

**Anfield School
Anfield International Kindergarten
Anfield St. Bosco Koon Ying School
Anfield International Kindergarten and Nursery**



Mandatory Reporting Policy

Anfield is a group of four educational institutions: Anfield School, Anfield St. Bosco Koon Ying School, Anfield International Kindergarten, and Anfield International Kindergarten & Nursery. They share a unified commitment to safeguarding and child protection. All four schools operate under the same policies and practices, ensuring a consistent and robust approach to student welfare across each campus. In this policy, "Anfield" means all four schools.

Anfield is committed to safeguarding and promoting the welfare of every child in its care. This Mandatory Reporting Policy establishes Anfield as an institution dedicated to creating and maintaining a safe, nurturing, and supportive environment that is free from any form of child abuse, neglect, or exploitation, both online and offline. It aims to embed a positive, child-safe culture across all its operations, aligning with international best practices like Australia's National Principles for Child Safe Organisations and the UK's Keeping Children Safe in Education (KCSIE) guidance.

This policy outlines the school's comprehensive procedures for recognising, responding to, and reporting any concerns, disclosures, or suspicions of child abuse and maltreatment, including online harms, child-on-child abuse/peer abuse, and allegations against staff or volunteers. It is designed to ensure that all individuals associated with Anfield understand their roles and responsibilities in protecting children and contributing to their well-being within all school environments and activities, whether on campus or off-site.

This policy applies to all staff members of Anfield School, Anfield St. Bosco Koon Ying School, Anfield International Kindergarten, and Anfield International Kindergarten & Nursery, including those employed by external contractors.

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A. POLICY PRINCIPLES AND COMMITMENTS

Anfield's Mandatory Reporting Policy is underpinned by a set of fundamental principles that guide all actions concerning child safety and welfare. These principles establish a proactive, child-safe culture across all school operations, aligning with international best practices and legal frameworks.

1. **The Welfare of the Child is Paramount and Child-Centered:** In all actions concerning children, their best interests shall be the primary consideration. This commitment includes ensuring that children, defined as persons under the age of 18 years, feel secure, are encouraged to talk, and that their wishes and feelings are actively considered when determining actions and services, alongside their immediate safety. Our approach focuses on the child's needs, helping them connect to professional services for safety and recovery from trauma. This also means ensuring all children receive necessary protection and care.
2. **Zero Tolerance for Abuse:** Anfield maintains a culture that does not tolerate child abuse, neglect, or exploitation in any form. This includes, but is not limited to, physical abuse, sexual abuse, emotional abuse, neglect, and exposure to domestic violence. This policy specifically addresses sexual violence, sexual harassment, and child-on-child abuse (also referred to as peer abuse), emphasising that such behaviors are never acceptable and will not be tolerated. Victims will be taken seriously, supported, and kept safe, and will never be made to feel that reporting is creating a problem. Our policies and curriculum reinforce that sexual harassment and sexual violence are always unacceptable.
3. **Shared Responsibility for Safeguarding:** Safeguarding and promoting the welfare of children is everyone's responsibility within our school community. This policy applies to all members of staff, pupils, external contractors, volunteers, and visitors of the school, who must remain vigilant and proactive. All staff, regardless of their direct contact with children, play a vital role in identifying concerns early, providing help, promoting welfare, and preventing issues from escalating, recognising this as an inescapable personal and professional duty.
4. **Equal Protection and Non-Discrimination:** This policy applies equally to all children without discrimination, ensuring equal protection from harm and abuse regardless of their age, disability, gender, racial heritage, religious belief, sexual orientation, or identity (protected characteristics). We recognise and respect the fundamental rights of children, including freedom of thought, conscience, religion, and association, as outlined in international instruments like the UN Convention on the Rights of the Child (UNCRC).

5. **Balanced Confidentiality and Information Sharing:** All concerns and reports will be handled with the utmost privacy and dignity. While maintaining privacy is crucial, staff should never promise absolute confidentiality if keeping a secret would compromise a child's safety or well-being. Information will be shared only on a 'need-to-know' basis to facilitate necessary support and intervention, in compliance with relevant data protection legislation. Protecting the child's welfare is paramount and overrides data privacy if and insofar as necessary.
6. **Compliance with Legal and Regulatory Frameworks & Accountability:** This policy is developed in accordance with the Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650). This Ordinance mandates reporting of "serious harm" as defined in Schedule 2 (e.g., harm endangering a child's life or physical health requiring urgent medical treatment; harm endangering psychological health or development; harm caused by coercing a child into sexual acts; or harm caused by neglect endangering life or health). While the Ordinance is expected to come into effect in January 2026, Anfield adopts its standards immediately to prepare staff and prioritise student safety. The policy also draws upon best practices from international guidelines such as the UK's Keeping Children Safe in Education (KCSIE) guidance and Australia's National Principles for Child Safe Organisations. Anfield recognises its obligations under international instruments like the UNCRC, particularly Article 19, which calls for legislative, administrative, social, and educational measures to protect children from all forms of violence, injury, abuse, neglect, maltreatment, and exploitation.

Adherence to all relevant laws, legislation, and this policy is mandatory for all individuals working for or on behalf of the school. Failure to comply with mandatory reporting obligations is a criminal offence under Cap. 650, punishable by a fine of up to HK\$50,000 and/or imprisonment for up to 3 months. Staff are empowered and expected to act immediately and without delay on any welfare concerns. In situations of immediate danger or significant harm, staff are explicitly authorized to contact Hong Kong's Social Welfare Department (SWD) Family & Child Protective Services or the Hong Kong Police directly, without waiting for internal processes to conclude. The school's Whistleblowing Policy further reinforces this commitment, ensuring individuals feel safe and confident to report concerns, including those about colleagues or senior leadership.

