

Child Protection and Safeguarding Policy

Status: Revised Policy

Date for Next Review: December 2023



ESF now provides the opportunity to provide input on ESF policies. Your suggestions can help us improve our workplace; therefore, your feedback is appreciated. To provide input, please scan the QR code or click on the link below:

http://bit.ly/esfpolicy_spga

Thank you in advance for your help!

<p>Originator:</p> <p>Director of Education ESF Centre</p> <p>Date: June 2009</p>	<p>Policy owner:</p> <p>Director of Strategic Performance and Quality Assurance ESF Centre</p>	<p>Reviewed by:</p> <p>Safeguarding and Wellbeing Adviser</p> <p>Date: November 2022</p>	<p>Approved by:</p> <p>SMT</p> <p>Date: 10 January 2023</p>
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1. Policy document review

This policy document is subject to annual review by The English Schools Foundation (ESF) to ensure its continuing suitability, adequacy and effectiveness. Areas subject to review include but are not limited to follow-up action from previous reviews, policy conformity, review of complaints, the status of corrective and preventive actions, and improvements. ESF reserves the right to amend this policy following such review.

1.1 Review status

Review No.	Summary of Revision following Review	Reviewed		Approved	
		By	Date	By	Date
1	For review by SMT	Andrew Sortwell	June 2009	SMT	22 June 2009
2	Reworking and updating of original policy	Jonathan Straker	April / May 2015	SMT	June 2015
3	Reworking and updating of original policy; addition of Child Protection Code of Conduct	Tim Conroy Stocker	June 2018	SMT	August 2018
4	Policy refresh and addition of online learning guidelines	Hodson / Caldwell	August 2020	SMT	August 2020
5	Update of Online Safeguarding provisions following comprehensive review	Hodson / Caldwell	October 2020	SMT	8 December 2020
6	Reworking and updating of policy	Tracey Chitty	November 2022	SMT	10 January 2023

2. ESF vision

ESF's vision is for every student to be the best that they can be.

3. Purpose

The English Schools Foundation upholds every child's right to learn and live in conditions that protect them from harm, promoting the optimum development of their intellectual, physical, emotional and social wellbeing. Children have a right to be protected from all forms of harm in all contexts, irrespective of social and cultural backgrounds, family context, gender, disability and age.

Child protection is everyone's responsibility; the ESF community is responsible for being preventative and proactive in all child protection matters. This policy provides clear guidelines and procedures and an ethical and practical framework to support each school in determining appropriate and effective responses, including situations where harm occurs online or through digital means. This policy adheres to the laws of Hong Kong, guidance provided by the Social Welfare Department, International laws and the United Nations Convention on the Rights of the Child.

4. Scope

This policy applies to all situations within ESF where adults work directly with students including:

- ESF Centre
- ESF Language and Learning Centre
- ESL Services
- ESF Sports
- ESF Jockey Club Sarah Roe School
- Kindergartens
- Primary schools
- Private independent schools
- Secondary schools

To ensure the protection of ESF students this policy addresses all forms of child maltreatment: neglect, physical harm, sexual abuse and psychological harm.

5. Definitions

ACA	Against Child Abuse
CAIU	Child Abuse Investigation Unit
Chief Executive	Chief Executive Officer of ESF
CPO	Child Protection Officer
CPSIT	Child Protection Special Investigation Team
DSPQA	Director of Strategic Performance and Quality Assurance
ESF	English Schools Foundation
ESL	ESF Educational Services Limited
FCPSU	Family and Child Protection Services Unit of the SWD

HOS	Head of Section in an ESF school/kindergarten
JCSRS	ESF Jockey Club Sarah Roe School
Principal	Principal of an ESF school or an ESL school or kindergarten
Senior Managers	Members of the Senior Management Team of ESF or the Management Team of ESL
Staff Member	Any employee of ESF or ESL
SLT	Senior leadership team
SWA	Safeguarding and Wellbeing Adviser
SWD	Social Welfare Department of the Hong Kong Government
SWO	Social Welfare Officer of the SWD

6. Communication and coordination in suspected child protection cases

There must be timely and clear communication and coordination within each school and the Foundation for this policy to be effective. Staff must know what constitutes maltreatment and be familiar with procedures and guidelines.

The school is part of a wider system involving other agencies such as the Social Welfare Department, doctors and police, so close and positive liaison is essential and should be based on trust and understanding of each other's roles. The school is not isolated, nor should it place itself in a position of isolation. At times, child protection issues involve more than one ESF school and open communication between principals and CPOs is essential. Understanding and communication between agencies is crucial for good child protection practices.

7. Definition of child maltreatment

Child maltreatment is broadly defined as any act of commission or omission that endangers or impairs the physical or psychological health and development of an individual under the age of 18. 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.

Such acts are not limited to a child-parent/guardian situation but include anyone entrusted with the care and control of a child, e.g. child-minders, relatives, teachers, etc. Maltreatment may also be perpetrated by someone unknown to the child.

CPOs, in consultation with the principal where appropriate, determine if there is a basis for a reasonable suspicion of maltreatment and/or harm. This assessment involves considering various factors such as the child's age, the act(s), the consequences of the act on the child, and the frequency and nature of the incident (**Appendix A**).

There are four main areas of child maltreatment: physical harm, sexual abuse, neglect and psychological harm (**Appendix A**).

7.1 Physical harm

Physical harm refers to physical injury or suffering inflicted on a child by violent or other means (e.g. punching, kicking, striking with an object, poisoning, suffocation, burning, shaking an infant, or Factitious Disorder Imposed on Another), where there is definite knowledge or reasonable suspicion that the injury has been inflicted non-accidentally.

7.2 Sexual abuse

Sexual abuse refers to forcing or enticing a child to take part in any acts of sexual exploitation or maltreatment, and the child does not consent to or fully understand or comprehend this sexual activity that occurs to them due to mental immaturity.

This sexual activity includes acts that have or do not have direct physical contact with children (e.g. rape, oral sex, procuring a child to masturbate others/expose their sexual organs, or pose in an obscene way/watch sexual activities of others, production of pornographic material, forcing a child to engage in prostitution, etc.).

Sexual abuse may be committed inside or outside the home, through social media or the internet by perpetrators acting individually or in an organised manner. It includes luring a child through rewards or other means for maltreatment, including sexual grooming, which refers to deliberately establishing a relationship or an emotional connection with a child by various means to gain their trust with an intent to sexually maltreat them (e.g. communicating with a child through a mobile phone or the internet).

