

CHILD PROTECTION POLICY

2017-2019



DATE ESTABLISHED: JUNE 2017



Wellspring Child Protection Policy

- This policy was developed by _____ and adopted __/__/2017
- The designated DCPO is _____
- The designated CPG members are: _____(Principal), _____(Assistant Principal), _____(DCPO), _____ (W-PAC representative), _____ (Teacher representative), _____ (Student representative)

TABLE OF CONTENTS:

1. Policy Statement	6
2. Policy Scope	6
3. Introduction	6
4. Purpose of the policy	7
a) A Shared Responsibility	7
b) Child Protection Issues	8
5. Ethos	8
6. CP Structure and Responsibilities	10
a) Child Protection Group (CPG)	10
b) Designated Child Protection Officer (DCPO)	11
c) Staff	12
d) Nurse	3
e) Administration	14
f) Wellspring Community	14
7. Managing allegations	15
a) Student - Student	15
b) Student – Staff	18
c) Student - Parents	19
8. Supporting our Community Members	19
9. Confidentiality	20
10. Monitoring and evaluation	20
11. Further Information	21
12. Appendices	22
Appendix 1: Wellspring's Referral Pathway	22
Appendix 2: Defining Imminent Risk and Potential Risk	25
Appendix 3: Required recruitment checks	27
Appendix 4: Protection procedures when a volunteer or visitor is expected in school	28
Appendix 5: Preferred DCPO characteristics.	29
DCPO Toolkit	30
Appendix 6: Contact information of relevant organizations	30
Appendix 7: Risk Assessment	31
Appendix 8: Law 422/2002	33
Appendix 9: Reporting form	35
Appendix 10: Confidentiality and Data Protection	37
Appendix 11: Information for Nurse	40
Declaration of commitment to the Child Protection Policy	41

Acronyms:

CPP- Child Protection Policy

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

DCPO- Designated Child Protection Officer

CPG- Child Protection Group

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

MoSA- Ministry of Social Affairs

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 Wellspring.

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.

Child Psychological Abuse

Injury to the psychological capacity or emotional stability of the child as evidenced by an observable change in behavior, 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

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

Bullying

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

Imminent Risk

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

Potential Risk

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

1. Policy Statement

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

2. Policy Scope

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

3. Introduction

This policy is in line with a child rights-based approach under the **UN Convention on the Rights of the Child (CRC)** signed and ratified by Lebanon on May 14, 1991. This approach 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 Wellspring 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.

The policy is also guided by **focus group discussions** with staff and students, as well as **surveys** from parent/guardian(s) within Wellspring, for the creation of a document representative of community members' needs and priorities¹.

4. Purpose of the policy

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

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

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

a) A Shared Responsibility

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

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

² *himaya is a Lebanese non-governmental organization founded in 2009 and dedicated to protecting children from all forms of abuse. It operates across the Lebanese territory and*

throughout the academic year. Ultimately, involving children in their own protection and encouraging co-operation among community members will encourage the development of essential life skills associated with the reduced likelihood of child abuse and neglect.

b) Child Protection Issues

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

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

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

5. Ethos

Wellspring's mission calls for a safe collaborative community that maintains positive learning environments that respond to the needs of its community members, while aiming for the holistic development of students (cognitive, social, emotional, physical, ethical...).

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

hygiene...), transportation services and driver assessments as well as food services for balanced nutrition and food safety practice.

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

Wellspring fully recognises the contribution a school can make to ensure children feel safe and appropriate action is taken whenever there is a violation of their rights. Wellspring is adhering to Ministry of Social Affairs (MoSA) recommendations to develop a policy that protects children and promotes their wellbeing. Such a policy can help clarify expected behaviour, unacceptable behaviour, and legal obligations and encourage practices that would allow children to feel safe. To create such an effective policy, Wellspring has established a partnership with himaya² to organise all aspects in the development, adoption and implementation of this policy. When effective, a children protection policy primarily creates a child friendly environment. Within this environment is a system to help detect and manage all claims of abuse, while preventing further violations of children's rights.

² *himaya is a Lebanese non-governmental organization founded in 2009 and dedicated to protecting children from all forms of abuse. It operates across the Lebanese territory and offers services that cover a large spectrum of intervention: prevention, psychosocial follow-up, raising awareness about child abuse, advocacy, capacity building, research and development.*

6. CP Structure and Responsibilities

a) Child Protection Group (CPG)

The **Child Protection Group (CPG)** stands to monitor effective implementation of the policy throughout the school, and promote a safer school environment via activities throughout the academic year.

To ensure all community members are represented the CPG is made up of the following: the Principal, the Assistant Principal, the Designated Child Protection Officer (DCPO), a Wellspring - Parent Association Committee (W-PAC) representative, a teacher representative, and the president of the student council.