B. DEFINITIONS OF KEYS TERMS

To ensure a common and comprehensive understanding among all individuals associated with Anfield, this policy defines key terms as follows:

- **Child (or Children):** A person (or persons) under the age of 18
- **Safeguarding:** This term encompasses actions taken to promote the welfare of children and protect them from harm, including all forms of exploitation, abuse, harassment, or bullying. It involves preventing harm from occurring, protecting individuals (especially vulnerable adults and children) from harm, and responding appropriately when harm does occur. Safeguarding goes beyond child protection to include broader issues such as child health and safety, anti-bullying, digital safety, and medical provision. In the context of schools, it means protecting children from maltreatment, preventing impairment of their mental and physical health or development, ensuring they grow up in circumstances consistent with safe and effective care, and taking action to enable all children to have the best outcomes.
- **Abuse (Child Abuse or Maltreatment):** Child abuse or maltreatment refers to any behaviour or treatment by parents, caregivers, other adults or older adolescents that results in the likelihood of and/or actual physical or emotional harm to a child or young person. It is rarely an isolated event and may involve multiple types of maltreatment. Abuse can be perpetrated by adults or other children (child-on-child abuse) and can occur wholly online, or technology may be used to facilitate offline abuse.
 - **Physical Abuse:** The use of physical force against a child that results in harm for the child's health, survival, development or dignity. This can involve hitting, beating, kicking, shaking, biting, strangling, scalding, burning, poisoning, suffocating. It may also include instances where a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

For mandatory reporting purposes, this specifically includes harm that endangers a child's life or physical health and requires urgent medical treatment, such as loss of any limb or its function, loss of sight or hearing, injury to any internal organ, fracture of any bone, burns on body surface, wounds causing nerve, muscle or tendon damage or severe haemorrhage, or loss of consciousness or impaired consciousness, as outlined in Schedule 2 of the Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650).

- **Sexual Abuse:** Involves forcing or enticing a child or young person to take part in sexual activities. These activities do not necessarily involve violence and may or may not include physical contact. Examples include assault by penetration, non-penetrative acts, involving children in looking at or producing sexual images, watching sexual activities, encouraging inappropriate sexual behaviors, or grooming a child in preparation for abuse. Sexual abuse can occur online, and technology can facilitate offline abuse. It is not solely perpetrated by adult males; women and other children can also be abusers.

For mandatory reporting purposes, "serious harm" in this context specifically refers to coercing or enticing a child to take part in rape, incest, buggery, sexual intercourse, or any act of gross indecency, as specified in Schedule 2 of the Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650).

- **Emotional Abuse:** The persistent emotional maltreatment of a child that causes severe and adverse effects on their emotional development. This may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It can also include not giving a child opportunities to express their views, deliberately silencing them, or 'making fun' of what they say or how they communicate. While it can occur alone, some level of emotional abuse is involved in all types of child maltreatment.

For mandatory reporting purposes, this constitutes "serious harm" when it endangers a child's psychological health or development, specifically including mental derangement or prolonged psychological trauma. It explicitly excludes any emotional reaction (such as distress, grief, fear and anger) that is a response to the ordinary vicissitudes of life, as defined in Schedule 2 of the Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650).

- **Neglect:** The persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in the serious impairment of the child's health or development. This may include a parent or carer failing to provide adequate food, clothing, and shelter (including abandonment), protection from harm, adequate supervision, or access to appropriate medical care. It can also involve unresponsiveness to a child's basic emotional needs.

For mandatory reporting purposes, "serious harm" caused by neglect refers to the failure of a responsible person of a child to provide necessities for maintaining the child's life or health, or by exposing the child to a situation or environment that endangers the child's life or health (e.g., allowing the child to access or take any dangerous drug or substance), as specified in Schedule 2 of the Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650).

- **Serious Harm:** This term is specifically defined in Schedule 2 of the Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650). It includes:
 - Any harm that endangers a child's life, or harm that endangers a child's physical health and requires urgent medical treatment. This includes loss of limbs or function, loss of sight or hearing, injury to internal organs, bone fractures, body surface burns, wounds causing nerve/muscle/tendon damage or severe hemorrhage, and loss or impairment of consciousness.
 - Any harm that endangers a child's psychological health or development, including mental derangement and prolonged psychological trauma, but excluding normal emotional reactions to life's vicissitudes.
 - Any harm caused by coercing or enticing a child to take part in rape, incest, buggery, sexual intercourse, or any act of gross indecency.
 - Any harm caused by the neglect of a responsible person of a child that endangers the child's life or health, such as failing to provide necessities or exposing the child to dangerous situations or environments.

For the purposes of this policy, "Serious Harm" encompasses both actual harm a child is suffering and a real risk of a child suffering serious harm. "Real risk" in this context excludes mere theoretical or fanciful risks and requires a case-specific assessment considering various factors such as the child's situation, the suspected abuser, family dynamics, and environmental factors.

- **Mandatory Reporting:** The legislative requirement for specified individuals to report suspected child abuse and neglect to government authorities. In Hong Kong, the Mandatory Reporting of Child Abuse Ordinance (Cap. 650) mandates certain professionals to report suspected serious child abuse cases. Failure to comply can lead to legal consequences, including fines and imprisonment.
- **Designated Safeguarding Lead (DSL):** A senior member of staff, from the school leadership team, appointed to take lead responsibility for safeguarding and child protection. The DSL provides support to staff, manages referrals to local authority children's social care or police, liaises with external agencies, maintains confidential child protection records, and leads safeguarding training and awareness within the school. Anfield will also have Deputy Designated Safeguarding Leads (DDSLs) who are trained to the same standard and can deputise in the DSL's absence, though the ultimate lead responsibility remains with the DSL.
- **Mandated Reporter (or Specified Professional):** An individual, typically a professional, who is legally obligated to report suspected child abuse to relevant authorities. Under the Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650), registered teachers (working in a specified school), registered nurses, social workers, and other specified professionals are considered "specified professionals" and are legally required to report suspected serious child abuse cases. *(Note 1)*

- **Responsible Person (in relation to a child):** A person who has attained the age of 18 years and has the custody, charge, or care of the child. This definition is from the Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650).
- **Child-on-Child Abuse (or Peer Abuse):** Abuse that occurs between children, encompassing a wide range of harmful behaviors perpetrated by a child or young person against another. This can be as serious as adult-perpetrated abuse and takes place both online and offline. It includes, but is not limited to:
 - Bullying, including cyberbullying, prejudice-based, and discriminatory bullying
 - Abuse in intimate personal relationships between children (sometimes called “teenage relationship abuse”)
 - Physical abuse, such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - Sexual violence, including rape, assault by penetration, and sexual assault
 - Sexual harassment, which is unwanted conduct of a sexual nature, including sexual comments, jokes, physical behavior like touching, and online sexual harassment
 - Causing someone to engage in sexual activity without consent
 - Consensual and non-consensual sharing of nude or semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)
 - Upskirting
 - Initiation/hazing-type violence and rituals

Anfield School maintains a zero-tolerance approach to child-on-child abuse.

