



Wellspring

Child Protection Policy

Last Review: August 2026

Review cycle: 2 years

Next Review: August 2028



COUNCIL OF
INTERNATIONAL
SCHOOLS



Wellspring

Child Protection Policy

Contributors to the 2026 Review:

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Related Policies:

Wellspring Guiding Statements

Safeguarding Policy

Recruitment policy

Wellbeing Policy

Staff Handbook

Code of Ethical Conduct

Bring Your Own Device Policy

Data Safeguarding Policy

Approvals – Names and Signatures:

Chairperson of the Board

Head of School

The Wellspring Learning Community Child Protection Policy was established and adopted in June 2017 by Wellspring Learning Community 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. The proposed date for the next review of this policy document is August 2028.

Through this partnership, himaya promises to support Wellspring in all cases of violation detected, services required and implementation procedures for this CPP.

Wellspring Learning Community's Mission Statement

Wellspring aims to establish an inquiry-based learning environment in which students from diverse backgrounds are given every opportunity to optimize their social, emotional, and academic capacities and talents. Our students will become confident, resourceful, creative, caring, responsible global and local citizens prepared to use their education to contribute in meaningful ways towards improving society, both locally and internationally.

Rationale

Wellspring Learning Community (Wellspring) is committed to providing a safe, respectful environment where all children are protected from violence, abuse, neglect, and exploitation.

- **Coverage:** Applies to all registered Wellspring students on and off school grounds, including transport, facilities, and overseas trips.
- **Jurisdiction:** Extends to any harm detected on school grounds, regardless of where the violence occurred.
- **Legal Alignment:** Complies with the UN Convention on the Rights of the Child (CRC) and Lebanese Law 422/2002 (Articles 25, 26, 27).

Safeguarding and Child Protection Policies

The Wellspring Safeguarding Policy (SP) is intrinsically linked to the Wellspring Child Protection Policy (CPP). While the Safeguarding Policy provides the overarching and proactive framework that establishes a culture of safety and ensures that all members of the community, particularly students, are protected from harm, violence, abuse, and neglect, the Child Protection Policy serves as the specific, reactive component of that framework.

The CPP outlines the procedures and actions required when there are concerns that a child may have been subjected to harm, violence, abuse, or neglect. It functions as an operational guide, detailing reporting pathways, designated safeguarding roles and responsibilities, documentation requirements, audit trails, and compliance with statutory and legal obligations.

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At Wellspring, safeguarding and child protection are viewed as complementary and interconnected responsibilities. Accordingly, the Safeguarding Team and the Child Protection Team operate as one unified team, working collaboratively to prevent harm, respond effectively to concerns, and promote the safety and wellbeing of every child.

Roles and Responsibilities

Designated Safeguarding Trustee (DST)

The DST is a designated board member who holds the school leadership accountable for safeguarding standards. The DST:

- Acts as a role model for the school representatives and empowers the Safeguarding culture within the school.
- Provides strategic oversight on safeguarding implementation and effectiveness.
- Ensures that safeguarding policies are compliant and up to date.
- Works closely with the Designated Safeguarding Lead (DSL) to review, monitor and respond to trends, risks, and system gaps.
- Collaborates with the Head of School when needed.
- Advocates for appropriate resource allocation (budget, staffing, training).
- Receives and escalates safeguarding concerns involving senior leaders when appropriate.
- Reports to the Board on safeguarding matters at least annually.

Designated Safeguarding Lead (DSL) / Designated Child Protection Officer (DCPO)

The Designated Safeguarding Lead (DSL) also serves as the Designated Child Protection Officer (DCPO). The DSL/DCPO is a senior staff member responsible for overseeing safeguarding and child protection across the school.

The DSL/DCPO:

- Ensures policy implementation: Ensures the safeguarding and child protection across campuses.
- Serves as primary point of contact: Acts as the primary contact for safeguarding and child protection concerns across campuses.
- Provides guidance: Provides guidance and support to staff on identifying and reporting potential abuse or neglect.

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- Handles documentation and keeps records: Documents in writing with full confidentiality about the child’s input, relevant observations, and secure records regarding child protection issues without attempting to address the problem prematurely. The DSL/DCPO makes sure that all documentation and records are kept safe and treated with utmost confidentiality.
- Reports to leadership: Reports to the Head of School orally and in writing, as well as to the Designated Safeguarding Trustee in periodical meetings.
- Coordinates responses & external agencies: Coordinates responses and liaises with external child protection agencies in collaboration with the Head of School and in consultation with the Designated Safeguarding Trustee when needed, ensuring all communication is coordinated and compliant with school procedures.
- Manages risk & trends: Maintains the safeguarding risk register, coordinates mitigation actions, and detects and analyzes trends.
- Makes sure that child protection policies are known, understood, and followed by all stakeholders at school.
- Provides training & awareness: Offers regular training and support to faculty, staff (representatives), caregivers, and children, and facilitates training and awareness initiatives throughout the year.

Key Definitions

Term	Definition
Child	Any individual under 18 years of age (or older if enrolled as a Wellspring student).
Child Abuse & Neglect	All forms of physical, psychological/emotional, sexual ill-treatment, exploitation, or ongoing failure to provide basic needs (food, safety, medical care).
Imminent Risk	Severe, immediate threats to safety/development requiring urgent judicial intervention (Ministry of Justice / General Prosecutor).
Potential Risk	Threats affecting development that do not require immediate court measures, managed via Ministry of Social Affairs (MoSA) or specialized NGO (<i>himaya</i>).

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Term	Definition
Suspicion of Abuse	Any reasonable doubt or observation indicating abuse. Proof is not required to submit a report.

