



CHILD PROTECTION AND SAFEGUARDING POLICY

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1 INTRODUCTION

1.1 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, digital safety (which should be taken to mean online safety as well as misuse of technology, including AI), medical provision, and alcohol and drugs and substance misuse. Policies and guidelines on these areas should be read in conjunction with this document and, in particular, the following:

- HS19 AISL Safeguarding Policy
- Staff Child Protection and Safeguarding Code of Conduct
- Staff ICT Acceptable Use Policy
- Digital Safeguarding Policy
- Pupil ICT Code of Conduct
- Professional Guidelines for Teachers and Administrative Staff
- Anti-Bullying and Harassment Policy
- Pupil Behaviour Policies
- HS22 Mental Health and Counselling Procedures (group policy and school procedures)
- HS24 Restraint and Reasonable Force Policy
- Low-Level Concerns Policy
- Whistleblowing and Confidential Reporting Policy
- Recruitment and Selection Policy and Procedures
- Campus Access and Security Policy
- Pupil Attendance and Supervision Policies
- Statement of Boarding Principles and Practice
- Health and Safety Policy (including First Aid and Crisis)

1.2 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 18th birthday, and this is the definition which the School adopts, although we will implement this policy for all pupils in our care insofar as local law allows.

1.3 Key Personnel

- **Designated Safeguarding Lead (DSL):**

Mr **Tom Hicks** (Principal Deputy Head, Pastoral and Wellbeing)
thicks@harrowschool.hk Mobile: 98644491

- **Deputy DSLs (DDSLs):**

Ms **Laura Yandell** (Principal Deputy Head, Curricular)
lyandell@harrowschool.hk

Mr **Brendan Shanahan** (Head of the Lower School)
bshanahan@harrowschool.hk

Ms **Kim Gratton** (Assistant Head, Pastoral and Wellbeing)
kgratton@harrowschool.hk

Mrs **Lauren Berner** (Deputy Head, Lower School Pupil Wellbeing)
lberner@harrowschool.hk

Mr **Chris Russell** (Assistant Head, Early Years)
crussell@harrowschool.hk

Ms **Wylie Chan** (Upper School Office Manager and PA to Principal Deputy Heads)
wchan@harrowschool.hk

Ms **Ginny Wong** (Lower School Office Manager and PA to Head of Lower School)
gwong@harrowschool.hk

Ms **Denise West** (Director of Human Resources)
dwest@harrowschool.hk

- **Governor with responsibility for Child Protection:**

Mr **Ahmed Hussain**, ahussain@harrowis.com

- **School Psychologist:**

Dr **Rachel Gregory**, rgregory@harrowschool.hk

- **School Counsellor:**

Mrs **Lauren Liu**, lliu@harrowschool.hk

Mr **Wing Kong**, wkong@harrowschool.hk

- **Independent Person**

Mrs **Rosheen Rodwell**, independentlistener@harrowschool.hk

In the absence of the DSL, DDSLs or the Head, all staff can make a referral directly to the Social Welfare Department or the Police.

Social Work Officer of the FCPSU in Tuen Mun: 2618 5614 / 2618 5710 / 9460 4046

SWD Departmental Hotline: 2343 2255

Castle Peak Police Station: 3661 1668

2 CHILD PROTECTION AND SAFEGUARDING POLICY

2.1 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 and 2004. 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 visitors of the School, who must ensure that the policy is adhered to at all times. It is a fundamental philosophy that staff should always act in the best interests of the children and should take a proactive approach to enabling all children to have the best outcomes.

2.2 There are five main elements to the policy:

- 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.
- Ensuring we practise safer recruitment in checking the suitability of all staff, contractors and volunteers who work at the School.
- Raising awareness of child protection issues and equipping children with the skills needed to keep themselves safe through the content of the curriculum.
- Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- Supporting pupils who have been abused in accordance with their agreed child protection plan.

2.2.1 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:

2.2.2 Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.

2.2.3 Ensure children know that there are adults in the school whom they can approach if they are worried.

2.2.4 Include opportunities in the formal and informal curriculum for children to develop the skills they need to recognise and stay safe from abuse, including recognising and reporting child-on-child abuse, harmful sexual behaviour and online abuse.

2.2.5 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, Minimum Standards for Boarding and the Independent Schools' Inspectorate (British Schools Overseas), in particular Keeping Children Safe in Education (KCSIE 2024); and worldwide through the UN Convention on the Rights of the Child (UNCRC).