The CPG responsibilities are as follows:

- Overseeing the completion of the required training by all teachers, staff, students and CPG members annually.
- Ensuring all terms of the CPP, within Wellspring's jurisdiction, are respected (school campuses, facilities buses, school events and field trips organized by the school).
- Identifying activities throughout the academic year that promote the CPP or promoting a theme related to child development or child protection.
- Overseeing the continuous completion of monitoring and evaluation of the policy content and its application in Wellspring and by the community members.
- Communicating community members' needs to himaya or other relevant organizations for action.
- Identify concerns or factors negatively affecting the wellbeing of students in wellspring including matters related to physical structures and nutrition.
- Ensure that there is an active DCPO throughout the academic year and nominating a replacement when needed
- Reach majority consensus on the assigning of the DCPO yearly

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

b) Designated Child Protection Officer (DCPO)

The **Designated Child Protection Officer** (DCPO) is the assigned officer responsible for handling all witnessed or suspected cases of harm against a child within Wellspring. The Principal will shortlist nominees to the CPG for the position of DCPO where a majority should approve the selection.

The DCPO's responsibilities are as follows:

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

The DCPO is required to fill in a 'Reporting form' (DCPO toolkit Appendix 9) for a reported case that shows a child is facing potential risk or imminent risk. The forms will be kept as records for all reported cases of violation against children within Wellspring. Soft copies should be password encrypted when they are sent to child protection organizations (DCPO toolkit appendix 10). Any hard copies and written information should remain secure in a locked locker or cabinet at all times in a room with limited access to guarantee confidentiality (DCPO toolkit Appendix 10).

They will be used whenever external organisations need to be sought out for help managing a case, and for monitoring and evaluation purposes.

The DCPO is responsible of breaches of school rules whenever this breach poses a risk of serious harm to a child. Thus, not all misconduct (such as not abiding to the dress code) are handled by the DCPO. In such cases, the code of conduct and existing disciplinary measures will be followed.

It is *preferred* that the DCPO be the school counsellor or social worker however, it is not necessary. When the DCPO is not the school counsellor or social worker, co-ordination between the parties is highly recommended. What is most important is that all incidents and records remain confidential and that the privacy of students is respected at all times.

(Appendix 5 identifies recruitment requirements and preferred characteristics for the DCPO).

c) Staff

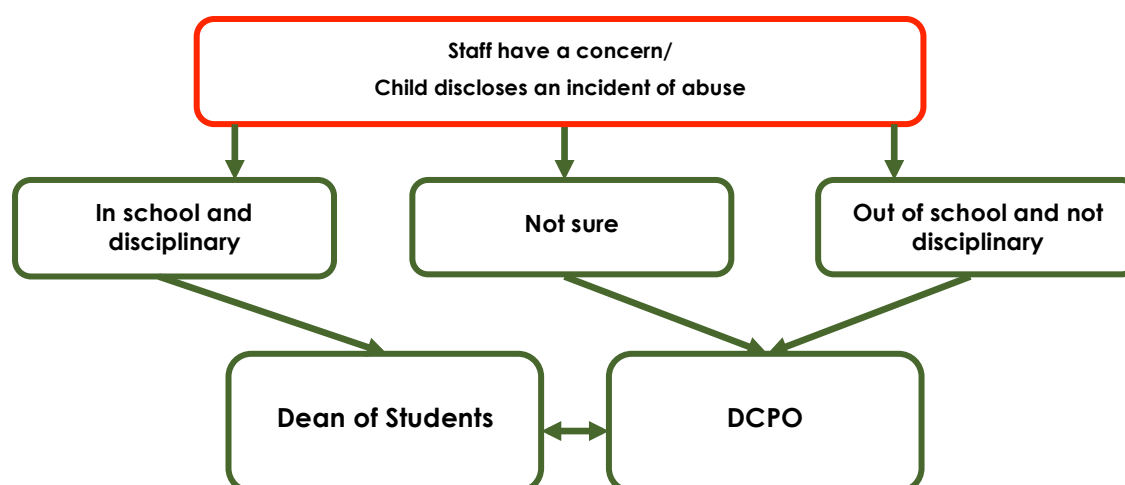
All staff are required to attend himaya's training that covers the following themes: types of abuse, detection and referral, introduction to the CPP and the CPP procedures. As such, Wellspring staff would be sensitised to the reality of violations of children's rights, the consequences of these violations,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

Staff responsibilities are as follows:

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

Referral map, and allegation or disclosure of harm procedure

Referral map:



If the staff member feels that the child is at imminent risk then they must report within 24 hours, otherwise, the staff member will need to report the incident within 3 days. Recall that imminent risk is when the child's wellbeing is at risk and requires immediate intervention e.g. a disclosure of sexual abuse.