Roles & Incident Routing Matrix

Incident Type	First Contact / Receiver	Lead Authority	Operational Procedure
Student Misconduct & School Bullying	Supervisor / Teacher	Head of School (HOS)	Managed internally via Student Handbook & Disciplinary Code. DSL/DCPO informed for student support.
Cyberbullying / Abuse Outside School	Any Staff Member	Designated Child Protection Officer (DSL/DCPO)	Directly reported to DSL/DCPO. Risk assessed within 24 hours to determine judicial or NGO referral.
Allegation Against Wellspring Faculty or Staff	Any Staff Member → DCPO	HOS	DCPO transfers case to HOS immediately. Investigative Committee formed; staff suspended or reassigned during inquiry.
Family / Caregiver Abuse	Any Staff Member -> DCPO	DCPO & HOS with DST and possible legal counsel	DCPO assesses risk level. <i>Potential Risk:</i> Refer to NGO (<i>himaya</i>). HOS decides on action after consultation with DST and legal counsel when necessary. <i>Imminent Risk:</i> Mandatory referral to

Incident Type	First Contact / Receiver	Lead Authority	Operational Procedure
			Judicial Authority within 24 hours.

Incident Response Guidelines for Staff

When receiving a disclosure or noticing signs of harm:

- **DO:**
 - Find a private, quiet space.
 - Stay calm, listen attentively, and reassure the child they were right to speak up.
 - Explain that you must share the information with the DCPO to help keep them safe.
 - Report the incident immediately following the Wellspring Referral Pathway.
- **DO NOT:**
 - Express shock, disbelief, or anger.
 - Ask leading or investigative questions.
 - Promise absolute secrecy (confidentiality is maintained on a strict *need-to-know* basis and is dependent on the risk of harm).
 - Contact the child's parents independently.

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://d3n8a8pro7vhmx.cloudfront.net/clatest/pages/223/attachments/original/1427236373/InternallInvestigation.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 One - Wellspring Referral Pathway and Procedure

I. Receiving a Report

A report of abuse may be submitted to the Designated Child Protection Officer (DCPO) from various sources within the school. Confidentiality must be maintained by all involved parties throughout the process.

Consent: Where possible, incidents should be reported with the child's consent. However, in cases of imminent threat, child consent is not required.

This pathway applies to four main reporting scenarios:

1. **Disclosed External Abuse:** A child experiences abuse outside school grounds and reports it while at school.
2. **Suspected External Abuse:** A child experiences abuse outside school grounds and does not report it, but demonstrates unusual physical or behavioral signs of concern.
3. **Internal Abuse (Staff):** A child experiences abuse on school grounds involving a staff member.
4. **Internal Abuse (Peer):** A child experiences abuse on school grounds involving another child (peer, younger, or older).

II. Assess & Record

The primary objective of this stage is to establish the level of risk and document all relevant details for future reference.

- **Documentation:** The DCPO must record all available details using the standardized Child Protection Reporting Form (Reference: Appendix Eight).
- **Information Gathering:** When safe and appropriate, the DCPO may meet with the involved parties to gather further context. However, this may not always be necessary or possible, especially for incidents occurring outside school grounds involving external individuals. In many cases, a statement from the child is sufficient.
- **Consultation:** If needed, the DCPO should consult a qualified Child Protection (CP) organization prior to assessment to ensure the child's well-being is prioritized. In all cases, the DCPO should consult with the HOS and DST.

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- **Risk Categorization:** Based on the gathered information, the DCPO will assess the severity of the situation to classify the threat as either Potential Risk or Imminent Risk.

III. Respond

The action taken depends directly on the risk classification established during the assessment stage:

A. Potential Risk

- **External Referrals:** The DCPO must contact a CP organization to determine an appropriate response plan.
- **External Perpetrators:** If abuse occurs outside school grounds involving non-school individuals (e.g., caregivers, youth, external parties), the DCPO must not attempt an internal intervention. The case must be referred directly to a CP organization.
- **Unclear Cases:** If the DCPO is uncertain about the classification of an incident, they must consult a CP organization before recommending any school-level intervention.
- **Minor School Incidents:** Minor policy breaches will be handled according to standard school discipline procedures. However, if minor incidents recur or escalate, the DCPO must consult a CP organization.

B. Imminent Risk

- **Immediate Escalation:** When an assessment reveals immediate or urgent danger to the child, the DCPO must report the case to judicial authorities as soon as possible.

(Reference: Appendix Two)

Appendix Two - Defining Imminent and Potential Risk

I. Risk Assessment Framework

Determining the level of risk in a case of child abuse relies on a dynamic analysis of four core factors, as outlined in the *Standard Operating Procedures for Juvenile Protection in Lebanon*:

1. **The Nature & Circumstances of the Incident:** Severity, gravity, and recurrence of the reported facts.
2. **Child Vulnerability:** The child's age, personal traits, developmental stage, and specific vulnerabilities.

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3. **Protective Capacity of Caregivers:** The ability and willingness of parents or guardians to ensure the safety and healthy development of the child.
4. **Support Systems:** Available social, community, and organizational resources to assist the child and family.

II. School-Level Assessment Factors

While mandated social workers and juvenile courts conduct broader formal investigations, the Designated Child Protection Officer (DCPO) should focus on gathering information around seven specific key factors to evaluate risk within the school setting:

- **Type of Harm:** The nature of the abuse (physical, psychological, neglect, or sexual).
- **Severity of Harm:** The intensity and impact of the harm on the child.
- **Frequency & Duration:** How often the harm occurs and over what period.
- **Source of Harm:** Who is causing the harm (peer, staff member, family member, or external party).
- **Probability of Future Harm:** Likelihood that the harm will continue or escalate.
- **Child's Vulnerability:** Specific factors increasing the child's risk exposure.

(Reference: Appendix Six)

III. Assessing Risk Levels: Imminent vs. Potential

- **Potential Risk:** Incidents or indicators that present a concern but do not pose immediate life-threatening danger. **Note:** Minor incidents and potential risk situations must never be minimized or ignored, as unaddressed minor harm often escalates into critical threats over time.
- **Imminent Risk:** Situations involving severe, ongoing, or escalating violence, life-threatening harm, severe sexual abuse, or extreme exposure to danger requiring immediate protective intervention.

IV. Risk Indicators & Behavioral Signs

The table below provides a **non-exhaustive list** of indicators observed at school or reported from home across different types of abuse.

