



Hong Kong China Skating Union Safeguarding Policy

1. Policy Statement

- 1.1 Hong Kong China Skating Union (hereinafter referred to as the "HKSU") has been promoting the development of skating in Hong Kong. We believe that every participant in skating, including minors (under 18) and adults, deserves respect. Any form of harm, abuse, or harassment is a violation of participants' rights and detrimental to the overall development of skating. HKSU is committed to providing all participants with a safe, inclusive, and respectful environment that encompasses figure skating, short track speed skating, and speed skating.
- 1.2 HKSU adopts a zero-tolerance approach and has established a "Safeguarding Policy" in accordance with the International Skating Union (ISU) safeguarding guidelines, the standards of the Sports Federation & Olympic Committee of Hong Kong, China (SF&OC), and the laws of Hong Kong. This policy aims to clarify the definitions of abuse, provide guidance and explain the principles for responding to and handling abuse cases, and establish a code of conduct and reasonable measures to enhance the protection of participants. It ensures that all relevant individuals associated with the Union prioritize the well-being of participants in accordance with all procedures and guidelines, allowing participants to enjoy skating and reach their full potential.

2. Policy Scope

This Safeguarding policy applies to the HKSU, the Executive Committee, all committees, coaches, referees, athletes, staff, members, volunteers, and any individuals associated with HKSU, including team personnel, parents/guardians and caregivers of athletes, as well as anyone involved in Union activities. All individuals bound by this policy must comply with and enforce the established "Safeguarding Policy." Any violations of this policy may result in disciplinary action or other appropriate sanctions.

This policy also covers all activities organized by HKSU, including various training sessions, competitions, training camps, events, and online interactions with HKSU.

3. Definitions

3.1 Minors and Adults

- i. Individuals under the age of eighteen are considered minors. Parental or guardian consent is required for participation in activities, medical care, and travel. If abuse is suspected, it must be reported to statutory bodies (e.g., Social Welfare Department).
- ii. Individuals aged eighteen and above are considered adults. They can make independent decisions and may designate emergency contacts. Internal reporting is required only in cases where criminal intent is suspected.



3.2 Abuse

- i. Refers to actions taken by individuals (individually or collectively) that exploit the power differences inherent in their relationship with another person (such as age, status, knowledge, or organizational role), placing the other person in a vulnerable situation.

3.3 Physical Harm/Abuse

- i. Refers to any intentional act or action against the will of another that uses violence or causes bodily injury or suffering to that person (such as hitting, kicking, using objects to strike, poisoning, choking, burning, etc.), where there is clear evidence to confirm or reasonably suspect that these injuries were not accidental.

3.4 Sexual Abuse

- i. Refers to any coercion or inducement of another person to engage in sexual activities for the purpose of sexual exploitation or violation, where the other person does not consent or is unable to fully understand or comprehend the sexual activities occurring to him/her due to immature mental development. These sexual activities include acts with or without direct physical contact (such as rape, oral sex, inducing another to engage in masturbation/show their genitals or perform lewd acts/watching others engage in sexual activities, producing pornographic materials, coercing another to engage in prostitution, inappropriate touching, or displaying pornographic materials, etc.).
- ii. Sexual abuse may occur at home or elsewhere, or through online social platforms, conducted individually or in an organized manner, including enticing the other person to engage in abuse through rewards or other means. It also includes the deliberate establishment of a relationship and/or emotional connection with the intent to sexually abuse the other person, using various methods (such as communicating via mobile phone or the internet) to gain the other person's trust.

3.5 Neglect

- i. Refers to the severe or repeated neglect of another person's basic needs, failing to provide the minimum level of physical or emotional care, resulting in harm, allowing harm to occur, or creating an immediate risk of harm. This typically pertains to the care provided by parents or caregivers to minors but can also refer to others responsible for caring for individuals, such as coaches or team leaders caring for athletes. This includes failing to provide adequate food and water in high-temperature environments, sufficient clothing in cold environments, appropriate food, shelter, or a safe environment, including safe travel arrangements.



3.6 Psychological Harm/Abuse

- i. Refers to repeated behaviors and/or interaction patterns between a caregiver and another person that harm or damage the physical and mental health of the individual (including emotional, cognitive, social, or physical development); or extreme incidents. Psychological abuse can lead to the individual feeling frightened or withdrawn, causing long-term and severe negative impacts on their development.