- **Online Harms (or Online Safety):** A significant component of many safeguarding and wellbeing issues where children are at risk of abuse and other harms both online and face-to-face, often concurrently. It involves various risks children face when using technology and can also facilitate offline abuse. These risks are broadly categorised into four areas:
 - **Content:** Exposure to illegal, inappropriate, or harmful material, such as pornography, fake news, racism, self-harm, radicalisation, and extremism
 - **Contact:** Harmful online interaction with other users, including peer-to-peer pressure, commercial advertising, and adults attempting to groom or exploit children for sexual, criminal, financial, or other purposes
 - **Conduct:** Online behaviour that increases the likelihood of, or causes, harm, such as making, sending, or receiving explicit images (consensual and non-consensual sharing of nudes/semi-nudes) and online bullying
 - **Commerce:** Risks like online gambling, inappropriate advertising, phishing, and financial scams

Schools are required to have appropriate filtering and monitoring systems on their IT networks and to educate children on online safety.

- **Low-Level Concerns:** Any concern, no matter how small, or a "nagging doubt," that an adult working for or on behalf of the school (including supply staff, volunteers, and contractors) may have acted in a way that is inconsistent with the staff code of conduct but does not meet the 'harm threshold' for statutory intervention. These concerns, while not immediately meeting the threshold for referral to statutory authorities, are crucial to address as they could indicate behavior that might escalate to cause harm in the future. Examples include:

- Being overly friendly with children
- Having "favourites" among students
- Taking photographs of children on a mobile phone contrary to school policy.
- Engaging with a child one-on-one in a secluded area or behind a closed door
- Humiliating children

All low-level concerns must be shared responsibly, recorded in writing, and dealt with appropriately to identify potential patterns of inappropriate behavior and prevent escalation

NOTE:

1. **Mandated Reporter (or Specified Professional):** *An individual, typically a professional, who is legally obligated to report suspected child abuse to relevant authorities. Under the Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650), the 25 categories of specified professionals as set out in Schedule 1 to the Ordinance are considered "specified professionals" and are legally required to report suspected serious child abuse cases. These include, but are not limited to: registered teachers (working in a specified school), registered nurses or enrolled nurses, registered social workers, school heads (if holding a specified professional qualification as listed in Schedule 1 of the Ordinance, such as a registered teacher), administrators (if holding a specified professional qualification as listed in Schedule 1 of the Ordinance), Counsellors (if holding a specified professional qualification as listed in Schedule 1 of the Ordinance, such as a registered social worker, clinical psychologist, or educational psychologist), registered doctors, dentists, pharmacists, midwives, medical laboratory technologists, Chinese medicine practitioners, and educational/speech therapists, and other professionals designated by regulation.*

C. SCOPE OF THE POLICY

This policy establishes Anfield's comprehensive framework for safeguarding children and applies broadly to all individuals and activities connected with the school, ensuring a safe, nurturing, and protective environment that is free from any form of child abuse, neglect, or exploitation, both online and offline.

This Mandatory Reporting & Safeguarding Policy is an integral part of Anfield's comprehensive child safety framework. It should be read and implemented in conjunction with other key school policies, including, but not limited to, the Staff Code of Conduct, Online Safety Policy, Behaviour Policy, Recruitment and Selection Policy, and Whistleblowing Policy. Together, these policies ensure a holistic approach to safeguarding and promoting the welfare of all children within our community.

Specifically, this policy applies to:

- All persons undertaking work for, or engaging with, Anfield, reflecting the fundamental principle of shared responsibility for safeguarding. This includes, but is not limited to:
 - All members of the School Board or Governors
 - The Executive Head, Head of School and all teaching and non-teaching staff, encompassing permanent, temporary, and supply personnel
 - External contractors, volunteers, and visitors of the school
 - This comprehensive scope ensures that anyone acting on behalf of Anfield, in any capacity, whether paid or unpaid, is covered by these safeguarding provisions
- For the purposes of this policy, a child is explicitly defined as any person under the age of 18 years. This definition is consistent with the Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650) and aligns with international best practices from frameworks such as the UK's Keeping Children Safe in Education (KCSIE) guidance and the UN Convention on the Rights of the Child (UNCRC), which calls for protection of children from all forms of violence and exploitation.
- This policy covers all concerns, allegations, or disclosures of child abuse and maltreatment, recognizing that such issues are rarely standalone events and can involve multiple overlapping issues. This includes:
 - Traditional forms of abuse: physical abuse, sexual abuse, emotional abuse, and neglect
 - Online harms and misuse of technology, acknowledging that abuse can take place wholly online, or technology may be used to facilitate offline abuse. This encompasses risks such as the non-consensual sharing of indecent images, abusive or harassing messages, and exposure to harmful content or exploitation.
 - Child-on-child abuse (also referred to as peer abuse), which includes bullying (including cyberbullying, prejudice-based, and discriminatory bullying), sexual violence, and sexual harassment between children

- Allegations made against staff members, volunteers, or other adults connected with the school. This also extends to managing "low-level concerns" about staff (e.g., inappropriate comments or minor misconduct that do not meet the harm threshold but could escalate if unaddressed).
 - Other significant safeguarding issues such as child exploitation (including criminal exploitation and child sexual exploitation, and county lines), children missing from education, domestic abuse, so-called 'honour'-based abuse (including Female Genital Mutilation and forced marriage), radicalisation, and mental health problems that may indicate abuse, neglect, or exploitation
- The policy applies to situations arising within the school environment (across all Primary and Kindergarten campuses), during school-related activities (whether on-site or off-site), and importantly, it also addresses concerns arising outside of school that impact a child's safety and well-being. This includes recognising potential risks stemming from a child's experiences in their home, community, or online, and how these may affect them in the school setting.

