



HARROW
INTERNATIONAL
SCHOOL
HONG KONG

2025-26

CHILD PROTECTION AND SAFEGUARDING POLICY

Educational Excellence for Life and Leadership



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):**

Ms **Rosie Mccoll** (Head) rmccoll@harrowschool.hk; Mobile: 95414001

- **Deputy Designated Safeguarding Leads (DDSLs):**

Ms **Laura Yandell** (Senior Deputy Head, Whole School)

lyandell@harrowschool.hk

Mr **Brendan Shanahan** (Head of the Lower School)

bshanahan@harrowschool.hk

Mrs **Lauren Berner** (Deputy Head of Lower School (Pastoral, Co-Curricular and Organisation))

lberner@harrowschool.hk

Ms **Kim Gration** (Assistant Head (Prep School, Pastoral and Wellbeing))

kgration@harrowschool.hk

Ms **Naina Nightingale** (Assistant Head (Senior School, Pastoral and Wellbeing))

nnightingale@harrowschool.hk

Ms **Wylie Chan** (Upper School Office Manager and PA to US SLT)

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@aisl-edu.com

- **School Psychologist:**

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

- **School Counsellors:**

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

Mr **Jeffrey Man**, jman@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:

- 2.2.1 Establishing a positive, supportive, secure environment in which children can learn and develop, together with a school ethos that promotes, in all pupils, a sense of being valued.
- 2.2.2 Ensuring we practise safer recruitment in checking the suitability of all staff, contractors and volunteers who work at the School.
- 2.2.3 Raising awareness of child protection issues and equipping children with the skills needed to keep themselves safe through the content of the curriculum.
- 2.2.4 Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- 2.2.5 Supporting pupils who have been abused in accordance with their agreed child protection plan.

- 2.3 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:

- 2.3.1 Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- 2.3.2 Ensure children know that there are adults in the school whom they can approach if they are worried.
- 2.3.3 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.
- 2.3.4 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 2025); and worldwide through the UN Convention on the Rights of the Child (UNCRC).
- 2.3.5 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 DDSs.
- 2.3.6 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.
- 2.3.7 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.
- 2.3.8 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.

- 2.3.9 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.
- 2.3.10 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.
- 2.3.11 Notify the Social Welfare Department if there is an unexplained absence of more than a week of any pupil, in line with EDB guidelines.
- 2.3.12 Develop effective links with relevant agencies in Hong Kong and co-operate as required with their enquiries regarding child protection matters.
- 2.3.13 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).
- 2.3.14 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.
- 2.3.15 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.
- 2.3.16 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.
- 2.3.17 Ensure that any deficiencies or weaknesses in child protection arrangements are remedied without delay.
- 2.3.18 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.
- 2.3.19 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).
- 2.3.20 Ensure all staff are aware of the additional risks and responsibilities relating to boarding schools and receive training appropriate to their roles in boarding.
- 2.3.21 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.
- 2.3.22 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.

- 2.3.23 Have oversight of the policy and practices in place regarding e-safety with an appropriate understanding of the school's systems for the filtering and monitoring of internet and network use, review such provision annually whilst ensuring all staff are appropriately e-safety trained and made aware of the school's designated roles and responsibilities for internet filtering and monitoring.
- 2.4 The Children Act (1989) and KCSIE (2025) 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.
- 2.5 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.
- 2.6 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.
- 2.7 All children regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of abuse, neglect and exploitation. All staff are fully committed to protecting children from maltreatment, whether that is within or outside of the home. This includes keeping children safe from potential harm when online, including harm borne from exposure to disinformation, misinformation and conspiracy theories, and the misuse of artificial intelligence.

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.
- 3.2 The role of the DSL is to:
- 3.2.1 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;
 - 3.2.2 Ensure that appropriate information is available at the time of referral and that the referral is confirmed in writing under confidential cover;
 - 3.2.3 Liaise with the SWD and other agencies, as appropriate;
 - 3.2.4 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;
 - 3.2.5 Ensure that a proper record is kept of any referral and action taken, and that this is kept safely and in confidence;
 - 3.2.6 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;
 - 3.2.7 To perform regular checks of the Single Central Record;
 - 3.2.8 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;
 - 3.2.9 To promote online safety through the taught and wider curriculum, such as assemblies, awareness days and digital leadership opportunities;
 - 3.2.10 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;
 - 3.2.11 The DSL and DDSLs must all renew their Level 3 training at least every two years;
 - 3.2.12 Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service or other relevant local and/or international body
- 3.3 **The Head: in terms of safeguarding, the role of the Head is to:**
- 3.3.1 Meet regularly with the DSL to ensure child protection risks are being appropriately recognised and responded to.
 - 3.3.2 Along with the governing body, make sure the school's child protection policy and procedures are robust, up to date and include:
 - 3.3.2.1 a definition of all forms of abuse
 - 3.3.2.2 information about the signs and indicators of abuse
 - 3.3.2.3 what staff and volunteers should do if they have concerns about a child.
 - 3.3.3 Ensure all staff and volunteers read, understand and follow the school's child protection policy and procedures and code of conduct for adults.
 - 3.3.4 Read and understand national and local guidance about preventing and responding to abuse.

- 3.3.5 Understand what's happening in the school's local area and how the safeguarding policies and procedures can meet the school's specific needs.
- 3.3.6 Ensure all staff and volunteers receive regular child protection training.
- 3.3.7 Put support systems in place for children who have experienced abuse, for example by arranging school counselling or contacting external support services.
- 3.3.8 Ensure healthy relationships are promoted through the whole school ethos, lessons and assemblies.
- 3.3.9 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.
- 3.3.10 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.
- 3.3.11 Provide parents with information about abuse including what action the school is taking to prevent it and support children affected by it.
- 3.3.12 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.
- 3.3.13 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.
- 3.3.14 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.
- 3.3.15 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.
- 3.3.16 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).
- 3.3.17 Regularly review all safeguarding and child protection policies and procedures.
- 3.3.18 Update safeguarding and child protection policies and procedures in the light of any lessons learned from a child protection incident.
- 3.3.19 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.
- 3.3.20 The DSL should provide the Head and governors with a report on child protection at least annually.

3.4 Responsibilities of all Members of Staff

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

Members of staff have a duty to report all suspicions of abuse to the Designated Safeguarding Lead, (or a DDSL in their absence), who will then inform the Head. The Head or the DSL will then inform the Governor with responsibility for child protection. 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.

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.

3.5 Governance and Oversight

3.5.1 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.

3.5.2 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.

3.5.3 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.

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

3.5.5 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.

3.5.6 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.

3.5.7 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.

3.6 Whistleblowing/Confidential reporting

3.6.1 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.

3.6.2 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.

3.7 Role of the Board of Governors (BOG)

The BOG has overall responsibility to ensure policy and procedures for safeguarding. It is the role of the BOG to provide scrutiny of safeguarding policy and practice. The BOG takes seriously its responsibility to fulfil its duty of care in promoting the welfare and wellbeing of students, ensuring their security and protecting them from harm. To this end the BOG will ensure that:

3.7.1 An effective, up to date safeguarding policy is in place and made available to the staff and on the school website

3.7.2 Appropriate policies and procedures are in place and are operational

3.7.3 Required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register

3.7.4 All staff receive safeguarding training in accordance with this policy

3.7.5 Students are educated on how to remain safe, including online safety

3.7.6 Appropriate filters and monitoring systems are in place to keep students safe online

3.7.7 Ensure important information sharing between school, relevant practitioners and local agencies takes place.

3.7.8 Online safety: ensure the school assigns appropriate roles and responsibilities to manage the filtering and monitoring of internet and network use, reviewing such provision annually. Ensure that cyber security for the school is robust, monitored and regularly tested.

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 2025, 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.

Sexual abuse may also include 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 online and remote contact).

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 It is recognised that it is more likely that girls will be victims and boys perpetrators, but all child on child abuse is unacceptable.

5.3.7 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.

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

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

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

5.3.11 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 Harrow Little Lions) 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 Harrow Little Lions. Mobile phones must not be used anywhere within Harrow Little Lions in the presence of children (unless in the case of emergency).
- 7.8 Only digital devices owned by the school should be used to take photos and / or videos of pupils and their learning.
- 7.9 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:
 - 8.1.1 The conduct of a member of staff;
 - 8.1.2 A child, parent or member of staff “disclosing” abuse;
 - 8.1.3 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 2025 '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 2025
- 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: Senior Deputy Head (Whole School)

Updated: Aug 2025

Review Date: September 2026

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

11 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.

12 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.

13 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

31 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.

32 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.

33 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

416 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.

42 Sexual Abuse (Both sexes)

421 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

422 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

43 Neglect

431 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

432 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

44 ***Psychological / Emotional Abuse***

441 Physical Indicators

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

442 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

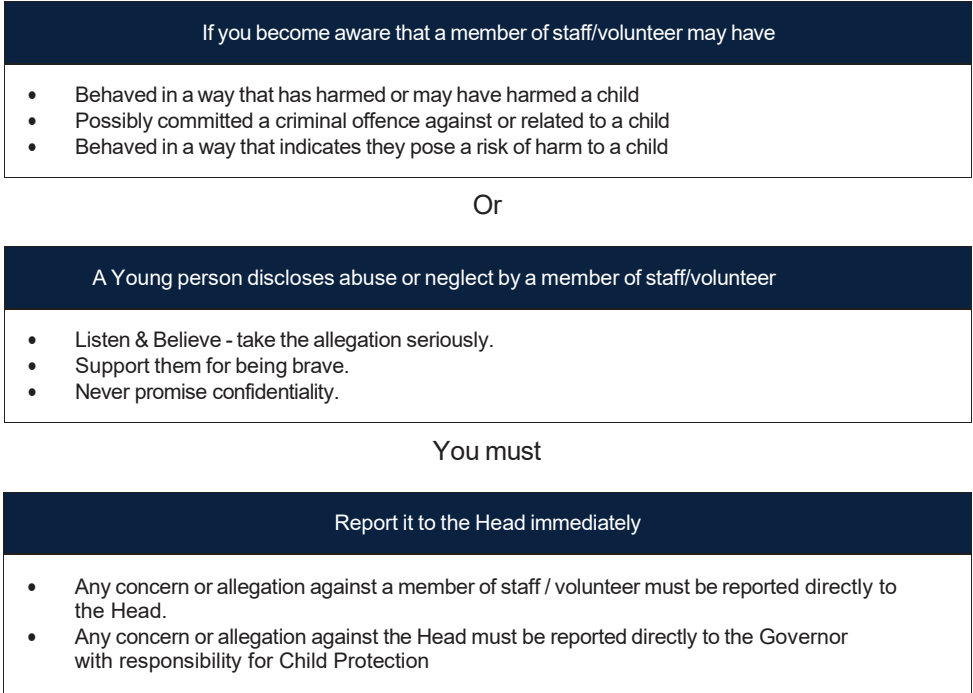
Report it

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?

- **Executive Designated Safeguarding Lead (Executive DSL):**
Ms **Rosie McColl** (Head) rmccoll@harrowschool.hk Mobile: 95414001
- **Designated Safeguarding Leads (DSLs):**
Upper School:
Ms **Laura Yandell** (Senior Deputy Head, Whole School) lyandell@harrowschool.hk
Lower School:
Mr **Brendan Shanahan** (Head of the Lower School) bshanahan@harrowschool.hk
- **Deputy DSLs (DDSLs):**
Mrs **Lauren Berner** (Deputy Head of Lower School, Pastoral, Co-Curricular and Organisation) lberner@harrowschool.hk
Ms **Kim Gration** (Assistant Head, Prep School, Pastoral and Wellbeing) kgration@harrowschool.hk
Ms **Naina Nightingale** (Assistant Head, Senior School, Pastoral and Wellbeing) nnightingale@harrowschool.hk
Mrs **Denise West** (Director of Human Resources) dwest@harrowschool.hk
Ms **Wylie Chan** (Upper School Office Manager and PA to US SLT) 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:**
Dr **Ahmed Hussain** ahussain@aisl-edu.com
- **School Psychologist:**
Dr **Rachel Gregory** rgregory@harrowschool.hk

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



The Head:
Ms **Rosie McColl** rmccoll@harrowschool.hk

The Governor with responsibility for Child Protection:

Dr **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 Executive Designated Safeguarding Lead	
Name & signature of Executive Designated Safeguarding Lead to confirm receipt	
Rosie McColl (Head) 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 2025 (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 ●●● TRAFFIC LIGHT TOOL

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

● 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

● 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 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.

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.

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 70015. Registered Charity in Scotland, number SC045766.

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
- absences 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
- taking 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.

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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HARROW
INTERNATIONAL
SCHOOL
HONG KONG

2025-26

兒童保護與保障政策
Educational Excellence for Life and Leadership



兒童保護及保障政策

內容

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1 簡介

1.1 哈羅香港致力於保障和促進學校所有學生的福祉。除兒童保護外，保障還包括其他問題，例如學生健康和 safety、反霸凌/網路霸凌、數碼安全（意即線上安全，如不當使用科技，包括人工智能）、醫療提供、以及酒精、藥物和物質濫用。有關這些領域的政策和指南應與本文件一起閱讀，特別是以下情況：

- HS19 AISL 保障政策
- 教職員兒童保護與維護行為準則
- 教職員的ICT可接受使用政策
- 數碼保障政策
- 學生ICT行為準則
- 教師和行政人員的專業指引
- 反欺凌和騷擾政策
- 學生行為政策
- HS22精神健康及輔導程序 (集團政策及學校程序)
- HS24約束及合理武力政策
- 低級別疑慮政策
- 舉報和保密報告政策
- 招聘及選擇政策及程序
- 校園進入及保安政策
- 學生缺席及監護政策
- 寄宿原則及實務聲明
- 健康及安全政策(包括急救及危機)

1.2 本兒童保護及保障政策，適用於學校的所有教職員、學生、外部承包商、志願者和學校訪客，他們必須確保始終遵守該政策。在所有實際或疑似虐待的情況下，必須通知指定保障負責人 (DSL)，並遵循學校的程序。指定保障負責人將就所有實際或疑似虐待個案通知校長。例外情況是，如是一名教員 / 志願者涉及問題，在此情況下，必須通知校長。如校長牽涉這些問題，則必須通知負責兒童保護的校董。必須強調的是，就任何有關兒童保護或保障的問題必須向相關人員報告。在1989年和2004年的英國《兒童法》中，兒童被定義為任何未滿18歲生日的人士，這是本學校採用的定義，儘管我們將會在本地法律許可我們照顧學生的情況採用此政策。

1.3 主要人員

- **指定保障負責人(DSL):**

Rosie McColl 女士(校長) rmccoll@harrowschool.hk; 手機: 95414001

- **副指定保障負責人 (DDSLs):**

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Lauren Berner女士 (小學部副校長(關懷、課外活動及組織))

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Naina Nightingale女士 (助理校長(高中學部, 關懷及健康))

nnightingale@harrowschool.hk

Wylie Chan女士 (中學部校務處經理及中學部資深領導團隊之個人助理)

wchan@harrowschool.hk

Ginny Wong女士 (小學部校務處經理及小學部校長之個人助理) gwong@harrowschool.hk

Denise West女士 (人事部總監)

dwest@harrowschool.hk

- **負責兒童保護之校董:**

Ahmed Hussain博士, ahussain@aisl-edu.com

- **學校心理學家:**

Rachel Gregory博士, rgregory@harrowschool.hk

- **學校輔導員:**

Wing Kong先生, wkong@harrowschool.hk

Jeffrey Man先生, jman@harrowschool.hk

- **獨立人士**

Rosheen Rodwell女士, independentlistener@harrowschool.hk

如指定保障負責人、副指定保障負責人或校長缺席, 所有教職員可直接轉介社會福利署或警方。

保護家庭及兒童服務課 (屯門) 社工: 2618 5614 / 2618 5710 / 9460 4046

社會福利署部門熱線: 2343 2255

青山警署: 3661 1668

2 兒童保障政策

2.1 正如1989年和2004年英國《兒童法》所規定，哈羅香港認識到其保護兒童的責任，並相信兒童福利的重要性是不可動搖的。雖然學校致力將風險降至最低，但亦充分意識到無法消除兒童保護的風險。

本政策適用於學校所有教職員、學生、外部承包商、志工及訪客，他們必須確保始終遵守本政策。學校的基本理念是：教職員工應始終以學生的最大利益為出發點，並積極主動地確保所有學生都能獲得最佳發展。

2.2 該政策具有五個主要元素：

2.2.1 建立一個積極的、支持性的、安全的環境，讓孩子們可以在當中學習和發展，同時營造一種學校風氣，讓所有學生都擁有獲重視的感覺。

2.2.2 確保我們檢查在校工作的所有教職員和志願者的合適性，以實行更安全的招聘程序。

2.2.3 通過課程內容，提高對兒童保護議題的認識，並裝備兒童掌握保護自身安全所需的技能。

2.2.4 制定和實施有關識別和報告虐待案件或疑似案件之程序。

2.2.5 根據所商定同意的兒童保護計劃，支援曾遭受虐待的學生。

2.3 學校認識到，由於日常會與兒童經常接觸，教職員較容易觀察到虐待的外在跡象。因此，哈羅香港將：

2.3.1 建立和維護一個讓兒童感到安全、獲鼓勵交談和獲傾聽的環境。

2.3.2 確保兒童知道，如他們有擔心事情的話，他們能夠找到學校內的成年人。

2.3.3 在正式和非正式課程中加入不同機會，讓兒童發展他們在識別和保護免受虐待所需的技能，包括識別和報告兒童之間的虐待、傷害的性行為和線上虐待。

2.3.4 遵循社會福利署制定的程序，並額外考慮NSPCC、DfE、英國國家最低標準與獨立學校督察團（英國海外學校）等在英國發布的所有指南，特別是《保障兒童在教育中的安全》（KCSIE 2025）；以及在全球實施的聯合國兒童權利公約（UNCRC）。

2.3.5 確保有一名指定保障負責人和副指定保障負責人，他們均已接受適合該角色的培訓和支援。保障負責人和副指定保障負責人，在每兩年須接受一次兒童保護培訓。

2.3.6 確保有一名指定校董負責兒童保護範疇。校董會對兒童保護政策、程序和履行相關職責的效率，須進行年度審查，包括改正不足或弱項。校董在保障方面有接受適當的培訓。

2.3.7 確保所有教職員及在學校有其角色崗位的志願者，始終遵循更安全的招聘做法，包括對教職員和志願者進行適當的預約前檢查，並在可能的情況下，對承包商和其他個別人士進行檢查。