3.7 Bullying

- i. Most bullying behaviors include the following three elements:
 - Repetitive occurrence—Bullying behavior occurs repeatedly over a period of time, rather than being a single, isolated incident.
 - Malicious intent—The bully deliberately harasses and harms others.
 - Power imbalance—The bully is clearly stronger than the victim, and the bullying occurs when the victim is unable to protect themselves.
 - Only when all three indicators are present can it be defined as bullying. In summary, bullying refers to the behavior of one person or a group of people who intentionally harm or oppress others, using strength to exploit the weak or overwhelming the few.

3.8 Protection

- i. Refers to the procedures for safeguarding vulnerable individuals, minors, and adults from harm, harassment, or exploitation. When the physical and mental safety of participants may be threatened or harmed, professionals must take appropriate actions, coordinate with each other, and collaborate to address the current crisis faced by the participants, ensuring their physical and mental safety. Proactive measures must be taken to prevent abuse, harassment, or exploitation, and to prevent participants from being harmed again. Protecting participants is an essential measure and may require referral to relevant protection agencies or law enforcement for more professional assistance.

3.9 Safeguarding Policy

- i. The safeguarding policy is a set of clear standards and guidelines that establish all environmental measures and activity designs within the organization to ensure the safety of participants, protecting them from harm or abuse, and creating a safe and friendly environment where everyone is respected and valued.

4. **Roles and Responsibilities of HKSU**

Members of HKSU's Executive Committee strictly implement the safeguarding policy and conduct regular reviews.

4.1 All Executive Committee members must:

- i. Develop, approve, and review appropriate safeguarding policies and measures, and



allocate resources to promote and implement these policies and measures.;

- ii. Sign and adhere to this safeguarding policy and the HKSU's code of conduct, following the guidelines outlined in the safeguarding notice (Appendix 1)
- iii. Ensure that all relevant individuals comply with and enforce the contents of the safeguarding policy, mandating adherence to the Union's code of conduct and fostering mutually respectful relationships with participants;
- iv. Ensure that all newly hired coaches and staff understand this policy;
- v. Regularly organize ongoing training for coaches and staff on safeguarding participants/minors;
- vi. Monitor the implementation of the overall safeguarding policies and measures, receiving reports from safeguarding officers for follow-up and improvement;
- vii. Conduct risk assessments during training, activities, or competitions to ensure that participants are protected and can engage safely;
- viii. Receive investigation reports from safeguarding officers and process any suspected abuse or harm incidents according to procedures, assisting in the preservation of all confidential reports and records;
- ix. In accordance with the HKSAR's Personal Data (Privacy) Ordinance, Chapter 486, Schedule 1, outline how data users should collect, process, and use personal data, and ensure proper storage of all personal data of participants in training, activities, or competition plans;
- x. Ensure that coaches and staff respond to and report all suspected or known incidents of participant harm or abuse as required by this policy.

4.2 Coaches and Staff

- i. Sign and adhere to this safeguarding policy and the code of conduct for registered coaches and staff, following the guidelines outlined in the safeguarding notice (Appendix 1);
- ii. Maintain vigilant regarding risks and crises related to safeguarding participants in daily operations, activities, training programs, or competitions;
- iii. Comply with the "Rule of Two," avoiding private or non-public environments for one-on-one interactions, and respect participants' autonomy without engaging in any coercive or manipulative behavior.

4.3 Safeguarding Officers (SOs)

HKSU appoints at least two Executive Committee members, committee members, or staff to lead the team in implementing safeguarding policy work (referred to as "Safeguarding Officers"). Their responsibilities include:

- i. Ensuring that all training, activities, or competitions organized by HKSU effectively



- implement the safeguarding policy;
- ii. Providing support and advice to HKSU's Chairperson, Executive Committee, and staff on matters related to the safeguarding policy;
- iii. Ensure that all coaches and staff understand the safeguarding policy upon their hiring;
- iv. Assisting HKSU in monitoring the implementation of overall safeguarding policy measures, reporting to the Chairperson and Executive Committee, and recommending follow-up actions and improvements;
- v. Address incidents of suspected abuse or harm, producing investigation reports for the Executive Committee and assisting in the preservation of all confidential reports and records;
- vi. With the Chairperson's approval, representing HKSU to refer cases of suspected abuse or harm to local statutory bodies, such as the Social Welfare Department, Hong Kong Police Force, or Child Abuse Prevention Association for investigation and follow-up, when there are reasonable suspicions;
- vii. Continuously obtain the latest information and knowledge regarding safeguarding minors from international and local sources, and provide relevant training or briefings to HKSU.

