

RHHS CHILD PROTECTION POLICY

Date established: June 2025

RAFIC HARIRI HIGH SCHOOL (RHHS)

Child Protection Policy

This policy was established and adopted in June 2025 by Rafic Hariri High School in partnership with himaya and will be reviewed on a biannual basis, unless there is a need for an immediate change in policy.

- The designated Child Protection Officer (CPO) is Mrs. Nancy Karout.
- The designated CPG (Child Protection Group) members are: the school principal, CPO, Head of divisions, floor supervisors, activities coordinator, maintenance supervisors, nurses, operations and logistics coordinator, and HR.

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Acronyms

CPP – Child Protection Policy

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

CPO – Child Protection Officer

CPG – Child Protection Group

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

MoSA – Ministry of Social Affairs

Glossary of Terms

Allegations

Refers to any concern that an adult working in school has: 1) behaved in a way that has harmed¹ a child, or may have harmed a child, 2) possibly committed a criminal offense against or related to a child, 3) behaved towards a child or children in a way that indicates they may pose a risk of harm to children, 4) behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Best Interest of the Child

The right of the child to have his or her best interests assessed and taken as a primary consideration in reaching a decision. It refers to the well-being of a child and is determined by a variety of individual circumstances (age, level of maturity, the presence or absence of parents or caregivers, the child's environment and experiences).

¹ Harm includes physical, emotional, sexual abuse and neglect and refers to actions carried out both in person and online.

Bullying

The recurrent use of intimidation or coercion unto a peer. It's a form of aggressive behavior that is characterized by the existence of a power imbalance, hostile intent and recurrent behavior.

Child or Children

In Accordance with the United Nations Convention on the Rights of the Child and Lebanese Law 422/2002., child means any human under the age of 18 years, a “child” is defined as any human under the age of 18 years.

Child Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

Sexual abuse refers to **any form of sexual activity** or act with a child by an adult or by another child who is in a position of responsibility, trust, or authority over the child.

Child Psychological Abuse

A pattern of aggressive and negative interaction with a child, which includes attitudes, behaviors, or hostile speech, and can seriously interfere with a child's cognitive, emotional, psychological or social development.

Child Neglect

The ongoing failure— to meet the child basic needs (food, clothing, shelter, medical care, education, emotional support and supervision) to the degree that the child’s health, safety, and wellbeing are threatened with harm.

Child maltreatment

Child maltreatment: is the abuse and neglect that occurs to children under 18 years of age. It includes all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

Child Protection

An activity or initiative designed to protect children from any form of harm, particularly that arising from child abuse, neglect and exploitation.

Child Safeguarding

The responsibility that school have is to make sure their staff, operations, and programmes do no harm to children. It includes policy, procedures and practices to prevent children from being harmed by the school as well as steps to respond and investigate when harm occurs.

Child-Centered Approach

A child-centered approach in school-based ensures that all interactions, decisions, and interventions prioritize students' best interests, safety, and well-being by fostering a secure and inclusive environment, respecting children's rights and personal boundaries, encouraging their participation and voice, equipping school personnel with essential safeguarding knowledge, and establishing clear reporting mechanisms for effective intervention and support.

Child-friendly

Working methods that do not discriminate against children and that take into account their age, evolving capacities, diversity and capabilities. These methods promote children’s confidence and ability to learn, speak out, share and express their views. Sufficient time and appropriate

information and materials are provided and communicated effectively to children. Staff and adults are approachable, respectful and responsive

Child well-being

A dynamic, subjective and objective state of physical, cognitive, emotional, spiritual and social health in which children are: 1) safe from abuse, neglect, exploitation and violence; 2) have their basic needs, including survival and development, met; 3) are connected to and cared for by primary caregivers; 4) have the opportunity for supportive relationships with relatives, peers, teachers, community members and society at large, 5) have the opportunities and elements required to exercise their agency based on their evolving capacities.

Confidentiality

The obligation that information about an individual will not be disclosed or made available to unauthorized persons without prior permission. There may be limits on confidentiality for children in accordance with their best interests as well as mandatory reporting obligations.

Do No Harm

The principle of “Do No Harm” emphasizes the responsibility to take all necessary precautions to ensure that children who have experienced harm or abuse are not subjected to further risk due to our actions when providing assistance. This requires safeguarding them from additional harassment, intimidation, retaliation, trauma, or abuse.

Informing or Notification (non-judicial)

Any call received by the concerned bodies of the Ministry of Social Affairs or its contracted partner organizations specialized in child protection or organizations working with juvenile refugees from any person who has Alarming Facts or Information which, he/she believes, threaten the safety and development of a juvenile.

Imminent Risk

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

Law 422/2002

The Lebanese Law No. 422/2002 titled 'Protection of Children in Violation of the Law or Exposed to Danger' attaches special importance to the principle of the best interest of the child. It was the country's first self-contained child protection legislation. It established civil juvenile courts, juvenile judges, and social workers for case management.

Potential Risk

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

Reporting

Any direct call with the judicial system through the judicial police or the juvenile judge or through a written statement to the public prosecution, or any call to the offices of the social representative mandated by the Ministry of Justice, present in all governorates. Specific contact with the judicial system for the purpose bringing a case to the attention of the judicial police, juvenile judge(s), public prosecution, or offices of the social representative mandated by the Ministry of Justice.

Standard Operating Procedures (SOP)

A set of instructions that describe the steps to be followed by all professionals working on the protection of juveniles in Lebanon, as well as the activities to be carried out.

Suspicion of child abuse

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

Policy Statement

“Fostering a Safe and Protective Environment for Every Student”. At Rafic Hariri High School, the safety, wellbeing, and dignity of every child are at the heart of everything we do. This Child Protection Policy (CPP) reflects our unwavering commitment to creating and maintaining a learning environment where all children feel safe, respected, valued, and empowered. We believe that every child has the right to be protected from harm, and that safeguarding is a shared responsibility that involves the entire school community.

