



CHILD PROTECTION POLICY

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Wellspring Learning Community

Child Protection Policy

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Related Policies:

Admissions Policy

Health and Safety Procedures

Student Handbook


Staff Handbook

Recruitment Process


Code of Conduct (to be developed)

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on behalf of the
Governing board
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Oct. 17, 2022

Head of School


17 October 2022

Wellspring Learning Community

Child Protection Policy

This policy was established and adopted in June 2017 by Wellspring Learning Community (WLC) leadership team in partnership with **himaya** and will be reviewed on a biannual basis, unless there is a need for an immediate change in policy. It has been reviewed in 2021 and 2022. The proposed date for the next review of this policy document is June 2024. Through this partnership, **himaya** promises to support WLC in all cases of violation detected, services required and implementation procedures for this CPP.

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Acronyms:

WLC – Wellspring Learning Community

CPP – Child Protection Policy

SOP – Standard Operating Procedures for the protection of juveniles in Lebanon

DCPO – Designated Child Protection Officer

CPG – Child Protection Group

CRC – [UN] Convention on the Rights of the Child

MoSA – Ministry of Social Affairs

HOS – Head of School

LCO – Legal Compliance Officer

Definitions:

Child

For the purpose of this document, a “child” is defined as anyone under the age of 18, in line with the **UN Convention on the Rights of the Child and Lebanese Law 422**, or older in case they are still students at WLC.

Child Protection

Organized efforts to protect children from violence, abuse, neglect and exploitation.

Child Abuse and Neglect

Refers to all forms of physical and emotional ill treatment, sexual abuse, neglect, and exploitation that results in actual or potential harm to the child’s health, development or dignity.

Child Physical Abuse

Non-accidental physical injury to the child often resulting in physical impairment of the child. Examples include striking, kicking, burning, shaking or biting the child.

Child Sexual Abuse

Sexual abuse refers to **any form of sexual activity** or act with a child by an adult or by another child who is in a position of responsibility, trust, or authority over the child.

Child Psychological Abuse

A pattern of aggressive and negative interaction with a child, which includes attitudes, behaviors, or hostile speech, and can seriously interfere with a child's cognitive, emotional, psychological or social development.

Child Neglect

The ongoing failure– to meet the child basic needs (food, clothing, shelter, medical care, education, emotional support and supervision) to the degree that the child's health, safety, and wellbeing are threatened with harm.

Suspicion of child abuse

Any event or occurrence that leads to any doubt of an abusive situation. Suspicions do not need to be verified by the reporter nor justified by proof before they are reported; doubt is sufficient to inform an authority.

Bullying

The recurrent use of intimidation or coercion unto a peer. This behavior is characterized by the existence of a power imbalance, hostile intent and recurrent behavior.

Imminent Risk

All forms of abuse, threats or other circumstances endangering the safety and development of a child that require immediate judicial measures to prevent serious harm. These cases are the responsibility of the Ministry of Justice (Standard Operating Procedures for the protection of juveniles in Lebanon– SOP).

Potential Risk

Threats that can affect the development and safety of a child but do not require immediate judicial measures. These cases are the responsibility of the Ministry of Social Affairs and partner child protection organizations. (Standard Operating Procedures for the protection of juveniles in Lebanon– SOP).

1. Policy Statement

This Child Protection Policy (CPP) aims to create a child safe environment where children are respected, empowered and involved in their own protection, and where staff are confident, competent and well supported in meeting protection-related responsibilities.

2. Policy Scope

All students registered at WLC schools are covered by the procedures in the CPP both on and off school grounds. “School grounds” include all relevant geographic school campuses (land, buildings, classrooms, courtyards...), school transportation services (buses, vehicles), and any ground utilized for school services or events including overseas school trips. Any violence inflicted off school grounds that is detected on school grounds will be acted upon according to the outlined procedures to safeguard the wellbeing of the student.

3. Introduction

This policy is in line with a child rights-based approach under the **UN Convention on the Rights of the Child (CRC)** signed and ratified by Lebanon on May 14, 1991. This approach recognizes, without discrimination, that each child is a unique human being deserving of rights, and capable of participating in the process of achieving those rights given a supportive and adequately resourced environment.

This policy has been developed by Himaya and WLC in accordance with the Lebanese law **422/2002** ‘*The Protection of Juveniles in Conflict with the Law and/or At Risk*’, specifically articles 25, 26 and 27, and the **National Standard Operating procedures for the protection of juveniles in Lebanon (SOP)** adopted by the Ministry of Social Affairs.

Himaya is a Lebanese non-governmental organization founded in 2009 and dedicated to protecting children from all forms of abuse. It operates across the Lebanese territory and offers

services that cover a large spectrum of intervention: prevention, psychosocial follow-up, raising awareness about child abuse, advocacy, capacity building, research and development.

The policy is also guided by **focus group discussions** with staff and students, as well as **surveys** from parent/guardian(s) within WLC, for the creation of a document representative of community members' needs and priorities.¹

4. Purpose of the policy

This document will provide a rationale for a child protection policy and will describe standards and procedures that ensure:

- All students are protected from all forms of violence and abuse
- Regulations, procedures and structures are in place to facilitate the adoption of safe practices within WLC (i.e. the CPG, DCPO and recruitment checks)
- Reporting procedures related to detection and referral of abuse and violence are clear and protect confidentiality
- All community members (staff, administration, teachers, governing authorities, volunteers, visitors) are comprehensively aware of their conduct and the school's legal responsibilities on all matters related to student protection and the promotion of their wellbeing

Essentially, this document is a pledge from all the WLC community members to reject abuse and violence against children in all its forms, and to implement guidelines and procedures within this policy.

a) A shared responsibility

Protecting children from harm is the collective responsibility of all community members including students, parents, teachers as well as community agencies and community professionals. The community can ensure the implementation of this policy and promote a safer environment via activities and programs implemented throughout the academic year. Ultimately, involving children

¹ In 2015, WLC parent/guardian(s) were asked to complete surveys, concerning knowledge and opinions on child protection, as part of preliminary research for the development of this policy.

in their own protection and encouraging cooperation among community members will encourage the development of essential life skills associated with the reduced likelihood of child abuse and neglect.

b) Child Protection Issues

Child protection activities target a range of potential issues that can affect the physical and mental health of students. The main four types of child abuse, as per the definition used above, are **physical, psychological, sexual abuse and neglect**. Possible forms of violence may include, but are not limited to: **bullying** (cyber bullying, peer to peer bullying, racist and homophobic abuse), exposure to domestic violence, exposure to inappropriate sexual content and exploitation.

Any harm directed towards children can result in an array of negative consequences including a decrease in self-esteem, health problems (including mental health) and poorer grades. When a student is facing harm, they may develop persistent feelings of insecurity, fear, and disrespect that can affect their learning and development. To adequately protect children, any harm occurring within school and outside of school will be covered by the policy.

There is a distinction between corporal punishment and physical abuse by law however, they both have negative consequences on children. Abuse is typically distinguished through the frequency or violence, severity of violence, the age of the child and other factors contributing to their vulnerabilities (Appendix 2).

5. Ethos

WLC's mission and guiding principles call for a safe collaborative community that maintains positive learning environments that responds to the needs of its community members, while aiming for the holistic development of students (cognitive, social, emotional, physical, ethical...)

Such an environment includes safe physical structures, school transportation services, healthy nutrition and respectful values; all of which require support to ensure their sustainability. As such, WLC promises to periodically monitor and improve necessary all: physical environments

(electricity, building structures, hygiene...), transportation services and driver assessments, as well as food services for balance, nutrition and food safety practice.

WLC encourages effective communication using a horizontal platform, meaning such communication is not influenced by any hierarchical structure or authoritative power status. In this way, children can feel comfortable discussing issues of child protection and their wellbeing, which in turn supports a comfortable appropriate environment for children. Working with transparency can help break the silence, taboos, stigma and fear linked to violations of harm to children. Through transparency, a preventive environment can be created to support child protection. School procedures will be made public presenting the willingness to acknowledge violations, correct them and hold perpetrators accountable whenever necessary.

WLC fully recognizes the contribution a school can make to ensure children feel safe and appropriate action is taken whenever there is a violation of their rights. WLC is adhering to Ministry of Social Affairs (MoSA) recommendations to develop a policy that protects children and promotes their wellbeing. Such a policy can help clarify expected behavior, unacceptable behavior, and legal obligations and encourage practices that would allow children to feel safe. To create such an effective policy, WLC has established a partnership with himaya to organize all aspects in the development adoption and implementation of this policy. When effective, a Child Protection Policy primarily creates a child-friendly environment. Within this environment is a system to help detect and manage all claims of abuse, while preventing further violations of children's rights.

6. CPP Structure and Responsibilities

a) Child Protection Group (CPG)

The child protection group (CPG) stands to monitor effective implementation of the policy throughout the school, and promote a safer school environment via activities throughout the academic year.

To ensure all community members are represented, the CPG is made up of the following:

The wellbeing coordinator, DCPO(s), student counselors, a parent representative, a teacher representative and a student representative (president of the student council).

The CPG responsibilities are as follows:

- **Assist** in the review of the policy in accordance with the review cycle
- Reach majority consensus on the assigning of the DCPO yearly
- Ensure that there is an active DCPO throughout the academic year and nominating a replacement when needed
- Ensure that parents and students are aware of the policy
- Oversee the completion of the required training by all staff and CPG members annually
- **Ensure the implementation of the procedures within the policy by the concerned staff members**
- Ensure that all terms of the CPP, within WLC's jurisdiction, are respected and implemented (school campuses, facilities, buses, school events and field trips organized by the school)
- Identify concerns or factors negatively affecting the wellbeing of students in WLC including matters related to health and safety (e.g premises, facilities, food served at the cafeteria...)
- Introduce activities throughout the academic year that promote the CPP or promoting a theme relating to child development or child protection
- Communicate community members' training needs to Himaya or other relative organizations for action

The recommended frequency of CPG meetings is **once** per month at which minutes of meeting should be taken and shared with the members of the CPG.

b) Designated Child Protection officer (DCPO)

The designated child protection officer (DCPO) is the assigned officer responsible for receiving all witnessed or suspected cases of harm against a child within WLC, (excluding cases of misconduct – detailed later). Handling of cases or reporting will depend on who the allegation of child abuse is against, also to be detailed later. The CPG committee will short-list nominees for the position of DCPO, where a majority should approve the selection.