4.4 Recruitment

HKSU implements comprehensive safe recruitment practices for all coaches and staff, with the following measures:

- i. All recruitment advertisements and promotions will include a statement that "All applicants must agree to undergo a review under the Sexual Conviction Record Check mechanism if hired."
- ii. Applicants for any positions involving close contact with minors (whether coaches, Executive Committee members, referees, or staff) must undergo background checks/criminal record checks. Applicants may be required to attend an interview, provide references, and participate in orientation training upon hiring. Interview questions may involve personal background, past experiences, and knowledge of the safeguarding policy. The identity of references may need to be verified and should be current or former employers or individuals with relevant experience. Orientation training will ensure that hired individuals clearly understand their roles and responsibilities, along with information regarding safeguarding policies and procedures.

4.5 Education and Training

- i. Regular training on the safety and protection of minors will be provided for coaches and staff to ensure that all coaches and staff are familiar with HKSU's Code of Conduct and the policies and procedures for the safety and protection of minors. They will be able to identify signs and symptoms of different types of abuse or harm,



handle disclosed information carefully, and comply with reporting procedures and confidentiality guidelines;

- ii. HKSU will regularly conduct training or briefings on the safeguarding policy for the Executive Committee, all committees, coaches, referees, athletes, staff, and members;
- iii. Newly registered coaches and staff will receive training or briefings on the relevant safeguarding policy as part of their orientation training;
- iv. Key information briefings will be provided to volunteers, vendors, and contractors to help them understand the standards and practices of HKSU's safeguarding policy.

4.6 Code of Conduct

- i. HKSU places great importance on the ethical conduct of coaches, staff, and related individuals, and the Code of Conduct is an essential part of this. Establishing relevant behavioral standards helps build a good governance culture, making it easier for HKSU to address behavioral incidents involving these individuals;
- ii. HKSU requires that the Executive Committee, all committees, coaches, and staff sign the code of conduct and adhere to the guidelines outlined in the safeguarding notice (Appendix 1).

4.7 Risk or Crisis Assessment

HKSU is responsible for providing participants with a safe learning or training environment. Therefore, risk assessments can effectively reduce the occurrence of crises. Risk assessments can be conducted two months prior to activities, training programs, and competitions to review all potential crises and minimize their impact on participants.

4.8 Confidentiality

- i. Personal information obtained during performing duties must be kept confidential, as privacy rights are protected under Article 14 of the Hong Kong Bill of Rights, the Personal Data (Privacy) Ordinance, common law, and professional ethics guidelines. However, in special circumstances, such as the need to disclose information to prevent foreseeable harm to participants, disclosure may be considered based on the situation. HKSU will make every effort to ensure the confidentiality of all involved parties' information;
- ii. Relevant information will only be processed as necessary for the following purposes:
 - Protecting the best interests of participants
 - Cooperating with case investigations
 - Managing related disciplinary matters
 - Safeguarding the rights of the accused;
- iii. Confidential information should not be discussed under any circumstances unless confidentiality can be ensured. Therefore, discussions of confidential information



should be avoided in public or semi-public places;

- iv. All relevant individuals' information will be stored in HKSU's office in accordance with data protection legislation, locked up, and accessible only to designated individuals when necessary;
- v. According to the exemptions regarding the collection and transmission of data under Section 486, Part 8 of the Personal Data (Privacy) Ordinance, if disclosing information relates to preventing or detecting crimes, arresting or prosecuting offenders, or eliminating or correcting unlawful acts (including punishment), then the relevant information may be exempt from the third data protection principles if applying those principles would likely harm the above purposes. Each case must be decided based on its individual circumstances.