This policy aims to ensure that all staff members are equipped with the knowledge, skills, and confidence to recognize signs of abuse or neglect, respond appropriately, and fulfill their protection-related responsibilities effectively. It also emphasizes the importance of fostering a culture in which students are encouraged to participate actively in decisions that affect them and feel confident in seeking help when needed.

We recognize that children’s safety and wellbeing are influenced by various social, emotional, and economic factors, and that effective protection requires collaboration beyond the school setting. Therefore, we are committed to working closely with parents, caregivers, and external partners to provide coordinated and holistic support to children and families.

This policy outlines the principles, procedures, and responsibilities that guide our approach to safeguarding and child protection and reaffirms our commitment to upholding children’s rights and promoting their holistic development within a secure and inclusive school community.

Policy Scope

All students enrolled at Rafic Hariri High School are protected under the procedures outlined in this Child Protection Policy (CPP), both within and beyond school premises. "School grounds" encompass all geographic locations and facilities associated with the school, including buildings, classrooms, courtyards, transportation services (such as buses and vehicles), and any location used for school-related activities or events, including trips. Any incident of violence occurring off school grounds that becomes known or evident within the school setting will be addressed in accordance with the policy's procedures to ensure the student's wellbeing. This policy applies to all individuals working within or on behalf of the school, including teaching and non-teaching staff, supply staff, volunteers, contractors, and trustees, regardless of whether they work directly with children. Understanding and adherence to the CPP is mandatory, and all staff receive training on its contents and their roles and responsibilities. As a core component of our safeguarding and protective culture, this policy and its procedures are reviewed and updated at least once every two years to reflect changes in legislation, guidance, and best practices, reinforcing our commitment to maintaining a safe and supportive environment for all students.

Policy Purpose

The purpose of this Child Protection Policy (CPP) is to affirm Rafic Hariri High School's unwavering commitment to safeguarding the safety, dignity, and wellbeing of all students. The school recognizes that children can only thrive, academically, emotionally, and socially, within an environment where they feel safe, respected, and supported by the adults and systems around them. This policy establishes a clear, structured, and proactive framework to prevent, identify, and respond to all forms of child abuse, neglect, and violence affecting students within the school community. It seeks to embed a culture of safeguarding at every level of school life, where child protection is embraced as a shared and continuous responsibility.

The policy defines protective procedures, outlines key roles and accountability mechanisms, and mandates comprehensive training for all staff, educators, administrators, nurses, volunteers, and visitors to ensure they understand their responsibilities and legal obligations. It targets a range of child protection concerns, including but not limited to physical, psychological, and sexual abuse, neglect, bullying (including cyberbullying), exposure to domestic violence, harmful content, and other forms of harm, whether occurring inside or outside the school setting. It further acknowledges the significant impact such experiences can have on a child's development, learning, and mental health. While recognizing legal distinctions between corporal punishment and physical abuse, the policy affirms that both have harmful consequences and must be addressed.

To operationalize this commitment, the school has established a Safe Practices Framework that includes the designation of a Child Protection Officer (CPO), the establishment of a Child Protection Group (CPG), and the implementation of rigorous recruitment and screening procedures. It also ensures the existence of confidential, safe and accessible reporting channels for timely detection and referral of suspected or disclosed cases of child abuse or misconduct.

Finally, this policy reflects the collective pledge of the entire school community to uphold the best interests of the child in all school-related matters. By promoting widespread awareness, involving children in their own protection, and fostering active engagement from parents and community stakeholders, the policy reinforces collective accountability and supports the development of life skills that reduce children's vulnerability and enhance their long-term wellbeing.

Overview of the policy

This policy has been jointly developed by himaya and Rafic Hariri High School in alignment with a child rights-based approach, as outlined in the United Nations Convention on the Rights of the Child (UNCRC), ratified by Lebanon on May 14, 1991. Grounded in the principles of non-discrimination, participation, and the best interests of the child, it affirms that every child is a unique rights-holder entitled to protection, care, and opportunities for development within a safe and supportive environment. The policy reflects Rafic Hariri High School's unwavering commitment to uphold the highest standards of child safeguarding, integrity, and accountability. It is rooted in both international and national legal frameworks, particularly UNCRC Articles 19 and 34, which emphasize the child's right to protection from all forms of violence and sexual exploitation. Nationally, the policy is guided by the Lebanese Constitution (Preamble, Paragraph B), which affirms Lebanon's commitment to the Universal Declaration of Human Rights and international treaties; Lebanese Law 422/2002 on the Protection of Children in Conflict with the Law and/or at Risk, specifically Articles 25, 26, and 27, which define protective measures and judicial procedures for children exposed to risk, including abuse and exploitation; and the National Standard Operating Procedures for the Protection of Juveniles in Lebanon, adopted by the Ministry of Social Affairs in 2016, which establish a multi-sectoral framework for case management and child protection interventions. Additionally, it draws upon relevant articles of the Lebanese Penal Code, including Article 205 on the age of legal responsibility, Article 504 criminalizing rape, and Article 505 addressing sexual acts with minors. As a key partner, himaya, a Lebanese non-governmental organization established in 2008, contributes its technical expertise and nationwide services spanning prevention, psychosocial support, capacity building, advocacy, and research to ensure the effective implementation of this policy and the safeguarding of every child's wellbeing.

Ethos

Rafic Hariri High School is committed to fostering a safe, inclusive, and collaborative learning environment that supports the holistic development of every student, cognitively, socially, emotionally, physically, and ethically. Aligned with the school's mission and guiding principles, this commitment is operationalized through systems, structures, and values that promote wellbeing and safety across all aspects of school life.

