

# **Situation Analysis Study on Child Safeguarding Policy**

*(Study with sports organisations in HKSAR)*

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**Research summary**

**July 2020**

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## FOREWORD

Plan International Hong Kong is committed to realising children’s rights as enshrined in the United Nations Convention on the Rights of the Child (UNCRC)—including their rights to protection from abuse and exploitation (*Article 19*).

Child Safeguarding is a new boarder approach to preventing child maltreatment. Instead of only protecting individual children identified as suffering or at risk of suffering significant harm, child safeguarding aims at providing preventative and all-encompassing solution to prevent maltreatment to all children.<sup>1</sup> While many child-related organisations have frequent contact with children in their daily operation, we believe holding these organisations accountable, upholding the primary principal of safeguarding children’s best interest, is important in creating a safe and enabling environment for children’s wellness and development.

At the heart of Child Safeguarding Policy is the ‘**do-no-harm**’ principle<sup>2</sup>. It means any organisation or agency working with children has a moral and legal responsibility to take all reasonable measures to ensure that the risks of harm (both intentional and unintentional) to children's welfare are minimised, and that children are not exposed to harm and abuse as a result of their contact with the organisation, its staff, its representatives, or their participation in the organisation’s projects and activities or as a result of any operational processes and activities. Furthermore, where there are concerns about children’s welfare, appropriate actions should be taken to address those concerns.

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<sup>1</sup> Gilbert, N. (2012). A comparative study of child welfare systems: Abstract orientations and concrete results. *Children and Youth Services Review*, 34, 532–536.

<sup>2</sup> Keeping Children Safe. (2014). *Child Safeguarding Standards and How to Implement them*. Retrieved from <https://www.keepingchildrensafe.org.uk/how-we-keep-children-safe/capacity-building/resources/child-safeguarding-standards-and-how-implement>

## OVERVIEW OF CHILD SAFEGUARDING MEASURES IN HONG KONG

The existing child safeguarding measures in Hong Kong are largely piecemeal and inadequate. Although minimal protection is provided by the Sexual Conviction Record Check (SCRC) Scheme, and the codes of conduct of a number of child-related professionals offer some degree of guidance on the proper conduct towards children, these measures focus largely on regulating the relationship between the child-related workers and children, but not much regulations in holding the child-related organisations accountable in offering a safe environment for children in their institutions.

### (A) Minimal protection provided by Sexual Conviction Record Check

Since 2011, the Police has set up the Sexual Conviction Record Check mechanism that provides employers with access to information about the related conviction history of their prospective employees with frequent contact with children on a voluntary basis. However, the measure only serves as a secondary prevention attempt to prevent ex-sex offenders to abuse children again by holding child-related jobs and is far from a pre-emptive measure to prevent organisational sexual abuse from happening in the first place.

### (B) Code of conduct governing different child-related sectors

Different national sports associations have slightly different codes of conduct for coaches. However, whether different forms of child abuse would result in disciplinary action varies from sector to sector, and their standards on inappropriate acts towards children might differ.

However, child maltreatment does not only stem from the misbehavior of the perpetrators but is also facilitated by the lack of relevant organisational policies and practices.

**By setting up an internal Child Safeguarding Policy (CSP) within a child-related organisation and cultivating a child safeguarding culture, we can ensure every aspect of the organisation's internal practices are all standardised, transparent and consistent in keeping children safe.**

In recent years, the local sports sector has been in the vanguard of promoting child safeguarding among child-related organisations. In 2017, Sports Federation & Olympic Committee of Hong Kong China launched the guideline “Safeguarding athletes from harassment and abuse in sport” to all national sports associations in Hong Kong in the hopes of creating a safe environment for athletes. To limit the scope of our research, we chose to focus on sports organisations as our first targets in conducting a landscape research of Child Safeguarding Policy in Hong Kong.

## **PURPOSE OF THE STUDY**

From November 2019 to March 2020, Plan International Hong Kong has commissioned Policy 21 Hong Kong to conduct the first-ever landscape research on the implementation of Child Safeguarding Policy (CSP) in local sports organisations.

1. To understand the situation of how sports organisations implement measures to safeguard children in their institutions.
2. To analyse the factors influencing the level of CSP implementation in sports organisations

This research summary will outline the key findings of the research and propose recommendations to facilitate the adoption of CSP in Hong Kong.

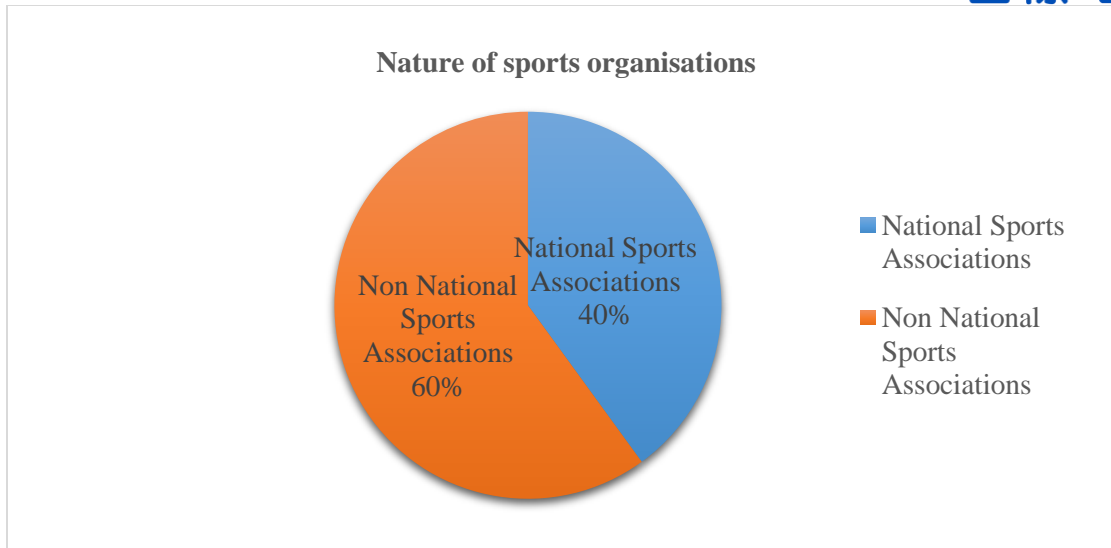
## **METHODOLOGY**

A mixed method approach involving both quantitative and qualitative research methodology was adopted in this research.

Total population sampling is adopted for quantitative data collection. In order to understand the implementation of CSP comprehensively, each organisation was invited to complete 2 questionnaires (one from management staff and one from frontline staff).

From November 2019 to March 2020, a total of 501 sports organisations were invited to participate in the study, of which 33 questionnaires (from 30 organisations) and 10 in-depth interviews were completed.