4.9 Reporting Policy

i. Overview

HKSU is committed to maintaining good organizational governance, emphasizing accountability and high transparency to provide reliable and trustworthy activities, training programs, or competitions, with the welfare and safety of participants as the top priority. To uphold social responsibility, HKSU encourages a culture of openness and expects and encourages coaches, staff, and stakeholders (including service users, volunteers, vendors, and related individuals) to report any suspected misconduct related to abuse or harm. This policy also applies to members of the Executive Committee and management.

ii. Purpose

This reporting policy outlines HKSU's approach to reporting any suspected incidents of abuse or harm, the protections afforded to reporters, and the reporting channels and guidelines (see Appendix 2).

iii. Policy

HKSU requires coaches and staff to act professionally, with integrity and fairness. "Reporting" refers to any individual who becomes aware of or genuinely suspects that a coach, staff member, or related individual within HKSU has violated the code of this policy, engaging in suspected abusive or harmful behavior towards participants, and that such individuals have been found to violate the content of HKSU's safeguarding policy, prompting a report due to the seriousness of the concerns.

iv. Protection and Prevention of Retaliation

HKSU is committed to protecting individuals who make good faith reports and will take appropriate measures to ensure that coaches, staff, and stakeholders are free from retaliation or unfair treatment, including wrongful dismissal, unreasonable disciplinary action or harm, denial of services, or unfair treatment when providing services.



Any adverse actions against individuals who make good faith reports under this policy, including retaliation or threats of retaliation, are considered violations of this policy. HKSU reserves the right to pursue actions against such individuals.

v. Confidentiality

Unless required by law or for legal or audit purposes, HKSU will keep all reporting information confidential and will not disclose it unless necessary to refer the matter to regulatory or law enforcement authorities.

HKSU will make every effort to keep the identity of the reporter confidential unless disclosure is required by law or regulation.

To ensure that the investigation proceeds smoothly, the reporter must also keep confidential the details of the report, its nature, and the identities of the individuals involved, unless disclosure is required by law or regulation.

vi. Discovery of Suspected Abuse Cases

Suspected abuse cases can be discovered through various means, such as:

- a. Witnessing the incident firsthand;
- b. Being informed by a third party;
- c. Being told directly by the individual involved; or
- d. Receiving an anonymous allegation.

vii. Reporting Methods

Although HKSU does not require reporters to provide sufficient evidence for allegations of suspected abuse or harm to participants, to further process the report and handle the matter effectively, reporters should provide the following information as much as possible, within practical limits:

- The reporter's name
- The reporter's contact information (e.g., phone, email)
- Details of the report (e.g., names of individuals involved, time and place of the incident) and any other relevant evidence (e.g., documents, photos, recordings)
- Reporters can submit their reports to HKSU in writing via the following methods:
 - a. Email to safeguarding@hksu.org
 - b. Mail to Room 1023, Olympic Building, 1 Stadium Path, Causeway Bay, Hong KongAttention: Safeguarding Officer, Hong Kong China Skating Union
Please use a sealed envelope and mark it as "Confidential."

viii. Whistleblower Reporting



HKSU strongly encourages reporters to provide their name and contact information so that we can further understand the report and gather additional information. However, if reporters are unwilling to disclose their identity in certain circumstances, they may still report anonymously. HKSU allows anonymous reporting when there is sufficient evidence, but it should be noted that the report must contain adequate and detailed information for follow-up to be processed by HKSU.

ix. Handling

HKSU is committed to handling all reports of suspected abuse or harm with professionalism, rigor, and fairness, and will seek independent and professional advice as needed.

For non-anonymous reports, HKSU will confirm in writing to the reporter that the report has been received. After the relevant incident has been addressed, the reporter will also be notified in writing of the outcome.

The safety, needs, and well-being of participants are of utmost importance. When a participant indicates that they have been abused, staff or coaches should:

- a. Remain calm to avoid frightening the participant.
- b. Reassure the participant that telling someone about the incident is the right thing to do.
- c. Listen carefully to what the participant has to say, letting them know that the matter will be taken seriously.
- d. Minimize questioning to clearly and accurately understand what has been described. Only ask questions if clarification is necessary and avoid leading questions.
- e. Inform the participant that it is necessary to share what they have said with others to stop the abuse.
- f. If the participant requires emergency medical care, seek medical assistance immediately or contact emergency services.
- g. After ensuring the safety of minor participants, notify their parents/guardians and report to the Union within 24 hours, while keeping relevant records and reports.
- h. Refer adult participants to counseling or legal support with their voluntary consent, while making a confidential report to the Union's Safeguarding Officers.

x. Timeliness Principle

Abuse cases can create stress for all parties involved. HKSU is committed to addressing and following up on incidents immediately upon receiving a report.

xi. False Reporting

Reporters must make truthful reports. If a reporter maliciously or for personal gain makes a false report, HKSU reserves all rights to pursue actions, including reporting the incident to law enforcement and seeking restitution for any losses incurred due



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to the false report. Coaches, staff, or related individuals who make false reports may face disciplinary action, including dismissal, cancellation of registration, termination of collaboration, and prohibition from participating in any activities, training, or competitions organized by HKSU.