A protective and nurturing school environment extends beyond academic excellence to include safe physical infrastructure, secure transportation services, nutritious food options, and respectful interpersonal relationships. To ensure the sustainability and safety of these elements, Rafic Hariri High School pledges to regularly assess and improve the following in accordance with the **School Security, Crisis, Safety & Health Management Plan**:

- **Physical infrastructure:** including electricity, hygiene, building maintenance, and safe access to all facilities.
- **Transportation services:** including the evaluation and training of school drivers, regular vehicle maintenance, and child-safe protocols.
- **Nutrition and food services:** ensuring balanced, healthy meals and adherence to food safety and hygiene standards.

Rafic Hariri High School places strong emphasis on child-friendly, respectful, and safe communication between staff and students. All direct contact with students—whether verbal, non-verbal, physical, or digital—must adhere to clear safeguarding standards that respect each child's personal space, dignity, and developmental needs. Staff are expected to maintain professional boundaries at all times and to foster a supportive atmosphere where students feel comfortable expressing concerns related to their wellbeing or safety.

The school also carefully monitors **indirect contact with students**, particularly in relation to the collection, use, storage, and dissemination of student data and images. This includes access to academic records, health information, and the use of student photos or videos for internal and

external purposes, including social media, school publications, or promotional materials. Prior informed consent from parents or legal guardians and students (upon their age) is required before using or sharing any student-related media or information, in accordance with national data protection standards and ethical best practices.

To further strengthen its protective environment, Rafic Hariri High School promotes **horizontal, transparent communication** that is free from hierarchical barriers and empowers children to speak openly. This approach helps dismantle taboos and fear around child protection issues and reinforces a culture of trust, transparency, and accountability.

Rafic Hariri High School fully recognizes the critical role educational institutions play in safeguarding children's rights and wellbeing. As part of its child protection strategy, the school adheres to the Ministry of Social Affairs (MoSA) recommendations and has partnered with **himaya**, a specialized child protection organization, to support the development, adoption, and implementation of a comprehensive Child Protection Policy. This policy defines expected and unacceptable behaviors, outlines reporting and referral mechanisms, clarifies legal obligations, and promotes protective practices throughout the school community.

When implemented effectively, this policy helps create a child-friendly environment that prevents harm, promotes resilience, and establishes a clear system to detect, report, and respond to violations. Rafic Hariri High School is committed to ensuring that any breach of children's rights is taken seriously, that perpetrators are held accountable, and that the school remains a safe place where all children can learn, grow, and thrive.

Child Protection Policy Structure

A. Child Protection Group (CPG)

The child protection group (CPG) stands to monitor effective implementation of the policy throughout the school and promote a safer school environment via activities throughout the academic year.

To ensure all community members are represented, the CPG is made up of the following:

The school principal, CPO, heads of divisions, floor supervisors, activities coordinator, maintenance supervisor, nurses, operation and logistics coordinator, and HR.

The CPG responsibilities are as follows:

- Overseeing the completion of the training required by all teachers, staff, students and CPG members annually.
- Ensuring all terms of the CPP, within Rafic Hariri High School jurisdiction, are respected (school ground, facilities buses, school events and field trips organized by the school).
- Identifying activities throughout the academic year that promote the CPP or promoting a theme related to child development or child protection.
- Overseeing the continuous completion of monitoring and evaluation of the policy content and its application in Rafic Hariri High School and by the community members.
- Communicating community members' needs to himaya or other relevant organizations for action, when needed.
- Identify any concerns or factors that may negatively impact the wellbeing of students at Rafic Hariri High School, including those related to physical infrastructure, nutrition, or any other aspect of student safeguarding and overall welfare."
- Ensure that there is an active CPO throughout the academic year and nominating a replacement when needed.

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

B. Child Protection officer (CPO)

The designated child protection officer (CPO) is the assigned officer responsible for receiving all witnessed or suspected cases of harm against a student within Rafic Hariri High School, this excludes cases of student misconduct, which are primarily handled by the Head of Section. However, the Child Protection Officer (CPO) will be kept informed as needed, depending on the nature, frequency, or recurrence of the incident, ensuring continuous coordination in the best interest of the student. Handling of cases or reporting will depend on who the allegation of child abuse is against, also to be detailed later.

The CPO's responsibilities are as follows:

It is preferable that the Child Protection Officer (CPO) be either the school social worker or counselor, given their expertise in child wellbeing. In cases where the CPO is a different designated staff member, that individual must receive intensive training to ensure they possess the necessary skills and competencies to handle cases with a child-centered, do-no-harm approach, and to act in the best interest of the student subjected to abuse. What is most important is that all incidents and records remain confidential and that the privacy of students is respected at all times (Appendix 5 identifies recruitment requirements and preferred characteristics for the CPO.)

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

The CPO is required to fill in a "reporting form" (CPO toolkit, Appendix 9) for a reported case that shows a child is facing potential risk or imminent risk. The forms will be kept as records for all reported cases of violation against children within Rafic Hariri High School. Soft copies should be password encrypted when they are sent to child protection organization (CPO toolkit Appendix 10). Any hard copies and written information should remain secure in a locked locker or cabinet at all times in a room with limited access to guarantee confidentiality (CPO toolkit Appendix 10). They will be used whenever external organizations need to be sought out for help managing a case, and for monitoring and evaluation purposes.

Cases of abuse allegations outside the school premises are handled by the CPO. However, cases of abuse allegations against Rafic Hariri High School staff are reported to the CPO, who in turn immediately hands it over to the principal. The CPO can be part of the investigative committee but does not directly handle the case.

In cases of bullying within the school premises, the CPO is not directly reported to and **does not take** disciplinary measures, however the CPO should be informed by the head of division on cases of bullying. Cyberbullying however falls under child abuse, and such cases will be handled by the CPO, in coordination with the principal. Cases of misconduct, such as fighting between students and school premises, are not handled by the CPO, but rather by the head of division, and disciplinary measures are taken in accordance with the disciplinary procedures.

