香港賽馬會
The Hong Kong Jockey Club

Children and Vulnerable Adults Safeguarding Policy

Version 1.6

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Distribution List
Head Of Equestrian Affairs (HOEA)
Beas River Equestrian Centre (BREC)
Public Riding Schools (PRS)
Pony World
Safeguarding Officers (SO) and Safeguarding Committee (SC)

The Hong Kong Jockey Club
Equestrian Affairs Department
Children and Vulnerable Adults Safeguarding Policy | 2026

The Equestrian Affairs Department (EAD) of the Hong Kong Jockey Club (HKJC) acknowledge the duty of care to safeguard and promote the welfare of children and vulnerable adults and are committed to ensuring safeguarding practices that reflect international best practice.

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1 Policy Statement

Every equestrian rider at the HKJC is entitled to learn and train in a safe, motivating environment and be provided with the highest possible standard of care. The EAD of the HKJC are committed to implementing this Safeguarding Policy to safeguard children and vulnerable adults from harm and abuse.

1.1. The purpose of this policy is:

- to protect children and vulnerable adults when receiving training or services from the EAD or when participating in equestrian or related activities overseen by the EAD;
- to provide all staff with the overarching principles that guide our approach to safeguarding;
- to promote best practice in providing riders with appropriate safety and protection under their coaching or training programmes and competitions;
- to allow all staff to make informed and confident responses to specific child protection issues; and
- to protect HKJC from the damage that can be caused by allegations of abuse.

1.2. Every EAD staff member must adhere to this policy to protect children and vulnerable adults and report any concerns about their welfare. This policy applies to all staff, including management, employees, volunteers, contractors and visiting coaches, students or anyone working on behalf of the EAD. This policy aims to help staff members understand what they need to do, and what they can expect of one another with regards to safeguarding. It focuses on safety requirements and makes clear what individuals and organisations should do or should not do to keep children and vulnerable adults safe.

1.3 This policy recognises that the welfare and interests of children and vulnerable adults are paramount in all circumstances. It aims to ensure that all children and vulnerable adults 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 riding or equestrian 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 children and vulnerable adults and take all reasonable steps to protect them from harm and abuse;
- ensure all staff understand their roles and responsibilities in respect of safeguarding and have signed the Safeguarding Policy.
- ensure all staff 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 provided to the staff who raise or disclose the concern;
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored;
- prevent the employment of unsuitable individuals, and execute appropriate consequences or termination of employment for misconduct;

- ensure that all staff, including management, employees, volunteers, contractors and visiting coaches, students or anyone working on behalf of the EAD 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.

2 Definitions

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

- "Adults" are persons aged 18 or over.
- "Children" and/or "young person" are persons under the age of 18.
- "Coaches" refers to all teachers, instructors and trainers in equestrian activities under the EAD.
- "Contractors" refers to contractors engaged by the Club who have direct contact with children or vulnerable adults in provision of the service.
- "EAD" refers to the Equestrian Affairs Department.
- "EDR" refers to HKJC's Executive Director, Racing.
- "Equestrian activities" includes riding lessons, stable management lessons, pony parties, equine practical lessons, BHS Stage training and BHS Stage exams or any other equestrian related activity under the EAD.
- "Equestrian premises" encompass Beas River Riding School, Beas River Equestrian Centre, the three Public Riding Schools, Tuen Mun, Lei Yue Mun and Pokfulam and Pony World.
- "FEI" refers to Fédération Equestre Internationale.
- "HKJC" refers to The Hong Kong Jockey Club.
- "HKSI" Hong Kong Sports Institute.
- "HOEA" refers to Head Of Equestrian Affairs.
- "HR" refers to HKJC's Human Resources Department.
- "Participant(s)" refers to all persons taking part in equestrian activities and/or training and riding or stable management lessons.
- "Position of trust" is the position an adult has over a child if they regularly teach, train, supervise or have sole charge of the child in certain settings or when in certain roles.
- "SIIS" refers to the Security, Integrity and Information Security Department.
- "Safeguarding Committee" or "SC" refers to the management committee appointed to manage safeguarding, make decisions and manage the safeguarding situations that arise.
- "Safeguarding Concern" means any suspicion or allegation of actions or behaviour that could or may lead to abuse, mild or serious misconduct or any non-compliance with this policy.
- "Safeguarding Officer" or "SO" refers to the person allocated and trained in each equestrian premises to promote safeguarding, handle safeguarding issues, reports and disclosures.
- "Staff" refers to all EAD employees, including management, staff, volunteers, contractors and visiting coaches, students or anyone working on behalf of the EAD, or employees of HKJC who visit the premises of the EAD on a regular basis.