Type of Abuse	Observed / Reported at School	Reported or Originating from Home
Physical Abuse	• Violent conduct • Coercion by peers • Unexplained physical harm (bruises, wounds, burns, fractures, swelling)	• Corporal punishment • Coercion by family members • Unexplained physical harm (bruises, wounds, burns, fractures, swelling)
Psychological Abuse	• Intimidation or bullying • Suicidal ideation, self-harm, or unexplained scars	• Belittling, insulting, or humiliation • Rejection, defamation, isolation, or coercive control • Exposure to domestic violence and severe household conflict
Neglect	• Lack of basic care visible at school (unmet needs for food, water, weather-appropriate clothing, hygiene, healthcare, or school supplies)	• Caregivers are emotionally distant or unengaged • Child left unsupervised to self-care for inappropriate lengths of time • Living conditions pose active or potential physical danger
Sexual Abuse & Exploitation	• Exposure to or witnessing explicit content • Age-inappropriate sexualized behaviors with peers • Child subjected to sexual exploitation, forced sexual acts, or rape	• Inappropriate photographs/media taken by an adult • Sexual abuse or exploitation by a family member or household guest

Appendix Three - Required Recruitment Checks

Child protection requires that recruitment include the following essential procedures:

- HR personnel are fully briefed on the CPP.
- Background checks of the criminal record for the individual applying to any position within Wellspring are systematically carried out. Should a felon account or suspicion report show up in this background check, the related individual can no longer be considered for recruitment.
- At least two references are required (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).
- Attention is given to long or sudden gaps in the individual's working history, and questioning the reason behind the gap.
- A clear mention is made in advertisements that Wellspring abides by a Child Protection Policy and that all candidates will be expected to comply with Wellspring's CPP
- Successful candidates must accept and commit to the Child Protection Policy for working with children.
- A copy of or link to the CPP is given to all new faculty and staff to read and sign.

Appendix Four - Visitor and Volunteer Safeguarding Protocol

To maintain a secure environment and safeguard students, Wellspring Learning Community enforces strict entry and supervision procedures for all external visitors and volunteers.

1. Pre-Arrival Authorization & Verification

- **Written Notification:** Any organization sending a representative, volunteer, or contractor to deliver services on campus must provide prior written notification to Wellspring.
- **Identity Verification:** Upon arrival, all visitors must present official government-issued identification. Wellspring staff will verify their identity against the official written notification before granting entry.
- **Check-In / Check-Out:** Visitors must check in at the main security entrance upon arrival and check out before departing, in accordance with school access protocols.

2. Safeguarding & Supervision Requirements

- **Short-Term Visitors:** For brief visits, the visitor must be accompanied by a designated Wellspring staff member at all times to monitor activities and ensure school policies are strictly maintained.

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- **Long-Term / Frequent Visitors:** Individuals who will have prolonged or recurring interaction with students must complete a compulsory Wellspring Safeguarding & Child Protection **Training** prior to beginning their work on campus in addition to reading and signing the CPP.

3. Campus Access Controls

- **Restricted Access:** Visitors and volunteers are restricted exclusively to the specific areas of the campus required for their designated tasks or meetings. Unaccompanied access to general student areas is strictly prohibited.

Appendix Five: Contact Information of Relevant Organizations for 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 Six - Risk Assessment Factors & Framework

I. Purpose & Core Principles

The risk assessment framework provides a practical tool for the Designated Child Protection Officer (DCPO) to evaluate gathered information and categorize a situation as either **Imminent Risk** or **Potential Risk**.

- **Timely Intervention:** The primary goal of the assessment is to safeguard the child's well-being and determine necessary actions without delay.
- **Proportional Information:** It is **not required** to collect exhaustive data across all seven factors before acting. Gather as much information as reasonably possible; if the safety of the child requires rapid escalation, prioritize immediate action over complete data gathering.
- **Dynamic Process:** Risk is not static; it represents a snapshot in time. A situation categorized as "Potential Risk" may escalate. Continuous monitoring is required for any child who remains in the school environment without external referral.

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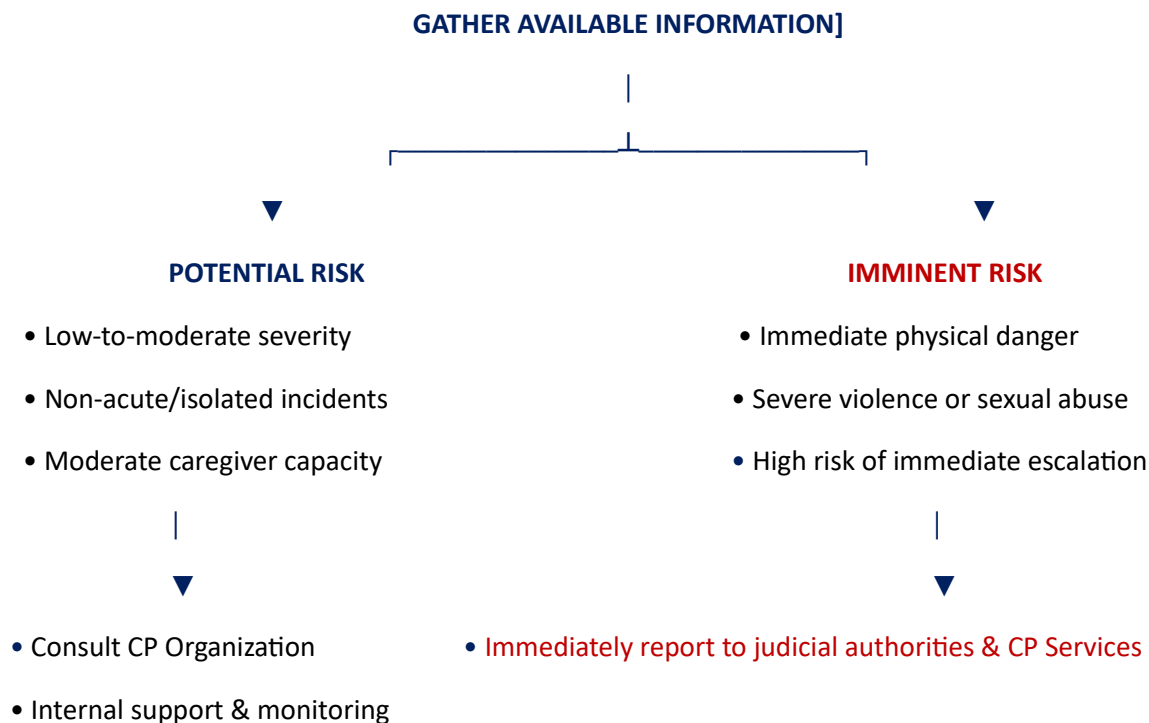
- **Consultation Rule:** Whenever the DCPO is uncertain about the risk classification or appropriate action, they must consult a specialized Child Protection (CP) organization.

