ACS
BEIRUT

AMERICAN COMMUNITY SCHOOL BEIRUT

CHILD PROTECTION POLICY

2026-27

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ACS CHILD PROTECTION POLICY

- This policy was developed by ACS and Himaya and adopted on 2018
- This ACS Child Protection Policy was updated on: September 2022
- This ACS Child Protection Policy was updated on: September 2024

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ACS reserves the right to amend and/or review this policy as needed, at its discretion and as it deems appropriate. Such revision(s) and/or amendment(s), as the case may be, shall take immediate effect.

POLICY STATEMENT

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

PURPOSE OF THE POLICY

This document provides a rationale for a child protection policy (CPP) and describes the main components of the CPP that will be implemented at ACS Beirut in order to ensure a child-friendly environment. The Child Protection Policy (CPP) describes guidelines and procedures for:

- Raising awareness on child wellbeing
- Communication and behavior with children
- Detection and referral of child abuse
- Implementing management procedures and structures for policy implementation (i.e. the CPT, CPO and recruitment checks)
- Consequences of policy violations
- Recruitment and training of faculty/staff

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

POLICY SCOPE

All students registered at ACS are protected by the procedures in the CPP both on and off school grounds. “School grounds” include all physical property (land, buildings, classrooms, courtyards…), school transportation services (buses, vehicles), and any ground utilized for school services or events including overseas school trips.

Any signs of violence and/or abuse detected on a student will be acted upon according to the outlined procedures to safeguard the wellbeing of the student.

INTRODUCTION

The main aim of a child protection policy is to develop a child safe environment where children can develop in a safe and safe and healthy way and reach their maximum potential. This policy clarifies expected behaviors, outlines legal obligations and encourages safe practices. To create an effective policy, ACS has established a partnership with himaya to collaborate in the development and adoption of this policy, and consult with them in regards to the implementation.

Definitions and acronyms of the main terms used throughout this document can be found in Appendix 1.

A.Policy Development

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

This policy has been developed by Himaya and ACS in accordance with Lebanese Law 422/2002 *‘The Protection of Juveniles in Conflict with the Law and/or At Risk’,* specifically articles 25, 26 and 27, and the National Standard Operating Procedures for the Protection of Juveniles in Lebanon (SOP) adopted by the Ministry of Social Affairs. ACS is adhering to Ministry of Social Affairs (MoSA) recommendations to implement a child protection policy that protects children and promotes their well being.

The policy is also guided by focus group discussions with faculty, students and parent/guardian(s) within ACS, for the creation of a document representative of community members' needs and priorities[1].

B. Preserving Child Health and Wellbeing

Any harm directed towards children can result in negative consequences which may include a decrease in self-esteem, health problems (including mental health) and poor academic achievement. When a student is facing harm, they may develop persistent feelings of insecurity, fear, and disrespect that can affect their learning and development.

Therefore, ACS is committed to responding to all forms of harm, violence, abuse, neglect and exploitation against children.

Forms of Harm

Some forms of harm that children may face include, but are not limited to: child abuse and neglect, exposure to domestic violence, child labour, child sexual exploitation and child trafficking. Children may also experience: Self-harm, suicidal ideations, substance use, gang violence and peer-to-peer violence (bullying, cyberbullying, racism and homophobia).

Violent Discipline

There is a distinction between corporal punishment and physical abuse by law. However, they both have negative short-term and long-term effects on children. Abuse is typically differentiated by the frequency of violence, severity of violence, the age of the child and other factors contributing to their vulnerability. Examples of child abuse can be found in Appendix 1.

It is the belief of ACS to use a positive approach to discipline for the wellbeing and safety of children. Positive discipline is supported by international research and advocated for by international organizations including the WHO and UNICEF.

Child Abuse and Neglect

This policy pays special attention to Child Abuse and Neglect as defined below (and detailed further in Appendix 2):

Child Abuse and Neglect

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

Child Physical Abuse

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

Child Sexual Abuse

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

Child Psychological Abuse

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

[1] Focus Group Discussions were held in May-June of 2018

Child Neglect

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

All sources of harm mentioned in this section will be responded to via the referral procedure developed in this child protection policy.

ETHOS

A.Child Protection Values

ACS Beirut fully believes in the responsibility of academic institutions in ensuring child safety and supporting child development in the community. The values outlined here are fundamental to the effective implementation of the child protection policy and should be considered in all actions taken related to children.

i. Child-rights Approach: The focus of all activities and actions at the school are meant to benefit children and ensure that they are able to live in dignity with all their rights guaranteed, including the right to a violence-free upbringing. This value is inclusive of the four core principles of the Convention on the Rights of the Child (CRC):
   - Non-discrimination in dealing with all children;
   - Best interests of the child as the primary consideration;
   - Right of children to life, survival and development;
   - Right of children to express their views in all matters affecting them.

ii. Participation and Inclusion: Involving children in their own protection is essential as they have their own perspective, can offer insight into issues they face and are best informed about their own situations.

iii. Confidentiality: The school takes measures to ensure that any sensitive information is protected, and sensitive information is only shared when necessary to protect the child.

iv. Transparency: The school will follow the policies and procedures, will openly admit to oversights, and will respond to situations appropriately.

v. Cooperation: Protecting children from harm is the collective responsibility of all community members including students, parents, faculty/staff as well as community agencies and community professionals.

B. A Shared Responsibility

Protecting children from harm is the collective responsibility of all community members including students, parents, faculty/staff as well as community agencies and community professionals. The community can ensure the implementation of this policy and promote a safer environment via activities and programs implemented throughout the academic year. Ultimately, involving children in their own protection and encouraging cooperation among community members encourages the development of essential life skills associated with the reduced likelihood of child abuse and neglect.

CP STRUCTURE AND RESPONSIBILITIES

The term "community member" will be used to refer to faculty/staff, students, parent/guardian(s), Board of Trustees, volunteers, and visitors associated with ACS. The Child Protection Policy, detailing all guidelines and procedures, is available to the public on the school website and circulated. In this way, all community members are aware of the CPP, and understand the importance of compliance.

It is a shared responsibility for ACS community members to know:

- ACS's policies, values and standard practices
- How to react to suspicions and disclosures of abuse
- How to safely share concerns or disclosures as per the referral procedure

A.Child Protection Officer (CPO)

The Child Protection Officers (CPOs) are the assigned officers responsible for handling all witnessed or suspected cases of harm against a child within ACS. Each division will have its own dedicated Child Protection Officer (CPO) i.e. the school will have 4 CPOs.

Selection:

The Head of School shortlists nominees to the CPT for the position of CPO for each division. A majority is required to approve the selection. In the absence of the CPO, the Head of School can assign a suitable CPO in accordance with the preferred CPO characteristics (Appendix 3) and Job description of the CPO (CPO Appendix 10).

Responsibilities:

The CPOs' responsibilities are as follows:

- Know about the signs and symptoms of child abuse.
- Set regular meetings with divisional principals to review reported concerns and identify protection concerns.
- Understand and apply ACS's referral pathway (Appendix X) which includes taking the necessary reporting and informing procedures for cases assessed as imminent risk.[2]
- Document reported concerns and cases of potential risk in a confidential log.
- Apply confidentiality and data protection procedures with all documents containing information about children - including password protecting soft copies and storing hard copies in a secure cabinet in a locked room (CPO Appendix X).
- Ensure that the wishes and feelings of children are respected and addressed, especially before any measures are taken, to ensure their protection
- Consult with child protection experts about reports, cases and potential interventions before acting on allegations assessed as imminent risk, while maintaining confidentiality of the child, while maintaining confidentiality of the child.
- Consult fellow CPO's to determine the best responses to incidents and cases.
- Respect, and promote respect, of confidentiality and privacy of students
- The CPO reserves the right to discuss any CP cases with any CP team. (team work, collaborative work, discussions).
- The CPO has the option to call for further meetings based on needs.

B. Child Protection Team (CPT)

The Child Protection Team (CPT) stands to ensure the effective implementation of the policy throughout the school via: Enacting the policy; Intervention & Communication; and Continuous Development.

Composition:

The core Child Protection Team (CPT) includes: Head of School, Nurses, Director of Athletics and Activities and the Child Protection Officers (CPOs/Counselors).

Responsibilities:

Enacting the policy:

- Create subcommittees on a need basis to suggest and apply potential solutions for identified priority issues.
- Ensure that there are active CPOs throughout the academic year and nominate replacements when needed.
- Oversee the completion of the required annual training by all faculty and staff.

Intervention & Communication:

- Ensure dissemination of the CPP and its summaries on appropriate communication channels.
- Consult and involve students and faculty representatives in activities supporting the child protection policy implementation.

[2] In accordance with the Standard Operating Procedures (SOP) under the law 422/2002 and legal referral pathway (provided in the CPO toolkit Appendix X).

- Implement activities throughout the academic year that promote the CPP or promote a theme related to child development or child protection.
- Network with organizations, when relevant, to respond to identified community needs such as Himaya or appropriate organizations.

Continuous Development:
- Seek to ensure that all terms of the CPP are respected and applied by all community members.
- Develop guidelines and procedures, as required, for the effective implementation of the policy.
- Identify concerns or factors negatively affecting the wellbeing of students at ACS.
- Review and revise the policy and its procedures annually.

