

**Response to the Public
Consultation of the 2024–2025
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 Government”)’s invitation for public view of the 2024-2025 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 2024-2025 budget.

These main recommendations include:

- **Budget for Preventing Institutional Child Abuse;**
- **Budget for Child Participation in the Community.**

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 Government.

Executive summary

This section serves to highlight Plan International's recommendations for the Government's preparation of the 2024-2025 budget.

A. *The need for resources for preventive measures against institutional child abuse*

Plan International welcomes the Hong Kong Government's effort on the Mandatory Reporting of Child Abuse Bill as a powerful initiative in encouraging child-related professionals to fulfil their child safeguarding responsibility and facilitating early intervention into suspected child abuse cases. Meanwhile, preventive measures are equally important in addressing institutional child abuse. The current state of child-related organisations in Hong Kong necessitates a systemic solution to address the deep-rooted issues. Implementing a comprehensive Child Safeguarding Policy is a crucial preventive measure of child abuse to ensure the safety of children. In order to ensure consistent levels of safety for children across different sectors and respond to the increasing demand for Child Safeguarding measures in these sectors, Plan International recommends that the government allocate resources to:

- a) Education Bureau for the development of a self-protection curriculum for kindergartens;
- b) Support Social Welfare Department in implementing preventing institutional child abuse in Child-related organisations;
- c) Hong Kong Police Force to expand the Sexual Conviction Record Check (SCRC) scheme eligible for checking to all staff and personnel who might have contact with children at work or in an institutional setting.

B. *Budget for child participation in the community*

The Home Affairs Department's Youth Participation Initiative, proposed in the Policy Address 2022, has established the "District Youth Community Building Committee" and "District Youth Development and Civic Education Committee". Plan International encourages the Government to further:

- a) Enhance this initiative to child participation and allocate fiscal support as "Special Children and Youth Development Fund" to the District Council for expanding and routinising the Youth Development in Tuen Mun to all districts.

Section I: Preventive Measures of Institutional Abuse in Child-related Organisations

Recommendations for the Government

1. Plan International suggests the Government consider offering resources to:
 - 1.1 Education Bureau to **develop a set of “Self-Protection” curriculum and workshops for kindergarten.**
 - 1.2 Social Welfare Department for **provision of implementing preventive measures of institutional child abuse in child-related organisations.**

Particulars

2. Plan International welcomes the Government’s legislation on mandatory reporting for suspected child abuse cases, and we believe that it is a powerful initiative in encouraging child-related professionals to fulfil their child safeguarding responsibility and facilitating early intervention into suspected child abuse cases which may cause serious consequences to children. The proposed support measures of the legislation, including formulation of the Mandated Reporter’s Guide and support training, reinforce the importance of providing necessary assistance. However, additional funding is needed for early preventive measures of child abuse.
3. In 2019-2021, Plan International Hong Kong conducted two Situation Analysis Studies on sports organisations¹ and the education sector², studies found that **1 in 5 (22.8%) 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’. Despite facing risks of harm in organisations, children have a low awareness of seeking help. **Nearly half (48.2%) of the children who encountered abuse had never told someone else about their experience.** More alarmingly, 1 in 10 children (11.2%) had been physically punished in educational institutions, even though corporal punishment has been legally banned in Hong Kong since 1991.
4. The Education Bureau (EDB) stated “raise awareness of health and safety, and develop self-protection abilities” as one of the learning objectives in the “Kindergarten Education

¹ Plan International. (2020). *Situation Analysis Study on Child Safeguarding Policy (Study with sports organisations in HKSAR)*. Retrieved from: https://csnet.plan.org.hk/wp-content/uploads/2020/07/Situation-Analysis-Study-on-Child-Safeguarding-Policy-sports-organisations_Research-Summary.pdf?_gl=1*zc330j*_ga*OTY1MjQ2OTUyLjE2OTYzODY1ODc.*_ga_BCG1RJJ83G*MTcwNTM5MTM0MC43MC4xLjE3MDUzOTEzNzEuMjkuMC4w

² Plan International. (2021). *Situation Analysis Study on Child Safeguarding Policy (Parents, Children, and the Education Sector)*. Retrieved from: https://www.plan.org.hk/wp-content/uploads/2021/09/CSP-Research_ES_EN_vf.pdf

Curriculum Guide”³. However, specific support and resources for implementing this objective in kindergartens are yet to be provided. The existing curriculum development and support offered by EDB primarily mainly cater to primary students, which inadvertently leaves kindergartens with limited provisions. In the Statistical Report published by the Social Welfare Department, it has been noted that **the age group of children between 3 to 5 years old comprises 142 reported cases of abuse, accounting for 10% of the total cases in 2022.**⁴ There is a pressing need for EDB to develop and establish a comprehensive "self-protection" curriculum specifically designed for children in the kindergarten stage, equipping them with crucial abilities to identify and effectively respond to potential risks, thereby promoting their safety and empowerment.