2.3.8 確保每一位員工（包括臨時員工、供應商人員和志願者）及校董會均知道指定保障負責人是誰、他們的職責是什麼、如何聯絡他們，以及當他們不在時可以尋找誰。

2.3.9 確保所有教職員和志願者均得悉兒童保護之安排，了解他們在警惕虐待跡象方面之責任，以及他們將有任何疑慮轉交給指定保護負責人之責任。

- 2.3.10 通過定期的員工培訓，我們將在學生和教職員之間培養相互尊重的文化，而成年人亦應在這方面樹立良好榜樣。每年向所有長期教職員提供兒童保護的培訓。所有兼職和志願者均得悉兒童保護之安排。向有負責崗位的高年級學生，簡報何謂適當的行動。
- 2.3.11 如果收到兒童保護計劃的學生因不明原因缺勤超過一星期，即根據教育局指引，通知社會福利署
- 2.3.12 與香港相關機構建立有效聯繫，並因應需要配合他們對兒童保護事宜的查詢。
- 2.3.13 即使不需要立即提交該事件（例：低級別問題），亦會保留有關兒童問題的書面、註明日期和簽署（或電子）記錄。
- 2.3.14 確保所有兒童保護記錄都被安全保存在上鎖的位置或安全的電子位置中，並與主要學生檔案分開。只有指定高級教職員、指定教職員、照顧個別特定學生之教職員（指定保障負責人認為合適）才能訪問。在當地法律範圍內符合法規的情況下，記錄將盡快轉移到新學校(正常情況為5天內為最佳做法)。
- 2.3.15 遵循法定指導程序，並在對任何教職員、志願者或校長提出指控時，與當局密切合作；如對校長提出指控，將通知負責兒童保護的校董。良好做法需具備明確的調查記錄，並將指控的結果保存在機密的員工檔案中。
- 2.3.16 對學校組織的在學校場地以外進行的所有活動進行風險評估；這包括盡可能確保場外供應商對其將與學校學生有聯繫的員工進行適當檢查。
- 2.3.17 確保立即糾正兒童保護安排中的任何不足或弱項。
- 2.3.18 加強以下觀念即所有兒童，無論年齡、殘疾、性別、種族傳統、宗教信仰、性取向或身份如何(亦謂「受保障特徵」)，都有權獲得平等保護，免受各種類型的傷害或虐待。
- 2.3.19 請記住，有些兒童由於受以前經歷、他們的依賴程度、溝通需求、殘疾或其他個人需求（例：背景保護）所影響，而會更加脆弱。
- 2.3.20 確保所有教職員均知悉與寄宿學校相關的額外風險和責任，並接受適合其在寄宿學校角色的培訓。
- 2.3.21 確保學校的數位安全保障體系健全，包括使用適當的過濾和監控軟體（由教職員定期檢查），明確學生在網路安全方面的行為規範（包括人工智慧的使用），以及根據學生年齡和能力分級設定其使用數位工具的權限（包括學前班和寄宿制學生）。更多詳情請參閱學校的數位安全保障政策。
- 2.3.22 透過多種措施確保校園安全，例如安裝閉路電視監控系統、配備保安人員、設置圍欄、有效管控宿舍等重點區域以及危險區域，並加強對工作場所的監督管理、健康安全管理和風險管理，運用數據分析、定期評估和持續的維護工作，從而提升校園安全水平。
- 2.3.23 負責監督學校關於網路安全的政策和措施，並充分了解學校用於過濾和監控網路使用的系統。每年對相關措施進行評估，確保所有教職員都接受過適當的網路安全培訓，並了解學校在網路過濾和監控方面各自的職責和權限。
- 2.4 《兒童法》（1989年）和《保障兒童在教育中的安全》（2025年）中指出「兒童的身心健康之重要性是不可動搖的」。這意味著不應允許將可能適用於其他情況的保密考慮，凌駕於兒童免受傷害的權利之上。然而，在表達疑慮和正在調查時，應盡一切努力確保為所有相關人員保密。

- 2.5 我們認識到，遭受任何形式虐待的兒童可能會難以形成自我價值感。他們可能會感到無助、屈辱和某種責備感。對處於危險中的兒童而言，學校可能是其生活中唯一穩定、安全及可預測的因素。在校內，他們的行為可能具有挑戰性或性格內向。在這些情況下，我們將與支援他們的其他機構聯絡。我們亦將確保，如果收到兒童保護計劃的學生轉學，他們的資料會立即安全地轉移到新學校，並通知保護家庭及兒童服務課（FCPSU）。
- 2.6 哈羅香港的反欺凌和騷擾（包括網絡欺凌）政策必須與兒童保護及保障政策一起閱讀。任何嚴重的欺凌問題都將提交給指定保障負責人，並按照反欺凌和行為政策進行跟進。
- 2.7 所有兒童，不論年齡、身心障礙狀況、性別、種族、宗教信仰、性取向或性別認同為何，都有權獲得同等的保護，免受各種形式的虐待、忽視和剝削。所有工作人員都致力於保護兒童免受虐待，無論是在家中還是在其他場所。這包括確保兒童在網路環境中的安全，防止他們受到虛假資訊、誤導性資訊和陰謀論的侵害，以及防止因人工智慧被濫用而造成的傷害。

3. 角色和職責 (同時見於 HS19)

3.1 **指定保障負責人(DSL):**學校有一名指定保障負責人，負責處理有關兒童保護的任何事宜。

3.2 指定保障負責人的作用是：

- 3.2.1 認識如何識別虐待跡象，並知道何時聯繫社會福利署旗下保護家庭及兒童服務課 (FCPSU)，或虐兒案件調查組 (CAIU) ——以協助他們注意到兒童保護問題；
- 3.2.2 確保在轉介時具備適當的資訊，且轉介是在保密的情況下以書面形式確認的；
- 3.2.3 酌情與社會福利署和其他機構聯絡；
- 3.2.4 作為建議和專業知識的來源，並讓學校內的相關人員了解所採取的任何行動及需要採取的任何進一步行動；
- 3.2.5 確保妥善記錄任何轉介和採取的行動，並確保其安全性和保密性；
- 3.2.6 管理和提供教職員有關兒童保護培訓，並每年（與合適的指定校董一起）審查兒童保護政策的運作，以確保程序有效並符合當前的最佳做法。
- 3.2.7 對統一中央記錄進行定期檢查；
- 3.2.8 透過定期審查有關網路濫用或不當網路行為的報告來監控網路安全，並在必要時採取相應措施。學校應至少每年對網路過濾和監控系統進行一次評估；
- 3.2.9 透過課堂教學和課外活動（例如集會、網路安全宣傳日和數位素養能力培養活動等）來提升學生網路安全意識。
- 3.2.10 重要的是，指定保障負責人不能孤立地工作，因此，他們與來自學校各個部門且經過適當培訓的高級職員團隊會密切合作。
- 3.2.11 所有DSL和DDSL人員必須至少每兩年更新一次他們的3級訓練證書；
- 3.2.12 對於因涉嫌對兒童構成風險或傷害而被解僱或辭職的案件，應將相關資訊提交給英國「資訊揭露與禁入服務局」或其他相關的本地或國際機構。

3.3 **校長：在學生安全保護方面，校長的職責是：**

- 3.3.1 定期與指定保障負責人（DSL）會面，確保能及時發現並妥善應對兒童保護方面的風險。
- 3.3.2 與學校管理機構合作，確保學校的兒童保護政策和程序內容完善、符合最新標準，並包含以下內容：
 - 3.3.2.1 所有形式的虐待行為的定義
 - 3.3.2.2 虐待的跡象和表現特徵的相關訊息
- 3.3.3 如果工作人員或志工對兒童的情況有疑慮，他們應該採取什麼措施。
- 3.3.4 如果工作人員或志工對兒童的情況有疑慮，他們應該採取什麼措施。
- 3.3.5 閱讀並瞭解國家和地方關於預防和應對虐待行為的指導文件。

- 3.3.6 了解學校所在地區的最新情況，以及如何使學生安全保護政策和程序能滿足學校的特定需求。
- 3.3.7 確保所有教職員和志願者定期接受兒童保護的培訓。
- 3.3.8 為遭受虐待的兒童建立支持系統，例如安排學校心理諮商或聯絡外部支持服務機構。
- 3.3.9 確保學校的整體氣氛、課堂教學和集會活動都能積極促進學生之間建立健康的人際關係。
- 3.3.10 確保孩子們知道，如果遇到問題，可以隨時去找任何工作人員或志願者尋求協助，並且他們會認真傾聽並給予重視。
- 3.3.11 確保學校廣泛宣傳各種求助管道，讓孩子知道，如果他們不方便與可信賴的成年人溝通，可以去哪裡尋求幫助。
- 3.3.12 提供家長有關虐待兒童問題的相關信息，包括學校為預防虐待兒童以及為受虐待兒童提供幫助所採取的措施。
- 3.3.13 確保學校場地安全，並制定相關政策和程序，以規範訪客入校流程以及確保接送學生的安全。
- 3.3.14 確保學校組織的校外活動和各類活動制定了相應的學生安全保護和兒童保護政策及程序，並已完成相應的風險評估。
- 3.3.15 在招募學校新教職員和志願者時，校長和學校管理委員會必須遵循安全招募原則。他們必須確保對所有員工和志工進行必要的背景調查，並確保學校的記錄資訊保持最新狀態。
- 3.3.16 校長和校董會成員應支持指定保障負責人進行兒童保護轉介工作，並確保其本人及其助理有足夠的時間和資源來履行職責。如果學校認為有兒童面臨嚴重危險，但未獲得適當的幫助，校長和校董會成員應質疑相關決定。
- 3.3.17 協助指定保障負責人向家長通報狀況（除非有理由相信這樣做會使孩子面臨更大的危險）。
- 3.3.18 定期檢視所有與兒童保護相關的政策和程序。
- 3.3.19 根據兒童保護事件中學到的經驗教訓，更新兒童保護政策和程序。
- 3.3.20 如果有關於學校教職員或志工虐待行為的指控或疑慮，學校校長和校董會應根據情況與地方政府部門聯繫。
- 3.3.21 負責兒童保護事務的專員應至少每年向學校領導和校董會提交一份兒童保護工作報告。

3.4 所有教職員的責任

保護兒童免受傷害是所有教職員不可推卸的個人和專業責任。

教職員有責任向指定保障負責人（如其不在，則向副指定保障負責人）報告所有懷疑的虐待行為，然後由他們通知校長。校長或指定保障負責人，將通知負責兒童保護的校董。如指控涉及此處提到的任何人，該教職員應向其他指定人員之一作報告。如指控涉及指定保障負責人，則必須通知校長。如校長缺席，則應將其傳遞給指定校董，如指控與校長有關，也必須通知校董。

學校要求所有部門會議都必須將學生安全、健康和福利問題作為議程的首要內容，以促進學校的「安全文化」建設。

3.5 治理與監督

3.5.1 學校每年至少接受HISL（哈羅國際學校有限公司）和AISL（亞洲國際學校有限公司）的定期監督評估，評估內容包括學生保護措施的審查。

3.5.2 學校應每年對自身學生保護程序進行內部審計（並向校董會提交審計報告），每兩年進行一次外部審計。

3.5.3 學校的指定保障負責人和副負責人應加入AISL哈羅學校學生保護網絡，該網絡提供最新的資訊交流和最佳實踐分享平台。

3.5.4 校董會負責學生保護的成員應定期與學生保護負責人會面溝通。

3.5.5 所有校董在就任前均需接受適當的學生保護和兒童保護訓練（包括線上訓練）。培訓旨在使他們掌握相關知識，能夠從策略層面評估學校的學生保護政策和程序是否有效，並確保學校能夠全面有效地實施學生保護工作。校董的培訓應定期更新。

3.5.6 校董應了解《1998年人權法》、《2010年平等法》以及當地多部門學生保護機制的相關規定。

3.5.7 校董應確保學校建立適當的篩選和監控機制，並定期評估其成效。此外，校董也應確保學校領導團隊和相關人員了解並掌握相關規定，能夠有效執行相關工作，並在發現問題時及時回報。

3.6 舉報和保密報告政策

3.6.1 如教職員或志願者提出他們坦誠的擔憂，他們將不會有任何形式的受害風險，且不會因而受到歧視或處於不利地位。更多詳細資料，可參見於《舉報和保密報告政策》。

3.6.2 專業人士應保護其在履行職責過程中，所獲得的客戶其個人資料的保密性，根據香港人權法案第14條、個人資料（私隱）條例、普通法和職業道德規範，故此，私隱在法律和道德上均應受到保護。然而，在特殊情況下可視情況而定，當有必要披露信息以防止對兒童造成可預見的傷害時，披露可能是合理的。

3.7 校董會的角色 (BOG)

校董會對學生安全保障的政策和程序負有整體的責任。校董會負責審查學生安全保障的政策和實務。校董會高度重視職責，致力於維護學生福祉，保障學生安全，並確保學生免受傷害。為此，校董會將確保以下事項得以落實：

3.7.1 學校已製定並實施有效的、符合最新標準的學生安全保護政策，並將其提供給所有教職員，同時發佈在學校網站上。

3.7.2 學校已製定並執行適當的政策和程序。

- 3.7.3 招聘前所需的所有審核工作均已按時完成，並已在統一的中央登記冊中正確記錄。
- 3.7.4 所有教職員均已接受與此政策相關的學生安全保護訓練。
- 3.7.5 學校對學生進行安全教育，包括網路安全教育。
- 3.7.6 學校已設置適當的網路過濾和監控系統，以確保學生網路安全。
- 3.7.7 學校確保與相關機構和人員之間進行必要的溝通與資訊分享。
- 3.7.8 網路安全：學校應明確負責網路使用過濾和監控的崗位職責，並每年對此進行評估。確保學校的網路安全系統穩定可靠，並定期進行監控和測試。

4 虐待兒童

4.1 所有學校工作人員都應警惕學生可能遭受虐待的跡象，始終保持開放的心態，認識到“虐待行為可能發生在我們的學校”，並在發現任何可疑情況時立即報告。與負責兒童保護事務的老師或其助理人員溝通時，不妨先說「這可能沒什麼，但…」這樣的話，可以幫助教職員克服報告問題的心理障礙。

4.2 學校所有教職員均應警惕可能存在的虐待學生的跡象。虐待可能有多種形式，且它們之間並不相互排斥。同樣重要的是，要記住虐待行為不僅可能發生在現實生活中，也可能發生在網路上：

4.2.1 **身體虐待**可能包括擊打、搖晃、拋擲、中毒、燒傷或燙傷、溺水、窒息，或以其他對兒童造成身體傷害之方式。當父母或照顧者捏造或故意誘發兒童生病，也可能構成身體傷害。\\

4.2.2 情緒虐待更難察覺，可能是由於向兒童傳達他們一文不值，或戲弄、羞辱、否認愛和感情、興趣或友誼。它可能包括強加給兒童發育不當的期望，即超出兒童發育能力、或過度保護的互動，以及限制其探索和學習機會。

情緒虐待可能包括看到或聽到他人的虐待、欺凌（包括網絡欺凌）以及對兒童的剝削或腐敗。某種程度的情緒虐待會涉及所有類型的兒童虐待，但它亦可能會單獨發生。

4.2.3 **性虐待**涉及強迫或引誘兒童或青少年參與性活動，不一定涉及高度暴力，亦不論兒童是否意識到正在發生的事情。這些活動可能涉及身體接觸或非接觸活動，例如讓兒童觀看或製作性圖像、觀看性活動、鼓勵兒童以不恰當的性行為方式行事，或為兒童打扮以準備性行為等等濫用行為（包括通過互聯網）。一個常見誤解是成年男性為性虐待的唯一肇事者；與其他兒童一樣，婦女也可能犯下性虐待行為。根據英國政府《確保兒童在教育中的安全》（2022年），學校應對性暴力和性騷擾採取零容忍態度。任何此類事件均將按照學校的《反欺凌和行為政策》進行追究。

性虐待可能涉及身體接觸或非接觸活動，例如讓兒童觀看或製作性圖像、觀看性活動、鼓勵兒童以不恰當的性行為方式行事，或為兒童打扮以準備性行為等等濫用行為（包括線上及遙距接觸）。

4.2.4 英國政府對兒童性剝削的法定定義是：

「兒童性剝削是兒童性虐待的一種形式。它指的是個人或團體利用權力不平等地位，強迫、操縱或欺騙18歲以下兒童或青少年從事性活動，目的在於：（a）以滿足受害者需求或慾望為交換；和/或（b）為施暴者或參與者謀取經濟利益或提升社會地位。即使受害者表面上同意進行性活動，也可能構成兒童性行為。」

4.2.5 **疏忽照顧**是持續未能滿足兒童的基本生理和 / 或心理需求，例如提供足夠的食物、衣服和住所（包括被排除在家中或被遺棄）、保護免受身體和情緒傷害或危險、獲充分監督（包括使用不適當的照顧者），以及獲得適當的醫療保健或治療。

還會有其他情況，但不構成虐待，但這會引起對學生福利的嚴重關注。有關青少年處於道德危險、無人照顧、從事反社會或不當行為等問題，可能會被轉介給指定保障負責人，他將與校長討論此事，並在必要時與社會福利署討論。此類個案亦可轉介至學校保健中心。在每個個案中，必須通知學校指定保障負責人。

5 程序

5.1 父母或照顧者可能構成虐待之案例

5.1.1 如懷疑或知曉之虐待行為，必須報告給指定保障負責人或其副手，他們將在「需要知道」的基礎上與校長，及可能與學生相關的社際工作人員分享此類資料。

5.1.2 任何收到學生報告有關虐待的成年人，均有責任傾聽學生的意見，並提供保證，且隨後記錄學生的陳述。他們不得壓迫學生、提出探究性問題或建議答案。然後，他們應報告這種情況，並與指定保障負責人討論，後者將與校長協商。在所有階段中，均必須參考學校的《兒童保護程序》。

5.1.3 同時，可能需要迅速安排進行專家醫療診斷。指定保障負責人、其副手或校長，將與社會福利署協商後安排此項工作。

5.2 教職員或志願者可能構成虐待之案例

5.2.1 如指控一名教職員或志願者有以下行為，則應遵循如下所述的指控管理程序（另見附件 A）：

- i) 以可能傷害兒童的方式行事；
- ii) 可能犯下針對兒童或與兒童有關的刑事犯罪；或
- iii) 以顯示他們不適合與兒童共處的方式對待兒童，或兒童之行為顯示他們不適合與其共處