Frequency of meetings:
The Child Protection Team (CPT) meets annually to review the CPP and will hold any extra meeting on a needs basis. The CPO reserves the right to discuss any known child protection cases with other members of the child protection team. Minutes of the meeting should be taken and shared with CPT members.

Child Protection Officers have the right to discuss any CP cases amongst each other during counseling meetings.

C. Faculty and Staff

ACS Beirut faculty and staff have the following responsibilities:
- Abide by the ACS Beirut code of ethics and code of conduct (see Appendix X).
- Abide by the ACS Beirut Technology Acceptable Use Policy and the Social Media Policy (see Appendix X).
- Read, understand and sign a declaration of commitment (see Appendix X) to the CPP after reading the policy and bringing forward questions and concerns to the divisional CPO.
- Undertake training that covers the following themes: types of abuse, detection and referral, the CPP and the CPP procedures. The CPOs will ensure that any new faculty/staff member receives this training.
- Respect and apply the CPP and contribute to the promotion of a safe environment to improve outcomes for all children.
- Request technical support via the CPT to empower faculty/staff and students. Possible responses may be training sessions, school wide activities or talks from professionals on identified priority topics.
- Report all witnessed and suspected cases of harm against an ACS student within or outside school grounds. Reporting of a case should follow the Referral Procedure. (see page 14 in the Reporting and Managing Allegations section).

In adherence to the school's unwavering commitment to the safety and well-being of its students, solo trips with individual students are categorically forbidden under all circumstances. In order for a trip to take place, a minimum of 3 students and 2 teachers should be on the trip. This policy applies to all faculty members, staff, and volunteers, encompassing all school-related activities and events, and adheres to the stringent guidelines outlined in the Chaperone Form.

D. Nurse

The school nurse is in the position to identify signs and symptoms of abuse including clinical physical indicators or psychological indicators of abuse as the nurse interacts with children in a private area and may examine them when appropriate. Another nurse should be present in the same room as the student during the examination. The nurse will be provided with more information and general guidelines on suspicious bruising and signs by the CPO (end of appendix 11). The nurse should consult with the CPO whenever there are suspicious signs on the child or if they receive a disclosure thereby abiding to the Referral Procedure (on page 14).

The nurse is expected to preserve the privacy of any patient during examination and to protect confidentiality as standard practice entails. The nurse is expected to follow the defined pathways of the CPP like all employees and to report any sensitive information that may either indicate or confirm child abuse to the CPO.

E. Administration

Administrative personnel have further responsibilities in addition to abiding to the general responsibilities of faculty/staff.

Head of School

The Head of School has the additional responsibilities of:

- Assigning the CPOs annually based on majority approval
- Following up on case management whenever a child is deemed to be in immediate danger and requires referral, i.e. collaboration with child protection organizations (e.g. UPEL or himaya), and/or reporting and informing the relevant authorities.
- Meeting with parents in the presence of the CPO in cases when measures need to be taken.
- Taking decisions concerning breaches to the CPP by any member of the ACS community, and leading discussions with relevant Principal for appropriate response as per existing school policies.
- Participating in the Child Protection Team (CPT) and facilitating its activities.
- Allocating adequate time to discuss child protection issues during management team and board meetings.
- Allocating resources for child protection activities and student/faculty/staff development.

The Head of School can mandate a member of the administration to uptake his responsibilities when s/he is not available. This will most likely be a defined principal or senior leadership team member.

Principals

The Principal of each division has the additional responsibilities of:

- Allocating time to regularly discuss child protection issues with faculty/staff meetings.
- Allocating resources, within their division, for child protection activities and student/faculty/staff development.
- Actively encouraging community members in their division to report child protection issues and implement reporting procedures.
- Supporting the divisional support team in ensuring the wellbeing of students.
- CPO and Principal meet regularly to stay up to date on CP concerns.
- Meeting with parents in the presence of the CPO in cases when measures need to be taken.

Human Resources

The Human resources department along with any faculty/staff members involved in hiring and training employees, are obliged to carry out recruitment checks before an employee is hired (Appendix 3). This primarily includes seeking to ensure that faculty/staff members are free of previous child-related offenses through requesting a Judicial Record and by contacting at least 2 references. Additional responsibilities include mentioning the CPP in future job advertisements, asking prospective candidates to review the CPP before an interview and addressing the CPP during the interview. Employees are expected to read the CPP and sign the declaration form yearly.

F. Students

Students are expected to abide by ACS's disciplinary policies and procedures that outline all acceptable practices expected from students. These practices include but are not limited to: ACS's values, Student Code of Conduct, Social Media Policy and The Technology Acceptable Use Policy. Student conduct is important in creating a healthy environment for children.
The school provides specific lessons focused on child protection themes to students. Students are encouraged to participate in further promoting child protection values through student-led activities and initiatives.
If a student is experiencing, or has knowledge of, an incident of violence or abuse they are encouraged to report this information to receive support.

G. Parents/Guardians

ACS recognizes that families are the foundation of a healthy child and acknowledges that families can face challenges common to all. Accordingly, parents/guardian(s) will be invited to attend awareness sessions to support and engage families in understanding, participating and promoting the child protection policy. Additionally, parents/guardians can discuss their concerns with Principals, CPO's. Parents should also read, understand and sign a declaration of commitment of the CPP (Page 25), keeping a copy of it for their personal reference. It is encouraged that while reviewing the CPP, parents bring forward their questions and concerns to the CPO.

As students' best interest and safety is of utmost importance to parents and the school community, parents and students are expected to report any student protection concerns to the ACS CPO or to an administrator.

H. Board of Trustees

The Board of Trustees oversee the general activities of ACS and support the school administration in meeting the expectations of the community. In relation to the CPP, the Board of Trustees are required to:

- Become familiar with the entire policy as well as relevant procedures
- Participate in the annual revision of the policy and its procedures, as needed
- Review CPP implementation using a monitoring checklist
- Explore how to empower faculty and staff, and, involve the wider community
- Assign time in meetings to discuss child safety and wellbeing
- Assign board member to lead investigation into allegations against the head of school if such a need arises

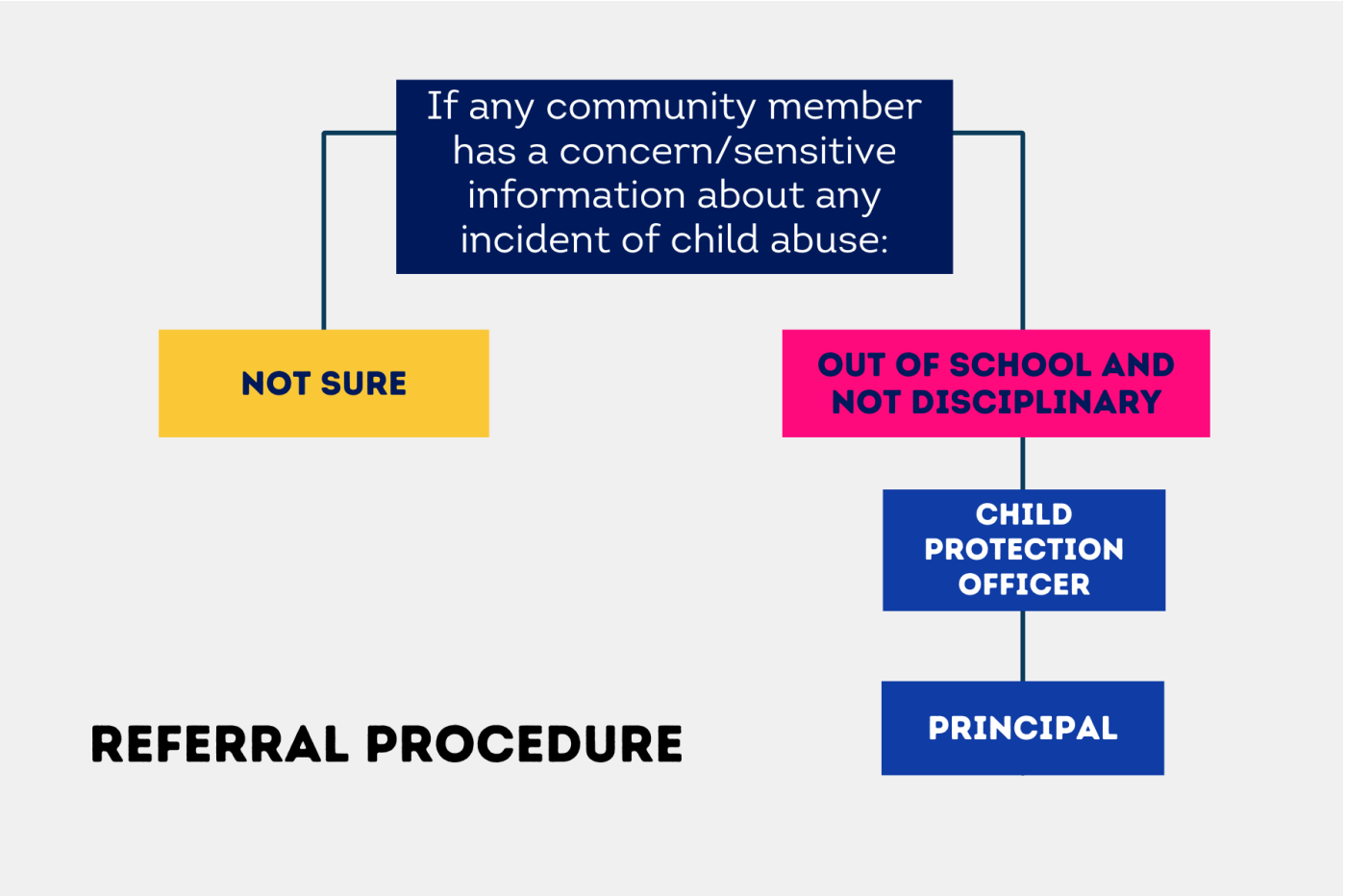
I. Volunteers/Interns/Visitors/ Contractors

Volunteers, visitors, including contractors, bus drivers and cleaners, will be briefed on their roles and responsibilities by faculty/staff members or, preferably, by the CPO, as per the Child Protection Policy (CPP). Any individuals with prolonged contact with children must complete the online CP training course and must sign a declaration of commitment to the child protection policy. Short-term visitors or guest speakers should be accompanied by trained faculty/staff to ensure the policy is not breached. Advisable protection procedures to be taken with volunteers and visitors are in Appendix 4.

