

# Hong Kong Pony Club Safeguarding Policy

Version 01 dated 6<sup>th</sup> April 2020



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The Hong Kong Pony Club (HKPC) acknowledges the duty of care to safeguard and promote the welfare of its members and is committed to ensuring safeguarding practices that reflect international best practice.

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# Policy Statement

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**Every participant in HKPC's activities is entitled to a safe and motivating environment, and to be provided with the highest possible standard of care.**

HKPC is committed to implementing this Safeguarding Policy to safeguard all Vulnerable Persons from harm and abuse.

1.1 The purpose of this policy is:

- to protect Vulnerable Persons who participate in activities with HKPC;
- to provide all Volunteers with the overarching principles that guide our approach to safeguarding;
- to promote best practice in providing Participants with appropriate safety and protection;
- to allow all Volunteers to make informed and confident responses to specific child protection issues; and
- to protect HKPC from the damage that can be caused by allegations of abuse.

1.2 Every Volunteer must adhere to this policy to protect Vulnerable Persons and report any concerns about their welfare. This policy applies to all Volunteers. It aims to help Volunteers understand what they need to do, and what they can expect of one another with regards to safeguarding.

1.3 This policy recognises that the welfare and interests of Vulnerable Persons are paramount in all circumstances. It aims to ensure that all Vulnerable Persons regardless of age, ability or disability, gender, race, religion or belief, sexual orientation, or socio-economic background will have a right to equal protection from all types of harm or abuse; as well as an equally positive and enjoyable experience of participating in HKPC activities in a safe environment.

1.4 We acknowledge that some children and adults can be particularly vulnerable to abuse and we are committed to taking reasonable and appropriate steps to ensure their welfare.

1.5 As part of our Safeguarding Policy we will:

- promote and prioritise the safety and wellbeing of Vulnerable Persons and take all reasonable steps to protect them from harm and abuse;
- ensure all Volunteers understand their roles and responsibilities in respect of safeguarding and have signed the Safeguarding Policy.
- ensure all Volunteers are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and vulnerable adults;
- ensure appropriate action is taken in the event of incidents and/or concerns of abuse and support those who raise or disclose concerns;
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored;
- prevent recruitment of unsuitable individuals;
- ensure that all Volunteers will be protected from having to take unnecessary risks that may leave them open to accusations of abuse and
- maintain openness with parents, guardians, carers and all Stakeholders.

# Definitions

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For the purpose of this policy, the following general definitions apply:

- “Children” and/or “young person” are persons under the age of 18.
- “Adults” are persons aged 18 or over.
- “Vulnerable Persons” are children and other persons (whether children or aged 18 and over) whom, because of disability, illness, learning difficulties or any reason, has difficulties to take care of them and/or protect themselves against harm and exploitation.
- “HKPC” refers to The Hong Kong Pony Club.
- “Activity venue” encompasses any venue at which HKPC activities are held.
- “We” refers to the combined efforts of the HKPC.
- “Volunteers” refers to all people who do work with/ for HKPC whether paid or unpaid, including committee members, executives, examiners, parents, former and current member, contractors and visiting coaches.
- “Safeguarding Officer” or “SO” refers to the HKPC District Commissioner.
- “Safeguarding Committee” or “SC” refers to the subset of HKPC Committee members appointed to manage safeguarding.
- “Participant(s)” refers to all persons taking part in HKPC activities whether or not they are paid up members of the Hong Kong Pony Club.
- “Stakeholders” include but are not limited to the Hong Kong Equestrian Federation, Hong Kong Jockey Club, Riding for the Disabled Association and private riding schools, etc.
- “Position of trust” is the position an adult has over a child if they regularly teach, train or supervise the child in certain settings or when in certain roles.

Abuse is any form of physical, emotional or sexual mistreatment that may lead to injury or harm. Abuse can happen to a person of either gender, regardless of age, race or ability. Both men and women can perpetrate abuse. Sexual abuse can be perpetrated by someone of the same gender as the victim.