D. ROLES AND RESPONSIBILITIES

Every adult in the Anfield community shares the responsibility to keep children safe. All staff, volunteers, and leaders must be clear about their safeguarding duties and act immediately on concerns.

i. School Board / Governors

The School Board holds strategic leadership responsibility for child protection. Their duties include:

- Reviewing and approving this policy annually, ensuring compliance with Cap. 650 (HK) and international standards (e.g. KCSIE 2024).
- Ensuring that appropriate online filtering and monitoring systems are in place and regularly reviewed.
- Appointing the School Supervisor and the Executive Head for Safeguarding to lead oversight and scrutiny.
- Requiring regular safeguarding training for all Board members, enabling effective challenge and accountability.

ii. Executive Head, Head of School and Senior Management Team (SMT)

The Executive Head, Head of School and SLT are responsible for embedding safeguarding throughout the school. Key duties include:

- Implementing this policy consistently across all campuses
- Meeting regularly to monitor and respond to safeguarding risks
- Ensuring all staff and volunteers understand and follow child protection procedures.
- Allocating time, funding, and training for all staff
- Acting as the final decision-maker for low-level concerns and managing allegations against staff
- Liaising with statutory agencies (e.g. Social Welfare Department, Police) as needed
- Ensuring that parents are engaged and informed, where appropriate
- Maintaining a safe physical and online school environment

iii. Designated Safeguarding Leads (DSLs) and Deputy DSLs (DDSLs)

Anfield appoints trained DSLs and DDSLs across all campuses. A DSL or DDSL must always be available during school hours.

a. Designated DSLs and DDSLs:

- **Angela Lee** – School Supervisor (DSL and Safeguarding Governor)
- **Elise Rees** – Executive Head (DSL)
- **Monica Dolan** – Head of School, Anfield School (DSL)
- **Rebecca Vicars** – Deputy Headteacher, Anfield School (DDSL)
- **Lee Chetwyn-Horan** – Head of School, St. Bosco Koon Ying School (DSL)
- **Vicki Huckstep** – Class Teacher, St. Bosco Koon Ying School (DDSL)
- **Sally Newman** – Head of School, Anfield International Kindergarten, KT Campus (DSL)
- **Vickie Russell** – Head of School, Anfield International Kindergarten & Nursery, LV Campus (DSL)
- **Brogan Fraser-Standaloft** – Deputy Headteacher, Anfield International Kindergarten (DDSL)
- **Naomi Wicki** – Inclusion Coordinator, Kowloon Tong & Whampoa Campus)

b. Core responsibilities include:

- Being the main point of contact for child protection concerns
- Receiving and acting on disclosures, including coordinating and supporting staff in fulfilling their personal legal obligation to make mandatory reports to authorities under Cap. 650. It is crucial that all mandated reporters understand that their duty to report remains with the individual who forms the reasonable grounds, as this duty does not rest with the team or the DSL.
- Liaising with external agencies, including the Social Welfare Department, Police, and medical or psychological services
- Keeping secure and confidential records using MyConcern system
- Ensuring that all records are transferred safely when a child joins or leaves the school
- Leading and overseeing training for all staff, including refresher training (annually for staff, biannually for SMT)
- Promoting a school culture where children feel safe, are heard, and can disclose without fear
- Representing the school in Child Protection Conferences or ensuring written reports are submitted

c. All Staff and Volunteers

All adults working or volunteering at Anfield are required to:

- Understand and follow this policy and the Staff Code of Conduct
- Be vigilant and proactive, adopting a mindset of “it could happen here”
- Immediately report any concern, suspicion, or disclosure, verbally and in writing, to the Head of School
- Recognise their legal duty under Cap. 650:

Specified professionals (e.g., registered teachers) must report any suspected serious harm or real risk of it to the Director of Social Welfare or Police as soon as practicable. Failure to report is an offence.

- Follow safe disclosure procedures:
 - Stay calm, listen, and reassure the child
 - Do not promise confidentiality - explain the need to act for their safety
 - Do not investigate or confront anyone involved.
- Participate in induction and annual safeguarding training, including online safety
- Prioritise the child’s welfare above all else, including reputation or loyalty concerns

d. Support Staff

Pastoral and support staff have direct roles in student well-being and safeguarding. Their duties include:

- Offering early support and intervention to students experiencing distress or trauma
- Working in close coordination with the Head of School and external services to ensure timely referrals
- Monitoring for behavioural or emotional indicators of abuse, especially in children with SEND
- Respecting confidentiality while knowing when to share concerns promptly with the Head of School
- Maintaining a supportive, calm, and safe space for children to speak openly

e. Parents and the Wider Community

Safeguarding begins at home. Parents and guardians are expected to:

- Accept their primary role in their child's safety and development
- Stay alert to signs of abuse, online risks, or sudden changes in behaviour
- Report concerns to the Head of School or directly to authorities in emergencies
- Support the school in implementing safeguarding measures, plans, and referrals
- Understand that while parental consent is preferred, it may be bypassed if it puts a child at risk
- Engage with the school's safeguarding policies, online safety tools, and family support resources

NOTE:

2. *The Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650) clearly states that mandated reporters are personally liable to make a report. This duty "does not rest with the team they work for". While the DSL plays a crucial role in receiving concerns, assessing them, and coordinating the reporting process, their involvement does not transfer the legal duty from the individual who has reasonable grounds to suspect serious harm. Clarifying this ensures that all mandated reporters understand their inescapable personal and professional duty under Cap. 650.*

E. GUIDELINES FOR RESPONDING TO DISCLOSURE

1. Fundamental Approach (The "How-To"):

- **Prioritise the Child's Welfare:** The paramount principle is the child's best interests and safety
- **Be a Supportive Listener, Not an Investigator:** Staff should listen calmly and with full attention, allowing the child to speak freely without interruption. It is crucial not to interrogate, ask leading questions, or probe for excessive details. The role is to receive the disclosure, not to conduct an investigation, as this could compromise future professional inquiries by child protection services or police.
- **Reassure and Validate:** Immediately reassure the child that they did the right thing by telling. Emphasize that it is not their fault and that they will be helped and kept safe. Acknowledge their bravery.
- **Manage Confidentiality Carefully:** Staff should never promise absolute confidentiality. Explain clearly that information must be shared with those who need to know (e.g., Head of School, authorities) to ensure their safety and well-being. The child's welfare is paramount and overrides data privacy when necessary. Information will be shared only on a 'need-to-know' basis.
- **Do Not Confront Alleged Perpetrators:** Staff must not confront the person causing harm. This task is exclusively for trained professionals like child protection workers or police. Confronting an alleged perpetrator could create a risk to the child's safety.
- **Do Not Contact Parents Prematurely:** Staff should not contact parents/carers themselves unless specifically directed by the Head of School. In some cases, informing parents prematurely may place the child at greater risk.