MANAGING REFERRALS AND ALLEGATIONS

Mandatory Reporting

All community members have the obligation to report cases of abuse, and they have the right to report anonymously. Reports will be handled according to the Referral Procedure (concern vs sensitive information).



1. Community member has information

A community member may have information that indicates, or confirms, that a child is experiencing abuse through: observing certain signs, receiving information indirectly, witnessing an incident or receiving a direct disclosure from a child. Whenever a community member has a reasonable suspicion that a child is experiencing any form of abuse, it is their responsibility to report to CPO or Administrator, as per the referral procedure set out above in this policy.

Suspicions should not be personally verified by the reporter; follow-up is done by assigned specialist(s) with utmost care to protect the child and reporter from harm. As such, a reasonable suspicion is sufficient for any community member to make a report (defined by the referral procedures (page 14).

Guidelines when receiving a disclosure:

Students may approach a trusted adult to share an experience of abuse or harm. In the case that a child discloses an incident of abuse or harm to a community member, the adult should follow the guidelines listed below. The main aim of the conversation is to understand the basic facts (When, Where & Who), seek to determine if the child is currently in danger and explain to the child that a referral is necessary to protect them from harm.

When talking to the child, the following need to be considered:

- Find a quiet, non-public place to talk to the child
- Stay calm and listen carefully
- Respond with empathy and support
- Consider the disclosure seriously
- When talking to young children, clarify what their terms mean (use their words/language)
- Avoid investigative and leading questions
- Limit questioning to critical information (as stated above)
- Reassure the child that he/she has done right by speaking up
- Reinforce the notion that the child has the right to be safe
- Be transparent and explain to the child what you need to do
- Do not promise the child secrecy concerning the case he/she has shared, but do ensure his/her privacy and confidentiality will be respected as the case will only be discussed with the CPO and whoever is legally required to know
- Contact the CPO as soon as possible to refer the student and follow the referral procedure. If CPO is unavailable, seek the assistance of an administrator. Refer to the referral timeline (page 14) of this document.

A community member receiving a disclosure should not:

- Express shock or disbelief
- Attempt to determine if the allegation is valid or invalid
- Ask leading, suggestive or unnecessary questions
- Ask ‘yes/no’ questions
- Make assumptions about the incident
- Pressure a child to disclose information
- Ask ‘why’ in response to the information shared
- Shame the child
- Call the child’s parents
- Promise to keep the reported incident a secret
- Lecture the child or blame them in any way
- Give the child advice about how to deal with the situation
- Convey anger or impatience if the child is not ready to discuss the incident

Situations that place a child at imminent risk (refer to page 26) must be immediately reported to the CPO within 24 hours, or by the end of the working day.

2. Reporting

Before a community member decides who to report to, they should always consider the best interest of the child. This includes considering the child's safety, preserving the confidentiality of information and considering the CPO or the administrator in the best position to intervene to support the child.

a) Type of information

Sensitive information

Definition:

This is when a community member obtains information through a disclosure by a child about an incident of abuse that the child experienced within the school or outside of the school. It could also be an incident that the community member witnessed. This type of information will usually be sufficient to show that the child is in danger or was involved in an incident where he/she was harmed. It is private information that should be restricted to the least number of people possible.

Reporting Procedure:

If a community member receives sensitive information through a disclosure by a child, then they should report it to a CPO in order to protect confidentiality. For example, if a child discusses harm to themselves or domestic violence, then this information should be passed on to the CPO, as it is private. The CPO will inform the principal with necessary details in order to respect the privacy of the student. Communication is done on a "need-to-know basis" in such cases where the details of an incident are shared only when necessary for intervention and to protect the child's wellbeing.

Concern

Definition:

This is when a community member has noticed a change in the child's behavior or any indicators that they believe, independently or cumulatively, indicate that the child is being exposed to harm. It is usually general and non-specific information.

Reporting Procedure:

In this case, the teacher should refer to a member of the CPO or the Principal to discuss the sign(s) directly with one member. (e.g. discussing drop in grades with principal/counselor, asking nurse to examine suspicious bruise(s) on a child, informing the counselor of a student's noticeable change behavior). As is standard practice, standards of confidentiality must be maintained at all times.

Uncertainty

If a community member is unsure of the correct response they should report the incident directly to the divisional CPO in order to preserve confidentiality.

b) Reporting timeline:

As a general rule: report as soon as possible. If the community member feels that the child is at imminent risk then they must report within 24 hours, otherwise, the community member will have up to 3 days to report incidents/suspicions. Imminent risk is when the child is in immediate danger e.g. a direct disclosure of sexual abuse. When unsure, the community member should report as soon as possible to the CPO.

c) How to Communicate with the CPO:

Reports to the CPO must be done in person, over the phone or via email.

Allegations against CPO:

In case there are any concerns or suspicions about the conduct of a CPO then the concerned community member should report directly to the Head of School.

Allegations against Head of School:

When there are any concerns or suspicions about the conduct of the Head of School then the community member should report directly to a CPO who will then report to the President of the Board of Trustees.

3. Responding

a) Response to a concern

Once a community member reports a concern to the CPO, he/she will design an intervention plan and follow up with the student.

b) **Response to sensitive information**

CPO:

1.Assessment & Documentation

When the CPO receives information about a disclosure or if a student is referred to the CPO, e.g. from the Divisional Support Team, the CPO must record and assess the available information. At this stage, the main aim is to identify the risk level without compromising the safety and wellbeing of the child. The incident should be described to the CPO with the necessary details and the CPO should ensure that information about any child remains confidential; sharing on a "need-to-know basis" and storing information securely. The CPO may need to meet with the relevant community member for more information when possible.

Once sufficient information is collected, the CPO will assess the severity of the case to determine if the child is facing imminent risk or potential risk. Depending on the risk level, the response will differ as described below and in the section on managing allegations that outlines the organization's possible responses according to the source of harm (Appendix 7).

The CPO will have up to 48 hours to respond to potential risk and up to 24 hours to respond to imminent risk.

2.Action Plan

Once all information is collected from the primary source and relevant community members, the CPO may:

- Consult with the Divisional Support Team (counselor, nurses, principals) at the school to set an internal action plan.
- Consult with a child protection organization especially when there is doubt about the course of action, while maintaining the appropriate confidentiality measures.
- Consult with other divisional CPO's to discuss the best course of action.

After consultation, possible responses may include, but not limited to, one or more of the following:

- Potential Risk
  - An internal action plan in the school with the Divisional Support Team, especially the counselors, and monitoring the child. Each divisional CPO will be a member of the corresponding Divisional Support Team. If more concerns are detected or if sensitive information becomes apparent leading to an increased level of risk, the CPO can seek further support.
  - A risk may be initially characterized as a 'potential risk' but upon investigation, or monitoring, becomes an 'imminent risk' which will then require a shift in response.
  - Meeting with parent(s) to discuss concerns
  - Referring the student or family to psychologists outside of school

- Imminent Risk
  - In coordination with the head of school, refer to a CP organization or the 'Union for the Protection of Infants in Lebanon' (UPEL) or the Ministry of Social Affairs (MoSA).
  - Allegations against non-community members: It is recommended that the CPO consults a child protection organization when alleged abuse occurs outside of school grounds involving external parties (caregivers or other adults). If the alleged

perpetrator is not part of the school community (ex: the student's neighbor), then the CPO should not attempt to intervene but rather, should refer the case to a child protection organization.

Confidentiality:

All information relating to child abuse shared by students or other community members should be treated as confidential and, therefore, should not be discussed outside of the context of the reporting pathway. Any conversations between community member(s) and the CPO should not be discussed with anyone else. The CPO should inform a community member that reports an incident that the report was received and is being followed up on. The CPO must not share subsequent details about the child with the community members but rather, generally, reassure that the child is being followed up on. In all situations, the divisional CPO will provide the community with advice and guidance on how to deal with the child.