## Definitions of standard abuses

### 2.1 Physical abuse:

Actual or likely physical injury, or failure to prevent physical injury, or suffering.

### 2.2 Mental/ Emotional abuse:

Actual or likely severe adverse effect on the emotion and behaviour of a Vulnerable Person, including persistent or severe emotional ill treatment, shaming or rejection.

### 2.3 Sexual Abuse

Actual or likely involvement of Vulnerable Persons in sexual activities regardless of whether or not there is consent, including sexual grooming, which are actions or behaviours designed to entice, encourage or persuade a Vulnerable Person into inappropriate and/or unlawful sexual activity.

### 2.4 Neglect

The persistent or severe neglect of a child or the failure to protect a child from exposure to any kind of danger.

### 2.5 Bullying

Physical actions intended to intimidate and harm, verbal intimidation such as racist and sexist remarks and emotional intimidation such as isolating or exclusion, whereby the child or vulnerable adult experiences deliberate hostility. Bullying may be instigated by adults and/or children.

# Examples of Standard Abuses

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## Physical Abuse

- ❑ Physical punishment as discipline (strictly prohibited).
- ❑ Over training or dangerous training.
- ❑ Failure to do a risk assessment of physical limits or previously disclosed medical conditions.

## Mental/ Emotional Abuse

- ❑ Shaming as a form of motivation.
- ❑ Persistent failure to show respect e.g. ignoring or isolating.
- ❑ Humiliating by actions or words to convey that a person is unworthy or inadequate.
- ❑ Refusing participation in a group activity.
- ❑ Pushing a person to perform unreasonably beyond their skills ability or developmental capability.

## Sexual Abuse

- ❑ Exposure to sexually explicit language or jokes.
- ❑ Showing pornographic material or using Vulnerable Person to produce such material.
- ❑ Sexual intercourse and/or sexual activity with any person under 16 years of age.

## •Neglect

- ❑ Exposure to extreme weather e.g. heat.
- ❑ Failing to seek medical attention for injuries or illness.
- ❑ Exposure to risk of injury through use of unsafe equipment.
- ❑ Exposure to a hazardous environment without a proper risk assessment of the activity.
- ❑ Failing to provide adequate water when needed.

## •Bullying

- ❑ Using physical, mental or emotional abuse from other children/ Vulnerable Persons.
- ❑ Cliques resulting in exclusion of Vulnerable Persons.
- ❑ Encouragement of bullying as a form of motivating a Vulnerable Person to improve their performance in a team.

# Implementation of protection protocols (1)

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**All Volunteers must read and sign the Safeguarding Code of Conduct before beginning any form of work. Concerns and questions should be raised with the SO.**

## 3.1 Promoting Good Practice

Early intervention is good practice. It is the responsibility of all Volunteers to identify and report any forms of misconduct and possible abuse, or action that may lead to abuse and act if they have concerns about the welfare of the Vulnerable Person.

## 3.2 Venue Safety

- All venues will undergo relevant risk assessments.
- Hot Weather Riding Rules and Storm Warning Guidelines will be followed to determine if the weather is not suitable for HKPC activities.
- Where possible, we strive to limit the ratio of responsible adults to children to a safe and manageable number. For example, during riding activities, this ratio should not exceed 1:8.

## 3.3 Abuse of Trust

Abuse of trust is unacceptable. Sexual activity between an adult in a position of trust and the children and young people in their care is deemed to be an abuse of trust and exploitation, even if the child or vulnerable adult is over the age of consent. The HKPC treats coaches and other Volunteers as being in a position of trust.

Volunteers should ensure they maintain healthy, positive and professional relationships with all Participants. The responsibility to maintain ethical, professional boundaries in relationships with the students lies completely with the Volunteer.

Volunteers must not engage in sexual/romantic relationships with any Participant.

## 3.4 Travel and events

Training and events for Participants could require national and international travel and overnight stays. Every effort will be made to safeguard Vulnerable Persons while travelling. Therefore, a Code of Conduct for Travel will be agreed and signed by both the adult leaders and the Vulnerable Persons before every trip.