Consensual sexual activity between an adolescent and another person may also involve sexual exploitation by a person who, by their characteristics, is in a position of differential power to the adolescent. Notwithstanding initial consent, sexual activities with an adolescent (regardless of any romantic relationship between them) who is coerced into certain behaviours or withdraws their consent during the act should be considered sexual abuse (**Appendix B, number 4**).

7.3 Neglect

Neglect refers to a severe or repeated pattern of lack of attention to a child's basic needs that endanger or impair the child's health or development. Neglect may be caused by the following forms:

- Physical neglect includes failure to provide necessary food/clothing/shelter, failure to prevent physical injury/suffering, lack of appropriate supervision, leaving a young child unattended, improper storage of dangerous drugs resulting in accidental ingestion by a child or allowing a child to stay in a drug-taking environment resulting in inhalation of the dangerous drugs by a child; or
- Medical neglect includes failure to provide necessary medical or mental health treatment; or
- Educational neglect includes failure to provide education or ignoring educational needs arising from a child's disability.

7.4 Psychological harm

Psychological harm refers to a repeated pattern of behaviour and/or an interaction between the carer and the child or an extreme incident that endangers or impairs the child's physical and psychological health. Examples include spurning, terrorising, isolating, exploiting/corrupting, denying emotional responsiveness,

and conveying to a child that they are worthless, flawed, unwanted or unloved. Such acts damage immediately or ultimately the behavioural, cognitive, affective, or physical functioning of the child.

8. Online safeguarding and child protection

Children can experience harm and maltreatment online by people known to them and/or by people not known to them. Online maltreatment may occur through social media, messaging apps, emails, gaming, live-streaming sites or other digital communication channels. Children who are harmed offline may be re-victimised online if their maltreatment is live-streamed or recorded and uploaded online. Online safeguarding protects children's safety when using any device over the internet.

Online harm can be categorised into four risk areas:

1. **Content** - Children of all ages can be exposed to inappropriate, harmful or illegal content (e.g. pornography, misogyny, self-harm, sexual violence etc.).
2. **Contact** - Children can be subjected to harmful online contact with other users (e.g. peer pressure, adults posing as children to groom or exploit children for sexual, criminal, financial or other purposes).
3. **Conduct** - Personal online conduct that increases the likelihood of harm (e.g. sending and receiving consensual and non-consensual photos, recordings, images; online bullying, allowing others access to locations etc.).
4. **Commerce** - Children can be both victims and perpetrators of problem commerce-based behaviour (e.g. online gambling, phishing, financial scams etc.).

(Safeguarding Network, 2022)

Schools shall be accountable for compliance with this policy in relation to their practices and engagement when engaging with students online (refer to **Appendix C** for further guidance).

9. Proactive management of child protection and safeguarding

9.1 Ongoing training

All ESF and ESL staff should have regular child protection and safeguarding training. Staff must be aware of responsibilities, procedures and referral routes.

9.2 Curriculum

Schools and kindergartens should ensure that content and activities supporting safeguarding (such as digital literacy and intelligent disobedience, relationships and sexuality education) are embedded in the curriculum. Relevant and timely learning engagements will support students to engage with relevant and important issues, concepts and skills related to safeguarding and child protection.

9.3 Annual declaration

Each staff member should complete the Annual ESF Child Protection Declaration and the ESF Staff Code of

Conduct for Child Protection and the Safeguarding of Students via Gateway before the end of August.

10. Reactive management of child protection and safeguarding

The management of a child protection issue will depend on the case's needs. This sequence of events and actions includes the following:

1. Disclosure (**Appendix D**)
2. Recording (**Appendix E**)
3. Child Protection Officer(s) coordinate response
4. Case conference to determine next steps:
 - i. Monitoring
 - ii. Working with parents/guardians
 - iii. Referral / involvement of other agencies
5. Ongoing support for victims and others

The procedural flowchart (**Appendix F**) and procedural guidelines (**Appendix G**) outline the various actions that may occur and the sequence when managing a case of suspected harm and or maltreatment.

11. Determining measures to ensure confidentiality

In all suspected child protection cases, communication must be treated with confidentiality. Sensitive information is shared only with the group monitoring the case on a 'need to know' basis. It will rarely be appropriate for all staff to be made fully aware of the details of the case.

All records relating to suspected maltreatment and/or harm cases must be kept solely in RecordMy. Through RecordMy, child protection records must be restricted to the CPO and the school principal. In no circumstances are child protection records kept in a child's general file.

12. Responsibilities

The Director of Strategic Performance and Quality Assurance (DSPQA) is the policy owner. The contact officers for this policy are:

- DSPQA
- Safeguarding and Wellbeing Adviser
- ESF CPOs.

SPQA is responsible for leading the development and professional learning of CPOs throughout the Foundation.

Principals are responsible for the implementation of this policy at the school level.

12.1 DSPQA

DSPQA is responsible for communicating this policy and monitoring its implementation. DSPQA is also responsible for providing advice and guidance to principals regarding child protection cases.

12.2 Safeguarding and Wellbeing Adviser

The Safeguarding and Wellbeing Adviser, with support from the ESF CPOs and guidance from DSPQA, is responsible for:

- facilitating a range of continuous professional development throughout the year on aspects related to child protection.
- facilitating regular child protection meetings for CPOs to share updates, draw on the resources within each school and develop a strong network between the schools.
- providing timely support and guidance, in consultation where appropriate, to CPOs on individual cases.

12.3 Principals

Principals are responsible for:

- appointing at least one, preferably two or more, CPOs who have access to appropriate training and support, along with the capacity to fulfil the requirements of this role.
- onboarding new CPOs with the necessary skills and training in preparation for the role.
- providing an alternative route for reporting and acting as a support and sounding board to the appointed CPOs.
- providing support and guidance for all external referrals. CPOs should not make external referrals without discussing and exploring the next steps with the principal, who may provide alternative paths to consider.
- the implementation of this policy and ensuring all procedures and guidelines are adhered to.
- ensuring new staff receive the initial child protection training as developed by the school through induction and staff training.
- ensuring the correct procedures are followed appropriately and fairly in the interests of each child and with due regard to the Hong Kong legal framework and SWD guidelines and procedures (**Appendix B**).

12.4 Child Protection Officers

Child Protection Officers, working with the principal, are responsible for:

- ensuring the rights of the child are central to all child protection discussions and decisions.
- managing any child protection concerns arising in accordance with the procedures and guidelines (**Appendix F & G**).
- accurate record keeping of reported child protection concerns, along with all follow-up actions, conversations and referrals (**Appendix E**).
- liaising with the relevant statutory agencies (**Appendix H**).
- engaging with caregivers, where appropriate, to establish safety and protection for children.
- delivering ongoing child protection and safeguarding training for all staff tailored according to role and

responsibility. Core training involves the introduction of the Child Protection and Safeguarding policy to all staff; further training expands knowledge and understanding of the various aspects of child protection (**Appendix B**).

