

# BESGB Child Protection Policy

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# Definitions

## **Child**

For the purposes 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 BESGB.

## **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**

Exposing a child to sexual content or engaging them in sexual acts, usually by an adult or an older child with power or control over the victim. Sexual exploitation is defined as a subtype of sexual abuse as per national guidelines.

## **Child Psychological Abuse**

Injury to the psychological capacity or emotional stability of the child as evidenced by an observable change in behaviour, emotional response, or cognition.

## **Child Neglect**

The failure of a caregiver – regardless of resources and income - to provide needed food, clothing, shelter, medical care, education, emotional support or supervision to the degree that the child's health, safety, and well-being are threatened with harm.

## **Suspicion of child abuse**

A suspicion of child abuse can be event(s) or sign(s) that suggest a child is facing abuse (Appendix 2).

## **Inappropriate behavior of children towards other children**

This encompasses any inappropriate behaviors or misconduct that negatively affect children and result in disciplinary sanctions. Bullying has been highlighted in the definition below as it is a common form.

**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

**BESGB aims to create a child safe environment where children feel respected, empowered and involved in their own protection, and where staff are confident, competent and well supported in meeting protection-related responsibilities.**

## 2. Purpose of the policy

This document will provide a rationale for a child protection policy and will describe the main components of a CPP that will be implemented in BESGB. The CPP will describe guidelines and procedures for:

- Creating a child-friendly environment
- Raising awareness on child wellbeing
- Communicating and behaving with children
- Detecting signs of child abuse and referring
- Implementing management procedures and structures for policy implementation (i.e. the CPG, CPO and recruitment checks)
- Responding to policy violations with consequences
- Recruiting and training of staff

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

## 3. Policy Scope

All students registered at BESGB 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 signs of violence detected on a child will be acted upon according to the outlined procedures to safeguard the wellbeing of the student.

## 4. Introduction

The main aim of a child protection policy is to develop a child safe environment where children can develop in a healthy way and reach their maximum potentials. This policy will clarify expected behaviours, outline legal obligations and encourage protective practices. To create an effective policy, BESGB has established a partnership with himaya to collaborate in the development, adoption and implementation of this policy.

### a) Policy Development

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 recognises, 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 BESGB 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. BESGB is adhering to Ministry of Social Affairs (MoSA) recommendations to implement a child protection policy that protects children and promotes their wellbeing.

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

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<sup>1</sup> Focus Group Discussions were held in March of 2018

## 5. Ethos

### a) Child Protection Issues

Child protection activities target a range of potential issues that can affect the physical and mental health of students. The four main 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 (cyberbullying, peer to peer bullying, racist and homophobic abuse), exposure to domestic violence, child labour and child sexual 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 potential 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. Corporal punishment is using physical punishment to discipline a child with a prominent example being spanking. Abuse is differentiated by the frequency of violence, severity of violence, the age of the child and other factors contributing to their vulnerability (Appendix 2).

### b) BESGB values reflected in Child Protection

BESGB fully believes in the responsibility of academic institutions in ensuring child safety and supporting child development in the community. The policy reflects the values adopted by BESGB which are: *Excellence, Honesty & Trust, Fairness & Respect, Teamwork and Diversity*.

- **Excellence:**

A child protection policy aims to promote child friendly environments for healthy child development which is a prerequisite for excellence in academics and personal development. Community-based activities, awareness sessions and communication and behaviour guidelines are some of the components that will be used to develop a child friendly environment. Early detection and referral is an integral

part in reducing the consequences of child abuse on children through providing psycho-social support to children and families via specialized organizations.

- **Honesty & Trust:**

Publishing the CPP and its procedures will show BESGB's commitment towards ensuring the wellbeing of its students and transparency in responding to allegations as well as detection and referral of child abuse. As detection and referral is the most sensitive component, the administration will take any breaches of privacy and confidentiality very seriously. The primary goal of the CPP is to benefit children and protect their wellbeing which all community members will be working for.

