



Child Protection: Translating policy into practice within non-formal education



Al Madad
Foundation

himaya
Pour l'innocence en danger

Editor's Note

The work on this study began in February 2019. Before the year was out, political protests had shaken Lebanon to its core, resulting in major upheaval and dramatically impacting the everyday lives of its citizens. Unrest continued, and the change it would bring was still uncertain when Coronavirus resulted in a country-wide lockdown in March 2020.

In such a short period of time, the world has changed more than we could have ever anticipated, but this examination of the challenges of enforcing child protection policy in a country under pressure is as relevant as ever. The Coronavirus lockdown forced the closure of NFE centres, but they will reopen. The economic devastation wrought by the turmoil in Lebanon's financial system will undoubtedly lead to even less funding for programmes but, with the Syrian Crisis so far from resolution, the need to educate a generation of displaced and refugee children is likely to remain for some time.

It is our belief that new crises should not detract from existing needs but instead shine an even brighter light on their urgency, and our sincerest hope is that this paper will prove to be one additional tool for those seeking to address the challenge.

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Foreword

"The teachers here are caring and loving, they talk to us and try to understand our mistakes...there is respect and they teach us to accept each other".

Child in Org 3 FGD

"I feel safe the moment I enter the NFE centre, but I don't ever feel safe once I am outside of it" (When asked why:) "This country isn't my country, so fear surrounds me even at the entrance of the building because I feel exposed and vulnerable to the outside world. But this fear dissipates once I climb up these stairs and enter my classroom."

Child in Org 9 FGD

This paper is concerned with the translation of policy into practice, and was conceived with an enormous respect for the non-formal education system in Lebanon and its staff. Within this system, teachers and administrators create stable, safe and secure environments for children whose home environment is often the complete opposite. The vast majority of staff working in this field do so with the very best of intentions and there is a huge amount of success to celebrate. This study was undertaken with a view to strengthening the policies and practices protecting service users and staff, and to providing the dedicated individuals facing so many daily challenges with the additional resources they are seeking.

Al Madad Foundation maintained a NFE centre- The Children's Learning Centre- in Baalbek, Lebanon from 2015-2019, annually serving roughly 1,200 children and their families through Early Childhood Education, Homework Support and Basic Literacy and Numeracy. The desire to undertake this paper was inspired by the excellent staff who worked so hard to make the CLC a safe, enriching and beautiful environment for our pupils.

-Al Madad Foundation

himaya is a Lebanese child protection NGO working through its different programmes to create a safer environment for children all over Lebanon. A few years ago, through its Capacity Building and Research and Development Department, **himaya** started supporting schools, centres, community-based organisations, municipalities and others into developing and implementing their own Child Protection Policies [CPPs]. The latter, when tailor-made to each structure, can help create a safer environment for children, especially in the places in which they spend much of their childhood. The collaboration with Al Madad Foundation on this report allowed us to gain a better understanding of the challenges of implementing a CPP in a NFE setting, as well as highlighting good practices, based on the experience and expertise shared by stakeholders from NFE centres. We hope that the findings of this report will serve as a guide to improve how centres develop and adapt a CPP and related procedures in order to better protect children.

-himaya

Acknowledgements

Al Madad Foundation would like to thank the non-formal education centres that participated in this study. Without the time, effort and cooperation of their teachers, staff, parents and pupils this work would not have been possible. The Foundation would also like to thank himaya staff working both at headquarters and in the field, who so thoroughly and conscientiously undertook the research and data compilation for this paper. Finally, AMF would like to acknowledge the continuing support of its Board, which is fully committed to further exploring the challenges and opportunities in NFE, and to promoting and sharing understanding and best practice amongst our colleagues in the field.

himaya would like to thank the staff, parents and children of the 10 NFE centres who participated in this study for their trust. We hope that we did justice to the experiences you shared with us. himaya would also like to thank all himaya team members that contributed to this report, particularly the Capacity Building and Research and Development Department. himaya would like to especially thank Al Madad Foundation for their invaluable support and for reflecting the findings of the field in their writing of this report.

Executive Summary

Following years of operation in Lebanon, and first-hand experience of the gaps, inconsistencies, and confusion prevalent in Child Protection [CP] regulation and implementation in the country, AMF recognised an urgent need to investigate provision within children's education, and more specifically, within non-formal education. While we found this to be a developing area with wide scope for growth and improvement, what was particularly surprising was our struggle to identify practical examples of guidance or procedures currently in use by organisations to translate their CP policies into daily practice. The creation of such a framework seemed the logical next step, and while we were confident in our own experience of setting CP standards in projects and subjecting them to rigorous testing and scrutiny, we recognised our limitations when it came to conducting field research and compiling independent data. The opportunity to partner with local specialist organisation, *himaya*, to bring this project to life not only filled the gaps in our own expertise but also provided invaluable local knowledge and an on-the-ground perspective that added important context to the work.

For us, the need for this examination was clear. In order to understand the gaps and challenges, we wanted to take a closer look at how organisations in Lebanon translated their CP policies into practice within NFE settings. By doing so, we hoped that a greater understanding of child protection practice within NFE would emerge and light would be shed on facilitators and barriers to maintaining the safety of children. The result would allow us to better support the promotion of the adequate practice that we felt was needed.

Ten Lebanese NFE centres, located in different regions and with diverse socio-economic and cultural characteristics, took part in this study, with Syrian refugee and disadvantaged host community [Lebanese] households their major beneficiaries. Between April and September of 2019, specially trained staff from *himaya* carried out data collection through focus groups with students, parents and teachers, individual interviews with members of the field administration team at the centres, and Child Protection Officers [or any professional designated to be the focal point on child protection issues]. The detailed interview guides used were developed specifically for the project and were based on national Child Protection Policy [CPP] guiding documents, international toolkits and guidance, CP minimum standards in humanitarian practice and the personal experience of AMF and *himaya*.

One of the first findings, and one that throws the resulting challenges into starker focus, was that for the majority of organisations the impetus for the development of a CPP came from an international donor. Although consultation between the donor organisation and the recipient's headquarters staff was common, consultation with field staff or service users was universally absent. Perhaps unsurprisingly, the resulting policies were often viewed by those tasked with their implementation as irrelevant and some were presented during this assessment as only loosely adapted for use in Lebanon. It is important to note, however, that this does not mean that participants were unconcerned with CP, and in fact the findings were the opposite, with a strong desire from staff for more practical implementation guidance.

The assessment also found that the following operational obstacles were prevalent:

- A focus on academic learning to the detriment of CP implementation
- Inadequate resources allocated to ensuring a safe physical environment
- Gaps in practical processes to ensure child safety [fire safety, register of attendance, arrivals and departures process, etc.]
- A lack of defined Whistleblowing Policies for staff
- Questionable staff recruitment practices

The data specifically highlighted the impact of employing a full-time Child Protection Officer [CPO] with appropriate training. Common practice was instead found to be that professionals with a psychosocial background [psychologists, special needs teachers, social workers] were asked to take on this role in addition to their other duties. The dual post holders interviewed reported that, for a number of reasons, they lacked confidence in this aspect of their work, partly due to the fact that they were regularly based at the headquarters of the organisation, far from the NFE centre, so were not on-site full time.

Similarly, teachers at most of the centres reported a lack of confidence in their own ability to carry out CP work, which they attributed primarily to a lack of training. It is the opinion of this assessment however, that while partially true, this was not the only issue. Other emergent themes included confusion around respecting 'cultural sensitivities' [for example some teachers felt powerless to prevent violence against children in the face of

corporal punishment at home -considered in some contexts as being culturally acceptable] and a perceived lack of follow-up after a referral had been made.

The vast majority of parents and children surveyed were unaware of the existence of a CPP at their NFE centre, and those that were felt unsure about the content, despite the staff reporting that educational and awareness sessions were held for children and parents. One barrier reported by multiple children was the sense that they would prefer not to share “the secrets of the house” or, if their friend was being abused, they would treat it as a “childhood secret”.

Whilst it became clear during this process that the intricacies of the issue stretch far beyond what a policy, or those tasked with its enforcement, are capable of fully surmounting, based on the findings it is our firm belief that the situation can be significantly improved. Our recommendations would be:

- By taking ownership of the proactive creation, implementation and review of their own CPPs, organisations can confidently meet the requirements of international donors and maintain their own consistent policies and practices regardless of any change in partner.
- Independent donors and partners should insist that an adequate portion of the budget of any supported project is devoted to the proper preparation for, and implementation of, Child Protection.
- Organisations should understand that a CPP and a practical Implementation Plan, while complimentary, are not interchangeable and that both must be robust and fit for purpose.
- It is imperative that teachers are confident in their knowledge of what pupils can expect if they make a disclosure, as well as in where a teacher's personal role in the process ends. They must also feel empowered to state the expectations of their organisation to parents clearly and confidently.
- Ideally organisations would employ a CPO as a stand-alone position. However, if this is not feasible, a solution might be to assign more resources to training for the hybrid CPO. Through this study we have also seen the benefit of having a CPO based permanently on-site rather than at the organisational headquarters or another centre.

Introduction

? The issue and why it's important

Implementing Child Protection practices can prove challenging at the best of times for all professionals and organisations working with children, and when formal structures are strained, or absent altogether such as in crisis situations, focus on this important area can be lost amid the need to address more reactionary necessities. Child Protection regulations in countries where non-formal education [NFE] programmes are most prevalent can be relatively lax, and enforcement can be patchy. Unfortunately, this sometimes means that organisations are able to attest to abiding by policies that conform to local law, while at the same time still inadequately protecting the children with whom they work.

While most NFE centres are obliged to have a Child Protection Policy [CPP, often by virtue of their association with a donor organisation], these are rarely translated into what in the UK would be referred to as Safeguarding Procedures-applied actions, regular checks or thorough follow-up. These

gaps in practical action put children and teachers at risk within environments where they should feel safe, and leave organisations open to liability and dysfunction. Without being held to a higher practical, consistent and enforceable standard across the entirety of their operations, organisations working in NFE will struggle to provide the level of safety for their service users that their stakeholders, be they donors, directors or statutory bodies, both expect and require.

We believe that in charities' rush to tackle this issue from the top down, they have overlooked bottom-up practical guidance and instead created a culture that values policy over practice. While good practice certainly exists, it is more often than not a result of informal procedures developed and followed by staff on the ground without the benefit of an official framework or replicable documentation. This can often be attributed to field workers' more detailed knowledge of a project's implementation and their

deeper understanding of factors such as local cultural norms, security restrictions or resource deployment, which are understandably rarely as minutely appreciated by those setting overall organisational policy. When this closer learning is not fed through, or carries insufficient weight in the final construction of policy, the result can be merely the illusion of safety, which benefits no one.