- ensuring all parent helpers, associates, interns, consultants, guests and visitors who enter the school buildings are made aware of the Child Protection and Safeguarding policy. This can be through a variety of ways, including but not limited to handouts at reception, posters placed in strategic places around the school, and information on the back of lanyards etc.

Refer to **Appendix I** for further information on the role of the CPO.

12.5 Staff members

Staff members at ESF and ESL schools are responsible for:

- knowing their students well, being observant and responsive to any behaviour or indications that harm may be occurring.
- reporting concerns to a CPO using RecordMy.
- partnering with parents and relevant senior colleagues to increase support for the student when necessary.
- maintaining the safety and dignity of all parties concerned.

13. Compliance

ESF staff must follow the procedures outlined in this policy and ensure the child's safety is paramount in all decisions and actions.

A central policy obligation is adherence to SWD guidelines (**Appendix B.4**). Where these guidelines indicate that a case should be referred to the FCPSU, the CPO or principal/ senior manager must do so without delay and not deal with such cases in isolation.

Any matters concerning implementing this policy in a particular school/organisation should be raised with the CPO or principal. Any matters concerning noncompliance should be raised with the DSPQA.

Appendix A: Checklist for identifying possible child maltreatment

The presence of any one or a combination of these indicators is not in itself any proof of child maltreatment. However, these indicators should alert us to the possibility of child maltreatment (**Appendix B.7**).

Signs or symptoms which may possibly indicate neglect

Physical and environmental indicators

- Hunger
- Malnutrition, under-weight or frail
- Tiredness or listlessness
- Child dirty or unkempt
- Consistently poorly or inappropriately dressed for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection demanding or attention seeking behaviour
- Untreated illnesses/injuries
- Severe rash or skin diseases
- Stealing or scavenging compulsively
- Failure to achieve developmental milestones, e.g. growth, weight
- Failure to develop intellectually or socially
- Delayed childhood development (e.g. speech disorder, motor skills, intelligence, etc.)
- Unattended physical problems or unmet medical/ dental needs
- Frequent accidental injuries
- Child with special care/educational needs being deprived of opportunities in receiving appropriate assessment, education or training
- Left in the care of inappropriate carer (e.g. young child)
- Child being exposed to venues with suspected dangerous drugs or drug-taking equipment, carer/other persons suspected to be taking drugs in the presence of the child

Behavioural indicators

- Persistent complaints of hunger or constant rummaging for food, wolfing down meals or begging for/stealing food
- Addiction or delinquency
- Involved in sexual activities because of inadequate supervision

Signs or symptoms which may indicate physical harm

Behavioural indicators

- The explanations of the causes/course of child's injury made by the parent/carer/child are unconvincing/contradictory to or inconsistent with the injuries sustained
- Failure or delay in seeking medical advice
- Excessive amount of clothes worn by the child to cover his/her body

Physical indications

- Patterns of bruising; inconsistent account of how bruising or injuries occurred
- Finger, hand and nail marks, black eyes
- Bite marks
- Round burn marks, burns and scalds
- Lacerations, abrasions, weals
- Fractures
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying

Categories of physical harm

- Bruises and welts:
 - Should be interpreted with reference to various factors, including the number, size and distribution of bruises; bruises that are unlikely to be accidental are suspicious
- Lacerations and abrasions:
 - Laceration to the frenulum (the piece of tissue in the midline that connects the inside of the upper lip to the upper gum) may indicate forced feeding
- Burns and scalds:
 - Inflicted burns may assume the shape or pattern of the burning objects, e.g. a heated plate or cigarette
 - Distribution of scalds on the child's hands/feet or buttocks in glove or stocking shape is indicative of immersion into hot water
- Fractures:
 - Should be interpreted/handled individually based on case circumstances
- Internal injuries:
 - Brain/head injuries - may be caused by a direct impact, shaking or piercing
 - Abdominal injuries - perforation of internal organs may lead to abdominal pain and vomiting
 - Child may have been seriously wounded or even die without any visible signs of injuries
 - Hence, a high degree of suspicion is required to detect abdominal injury
- Others:
 - Fabricated or induced illness, Factitious Disorder Imposed on Another
 - Hair loss by pulling or burning

Signs or symptoms which may indicate psychological (emotional) harm

Physical indicators

- Underweight or frail
- Developmental delay
- Eating disorder (e.g. Anorexia Nervosa)
- Psychosomatic symptoms, which refer to physical discomfort or symptoms resulting from psychological or emotional disturbances, e.g. headache, tummy ache, diarrhoea, vomiting, skin allergy, etc.

Behavioural indicators of the child

- Resisting contact with others and the outside world
- Anxiety symptoms observed, e.g. habitual nail-biting, hair-pulling, thumb-sucking, head-banging and body-rocking, etc.
- Language delay
- Wetting/soiling
- Self-harm or suicidal thoughts/attempts
- Over-reaction to mistakes, continual self-deprecation
- Sudden speech disorders, elective mutism/deafness
- Inappropriate emotional responses, fantasies
- Disruptive behaviour or conduct problems
- Marked deterioration in academic performance
- Rocking, banging head, regression
- Self-mutilation, drug or solvent use
- Fear of parents being contacted
- Running away, compulsive stealing
- Masturbation
- Appetite disorders – anorexia, bulimia
- Soiling, smearing faeces, enuresis

Behavioural indicators of the carer

- Often emotionally unavailable/giving inappropriate emotional response
- Being detached or indifferent towards the child
- Often singling a particular child and treating him/her badly
- Rejection and constant scolding
- Humiliating criticism
- Often requiring the child to bear responsibilities of an adult/that is inappropriate for his/her age
- Encouraging deviant or criminal behavior
- Bizarre punishment
- Repeatedly accusing others of harming/maltreating the child without factual evidence, subjecting the child to repeat unnecessary investigating procedures (this is more common in divorced/separated

families with disputes)

Signs or symptoms which may indicate sexual abuse

Physical indicators

- Torn, stained or bloodstained underclothing
- Complaints of pain during urination
- Complaints of pain, swelling or itching in the genital area
- Pregnancy
- Bowel control or bladder control weakened despite toilet trained
- Repeated urinary tract infection
- Attention seeking behaviour, self-mutilation, substance abuse
- Persistent complaints of stomach disorders or pains
- Eating disorders, e.g. Anorexia Nervosa and bulimia

Behavioural indicators

- Unusually compliant
- Regressive behaviour
- Inability to concentrate, tiredness
- Refusal to communicate, elective mute
- Child showing particular interest in body parts of adults or touching adults' sensitive body parts repeatedly
- Enacting/reproducing scenes of sexual abuse in play or daily behavior
- Child disclosing that his/her parent or other person has played secret games with him/her
- Knowledge about sex or sexual behaviour that is beyond the expectation for the age of the child
- Excessive masturbation
- Hyper-sensitive to being touched
- Highly resistant to stay somewhere or with someone/a specific gender/individual(s) of a certain identity
- Child with adequate self-care abilities disclosing that the carer often takes care of his/her personal hygiene/care matters (e.g. bathing, cleaning after toileting, changing clothes, etc.)
- Child of an older age disclosing that his/her parent of the opposite sex often shares the same bed with him/her
- Having frequent contact with strangers through mobile phone or the internet and having been invited to meet outside

Child maltreatment cases are applicable to children and juveniles under the age of 18.