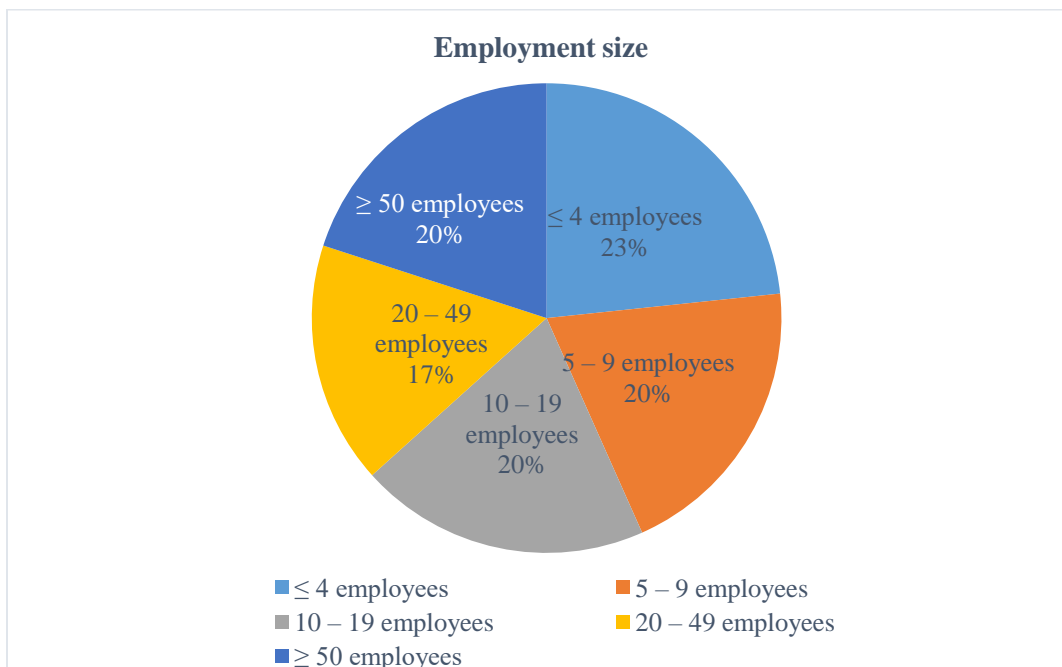
For those organisations which completed two questionnaires, the final rating of the response for each question would be the average of the rating of frontline staff and the management staff. However, regarding questions related to the level of CSP implementation, only the rating given by management staff will be taken into account.



Graph 1.1: Organisations by nature of sports organisations

(Note: National Sports Associations provide registration and training of coaches and hold local or international competitions for the sports sector apart from providing sports training for children.)

As illustrated in Graph 1.2, the 30 organisations were comprised of organisations with different employment size.



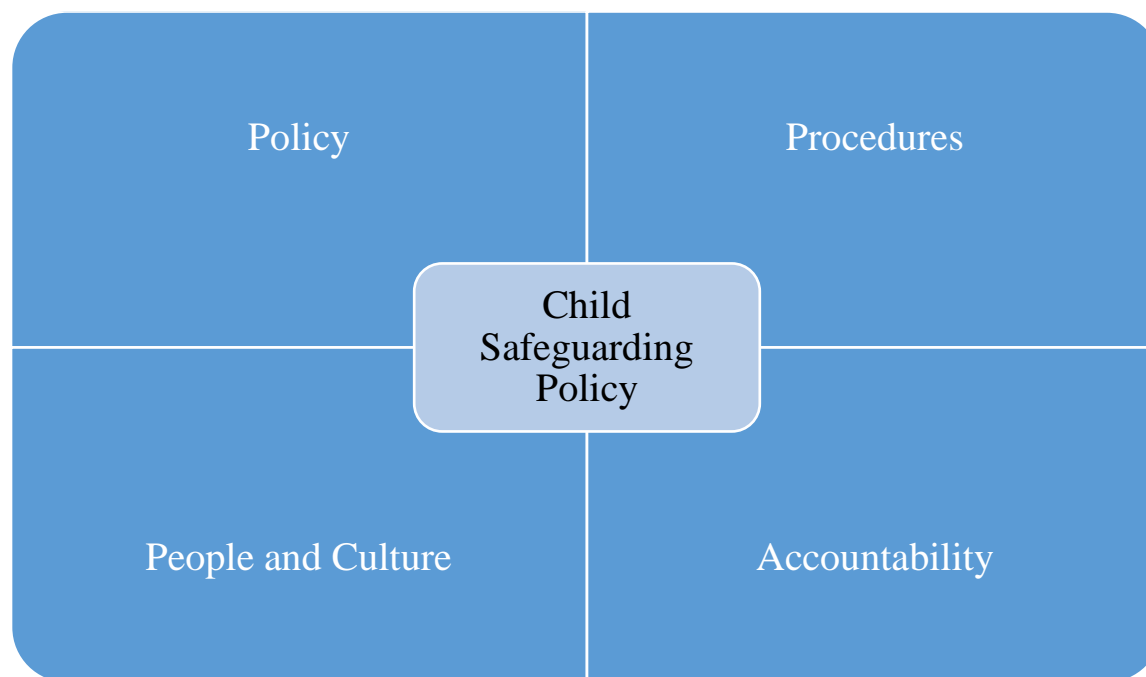
Graph 1.2: Organisations by employment size

## KEY FINDINGS

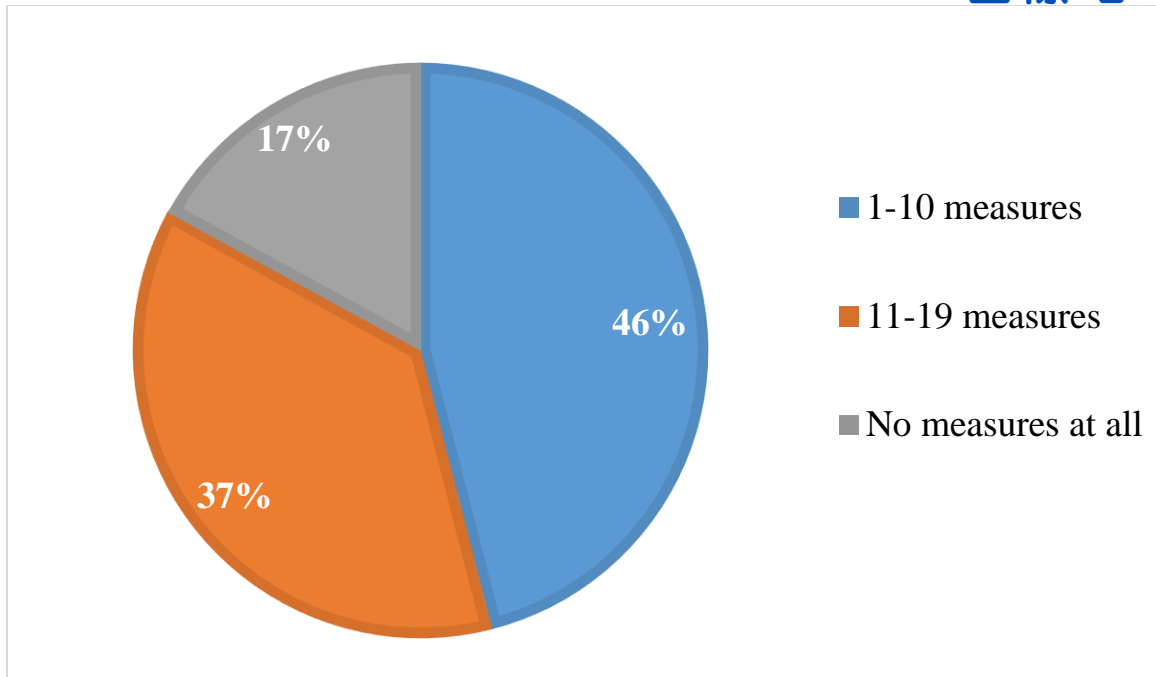
### *A. Situation of Child Safeguarding Policy Implementation in sports organisations*

