

Po Leung Kuk
Child Safeguarding Policy

Chapter 1: Introduction and Purpose

1. Introduction

1.1 Po Leung Kuk (hereinafter referred to as "the Organization") adheres to the mission of "Protecting Children and Ensuring Their Well-being." Initially, it aimed to prevent the abduction of women and children by providing shelter and education for the victims. With the changes in Hong Kong society, it has become one of the oldest and most prominent charitable organizations in the territory. This mission aligns with the core principles of the "Child Protection Policy," which aims to safeguard children's rights and promote their safety and development.

1.2 The "Mandatory Reporting of Child Abuse Ordinance" (the "Ordinance") was passed in the Legislative Council on July 11, 2024, and published in the Gazette on July 19, 2024. To implement the Ordinance, which will take effect on January 20, 2026, the government has introduced various support measures, including the development of the "Policies for Mandatory Reporters" (the "Policies"). These Policies provide practical advice for designated professionals (i.e., mandated reporters) as specified in the Ordinance regarding mandatory reporting.

1.3 The Organization has developed the "Policies for the Protection of Children" to prevent and address suspected cases of child abuse, ensuring the safety and well-being of children so that they may grow up in a nurturing environment.

2. Purpose

2.1 Statement of Policies

2.1.1 The Organization complies with Hong Kong laws and relevant regulatory policies to ensure the safety of children.

2.1.2 The Organization adopts a zero-tolerance approach towards any form of harm to children and is committed to safeguarding children's rights. It actively creates and maintains a culture of safety within the Organization to prevent, detect, and stop behaviors that could expose children to any form of violence or harm, while providing appropriate support and referral.

2.1.3 The Organization believes that all children should have equal rights and require protection from harm or abuse, regardless of their status, gender, religion, or ethnicity.

2.2 Objectives of the Policies

2.2.1 The "Policies for the Protection of Children" reference the Ordinance and the Policies to establish relevant policies, measures, and procedures within the Organization. These are designed to assist designated professionals and individuals who may come into contact with children (including staff, interns, volunteers, vendors, contractors, and other community members) in understanding the principles of child protection and identifying cases that must be reported in accordance with their legal responsibilities. Chapter 2 outlines effective measures for child safety and protection, detailing the various measures and responsibilities the Organization implements in accordance with the Policies. Chapter 3 elaborates on the assessment process and execution details.

2.2.2 To protect all service users within the Organization's subordinate units and schools, including but not limited to all children under the age of 18 in education, social services, recreation, cultural services, and health and integrated health services.

2.2.3 In addition to the designated professionals specified in the Ordinance, the Organization will provide training to staff and parents/guardians of service users in subordinate units and schools. It will assist frontline staff in fully understanding child protection principles, definitions of child abuse, and related knowledge. Staff will also be guided on how to handle suspected cases of child abuse according to relevant policies and policies.

2.2.4 To promote children's rights, welfare, and development.

2.3 Core Principles

2.3.1 The safety and well-being of children are the foremost considerations. When handling relevant incidents, the principle of protecting children must be the starting point, ensuring the current safety of the affected children.

2.3.2 Ensure that children's rights to protection are not violated, and protect them from various forms of abuse, harm, and exploitation, thereby maintaining a supportive growth environment.

2.3.3 **Staff of service units and schools must take any suspected cases of harm or abuse against children seriously and address them promptly to prevent further escalation.** During this process, no person shall intentionally obstruct or hinder designated professionals from making a report or disclose the identity of those professionals who report.

2.3.4 All information related to cases must be treated with strict confidentiality to protect the privacy rights of the children and relevant parties.

2.3.5 Personnel at all levels and from different sectors must work together to ensure that children receive appropriate protection and follow-up care, while supporting the relevant children and families to safeguard their safety and best interests. The Organization will also strive to ensure that all related individuals, such as parents, caregivers, volunteers, interns, vendors, and service contractors, collaborate effectively to build a safe environment, providing children with sufficient protection for growth and development while fulfilling social responsibility.

2.4 Scope of the Policies

These policies apply to all staff and relevant personnel within all service units and schools under the Organization. This includes the Board of Directors, all staff members, volunteers, service contractors, and others associated with the Organization, all of whom must adhere to the "Policies for the Protection of Children."