2.2.6 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.

2.2.7 Ensure there is a Nominated Governor responsible for Child Protection. 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. Governors receive appropriate training in safeguarding.

2.2.8 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 all staff and volunteers, and when possible on contractors and other individuals.

2.2.9 Ensure every member of staff (including temporary staff, supply staff, contractors 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.

2.2.10 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.

2.2.11 Through regular staff training we will foster a culture of mutual respect between pupils and members of staff, with adults modelling good practice in this context. This may include opportunities for mental health first aid, suicide prevention, harmful sexual behaviours, and child-on-child abuse as appropriate to roles and responsibilities. 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.

2.2.12 Notify the Social Welfare Department if there is an unexplained absence of more than a week of any pupil, in line with EDB guidelines.

2.2.13 Develop effective links with relevant agencies in Hong Kong and co-operate as required with their enquiries regarding child protection matters.

2.2.14 Keep written, dated and signed (or secure electronic) records of concerns about children, even where there is no need to refer the matter immediately (ie: low-level concerns).

2.2.15 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 and staff or staff directly related in the care of the particular pupils (as deemed appropriate by the DSL). Records will be transferred to new schools in as timely a manner as possible (within 5 days as per best practice), within the context of local laws and compliant with regulations.

2.2.16 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 to be held on confidential staff files.

2.2.17 Risk assess all activities organised by the School that take place off the School's site; this includes, wherever possible, ensuring that the offsite providers have undertaken appropriate checks for their staff that will have contact with pupils from the School.

2.2.18 Ensure that any deficiencies or weaknesses in child protection arrangements are remedied without delay.

2.2.19 Reinforce the notion that all children regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity (so-called 'protected characteristics'), have a right to equal protection from all types of harm or abuse.

2.2.20 Remember that some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs, specific educational needs, disability or other individual needs (ie: contextual safeguarding).

2.2.21 Ensure all staff are aware of the additional risks and responsibilities relating to boarding schools and receive training appropriate to their roles in boarding

2.2.22 Ensure that systems for digital safeguarding are robust, including appropriate filtering and monitoring software which is checked regularly by staff, clear expectations for pupils around digital safety (including AI) and a graded approach to how pupils access digital tools depending on age and ability (including in Early Years and boarding). See the School's Digital Safeguarding Policy for more details.

2.2.23 Ensure that the school campus is secure, by employing a variety of means such as CCTV, security guards, perimeter fencing, effective securing of key areas such as boarding houses and risky areas as well as promoting safety through a robust approach to supervision, health and safety and risk management in the workplace, using data and regular review and an ongoing programme of maintenance.

2.3 The Children Act (1989) and KCSIE (2024) 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.

2.4 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.

2.5 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 bullying concerns will be referred to the Designated Safeguarding Lead and followed in line with the Prevention of Bullying and Behaviour Policies.

3 ROLE AND RESPONSIBILITIES (also see HS19)

3.1 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 is to:

3.1.1 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 their attention;

3.1.2 Ensure that appropriate information is available at the time of referral and that the referral is confirmed in writing under confidential cover;

3.1.3 Liaise with the SWD and other agencies, as appropriate;

3.1.4 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;

3.1.5 Ensure that a proper record is kept of any referral and action taken, and that this is kept safely and in confidence;

3.1.6 Manage and deliver staff child protection training and review the operation of the Child Protection Policy annually (with the Head and Safeguarding Governor) to ensure the procedures are working and that it complies with current best practice.

3.1.7 To perform regular checks of the Single Central Record

3.1.8 To monitor safety through reviewing regular reports of internet misuse or inappropriate online behaviour, taking action where appropriate. A review of the school's internet filtering and monitoring systems should be undertaken on at least an annual basis.

3.1.9 To promote online safety through the taught and wider curriculum, such as assemblies, awareness days and digital leadership opportunities.

3.1.10 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, who can deputise in the absence of the DSL.

3.1.11 The DSL and DDSLs must all renew their Level 3 training at least every two years.

3.2 The Head: in terms of safeguarding, the role of the Head is to:

3.2.1 Meet regularly with the DSL to ensure child protection risks are being appropriately recognised and responded to.

3.2.2 Along with the governing body, make sure the school's child protection policy and procedures are robust, up to date and include:

- a definition of all forms of abuse
- information about the signs and indicators of abuse
- what staff and volunteers should do if they have concerns about a child.