5. Plan International Hong Kong has launched a series of Child Safeguarding Policy capacity-building workshops for institutions, parents and children since 2020. PIHK had delivered over 234 training hours, reaching a total of 4,505 individuals. The “No Go Tell” Child Safeguarding Workshop and “Safeguarding Yourself” Children Workshop for Kindergarten K2-3 students aim to enhance their knowledge and awareness of self-protection, as well as appropriate responses to unpleasant events. **These workshops identified a discrepancy in the current kindergarten curriculum, specifically the absence of 'self-protection' education for students.** It has been recognised that there is a need to incorporate educational initiatives aimed at equipping children with the necessary knowledge and skills to protect themselves. Plan International encourages the allocation of funds to the Education Bureau for developing a “self-protection” curriculum targeting kindergarten.
6. The newly registered cases of child maltreatment had grown tremendously from 940 cases in 2020 to 1,439 cases in 2022. To implement systemic measures to prevent institutional child abuse, **there has been a global trend for child-related organisations to establish their own Child Safeguarding Policy (“CSP”) to minimise risks of harm and abuse to children within the institution according to prescribed national standards, particularly in Australia⁵ and England.⁶** Child Safeguarding Policy (CSP) is a set of clear standards and guidelines that minimise harm to children whom the organisation contacts, by governing the behaviour of staff and associates of the organisation, and embedding procedures to ensure concerns over children’s welfare are swiftly responded to. Plan International proposed fiscal support for child-related organisations to establish and enforce the 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

³ Education Bureau. (2017). *Kindergarten Education Curriculum Guide*. Retrieved from: https://www.edb.gov.hk/attachment/en/curriculum-development/major-level-of-edu/preprimary/ENG_KGECG_2017.pdf

⁴ Social Welfare Department. (2023). *Child Protection Registry Statistical Report 2022*. Retrieved from: https://www.swd.gov.hk/storage/asset/section/654/sc/Annual_CPR_Report_2022_bilingual_Final.pdf

⁵ 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>

⁶ 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

organisation, acquire Child Safeguarding training for all staff and personnel who might have contact with children at work.

Recommendations for the Government

7. Provision of funding for the **Hong Kong Police Force to expand the scope of the Sexual Conviction Record Check to all staff and personnel who might have contact with children at work or in institutional settings eligible for checking** to safeguard children from potential risks of abuse.

Particulars

8. Sexual Conviction Record Check (SCRC) is an administrative scheme that enables employers of persons undertaking child-related work and work relating to mentally incapacitated persons (MIPs) to check whether eligible applicants have any sexual offences conviction records. SCRC is voluntary and only applicable to eligible applicants undertaking child or MIP-related work in an organisation or enterprise, however, private tutors and volunteers are not included.
9. Recent news has shed light on the alarming issue of institutional child abuse prevalent across various child-related sectors in Hong Kong. This grave problem necessitates immediate attention and decisive actions from the Government.
 - 9.1 In one distressing case, an indecent assault was perpetrated by a volunteer tutor at a community centre. It was revealed that the sex offender had a prior conviction for child molestation.⁷ Shockingly, even after his release from prison, he persisted in seeking opportunities to interact with children and committed further crimes. In two separate cases, secondary school teachers were accused of engaging in alleged indecent assault and sexual harassment against female students. These teachers were accused of inappropriate physical contact with the students, and one of them had previously been involved in a similar incident at the previous school.⁸ These incidents underscore the urgent need for comprehensive measures toward institutional child abuse, ensuring the safety and well-being of children across all sectors.

⁷ 星島頭條. (2023). 變童癖非禮積犯出獄後再犯案 35 歲義補導師判囚 2 年 官冀擴展性罪行查冊範圍至義務工作. Retrieved from:

<https://www.stheadline.com/society/3288690/%E5%AD%8C%E7%AB%A5%E7%99%96%E9%9D%9E%E7%A6%AE%E7%A9%8D%E7%8A%AF%E5%87%BA%E7%8D%84%E5%BE%8C%E5%86%8D%E7%8A%AF%E6%A1%88-35%E6%AD%B2%E7%BE%A9%E8%A3%9C%E5%B0%8E%E5%B8%AB%E5%88%A4%E5%9B%9A2%E5%B9%B4-%E5%AE%98%E5%86%80%E6%93%B4%E5%B1%95%E6%80%A7%E7%BD%AA%E8%A1%8C%E6%9F%A5%E5%86%8A%E7%AF%84%E5%9C%8D%E8%87%B3%E7%BE%A9%E5%8B%99%E5%B7%A5%E4%BD%9C>