Appendix B: Further references

1. **Child Abuse...It Matters to You**, August 2008; Social Welfare Department. Available at: <http://www.swd.gov.hk/vs/doc/publicity/Child%20Abuse%20It%20Matters%20You.pdf>
2. **Convention on the rights of the child** (Cartoon version), March 2009. Available at: https://www.cmab.gov.hk/doc/en/documents/policy_responsibilities/CRC_comic.pdf
3. **Hong Kong Family Court Tables - indispensable information written by experts for litigants and legal practitioners in the family courts**, October 2022; by Hong Kong family lawyers. Available at: <https://www.duxburyetc.hk/home>
(Pages 101 - 113 contain websites and contacts to support issues related to children, domestic violence, financial difficulty, legal assistance, adoption, temporary accommodation and hotlines for women and men)
4. **Protecting Children from Maltreatment – Procedural Guide for Multi-disciplinary Co operation**, Revised 2020 (Updated March 2020); Social Welfare Department. Available online at: [https://www.swd.gov.hk/storage/asset/section/1447/en/Procedural_Guide_Core_Procedures_\(Revised_2020\)_Eng_2Nov2021.pdf](https://www.swd.gov.hk/storage/asset/section/1447/en/Procedural_Guide_Core_Procedures_(Revised_2020)_Eng_2Nov2021.pdf)
5. **Relevant Ordinances** related to child protection and child abuse include:
 - [Protection of Children and Juveniles Ordinance, Cap 213](#)
 - [Evidence Ordinance, Cap 8](#)
 - [Domestic and Cohabitation Relationships Violence Ordinance, Cap 189](#)
 - [Criminal Procedure Ordinance, Cap 221](#)
 - [Live Television Link and Video Recorded Evidence, Cap 221](#)
 - [Education Ordinance, Cap 279](#)
 - [Adoption Ordinance, Cap 290](#)
 - [Child Abduction and Custody Ordinance, Cap 512](#)
6. **UN Convention on the rights of the child**, November 1989. Available at: <http://www.ohchr.org/en/professionalinterest/pages/crc.aspx>
7. **Education Bureau Circular No. 1/2020 Handling Suspected Cases of Child Maltreatment and Domestic Violence**, (May 2020), Education Bureau. Available online at: <https://applications.edb.gov.hk/circular/upload/EDBC/EDBC20001E.pdf>

Appendix C: Online safeguarding and child protection guidelines

Strong communication is the most effective way to support the online safeguarding approaches by our staff, students and parents/caregivers. Schools should ensure that all understand the following principles:

Students should	Staff should	Parents should
<ul style="list-style-type: none">● Be able to recognise when they feel safe/comfortable● Know who they can reach out to if they have a concern	<ul style="list-style-type: none">● Know about safe online working practices● Know about their responsibilities in safeguarding students	<ul style="list-style-type: none">● Know their responsibilities in helping to keep their children safe● Understand the schools' commitments and expectations concerning safeguarding

Securing the privacy of students online

Following the ESF Personal Data Handling & Privacy Policy, schools and staff should ensure that any tools or systems used to provide online learning comply with ESF's data protection and privacy measures.

Schools should make parents and caregivers aware that only ESF may approve of the recording of online learning activities. Any resources created during online lessons that involve either the audio or video image of any students require parental consent and are not permitted to be shared with any other parties without the express approval of the teacher, SLT or ESF Centre.

Schools may seek the assistance of the Head of Information Technology at ESFC for support in vetting online tools and systems, as appropriate, for use in relation to online learning and online safeguarding.

One-to-one online sessions

A one-to-one session is any occasion where an adult meets with a student, out of sight or earshot of any other people.

ESF Policy Position	Working Guidance
<p>Permit one-to-one sessions with safeguarding measures. No mandatory recording is required.</p>	<p>Only ESF staff may hold one-to-one engagements with students during the normal school day. Staff will follow best practices to manage the safety and wellbeing of both participants, and schools will communicate these practices to students, parents and caregivers.</p> <p>Safeguarding measures:</p> <ul style="list-style-type: none"> ● Using school-approved platforms and/or video/audio conferencing tools ● Making users aware of their rights, including the ability for either the student or teacher to terminate the session at any time, and to voice concerns with a counsellor, senior leader or the Student Welfare Adviser ● Communicating one-to-one session expectations with parents and caregivers ● Volunteers, such as student teachers, are not permitted to hold one-to-one sessions

Peer-on-peer sessions

A peer-on-peer session is defined as any occasion students are engaged without the direct supervision of a teacher or other ESF staff member. It does not refer to personal communications between students outside of school hours or on platforms not provided for by ESF.

ESF Policy Position	Working Guidance
<p>Permit peer-on-peer activities</p>	<p>ESF schools may make available online spaces that are not always directly supervised by a teacher or other staff member (such as breakout rooms, collaborative online workspaces, student-to-group presentation spaces etc).</p> <p>Students, their parents and caregivers are reminded that these online spaces are to be treated as any other unsupervised physical space at school and that all behavioural expectations still apply. Teachers and school leadership will address any peer-on-peer issues in these online spaces accordingly.</p> <p>Safeguarding measures:</p> <ul style="list-style-type: none"> ● Reviewing school-level behavioural expectations for students in peer-on-peer environments ● Providing clear guidance and support for student leaders and other students hosting peer-on-peer sessions ● Encouraging staff to “drop in” on peer-on-peer sessions where appropriate

Use and distribution of online materials

Online materials are any materials, resources or content created by an ESF staff member or student in the course of their learning, and may be published/shared with different school groups. It includes, but is not limited to:

- Lesson materials
- Photos, videos or audio recordings
- Content published online

ESF Position	Working Guidance
<p>ESF materials, resources and content are not to be shared outside of their intended distribution zone without express permission from an appropriate ESF staff member</p>	<p>ESF schools, teachers and students may, in the course of their online learning, make available online resources or materials, including video or audio recordings, that involve themselves, students and/or others.</p> <p>Staff, students, parents and caregivers are reminded that all online materials are under ESF copyright unless clearly marked as owned by another, and use and distribution of that material are prohibited without ESF's permission.</p> <p>Safeguarding measures:</p> <ul style="list-style-type: none"> ● Guidance/communications for staff, students, parents and caregivers regarding the ESF Academic Integrity Policy ● Permission must be granted by SLT for any requests to share ESF materials outside of school

Unauthorised recording of online learning

Unauthorised recording refers to the recording of any ESF online audio or video conferencing session (including but not limited to lessons, one-to-one, and peer-on-peer sessions) without the express permission of the relevant teacher, SLT or ESF staff member. Students, parents and caregivers may withdraw consent for students to be recorded.