- "Stakeholders" including but not limited to; HKSI, the Equestrian Federation of Hong Kong, China, Riding for the Disabled Association and private riding schools in Hong Kong, etc.
- "Vulnerable adults" are persons aged 18 or 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.
- "We" refers to the combined efforts of the EAD.

Child abuse is any form of physical, emotional or sexual mistreatment that may lead to injury or harm. It more commonly occurs within a relationship of trust or responsibility and is an abuse of power and a breach of trust. Abuse can happen to a child of either gender or a vulnerable adult, regardless of age, gender, race or ability. Both men and women can perpetrate abuse. Sexual abuse can be perpetrated by someone of the same gender as the victim.

2A. Abuse, Neglect and Bullying

2A.1 Abuse

There are a number of forms of abuse. The main forms are set out below with non-exhaustive examples of how such forms of abuse can happen in equestrian and related activities.

(a) Physical abuse:

Actual or likely physical injury, or failure to prevent physical injury, or suffering, including, but not limited to, deliberate hitting, beating, slapping, shaking, throwing, burning, drowning, suffocating, poisoning and corporal punishment.

Examples of Physical Abuse:

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

(b) Mental/ Emotional abuse:

Actual or likely severe adverse effect on the emotion and behaviour of a child/vulnerable adult caused, including persistent or severe emotional ill treatment, shaming or rejection. This may involve conveying that they are worthless, unloved or inadequate and cause them to feel frightened, in danger and/or corrupted or acting in a way that is detrimental to the self-esteem of the child or vulnerable adult.

Examples of Mental/ Emotional Abuse:

- Shaming as a form of motivation.
- Persistent failure to show any respect to a child or vulnerable adult e.g. continually ignoring or isolating him/her.
- Humiliating a child or vulnerable adult by actions or word that convey that they are unworthy or inadequate.
- Refusing to allow a child or vulnerable adult to participate in a group activity.
- Pushing a child or vulnerable adult to perform unreasonably beyond their skills ability or developmental capability.

(c) Sexual Abuse

Actual or likely exploitation, representing the involvement of children and vulnerable adults in sexual activities they do not truly comprehend, that are illegal or that violate social taboos, such as the touching of genitals, being forced to watch or take part in pornography or coercing the child or vulnerable adult to have sexual activity of any kind. It is legally and socially considered abuse regardless of whether or not the child or vulnerable adult consents, as children and some vulnerable adults are not able to give informed consent.

Sexual grooming are actions or behaviours designed to entice, encourage or persuade a child or vulnerable adult into inappropriate and/or unlawful sexual activity, and are an abuse.

Examples of Sexual Abuse:

- Exposure to sexually explicit inappropriate language or jokes.
- Showing a child or vulnerable adult pornographic material or using a child or vulnerable adult to produce such material.
- Sexual intercourse and/or sexual activity with a child under 16.

2A.2 Neglect

The persistent or severe neglect of a child or vulnerable adult or the failure to protect a child or vulnerable adult from exposure to any kind of danger, including physical harm, cold and starvation, or extreme failure to carry out important aspects of care, resulting in the significant impairment of development, including non-organic failure to thrive.

Examples of Neglect Abuse:

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

2A.3 Bullying

Actions, regardless of whether they constitute physical, mental or emotional abuse 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.

Abuse may be instigated by one or more adults and/or other children or vulnerable adults.

Examples of Bullying:

- Children or vulnerable adults using physical, mental or emotional abuse against another child/vulnerable adult.
- Cliques form, excluding certain children or vulnerable adults.
- Encouragement of bullying as a form of motivating a child or vulnerable adult to improve their performance in a team.