As there are no official Child Safeguarding Policy regulations or framework established in Hong Kong, a Child Safeguarding Policy framework with 4 components and 20 child safeguarding standards has been proposed in the study following a comprehensive literature review covering the relevant legal requirements and guidelines from other jurisdictions, including Australia and England. The 4 components of Child Safeguarding Policy are “Policy”, “Procedures”, “People and Culture”, and “Accountability”. For details, please see Appendix I.

Details of the findings are shown in Graph 2.2 to Graph 2.5.

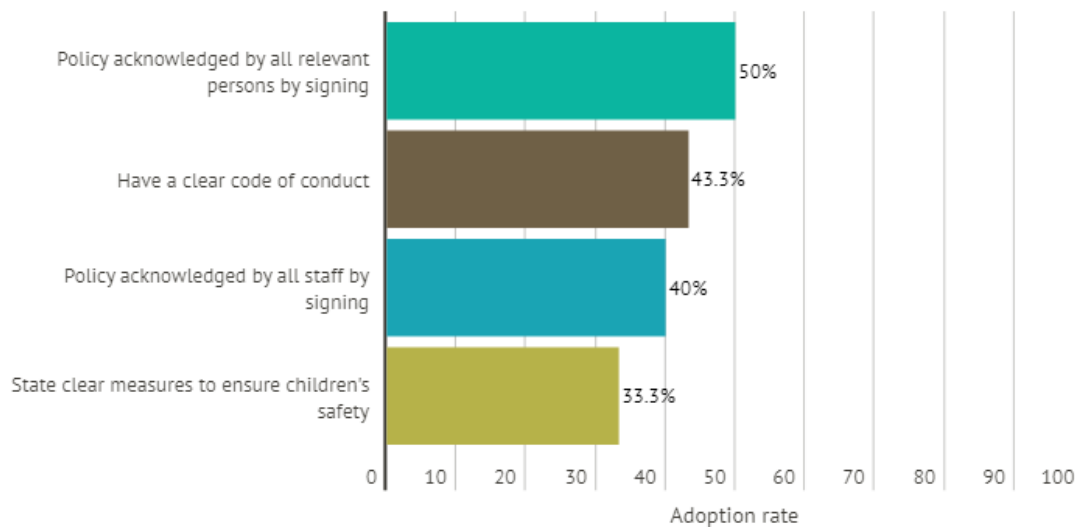


As illustrated in Graph 2.1, the overall implementation of CSP among sports organisations is not prevalent. 17% of the organisations had none of the child safeguarding measures in place, 46% implemented only half or fewer than half of the 20 measures, and none of the organisations implemented all 20 measures.



Graph 2.1: Overall implementation of Child Safeguarding Policy

### 1. Implementation of 'Policy'

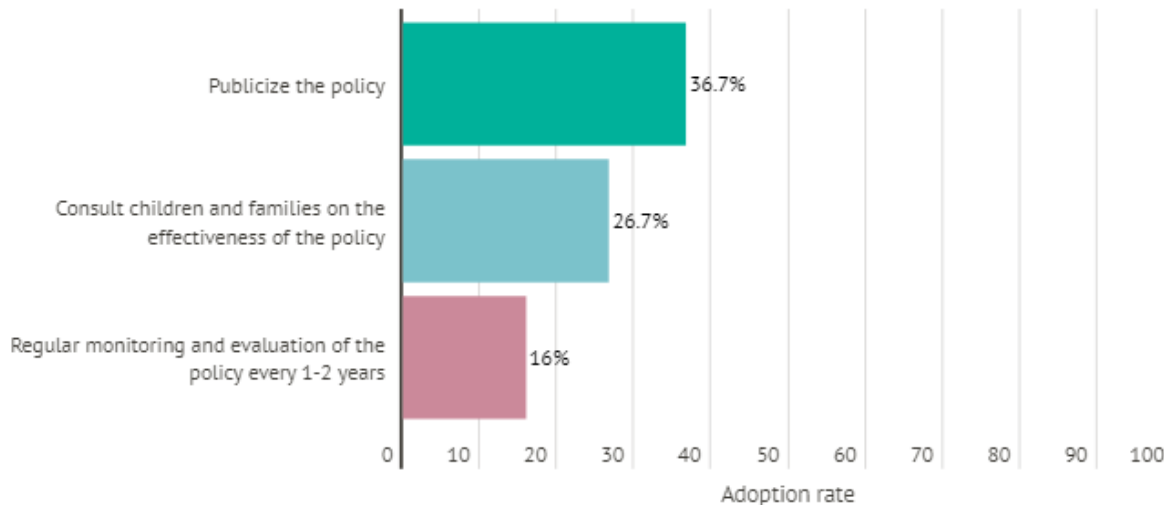


Graph 2.2: Implementation level of 'Policy'

Apart from having a clear code of conduct, it seems that most respondent organisations have not set other clear measures to ensure children's safety, with only 33.3% of organisations clearly stating measures to guarantee children's safety in the organisation.