ESF Position	Working Guidance
Online learning may only be recorded by ESF staff. Students, parents and caregivers may withdraw consent to be recorded.	<p>Only ESF staff may record online learning (such as lessons or peer-on-peer sessions). Schools and staff commit to ensuring all recordings, whether they are lessons or products of learning, are made using approved platforms and are stored securely by schools. Students, parents or caregivers may withdraw consent to be recorded.</p> <p>Safeguarding measures:</p> <ul style="list-style-type: none">• The right of students or parents to withdraw recording consent, and communication of those rights as appropriate• Guidance on the ESF Personal Data Handling & Data Privacy Policy• Good recording practices guidance for staff

Presence of parents and caregivers in online learning

Parents and caregivers may be asked to provide support to young students and students with different needs during online lessons. It is important to reiterate that presence during an online lesson is at the request of the school or teacher, to assist with the facilitation of learning.

ESF Position	Working Guidance
<p>Schools are encouraged to seek parental support and involvement in online lessons where appropriate. Parents should have a clear understanding of what constitutes acceptable involvement.</p>	<p>ESF schools expect that students engaging in online lessons will do so with the same level of independence that they would when physically on campus. Schools will assess their year levels/students by need and set clear expectations for parental assistance where additional support is required.</p> <p>Safeguarding measures:</p> <ul style="list-style-type: none"> • Schools to make clear the expectations for parental or caregiver involvement when and where they are required • See: Parent Advice Safeguarding School Checklist for further support

Using volunteers in online learning

A volunteer is any approved non-student, non-ESF employed person who is engaged to assist in the delivery of online learning. A volunteer may include a student teacher or subject matter expert involved in a particular learning topic.

ESF Position	Working Guidance
Continue to permit volunteers and other non-ESF employees where schools see it as appropriate; schools to review their volunteer agreements.	ESF schools may involve volunteers and other non-staff (such as student teachers) in online learning environments. Schools will review their volunteer agreements in light of possible future online involvement. All required child protection and safeguarding declarations must be made by volunteers and schools will follow best practices in order to keep them and the students safe. Safeguarding measures: <ul style="list-style-type: none">• Review of volunteer agreements• Guidance for volunteers around online safeguarding expectations

Online safeguarding for audio and/or video conferencing

Schools and staff are permitted to use online audio and/or video conferencing tools with students for lessons and other school-related activities. Such engagements may be either directly supervised by an ESF staff member or provided to students for peer-on-peer activities without direct supervision.

Schools will ensure all audio and/or video conferencing tools are vetted and approved by their SLT with regard to their ability to support safeguarding approaches. Such safeguarding approaches that may be used by schools include, but are not limited to:

- determining appropriate privacy and sharing settings
- the discretionary recording of online lessons or other online activities by ESF staff only, or by students in the course of their work
- setting behavioural expectations for the proper use of online audio and/or video conferencing, particularly with regards to parental involvement, and one-on-one or peer-on-peer session.
- ensuring appropriate safeguarding declarations exist in agreements for non-staff who may be invited to participate in online school activities

The role of the CPO remains unchanged in online environments. Schools should ensure that staff are aware of the risks involved with providing learning online and how child protection and safeguarding expectations still apply.

Resources for online safeguarding and child protection

- **Safeguarding Network: Online safety and cybercrime**, (2022). Available at: <https://safeguarding.network/content/safeguarding-resources/online-safety/>
- **International Centre for Missing and Exploited Children: Online Safety Education**, (2022). Available at: <https://www.icmec.org/education-portal/online-safety/>
- **Get Safe Online**, (2022). Available at: <https://www.getsafeonline.org/>

Appendix D: Staff guide to dealing with reports of maltreatment

When a child is telling you about a case of maltreatment, it is important to:

- stay calm.
- reassure the child. Tell them they are doing the right thing and that you are pleased they are confiding in an adult. Praise them for having the courage to come forward.
- tell the child that the information they are giving you will be taken seriously and looked into by the school and outside agencies if necessary.
- explain to the child that it is necessary, in order to help them, that you will have to tell certain other parties but assure them that this will not be general knowledge within the school community.
- tell the child whom you will be confiding to next and why. Assure them that (in the case of maltreatment by a parent) their parents will not be informed until there has been further discussion(s).
- validate their feelings.
- tell them that it is not their fault.
- encourage the child to talk. Listen to them rather than ask leading questions.
- check that you have a full understanding of what the child has told you before the end of the discussion.
- be aware that the child may retract all that they have told you either in the initial interview or later. It is important that you still report it.
- find out if the child has told anyone else, either in or outside of school, this information.
- promptly make a detailed report on RecordMy of all the information using the child's language. Include questions asked but do not include your own opinion or comments. This must be recorded in as much detail as possible so that the child does not have to repeat the details of maltreatment unnecessarily.

When a child is telling you about a case of maltreatment, you must refrain from:

- transmitting anger, shock or embarrassment.
- promising confidentiality. Assure the child that you will make every attempt to help them but let them know that you may have to tell other people about the incidents in order to help.
- asking leading questions or pressing for information.
- telling the child that what has happened to them is "dirty, naughty or bad" in any way.
- commenting on the offender and their morality. It may be someone the child loves.
- talking to anyone about what the child has told you, except as necessary, to safeguard the best interests of the child.
- acting without informing the CPO/principal, unless delaying taking any action in order to inform the CPO/principal is not in the best interests of the child.