3 Implementation of protection protocols

All staff and contractor of the EAD must read the Safeguarding Policy and sign the Safeguarding Declaration Form before beginning any form of work (whether paid or unpaid) and subsequently once every three years. They must comply with the Code of Conduct contained in the Safeguarding Declaration Form. Safeguarding Concerns and questions should be raised with the assigned SO.

3.1 Promoting Good Practice

Early intervention is good practice. It is the responsibility of all staff 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 child or vulnerable adult.

3.2 Venue Safety

All equestrian premises will undergo relevant risk assessments and will all be equipped with fire extinguishers and first aid kits.

All external contractors, media representatives and members of the public will be able to see relevant Codes of Conduct for Protecting Children/Vulnerable Adults on display at all equestrian premises.

Hot Weather Riding Rules and Storm Warning Guidelines will be followed to determine if the weather is not suitable for equestrian activities.

Where possible strive to limit the ratio of staff to children to a safe and manageable number. For riding lessons, this will 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 (i.e. 16). The EAD treats coaches and other staff as being in a position of trust.

Coaches and other officials in a position of authority should ensure they maintain healthy, positive and professional relationships with all participants. The coach is placed in a position of trust, guardianship and authority over the students. All coaches must be aware of their professional roles, responsibilities and appropriate relationship boundaries with students. The responsibility to maintain ethical, professional boundaries in relationships with the students lies completely with the coach.

Coaches do not engage in sexual/romantic relationships with current students.

3.4 Travel and events

Training and events for riders could require national and international travel and overnight stays. Trips away can offer many young people exciting and positive experiences, however, they also bring particular challenges for those charged with their care. Every effort will be made to safeguard the children or vulnerable adults while travelling. Therefore, a Code of Conduct for Travel will be agreed and signed by both the adult leaders and the children or vulnerable adults before every trip.

Protocols for overseas travel:

- It is good practice to meet with the parents and riders before the trip. Arrangements can be explained and discussed including the need for medical information, confidentiality issues and

consent forms. For all riders under 18 years of age, and vulnerable adults, a parental consent form should be completed and should include the following information:

  - Acceptance of the Code of Conduct for Travel,
  - Emergency contact numbers (at least two),
  - Any specific medial information or information relating to an impairment or disability,
  - Information about 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 to transport children where possible, unless this involves parents carrying their own children and any other children by private agreement with another parent, rather than at the request or on behalf of the EAD.
- Adult drivers should not be alone with a child or vulnerable adult that they are not the parent of in a vehicle on journeys.
- Anyone acting in a supervisory capacity on a trip with children or vulnerable adults must have complied with the recruitment procedures outlined in Section 4 of this policy.
- Where possible mixed gender groups should be accompanied by at least one male and one female staff member. The profile of the trip will determine how many staff members are required and their differing responsibilities. The EAD should ensure that all staff have been properly inducted and have an understanding of this policy.
- There should be a sufficient ratio of staff to riders on any trip. This ratio can be difficult to prescribe, therefore regardless of the overall supervision ratio agreed, at least two adults should be supervising children or vulnerable adults at all times. This may include parents of children travelling with the group. Factors to consider when determining the ratio are: gender, age, ethnicity and ability of the group; riders with special educational or medical needs; riders who are deaf or disabled; duration and nature of the journey; competence and possible behaviour of the athletes; number of team managers, assistants, coaches and any specialist staff; experience of the staff members in supervising the type of event/journey.
- Room sharing among different genders and different age groups (under 18 sharing with over 18) is not allowed (except parent, a guardian, a carer or family member sharing a room with the children under his/her care). The trip supervisors must never share a room with a child, vulnerable adult or any student on the trip.

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, the parent or carer could take care of their personal needs, not the coach or staff member.
- 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 whether children or adults.