4. After a report is made:

The CPO will inform the reporter that the case is being followed-up. Depending on the situation, the CPO may ask for more information from the reporter and may give them recommendations about how to deal with the child.
When a community member is in further contact with a child that has disclosed sensitive information to them, they should:

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

TYPES OF ALLEGATIONS AND RESPONSES

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

As stated in previous sections, when a child is in imminent risk, the CPO and the administration have a legal obligation to report the incident to a judicial authority as expressed in Law 422/2002 and as per the CPO referral procedure. The administration is encouraged to seek support from a CP organization, especially when deciding whether or not to report an incident, while maintaining the confidentiality of the child.

A. Student - Student

When inappropriate behavior occurs on school grounds whereby a student has caused harm to another, it will be reported to the Principal, and the Head of School when appropriate, who shall then determine the next interventions as per the school organization's policies with possible responses including:

- Counseling
- Referral to outside psychological or behavior specialist
- Verbal Warnings
- A meeting to be held with the students, parent/guardian(s), CPO and a member of the administration when appropriate
- Written warnings
- Suspension or expulsion in some cases

ACS believes that counseling is an integral part of responding to student misconduct.

B. Student – Faculty/Staff

When an allegation is raised against a faculty/staff member, the school administration will be informed and proceed to promptly investigate the evidence available in order to determine the best response. The investigation procedure should ensure a transparent and fair investigation. Guidelines for internal investigations are in CPO appendix 15.

Certain infringements will be handled internally, unless otherwise determined fit by the CPO's analysis and administrative support. Therefore, in such cases, such incidents will follow the school's regulations and policy to determine the correct response, in coordination with a child protection agency if needed (while maintaining confidentiality), which may include:

- Warning: Any teacher on probation due to misconduct towards students will be prohibited from traveling (one on one) with students or overnight trips. They can't be in charge of any group of students until further notice.
- Return to work conditional on seeking psychological support e.g. anger management
- Suspension
- Dismissal

For more serious incidents a formal investigation should be conducted by the school. During an investigation of a faculty/staff member, the school administration will protect the privacy of faculty/staff until circumstances are clarified and a formal decision is taken. Depending on the circumstances and accusation, the accused may receive a temporary suspension pending the findings of the investigation. (See Appendix 14)
The internal investigation is intended to be concluded fairly and promptly. The administration will be obligated to transparently discuss the incident with the parents of the victim and then the victim upon the resolution of the internal investigation. Guidelines for internal investigations are available in CPO appendix 15.

C. Student - Parent

When the source of alleged harm is a parent, the CPO will assess the level of risk, consult with the HOS, Principal and/or the Divisional Support Team, and determine the appropriate courses of action.

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

When support is needed, it is recommended for the CPO to consult with a CP organization before approaching parents in order to guide a safe approach while providing information on possible services.

SUPPORTING OUR COMMUNITY MEMBERS

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

Further, ACS recognizes that faculty/staff and/or community members who become involved with a case of child harm may find the situation stressful and upsetting. The faculty/staff member can discuss potential supportive strategies with the CPO and Head of School.

CONFIDENTIALITY

Data Protection and Storing Information

ACS is well aware that all matters relating to child protection and safeguarding are confidential. Accordingly, any records that contain sensitive information about a child will be stored using strict confidentiality and data protection guidelines outlined in the CPO toolkit (Appendix 15). This includes information on how to password protect soft copies and clear guidelines on storage of hard copies.

Need-to-know basis

Information will be shared with the least number of individuals who are able to respond to protect the child. Accordingly, the CPO will only disclose information about a child to other members of faculty/staff and/or an authority on a need-to-know

basis only. An authoritative party involved in the reporting pathway and legally mandated to handle incidents/cases of abuse will require information to intervene (Appendix 15).

Consent before sharing information:

A child will be informed, consulted when possible, before any action is taken to protect their wellbeing, for instance before contacting their parents. In some situations information may be shared against the will of a child, in which case, the faculty/staff member will explain to the child the necessity of reporting; the priority is always protecting the child and other children from harm.

Mandatory Reporting

For cases of imminent harm against children within the conditions of law 422, all faculty/staff must be aware that professional secrecy is lifted when informing/reporting (Law 422, art. 26 and 23).

Protecting Sensitive Information

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

ONLINE CHILD PROTECTION PRACTICES

Faculty and Staff:

- Follow ACS Child Protection Policy and Code of Conduct.
- Report any child protection concerns to the school's CPO.
- Observe the appropriate dress code when joining a virtual classroom, – online dress code follows the same guidelines as on campus dress code.
- Faculty should maintain the same professional boundaries with students online as they are required to do in person, as per the Code of Conduct (contact that a reasonable person may question should be avoided).
- All online contact with a student should be observable and interruptible by adults at either location
- Online sessions carried out by faculty should be conducted in a common area in the house, office or classroom and not in a place that is personal or casual (eg. Bedroom). It is preferable that the background be impersonal. If needed, use a neutral virtual background.
- Online group/class sessions can be held with one teacher. Parents are to be informed of, and aware that, an online class will be held at that time.
- It is recommended that a trusted adult be present (within earshot) at the student's location when there are online sessions.
- In most cases, online communications with groups of students is preferable over individual sessions.
- If there is a concern and the teacher needs to meet the individual student on a regular basis then the principal and/or parents need to be aware.
- In the Lower school division, online sessions with individual students should take place in a common area that is easily interruptible and can be:
  - With two teachers present with the individual student OR one teacher present with the individual student who is in the presence or within earshot of a parent, caregiver or another adult.
  - If a teacher needs to meet online with an individual student then it is further recommended that this teacher inform their principal and/or another faculty member of this meeting and let them know the timing, location and the reason for the session in advance and send confirmation of it after.
  - If during an online session, a teacher needs to pull out a student into a breakout room (to speak to them about behavior, emotional breakdown, etc), and parents are not available at the student's location, then the teacher needs email the parents directly after the meeting and inform them that they pulled out their child and the reasons for doing so.
- Individual student online sessions cannot be recorded

- Group sessions can be recorded
- All online sessions are to be held on school approved learning platforms ONLY
- If online sessions are disrupted due to technical difficulties, avoid changing platforms. Reschedule the session.
- Personal media of faculty and staff should be private and inaccessible to students. – Do not add, follow or allow students to follow you on social media.
- Faculty/staff should not give out or share their private numbers/emails with students – all forms of communications should be via ACS email or ACS school approved learning platforms. Where this is not possible, consider having a system where at least two faculty members have access to these communications.
- All digital communications between students and teachers are restricted to messages that have an educational purpose.
- Faculty/staff should not request or respond to any personal information from students other than that which may be necessary in their professional role. They should ensure that their communications are open and transparent
- Taking photos/screenshots of students online for reasons other than educational purposes is not permitted.
- Parent permission is required before sharing/publishing photos of their children
- Ensure that clear expectations of online learning and online CP policies are shared with parents

Counseling Sessions:

- For counseling, the student, where possible, should be located in a room which is private but which is not a bedroom or bathroom. If a student cannot avoid taking a counseling session from their bedroom, the counselor should consider holding the session with audio only, not video.
- The counselor is required to obtain consent from students and /or parents of students under a certain age to engage in virtual one-to-one sessions with a counselor.
- The counselor has the obligation to make sure the student knows that they can stop the session at any time.
- The counselor needs to have a safety plan in place for students in distress or at risk of harm, which sets out what steps should be taken to support the student in this online environment.

Parents/Guardians:

We would like parents and guardians to take part in ensuring online safety of their children as students' online learning presence should reflect on-campus learning presence as much as possible.

- Parents and guardians will be informed when there are online sessions in advance.
- Parents and guardians have a responsibility to ensure that their students are indeed sitting up on a chair and not laying down on their bed/couch when studying online and are wearing appropriate clothing (not their pajamas).
- It is recommended that online sessions be observable and easily interruptible if possible; all online sessions are expected to be conducted in a common area in the house, such as the living room, office or any other neutral location.
- With respect to classes that require photo documentation, if a student does not wish to send or share photos, videos and screenshots online when required for a class; the student and/or guardian(s) should inform the teacher of their preference at least a few days in advance of an assignment due date and suggest an alternative method be used as proof of completion of the assignment.

FURTHER INFORMATION

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

- Preferred CPO Characteristics (See Appendix 5)
- Contact information of relevant organizations and references (See Appendix 6)
- Risk Assessment (See Appendix 7)
- Law 422/2002 (See Appendix 8)
- Reporting Form (See Appendix 9)
- Confidentiality and Data Protection guidelines (See Appendix 10)
- Information for Nurse (See Appendix 11)
- Job description of the CPO (See Appendix 12)

Through this partnership, himaya commits to support ACS in managing cases, providing services and offering consultation in implementing procedures for this CPP.

DECLARATION OF COMMITMENT TO THE CHILD PROTECTION POLICY

Declaration of commitment to the 'Child Protection Policy' for ACS developed in consultation with himaya.

I, the undersigned (Full Name) ....., having read and understood the principles and basic standards of the Child Protection Policy for ACS, developed in consultation with himaya, agree to implement the policy throughout the time I am affiliated with the institution.