Appendix E: Record keeping - what to record and how to record

1. What to record

Consideration should be given to any or all of the following:-

1. **Patterns of attendance:** Unexplained absences or those that follow a pattern.
2. **Nature and quantity of contact with parents/domestic helpers/caregivers**
3. **Nature and quantity of contact with school staff:** Nurses, EA, frequently seeking out attention and/or reassurance.
4. **Body language and behaviour:** Changing behaviour associated with a particular time or day; marked changes in behaviour or attitude over time; eating disorders or changes in eating patterns; complaints about feeling unwell, difficulties walking or sitting; sexualised behaviour, symptoms of drug/solvent use. Mood (and changes in this) reactions to adults coming to collect the child.
5. **Language:** Either explicit or ambiguous.
6. **Play:** Acting out maltreatment in play situations or drama; exhibiting extreme aggression or withdrawal; change in play
7. **Drawing and writing (including online):** Pictures or people with detailed genitalia; suspicious incidents in diaries or news; detailed stories of maltreatment in “imaginative” writing.
8. **Medicals and Physical Education:** Reluctance to undress; bruising; torn clothing; bloodstains; smell of semen.
9. **Indications of neglect:** Inappropriate clothing; poor personal hygiene; strong attention or affection seeking; underweight or small for age.
10. **Injuries to the child:** Bruises; lacerations and welts; burns and scalds; injuries or medical problems that do not receive medical attention.
11. **Relationships (including online):** Inappropriate dialogue, conversation or contacts.
12. **Record any individual needs of the child.**

This list is by no means exhaustive, and what is appropriate to record will vary in each case and according to the age and maturity of the child.

2. How to record

All child protection concerns must be recorded on RecordMy using the child protection record form.

- **The record must only contain facts.** These records may be open to disclosure to parents and legal representatives, so they must only contain factual material. It is important not to interpret what is seen or heard but to record observable and factual information. This will also help reduce teachers' concerns

about committing such sensitive matters to paper.

- **Day, date, time and place should be included.** This will make it possible to discern any patterns of behaviour more easily.
- **Background Information** should be included to put the incident in context. The events leading up to and surrounding an incident can be as important as the incident itself. Examples of such relevant information would include details of the setting, triggering factors, and school routine that might have a bearing on the observed behaviour.
- **Any record of the child's words should be verbatim** and not the teacher's interpretation of the child's words. This would include the child's words for the body parts rather than the adult ones used by the teacher. Where a teacher tries to clarify what a child is trying to say, the record should include details of the teacher's questions.
- **Photographic evidence.** Do not take photographic evidence of injuries to the child unless requested by the FCPSU and when the child has provided consent. Photographs must only be taken on a school device by the medical professional or nurse. If a student does not give consent to be photographed do not photograph. Injuries and or evidence of maltreatment involving the intimate areas of a child are not to be photographed. FCPUS and/or police will provide the next steps.

Once the child protection record has been submitted on RecordMy, the school-designated CPOs will receive immediate notification. At this point, the responsibility to manage the suspicion of maltreatment rests with the CPOs with the support of the principal.

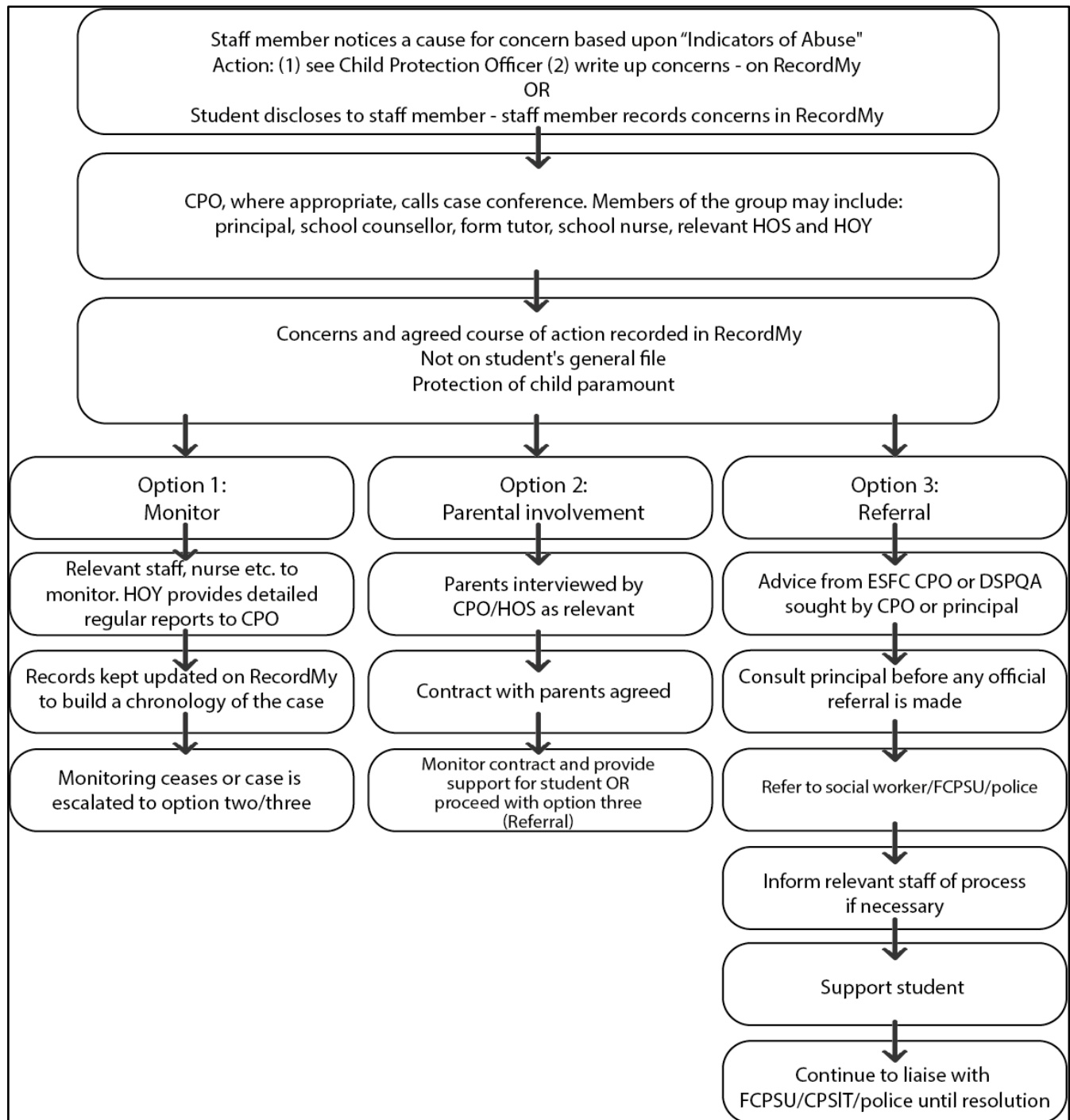
3. Transfer of records

When a child moves from one ESF school to another (including as part of the transition between phases), child protection records within RecordMy should be digitally transferred to the new school/kindergarten from within RecordMy. There should be a meeting between the giving and receiving CPOs when this is a phase transfer. At this meeting:

- the CPO from the current school/ kindergarten should communicate any relevant case information to the CPO in the receiving school.
- complete the transfer between schools using the RecordMy transfer and archive functionality.
- once the new school has received the record, the previous school's records will automatically be archived.