3.2.3 Ensure all staff and volunteers read, understand and follow the school's child protection policy and procedures and code of conduct for adults.

3.2.4 Read and understand national and local guidance about preventing and responding to abuse

3.2.5 Understand what's happening in the school's local area and how the safeguarding policies and procedures can meet the school's specific needs

3.2.6 Ensure all staff and volunteers receive regular child protection training

3.2.7 Put support systems in place for children who have experienced abuse, for example by arranging school counselling or contacting external support services

3.2.8 Ensure healthy relationships are promoted through the whole school ethos, lessons and assemblies

3.2.9 Make sure children know they can approach any member of staff or volunteer if they have a problem and that they will be listened to and taken seriously

3.2.10 Make sure sources of help are promoted around school so children know where to go to get help if they don't feel able to talk to a trusted adult

3.2.11 Provide parents with information about abuse including what action the school is taking to prevent it and support children affected by it

3.2.12 Ensure that the school site is safe and secure and that there are policies and procedures in place around school visitors and for the safe dropping off and picking up of children

3.2.13 Ensure that safeguarding and child protection policies and procedures are in place for school trips and events and that suitable risk assessments have been carried out.

3.2.14 When recruiting new staff and volunteers to work in school, the Head and governors must follow safer recruitment principles. They should ensure the appropriate checks have been carried out on staff and volunteers and make sure the school's records are up-to-date.

3.2.15 The Head and governors should support the DSL with the child protection referral process and ensure they and their deputies have sufficient time and resources to carry out their role. The Head and governors should challenge decisions if the school believes a child is at serious risk of harm and not receiving appropriate help.

3.2.16 Help the DSL inform parents about what's happening (unless there is reason to believe that doing so would put the child at further risk of harm).

3.2.17 Regularly review all safeguarding and child protection policies and procedures

3.2.18 Update safeguarding and child protection policies and procedures in the light of any lessons learned from a child protection incident.

3.2.19 If there are allegations of or concerns about abuse by a member of school staff or a volunteer, the Head and governors should liaise with the local authority as appropriate.

3.2.20 The DSL should provide the Head and governors with a report on child protection at least annually.

3.3 Responsibilities of all Members of Staff

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

3.3.2 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. 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.

3.3.3 It is expected that all departmental meetings held in school have Safeguarding, Health and Safety and Pupil Welfare as the top item in their agenda, in order to promote a culture of safeguarding.

3.4 Governance and Oversight

3.4.1 The School undergoes regular oversight visits at least annually from HISL (Harrow International Schools Limited) and AISL (Asia International School Limited) which incorporate a review of safeguarding.

3.4.2 It is expected that the School undertakes an annual internal audit of its safeguarding procedures (with a summary report presented to Governors) and a biannual external audit.

3.4.3 The DSL and DDSL team are invited to be part of the AISL Harrow Schools Safeguarding Network which provides up-to-date discussion and a chance to share best practice

3.4.4 The Safeguarding Governor has regular check-in meetings with the DSL

3.4.5 All governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

3.4.6 The Governors should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, and their local multi-agency safeguarding arrangements.

3.4.7 Governors should ensure the School has appropriate filters and monitoring systems in place and also regularly review their effectiveness. They should also ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

3.5 Whistleblowing/Confidential reporting

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 Whistleblowing and Confidential Reporting Policy.

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.

4 CHILD ABUSE

4.1 All members of the school staff should be alert to the possible signs of abuse of a pupil, keeping an open mind that 'abuse could happen here' and to refer concerns as soon as they arise. Conversations with the DSL or deputies starting 'This may be nothing, but...' can help staff overcome barriers to reporting.

4.2 Abuse may take several forms, which are not mutually exclusive. It is also important to remember that abuse can take place online as well as in-person:

4.2.1 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.

4.2.2 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.

4.2.3 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 KCSIE 2024, 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, behaviour and exclusion policies.

4.2.4 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."

4.2.5 **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 and Counselling Team. In each case the School's Designated Safeguarding Lead must be informed.

5 PROCEDURES

5.1 Cases where abuse may have been inflicted by parents or carers

5.1.1 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.

5.1.2 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.

5.1.3 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.