4.10 Policy Approval, Review, and Amendments

This safeguarding policy is reviewed annually by the HKSU's Executive Committee and may be amended as needed. HKSU reserves the right to make any modifications to this policy.

If there have any safeguarding concerns, any inquiries regarding this safeguarding policy and its measures, or if you need to make a related complaint, please contact HKSU at 2577 8010 or email safeguarding@hksu.org.



Protection Guidelines

Important Points
1. Work in public environments (e.g., avoid being alone with athletes or in situations without others present, and encourage open communication)
2. Make the training process positive and motivating
3. Provide professional, objective, and constructive feedback
4. Treat all athletes equally and with respect
5. Prioritize the well-being of athletes above winning competitions
6. Avoid unnecessary physical contact with athletes. If touching is required during training, it should be done publicly and only with the athlete's prior knowledge and consent
7. Obtain written consent from parents for youth athletes before going out for training or competitions
8. When leading mixed-gender teams, ensure that both male and female coaches/staff accompany the group

Avoidance Guidelines (Notes)
1. Do not spend unnecessary amounts of time alone with individual athletes
2. Avoid driving athletes alone in a car
3. Do not invite athletes to your home or residence alone
4. Do not invite athletes to your home or residence alone
5. Avoid engaging in rough games with athletes that involve physical contact, including playful wrestling
6. Do not allow athletes to use inappropriate language without intervention
7. Do not make sexual comments or tell sexual jokes to athletes (even if intended as a joke)
8. Do not make athletes cry as a means of manipulation
9. Do not ignore, fail to record, or respond to allegations made by athletes
10. Do not ignore, fail to record, or respond to allegations made by athletes
11. Do not ignore, fail to record, or respond to allegations made by athletes

Note: In unavoidable situations, such as having to drive an athlete alone in a car, the athlete and (for minor athletes) their parents/caregivers must be informed in advance and their consent obtained.



Handling Suspected Abuse or Harm Cases

According to Article 19 of the United Nations Convention on the Rights of the Child, children have the right to protection. Early identification and reporting of suspected cases of harm or abuse against children and adolescents can effectively prevent the worsening of issues and provide necessary assistance to those suspected of being harmed or abused.

The Hong Kong China Skating Union will adopt the 4Rs (Response, Record, Report, and Refer) to handle suspected abuse or harm cases:

Response

If staff, coaches, volunteers, or related individuals of HKSU discover signs of abuse or harm, they must respond swiftly and report the incident to the Union within 24 hours. When speaking with the suspected victim, they should remain calm. If the situation is extremely urgent, immediate action must be taken to notify the responsible person at HKSU.

Record

Staff, coaches, volunteers, or related individuals must document information regarding the suspected abuse or harm incident. Questions during interviews may include: What happened? Where did the incident occur? Were there other individuals present? When did it happen? The report must be submitted to the Safeguarding Officer of HKSU for preliminary evaluation.