The vast majority of those working in the field do so with the very best of intentions, but when the worst happens, scrutiny and blame fall equally, and sometimes unfairly, across all staff. In the absence of a centralised universal oversight mechanism, providing charity workers with the tools necessary to self-monitor and to identify and eliminate risks early on is essential if we are to see any significant, sustainable change.

? What exists and what's lacking

There are two national Child Protection Policy (CPP) guiding documents that apply to NFE centres in Lebanon. The most recent is the 2017 Ministry of Education and Higher Education (MEHE) CPP that was developed in partnership with the Ministry of Social Affairs (MoSA) and the Ministry of Justice (MoJ), with UNICEF as its lead technical partner. This policy outlines response and referral pathways for incidents of violence against children detected at public schools whether they take place on school grounds, at home or in communities. According to MEHE, this policy is being rolled out to public schools in cohorts as it allows for monitoring and evaluation of its implementation and reduces the burden on the Ministry. Although MEHE outlines its aim to incorporate NFE centres into this policy, it is not clear at this time if they are currently being included or if they even have access to the document (as it is not publicly available). The second is MoSA's 2016 Unified Child Protection Policy. Developed with a coalition of "civil society organisations and associations working with children in Lebanon", technically it is now required to be accepted and implemented by all organisations working with children. However owing to a lack of official follow-up it is difficult to determine the extent to which this is occurring. The existence of these two different policies reflects the mixed jurisdiction in which NFE centres find themselves. While technically civil organisations, therefore under the jurisdiction of MoSA, they also provide education, which achieves the mandate of MEHE. Lebanon's existing legislation on child protection, Law 422/2002 on the Protection of Juveniles in Conflict with the Law and/or at Risk, and existing procedures applied by

child protection agencies in Lebanon such as the Standard Operating Procedures for the protection of juveniles in Lebanon (SOPs) facilitate the existence of such policies, but not their implementation or monitoring.

For UK-based charities working in Lebanon, the Department for International Development (DFID) provides some guidance. The DFID enhanced and specific safeguarding standards for UK Charities and NGOs (2018) report responded to a need to provide more unified and detailed guidance compared to what previously existed (an earlier document Minimum Standards for Child Protection in Humanitarian Action [2012] is also worth noting in this context). The 'Unified Child Protection Policy' and DFID 'Standards' paper share a common aim to unify policy but while both are useful in their own right, neither aims to provide direction in the practical application of policy [Safeguarding], nor do they offer a checklist of practices specific to NFE in Lebanon. In this sense, this report more naturally follows on from the extensive Guidelines for Child-Friendly Spaces in Emergencies (Save the Children, 2011), which does contain practical guidance.

It has been extremely difficult to discover practical examples of written guidance or procedures used by organisations to translate these national Child Protection Policies, or their own organisational CPPs, into on-the-ground action. In addition to the obvious dangers this poses for the children they serve, it also exposes the organisations themselves, regardless of their unwritten "cultural" procedures, to increased scrutiny by bodies such as the UK Charity Commission, DFID and MoSA.

? Objectives of this study

The main objective of this study was to gain a much better understanding of the needs, practicalities and deficiencies associated with the CPPs of NGOs working in Lebanon, in particular those specialising in NFE. Based on this solid foundation, we felt that we would then be better placed to support Lebanese NGOs in promoting adequate Child Protection practices within NFE, lobby for increased stakeholder participation and feedback within NFE and develop recommendations for addressing the issue targeted at key policy makers and relevant stakeholders.

Equally as important as the above is viewing with clarity the limitations of the protection, even at an ideal level, that an NGO is able to offer inside an NFE environment and the factors that lie outside its power to change. In doing so we can then narrow our focus to "fixing the fixable" within the hugely

complex environments in which they operate. With this in mind the parameters of the study were fixed to examining how children and staff are protected while the responsibility of a NFE organisation (i.e. on transportation provided by the organisation to and from their centre, within their NFE grounds, etc.) and how Child Protection concerns outside of the NFE environment (ex- violence in the home that is reported or is obvious due to physical injury) are dealt with by the NFE organisation. What this study

does not address are Lebanon's current governmental practices, such as how Child Protection is dealt with within the country's judicial system and in its state and private schools, and its ability to cope with Child Protection cases referred to the government. Neither is this study a complete review of Child Protection issues for children in general, or those specific to refugee children, although this will be touched upon in the context of the findings.

Strengths and Limitations

STUDY STRENGTHS

By focusing on the actions of international donors, and in particular the role they play in both setting and monitoring Child Protection standards within the projects that they fund, it is hoped that this paper will encourage a more detailed and proactive approach.

The participating organisations range from those with large international headquarters and multiple NFE centres to small charities with only one centre and no headquarters.

Focus group discussions (FGDs) were held with a wide range of community members (pupils, parents, teachers) and, in most cases, head office staff were interviewed separately from field office staff in an effort to encourage candour.

Centres were de-identified to the extent that was possible to avoid any pre-existing views regarding organisations colouring the results.

STUDY LIMITATIONS

While a number of large international organisations working in Lebanon were invited to participate, most declined to respond [the two which did were included].

Bullying and violence between children is an issue on the periphery of this report. While it was touched upon briefly in some pupil FGDs, it was felt that it could not be a focus of this study.

Most interviews were conducted in Arabic, and while we have worked hard to ensure that all translations were as accurate as possible there always remains a risk of misinterpretation.

Centres were responsible for issuing invitations to prospective FGD participants. Where it was not possible to extend an 'open invitation' to all parents, centres selected those invited.

CONTEXT

The Syrian Crisis

Entering its ninth year, the Syrian Crisis is considered the largest humanitarian disaster since WWII. Within Syria itself approximately 6 million of its citizens are internally displaced[1] and another 5.5 million have fled as refugees to Turkey, Lebanon, Jordan, Iraq and Egypt[2].

As of 2019, Lebanon, with a total population of 5.9 million, was host to an estimated 1.5 million refugees, the highest number per capita of any country[3]. The Syrian Crisis has impacted Lebanon's political and economic stability, and attempting to accommodate the influx has burdened essential infrastructure such as the education, labour and healthcare sectors. Government authorities have adapted by formulating and enforcing policies with the support of aid groups, which has also facilitated the inflow of funding and humanitarian assistance.

According to the UNHCR, 488,000 school-aged children ranging in age from 3-18 are currently residing in Lebanon[4]. In order to accommodate Syrian children within public schools, the Ministry of Education and Higher Education (MEHE) began a second shift system where the day is divided into a 'morning shift' from 8AM-2PM for primarily Lebanese children and an 'afternoon shift' from 2PM-5PM for Syrian pupils. As of March 2019, 346 public schools in Lebanon operated a second shift which allowed the country to accommodate an additional 210,964[5] refugee pupils. According to the MEHE's

estimates, 42% of Syrian children are now enrolled in public schools, with another 10% participating in non-formal education (NFE) [6], leaving the remaining 58% of Syrian children out-of-school[7]. The challenges to addressing this gap are daunting. The UNHCR estimates that 70% of all Syrian families live below the poverty line[8], meaning that they are unable to financially maintain transport to and from school or to afford additional costs such as stationery and books. It is also the main cause of school dropout, encouraging families instead to turn to child labour, or, in the case of refugee girls, early marriage[9].

Large class sizes and longer hours for teachers in educational environments that are under-resourced add to the challenge[10] meaning that although the quantity of children enrolled has increased, the quality of the education they receive cannot be guaranteed [a common challenge for providing education in emergency settings]. Teachers in Lebanon have reported difficulties in class management and discipline when dealing with Syrian students[11], and with the all-Arabic Syrian curriculum differing from the Lebanese practice of including subjects taught in English or French, it can be difficult for Syrian students to transition[12]. This is only further compounded by the additional dangers of bullying and racism that they are exposed to in schools, as well as trauma from exposure to violence that can require psychosocial support.

[1] UNHCR [2020]. Syria Emergency. Retrieved from UNHCR UK website: <https://www.unhcr.org/syria-emergency.html>

[2] UNCHR [2020]. Syria Regional Refugee Response. Retrieved from <https://data2.unhcr.org/en/situations/syria>

[3] UNHCR [2019] Global Focus Lebanon. Retrieved from <https://reporting.unhcr.org/node/2520>

[4] Human Rights Watch [2018]. Lebanon: Stalled Effort to Get Syrian Children in School. Retrieved from <https://www.hrw.org/news/2018/12/13/lebanon-stalled-effort-get-syrian-children-school>

[5] Government of Lebanon Ministry of Education and Higher Education [2019]. RACE II Fact Sheet. Retrieved from <http://racepmulebanon.com/images/RACE-PMU-Fact-Sheet-September-2019.pdf>

[6] Government of Lebanon & UNDP [2019]. Lebanon Crisis Response Plan [2017-2020]: Annual Report 2018. Retrieved from UNHCR website: <https://data2.unhcr.org/en/documents/download/70914>

[7] Government of Lebanon Ministry of Education and Higher Education [2016]. RACE II http://racepmulebanon.com/images/RACE-II_FINAL-Narrative_29AUG2016.pdf

[8] UNHCR [2020]. Syria Emergency. Retrieved from UNHCR UK website: <https://www.unhcr.org/uk/syria-emergency.html>

[9] Government of Lebanon Ministry of Education and Higher Education [2016]. RACE II http://racepmulebanon.com/images/RACE-II_FINAL-Narrative_29AUG2016.pdf

[10] Government of Lebanon Ministry of Education and Higher Education [2016]. RACE II http://racepmulebanon.com/images/RACE-II_FINAL-Narrative_29AUG2016.pdf

[11] Human Rights Watch [2016]. Barriers to Education for Syrian Children in Lebanon. Retrieved from

https://www.hrw.org/report/2016/07/19/growing-without-education/barriers-education-syrian-refugee-children-lebanon#_ftn11

[12] Ibid

 Terminology

Ministry for Education and Higher Education

The Ministry of Education and Higher Education [MEHE] in Lebanon oversees the provision of education in both the public and private sectors by supervising the development of curricula and its academic applications, monitoring and enforcing professional and academic standards, and conducting and reviewing educational assessments and standardised tests.

Center for Educational Research and Development

The Center for Educational Research and Development [CERD] in Lebanon is a national organisation charged with the modernisation and development of education, based on educational planning, in collaboration with all nationwide stakeholders and reports directly to MEHE.

Ministry of Social Affairs

The Ministry of Social Affairs [MoSA] in Lebanon holds an integrated development role which includes the provision of assistance to the needy.