5.2 Cases where abuse may have been inflicted by staff or volunteers

5.2.1 Allegations management procedures, as laid out below (see also Appendix A), 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

5.2.2 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.

5.2.3 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.

5.2.4 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 will 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.

- i) Procedures need to be applied with common sense and judgement.
- ii) Allegations found to be malicious will be removed from personnel records.
- iii) 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.

5.2.5 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.

5.2.6 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 fixed-term or permanent exclusion.

5.3 Cases where abuse may have been inflicted by a pupil (child-on-child abuse) See also Child-on-Child abuse policy.

5.3.1 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.

5.3.2 Allegations and reports of bullying should be reported on CPOMS and the Safeguarding Team will assess if the case meets the threshold for child-on-child abuse. 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.

5.3.3 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 child-on-child abuse will be addressed through the curriculum. Any incidents will be recorded and patterns will be investigated in line with the School's behaviour policy.

5.3.4 It is recognised that the forced sharing of nude or semi-nude images and the use of such images to extort or influence an individual can constitute child-on-child abuse and cause significant harm. Appropriate investigation, disciplinary action and support for the victim will be put in place.

5.3.5 As regards harmful sexual behaviour, reference may be made to the Brook traffic light tool (see appendices).

5.3.6 Whilst the School holds a 'zero-tolerance' stance on child-on-child abuse, each case will be considered in its own way as appropriate, taking into account the child's wishes (and the family's, where appropriate), their age, any specific risk factors such as SEND or disability, and a support plan will be put in place. This may include referral to counselling support in-school or externally.

5.3.7 Follow-up action should include disciplinary and/or restorative action for the perpetrator, including exclusion.

5.3.8 Where a case is being investigated, a risk assessment should be put in place to mitigate further harm.

5.3.9 The School recognises the heightened vulnerability of SEND pupils to child-on-child abuse

5.3.10 The School recognises that even when there are no reported cases of child-on-child abuse, this does not mean it is not happening. A healthy vigilance at all times is encouraged, with any signs of concern to be reported immediately.

5.4 Complaints and Allegations

5.4.1 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.

5.4.2 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.

5.4.3 If an allegation is made about a member of residential boarding staff, the School will seek to arrange alternative accommodation with the member of staff while any investigation takes place.

6 ALLEGATIONS INVOLVING SEXUAL IMPROPRIETY

6.1 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:

6.1.1 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).

6.1.2 Contact the Designated Safeguarding Lead immediately, who will discuss with the Head and, as appropriate, the SWD, to determine if a referral is required.

6.1.3 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 School Psychologist) will interview the complainant and report as quickly as possible to the Head, who will oversee the disciplinary aspects of the enquiry.

6.1.4 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.

6.2 This policy should be implemented regardless of whether the complainant is over or under 16 because of the potential for an abuse of trust. 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.

7 STAFF CODE OF CONDUCT

7.1 Cordial relations between teaching staff and pupils are at the heart of a happy and thriving boarding 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' and the 'Professional Guidelines for Teachers and Administrative Staff' in the Staff Handbook.

7.2 Over-familiarity, however well intentioned, can lead to serious moral and legal complications. Members of staff must be aware of the possibility of accusations and try to avoid potentially hazardous situations.

7.3 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.

7.4 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.

7.5 Particular care should be taken when carrying out sports coaching, swimming, drama, music tuition or with very young pupils (especially Early Years) 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.

7.6 Working in a boarding school, by its nature, gives staff a chance to develop close relations with and support pupils in a home-from-home context. Whilst this has many benefits for staff and pupils, there are risks involved in working in a boarding environment and staff should be extra vigilant to avoid putting themselves in vulnerable situations, or situations which might be misconstrued. HMs will give additional training and guidance to the staff in their Houses about appropriate and boarding-specific behaviours and conduct. If in doubt, contact the Designated Safeguarding Lead or Pastoral Senior Leaders for guidance.

7.7 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 and Digital Safeguarding Policy. Good practice includes valuing and respecting children as individuals, and the adult modelling 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 until the pupil has left university. Special care must be taken when using cameras or mobile devices, especially in Early Years. Mobile phones must not be used anywhere within the Early Years Centre in the presence of children (unless in the case of emergency).

Only digital devices owned by the school should be used to take photos and / or videos of pupils and their learning.

7.8 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".