- **Fairness & Respect:**

Fairness and respect are reflected in BESGB's adherence to international treaties and national law through the CPP components. Since students are the primary target of this policy they will have a voice in shaping the procedures and proceedings through the child protection group (CPG).

- **Teamwork:**

BESGB believes that protecting children from harm is the collective responsibility of all community members including students, parents, teachers as well as community agencies and community professionals.

Co-operation among community members can ensure the effective implementation of this policy and promote a safer environment via activities and programs implemented throughout the academic year.

- **Diversity:**

BESGB believes in strength in diversity where there is tolerance and acceptance of others. These ideas will be transmitted through the involvement of multiple stakeholders in the child protection policy development and implementation.



## 6. CP Structure and Responsibilities

### a) Child Protection Officer (CPO)

The **Child Protection Officer** (CPO) is the assigned officer responsible for handling all witnessed or suspected cases of harm against a child within BESGB.

#### Selection:

The Principal will shortlist nominees to the CPG for the position of CPO where a majority should approve the selection. In the absence of the CPO, the principal can assign a suitable CPO in accordance with the recruitment requirements in appendix 5.

#### Responsibilities

The CPO's responsibilities are as follows:

- Know about the signs and symptoms of child abuse
- Understand and apply BESGB's internal referral pathway (Appendix 1) which includes taking the necessary reporting and informing procedures.<sup>2</sup>
- Document reports of potential risk and immediate risk to children as appropriate using the assigned 'Reporting form' (CPO toolkit Appendix 9).
- Apply confidentiality and data protection procedures as outlined including password protecting soft copies and storing hard copies in a secure cabinet in a locked room (CPO Appendix 10)
- Ensure that the wishes and feelings of children are respected, especially before any measures are taken, to ensure their protection
- Consult with child protection experts about reports, cases and potential interventions before acting
- Respect, and promote respect, of confidentiality and privacy of students

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<sup>2</sup> In accordance with the Standard Operational Procedures (SOP) under the law 422/2002 and legal referral pathway (provided in the CPO toolkit Appendix 8).

## **b) 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.

### Selection:

To ensure that all community members are represented, the CPG will include: the Principal, Head of Section(s) (HoS), the Child Protection Officer (CPO), Parent representative(s), teacher representative(s), and student representative(s). Each of the student, teacher, and parent associations will assign candidates.

The CPG acts as a committee therefore roles will be assigned at the beginning of the year through group approval. These roles may include: Chair, Co-chair and Secretary. It is recommend for the CPO to be the Chair or Co-chair and that note-taking is rotated between members. The Chair and Co-chair should be the most well-informed of the organization's activities and lead organized, constructive meetings to ensure that the committee is accomplishing its goals. The secretary should tend to the logistics of meetings (time, place, etc.) and organize minutes of meetings along with any relevant correspondence.

### Responsibilities:

The CPG's responsibilities are the following:

#### **Monitoring & Evaluation:**

- Ensuring that all terms of the CPP, within BESGB's jurisdiction, are respected and applied by all community members.
- Ensuring that there is an active CPO throughout the academic year and nominating a replacement when needed.
- Overseeing the completion of the required annual training by all teachers, staff, students and CPG members annually.

#### **Implementation & Communication:**

- Assigning the CPO yearly based on majority approval.
- Creating subcommittees to suggest and apply potential solutions for identified priority issues.
- Implementing activities throughout the academic year that promote the CPP or, promote a theme related to child development or child protection.

- Communicating community members' needs to himaya or other relevant organizations for action.

**Development:**

- Continually improving and clarifying relevant policies and procedures
- Identifying concerns or factors negatively affecting the wellbeing of students in BESGB.
- Reviewing and revising the policy and its procedures annually.

The Principal, Head of Sections and CPO will be primarily responsible for the development and improvement of school policies and procedures relating to the CPP.

Frequency of meetings:

The minimum frequency of CPG meetings is once per month, or more as deemed needed by the members, at which minutes of meeting should be taken and shared with the members of the CPG.