C. Principal

The principal plays a pivotal role in leading and overseeing all child safeguarding efforts within the school. This responsibility includes ensuring that safeguarding procedures, protocols, and protection mechanisms are effectively implemented and consistently followed by all staff and members of the school community. Safeguarding and protecting students is not only a fundamental obligation but also a core responsibility of the principal—equal in importance to the school’s educational mission. As part of this mandate, the principal is also accountable for addressing any incidents involving misconduct by staff members toward students that fall within the scope of safeguarding violations. In such cases, the principal must take timely and appropriate measures, which may include internal disciplinary actions (such as suspension), and when necessary, initiate referrals to relevant judicial or legal authorities, in line with national child protection laws and school policy.

Furthermore, the principal handles cases of student misconduct, including bullying, and needs to share major cases with the CPO. When it comes to cases of child abuse, the principal will be informed by/ and at times collaborate with the CPO on proper responses.

The principal also has additional responsibilities of:

- Ensure that all programs and activities organized by the school or conducted within its premises—whether on-site or off-site—strictly adhere to established safeguarding and

protection standards. This includes upholding safety, security, and ethical conduct in all interactions involving students.

- Following up on case management whenever a student is deemed to be in immediate danger and requires referral, i.e., collaboration with specialized child protective organizations (e.g., UPEL or himaya), and/or reporting and informing the relevant authorities.
- Taking decisions concerning breaches to the CPP by any member of the Rafic Hariri High School community, and leading discussions for appropriate response as per Rafic Hariri High School code of conduct.
- When necessary, notify the parents of the student, along with the CPO.

D. Staff

All staff members are required to participate in himaya's training, which covers key themes related to child protection and safeguarding, including the core principles, procedures, and general guidelines necessary for the effective implementation of the Child Protection Policy. As such, Rafic Hariri High School staff will be sensitized to the reality of violations of children's rights, the consequences of these violations, Lebanese law for child protection, legal obligations and expected roles of teachers and staff in detecting cases, the CPO responsibilities and the referral pathways to be used within the school.

Staff responsibilities are as follows:

- Read, understand and sign agreement to the CPP, keeping a copy of it for their personal reference. It is encouraged that while reviewing the CPP, staff members bring forward their concerns and questions to the CPO.
- Respect and uphold the Child Protection Policy (CPP) by actively contributing to the creation of a safe and protective school environment that supports the wellbeing and positive outcomes of all students. This includes maintaining professional boundaries at all times, such as refraining from adding students or their family members on personal social media platforms, and ensuring interactions remain appropriate, respectful, and aligned with safeguarding principles.

- Report all witnessed and/or suspected cases of harm against a student that occurred within or outside school grounds. Reporting a case should follow the guidelines “**disclosure of abuse - referral map**”.
- Request support from potential partners through the established CPG for technical support and empowerment for themselves and students. Possible responses may be training sessions, school wide activities or talks from professionals.

E. Nurse

The school nurse is in the position to identify signs and symptoms of abuse, as the nurse interacts with students in a private area and may examine them if appropriate.

Therefore, the nurse may be in a position where she may notice clinical indicators of abuse (physical, psychological, sexual and/or neglect indicators). The nurse will be provided with more information and general guidelines on suspicious bruising and signs by the CPO (CPO Appendix 11). The nurse should consult with the CPO whenever there are suspicious signs on the student or if she receives a disclosure.

The nurse is expected to preserve the privacy of any patient/Student during examination and to protect confidentiality of any information provided. The nurse is expected to follow the defined pathways of the CPP like all staff and to reveal any sensitive information that may either indicate or confirm child abuse to the CPO.

F. Human Resources

In line with staff roles and responsibilities, Human Resources (HR department) is expected to ensure the required recruitment checks (Appendix 3) are carried out. This primarily includes ensuring that staff members are free of previous child-related offences. HR is also expected to mention the CPP when possible, in future job posts, to ask prospective candidates to review the CPP before an interview and to address the CPP during the interview. The HR department will also ask new staff members and any volunteers, interns or shadow teachers to sign the following **declaration of commitment to Rafic Hariri High School staff's CPP**, which was developed in partnership with himaya:

I, the undersigned (Full name) ..., having read and understood the principles and basic standards of the Child Protection Policy for Rafic Hariri High School staff developed in partnership with himaya, agree to implement the policy throughout the time I am affiliated with the school.

G. Rafic Hariri High School's Community

Rafic Hariri High School acknowledges that families are the foundation of a child's wellbeing and development. Parents and guardians play a vital role in safeguarding their children and are considered essential partners in maintaining a safe, supportive, and protective school environment. To strengthen this partnership, the school will actively engage families through regular awareness sessions aimed at deepening their understanding of child protection principles, preventive measures, and the key components of the Child Protection Policy (CPP). These sessions promote shared responsibility, encourage open communication, and foster a strong alliance between parents and school leadership to ensure a nurturing and secure environment for all students.

In support of this approach, the Child Protection Group (CPG) and Child Protection Officer (CPO) will remain available to parents and guardians to address concerns related to student wellbeing. This includes identifying potential risks, exploring intervention options, and facilitating referrals to specialized professionals when necessary. Maintaining open and accessible channels of communication with families is essential to building a child-centered, preventive protection culture.

The scope of the CPP extends beyond school staff and families to include all individuals who may interact with students—such as volunteers, interns, and visitors. Anyone with direct or ongoing contact with children must receive a clear briefing on the CPP, outlining their roles, responsibilities, and expected conduct. While short-term visitors or guest speakers are not required to undergo full training, they must be accompanied at all times by trained staff to ensure compliance with the policy. Specific protection procedures and risk mitigation measures for volunteers and visitors are detailed in Appendix 4.