## 2. Implementation of ‘Accountability’

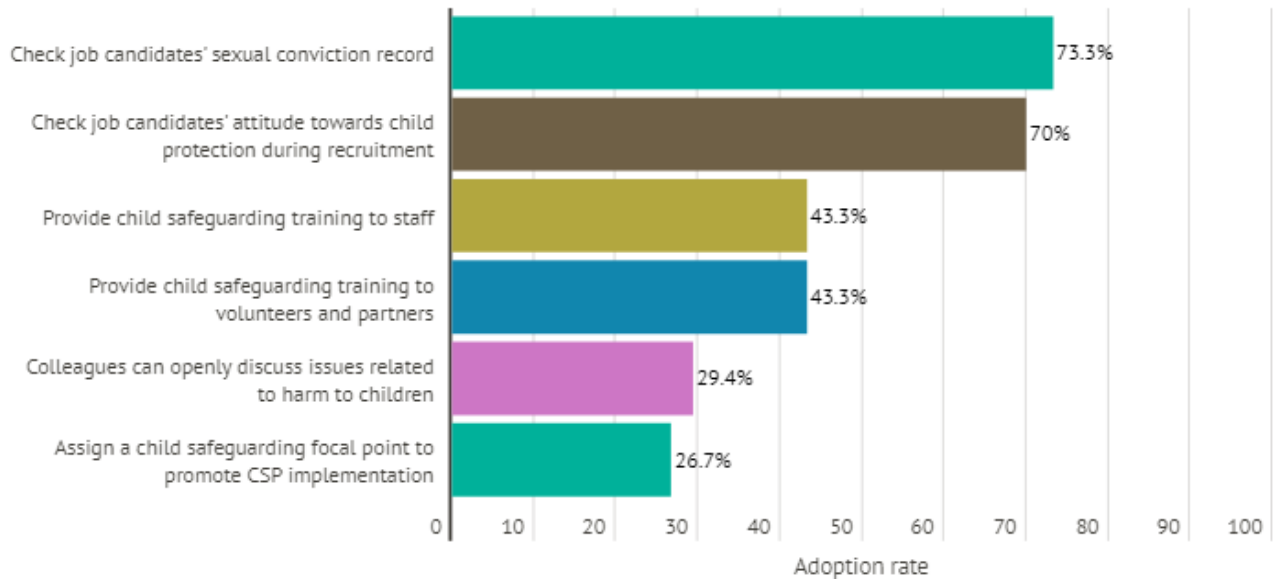


Graph 2.3: Implementation level of ‘Accountability’

The low implementation rate of ‘publicising the policy’ (36.7%) and ‘consulting children and family on the effectiveness of the policy’ (26.7%) indicates that even if the organisations do have some regulations or policy on child safeguarding, they mostly treat it as an internal policy without seeing the need to share it with parents or children or consult them about its effectiveness. It shows that the organisations generally do not see ‘accountability to children and parents’ as their top priority in operation.

Also, only 16% of the respondent organisations had a regular monitoring mechanism to evaluate the effectiveness of their child safeguarding policy or practices. 28% of the sports organisations expressed that they would evaluate their policy depending on the frequency of child abuse incidents, showing that the monitoring mechanism of the sports organisations is generally reactive upon child abuse incidents rather than proactive to prevent child abuse cases from happening in the first place.

### 3. Implementation of ‘People and Culture’

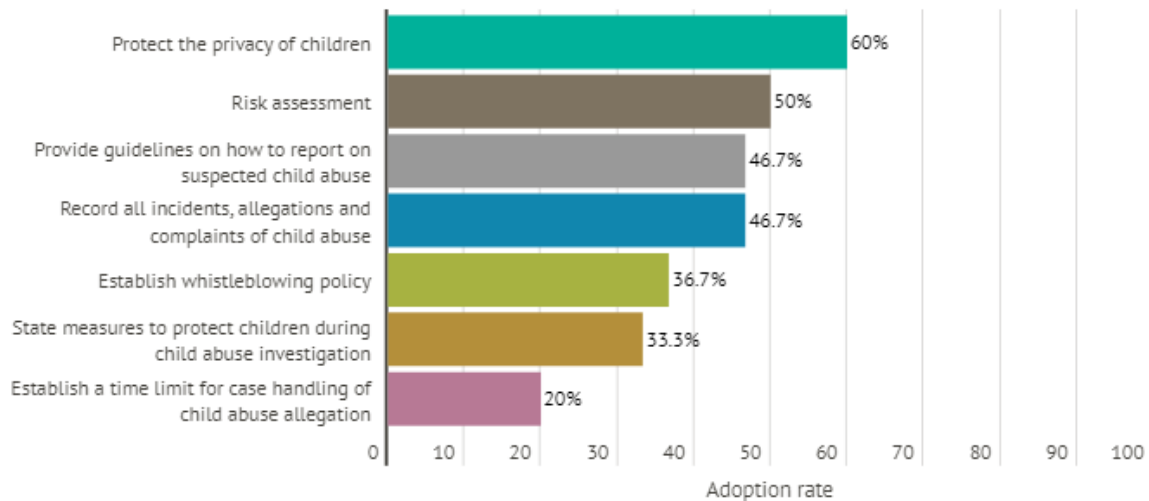


Graph 2.4: Implementation level of ‘People and Culture’

Most respondent sports organisations had taken child safeguarding measures during recruitment—73% of the organisations checked job candidates’ sexual conviction record and 70% evaluated the candidates’ attitude towards child protection during recruitment. However, it seems that many organisations do not pay much attention to establish child safeguarding capacity and culture. Only 43.3% of the organisations provided child safeguarding training to relevant workers. As known in in-depth interviews, organisations which provided ‘child safeguarding training’ to relevant persons usually incorporated certain ‘child safeguarding messages’ in regular coach meetings or staff meetings, instead of having a regular and comprehensive training program for all staff.

Also, only 29.4% of the respondents felt that they could openly discuss issues related to harm to children in the organisation, and 49% were not sure whether they could have such open discussion, showing that it might be a taboo to talk about harm to children in sports organisations, which might pose an obstacle to addressing poor practices or institutional child abuse in the organisation.

#### 4. Implementation of 'Procedures'



Graph 2.5: Implementation level of 'Procedures'

60% of the sports organisations had measures to protect the privacy of children, like seeking consent from the parents and children before publicising their personal information or pictures, indicating that quite a lot of sports organisations take the privacy of children seriously in their organisation.

However, many sports organisations do not have a robust mechanism to deal with child abuse allegations and complaints. It is noteworthy that only 36.7% of the organisations had established whistleblowing policy, an important internal policy that provides guarantee to employees that reports of suspected child abuse in the institution will not lead to retribution and discrimination. As the results show, only 20% of the organisations had established a response-timeline for case handling for any child abuse allegations. With only 33.3% organisations having stated measures to protect children during child abuse investigation, the results indicate that the alleged child abuser might still have access to children for a prolonged period when the suspected child abuse case is still being handled, posing dangers to the victim and other children in the organisation.

## B. What motivates and hinders Child Safeguarding Policy Implementation?

The formation of a policy in human service organization usually has a great deal to do with the way it is viewed by its staff. Formal policy change and a long-term practice change are impacted by the awareness, knowledge and the staff’s motivation in making this change, and whether the change will bring in any positive impact to the well-being of staff and children.