### Protocols for overseas travel:

- Parental consent form should be completed for all Participants under 18 years of age with the following information:
  - Acceptance of the Code of Conduct for Travel,
  - Emergency contact numbers (at least two),
  - Medical information or information relating to an impairment or disability,
  - Any other factors that may affect the child or vulnerable adult.
- All drivers must have a valid driver's licence, and vehicles must be roadworthy. Avoid the use of private vehicles where possible, unless this involves parents carrying their own children and any other children by private agreement with another parent.
- Where possible mixed gender groups should be accompanied by at least one male and one female Volunteer.
- There should be a sufficient ratio of Volunteers to participants on any trip. At least two adults should be supervising children or vulnerable adults at all times.
- Room sharing among different genders is not allowed (except parent sharing a room with his/ her own children only). Trip supervisors must never share a room with any Participant on a trip.

# Implementation of protection protocols (2)

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## 3.5 Disabled Riders

The parent, carer or guardian of disabled riders are encouraged to be present and attentive at all times for the following reasons:

- Disabled riders may require assistance for care and handling, some of which can be of an intimate nature.
- They may be unable to understand the inappropriateness of the actions or communicate to others that something is wrong. The parent/carer could assist with communication sharing.
- Special care could be taken by the parent or carer to ensure the disabled rider is able to cope physically and emotionally with the pace of training, and the lessons remain a positive experience.
- Possible failures to recognise the impact of harm or abuse on children with disabilities, as they may not display signs of hurt or abuse, or they may be misinterpreted.
- They may be unable to resist abuse due to physical impairment, parent/carer could be present to step in on their behalf.
- Negative attitudes toward those with disabilities could be recognised and reported.

Individual training programmes should be created and tailored to the abilities of disabled riders.

## 3.6 Safeguarding Code of Conduct

**Please refer to the HKPC Safeguarding Code of Conduct in Appendix 1.**

## 3.7 Digital Images and Social Media

Volunteers must abide by the following media guidelines when taking, sharing or using photographs or media in relation to HKPC:

Photography:

- Use of phones, recording devices and cameras inside changing areas, showers and toilets is strictly prohibited at all times. None of these devices should be visible or in use in these areas, as it is possible to secretly take footage if devices are present.
- All photos and media of children and adults should be respectful, appropriate, and relevant to the nature of the HKPC activity, and not in any way disparaging or humiliating.
- Vulnerable Persons must be appropriately dressed when being photographed. Images should be neither sexual, of an exploitative nature nor open to misuse.
- Parents must be informed that relevant photos may be taken and used to promote the HKPC. Should a child or the parents of a child wish not to have their photo taken or published by HKPC, their wishes should be upheld, and the child has the right to be excused from group photos.

Social Media and the Internet:

- Volunteers must never send any inappropriate or sexually provocative messages or images to Vulnerable Persons.
- The use of social media and the internet for the HKPC should always be respectful and appropriate, and should not in any way disparage or humiliate anyone.

# Recruitment and appointment of Volunteers

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## 4 Safeguarding appointment of Volunteers

The HKPC has effective recruitment and selection procedures for Volunteers. The following safeguarding measures apply to the recruitment process. These will apply to all Volunteers, regardless of how often they come into contact with Vulnerable Persons.

- Suitably qualified people will be appointed to coach and supervise HKPC activities.
- Specific written references may be required and where available, applicants will be required to submit a relevant background check.
- **Each applicant will be asked to fill out a Safeguarding declaration statement. (Appendix 2)**
- A risk assessment of any concerning information will be held and decisions made and documented.

If appointed, the new Volunteer will sign the Safeguarding Code of Conduct and be made familiar with the safeguarding policies and procedures through one on one or group training. Appointees will be properly trained in their duties.

These procedures will be followed consistently for all recruitments regardless of pre-existing relationship or how well they are known to the HKPC.