When the issue requires disciplinary measures as per the school rulebook then the Dean of Students should be informed of the incident or, as protocol indicates, the Assistant Principal or Principal. It will then be the responsibility of the Dean of Students, Assistant Principal or Principal to inform the DCPO of the incident e.g. if there is a case of bullying in the school between two enrolled students.

When the issue does not require disciplinary measures or is not within the jurisdiction of the school, then the issue should be directly reported to the DCPO e.g. if the issue is related to the family of the child or has occurred outside of the school grounds. The issue should not be further discussed with other staff members to preserve confidentiality.

If the staff member receiving the report is uncertain of the correct response, then they should approach the DCPO directly in order to preserve confidentiality. The DCPO may then determine the correct response as per the student handbook, the Child Protection Policy and in consultation with the school administration.

When an incident is reported, the situation will be analysed by the DCPO in

coordination with the Principal, Assistant Principal and, when needed, the Dean of Students to determine the response. Disciplinary action will be determined by the administration while the severity of the incident will be determined by the DCPO using the classification of risk described in Appendix 2. The best response will depend on the classification of risk and will be discussed with a child protection organization.

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

1. Find a quiet, private place to talk to the child
2. Stay calm and listen carefully
3. Reassure the child that he/she has done right by speaking up
4. Reinforce the notion that the child has the right to be safe
5. Avoid investigative and leading questions
6. Inform the child that the case will be referred to the DCPO
7. 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 DCPO and whoever is legally required to know
8. Make the referral to the DCPO following the referral map

A community member receiving a report should not:

- 1- Express shock or disbelief
- 2- Attempt to determine if the allegation is valid or invalid
- 3- Pressure a child to disclose
- 4- Call the child's parents
- 5- Promise to keep the reported incident a secret
- 6- Lecture the child or blame them in any way
- 7- 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 DCPO within 24 hours, or by the end of the school 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. A reporter

may only obtain information from the DCPO on whether the case was followed up on.

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

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

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 if 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 DCPO (DCPO appendix 11). The nurse should consult with the DCPO 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 of any information provided. The nurse is expected to follow the defined pathways of the CPP like all staff and to reveal any sensitive information that may either indicate or confirm child abuse to the DCPO.

e) Administration

In line with staff roles and responsibilities, Human Resources (HR department) is expected to ensure the required recruitment checks (Appendix 3) are carried out. This primarily includes ensuring that staff members are free of previous child-related offences. HR is also expected to mention the CPP when possible in future job posts, to ask prospective candidates to review the CPP before an interview and to address the CPP during the interview.

The Principal has 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.
- Taking decisions concerning breaches to the CPP by any member of the Wellspring community, and leading discussions for appropriate response as per Wellspring's code of conduct and Wellspring Discipline policy.
- When appropriate, notifying parents of the situation.

The Assistant Principal will be consulted by the Principal and can be mandated by the Principal to fulfil responsibilities as well as ensure responses are being implemented. When the principal is unavailable, staff members should inform the Assistant Principal.

f) Wellspring Community

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

CPG and the school counselor will be accessible to discuss all concerns regarding the wellbeing of children and families, with possibilities of exploring solutions and referral to professionals.

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

Wellspring'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:

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

7. Managing allegations

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

a) Student - Student

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

As per the student handbook, when incidents occur within the school grounds, they will be reported to the Dean of Students, or the Principal or Assistant Principal, who shall then determine the consequences as per the student handbook with possible responses:

- A formal warning is issued through the Wellspring administration
- A meeting to be held with the students, parent/guardian(s), DCPO and a member of the administration either the Dean of Students or Principal when possible
- Relevant ramification as per the school handbook: Detention, Suspension or Expulsion.

When this occurs, it is the responsibility of the Dean of Students, Principal or Principal Assistant to relay the event in questions to the DCPO who must keep note at this point and provide the support necessary.

Bullying at school can compromise the wellbeing of a child and negatively affect their development therefore it will be taken with utmost seriousness. The long-term effects of bullying can be extremely harmful therefore early detection and supporting all those involved is essential.

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

b) Student – Staff

When an allegation is raised against a staff member, the school administration will be informed and proceed to promptly investigate the evidence available in order to determine the best response. During an investigation of a staff member, the school administration will protect the privacy of staff until circumstances are clarified and a formal decision is taken.