3.6 Code of Conduct for Protecting Children/Vulnerable Adults

You should:

- Treat children and vulnerable adults with respect and recognize them as individuals in their own right, teach them to know the rules implemented to keep them safe.
- Respect and nurture the trust of the children and vulnerable adults as well as the trust of their parents, taking all reasonable care to protect them from all forms of abuse while in your care.
- Ensure that the children and vulnerable adults understand the instructions that have been given to them, and that what is asked of them is age and skill appropriate, and can be reasonably expected. Always put the welfare of the children and vulnerable adults first, before winning or meeting expectations.
- Dress and act professionally at all times, appropriately for the situation.
- Be aware of the dangerous placement of equipment, taking necessary action immediately to avoid possible injury. Ensure equipment is correctly fitted for use.
- Supervise children at all times when they are in the restricted areas.
- Take children who are not listening or not following instructions or displaying uncooperative behaviour or who do not want to ride to wait out the remainder of their lesson in the office.
- Be visible to other adults when talking with children and vulnerable adults, e.g. keep the door open when meeting in a room.
- Be culturally sensitive to attitudes of physical contact. Touch should be age-appropriate and only the necessary amount for coaching, safety or medical needs.
- Be attentive to children or vulnerable adults' physical needs. Offer rest time and water breaks.
- Respect the right to privacy of the child or vulnerable adult and avoid asking questions of personal nature.
- Avoid questionable behaviour which could be misconstrued, such as flirting, joking or rough playing.
- Be accountable to each other so that any potentially abusive behaviour can be addressed.
- Create and maintain an open culture in which any issues or concerns can be discussed, and inform children or vulnerable adults of what they can do if they feel that there is a problem or difficulty.
- Correct any person's inappropriate behaviour immediately if there is a safety risk (e.g. injury by horses, equipment, etc.)
- Report to the SO if it is suspected a child or vulnerable adult may be hurt by any inappropriate or abusive actions or attitudes of another person.

It is NOT appropriate to:

- Match children and vulnerable adults to ponies or horses that are not appropriate for them, including size and temperament. If a suitable horse is unavailable, apologise and reschedule.
- Commence the class without the presence of a qualified instructor. Apologise and reschedule.
- Give gifts of any kind to the children or vulnerable adults, without the knowledge and consent of the parent.

- Give children or vulnerable adults your contact or social media details, e.g. personal email address, personal phone number, and any form of social media, including but not limited to Facebook, Twitter, Instagram account names.
- Communicate through electronic means directly with the children or vulnerable adult without parental knowledge and consent. Group communication, where possible, is preferable over individual communication.

You must never:

- Allow children or vulnerable adults to attend a lesson without PPE (personal protective equipment).
- Discriminate against, show different treatment to, or favour any particular children or vulnerable adults while excluding others.
- Act in ways that is abusive towards a child or vulnerable adult or places him or her at risk.
- Hit, assault or physically discipline a child or vulnerable adult in a way that is abusive. A general guideline is no physical punishment, hitting, slapping, spanking.
- Speak to a child or vulnerable adult in a disrespectful manner such as shouting, swearing or use of humiliating or shaming language. This will be interpreted as verbal abuse.
- Invite children or vulnerable adults to your home or place of residence, or meet them at any place outside of the equestrian premises of the EAD without the presence of their parents.
- Take advantages from children or vulnerable adults or their caregivers. Taking bribes is strictly prohibited.
- Touch children or vulnerable adults in a manner which is inappropriate. Avoid unnecessary touch. A general guideline is not to touch on the face, chest or bottom. Inappropriate touching includes kissing and tickling.
- Engage in any activity or use language that is flirtatious, sexually provocative, offensive or exploitative that could be seen as harassment, assault or abuse.
- Develop physical, sexual or romantic relationships with children under the age of 18 or vulnerable adults.
- Expose children or vulnerable adults to inappropriate materials such as pornographic or violent pictures, videos and literature.
- Excuse, or participate in, behaviour of children or vulnerable adults which is illegal.
- Be under the influence of alcohol or drugs.

3.7 Digital Images and Social Media

All media that is recorded by the public while children or vulnerable adults are riding/being in public as part of the activities of EAD, is in the public domain, and not the responsibility of the HKJC, e.g. at competitions, public arenas.

However, those who are bound by this Policy, including those taking photographs or media for HKJC's use, must abide by the following media guidelines when taking, sharing or using photographs or media in relation to EAD:

Photography:

- The 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, relevant to the nature of the EAD and/or a training exercise, and not in any way disparaging or humiliating. No photo or media of children or vulnerable adults should reveal excessive personal information, e.g. identity, school or place of residence.
- Children or vulnerable adults and adults 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 of the activities of EAD may be taken and used to promote the HKJC. Should a child or vulnerable adult, or the parents of a child or vulnerable adult wish to not have their photo taken or published by EAD, their wishes should be upheld where it is within HKJC's ability to do so, and the child or vulnerable adult has the right to be excused from group photos.