WLC has assigned a DCPO for Mathaf campus and a DCPO for city center campus.

The DCPO’s responsibilities are as follows:

It is preferred that the DCPO be the school counselor or social worker, however it is not necessary. When the DCPO is not the school counselor or social worker, coordination between the parties is highly recommended. What is most important is that all incidents and records remain confidential and that the privacy of students is respected at all times (Appendix 5 identifies recruitment requirements and preferred characteristics for the DCPO.)

The DCPO is required to understand and follow WLC’s internal referral pathway (Appendix 1), and take the necessary reporting and informing procedures in accordance with the Standard Operational Procedures (SOP) under the law 422/2002 and legal referral pathway (provided in the DCPO toolkit appendix 8).

The DCPO is required to fill in a “reporting form” (DCPO toolkit, Appendix 9) for a reported case that shows a child is facing potential risk or imminent risk. The forms will be kept as records for all reported cases of violation against children within WLC. Soft copies should be password encrypted when they are sent to child protection organization (DCPO toolkit Appendix 10). Any hard copies and written information should remain secure in a locked locker or cabinet at all times in a room with limited access to guarantee confidentiality (DCPO toolkit Appendix 10). They will be used whenever external organizations need to be sought out for help managing a case, and for monitoring and evaluation purposes.

Cases of abuse allegations outside the school premises are handled by the DCPO. However, cases of abuse allegations against WLC staff are reported to the DCPO, who in turn immediately hands

it over to the LCO and the HOS. The DCPO can be part of the investigative committee but does not directly handle the case.

In cases of bullying within the school premises, the DCPO is not directly reported to and does not take disciplinary measures, however the DCPO should be informed by the HOS on cases of bullying. Cyber bullying however falls under child abuse, and such cases will be handled by the DCPO.

Cases of misconduct, such as fighting between children and school premise bullying, are not handled by the DCPO, but rather by the school supervisor and the HOS, and disciplinary measures are taken in accordance with the student handbook and disciplinary procedures. The DCPO should be informed on cases of misconduct.

c) Legal Compliance Officer (LCO)

The legal compliance officer is contacted by the DCPO upon any allegation of child abuse against a member of WLC staff. The LCO will coordinate closely with the HOS on the case. The LCO is a vital member of the investigative committee that handles cases of staff allegations. The LCO is also the person in charge of implementing disciplinary procedures with staff, if the need calls for that (see appendix 14).

d) Head of School (HOS)

The HOS handles cases of student misconduct, including bullying, and needs to share major cases with the DCPO.

When it comes to cases of child abuse, the HOS will be informed by and at times collaborate with the DCPO on proper responses. The HOS will follow-up on case management whenever a child is deemed to be in immediate danger and requires referral, and collaboration with child protective organizations (e.g. UPEL or himaya), and/or reporting and informing the relevant authorities. The HOS also collaborates with and takes joint decisions with the LCO concerning breaches to the CPP by any member of the WLC community, and leads discussions for appropriate response as per the

disciplinary procedure within this policy (see appendix 14)

When necessary the HOS will be the person to notify the parents of a child, along with the DCPO.

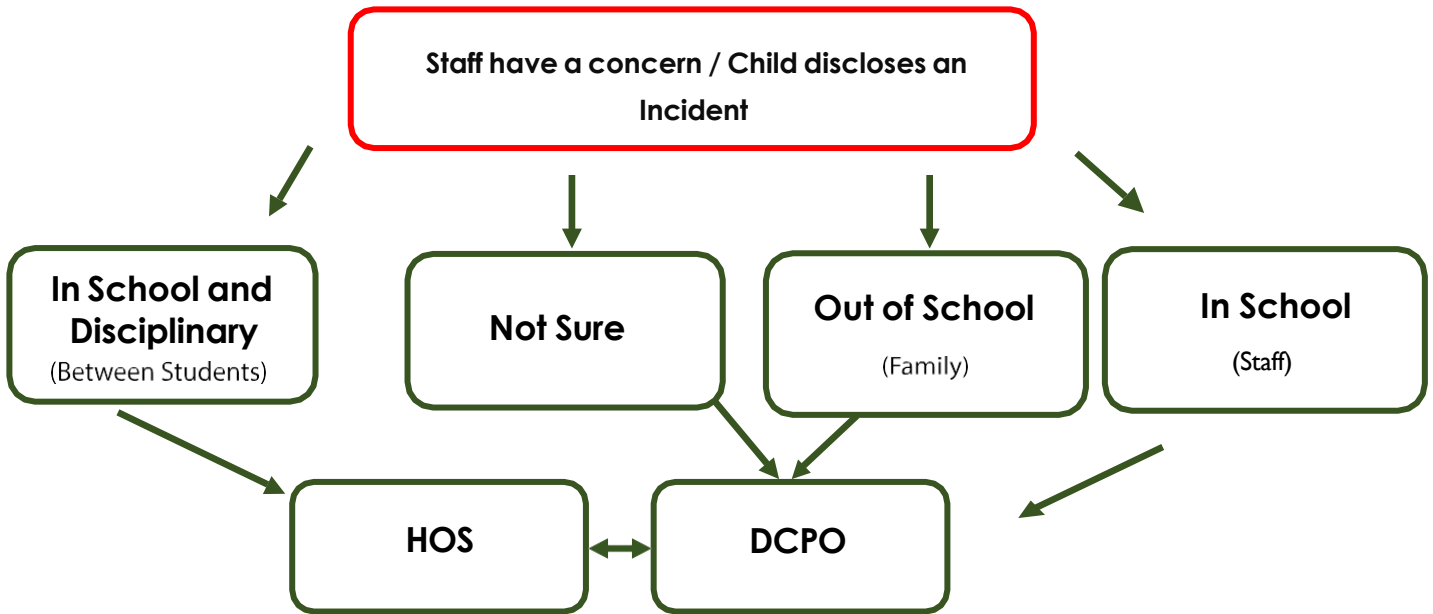
e) Staff

All staff are required to attend himaya's training that covers the following themes: types of abuse, detection and referral, introduction to the CPP and the CPP procedures. As such, WLC staff will be sensitized to the reality of violations of children's rights, the consequences of these violations, Lebanese law for child protection, legal obligations and expected roles of educators and staff in detecting cases, components of the adopted CPP and how to effectively implement it, the DCPO responsibilities and the referral pathways to be used within WLC.

Staff responsibilities are as follows:

- Read, understand and sign agreement to the CPP, keeping a copy of it for their personal reference. It is encouraged that while reviewing the CPP, staff members bring forward their concerns and questions to the DCPO
- Respect and apply the CPP and contribute to the promotion of a safe environment to improve outcomes for all children
- Request support from potential partners through the established CPG for technical support and empowerment for themselves and students. Possible responses may be training sessions, school wide activities or talks from professionals
- Report all witnessed and/or suspected cases of harm against a child that occurred to a WLC student within or outside school grounds. Reporting a case should follow the below guidelines and the "disclosure of abuse - referral map".

Disclosure of abuse - referral map:



If the staff member feels that the child is at imminent risk, then they must immediately report this to the DCPO within 24 hours, otherwise, the staff member will need to report the incident within 3 days.

Recall that imminent risk is when the child’s wellbeing is at risk and requires immediate intervention e.g. a disclosure of sexual abuse.

When the issue is that of student misconduct, within the school, and requires disciplinary measure as per the school student handbook, staff need to inform the supervisor and/or the HOS. It will then be the responsibility of the HOS to share info with the DCPO on this incident e.g. if there is a case of bullying in the school between two enrolled students.

When the issue does not fall under student misconduct (eg. fighting or bullying between students), and doesn't require disciplinary measures then the issue should be directly reported to the DCPO.

If the issue is related to the family of the child or has occurred outside of the school grounds, this should be directly reported to the DCPO and should not be further discussed with other staff members to preserve confidentiality.

If the issue is related to cyberbullying, then it should be directly reported to the DCPO.

If the issue is related to staff, then it should be directly reported to the DCPO.

If a staff member who suspects child abuse is uncertain of the correct response, then they should approach the DCPO directly in order to preserve confidentiality. The DCPO will then determine the correct response/course of action or the relaying of information and case to the HOS or to the LCO, depending on the case as per this policy (detailed later on)

When an incident or suspicion is reported by staff, the situation will then be assessed by the DCPO, in coordination with the HOS, when needed, to determine the response or course of action.

Cases of allegation against staff are to be reported to the DCPO, who in turn will refer the matter to the HOS and LCO.

The severity of any incident will be determined by the DCPO using the classification of risk described in Appendix 2. The best response will depend on the classification of the risk and can be discussed with a child protection organization, depending on its severity.

When an allegation or disclosure of harm is made by a child:

- Find a quiet, private place to talk to the child
- Stay calm and listen carefully
- Reassure the child that he/she has done right by speaking up
- Reinforce the notion that the child has the right to be safe
- Avoid investigative and leading questions

- Inform the child that the case will be referred to the DCPO
- Do not promise the child secrecy concerning the case he/she has shared, but to ensure his/her privacy and confidentiality will be respected as the case will be only discussed with the DCPO and whoever is legally to know
- Make the referral to the DCPO following the referral pathway (Appendix 1)

Community members receiving a report should **not**:

- Express shock or disbelief
- Attempt to determine if the allegation is valid or invalid
- Pressure a child to disclose
- Call the child's parents
- Promise to keep the reported incident a secret
- Lecture the child or blame them in any way
- Convey anger or impatience if the child is not ready to discuss the incident

After a report is made, staff members that report a case either by observing signs/symptoms or receiving a disclosure from a child **should not discuss the case any further**. A reporter may only obtain information from the DCPO on whether the case was followed up on.

When a teacher is in further contact with a child that has disclosed sensitive information to them, they should attempt to normalize the classroom's environment. Ideally the staff members should:

- Act normally with the child in the classroom
- Avoid mentioning sensitive details in anyway in front of the class
- Develop the child's belonging in the class and ensure their inclusion as much as possible
- Preserve the confidentiality of the child
- Positive reinforcement by supporting positive behaviors and highlighting the strengths of the child
- Listen to the child if they wish to discuss their feelings or the incident
- Report to the DCPO if there is no improvement with the child or if the child seems distressed in any way

f) Nurse

The school nurse is in the position to identify signs and symptoms of abuse, as the nurse interacts with children in a private area and may examine them if and when needed. Therefore, the nurse may be in a position where he/she may notice clinical, physical or psychological indicators of abuse. The nurse will be provided with more information and general guidelines on suspicious bruising and signs by the DCPO (DCPO Appendix 11).

