



**RESPONSE TO THE PUBLIC
CONSULTATION OF THE 2023-2024
BUDGET**

**SUBMISSION BY
PLAN INTERNATIONAL HONG KONG**

INTRODUCTION

Plan International Hong Kong (“Plan International”) is submitting this briefing in response to the Hong Kong Special Administrative Region’s Government (“the Hong Kong Government”)’s invitation for public view of the 2023-2024 budget.

Plan International is an independent development and humanitarian organisation that advances children’s rights and equality for girls. Plan International initially operated a field office in Hong Kong from 1953 to 1973, helping nearly 12,000 local children and their families by providing support in education, food, healthcare, housing and career counselling. Plan International re-opened its Hong Kong office in July 2009, giving the Hong Kong community the chance to give back by supporting child development programmes in Asia, Africa, the Americas, Oceania and the Middle East.

Plan International Hong Kong advocates a holistic approach to protecting and promoting children’s rights through preventive and responsive measures so that all children can grow, thrive, lead and live in safety, free from harm, abuse and neglect. Committed to ending violence against children and promoting meaningful child participation, Plan International Hong Kong has rolled out local programmes and influencing work through evidence-based research, partnerships, policy influencing and public education since 2017.

This briefing covers the key issues of Plan International’s concerns and aims to provide recommendations for the Hong Kong Government’s preparation of the 2023-2024 budget.

These main recommendations include:

- **Budget for Child Safeguarding Policy implementation in all child-related organisations**
- **Budget for improving children’s eye-sight to mitigate the Covid-19 pandemic impact imposed on them**

Plan International welcomes the Hong Kong Government’s practice of conducting public consultations when drafting the Budget, and would appreciate any opportunity to present additional information, in writing or person, to the Hong Kong Government.

EXECUTIVE SUMMARY

This section serves to highlight Plan International's recommendations for the Hong Kong Government's preparation of the 2023-2024 budget.

A. The need for resources for Child Safeguarding Policy implementation in all child-related organisations

The recent child abuse scandal in Hong Kong Society for the Protection of Children ("HKSPC") and local research on risks of harm to children in educational institutions have pointed to the grave problem of institutional child abuse in Hong Kong, which requires the Government's urgent attention on providing a systemic solution to revamp the operation of child-related institutions at large.

To assure that children would enjoy the same level of safety across different child-related sectors, as well as witnessing the rising needs from these sectors for the implementation of Child Safeguarding measures, Plan International suggests the Government provide resources for child-related institutions to establish their own Child Safeguarding Policy ("CSP") to minimise risks of harm and abuse to children within the institution:

- a) Provision of resources for child-related organisations to recruit manpower and/or external consultants to assist in establishing and enforcing a set of Child Safeguarding Policy;
- b) Provision of additional resources for all child-related organisations to acquire Child Safeguarding training for all staff and related personnel who might have contact with children at work.

B. Budget for improving children's eyesight to mitigate the Covid-19 pandemic impact imposed on them

Multiple recent types of research, including the children-initiated research under the Voices of Children project supported by Plan International in 2022, reflected undoubtedly on the substantial impact on children caused by the Covid-19 pandemic. As an organisation focusing on children's rights, including their rights to participation, we are obliged to reflect the voices of local children on the difficulties they are facing as well as the solutions they long for:

- a) Provision of support for children's physical well-being by allocating resources to offer comprehensive optical examination for children aged 4-16 years old, with special subsidies of new optical aids for children from deprived families after their 3-year online learning mode under the Covid-19 pandemic, as well as strengthening eyesight protection knowledge via talks and public campaigns for parents and children.

SECTION I: THE IMPORTANCE OF CHILD SAFEGUARDING POLICY IN CHILD-RELATED ORGANISATIONS

BACKGROUND OF THE ISSUE

1. Recent news and research have pointed to the grave problem of institutional child abuse among different child-related sectors in Hong Kong, which demands immediate attention and actions by the Government.
 - 1.1 The recent succession of child abuse scandals in the Hong Kong Society for the Protection of Children (“HKSPC”) has exemplified the widespread problem of institutional child abuse in organisations providing residential child care services.¹
 - 1.2 Local research has also indicated an alarming trend of child abuse in the education sector as well. According to the Situation Analysis Study on Child Safeguarding Policy by Plan International Hong Kong, 1 in 5 (22.8%) of children had encountered at least one kind of harm in schools, private tuition centres or interest classes in the past six months, including ‘having intimate bodily touch with teachers’, ‘physical punishment by teachers’, ‘left out by teachers’ and ‘bullied by peers’. More alarmingly, 1 in 10 of the children (11.2%) had been physically punished in educational institutions², albeit the fact that corporal punishment has been legally banned in Hong Kong since 1991.
2. As described in the report released by the independent review committee which looked into the HKSPC incident, while the stories of child abuse are harrowing, what they have revealed are not only the suffering of individual children due to lapses of the judgement of a few child-related workers but a range of systemic institutional failure that facilitated harm and abuse to children in the first place.³ These institutional failure warrant a systemic solution that thoroughly improves the operation of a child-related institution and tackles child abuse at its core.
3. As a systemic measure to prevent institutional child abuse, there has been a **global trend for child-related organisations to establish their own Child Safeguarding Policy**