Report

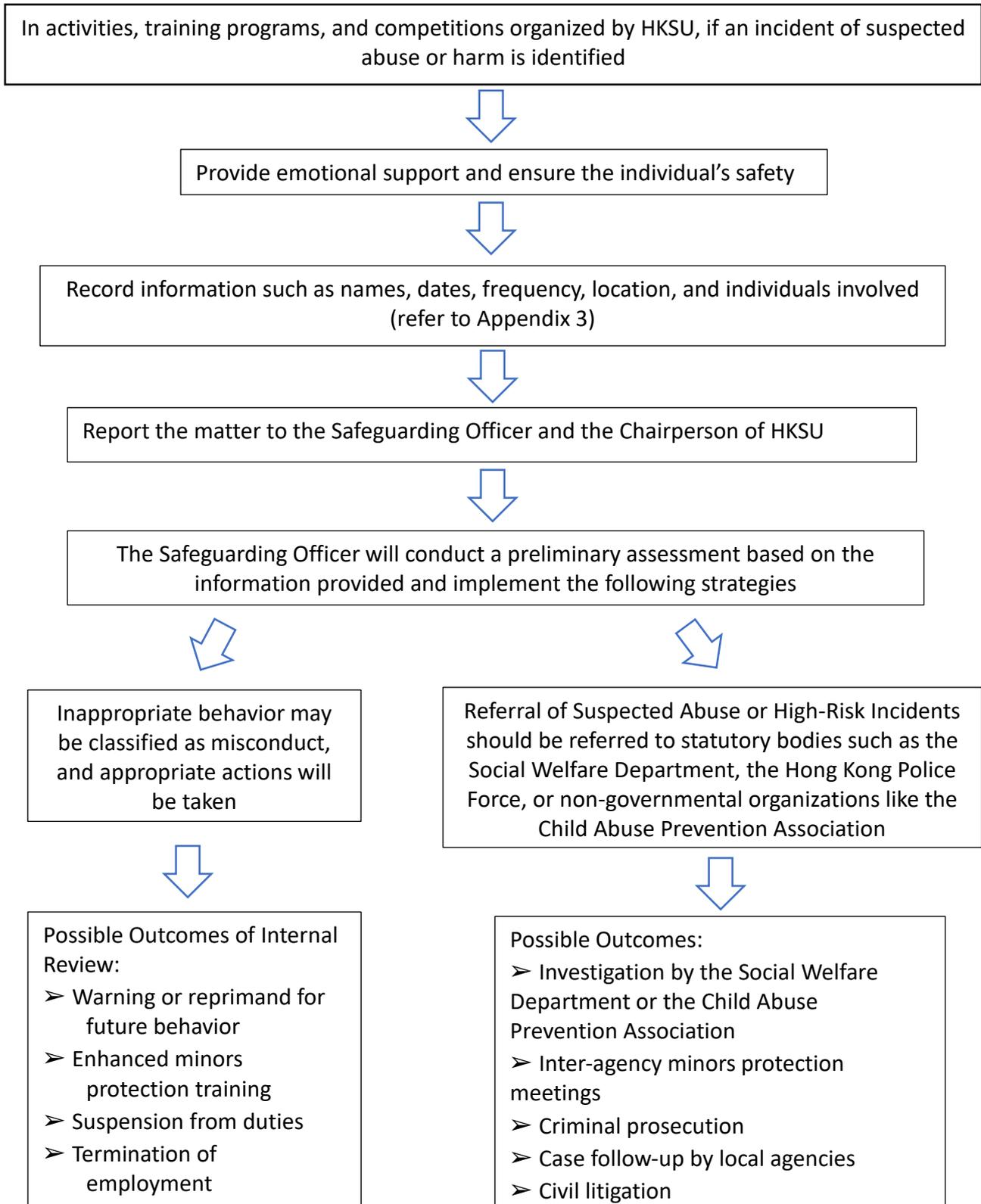
Staff, coaches, volunteers, or related individuals must report the incident to the Safeguarding Officer or the Chairperson of HKSU, who must respond within 48 hours of receiving the report. All reports must be archived and kept confidential. If the situation is very urgent, a response and handling must occur in the shortest time possible (within 2 hours)

Refer

The Safeguarding Officer must assess whether the incident constitutes an emergency or immediate danger. If so, it must be referred immediately to the Social Welfare Department, the Hong Kong Police Force, or the Child Abuse Prevention Association for investigation and follow-up. Consent must be obtained from the parents or guardians of the minors or adolescent before referral. All information must remain confidential. ◦



Flowchart for Handling Suspected Abuse or Harm Cases





Report of Suspected Abuse or Harm Incident

Incident Report*

1. Date of Incident:

2. Time of Incident:

3. Location of Incident:

4. Names of Coaches or Staff Present:

5. Name of Affected Individual:

6. Injuries Sustained:

7. Detailed Description of the Incident:

8. Name of the Accused Individual:

9. Position of the Accused Individual:

Coach

Staff

Parent

Other: _____ (Please specify)

10. Notification to HKSU :

Yes

Date and Time :

Contact Information and Phone of HKSU :

No

11. Actions Taken :

Referred to the Social Welfare Department

Referred to the Police

Referred to the Child Abuse Prevention Association

None (Reason:)

12. Signature of the Person Completing the Report:

Name of the Person Completing the Report:

Position of the Person Completing the Report:

Contact Information of the Person Completing the Report:

Date of Report Completion:

*Reports of suspected abuse or harm incidents must be submitted within 12 hours of the incident occurring.