2. Immediate Reporting and Documentation:

- **Act Immediately:** Upon identifying a concern or receiving a disclosure, staff must act immediately and without delay. It is always better to report early than to risk leaving a child in danger.
- **Inform the Head of School:** The primary step is to report to the Head of School (DSL) (or Deputy Head if the Head of School is unavailable)
- **Record Details Accurately:** Document what was seen, heard, or disclosed (using the child's exact words if possible), including the date, time, and location. These notes should be factual, signed, and dated. Detailed, accurate, and secure written records are crucial for all concerns, discussions, and decisions.
- **Support for Staff:** Acknowledge that responding to disclosures can be distressing for staff and emphasise the availability of support.

F. REPORTING PROCEDURES AND PROTOCOLS

Anfield is committed to safeguarding and promoting the welfare of every child, ensuring a safe, nurturing, and supportive environment free from abuse, neglect, or exploitation. This section outlines the comprehensive procedures for recognising, responding to, and reporting any concerns, disclosures, or suspicions of child abuse and maltreatment, including online harms and child-on-child abuse. Our approach is child-centered, with the child's best interests being the primary consideration in all actions. **The Executive Head and School Supervisor MUST be informed of any concern immediately and without delay.**

i. General Guidelines for Responding to Concerns and Disclosures

When a child discloses abuse, or when abuse is suspected, the initial response is crucial for their well-being and for any subsequent professional investigation. Staff should prioritize providing immediate support and comfort, while recognizing their role as supportive listeners, not investigators.

- **Listen calmly and with full attention:** Give the child your full attention, allowing them to take their time and use his/her own words. Maintain a calm appearance, being mindful of facial expressions, body language, and tone of voice. If you are distressed, reassure the child that they are not the cause.
- **Reassure and Validate:** Reassure the child that they did the right thing by telling, that it is not their fault, and that you believe them. Acknowledge his/her bravery.
- **Do not investigate or question further:** It is not your role to counsel or investigate the child's claims. Avoid asking leading or probing questions, as this could compromise a future investigation by child protection professionals or the police.
- **Do not promise absolute confidentiality:** Explain clearly that to keep them safe, information may need to be shared with those who can help. The child's welfare is paramount and overrides data privacy when necessary. Information will be shared only on a 'need-to-know' basis.
- **Do not confront the alleged perpetrator:** This task is exclusively for trained professionals like child protection workers or the police. Confronting an alleged perpetrator could create a risk to the child's safety.
- **Do not contact parents prematurely (unless directed):** Staff should not contact parents/carers themselves unless specifically directed by the Head of School, as informing parents prematurely may place the child at greater risk.
- **Tell the child what you plan to do next:** Advise the child that for them to be safe, their experience will need to be shared with another person (like the Executive Head, police, or child protection), and that you will support them through that process. Making sure the child is aware of each step can make the process less intimidating.

ii. Internal Reporting Process

Every adult in the Anfield community has an unavoidable, personal, and professional responsibility to protect children from harm. All staff, volunteers, and adults working with children must take immediate action if they have any concern that a child may be at risk of harm, abuse, or neglect. "If in doubt, report." It is always better to report early than to risk leaving a child in danger.

▪ Step 1 - Immediate Action:

- Report the concern immediately and without delay to the Head of School (DSL) or, if unavailable, to the Deputy Head (DDSL). Do not assume someone else will act.
- The Head of School will speak to the School Supervisor and Executive Head in person or by phone as soon as possible after the concern arises or disclosure is made.
- Suppose the child is at immediate risk of serious physical harm (e.g., physical danger, medical emergency, or requires urgent medical treatment). In that case, report to the Head of School and call 999 for the Police or Ambulance immediately to ensure his/her safety. Then, inform the School Supervisor and the Executive Head as soon as it is safe to do so.

▪ Step 2 - How to Report:

- Speak to the Head of School in person or by phone as soon as possible after the concern arises or disclosure is made.
- Following this verbal report, you must complete a written safeguarding concern form using the school's system (e.g., MyConcern or paper-based reporting).
- Your report must be factual, signed, and dated. Include:
 - ✓ What was seen, heard, or disclosed (using the child's exact words if possible).
 - ✓ The date, time, and location of the concern.
- Any immediate action you took at the time (e.g., comfort offered, separated child from others).

▪ Step 3 - DSL Review and Response:

- The Head of School will assess the concern in line with legal thresholds, particularly the definition of "serious harm" under Hong Kong's Mandatory Reporting of Child Abuse Ordinance (Cap. 650), Schedule 2.
- The Head of School will take immediate protective action if necessary (e.g., ensure the child's safety, isolate them from risk).
- The Head of School will consult the Executive Head and School Supervisor on all serious or complex cases.

- The Head of School will decide whether to:
 - ✓ Manage the concern internally, particularly for 'low-level concerns', with ongoing pastoral support and monitoring. All such concerns must be recorded securely to identify any patterns of inappropriate behavior and prevent escalation.
 - ✓ Refer to external agencies if the concern meets the 'serious harm' threshold or requires specialist intervention. This decision is made without delay.
- The Head of School will maintain confidential written records of all concerns, actions, decisions, and referrals. These records are kept securely and accessed only by authorised safeguarding staff.
- If a child transfers to another school (including in-year transfers), their child protection records will be securely and confidentially transferred to the receiving DSL, ideally within 5 working days for an in-year transfer or within the first 5 days of the start of a new term, to ensure continuity of care and appropriate support. Confirmation of receipt must be obtained.

iii. External Reporting and Mandatory Obligations

Anfield adheres to the Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650), which comes into effect on 20th January 2026. Although the Ordinance is not yet in force, Anfield adopts its standards immediately to prepare staff and prioritize student safety. This duty applies in addition to internal reporting procedures and cannot be replaced by informing a DSL or school leader alone.