The nurse:

- Is expected to preserve the privacy of any child during examination and to protect confidentiality of any information provided and to only reveal any sensitive information if it either indicates or confirms child abuse to the DCPO.
- Should consult with the DCPO when:
 - there are suspicious signs on the child.
 - he/she receives a disclosure from the child
- Should abide to the “disclosure of abuse-referral map” referral pathway (displayed above).

g) HR

In line with staff roles and responsibilities, Human Resources (HR department) is expected to ensure the required recruitment checks (Appendix 3) are carried out. This primarily includes ensuring that staff members are free of previous child-related offences. HR is also expected to mention the CPP when possible in future job posts, to ask prospective candidates to review the CPP before an interview and to address the CPP during the interview. The HR department will also ask new staff members and any volunteers, interns or shadow teachers to sign the **declaration of commitment to WLC’s CPP**, which was developed in partnership with himaya.

h) WLC Community

We recognize that families are the foundation of a healthy child and acknowledge that they can face challenges common to all. Accordingly, parent/guardian(s) will be invited to attend awareness sessions as an initiative to support and engage families and the entire community in promoting child protection and ensure their comprehension of the CPP. These sessions are developed based on the information from surveys conducted with WLC parent/guardian(s) in 2015 that expressed a 75%* interest in attending workshops that cover: improving communication with their child, recognizing signs of abuse, ways of reacting in possible situations with children, dealing with difficult children and how to talk to children who are suspected to be facing abuse. Additionally, the CPG and the school counselor will be accessible to discuss all concerns regarding the wellbeing of children and families, with possibilities of exploring solutions and referral to professionals.

Volunteers, and/or visitors, including volunteer parents, will be briefed on their roles and responsibilities as per the Child Protection Policy (CPP). Any individuals with prolonged contact with children must be briefed on the CPP while short-term visitors or guest speakers should be accompanied by trained staff to ensure the policy is not breached. Advisable protection procedures to be taken with volunteers and visitors are in Appendix 4.

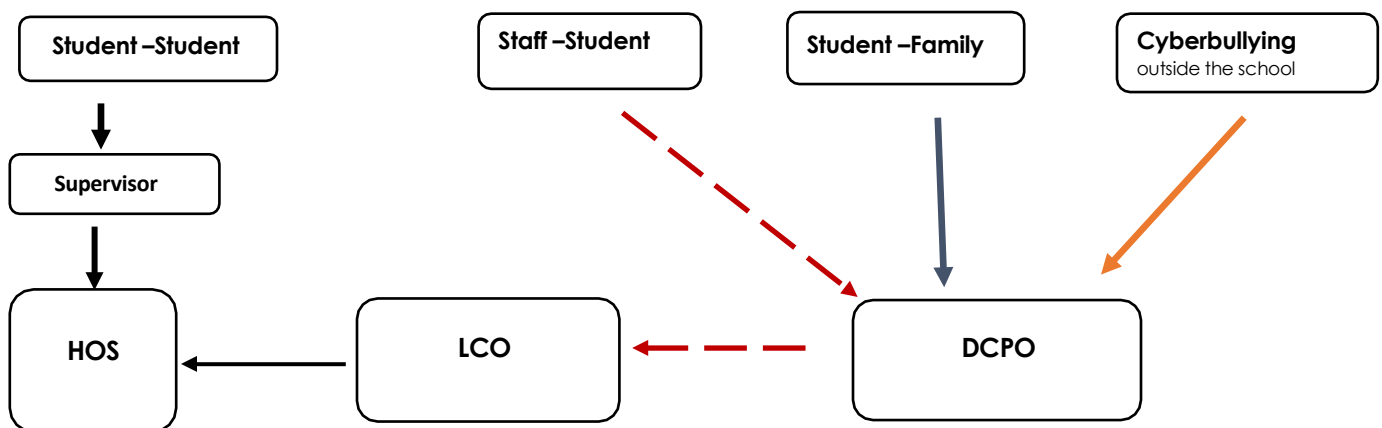
WLC's role in child protection and the good practices and procedures of the CPP are made public (on the school website) and circulated. In this way, parents/guardians and any community users organizing activities for the children are aware of the CPP, and understand the importance of compliance.

It is the responsibility of the whole school (staff, parent/guardian(s), volunteers, visitors and students) to know:

- How to respond to a suspicion or witness of harm to a child
- The procedure followed to share such concerns or disclose of the abuse to the DCPO

7. Managing Allegations

The reception of any allegation must always be taken seriously and investigated before any actions or decisions are taken. There are no legal or organizational ramifications for allegations investigated and identified as “false”, rather, it is the ethical duty for all those that observe or doubt a case of abuse to report it to the DCPO. In this section, the pathway for possible responses to the detection of abuse, differentiated by the different source of harm, will be outlined.



a) Student-Student

WLC students receive a student handbook that clarifies the school’s protocols and procedures and all acceptable practices expected from students. The student handbook also outlines the disciplinary consequences and procedures that WLC may enact.

As per the student handbook, when incidents of student misconduct occur within the school grounds, they will be reported to the supervisor, who will then report to the HOS.

Bullying at school can compromise the wellbeing of a child and negatively affect their development therefore it will be taken with utmost seriousness. The long- term effects of bullying can be extremely harmful therefore early detection and supporting all those involved is essential. Bullying, be it physical or psychological, falls under student misconduct and should be reported to the HOS who shall then determine the consequences as per the student handbook with possible responses:

- A formal warning is issued through the WLC administration
- A meeting to be held with the students, parent/guardian(s), the HOS and the supervisor and/or Principal when possible
- Relevant ramification as per the school handbook: Detention, Suspension or Expulsion

It is the responsibility of the HOS, to relay cases of bullying to the DCPO who must keep note at this point and provide the necessary support.

Cyberbullying outside the school however is to be reported directly to the DCPO. Situations where a child is at imminent risk of cyberbullying **ALWAYS** require reporting. In this case, the DCPO must be informed within 24 hours, or by the end of the school day, and must consult with a child protection organization.

b) Student – Staff

When an allegation is raised against a staff member, the DCPO is to be informed, who in turn will proceed to promptly inform the LCO and the HOS, who will investigate the evidence available in order to determine the best response. The DCPO will no longer be involved in the case or the investigation, and will be only informed of the outcome. During an investigation of a staff member, the school administration will protect the privacy of staff until circumstances are clarified and a formal decision is taken.

Minor infringements, especially of first occurrence, will not necessary require judicial measures unless otherwise determined fit by the DCPO's analysis. Therefore, in such cases, such incident will follow school regulations and policy to determine the correct response in coordination with a child protection agency, which may include:

- Return to work conditional on seeking psychological support e.g. anger management
- Suspension
- Dismissal

The HOS will be obligated to discuss the incident with the parents of the child subjected to abuse upon the resolution of the internal investigation that should be concluded

promptly.

When a child suffers significant harm from a staff member then the HOS or the LCO or the DCPO have a legal obligation to report the incident to a judicial authority as shown in Law 422/2002 in the DCPO Appendix 8.

The DCPO may want to inform Himaya.

c) Student – Parents

When the source of harm is the parent, then the DCPO would meet with the relevant staff member (who reported the suspicion) when necessary and consults the student when possible to determine the apparent level of risk and discuss the available courses of action.

If the risk level is characterized as ‘potential risk’, a child protection organization can be consulted to determine the best and safest possible response. Possible responses may include counselling, parental guidance or parental sessions offered by partner organizations

If the child is in imminent risk (see Appendix 2), the school has a legal obligation to refer the case to a judicial authority as outlined in the Referral pathway (see Appendix 1).

When it comes to caregivers and familial conflicts, WLC’s primary responsibility remains to report to a child protection organization.

8. Supporting our Community Members

Our aim is to create a culture where support can be requested by all members of WLC through connected and organized networks. Students, parent/guardian(s) and staff should communicate with the CPG to identify needs, issues and requests that will be discussed internally and, when possible, liaised to himaya or relevant organizations.

Further, WLC recognizes that staff and/or community members who become involved with a case of child harm may find the situation stressful and upsetting. The DCPO and HOS can discuss potential supportive strategies.

9. Confidentiality

WLC is well aware that all matters relating to child protection and safeguarding are confidential.

Accordingly, any documents that hold information that can harm a child will not be shared, except those required by an authoritative party involved in the reporting pathway of handling such cases (Appendix 1). Additionally, the DCPO will disclose any information about a child to other members of staff and/or authority on a need- to-know basis only. Rumors, details about incidents and cases that are spread by any members would constitute a break in confidentiality and would be referred to the CPG for appropriate action.

For cases of harm against children, all staff must be aware that the professional secrecy is lifted when informing/reporting (law 422, art. 26 and 23). All community members have the obligation to report cases of abuse and the right to report anonymously.

Any information disclosed by a child belongs to the child and therefore they must give consent before it is shared. A child should be given the opportunity to highlight certain information that they do not want disclosed to certain people such as their parents or individuals other than the DCPO. The only exception where a staff member may share information without the consent of the child is when the child's safety is in imminent risk. Even then, the staff member must explain the necessity of reporting to the child.

10. Monitoring and Evaluation

The information gathered from the focus group discussions and the survey, prior to the development of this policy, act as baseline data for evaluation. The same survey will be amended to target knowledge, opinions and CPP implementation and will be administered periodically to parent/guardian(s).

Additionally, pre-post tests will be conducted for every training and awareness session given by himaya. The information from the amended surveys and pre-post tests will be compared to baseline data for quantitative results and areas requiring improvements.

Moreover, the records of reporting forms will provide information on the number of reported cases within WLC and how each was managed. Finally, any observations and suggestions directed to the CPG will be noted and acted upon to improve the provisions of the policy.