5.2.2 如對教職員或志願者提出指控，則必須予以回應；且顯然需要立即並謹慎行事。為所有相關方的利益，迅速解決指控必須是一個明確的優先事項。必須告知舉報人，此事將保密地轉交給適當人事跟進。須記緊此事應如此處理，並在同一天以書面記錄，接著傳遞給校長。如指控涉及校長，則必須將詳細資料傳遞給負責兒童保護的校董。

5.2.3 在負責兒童保護的校長或校董能夠與社會福利署商定指控或疑慮是否表明可能存在之虐待前，這些情況應受到嚴格保密。未經與社會福利署協商，學校將不會進行調查。所有指控必須在一個工作日內，提交給社會福利署。與社會福利署協商的可能結果是：

- i) 不應採取進一步行動
- ii) 已達到顯著的危害臨界值，應進行策略討論
- iii) 此事應交由警方 / 虐兒案件調查組 (CAIU) 進行刑事調查
- iv) 此事可能構成職業操守問題，涉事者所屬單位應對其進行紀律調查。

5.2.4 社會福利署將與學校討論該教職員在等待進一步調查時，是否可以繼續留校。是否實施停職 / 休假應由僱主自行決定，儘管只有在沒有合理選擇之情況下才應如此進行。如指控涉及社際教職員或其他住宿工作人員，則可能要安排遠離學校之住宿。如指控是針對一名教職員，而警方或虐兒案件調查組 (CAIU) 決定進一步處理此案時，

則須要求他們說明時間表是否合理。社會福利署也可在流程方面提供建議。這些決定很可能會由學校與學校的法律顧問和人力資源部共同作出。

i) 程序需要根據常識和判斷來運用

ii) 如指控被發現具有惡意，將從人事記錄中刪除

iii) 所有其他指控的記錄必須保存在員工檔案中，但任何未經證實、毫無根據或惡意的指控，均不會在僱主推薦信中提及。

5.2.5 更好的是學校能預測潛在風險，並設法防止所有合理誤解和虛假指控有關之風險。

適當的政策和程序，也可能會阻止任何試圖利用學校作為與學生建立不正當關係的基礎的個別人士；《哈羅香港兒童保護及保障的行為準則》和《教師和行政人員之專業指引》文件有助員工了解哪些行為通常被認為與其專業身份不符。然後，將根據需要對違規行為進行紀律處分。

5.2.6 許多教師擔心職業生涯可能會因兒童的脆弱或惡意指控而受到無法彌補的損害，這是可以理解的。實際上，這是極其罕見的。被發現提出惡意指控的學生可能會受到學校制裁，其中可能包括停學或永久開除。

5.3 學生可能遭受虐待之案例（兒童對兒童的虐待）同見於【兒童對兒童的虐待】

5.3.1 根據學校的《行為準則》，在調查期間，被指控虐待的學生可能會被停學。學校將聽取社會福利署關於調查此類指控的建議，並將採取任何適當的行動，以確保所有相關學生的安全和福利，當中包括任何被指控虐待的學生。如警方有必要就虐待指控，對學生進行面談，學校應將盡快收到通知，並確保在面談期間有適當的成年人支援學生。如有任何合理理由懷疑兒童正在遭受或可能遭受重大傷害，欺凌事件將被視為兒童保護之問題。

5.3.2 所有關於霸凌的指控和報告都應在CPOMS系統中記錄，兒童保護小組將評估該事件是否構成兒童虐待。如果有合理理由懷疑兒童正在遭受或可能遭受嚴重傷害，則該霸凌事件將被視為兒童保護問題。

5.3.3 學校的社會願景中聲明：「一個充滿關愛、相互尊重的社區，每個人都能在其中茁壯成長」，強調所有學生相互尊重的必要性，並且將透過課程去探討解決虐待兒童之問題。任何兒童對兒童虐待的事件都將記錄在適當的登記簿中，並且將根據學校的《行為準則》對相關模式進行調查。

5.3.4 我們體認到，強迫他人分享裸露或半裸露照片，以及利用此類照片勒索或控制他人，都可能構成兒童虐待行為，並造成嚴重傷害。因此，我們將採取適當的調查措施、進行相應的紀律處分，並為受害者提供必要的支持。

5.3.5 關於有害性行為，可參考布魯克「紅綠燈」評估工具（見附件）。

5.3.6 人們普遍認為，女孩更容易成為受害者，而男孩更容易成為施暴者，但無論如何，任何兒童對其他兒童的虐待行為都是不可接受的。

5.3.7 學校對學生之間發生的霸凌行為持「零容忍」態度，但每起案件都會根據具體情況進行評估，並充分考慮受害者的意願（如有必要，也考慮家長的意見）、其年齡以及任何特定的風

險因素（例如特殊教育需求或殘疾），並製定相應的支持方案。這可能包括安排學生接受學校或外部的心理諮商服務。

5.3.8後續措施應包括對施暴者進行相應的紀律處分和/或修復性措施，包括必要的停學處分。

5.3.9在調查案件期間，應進行風險評估，以防進一步的傷害發生。

5.3.10 學校體認到，特殊教育需求學生更容易成為霸凌的對象。

5.3.11 學校認識到，即使沒有通報的霸凌案件，也不表示霸凌行為沒有發生。因此，學校鼓勵師生保持警惕，一旦發現任何可疑跡象，應立即報告。

5.4 投訴和指控

5.4.1區分針對員工的投訴和指控是十分重要。指控是關於一名教職員對學生的行為方式，這可能對他們構成傷害。投訴是關於教職員運用學校政策的方式。

5.4.2任何涉及教職員或志願者涉及身體虐待、情緒虐待或性虐待，或對其疏忽照顧之可能性有關的問題，由此至終均將與香港社會福利署討論，並聽取他們的建議。

5.4.3若對住宿管理人員提出任何指控，學校將安排該工作人員暫時離開原住宿場所，直至調查結束。

6 涉及不當性行為的指控

- 6.1 如學生將涉及任何形式的不當性行為之事件告知教職員，無論是在學生之間，還是在教職員與學生之間，均應採取以下步驟：
 - 6.1.1 以同理心地傾聽，然後記下至《哈羅香港保障關注表格》或兒童保護網上管理系統(CPOMS)上披露的內容（參見附件 11）。
 - 6.1.2 立即聯繫指定保障負責人，他們將與校長討論，並因應情況與社會福利署討論，以確定是否需要進行轉介。
 - 6.1.3 一旦他們收到通知並同意由學校單獨跟進該問題，指定保障負責人（或其副手、學校心理學家顧問）將與投訴人面談，並儘快向負責監督研訊的紀律方面的校長報告。
 - 6.1.4 如社會福利署尋求進一步調查，他們會自行展開調查。這通常會涉及警察、指定保障負責人、學校心理學家和校長。在這種情況下，學校的紀律調查將會暫停，直到社會福利署批准為止。
- 6.2 由於個案可能牽涉濫用信任，無論投訴人是16歲以上還16歲以下，均應實施該政策。指定保障負責人應盡快通知家長，並轉介至社會福利署，除非這樣進行會使學生面臨更大的傷害風險。如有任何疑問，指定保障負責人會事先諮詢警方和社會福利署。

7 員工行為準則

- 7.1 師生之間的友好關係是一所快樂和生機滿載的寄宿學校之核心。與此同時，為了各方利益，在任何場合均須遵守職業界限；它們在《哈羅香港兒童保護及保障行為準則》和員工手冊中的《教師和行政人員專業指引》中有所概述。
- 7.2 師生之間的友好關係是一所快樂和生機滿載的寄宿學校之核心。與此同時，為了各方利益，在任何場合均須遵守職業界限；它們在《哈羅香港兒童保護及保障行為準則》和員工手冊中的《教師和行政人員專業指引》中有所概述。
- 7.3 教師絕不應該以可能被解釋為具有性暗示或可能被解釋為身體攻擊的方式，與學生說話或觸摸身體。其行動和意圖兩者，在往後可能會引起問題。
- 7.4 應謹慎對待教職員與學生（尤其是那些可能更脆弱的學生）之間的一對一會面。如有疑問，建議讓他人到場，或讓他人知道會面正在進行或通知其直屬經理，並記錄會面的原因和情況，打開著門，坐在桌子後面，並使用具有玻璃牆之教室等措施。
- 7.5 在進行體育指導或音樂教學時，應特別小心，因為可能需要與學生進行身體接觸以證明正確的定位，或進行一對一教學。如有疑問，請聯繫指定保障負責人尋求指引。各部門負責人將就適當的和針對特定主題的行為和準則，向其部門的工作人員提供額外的培訓和指導。
- 7.6 就其性質而言，在寄宿學校工作，讓教職員有機會在「宛若在家」的環境中，與學生建立密切關係並為他們提供支持。雖然這對教職員和學生具有很多益處，但在寄宿環境中工作也存在一定風險，教職員應格外警惕，避免將自己置於脆弱的境地，或可能被誤解的境地之中。社監將就適當的和特定於寄宿的行為和舉止，向其宿舍的教職員提供額外培訓和指引。如有疑問，請聯繫指定保障負責人或輔導組資深領導者尋求指引。
- 7.7 教職員和學生之間的任何電子通信均應非常謹慎，並應始終遵守學校《有關教職員的ICT可接受使用政策》。良好的做法包括重視和尊重兒童作為個體，且擔當適當成人的行為榜樣，應由始至終一直排除欺凌、叫喊、種族主義或性別歧視。教職員不應向學生發送私人電子郵件，任何發給學生的電子郵件在語氣和內容上均應保持專業。教職員可以通過 LinkedIn 等專業網絡平台聯繫本校校友，但在學生讀畢大學前，教職員不應通過 Facebook 等社交媒體與他們聯繫。
- 7.8 拍攝學生及學生學習狀況的照片或視頻，只能使用學校擁有的電子設備。有關良好做法的更多建議，請參閱：英國政府指引《在教育環境中與兒童和青少年一起工作的成年人的安全工作實踐》。

8 報告問題的程序

8.1 教職員可能會通過多種方式提出懷疑或疑慮，其中最有可能的是：

8.1.1 教職員的行為準則；

8.1.2 「披露」虐待行為的兒童、父母或教職員；

8.1.3 瘀傷或身體受傷的跡象，它們可能一同出現，亦可能個別出現；

8.2 如教職員有此類顧慮，應立即使用《哈羅香港保障關注表格》或兒童保護網上管理系統(CPOMS)向指定保障負責人報告，並在 24小時內應獲得書面形式確認。

8.3 延遲處理可能會損害兒童的福利。如問題與教職員的行為有關，也應直接向校長報告；且顯然需要立即並謹慎行事。

8.4 指定保障負責人 / 校長將考慮該報告，並立即（應在24小時內）將其轉交給相關政府部門，或者在採取適當的建議（可能包括在保密的基礎上，與社會福利署或警察）決定不將疑慮提交給當局，但保留對疑慮的完整記錄。

9 如兒童披露的話，該怎麼辦

9.1 如你在兒童或青少年進行披露時捲入潛在的兒童保護情況中，以下資訊旨在為你提供幫助。**請注意，這與因紀律問題而對學生進行面談，兩者完全不同的程序。**

- 9.1.1 聆聽，讓學生完成而不直接提問或阻止他們。讓他們告訴你他們想要甚麼，僅此而已。他們可能需要稍後向專家披露，現在過多的細節可能會干擾往後的調查。
- 9.1.2 面談結束後，確保學生感到安全，並解釋你接下來要做甚麼。
- 9.1.3 寫下筆記，包括面談的日期和時間，並在筆記上簽署。然後儘快（最好是立即）用學生自己的話在《哈羅香港保障關注表格》或兒童保護網上管理系統(CPOMS) 上記錄盡可能所有的內容。
- 9.1.4 保持冷靜，並通過言語和行動傳達此點；向學生保證你會認真對待他們所說的話。
- 9.1.5 在同一工作日向指定保障負責人報告並提供事件的書面記錄（在《哈羅香港保障關注表格》或兒童保護網上管理系統(CPOMS) 上）。

9.2 保密

- 9.2.1 在兒童保護有關的所有問題上，保密管理是一個非常重要的元素。
- 9.2.2 教職員不應該向學生或成人提供絕對保密的保證，但必須確保資訊只透露給需要知道的人。從一開始，確保這一點就很清楚，而不是最後才突然出現在學生身上。
- 9.2.3 應該向兒童和青少年解釋，如果保守秘密意味著他們或其他人可能會繼續受到傷害，那麼就不能也不應該保守秘密。

9.3 披露之後

- **保持冷靜**
盡量不要通過口頭或肢體語言重，將你的憤怒、震驚、痛苦或尷尬傳遞給兒童。
- **表現得像你相信兒童一樣**
- **讓兒童感到安心**
這不是他們的過錯；很慶幸他們有告訴你等等
- **讓兒童說話 / 講畢其經歷**
不要質疑兒童
- **立即將事件報告給指定保障負責人 (DSL)，或者在他們不在的情況下，向副保障負責人 (DDSL) 或校長報告，並轉達你所做的筆記。**
- **向兒童解釋，你可能需要與另一個機構的工作人員交談，他們的工作是幫助和保護兒童，他們可能會想與兒童交談，但你願意與兒童待在一起並在可能發生的情況下支援他們。**

- **確認孩子安全無恙，並且可以回到教室或參加活動。**如果孩子情緒過於激動，無法繼續上課或參加活動，則應將其帶到學校醫務室。也可以請學校輔導老師前來協處理。

9.4 及早協助

- 9.4.1 人們普遍認為，儘早為處於危險境地中的兒童提供支持至關重要。英國兒童保護協會（NSPCC）指出：「及時提供支持至關重要。儘早識別並滿足兒童或家庭的需求，可以增強對兒童福祉有益的保護因素，並減少可能對兒童生活造成負面影響的風險因素。研究表明，及早提供幫助和乾預措施可以保護兒童免受傷害，減少需要轉介至兒童保護機構的情況，改善兒童的長期發展提供幫助和乾預措施可以保護兒童免受傷害，減少需要轉介至兒童保護機構的情況，改善兒童的長期發展前景，幫助兒童的生活能力為
- 9.4.2 哈羅香港學校擁有完善的輔導團隊，由學校心理師領導。學校可提供早期介入服務，參與者包括學校心理師、保健中心護理師、學校輔導員、青少年心理健康工作者、助理心理師。
- 9.4.3 學校的支援系統能夠及時有效地介入，並與學生保護專員/助理學生保護專員、學生及其家庭合作，根據個案情況為學生提供最合適的後續支援。
- 9.4.4 學校定期提醒教職員工，一旦發現學生有任何問題，應立即採取行動。

10 轉介過程

- 10.1 如果按照本文件中概述的程序，懷疑虐待兒童，指定保護負責人或其他指定人員將聯繫社會福利署的相關辦公室。
- 10.2 如有涉嫌性虐待之個案，且受害人是17歲以下的兒童，或者在嚴重的身體虐待案件中，受害人是14歲以下的兒童，警方的虐兒案件調查組 (CAIU) 將負責調查這些指控。指定保障負責人可以直接或通過保護家庭及兒童服務課 (FCPSU) 聯繫虐兒案件調查組 (CAIU)。
- 10.3 如已進行轉介，則應向該機構提供以下資訊：
- 引起關注的直接原因，和任何直接的危險
 - 兒童的全名、出生日期、地址、身份證號碼，及其殘疾或特殊需要
 - 兒童的行踪
 - 父母或照顧者的姓名、香港身份證號碼，以及其他家庭成員的詳細資訊，例如兄弟姐妹。
 - 家庭醫生的姓名
 - 學校名稱
 - 聯絡人的姓名、職銜及電話
 - 其他證人和其他機構的姓名
 - 你可能擁有的任何其他相關資訊
 - 重要的是請謹記，如案件發展至法庭訴訟程序，提交的文件可能會成為證據的一部分。

聯絡方式：

屯門保護家庭及兒童服務課 (FCPSU) 社工主任： **2618 5614 / 2618 5710 / 9460 4046**

社會福利署的部門熱線： **2343 2255**

11 更安全的招聘

- 11.1 在學校僱員入職前，所有教職員都將進行適當檢查，以確保沒有任何人士具備不應與兒童一起工作之理由。這些招聘檢查將基於英國2024年9月的《保障兒童在教育中的安全》指引和英國內政部的《外國國民犯罪資訊查詢的申請流程》（A-F、G-P 和 Q-Z）中的指引。此外，這亦已參閱了香港教育局通函第65/2010號《加強保障學童的措施：學校人事聘用事宜》及教育局通函第180/2011號（提供非正規課程的私立學校採用性罪行定罪紀錄查核機制）。所有檢查結果必須在就業開始前，提交給人力資源部門進行檢查（如果因物流問題無法做到此點，則應盡快提交給人力資源部門）。

學校招聘程序的全部詳細資訊，可以在《招聘和遴選政策》中找到

- 11.2 志願者、家長幫手和校外活動提供者則另有具體的入校和檢查程序，可在《志願者政策》中找到。

12 參考

12.1 本政策是根據旨在保護香港和世界各地兒童的法律和指引而制定的。具體來說：

- 聯合國《兒童權利公約》(UNCRC)，由聯合國於1989年通過（第44/25號決議）。該公約承認並保護兒童的基本自由和固有權利，並於1994年起適用於香港。
- 《保障兒童在教育中的安全》（2025年）
- 1989年和2004年英國《兒童法》
- 英國海外學校標準 (DFE 2023)
- 共同努力保護兒童（英國政府 2023）
- 英國兒童保護協會（NSPCC）
- 《保護兒童免受虐待— 多專業合作程序指引》（2020 年修訂）

持有者：資深副校長(全校)

更新日期：2025年8月

審核日期：2026年9月

13 附件

附件A - 指控管理

附件B - 該與誰交談？擔憂和投訴

附件C - 虐待的定義和潛在指標

附件D - 兒童保護與保障：披露與報告流程圖

附件E - 兒童保護：牽涉教職員 / 志願者指控的流程圖

附件F- 哈羅香港保障關注表格

附件G - 兒童保護與保障 - 教職員行為準則

附件H - 布魯克「紅綠燈」工具：用於辨識有害性行為

附件A：指控管理

1. 當指控教職員或志願者有以下行為時，應遵循指控管理程序：

- 以傷害或可能傷害兒童的方式行事
- 可能犯下針對兒童或與兒童有關的刑事犯罪；或
- 以顯示他們可能對兒童構成傷害風險的方式對待兒童。

2. 學校所有教職員均應立即向校長報告此類指控。(如校長缺席，則為負責兒童保護的校董)唯一例外是如果指控涉及校長，在這種情況下，應該向負責兒童保護的校董報告。

3. 在得知符合準則的指控後，負責兒童保護的指定保障負責人、校長或校董應在一個工作日內，聯繫社會福利署。社會福利署聲明「初步調查的目的是收集和分析信息.....決定是否有理由相信兒童已經或正在被虐待.....確定未來是否存在虐待風險或可能性。社會查詢 / 調查的結果將構成兒童福利計劃的基礎」。

4. 所有與指控相關的討論內容都應妥善記錄並保密。

5. 在屯門區的話，可聯絡保護家庭及兒童服務課（FCPSU）的社工主任：2618 5710 或 9460 4046。

青山警署的電話則為T 3661 1668。

6. 如果有人舉報某個組織或個人在非上課時間（例如暑期夏令營、週末補習班）使用學校場地，學校校長、指定保障負責人或學生保護委員會成員將聯繫社會福利署以及該組織的管理人員（前提是該組織並非被舉報的對象）。

附件B: 該與誰交談?