II. The 7 Assessment Factors

When reviewing a case, the DCPO should analyze the situation across the following seven key dimensions:

Factor	Key Considerations & Evaluation Criteria
1. Frequency of Harm	• Total number of reported incidents over a specific timeframe. • Evidence of recurring patterns or chronic behavior. • Historical concerns, prior warnings, or documented past incidents.
2. Type of Harm	• Classification of primary abuse: Physical, Psychological, Sexual, or Neglect (a child may experience multiple types simultaneously). • Exposure to secondary forms of violence (e.g., witnessing domestic violence, inter-parental conflict, or community violence).
3. Severity of Harm	• Immediate physical or psychological impact on the child. • Likelihood of the incident causing short-term or long-term injury/trauma. • Observable manifestations or disruption within the school environment.
4. Source of Harm	• Relationship and power dynamic between the child and the alleged perpetrator (e.g., staff member, peer, parent, caregiver, or external adult). • Degree of access and proximity the perpetrator has to the child.
5. Duration of Harm	• The timeframe over which the abuse or neglect has occurred. • Cumulative effects of prolonged exposure to harm on the child's safety and development.
6. Probability of Escalation	• Assessment of the likelihood that harm will recur or intensify if no intervention occurs. • Presence or absence of protective factors mitigating future risk.
7. Child Vulnerability	• Individual factors that increase susceptibility to harm: younger age, physical or intellectual disabilities, medical conditions, language barriers, or social isolation.

III. Risk Decision Matrix



Appendix Seven - Law 422/2002

Below is a summary of Law 422/2002 on the Protection of Juveniles in Conflict with the Law and/or at Risk in English in addition to 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

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:

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

Who can report?

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

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

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 led her/him to think that a juvenile may be at risk to:

- Report such matters to the judicial authorities
- Inform the Ministry of Social Affairs MOSA
- Inform non-governmental organizations NGO (ex: himaya)

Any person who informs/reports can remain anonymous with the understanding that professional secrecy is lifted when reporting (art. 26, law 422/2002)

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

Original Arabic text of Articles 25 and 26 from the Lebanese Law No. 422/2002 (Protection of Minors in Conflict with the Law or At Risk)

المادة 25

يُعتبر الحدث مهدداً في الأحوال الآتية

1. إذا وجد في بيئة تعرضه للاستغلال أو تهدد صحته أو سلامته أو أخلاقه أو ظروف تربيته.

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2. إذا تعرض لاعتداء جنسي أو عنف جسدي يتجاوز حدود ما يبيحه العرف من ضروب التأديب غير المؤذي.

3. إذا وجد متسولاً أو مفرداً (متشرداً).

يُعتبر الحدث متسولاً في إطار هذا القانون إذا امتنن استجداء الإحسان بأي وسيلة كانت. ويُعتبر متشرداً إذا ترك مسكنه ليعيش في الشوارع والمحلات العامة أو لم يكن له مسكن ووجد في الحالة الموصوفة آنفاً

المادة 26

للقاضي، في أي من هذه الأحوال، أن يتخذ لصالح الحدث المذكور تدابير الحماية أو الحرية المراقبة أو الإصلاح عند الاقتضاء.

يتدخل القاضي في هذه الأحوال بناءً على شكوى الحدث أو أحد والديه أو أوليائه أو أوصيائه أو الأشخاص المسؤولين عنه أو المندوب الاجتماعي أو النيابة العامة أو بناءً على إخبار. وعليه التدخل تلقائياً في الحالات التي تستدعي العجلة. على النيابة العامة أو قاضي الأحداث أن يأمر بإجراء تحقيق اجتماعي وأن يستمع إلى الحدث...والديه أو أحدهما أو الوصي الشرعي أو الأشخاص المسؤولين عنه، وذلك قبل اتخاذ أي تدبير بحقه، ما لم يكن هناك عجلة في الأمر فيكون ممكناً اتخاذ التدبير الملائم قبل استكمال الإجراءات السالف ذكرها. ويمكن الاستعانة بالضابطة العدلية لتقصي المعلومات في الموضوع

لا يُعتبر إفشاءً لسر المهنة ولا يقع تحت طائلة أحكام قانون العقوبات أي إخبار يُقدّم إلى المرجع الصالح ممن هو مطلع بحكم وضعه أو وظيفته أو فنه على ظروف الحدث المعرض للخطر في الأحوال المحددة في المادة 25 من هذا القانون

المادة 27

يبقى الحدث قدر المستطاع في بيئته الطبيعية، على أن يُعيّن القاضي بعد الاستماع إلى الوالدين أو أحدهما شخصاً أو مؤسسة اجتماعية للمراقبة وإسداء النصيحة والمشورة للأهل والأولياء ومساعدتهم في تربيته، وعلى أن يقدم هذا الشخص أو المؤسسة للقاضي تقريراً دورياً بتطور حالته. وللقاضي، إذا قرر إبقاء الحدث في بيئته، أن يفرض عليه وعلى المسؤولين عنه موجبات محددة، كأن يدخل المدرسة أو مؤسسة اجتماعية أو صحية متخصصة أو أن يقوم بعمل مهني ما.