11. Further information

As described in the above sections, the DCPO will be the focal point for all further inquiries related to the CPP implementation. The DCPO will have a more comprehensive version of the CPP to ease implementation with appendices on the following topics:

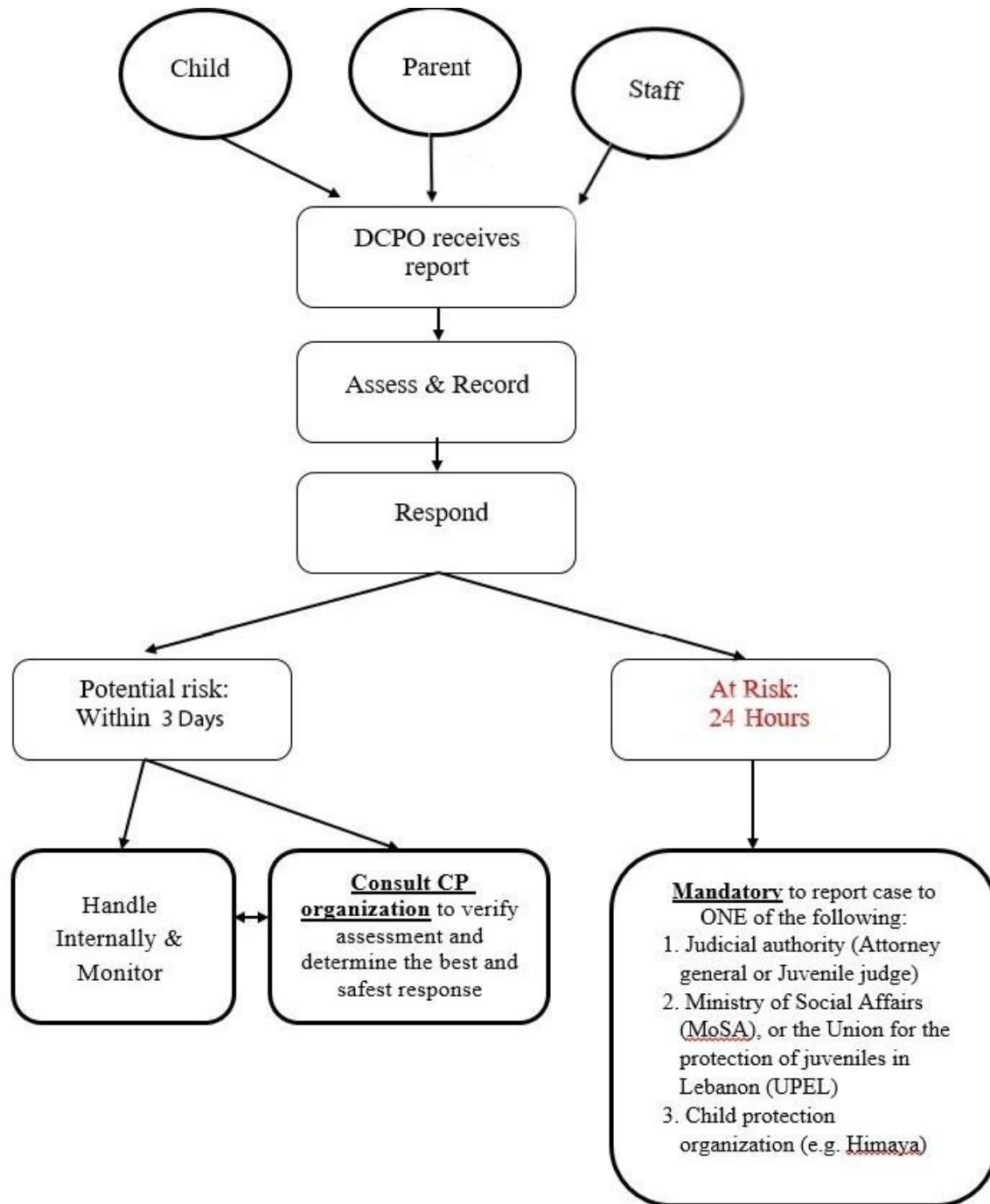
- Contact information of relevant organizations and references
- Risk Assessment
- Law 422/2002
- Reporting Form
- Guidelines for preferred DCPO characteristics
- Confidentiality and Data Protection guidelines
- Information for Nurse

Signature of Board Chairperson:

Date:

12. Appendices

Appendix 1: WLC's Referral Pathway and Procedure



I. DCPO receives a report

A report of abuse can be presented to the DCPO from multiple sources within the school. What is essential is that the confidentiality of individuals is respected by the different parties and that the incident is described to the DCPO with the consent of the child, when possible. In cases of imminent threat to a child, consent is no longer required. This pathway (see appendix 1) recognizes and applies to four reporting situations:

1. A child subjected to abuse outside school grounds, and reported the situation on school grounds.
2. A child subjected to abuse outside school grounds, and did not report. The abuse is suspected because the child showed/is showing signs (physical or behavioral) unusual of his/her regular situation, or began the school year with unusual signs of concern.
3. A child subjected to abuse on school grounds, with the source of abuse being a member of the staff.
4. A child subjected to abuse on school grounds, with the source of abuse being another child of his/her age, younger or older.

II. Assess and Record

The main goal of this step is to identify the risk level and to fill in the reporting form for future reference.

At this stage, the DCPO should record available information in the reporting form provided in (DCPO Appendix 9). The DCPO may meet with the different parties involved in the incident, but this may not be possible or necessary at all times especially when an incident has occurred outside of school grounds involving an individual that is not an active student or a parent. Sometimes a report from the child subjected to harm is more than enough and sometimes, when safe, the DCPO may choose to collect more information.

The DCPO should always consult a CP organization before assessing in order to

preserve the wellbeing of the child. Once information is collected, the DCPO will assess the severity of the case to determine if the child is facing imminent risk or potential risk, as outlined in Appendix 2.

III. Respond

When the case is assessed as a **potential risk** then the DCPO should contact a child protection organization in order to determine a suitable response. Minor incidents in school that breach school rules will be dealt with as per the school policies; however upon monitoring, if the incidents recur or worsen, then the DCPO should consult with a child protection organization.

In addition, the DCPO should also consult a child protection organization when abuse occurs outside of school grounds i.e. involving external parties (caregivers, youth or **others**). The DCPO should not attempt to intervene but rather should refer the case as per the pathway above depending on the risk. Also, when the DCPO is unsure of the classification of an incident then they must consult with a child protection organization before recommending any intervention via the school.

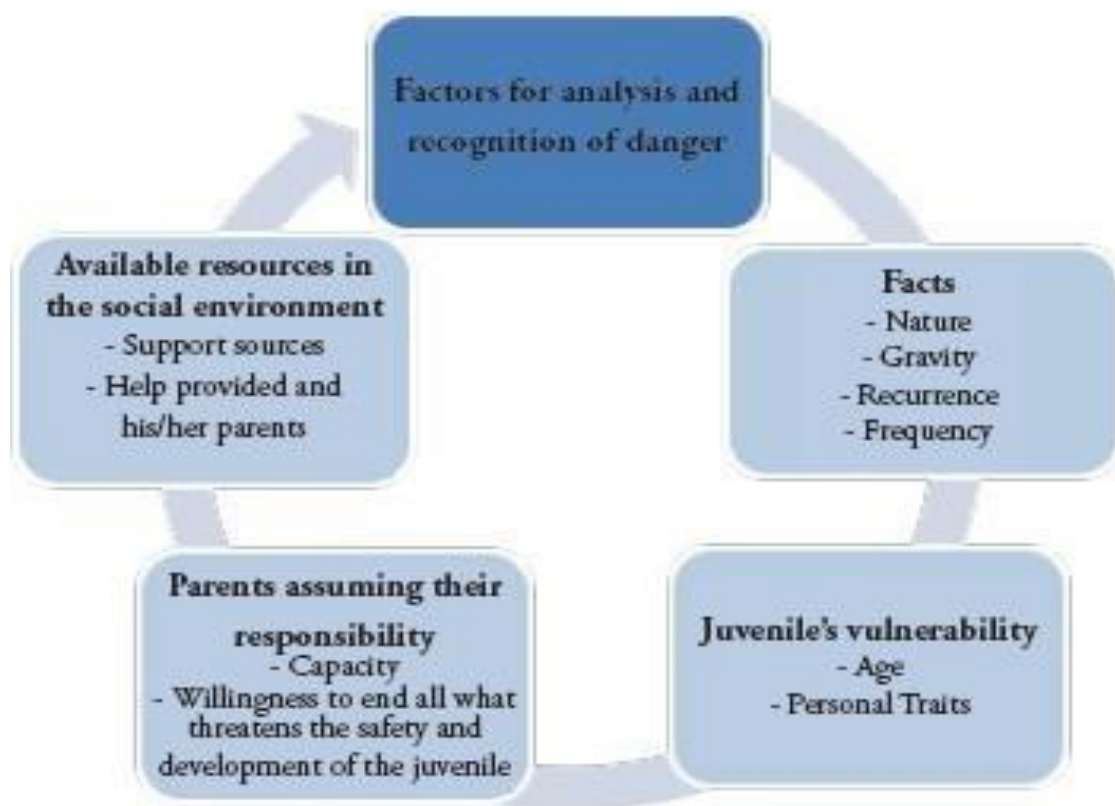
When the danger is assessed as **imminent risk** then the DCPO should proceed to report to a judicial authority as soon as possible.

Appendix 2: Defining Imminent and Potential Risk

Determining the level of risk in a case of child abuse depends on the dynamic analysis of four main factors as per the Standard Operating Procedures for Juvenile Protection in Lebanon (figure 1):

- The nature, gravity and recurrence of the reported facts
- The juvenile's age, personal traits and degree of vulnerability
- The ability and willingness of the parents/guardians to contribute to the safety and development of the juvenile
- The available social resources to provide assistance to the juvenile and his/her parents/guardians

Figure 1 - Main factors in risk analysis



The above figure shows the factors that a mandated social worker and Juvenile court investigates when a report is made.

To simplify the process for the school setting, the DCPO should focus on collecting information on the following factors for adequate assessment:

- Frequency of harm
- Type of harm
- Severity of harm
- Source of harm
- Duration of harm
- Probability of future harm
- Vulnerability of the child

The DCPO will have further information on the definitions of these factors in Appendix 7 for accurate assessment.

Indicators to identify the level of risk:

The following table will provide a non-exhaustive list of situations and signs that may indicate different types of abuse and their risks. For example, violent conduct is a form of physical abuse that may have limited effects if it is non- recurrent. The same conduct can have serious consequences and require immediate intervention when a child is exposed to recurrent and severe violence over a prolonged period of time.

It is important to note that minor incidents and those considered to pose potential risk should not be undermined as they may lead to greater threat.