8 PROCEDURES FOR REPORTING CONCERNS

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

- The conduct of a member of staff;
- A child, parent or member of staff “disclosing” abuse;
- Bruising or evidence of physical hurt; which may or may not be accompanied by unusual behaviours by a child.

8.2 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.

8.3 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.

8.4 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.

9 WHAT TO DO IF A CHILD DISCLOSES

9.1 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.**

9.1.1 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.

9.1.2 When the interview has finished, make sure the pupil feels secure and explain what you are going to do next.

9.1.3 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.

9.1.4 Stay calm and convey this through word and action; reassure the pupil that you are taking what they have to say seriously.

9.1.5 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.

9.2 Confidentiality

9.2.1 The management of confidentiality is an essential factor in all issues relating to Child Protection.

9.2.2 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.

9.2.3 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, or if there is evidence of law-breaking.

9.3 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**

It's not their fault; glad they told you etc.

- **Allow the child to talk / finish the story**

Don't question the child until they have finished speaking, and then you can prompt by open questions such as 'is there anything else you would like to tell me?'. Avoid closed or leading questions.

- **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.

- **Check that the child is safe and ready to go back to their class or activity.** If they are too distressed to do so, they should be accompanied to the Health Care Centre. A school counsellor can be called to support them.

9.4 Early Help

9.4.1 It is acknowledged that acting as early as possible to support children at risk. The NSPCC states: 'Providing timely support is vital. Identifying and addressing a child or family's needs early on can increase protective factors that positively influence a child's wellbeing, and decrease risk factors that may be impacting a child's life negatively. Research suggests that early help and intervention can protect children from harm, reduce the need for a referral to child protection services, improve children's long-term outcomes, improve children's home and family life and support children to develop strengths and skills to prepare them for adult life.

9.4.2 Harrow Hong Kong has a well-developed counselling team, led by the School Psychologist. Early intervention can be offered in the form of the School Psychologist themselves, Health Care Centre nurses, school counsellors Youth Mental Health Practitioners, or the Assistant Psychologist.

9.4.3 The School's support systems are best placed to intervene at an early stage and will work with the DSL/DDSLs, the child and their family to signpost the most appropriate follow-up support on a case-by-case basis.

9.4.4 Staff are reminded regularly that action should be taken as soon as there are concerns about a child.

10 THE PROCESS OF REFERRAL

10.1 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 relevant office of the Social Welfare Department

10.2 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.

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

- The immediate cause for concern and any immediate danger
- The child's full name, date of birth, address, I.D. number and disability or special needs of the child
- The child's whereabouts
- Name and HKID number of parents or carers and details of other members of the household e.g. siblings.
- Name of the family doctor
- Name of school
- Name, post and phone number of contact person
- Name of other witnesses and other agencies
- 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 5614 / 2618 5710 / 9460 4046**

SWD Departmental Hotline **2343 2255**

11 SAFER RECRUITMENT

11.1 Before commencing employment at the School, all staff and contractors 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 2024 '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 HR Department ensure all necessary checks are in place and recorded on the Single Central Register (SCR).

Full details of the School's recruitment procedures can be found in the Recruitment and Selection Policy on the School's website.

11.2 Volunteers, Parent Helpers and External Providers have specific induction and checking procedures which can be found in the Volunteer Policy.

12 REFERENCES

12.1 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.
- KCSIE 2024
- The UK Children Act 1989 & 2004
- Standards for British Schools Overseas (DFE 2023)
- Working Together to Safeguard Children (UK Government 2023)
- NSPCC
- Protecting Children from Maltreatment – Procedural Guide for Multi-disciplinary Co-operation (Revised 2020) (Hong Kong Government)

Owner: Principal Deputy Head (Pastoral and Wellbeing)

Updated: January 2025

Review Date: April 2025

13 Appendices

Appendix A - Allegations Management

Appendix B - Who to talk to? Worries and Complaints

Appendix C - Definitions and potential indicators of abuse

Appendix D - Child Protection and Safeguarding: Disclosures & Reporting Flowchart

Appendix E - Child Protection: Allegations Against Staff/Volunteers Flowchart

Appendix F - Harrow Hong Kong Safeguarding Concern Form

Appendix G - Child Protection & Safeguarding - Staff Code of Conduct

Appendix H - Brook Traffic Light Tool for Identifying Harmful Sexual Behaviours

Appendix A: Allegations Management

1. 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.