對學校或家中生活有擔憂和關注是很正常的，例如：

- 感覺無法應付你的事務或其他活動。
- 掙扎於與其他學生之間的友誼或關係。
- 擔心其他人（學生、教職員或校外人員）不友善、不尊重或辱罵他人。
- 擔心因種族、宗教或其他原因而受到與他人不同的對待。

一個人生活上的不愉快可能由於他人的故意行為，但也可能由於他人粗心的行為而造成。欺凌類型的行為是指任何被認為是故意或反覆侮辱、羞辱、恐嚇或傷害他人的行為；哈羅香港不會容忍這種行為。

如這些問題中的任何一樣導致學生擔心或不愉快，抑或如果任何學生意識到校園社群中的其他人感到不愉快，如是者，與可信任的人交談是必不可少的。學生把事情藏在心裡，最終只會感到更不愉快，而且亦會讓最初的問題變得越來越嚴重。任何學生都不應該覺得沒有人在乎自己。

有很多潛在的人士可以提供幫助：

- 父母或監護人
- 家庭的其他成員
- 指導者、導師或同伴
- 好友
- 社監
- 社輔導團隊中的任何成員
- 任何教師
- 學校或社領袖生
- 學生健康大使
- 校監
- 學校保健中心內的職員 (2299 6215)
- 學校心理學家或輔導員
- 資深領導團隊成員

此外，還有一些在香港可以聯絡的外部機構：

- 社會福利署 (2343 2255)
- 香港撒瑪利亞防止自殺會 - 24 小時情緒支援 (2389 2222)

附件C：虐待的定義和潛在指標

1. 了解有關虐待兒童

- 11 從廣義而言，兒童虐待被定義為任何危害或損害18歲以下個人身心健康和發展的作為或不作為。這種行為是根據社群標準和專業知識的結合來作判斷的。它是由個人單獨或集體犯下的，施害者他們根據自己的特徵（例如年齡、地位、知識、組織形式）處於不同的權力地位，導致兒童容易受到傷害。虐待兒童不僅限於兒童父母 / 監護人情況，但包括任何受託照顧和控制兒童的人，例如保姆、親戚、老師等。對於兒童性虐待，該行為也可能由陌生人對兒童施行。虐待也可能由其他年輕人士實施（例如：兒童對兒童的虐待）
- 12 本《程序指引》對兒童虐待的定義，是為了方便相關專業或人員保障受虐兒童或有受虐風險的兒童的福利。這並不是一個法律定義。當需要檢控施虐者時，應參考現行的相關條例。還應注意的是，涉及兒童福利但未在本《程序指引》中定義為虐待兒童的案件也應謹慎處理，並應提供適當的服務以確保兒童的最佳利益。
- 13 在決定個案是否應被界定為兒童虐待時，負責的專業人士應根據個案的具體情況作出評估，並考慮各種因素（例如：兒童的年齡、行為、行為對兒童的後果）等，而不是僅僅關注已發生事件的頻率和性質。

1. 虐待兒童的類別虐：同見於本政策第4部分

3. 可能為虐待兒童的指標

- 31 在調查任何懷疑虐待兒童個案時，負責的專業人員應參考兒童、父母和家庭所表現出的指標。物理指標通常是很容易觀察到的指標，可能是輕微的，亦可能是嚴重的。兒童的行為有時可能是虐待兒童行為的線索。行為指標可以單獨存在，也可以與物理指標共同結合存在。它們可能很微小，也可能由兒童以圖像所陳述。父母的行為和態度、他們自己的生活經歷，甚至他們的家庭條件，也可以為虐待兒童的存在提供有價值的線索。
- 32 本章所列出的指標並非詳盡無遺。即使存在一個甚至多個指標，也不一定證明虐待兒童的存在。然而，如果一個指標重複出現、多個指標同時存在，或存在嚴重傷害，則應認真考慮虐待兒童的可能性。有關不同類別虐待兒童的行為指標可能會互換，應視乎情況而定。
- 33 這些指標僅對具備處理兒童和家庭的培訓和經驗之專業人員有用。它們有助專業人士進行評估，應謹慎使用。當中有些部分將比其他部分，與特定某些職業更有相關性。（例如：非醫療專業人員不應熟悉或試圖解釋本章中規定的不同形式之骨折或內傷）。

4. 識別可能是虐待兒童的清單

以下列表旨在幫助相關專業人士和各方，識別可能存在的虐待兒童問題，僅供參考。它並非詳盡無遺，應根據兒童的年齡適合性和他 / 她的能力，而予以適當考慮。(例如：受保障的特徵、特殊學習需要、傷健人士)

41 身體虐待

如對受傷的身體跡象其性質或嚴重程度有疑問，應盡快將有關兒童送醫。

4.11 瘀傷和傷痕

- 應根據發育年齡 (例如：兒童是否能夠行走)、瘀傷的數量、大小和分佈，以及它們是否顯示因直接撞擊物體、拳擊、抓握和/或叮咬而造成。
- 瘀傷為不太可能是意外而成的，例如：大面積的瘀傷、不尋常位置的瘀傷、不同時期所受到的多處瘀傷，或生殖器周圍的損傷均是可疑的。
- 咬痕是受傷的具體跡象。如及早發現，傷痕本身可能包含足夠的資訊來幫助識別施害者。
- 真皮黑色素細胞增生症 (蒙古斑) 是背部、臀部、脊柱底部、肩膀或其他身體部位的非癌性藍色或藍灰色斑點，會影響年幼的兒童，特別是亞洲兒童。斑紋可覆蓋背部大面積，多呈扁平狀，形狀不規則，邊緣不清晰，皮紋正常，寬大約2至8厘米或更大。真皮黑色素細胞增生症有時會被誤認為是瘀傷。這可能會引發有關可能虐待兒童的問題。重要的是要認識到真皮黑色素細胞增生症是胎記，而不是瘀傷。

4.12 撕裂傷和擦傷

- 手部、臂部或腳部的撕裂傷會損傷下面的肌腱，可能會導致殘障。
- 唇繫帶 (連接上唇和上牙齦中間的一塊組織) 的撕裂可能表明曾受強迫進食。

4.13 燒傷和燙傷

- 無意或有意造成的燒傷 / 燙傷可能難以區分。
- 一些曾遭受的燒傷可能呈現燒燙物體的形狀或圖案，例如加熱的碟盤、香煙。
- 「手套和 / 或長襪」的分佈表示四肢或臀部曾被浸入性 (浸泡) 燙傷。

4.14 骨折

- 這些應該被單獨解釋 / 處理。

4.15 內部受傷

- 腦 / 頭部受傷

可能是由於直接撞擊、搖晃或穿透傷害。

「搖晃嬰兒綜合症」是身體虐待兒童中最常見的死亡原因。

- 腹部受傷

內臟穿孔可能導致腹痛和嘔吐。

在沒有任何外傷跡象的情況下，可能會引致嚴重受傷甚至死亡。因此，如果不想漏診腹部損傷，則需要高度警覺。

4.16 其他

- 虛構或誘發的疾病，包括代理型孟喬森綜合症
- 下毒
- 因拉扯或火燒而脫髮
- 遇溺
- 嬰兒猝死

在正式驗屍官檢查完成之前，不應下結論。

42 性虐待（不論男女）

4.21 物理指標

- 內衣褲撕破、染污或染血
- 抱怨生殖器官部位痛楚、腫脹或痕癢
- 抱怨小便痛楚
- 外生殖器、陰道或肛門、口部或喉部瘀傷、流血或撕裂傷
- 陰道 / 陰莖有分泌物
- 性病
- 青春期懷孕

4.22 行為指標

- 食慾不振
- 對年幼兒童作出性利用行為
- 朋輩關係不佳
- 不願參加體育活動
- 行為問題（包括患上厭食症、過度肥胖、自殘、離家出走、自殺、性濫交、濫用藥物）
- 就該名兒童的年齡而言，其性知識和性行為異常豐富
- 學習成績顯著改變
- 睡眠不安
- 過度自瀆
- 對被觸碰反應過敏
- 極不喜歡在某處逗留或與某人一起
- 疏忽照顧

43 疏忽照顧

43.1 物理指標

- 營養不良、體重過輕或缺乏足夠質量的飲食
- 發育遲緩
- 嚴重的皮疹或其他皮膚問題
- 由不合適人士（例如年幼兒童）照顧兒童
- 長時間或參與危險活動時照顧不足
- 身體問題不獲理會，或醫療 / 牙科治療的需要不獲照顧
- 長期滿身污垢 / 衣衫襤褸
- 長期缺課，或被剝奪求學機會
- 家裡發現腐爛食物
- 居住環境欠整潔（例如滿布垃圾、排泄物和污垢等）
- 長期沒有人看管年幼兒童
- 完全遺棄或長時間遺棄兒童
- 把兒童禁錮家中

432 行為指標

- 經常表示饑餓或到處尋找食物，狼吞虎嚥或乞討，偷取食物
- 承擔與年齡不符的責任
- 癮癖
- 犯罪
- 投訴得不到足夠照顧、管教或培育
- 命令兒童過分長時間工作 / 擔當超出其體能的工
- 朋輩關係不佳
- 以單字回答問題
- 極度恐慌
- 因管教不足而出現性行為
- 不願回家
- 離家出走

44 心理/情感虐待

44.1 物理指標

- 不能健康成長
- 發育遲緩，例如：語言障礙
- 厭食症

44.2 行為指標

兒童方面的指標

- 疏離感
- 習慣紊亂
- 遺尿 / 便溺
- 學習障礙，例如：學業成績顯著變差
- 智力、情緒及社會方面發展遲緩
- 傷害自己或有自殺念頭 / 企圖
- 破壞行為或行為問題
- 睡眠不安
- 食慾不振
- 語言障礙

家庭方面的指標

- 排斥
- 終日責罵
- 侮辱性的批評
- 恐嚇
- 鼓勵偏差行為
- 奇怪的懲罰方式
- 以不當的家務方式作懲罰

5. 通常與虐待兒童相關之特徵

任何家庭都可能發生虐兒事件，而這些家庭的背景未必相同。現將虐兒個案的常見特徵載列如下，但僅作參考之用，不應當作發生虐兒事件的證據。另一方面，部分發生虐兒事件的家庭可能沒有任何下列特徵。

6. 家庭

- 家居凌亂不堪或異常整潔
- 被社會孤立
- 家庭出現危機或壓力，例如：懷孕、迫遷、離婚 / 遺棄 / 分居、婆媳糾紛
- 文化 / 迷信觀念
- 家庭暴力，例如：虐待配偶

7. 父母

71 個人經歷

童年被虐待的紀錄

- 童年不快樂或曾遭遺棄；嚴重缺乏身體 / 情緒照顧
- 曾經發生 / 經歷家庭暴力或其他暴力事件
- 曾經有嚴重的復發病症和 / 或精神病紀錄
- 酗酒 / 濫用藥物 / 沉迷賭博

72 態度和行為

- 對子女有固執或不合理的期望
- 堅信嚴厲的管教 / 體罰
- 對子女過分批評或冷漠
- 父母不成熟
- 自我形象低落

- 被動
- 父母雙方或其中一方智力較低
- 無法承受壓力
- 無法控制憤怒
- 家庭角色分散和混亂
- 性問題
- 子女的受傷原因令人難以信服或前後矛盾
- 沒有或延誤就醫
- 父母管教不當

8. 兒童

- 早產
- 不想生下的兒童
- 非婚生子女
- 有餵食或睡眠問題的嬰兒
- 不能健康成長的嬰兒
- 年幼時與父母分離
- 分娩時有困難
- 以南轅北轍方式教養的兒童，例如兒童並非在家中受教養
- 肢體傷殘或智障兒童
- 被指與家庭不幸有關的兒童
- 女性
- LGBTQ+
- 特別學習需要

9. 教職員也應該了解的其他形式的虐待行為包括：

- 兒童輟學問題
- 兒童性剝削
- 兒童犯罪利用
- 家庭暴力
- 以「維護榮譽」為名的暴力行為、女性生殖器切割、強迫婚姻和「燙乳」等陋習
- 極端主義思想的傳播
- 家庭成員被監禁的兒童

- 兒童遭受其他兒童的虐待
- 性暴力和性騷擾

這些可能表現為：

- 1. 兒童輟學：**兒童輟學可能是虐待或忽視的潛在跡象。工作人員和社區成員（包括父母和監護人）應將任何令人擔憂的學生缺勤情況（尤其是反覆或持續較長時間的缺勤）報告給兒童保護工作者或學校兒童保護聯絡員，以便及早發現虐待和忽視的風險，包括性虐待，並幫助預防兒童再次輟學的風險。
- 2. 兒童性剝削：**指利用兒童從事性活動，並以此獲取某種利益（例如食物、住所、毒品、酒精、禮物、金錢或情感滿足）的各種情況、環境和關係。性剝削的形式多種多樣，從看似「雙方自願」的關係到由犯罪集團實施的嚴重組織犯罪，不一而足。施害者總是對受害者擁有某種控制權，隨著性剝削關係的加深，這種控制權也會不斷增強。性剝削通常伴隨著不同程度的脅迫、恐嚇或誘騙，包括同儕施加的性行為壓力、網路霸凌以及其他形式的性虐待。需要注意的是，有些遭受性剝削的兒童可能不會表現出任何明顯的受虐跡象。
- 3. 女性生殖器切割術（FGM）：**指任何涉及部分或全部切除女性外生殖器，或對女性生殖器官造成其他傷害的行為。AISL在此問題上遵循英國的規定：對於任何18歲以下女性遭受女性生殖器切割術的報告，AISL均有義務將其上報相關部門。
- 4. 極端化：**指一個人逐漸支持恐怖主義和極端主義思想的過程。目前尚無任何可靠的方法能夠準確地識別那些容易受到極端主義思想影響的人。一些特定的個人背景因素可能導致人們更容易受到極端主義思想的影響，而這些因素往往會與家庭、朋友或網絡等方面的特定影響因素相互疊加，並與某些需求相吻合，而極端主義或恐怖組織似乎恰好能夠滿足這些需求。與管理其他安全風險一樣，工作人員應密切注意兒童行為上的任何變化，因為這些變化可能表明兒童需要幫助或保護。
- 5. 強迫婚姻/綁架：**在某些文化中，強迫婚姻仍然被認為是可接受的。任何工作人員如果認為有兒童可能面臨此類虐待的風險，應立即向兒童保護小組的成員報告。

附件D：兒童保護：披露和報告流程圖

你擔心兒童的安全 / 福利

注意虐待跡象並質疑異常行為或痕跡 / 損傷。

或

年輕人透露

聆聽並相信 - 認真對待指控。支持他們表現勇敢。告訴他們你接下來要做甚麼。永遠不要承諾保密。

你必須

報告它

填寫《哈羅香港保障關注表格》或轉介CPOMS作書面記錄。盡快將填妥的表格交給指定兒童保障人員。愈快愈好。

誰是兒童保護人員？

- **指定保障負責人總領導(Executive DSL):**

Rosie McColl 女士(校長) rmccoll@harrowschool.hk; 手機: 95414001

- **指定保障負責人 (DSL):**

中學部:

Laura Yandell 女士(資深副校長, 全校) lyandell@harrowschool.hk

小學部:

Brendan Shanahan先生 (小學部校長) bshanahan@harrowschool.hk

- **副指定保障負責人 (DDSLs):**

Lauren Berner女士 (小學部副校長(關懷、課外活動及組織))

lberner@harrowschool.hk

Kim Gration女士 (助理校長(初中學部, 關懷及健康))

kgration@harrowschool.hk

Naina Nightingale女士 (助理校長(高中學部, 關懷及健康))

nnightingale@harrowschool.hk

Wylie Chan女士 (中學部校務處經理及中學部資深領導團隊之個人助理)

wchan@harrowschool.hk

Ginny Wong女士 (小學部校務處經理及小學部校長之個人助理) gwong@harrowschool.hk

- **負責兒童保護之校董：**
Ahmed Hussain先生, ahussain@aisl-edu.com
- **學校心理學家：**
Rachel Gregory博士, rgregory@harrowschool.hk

附件E：兒童保護：針對教職員 / 志願者的指控流程圖

如果你意識到一名教職員 / 志願者可能有

- 以傷害或可能傷害兒童的方式行事
- 可能犯下針對兒童或與兒童有關的刑事犯罪；或
- 以顯示他們對兒童構成傷害風險的方式行事

或

一名年輕人披露了一名教職員 / 志願者的虐待或疏忽照顧

- 聆聽並相信 - 認真對待指控。
- 支持他們表現勇敢。
- 永遠不要承諾保密。

你必須

Report it to the Head immediately

- 任何針對教職員 / 志願者的擔憂或指控，均須直接向校長報告。
- 任何針對校長的擔憂或指控，均必須直接報告給負責兒童保護的校董。

校長：

Rosie McColl女士 rmccoll@harrowschool.hk

負責兒童保護之校董：

Ahmed Hussain博士 ahussain@harrowis.com

HARROW HONG KONG
SAFEGUARDING CONCERN FORM

附件F

學生全名及班級/社

年齡和出生日期

用兒童自己的說話，如實描述發生的事情、地點和在場人士。任何意見都必須詳細解釋。注意，不要提問引導性問題。

所採取的行動

報告此問題的教職員之姓名和簽署

職位

日期和時間

提供給指定總保障負責人的日期記錄表

指定總保障負責人的姓名和簽署，以確認收妥

Rosie McColl (校長)

簽署:

日期和時間

附件G：哈羅香港兒童保護及保障 - 教職員的行為準則

1. 哈羅香港致力於學生的安全和保護。本行為準則適用於學校的所有教職員、外部承包商、住客、志願者和訪客，以及以直接和 / 或無人監督的身份與學生互動之人員。
2. 本行為準則適用於代表哈羅香港行事的人員其公共和私人行為。我們必須始終認知，有關伴隨我們工作在其職業和私人生活中所承擔之責任。
3. 我們應認知，有關自己和其他人的脆弱性，尤其是單獨與學生一起工作時，並特別認知到我們有責任在此類互動中，保持身體、情緒和性方面的界線。我們必須避免與由自己為其負責的人士，發生任何隱蔽或公開的性行為。這包括利用、虐待或騷擾的言語或手勢，以及身體接觸。
4. 在接觸學生前，我們必須謹慎行事，並了解身體接觸可能被感知或接受的方式，以及這種接觸是否適當。
5. 哈羅香港的教職員和志願者在任何時候，均被禁止對兒童進行體罰。
6. 與學生的身體接觸可能會被對方和觀察者所誤解，只有在完全與性無關，並在其他方面均為適當的情況下才應該發生，且永遠不要私下進行。
7. 教職員必須將低程度問題向人力資源主管報告。
8. 與學生的一對一會面最好在公共場所進行；在可以（或正在）觀察互動的房間裡進行；或者在一個開著門或有玻璃牆的房間裡進行，而另一名教職員會收到其會面通知。教職員公寓不應招待學生。
9. 當有證據表明或有合理理由懷疑學生以任何方式受到虐待時，我們無論如何必須進行干預。如《哈羅香港兒童保護和保障政策》所述，必須向哈羅香港指定保障負責人報告涉嫌虐待或疏忽照顧的行為。
10. 在監督學生或以其他方式與學生一起工作時，任何員工或訪客均不得不適當地消費、使用酒精和 / 或藥物或受其影響。哈羅香港校園為禁煙區，無論在校外、監督學生或以其他方式與學生一起工作時，還是在校內的任何時候，均不得使用任何形式的煙草或電子煙。
11. 成人絕不應給學生任何不適當的藥物、（電子）香煙、圖像或閱讀材料。
12. 未經其直屬經理許可，並根據學校的禮品政策，員工和志願者不得接受學生的禮物。
13. 與學生的交流受《哈羅香港教職員 ICT 可接受使用政策》的約束：所有教職員均應熟悉其內容。
14. 如教職員發現學生可能對自己有所迷戀，必須立即通知他們的直屬經理。

在簽署本聲明時，本人承認已閱讀或獲悉《哈羅香港的兒童保護和保障政策》，並同意本人在哈羅香港的期間，本人絕不能：

- 擊打、物理襲擊或在身體或心理上虐待任何兒童；
- 亦從心理學角度而言，以某種方式對待任何兒童，致使可能對他們的發展產生負面影響，包括他們的社交和關係發展；
- 以給在場任何兒童樹立負面榜樣的方式行事；
- 與哈羅香港的任何現任學生（任何年齡）或任何未滿21歲的前哈羅學生進行性活動或發生性關係，無論成年年齡的定義或同意的法律認可方式如何在不同的國家有別——甚或相信兒童較自己他/她年長，事實上，以上均不能被認為是可以接受的辯護理由；
- 與兒童有任何可被視為利用、粗暴對待或虐待的關係；
- 以可能虐待兒童或使兒童面臨利用、粗暴對待或虐待風險的方式行事；
- 使用語言（線上 / 面對面），提出不恰當、冒犯性或辱罵性的建議或要約；
- 以不恰當或性挑逗的方式行事（線上、面對面或任何其他媒介）；
- 使用線上個人通訊（電子郵件、聊天平台、社交網絡等）與哈羅香港兒童建立或進行「持續」聯繫——只能使用組織所了解的專業線上工具和環境；
- 在任何與學校相關的活動中，與兒童睡在同一個密閉空間，例如同一個房間、帳篷或床上；
- 為兒童作出他們自己可以完成的個人性質之事情；
- 在您的上級經理不知情的情況下，向兒童提供金錢、物品或其他利益；
- 未經家長 / 管理層明確許可，或不在緊急情況下，用個人車輛接送學生。
- 縱容或參與兒童的非法、虐待或危及他們安全的行為；
- 以旨在羞辱、侮辱、輕視，或貶低兒童的方式行事，或以其他方式實施任何形式的情緒虐待；
- 歧視、區別對待或偏袒特定兒童而排斥其他兒童。

此列表並非詳盡無遺，或排除其他可能。基本原則是您必須避免可能對兒童不當或有潛在虐待行為的行為。

同樣重要的是，哈羅香港的所有教職員和相連群體在與兒童有任何接觸時：

- 快速識別可能使兒童處於危險之中的情況，並知道如何處理此類情況；
- 必須根據一般程序和本行為準則，報告對可能虐待兒童的任何疑慮、懷疑或確定性；
- 以在組織工作時和在工作場所中，盡量減少任何風險；
- 與兒童一起工作時，始終盡可能讓其他成年人看到；
- 確保教職員對待自己工作方式有其責任感，致使任何不當或可能導致虐待兒童的行為或行為，均不會被忽視或被容忍；

- 保持最高的個人和專業紀律和誠信；
- 尊重兒童的權利，以公平和誠實的方式對待兒童並給予尊嚴和尊重。

聲明

本人承諾嚴格遵守本《哈羅香港兒童保護與保障 - 行為準則》中的規則和準則，作為本人為哈羅香港的學生和教職員提供服務的條件。

此外：

- 本人會遵守哈羅香港的強制舉報規定，舉報涉嫌虐待兒童的行為。
- 本人將全力配合任何虐待學生的調查。
- 本人理解學校的社會願景聲明，並同意在本人與學校相關的所有來往中支持它：「一個充滿愛心、相互尊重的社群，讓每一個人均能茁壯成長。」
- 本人已閱讀並理解以下文件 / 政策：《教職員 ICT 可接受使用政策》、《教師和行政人員的專業指引》以及《反欺凌和騷擾政策》。
- 我聲明我沒有受到與兒童工作、性相關犯罪、不道德行為、虐待行為或任何其他不當行為有關的指控、調查、警告、定罪或任何其他行動，如果在我工作期間的任何時候發生變化，我將立即通知學校。
- 我了解，如果我涉嫌虐待行為並接受調查，調查期間我可能需要離開寄宿所居住。
- 本人確認本人已發布、閱讀並理解英國教育部2025年發布的《保障兒童在教育中的安全》之第一部分（如不需與兒童直接接觸的教職員，則為附件A）。
- 我曾出席或曾閱覽指定保障負責人在校內的最新匯報。

本人簽署確認本人已閱讀此《哈羅香港兒童保護與保障 - 行為準則》，並且作為工作上會與學生共處的人士，本人同意遵守這些標準。本人我明白，任何不符合本行為準則的行為或未能採取本行為準則規定的行動，均可能導致紀律處分，包括被哈羅香港解雇。

名字：_____ 職務 / 職位：_____

簽署：_____ 日期：_____

簽署後，應將此表交回給人力資源部，並將副本保存在員工人事檔案中



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

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

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 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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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.

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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
- absences 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
- taking 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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2025-26

儿童保护与保障政策



HARROW
INTERNATIONAL
SCHOOL
HONG KONG

Educational Excellence for Life and Leadership



儿童保护及保障政策

内容

1. 简介及主要人员
2. 儿童保护及保障政策
3. 角色及责任
4. 虐待儿童
5. 程序
6. 涉及不當性行為的指控
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10. 转介过程
11. 更安全的招聘
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1 简介

1.1 哈罗香港致力于保障和促进学校所有学生的福祉。除儿童保护外，保障还包括其他问题，例如学生健康和​​安全、反霸凌/网络霸凌、数码安全（意即线上安全，如不当使用科技，包括人工智能）、医疗提供、以及酒精、药物和物质滥用。有关这些领域的政策和指南应与本文件一起阅读，特别是以下情况：

- HS19 AISL 保障政策
- 教职员儿童保护与维护行为准则
- 教职员的ICT可接受使用政策
- 数码保障政策
- 学生ICT行为准则
- 教师和行政人员的专业指引
- 反欺凌和騷擾政策
- 学生行为政策
- HS22精神健康及辅导程序（集团政策及学校程序）
- HS24约束及合理武力政策
- 低级别疑虑政策
- 举报和保密报告政策
- 招聘及选择政策及程序
- 校园进入及保安政策
- 学生缺席及监护政策
- 寄宿原则及实务声明
- 健康及安全政策（包括急救及危机）

1.2 本儿童保护及保障政策，适用于学校的所有教职员、学生、外部承包商、志愿者和学校访客，他们必须确保始终遵守该政策。在所有实际或疑似虐待的情况下，必须通知指定保障负责人（DSL），并遵循学校的程序。指定保障负责人将就所有实际或疑似虐待个案通知校长。例外情况是，如是一名教员/志愿者涉及问题，在此情况下，必须通知校长。如校长牵涉这些问题，则必须通知负责儿童保护的校董。必须强调的是，就任何有关儿童保护或保障的问题必须向相关人员报告。在1989年和2004年的英国《儿童法》中，儿童被定义为任何未满18岁生日的人士，这是本学校采用的定义，尽管我们将会在本​​地法律许可我们照顾学生的情况采用此政策。

1.3 主要人员

- 指定保障负责人（DSL）：

Rosie McColl 女士（校長） rmccoll@harrowschool.hk; 手机：95414001

- **副指定保障负责人 (DDSLs) :**

Laura Yandell 女士 (資深副校長, 全校)

lyandell@harrowschool.hk

Brendan Shanahan先生 (小學部校長)

bshanahan@harrowschool.hk

Lauren Berner女士 (小学部副校长 (关怀、课外活动及组织))

lberner@harrowschool.hk

Kim Gration女士 (助理校长 (初中学部, 关怀及健康))

kgration@harrowschool.hk

Naina Nightingale女士 (助理校长 (高中学部, 关怀及健康))

nnightingale@harrowschool.hk

Wylie Chan女士 (中学部校务处经理及中学部资深领导团队之个人助理)

wchan@harrowschool.hk

Ginny Wong女士 (小學部校务处经理及小学校部校长之个人助理) gwong@harrowschool.hk

Denise West女士 (人事部总监)

dwest@harrowschool.hk

- **负责儿童保护之校董:**

Ahmed Hussain博士, ahussain@aisl-edu.com

- **学校心理学家:**

Rachel Gregory博士, rgregory@harrowschool.hk

- **学校辅导员:**

Wing Kong先生, wkong@harrowschool.hk

Jeffrey Man先生, jman@harrowschool.hk

- **独立人士**

Rosheen Rodwell女士, independentlistener@harrowschool.hk

如指定保障负责人、副指定保障负责人或校长缺席, 所有教职员可直接转介社会福利署或警方。

保护家庭及儿童服务课 (屯门) 社工: 2618 5614 / 2618 5710 / 9460 4046

社会福利署部门热线: 2343 2255

青山警署: 3661 1668

2 儿童保障政策

2.8 正如1989年和2004年英国《儿童法》所规定，哈罗香港认识到其保护儿童的责任，并相信儿童福利的重要性是不可动摇的。虽然学校致力将风险降至最低，但亦充分意识到无法消除儿童保护的风险。

本政策适用于学校所有教职员、学生、外部承包商、志工及访客，他们必须确保始终遵守本政策。学校的基本理念是：教职员工应始终以学生的最大利益为出发点，并积极主动地确保所有学生都能获得最佳发展。

2.9 该政策具有五个主要元素：

2.9.1 建立一个积极的、支持性的、安全的环境，让孩子们可以在当中学习和发展，同时营造一种学校风气，让所有学生都拥有获重视的感觉。

2.9.2 确保我们检查在校工作的所有教职员和志愿者的合适性，以实行更安全的招聘程序。

2.9.3 通过课程内容，提高对儿童保护议题的认识，并装备儿童掌握保护自身安全所需的技能。

2.9.4 制定和实施有关识别和报告虐待案件或疑似案件之程序。

2.9.5 根据所商定同意的儿童保护计划，支持曾遭受虐待的学生。

2.10 学校认识到，由于日常会与儿童经常接触，教职员较容易观察到虐待的外在迹象。因此，哈罗香港将：

2.10.1 建立和维护一个让儿童感到安全、获鼓励交谈和获倾听的环境。

2.10.2 确保儿童知道，如他们有担心事情的话，他们能够找到学校内的成年人。

2.10.3 在正式和非正式课程中加入不同机会，让儿童发展他们在识别和保护免受虐待所需的技能，包括识别和报告儿童之间的虐待、伤害的性行为 and 线上虐待。

2.10.4 遵循社会福利署制定的程序，并额外考虑NSPCC、DfE、英国国家最低标准与独立学校督察团（英国海外学校）等在英国发布的所有指南，特别是《保障儿童在教育中的安全》（KCSIE 2025）；以及在全球实施的联合国儿童权利公约（UNCRC）。

2.10.5 确保有一名指定保障负责人和副指定保障负责人，他们均已接受适合该角色的培训和支持。保障负责人和副指定保障负责人，在每两年须接受一次儿童保护培训。

2.10.6 确保有一名指定校董负责儿童保护范畴。校董会对儿童保护政策、程序和履行相关职责的效率，须进行年度审查，包括改正不足或弱项。校董在保障方面有接受适当的培训。

2.10.7 确保所有教职员及在学校有其角色岗位的志愿者，始终遵循更安全的招聘做法，包括对教职员和志愿者进行适当的预约前检查，并在可能的情况下，对承包商和其他个别人士进行检查。

2.10.8 确保每一位员工（包括临时员工、供应商人员和志愿者）及校董会均知道指定保障负责人是谁、他们的职责是什么、如何联络他们，以及当他们不在时可以寻找谁。

2.10.9 确保所有教职员和志愿者均得悉儿童保护之安排，了解他们在警惕虐待迹象方面之责任，

以及他们将有任何疑问转交给指定保护负责人之责任。

- 2.10.10 通过定期的员工培训，我们将在学生和教职员之间培养相互尊重的文化，而成年人亦应在这方面树立良好榜样。每年向所有长期教职员提供儿童保护的培训。所有兼职和志愿者均得悉儿童保护之安排。向有负责岗位的高年级学生，简报何谓适当的行动。
 - 2.10.11 如果收到儿童保护计划的学生因不明原因缺勤超过一星期，即根据教育局指引，通知社会福利署
 - 2.10.12 与香港相关机构建立有效联系，并因应需要配合他们对儿童保护事宜的查询。
 - 2.10.13 即使不需要立即提交该事件（例：低级别问题），亦会保留有关儿童问题的书面、注明日期和签署（或电子）记录。
 - 2.10.14 确保所有儿童保护记录都被安全保存在上锁的位置或安全的电子位置中，并与主要学生档案分开。只有指定高级教职员、指定教职员、照顾个别特定学生之教职员（指定保障负责人认为合适）才能访问。在当地法律范围内符合法规的情况下，记录将尽快转移到新学校（正常情况为5天内为最佳做法）。
 - 2.10.15 遵循法定指导程序，并在对任何教职员、志愿者或校长提出指控时，与当局密切合作；如对学校提出指控，将通知负责儿童保护的校董。良好做法需具备明确的调查记录，并将指控的结果保存在机密的员工档案中。
 - 2.10.16 对学校组织的在学校场地以外进行的所有活动进行风险评估；这包括尽可能确保场外供应商对其将与学校学生有联系的员工进行适当检查。
 - 2.10.17 确保立即纠正儿童保护安排中的任何不足或弱项。
 - 2.10.18 加强以下观念即所有儿童，无论年龄、残疾、性别、种族传统、宗教信仰、性取向或身份如何（亦谓受保障特征），都有权获得平等保护，免受各种类型的伤害或虐待。
 - 2.10.19 请记住，有些儿童由于受以前经历、他们的依赖程度、沟通需求、残疾或其他个人需求（例：背景保护）所影响，而会更加脆弱。
 - 2.10.20 确保所有教职员均知悉与寄宿学校相关的额外风险和责任，并接受适合其在寄宿学校角色的培训。
 - 2.10.21 确保学校的数字安全保障体系健全，包括使用适当的过滤和监控软件（由教职员定期检查），明确学生在网络安全方面的行为规范（包括人工智能的使用），以及根据学生年龄和能力分级设定其使用数字工具的权限（包括学前班和寄宿制学生）。更多详情请参阅学校的数字安全保障政策。
 - 2.10.22 透过多种措施确保校园安全，例如安装闭路电视监控系统、配备保安人员、设置围栏、有效管控宿舍等重点区域以及危险区域，并加强对工作场所的监督管理、健康安全管理和风险管理，运用数据分析、定期评估和持续的维护工作，从而提升校园安全水平。
 - 2.10.23 负责监督学校关于网络安全的政策和措施，并充分了解学校用于过滤和监控网络使用的系统。每年对相关措施进行评估，确保所有教职员都接受过适当的网络安全培训，并了解学校在网络过滤和监控方面各自的职责和权限。
- 2.11 《儿童法》（1989年）和《保障儿童在教育中的安全》（2025年）中指明「儿童的身心健康之

重要性是不可动摇的」。这意味着不应允许将可能适用于其他情况的保密考虑，凌驾于儿童免受伤害的权利之上。然而，在表达疑虑和正在调查时，应尽一切努力确保为所有相关人员保密。

- 2.12 我们认识到，遭受任何形式虐待的儿童可能会难以形成自我价值感。他们可能会感到无助、屈辱和某种责备感。对处于危险中的儿童而言，学校可能是其生活中唯一稳定、安全及可预测的因素。在校内，他们的行为可能具有挑战性或性格内向。在这些情况下，我们将与支持他们的其他机构联络。我们亦将确保，如果收到儿童保护计划的学生转学，他们的资料会立即安全地转移到新学校，并通知保护家庭及儿童服务课（FCPSU）。
- 2.13 哈罗香港的反欺凌和骚扰（包括网络欺凌）政策必须与儿童保护及保障政策一起阅读。任何严重的欺凌问题都将提交给指定保障负责人，并按照反欺凌和行为政策进行跟进。
- 2.14 所有儿童，不论年龄、身心障碍状况、性别、种族、宗教信仰、性取向或性别认同为何，都有权获得同等的保护，免受各种形式的虐待、忽视和剥削。所有工作人员都致力于保护儿童免受虐待，无论是在家中还是在其他场所。这包括确保儿童在网络环境中的安全，防止他们受到虚假信息、误导性信息和阴谋论的侵害，以及防止因人工智能被滥用而造成的伤害。