Type of Abuse	Behavior/Observed in school	Reported from home
Physical	<ul style="list-style-type: none"> - Violent conduct - Coercion by peers - Physical harm e.g. bruises, wounds, burns, fractures or swelling 	<ul style="list-style-type: none"> - Coercion by family member - Corporal punishment - Physical harm e.g. bruises, wounds, burns, fractures or swelling
Psychological	<ul style="list-style-type: none"> - Intimidation - Bullying - Suicidal thoughts, self-harm or suspicious scars 	<ul style="list-style-type: none"> - Belittling, insulting or humiliation - Rejection, defamation, isolation or being dominated - Domestic violence and disputes at home
Neglect	<ul style="list-style-type: none"> - Lacking basic care (shelter, food, water, clothing, sanitation, education or healthcare) 	<ul style="list-style-type: none"> - Caregivers are emotionally distant - Child left alone to take care of themselves - Child is in danger or potential danger in their living conditions
Sexual	<ul style="list-style-type: none"> - Exposed to or witnesses sexual content - Inappropriate images taken by adult - Sexual behaviors with peers - Sexual exploitation - Rape or forced sex 	

Appendix 3: Required Recruitment Checks

Child protection requires additional recruitment procedures:

- Make sure HR personnel is fully briefed on the CPP.
- Background checks of the criminal record for the individual applying to any position within WLC. Should a felon account or suspicion report show up in this background check, the related individual can no longer be considered for recruitment.
- Requiring at least two references (not a family member or in a close relationship with the individual) for the individual's application. These references need to be checked for validity (to make sure they are real, and the contact information is valid).
- Paying attention to long or sudden gaps in the individual's working history, and questioning the reason behind the gap.
- Mention in advertisements that WLC abides by a Child Protection Policy e.g.
 - WLC has a child protection policy in place
 - Candidates will be expected to comply with WLC's child protection policy
- Successful candidates must accept and commit to the Child Protection Policy for working with children.
- If possible: Provide a copy or link to the CPP and give time to the applicant to ask questions on the CPP policy.

Appendix 4: Protection procedures when a volunteer or visitor is expected at school

Whenever a volunteer or visitor is expected to deliver services or conduct certain work on the school site, WLC will request prior written notification from the organization the individual is associated with. Upon arrival of the individual, WLC will require formal identification to check the described individual (from the notification) is the same person arriving.

If the individuals are expected to have prolonged exposure to students within the school setting they are required to be briefed. If the visit is short-term, a member of staff should be present to observe the activities to ensure no policies or rules are breached.

Finally, the visitor should always check-in and check-out at the entrance of the school as per protocol. When appropriate, visitors should be given restricted access to only specific areas of the school.

Appendix 5: Preferred DCPO characteristics

It is advisable for the DCPO to be recruited based on certain characteristics that would help fulfil the roles and responsibilities described above. As such a DCPO should:

- Understand and abide by good behavioral ethics
- Demonstrate good communication skills
- Be a full-time staff member for accessibility whenever needed
- Be a trusted member of the staff known among both teachers and students
- Experience and/or relevant training on child protection and working with children

Additionally, it is advisable for the DCPO to be a certified psychologist, or social worker, since either occupation helps an individual handle expected cases in terms of skill set and professional training.

DCPO Toolkit

Appendix 6: Contact information of relevant organizations

Reporting:

- Ministry of Social Affairs (MoSA) 01-429384
- Union for the protection of the juveniles in Lebanon (UPEL) 03-784265 / 01-427973
- Judicial Authority: General Prosecutor for child protection issues (Beirut) 03-683074
- Himaya (Beirut and Mount Lebanon Office) 71-913651 / 79-301124
- Himaya Hotline 03-414964

Training / Policy development:

- Himaya (Capacity Building Research and Development) 71-702316

Appendix 7: Risk Assessment

Below are the main factors that will help the DCPO assess the case and determine whether or not there is imminent risk to the child or potential risk. The DCPO should contact a child protection organization whenever they are uncertain of the outcome.

Frequency of harm	<ul style="list-style-type: none"> - Number of incidents over a time period - Knowing the incident is recurring - Concerns registered from the past
Type of harm	<ul style="list-style-type: none"> - Physical, psychological, sexual or neglect (can be more than one) - Any other types of abuse they are exposed to e.g. domestic violence or intimate partner violence
Severity	<ul style="list-style-type: none"> - How likely is the incident to cause harm - Potential impact of the harm or its signs in the school setting
Source of harm	<ul style="list-style-type: none"> - The relationship of the child and the perpetrator or source(s) of harm - The ability of the source of harm to reach the child
Duration	<ul style="list-style-type: none"> - The period of time in which the harm has occurred - Accumulation of harm over time and its impact
Probability	<ul style="list-style-type: none"> - Estimating the likelihood or probability that future harm will occur
Vulnerability	<ul style="list-style-type: none"> - Age of a child, any disabilities, medical conditions and social isolation

Risk assessment is dynamic as it provides a snapshot of the case which can change in the future, therefore ongoing monitoring of a child is necessary when they have not been referred. The objective of the risk assessment is to ensure the wellbeing of a child and identify the need for interventions in a timely manner.

It is not necessary to collect information on all of the factors listed above however, with as much information as possible, it will be possible to determine if there is imminent or potential risk.

Appendix 8: Law 422/2002

In this section you will find more information about Law 422/2002 on the Protection of Juveniles in Conflict with the Law and/or at Risk summarized in English as well as the original Arabic text of articles 25, 26 and 27 which are the most relevant for the purposes of this policy.

The full version of law 422/2002 is available in circulation online and can be accessed for those interested.

Law 422/2002 Overview

- On June 6, 2002 law 422 on the Protection of Juveniles in Conflict with the Law and/or at Risk was adopted
- The **law 422/2002** defines a **unified protection system** for any child/minor (human being under the age of eighteen) on the Lebanese territory
- It addresses the functioning of juvenile courts with an **emphasis** on **educational** and **rehabilitative** measures rather than punishment

According to **Article 25** of this law, the Child is considered exposed to danger when:

- He/she is in an environment exposing him to **exploitation** or **adversely affecting** his/her **health, safety, morality, or upbringing**
- He/she is exposed to **sexual abuse** or **violent corporal attack** beyond the customary non-harmful disciplinary measures
- He/she is found in a state of **vagrancy** or **homelessness**

Who can report?

According to the **Article 26** of the law 422/2002:

- Any person that has knowledge or doubts about a child being abused
- Any professional that is in contact with children (doctor, teacher, social worker, psychologist etc.)
- Parents or caregivers
- The child himself/herself

Mandatory reporting:

No person should conceal any facts or information related to the security and safety of a Child. It is the obligation of every person, whether a professional or not, who has doubts, facts or information that lead him/her to think that a juvenile may be at risk:

- To report such matters to the **judicial authorities**
- To inform the Ministry of Social Affairs **MOSA**
- To inform non-governmental organizations **NGO** (ex: himaya)
- Any person who informs/reports **can remain anonymous**
- **Professional secrecy is lifted** when reporting (art. 26, law 422/2002)

Failure to render assistance to any person in danger could be punished by law (art 567, Penal Code).

Original articles 25, 26 and 27 from law 422/2002

المادة 25

يُعتبر الحدث مهتددا في الأحوال الآتية:

- 1 إذا وجد في بيئة تعرّضه للإستغلال أو تهديد صحته أو سلامته أو أخلاقه أو ظروف تربيته.
 - 2 إذا تعرّض لاعتداء جنسي أو عنف جسدي ينجاوز حدود ما يبيحه العرف من ضرر وبب التاديب غير المؤذي.
 - 3 إذا ووجد متسولا أو مشردا.
- يُعتبر الحدث متسولا في إطرار هههههه القانون اذا المتهمن الاستدعاء الاحسان بأبي ووسيلة آانتت. وبيعتبر مشردا اذا ترك مسكنه ليعيش في الشوارع والمحلّات العامة أو لم يكن له مسكن ووجد في الحالة الموصوفة آنفا.

المادة 26

للقاضي في ألي من هههههه الأحوال، ان يتخذ لصالح الحدث المذدأورر تدابير الحماية أو الحرية المراربة أو الإصلاح عند الاقتضاء.

يبتدخّل القاضي في هههههه الأحوال بناء على شكوى الحدث أو الحد والدديه أو أوليائه أو اوصيائه أو الأشخاص المسؤولين عنه أو المندوب الاجتماعي أو النيابة العامة أو بناء على إخبار. عليه التدخل تلقائيا في الحالات التي تستدعي العجلة. على النيابة العامة أو قاضي الأحداث ان يأمّر بإجراء تحقيق اجتماعي وان يستمع الى الحدث

وووالندييهه اوو الحددهههها اوو الووصي الشرعي اوو الأشخاص المسؤؤوليين عنهه، ووذلك قبل إلتخاذ البي تدبير بحقه ما لم يكن هههناك علة في الأمر فيكون ممكنا إلتخاذ التدبير الملائم قبل استكمال الإجراءاء الت السالف ذآرر هههها. وويمكن الاستعان بالضابطة العدلية لتقصي المعلومات في الموضوع.

لا يعتبر إفتاء لسر المهنة ولا يقع تحت طائلة الحكام قانون العقوبات البي إخبار بقددم الى المرجع الصالح ممن ههههه مطلع بحكم ووضعه اوو وظيفته اوو فنه على ظروروف الحدت المعروض للخطر في الأحوال المحددة في المادة 25 من هههذال القانون.

المادة 27

بقي الحدت قدر المستطاع في بيئته الطبيعية، على ان يعين شخصا او مؤسسة للقاضي بعد الإستماع الى الوالدين او الحددههها ن الاجتماعية للمرأة ووالدها والصحة والمشورة للأهله والأولياء ومساعدتهم في تربيته، وعلى ان يقدم هههذال الشخص او المؤسسة الى القاضي تقريراً دورياً بتطور حالته. وللقاضي، اذا قرر إبقاء الحدت في بيئته، ان يفرض عليه وعلى المسؤؤولين عنه موجبات محددة، أأن يبدخل مدرسة او مؤسسة اجتماعية او صحية متخصصة ان يقوم بعمل مهني ما. للقاضي فرض التدابير المنووه عنها اعلاه في حال خروج الحدت على سلطة الهههله ووالديه ووالديه ووالديه سوء السلوك الذي يعرضه للمخاطر السابق ذآرر هههها ووذلك بناء على شوى هههؤلاء او طلب المندوب الاجتماعي.

Appendix 9: Reporting form

It is not necessary to fill in the entire table as this form aims to facilitate contact with the child subjected to harm and their family.