APPENDICES

Appendix 1: Acronyms and Definitions

Acronyms:

CRC- [United Nations] Convention on the Rights of the Child
CPO- Child Protection Officer
CPT- Child Protection Team
CPP- Child Protection Policy
MoSA- Ministry of Social Affairs
SOP- Standard Operating Procedures for the protection of juveniles in Lebanon

Definitions

Bullying

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

Child

For the purposes of this document, a "child" is defined as anyone under the age of 18, in line with the UN Convention on the Rights of the Child and Lebanese Law 422, or older in case they are enrolled as students at ACS.

Child Abuse and Neglect

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

Child Neglect

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

Child Protection

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

Child Physical Abuse

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

Child Psychological Abuse

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

Child Sexual Abuse

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

Concern (Reporting Pathway)

This is when a faculty/staff notices a change in the child's behavior or any indicators that they believe, independently or cumulatively, suggest that the child is being exposed to harm.

Imminent Risk

All forms of abuse, threats or other circumstances endangering the safety and development of a child that require immediate judicial measures to prevent serious harm. (Standard Operating Procedures for the protection of juveniles in Lebanon– SOP).
Inappropriate behavior of children towards other children
This encompasses any inappropriate behaviors or misconduct that negatively affect children and result in disciplinary sanctions. Bullying has been highlighted in the definition below as it is a common form.

Potential Risk

Threats that can affect the development and safety of a child but do not require immediate judicial measures. (Standard Operating Procedures for the protection of juveniles in Lebanon– SOP).

Sensitive Information (Reporting Pathway)

This is when a faculty/staff member obtains information through a disclosure about an incident of abuse that the child experienced within the organization or outside of the organization. It could also be an incident that the faculty/staff member witnessed. This type of information will usually be sufficient to show that the child is in danger or was involved in an incident where he/she was harmed.

Appendix 2: Types, Forms and Indicators of Child Abuse

Identification is a key factor in responding to child abuse and neglect. Due to the time they spend with children, educators have the opportunity to observe the behaviors of children in a variety settings and circumstances and identify potential indicators of child abuse.

A single indicator is usually insufficient to prove that abuse is taking place. However, the repetition of an indicator or a combination of indicators should alert educators to the possibility of abuse. Moreover, the same signs may be indicative of more than one type of abuse.

This list is not all-inclusive and can be used as a guide only.

Remember: As teachers/educators, your role is not to investigate suspected abuse. Your role is to convey your suspicions and concerns to the CPO (Child Protection Officer), directly or indirectly, who will assess the suspicions/report to the proper authorities, if applicable.

PHYSICAL ABUSE		
Forms	Physical Indicators	Behavioral Indicators
• Assault: slapping, hitting, scratching, biting, punching, kicking, grabbing by the neck • Violent handling: shoving, pulling, dragging • Choking/smothering • Burning • Shaking a young child (0 to 3 years old) • Severe corporal punishment • Assault with an object or weapon • Causing an injury that results in hospitalization • Holding captive (or hostage)	• Unexplained bruises and welts: on face, lips, mouth, eyes, torso, back, buttocks, thighs • Bruises in various stages of healing clustered, forming regular patterns marks reflecting the shape of the article used to inflict the injury (i.e., electric cord, belt buckle) regularly appear after school absences, weekends, or vacations • Unexplained burns: cigar, cigarette burns, especially on soles, palms, back or buttocks immersion burns (sock-like, glove-like or doughnut-shaped) patterned like electric burner, iron, etc. rope burns on arms, legs, neck, or torso • Unexplained fractures: to skull, nose, facial structure in various states of healing, multiple or spiral fractures • Unexplained lacerations or abrasions: to face, mouth, lips, gums, eyes, torso, arms, back, buttocks, thighs to external genitalia, human bite marks, bald spots • Untreated medical or dental problems	• Apprehensive when other children cry • Behavioral extremes, such as aggressiveness, withdrawal, or being overly compliant • Afraid to go home (or to go to a specific location) • Reports injury by caretaker • Complains of soreness and moves awkwardly • Self harm and violent behavior towards others • Wears clothing that covers body and is not appropriate for the weather • Chronic runaway (especially adolescents) • Uncomfortable with physical contact or touch • Seems frightened of parents and caregivers (or of a particular adult) • Apt to seek affection from any adult • Decline in school performance • Fear of making mistakes for fear of being harmed (which could lead to behaviors such as not submitting classwork) • Hyper vigilant • Gives implausible explanations of injuries

PSYCHOLOGICAL ABUSE		
Forms	Physical Indicators	Behavioral Indicators
• Belittling, degrading and other nonphysical forms of hostile or rejecting treatment of child • Shaming and/or ridiculing the child, including the child's physical, psychological and behavioral characteristics • Consistently singling out one child to criticize and punish, to perform most of the household chores, or to receive fewer rewards • Public humiliation • Restricting, interfering with or directly undermining the child's important relationships (e.g., restricting a child's communication with his/her other parent, making frequent derogatory comments about other parents, placing the child in a loyalty conflict by making the child unnecessarily choose to have a relationship with one parent or the other, blaming the child for marital or family problems etc.) • Manipulation (e.g., inducing guilt, fostering anxiety, threatening withdrawal of love) • Failing to express affection, caring, and love for the child and showing little or no emotion in interactions with the child • Threatening to abandon or abandoning the child • Setting rigid or unrealistic expectations with threat of loss, harm, or danger if they are not met • Demonstrating a pattern of negativity or hostility toward the child (e.g. the caregiver screams at the children that they can never do anything right) • Threatening or perpetrating violence (which is also physical abuse) against the child, or threatening or perpetrating violence against a child's loved ones or objects, including domestic/intimate partner violence observable by the child • Using fear or intimidation as a method of disciplining. • Thwarting the child's developing sense of maturity and responsibility (e.g. infantilizing the child). • Allowing little or no opportunity or support for child's views, feelings, and wishes • Exposing the child to extreme, unpredictable, and/or inappropriate behavior (e.g. drug use in front of the child).	• Loss of previously acquired developmental skills such as regression in toilet training • Failure to thrive i.e. low weight for the child's age (especially in infants) • Headaches or stomach aches with no medical cause • Ulcers	• Habit disorders (sucking, biting, rocking, etc.) • Conduct disorders (oppositional, defiant, antisocial, destructive, etc.) • Sleep disorders • Eating disorders • Inhibition of play • Overly adaptive behavior: inappropriately adult-like or inappropriately infantile • Speech disorders • Loss of self-confidence or self-esteem • Depression, anxiety and suicidal thoughts and behaviors • Social withdrawal or a loss of interest or enthusiasm • Desperately seeks affection • Avoidance of certain situations, such as refusing to go to school or ride the bus • A decrease in school performance or loss of interest in school • Delinquent behavior (especially adolescents) • Drug and/or alcohol abuse • Risky sexual behavior • Self-harm

SEXUAL ABUSE		
Forms	Physical Indicators	Behavioral Indicators
• Making a child take their clothes off or taking off one's clothes in front of a child • Fondling of child's genitals or breasts • Masturbation in the presence of a child or forcing the child to masturbate • Discussing sex explicitly in front of a child • Exposing a child to sexual acts • Forcing or encouraging a child to take part in sexual activity • Sexual acts of any kind with a child, including vaginal, oral, or anal sex • Vaginal or anal penetration by a penis, finger or any other object • Sexually exploiting a child for money, power or status • Exposing the child to or involving the child in pornography • Producing, owning, or sharing pornographic images or movies of children • Any other sexual conduct that is harmful to a child's mental, emotional, or physical welfare	• Difficulty in walking or sitting • Torn, stained, or bloody underclothing • Pain or itching in genital area • Pain on urination • Bruises or bleeding in external genitalia, vaginal or anal areas • Venereal disease • Odor in genital area • Frequent urinary or yeast infection • Red or swollen genital area • Bedwetting and fecal soiling beyond the usual age • Sexually transmitted infections • Frequent unexplained sore throat • Excessive masturbation • Frequent psychosomatic complaints (e.g stomach aches) • Regression in toilet training • Extreme weight loss/gain • Pregnancy • Physical maturation beyond the child's age (ex. breast or menstrual cycle at age 7 or 8)	• Difficulties in concentrating • Frequent absences from school, many times justified by parent/caretaker • Abrupt change in child's behavior/moodiness • Depression • excessive crying • Clinging behavior • Low self-esteem • Reluctance to undress for physical education/nurse • Unwillingness to participate in physical/recreational activities • Afraid to be alone with adults • Wary or threatened by physical contact, closeness • Severe drop in school performance • Overly-sexualized behavior toward peers or adults (such as undressing in class or asking classmates to undress, eagerness to expose "private body parts" to adults) • Persistent and inappropriate sexual behavior • Repeated attempts to run away from home • Poor peer relationships • Pseudo-maturity • Self-harm e.g. suicidal threats or attempts • Detailed and age-inappropriate understanding of sexual behavior • Unexplained money or gifts