# Reporting and Responding to allegations and incidents of abuse

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## 5 Reporting and Responding to allegations and incidents of abuse

The HKPC encourages all Volunteers to report perceived abuse, actions that could or may lead to abuse, mild or serious misconduct or any non-compliance with this Policy to the SO. Volunteers may become aware of possible abuse or harm in various ways. Any reported suspicions and allegations will be taken seriously.

**Please refer to the Incident Communication Flow Diagram in Appendix 3.**

5.1 The following process is to be followed in the case of an allegation or suspicion:

- Assess if a Vulnerable Person is in danger, requires urgent medical attention or in need of immediate protection. If YES, take them immediately to a safe place and call the police and/or ambulance. Do not leave them alone but stay with them or leave them in the care of a responsible adult.
- As soon as possible report to the SO. The SO should complete an Incident Report Form without delay (Appendix 4.) Strictly confine the report to the facts and accurately distinguish between what is personal knowledge and what others have said. Do not include opinions. Any report may be required to be submitted in court if there is a criminal trial.
- After receiving the Incident Report Form, the SC will review and decide on the type and category of the case and the next steps.

5.2 The following process is to be followed in the case of a Vulnerable Person disclosing to a Volunteer an allegation of abuse, questionable behaviour or harm:

While with the Vulnerable Person:

- listen, showing that you are taking the disclosure seriously,
- stay calm, do NOT act frightened, angry or anxious, try to give a calm appearance,
- keep questions to a minimum, so that there is a clear accurate understanding of what has been said. Only ask questions to clarify what has been said. Do not ask leading questions,
- do not push for information, the child or vulnerable adult can disclose as much as they want to,
- do not make any promises. Inform the child or vulnerable adult that you have to inform other people about what they have disclosed in order to help them,
- reassure the person that they are not to blame and that it was right to tell,
- do not take notes while talking to the child but as soon as possible after the discussion write down all the details that can be remembered.

The SO will remind the reporting person of the confidentiality of the report and agree to inform them of the outcome of the investigation. All information provided will be kept in strict confidence by HKPC and will not be disclosed to any third party unless there is a requirement to do so.

The SO and SC will follow the mandated procedure and protocol for processing reported allegation, suspicion or disclosure of an incident

Under no circumstances should the reporting Volunteer confront the accused or investigate the matter themselves.

# Training and Communication

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## 6 Training of Volunteers

Newly appointed Volunteers will receive the training and education that is essential for implementation of the Safeguarding Policy.

The Code of Conduct will be displayed publicly and prominently on the HKPC website. These will be displayed in both English and Chinese.

## 7 Communication Guidelines

### 7.1 Regarding Child Welfare

- Parent/ guardian of the Vulnerable Person involved will be informed immediately, if appropriate.
- A formal meeting will be arranged with the Vulnerable Person and his/her parent/guardian and the SC.
- Offer to parents/guardian that the child or vulnerable adult be assessed by a qualified professional.
- If a case goes to the police, the HKPC will fully cooperate with any follow up actions required.

### 7.2 Confidentiality

Information will be handled and disseminated on a need to know basis only in order to protect the child or vulnerable adult, and protect the rights of the alleged perpetrator.

### 7.3 Personal Data (Privacy) Ordinance

The Personal Data (Privacy) Ordinance provides specific exemption for collection of data and transfer of information under Part 8 of the Ordinance, such that personal data of the victim and any other relevant persons may be disclosed to the police if the disclosure of information is relevant to the prevention or detection of crime, the apprehension, prosecution or detention of the offender, or the prevention, preclusion or remedying of unlawful or seriously improper conduct etc. (section 58(2)).

# Management Structure

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## 8 Management Structure

### 8.1 The Safeguarding Committee(SC) :

- District Commissioner
- HKPC Secretary
- HKPC Chief Examiner

### 8.2 A review of these procedures will be undertaken:

- following the completion of a case,
- changes in legislation and/or government guidance,
- guidance as issued by Hong Kong Sports Institute (HKSI) or
- as a result of any other significant change or event,
- or otherwise every three years.

## 9 Document Control

Approval			
Version	Approval Date	Approver	Signature
1.0	06.04.20	District Commissioner	Approved