¹ 〈童樂居虐兒案再多一人認罪囚約 7 個月 官形容行為非文明社會所見〉。(2022 年 7 月 22 日)。《明報》。取自: <https://bit.ly/3JkCp2>

² Plan International Hong Kong. (September 2021). *Situation Analysis Study on Child Safeguarding Policy (Parents, Children and the Education Sector) Research Summary*. Retrieved from: https://www.plan.org.hk/wp-content/uploads/2021/09/CSP-Research_ES_EN_vf.pdf (Full report available at: https://www.plan.org.hk/wp-content/uploads/2021/09/PLAN_CSP_parent_children_survey-report_final_pori_.pdf)

³ Hong Kong Society for the Protection of Children. (January 2022). *Independent Review Committee Report Submitted to SWD, HKSPC Accepts IRC Recommendations to Drive Reform*. Retrieved from: <https://bit.ly/3SaitD>

(“CSP”) to minimise risks of harm and abuse to children within the institution according to prescribed national standards, particularly in Australia⁴ and England.⁵

4. Child Safeguarding Policy (CSP) is a set of clear standards and guidelines that minimises harm to children whom the organisation contact, by governing the behavior of staff and associates of the organisation, and embedding procedures to ensure concerns over a child’s welfare are swiftly responded to.

CHILDREN-RELATED ORGANISATION’S PERCEPTION AND STATUS ON CHILD SAFEGUARDING POLICY

5. From 2020 onwards, Plan International has made extensive efforts to conduct research to create an evidence-based framework for Child Safeguarding Policy to inform the Hong Kong community about the local gaps in child safeguarding (Appendix 1). With this new local framework, two Situation Analysis Studies were conducted (2019-2021) to benchmark the implementation of CSP measures in the sports sector and education sector, as well as understanding the opinions of the stakeholders on the development of child safeguarding movement in Hong Kong.
 - 5.1 For the sports sector, the study showcased that 80% of sports organisations interviewed agreed that the CSP allowed staff to differentiate appropriate and inappropriate behavior towards children and minimise harm to children yet nearly half (46%) of the sports organisations implemented less than half of the child safeguarding policy standards we proposed. 17% even implemented no formal child safeguarding measures to protect children’s safety in the institution.⁶
 - 5.2 For the education sector, nearly 80% of the interviewees agreed to the mandatory implementation of CSP in educational institutes. The CSP implementation status in the sector is also generally more promising: among the four sub-sectors, kindergartens scored the highest (14.8) for their implementation of the 20 CSP standards, followed by primary schools (13.0), secondary schools (12.1) and private tuition centres (8.7).⁷
 - 5.3 Many teachers also expressed in the interviews that they did not feel the Code for the Education Profession provided practical guidance on appropriate or

⁴ Australian Human Rights Commission. (2017-2018). *National Principles for Child Safe Organisations*. Retrieved from: <https://humanrights.gov.au/sites/default/files/National%20Principles%20for%20Child%20Safe%20Organisations.pdf>

⁵ UK Department for Education. (2018). *Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children*. Retrieved from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf

⁶ Plan International Hong Kong. (July 2020). Situation Analysis Study on Child Safeguarding Policy (Study with Sports Organisations in Hong Kong) Retrieved from: https://csnet.plan.org.hk/wp-content/uploads/2020/07/Situation-Analysis-Study-on-Child-Safeguarding-Policy-sports-organisations_Executive-Summary.pdf

⁷ In this research, the total score for Child Safeguarding Policy implementation is 20. Each score represents one child safeguarding measure. The total score for implementation in each dimension in Child Safeguarding Policy implementation is transformed to 10.

inappropriate behaviour with children. Although teachers were generally aware of their legal responsibility in safeguarding children, they were often uncertain about the proper boundaries of interacting with children and young people. As there are few clear child safeguarding standards and relevant training in the education sector, many teachers reported difficulties in protecting their reputation when they were taken to task and encountered challenges in intervening in incidents of harm to children in their schools.⁸