Organization			
Organization name			
Organization address			
DCPO name			
DCPO contact			
Student Description			
Full name			
Nationality			
Gender			
Age			
Address and contact number of beneficiary			
Social networks likely to support the child (family, associations, institutions, school...)			
Family of child subjected to harm			
Family member	Name	Present (Yes/No)	Address and Telephone number
Father			
Mother			
Sibling			
Sibling			
Sibling			
Other			
Other			
About your concern			
Was the abuse observed or suspected?			
Is this concern based on firsthand information or information divulged to you by someone else? (If so, who?)			
Did the child disclose the abuse to you directly?			
Date & Time of incident			

Location of incident	
Name and job title of alleged perpetrator	
Description of incident	
Your personal observations (visible injuries, child's emotional state, etc.)	

This form must remain confidential and must be preserved in a secure location where access is limited to the DCPO.

Signature: _____

Date: _____

Appendix 10: Confidentiality and Data Protection

Confidentiality:

- The information collected from the child belongs to them therefore it should only be shared with the consent of the child.
- Only when deemed necessary should information be shared against the will of the child (e.g. High-risk cases that require CP organizations intervention) but the reason for why should be explained to them nonetheless.
- Children should be given the opportunity to highlight information that they do not want disclosed to particular people.
- A child has the right to view any information written about them at any time.
- Information should only be passed to the person that is meant to receive this information.
- **Need-to-know:** the limiting of information that is considered sensitive, and sharing it only with those individuals for whom the information will enable to protect the child.

Paper Records Security:

- Label the files individually using the branch location, initials of the child and a code consisting of the Day, Month and year e.g. Mathaf – RL130617 or City Centre – AS150217
- At no time should the child's name appear on the outside of the file.
- Kept in a secure place with limited access and locked in a cabinet.
- Room should be locked when the person responsible is not inside of it.

Security of copies stored on a PC:

- The PC should be password protected and in a room with limited access.
- Updated anti-virus should be on the computer.
- All records should be saved in a single folder that is not obvious to find on the

desktop

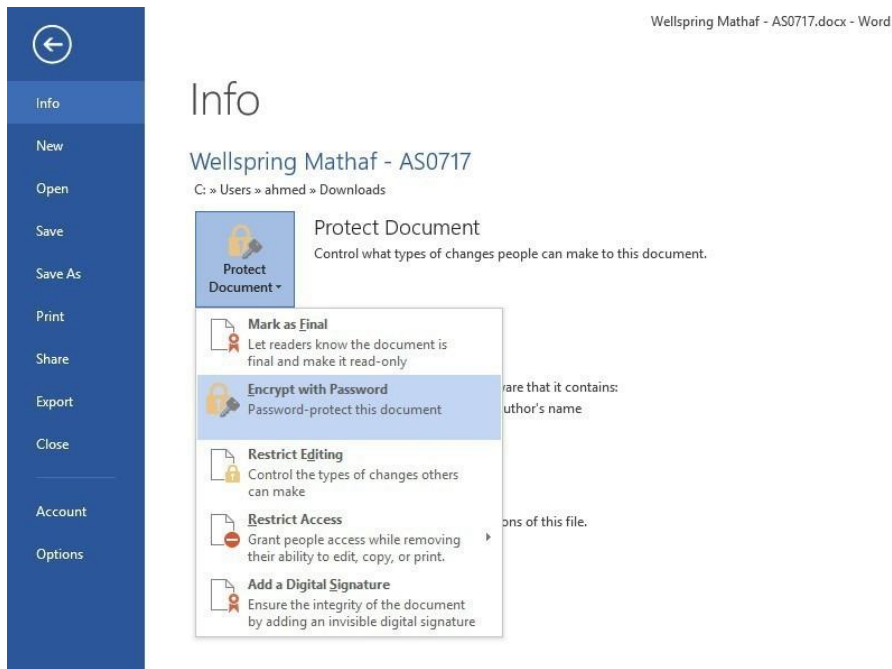
- Records should be labelled using the branch location, initials of the child and a code consisting of the Day, Month and year e.g. Mathaf – RL130617 or City Centre – AS150217
- All records with sensitive information should be password encrypted on Microsoft word.
- Passwords should be recorded and saved in the DCPO's email using only the label that is common to the written form and the soft copy.
- The child's name should not be recorded on the file name or any document that is not encrypted.

How to encrypt a Word Document:

N.B. This process may defer depending on the version of Microsoft Word that is being employed. In case of any discrepancy, kindly search for the steps on Google.com or on Microsoft Word Help (Click F1).

The process of encryption is important to ensure that, in the case that there is any unauthorized access to the PC, then sensitive information will remain secure.

- 1- Click on "File" on the top left corner of the page
- 2- On the Info tab you will see the "Protect Document" option
- 3- Click on "Protect Document" and select "Encrypt with Password"



- 4- Select the password and re-enter it for confirmation.



- 5- Make sure to save your document and to close it once you have finished viewing it.

Appendix 11: Information for the Nurse

The DCPO should share this basic information with the nurse and clarify the referral pathway.

Mandatory reporting under Law 422/2002:

If a nurse is concerned about breaching professional secrecy, then Law 422/2002 can be referenced:

- Any person who informs/reports **can remain anonymous**
- **Professional secrecy is lifted** when reporting (art. 26, law 422/2002)
- **Failure** to render assistance to any person in danger **could be punished by law (art 567, Penal Code)**

Clinical presentations:

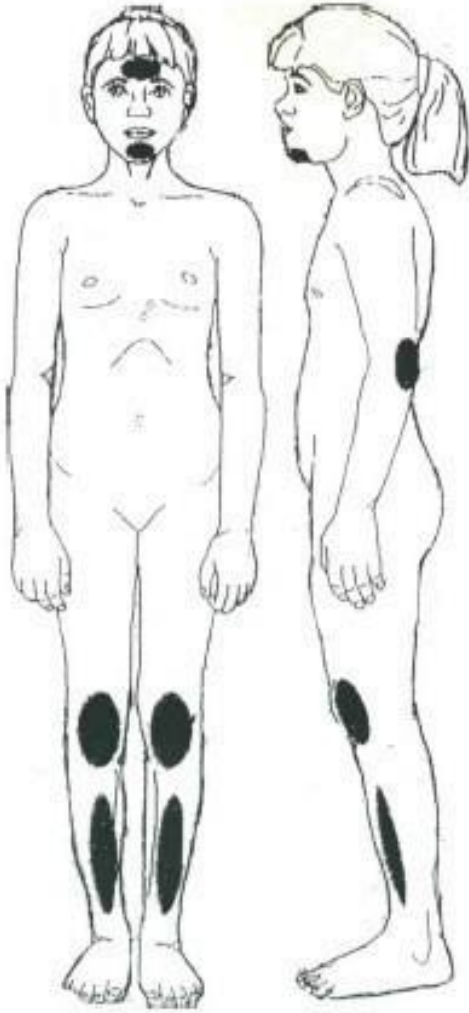
Potential and general clinical presentations of child abuse and neglect:

- | | |
|---|--|
| - Recurrent accidents | care of them |
| - Recurrent bruising/injuries | - Rope burns |
| - Delay in seeking care | - Unexplained or unusual burns e.g. |
| - Past history of child maltreatment | cigarette burns |
| - Lack of hygiene | - Infected burns or injuries |
| - Anxiety | - Bruising with unusual shapes |
| - Depression | - Bedwetting or nightmares |
| - Multiple bruises | - Pain and irritation of the genitals |
| - Demonstrating an unusual amount of sexual behavior or knowledge | - Bruising and bleeding of vaginal or anal areas |
| - Expresses fear of going home | - Recurrent unexplained headaches |
| - Stating that there is no one to take | |

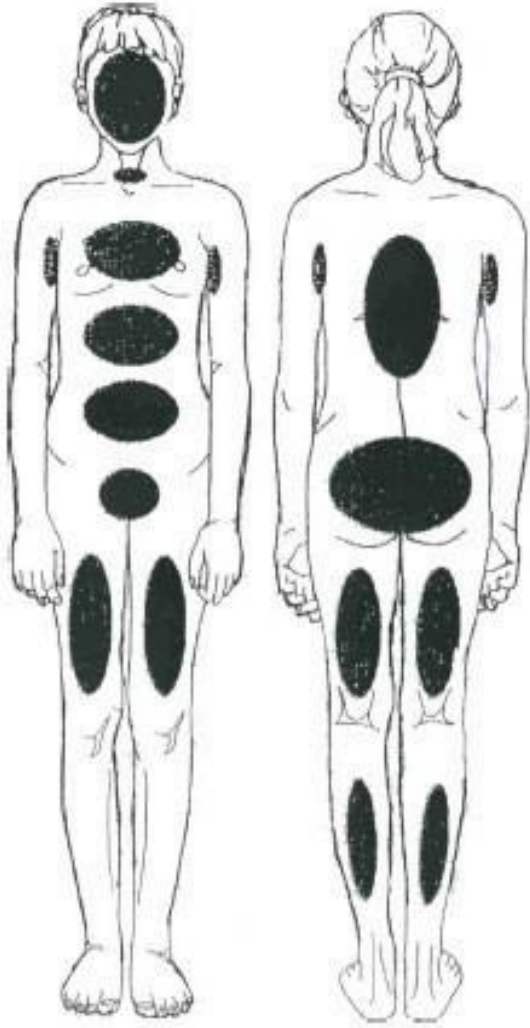
N.B. Some indicators mentioned in the above table are very general and on their own may not be enough to detect child abuse.