2. All staff in the School should report such an allegation immediately to the Head (or in their absence, the Safeguarding Governor). The only exceptions to this is if the allegation concerns the Head, in which case it should be reported to the Safeguarding Governor. The Head should not be informed if an allegation is being made against them.

3. On being advised of an allegation which meets the criteria, the DSL, Head or Safeguarding Governor 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.'

4. A secure record should be kept of all discussions relating to the allegation.

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

The Castle Peak Police Station number is 3661 1668.

6. In cases where an allegation is made about an organisation or individual using the school premises outside of school time (eg: summer camps, weekend school), the Head, DSL or Safeguarding Governor will contact the Social Welfare Department and the management of the organisation (where this is not the person subject to allegation).

Appendix B: WHO TO TALK TO?

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 School Psychologist or Counsellors
- The Independent Person
- A member of SLT

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)

Appendix C: Definitions and Potential Indicators Of Abuse

1. Understanding of Child Abuse

1.1 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: child-on-child abuse). Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

1.2 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.

1.3 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. Types of Child Abuse: See Section 4 of the Policy

3. Indicators Of Possible Child Abuse

3.1 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.

3.2 The list of indicators presented here 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.

3.3 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).

4. Checklist for Identifying Possible Child Abuse

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 of the child and any added factors which may make them more vulnerable (eg: protected characteristics, SEND, disability)

4.1 Physical Abuse

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.

4.1.1 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.
- Dermal melanocytosis (Mongolian Spots) are non-cancerous blue or blue-gray spots on the back, buttocks, base of spine, shoulders, or other body areas and can affect younger, often Asian, children. The markings may cover a large area of the back and are usually flat with irregular shape and unclear edges, normal in skin texture and 2 to 8 centimeters wide or larger. Dermal melanocytosis is sometimes mistaken for bruises. This can raise a question about possible child abuse. It is important to recognize that dermal melanocytosis is a birthmark, not bruises.

4.1.2 Lacerations and Abrasions

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

4.1.3 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.

4.1.4 Fractures

- These should be interpreted / handled individually.

4.1.5 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.000

4.1.6 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.

4.2 Sexual Abuse (Both sexes)

4.2.1 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

4.2.2 Behavioural Indicators

- Appetite disturbance
- Sexual exploitation of young children
- Poor peer relationships
- Unwilling to participate in physical activities
- Behaviour disturbance (anorexia nervosa, obesity, self-mutilation, runaway, suicide, promiscuity, drug abuse)
- Sexual knowledge/behaviour/language 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

4.3 Neglect

4.3.1 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

4.3.2 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

4.4 Psychological / Emotional Abuse

4.4.1 Physical Indicators

- Failure to thrive
- Developmental delay e.g. speech disorder
- Disordered eating

4.4.2 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/Inappropriate punishment
- Domestic abuse

5. Characteristics Commonly Associated With Child Abuse

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.

6. The Family

- Chaotic or obsessively organised home
- Social isolation
- Crisis or tension in family such as pregnancy, eviction, divorce / desertion / separation, in-law conflict
- Cultural / superstitious beliefs
- Domestic violence

7. The Parents

7.1 Biography

History of childhood abuse

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

7.2 Attitude and Behaviour

- Rigid or unreasonable expectations of the child
- Strong belief in harsh discipline / corporal punishment
- Overtly critical of or aloof to the child
- Immaturity of parents
- Low self-esteem
- Passiveness
- Low intelligence of one or both parents
- Low tolerance to stress
- Deficiency in anger control
- Diffusion and confusion in family roles
- Sexual problems

- Unconvincing or inconsistent explanations of the child's injury
- Failure or delay in seeking medical advice
- Inadequate parenting

8. The Child

- Premature birth
- Unwanted child
- Illegitimate child
- Baby with feeding or sleeping problem
- Non-thriving baby
- Early separation from parents
- Complicated birth delivery
- Child exposed to conflicting childcare practices
- Child with physical or mental disability
- Child associated with family misfortune
- Females in some cultures
- LGBTQ+
- SEND

9. Other forms of abuse which staff should be aware of are:

- Children missing from education
- Child sexual exploitation
- Child criminal exploitation
- Domestic abuse
- So called 'honour-based' violence, female genital mutilation (FGM), forced marriage and breast ironing
- Radicalisation
- Children with family members in prison
- Child on child abuse
- Sexual violence and sexual harassment

These may manifest as:

1. Children missing from education; A child going missing from education is a potential indicator of abuse or neglect. Staff and community members (including parents and carers) should report any poor student attendance or absences which cause concern to the safeguarding officers or the DSL, particularly on repeat occasions and/or over prolonged periods of time, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of the child going missing in future.