**Confirmed or potential child abuse cases should never be discussed in the CPG.**

**c) Staff**

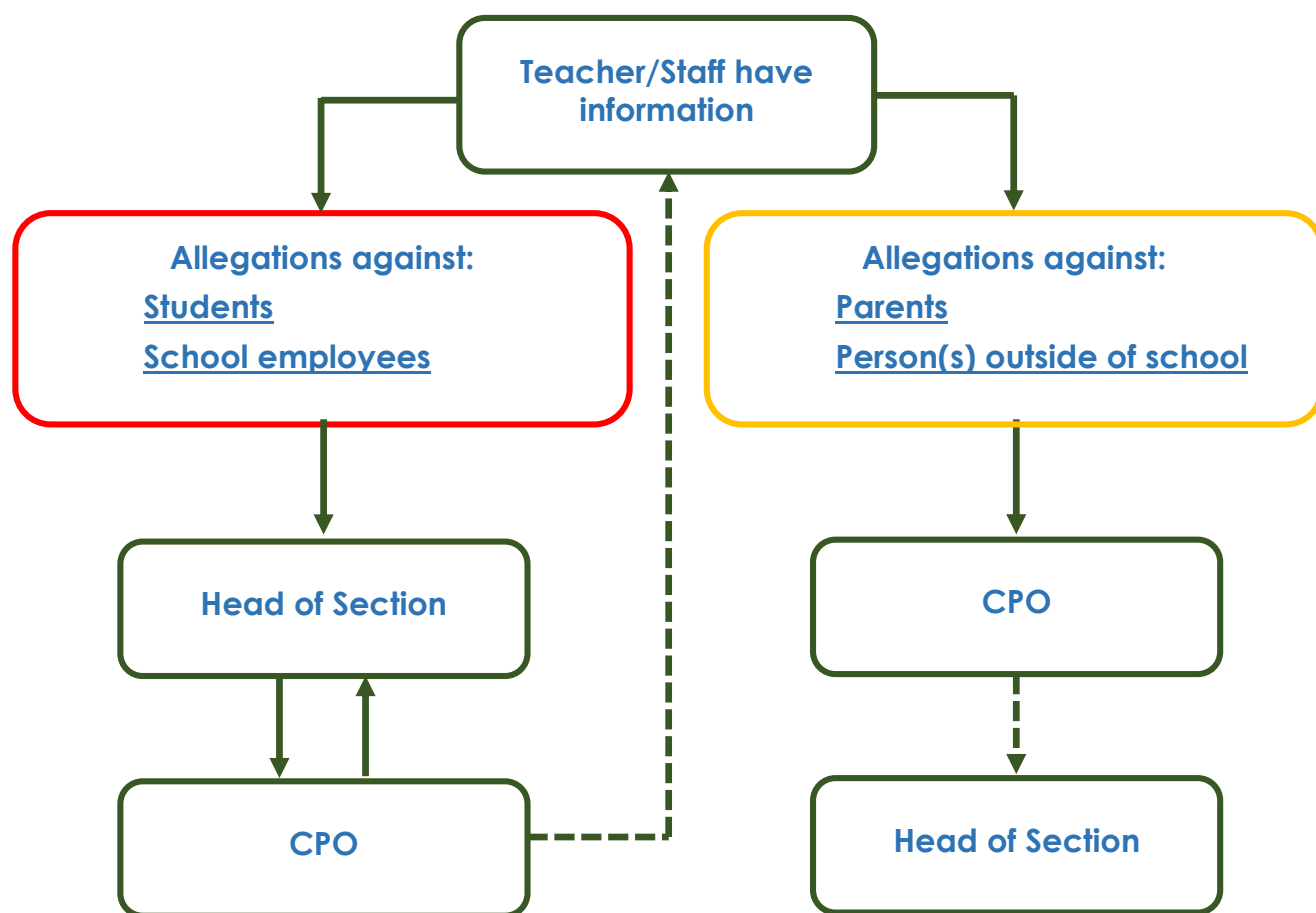
Staff responsibilities are as follows:

- Attend a training that covers the following themes: types of abuse, detection and referral, the CPP and the CPP procedures. The CPO will ensure that any new staff receives this training
- III. Abide by the organization's code of ethics/code of conduct in their conduct and interactions
- IV. Read, understand and sign a declaration of commitment to the CPP (see last page), keeping a copy of it for their personal reference. It is encouraged that while reviewing the CPP, staff members bring forward their questions and concerns to the CPO.
- V. Respect and apply the CPP and contribute to the promotion of a safe environment to improve outcomes for all children.
- VI. Request technical support via the CPG to empower staff and students. Possible

responses may be training sessions, school wide activities or talks from professionals.

- VII. Report all witnessed and suspected cases of harm against a child within or outside the organization grounds. Reporting of a case should follow the **referral map, and allegation or disclosure of harm procedure in the CPP**

**Referral map, and allegation or disclosure of harm procedure**



I- Staff member has information

The staff member may have information that indicates, or confirms, that a child is experiencing abuse through: observing certain signs, receiving information indirectly, witnessing an incident or receiving a direct disclosure from a child. Whenever a staff member has reasonable doubt that a child is experiencing any form of abuse, it is their responsibility to report this information as per the pathway indicated here. Suspicions should not be personally verified by the reporter; investigations, when

appropriate, are done by assigned specialist(s) as they should be conducted with utmost care to protect the child and reporter from harm. As such, a reasonable suspicion is sufficient for any community member to make a report (defined by reporting procedures).

## II- Briefly assesses and report

Before a staff member decides who to report to, s/he should always consider the best interest of the child; this includes considering the child's safety, preserving the confidentiality of information and considering who is in the best position to intervene to support the child.

### **Inside School vs. Outside School**

In order to simplify the pathway for staff members and to differentiate between responses, there will be a distinction between **allegations coming from inside of the school** and **allegations coming from outside of the school**.

**If at any point the staff member is unsure who they should tell, they must go directly to the CPO.**

#### **1. Inside School: Allegations against students or staff**

Definition:

This is when a staff member obtains information about an incident of abuse that the child experienced involving another student or school employee. It could be an incident that the staff member witnessed or information that was disclosed to the staff member. This type of information will usually be sufficient to suggest that the child is in danger or was involved in an incident where he/she was harmed.

Reporting Procedure:

In this situation, the **Head of Section** of the student's grade group should be informed as school policies and procedures can be used to respond to the allegation.

## 2. Outside school: Allegations against parents or individuals outside the school community

Definition:

This is when the staff member has information that suggests that the incident of abuse in question involved a parent or an individual outside of the school such as a family member, neighbor, a child that is not part of the school or any individual not related to the school in any way. This will most likely become apparent to staff members through a direct disclosure.

Reporting Procedure:

In this situation, the staff member should refer to the **Child Protection Officer (CPO)**. The CPO will be in the best position to assist the child as they will be able to contact parents when appropriate or seek external support, in coordination with administration when needed.

## 3. Unsure of the allegation or relying on signs

Definition:

This is when a staff member has noticed a change in the child's behavior or any indicators that they believe, independently or cumulatively, indicate that the child is being exposed to harm. This can also be when the staff member has insufficient information to determine who is being accused of causing harm.

Reporting Procedure:

In this case, the staff member should refer to the Child Protection Officer to discuss the sign(s) or the situation directly with them e.g. suspicious bruising on the child's neck or thigh. In all situations, the **CPO** will provide the staff with advice and guidance on how to deal with the child.

### **Reporting timeline:**

Staff members are encouraged to report as soon as possible. As a general guideline, if the staff member has reason to believe that the child is at imminent risk of danger then s/he must report within **24 hours**, otherwise, the staff member will need to report incidents/suspicions within **3 days**.