Non-Formal Education

Non-Formal Education [NFE] refers to learning that takes place outside of a formal learning environment [a state or private school] but within some kind of organisational framework. The formation of NFE centres has been encouraged in Lebanon as a means of addressing the low access to education and high drop-out rates experienced by Syrian refugee children. Initially, these operated outside of the regulation of MEHE, but the introduction of the 2016 NFE MEHE framework[1] brought them under its oversight umbrella. For its purposes, MEHE describes its policy towards NFE as a service that should assist in the reintegration of children into formal education settings and support retention in public schools. It also specifies MEHE public schools as the primary providers of any Accelerated Learning Program [ALP].

Child Protection Policy

For this paper, we define a Child Protection Policy [CPP] as a document specific to an individual organisation setting out its official regulations regarding the protection of children in its care. This could include the safeguarding of children from violence, exploitation, abuse, environmental harm and neglect.

Safeguarding

For this paper, we define Safeguarding as practical actions [Safeguards] that are taken to promote and ensure the welfare of children and protect them from harm.

Implementation Plan

For this paper, we define an Implementation Plan [Action Plan] as a formal, written and coordinated framework detailing practical actions that should be taken in order to enforce the standards set out in an organisation's Child Protection Policy.

[1] Buckner, E., Spencer, D., & Cha, J. [2017]. Between policy and practice: The education of Syrian refugees in Lebanon. *Journal of Refugee Studies*, 31[4], 444-465.

Methodology

Research Aim

The aim of this assessment is to explore how Child Protection Policies (CPP) in non-formal education (NFE) settings in Lebanon are being implemented, with the goal of improving the understanding of current practices and shedding light on facilitators and barriers to maintaining the safety of children.

Sampling and Recruitment

Interviews and focus group discussions (FGDs) were conducted at 10 NFE centres. The organisations chosen to participate were part of a purposive sample compiled to include centres located in different regions with diverse socio-economic and cultural characteristics. These centres provided services for children of various ages and at different educational stages and abilities, including some with special needs. Syrian refugee and disadvantaged host community (Lebanese) households were a major focus for most of the organisations, however the main criteria for participation were that centres had to offer NFE, be operational in Lebanon and have an official Child Protection Policy (CPP).

All participants received a detailed verbal briefing [by telephone] explaining the assessment, its purpose and what it would entail. Subsequently, a written agreement, signed by a representative of each organisation, detailed the assessment in writing. Once enrolled, the organisation provided a copy of their CPP along with any other relevant supplementary documentation [e.g. Code of Conduct].

Data Collection

All data collection was carried out by **himaya** using trained research staff with backgrounds in relevant areas such as clinical psychology, social work and public health. In-depth interviews were completed at each of the 10 centres with members of the field administration team, and at 7 of the centres with the addition of the Child Protection Officer (CPO), in this context considered to be any professional designated by the organisation to be the focal point for matters related to child protection. Interviews were conducted using a detailed tool made up of 10 different domains featuring both simple and open-ended questions regarding how the CPP is implemented and how centres work to keep children safe in their daily practice. Interviews lasted between 2-3.5 hours and were generally held over two to three days.

Separate focus group discussions (FGDs) with parents and teachers, consisting of between 6-8 participants from diverse backgrounds, were also held at each of the 10 centres and lasted between 30-60 minutes. FGDs with students were only conducted with children aged 11 and above, and therefore did not take place at the 3 centres where students were below this threshold. Interview guides were developed for use in each FGD with the aim of exploring the knowledge participants possessed about the CPP, their perceptions of safety at the centre and their response to any suspected abuse and harm. All data collection took place between April and September of 2019.

Results & Discussion

Child Protection Policy Origins: Firm Foundations?

Exploring how an organisation's CPP came to be is a necessary step if we are to understand everything that came afterwards. When examining the motivation behind the creation of CPPs at the NFE centres included in this study, the influence of international organisations and donor individuals is clear, and for most, the need to satisfy criteria for donor funding or partnerships with international parties was the primary impetus for its creation. Organisation 10's statement that "[A partner INGO] mandates that all partners must have a CPP if they work with children or should adopt their CPP if they don't" was echoed by almost all of the participants, with O2 commenting more specifically that it was "a donor requirement when working with a UN agency".

Only two organisations said that there was existing momentum towards developing a CPP within their own organisation prior to it becoming a donor requirement. O3, for example, which worked with an INGO to initiate and develop their policy, said they "had wanted to have clear expectations from staff on how to treat children [and] had suspected child abuse in their organisation before and wanted to have a clear idea about what to do". O7 made a similar statement that the motivation was "firstly, donor requirements; secondly, we had wanted to develop one but had to seek out expertise in order to make it happen." Apart from O8, which hired a foreign consultant and identified a local NGO for assistance, each of the others upon which [to whatever extent] a policy was imposed received some level of staff training from the outside organisation.

One of those with an existing policy, O10, noted that they "had a CPP before dealing with donors but are applying it more carefully and developing it further following requests from donors". O2 was extremely proud of the fact that their CPP was "locally developed [and] exported" to branches of the same organisation in other countries, with the implication being that leadership on this type of policy from within Lebanon is considered unusual.

The organisations which were clear on the origins of their CPP mentioned that during its development there had been some level of consultation with head

office staff, or, as in the case of O2 and O4, it was solely developed at senior level. While interest and input from the highest level of an organisation can certainly be viewed as positive, consultation with implementing staff and a full understanding of the day-to-day circumstances in which the policy would be applied was absent. Indeed, none of the organisations mentioned the consultation of field staff or service users (parents or pupils) in the development of their CPP.

Despite, or perhaps because of, this uneven consultation, an administrator at O5, which had support from an INGO in adapting a policy issued by UNICEF, commented that the resulting policy was 'westernized'.

In this case, the term was used to indicate his belief that CPPs are being copied wholesale from those used in western settings and are based on western values with a disregard for the particular challenges and social issues in Lebanon. This view echoes research published in 2018 in which CP practitioners expressed frustration with 'western-centric' thinking and a 'cookie-cutter approach', and highlighted in particular the preponderance of reference documents written in English.[1] Indeed, the CPP at one of the organisations included in this study was written so poorly in Arabic as to be unintelligible, suggesting that it was a very badly-executed translation. Similarly, one organisation specified in its CPP that "every...country office is required to have a context-specific Child Safeguarding Policy in place" but, on being asked for their CPP, could only provide the generic version. The CPP of another participating organisation had a section designated for country-specific information, including the relevant government acts, which had not been completed.

The fact that staff are expected to use incomplete and often poorly translated documents would seem to indicate a clear disconnection between paperwork [policy] and practice.

O10 specifically highlighted this disconnection: "The CPP is the same as the one used by the INGO, but the practical implementation may differ slightly at the

[1] Child Frontiers/IKEA Foundation/Save the Children [2018]. The Child Protection in Emergencies Professional Development Programme: Capacity Gaps Analysis Survey – Middle East and Eastern Europe. Retrieved from:

https://resourcecentre.savethechildren.net/node/13221/pdf/2018cpie_cga_meee_word_version.pdf

NFE centre, as its structure is different.”

Concerningly, staff at O4 spoke of their understanding of CPPs as a transient document that is imposed at the request of whichever donor or partner they are currently working with, stating “CP implementation is reliant on partnerships that develop each year”.

At O5 the Director, working in the field, went as far as to question the applicability of CPPs at all as he argued that they are designed for children living under 'normal' circumstances and not refugee children that live in 'worse' conditions. He went on to comment that 'hitting and shouting are not allowed anymore,' but that they are 'tempting when children have no respect for authority and no discipline.'

There were examples of adaptation to make policies more relevant. An administrator at O4 remarked “yes [the CPP] is adapted. It 'goes to the maximum' to protect all children. It mentions all types of violence children could be exposed to.” The CPO at O9 mentioned a specific change that had been made to their policy to confront a perceived problem. “For example, in response to children getting too attached to volunteers [the Centre] added an article that prevents hugging/physical contact etc. between children and volunteers.” However, a participant from O6 said there had been “no review in 5 years”, and administrative staff at O8 and O2 both felt that their policies needed “further development”. O5, O6, and O7 were more negative, saying “[the CPP is] too general” and “not all policy is implemented”.

CPPs vs Implementation Guidelines: Muddied Waters

More often than not there was no clear distinction made between a CPP and any resulting Implementation Guidelines, with almost all centres considering them to be one in the same. This lack of delineation meant that CPPs were expected to list, describe and legislate for all protection rules as well as for any preventative or reactive steps that should be taken. This combined nature also contributed to a lack of understanding around the purpose and format of a CPP, and the misconception that simply having the policies written down was sufficient.

In the absence of standardised Implementation Guidelines, employees at the centres we surveyed looked to the CPP itself to provide any necessary practical instruction on how to implement protection processes or answers on how to respond in specific

situations. This has often led to frustration and misunderstanding. For example, staff at O7 mentioned specifically that “[the CPP] doesn't adequately control relations between volunteers from abroad and children; staff aren't clear enough on monitoring behaviour, [e.g. telling journalists not to take pictures] despite having signed agreement forms preventing this”. Two administrators identified policies and procedures for sharing images of children online and on social media as necessary but lacking, while one administrator said the same about the use of reasonable force at her centre given the recurrent breakout of fights among older children.

While some of the CPPs were relatively brief, others had been added to at length seemingly to compensate for the lack of a separate action plan.

Participants from O1 spoke positively of their particularly detailed CPP, 'the policy has become broader and broader, for example, [our] CPP was 5 to 6 pages and after the amendments it is more than 36 pages. We went deeper into the message of this policy and how to communicate it to children more clearly.’ However, as most employees will only be asked to sign the policy at the point of recruitment, without specific Implementation Guidelines, a CPP of the length mentioned above is highly unlikely to be a practical point of reference for staff.

We found a strong desire for more practical guidance, as specifically highlighted by O9 when participants stressed that it would be helpful to have documents to which employees could refer, including example cases and giving bullet-point guidance. With a clearer understanding of the purpose, and limitations, of the CPP itself and training in how to translate these policies into practical, manageable actions, the majority of centres with which we spoke felt that they would be much more confident in monitoring and enforcing child protection.

The Role of Upper Management

None of the organisations specifically mentioned the involvement of their Board of Directors [or equivalent] in instigating the policy, although full involvement in the approval process was implied. O3 and O6 both suggested a lack of Board involvement in the CPP in an ongoing capacity [i.e. once the policy had been set], however they also highlighted the importance of the 'Director' position in “applying the CPP” and “general implementation”.

O8 did the same, stating that “[the] Director's role is in implementing the CPP”.