Rafic Hariri High School also promotes full transparency in its child protection efforts. The school's safeguarding commitments, procedures, and good practices, as outlined in the CPP, will be made publicly available via the school's website and other communication platforms. This ensures that parents, guardians, and all community members—including external partners involved in student activities—are well-informed and understand the

importance of adhering to child protection standards.

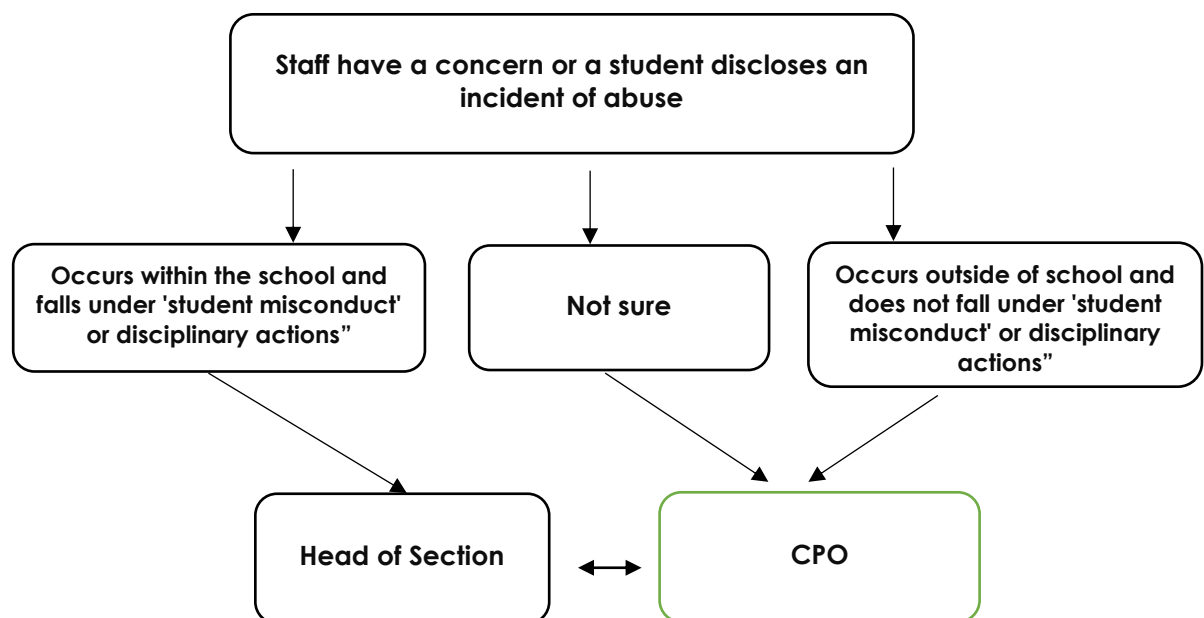
Ultimately, safeguarding is a shared responsibility. All members of the school community—including staff, parents and guardians, volunteers, visitors, and students—are expected to:

- Recognize and appropriately respond to any suspicion or observation of harm toward a student.
- Understand and follow the correct procedures for reporting concerns or disclosures to the designated Child Protection Officer (CPO).

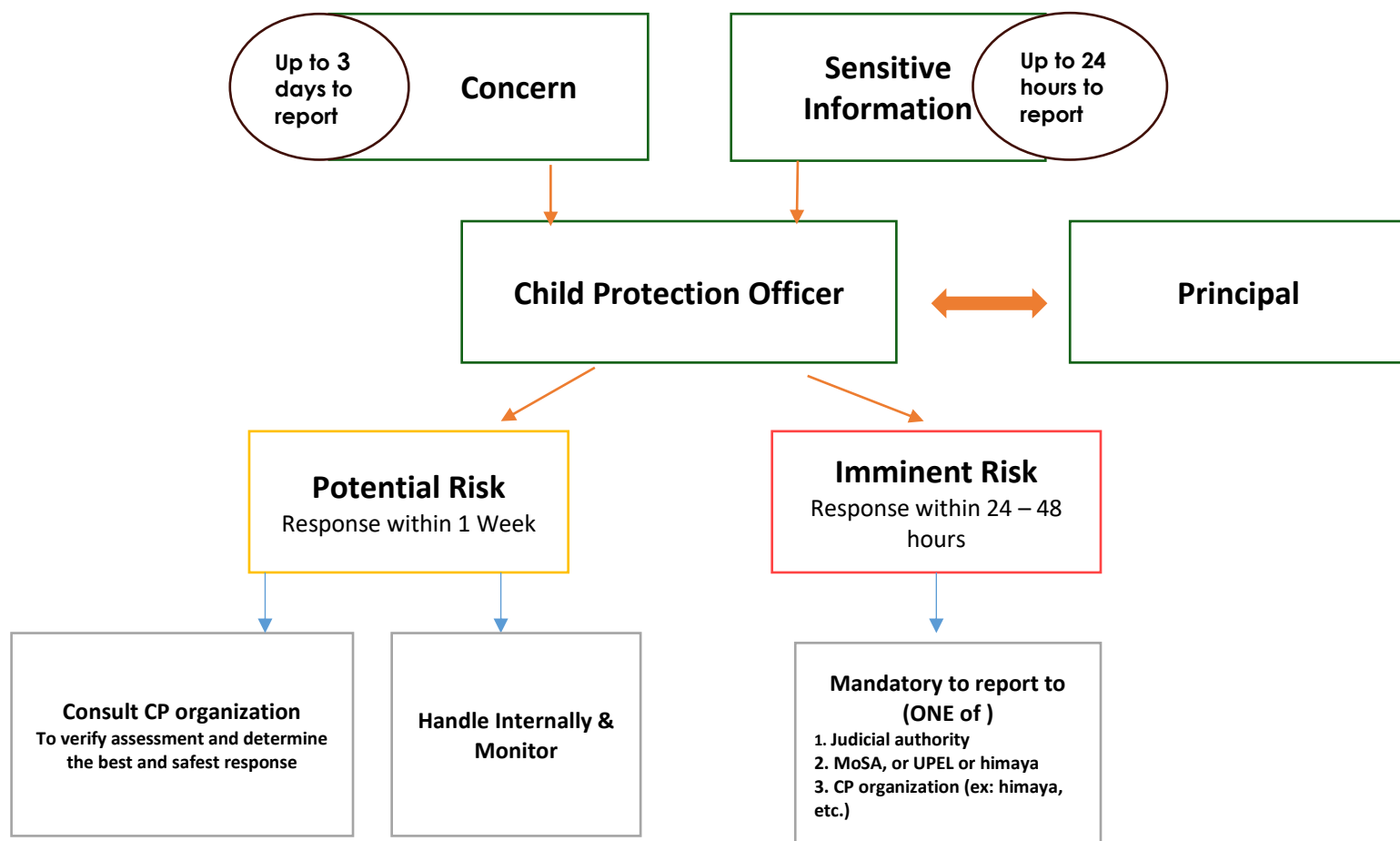
Through this inclusive, transparent, and collaborative approach, Rafic Hariri High School is committed to upholding the highest standards of child protection and ensuring that every child feels safe, valued, and protected.