3. 角色和职责（同时见于 HS19）

3.1 指定保障负责人（DSL）：学校有一名指定保障负责人，负责处理有关儿童保护的任何事宜。

3.2 指定保障负责人的作用是：

3.2.1 认识如何识别虐待迹象，并知道何时联系社会福利署旗下保护家庭及儿童服务课（FCPSU），或虐儿案件调查组（CAIU）——以协助他们注意到儿童保护问题；

3.2.2 确保在转介时具备适当的信息，且转介是在保密的情况下以书面形式确认的；

3.2.3 酌情与社会福利署和其他机构联络；

3.2.4 作为建议和专业知识的来源，并让学校内的相关人员了解所采取的任何行动及需要采取的任何进一步行动；

3.2.5 确保妥善记录任何转介和采取的行动，并确保其安全性和保密性；

3.2.6 管理和提供教职员有关儿童保护培训，并每年（与合适的指定校董一起）审查儿童保护政策的运作，以确保程序有效并符合当前的最佳做法。

3.2.7 对统一中央记录进行定期检查；

3.2.8 透过定期审查有关网络滥用或不当网络行为的报告来监控网络安全，并在必要时采取相应措施。学校应至少每年对网络过滤和监控系统进行一次评估；

3.2.9 透过课堂教学和课外活动（例如集会、网络安全宣传日和数字素养能力培养活动等）来提升学生网络安全意识。

3.2.10 重要的是，指定保障负责人不能孤立地工作，因此，他们与来自学校各个部门且经过适当培训的高级职员团队会密切合作。

3.2.11 所有DSL和DDSL人员必须至少每两年更新一次他们的3级训练证书；

3.2.12 对于因涉嫌对儿童构成风险或伤害而被解雇或辞职的案件，应将相关信息提交给英国「信息揭露与禁入服务局」或其他相关的本地或国际机构。

3.3 校长：在学生安全保护方面，校长的职责是：

3.3.1 定期与指定保障负责人（DSL）会面，确保能及时发现并妥善应对儿童保护方面的风险。

3.3.2 与学校管理机构合作，确保学校的儿童保护政策和程序内容完善、符合最新标准，并包含以下内容：

3.3.2.1 所有形式的虐待行为的定义

3.3.2.2 虐待的迹象和表现特征的相关信息

3.3.3 如果工作人员或志工对儿童的情况有疑虑，他们应该采取什么措施。

3.3.4 如果工作人员或志工对儿童的情况有疑虑，他们应该采取什么措施。

3.3.5 阅读并了解国家和地方关于预防和应对虐待行为的指导文件。

3.3.6 了解学校所在地区的最新情况，以及如何使学生安全保护政策和程序能满足学校的特定需求。

- 3.3.7 确保所有教职员和志愿者定期接受儿童保护的培训。
- 3.3.8 为遭受虐待的儿童建立支持系统，例如安排学校心理咨商或联系外部支持服务机构。
- 3.3.9 确保学校的整体气氛、课堂教学和集会活动都能积极促进学生之间建立健康的人际关系。
- 3.3.10 确保孩子们知道，如果遇到问题，可以随时去找任何工作人员或志愿者寻求帮助，并且他们会认真倾听并给予重视。
- 3.3.11 确保学校广泛宣传各种求助渠道，让孩子知道，如果他们不方便与可信赖的成年人沟通，可以去哪里寻求帮助。
- 3.3.12 提供家长有关虐待儿童问题的相关信息，包括学校为预防虐待儿童以及为受虐待儿童提供帮助所采取的措施。
- 3.3.13 确保学校场地安全，并制定相关政策和程序，以规范访客入校流程以及确保接送学生的安全。
- 3.3.14 确保学校组织的校外活动和各类活动制定了相应的学生安全保护和儿童保护政策及程序，并已完成相应的风险评估。
- 3.3.15 在招募学校新教职员和志愿者时，校长和学校管理委员会必须遵循安全招募原则。他们必须确保对所有员工和志愿者进行必要的背景调查，并确保学校的记录信息保持最新状态。
- 3.3.16 校长和校董会成员应支持指定保障负责人进行儿童保护转介工作，并确保其本人及其助理有足够的时间和资源来履行职责。如果学校认为有儿童面临严重危险，但未获得适当的帮助，校长和校董会成员应质疑相关决定。
- 3.3.17 协助指定保障负责人向家长通报状况（除非有理由相信这样做会使孩子面临更大的危险）。
- 3.3.18 定期检视所有与儿童保护相关的政策和程序。
- 3.3.19 根据儿童保护事件中中学到的经验教训，更新儿童保护政策和程序。
- 3.3.20 如果有关于学校教职员或志工虐待行为的指控或疑虑，学校校长和校董会应根据情况与地方政府部门联系。
- 3.3.21 负责儿童保护事务的专员应至少每年向学校领导和校董会提交一份儿童保护工作报告。

3.4 所有教职员的责任

保护儿童免受伤害是所有教职员不可推卸的个人和专业责任。

教职员有责任向指定保障负责人（如其不在，则向副指定保障负责人）报告所有怀疑的虐待行为，然后由他们通知校长。校长或指定保障负责人，将通知负责儿童保护的校董。如指控涉及此处提到的任何人，该教职员应向其他指定人员之一作报告。如指控涉及指定保障负责人，则必须通知校长。如校长缺席，则应将其传递给指定校董，如指控与校长有关，也必须通知校董。

学校要求所有部门会议都必须将学生安全、健康和福利问题作为议程的首要内容，以促进学校的「安全文化」建设。

3.5 治理与监督

- 3.5.1 学校每年至少接受HISL（哈罗国际学校有限公司）和AISL（亚洲国际学校有限公司）的定期监督评估，评估内容包括学生保护措施的审查。
- 3.5.2 学校应每年对自身学生保护程序进行内部审计（并向校董会提交审计报告），每两年进行一次外部审计。
- 3.5.3 学校的指定保障负责人和副负责人应加入AISL哈罗学校学生保护网络，该网络提供最新的信息交流和最佳实践分享平台。
- 3.5.4 校董会负责学生保护的成员应定期与学生保护负责人会面沟通。
- 3.5.5 所有校董在就任前均需接受适当的学生保护和儿童保护训练（包括线上训练）。培训旨在使他们掌握相关知识，能够从策略层面评估学校的学生保护政策和程序是否有效，并确保学校能够全面有效地实施学生保护工作。校董的培训应定期更新。
- 3.5.6 校董应了解《1998年人权法》、《2010年平等法》以及当地多部门学生保护机制的相关规定。
- 3.5.7 校董应确保学校建立适当的筛选和监控机制，并定期评估其成效。此外，校董也应确保学校领导团队和相关人员了解并掌握相关规定，能够有效执行相关工作，并在发现问题时及时汇报。

3.6 举报和保密报告政策

- 3.6.1 如教职员或志愿者提出他们坦诚的担忧，他们将不会有任何形式的受害风险，且不会因而受到歧视或处于不利地位。更多详细资料，可参见于《举报和保密报告政策》。
- 3.6.2 专业人士应保护其在履行职责过程中，所获得的客户其个人资料的保密性，根据香港人权法案第14条、个人资料（私隐）条例、普通法和职业道德规范，故此，私隐在法律和道德上均应受到保护。然而，在特殊情况下可视情况而定，当有必要披露信息以防止对儿童造成可预见的伤害时，披露可能是合理的。

3.7 校董会的角色（BOG）

校董会对学生安全保障的政策和程序负有整体的责任。校董会负责审查学生安全保障的政策和实务。校董会高度重视职责，致力于维护学生福祉，保障学生安全，并确保学生免受伤害。为此，校董会将确保以下事项得以落实：

- 3.7.1 学校已制定并实施有效的、符合最新标准的学生安全保护政策，并将其提供给所有教职员，同时发布在学校网站上。
- 3.7.2 学校已制定并执行适当的政策和程序。
- 3.7.3 招聘前所需的所有审核工作均已按时完成，并已在统一的中央登记册中正确记录。

- 3.7.4 所有教职员均已接受与此政策相关的学生安全保护训练。
- 3.7.5 学校对学生进行安全教育，包括网络安全教育。
- 3.7.6 学校已设置适当的网络过滤和监控系统，以确保学生网络安全。
- 3.7.7 学校确保与相关机构和人员之间进行必要的沟通与信息分享。
- 3.7.8 网络安全：学校应明确负责网络使用过滤和监控的岗位职责，并每年对此进行评估。确保学校的网络安全系统稳定可靠，并定期进行监控和测试。

4. 虐待儿童

- 4.1 所有学校工作人员都应警惕学生可能遭受虐待的迹象，始终保持开放的心态，认识到“虐待行为可能发生在我们的学校”，并在发现任何可疑情况时立即报告。与负责儿童保护事务的老师或其助理人员沟通时，不妨先说「这可能没什么，但...」这样的话，可以帮助教职员克服报告问题的心理障碍。
- 4.2 学校所有教职员均应警惕可能存在的虐待学生的迹象。虐待可能有多种形式，且它们之间并不相互排斥。同样重要的是，要记住虐待行为不仅可能发生在现实生活中，也可能发生在网络上：

4.2.1 **身体虐待**可能包括击打、摇晃、抛掷、中毒、烧伤或烫伤、溺水、窒息，或以其他方式对儿童造成身体伤害的方式。当父母或照顾者捏造或故意诱发儿童生病，也可能构成身体伤害。

4.2.2 **情绪虐待**更难察觉，可能是由于向儿童传达他们一文不值，或戏弄、羞辱、否认爱和感情、兴趣或友谊。它可能包括强加给儿童发育不当的期望，即超出儿童发育能力、或过度保护的互动，以及限制其探索和学习机会。

情绪虐待可能包括看到或听到他人的虐待、欺凌（包括网络欺凌）以及对儿童的剥削或腐败。某种程度的情绪虐待会涉及所有类型的儿童虐待，但它亦可能会单独发生。

4.2.3 **性虐待**涉及强迫或引诱儿童或青少年参与性活动，不一定涉及高度暴力，亦不论儿童是否意识到正在发生的事情。这些活动可能涉及身体接触或非接触活动，例如让儿童观看或制作性图像、观看性活动、鼓励儿童以不恰当的性行为方式行事，或为儿童打扮以准备性行为等等滥用行为（包括通过互联网）。一个常见误解是成年男性为性虐待的唯一肇事者；与其他儿童一样，妇女也可能犯下性虐待行为。根据英国政府《确保儿童在教育中的安全》（2022年），学校应对性暴力和性骚扰采取零容忍态度。任何此类事件均将按照学校的《反欺凌和行为政策》进行追究。

性虐待可能涉及身体接触或非接触活动，例如让儿童观看或制作性图像、观看性活动、鼓励儿童以不恰当的性行为方式行事，或为儿童打扮以准备性行为等等滥用行为（包括线上及遥距接触）。

4.2.4 **英国政府对儿童性剥削的法定定义是：**

「儿童性剥削是儿童性虐待的一种形式。它指的是个人或团体利用权力不平等地位，强迫、纵或欺骗18岁以下儿童或青少年从事性活动，目的在于：（a）以满足受害者需求或欲望为交换；和/或（b）为施暴者或参与者谋取经济利益或提升社会地位。即使受害者表面上同意进行性活动，也可能构成儿童性行为。」

4.2.5 **疏忽照顾**是持续未能满足儿童的基本生理和/或心理需求，例如提供足够的食物、衣服和住所（包括被排除在家中或被遗弃）、保护免受身体和情绪伤害或危险、获充分监督（包括使用不适当的照顾者），以及获得适当的医疗保健或治疗。

还会有其他情况，但不构成虐待，但这会引起对学生福利的严重关注。有关青少年处于道德危险、无人照顾、从事反社会或不当行为等问题，可能会被转介给指定保障负责人，他将与校长讨论此事，并在必要时与社会福利署讨论。此类个案亦可转介至学校保健中心。在每个个案中，必须通知学校指定保障负责人。

5. 程序

5.1 父母或照顾者可能构成虐待之案例

5.1.1 如怀疑或知晓之虐待行为，必须报告给指定保障负责人或其副手，他们将在「需要知道」的基础上与校长，及可能与学生相关的社际工作人员分享此类资料。

5.1.2 任何收到学生报告有关虐待的成年人，均有责任倾听学生的意见，并提供保证，且随后记录学生的陈述。他们不得压迫学生、提出探究性问题或建议答案。然后，他们应报告这种情况，并与指定保障负责人讨论，后者将与校长协商。在所有阶段中，均必须参考学校的《儿童保护程序》。

5.1.3 同时，可能需要迅速安排进行专家医疗诊断。指定保障负责人、其副手或校长，将与社会福利署协商后安排此项工作。

5.2 教职员或志愿者可能构成虐待之案例

5.2.1 如指控一名教职员或志愿者有以下行为，则应遵循如下所述的指控管理程序（另见附件 A）：

- i) 以可能伤害儿童的方式行事;
- ii) 可能犯下针对儿童或与儿童有关的刑事犯罪; 或
- iii) 以显示他们不适合与儿童共处的方式对待儿童，或儿童之行为显示他们不适合与其共处

5.2.2 如对教职员或志愿者提出指控，则必须予以回应; 且显然需要立即并谨慎行事。为所有相关方的利益，迅速解决指控必须是一个明确的优先事项。必须告知举报人，此事将保密地转交给适当人事跟进。须记紧此事应如此处理，并在同一天以书面记录，接着传递给校长。如指控涉及校长，则必须将详细资料传递给负责儿童保护的校董。

5.2.3 在负责儿童保护的校长或校董能够与社会福利署商定指控或疑虑是否表明可能存在之虐待前，这些情况应受到严格保密。未经与社会福利署协商，学校将不会进行调查。所有指控必须在一个工作日内，提交给社会福利署。与社会福利署协商的可能结果是：

- i) 不应采取进一步行动
- ii) 已达到显著的危害临界值，应进行策略讨论
- iii) 此事应交由警方/虐儿案件调查组（CAIU）进行刑事调查
- iv) 此事可能构成职业守问题，涉事者所属单位应对其进行纪律调查。

5.2.4 社会福利署将与学校讨论该教职员在等待进一步调查时，是否可以继续留校。是否实施停职/休假应由雇主自行决定，尽管只有在没有合理选择之情况下才应如此进行。如指控涉及社际教职员或其他住宿工作人员，则可能要安排远离学

校之住宿。如指控是针对一名教职员，而警方或虐儿案件调查组（CAIU）决定进一步处理此案时，则须要求他们说明时间表是否合理。社会福利署也可在流程方面提供建议。这些决定很可能会由学校与学校的法律顾问和人力资源部共同作出。

i) 程序需要根据常识和判断来运用

ii) 如指控被发现具有恶意，将从人事记录中删除

iii) 所有其他指控的记录必须保存在员工档案中，但任何未经证实、毫无根据或恶意的指控，均不会在雇主推荐信中提及。

5.2.5 更好的是学校能预测潜在风险，并设法防止所有合理误解和虚假指控有关之风险。适当的政策和程序，也可能会阻止任何试图利用学校作为与学生建立不正当关系的基础的个别人士；《哈罗香港儿童保护及保障的行为准则》和《教师及行政人员之专业指引》文件有助员工了解哪些行为通常被认为与其专业身份不符。然后，将根据需要对违规行为进行纪律处分。

5.2.6 许多教师担心职业生涯可能会因儿童的脆弱或恶意指控而受到无法弥补的损害，这是可以理解的。实际上，这是极其罕见的。被发现提出恶意指控的学生可能会受到学校制裁，其中可能包括停学或永久开除。

5.3 学生可能遭受虐待之案例（儿童对儿童的虐待）同见于【儿童对儿童的虐待】

5.3.1 根据学校的《行为准则》，在调查期间，被指控虐待的学生可能会被停学。学校将听取社会福利署关于调查此类指控的建议，并将采取任何适当的行动，以确保所有相关学生的安全和福利，当中包括任何被指控虐待的学生。如警方有必要就虐待指控，对学生进行面谈，学校应将尽快收到通知，并确保在面谈期间有适当的成年人支持学生。如有任何合理理由怀疑儿童正在遭受或可能遭受重大伤害，欺凌事件将被视为儿童保护之问题。

5.3.2 所有关于霸凌的指控和报告都应在CPOMS系统中记录，儿童保护小组将评估该事件是否构成儿童虐待。如果有合理理由怀疑儿童正在遭受或可能遭受严重伤害，则该霸凌事件将被视为儿童保护问题。

5.3.3 学校的社会愿景中声明：「一个充满关爱、相互尊重的社区，每个人都能在其中茁壮成长」，强调所有学生相互尊重的必要性，并且将透过课程去探讨解决虐待儿童之问题。任何儿童对儿童虐待的事件都将记录在适当的登记簿中，并且将根据学校的《行为准则》对相关模式进行调查。

5.3.4 我们体认到，强迫他人分享裸露或半裸露照片，以及利用此类照片勒索或控制他人，都可能构成儿童虐待行为，并造成严重伤害。因此，我们将采取适当的调查措施、进行相应的纪律处分，并为受害者提供必要的支持。

5.3.5 关于有害性行为，可参考布鲁克红绿灯评估工具（见附件）。

5.3.6 人们普遍认为，女孩更容易成为受害者，而男孩更容易成为施暴者，但无论如何，任何儿童对其他儿童的虐待行为都是不可接受的。

5.3.7 学校对学生之间发生的霸凌行为持零容忍态度，但每起案件都会根据具体情况进行评估，并充分考虑受害者的意愿（如有必要，也考虑家长的意见）、其年龄以及任何特定的风险因素（例如特殊教育需求或残疾），并制定相应的支持方案。这可能包括安排学生接受学校或外部的心理咨询服务。