O7, O8 and O9 all indicated some form of Board involvement and O9, when asked about obstacles to the process of improving the CPP stated “there are no obstacles, on the contrary, editing the policy [it is assumed this means obtaining sign-off from the Board for changes] is a very easy process.” O8 talked about referral to the CPO, who then writes a report for the Director who takes the call on cases. O6 also mentioned a large degree of involvement from their Director.

Operational Obstacles

While individuals never mentioned specific decisions made at the top of the organisation, the impact of ‘organisational culture’ dominated a number of conversations and comes up frequently in relation to CPP development.[2] Throughout our discussions there were statements made regarding the impact that unwritten values and behaviour have on CP.

A focus on academics to the exclusion of Child Protection

Comments from teachers across all of the surveyed centres suggested that when resources are limited, they are actively diverted to support academic concerns and away from areas that could be considered “holistic”, i.e. child protection, staff training, social support, etc. Those who participated in our FGDs stressed that it was a challenge to secure the time and resources for more detailed sessions or refresher courses on CP (after any initial induction process). For example, at O10 the Admin/CPO stated that ‘teachers do not feel well supported in meeting detection and reporting expectations due to a lack of training and workshops’.

The correlation between safe spaces and better academic outcomes[3] seemed to be well known to the frontline staff we interviewed, which would make their frustration all the more understandable. O1’s FGD participants reflected that they understood that “children feeling safe in the Centre and at home is directly linked to better learning and interaction”, but, as stated by O5, they struggled with “high pressure and not enough time to develop the CPP due to multiple priorities and tasks. In the absence of a protection or psychosocial unit, the focus is only on education.”

A lack of resources allocated to ensuring a safe physical environment

Although in general participants considered their NFE centres to be safe, they still identified various environmental risks. The most common structural concerns included inefficient heating and cooling, slippery floors and stairs during the rainy season, leaks and debris, and a lack of well-sheltered play areas. At most centres, administrators were aware of structural shortcomings but were unable to address them due to lack of funds or the inability to secure a better venue.

In addition to limited financial resources forcing difficult compromises on both building location and structure, other constraints can have a significant impact. For example, in Lebanon there is no system for carrying out any kind of environmental or structural survey prior to leasing a property. In some instances, leaseholders, not landlords, are liable for correcting any faults or making necessary repairs to the property during their tenancy, placing further strain on limited budgets. One NFE centre surveyed was located on the roof of a workshop and was described as inappropriate by the administrators and staff interviewed, with both stating that a new venue was needed but due to lack of funds and the scarcity of suitable properties they were unable to relocate.

For centres providing transportation for pupils, several parents reported an acute lack of resources in relation to bus safety, and during FGDs mentioned a lack of bus assistants as a main source of safety concerns. Staff appeared to agree, with participants from O5 commenting that they were “understaffed so unable to have one supervisor per bus”, and staff at O6 specifically gave the example of being unhappy that there was “no assistant with the evening shift bus when it comes to the school, only when the children are dropped off at home.”

[2] British Overseas NGOS for Development (BOND) [2020]. Safeguarding. Retrieved from: <https://www.bond.org.uk/resources-support/safeguarding>

[3] RT International [2013]. Literature Review on the Intersection of Safe Learning Environments and Educational Achievement. Washington, DC: U.S. Agency for International Development. Retrieved from: http://www.ungei.org/resources/files/Safe_Learning_and_Achievement_FINAL.pdf

Gaps in practical processes to ensure child safety

The evidence of practical processes for child safety within the centres' physical environment varied. There were clear instances of staff doing very good work with limited resources, as well as examples of obvious gaps that could be rectified with a minimum of additional resources. These included:

Fire safety

Only four of the centres surveyed had fire extinguishers available, and only one had a fire alarm. Fire drills were not held in any of the centres interviewed. These indicate that a relatively simple procedure [pupils' safe and organised exit from the building in case of emergency] was being universally overlooked. It must be noted, however, that fire safety and preparedness is sporadic in Lebanon; some organisations have robust safety measures in place, and some do not, so this is not an issue confined solely to NFE centres.



Arrival and departures process

At half of the centres, pupils travelled solely by bus [a service which was directly maintained or subcontracted by the NFE centre] and at 3 centres pupils either took the bus or walked, alone or with parents. Pupils at O6 and O9 walked [alone or with parents], and the latter was the only one to specify that children under a certain age [5 years] had to be accompanied.

At all centres apart from one, teachers welcomed pupils, sometimes with another member of staff [the Director and Registration Officer were mentioned]. O6 said that the building caretaker "opened the door early" for any early arrivals. O10 specifically mentioned that once, when the bus driver was early, he waited with the pupils until teaching staff arrived.

Four centres [O1, O2, O3, O7] confirmed that it was their policy that children were not allowed to leave the bus without a parent present to accompany them home, and some stated that in the event of a parent not meeting a child off the bus, the pupil would be driven back to the centre. All organisations said that they would call the parents of an uncollected child while a staff member waited with the pupil, and O9 suggested that staff members would call the family and drop the student home themselves if necessary, but only if a parent was home to meet the child.

Toilet-taking procedures

When covering the question regarding 'supervision', six centres specifically mentioned supervision or assistance for children in the toilets. Some stated that older children go by themselves, although there were conflicting accounts regarding this practice from O10. The Admin/CPO stated that "[There is a] helper in the bathroom, especially for the younger children", but in the staff FGD it was stated that "[there is] no bathroom assistant, but older children enter alone while young children enter with their parents usually".





Register of attendance

All centres took a daily register of attendance and almost all [barring O6 which did not answer this question] mentioned a policy of follow-up for non-attendance by placing a call to parents, which generally occurred from 3 days to a week after the absence. O1 contacted parents on the day of the absence.

First-Aid

All of the centres surveyed had a full first-aid kit as well as on-site staff trained in its use.



Recording medical conditions (including allergies)

Eight centres had some system for recording pupils' medical conditions, such as allergies and physical limitations, although only one specifically mentioned that these notes were kept in a secure location.

Procedures for taking pupils off-site (school trips)

Eight of the centres offered school trips. Of these, six required prior parental consent, two mentioned the importance of obtaining emergency contact numbers, four mentioned a supervision ratio and three required a risk assessment to be undertaken before the trip.



A lack of defined Whistleblowing Policies for staff

Four of the Administrators surveyed stated that their organisations had a channel for employees to anonymously report misconduct or that staff were encouraged to report misconduct in general. O2 was the only organisation that mentioned a defined Whistleblowing Policy, but the interviewee said that "no one read it". The problems in reporting staff misconduct were highlighted by a participant from O4, who stated that "people are reluctant to report if they notice misconduct committed by colleagues, because everyone will know it was them that reported it." A Coordinator gave a personal example in which she reported to the Director that a teacher was hitting a child, only for the teacher in question to find out and react violently.

The lack of defined policies related to staff bullying appeared to exacerbate this situation. O5 and O6 were the only ones with set rules around the issue, with the others stating either that the policy "doesn't say" or that "[staff bullying] never happened, if it did it would be added to the policy" [O9]. It seems reasonable to suggest that the general lack of a robust policy and/or knowledge of policy might lead to a culture of staff turning a blind eye to improper behaviour by colleagues.

Inconsistent staff recruitment practices

The organisations surveyed generally had very similar recruitment process, involving advertising the post,

screening CVs to shortlist applicants, then holding two or three interviews with promising candidates. Most Administrators said that their organisation did not mention having a CPP or stressing CP in job advertisements, with one participant from O1 questioning its applicability when hiring unskilled labour: "If the employment announcement is for unskilled labour, such as cleaning workers, we do not mention the CPP in the employment announcement. We only promote the protection policy in positions where it will be most relevant." This arguably lax approach to Child Protection, in which it is not applied to every staff member who comes into contact with children, is also reflected in the CPPs of O7 and O8, which do not state their relevance to subcontracted staff such as bus drivers. In comparison, the CPP of O5 states "this policy applies to...anyone working on behalf of [O5]" and O10 specifically mentions that it applies to third-party contractors.

Each organisation required all new staff to sign an employment contract, their code of conduct and CPP. Administrators from nine of the centres said that new staff received training on CP implementation as well as detection and referral of abuse during their first year of work. Five of these organisations relied on INGOs or local NGOs for staff training, meaning that for some hires the timing of the Child Protection training courses depended largely on the partner. Half of the centres held training for new staff on

implementing the code of conduct while the other half relied on meetings and inductions to explain expectations.

At eight of the centres, judicial records were requested for new hires, as per Lebanese labour law. However, it was noted that it was not possible to get a judicial record for Syrian teachers, as the law prohibits them from officially being employed in this capacity. [It must be stated that this particular circumstance raises a host of its own issues and complications, which cannot be explored in this particular study.]

In relation to obtaining the relevant documents, such as references or a complete CV, during the hiring process, an administrator from O3 said 'identification and teaching qualifications are [the only things that] we ask for because we are friends and know everything about each other'. Administrators at O5, O6 and O8 similarly mentioned that they did not check references. The Administrator at O4 said that references were only checked for some positions.

None of the centres externally reported staff misconduct or dismissals, meaning that former employees who could pose a danger to children regularly moved on to new roles elsewhere. An administrator at O10 commented that "the same person [we] reported for exploitation worked in another INGO a year later. At [our] Centre, we were going to hire someone for their qualifications and impressive profile until another employee told us that the candidate had been previously let go for misconduct."

Staff Obstacles

In addition to, or in most cases because of, the operational obstacles discussed above, the staffing situations at the centres we surveyed often further complicated or even directly hindered the effective application of their stated CPPs. The most common issues were:

An absent or ill-defined CPO role

When exploring the impact of a full-time, dedicated CPO on centres, it became clear that the absence of this position and/or a lack of understanding around

the job remit itself presented serious issues. On a practical level, for most centres a CPO was never a stand-alone hire, with common practice being to ask professionals with a psychosocial background [psychologists, special needs teachers, social workers] to take on this role.

We conducted interviews with CPOs in seven out of ten organisations (conducted independently, apart from at O10 where the CPO chose to be interviewed jointly with the Administrator), and the reasons varied among those not attending. O5 said there was "not enough funding to hire a Psychologist or Social Worker or a Child Protection specialist" and mentioned that this was a hindrance to their ability to adequately deal with Child Protection issues. For O4, the CPO was also the PSS Coordinator at their central headquarters and, as with the CPO at O6, they did not accept the invitation to participate (one was abroad and the other was unavailable at the time). Examining the working locations of the CPOs, only three were based at the centres in question for any part of the week (3 or 4 days) and most of the rest mentioned only occasional visits.