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

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

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

When a child suffers significant harm from a staff member then the DCPO and the school administration have a legal obligation to report the incident to a judicial authority as shown in Law 422/2002 in the DCPO appendix 8.

c) Student - Parents

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

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

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

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

8. Supporting our Community Members

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

9. Confidentiality

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

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

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

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

10. Monitoring and evaluation

The information gathered from the focus group discussion and the survey, prior to

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

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

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

11. Further Information

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

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

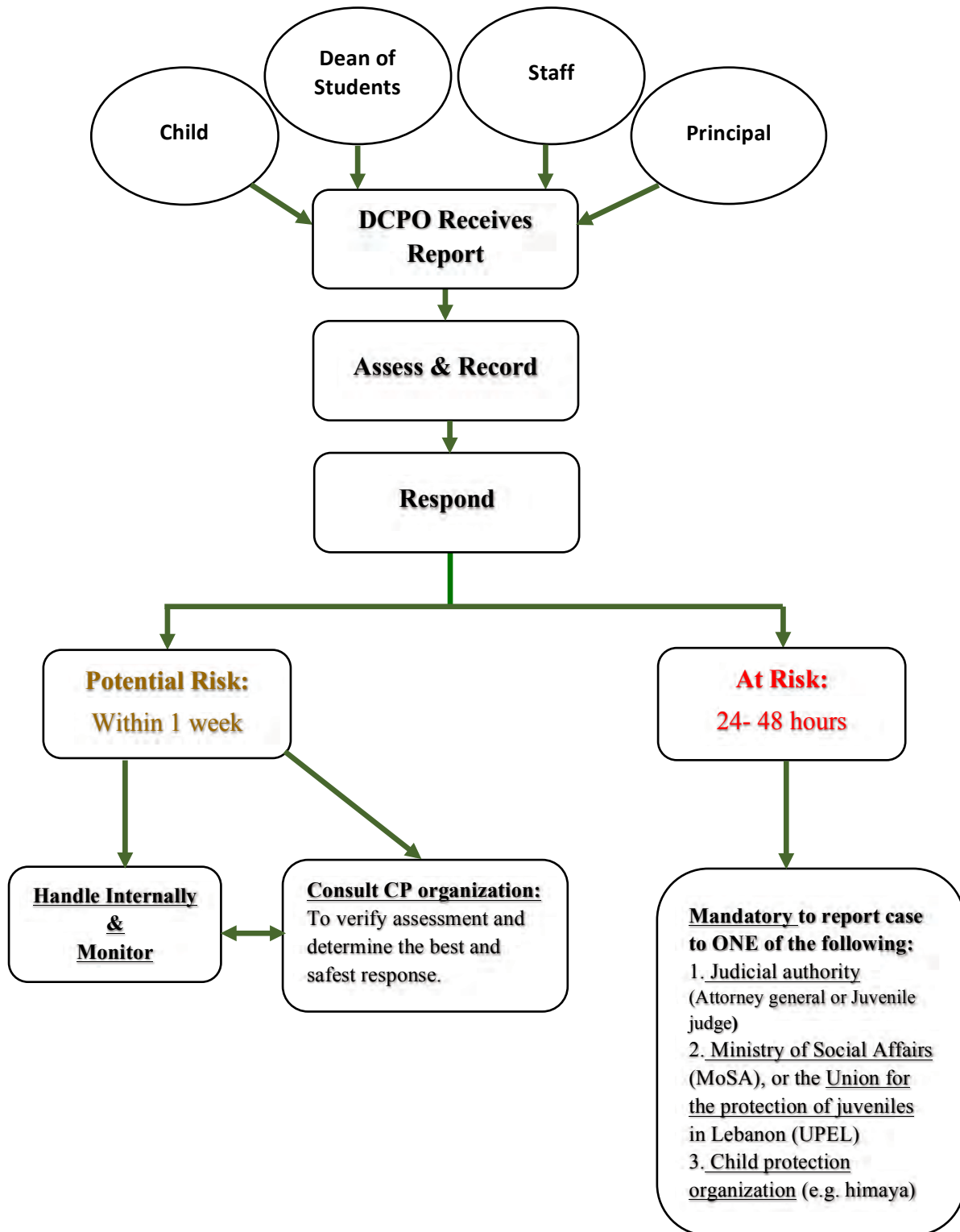
This policy was established in June 2017 by Wellspring's leadership team in partnership with Himaya and will be reviewed on a biannual basis, unless there is a need for an immediate change in policy. The proposed date for the next review of this policy document is June 2019. Through this partnership, Himaya promises to support Wellspring in all cases of violation detected, services required and implementation procedures for this CPP.

Signature of Board Chairperson:

Date:

12. Appendices

Appendix 1: Wellspring's Referral Pathway



I. DCPO Receives Report

A report of abuse can be presented to the DCPO from multiple sources within the school. What is essential is that the confidentiality of individuals is respected by the different parties and that the incident is described to the DCPO with the consent of the child, when possible.

This pathway recognizes and applies to four reporting situations:

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

II. Assess & Record

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

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

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

III. Respond

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

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

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