Chapter 2: Effective Child Safety and Protection Measures

1. Implementation of Safe Recruitment Procedures

1.1 Multi-layered Personnel Screening

1.1.1 Interviews and Qualification Verification: Conduct in-depth assessments during interviews to evaluate candidates' awareness of child protection, and carry out qualification checks to ensure candidates meet the requirements for positions involving contact with children.

1.1.2 Sex Offense Background Checks: Applicants must provide a report of the "Sexual Conviction Record Check" issued by the Hong Kong Police Force, which will be verified by the Human Resources Department or designated representatives.

1.2 Contractual Obligations

1.2.1 Inclusion of Contractual Clauses: Employment contracts must stipulate adherence to all regulations, procedures, and codes of conduct set forth by the Organization, and be governed by the laws of the Hong Kong Special Administrative Region and the Organization's human resources policies.

1.2.2 Code of Conduct Compliance: Relevant service units and schools will integrate related content from the "Policies for the Protection of Children" into the "Employee Code of Conduct," which all employees must acknowledge and comply with.

1.3 Ongoing Management and Monitoring

Performance evaluations and supervision will be combined: Continuous monitoring of employees' execution in child protection will be ensured through staff supervision and regular performance evaluations, safeguarding that the employee code of conduct and relevant procedures are effectively implemented.

2. Community Awareness

2.1 Parent Collaboration: Strengthening Communication and Shared Awareness

2.1.1 Expanding Communication Channels: Establish regular communication platforms, such as parent notices, meetings, annual surveys, and a parent information section on the website, to keep parents informed about the content of the "Policies for the Protection of Children."

2.1.2 Professional Support: Invite professional organizations and on-campus social workers to conduct educational seminars while providing resources and support for child safety. This aims to guide parents in enhancing their children's safety awareness and promote a protective environment within families and institutions.

2.2 Empowering Children: Conveying and Listening in a Friendly Manner

2.2.1 Encourage various service units/schools to adopt diverse approaches to enhance children's self-protection awareness. Use language and formats that are easy for children to understand (e.g., lectures, practical demonstrations, role-playing) to communicate the content of the "Policies for the Protection of Children." Help children recognize their rights, identify situations of harm or abuse, understand who they can safely express their concerns to (e.g., informing a teacher or social worker), and learn to establish protective boundaries for themselves.

2.2.2 Service units/schools should also implement preventive and developmental counseling activities related to "sexual" issues, assisting children in learning how to protect their bodies, firmly resist others' offenses, and guide them to seek support from teachers, elders, counselors, or relevant agencies when needed.

2.3 Community Support: Clarifying Consensus and Collaboration Principles

2.3.1 Consensus on Reporting and Protection: Clearly communicate to parents and other community members that if Organization staff suspect cases of child abuse or harm, they will report them to the police, Social Welfare Department, Education Bureau, and other relevant agencies in accordance with the law. If neglect is suspected, protective actions will be taken according to established policies, and the understanding and support of all parties regarding such decisions will be sought to build a consensus on community protection.

2.3.2 Share presentations, short videos, and relevant agreements with partnering personnel, including volunteers (who will have contact with children) and interns, to clarify the behavioral boundaries expected in interactions with children.

2.3.3 Procurement documents for suppliers and contractors providing services to children must include a signed commitment to comply with child protection policies.

3. Staff Training

3.1 Training Targets: Comprehensive Coverage and Tiered Implementation

3.1.1 Core Staff Level: This includes all current employees (including members of the school-based management board). Basic and advanced specialized training will be provided according to different job responsibilities, ensuring that all staff are familiar with the "Policies for the Protection of Children" and procedures. They must be able to recognize signs and symptoms of different types of child abuse, handle information disclosed by children with caution, adhere to reporting procedures and confidentiality policies, and provide appropriate follow-up to ensure the safety and well-being of children.

3.1.2 New Staff Level: Child safety and protection training will be included as mandatory content in the induction training program for new employees. This ensures that they quickly grasp the core policies and operating procedures during their initial onboarding period. For example, newly appointed designated staff must complete the Social Welfare Department's "Online Child Protection

Course" and obtain the relevant certification within a specified timeframe.

3.2 Training Content

3.2.1 Training Objective: All training focuses on the goal of "enhancing protection awareness and improving practical skills."