2. Child sexual exploitation (CSE); This involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship to serious organised crime by gangs and groups. The perpetrator/s always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important

to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

3. Female Genital Mutilation (FGM); This comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. AISL follows UK advice in this area: it is mandatory to report FGM disclosures that concern any female under the age of 18.

4. Radicalisation; This refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. As with managing other safeguarding risks, staff should be alert to changes in a child's behaviour which could indicate that they may be in need of help or protection.

5. Forced marriage/abduction; In some cultures, forced marriages are still regarded as acceptable. Any member of staff who considers a child at risk of this particular form of abuse, should report it immediately to a member of the safeguarding team.

Appendix D: 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 or make a referral on CPOMS to make a written record. Give the completed form to the Designated Safeguarding Lead 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 Mobile: 98644491

- **Deputy DSLs (DDSLs):**

Ms Laura Yandell (Principal Deputy Head, Curricular) lyandell@harrowschool.hk

Mr Brendan Shanahan (Head of the Lower School) bshanahan@harrowschool.hk

Ms Kirsten McLintock (Deputy Head, Pastoral and Wellbeing) kmclintock@harrowschool.hk

Ms Kim Gration (Assistant Head, Pastoral and Wellbeing) kgration@harrowschool.hk

Mrs Lauren Berner (Deputy Head, Lower School Pupil Wellbeing) lberner@harrowschool.hk

Mr Chris Russell (Assistant Head, Early Years) crussell@harrowschool.hk

Mrs Denise West (Director of Human Resources) dwest@harrowschool.hk

Ms Wylie Chan (Upper School Office Manager and PA to Principal Deputy Heads)
wchan@harrowschool.hk

Ms Ginny Wong (Lower School Office Manager and PA to Head of Lower School)
gwong@harrowschool.hk

- **Governor with responsibility for Child Protection:**

Mr **Ahmed Hussain** ahussain@harrowis.com

- **School Psychologist:**

Dr **Rachel Gregory** rgregory@harrowschool.hk

Appendix E: 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:

Mr **Ahmed Hussain** ahussain@harrowis.com



HARROW HONG KONG
SAFEGUARDING CONCERN FORM
APPENDIX F

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) Signature:	Date & Time

Appendix G: 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 (in line with the School's policy on Restraint and Reasonable use of Force).
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 Designated Safeguarding Lead immediately.
9. Staff must report low-level concerns to the HR Director immediately and should be aware of the School's whistleblowing policy and procedures.
10. 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.
11. Adults should never give pupils any drugs, (e-)cigarettes, images or reading material that is inappropriate.
12. Employees and volunteers should only accept gifts from pupils in accordance with the School's Gift Policy.
13. Communication with pupils is governed by the Harrow Hong Kong Staff ICT Acceptable Use Policy: all staff should be familiar with its contents.
14. 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 they actually are 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, 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 and school 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 recognise that if I am subject to an investigation of abuse, I may be asked to live away from boarding houses during the period of investigation.
- 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 2024 (or Annex A for staff not in direct contact with children).
- I have attended or seen an up-to-date presentation from the Designated Safeguarding Lead on child protection and safeguarding in the School.

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

Appendix H: Brook Traffic Light Tool for Identifying Harmful Sexual Behaviours



SEXUAL BEHAVIOURS



Behaviours: age 0 to 5 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

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Brook Sexual Behaviours Traffic Light Tool adapted with permission from True Relationships & Reproductive Health, (2012), Traffic Lights guide to sexual behaviours in children and young people: identify, understand and respond. Brisbane: True Relationships & Reproductive Health, Australia.

United Company registered in England and Wales, number 2466940. Registered Charity in England and Wales, number 700015. Registered Charity in Scotland, number SC045786.

Behaviours: age 5 to 9 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

Amber behaviours

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

Red behaviours

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

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Behaviours: age 9 to 13 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peer

Amber behaviours

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

Red behaviours

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.

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Behaviours: age 13 to 17 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- aking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult-only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

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