▪ Legal Duty to Report:

- Under Cap. 650, specified professionals have a legal obligation to report child abuse that has caused, or is likely to cause, "serious harm".
- "Serious harm" is specifically defined in Schedule 2 of Cap. 650 and includes:
 - ✓ Any harm that endangers a child's life, or harm that endangers a child's physical health and requires urgent medical treatment
 - ✓ Harm that endangers a child's psychological health or development to a serious extent
 - ✓ Any harm caused by coercing or enticing a child to take part in sexual acts
 - ✓ Any harm caused by the neglect of a responsible person of a child that endangers the child's life or health
 - ✓ Other examples include life-threatening physical injury, sexual abuse or exploitation, severe emotional or psychological harm, extreme neglect or abandonment, and exposure to family violence
 - ✓ Staff should always consult the Head of School if uncertain whether a situation meets this threshold.

▪ **Circumstances Where Mandatory Reporting is NOT Required:**

- The Ordinance explicitly specifies situations where a specified professional is not required to make a mandatory report for suspected serious child abuse. These exclusions are as follows:
 - ✓ If the specified professional honestly and reasonably believes that the serious harm:
 - ❖ Was caused solely by an accident that is not caused by the neglect of a responsible person of the child
 - ❖ Was, or is to be, caused solely by the child himself or herself
 - ❖ Was, or is to be, caused solely by any other child, except if caused by any act of a sexual nature
 - ✓ If an Authority (i.e., the Director of Social Welfare or the Commissioner of Police) has informed the professional at or before the material time of the same, or substantially the same, serious harm suffered by the child, or the same, or substantially the same, real risk of the child suffering serious harm.
 - ✓ If the mandated reporter or another mandated reporter has already reported the same, or substantially the same, serious harm suffered by the child, or the same, or substantially the same, real risk of the child suffering serious harm, at or before the material time.

▪ **Who Must Report (Specified Professionals):**

- Cap. 650 designates the following as "mandated reporters" (or "specified professionals"):
 - ✓ Registered teachers working in a specified school
 - ✓ Registered nurses or enrolled nurses
 - ✓ Registered social workers
 - ✓ Head of School
 - ✓ Administrators
 - ✓ Counsellors
 - ✓ Child care workers or supervisors
 - ✓ Registered doctors, dentists, pharmacists, midwives, medical laboratory technologists, Chinese medicine practitioners, and educational/speech therapists
 - ✓ Other professionals designated by regulation
- Other staff (e.g., teaching assistants, volunteers) must report directly to the Head of School if they suspect serious harm.

- **When to Report:**

- A mandatory report must be made "as soon as practicable" after the material time when the reasonable ground to suspect serious harm comes to the notice of a specified professional. This is ordinarily understood to mean within 24 hours.
- However, a delay in reporting may be legally permissible and necessary to protect the child's best interests, as outlined in Section 5 of the Mandatory Reporting of Child Abuse Ordinance (Cap. 650). In such instances, the specified professional must honestly and reasonably believe that the delay is in the best interests of the child AND have, during the delay, taken actions that are reasonably necessary in the circumstances to protect the interests of the child.
- Such immediate protective actions may include, but are not limited to, arranging urgent medical examination and treatment for physical injuries, stabilising the child's emotions in cases of distress or refusal to disclose, or securing a safe placement to prevent further contact with a suspected abuser.
- Staff should prioritise these immediate protective actions when necessary for the child's safety and well-being, ensuring that a formal report is made as soon as practicable thereafter, without delaying for further investigative steps that are the purview of authorities.

- **How to Report (Step-by-Step Mandatory Reporting Process):**

- **Identify a concern:** Based on observation, disclosure, or information received
- **Inform the Executive Head immediately:** If the concern involves the Head of School, report directly to the Executive Head or School Supervisor
- **Assessment:** The Head of School will determine if the case meets the threshold for serious harm and requires external reporting. If so, the Head of School will coordinate the mandatory report process, ensuring the mandated reporter who formed the reasonable grounds fulfills their legal obligation to make the report.
- **Make the report to either Authority:** In Hong Kong, this is to the Director of Social Welfare or the Commissioner of Police.
 - ✓ **Step 1: Verbal/In-Person Contact (for Non-Emergency Situations):** Mandated reporters must first contact the Authority (Director of Social Welfare or the Commissioner of Police) by phone or in person. This involves calling the Social Welfare Department Hotline (2343 2255) to reach an FCPSU social worker (Family and Child Protective Services Unit, which is part of the Social Welfare Department) or contacting a Police Station directly. Submitting a report solely in writing may delay intervention and follow-up.

- ✓ **Step 2: Written Report via Reporting Platform:** Following initial verbal/in-person contact, the mandated reporter must then submit a report in writing through the Reporting Platform – Mandatory Reporting of Child Abuse as soon as practicable. An access code will be provided by the Authority to facilitate this written submission. This platform is designed for submitting information securely and is available to dovetail with the commencement of the Ordinance on 20 January 2026.
- **Record the incident:** Document actions taken, and referral made, using the school's safeguarding reporting system.
- **Essential Information for External Reports**
 - When making an official report to the Authority (the Director of Social Welfare or the Commissioner of Police), mandated reporters should gather and provide the following essential information. While it is helpful to have as much detail as possible, it is not strictly necessary to have every detail when making an initial call, especially in urgent situations, as the priority is child protection. The Authority may contact the mandated reporter for additional information.
 - This report must contain:
 - ✓ Sufficient information to identify the child concerned
 - ✓ The ground to suspect that the child is suffering serious harm or is at real risk of suffering serious harm
 - ✓ The contact information of the specified professional making the report
 - **In addition, the following information, subject to case circumstances, would be helpful to include:**
 - ❖ **Regarding the Suspected Incident:**
 - ✓ Nature and brief account of the incident
 - ✓ Frequency of similar incident(s)
 - ✓ Identity and number of the alleged perpetrator(s)
 - ✓ Date/time of the incident, including the earliest, most recent, and most severe incident
 - ✓ Location of the incident
 - ✓ Any other person present at the scene or aware of the incident, and their response(s) and action(s) taken
 - ❖ **Regarding the Child:**
 - ✓ Name, date of birth/age
 - ✓ Any disability or special needs
 - ✓ Current whereabouts
 - ✓ Any physical injury currently sustained
 - ✓ Behavioural/emotional conditions of the child
 - ✓ Whether the child is in immediate danger
 - ✓ Name of school/child care centre