3.2.2 Policies and Procedures: Employees are required to master and familiarize themselves with the content of the "Policies for the Protection of Children," the employee code of conduct, and specific operational procedures, clearly understanding their responsibilities and obligations in child protection.

3.2.3 Risk Identification and Handling: Staff will learn to identify signs and symptoms of different types of harm or abuse towards children, understand how to cautiously handle information disclosed by children, and strictly adhere to reporting procedures and confidentiality policies.

3.2.4 Educational and Support Skills: Employees will learn how to provide appropriate safety protection education programs to enhance children's self-protection awareness and abilities. Senior management will further develop professional skills in coordinating child protection efforts and responding to complex cases.

3.3 Training Format and Frequency

3.3.1 Regular professional development content will be provided for both current and new designated staff, offering training on child safety and protection. Additionally, updates on policy considerations will be provided to ensure the timeliness of information.

3.3.2 Designated staff must complete the government-established "Online Child Protection Course" and obtain the relevant certification to implement basic awareness.

3.3.3 Designated staff are required to participate in refresher courses regularly to reinforce training effectiveness.

3.3.4 Experts will be invited to conduct specialized training for the senior management team and members of the school-based management board, strengthening the decision-making capacity at the management level.

3.3.5 "Policies for the Protection of Children" introductory videos and training materials will be made available through online platforms to provide flexible training options, ensuring that staff efficiently master basic requirements.

3.4 Training Confirmation and Archiving

3.4.1 Confirmation of designated staff's careful reading of training materials, understanding, and commitment to comply with the policies will be validated through attendance records, online training records/certificates of completion, etc.

3.4.2 All training confirmation documents, copies of certificates, and other archival materials will be uniformly stored by the service units/schools, with a retention period of no less than three years

(for certificates, the retention period will extend until the employee leaves the organization). This will ensure that the training process is traceable and verifiable.

4. Ensuring a Safe Environment

Service units and schools must ensure that daily activity safety policies are established, including policies for outdoor activities, field trips, and daily care and transportation of children, to ensure that children have appropriate and safe arrangements. Service units and schools should also conduct activity risk assessments in advance for different types of activities according to the relevant policies to enhance safety measures and reduce the risk of accidents. Additionally, service units and schools should follow established crisis management policies to guide staff in responding swiftly to crisis situations, ensuring the safety of children.

5. Management and Review

5.1 Management and middle-level personnel of service units and schools must conduct regular work supervision and daily inspections to ensure that staff adhere to the code of conduct and child protection procedures. This also allows management to understand the doubts and difficulties faced by frontline staff in child protection, enabling them to provide appropriate guidance and support.

5.2 The internal performance evaluation for staff competency will include criteria related to child protection, promoting compliance and implementation of the "Policies for the Protection of Children" by all employees.

5.3 Designated personnel from various departments will regularly communicate and share insights to review the implementation of the policies across different departments. The policies will be reviewed every three years or as needed to ensure they meet social needs. During this period, the policies will be examined in real-time in response to societal conditions.

Chapter 3: Assessment Process and Implementation Policies

1. Assessment Process

1.1 Any employee on duty who becomes aware that a child is being harmed or abused must immediately intervene to stop the relevant behavior and ensure the child's safety. If the employee is at a non-professional level, **they must promptly report to their supervisor** and follow instructions.

1.2 Employees at a professional level need to conduct a preliminary assessment for the abused child, collecting basic information in accordance with the policies (such as the nature of the incident, the child's physical and psychological condition, the suspected abuser's identity, and the time and place of occurrence). However, they should avoid repeatedly questioning the child about details to prevent further trauma. Evidence of the incident, such as items used in the assault, should be preserved to ensure the completeness of information for subsequent investigations and legal proceedings.

1.3 **Employees must promptly report verbally to the unit supervisor/principal or higher**, review any relevant CCTV footage and archive it (if available), and initiate the internal handling process according to the service unit/school's policies, discussing the next steps for follow-up arrangements.

1.4 If the employee is a "designated professional," they must, where applicable, complete the decision-making flowchart and assistive analysis framework for assessing the child's condition through the "Reporting Electronic Platform" for Mandatory Reporting of Child Abuse, identifying whether it constitutes a "case of severe abuse requiring mandatory reporting." The assessment results are categorized as "not suspected of abuse," "general report of suspected abuse," or as incidents within the scope of the "Mandatory Reporting of Child Abuse Ordinance."