Social Media and the Internet:

- Staff must never send any inappropriate or sexually provocative messages or images to children or vulnerable adults.
- The use of social media and the internet for the EAD should always be respectful and appropriate, and should not in any way disparage or humiliate anyone.

4 Safeguarding through recruitment and appointment of staff

The HKJC has effective recruitment and selection procedures for both paid staff and volunteers. The following safeguarding measures apply to the recruitment process. These will apply to all staff of the EAD, as well as volunteers, regardless of how often they come into contact with children or vulnerable adults.

- Suitably qualified people will be appointed to coach children and vulnerable children.
- Specific written references may be required. A relevant background check will be arranged. The background check will be repeated once every three years for coaching staff.
- Each applicant will be asked to fill out a Child and Vulnerable Adults Safeguarding declaration statement. In this statement the following questions will be asked of an applicant:
    - Do you have criminal charges pending against you before the courts in Hong Kong or elsewhere? (excluding minor traffic offences).
    - Do you have criminal convictions or findings of guilt against you for sexual offences, offences related to children, or acts of violence in Hong Kong or elsewhere?
    - Do you have, or have you had, disciplinary proceedings brought against you by an employer, sporting organisation or similar body involving allegations of child abuse, sexual misconduct, sexual harassment, any other form of harassment, or acts of violence?
    - Have you participated in, facilitated, or encouraged practices prohibited by the World Anti-Doping Agency Code or any other approved anti-doping policy applicable to you?
    - Are you aware of any other matters which would make you unsuitable to work closely with children or young people?
    - Do you have, or have you had, disciplinary proceedings (including a ban) brought against you from the FEI or national competition as a result of an equine or human doping or equine medication violation?
- A risk assessment of any concerning information will be held and decisions made and documented.

- If appointed, the new staff member will sign the Safeguarding policy and the Code of Conduct during induction 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 existing staff or the organisation.

5 Reporting and Responding to Safeguarding Concerns

All staff must be aware of the definitions of abuse and other prohibited behaviours as described in Sections 2 and 2A. It is hereby stated that the EAD will not tolerate any form of these abuses or non-compliance of this policy, the procedures or the Code of Conduct. In all cases, the safety, needs, welfare and rights of the children and vulnerable adults will always be the priority.

While bringing issues on safeguarding of children or vulnerable adults to the attention of relevant people can be a difficult task, the EAD strongly request for the sake of the physical and emotional wellbeing of children and vulnerable adults, that all staff do report perceived abuse, actions that could or may lead to abuse, mild or serious misconduct or any non-compliance of this policy to the SO. By swiftly addressing behavioural issues, the behaviour can be rectified before it escalates to a point of abuse or harm to a child or vulnerable adult.

It is not the responsibility of anyone working for the EAD to either investigate or decide whether abuse against a child or vulnerable adult has taken place. However, we each have a responsibility to act on any concerns so that appropriate authorities can make enquiries and take necessary action to protect the child or vulnerable adult. Safeguarding Concerns should be taken seriously.

A person may be aware of possible abuse or harm in various ways. This person may see it happening, or it may be reported to the person by someone else or directly by the child or vulnerable adult affected.

5.1 <u>The following process is to be followed in the case of a Safeguarding Concern:</u>