❖ **Regarding the Family:**

- ✓ Name and Hong Kong Identity Card number of parents/carers and other relevant parties
- ✓ Name and age of other children in the same family, and whether they are at risk or potentially at risk of maltreatment
- ✓ Significant persons who can help the child or family concerned (e.g., family members, relatives)
- ✓ Whether the family concerned has previously been involved in or suspected of child maltreatment
- ✓ Social service that the child and/or the family currently receives

❖ **Regarding the Mandated Reporter:**

- ✓ Name, contact telephone number, and profession
- ✓ How the mandated reporter found out about the incident and actions taken
- ✓ Whether this is an individual reporting or team reporting

▪ **Team Reporting and Individual Liability:**

- Anfield recognises that in situations where multiple mandated reporters within the same unit or organization have reasonable grounds to suspect serious child abuse, a coordinated approach to reporting may be beneficial. To facilitate this:
 - ✓ A designated team member (such as the School Supervisor, Executive Head or Head of School) may make a call to the Authority and complete the report in writing on behalf of other team members. This process is supported by a specific report template designed for team reporting to avoid repeated submissions of the same case.
 - ✓ However, it is crucially important for all mandated reporters to understand that they are personally liable under the Mandatory Reporting of Child Abuse Ordinance (Cap. 650) to make a report. This legal obligation does not rest with the team they work for, nor can it be replaced by merely informing a Head of School or school leader alone.
 - ✓ Therefore, while a designated team member may coordinate and submit the report, the personal legal obligation and accountability to ensure the report is made rests with each individual mandated reporter who forms the reasonable grounds to suspect serious harm.
 - ✓ No person, including an employer or supervisor, must wilfully inhibit or obstruct a specified professional from making a report, nor impose any guideline or requirement that has such an effect. Organisations are encouraged to draw up guidelines for team reporting that ensure compliance with these requirements.

- **Failure to Report and Penalties:**

- Under Cap. 650, failing to report serious child abuse without a lawful excuse is a criminal offence.
- The penalty can be a fine of up to HK\$50,000 and/or imprisonment for up to 3 months.
- Examples of legal defenses include genuinely believing another mandated reporter has already made the report, or that delay was necessary to avoid further harm and protective steps were taken. These are judged on a case-by-case basis.

iv. Escalation Routes

While the primary route for reporting concerns is to the Head of School, it is essential to have clear alternative channels to ensure that no concern goes unaddressed, particularly if the usual channels are compromised.

- **If the Allegation Involves a Staff Member (including the Head of School):**

- If an allegation involves a member of staff (including the Head of School), or if a staff member feels unable to report directly to the Head of School (e.g., due to conflict of interest, discomfort, or a belief that their genuine concerns are not being addressed internally).
- The concern must be escalated immediately to:
 - ✓ The Executive Head
 - ✓ The School Supervisor
- Direct Reporting to External Authorities:
 - ✓ Staff also have the explicit right and legal protection under Hong Kong's Mandatory Reporting of Child Abuse Ordinance (Cap. 650) to report directly to the Director of Social Welfare or the Police if they suspect a child is at risk of serious harm, even if internal school procedures are still in progress.
 - ✓ This legal protection ensures staff can act to protect a child without fear of liability, provided the report is made in good faith. This aligns with best practice to "never do nothing" if a Head of School/Deputy Head is unavailable and a child is in immediate danger.

v. Confidentiality, Information Sharing, and Protection for Staff

Anfield is committed to balancing the need for confidentiality with the paramount importance of protecting children, fostering a "no blame" safeguarding culture.

▪ Balanced Confidentiality:

- Safeguarding concerns are treated with the utmost confidentiality and professionalism.
- Information will be shared only on a 'need-to-know' basis. Fearing to share information must not prevent necessary action to safeguard a child.
- The welfare of the child is paramount and overrides data privacy when necessary.

▪ Protection for Staff:

- The Hong Kong Mandatory Reporting of Child Abuse Ordinance (Cap. 650) provides explicit protections for specified professionals who make a report in good faith.
- These protections include a prohibition on inhibiting or obstructing a specified professional from making a report.
- A person who makes a report in good faith is protected from civil or criminal liability.
- Their identity will be kept confidential (unless a court orders otherwise or in specific, lawful circumstances).
- Staff will not be penalised by the school for raising concerns in good faith. The school's Whistleblowing Policy further reinforces this commitment, ensuring individuals feel safe and confident to report concerns, including those about colleagues or senior leadership.

vi. Record Keeping

Accurate, detailed, and secure record-keeping is fundamental to effective safeguarding, ensuring continuity of care and accountability.

▪ Content of Records:

- All concerns, discussions, and decisions made, and the reasons for those decisions, must be recorded in writing.
- Records should include: a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of any action taken, decisions reached, and the outcome.
- When recording disclosures, staff should use the child's exact words where possible.

- **Security and Access:**

- Records must be kept confidential and stored securely.
- It is good practice to keep concerns and referrals in a separate child protection file for each child, distinct from their main academic file.
- Only authorized safeguarding staff should have access to these files

- **Transfer of Records:**

- When a child leaves the school (including in-year transfers), their child protection file must be transferred to the new school as soon as possible, and within 5 working days for an in-year transfer or within the first 5 days of the start of a new term.
- Secure transit must be ensured, and confirmation of receipt obtained from the receiving school. This prevents a lack of information from impacting the child's safety, welfare, and educational outcomes.