Neglect		
Forms	Physical Indicators	Behavioral Indicators
• Not providing the child with enough food • Not providing the child with proper shelter • Not providing the child with adequate clothes • Failing to keep a child safe from danger (for example leaving children on their own unsupervised for long periods of time) • Depriving a child of an education, failing to send child to school • Letting a child's injuries, health issues or dental problems go untreated • Ignoring the advice of a doctor or dentist, refusing to allow a child to be treated and not taking children to routine appointments such as vaccinations. • Not giving the child proper structure, age appropriate rules (bedtime hours, curfews, balance between study and playtime etc.) • Leaving a child with an impaired caregiver.	• Poor growth or weight gain • Consistent hunger • Inappropriate dress, clothing dirty or wrong for the weather • Poor hygiene • Unattended physical problems or medical needs • Emaciated features • Untreated injuries, medical and dental issues • Not being given appropriate medical treatment • Repeated accidental injuries caused by lack of supervision • Poor muscle tone or prominent joints • Skin sores, rashes, flea bites, scabies or ringworm • Thin or swollen stomach • Tiredness • Faltering weight or growth and not reaching developmental milestones (known as failure to thrive)	• Begging, stealing food • Constant fatigue, listlessness or falling asleep • States there is no caretaker at home • Frequent school absence or tardiness • Self harm and violent behavior towards others • School dropout (adolescents) • Poor language, communication or social skills • Lack of age appropriate supervision • Alcohol/drug use • Disorderly behavior, juvenile delinquency • Abrupt change in child's behavior/moodiness • Difficulties concentrating

Appendix 3: ACS Beirut Code of Conduct: Treatment of Students

American Community School Beirut recognizes its responsibility in providing for the care and protection of students whose health and wellbeing are of primary concern. Our school is committed to the concepts of outlining, implementing, and holding to standards of excellence in all endeavors.

ACS Beirut is committed to:

- Providing a safe, supportive, and protective learning environment for children;
- Taking action to prevent reasonably foreseeable harm to students; and
- Reporting in accordance with the referral procedure when an employee reasonably suspects harm or risk of harm to students.

Commitments and expectations as an employee at ACS Beirut are to:

- Provide a safe and secure place of learning for all our students.
- Form professional and positive relationships with students.
- Serve as a positive role model for students by being respectful, kind, enthusiastic, ethical, honest, and fair.
- Engage in open, honest, and respectful communication with students.
- Create a learning environment in which students are encouraged to take risks and express their views.
- Understand the unique developmental needs of students and use this knowledge to guide professional practice.
- Use effective instructional and assessment practices to motivate students and maximize learning.
- Establish clear expectations, with student input, for classroom rules and procedures and use them consistently and fairly.
- Respect both physical and personal boundaries in interactions with students; do not be alone with children unless the door is open and other adult(s) are notified.
- Abide by all policies, procedures, and practices related to child protection and electronic communication/social media.
- Handle concerns appropriately, directly, honestly, and only with those most directly involved; maintain confidentiality.

Behaviors not aligned with commitments and expectations of ACS employees and are thus prohibited, resulting in disciplinary actions:

- Extending personal contact with students beyond school and professional responsibilities.
- Touching or speaking to a student in a sexual, suggestive, or other inappropriate manner.
- Harassing students.
- Inflicting physical or emotional abuse on a student, which may include physical contact, humiliation, ridicule, or threats.
- Smoking/using tobacco products, or possessing/under the influence of alcohol or illegal substances while on campus or while supervising ACS students.
- Providing a child, who is not your own, a ride, without the consent of her/his parent or guardian.
- Engaging in private communications with students (digital or other) except for activities strictly involving school business. (“See policy…. “ Cross reference when created…. “Electronic communication that takes place over a school network or platform may be subject to periodic monitoring.” - This needs to be placed in the electronic communication document)
- Using profanity/sexual innuendos in the presence of students.
- Sharing of privileged information about students (demographic, locational, photographic) outside of school, without written, expressed consent from school administration.
- Exchanging (to/from) gifts with students without parent/guardian consent.
- Providing alcohol, illegal substances, or inappropriate media to students.

Disciplinary Actions

Any action inconsistent with this Code of Conduct, or failure to take action as mandated, may result in disciplinary action up to, and including, termination of employment at ACS Beirut.

Appendix 4: Protection Procedures for Visitors & Volunteers

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

If the individuals are expected to have prolonged interactions with students (long-term visit) within the school setting they are required to be briefed on the expected behaviors as per the CPP and brief detection and referral procedures. A summary document will be provided for these visitors to sign and abide by. If the visit is short-term, a member of faculty/staff should be present to observe the activities to ensure no policies or rules are breached.

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

Appendix 5: Preferred CPO Characteristics

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

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

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

CPO TOOLKIT

Appendix 6: Contact Information of CP Organizations

"Informing" (Non-Judicial pathway for potential risk):

Ministry of Social Affairs (MoSA)	01/ 429 384
Himaya, (Beirut & Mount Lebanon Office)	79/ 300412 – 03/ 414964

Reporting (Judicial pathway for imminent risk):

Union for the protection of juveniles in Lebanon (UPEL)	03/ 784 265 - 01/ 427 973
Judicial Authority: General Prosecutor for child protection issues, (Beirut)	03/ 683 074
Himaya, (Beirut Office)	79/ 300412 – 03/ 414964
Training / Policy Development: Himaya, (Capacity Building Research & Development)	71/ 702 316

Appendix 7: Risk Assessment

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

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

To simplify this process for the school setting, the CPO should focus on collecting information on the following factors for adequate assessment. The CPO should contact a child protection organization whenever they are uncertain of the outcome (subject to compliance with applicable confidentiality obligations):

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

Frequency of harm:

- Number of incidents over a time period
- Knowing the incident is recurring
- Concerns registered from the past

Type of harm

- Physical, psychological, sexual or neglect (can be more than one)
- Any other types of abuse they are exposed to e.g. domestic violence or intimate partner violence

Severity

- How likely is the incident to cause harm
- Potential impact of the harm or its signs in the school setting

Source of harm

- The relationship of the child and the perpetrator or source(s) of harm
- The ability of the source to reach the child

Duration

- The period of time in which the harm has occurred
- Accumulation of harm over time and its impact

Probability

- Estimating the likelihood or probability that future harm will occur

Vulnerability

- Age of a child, any disabilities, medical conditions and social isolation

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

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

Appendix 8: Law 422/2002

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

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

Law 422/2002 overview

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

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

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

Who can report?

According to the Article 26 of the law 422/2002 a judge may intervene in a case regarding a child at imminent risk (in the cases mentioned in Article 25 above) on the basis of a complaint filed by:

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

Mandatory reporting

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

- To report such matters to the judicial authorities
- To inform the Ministry of Social Affairs MOSA
- To inform non-governmental organizations NGO (ex: himaya)
- Any person who informs/reports can remain anonymous
- Professional secrecy is lifted when reporting (art. 26, law 422/2002)
- Failure to render assistance to any person in danger could be punished by law (art 567, Penal Code)

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

المادة 25

يعتبر الحدث مهددا في الأحوال الآتية:

1- إذا وُجد في بيئة تعرّضه للاستغلال أو تهدد صحته أو سلامته أو أخلاقه أو ظروف تربيته.

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

3- إذا وُجد متسولا أو مشردا.

يُعتبر الحدث متسولا في إطار هذا القانون إذا امتهن استجداء الإحسان بأي وسيلة أتت. ويعتبر متشردا إذا ترك مسكنه ليعيش في الشوارع والمحلات العامة أو لم يكن له مسكن ووجد في الحالة الموصوفة آنفا.

المادة 26

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

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

لا يعتبر إفشاء لسر المهنة ولا يقع تحت طائلة أحكام قانون العقوبات أي إخبار يقدم إلى المرجع الصالح ممن هو مطلع بحكم وضعه أو وظيفته أو مهنه على ظروف الحدث المعرض للخطر في الأحوال المحددة في المادة 25 من هذا القانون.

المادة 27

للقاضي بعد الاستماع إلى الوالدين أو أحدهما، أن يُبقي الحدث قدر المستطاع في بيئته الطبيعية، على أن يعين شخصا أو مؤسسة اجتماعية للمراقبة وإسداء النصح والمشورة للأهل والأولياء ومساعدتهم في تربيته، وعلى أن يقدم هذا الشخص أو المؤسسة إلى القاضي تقريرا دوريا بتطور حالته. وللقاضي، إذا قرر إبقاء الحدث في بيئته، أن يفرض عليه وعلى المسؤولين عنه موجبات محددة، أن يدخل مدرسة أو مؤسسة اجتماعية أو صحية متخصصة، أن يقوم بعمل مهني ما.

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

Appendix 9: Reporting Form

1. This form will be used when a referral is being made to a child protection organization, such as himaya.
2. It is not necessary to fill in the entire table as the main aim of this form is to facilitate contact with the Child subjected to abuse and his family.
3. This form must remain confidential and must be preserved in a secure location where access is limited to the CPO.

Organization:	**American Community School**
Organization Address:	67 Nigeria Street, Jal El-Bahr, Riad El Solh, Beirut
Child Protection Officer (CPO) name:	
CPO contact:	
STUDENT DESCRIPTION	
Full Name	
Nationality	
Sex	
Age	
Grade	
Address and contact number of child	

FAMILY OF THE CHILD SUBJECTED TO ABUSE

Family Member	Name	Present (Yes/No)	Address & Telephone number
Father			
Mother			
Sibling			
Sibling			
Sibling			
Other			
Other			

About the concern	
Was this a concern/suspicion or a disclosure of abuse?	
Who informed you about the suspicion or disclosure? (Name, position)	
When did the child disclose the incident? (Date & Time)	
Description of incident:	
Date & Time of Incident	
Location of Incident	
Name & job title of alleged perpetrator including relationship to child	
Your personal observations: (visible injuries, child's emotional state etc.)	