6. Both researches indicated recognition of CSP from both the Education and Sports sectors on its effectiveness and their willingness to adaption to a certain extent. Yet regarding the CSP implementation, both sectors expressed various difficulties and concerns including their lack or uncertainty of sufficient knowledge to implement CSP, as well as potential high administrative costs and lack of relevant resources to support CSP implementations for the Sports Sector; while for many teaching and management staff in the education sector, they are highly concerned on the increase of workload and pressure imposed on them if such implementation takes place.
7. The gaps and needs of relevant training for staff working in child-related organisations also went explicit :
 - 7.1 For the sports sector, 62% of them thought they did not have or were not sure if they had sufficient knowledge to implement CSP, reflecting that sports organisations have little knowledge or experience in implementing child safeguarding measures in the institution.
 - 7.2 For the education sector, there is still 40% of the interviewed organisations did not provide child safeguarding training to all staff and 50% not to volunteers and partners, indicating that nearly half of the child workers and people that might have frequent contact with children were not trained with any relevant knowledge before or during the commencement of their duties.
8. In conclusion, with many child-related organisation's rising awareness of the Child Safeguarding Policy and recognition of its effectiveness on children's well-being, most stakeholders addressed their needs for additional resources for manpower and resources in professional guidance as well as actual implementation, with training offering to all child-related workers/ personnel so as to equip everyone with the right attitude and knowledge in Child Safeguarding.

RECOMMENDATIONS FOR THE GOVERNMENT

9. Plan International acknowledges that the Government is actively considering the enactment of legislation on Mandatory Reporting Mechanism to motivate individual child-related workers to fulfil their child safeguarding responsibilities, with the development of learning resources to provide appropriate training for mandated reporters to enhance their capacity for early identification and handling of suspected child abuse/neglect cases, as

⁸ Although the updated "Protecting Children from Maltreatment – Procedural Guide for Multi-disciplinary Co-operation (Revised in 2020)" by Social Welfare Department exhorts child-related organisations to establish an organisational policy to prevent child abuse in the institution⁶, there are no relevant guidelines on what reasonable steps a child-related organisation needs to take to safeguard children.

well as strengthening existing preventive and supportive measures. Yet with proof of genuine recognition of CSP implementation from child-related organisations, **Plan International suggests the Government consider offering both incentives and resources to facilitate child-related organisations at large to establish their Child Safeguarding Policy**, which would form a set of standardised guidelines for individual child-related workers to safeguard children from harm via the provision of:

- 9.1 **Financial resources for child-related organisations to recruit manpower and/or external consultants to assist in establishing and enforcing a set of Child Safeguarding Policy** to cope with the industry’s major difficulties i.e. lack of sufficient manpower and professional support in CSP implementations in their organisation;
- 9.2 **Provision of additional resources for all child-related organisations to acquire Child Safeguarding training for all staff and personnel who might have contact with children at work** to promote industry and public understanding of Child Safeguarding and the do-no-harm principle in the children-related context, including but not limited to the education and sports sector.

SECTION II: CHILDREN’S EYE CARE UNDER COVID-19

BACKGROUND OF THE ISSUE

10. There has been a continuous debate in Hong Kong on whether or not adequate eye examinations have been provided for children, where many argued coverage of primary eye care services for children are not comprehensive enough.⁹ The service scope of two free services provided by the government, namely the “Pre-School Vision Screening” and the “Health Programmes at Student Health Service Centre” are listed below:

Content of Test	Pre-School Vision Screening (For 4-5 years old) ¹⁰	Health Programmes at Student Health Service Centre (For P1-S6) ¹¹
Visual Acuity	Yes	Yes
Binocular Function	Yes	No
Estimation of Refractive Errors	Only for reduced vision	No
Examination of the Back of Eyes	Only for reduced Vision	No
Stereopsis	No	Only in P1
Colour Vision	No	Only in P6

⁹HK01 · 【基層醫療·二】學者籲先擴展學童驗眼 香港應否有全民眼檢？(Mar 2019) Retrieved from:

https://www.hk01.com/article/309939?utm_source=01articlecopy&utm_medium=referral

¹⁰ Family Health Service, Department of Health,2022. Retrieved from:

https://www.fhs.gov.hk/english/health_info/child/14812.html

¹¹ Department of Health,2022. Retrieved from:

https://www.studenthealth.gov.hk/tc_chi/resources/resources_forms/files/appendixb.pdf

Test for Disease of eye	No	No
Detailed Assessment of Refractive Errors	No	No

11. As from the above table, both programmes only offer a basic level of eye-sight checking where some eye diseases like Pseudo-myopia (假性近視) might be overlooked or treated inaccurately¹², while those illnesses might be prevented if proper medical treatments can be provided in the early stage.