للقاضي فرض التدابير المنوّه عنها أعلاه في حال خروج الحدث على سلطة أهله وأوليائه واعتياده سوء السلوك الذي يعرضه للمخاطر السابق ذكرها، وذلك بناءً على شكوى هؤلاء أو طلب المندوب الاجتماعي.

Appendix Eight - Reporting Form - DCPO

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 No.
Father			
Mother			
Sibling			
Sibling			
Sibling			
Other			
Other			
DCPO 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:** _____

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Appendix Nine - Confidentiality and Data Protection Protocol

Maintaining strict confidentiality and data security is paramount in child protection. All personal data, case details, and records concerning students must be handled with maximum security and shared strictly on a **need-to-know basis**.

I. Principles of Confidentiality & Child Rights

- **Ownership of Information:** Personal information disclosed by a child remains their own. As a standard principle, information should only be shared with the child's informed consent.
- **Overriding Consent (Imminent/High Risk):** Information may be shared without or against the child's consent **only when necessary to protect them from significant harm** (e.g., severe or high-risk cases requiring referral to Child Protection organizations or judicial authorities). The reasons for overriding consent must always be explained to the child in an age-appropriate manner.
- **Child Input on Disclosure:** Children must be given the opportunity to identify specific details they feel uncomfortable sharing with certain individuals. These requests should be honored unless doing so compromises their safety.
- **Right of Access:** A child (and/or their legal guardian, where safe and legally appropriate) maintains the right to review written information held about them.
- **Strict Recipient Targeting:** Information must be delivered solely to the designated recipient and never left accessible to unauthorized personnel.
- **Need-to-Know Standard:** Access to sensitive information is strictly restricted to personnel whose direct involvement is essential to ensure the child's safety and well-being.

II. Physical (Paper) Records Security

- **Anonymized File Labeling:** Paper files must never display the child's full name on the exterior cover. Files must be labeled using a pseudonymous coding convention:

(Campus Location) – (Child's Initials) + (Date of Birth -DDMMYY). *Examples:* Mathaf – RL130617 or City Centre – AS150217

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- **Secure Physical Storage:** All paper files must be stored in a locked cabinet located inside a secure room with restricted access.
- **Room Access Control:** The room containing physical records must remain locked at all times when the responsible officer (DCPO) is not present inside.

III. Digital File & Computer Security

- **Workstation Protection:** Any computer storing child protection records must be password-protected and located in an office with controlled, limited access.
- **System Security:** Computers used for case handling must run up-to-date operating systems and active anti-virus/malware software.
- **File Naming & Concealment:**
 - File names must follow the standard pseudonymous coding format (Campus - Initials + DDMMYY) and must **never** include the child's name unless the file is fully encrypted.
 - Electronic records must be stored within a dedicated, non-public folder hierarchy (not left directly on the desktop).
- **Document Encryption:** All digital files containing sensitive case details must be encrypted and password-protected (e.g., using Microsoft Word password encryption).
- **Password Management:** File encryption passwords must be stored securely (e.g., via the DCPO's secure, password-protected email account or a dedicated password manager), referencing only the pseudonymous file code.

IV. Summary Checklist for DCPO Record Management

Area	Security Requirement	Status
Identification	Child's full name removed from file covers, email subjects, and unencrypted filenames	[]
Coding System	File labeled as [Location] - [Initials][DDMMYY]	[]

Physical Storage	Stored in locked cabinet inside locked office	[]
Digital Encryption	Document encrypted with individual password; PC password-protected	[]

Appendix Ten - Information and Guidelines for the School Nurse

I. Role & Communication Pathway

The Designated Child Protection Officer (DCPO) must share these foundational guidelines with the school nurse. When potential child abuse or neglect is observed during clinical assessments, the nurse follows the established referral pathway by immediately notifying the DCPO.

II. Legal Protection and Reporting Obligations

Nurses are protected under Lebanese law when reporting suspected child endangerment:

- **Professional Secrecy Exemption (Art. 26, Law 422/2002):** Professional confidentiality is legally lifted when reporting cases of child endangerment. Disclosing information to the appropriate authority does not constitute a breach of medical secrecy.
- **Whistleblower Anonymity (Law 422/2002):** Any individual reporting child abuse or neglect has the right to remain anonymous.
- **Duty of Assistance (Art. 567, Penal Code):** Failure to render assistance to a person in physical danger or failure to notify competent authorities carries legal penalties.

III. Clinical Presentation and Indicators

1. Physical & Behavioral Indicators

The table below categorizes potential clinical presentations across abuse types:

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Category	Clinical Observations & Physical Signs	Behavioral & Emotional Indicators
Physical Abuse & Neglect	• Recurrent unexplained bruises, fractures, or soft tissue injuries. • Unexplained or patterned burns (e.g., cigarette, iron, rope burns). • Infected or untreated wounds/injuries. • Delays in seeking medical care for obvious injuries. • Poor hygiene, unwashed clothing, or severe unmet healthcare needs.	• Fear of returning home or leaving campus. • Expressions of social isolation or lack of a caregiver. • Chronic anxiety, withdrawal, or depressive mood.
Sexual Abuse & Exploitation	• Pain, swelling, or irritation in the genital/anal area. • Unexplained bruising or bleeding in genital/anal regions. • History of recurrent, unexplained psychosomatic symptoms (e.g., severe abdominal pain, headaches).	• Age-inappropriate sexual knowledge or explicit behavior. • Sudden onset of bedwetting (enuresis) or severe sleep disturbances/nightmares.

Note: Isolated general indicators (e.g., occasional headaches or mild anxiety) may not indicate abuse on their own. Nurses must evaluate indicators within the broader context of frequency, physical patterns, and behavioral changes.