In the research, besides understanding the implementation level of CSP in sports organisations, we also aim to analyse the factors behind, which include awareness and knowledge of child abuse, attitude towards CSP and other motivators and barriers in implementing CSP measures.

### 1. The CSP is well received by the sports organisations.

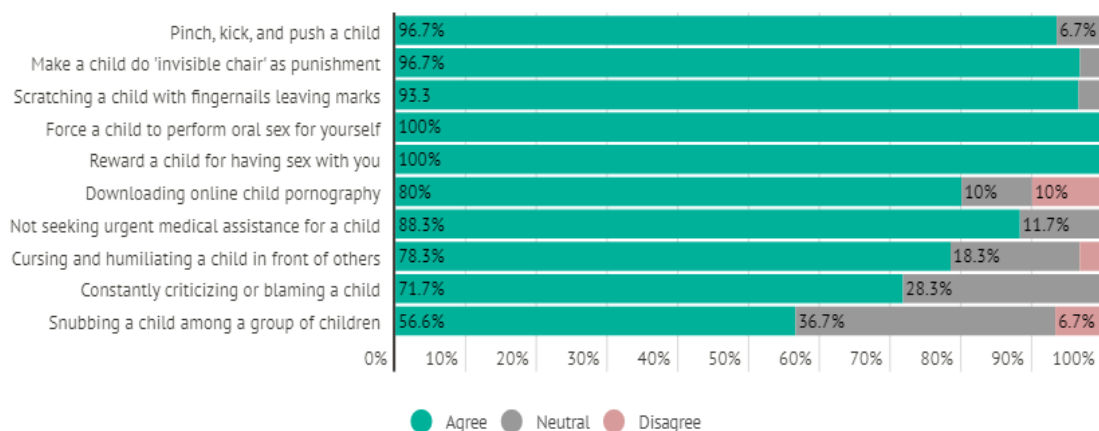
It is encouraging to learn that many staff in sports organisations recognised the positive impacts of implementing Child Safeguarding Policy in their organisation.

- 80% thought that the CSP allowed staff to understand the appropriate and inappropriate behavior towards children, so as to reduce incidents inducing harm to children.
- 73.3 % agreed ‘exercising CSP can improve image of organisation’ and 75% agreed ‘exercising CSP can protect the organisaitons’ reputation’.
- 71.6% agreed ‘carrying out CSP helps enhance mutual respect and understanding between service targets and staff’.

However, as the results show, positive attitudes do not translate into high adoption of the CSP in sports organisations. The following are some of the factors hindering Child Safeguarding Policy implementation.

### 2. Lack of awareness on ‘what constitutes child abuse’ and ‘how it might occur’

#### 2.1 Generally high awareness of child abuse, but relatively low awareness of ‘psychological abuse’



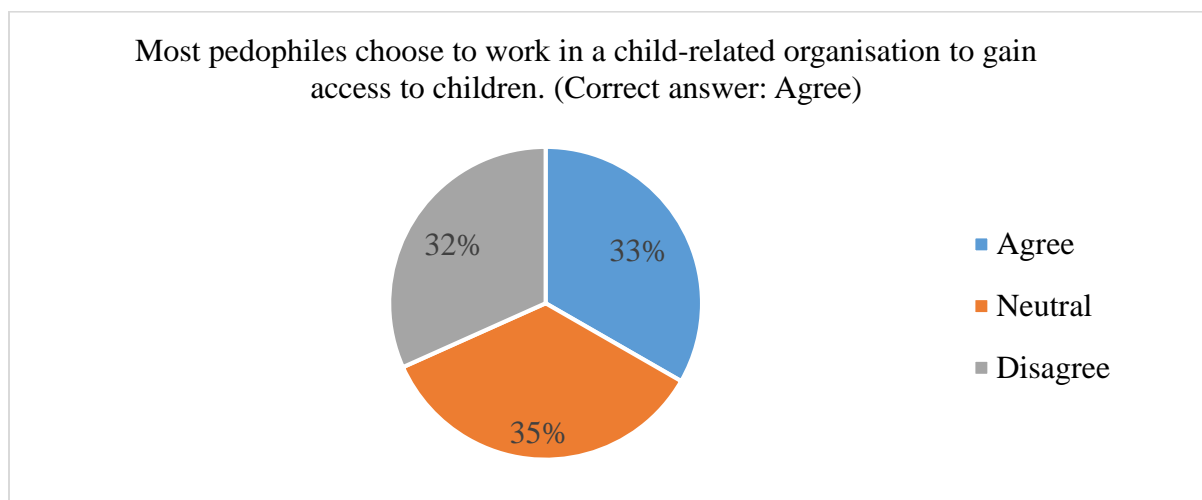
Graph 3.1: ‘What acts constitute child abuse?’ (Grouped data from 5 point-scale)

Many respondents show lower awareness on psychological abuse as compared to other kinds of child abuse. Respondents were asked to indicate the extent to which they agreed different kinds of act constitute child abuse, by commenting on 10 statements describing acts related to physical abuse, sexual abuse, neglect and psychological abuse (Graph 3.5). Results show that the mean scores on different types of child abuse are sexual abuse (4.6), physical abuse (4.4), neglect (4.0) and psychological abuse (3.9), with higher scores indicating the respondents have higher agreement on ‘these corresponding acts constitute child abuse’ on average.

## 2.2 Lack of awareness on how to identify child abuse

Questions have been asked to examine the awareness and knowledge related to child abuse and potential risks of harm in organisations. Some of the questions are ‘Most pedophiles choose to work in a child-related organisation to gain access to children’ (correct answer is ‘Yes’), and ‘Usually child abuse would leave wounds or scars on the child’ (correct answer is ‘No’).

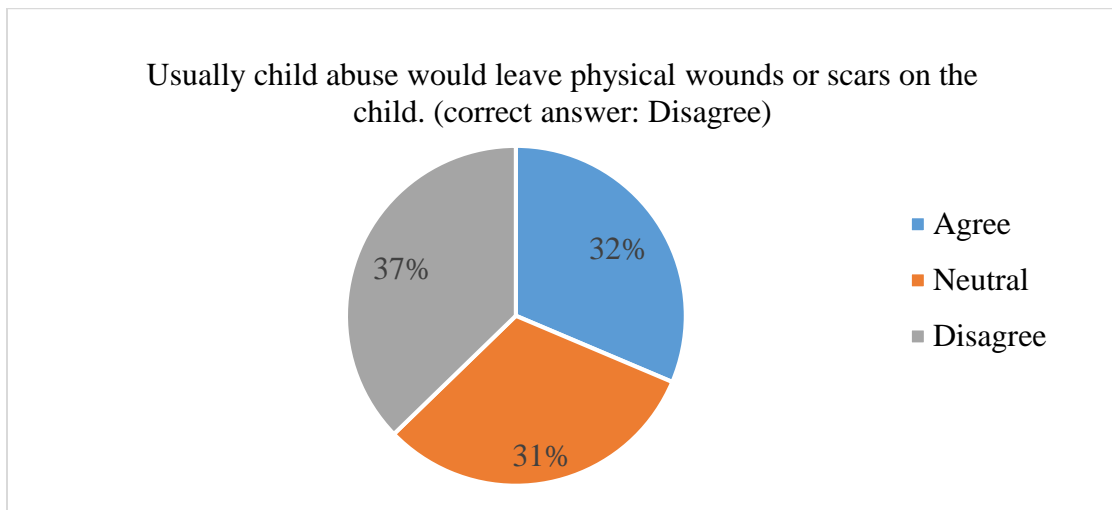
According to Graph 3.2, however, only 33% of the respondents knew that ‘most pedophiles choose to work in a child-related organisation to gain access to children’, showing that many sports organisations might be unaware of the risk of their organisation being targeted by people who are motivated to harm children.<sup>3</sup>