While the Middle East has a high number of tertiary educated professionals, it has been observed that capacity has not been fully capitalised on nor leveraged sufficiently to enhance the skills needed for sustainable service provision or for strengthening systems in the long-term.[4] It is possible that those with the appropriate degrees are not being sufficiently supported (e.g. by conversion training) to refocus their skills or to transition their existing in a new direction. We found that those holding CPO positions in the centres we visited possessed a solid academic foundation as a result of their tertiary education (for example, a background in law or social work), but frequently mentioned a feeling of unpreparedness to practically execute the role. A member of staff at O2 commented that "university did not prepare [them] for Child Protection issues", while the CPO at O8 mentioned that "[they] relied on partner organizations for capacity building, such as UNICEF, himaya and a volunteer consultant" and that they would like "more opportunities for training on case management and referral, especially with older children".

[4] Child Frontiers/IKEA Foundation/Save the Children [2018]. The Child Protection in Emergencies professional development programme: Capacity gaps analysis survey – Middle East and Eastern Europe. Retrieved from: https://resourcecentre.savethechildren.net/node/13221/pdf/2018cpie_cga_meee_word_version.pdf

The only mention of the involvement of a centralised protection team [i.e. more than one individual working in the area of child protection] came from O7, with the other centres surveyed seemingly relying on one individual, either located at the centre itself or at head office. This might suggest a lack of staff allocated to this area within organisational headquarters [which, it should be emphasised, was the origin of the CPP document in most cases], but it may be that because this study focused mainly on the Child Protection structure at the centres themselves centralised teams existed but were not mentioned.

When examining the relationship between CPOs [the majority of whom, as stated above, were based at the headquarters of the organisation] and their colleagues in the field, most field staff were positive about both the role and its value. During one FGD,

participants from O7 said “having an active Social Worker as a reference point [helped with detection] ...the Social Worker and Admin take Child Protection concerns seriously”. Similarly, staff at O8 said they “feel supported by the CPO and Admin” and that “teamwork acts as a facilitator for detection.”

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Teacher Capacity and Confidence

Teachers at the majority of centres reported a lack of confidence in their ability to carry out Child Protection work, which they attributed to a lack of training. For example, teachers at O10 mentioned that they “did not feel well supported in meeting detection and reporting expectations due to a lack of training and workshops” and those at O8 suggested “more activities for teachers and parents should be organised by external NGOs”.

After analysing the comments and comparing data collected from other sources, while the quantity of training presented itself as one possible roadblock preventing them from effectively carrying out their role in the Child Protection process, additional themes also emerged:

Uncertainty about when to report

Staff at all but one of the centres mentioned feelings of uncertainty around the necessity of verifying a child’s statement. A teacher from O6 explained that she monitored a child over a few sessions to ensure that the signs she was seeing weren’t a one-off and added that there was a concern over the “uncertainty of the claim and thinking that the feeling isn’t repeated”. Similarly, discussions at O3 saw teachers mention “uncertainty on when to report”. Uniquely, staff from O9 stated with confidence that “teachers monitor the child and record any changes in behaviour or attitudes, or any suspicions, using a reporting form which is then sent to the CPO”. The same staff suggested possible improvements such as “teachers should fill in a form that has indirect questions which would help to verify accusations, as the challenge lies in the difficulty of confirming incidents based on child’s accusations and witnesses”. Notably, the latter comment implies that teachers are expected to verify abuse at some level.

Looking at the CPPs, only one [O2] clearly emphasised that “no staff member shall be penalised for reporting a suspected incident of abuse when it is later to be discovered to be false, if the reporting is done in good faith.” By contrast, the wording of the other CPPs generally confers rather more emphasis on the teacher’s abilities, such as “ensuring that all staff...are alert and able to recognise signs of abuse” [O4]. In general, discussions with organisations included in this study suggested that an undue burden was placed on teachers in this regard. Whether real or perceived, this indicates a lack of training as to where the role of teachers begins and ends in the reporting process.

Confusion around respecting 'cultural sensitivities'

Every CPP had a statement alluding to its relevance to 'all children' and most had a specific equal opportunities statement, with many using the UN Convention on the Rights of the Child as the basis. Despite this, a teacher at O3 said that she found it "challenging to discuss the CPP while respecting the culture of parents" and a colleague agreed: "we can't discuss the CPP in detail with parents because it's a sensitive topic in relation to discipline and many of them may not accept this kind of conversation, which will reflect badly on the child." Similarly, at O4 a teacher commented that "it is also very cultural, violent discipline and corporal punishment are...social norms".

A similar attitude was expressed in relation to external contractors. A teacher from O10 gave the example that "one of the bus drivers married a 17-year-old girl, which is not allowed according to the policy, but the NGO did not fire him." The participant describes this as a dilemma as the driver is applying cultural practices that are not against Lebanese law or the individual's religious beliefs, but instead contravene an organisational policy. In this instance the challenge of implementing a CPP goes beyond just situational adaptation and crosses into the realm of attempting to challenge accepted cultural norms. "It was seen as harsh to fire the driver," she said, "and this is an example of the difficulty in changing the way people think."

Staff at O3 commented that "there is a cultural and environmental barrier" to their work in promoting child protection, which leaves them struggling to enact any real change. While this argument might be pervasive, it is important to remember that violence is not a cultural construct and is not exclusive to any one demographic. Our findings suggested that some teachers felt powerless to prevent violence against children in the face of corporal punishment at home, which is considered in some contexts as being culturally acceptable. There was also a prevailing impression amongst some teachers that the stressful conditions in which they live in that might make parents more aggressive and emotionally volatile. The fact that either of these two beliefs might be viewed as 'barriers' to reporting violence in the home shows that CPPs are not always succeeding in enabling or empowering staff to simultaneously 'understand the context' whilst also refusing to accept violence as an inevitable part of the lives of the children they serve.

A lack of visible follow-up and outside support

The vast majority of organisations specifically mentioned making external referrals for Child Protection cases, but many CPOs and administrators complained that once the matter is out of their hands it can be discouraging to see little or no movement with a report's progression.

While this paper cannot draw conclusions as to the strength of the Lebanese systems of external referral for child protection cases, it is clear that better guidance is needed for staff in relation to this issue. Staff at O3 reported being unsure as to what happens after a referral is made, and a FGD participant with O1 said there was "a lack of post-policy, for example when considering a specific case that has been reported, we do not see the appropriate follow-up". A staff member at O10 commented that MoSA "can be slow to comply and are extremely difficult to contact with queries or concerns, while UPEL are overburdened, so sometimes respond but many times don't".

During staff FGDs, a significant amount of time was spent discussing the general living situation of refugee children as well as the conditions in public schools, and it was clear that most staff felt that violence in both home and within schools undermined their efforts. This seeming lack of control and inability to change factors outside of their own environment was extremely demotivating and sometimes contributed

to a feeling of futility in this area of their work. Typical statements included 'if the child is hit by their parent, we have no power to intervene' and 'we tell the child that nobody should hit you but then they go home and their parents hit them.'

There was also a feeling from most staff interviewed that the families they encountered were somehow less able to parent their children and were not as engaged as they should be in their child's education. Statements such as 'many parents don't show up to the centre' were typical, although staff at O9 went further when asked if parents should have a role in contributing to a CPP. 'Should parents have a role in improving the policy? To be honest, no. They act in the exact opposite way to the policy so I can't rely on a parent's opinion, who thinks that hitting children is an okay thing to do, in improving a policy that is meant to protect children from violence.' Statements from several teachers suggested that they considered the values they maintained about education and parenting to be different to those held by parents, which could feasibly hinder communication between these two stakeholder groups.

On a positive note, one member of staff at O4 remarked during a FGD that 'six years ago children would get hit by their parents much more than today. This change can be related to the Centre always following up on signs and parents attending parenting sessions where they tend to feel guilty about using violence once understanding its effects.'

Parent and Pupil Perceptions

It is generally accepted that a functioning child protection system is informed by children's own views and experiences and strengthens families in the care and protection of their children^[5], and this view was reflected in the CPPs of the six organisations that specifically stated that parents and pupils should be educated about the CPP. However, it was apparent from FGDs that the vast majority of parents and children were unaware of the CPP at their NFE centre, and those that were aware were unsure about the content. Staff knowledge of, and leadership on, provision of educational activities in this area was also patchy.

It was common for parents to be unclear as to the meaning of the term 'child protection', with one parent at O2 stating that "child protection is variable as every mother sees it differently depending on her child's needs." When asked what they thought the CPP was, most parents and children replied that it meant staff at the centre did not use violent discipline with children and that staff hastily intervene to prevent bullying and resolve fights between students. With the exception of three parents and one group of children, no participants recognised the relationship between the CPP and reporting harm and violence in order to receive

support but, when probed, most participants said that they might report violence or harm to someone at the NFE centre. Taking this one step further, and highlighting the importance of educating parents and children on the specific processes around Child Protection, parents in one FGD commented that they had "no idea how the organisation deals with suspicions of abuse and how it responds to them" and "no idea how the centre would respond if a parent is suspected of harming a child". One parent suggested that the centre could refer the family to a psychologist, and another claimed that "the organisation, namely the Director, reacts to issues... but solutions are temporary and partial."

Looking at pupil responses, only one participant was aware of the existence of something called a Child Protection Policy, or anything resembling it, at their organisation, but encouragingly this was because they had been informed about it in class. The rest had a good guess as to what it could possibly encompass suggesting "protection from violence" of some kind, in or out of the classroom. One interesting comment came from a child at O9 and might reflect one of the primary concerns of this age-group. His interpretation of a policy that would keep children safe would be something that

[5] UNHCR [2010]. The Systems Approaches to Child Protection. Retrieved from: https://assets.publishing.service.gov.uk/media/5c6edc11e5274a0ec72b4881/399_The_Systems_Approaches_to_Child_Protection.pdf

'[protects] children from child labour by asking parents to register their child in school instead of sending them to work.'

Participants in two of the pupil FGDs commented that they had heard of the existence of a Child Protection Officer at their centre and the rest readily gave examples of staff members they would approach if they had a problem. However, concerning statements were made in the course of the discussion by participants from O3, with the children first saying that they would report harm/abuse to an outside Child Protection organization, indicating that someone at their Centre would not be their first choice. Children from O10 also said they would not seek help at the centre for violence at home or on the street, although some said they would 'contact himaya directly' [whether children were aware of himaya through advertising [e.g. posters at their centre] or simply through their presence at the FGDs was unclear]. When probed, they said they would tell someone at the NFE centre if necessary, which indicates that although the facility for reporting was not something they had considered, or been informed of, they had at least enough trust in the institution to feel that they might report an incident if the situation arose. When asked if they would report harm that happens at home, a common response was 'family problems don't leave the home'. Multiple children said they would prefer not to share 'the secrets of the house', and when asked if they would tell an adult if their friend was being abused at home the children agreed that this wouldn't be appropriate as it is a 'childhood secret'.