Appendix 10: Confidentiality and Data Protection

Confidentiality:

- Confidentiality procedures must be consistently applied to reassure community members that information and records are being respected.
- Failure to protect confidentiality can lead to harm and false rumors.
- In some situations information about a child might be shared against their will for their protection and best-interest. The reason for why should be explained to the child.
- Information should only be passed to the person that is meant to receive this information.
- Need-to-know basis: Limiting access to information that is considered sensitive, and sharing it only with those individuals for whom the information will enable to protect the child.

Paper Records Security:

- Label the files individually using the initials of the child and a code consisting of the Day, Month and year e.g. (XY-DDMMYY) e.g. AS-150217
- At no time should the child's name appear on the outside of the file.
- Kept in a secure place with limited access and locked in a cabinet.
- The room should be locked when the person responsible is not inside of it.

Security of Copies stored on a PC:

- The PC should be password protected and in a room with limited access.
- Updated antivirus should be on the computer.
- All records should be saved in a single folder that is not obvious to find on the desktop
- Records should be labeled using the initials of the child and a code consisting of the Day, Month and year e.g. (XY-DDMMYY) e.g. AS-150217
- All records with sensitive information should be password encrypted on Microsoft Word.
- Passwords should be recorded and saved in the CPO's email using only the label that is common to the written form and the soft copy
- The child's name should not be recorded on the file name or any document that is not encrypted

How to Encrypt a Word Document:

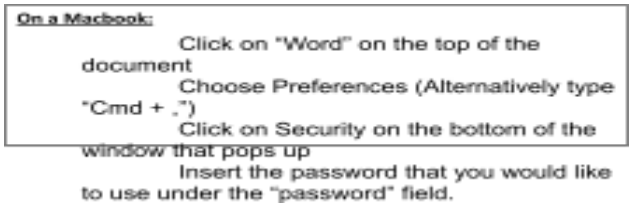
N.B. This process may vary depending on the version of Microsoft Word that is being employed. In case of any discrepancy, kindly search for the steps on Google.com or on Microsoft Word Help (Press F1).

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

1- Click on "File" on the top left corner of the page

2- On the Info tab you will see the "Protect Document" option

3- Click on "Protect Document" and select "Encrypt with Password"



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

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

Appendix 11: Information for Nurse

The CPO should share this basic information with the nurse and clarify the referral procedure.

Confidentiality

As a healthcare professional, it is an ethical and legal obligation to preserve confidentiality and the privacy of patients. This is especially applicable when handling sensitive information about a child's life and when holding sensitive information about violence or an incident of child abuse.

Mandatory Reporting under Law 422/2002:

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

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

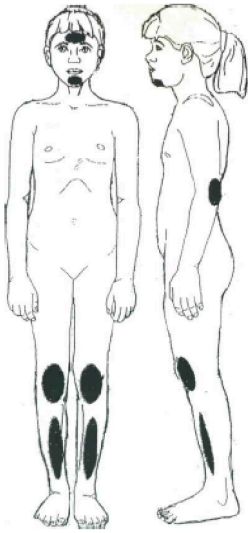
Potential and general clinical presentations of child abuse and neglect:

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

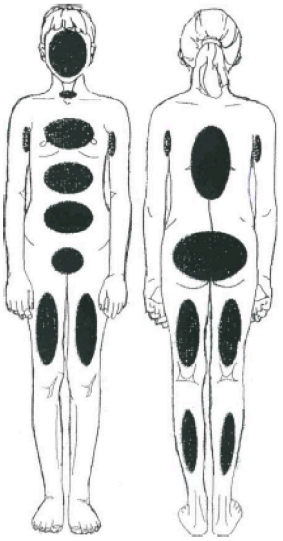
N.B. Some indicators mentioned in the above table are very general and on their own may not be enough to detect child abuse.

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

Normal Bruising



Suspicious Bruising



Building Trust: Child Friendly Communication

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

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

Appendix 12: Job Description of the CPO

Title: Child Protection Officer

Summary of position:

The child protection officer is responsible for handling all issues related to safeguarding children and child protection. This includes managing referrals of alleged abuse, recording allegations, referring child abuse cases to proper authorities, as may be appropriate and after consultation with/approval of the head of school, training faculty/staff and raising awareness on topics related to child protection.

Being a CPO involves a member of faculty or faculty/staff up-taking the outlined responsibilities in addition to their usual duties.

Responsibilities:

- Managing referrals
  - Understand and apply the school's referral procedure.
  - Refer cases to relevant authorities when a child is found to be at imminent risk of harm or when a crime has been committed involving children.
  - Follow-up internally on cases with the support of a multi-disciplinary team and/or with support from a Child Protection organization, depending on the level of risk and the circumstance, while taking the necessary measures to preserve confidentiality.
  - Document reports of potential risk and immediate risk to children, as appropriate
  - Refer cases of immediate risk.
- Collaborating and consulting with faculty/staff, students and parents
  - Assist in any internal investigation of child abuse allegations within the school.
  - Communicate with internal support faculty/staff and child protection organizations, as may be necessary.
  - Act as a source of support, advice and expertise for faculty/staff, students and parents.
  - Ensure that faculty/staff have signed the declaration of commitment to the CPP with the HR department.
  - Support integration of child protection values to existing curriculums within the school.
- Training
  - Lead, or support, in the training of new faculty/staff on the CPP and its procedures.
  - Undergo specialized training with himaya, to develop skills and knowledge relevant to the role.
  - Seek opportunities for development of child protection skills and knowledge (e.g. training, conferences, and online modules).
  - Develop personal knowledge and skills through referring to e-resources.
  - Ensure each member of faculty/staff has access to and understands the CPP and its procedures, especially new and part time faculty/staff.
- Raising Awareness
  - Ensure that the child protection policy is available publically and that community members are aware of the school's role in detection and referral of child abuse and neglect.
  - Encourage a culture of listening to children and taking account of their wishes and feelings

- Ensure that the child protection policy, and its procedures, is being reviewed annually with the CPT and the board of trustees and that its procedures are being implemented.
- Promote activities related to Child Protection within the school.
- Be alert to the specific needs of children with special needs.
- Model positive communication with children.

- Maintaining Confidentiality
- Limit access to information about alleged child abuse cases to relevant individuals and authorities.
- Apply confidentiality and data protection procedures as outlined including password protecting soft copies and storing hard copies in a secure cabinet in a locked room (CPO Appendix 10).
- Encourage faculty/staff and administration to protect information and limit its spread at all times and in all situations.

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

It is advisable for the CPO to be a certified psychologist or counselor, since either occupation helps an individual handle expected cases in terms of skill set and professional training.

Working Conditions:
The CPO will be managing allegations of child abuse, they may have to listen to trauma narratives disclosed by children and may be exposed to potentially distressing situations. In addition, some interventions may be time-sensitive and the CPO will be expected to intervene in a timely manner, even if it is outside working hours. Moreover, the CPO is expected to be in contact with CP organizations and judicial authorities when it's necessary to refer child abuse cases.

Appendix 13: Required Recruitment Checks

Advertisements:

- Mention in job advertisements that ACS has a Child Protection Policy:
- In advertisement: Explicit mention of the CPP at ACS
- In job description: Explicit mention that candidates will be expected to comply with ACS's CPP

Prior to the first interview:

- Provide a copy or link the candidate to the policy on the website before hand
- Pay attention to long or sudden gaps in the individual's working history, and question the reason behind the gap in the interview
- Make sure HR personnel and leadership involved in interviewing are fully briefed on the CPP

During the interview:

- Ask candidate to present the required documents and original certificates
- Question the candidate's:
- Motivation for working with children
- Work history especially reasons for leaving past schools
- Reasons for having working history gaps (if any)
- Response to a suggested child-protection scenario
- Involvement in any previous crimes specifically related to children
- Understanding of the organization's CPP
- Ask challenging questions that can reveal the person's ethic and behaviors:
- Have you worked at an organization with a CPP before? What is your opinion on child protection policies in general?
- Did you get the chance to read our CPP summary and what do you think of it?
- How would it be appropriate to comfort a child? In which situations is this permissible?
- Were you ever in a situation where you had to use physical force with a child?
- Inform the candidate that his/her acceptance is contingent on passing a background check which involves contacting their references, receiving a statement from their past employer and requesting a criminal record.

- End the interview on a positive note!

Conditional offer:

- Remind the candidate that they must accept and commit to the Child Protection Policy by explicitly signing a summary document along with a code of conduct and relevant HR documents.