Graph 3.2: Percentage of organisations agreeing with the statement about ways to identify child abuse “*Most pedophiles choose to work in a child-related organisation to gain access to children.*” (Grouped data from 5 point-scale)

<sup>3</sup> Research find from *Joe Sullivan, Anthony Beech (2004) Child Abuse Review, and BASPCAN* suggests that 57.5% of the sex offenders chose their career in order to gain access to children.

Also, only 37% of the respondents understood that child abuse would not leave physical wounds or scars on the child, indicating that workers in sports organisations might not be able to identify some types of child abuse.



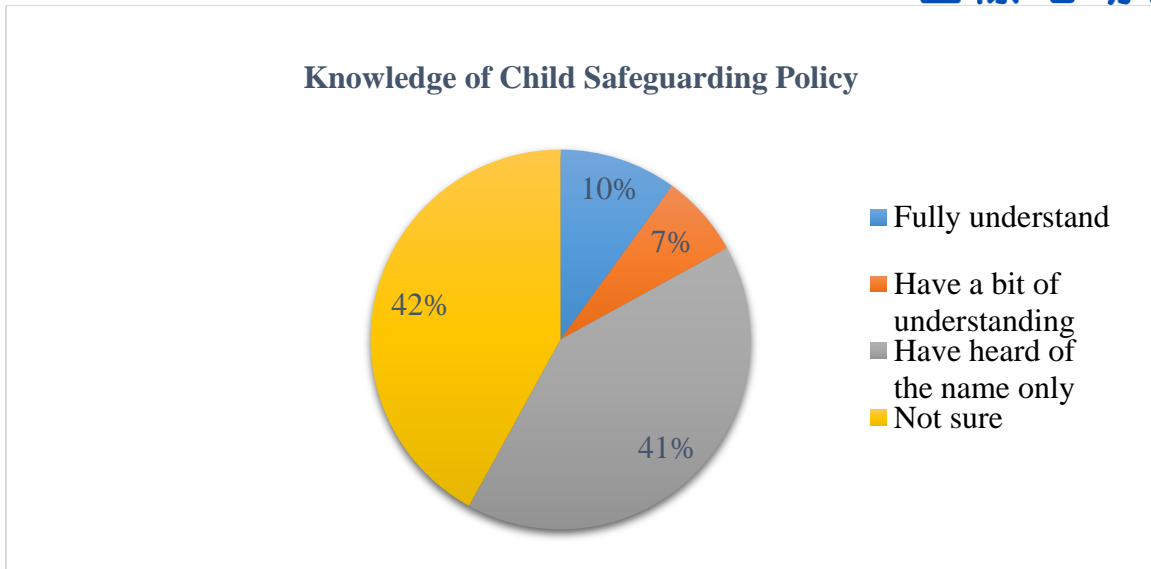
Graph 3.3: Statement about child abuse: *Usually child abuse would leave wounds or scars on the child.* (Grouped data from 5 point-scale)

The above results show that lack of awareness on ‘how to identify child abuse’ may be one of the reasons why organisations do not consider it necessary or urgent to implement child safeguarding policy to prevent child abuse from happening in the organisation in the first place.

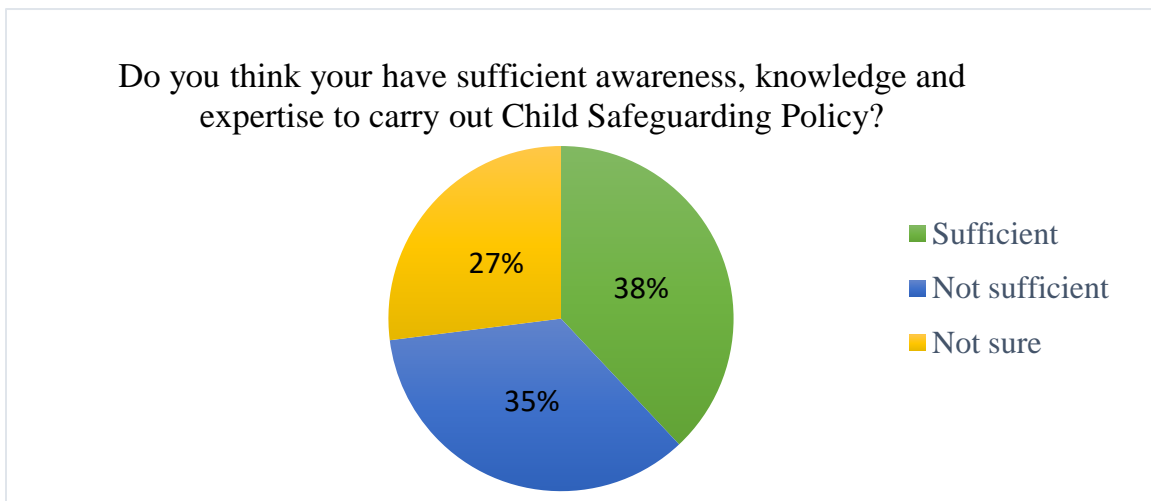
### 3. *Unfamiliarity with child safeguarding procedures and requirements*

Unfamiliarity with possible child safeguarding measures, children’s rights, and local child safeguarding procedures might also be a barrier against CSP implementation in sports organisations.

Although sports organisations do exercise measures to reduce risk to children in the institution, the term ‘child safeguarding’ is not commonly recognised amongst practitioners. As shown in Graph 3.4 and 3.5, only about 17% of the respondent organisations understood or learnt about Child Safeguarding Policy, and 62% of them thought they did not have or were not sure if they had sufficient knowledge to implement CSP, reflecting that sports organisations have low awareness of CSP and therefore have little knowledge or experience implementing child safeguarding measures in the institution.