1.5 Employees must retain the assessment results and archive the records; the entire processing procedure must ensure the confidentiality of the child's and reporter's personal data.

1.6 In cases of "severe child abuse," designated professionals have a personal legal obligation to report suspected abuse cases under Section 4(1) of the "Mandatory Reporting of Child Abuse Ordinance," and the Organization cannot fulfill this responsibility on their behalf. If there are any disputes regarding the reporting arrangement, mandatory reporters may report independently; no one shall deliberately obstruct or hinder the process or disclose the identity of the reporter.

2. Implementation Policies

2.1 Immediate Measures to Protect Children's Safety

2.1.1 Immediate safety assurance for children

2.1.1.1 Immediately remove the child from the dangerous environment to ensure their personal safety.

2.1.1.2 If the child is physically injured or suspected of being injured, immediate arrangements must be made for them to be sent to a hospital for professional examination and treatment.

2.1.1.3 If the child faces severe and immediate risks of harm, such as life-threatening situations or

severe abuse, call 999 for assistance to facilitate police intervention and receive emergency treatment.

2.1.1.4 Before examining the child's injuries, the reasons must be explained to the child, and their consent obtained. It is recommended that two employees conduct the examination, but photographs of the child's injuries, especially those involving private parts, must not be taken to avoid invading personal privacy.

2.1.2 Restricting access of the suspected abuser

2.1.2.1 Prevent the suspected abuser from approaching the affected child and other related children to protect them from further risks of harm or abuse.

2.1.2.2 Arrange for the child to be placed in a safe location with trusted relatives, guardians, or government or social service agencies, whenever safe.

2.2 Cases Not Involving Suspected Child Abuse [See Appendix 1: General Reporting Flowchart for Suspected Child Abuse]

2.2.1 If the case is not suspected of abuse and does not involve staff:

2.2.1.1 Appropriate follow-up services will be provided by social workers from the referral unit/on-site social workers.

2.2.1.2 Contact parents/guardians to offer suitable counseling.

2.2.2 If the case is not suspected of abuse but involves staff:

It must be **reported to supervisors** and documented. Continuous monitoring and supervision of the staff member should be implemented, and the employee must complete refresher training within a specified timeframe.

2.3 General Reporting of Suspected Child Abuse Cases [See Appendix 1: General Reporting Flowchart for Suspected Child Abuse]

2.3.1 If suspected abuse cases do not meet the criteria for severe harm, follow the policies in Section 2.1, immediately implement child protection safety measures, and perform general reporting and support according to the Social Welfare Department's "Protecting Children from Maltreatment – Procedural Guide for Multi-disciplinary Co-operation" and the internal handling procedures of the service unit/school to continue data collection or monitoring.

2.3.2 If the suspected abuse case does **not involve staff**:

2.3.2.1 Report to the Family and Child Protection Services Unit (FCPSU) for handling (if it is a non-known case) or follow up through the relevant case's social worker (if it is a known case).

2.3.2.2 The unit **supervisor/principal or higher** must be promptly informed of the incident's progress.

2.3.2.3 Conduct data collection and contact parents/guardians to provide appropriate counseling, following the "Procedural Guide for Multi-disciplinary Co-operation".

2.3.2.4 Depending on service needs, prepare a detailed written report for the unit supervisor/principal or higher (the unit/school should keep a record for archiving).

2.3.3 If the suspected abuse case involves staff:

The unit supervisor/principal or higher must **report to the CEO**, Human Resources Department, and Corporate Communications and Public Relations Department.

2.4 Cases under the Scope of the "Mandatory Reporting of Child Abuse Ordinance" [See Appendix 2: Mandatory Reporting Flowchart]

2.4.1 Reporting Process and Method

2.4.1.1 If the decision-making flowchart assessment indicates no direct obligation for mandatory reporting but professional judgment determines that the case involves severe abuse, it must still be reported legally.