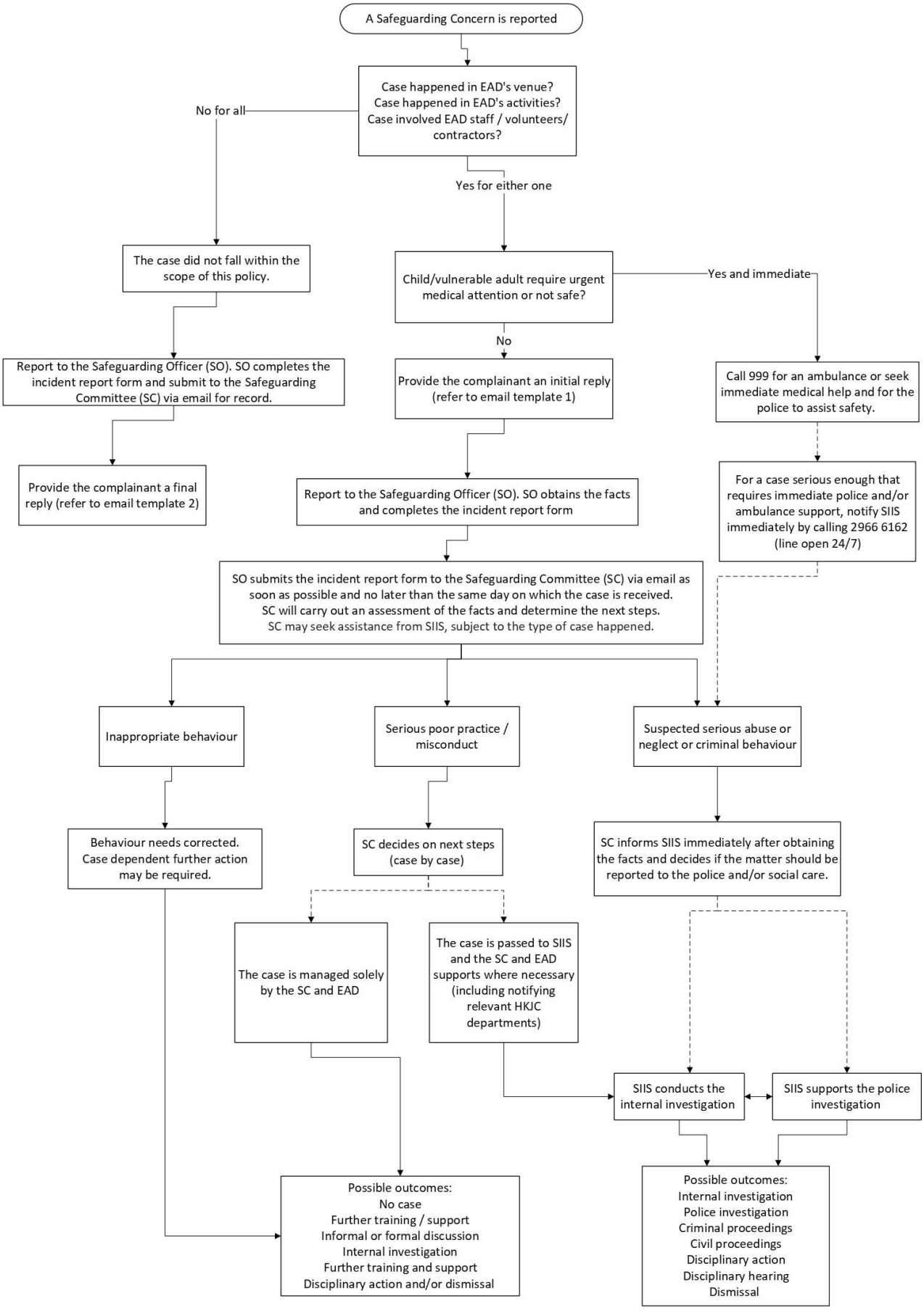
Please follow the incident communication flow.

- Assess if a child or vulnerable adult is in danger, requires urgent medical attention or in need of immediate protection. If YES, take the child or vulnerable adult immediately to a safe place and call the police and/or ambulance. Do not leave the child or vulnerable adult alone but stay with them or leave them in the care of a responsible adult.

- Should the incident require immediate police and/or ambulance support, inform SIIS immediately by calling the **emergency control line on 2966 6162 (open 24/7).**

- As soon as possible report to the SO. The SO should complete the Incident Report Form without delay. This report template is in Annex A. Strictly confine the report to the facts and accurately distinguish between what is personal knowledge and what others have said. Do not include opinions. Such report may be required to be disclosed to the relevant authorities for investigation or to relevant parties or in future legal proceedings.

- After receiving the Incident Report Form, the SC will review and decide on the type and category of the case and the next steps.