Reporting child protection concerns

Disclosure of abuse - referral map – Rafic Hariri High School staff and Community members



Child Protection Flowchart



If the staff member feels that the student is at imminent risk, then they must immediately report this to the CPO within 24 hours, otherwise, the staff member will need to report the incident within 3 days.

Recall that imminent risk is when the child's wellbeing is at risk and requires immediate intervention i.e., a disclosure of sexual abuse.

When the issue is that of student misconduct, within the school, and requires disciplinary measure as per the school code of conduct, staff need to inform the head of division. It will then be the responsibility of the head of division to share info with the CPO on this incident i.e. if there is a case of bullying in the school between two enrolled students.

If the issue is related to cyberbullying, then it should be directly reported to the CPO.

If the issue is related to staff (safeguarding-related behavior or misconduct), then it should be directly reported to the CPO.

Cases of allegation against staff are to be reported to the CPO, who in turn **will refer** the matter to the principal. In such cases, the Child Protection Officer (CPO) will be informed; however, the **responsibility** for leading the investigation lies with the principal or the relevant designated professionals. It is not within the CPO's role or mandate to conduct investigations. The primary responsibility of the CPO in these situations is to support the student, ensure their rights are upheld throughout the process, and guarantee that no harm is caused to the student as a result of any actions taken.

If the issue is related to the family of the student or has occurred outside of the school grounds, this should be directly reported to the CPO and should not be further discussed with other staff members to preserve confidentiality.

If a staff member who suspects child abuse is uncertain of the correct response, then they should approach the CPO directly in order to preserve confidentiality. The CPO will then determine the correct response/course of action or the relaying of information and case to the principal or to the concerned person (i.e.: head of section), depending on the case as per this policy.

When an incident or suspicion is reported by staff, the situation will then be assessed by the CPO, in coordination with the principal, when needed, to determine the response or course of action.

The severity of any incident will be determined by the CPO using the classification of risk described in Appendix 2. The best response will depend on the classification of the risk and can be discussed with a child protection organization, depending on its severity.

When an allegation or disclosure of harm is made by a student, the staff member should:

- Choose a quiet place to speak with the student, ensuring the door remains open at all times for safety and security purposes
- Stay calm and listen carefully (active listening)
- Reassure the student that he/she has done right by speaking up
- Reinforce the notion that the student has the right to be safe

- Avoid investigative and leading questions
- Inform the student that the case will be referred to the CPO
- Do not promise the student secrecy concerning the case he/she has shared, but to ensure his/her privacy and confidentiality will be respected as the case will be only discussed with the CPO and whoever is legally to know
- Make the referral to the CPO following the referral pathway and the child protection flowchart.

Staff members receiving a report should **not**:

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

After a report is made, staff members that report a case either by observing signs/symptoms or receiving a disclosure from a student **should not discuss the case any further**. A reporter may only obtain information from the CPO on whether the case was followed up on.

When staff members are in further contact with a student that has disclosed sensitive information to them, they should attempt to normalize the classroom's environment. Ideally the staff members should:

- Act normally with the student in the classroom
- Avoid mentioning sensitive details in anyway in front of the class
- Develop the student's belonging in the class and ensure their inclusion as much as possible
- Preserve the confidentiality of the student
- Positive reinforcement by supporting positive behaviors and highlighting the strengths of the student
- Listen to the students if they wish to discuss their feelings or the incident

- Report to the CPO if there is no improvement with the student or if the student seems distressed in any way

Confidentiality

Rafic Hariri High School is well aware that all matters relating to child protection and safeguarding are confidential.

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

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

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

Managing Allegations

The reception of any allegation must always be taken seriously and investigated before any actions or decisions are taken. There are no legal or organizational

ramifications for allegations investigated and identified as “false”, rather, it is the ethical duty for all those that observe or doubt a case of abuse to report it. In this section, the pathway for possible responses to the detection of abuse, differentiated by the different source of harm, will be outlined.

a. Student-Student

Rafic Hariri High School ensures that all students are informed of the school's behavioral expectations, internal protocols, and the safeguarding procedures that protect their rights and wellbeing. Students are regularly reminded of appropriate behavior and the importance of contributing to a respectful and safe learning environment.

In accordance with school protocols, incidents of student misconduct occurring on school premises must be reported to the Head of division. The Head of division is responsible for assessing the situation and reporting it either to the Principal or the Child Protection Officer (CPO), depending on the nature of the case and in accordance with the Child Protection Policy (CPP).