2.4.1.2 If there are reasonable grounds to suspect that a child "is suffering from severe harm" or "is facing a real risk of severe harm," an **immediate verbal report must be made to a supervisor and the department head**, and a legal report must be submitted as soon as possible under the "Mandatory Reporting of Child Abuse Ordinance":

- i. In emergencies, such as when the victim urgently needs rescue, treatment, or the authorities need to enforce the law, the mandatory reporter should first call 999 for emergency reporting and then **promptly report to their supervisor**.
- ii. In non-emergency situations, in addition to executing child protection safety measures as per Section 2.1, reports must be made immediately via phone or in person at any police station or to the Social Welfare Department's Family and Child Protection Services Unit. If a case has an assigned social worker from the Social Welfare Department or a non-governmental organization, they must also be informed.
- iii. After making a verbal report to the police/Social Welfare Department's Family and Child Protection Services Unit, the primary reporter must, where feasible, submit a written report and the required information through the "Reporting Platform - Mandatory Reporting of Child Abuse." Refer to "Policies for Mandatory Reporters, Section 3.1.2."
- iv. Once the reporting platform receives the completed written report, it will issue an acknowledgment receipt indicating the date of the report as a record.

2.4.2 Individual/Group Reporting Policies:

2.4.2.1 All suspected severe child abuse cases must be **reported to the unit supervisor/principal and then to the department head**, who will instruct whether the mandatory reporter should make an individual or group report.

2.4.2.2 As a principle, if only one mandatory reporter is aware of the incident, that individual will make the personal report. It is recommended that after making an individual report, the reporter notifies the service unit/school that the incident has been filed and provides a copy of the acknowledgment receipt to the unit supervisor/principal or higher for confidential filing.

2.4.2.3 If more than one mandatory reporter in the same service unit/school is aware of the incident, the unit supervisor/principal or higher will direct that the mandatory reporter who is most familiar with the case or the severe abuse incident be the primary reporter, with others being secondary reporters.

2.4.2.4 If the same case is being followed up by different service units/agencies/schools simultaneously, it is recommended to make a group report, with the service unit/agency/school that first discovered the suspected child abuse incident responsible for reporting, while other informed designated professionals will serve as secondary reporters.

2.4.2.5 The primary reporter for group reporting must provide a copy of the acknowledgment receipt to the unit supervisor/principal or higher, as well as to other reporters, to confirm the case has been reported; the receipt must be kept as a confidential document.

2.4.2.6 **All registered mandatory reporting cases should be reported to the CEO, Human Resources Department, and Corporate Communications and Public Relations Department.**

2.4.3 Follow-Up Work After Mandatory Reporting:

2.4.3.1 Ensure that the abused child is provided with safe care to prevent further violations.

2.4.3.2 Cooperate with investigations conducted by the police, Social Welfare Department's Family and Child Protection Services Unit, or other departments, and maintain close communication with different stakeholders involved in the child case, including family/guardians, case social workers, teachers, doctors, and police, providing appropriate information and cooperation for investigations, as well as attending multi-disciplinary case meetings as needed (refer to "Policies for Mandatory Reporters, Section 3.3").

2.4.3.3 **Timely report the event's progress to superiors** to receive directions for developing the best welfare plan for the child.

2.4.3.4 Assist in executing relevant child welfare plans as needed.

2.4.3.5 Clearly document and archive all information related to the incident for reference and verification.

2.4.3.6 Submit relevant incident reports on time as required by the Organization, the Social Welfare Department, or other government departments.

2.4.4 If an Employee is Suspected of Being the Abuser:

2.4.4.1 If an employee is suspected of being the abuser, **report immediately to the employee's supervisor, the CEO, Human Resources Department, and Corporate Communications and Public Relations Department.**

2.4.4.2 Immediately suspend the employee from duty and prohibit them from having contact with any service users and/or accessing unit documents/records, etc.

2.4.4.3 Follow up with the Human Resources Department on the procedures related to the suspension of duty. Notify the IT department to revoke the employee's computer access if necessary.

2.4.4.4 If multiple employees are involved as abusers and the suspension affects operational practices, other service units should coordinate with management for staff reassignment to provide support.

2.4.4.5 During the period of police investigation involving the employee, management should not discuss the content of the suspected child abuse incident with the employee to maintain impartiality.

2.4.4.6 If the investigated employee is ultimately determined not to be the abuser, arrangements should be made for their prompt return to work, and psychological counseling support services should be provided as needed and according to their wishes.