Imminent risk is when the child is in immediate danger e.g. a direct disclosure of sexual abuse. When unsure, the staff member should report as soon as possible to the CPO.

### **Allegations against CPO or principal:**

In case there are any concerns or suspicions about the conduct of the CPO then the concerned staff member should report directly to the **Principal**.

When there are any concerns or suspicions about the conduct of the Principal then the staff member should report directly to the **CPO** who will then report to the **board of directors**.

### III. What happens after an incident/concern is reported:

When an incident is reported, the situation will be analyzed by the CPO in coordination with a child protection agency (if needed) to determine the best response. Even when the report is directed to the Head of Section, the child protection officer will be informed and become involved in the protection of the child from harm. The best response in each incident will be a case-by-case basis, but will generally depend on the classification of risk defined in Appendix 2 and the best-interest of the child.

### **How to Communicate with the CPO:**

Reports to the CPO must be done in person or over the phone. The staff member may choose to write down notes to ensure that s/he does not miss out any details however these must be destroyed once the information is delivered. Any sensitive information about a child should not be emailed. The CPO will record available information in the reporting form provided in Appendix 9 and will make sure the staff member reporting has signed the form.

### **Feedback from CPO for reporting:**

When a staff member reports, the Child Protection Officer (CPO) will need to

inform them whether or not the child was followed up with. If the staff member reported based on signs or uncertainty, the Child Protection Officer (CPO) should confirm to the staff member whether or not their observations were correct and encourage them to continue making reports when they are concerned for a child's safety.

**Guidelines when receiving a disclosure:**

When an allegation or disclosure of harm is made against an adult or other child, community members should:

- 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 CPO
- Do not promise the child secrecy concerning the case he/she has shared, but do ensure his/her privacy and confidentiality will be respected as the case will only be discussed with the CPO and whoever is legally required to know
- Make the referral to the CPO following the referral map

A community member receiving a report should not:

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

Situations that place a child in imminent danger must be immediately reported to the CPO within 24 hours, or by the end of the working day.



### **After a report is made:**

Community members that report a case either by observing signs/symptoms or receiving a disclosure from a child should not discuss the case any further. The CPO will inform the reporter that the case is being followed-up. Depending on the situation, the CPO may ask for more information from the reporter and may give recommendations about how to deal with the child.

When a staff member is in further contact with a child that has disclosed sensitive information to them, they should:

- Act normally with the child
- Avoid mentioning sensitive details in any way in front of others
- Develop the child's belonging to the organization and ensure his/her inclusion as much as possible
- Preserve the confidentiality of the child
- Use positive reinforcement to support positive behaviours and highlight the strengths of the child
- Listen to the child if he/she wishes to discuss his feelings or the incident
- Report to the CPO if there is no improvement with the child or if the child seems distressed in any way

### **d) 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 when appropriate. Therefore, the nurse may be in a position where he/she may notice clinical physical indicators or psychological indicators of abuse.

The nurse will be provided with more information and general guidelines on suspicious bruising and signs by the CPO (CPO appendix 11). The nurse should consult with the CPO whenever there are suspicious signs on the child or if they receive a disclosure thereby abiding to the referral map and the referral pathway in Appendix 1.

The nurse is expected to preserve the privacy of any patient during examination and to protect confidentiality as standard practice entails. The nurse is expected to

follow the defined pathways of the CPP like all staff and to report any sensitive information that may either indicate or confirm child abuse to the CPO.

### **e) Administration**

Administrative units have further responsibilities in addition to abiding to the general responsibilities of staff.

#### **Principal**

The principal has the additional responsibilities of:

- Following up on case management whenever a child is deemed to be in immediate danger and requires referral, i.e. collaboration with child protective organizations (e.g. UPEL or himaya), and/or reporting and informing the relevant authorities.
- Meeting with parents in cases when harm is detected only when approved by the CPO and deemed safe by a child protection organisation.
- Taking decisions concerning breaches to the CPP by any member of the BESGB community, and leading discussions with relevant head of section for appropriate response as per existing school policies.
- Participating in the Child Protection Group (CPG) and facilitating its activities
- Allocating adequate time to discuss child protection issues with CPO, during management team and board meetings.
- Allocating resources for child protection activities and student/staff development.