Background Checks:

- Should a criminal account or suspicious report show up in this background check, the related individual can no longer be considered for recruitment
- Request a national criminal record for the individual applying to any position within ACS:
  - If the individual is a foreign hire, then they must produce an up-to-date [no older than 6 months] criminal record from their last country of residence and from their home country as well when possible
  - Recommended best-practice authorities: Australia – Federal Police Check; Canada – Federal RCMP check; England and Wales – Disclosure and Barring Service (DBS) check or The UK International Child Protection Certificate (ICPC); Lebanon – ISF Judicial/Criminal Record; New Zealand – Police self-check (online version); Northern Ireland – Enhanced Disclosure (Access NI); Republic of Ireland – Garda Check; Scotland – Enhanced Disclosure (PVG scheme); USA– FBI check.
- Request a statement from the candidate's previous employer:
  - A statement from their previous employer saying that, to the employer's knowledge, the candidate was not involved in any inappropriate behavior while employed, especially with children. In addition to answering the following questions:
    - Do you have any concerns at all about this person working unattended with children?
    - Did any of this teacher's colleagues, students or parents express concerns about the teacher?
    - Would you rehire this individual? Why, or why not?
- Require at least two references for the individual's application. These references need to be checked for validity (to make sure they are real, and the contact information is valid)
  - References should always be contacted
  - References should never be a family member of the applicant or, in a close relationship with the individual

Employment:

- Ensure that all the documents requested have been received and that the background checks (criminal record and reference checks) have been completed.
- Implement an induction that has time dedicated to explaining the child protection policy
- Ensure that the candidate is registered to receive a CPP training

Employee File:

- Store all relevant information securely in a locked cabinet (if hard copy) or a password-protected secure computer (if soft copy) in a room with limited access.
- Organize document for easy retrieval

Appendix 15: Guidelines for Internal Personnel Investigations

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

Internal Investigations

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

Purpose of Investigations

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

When there are allegations of criminal conduct then the school may be required by law to report to the appropriate national or governmental agency or judicial authorities; the school will not conduct or continue an investigation in these instances (for instance, if there is alarming evidence of an employee producing child pornography; emerging evidence of sexually grooming children; or conduct of criminal offenses such as illicit drug dealing...)

Internal investigation committee:

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

Composition:

The investigation committee may be composed of some of the following persons:

- The Head of school
- Principal
- Child protection officer(s)
- A member of the board of Trustees
- Faculty member(s)
- Human Resources Manager/Officer
- Member from Administration
- A legal advisor (when necessary)

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

Responsibilities:

The person(s) conducting the investigation should seek to:

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

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

Lead Investigation Officer:

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

1. Preparation:

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

2. Gathering evidence:

The inquiry team will gather all available information and evidence including: the initial report and any other available information (camera footage, photographs, security records etc.).
Preliminary assessment: threat of harm
An initial assessment should be done by this stage to determine if there is an ongoing threat of harm. If the person under investigation poses a risk of harm to other employees, children or the public then steps should be taken to prevent this. For instance, if a person that has regular contact with students is being accused of inappropriate behavior with children then the school may choose to temporarily reassign the person or suspend them pending the findings of the inquiry. In contrast, if the accusation is based on an action in the past and it is unlikely that the accused will pose any harm to others then it may be unnecessary to intervene. In both cases, the characteristics of the accusation (nature, severity, etc.) should be used to clearly justify a preventive action by the school.

3. Conducting interviews:

The inquiry team will meet with concerned individuals including: the reporter, the subject of investigation, the child subjected to abuse, his/her parents (when applicable) and any relevant witnesses. Inquiry team members should always be mindful of the “do no harm” principle, therefore should not set meetings with individuals if it is deemed unsafe.
General guidelines for interviews:

- Interviews should be carried out as soon as possible
- A familiar venue and suitable time should be selected to reduce stress
- Each person should be interviewed individually
- At the start of an interview, a general explanation of the purpose of the investigation should be provided
- At the start of the interview, highlight to all parties that the discussion is confidential
- Intimidation techniques are not acceptable during an interview, rather, individuals must be encouraged to express themselves openly
- At the end of the interview, the interviewee should be informed of the next steps and what is expected of them – if anything

Involving students in investigations:

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

Guidelines for asking questions:

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

- What happened?
- Who was the alleged harasser/perpetrator?
- Where did the incident occur?
- When did the incident occur?

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

Documentation:

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

4. Evaluating evidence:

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

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

5. Writing a Report

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

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

6. Determining next steps:

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

Further Considerations

Confidentiality

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

Failing to ensure confidentiality can lead to:

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

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

Data Storage

Documents relating to an investigation will be retained, in a secure place, by the school together with a written record of the outcome of the inquiry and, where disciplinary action has been taken, retained on the member of faculty/staff's, or student's, personal and confidential file in accordance with the school's disciplinary procedures. Anything documented will be stored securely in a password-protected folder on a password-protected computer. Anything printed will be stored securely in a folder placed in a locked drawer with limited access.

Protecting reporters

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

Support for individuals under investigation

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

- Inform them of concerns or allegations as soon as possible
- Provide an explanation of the likely course of action
- Provide them with clear explanations as to the process
- Explain confidentiality and steps being taken to maintain it
- Explain their obligation to maintain confidentiality and not share information discussed

Suspending the individual under investigation

The Principal and Head of School in consultation with the CPO (if applicable) will determine whether or not the employee should be suspended during the investigation according to, but not limited to the following reasons:

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

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

False allegations

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

Child:

If after the investigation it is determined that the child has made a false allegation of abuse, this could be an indicator of problems elsewhere which requires further exploration via counseling or referral to an external professional.
If it is clear that the allegation has been made maliciously, then the Head of School, in coordination with the CPO, should consider whether or not it is appropriate to implement the school's disciplinary procedure against the student.

Faculty/Staff:

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

Communicating with parents

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

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

Communicating with the community after an incident

When an incident occurs at the school, the reputation of the school can become compromised due to negative publicity. How an organization reacts to such incidents is critical. The school is advised to consult with counsel to determine what message they want to convey and highlight any limitations on the school's commentary.
In general, a statement should contain: a brief description of the event (without divulging the identities of the concerned persons), the actions the school took and a reassurance that there is no current risk to children at the school. The school should highlight that it acted quickly and transparently using its policies and procedures including the child protection policy.

Appendix 16: Video Consent Form

ACS Beirut has adopted a Child Protection Policy to guide our staff and families in matters related to the health, safety and care of children in attendance at our school. The ACS Child Protection Policy is based on international law, Lebanese law and on the United Nations Convention on the Rights of the Child of which Lebanon is a signatory.
As part of our overall educational programs and specific to our shared responsibility to educate children, to protect them, and to learn and grow in a safe environment, ACS faculty and staff receive annual training with regards to safeguarding our students and Child Protection with the focus on recognizing and reporting issues of abuse and neglect.
During Virtual Learning, ACS is committed to providing students with the same level of excellence in education, by offering all classes online, teachers' feedback, meetings with students and parents.
We also count on parents' support and flexibility as parents are essential partners in their children's education. As such, we need, in partnership, to create a positive distant learning experience and to keep our students safe.

School Responsibilities

While ACS policies, rules and regulations, including the Child Protection Policy and the Code of Conduct, apply in all environments, some of them need to be adapted to the Virtual Learning environment
Dress code: students are expected to be in appropriate dress code as per school dress code policies.
Space: students are expected to be sitting in a common space at home within the earshot of an adult.
Attendance: students are expected to attend all online classes, and to be there on time. If for any reason, the student cannot attend an online class, parents need to email the teacher.
Online Platforms: The school is committed to using school sponsored platforms within all the online communications that take place in Virtual Learning. Examples include but not limited to: Google Suite for Education, School's Seesaw accounts, Zoom.
The wellbeing is of utmost importance to us at ACS Beirut, therefore we are committed to a well developed and a well sought program for students during Virtual Learning. One of the ways to track students' skills acquisition, skill performance and provide feedback for growth is through videos and/or pictures shared on the school's platforms. Therefore teachers will be asking students to videotape and/or take pictures of themselves performing the skills and sending them to our school platforms.

As a school, we will be taking the following measures to ensure the safety of our students by implementing the following measures:
The videos and pictures will be secure and with limited access to your child's teacher, the head of department, divisional principals and the counselors.

The videos and/or pictures will be viewed by your child's teacher for evaluation, and your child will receive feedback.
The videos/pictures will be deleted from the ACS database after the final grading period.
As per the Child protection Policy and the ACS Code of Conduct available on ACS website, should any misuse of data occur, there will be disciplinary actions against the staff/faculty member(s) responsible.

As a school, we need your support in ensuring the safety of our students is met, by:

- Making sure that your child is performing the activity in a safe space.
- There's an adult in the room or within close proximity (within earshot).
- Making sure that your child is sending the video/picture on the above mentioned school approved platforms

The video consent form and guidelines below recognizes that the welfare and interest of children are paramount in all circumstances. It aims to ensure all children have a positive and enjoyable experience of participation in the learning activities at ACS, in a safe and child centered environment, and are protected from abuse whilst participating in the learning activities.

I _____ give permission for my child _____ in grade _____ to submit photographs and/or videos for learning activities and assessment purposes.

I _____grant full rights to use the images resulting from the photography/video filming, and any reproductions or adaptations of the images strictly for assessment and learning purposes. The images mentioned will be strictly shared and used through the school's online platforms, and are subject to all data protection policies that are put in place at ACS.

I understand that these videos and images for learning purposes and assessment, will not be used in their printed and online versions in social media, press releases and other venues.

I authorize ACS Beirut to use both my child's image and videos as portrayed above.

Name: _____

Signature:_____

Date:_____