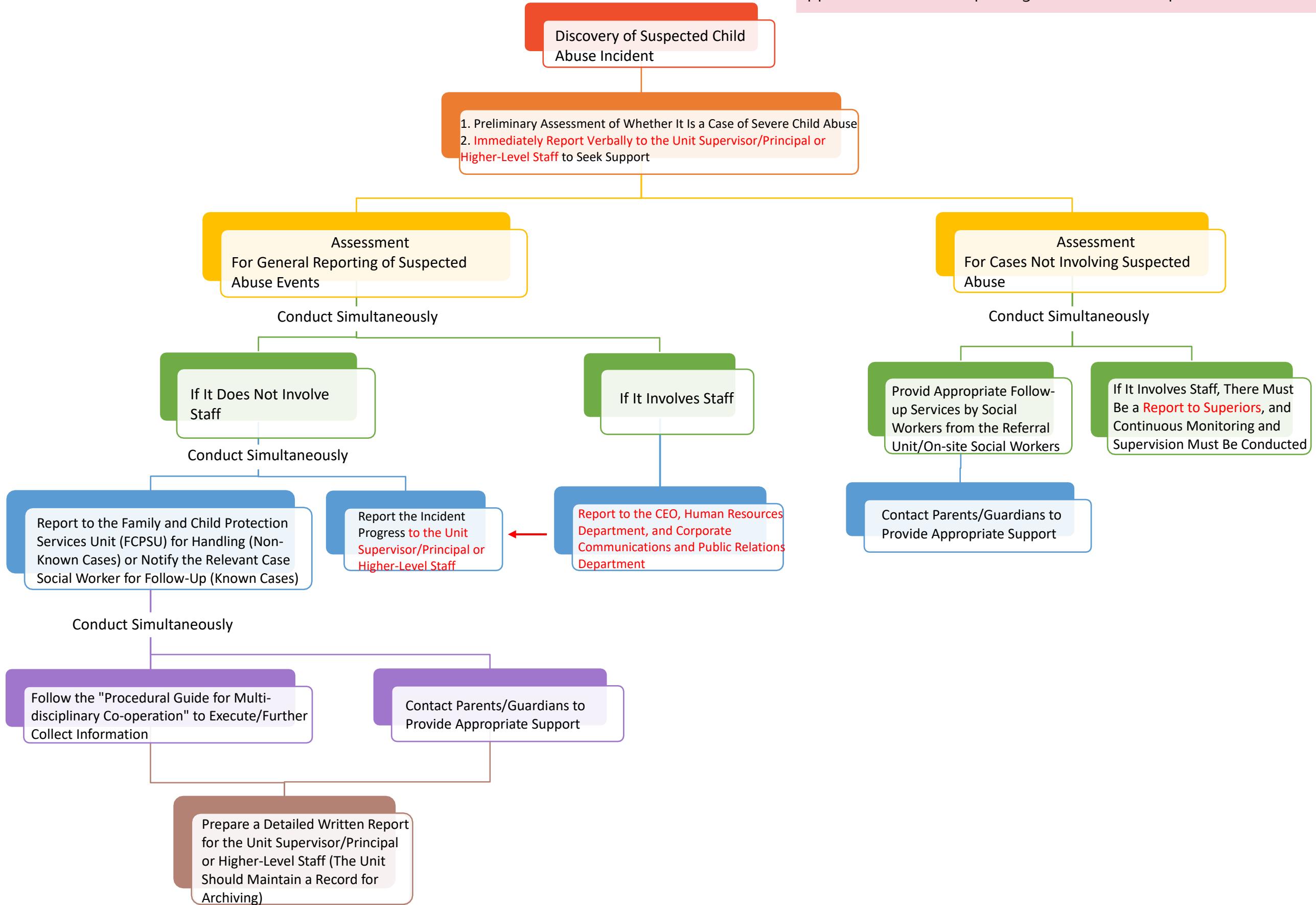
2.4.4.7 If the employee is ultimately determined to be the abuser, it will be handled according to the Organization's "Employee Disciplinary Policy."