At times requests are made from outside the ESF for information which would potentially involve sharing the contents of a child protection file. In this situation, the CPO should act according to the ESF Personal Data Handling Policy and liaise with the Safeguarding and Wellbeing Adviser and / or the ESF Data Privacy Officer, as needed.

Appendix F: Procedural flowchart



Appendix G: Procedural guidelines

1. Disclosure

Identification of child maltreatment or suspected child maltreatment may occur through observations and/or conversations between a staff member and a student or group of students. Where this happens, the staff member needs to follow the guidelines for conducting a disclosure conversation (**Appendices D and E**).

2. Recording

Details of any indicators of possible child maltreatment observed by a member of staff, whether through observation, disclosure or some other means, must be recorded on RecordMy as soon as possible after an indicator has been observed.

3. Child Protection Officer(s) coordinated response

The CPO, in consultation with the other school designated CPO(s) and/or principal, needs to determine whether there is a basis for a valid suspicion of maltreatment. It is essential to consider the student's current situation, safety and/or likelihood of possible future harm. All notifications of possible child protection cases require prompt follow-up (within ten days from the date of the original report). In cases where significant harm has occurred or there is threat of imminent and serious harm likely to occur immediate action is required (Appendix A - option 3).

3.1 In-school case conference

Upon receiving a child protection notification, the CPO should convene a case conference with relevant colleagues to gather relevant information, seek different perspectives, and help determine the best course of action unless an immediate referral is required.

The conference is led by the CPO and may include:

- Principal
- School counsellor and/or social worker
- Tutor
- School health professional
- Head of section
- Head of year or equivalent

At the case conference, future actions for case management will be identified around a framework of three options:

1. Monitoring concerns;
2. Working with parents/guardians; or
3. Referral/involvement of other agencies.

The outcomes of the conference will be recorded and added to the RecordMy account under the name of the child in question.

After the initial case conference, the CPO will determine whether/when future case conferences will be convened to manage ongoing development of the case. Generally speaking, the CPO should convene further case conferences when:

- a period of monitoring has come to an end, and the monitoring system in use needs to be reviewed;
- significant new information has come to light, or the situation has changed in some way; or
- a further decision on the progress of the case is necessary, e.g. a particular course of action has proved ineffective, and a rethink is needed.

3.2 Monitoring concerns

One possible action to be taken in response to a report of a child protection issue is adopting a monitoring system. The purpose of a formalised framework for monitoring suspected cases of child maltreatment is to:

- clarify the nature and extent of the concerns.
- provide a clear record of the facts which contribute to the development of concerns.
- help to identify patterns of behaviour.
- provide a means of reducing staff concerns.
- enable subsequent referrals to Social Welfare Department to be made clearly and professionally.

3.3 Key components of a monitoring system

The following questions can represent the key components of a monitoring system

1. Who is responsible for monitoring the child?
2. For what specified period are they doing this monitoring?
3. What indicators are they looking out for? (**Appendix D**)
4. What should they do if they witness one or more of these indicators?

Ongoing monitoring enables a detailed understanding to be built up over time of the child's situation. Individual observations may not indicate much by themselves but, when combined with other observations gathered over time, can form a significant 'bigger picture' of the child. All staff involved in a monitoring system should know how it operates and when it will be used.

The school will most often use a monitoring system as a means of information gathering before the involvement of the FCPSU or as a means for the school to manage the case itself. FCPSU/other agencies may ask schools to monitor or to continue monitoring a child to support an ongoing investigation or, following an investigation, to monitor the child's ongoing wellbeing.

4. Working with parents/guardians

Parents and children will feel more confident about the school's ability to deal with the problems if they know that a constructive policy is operating within the school. Good liaison with parents will ensure that they understand the role and duties of school staff in promoting child protection.

5. Referral/involvement of other agencies

The Social Work Officer at the Family and Child Protective Services Unit (FCPSU) of the SWD will provide

advice, including for cases where there are doubts as to whether to make a formal report or not, during office hours. For reports on suspected child maltreatment cases received after office hours, the SWD Outreaching Team (after office hours), through contact by the SWD hotline, will respond to the report.

5.1 Referral to FCPSU

1. In cases of **suspected child sexual abuse or serious physical maltreatment**, the CPO should make a report directly to the FCPSU, which will work with the Child Protection Special Investigation Team (Appendix H).
2. In referring to FCPSU, the CPO may be asked to provide the following information to hand:
 - i. The immediate cause for concern and any immediate danger
 - ii. The child's full name, date of birth, address, I.D. number and special needs of the child
 - iii. The child's whereabouts
 - iv. Name and HKID No. of parents/carers and details of other household members, e.g. siblings.
 - v. Name of the family doctor
 - vi. Name of school
 - vii. Name, position and phone number of contact person
 - viii. Name of other witnesses and other agencies
 - ix. Any additional relevant information you may have
3. It is important to remember that submitted documentation may form part of the evidence should a case develop into court proceedings.
4. It may be helpful to explain to the duty officer what expectations there are of the CPIST, e.g. that they will ring back within a certain time, keep you informed, etc.
5. A copy of the referral information should also be sent to the DSPQA.

Do not contact the parents at this stage. Agree with the FCPSU on how this will be handled and by whom.

Confidentiality in these matters must be considered at all times. It may be important to avoid the risk of an abuser being alerted prematurely before the child is adequately protected or when police evidence could be destroyed.

6. Ongoing support for victims and others

ESF schools are committed to supporting any student who has had traumatic experiences. There can be high anxiety levels for those involved with supporting known victims of maltreatment. Staff often underestimate their abilities in this field and negate their skills and experience because of the emotional impact of child maltreatment.

6.1 Care for students

Children and young people who experience maltreatment may have a change in behaviour, which can be difficult to manage. Being caring, consistent and attentive will be a support. Staff must continue to work as part of a team to provide consistent and appropriate care. Staff should monitor behaviour change for signs of post-traumatic stress and make decisions about whether the student needs access to further support, such as counselling.

Clear communication between staff, family, and other agencies will help understand the child's situation and develop strategies to support the child and promote positive behaviour.