The following diagram displays areas of the body that **may** indicate child abuse upon examination:

Normal Bruising



Suspicious Bruising



Building trust: Child-friendly communication

When interacting with a child that you suspect to be abused follow the guidelines mentioned in the Staff subsection (Section 6c) that in essence require you to:

- Display sensitivity by respecting the child's boundaries and not pushing for details
- Provide reassurance that the child has the right to be safe and is brave for informing you
- Clarify that abuse is abnormal and in no way the child's fault
- Inform them that the next thing to do is to inform the DCPO to identify ways to support the child

Appendix 12: General Guidelines for Internal Personnel Investigations

This document provides general guidance on how to conduct an internal investigation of personnel in an organization. This document in itself is insufficient for conducting an effective investigation as investigators typically have specialized training and as the organization itself should work to further develop its own internal proceedings; further resources will be provided at the end of the document.

a. Internal Investigations

An internal investigation may be required when credible information indicates significant wrongdoing, misconduct or ethical lapses towards a child or children in the organization. An investigation in a school is typically done when there are allegations that a staff member has violated professional conduct, code of ethics, a school policy or a law. Allegations may come from multiple sources including faculty, non-teaching staff, parents or students.

b. Purpose of Investigations

The purpose of an investigation is to obtain relevant and accurate information to make informed decisions about whether or not an allegation or a complaint is true. It is a fact-finding exercise that will determine the validity of claims and inform the response to the subject of investigation. The process may include reviewing documents, obtaining different forms of evidence, interviewing witnesses or the child subjected to harm and interviewing the subject of investigation. Investigations should be conducted quickly, fairly, transparently, consistently and in a manner that provides effective protection for the child whilst also protecting the rights of the person accused. While each investigation is unique, and may require different amounts of time, it is important to carry out investigations and complete them as fast as possible. This will ensure that innocent individuals will be cleared as soon as possible and that further misconduct will be prevented.

When there are allegations of criminal conduct then it is the immediate responsibility of the school to report to the appropriate national or governmental agency; the school will not conduct or continue an investigation (for instance, if there is alarming evidence of an employee producing child pornography; emerging evidence of sexually grooming children; or conduct of criminal offenses such as illicit drug dealing...)

c. Internal investigation committee:

An investigation committee should convene to explore allegations against staff members when the accusation is serious enough to warrant such an investigation. The aim of the process is to examine accusations and to identify the most appropriate response.

Composition:

The investigation committee should be pre-defined by the organization and would ideally be composed of some of the following:

- The HOS
- DCPO
- The Principal
- A member of the board of directors: chairperson
- Member of the teacher committee
- LCO

It is preferable to have a small number of people (e.g. 3-5) in the committee to improve coordination, to improve efficiency and to limit the risk of spreading information about the investigation. Other actors can be consulted at specific stages of the investigation.

Responsibilities:

The person(s) conducting the investigation should:

- Identify potential bias and conflict of interest prior to the investigation
- Ensure fair, consistent and professional interactions with all participants
- Ensure that fairness is strictly applied throughout the investigation
- Adhere to a sound investigation process
- Document all steps taken in an appropriate manner
- Limit the investigation to relevant facts and avoid pursuing irrelevant background information
- Maintain sensitivity to the emotions of interviewees or persons involved in the investigation
- Accommodate to special needs such as language barriers or illness
- Refuse ‘off the record’ conversations

To explicitly define the roles and responsibilities of the investigation committee, the organization is encouraged to create “Terms of Reference (ToR)” to be signed by all members of the committee.

Lead Investigation Officer:

A person should be nominated to be the lead/main investigating officer that will lead the committee and maintain its conduct. This person is expected to abide by the responsibilities outlined above and, most importantly, to ensure that the investigation is organized, fair, transparent and consistent. This includes ensuring that the members of the investigation do not have a conflict of interest and are not involved in the actual allegation.

d. Investigation Process

1. Preparation:

The internal investigation committee will identify the lead investigating officer, allegation(s) and person(s) to interview. At this stage, it is important outline the investigation process.

2. Gathering evidence:

The investigator(s) will gather all available information and evidence including: the initial report and any other available information (camera footage, photographs, security records etc.).

Preliminary assessment: threat of harm

An initial assessment should be done by this stage to determine if there is an ongoing threat of harm. If the person under investigation poses a risk of harm to other employees, children or the public then steps should be taken to prevent this. For instance, if a person that has regular contact with students is being accused of inappropriate behavior with children then the organization may choose to temporarily reassign the person or suspend them pending the findings of the investigation. In contrast, if the accusation is based on an action in the past and it is unlikely that the accused will pose any harm to others then it may be unnecessary to intervene. In both cases, the nature and severity of the accusation should be used to clearly justify a preventive action by the school.

3. Conducting interviews:

The investigator(s) will meet with concerned individuals including: the reporter, the subject of investigation, the child subjected to harm, the child's parents (when applicable) and any relevant witnesses. Investigators should always be mindful of the "do no harm" principle, therefore should not set meetings with individuals if it is deemed unsafe.

General guidelines for interviews:

- Interviews should be carried out as soon as possible
- A familiar venue and suitable time should be selected to reduce stress

- Each person should be interviewed individually
- At the start of an interview, a general explanation of the purpose of the investigation should be provided
- At the start of the interview, highlight to all parties that the discussions are all confidential
- Intimidation techniques are not acceptable during an interview, rather, individuals must be encouraged to express themselves openly
- At the end of the interview, the interviewee should be informed of the next steps and what is expected of them – if anything

Involving students in investigations:

- The parents of the student should be informed of an incident that resulted in harm to their child, when the student is needed for an interview, the investigation process and its result
- A social worker or psychologist or counselor should be present for support during interviews with children; the professional should debrief the child
- Approval should be obtained from parents before meeting with the child
- If the student is below 15 years old, the parents should be present during the interview
- If the student is 15 years old or above, they can be escorted by their parents to the interview venue but should be interviewed alone
- If it is necessary for a student to come face to face with the accused faculty/staff member in the context of the investigation, the student should be briefed by a professional

Guidelines for asking questions:

As a general guideline, questions should be open-ended and should not be leading. Some examples of questions include:

- What happened?
- Who was the alleged harasser/perpetrator?
- Where did the incident occur?
- When did the incident occur?
- Can you identify any witnesses?

- Was the incident limited to one instance or was it recurrent nature?
- How did the child react?
- Did the reporter discuss or report the incident to anyone else?

Documentation

As much as possible, investigators should document everything including the general process followed, meetings, interviews and conversations. Clear documentation will protect the school and the investigation in case of scrutiny or legal escalation, as it justifies the school's responses. Certain steps will be taken to ensure confidentiality; *See the section on confidentiality below.*

4. Evaluating evidence:

Once interviews have been concluded, witness credibility is assessed and evidence is evaluated. Consideration needs to be given to:

- The integrity of the evidence collected
- Whose version of events makes the most sense
- Whose version is corroborated by other evidence

5. Writing a Report

After the investigation is completed, it is highly recommended that the investigator(s) write a report. It should be comprehensive and sufficiently detailed to enable decisions to be made with regards to the employee. The report will enhance transparency, demonstrate and protect the organization in case of any legal escalation. The written report should include sections on the:

- Context of investigation
- Process of investigation
- Allegations investigated and evidence gathered
- Analysis of evidence
- Relevant conclusions

6. Determining next steps:

Based on the findings, the final report, the investigation committee should determine an appropriate response to the allegation. If the head of school is not part of the committee, then the committee may suggest actions to be taken and forward the final report for a decision to be made. The administration may decide to apply internal disciplinary proceedings, refer to authorities or refer the child to child protection organization. Possible disciplinary responses may include: mandatory psychological support, suspension, demotion, reassignment and dismissal.

Further Considerations

➤ Confidentiality

The entirety of the investigation should be kept confidential starting with when the report is received. Confidentiality means that participants should not speak about the investigation to other staff, including other witnesses involved in the matter. The fact that an investigation is underway, its subject, the processes followed, the materials gathered and, especially, the results of the investigation must always be treated confidentially.

Failing to ensure confidentiality can lead to:

- Damage to an individual's reputation especially when innocent
- Damage to the organization's reputation and negative publicity
- Cover up of evidence by the accused that can hinder investigation

If any person involved in the investigation is found to have leaked information and breached the condition of confidentiality then there should be disciplinary repercussions.

➤ Data Storage

Documents relating to an investigation must be retained, in a secure place, by the school together with a written record of the outcome of the investigation and, where disciplinary action has been taken, retained on the member of staff's, or student's, personal and confidential file in

accordance with the school's disciplinary procedures. Anything documented must be stored securely in a password-protected folder on a password-protected computer. Anything printed must be stored securely in a folder placed in a locked drawer with limited access.

➤ **Protecting reporters**

Those who report possible or actual misconduct and those who cooperate in an investigation must be protected from retaliation. An employee will only provide information if they believe that they will not be penalized for doing so. Those participating in investigations should take all steps necessary to protect whistleblowers and those who cooperate in the investigation.

➤ **Support for individuals under investigation**

Being under investigation can be very stressful. To limit the negative effects on individuals under investigation, investigators should:

- Inform them of concerns or allegations as soon as possible
- Provide an explanation of the likely course of action
- Provide them with clear explanations as to the process
- Explain confidentiality and steps being taken to maintain it

➤ **Suspending the subject of investigations**

The head of school in consultation with the LCO will determine whether or not the employee should be suspended during the investigation according to, but not limited to the following reasons:

- Seriousness of the alleged misconduct
- Likelihood of the employee interfering with the investigation
- Potential of employee's presence in the workplace causing harm to himself/herself or to other employees, students or organization
- Cause to suspect that the student is at risk of serious harm

Suspension is not in itself a disciplinary sanction though it should not be undertaken without good reason. Suspension may be considered at any stage of an investigation.

➤ **False allegations**

While false allegations by a staff member or a child are rare, if the investigation shows that the allegation was false, then it will become imperative to distinguish between misinterpreted signs and a malicious attack on an individual. The following considerations and responses can be taken:

- i. **Child:** If after the investigation it is determined that the child has made a false allegation of abuse, this could be an indicator of problems elsewhere which requires further exploration via counseling or referral to an external professional.

If it is clear that the allegation has been made maliciously, then the Head of School, in coordination with the DCPO, should consider whether or not it is appropriate to implement the school's disciplinary procedure against the student.

- ii. **Staff:** If after the investigation it is determined that a staff member has made a malicious false allegation against another staff member, then the Head of School and the LCO should also consider how the school's disciplinary procedure can appropriately respond to the staff member.

➤ **Communicating with parents**

The parents of a student who has been involved in an allegation should be made aware of the allegation as soon as possible. The head of school, with the support of the LCO and investigation committee, can outline (briefly) to parents what the incident being investigated is, how the school is responding to it i.e. investigation procedure, reassure parents that their child is at no risk and highlight the importance of maintaining confidentiality at the early stages of the investigation. If the child will be asked to be interviewed, the parents should be also be made aware of this; parents can only be present with the child during the interview if the child is below 15 years of age. Parents should also be kept informed about the progress of the case, without any details, and told the final outcome.

In cases where a student has suffered an injury or any harm, parents will need to be notified immediately.