Bullying (whether verbal, physical, or social, etc.) is recognized as a serious violation of student wellbeing and will be addressed promptly and in line with the school's Internal Bullying and Cyberbullying Policy. Any bullying incident occurring within the school will follow internal disciplinary and procedures.

Cyberbullying incidents must be reported directly to the CPO. In situations where a student is at imminent risk of harm due to cyberbullying, such as threats, blackmail, or repeated digital harassment, reporting is mandatory. In such cases, the CPO must be informed within 24 hours, or by the end of the same school day, and must immediately consult with a specialized child protection organization to ensure appropriate intervention and support.

Additionally, any serious misconduct between students that put one or more students at imminent risk, such as sexual harassment, rape, sexting, or any other form of sexual violence, must be reported without delay. These cases must be escalated to the CPO within a maximum of 24 hours to initiate a timely and appropriate response, including referrals to external protection actors as necessary.

These protocols aim to ensure that all students are protected from harm, that risks are addressed promptly, and that the school remains a safe environment for all.

b. Student – Staff

When an allegation is raised against a staff member, the CPO is to be informed, who in turn will proceed to promptly inform the principal, who will investigate the evidence available in order to determine the best response. The CPO will no longer be involved in the case or the investigation, and will be only informed of the outcome. During an investigation of a staff member, the school administration will protect the privacy of staff until circumstances are clarified and a formal decision is taken.

Minor infringements, particularly those occurring for the first time, will not necessarily require judicial measures. However, if the nature of the incident, its context, or its impact raises concern, the decision to escalate the matter may be made by the principal or designated professionals. This determination will be made in coordination with the Child Protection Officer (CPO), based on a thorough assessment, interpretation, and analysis of the incident. The final decision will always prioritize the best interest of the student and align with the principles of the Child Protection Policy (CPP).

In such cases, the appropriate course of action will be determined in accordance with the school's internal regulations and in close coordination or consultation with a specialized child protection agency.

The response may include, but is not limited to, the following measures:

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

P.S: In cases where a staff member is suspected of misconduct, it is essential to uphold strict confidentiality throughout the investigation process. No information related to the incident or the student(s) or the identity of the staff member involved should be disclosed until the investigation is concluded. However, in line with safeguarding and security protocols, and to prioritize the protection and wellbeing of students, the staff member in question must be

immediately suspended from any direct or indirect contact with students. This precautionary measure shall remain in effect until the investigation is completed and a final decision is made.

The principal will be obligated to discuss the incident with the parents of the child subjected to abuse upon the resolution of the internal investigation that should be concluded promptly.

When a child is subjected to significant harm by a staff member, the principal, the designated professionals, or the Child Protection Officer (CPO) have a legal obligation to report the incident to the judicial authority, in accordance with the Lebanese Law 422/2002 (refer to Appendix 9 of the CPP). In addition to fulfilling this legal duty, the CPO or other relevant individuals may also choose to consult with or report the case to himaya, either for technical guidance or to ensure appropriate external follow-up and support.

c. Student – Parents

When a parent or caregiver is suspected to be the source of harm to a student, the Child Protection Officer (CPO) will, when necessary, meet with the relevant staff member who reported the concern and, when appropriate and feasible, consult with the student to assess the level of risk and determine the most appropriate course of action.

If the situation is assessed as a **potential risk**, the CPO may consult a specialized child protection organization to identify the safest and most effective response. Based on this consultation and in alignment with the child's best interest, possible interventions may include: individual counseling for the student, parental guidance or awareness sessions, and psychosocial support services for the student and/or the parents. These services may be delivered in partnership with external organizations and require informed consent from both the parent(s) and the child, when appropriate.

However, if the child is determined to be at **imminent** risk of harm (as defined in **Appendix 2**), the school is legally obligated to report the case to the judicial authority, in accordance with national protection laws and the school's referral procedures outlined in **Appendix 1**.

In situations involving caregiver-related concerns or family conflict, Rafic Hariri High School's primary responsibility is to ensure the best interest of the child by referring the case to a specialized child protection organization for appropriate follow-up.

At all times, the principal and the CPO are responsible for ensuring that the principles of confidentiality, do no harm, and the best interest of the child are strictly upheld throughout the decision-making and intervention process.