7. Care for staff

Consideration needs to be given to the impact on those involved with a child protection case. Schools should ensure a system of support is available for all staff members. ESF commits to supporting staff and providing a support network for CPOs. If necessary, staff can be supported in this area through the ESF Employee Assistance programme.

Appendix H: Community contacts

1. **Against Child Abuse**, (2022). Available at: <https://aca.org.hk/tc/>
2. **Contact Information for Social Welfare Department Family and Child Protective Services Units**, (2022). Available at: [https://www.swd.gov.hk/storage/asset/section/224/en/Updated_contact_information_\(English_version\).pdf](https://www.swd.gov.hk/storage/asset/section/224/en/Updated_contact_information_(English_version).pdf)
3. **End Child Abuse Sexual Abuse Foundation**, (2022). Available at: <https://www.ecsaf.org.hk/en-hk/>
4. **Family and Child Protective Services Units of the Social Welfare Department contact numbers:**

Region	Service Boundary	Office Tel No.
Hong Kong Island	Central, Western, Southern and Islands	2835 2733
	Eastern and Wanchai,	2231 5859
Kowloon East	Wong Tai Sin and Sai Kung	3188 3563
	Kwun Tong	3586 3741
Kowloon West	Kowloon City and Yau Tsim Mong	3583 3254
	Sham Shui Po	2247 5373
New Territories (North)	Tai Po and North	3183 9323
	Tuen Mun	2618 5710
	Yuen Long	2445 4224
New Territories (South)	Shatin	2158 6680
	Tsuen Wan and Kwai Tsing	2940 7350

5. **Hotlines:**

Social Welfare Department	2343 2255
Family Crisis Support Centre	18288
CEASE Crisis Centre 24-Hour Hotline	18281

Against Child Abuse	2755 1122
End Child Sexual Abuse Foundation	2889 9933
Equal Opportunities Commission (DDO)	2511 8211

Appendix I: Role of the Child Protection Officer

Child protection is a complex issue with five key areas to be considered:

1. Monitoring concerns/suspicion
2. Dealing with clear indications of possible maltreatment
3. Coping with known victims
4. Dealing with parents and community
5. Curriculum development*

**particularly in student agency/ autonomy, and Relationships and Sexuality Education Policy.*

The CPO must:

- familiarise themselves with the ESF Procedures.
- keep up to date with relevant information, legislation and developments regarding child protection.
- be a point of contact and support for staff in cases of suspicion or disclosure.
- refer cases to the SWD's Family and Child Protective Services Unit (FCPSU), where appropriate, after consultation with the principal and the person who raised the concern.
- coordinate information and develop communication between the school and other agencies.
- ensure there is support within the school for children who have been maltreated and/or neglected.
- ensure child protection and safeguarding are given due emphasis.
- coordinate aspects of personal safety curriculum development.
- contact the Safeguarding and Wellbeing Adviser if in doubt about the procedure.

CPOs should be the focal point in the school for all staff. However, this should not mean that they carry the total responsibility, and recognition should be given of their possible need for practical and emotional support.

Appendix J: Childhood timeline: Rights and responsibilities

Hong Kong Family Court Tables - Indispensable information written by experts for litigants and legal practitioners in the family courts (pages 102 - 104), October 2022; by Hong Kong family lawyers. Available at: <https://www.duxburyetc.hk/home>

Age	Rights and responsibilities	Source
"Sufficient age and understanding"	Guardian or parent must take into account the views of the minor when appointing new guardian	s 6(5) of Cap 13
	Consent to medical operations	Gillick v West Norfolk and Wisbech Health Authority [1986] AC 112 (HL)
	Consent to adoption	Re S (Parent As Child Adoption Consent) [2018] 2 FLR 111
6	Attend primary school	ss 3(1) and 74(1) of Cap 279
10	Age of criminal responsibility	s 3 of Cap 226
11	Use or hire a bicycle unaccompanied by an adult	s 54 of Cap 374
12	Attend secondary school	ss 3(1) and 74(1) of Cap 279
14	Give sworn evidence in court	s 4 of Cap 8
15	Age of criminal responsibility for possession of an imitation firearm	s 20 of Cap 238
	Work on licensed premises (liquor) with permission of the Liquor Licensing Board	reg 29 of Cap 109B
16	Engage in heterosexual intercourse	s 124 of Cap 200; So Wai Lun v HKSAR (2006) 9 HKCFAR 530
	Engage in homosexual buggery	s 118C of Cap 200
	Marry with parental consent	s 13 of Cap 181
	Become a voting member of a registered trade union	s 17 of Cap 332
	Voluntarily admission or discharge from a mental hospital	s 30 of Cap 136
17	Pilot a private aeroplane or helicopter	art 20 of Cap 448C
	Gain admission to a post secondary college	reg 6 of Cap 320A
18 (or majority)	Enter into contracts as an adult (save for necessities)	s 4 of Cap 26; Nash v Inman [1908] 2 KB 1; Roberts v Gray [1913] 1 KB 520
	Donate an organ	s 5D of Cap 465
	Required to join an employee MPF scheme	s 2(1) of Cap 485
	Drink liquor on a licensed premises	reg 28 of Cap 109B
	Work on licensed premises (liquor)	reg 29 of Cap 109B
	Purchase liquor	reg 37 of Cap 109B
	Obtain a hawkers licence	reg 6 of Cap 132A
	Obtain a library card without a guarantor	s 10 of Cap 132AL

	Pilot a commercial aeroplane or helicopter	art 20 of Cap 448C
	Vote as an elector for the Legislative Council	s 29 of Cap 542
	Work on a construction site	reg 4A of Cap 59I
	Make a valid will	s 4 of Cap 30
	Obtain a standard driving licence	reg 7(1) of Cap 374B
	Get tattooed	s 3 of Cap 323
	Become a member of the executive of a registered trade union	s 17 of Cap 332
	Buy tobacco products	s 15A(1) of Cap 371
21	Become an air traffic controller	s 65 of Cap 448C
	Serve as a juror	s 4 of Cap 3
	Serve as a sole executor of a will	s 39 of Cap 10
	Stand for election to the Legislative Council or District Councils	s 37 of Cap 542; s 20 of Cap 547
	Marry without parental consent	s 14 of Cap 181
	Adopt a relative	s 5(1) of Cap 290
	Register as a nurse or midwife	s 8 of Cap 164; s 7 of Cap 162
	Obtain a non-standard driving licence	reg 7(1) of Cap 374B
	Engage in heterosexual buggery	s 118D of Cap 200
25	Adopt a non-relative	s 5(1) of Cap 290