5.3.8 后续措施应包括对施暴者进行相应的纪律处分和/或修复性措施，包括必要的停学处分。

5.3.9 在调查案件期间，应进行风险评估，以防进一步的伤害发生。

5.3.10 学校体认到，特殊教育需求学生更容易成为霸凌的对象。

5.3.11 学校认识到，即使没有通报的霸凌案件，也不表示霸凌行为没有发生。因此，学校鼓励师生保持警惕，一旦发现任何可疑迹象，应立即报告。

5.4 投诉和指控

5.4.1 区分针对员工的投诉和指控是十分重要。指控是关于一名教职员对学生的行为方式，这可能对他们构成伤害。投诉是关于教职员运用学校政策的方式。

5.4.2 任何涉及教职员或志愿者涉及身体虐待、情绪虐待或性虐待，或对其疏忽照顾之可能性有关的问题，由此至终均将与香港社会福利署讨论，并听取他们的建议。

5.4.3 若对住宿管理人员提出任何指控，学校将安排该工作人员暂时离开原住宿场所，直至调查结束。

6. 涉及不當性行為的指控

- 6.1 如学生将涉及任何形式的不当性行为之事件告知教职员，无论是在学生之间，还是在教职员与学生之间，均应采取以下步骤：
 - 6.1.1 以同理心地倾听，然后记下至《哈罗香港保障关注表格》或儿童保护网上管理系统（CPOMS）上披露的内容（详见附件 11）。
 - 6.1.2 立即联系指定保障负责人，他们将与校长讨论，并因应情况与社会福利署讨论，以确定是否需要进行转介。
 - 6.1.3 一旦他们收到通知并同意由学校单独跟进该问题，指定保障负责人（或其副手、学校心理学家顾问）将与投诉人面谈，并尽快向负责监督研讯的纪律方面的校长报告。
 - 6.1.4 如社会福利署寻求进一步调查，他们会自行展开调查。这通常会涉及警察、指定保障负责人、学校心理学家和校长。在这种情况下，学校的纪律调查将会暂停，直到社会福利署批准为止。
- 6.2 由于个案可能牵涉滥用信任，无论投诉人是16岁以上还16岁以下，均应实施该政策。指定保障负责人应尽快通知家长，并转介至社会福利署，除非这样进行会使学生面临更大的伤害风险。如有任何疑问，指定保障负责人会事先咨询警方和社会福利署。

7 员工行为准则

- 7.1 师生之间的友好关系是一所快乐和生机满载的寄宿学校之核心。与此同时，为了各方利益，在任何场合均须遵守职业界限；它们在《哈罗香港儿童保护及保障行为准则》和员工手册中的《教师 and 行政人员专业指引》中有所概述。
- 7.2 师生之间的友好关系是一所快乐和生机满载的寄宿学校之核心。与此同时，为了各方利益，在任何场合均须遵守职业界限；它们在《哈罗香港儿童保护及保障行为准则》和员工手册中的《教师 and 行政人员专业指引》中有所概述。
- 7.3 教师绝不应该以可能被解释为具有性暗示或可能被解释为身体攻击的方式，与学生说话或触摸身体。其行动和意图两者，在往后可能会引起问题。
- 7.4 应谨慎对待教职员与学生（尤其是那些可能更脆弱的学生）之间的一对一会面。如有疑问，建议让他人 在场，或让他人知道会面正在进行或通知其直属经理，并记录会面的原因和情况，打开着门，坐在桌子后面，并使用具有玻璃墙之教室等措施。
- 7.5 在进行体育指导或音乐教学时，应特别小心，因为可能需要与学生进行身体接触以证明正确的定位，或进行一对一教学。如有疑问，请联系指定保障负责人寻求指引。各部门负责人将就适当的和针对特定主题的行为和准则，向其部门的工作人员提供额外的培训和指导。
- 7.6 就其性质而言，在寄宿学校工作，让教职员有机会在「宛若在家」的环境中，与学生建立密切关系并为他们提供支持。虽然这对教职员和学生具有很多益处，但在寄宿环境中工作也存在一定风险，教职员应格外警惕，避免将自己置于脆弱的境地，或可能被误解的境地之中。社监将就适当的和特定于寄宿的行为和举止，向其宿舍的教职员提供额外培训和指引。如有疑问，请联系指定保障负责人或辅导组资深领导者寻求指引。
- 7.7 教职员和学生之间的任何电子通信均应非常谨慎，并应始终遵守学校《有关教职员的ICT 可接受使用政策》。良好的做法包括重视和尊重儿童作为个体，且担当适当成人的行为榜样，应由始至终一直排除欺凌、叫喊、种族主义或性别歧视。教职员不应向学生发送私人电子邮件，任何发给学生的电子邮件在语气和内容上均应保持专业。教职员可以通过 LinkedIn 等专业网络平台联系本校校友，但在学生读毕大学前，教职员不应通过 Facebook 等社交媒体与他们联系。
- 7.8 拍摄学生及学生学习状况的照片或视频，只能使用学校拥有的电子设备。有关良好做法的更多建议，请参阅：英国政府指引《在教育环境中与儿童和青少年一起工作的成年人的安全工作实践》。

8 报告问题的程序

8.1 教职员可能会通过多种方式提出怀疑或疑虑，其中最有可能的是：

8.1.1 教职员的行为准则；

8.1.2 「披露」虐待行为的儿童、父母或教职员；

8.1.3 瘀伤或身体受伤的迹象，它们可能一同出现，亦可能个别出现；

8.2 如教职员有此类顾虑，应立即使用《哈罗香港保障关注表格》或儿童保护网上管理系统（CPOMS）向指定保障负责人报告，并在 24 小时内应获得书面形式确认。

8.3 延迟处理可能会损害儿童的福利。如问题与教职员的行为有关，也应直接向校长报告；且显然需要立即并谨慎行事。

8.4 指定保障负责人/校长将考虑该报告，并立即（应在24小时内）将其转交给相关政府部门，或者在采取适当的建议（可能包括在保密的基础上，与社会福利署或警察）决定不将疑虑提交给当局，但保留对疑虑的完整记录。

9 如儿童披露的话，该怎么办

9.1 如你在儿童或青少年进行披露时卷入潜在的儿童保护情况中，以下信息旨在为你提供帮助。 **请注意，这与因纪律问题而对学生进行面谈，两者完全不同的程序。**

- 9.1.1 聆听，让学生完成而不直接提问或阻止他们。让他们告诉你他们想要甚么，仅此而已。他们可能需要稍后向专家披露，现在过多的细节可能会干扰往后的调查。
- 9.1.2 面谈结束后，确保学生感到安全，并解释你接下来要做什么。
- 9.1.3 写下笔记，包括面谈的日期和时间，并在笔记上签署。然后尽快（最好是立即）用学生自己的话在《哈罗香港保障关注表格》或儿童保护网上管理系统（CPOMS）上记录尽可能所有的内容。
- 9.1.4 保持冷静，并通过言语和行动传达此点；向学生保证你会认真对待他们所说的话。
- 9.1.5 在同一工作日向指定保障负责人报告并提供事件的书面记录（在《哈罗香港保障关注表格》或儿童保护网上管理系统（CPOMS）上）。

9.2 保密

- 9.2.1 在儿童保护有关的所有问题上，保密管理是一个非常重要的元素。
- 9.2.2 教职员不应该向学生或成人提供绝对保密的保证，但必须确保信息只透露给需要知道的人。从一开始，确保这一点就很清楚，而不是最后才突然出现在学生身上。
- 9.2.3 应该向儿童和青少年解释，如果保守秘密意味着他们或其他人可能会继续受到伤害，那么就不能也不应该保守秘密。

9.3 披露之后

- **保持冷静**
尽量不要通过口头或肢体语言重，将你的愤怒、震惊、痛苦或尴尬传递给儿童。
- **表现得像你相信儿童一样**
- **让儿童感到安心**
这不是他们的过错；很庆幸他们有告诉你等等
- **让儿童说话/讲毕其经历**
不要质疑儿童
- **立即将事件报告给指定保障负责人（DSL），或者在他们不在的情况下，向副保障负责人（DDSL）或校长报告，并转达你所做的笔记。**
- **向儿童解释，你可能需要与另一个机构的工作人员交谈，他们的工作是帮助和保护儿童，他们可能会想与儿童交谈，但你愿意与儿童待在一起并在可能发生的情况下支持他们。**

- **确认孩子安全无恙，并且可以回到教室或参加活动。** 如果孩子情绪过于激动，无法继续上课或参加活动，则应将其带到学校医务室。也可以请学校辅导老师前来协助处理。

9.4 及早协助

- 9.4.1 人们普遍认为，尽早为处于危险境地中的儿童提供支持至关重要。英国儿童保护协会（NSPCC）指出：「及时提供支持至关重要。尽早识别并满足儿童或家庭的需求，可以增强对儿童福祉有益的保护因素，并减少可能对儿童生活造成负面影响的风险因素。研究表明，及早提供帮助和干预措施可以保护儿童免受伤害，减少需要转介至儿童保护机构的情况，改善儿童的长期发展提供帮助和干预措施可以保护儿童免受伤害，减少需要转介至儿童保护机构的情况，改善儿童的长期发展前景，帮助儿童的生活能力为
- 9.4.2 哈罗香港学校拥有完善的辅导团队，由学校心理师领导。学校可提供早期介入服务，参与者包括学校心理师、保健中心护理师、学校辅导员、青少年心理健康工作者、助理心理师。
- 9.4.3 学校的支持系统能够及时有效地介入，并与学生保护专员/助理学生保护专员、学生及其家庭合作，根据个案情况为学生提供最合适的后续支持。
- 9.4.4 学校定期提醒教职员工，一旦发现学生有任何问题，应立即采取行动。

10 转介过程

- 10.1 如果按照本文件中概述的程序，怀疑虐待儿童，指定保护负责人或其他指定人员将联系社会福利署的相关办公室。
- 10.2 如有涉嫌性虐待之个案，且受害人是17岁以下的儿童，或者在严重的身体虐待案件中，受害人是14岁以下的儿童，警方的虐儿案件调查组（CAIU）将负责调查这些指控。指定保障负责人可以直接或通过保护家庭及儿童服务课（FCPSU）联系虐儿案件调查组（CAIU）。
- 10.3 如已进行转介，则应向该机构提供以下信息：
- 引起关注的直接原因，和任何直接的危险
 - 儿童的全名、出生日期、地址、身份证号码，及其残疾或特殊需要
 - 儿童的行踪
 - 父母或照顾者的姓名、香港身份证号码，以及其他家庭成员的详细信息，例如兄弟姐妹。
 - 家庭医生的姓名
 - 学校名称
 - 联络人的姓名、职衔及电话
 - 其他证人和其他机构的姓名
 - 你可能拥有的任何其他相关信息
 - 重要的是请谨记，如案件发展至法庭诉讼程序，提交的文件可能会成为证据的一部分。

联系方式：

屯门保护家庭及儿童服务课（FCPSU）社工主任：**2618 5614 / 2618 5710 / 9460 4046**

社会福利署的部门热线：**2343 2255**

11 更安全的招聘

- 11.1 在学校雇员入职前，所有教职员都将进行适当检查，以确保没有任何人士具备不应与儿童一起工作之理由。这些招聘检查将基于英国2024年9月的《保障儿童在教育中的安全》指引和英国内政部的《外国国民犯罪信息查询的申请流程》（A-F、G-P 和 Q-Z）中的指引。此外，这亦已参阅了香港教育局通函第65/2010号《加强保障学童的措施：学校人事聘用事宜》及教育局通函第180/2011号（提供非正规课程的私立学校 采用性罪行定罪纪录查核机制）。所有检查结果必须在就业开始前，提交给人力资源部门进行检查（如果因物流问题无法做到此点，则应尽快提交给人力资源部门）。

学校招聘程序的全部详细信息，可以在《招聘和遴选政策》中找到

- 11.2 志愿者、家长帮手和校外活动提供者则另有具体的入校和检查程序，可在《志愿者政策》中找到。

12 参考

12.1 本政策是根据旨在保护香港和世界各地儿童的法律和指引而制定的。具体来说：

- 联合国《儿童权利公约》（UNCRC），由联合国于1989年通过（第44/25号决议）。该公约承认并保护儿童的基本自由和固有权利，并于1994年起适用于香港。
- 《保障兒童在教育中的安全》（2025年）
- 1989年和2004年英国《儿童法》
- 英国海外学校标准（DFE 2023）
- 共同努力保护儿童（英国政府 2023）
- 英国儿童保护协会（NSPCC）
- 《保护儿童免受虐待—多专业合作程序指引》（2020 年修订）

持有人：高级副校长（全校）

更新日期：2025年8月

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13 附件

附件A - 指控管理

附件B - 该与谁交谈？担忧和投诉

附件C - 虐待的定义和潜在指标

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附件A：指控管理

1. 当指控教职员或志愿者有以下行为时，应遵循指控管理程序：
 - 以伤害或可能伤害儿童的方式行事
 - 可能犯下针对儿童或与儿童有关的刑事犯罪；或
 - 以显示他们可能对儿童构成伤害风险的方式对待儿童。
2. 学校所有教职员均应立即向校长报告此类指控。（如校长缺席，则为负责儿童保护的校董）唯一例外是如果指控涉及校长，在这种情况下，应该向负责儿童保护的校董报告。
3. 在得知符合准则的指控后，负责儿童保护的指定保障负责人、校长或校董应在一个工作日内，联系社会福利署。社会福利署声明初步调查的目的是收集和分析信息.....决定是否有理由相信儿童已经或正在被虐待.....确定未来是否存在虐待风险或可能性。社会查询/调查的结果将构成儿童福利计划的基础”。
4. 所有与指控相关的讨论内容都应妥善记录并保密。
5. 在屯门区的话，可联络保护家庭及儿童服务课（FCPSU）的社工主任：2618 5710 或 9460 4046。
青山警署的电话则为T 3661 1668。
6. 如果有人举报某个组织或个人在非上课时间（例如暑期夏令营、周末补习班）使用学校场地，学校校长、指定保障负责人或学生保护委员会成员将联系社会福利署以及该组织的管理人员（前提是该组织并非被举报的对象）。

附件B: 该与谁交谈?

对学校或家中生活有担忧和关注是很正常的, 例如:

- 感觉无法应付你的事务或其他活动。
- 挣扎于与其他学生之间的友谊或关系。
- 担心其他人 (学生、教职员或校外人员) 不友善、不尊重或辱骂他人。
- 担心因种族、宗教或其他原因而受到与他人不同的对待。

一个人生理上的不愉快可能由于他人的故意行为, 但也可能由于他人粗心的行为而造成。欺凌类型的行为是指任何被认为是故意或反复侮辱、羞辱、恐吓或伤害他人的行为; 哈罗香港不会容忍这种行为。

如这些问题中的任何一样导致学生担心或不愉快, 抑或如果任何学生意识到校园社群中的其他人感到不愉快, 如是者, 与可信任的人交谈是必不可少的。学生把事情藏在心里, 最终只会感到更不愉快, 而且亦会让最初的问题变得越来越严重。任何学生都不应该觉得没有人在乎自己。

有很多潜在的人士可以提供帮助:

- 父母或监护人
- 家庭的其他成员
- 指导者、导师或同伴
- 好友
- 社监
- 社辅导团队中的任何成员
- 任何教师
- 学校或社领袖生
- 学生健康大使
- 校监
- 学校保健中心内的职员 (2299 6215)
- 学校心理学家或辅导员
- 资深领导团队成员

此外, 还有一些在香港可以联络的外部机构:

- 社会福利署 (2343 2255)
- 香港撒玛利亚防止自杀会 - 24 小时情绪支持 (2389 2222)

附件C：虐待的定义和潜在指标

1. 了解有关儿童虐待

- 1.1 从广义而言，儿童虐待被定义为任何危害或损害18岁以下个人身心健康和发展的作为或不作为。这种行为是根据社区标准和专业知识的结合来作判断的。它是由个人单独或集体犯下的，施害者他们根据自己的特征（例如年龄、地位、知识、组织形式）处于不同的权力地位，导致儿童容易受到伤害。虐待儿童不仅限于儿童父母/监护人情况，但包括任何受托照顾和控制儿童的人，例如保姆、亲戚、老师等。对于儿童性虐待，该行为也可能由陌生人对儿童施行。虐待也可能由其他年轻人士实施（例如：儿童对儿童的虐待）
- 1.2 本《程序指引》对儿童虐待的定义，是为了方便相关专业或人员保障受虐儿童或有受虐风险的儿童的福利。这并不是一个法律定义。当需要检控施虐者时，应参考现行的相关条例。还应注意的是，涉及儿童福利但未在本《程序指引》中定义为虐待儿童的案件也应谨慎处理，并提供适当的服务以确保儿童的最佳利益。
- 1.3 在决定个案是否应被界定为儿童虐待时，负责的专业人士应根据个案的具体情况作出评估，并考虑各种因素（例如：儿童的年龄、行为、行为对儿童的后果）等，而不是仅仅关注已发生事件的频率和性质。

2. 虐待儿童的类别：同见于本政策第4部分

3. 可能为虐待儿童的指标

- 3.1 在调查任何怀疑虐待儿童个案时，负责的专业人员应参考儿童、父母和家庭所表现出的指标。物理指标通常是很容易观察到的指标，可能是轻微的，亦可能是严重的。儿童的行为有时可能是虐待儿童行为的线索。行为指标可以单独存在，也可以与物理指标共同结合存在。它们可能很微小，也可能由儿童以图像所陈述。父母的行为和态度、他们自己的生活经历，甚至他们的家庭条件，也可以为虐待儿童的存在提供有价值的线索。
- 3.2 本章所列出的指标并非详尽无遗。即使存在一个甚至多个指标，也不一定证明虐待儿童的存在。然而，如果一个指标重复出现、多个指标同时存在，或存在严重伤害，则应认真考虑虐待儿童的可能性。有关不同类别虐待儿童的行为指标可能会互换，应视乎情况而定。
- 3.3 这些指标仅对具备处理儿童和家庭的培训和经验之专业人员有用。它们有助专业人士进行评估，应谨慎使用。当中有些部分将比其他部分，与特定某些职业更有相关性。（例如：非医疗专业人员不应熟悉或试图解释本章中规定的不同形式之骨折或内伤）。

4. 识别可能是虐待儿童的清单

以下列表旨在帮助专业人士和各方，识别可能存在的虐待儿童问题，仅供参考。它并非详尽无遗，应根据儿童的年龄适合性和他/她的能力，而予以适当考虑。（例如：受保障的特征、特殊学习需要、伤健人士）

4.1 身体虐待

如对受伤的身体迹象其性质或严重程度有疑问，应尽快将有关儿童送医。

4.1.1 瘀伤和伤痕

- 应根据发育年龄（例如：儿童是否能够行走）、瘀伤的数量、大小和分布，以及它们是否显示因直接撞击物体、拳击、抓握和/或叮咬而造成。
- 瘀伤为不太可能是意外而成的，例如：大面积的瘀伤、不寻常位置的瘀伤、不同时期所受到的多处瘀伤，或生殖器周围的损伤均是可疑的。
- 咬痕是受伤的具体迹象。如及早发现，伤痕本身可能包含足够的信息来帮助识别施害者。
- 真皮黑色素细胞增生症（蒙古斑）是背部、臀部、脊柱底部、肩膀或其他身体部位的非癌性蓝色或蓝灰色斑点，会影响年幼的儿童，特别是亚洲儿童。斑纹可覆盖背部大面积，多呈扁平状，形状不规则，边缘不清晰，皮纹正常，宽大约2至8厘米或更大。真皮黑色素细胞增生症有时会被误认为是瘀伤。这可能会引发有关可能虐待儿童的问题。重要的是要认识到真皮黑色素细胞增生症是胎记，而不是瘀伤。