Similarly, the majority of participants from O9 responded that if the source of harm was their

parents they would not tell anyone, or at most would talk to a friend or a sibling. When probed on whether they would tell the CPO children said they would be scared to do that as they might get beaten more at home and they questioned what they could do. Children generally reported that they would not be comfortable approaching the CPO if they were in a situation where their parents were abusing them.

Encouragingly, some participants did report positive outcomes from approaching Centre staff for help. At O1 a child said that when an incident is reported 'the [staff member] usually speaks to [the pupil] and tells them that they will solve the problem'. One child at O3 reported that 'my dad used to hit me but then [my teacher] spoke to him and he stopped'. Another said, '[if something happens on my way to school] I don't like telling my mother, I prefer to tell someone here [at the Centre] because they are more understanding. My mum gets scared and stops me from going out and stuff'.

The views of parents and pupils on this subject were, in some instances, in conflict with those expressed by staff. For example, the CPO/Administrator at O1 mentioned sessions for pupils to 'introduce the CPP in a fun and simple way,' and O10 stated that they held 'awareness sessions on types of abuse and what to do when facing harm/violence'. However, given that education on the subject of CP was mentioned in the CPPs of six organisations, staff confidence in this area was very patchy and making this possibly one of the most clear-cut examples of policy not translating into practice.

Implications for Policy and Practice

The findings of this study carry potential implications for both policy and practice for NFE centres and their institutional funders.

	STRENGTHS
	All staff showed dedication to, and concern for, the wellbeing of the children in their care
	All organisations provided some form of CP induction training for new staff
	Field staff generally had very good opinions of the administrators within their organisation
	All teachers wanted to do their best to keep their pupils safe
	Good practice was evident, and there was a strong desire for continuous improvement
	A majority of parents and pupils indicated that they would approach staff with a safety concern and were generally confident that effective action would be taken

	CHALLENGES
	Often the interpretation of policies differed between teachers and administrators at the same centre
	There was, across the board, an inadequate amount of resource for implementing child and environmental safety
	Many teachers weren't confident to explain to parents their organisation's Child Protection policies and practices
	Misinterpretations of policy sometimes led to extreme reactions, such as banning any physical contact between staff and pupils
	A lack of continuity in procedures meant that field staff often felt policy would always 'change with the next funder'
	At every organisation surveyed, teachers felt uncertain as to where their role in Child Protection ended, leading to distress if they believed that they hadn't 'done enough'
	While there was a strong emphasis on PSS in every organisation, this was often almost to the exclusion of the practical aspects of ensuring and implementing CP and Health and Safety
	When presented with situations of abuse, some teachers initially showed a tendency towards 'victim-blaming', assuming that the child must somehow be at fault

Recommendations for Future Action

Clearly there would be some value for children in improving education around violence in the home ['domestic violence' in the truest sense of the term, not limited to conjugal violence], their personal rights, and where they can turn for help. The strengthening of external reporting systems would also be advisable, albeit with the caveat that staff must be aware of where their role must end. However, it is clear that the intricacies of the issue stretch far beyond what a policy, or those tasked with its enforcement, are capable of surmounting.

Hence, again, the unfortunate need to focus on "fixing the fixable".



Donors and Partners

It is recommended that donors and partners insist on an adequate portion of the budget of any project being devoted to the proper preparation for, and implementation of, Child Protection. On a practical level this might include funding the salaries of a CPO and Social Worker for the duration of the project, meeting the cost of improvements to physical safety [e.g. the purchase of fire extinguishers] or subsidising staff training. Unfortunately, a fear that donors will not want to see these budget lines on grant applications is ingrained in many organisations, and it will take funding partners showing their openness to these costs in order to change this attitude.

The short-term nature of some funding means that often there is little investment in infrastructure. Although this could be a big ask of donors, it is suggested that it might be worth including a prorated amount into these budgets, or that organisations consider seeking funding specifically for Child Protection-related infrastructure projects.



Teachers

Teachers who receive a disclosure of any kind, let alone a particularly harrowing statement, are understandably concerned about the referral system. Many worry about what happens next after they refer to the CPO or directly to MoSA or himaya, and some reported feeling discouraged when it appeared to them that no follow-up action was taken. It is imperative that Teachers are confident in their knowledge of what pupils can expect if they make a disclosure as well as in where their personal role in the process ends. Providing no confidentiality is breached, there should be appropriate

communication between the Teacher and CPO regarding case progress, allowing Teachers to have some level of closure.

It is suggested that Teachers be given a quick reference document to remind themselves of how to react to a disclosure [e.g. they cannot promise confidentiality, cannot investigate/can only refer, etc.] and clear guidance on distinguishing between urgent and non-urgent cases. There should also be some way of managing pupils' expectations as to what they can expect from the process [e.g. timescale and reaction], if only for the teacher's own peace of mind.

Teachers reported feeling the need to delay reporting minor incidents in order to 'check for a pattern', which had a knock-on effect on their confidence to make referrals as they felt an undue responsibility to prove veracity. It is suggested that a clearly defined paperwork system for reporting minor CP concerns to a central point [ideally the CPO] who can then take the responsibility for tracking patterns would help to alleviate this issue. Here, again, marking the end of the Teacher's responsibility seems key.

Teachers must feel empowered to clearly and confidently state the expectations of their organisation to parents. They must feel that parents have been adequately informed that their NFE centre is one which will teach pupils that things such as child labour, early marriage and domestic violence are wrong, and should not feel tentative in doing so for fear that a child will be punished at home for repeating what they have been taught at school, or have misplaced concerns over offending a perceived 'culture'. Teachers must also be reminded to manage their own expectations about the extent that the Child Protection standards and teachings of their NFE centre might be contradicted by home environments and public schools.



CPO

Ideally organisations would employ a CPO as a stand-alone position. However, as many are unable to do so, a more feasible step forward might be allocating more resources to training for the assigned postholder. Through this study we have also seen the benefit of having a CPO based onsite rather than at the organisational headquarters or at another centre,

and would strongly encourage this step if at all possible.

The CPO should be accepted as the recognised source of expertise and assistance for anything relating to CP, and in order to effectively carry out their role should be trained specifically in areas such as government and local legislation, child welfare and rights, and the practical application of child protection guidelines. It is important that CPOs are assisted in creating and disseminating information regarding CP procedures and in forming robust working relationships with organisations to which they can make referrals. Maintaining open and clear communication with Teachers and other staff members, whether regarding their role in CP or the status of any referrals they might make, will significantly increase staff confidence in this area and help to manage Teachers' stress and expectations.



Upper Management

Just as much as the responsibility for implementation of policy rests with staff on the ground, the job of setting, monitoring and enforcing policy should begin

at the highest level. This is not to say that it should not be a collaborative process, quite the opposite in fact, and Field Staff should be closely involved at every stage. However without senior level acceptance of CP as a priority, and an awareness of the role upper management play in setting and influencing organisational culture, progress in this area will remain limited.

With the shift towards requiring a CPP as a condition of funding, organisations would be well advised to invest adequate time and resources into developing their own stand-alone policies and practices rather than waiting until it is imposed upon them. By taking ownership of their own CPPs, organisations can confidently meet the requirements of international donors and maintain their own consistent policies and practices regardless of any change in partner.

There must also be a recognition that without practical implementation, CPPs are merely expressions of best intentions. This requires the dedication of adequate support and resource, as well as the will to follow through at all levels, and should encompass everything from structural safety and emergency preparedness to safer recruitment and consistent enforcement.

Conclusion

Looking back at our central question, was 'policy translated into practice'? Sometimes. The comments made about CPPs, their origins and practical use suggest that this might have been as much to do with the talent, dedication and experience of Staff as the existence of an official policy. Further attention is certainly needed, but it is vital that there is clarity around what this actually means. More consistent documents and an increase in oversight are typically the first response of NGOs seeking to address the challenge, and while useful as an end point they do not get to the heart of what is fundamentally lacking. How do we universally define terms to ensure understanding and avoid misinterpretation? How do we shift focus from creating an indemnifying policy to engaging in useful action? How do we ensure that Child Protection and Safeguarding are budgeted for at the same level of priority as facilities, staffing or reporting? The sector has for some time been seeking to construct a safe space without first laying these important foundations.

The dedication and commitment of the vast majority staff included in this assessment was exemplary. Teachers and Administrators worked together with purpose and mutual respect to ensure the well being of the children in their care, and consistently showed a desire for further improvement. Undeniably there were also clear-cut examples of significant gaps in safeguarding preparedness, such as CPPs being marginalised, hastily prepared and referred to dismissively. Still, the evidence that Staff on the ground were attempting to mitigate these shortcomings by adapting the documents themselves to be more useful or to provide essential practical guidance shows that it is not the will that is lacking, but the resource. This gives us every reason to hope that with a coordinated effort by in-country organisations, international funders and local and national oversight bodies this is one area that falls within the 'fixable'.

In light of this, how do we, as a sector, move forward? This report shows that if progress is to be made it will not be by issuing updated versions of the same policy and hoping for the best, but instead will require a fundamental, but hopefully immensely do-able, shift in approach. Listening to staff on the ground so that there can be more teaching than telling, and considering more fully the culture in which projects operate so that training and guidance come from a place of understanding and cooperation will be key to both implementation partners and INGOs. Funders should lead by example so that the ones requiring increased safeguarding are also the ones financing it. Their responsibility in this area also cannot responsibly end with the writing of a cheque, but must extend to taking an active interest in verifying CP is happening, prioritising practical improvements where necessary and ensuring that any training provided succeeds in its aim of ensuring policy is translated into practice.

There was a general lack of confidence amongst CPOs and Teachers in carrying out the CP aspects of their respective roles. It would be easy to blame a lack of instruction, and while this is a possibility, we do know that at least some basic CP training was happening at every organisation surveyed. This study would propose that the issue is to do less with training than with understanding. We noticed a

heavy emphasis on PSS in training sessions, but a sense of confusion as to where CP began and ended. This seemed to place teachers under pressure to fulfill the role of counsellor, psychologist and social worker without the practical tools to succeed. One begins to feel that the intensified focus on PSS was happening whilst no one was checking that the school door was locked or that a member of staff was free from a criminal record.