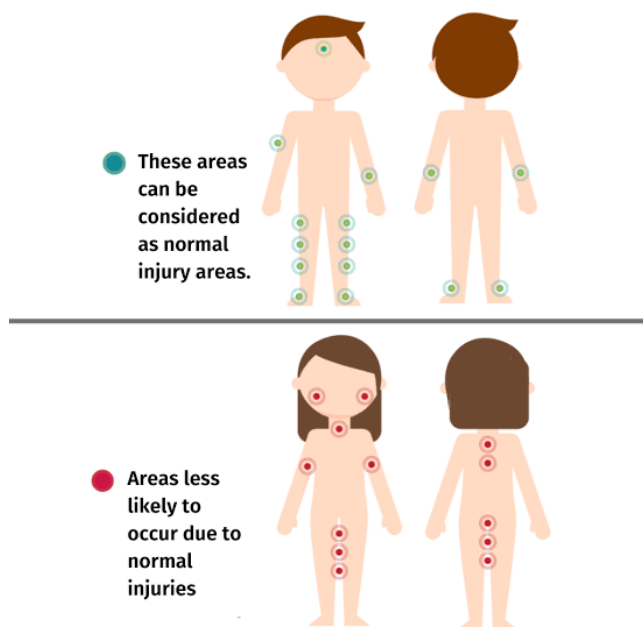
2. Physical Examination Reference: Injury Mapping

When examining physical injuries, nurses should distinguish between common accidental locations (e.g., bony prominences like knees, shins, elbows) and non-accidental impact zones.

IV. Communication and Child-Friendly Interaction

When interacting with a student suspected of experiencing abuse:

1. **Maintain Sensitivity & Respect Boundaries:** Do not force the child to recount traumatizing events or push for details beyond basic medical evaluation.
2. **Reassure the Child:** Affirmatively state that the child has a right to be safe, is not to blame for what happened, and showed bravery by seeking help.
3. **Normalize Protection:** Explain that abuse is wrong and abnormal, and that steps will be taken to help them stay safe.
4. **Transparent Next Steps:** Inform the child gently that the DCPO will be notified to ensure they receive the necessary support and protection.



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Appendix Eleven - General Guidelines for Internal Personnel Investigations

Disclaimer: This document provides general operational guidance for conducting internal personnel investigations within the school. It serves as an internal framework and does not replace specialized legal advice or professional investigative training.

I. Overview & Purpose

1. Scope of Internal Investigations

An internal investigation is initiated when credible information indicates significant wrongdoing, misconduct, or ethical lapses concerning a student or child protection standard. Investigations may arise from allegations submitted by faculty, staff, parents, or students regarding violations of:

- Professional standards or codes of ethics
- School child protection policies
- Statutory laws or administrative regulations

2. Core Objective

An investigation is a fact-finding exercise designed to gather relevant, accurate information to determine the validity of an allegation and inform the administration's response.

- **Equitable Principles:** Investigations must be conducted rapidly, fairly, transparently, and consistently: protecting the child's safety while respecting the due process rights of the accused staff member.
- **Timeliness:** Completing investigations promptly clears innocent individuals without unnecessary delay and prevents further misconduct.

3. Threshold for Criminal Referral (Immediate Cessation)

If an allegation involves criminal conduct (e.g., possession or production of child abuse material, online grooming, severe sexual assault, or illicit drug distribution), the school must immediately notify national law enforcement and judicial authorities.

Rule: Wellspring will **not** conduct or continue an internal investigation once a criminal threshold is met, so as not to compromise external law enforcement proceedings.

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II. The Internal Investigation Committee

When an allegation warrants formal inquiry, an Internal Investigation Committee convenes to examine facts and recommend appropriate actions.

1. Committee Composition & Structure

To maintain efficiency, confidentiality, and coordination, the committee should remain small (3 to 5 core members). Potential predefined roles include:

- Head of School (HOS) / Principal
- Designated Child Protection Officer (DCPO)
- Designated Safeguarding Trustee (DST)
- Legal Counselor
- HR Officer
- Representative from the Faculty/Staff Committee

2. Lead Investigating Officer

A Lead Investigating Officer (the DCPO unless otherwise determined) must be appointed to direct the committee, coordinate evidence collection, and ensure adherence to fair process.

3. Responsibilities & Code of Conduct

All committee members must sign a formal Terms of Reference (ToR) prior to the investigation, committing to:

- **Conflict Identification:** Disclose and eliminate any personal bias or direct involvement in the matter.
- **Strict Confidentiality:** Refuse off-the-record conversations and limit information strictly to authorized personnel.
- **Proportionality:** Focus solely on relevant facts and avoid investigating unnecessary personal background.
- **Objective Documentation:** Maintain clear, contemporaneous records of all procedural steps, interviews, and decisions.

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III. The 6-Step Investigation Process

Step 1: Preparation

Identify the Lead Investigating Officer, define the exact scope of the allegations, establish a secure timeline, and outline required witness interviews.

Step 2: Evidence Gathering & Pre-Assessment

- **Evidence Retrieval:** Secure physical and digital evidence (CCTV footage, visitor logs, digital messaging, photographs, initial reporting forms).
- **Threat Assessment & Risk Mitigation:** Conduct an immediate safety assessment to determine ongoing risk:
 - *High Risk / Active Threat:* If the accused poses a potential risk to students or staff, the Head of School may issue a **temporary reassignment or administrative suspension** pending investigation findings.
 - *Low Risk / Historical Allegation:* If no active risk exists, protective separation measures may be adjusted accordingly.

Step 3: Conducting Interviews

Interviews must adhere to a strict "**Do No Harm**" standard in a neutral, non-intimidating venue.

A. General Interview Protocols

- Conduct individual, face-to-face meetings as soon as reasonably possible.
- Explicitly state the purpose of the meeting and emphasize strict confidentiality requirements.
- Prohibit aggressive or coercive interrogation techniques; encourage transparent disclosure.
- Provide clear post-interview expectations and next steps to the interviewee.

B. Specific Rules for Student Interviews

- **Parental Notification & Consent:** Parents must be notified of allegations involving their child and provide consent prior to student interviews.

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- **Support Personnel:** A school counselor, psychologist, or social worker must be present during student interviews to provide emotional support and conduct debriefing.
- **Age-Based Accommodations:**
 - **Students under 15 years old:** Parents/guardians **must be present** inside the interview room.
 - **Students 15 years and older:** Parents may escort the student to the venue, but the student may be interviewed individually with the designated support counselor present.
- **Facing the Accused:** Students are **never** required to face the accused staff member directly without prior psychological briefing, risk assessment, and professional support.