⁸ HK01. (2023). 天水圍區中學 43 歲男教師被捕 涉帶團內地交流期間非禮女學生. Retrieved from:

https://www.hk01.com/article/959324?utm_source=01articlecopy&utm_medium=referral

- 9.2 These cases also exposed the loopholes in the recruitment and screening process of staff and volunteers in the organisation. According to a study, **57.5% of child sex offenders would choose to work in child-related organisations in order to increase their exposure to children.**⁹ At present, **the required SCRC only applies to the employment relationship but not volunteers, thus making it possible for sex offenders to take advantage of the situation.**
10. The Situation Analysis Studies mentioned earlier also found that **27% of interviewees from the sports sector did not conduct the SCRC** during the recruitment process, reflecting sports organisations generally share little knowledge or experience of institutional child abuse. **For the education sector, there is still 8.7% of the interviewed organisations responded “no” or “uncertain” if staff will undergo SCRC** before or during the commencement of their duties.
11. Currently, SCRC is still implemented as a voluntary administrative scheme with limited coverage of child-related roles. Plan International adjures the Government to consider offering funding to extend the SCRC scope to all staff and personnel who might have contact with children at work to ensure better compliance. This could facilitate and encourage child-related institutions to conduct a more thorough vetting of all relevant workers to better safeguard children in the organisation.

⁹ Joe Sullivan, Anthony Beech (2004). *Child Abuse Review, and BASPCAN.*

Section II: Further Promote Children and Youth Participation in the Community

Recommendations for the Government

12. Plan International suggests the Government **allocate financial provisions as “Special Children and Youth Development Fund” to the District Council for expanding and routinising the “Promotion of Youth Development in Tuen Mun” as a reference to all 18 districts**; This expansion would require an estimated annual budget of \$4.8 million aiming to nurture children and youth community engagement and reaching out. This initiative can foster comprehensive and sustained support for youth and children's development, empowering young individuals and promoting a sense of belonging to the community.

Particulars

13. Plan International greatly welcomes the establishment of the “District Youth Community Building Committee” and “District Youth Development and Civic Education Committee”, as part of the Government’s Youth Participation Initiative proposed in the 2022 Policy Address. In the 2023-24 Budget, the Government allocated a substantial amount of 1,005.3 million to “Youth Development, Social Harmony, and Civic Education”¹⁰, with one objective to formulate the Youth Development Blueprint and monitor the implementation progress of initiatives. These committees serve as important platforms for discussion on district affairs, with an inclusion of young people aged between 16 and 35, who comprise over one-third of the committee members. With the commencement of the new term of the District Council on 1st January 2024, both committees have opened up opportunities for more young people to actively participate in community building and engage in matters pertaining to the district.
14. The “District Youth Community Building Committee” acts as a conduit for conveying the perspectives and opinions of local residents, particularly young individuals, regarding district works, facilities, and other community building projects specified by the District Office. The “District Youth Development and Civic Education Committee” aims to raise awareness and promote activities related to youth development and civic education within the district.
15. While we appreciate the Government’s effort in gathering and amplifying young people’s voices, we do witness that there are necessary steps and groundwork to be done in order to develop youth and children under the age of 16 in possessing the capacity to engage in meaningful discussions concerning community-related matter within the district. Taking

¹⁰ Budget 2023-24. (2023). *Head 53 – Government Secretariat: Home and Youth Affairs Bureau*. Retrieved from: <https://www.budget.gov.hk/2023/eng/pdf/head053.pdf>

Plan International’s “Voice of the Children” project as a concrete example, children aged 12 or below proposed the following findings after 1-year engagement in capacity building and community explorations under Plan HK’s programme model of Children Participation in Community Development:

- 15.1 **The 10 Indicators for Creating Child-friendly Recreational Facilities in Kwai Chung** (Appendix 2)
 - 15.2 **Insufficient resting area for domestic workers; air pollution along King's Road; retention of district characteristic of North Point**
16. Plan International has been actively working internationally and locally on including children’s voices in community development. A child’s right to participation is one of the basic rights enshrined in the United Nations Convention on the Rights of the Child (UNCRC). Article 12 of the UNCRC establishes the right of every child, under the age of 18, to freely express her or his views in all matters affecting her or him, and the subsequent right for those views to be given due weight, in accordance with the child’s age and maturity.
- The “Voice of the Children” project mentioned above, is a community-based child participatory project Plan International Hong Kong launched in 2018. This project has provided valuable insights into the issues observed by children within their community. As an organisation dedicated to championing children’s rights, including their right to participate in decision-making processes, it is our responsibility to amplify the voices of local children regarding the challenges they encounter and the solutions they seek. Project Phase 3, partnered with the HKSKH Lady Macle hose Centre and Hong Kong Christian Service respectively in Kwai Chung and North Point, aims to motivate children to participate in social development by exploring community issues around them through a series of workshops and site visits. The “Voice of the Children” demonstrates a child-centred model of community development – **from raising awareness of children’s rights to identifying problems and building consensus with peers and other stakeholders, advocating for the government and those involved to take responsibility for bringing about positive change in the community.**
17. PIHK observed great potential through the “Voice of the Children” project. Children’s unique perspectives and innovative ideas contribute fresh insights to community projects and initiatives. Plan International recommends that the Government allocate funds for a pilot scheme, targeting children under the age of 16, with the objective of capacity building and community development. This strategic investment would support and empower children, equipping them with the necessary skills and knowledge to actively participate in community affairs during their youth transition. By providing children with opportunities for engagement and fostering their sense of agency, they can actively contribute to shaping their communities, thus fostering a future that is both inclusive and sustainable.
18. Tuen Mun District Council proposed the “Non-works components relating to Promotion of Youth Development in Tuen Mun” in 2016, of \$28.3 million for delivering a youth development project in TM through partnering with a non-profit-making organisation under

the Signature Project Scheme (SPS).¹¹ This 6-year project is dedicated to enhancing grassroots youth, aged 15 to 29, their horizons, career aspirations, and work skills, and having a visible and lasting impact on the community. A total of \$3.5 million was allocated for Item (B), Extending the Project's impact to the community, with (I) Community engagement and reaching out (\$1.6 million) and (II) Project evaluation and social impact assessment (\$1.9 million). The scheme has provided service to 76,757 individuals from primary students to youth residing or studying in TM.¹²

19. Echoing the Youth Participation Initiative, Plan International expresses the hope that the **Government will consider expanding this youth development scheme to encompass the development of all children under 18 in the community** as well. In this regard, it is **recommended that the relevant committees actively involve child participation and prioritise issues that directly impact children with the District Office and related government bodies**, including education, community services, and recreational facilities. We also recommend Committees establish consultative channels in communities for children to participate meaningfully in matters relating to them in their community surroundings, collecting children's views at large. The successful engagement of the Leisure and Cultural Services Department (LCSD) in community participation and the transformation of Public Play Spaces¹³ serves as an exemplary reference, having achieved positive outcomes in child participation.

¹¹ Legislative Council, HKSAR. (2016). *New Item "Signature Project Scheme (Tuen Mun District) – Promotion of Youth Development in Tuen Mun"*. Retrieved from: <https://www.legco.gov.hk/yr15-16/english/fc/fc/papers/f16-41e.pdf>

¹² Youth Space. (2024). Retrieved from: <https://youthspace.yot.org.hk/>

¹³ Leisure and Cultural Services Department. (April 2023). *Transformation of Public Play Spaces Community Engagement*. Retrieved from: <https://www.lcsd.gov.hk/en/pps/engagement.html>

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.

Appendix 2: 10 Indicators for Creating Child-Friendly Recreational Facilities in Kwai Chung (Chinese Only)

「葵涌十大兒童社區康樂設施指標」

衛生環境

1. 公園洗手間需要增加清潔的頻率，以保持整潔和衛生。
2. 政府應增加聘用清潔工，以保持區內公園的整潔和衛生。

安全設施

3. 在每個公園及附近的街道裝設足夠的街燈，可以讓夜間遊玩的市民感到更加安全舒適。
4. 近年夏天雨勢越趨嚴重，政府應在明年夏季前，為區內公園增加足夠排水系統，避免因雨水積聚而導致的損壞和危險。

康樂空間

5. 區內應該增加更多刺激性更強的遊樂設施，如繩網、高空滑梯等，以吸引更多的適齡兒童使用。
6. 區內公園應該開放大型草坪等位置（如多用途草地），增加區內居民可以使用的機會。
7. 區內足球場及籃球場應每季度進行翻修，減少球場油漆脫色問題，確保龍門及球架妥善安裝。

用家體驗

8. 在政府所有公園都應該提供免費 WIFI 服務，並設立清晰的指示，方便市民使用無線網路。
9. 在公園內應該增加更多面向遊樂場的涼亭和有蓋長凳，以提供足夠遮陽避暑的場所給照顧者。
10. 政府亦應於明年夏日襲港前，為全葵涌不論大小的公園添置最少一部自動飲水機。