To an extent, we would argue that a CP Implementation Plan should be less involved with the personal and, however possible, reduce a staff member's role in its execution to a set of practical actions. In doing so, CP would be not an open-ended request which depends on the improvement of a child's condition outside of the centre, but a set of practical steps to ensure that in any given scenario a child has the best chance of staying safe. Of course, there is no way that any Teacher could fail to be emotionally invested in a child's emotional well-being, but there must be a sense that it is possible for them to succeed at their job by fulfilling a clear-cut set of practical actions. Perhaps ironically, it seems likely that this approach will make them more, not less, likely to help in that staff have the ability to follow the policy to the letter because it has been made possible for them to practically do so.

PRACTICAL GUIDES

A Practical Guide should serve as a compliment to an organisation's Child Protection Policy, providing a template for the concrete, day-to-day actions that translate safety as policy to safety as reality. While the actions below might seem obvious or small-scale, in our experience attention to this type of detail [meeting bus drivers, checking access to bathrooms] is frequently given little priority, with potentially devastating consequences. Organisations so often stress that Child Protection is the responsibility of all staff, and the vast majority of those working in these environments are deeply committed to doing whatever they can to keep pupils safe, but lack the concrete tools to help them. By providing practical actions that can easily be performed by any staff member, a guide such as this should be an integral tool for centre managers as well as anyone assessing the effectiveness of a supported programme [donors, inspectors, etc.].

The aim of these documents is to provide adaptable guides for the necessary, practical steps that should be taken in relation to ensuring Child Protection in NFE settings. While they have been designed to be useful documents as they stand, they are not meant to serve as proof of legal compliance, and are not tailored to any specific Child Protection Policy. They should be used as an informed starting point and tailored to fit the specific criteria of your particular centre, governance structure, and legal and governmental regulations.

PRACTICAL GUIDE FOR FUNDERS



Intended user

This guide has been designed for use by a team member working outside of the NFE setting (e.g. at organisation HQ) or a representative of an external organisation (e.g. donor organisation, oversight body).



Intended frequency of use

The ideal frequency of use will ultimately depend on specific factors such as the type of centre, frequency of changes in personnel or venue, etc., but in general it is recommended that checks are carried out approximately twice a year during term time.



Intended timescale and location

Again, this will vary depending on the centre set up and the reviewer, but it is recommended that at least one full day is spent at the NFE centre in question.

It is recommended that any relevant reference materials be obtained in preparation for the visit, including, but not limited to:

- A list of all staff with accompanying photos ['staff photo list']
- The name, contact details and brief job description of the Centre Coordinator or equivalent
- A map of the setting (if available), including areas designated for use by specific personnel only, drop off and pick up locations, emergency evacuation routes, etc.
- A daily timeline of events
- A copy of any relevant documents such as the Child Protection Policy, Safeguarding Guide, Staff Code of Conduct, etc.

In order to make the best use of the time allocated, it is important to divide activities based on criteria such as:

- Time sensitive activities (witnessing drop off and collection, etc.)
- Any members of staff who need to be present and their availability
- The availability of documents or observation of specific processes (register for the day, parents being contacted to check absences, etc.)

For clarity and ease of use, the following suggested checks have been grouped by basic criteria but, as with all features of this guide, may need to be amended to fit the particular setting or structure of the centre in question. It is suggested that the following actions be placed in chart form, and next to each space should be allocated to record the name of the individual making the check, if the action was possible, when it was carried out, notes and observations, etc. The headings below are offered as an example:

Reviewer	Action	Associated document/ staff member	Time/ place	Notes/ comments
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Time Sensitive

Arrivals and Departures

- Greet [or introduce yourself to] one of the bus drivers and a bus assistant; ask to see bus driver's list of learners
- Observe how the children come off the bus and if the process is safe [e.g. check for trip hazards, pushing etc.]. Do younger children and/or children with special needs get the help they need?
- Record where the children go upon exiting the bus. Is it where you expected? Are they together? Are they supervised?
- If the children exit the bus and go somewhere other than their classroom, how are they moved on from this point? [Checking supervision and safety as above]
- If parents drop pupils off, which member of staff is present to greet them? Does the parent wait with the child or are they placed under a staff member's supervision?

Registration and Absence Checking

- Watch a teacher take the [paper] register, and follow it as it travels to the member of staff who follows up on pupil absence. When does this happen? Is it a smooth process?
- Greet [or introduce yourself to] the member of staff who follows up on pupil absence. Ask them how they contact parents to check all absences are accounted for. When does this happen [daily, weekly, etc.]? Do they have good contact details for every parent at the centre?
- Identify the staff member[s] responsible for supervising bus and 'parent departures' [pupils who will be collected by parents, i.e. not travelling by bus] at the end of the session.
- Follow the register back to the staff member[s] responsible for pupils' departures
- At the end of the session, watch pupils line up in their classrooms, their names marked off the register, and depart. Make special note of how parent collections are managed.
- During lessons: Note when the Main Gate is locked and opened
- During lessons: Note when the Guard's hut is occupied- is anyone else coming and going?

During the session

- Note when the Main Gate is locked and reopened.
- Note when the Guard's station is occupied. Is anyone else coming and going?
- Note any visitors to the centre. How are they greeted/badged/accompanied?
- How do pupils visit the toilet? Are they accompanied and if so, by whom?

Not Time Sensitive



Toilet facilities

- Note the condition of toilets and basins [cleanliness, provision of soap and dryers, hot and cold water, etc.] and any access issues [uneven steps, poor-quality tiling on floor, lighting]. Are the toilets adjacent to the handwashing facilities?
- Are the toilets outside or require pupils to leave the main building? If so, can they be accessed safely [are all entrances/exits secured] and can they be visited alone or would pupils need to be escorted?
- Which toilets are assigned for older pupils and which are for younger children [if younger children are always supervised this may not be a safeguarding issue]? Are these split by gender and is there appropriate signage?
- Which toilets are assigned to staff? Are these split by gender and is there appropriate signage?
- How do pupils get from their classroom/playground/eating area to their assigned toilets? Which member of staff supervises at each point in the day and are they qualified to do so [safeguarding trained, etc.]?
- Annotate the map with the designation of classrooms and toilet facilities; date this document noting that it might change in the future.



Visitors and Security

- Review the staff photo list while on site. Who is present/absent? Are they generally where you expected them to be [i.e. does the list look accurate and up-to-date]? Are their photos accurate? Do staff wear any form of ID?
- Do contractors and/or visitors need to sign-in and/or show any form of ID? How are they supervised while on site?
- Are security cameras used? Who has access to the cameras and footage? Do they store video, if so, how and what are the laws regarding this in the locality/country?
- Is contact information for an independent supervisory body clearly and prominently displayed/available for parents to anonymously provide feedback on staff? If a parent wanted to complain about the conduct of a member of staff, how would they do this confidentially without raising concerns over jeopardising their child's place at the centre?

+ First Aid

- Is there a first aid kit and/or accident book? View these and ask to be taken through the accident response process.
- Is there a trained first aider on site? Are staff allowed to give children medication [both prescribed and over the counter]? How is an accident/injury communicated to the parent?

Health and Safety

- Are the kitchen and staff room doors closed? Could a child access appliances like a hotplate, kettle or toaster?
- Are windows properly secured if at child-height? How are they made safe if they need to be open for cooling/ventilation?
- Is there a covered playground area to protect pupils and staff from the sun? If equipment is used, is there an appropriate floor covering? Is the environment appropriate for safe play [are there dangerous steps or uneven paving, etc.]?
- Is cleaning equipment kept secured when not in use and who has access?

Food Safety

- If food is bought in by the centre to be provided for the pupils, is there a designated storage/prep/distribution space which is kept clean and has handwashing facilities nearby?
- If so, who has access and how is it monitored?
- Talk to the Centre Coordinator or equivalent about where the food is purchased. Is a food hygiene certificate available? Have they personally visited the supplier?
- Observe whether children bring in their own snacks. What type of thing are they bringing? Does the centre have any allergy guidelines?

Document and Data Storage

- Ask to see examples of standard procedural forms, for example the new pupil Intake form, an emergency contact details form, transport liability sign-off, etc.
- Ask for an [anonymised] example of a child's record, displaying things like record of work, attendance, etc.
- How are records kept? Are they solely paper/ digital/ both? Who has access and when? Who can request and view records and how is this monitored?
- Are staff and pupil records kept separately?

PRACTICAL GUIDE FOR MANAGEMENT AND STAFF

Intended use

The following is a template example of some of the main categories, and the actions within them, that centres should consider when developing their own implementation procedures. It has not been designed to be comprehensive, and should therefore be used only as a guide to provide a starting point for each individual organisation to create their own specialised and tailored guidance.

Oversight

While there might be one individual with overall responsibility for the centre, the practical aspects of this guide should be broken down into manageable elements, performed by specific members of staff and reported on in a thorough and timely way to the Centre Manager. Staff members should be clear on the role they play, the procedures they must follow, and how best to use their own judgment and initiative. Records should be kept and regularly reviewed, if possible, by an independent party.

For clarity and ease of use, the following have been divided/ grouped according to common administrative categories but, as with all features of this guide, may need to be amended to fit the particular setting or structure of the centre in question.

Policies and Procedures

Action	Responsibility	Involvement
The Centre maintains its own CPP, independent of any document that a partner/funder might wish to impose	Head Office	Management as well as Implementation Staff
The CPP is based on international guidelines and best practice, is created in consultation with both management and ground staff, and is fully explained to and understood by all members of the organisation	Head Office	Management as well as Implementation Staff
The CPP is not created or considered to be, both administratively or in practical practice, an all-encompassing document combining CP policy and practical practice	Centre Management	Management as well as Implementation Staff
Separate guidance is created to outline practical CP implementation, and is tailored to meet the specific needs and characteristics of each location	Centre Management	All centre Staff

Record Keeping and Reporting

! Note- Suggested chart headings have been listed at the beginning of each category.

Pupil Records

Suggested chart headings:

Record	Responsibility	Access	Location	Review
Full name	Office Manager	Management/ office staff	Database	Annually

Categories to record:

- Full name [with a consistent spelling used throughout]
- Date of birth
- Parents and siblings/relatives [if the latter are enrolled in the same facility]
- Address
- Contact details
- Emergency contact information
- Special needs information [if applicable]
- Means of travelling to and from the centre
- Exam/assessment results
- Any injuries sustained on site
- Photo of the child and anyone who is allowed to collect them
- Signed copies of any relevant documents, such as permission for photography, Child Protection Policy, Code of Conduct, reporting or grievance procedures, etc.
- A record of any past behavioural issues, causes for concern or suspicions/reports of abuse
- Where the child moves on to after leaving the centre

Staff Records

Suggested chart headings:

Record	Responsibility	Access	Location	Review
All identifying information	HR/ Management	Management/ office staff	Database	Annually

Categories to record:

- All relevant personal information [photo, full name with consistent spelling, address, contact details]
- Start date and history of employment with the organisation if they have had multiple roles
- Copies of CV, references and criminal background checks
- List of all training and professional development that they have undertaken
- Any reports of misconduct, how they were assessed and the outcome
- Full, signed, job description
- Any issues they have raised regarding the pupils, staff or environment, how these were assessed and the outcomes
- Signed copies of relevant policies- Child Protection, Whistleblowing, Conflict of Interest, etc.