F. ONLINE SAFETY AND FILTERING & MONITORING SYSTEMS

Anfield recognises that online safety is a critical component of its safeguarding responsibilities. Children today face a wide and evolving range of risks in digital environments, both within and outside of school. Therefore, the school is committed to implementing a proactive, whole-school approach to managing online harms, in line with Keeping Children Safe in Education (KCSIE 2024) and best international practice.

The 4Cs Framework of Online Harm

Anfield adopts the “4Cs” framework to define the key categories of online risk:

- i. **Content** – Being exposed to illegal, inappropriate, or harmful material (e.g., pornography, self-harm sites, extremism)
- ii. **Contact** – Being subjected to harmful online interaction with others (e.g., grooming, cyberbullying, predatory behaviour)
- iii. **Conduct** – Online behaviour that increases risk or causes harm (e.g., sexting, oversharing, harassment)
- iv. **Commerce** – Exposure to online gambling, scams, phishing, and commercial exploitation.

These risks can overlap and escalate quickly. Our safeguarding system is designed to respond with both technological and human vigilance.

1. Explicit Commitment to Effective Filtering and Monitoring

The school maintains robust filtering and monitoring systems across all school devices and networks. These systems are:

- Designed to limit children’s exposure to harmful and inappropriate online material.
- Regularly reviewed for efficacy, configuration accuracy, and system coverage.
- Monitored to detect unusual or concerning online behaviour.

The School Board holds strategic responsibility for ensuring these systems are procured, deployed, maintained, and audited effectively.

2. Staff Awareness and Understanding

Technology alone does not safeguard students – staff must also be able to use and respond to it properly. To this end:

- The SMT, IT support, and all relevant staff are trained to understand the school’s filtering and monitoring system.
- Training includes:
 - What the systems do and do not block or detect
 - How alerts are generated
 - How thresholds are set or changed
 - What to do when a breach or red flag occurs

The Executive Head and Head of School are specifically expected to maintain technical understanding of these systems in their safeguarding oversight role.

3. Management and Escalation of Concerns

All staff are trained to:

- Recognise alerts, anomalies, or reports generated by filtering and monitoring tools
- Take appropriate steps to escalate concerns via the internal safeguarding procedures – usually via the MyConcern
- Understand the difference between routine alerts and safeguarding-critical incidents, and respond accordingly

Technical issues are logged and referred to the IT team. Safeguarding-related alerts are recorded and investigated in line with policy.

4. Clear Assignment of Roles and Responsibilities

The following responsibilities are formally assigned:

Role	Responsibility
IT Support Lead	Maintains and configures the filtering and monitoring systems, responds to technical faults.
Head of School	Oversees alerts and risk trends from a safeguarding perspective; escalates serious risks.
Senior Management Team	Ensures staff are trained and aware, sets strategic direction, and responds to safeguarding escalations.
Teachers, TAs and Support Staff	Stay vigilant to online risks during classroom use; report any alerts or red flags immediately.

These responsibilities are reviewed annually and documented in the Safeguarding Operations Manual.

5. Training and Continuous Improvement

- Online safety is part of every staff member's safeguarding training, with role-specific detail for Head of School, Senior Management Team, teachers and IT personnel.
- All training includes:
 - Real examples of alerts and incidents
 - How to interpret system data and act on it
 - Scenario-based escalation simulations
- Training is refreshed at least annually, and immediately after any significant update to the system.

G. AFTER A MANDATORY REPORT: WHAT HAPPENS NEXT

Once a mandatory report of suspected serious child abuse or real risk of serious harm has been made to the Authority (the Director of Social Welfare or the Commissioner of Police), the process shifts to external agencies for their investigation and intervention. Understanding these subsequent steps provides staff with a holistic view of the child protection process:

- **Initial Screening and Enquiry:**

- Upon receiving a mandatory report, the Police and/or the Family and Child Protective Services Unit (FCPSU) of the Social Welfare Department (SWD) will conduct an initial screening, either jointly or separately. They may contact the mandated reporter for additional information or clarification to facilitate their assessment and follow-up actions.

- **Immediate Child Protection Actions and Joint Investigation:**

- In urgent situations where a child is in immediate danger or requires rescue, urgent medical treatment, or law enforcement, the Police and/or FCPSU will take immediate protective actions to safeguard the child's safety and well-being.
- For cases involving suspected criminal elements, the Police, potentially through a Child Abuse Investigation Unit (CAIU), will proceed with a criminal investigation.
- The Police and FCPSU may jointly take immediate child protection actions, which can include admitting the child to the hospital for medical examination/treatment, assessing temporary accommodation with relatives/friends, or arranging removal to emergency residential services or a place of refuge for protection.
- Mandated reporters may be required to cooperate by providing statements or additional information to assist in the investigation.

- **Multi-disciplinary Case Conferences (MDCCs):**

- A Multi-disciplinary Case Conference on Protection of Child with Suspected Maltreatment (MDCC) will typically be convened by the Social Welfare Department.
- The purpose of the MDCC is to discuss the follow-up plan for the child and their family, involving professionals from various disciplines who have direct knowledge of the child and family, or who can offer professional advice.
- Mandated reporters who fall into specific categories (e.g., direct knowledge of the child, providing relevant information/advice, or involved in follow-up services) may be invited to attend these MDCCs to contribute their professional knowledge and insights.

- **Service Provision and Collaboration:** Following the MDCC, if the mandated reporter's role includes providing follow-up services to the child or family, they are expected to collaborate with other professionals to implement the formulated child protection plan. This ensures a coordinated approach to supporting the child's recovery and long-term well-being.

REVIEW

The Mandatory Reporting Policy is submitted annually, or following any significant changes, to the School Board and signed off by the School Supervisor. The School Board will ensure that any faults are rectified, by the Executive Head, the Heads of School and the School Supervisor responsible for Child Protection following their review.

This policy was approved by:

School Supervisor: Ms. Angela Lee

Signed: 

School Supervisor

Date: *August 2025* 

Policy to be reviewed: **August 2026**