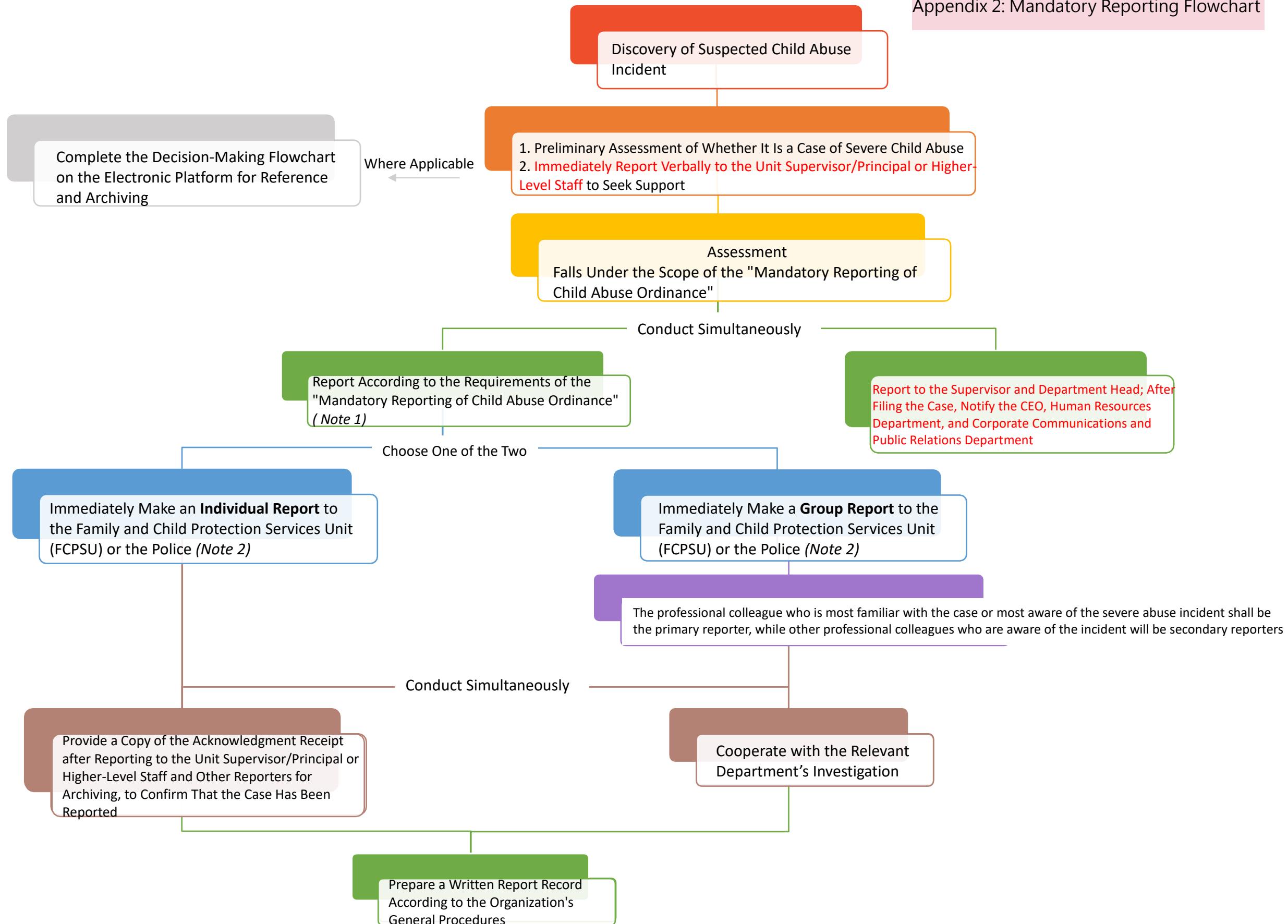
2.4.4.8 If the child abuse incident has affected service users, arrangements may be made for clinical psychologists to provide relevant evaluations and follow-up services as needed.

2.4.4.9 If the child abuse incident impacts team morale, consideration should be given to arranging employee support services as needed.

2.4.4.10 Submit relevant incident reports on time as required by the Organization, the Social Welfare Department, or other government departments.

Remarks: "Assessment Process and Implementation Policies," serves as fundamental policies that service units/schools must follow. However, the content of the "Policies" may not cover all practical operations of every service unit/school. Service units/schools may establish their own specific policies aligned with the "Mandatory Reporting of Child Abuse Ordinance."





Note 1: Designated professionals have a personal legal obligation to report suspected child abuse cases under Section 4(1) of the Ordinance; the organization cannot fulfill this responsibility on their behalf. If the employee makes a report before notifying the organization, it is recommended to inform the organization and provide the acknowledgment receipt to their supervisor.

Note 2: For details, please refer to the "Policies for Mandatory Reporters."