C. Questioning Technique

Questions must remain open-ended, objective, and non-leading:

Effective Open-Ended Questions	Questions to Avoid
• "Can you describe what occurred?" • "Where and when did this take place?" • "Who else was present or nearby?" • "Was this an isolated event or has it happened before?"	• <i>Leading questions that assume guilt or suggest specific answers.</i> • <i>Coercive or judgmental phrasing.</i>

Step 4: Evaluating Evidence and Credibility

Assess the collected material based on:

- Integrity and chain of custody of digital/physical evidence.

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- Internal consistency of witness statements.
- Degree of independent corroboration across multiple sources.

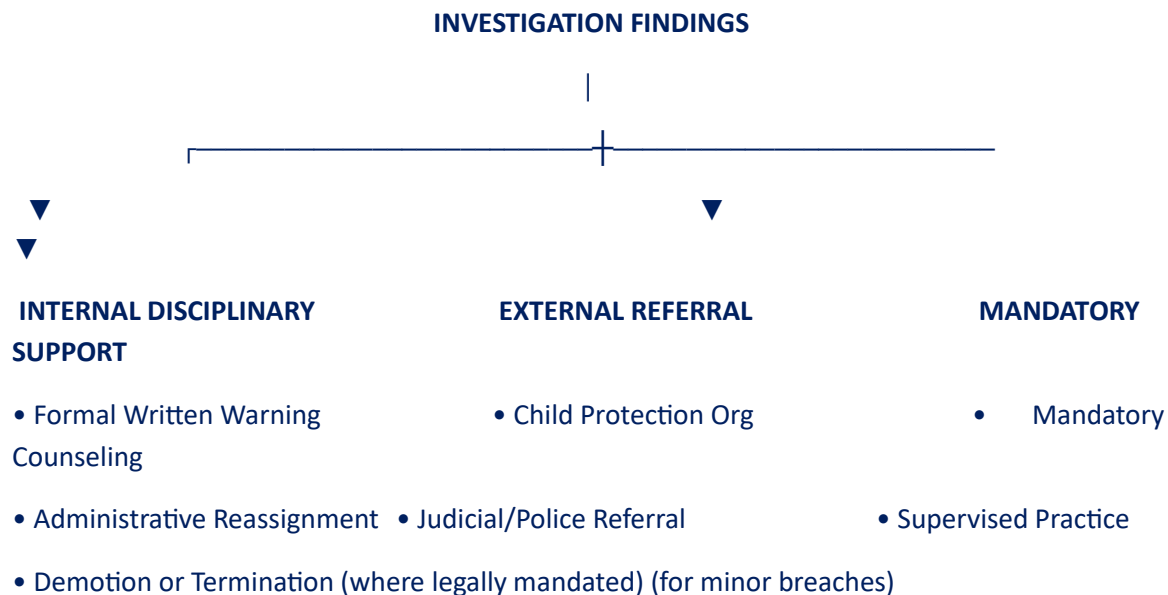
Step 5: Investigative Report

Upon completion, the committee drafts a comprehensive final report containing:

1. Context and background of the complaint.
2. Procedural steps followed and timeline.
3. Summary of evidence and interview transcripts.
4. Objective analysis of facts.
5. Formal conclusions regarding policy/ethical breaches.

Step 6: Determining Response & Disciplinary Actions

If the allegation is substantiated, the Head of School and Board determine proportionate administrative actions:



IV. Critical Operational Considerations

1. Confidentiality and Data Security

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- **Non-Disclosure Requirement:** All aspects of an active investigation (subject identity, collected evidence, witness statements, and findings) are strictly confidential. Breaches of confidentiality by staff or participants are subject to separate disciplinary action.
- **Storage Protocol:** Digital files must be saved in password-protected directories on secure systems. Physical files must be locked in designated file cabinets with access restricted solely to the DCPO and Head of School.

2. Support for Subject of Investigation

To ensure due process and minimize distress, the accused individual must be:

- Informed of concerns or allegations as early as procedurally appropriate.
- Provided a clear explanation of the investigative steps and confidentiality measures.

3. Protection Against Retaliation (Whistleblower Protection)

Reporters, witnesses, and cooperating individuals are strictly protected from administrative or personal retaliation. Any retaliatory action by staff results in immediate disciplinary review.

4. Handling False Allegations

- **Student Reporting:** If a student makes an unsubstantiated or false disclosure, the school must evaluate whether underlying distress or external factors require psychological support or external referral. Malicious false claims will be managed under the school's student disciplinary framework.
- **Staff Reporting:** Malicious false allegations made by a staff member against a colleague constitute severe misconduct and will be processed under staff disciplinary procedures.

5. External Communications & Crisis Media

- **Parental Communication:** Parents of involved students must be informed promptly regarding the scope of the inquiry, measures taken to ensure student safety, and the final outcome (maintaining privacy boundaries).
- **Public/Community Statements:** External statements must be coordinated with legal counsel. Statements should summarize general facts without releasing personal identities, re-emphasize student safety, and outline the school's adherence to child protection standards.

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V. Reference Resources & External Frameworks

- **ACAS (UK):** *Conducting Workplace Investigations Guidelines*
- **ICMEC:** *International Center for Missing & Exploited Children — Incident Response Standards*
- **Royal Commission into Institutional Responses to Child Sexual Abuse:** *Employee Misconduct & Investigation Processes Guide*

Appendix Twelve - Virtual Learning, Online Safeguarding and Recording Consent

I. Purpose and Policy Framework

Virtual learning provides an essential alternative instructional model for Wellspring Learning Community. While digital platforms offer valuable educational opportunities, extended internet use exposes students to risks such as cyberbullying, privacy violations, grooming, exposure to inappropriate content, and digital exploitation.

Safeguarding students in a digital environment requires a coordinated effort between the school administration, staff, parents, and students.