The Principal can mandate a member of the administration to uptake his responsibilities when he is not available. This will most likely be a defined Head of Section.

#### **Human Resources**

The staff members involved in hiring and training employees (Head of Department, HoS & principal) are obliged to carry out recruitment checks before an employee is hired (Appendix 3). This primarily includes ensuring that staff members are free of previous child-related offences through requesting a Judicial Record and by contacting at least 2 references. Additional responsibilities include mentioning the CPP in future job advertisements, asking prospective candidates to review the CPP

before an interview and addressing the CPP during the interview.

#### **f) BESGB Community**

BESGB'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 organising 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:

- i. How to react to suspicions and disclosures of abuse
- ii. How to safely share concerns or disclosures as per the referral pathway.

#### **Parents/Caregivers**

BESGB recognizes that families are the foundation of a healthy child and acknowledge that families can face challenges common to all. Accordingly, parent/guardian(s) will be invited to attend awareness sessions to support and engage families in understanding, participating and promoting the child protection policy. Additionally, parents/guardians can discuss their concerns regarding the wellbeing of children with teachers and heads of section and can consult with the CPO if needed, especially if professional intervention is required. Parents should also read, understand and sign a declaration of commitment to the CPP (See last page), keeping a copy of it for their personal reference. It is encouraged that while reviewing the CPP, parents bring forward their questions and concerns to the CPO.

#### **Volunteers/Visitors**

Volunteers, and/or visitors, including volunteer parents, will be briefed on their roles and responsibilities by staff members or, preferably by the CPO, as per the Child Protection Policy (CPP). Any individuals with prolonged contact with children must be briefed on the CPP and must sign a declaration of commitment to the child protection policy (See last page). Short-term visitors or guest speakers should be briefed about the CPP and 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.

# 7. Managing allegations

Allegations of abuse will always be taken seriously and will be investigated before any actions or decisions are taken. There are no legal or organizational ramifications for allegations investigated and identified as "false" unless there is evidence that the reporter has deliberately given misleading information. It is the ethical duty for all those that observe or doubt a case of abuse to report it to the CPO. In this section, the possible responses to the detection of abuse, differentiated by the different source of harm, will be outlined.

## 1- Student - Student

Students are expected to abide by BESGB's disciplinary policies and procedures that outline all acceptable practices expected from students. The regulations and the disciplinary policy outlines consequences and procedures that the school may enact in case of any inappropriate behaviour of children towards other children. Counselling is an integral part in responding to student misconduct.

When inappropriate behaviour occurs on school grounds, it will be reported to the HoS, and the principal when appropriate, who shall then determine the consequences as per the school organization's policies with possible responses including:

- Counselling
- Verbal Warnings
- A meeting to be held with the students, parent/guardian(s), CPO and a member of the administration when appropriate
- Written warnings: Green, Yellow or Red warnings
- Suspension or Expulsion in some cases

### Bullying and inappropriate behaviours:

Bullying at school can compromise the wellbeing of a child and negatively affect their development therefore it will be taken with utmost seriousness, as it is a source of harm for students and repetitive cases may be signs of child abuse. The long-term effects of bullying can be extremely harmful therefore early detection and supporting all those involved is essential.

When there are cases of bullying or inappropriate behaviour by children towards

other children, staff should report to the HoS). It is the responsibility of the HoS to relay information to the CPO at regular set meetings (e.g. bi-weekly). The CPO should keep note and provide support when necessary. Keeping note of misconduct is one way of monitoring behaviour in the school and responding to common issues e.g. bullying, discrimination, sexism or racism.