A Safeguarding Concern is reported
Case happened in EAD's venue?
Case happened in EAD's activities?
Case involved EAD staff / volunteers/ contractors?
No for all
Yes for either one
The case did not fall within the scope of this policy.
Child/vulnerable adult require urgent medical attention or not safe?
Yes and immediate
No
Report to the Safeguarding Officer (SO). SO completes the incident report form and submit to the Safeguarding Committee (SC) via email for record.
Provide the complainant an initial reply (refer to email template 1)
Call 999 for an ambulance or seek immediate medical help and for the police to assist safety.
Provide the complainant a final reply (refer to email template 2)
Report to the Safeguarding Officer (SO). SO obtains the facts and completes the incident report form
For a case serious enough that requires immediate police and/or ambulance support, notify SIIS immediately by calling 2966 6162 (line open 24/7)
SO submits the incident report form to the Safeguarding Committee (SC) via email as soon as possible and no later than the same day on which the case is received.
SC will carry out an assessment of the facts and determine the next steps.
SC may seek assistance from SIIS, subject to the type of case happened.
Inappropriate behaviour
Serious poor practice / misconduct
Suspected serious abuse or neglect or criminal behaviour
Behaviour needs corrected. Case dependent further action may be required.
SC decides on next steps (case by case)
SC informs SIIS immediately after obtaining the facts and decides if the matter should be reported to the police and/or social care.
The case is managed solely by the SC and EAD
The case is passed to SIIS and the SC and EAD supports where necessary (including notifying relevant HKJC departments)
SIIS conducts the internal investigation
SIIS supports the police investigation
Possible outcomes:
No case
Further training / support
Informal or formal discussion
Internal investigation
Further training and support
Disciplinary action and/or dismissal
Possible outcomes:
Internal investigation
Police investigation
Criminal proceedings
Civil proceedings
Disciplinary action
Disciplinary hearing
Dismissal

5.2 The following process is to be followed in the case of a child or vulnerable adult disclosing to a staff member a Safeguarding Concern:

- While with the child or vulnerable adult:
  - 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 the 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 HKJC 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.

These procedures are built on the best practice principle of minimising the need for the child or vulnerable adult having to repeat to multiple parties the information unnecessarily, thereby reducing further trauma.

Under no circumstances shall the reporting member of staff confront the accused or investigate the matter themselves. It is recognised that strong emotions can be aroused particularly in cases where sexual abuse is suspected or where there is misplaced loyalty to a colleague, adult or to a parent/carer who may be well known to us. It is important to understand these feelings but not allow them to interfere with your judgement about any action to take. Following the protocol will bring about the best result, protecting the child or vulnerable adult and bringing disciplinary or legal action against the perpetrator.

The current SO's are listed in Section 9 of this policy. If for any reason it is not possible to report to a SO, please direct the report to a member of the SC, first port of call is the Head Of, Equestrian Affairs.

6 Disciplinary procedures for misconduct

- Staff members may be temporarily suspended from duty pending investigation of a reported incident or serious allegation.
- The staff member may be subject to further disciplinary action.
- The staff member will be offered support, as appropriate and if feasible returning to work following leave or suspension.
- Where the allegation is of unsuitable behaviour that could lead to abuse or harm, the staff member will be interviewed and counselled according to the HKJC's existing disciplinary procedures.
- Where a formal child/vulnerable adult abuse allegation is made against one of HKJC's contractors, volunteers or coaches, HKJC will request the relevant person or company (if applicable) to be

removed from HKJC's premises, or from dealing with HKJC business. An internal review will be conducted.

If a staff member is found to have known about a child/vulnerable adult abuse or safety non-compliance situation and they fail to report the incident, this will also be treated as an act of misconduct and the staff member may be subject to internal disciplinary action.

7 Education and training of staff

- For relevant roles, newly appointed staff will receive, as part of their induction, the training and education that is essential to implementing the Safeguarding Policy. Included in the training will be behavioral guidelines and guidance on the acceptable and unacceptable sharing of information.

- For relevant roles, staff will be required to undertake relevant child protection training every 3 years to ensure their practice is exemplary and to facilitate the development of positive culture towards good practice of child and vulnerable adult protection. Attendance will be recorded at each such training and kept on file.

- The Code of Conduct will be displayed publicly and prominently at the office of each equestrian premises. These will be displayed in both English and Cantonese.