4.1.2 撕裂伤和擦伤

- 手部、臀部或脚部的撕裂伤会损伤下面的肌腱，可能会导致残障。
- 唇系带（连接上唇和上牙龈中间的一块组织）的撕裂可能表明曾受强迫进食。

4.1.3 烧伤和烫伤

- 无意或有意造成的烧伤/烫伤可能难以区分。
- 一些曾遭受的烧伤可能呈现烧烫物体的形状或图案，例如加热的碟盘、香烟。
- 「手套和/或长袜」的分布表示四肢或臀部曾被浸入性（浸泡）烫伤。

4.1.4 骨折

- 这些应该被单独解释/处理。

4.1.5 内部受伤

- 脑/头部受伤

可能是由于直接撞击、摇晃或穿透伤害。

「摇晃婴儿综合症」是身体虐待儿童中最常见的死亡原因。

- 腹部受伤

内脏穿孔可能导致腹痛和呕吐。

在没有任何外伤迹象的情况下，可能会引致严重受伤甚至死亡。因此，如果不想漏诊腹部损伤，则需要高度警觉。

4.1.6 其他

- 虚构或诱发的疾病，包括代理型孟乔森综合症
- 下毒
- 因拉扯或火烧而脱发
- 遇溺
- 婴儿猝死

在正式验尸官检查完成之前，不应下结论。

4.2 性虐待（不论男女）

4.2.1 物理指标

- 内衣裤撕破、染污或染血
- 抱怨生殖器官部位痛楚、肿胀或痕痒
- 抱怨小便痛楚
- 外生殖器、阴道或肛门、口部或喉部瘀伤、流血或撕裂伤
- 阴道/有分泌物
- 性病
- 青春期怀孕

4.2.2 行为指标

- 食欲不振
- 对年幼儿童作出性利用行为
- 朋辈关系不佳
- 不愿参加体育活动
- 行为问题（包括患上厌食症、过度肥胖、自残、离家出走、自杀、性滥交、滥用药物）
- 就该名儿童的年龄而言，其性知识和性行为异常丰富
- 学习成绩显著改变
- 睡眠不安
- 过度自渎
- 对被触碰反应过敏
- 极不喜欢在某处逗留或与某人一起

4.3 疏忽照顾

4.3.1物理指标

- 营养不良、体重过轻或缺乏足够质量的饮食
- 發育遲緩
- 严重的皮疹或其他皮肤问题
- 由不合适人士（例如年幼儿童）照顾儿童
- 长时间或参与危险活动时照顾不足
- 身体问题不获理会，或医疗/牙科治疗的需要不获照顾
- 长期满身污垢/衣衫褴褛
- 长期缺课，或被剥夺求学机会
- 家里发现腐烂食物
- 居住环境欠整洁（例如满布垃圾、排泄物和污垢等）
- 长期没有人看管年幼儿童
- 完全遗弃或长时间遗弃儿童
- 把儿童禁锢家中

4.3.2 行为指标

- 经常表示饥饿或到处寻找食物，狼吞虎咽或乞讨，偷取食物
- 承担与年龄不符的责任
- 瘾癖
- 犯罪
- 投诉得不到足够照顾、管教或培育
- 命令儿童过分长时间工作/担当超出其体能的工
- 朋辈关系不佳
- 以单字回答问题
- 极度恐慌
- 因管教不足而出现性行为
- 不愿回家
- 离家出走

4.4 心理/情感虐待

4.4.1 物理指标

- 不能健康成长
- 发育迟缓，例如：语言障碍
- 厌食症

4.4.2 行为指标

儿童方面的指标

- 疏离感
- 习惯紊乱
- 遗尿/便溺
- 学习障碍，例如：学业成绩显著变差
- 智力、情绪及社会方面发展迟缓
- 伤害自己或有自杀念头/企图
- 破坏行为或行为问题
- 睡眠不安
- 食欲不振
- 语言障碍

家庭方面的指标

- 排斥
- 终日责骂
- 侮辱性的批评
- 恐吓
- 鼓励偏差行为
- 奇怪的惩罚方式
- 以不当的家务方式作惩罚

5. 通常与虐待儿童相关之特征

任何家庭都可能发生虐儿事件，而这些家庭的背景未必相同。现将虐儿个案的常见特征载列如下，但仅作参考之用，不当当作发生虐儿事件的证据。另一方面，部分发生虐儿事件的家庭可能没有任何下列特征。

6. 家庭

- 家居凌乱不堪或异常整洁
- 被社会孤立
- 家庭出现危机或压力，例如：怀孕、迫迁、离婚/遗弃/分居、婆媳纠纷
- 文化/迷信观念
- 家庭暴力，例如：虐待配偶

7. 父母

7.1 个人经历

童年被虐待的纪录

- 童年不快乐或曾遭遗弃；严重缺乏身体/情绪照顾
- 曾经发生/经历家庭暴力或其他暴力事件
- 曾经有严重的复发病症和/或精神病纪录
- 酗酒/滥用药物/沉迷赌博

7.2 态度和行为

- 对子女有固执或不合理的期望
- 坚信严厉的管教/体罚
- 对子女过分批评或冷漠
- 父母不成熟
- 自我形象低落

- 被动
- 父母双方或其中一方智力较低
- 无法承受压力
- 无法控制愤怒
- 家庭角色分散和混乱
- 性问题

- 子女的受伤原因令人难以信服或前后矛盾
- 没有或延误就医
- 父母管教不当

8. 儿童

- 早产
- 不想生下的儿童
- 非婚生子女
- 有喂食或睡眠问题的婴儿
- 不能健康成长的婴儿
- 年幼时与父母分离
- 分娩时有困难
- 以南辕北辙方式教养的儿童，例如儿童并非在家中受教养
- 肢体伤残或智障儿童
- 被指与家庭不幸有关的儿童
- 女性
- LGBTQ+
- 特别学习需要

9. 教职员也应该了解的其他形式的虐待行为包括：

- 儿童辍学问题
- 儿童性剥削
- 儿童犯罪利用
- 家庭暴力
- 以维护荣誉为名的暴力行为、女性生殖器切割、强迫婚姻和烫乳等陋习
- 极端主义思想的传播
- 家庭成员被监禁的儿童
- 儿童遭受其他儿童的虐待
- 性暴力和性骚扰

这些可能表现为：

1. **儿童辍学：**儿童辍学可能是虐待或忽视的潜在迹象。工作人员和社区成员（包括父母和监护人）应将任何令人担忧的学生缺勤情况（尤其是反复或持续较长时间的缺勤）报告给儿童保护工作者或学校儿童保护联络员，以便及早发现虐待和忽视的风险，包括性虐待，并帮助预防儿童再次辍学的风

险。

2. 儿童性剥削：指利用儿童从事性活动，并以此获取某种利益（例如食物、住所、毒品、酒精、礼物、金钱或情感满足）的各种情况、环境和关系。性剥削的形式多种多样，从看似「双方自愿」的关系到由犯罪集团实施的严重组织犯罪，不一而足。施害者总是对受害者拥有某种控制权，随着性剥削关系的加深，这种控制权也会不断增强。性剥削通常伴随着不同程度的胁迫、恐吓或诱骗，包括同侪施加的性行为压力、网络霸凌以及其他形式的性虐待。需要注意的是，有些遭受性剥削的儿童可能不会表现出任何明显的受虐迹象。

3. 女性生殖器切割术 (FGM)：指任何涉及部分或全部切除女性外生殖器，或对女性生殖器官造成其他伤害的行为。AISL在此问题上遵循英国的规定：对于任何18岁以下女性遭受女性生殖器切割术的报告，AISL均有义务将其上报相关部门。

4. 极端化：指一个人逐渐支持恐怖主义和极端主义思想的过程。目前尚无任何可靠的方法能够准确地识别那些容易受到极端主义思想影响的人。一些特定的个人背景因素可能导致人们更容易受到极端主义思想的影响，而这些因素往往会与家庭、朋友或网络等方面的特定影响因素相互叠加，并与某些需求相吻合，而极端主义或恐怖组织似乎恰好能够满足这些需求。与管理其他安全风险一样，工作人员应密切注意儿童行为上的任何变化，因为这些变化可能表明儿童需要帮助或保护。

5. 强迫婚姻/绑架：在某些文化中，强迫婚姻仍然被认为是可接受的。任何工作人员如果认为有儿童可能面临此类虐待的风险，应立即向儿童保护小组的成员报告。

附件D：儿童保护：披露和报告流程图



谁是儿童保护人员？

- 指定保障负责人总领导 (Executive DSL) :
Rosie Mccoll 女士 (校長) rmccoll@harrowschool.hk; 手机: 95414001
- 指定保障负责人 (DSL) :
中学部:
Laura Yandell 女士 (資深副校長, 全校) lyandell@harrowschool.hk
小学部:
Brendan Shanahan先生 (小學部校長) bshanahan@harrowschool.hk
- 副指定保障负责人 (DDSLs) :
Lauren Berner女士 (小学部副校长 (关怀、课外活动及组织))
lberner@harrowschool.hk
Kim Gration女士 (助理校长 (初中学部, 关怀及健康))
kgration@harrowschool.hk
Naina Nightingale女士 (助理校长 (高中学部, 关怀及健康))
nnightingale@harrowschool.hk
Wylie Chan女士 (中学部校务处经理及中学部资深领导团队之个人助理)
wchan@harrowschool.hk

Ginny Wong女士（小學部校务处经理及小学校部校长之个人助理） gwong@harrowschool.hk

- **负责儿童保护之校董：**

Ahmed Hussain博士， ahussain@aisl-edu.com

- **学校心理学家：**

Rachel Gregory博士， rgregory@harrowschool.hk

附件E： 儿童保护： 针对教职员/志愿者的指控流程图

如果你意识到一名教职员/志愿者可能有

- 以伤害或可能伤害儿童的方式行事
- 可能犯下针对儿童或与儿童有关的刑事犯罪; 或
- 以显示他们对儿童构成伤害风险的方式行事

或

一名年轻人披露了一名教职员/志愿者的虐待或疏忽照顾

- 聆听并相信 - 认真对待指控。
- 支持他们表现勇敢。
- 永远不要承诺保密。

你必须

立即向负责人报告

- 任何针对教职员/志愿者的担忧或指控， 均须直接向校长报告。
- 任何针对校长的担忧或指控， 均必须直接报告给负责儿童保护的校董。

校长：

Rosie McColl女士 rmccoll@harrowschool.hk

负责儿童保护之校董：

Ahmed Hussain博士 ahussain@harrowis.com

HARROW HONG KONG
SAFEGUARDING CONCERN FORM

附件F

学生全名及班级/社

年龄和出生日期

用儿童自己的说话，如实描述发生的事情、地点和在场人士。任何意见都必须详细解释。注意，不要提问引导性问题。

所采取的行动

报告此问题的教职员之姓名和签署

职位

日期和时间

提供给指定总保障负责人的日期记录表

指定总保障负责人的姓名和签署，以确认收妥

Rosie McColl （校长）

签署：

日期和时间

附件G：哈罗香港儿童保护及保障-教职员的行为准则

15. 哈罗香港致力于学生的安全和保护。本行为准则适用于学校的所有教职员、外部承包商、住客、志愿者和访客，以及以直接和/或无人监督的身份与学生互动之人员。
16. 本行为准则适用于代表哈罗香港行事的人员其公共和私人行为。我们必须始终认知，有关伴随我们工作在其职业和私人生活中所承担之责任。
17. 我们应认知，有关自己和其他人的脆弱性，尤其是单独与学生一起工作时，并特别认知到我们有责任在此类互动中，保持身体、情绪和性方面的界线。我们必须避免与由自己为其负责的人士，发生任何隐蔽或公开的性行为。这包括利用、虐待或骚扰的言语或手势，以及身体接触。
18. 在接触学生前，我们必须谨慎行事，并了解身体接触可能被感知或接受的方式，以及这种接触是否适当。
19. 哈罗香港的教职员和志愿者在任何时候，均被禁止对儿童进行体罚。
20. 与学生的身体接触可能会被对方和观察者所误解，只有在完全与性无关，并在其他方面均为适当的情况下才应该发生，且永远不要私下进行。
21. 教职员必须将低程度问题向人力资源主管报告。
22. 与学生的一对一会面最好在公共场所进行；在可以（或正在）观察互动的房间里进行；或者在一个开着门或有玻璃窗的房间里进行，而另一名教职员会收到其会面通知。教职员公寓不应招待学生。
23. 当有证据表明或有合理理由怀疑学生以任何方式受到虐待时，我们无论如何必须进行干预。如《哈罗香港儿童保护和保障政策》所述，必须向哈罗香港指定保障负责人报告涉嫌虐待或疏忽照顾的行为。
24. 在监督学生或以其他方式与学生一起工作时，任何员工或访客均不得不适当地消费、使用酒精和/或药物或受其影响。哈罗香港校园为禁烟区，无论在校外、监督学生或以其他方式与学生一起工作时，还是在校内的任何时候，均不得使用任何形式的烟草或电子烟。
25. 成人绝不应给学生任何不适当的药物、（电子）香烟、图像或阅读材料。
26. 未经其直属经理许可，并根据学校的礼品政策，员工和志愿者不得接受学生的礼物。
27. 与学生的交流受《哈罗香港教职员 ICT 可接受使用政策》的约束：所有教职员均应熟悉其内容。
28. 如教职员发现学生可能对自己有所迷恋，必须立即通知他们的直属经理。

在签署本声明时，本人承认已阅读或获悉《哈罗香港的儿童保护和保障政策》，并同意本人在哈罗香港的期间，本人绝不能：

- 击打、物理袭击或在身体或心理上虐待任何儿童；
- 亦从心理学角度而言，以某种方式对待任何儿童，致使可能对他们的发展产生负面影响，包括他们的社交和关系发展；
- 以给在场任何儿童树立负面榜样的方式行事；
- 与哈罗香港的任何现任学生（任何年龄）或任何未满21岁的前哈罗学生进行性活动或发生性关系，无论成年年龄的定义或同意的法律认可方式如何在不同的国家有别——甚或相信儿童较自己他/她年长，事实上，以上均不能被认为是可以接受的辩护理由；
- 与儿童有任何可被视为利用、粗暴对待或虐待的关系；
- 以可能虐待儿童或使儿童面临利用、粗暴对待或虐待风险的方式行事；
- 使用语言（线上/面对面），提出不恰当、冒犯性或辱骂性的建议或要约；
- 以不恰当或性挑逗的方式行事（线上、面对面或任何其他媒介）；
- 使用在线个人通讯（电子邮件、聊天平台、社交网络等）与哈罗香港儿童建立或进行「持续」联系——只能使用组织所了解的专业在线工具和环境；
- 在任何与学校相关的活动中，与儿童睡在同一个密闭空间，例如同一个房间、帐篷或床上；
- 为儿童作出他们自己可以完成的个人性质之事情；
- 在您的上级经理不知情的情况下，向儿童提供金钱、物品或其他利益；
- 未经家长/管理层明确许可，或不在紧急情况下，用个人车辆接送学生。
- 纵容或参与儿童的非法、虐待或危及他们安全的行为；
- 以旨在羞辱、侮辱、轻视，或贬低儿童的方式行事，或以其他方式实施任何形式的情绪虐待；
- 歧视、区别对待或偏袒特定儿童而排斥其他儿童。

此列表并非详尽无遗，或排除其他可能。基本原则是您必须避免可能对儿童不当或有潜在虐待行为的行为。

同样重要的是，哈罗香港的所有教职员和相连群体在与儿童有任何接触时：

- 快速识别可能使儿童处于危险之中的情况，并知道如何处理此类情况；
- 必须根据一般程序和本行为准则，报告对可能虐待儿童的任何疑虑、怀疑或确定性；
- 以在组织工作时和在工作场所中，尽量减少任何风险；
- 与儿童一起工作时，始终尽可能让其他成年人看到；
- 确保教职员对待自己工作方式有其责任感，致使任何不当或可能导致虐待儿童的行为或行为，均不会被忽视或被容忍；

- 保持最高的个人和专业纪律和诚信;
- 尊重儿童的权利, 以公平和诚实的方式对待儿童并给予尊严和尊重。

声明

本人承诺严格遵守本《哈罗香港儿童保护与保障 - 行为准则》中的规则和准则, 作为本人为哈罗香港的学生和教职员提供服务的条件。

此外:

- 本人会遵守哈罗香港的强制举报规定, 举报涉嫌虐待儿童的行为。
- 本人将全力配合任何虐待学生的调查。
- 本人理解学校的社会愿景声明, 并同意在本人与学校相关的所有来往中支持它: 「一个充满爱心、相互尊重的社群, 让每一个人均能茁壮成长。」
- 本人已阅读并理解以下文件/政策: 《教职员 ICT 可接受使用政策》、《教师 and 行政人员的专业指引》以及《反欺凌和骚扰政策》。
- 我声明我没有受到与儿童工作、性相关犯罪、不道德行为、虐待行为或任何其他不当行为有关的指控、调查、警告、定罪或任何其他行动, 如果在我工作期间的任何时候发生变化, 我将立即通知学校。
- 我了解, 如果我涉嫌虐待行为并接受调查, 调查期间我可能需要离开寄宿所居住。
- 本人确认本人已发布、阅读并理解英国教育部2025年发布的《保障儿童在教育中的安全》之第一部分(如不需与儿童直接接触的教职员, 则为附件A)。
- 我曾出席或曾阅览指定保障负责人在校内的最新汇报。

本人签署确认本人已阅读此《哈罗香港儿童保护与保障 - 行为准则》, 并且作为工作上会与学生共处的人士, 本人同意遵守这些标准。本人我明白, 任何不符合本行为准则的行为或未能采取本行为准则规定的行动, 均可能导致纪律处分, 包括被哈罗香港解雇。

名字: _____ 职务 / 职位: _____

签署: _____ 日期: _____

签署后, 应将此表交回给人力资源部, 并将副本保存在员工人事档案中



SEXUAL BEHAVIOURS

●●● TRAFFIC LIGHT TOOL

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

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

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 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.

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.

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.

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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United Company registered in England and Wales, number 2466940. Registered Charity in England and Wales, number 700315. Registered Charity in Scotland, number SC045768.

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.

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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
- taking 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

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