### **Imminent Risk**

When a child is at imminent risk of harm due to an action by another student then the CPO and the administration have a legal obligation to report the incident to a judicial authority as expressed in Law 422/2002 as per the CPO referral pathway. The administration is encouraged to seek support from a CP organization when deciding whether or not to report an incident.

## **2- Student – Staff**

When an allegation is raised against a staff member, the school administration will be informed and proceed to promptly investigate the evidence available in order to determine the best response. The investigation procedure should be defined and developed by the school to ensure a transparent, fair investigation.

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

- VIII. Warning
- IX. Return to work conditional on seeking psychological support e.g. anger management
- X. Suspension
- XI. Dismissal

For more serious incidents a formal investigation should be conducted by the school. 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. Depending on the circumstances and accusation, the accused may receive a temporary suspension pending the findings of the investigation.

The administration will be obligated to transparently discuss the incident with the parents of the victim and then the victim upon the resolution of the internal investigation that should be concluded fairly and promptly.

### **Imminent Risk**

When a child is at imminent risk of harm due to an action by a staff member then the CPO and the administration have a legal obligation to report the incident to a judicial authority as expressed in Law 422/2002 as per the CPO referral pathway. The administration is encouraged to seek support from a CP organization when deciding whether or not to report an incident.

### **3- Student - Parents**

When the source of harm is a parent, then the CPO will meet with the Head of Section and relevant staff member then, consult with the concerned student to determine the apparent level of risk and discuss the available courses of action.

### **Responding according to risk**

BESGB will communicate with parents and work with families via the psychologist when possible. BESGB can only work with the family when the defined risk is considered "potential risk" and when there is low risk of harm to the child. Possible responses may include counselling, parental guidance, or referrals to partner organizations. If contacting the parents will put the child at risk of harm or if the issue, then the CPO should contact a CP organization.

In sensitive situations, it is recommended for the CPO to get in touch with a CP organization before approaching parents in order to guide a safe approach while providing information on possible services.

### **Imminent Risk**

When a child is at imminent risk of harm then the CPO and the administration have a legal obligation to report the incident to a judicial authority as expressed in Law 422/2002 and as per the CPO referral pathway. The administration is encouraged to seek support from a CP organization when deciding whether or not to report an incident.

## 8. Supporting our Community

### Members

Our aim is to create a culture where support can be requested by all members of BESGB 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, BESGB recognizes that staff and/or community members who become involved with a case of child harm may find the situation stressful and upsetting. The staff member can discuss potential supportive strategies with the CPO and Principal.

## 9. Confidentiality

### Data Protection and Storing Information

BESGB is well aware that all matters relating to child protection and safeguarding are confidential. Accordingly, any records that contain sensitive information about a child will be stored using strict confidentiality and data protection guidelines outlined in the CPO toolkit (Appendix 10). This includes information on how to password protect soft copies and clear guidelines on storage of hard copies.

### Need-to-know basis

The CPO will only disclose information about a child to other members of staff and/or authority on a need-to-know basis only. An authoritative party involved in the reporting pathway and legally mandated to handle incidents/cases of abuse will require information to intervene (Appendix 1).

### Consent before sharing information:

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 CPO. The only time 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.

### Mandatory Reporting

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.

### Protecting Sensitive Information

Spreading rumours about incidents or sharing details about cases constitute a serious break in confidentiality and would be referred to the CPG for appropriate action. All community members are expected to protect information and limit its spread at all times and in all situations.

## **10. Further Information**

As described in the above sections, the CPO will be the focal point for all further inquiries related to the CPP implementation. The CPO will have additional appendices focused on the following topics:

- Contact information of relevant organisations and references
- Risk Assessment
- Law 422/2002
- Reporting Form
- Confidentiality and Data Protection guidelines
- Information for Nurse
- Detailed Job Description for the CPO
- Required recruitment checks
- Guidelines for internal Personnel Investigations

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*Through this partnership, himaya commits to support BESGB in managing cases, providing, services and implementing procedures for this CPP.*