8 Communication Guidelines

8.1 *Regarding Child Welfare*

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

8.2 *Regarding the Organisation*

- The SC will assess each case and will decide whether which cases will be managed by the EAD or by HKJC's SIIS (with EAD support).
- The Public Affairs department will directly coordinate media communication and the Legal Services Department will provide support.
- All media statements regarding safeguarding or incidents thereof will be made through the Public Affairs Department or with their express approval.

8.3 *Confidentiality*

Every effort will be made to ensure that confidentiality is maintained for all concerned. Information will be handled and disseminated on a need-to-know basis only in order to protect the child or vulnerable adult, facilitate enquiries as well as manage the disciplinary/complaint aspects and protect the rights of the alleged perpetrator.

8.4 All information will be stored and handled in line with HKJC's Personal Data Privacy Standard.

8.5 The Personal Data (Privacy) Ordinance (Cap. 486 of the laws of Hong Kong) provides specific exemptions 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 used, disclosed and transferred for the purposes of 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. or when required by the laws or a court order in Hong Kong, in connection with any legal proceedings in Hong Kong or required for establishing, exercising or defending legal rights in Hong Kong (sections 58(2) and 60B).

8.6 The EAD will use reasonable efforts to ensure that individuals can raise a Safeguarding Concern in accordance with this policy without fear of victimisation, subsequent discrimination or other disadvantage. Whilst the EAD will make every effort to ensure that confidentiality is maintained for all concerned including the identity of the "whistle-blower", the investigation process might reveal the source of the information and a witness statement might be required as part of the evidence in a case. In such instances, the EAD will give advance notice of this to the person who made the report, and discuss what this will mean and any consequences arising.

9 Management Structure and Monitoring

9.1 *The Safeguarding Committee (SC):*

- Executive Manager, Equestrian Affairs
- Executive Manager, RESTART and Equine Welfare
- Executive Manager, Security Policy, Risk and Emergency Planning
- Executive Manager, Financial Crime Risk Investigations
- Senior Manager, Equestrian (BREC)
- Deputy Executive Manager, Human Resources (Business Facing)
- Manager, Equestrian Affairs Administration

9.2 *The Safeguarding Officers (SO's):*

- Alex Robinson-Barr, Senior Manager, Equestrian - BREC (Riding School)
- Bee Chan, Senior Manager, Equestrian – Tuen Mun PRS
- Kenny Wong – Riding Instructor – Lei Yue Mun PRS
- Nicola Craven, Senior Equestrian Coach – Pok Fu Lam PRS

9.3 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.

10 Document Approval

Approval			
Version	Approval Date	Approver	Signature
1.0	08.01.19	Executive Manager, Equestrian Affairs	Approved
1.0	17.01.19	Executive Director, Racing	Approved
1.1	11.06.20	Executive Manager, Equestrian Affairs	Approved
1.1	12.06.20	Executive Director, Racing	Approved
1.2	11.05.21	Head Of Equestrian Affairs	Approved
1.2	16.05.21	Executive Director, Racing	Approved
1.3	17.06.22	Head Of Equestrian Affairs	Approved
1.3	20.06.22	Executive Director, Racing	Approved
1.4	11.08.23	Head Of Equestrian Affairs	Approved
1.4	06.10.23	Executive Director, Racing	Approved
1.5	12.06.25	Head Of Equestrian Affairs	Approved
1.5	23.06.25	Executive Director, Racing	Approved
1.6	18.08.26	Head Of Equestrian Affairs	Approved
1.6	08.09.26	Executive Director, Racing	Approved

11 Annex

A. Template for incident reporting

Complainant's name:		**Date received:**
Role/Job Title		
Child/vulnerable adult's name:		**Age:**
Details of the incident/complaint: **What/When/Who/How?**		
Name and job title of person against whom the allegation is being made:		
Capacity of person against whom the allegation is being made:	☐ Parent/Guardian ☐ Client/Athlete ☐ HKJC coach/instructor ☐ HKJC employee ☐ Other	
Actions taken by person receiving the complaint:		
Immediate persons contacted:	**Name of person contacted:** **Date/time when contact was made:** **Method of communication (e.g. phone or in person):** **Advice given:**	
Brought to attention by: Name		**Position:**
Completed by SO: Name		**Position:**
Signed by SO: Signature		**Date:**
Received by SC: Name		**Date:**