Consultants/Contractors

Suggested chart headings:

Record	Responsibility	Access	Location	Review
Full name	Office Manager	Office Manager	Database/ paper file	Annually/ new contract start

Categories to record:

- All relevant personal information [photo, full name with consistent spelling, address, contact details]
- Copies of business details, references and criminal background checks
- A clear description of their role/duties, what kind of contact they are allowed with the pupils, how they are supervised, how they will be reviewed, etc.
- Any reports of misconduct, how they were assessed and the outcome
- Any issues they have raised regarding the pupils, staff or environment, how these were assessed and the outcomes
- Signed copies of relevant policies- Child Protection, Whistleblowing, Conflict of Interest, etc.



Staffing and Recruitment

Suggested chart headings:

Action	Responsibility	Recorded/ Checked	Review
The Centre enforces CP protocols	Management	Head Office	If there is a change in structure

Actions to record:

- The centre employs an individual who has overall responsibility for enforcing Child Protection protocols; if the role is combined with a similar function, the post holder is allowed adequate time and resources to carry out both responsibilities to the highest standard
- Staff have signed, understand, and abide by the centre's CP policy
- Staff are provided with practical instructions for ensuring day to day child safety
- Jobs are advertised in an unbiased manner
- There is an interview panel and set interview process
- References are contacted and background checks are carried out
- There is a probationary period and review
- A candidate should be allowed equal consideration, with the exception that their personal situation and beliefs must not contravene the ethos and rules of the centre. For example, a centre cannot legitimately teach their pupils that certain activities are wrong- domestic violence, child marriage- while employing someone who displays these attributes or behaviour.



Emergency Preparedness

Suggested chart headings:

Action	Responsibility	Recorded/ Checked	Review
Fire drills are carried out	Centre/ Premises Manager	In Fire Safety Record	Annually

Fire Safety

Information to record:

- Fire safety equipment- extinguishers, etc.- is available and are staff are trained to use it
- Pupils and staff know how to safely exit the premises and where they should gather
- Pupils and staff can be clearly alerted of danger [alarm, etc.]
- The environment has been assessed for fire safety

Weather

Information to record:

- The premises is weather secure
- The centre is equipped for maintaining safety in the cold/heat/rain
- In case pupils need to leave the premises early due to weather, there is a system in place for alerting parents/guardians and how this is managed

Illness/ Injury

Information to record:

- Staff members are first aid trained and employees and pupils are aware of who these individuals are
- There is emergency equipment on site [first aid kit, EpiPen, etc.]
- Emergency contact details [ambulance, police] are displayed in a central location
- Staff are aware of the procedure for responding to this kind of emergency
- Details of any incident recorded and if possible, lessons are learned

Missing Pupil

Information to record:

- There is a procedure in place for if a pupil is found to be missing/has departed the centre with the wrong individual, etc.
- There is clarity regarding who takes charge of the situation
- A record is kept
- If applicable, the incident is reported [to an oversight body]



Physical Environment

Information to record:

- The premises are adequate for the centre's function
- It has been checked for safety and physical condition, and this is regularly monitored and recorded
- The toilets/bathrooms are adequate for the number of pupils, clean and functioning properly
- The bathrooms provide for adequate privacy
- If the bathrooms are shared by various age groups/students and staff, there is a procedure in place for how the situation is monitored for safety



Arrivals, Departures and Transport

Suggested chart headings:

Action	Responsibility	Recorded/ Checked	Review
The centre is aware of which mode of transport individual pupils use	Centre/ Office Manager	In child's record	Annually, or if there is a change mentioned by guardian/child

Information to record:

- The centre is aware of which mode of transport individual pupils use
- Pupils are checked in immediately upon arrival
- Any absences are reported ASAP and inquiries are made
- Pupils are held in a safe place at departure time and are checked off against the day's list as they leave
- Bus drivers/Assistants know which pupils should be collected/dropped off by each bus and their names are ticked off as they board/depart
- The centre is aware of which individuals are allowed to collect a pupil, and has a system for verification/any changes



Physical Contact

The types and levels of physical contact between pupils and staff should be reasonably defined and all should be aware of what is and is not allowed. It is important to strike a balance between keeping pupils safe and creating an unnaturally "touch-free" environment, such as prohibiting a hug between a teacher and pupil or not allowing students' hands to be held as they walk down stairs.

PRACTICAL GUIDE FOR CHILD PROTECTION OFFICERS

Child Protection [CP] is about changing the environment to ensure that risks to child welfare are minimised, and organising an effective referral system for concerns [urgent and non-urgent]. This can ultimately only be successful if CP is embedded into organisational culture, so that each member of staff knows that they have an important role to play in ensuring child safety. We hope that this guide provides a useful starting point and helps you to identify some of the other resources you will need.

First Steps Checklist

1. Identify a member of staff to take the lead on Child Protection [Ideally a stand-alone Child Protection Officer]
2. Adopt a Child Protection Policy
3. Create a step-by-step guide of what to do if you have concerns
4. Follow best practice in record keeping
5. Undertake regular team training
6. Practice safe staff recruitment and support staff with whistleblowing and staff bullying policies

Starting Out

If a member of staff reported a CP incident, how would you determine the urgency of response?

- If urgent: do you know the name of the external agency to which you would report? Do you have their contact details?
- If non-urgent: how would you deal with this report? Would you create a standardised reporting form for staff to use? How would you keep a log in order to check for a pattern of abuse? Do you have somewhere to record this data securely?

➡ Point to consider – Do you have a work email address? Do the members of staff reporting safeguarding concerns to you have a work email address [or access to one]?

Training Staff

- Which staff do you need to train?
- What level of training does each staff member need?
- Have you met these staff members before?
- Do you know where they are based?

Once trained on their responsibilities, consider how you could put in place processes to make reporting easier for them [e.g. standardised reporting form with anatomical diagram to use to mark suspected abuse]?

➡ Point to consider – how can you ensure staff know who you are? Is it possible for you to work at their location [perhaps a few days each week]?

Managing Staff Expectations

- When you make an external report, what is the timescale for intervention? It might help the teachers you work with to know this information.
- Once referred, could you communicate updates to the teacher who made the initial report on the pupil? How could you manage a teacher's expectations during the referrals process?
- Are you confident that you could follow up to check on a referral you made to an external body? Do you have the right contact details? Consider how you might communicate this confidence to a teacher.

Your Resources and Support

- Do you have someone you can consult on matters of Child Protection?
- Are you confident that you have the right processes in place to protect you in your position?

Regular Checks

As soon as you are starting to feel confident in your role, you may wish to start making regular checks of your centre[s]. If you are not based in the centre, and even if you are, checking that CP procedures are followed consistently will undoubtedly be an important aspect of your role. Within this guide, the 'Practical Guide for Teachers and Staff' and 'Practical Guide for Funders' should provide a useful starting point.

CHILD PROTECTION SELF-CHECK FOR TEACHERS

We hope that this document will provide a useful starting point for teachers [or those who line manage teachers] to check they are confident when dealing with matters related to Child Protection. It is intended to be used after training has taken place.

Acting with confidence when a child reveals abuse (pupil disclosures)

Q. What do you think would constitute a pupil disclosure which would require a Child Protection action [outside of the child being in immediate danger]?

The teacher should be able to name the main types of abuse [physical abuse, sexual abuse, neglect and negligent treatment etc.] and give definitions/relevant examples. The answer to this question should be available within your organisation's Child Protection Policy [CPP].

Q. When a child makes a disclosure to you, how should you react?

The teacher should be able to list the key components of the correct way to behave in this scenario [e.g. listen without judgement, do not ask leading questions, do not promise confidentiality, reassure the child they did the right thing by telling you, explain what will happen next]. Ideally, teachers should be immediately familiar with these tenants, but it might be useful for new teachers and other members of staff who have less direct contact with pupils to have them written down. As long as the member of staff can access them easily, this might be acceptable.

Q. Once you have received a pupil disclosure, what should you do next?

The teacher should be aware of the need to act quickly, ensure confidentiality by including the minimum number of staff members possible and be as accurate as possible in their account. They should be able to name the member of staff to whom they should report [e.g. Child Protection Officer] and be aware of how to quickly find this person's contact details. They should be aware of who to report to if the disclosure is about the CPO themselves or a senior member of staff [who might be included in the CPO's reporting chain].

Q. What happens after the initial report?

Teachers should feel confident that the member of staff to whom they have reported will discharge their duties with the utmost professionalism. They should know:

- What the CPO does next [Do they make a judgement call on the level of severity? Do they investigate? Speak to other members of staff? Report externally?]
- Which external bodies to which the CPO reports
- The name and job title of the CPO's line manager
- How to escalate the matter beyond the CPO's line manager [this will include familiarity with the [Whistleblowing Policy](#) – see below]

This information should give teachers the confidence to ask the right questions if they feel the need to follow up. If they do not believe that the CPO has done their job properly or have concerns which they do not feel they can ask the CPO, they should know how to escalate the matter. Confidence in this area will also mean they can inform the child of what will happen next [to the appropriate degree].

Acting with confidence when you recognise possible signs of abuse

Q. What do you think would constitute a possible 'sign of abuse'?

Teachers will undoubtedly be able to use common sense to identify, for example, bruises, black eyes or consistent and severe poor hygiene. However, they should also be able to speak with confidence about the typical features of accidental and non-accidental injuries [e.g. for the latter injuries on both sides of the body, within the 'triangle of safety', pinch marks involving both sides of the ear] and to identify the signs of other kinds of abuse [e.g. emotional abuse, sexual abuse etc.].

Q. What should you do if you notice a possible sign of abuse?

Teachers should show an awareness that there are no injuries which are specifically indicative of child abuse, although some injuries or patterns of injury will be highly suggestive of it. They should be confident of what to do if they notice a possible sign of abuse. This might include discussing in confidence the sign with the CPO or filling in a form which might help to identify a pattern. If there is a form, they should know where this is and how/when to send it to the CPO.

Whistleblowing

Q. What is whistleblowing?

Teachers should be able to define the term, understand its application and importance, and have been trained on how to make a report.

Q. Does your organisation have a Whistleblowing Policy, and if so, where can it be accessed?

Teachers should know whether or not the organisation has a policy, where this is located and be able to say how they would easily access it.