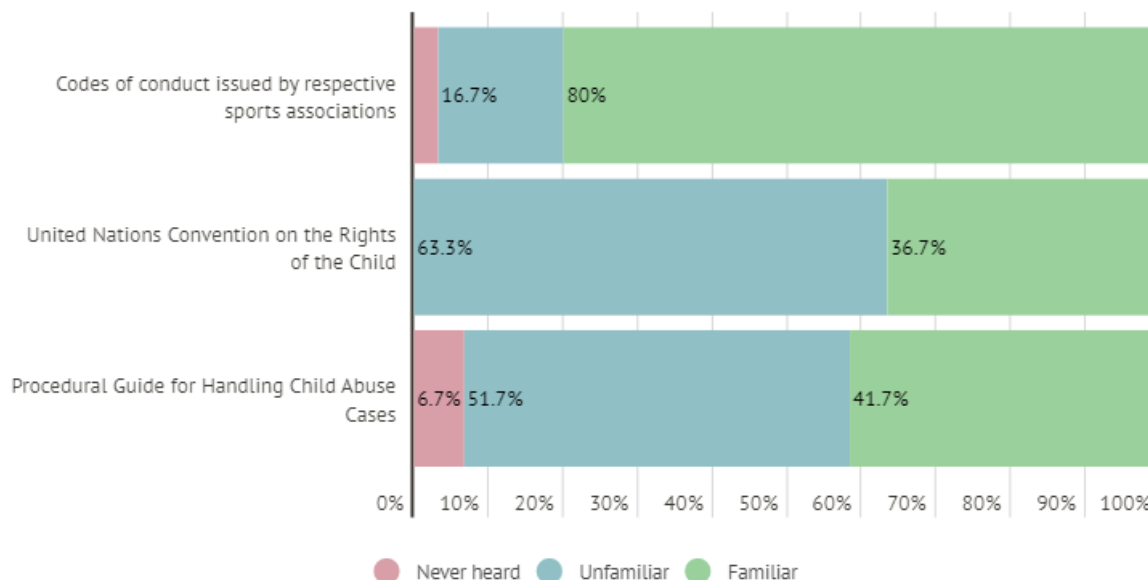


Graph 3.4: Knowledge of Child Safeguarding Policy



Graph 3.5: Perceived efficacy to implement Child Safeguarding Policy in the organisation

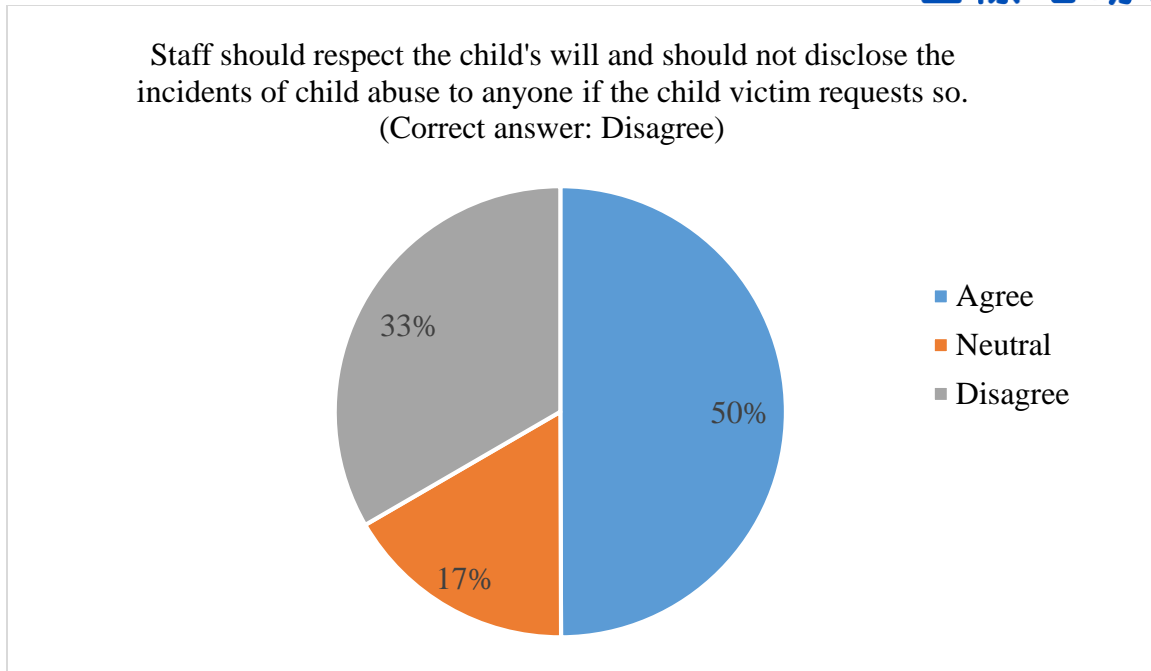
Although most respondent organisations are familiar with the codes of conduct issued by respective national sports associations, it seems that their knowledge on child protection does not go beyond the guidelines they get from their own sector. 63.3% of them were unfamiliar with the United Nations Convention on the Rights of the Child, while 58.4% were unfamiliar or never heard of the ‘Procedural Guide for Handling Child Abuse Cases’. These results indicate that workers in sports organisations might not have adequate understanding on children’s rights and relevant procedures on handling child abuse cases. Details are shown in Graph 3.6.



Graph 3.6: Familiarity with local child safeguarding procedures (Grouped data from 4 point-scale)

A question was asked to test the participants’ knowledge on reporting mechanism in Hong Kong. The question was ‘Staff should respect the child’s will and should not disclose the incidents of child abuse to anyone if the child victim requests so’ (correct answer is ‘No’). A majority of respondents (50%) believed that ‘staff should respect the child’s will and should not disclose the incidents of child abuse to anyone if the child victim requests so’ (Graph 3.7). This also reinforces the findings that many sports organisations lack the knowledge on the operation of local procedures and reporting mechanisms on suspected child abuse cases.





Graph 3.7: Statement about child abuse: *Staff should respect the child's will and should not disclose the incidents of child abuse to anyone if the child victim requests so.* (Grouped data from 5 point-scale)

## LIMITATIONS ON THE RESEARCH

Though a total population sampling is adopted for quantitative data collection, the response rate is low—only 6% of invitations responded which may render nonresponse bias. With such a low response rate, and the low awareness of Child Safeguarding Policy among the sports organisations studied, it is possible that organisations which responded with interest to participate in the study might be fundamentally different from those who did not (e.g. having more interest or implementation of CSP), and therefore might slightly overestimate the interest and implementation level of CSP in the sports sector.

Meanwhile, the small sample size (30 organisations) makes it impossible to conduct sub-group analysis to understand how some demographic factors might affect the implementation of Child Safeguarding Policy (e.g. employment size, nature of sports organisations). Therefore, caution should be taken to generalise the results in this study further to the entire sports sector.