THE IMPACT OF COVID-19: FINDINGS FROM PLAN INTERNATIONAL AND OTHER PARTIES

12. This debatable status was further intensified under the strike of the Covid-19 pandemic. First, the free student health services from the Department of Health had been suspended during these years due to the pandemic. Although the service gradually resumed in May 2022¹³, it indicated that children might miss the chance to go through important check-ups in the past 2 years where hidden diseases remained undiscovered.
13. In the child-led research supported by Plan International in 2022, 70 children in Kwai Tsing District were interviewed. 83% of the children reflected that their eye vision worsened due to the increasing usage of online learning tools. The children's representatives suggested the provision of comprehensive eye examination is necessary for all underserved children so that any early eye-related sickness can be identified.¹⁴ Some follow-up actions were then taken by Plan International:
- 13.1 Focus group interviews were then conducted with the social workers who serve the community as a follow-up. It is found that the situation is more severe than what has been reported. The centre has received a lot of help requests from parents and children regarding their worries about deteriorating eye-sight due to long hours of zoom classes, especially children from P.2- P.3. Children do not have adequate knowledge of visual health, and their vision can be worsened rapidly in 3 months due to the change of study mode. When children resume face-to-face lessons, it is found that they faced difficulties in studies, for instance copying writings on the blackboard, or even textbook reading.¹⁵
- 13.2 Also, many low-income families cannot afford to fulfil their children's needs and parents show a lack of awareness of the issue. Parents from underserved families

¹²SkyPost · (Apr 2019) 真近視定假近視?

<https://skypost.ulifestyle.com.hk/article/2327878/%E7%9C%9F%E8%BF%91%E8%A6%96%E5%AE%9A%E5%81%87%E8%BF%91%E8%A6%96%3F%20%E8%A6%96%E5%85%89%E5%B8%AB%20%E7%82%BA%E4%BD%A0%E6%8F%AD%E9%96%8B%E8%BF%91%E8%A6%96%E7%9C%9F%E9%9D%A2%E7%9B%AE!>

¹³ HKSAR, Press Release of "DH's eight Student Health Service Centres to resume provision of annual health assessment services starting next Tuesday", May 2022. Retrieved from: <https://www.info.gov.hk/gia/general/202205/05/P2022050400455.htm?fontSize=1>

¹⁴Plan International Hong Kong, Voices of Children Phase II Survey Report, 2022. Retrieved from: https://www.plan.org.hk/reports/Plan_Voice_of_the_Children2/index-h5.html#page=1

¹⁵HKSKH Lady Maclehorse Centre, 《眼部檢查支援計劃成功案例》, 2023

lack resources for proper knowledge of eye care and maintenance. Therefore, knowledge transfer of visual health is deemed vital to both parents and children.

- 13.3 A pilot project thus initiated by Plan International to support underserved children by appointing the PolyVision Eyecare Centre to conduct a comprehensive eye examination from Sept 2022 – Jan 2023 for around 123 children aged 4-14 .¹⁶ 60% of the inspected children were identified by the Optometrists with worsening eyesight with the need for new visual aids, whereas nearly 7% of children were diagnosed with vision complications e.g. high astigmatism.
14. The above survey, interview and pilot project are backed by a recent CUHK survey report released on Dec 2022 as it also shows parents and schools should pay more attention to vision complications among pupils. The questionnaire survey was conducted in June 2021 in 108 primary schools (P.) and 103 secondary schools (S.), and involved 6,498 P.3 (Grade 3) pupils, 4,249 P.6 (Grade 6) pupils, 6,228 S.3 (Grade 9) pupils, and their parents, as well as 736, 547 and 730 teachers who mainly taught P.3, P.6 and S.3 respectively. The results show that many pupils are affected by myopia: 28% in P.3, 50% in P.6 and 66% in S.3. Astigmatism was found in 47% of the S.3 pupils. A sizeable number of pupils who do not wear glasses reported vision complications, such as astigmatism, myopia and hyperopia. Over half of the parents reported that their children’s visual health deteriorated during the pandemic but few of them took any remedial action.¹⁷
15. On the other hand, CSSA recipients are now under a subsidy on eyewear-related service of HKD\$600 for 2 years per family¹⁸, which also indicated their incapability to purchase additional aids for their children. It shows that there are indeed strong needs, especially providing medical eye inspections for underserved children so that prevention/ early treatment can be delivered.