➤ Communicating with the community after an incident

When an incident occurs at the school, the reputation of the school can become compromised due to negative publicity. How an organization reacts to such incidents is critical. The school is advised to consult with counsel to determine what message they want to convey and highlight any limitations on the school's commentary.

In general, a statement should contain: a brief description of the event (without divulging the identities of the concerned persons), the actions the school took and a reassurance that there is no current risk to children at the school. The school should highlight that it acted quickly and transparently using its policies and procedures including the child protection policy.

References

- ✓ ACAS (Advisory, Conciliation and Arbitration Service). *Guidance: Conducting Workplace investigations.*
http://www.acas.org.uk/media/pdf/q/0/Conducting_Workplace_Investigations_Nov.pdf
- ✓ BC Human Rights Coalition. *Conducting Internal Investigations.*
<https://d3n8a8pro7vnm.cloudfront.net/clastest/pages/223/attachments/original/1427236373/InternalInvestigation.pdf?1427236373>
- ✓ Corporate Compliance. *Guide to Conducting Workplace Investigations.*
http://www.corporatecompliance.org/Portals/1/Users/169/29/60329/Workplace_Investigations_Guide.pdf.
- ✓ ICMEC (International Center for Missing & Exploited Children). *Incident Response.*
<https://www.icmec.org/education-portal/incident-response/>
- ✓ Royal Commission into Institutional Responses to Child Sexual Abuse. *Catholic Education Diocese of Cairns Employee misconduct and investigation processes.*
<https://www.childabuseroyalcommission.gov.au/sites/default/files/CTJH.180.90001.0083.pdf>

Investigation tool templates:

- ✓ ACAS (Advisory, Conciliation and Arbitration Service). *Carrying out investigations in the workplace.* <http://www.acas.org.uk/index.aspx?articleid=5507>

Appendix 13: Virtual Learning and Consent for Recording

WLC Learning Community has established virtual learning to provide an alternate way of education when needed. Therefore, the school realizes the importance of using the Internet, which enables students to take advantage of the available opportunities to collect information and connect with the community, despite some risks that they may be exposed to as a result of the excessive use of this technology, including cyber-bullying and the violation of privacy and the negative repercussions associated with that on the child's safety.

In order to achieve child protection during the virtual learning period, all stakeholders, starting with the school administration and educators, and ending with parents and caregivers, should unite efforts to ensure the safety of students during their use of the Internet and to educate them about the accompanying risks, as well as the importance of referring them to the individuals designated to dealing with such issues, in order to provide the required intervention in the event that any student is exposed to any of the risks and thus violence.

The Internet and Multiple Risks

Prolonged use of the Internet between virtual learning and entertainment can expose the child to some risks that have negative repercussions on their physical and psychological wellbeing, these include: cyberbullying, violation of privacy, encountering violent or sexual content, accessing content that can lead to self-harm or harm to others and content that might urge the child to commit illegal acts.

The school administration has implemented necessary measures and procedures to protect students during virtual learning, to educate them about the risks associated with it, as well as help them balance their hours of use of the Internet and remind them of the importance of seeking help/ referring to an adult when feeling uncomfortable, unsafe or threatened.

Administration and Staff

The administration has an important role in protecting students during virtual learning, through the following measures:

- The DCPO and LCO will educate and guide teachers and staff about the necessary expectations and procedures, and follow-up intensively in order to provide support to students when needed.
- Ensure students' privacy by obtaining written parental consent at the beginning of each academic year (page 63).
- Provide the necessary support to the DCPO when monitoring and following up any suspected or violent case.
- Avoid recording (voice or sound and image) classes remotely except when necessary and after obtaining written consent from parents at the beginning of each academic year.
- Obtaining consent prior to asking any student to send videos and pictures of themselves as proof of learning.
- The school will save the recording files and videos on password protected computers.
- In order to secure child protection during virtual education, school teachers, staff and administration must adhere to the following:
 - o Continue to adhere to the school's code of conduct and staff handbook.
 - o Teach and communicate with students only by using the applications specified by the school administration and within the agreed lesson times.
 - o Teach lessons in an appropriate setting.
 - o Adhere to the approved dress code while using the video during the educational session.
 - o Preserve the confidentiality and privacy of students by refraining from sharing their information with any party from inside and outside the school with the exception of the principal, the HOS and the DCPO.
 - o Always remind students of the importance of creating a password for the applications used to follow lessons and social media and keeping them private.
 - o Remind students of the importance of communicating with them or their parents or with the authority concerned with child protection at school, directly when they are

concerned about any act or behavior on the Internet, or when they are exposed to any form of violence.

- Administration, staff and teachers to report any concerning information to DCPO.
- Contact the school DCPO directly when monitoring any indicators related to violence and informing him of the necessary data while maintaining the principle of confidentiality.

Parents and caregivers:

Parents have an essential role in managing and directing their children's use of the Internet through:

- Being aware in advance of the dangers of using the Internet, and the materials, services and applications used by their children.
- Ensuring that their children understand the potential dangers of the internet.
- Securing a quiet place at home, where the student can follow virtual classes.
- Setting clear rules and expectations of using the Internet, such as specifying the required time period for this use (hours devoted to virtual learning and those designated for entertainment).
- Reminding their children of the necessity not to share private information on social media sites such as passwords, residential address, private photos, and other information and personal contents.
- Not sharing information about their children on the Internet and not to give permission to share pictures of their children and / or videos of them except for purely educational purposes.
- Imposing restrictions on websites that contain pornographic material - by requesting Parents Control Services or other monitoring services.
- Encouraging children to share any concerns.
- Ensuring that their children are balanced and healthy by making sure they take time out to exercise and eat healthy meals on a regular basis.
- Informing the school DCPO about any risks their children may face while using the Internet.

Students:

Students play an essential role in protecting themselves from violence and exploitation via the Internet, so it is necessary to enable them to:

- Manage their online presence and protect their personal data by creating passwords and not sharing them with anyone other than the parents.
- Determine the private information that cannot be shared publicly on social networking sites and other sites such as home address or others.
- Refuse friend requests from people they do not know and implement privacy settings.
- Communicate with their families and / or the DCPO when they have any concerns or access any inappropriate information.

In order to educate students and enable them to protect themselves from the potential dangers of spending a long time on the Internet, the DCPO in the school and / or teachers must share the following instructions with them:

- The Internet is considered a "place" that is why the golden rule applies to it: "You must not go anywhere without your parents' permission." Accordingly, parental consent for websites and applications should be obtained before using them.
- All games that require communication with other players can be dangerous because they are strangers. It is essential to avoid these types of games or play them offline. Pay attention to whom you talk to and do not easily trust others.
- Searching or browsing the Internet from one site to another can be dangerous because it may lead to inappropriate content (sexual or violent). To avoid this, it is important to apply the five-click rule: You can only go from one site to another 5 times before you can return to the home page.
- Never click on random links or ads that you see on the Internet, as they usually promise you games or a prize of some kind, but beware: they always contain viruses or tricks.
- Avoid buying anything online without talking to your parents first. Some ads may try to deceive you by offering free things or telling you that you have won something, as this is a way to collect your personal information.

- It is necessary to speak with your parents when receiving a new email (especially if it comes from an unknown source) or when downloading software (download / install software).
- Attachments sometimes contain viruses, so never open an attachment from someone you don't know.
- Please share your password only with your parents.
- Always set up the privacy of your accounts to ensure that strangers are not able to access your information or communicate with you.
- Avoid talking with someone you do not know, especially when you feel that the conversation is strange or suspicious.
- Please inform the DCPO or adult you trust directly if you feel that you are upset or concerned about any conversation or content you have been exposed to.
- It is better to avoid opening a video chat with strangers; you can never know who the other person is and what they will show you.

Written Consent:

WLC Learning Community adopts a child protection policy, which includes guidelines and procedures aimed at promoting and ensuring a safe and secure environment for students, by working to prevent harm or violence against children in all its forms and to determine the appropriate response to any form of abuse monitored by the school.

From this standpoint, the school emphasizes the following responsibilities:

- The recorded videos or audio recordings taken for children during the class are only part of the learning objectives.
- The recorded sessions videos or audio recordings will not be published, but the school will share them with parents and students as aids to understand the explanation.
- Recording videos during class requires obtaining the written consent of the child's family at the beginning of each academic year.
- This recording will only take place during the educational lessons, after verbally informing the children of the start of the recording process.

- The recorded videos or audio recordings taken for children during the class that do not fall within the framework of the learning objectives, expose teachers to accountability.

Giving consent:

- I, Mr. (s) _____, the guardian of the child _____, have read the above, and I am granting permission to the school to record educational classes.

Name and signature of the parent / legal guardian _____

Date _____

- I _____, have received help from my family to understand the contents of the appendix and agree to the process of recording educational lessons when needed.

Name and signature of the child _____

Date _____

إبداء الموافقة:

- أنا، السيد (ة).....، ولي أمر الطفل، لقد اطلعت على ما ورد أعلاه، وأنا أمنح الإذن للمدرسة بتسجيل الحصص التعليمية.

إسم وتوقيع ولي الأمر/الوصي القانوني التاريخ

- أنا،، ساعدني أهلي على فهم مضمون الملحق وأوافق على عملية تسجيل الحصص التعليمية عند الحاجة.

إسم وتوقيع الطفل التاريخ

Appendix 14: Disciplinary Procedures

Abuse of any kind toward a WLC student will not be tolerated.

A staff member believed to be responsible for any form of abuse will be subject to disciplinary inquiry, possible legal action and /or termination.

All incidents of abuse must be reported immediately. Any reported case of abuse will be taken seriously. It will be promptly investigated, handled as confidentially as possible and appropriate measures shall be taken.

Disciplinary Procedures

When Wellspring Learning Community believes that a staff member has committed any kind of abuse, the staff member will face a disciplinary action and possible legal actions according to the Lebanese Law.

In cases of abuse allegations against a staff member, WLC has the right to impose any of the following disciplinary actions against him/her, depending on the severity of the allegation:

- a. Deduction of salary for a time interval not exceeding 10 days per academic year
- b. Delay in pay scale progression for a maximum of 2 years
- c. Suspension from work with pay
- d. Suspension from work without pay
- e. Dismissal from work without any material compensation.
- f. Immediate termination of contract
- g. Other judicial measures.

In case of any allegations, WLC also has the option to suspend the staff member while the investigation committee makes an inquiry into the allegations.

Any disciplinary action determined by WLC shall be consistent with the provisions of the Lebanese Law.