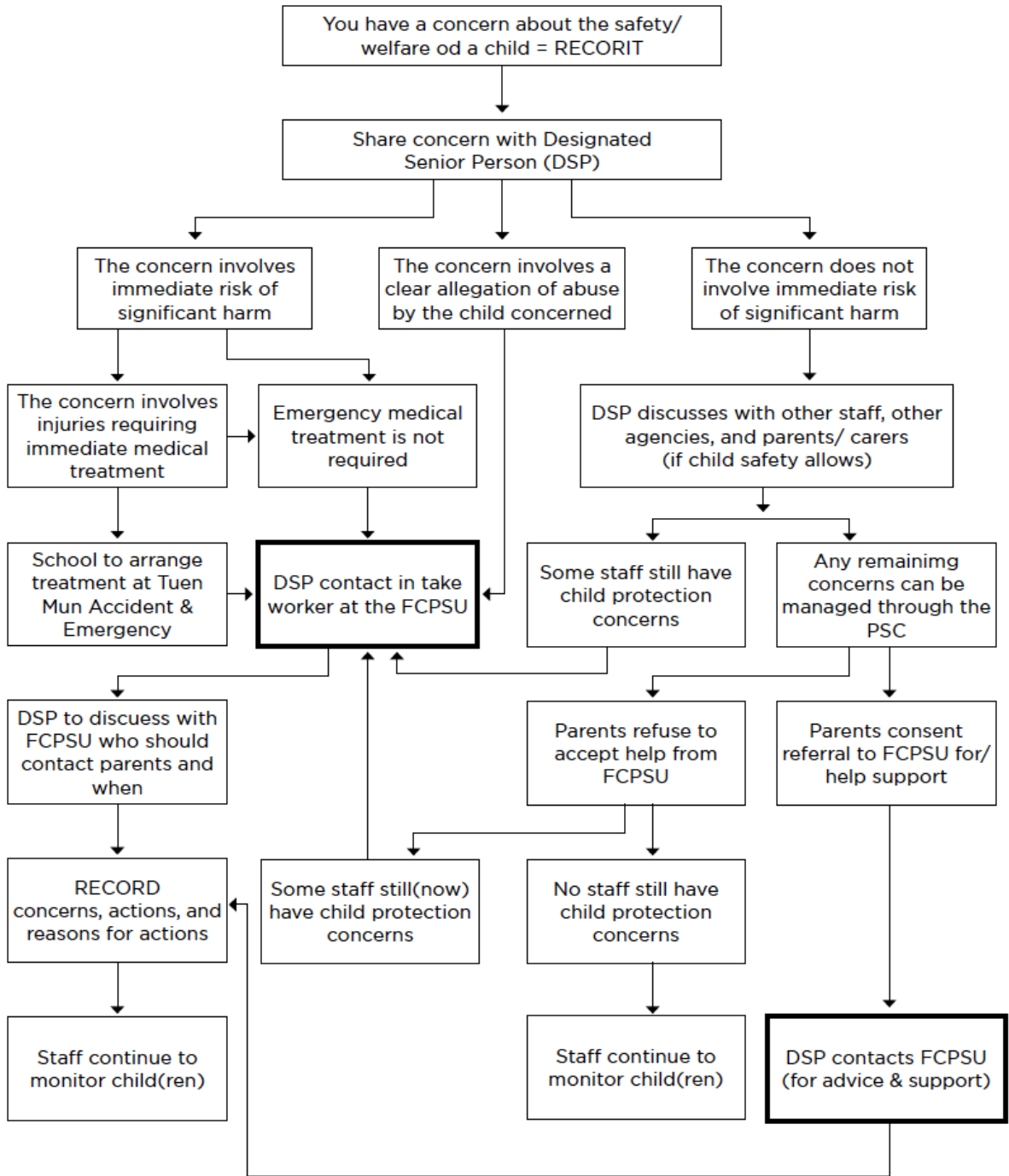
The Head:

Ann Haydon, ahaydon@harrowschool.hk

The Governor with responsibility for Child Protection:

Eric Leung, eleung@harrowis.com

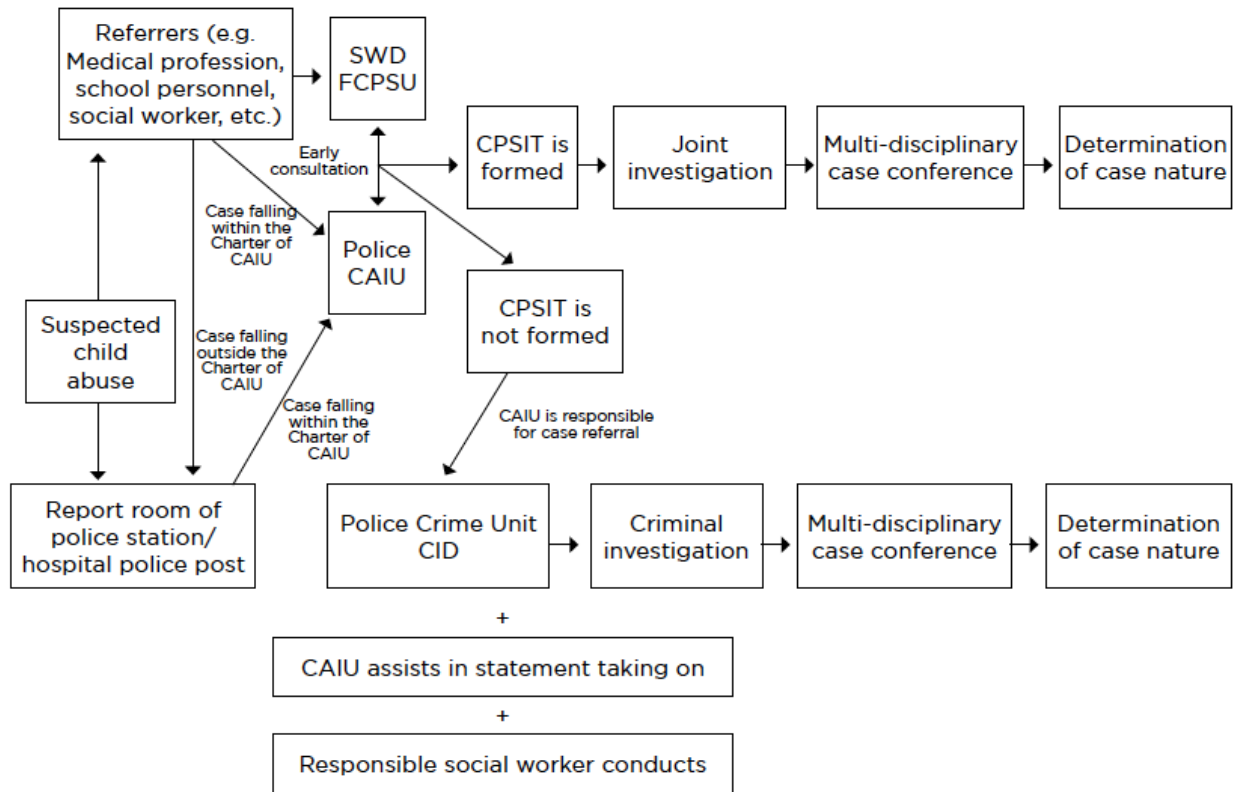
[\[back to start\]](#) **Appendix 9: Detailed Child Protection Flowchart**



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## Appendix 10

The process once a referral to FCPSU has been made:



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Full Name and Class/House of Pupil
Age and Date of Birth
Factual account of what happened, where and who was present, using the child's own words. Any opinions must be explained in detail. N.B. Remember not to ask leading questions.
Action Taken

Name & signature of Staff Member reporting this concern
Position
Date & Time
Date Record sheet given to the Designated Safeguarding Lead
Name & signature of Designated Safeguarding Lead to confirm receipt
Tom Hicks (Principal Deputy Head, Pastoral) <i>Signature:</i>
Date & Time

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## **Appendix 12**

### **Harrow Hong Kong Child Protection & Safeguarding - Staff Code Of Conduct**

1. Harrow Hong Kong is committed to the safety and protection of pupils. This Code of Conduct applies to all members of staff, external contractors, residents, volunteers and guests of the School and those who interact with pupils 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 Harrow 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 pupils, 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 show prudent discretion before touching a pupil, and be aware of how physical touch may be perceived or received, and whether it would be appropriate.
5. Harrow Hong Kong staff and volunteers are prohibited at all times from physically disciplining a child.
6. Physical contact with pupils can be misconstrued both by the recipient and by those who observe it, and should occur only when completely non-sexual and otherwise appropriate, and never in private.
7. One-on-one meetings with a pupil are best held in a public area; in a room where the interaction can be (or is being) observed; or in a room with the door left open or which has glass walls, and another staff member is notified about the meeting. Pupils should not be entertained in staff apartments.
8. We must always intervene when there is evidence of, or there is reasonable cause to suspect, that pupils are being abused in any way. Suspected abuse or neglect must be reported to the appropriate Harrow Hong Kong staff member, as described in the Harrow Hong Kong Child Protection and Safeguarding Policy.
9. No employees or visitors may inappropriately consume, use or be under the influence of alcohol and/or drugs when supervising or otherwise working with pupils. Harrow Hong Kong campus is a no-smoking zone and no form of tobacco or e-cigarettes should be used either off site, when supervising or otherwise working with pupils, or on site at any time.
10. Adults should never give pupils any drugs, (e-)cigarettes, images or reading material that is inappropriate.
11. Employees and volunteers should not accept gifts from pupils without permission from their manager and in accordance with the School's Gift Policy.
12. Communication with pupils is governed by the Harrow Hong Kong Staff ICT Acceptable Use Policy: all staff should be familiar with its contents.
13. If a staff member recognises that a pupil may be infatuated by them, their line manager must be informed immediately.

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

- hit, physically assault, or physically or psychologically abuse any child;
- act in ways towards any child that – also from a psychological point of view – 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 pupil of Harrow Hong Kong (of any age) or any former Harrow pupil under 21 years of age, irrespective of the definition of the age of majority or the way in which consent is legally recognised in the 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 Harrow Hong Kong children using online personal communication (e-mail, chats, social networks etc.) – only professional online tools and environments 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 pupil 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 Harrow 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 ‘Harrow Hong Kong Child Protection & Safeguarding - Code of Conduct’ as a condition of my providing services to the pupils and staff of Harrow Hong Kong.

Additionally:

- I will comply with the mandatory reporting regulations of Harrow Hong Kong to report suspected child abuse.
- I will cooperate fully in any investigation of abuse of pupils.
- I understand the School's Social Vision statement and agree to support it in all of my dealings related to School: **“A caring, respectful community in which everyone thrives”**
- I have read and understand the following documents/policies: Staff ICT Acceptable Use Policy, Professional Guidelines for Teachers and Administrative Staff and the Anti-Bullying and Harassment 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 of KCSIE (Keeping children safe in education) guidance issued by the UK Department of Education 2021.
- 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 ‘Harrow Hong Kong Child Protection & Safeguarding - Code of Conduct’ and that, as a person working with pupils, 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 Harrow Hong Kong.

Name: \_\_\_\_\_ JobTitle/Position: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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

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