RECOMMENDATIONS FOR THE GOVERNMENT

16. With COVID-19 as an accelerated factor in worsening children’s vision, we have 3 recommendations for the government to consider in promoting one of the important areas in children’s physical health via
- 16.1 **Providing financial support for all children, aged 6-15, to go for a comprehensive eye examination** to fully investigate the substantial impact on children’s health from the 3-year Covid-19 pandemic;
- 16.2 The full check-up might include (but not limited to) review and examination on:
- Case History

¹⁶ Plan International Hong Kong has offered underserved children aged 6-14 who are inadequate housing residents with conditions of Comprehensive Social Security Assistance (CSSA) recipients, and/or Successful applicants under the School Textbook Assistance Scheme or as assessed by Registered Social Workers (RSW) as appropriate for joining the Eye Examination worth \$400HKD and \$500 subsidies for optical aids as dialogised necessary for replacements.

¹⁷ EdDataX Research Centre, The Chinese University of Hong Kong (Dec 2022). “Eye protection starts in childhood Responsibility Parents and Teachers Cannot Shirk”. Retrieved from: <http://eddatax.fed.cuhk.edu.hk/wp-content/uploads/2022/12/Press-conference-on-results-2022-12-19.pdf>

¹⁸ Comprehensive Social Security Assistance (CSSA) Scheme currently covers only one pair of glasses with \$600 for the family in form of subsidy in every 2 years. Source: [https://www.swd.gov.hk/storage/asset/section/250/en/CSSAG022021\(Eng\).pdf](https://www.swd.gov.hk/storage/asset/section/250/en/CSSAG022021(Eng).pdf)

- Vision & Refractive Status
- Binocular Vision
- Color Vision Screening
- Intra-ocular Pressure
- Ocular Health
- Fundus Photograph
- Diagnosis & Recommendation

where pupils who might suffer from the suspension of the Health Programmes at the Student Health Service Centre in the past 2 years can be fully examined, as well as evaluating the substantial impact on HK pupil's vision after consecutive years of online learning;

- 16.3 **Providing financial assistance for children with eye-sight problems, especially those from deprived families, with optical aid upon needs and professional recommendation.** As the current CSSA Scheme covers only one pair of glasses with \$600 for the family in form of subsidy in every 2 years, the underprivileged families would need additional support for new challenges imposed by the pandemic with new types of necessary expenses.
- 16.4 **Providing resources on public education to enhance parents, caretakers and teachers' awareness of eye care for children and the importance of regular optical check-ups for children aged 4-15.** As from the above resources, the public including parents, caretakers and teachers are not well-aware of the potential eye-related diseases for children under continuous hours of online activities during the Covid-19 pandemic. With financial resources for public awareness campaigns, including online and offline promotions and talks by professional optometrists, we hope to share the best practices for eye care to parents and children and raise awareness on the importance of regular optical checks for the earlier detection of any potential eye-related diseases.

APPENDIX 1: PLAN INTERNATIONAL'S SUGGESTED FRAMEWORK OF CHILD SAFEGUARDING POLICY

Policy

1. To commit to child safeguarding and state measures to be taken to guarantee children's safety.
2. To provide a clear code of conduct describing acceptable and unacceptable behaviours.
3. Policy is applied to all staff with acknowledgement by signing.
4. Policy is applied to all relevant persons (volunteers, associates, and partners) with acknowledgement by signing.

Procedures

5. To provide clear guidelines to employees, parents and children, so as to support them in reporting any suspicions of child abuse.
6. All incidents, allegations and complaints should be clearly recorded and stored.
7. To ensure children are well-protected during the investigation of a child abuse allegation.
8. To establish a clear time limit on case handling for child abuse allegation.
9. To establish a whistleblowing policy where employees should be able to report abuse or suspicions of abuse without fear of retribution and discrimination in the workplace.
10. To identify, manage and minimise potential risks to children in daily operation.
11. To respect and protect the privacy of children and seek the consent of the child before distributing the child's personal information or pictures.

People & Culture

12. To check job candidates' sexual conviction record.
13. To understand the candidates' attitude and ability towards child protection during recruitment (e.g. interview, background check).
14. To provide employees with regular training and support on how to maintain child safety.
15. To provide training to volunteers, partners and other persons who have contact with children to maintain child safety.
16. To assign child safeguarding responsibilities to designated staff in order to promote CSP's implementation within the organisation.
17. To cultivate a culture where workers feel that they can openly discuss issues related to harm to children.

Accountability

18. Keep the Child Safeguarding Policy public and accessible to all, especially children and parents.
19. To consult children and families on reviewing the effectiveness of child safeguarding policy & procedures.
20. To conduct regular reviews on existing child safeguarding policy and procedures every 1-2 years.