## RECOMMENDATIONS

The government and the society should jointly create an enabling environment for sports organisations and other child-related institutions to adopt proactive and effective child safeguarding practices using the following measures:

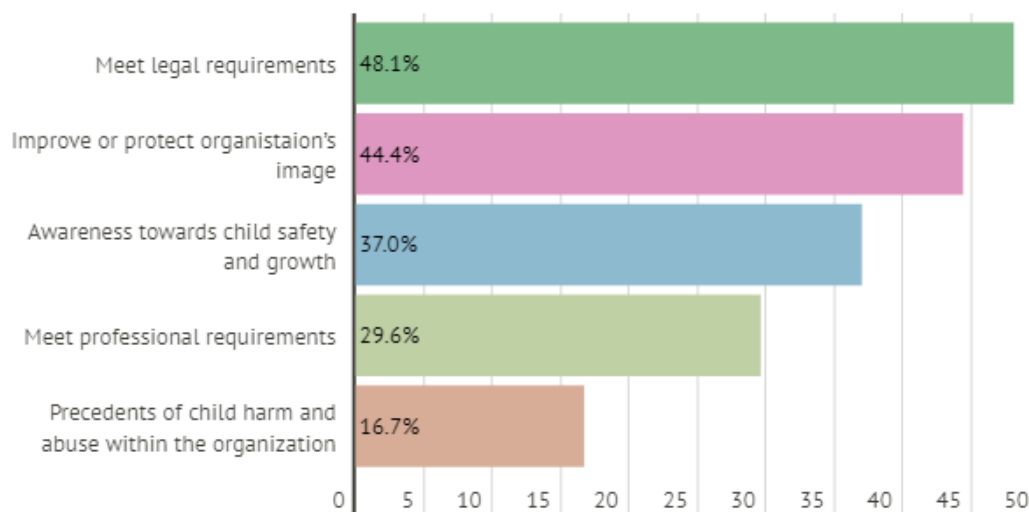
### *1. Establish a set of minimum child safeguarding standards for the sports sector*

With mandatory benchmarks and structured framework of agreed good practice to follow, the sports organisations can prioritise and dedicate resources to child safeguarding, and ensure consistency of child safeguarding standards across different sports organisations, protecting the safety of children and the reputation of staff and organisations.

To incorporate child safeguarding standards into the sports sector in particular, both the government and the sports sector could play a leading role in facilitating the implementation of child safeguarding policy by the following measures:

- 1) Funding bodies like Leisure and Cultural Services Department and The Hong Kong Jockey Club should incorporate child safeguarding standards into its funding requirements in funding for sports institutions
- 2) As sectoral leaders, Sports Federation & Olympic Committee of Hong Kong China and National Sports Associations should facilitate sports organisations to establish their own Child Safeguarding Policy by setting up ‘safeguarding procedural guidelines’ for coaches of different types of sports.
- 3) Service buyers like schools should also incorporate child safeguarding requirements into their requirements of outsourcing for any sports education activities.

According to the research results, ‘meeting legal requirements’ was the top motivating factor for formulating child safeguarding policy in sports organisations, showing that regulations would be a significant motivator for CSP adoption in sports organisations.



Graph 4.1: Motivating factors for formulating child safeguarding measures (Respondents are allowed to choose more than one option.)

2. *Provide training to foster a long-term practice change in sports organisations*

Misperceptions regarding child abuse and lack of understanding of the local child safeguarding procedures or requirements are key barriers to Child Safeguarding Policy implementation. Therefore, more training and capacity building services should be in place to enhance the organisations' capacity on safeguarding children and foster a long-term practice change that puts child safety first in institutions.

We recommend that child safeguarding training be incorporated into the curriculum of sport and physical education in university programmes to enhance the capacity of coaches in protecting children in their daily work.

3. *Provide education to children and parents*

Children are the ones who understand their situations the best, and therefore should also be engaged in their own protection so we can protect them more effectively.

Therefore, apart from enhancing child-related practitioners' sensitivity to risks of harm, children should also be equipped with education about their rights, knowledge of self-protection strategies to protect themselves and other children. Parents should also learn how to communicate with child-related organisations to protect their children from harm.



國際培幼會

Plan International Hong Kong is providing child safeguarding training and consultancy services to child-related organisations to assist them in setting up their own Child Safeguarding Policy. Want to establish your own Child Safeguarding Policy? Browse our Child Safeguarding Net at <https://csnet.plan.org.hk/> to learn more about our Child Safeguarding Policy training and consultancy service.



國際培幼會

Address: 21/F., 9 Chong Yip Street, Kwun Tong, Kowloon, Hong Kong

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Email: [KeepChildrenSafe@plan.org.hk](mailto:KeepChildrenSafe@plan.org.hk)

## Appendix I—Framework of Child Safeguarding Policy (Suggested 20 minimum child safeguarding standards)

Child Safeguarding Policy is an organisational policy which aims at minimising the risks of harm to children with its clear standards and guidelines so to ensure that the organisation has taken all reasonable measures to build a safe and friendly environment for children.

### **Policy**

1. To commit to child safeguarding and state measures to be taken to guarantee children's safety.
2. To provide a clear code of conduct describing acceptable and unacceptable behaviors.
3. Policy is applied to all staff with acknowledgement by signing.
4. Policy is applied to all relevant persons (volunteers, associates, and partners) with acknowledgement by signing.

### **Procedures**

1. To provide clear guidelines to employees, parents and children, so as to support them in reporting any suspicions of child abuse.
2. All incidents, allegations and complaints should be clearly recorded and stored.
3. To ensure children are well-protected during the investigation of child abuse allegation.
4. To establish a clear time limit on case handling for child abuse allegation.
5. To establish a whistleblowing policy where employees should be able to report abuse or suspicions of abuse without fear of retribution and discrimination in the workplace.
6. To identify, manage and minimize potential risks to children in daily operation.
7. To respect and protect the privacy of children and seek the consent of the child before distributing the child's personal information or pictures.

### **People & Culture**

1. To check job candidates' sexual conviction record.
2. To understand the candidates' attitude and ability towards child protection during recruitment (e.g. interview, background check).
3. To provide employees with regular training and support on how to maintain child safety.
4. To provide training to volunteers, partners and other persons who have contact with children to maintain child safety.
5. To assign child safeguarding responsibilities to designated staff, in order to promote CSP's implementation within the organization.
6. To cultivate a culture where workers feel that they can openly discuss issues related to harm to children.

### **Accountability**

1. Keep the Child Safeguarding Policy public and accessible to all, especially children and parents.
2. To consult children and families on reviewing the effectiveness of child safeguarding policy & procedures.
3. To conduct regular reviews on existing child safeguarding policy and procedures every 1-2 years.