II. Administrative & Staff Safeguarding Duties

1. Administrative Oversight

- **Training & Guidance:** The Designated Child Protection Officer (DCPO) educates and supports teaching staff on virtual safeguarding protocols.
- **Incident Monitoring:** The administration actively supports the DCPO during investigations or monitoring of online harm.
- **Storage Security:** All educational recordings, video files, and student media uploads must be stored on password-protected, encrypted systems accessible only to authorized personnel.

2. Staff Conduct and Operational Rules

Faculty and staff participating in virtual instruction must adhere strictly to the following standards:

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- **Approved Platforms:** Conduct all virtual lessons and student communications exclusively through school-authorized applications during scheduled timetable hours.
- **Professional Environment and Attire:** Teach from a professional, appropriate neutral setting and adhere strictly to the Wellspring staff dress code during video sessions.
- **Data Privacy:** Maintain student confidentiality. Never share student personal information or contact details with external or internal parties, except the Principal, Head of School (HOS), and DCPO.
- **Informed Recording Protocol:** Never record audio or video during a live session without prior annual written parental consent. Always give a clear verbal announcement to students before starting any recording.
- **Appropriate Media Requests:** Obtain written permission before asking students to submit personal photographs or videos as proof of learning.
- **Mandatory Reporting:** Report any online safety concerns, cyberbullying indicators, or disclosure of harm immediately to the DCPO.

III. Parent and Caregiver Responsibilities

Parents and guardians play a vital role in supervising student internet use at home by:

- **Environment & Schedule:** Providing a quiet, supervised space for online learning and establishing clear boundaries balancing academic screen time and leisure.
- **Data Protection:** Reinforcing that students must never publicly share passwords, home addresses, personal photos, or sensitive data on social platforms.
- **Access Control:** Implementing parental control services, content filters, and website restrictions to block inappropriate or adult material.
- **Healthy Balance:** Encouraging screen breaks, physical activity, and regular meals during virtual learning periods.
- **Prompt Communication:** Reporting any online safety concerns or suspected internet risks immediately to the school DCPO.

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IV. Student Guidelines and Cyber-Safety Rules

1. Core Digital Rules

- **Account Privacy:** Never share personal passwords with anyone other than parents or legal guardians.
- **Strict Privacy Controls:** Decline friend/contact requests from strangers and keep social media accounts set to maximum privacy settings.
- **Parental Permission:** Treat the internet as a physical space: obtain parent permission before visiting new websites, creating accounts, or downloading applications.

2. Specific Online Safety Instructions

- **Gaming Cautions:** Avoid online multiplayer games with open text/voice chat with strangers, or play in offline modes.
- **The "Five-Click Rule":** Avoid unstructured browsing. Limit navigation to a maximum of 5 clicks away from the approved home/resource page to prevent accidental exposure to inappropriate content.
- **Ad and Link Safety:** Never click on pop-up ads, promotional banners, or unsolicited links offering prizes, free items, or downloads, as they often contain malware or phishing schemes.
- **Suspicious Messaging:** Do not open email attachments or click links from unknown senders.
- **Reporting Unsafe Situations:** If an online conversation, image, or message feels uncomfortable, threatening, or strange, immediately notify a parent, teacher, or the DCPO.

V. Recording Protocols & Formal Consent Forms

Educational session recordings are used solely for instructional support and academic review. Video and audio recordings will **never** be published publicly. Unauthorized recording or misuse of student media by staff constitutes severe misconduct.

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VI. Consent Forms

Parent / Legal Guardian Consent Form

I, Mr./Mrs./Ms. _____, guardian of student _____, confirm that I have read and understood the Wellspring Virtual Learning Safeguarding Policy.

I hereby grant permission to Wellspring Learning Community to record live virtual educational sessions involving my child for academic purposes, in accordance with the safeguards outlined above.

- **Parent / Guardian Name:** _____
- **Signature:** _____
- **Date:** _____

Student Assent Form (English)

I, _____, have reviewed this document with my family and understand the rules for online safety. I agree to have my educational sessions recorded when necessary for learning purposes.

- **Student Name:** _____
- **Signature:** _____
- **Date:** _____

Appendix Thirteen - Disciplinary Procedures for Personnel Code of Conduct Breaches

I. General Policy Statement

Wellspring Learning Community maintains a **zero-tolerance policy** for child abuse, neglect, exploitation, or boundary violations of any kind.

Any staff member suspected of committing abuse or violating student safeguarding policies will be subject to immediate administrative review, internal investigation, potential referral to judicial authorities under Lebanese law, and disciplinary action up to immediate termination of employment.

All reports of abuse are investigated promptly, impartially, and with the highest achievable level of confidentiality.

II. Investigative Process and Interim Measures

1. **Mandatory Reporting:** Any employee who observes, suspects, or receives a disclosure of child abuse must report it immediately to the DCPO or Head of School.
2. **Precautionary Suspension:** Pending the outcome of an internal investigation or law enforcement inquiry, Wellspring reserves the right to place the accused staff member on administrative suspension (with or without pay) to ensure student safety and protect the integrity of the investigation.

III. Disciplinary Measures Framework

If an investigation substantiates a violation of the Safeguarding Policy or Code of Conduct, Wellspring may impose administrative and disciplinary sanctions proportional to the severity of the offense and in accordance with the **Lebanese Labor Law** (Law 422/2002).

Progressive Disciplinary Actions:

1. **Formal Written Warning:** Issued for minor boundary oversights or administrative compliance failures.
2. **Salary Deduction:** Deductions applied in accordance with statutory maximums (not exceeding 10 days' pay per academic year).

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3. **Deferral of Pay Progression:** Delaying salary scale increases or promotions for a period of up to two (2) years.
4. **Suspension with Pay:** Temporary removal during active inquiries.
5. **Suspension Without Pay:** Disciplinary suspension following established policy breaches.
6. **Summary Dismissal / Termination of Contract:** Immediate termination of employment without severance pay or material compensation in cases of gross misconduct, child abuse, or statutory violations.
7. **Judicial Referral:** Reporting the matter directly to the Public Prosecutor, Juvenile Court, or appropriate law enforcement agency pursuant to Lebanese Law No. 422/2002 and Penal Code provisions.