Signature of Principal

Date

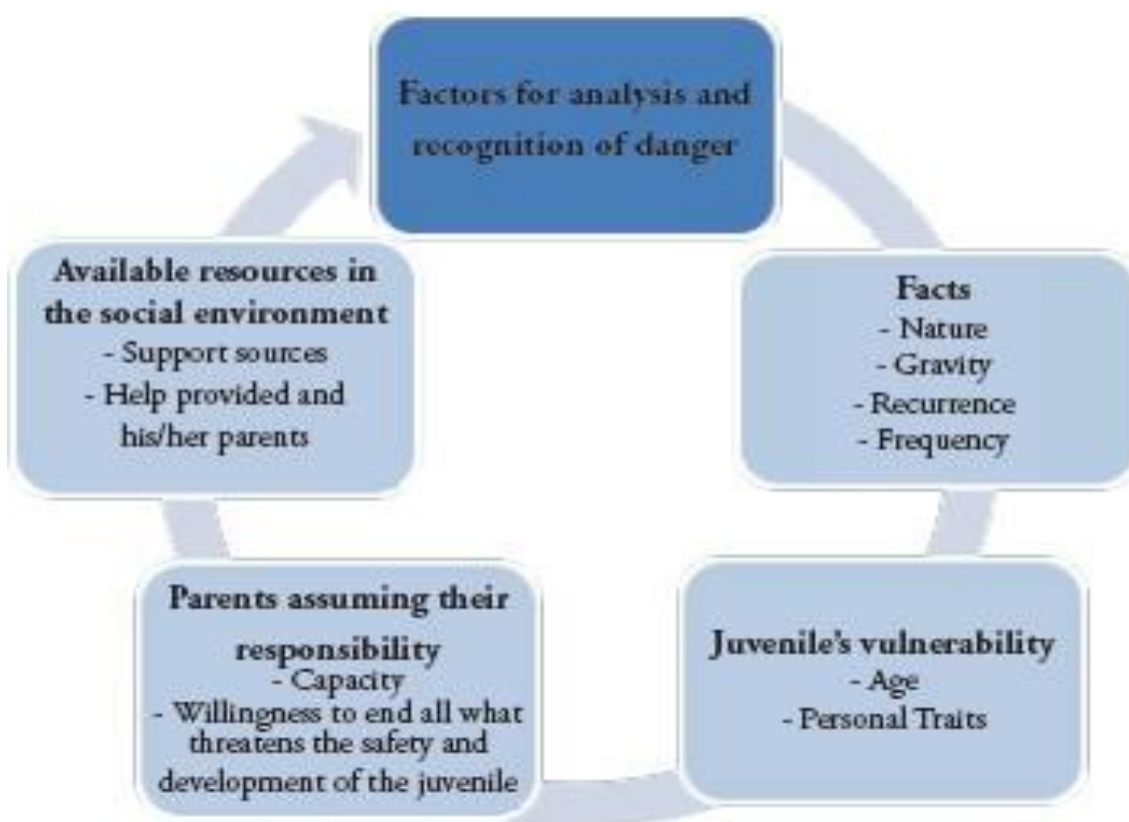
APPENDICES

Appendix 1: Defining Imminent and Potential Risk

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 (figure 1):

- The nature, gravity 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

Figure 1 - Main factors in risk analysis



The above figure shows the factors that a mandated social worker and Juvenile court investigates when a report is made.

To simplify the process for the school setting, the DCPO should focus on collecting information on the following factors for adequate assessment:

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

The CPO will have further information on the definitions of these factors in the following Appendices for accurate assessment.

Indicators to identify the level of risk:

The following table will provide a non-exhaustive list of situations and signs that may indicate different types of abuse and their risks. For example, violent conduct is a form of physical abuse that may have limited effects if it is non- recurrent. The same conduct can have serious consequences and require immediate intervention when a child is exposed to recurrent and severe violence over a prolonged period of time.

It is important to note that minor incidents and those considered to pose potential risk should not be undermined as they may lead to greater threat.

Type of Abuse	Behavior/Observed in school	Reported from home
Physical	- Violent conduct - Coercion by peers - Physical harm e.g. bruises, wounds, burns, fractures or swelling	- Coercion by family member - Corporal punishment - Physical harm e.g. bruises, wounds, burns, fractures or swelling
Psychological	- Intimidation - Bullying - Suicidal thoughts, self-harm or suspicious scars	- Belittling, insulting or humiliation - Rejection, defamation, isolation or being dominated - Domestic violence and disputes at home
Neglect	- Lacking basic care (shelter, food, water, clothing, sanitation, education or healthcare)	- Caregivers are emotionally distant - Child left alone to take care of themselves - Child is in danger or potential danger in their living conditions
Sexual	- Exposed to or witnesses sexual content - Inappropriate images taken by adult - Sexual behaviors with peers - Sexual exploitation - Rape or forced sex	

Appendix 2: Required Recruitment Checks

Child protection requires additional recruitment procedures:

- Make sure HR personnel is fully briefed on the CPP.
- Background checks of the criminal record for the individual applying to any position within RHHS. Should a felon account or suspicion report show up in this background check, the related individual can no longer be considered for recruitment.
- Requiring at least two references (not a family member or in a close relationship with the individual) for the individual's application. These references need to be checked for validity (to make sure they are real, and the contact information is valid).
- Paying attention to long or sudden gaps in the individual's working history, and questioning the reason behind the gap.
- Mention in advertisements that RHHS abides by a Child Protection Policy e.g.
 - RHHS has a child protection policy in place
 - Candidates will be expected to comply with RHHS's child protection policy
- Successful candidates must accept and commit to the Child Protection Policy for working with children.
- If possible: Provide a copy or link to the CPP and give time to the applicant to ask questions on the CPP policy.

Appendix 3: Protection procedures when a volunteer or visitor is expected at school

Whenever a volunteer or visitor is expected to deliver services or conduct certain work on the school site, RHHS will request prior written notification from the organization the individual is associated with. Upon arrival of the individual, RHHS 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 exposure to students within the school setting, they are required to be briefed. If the visit is short-term, a member of 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 of the school as per protocol. When appropriate, visitors should be given restricted access to only specific areas of the school.

Appendix 4: Preferred CPO characteristics

It is advisable for the CPO to be recruited based on certain characteristics that would help fulfil 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 staff member for accessibility whenever needed.
- Be a trusted member of the 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 social worker, since either occupation helps an individual handle expected cases in terms of skill set and professional training.

CPO Toolkit

Appendix 5: Contact information of relevant organizations

Reporting:

- Ministry of Social Affairs (MoSA) 01-429384
- Union for the protection of the juveniles in Lebanon (UPEL) 03-784265
- Himaya- Saida office: 76/450753
- Himaya Hotline 03-414964

Training / Policy development:

- himaya (Capacity Building Research and Development) 71-702316

Appendix 6: Risk Assessment

Below are the main factors that will help the CPO assess the case and determine whether or not there is imminent risk to the child or potential risk. The CPO should contact a child protection organization whenever they are uncertain of the outcome.

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 of harm 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 7: 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:

- 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).**

Appendix 8: Confidentiality and Data Protection

Confidentiality:

- The information collected from the child belongs to them therefore it should only be shared with the consent of the child.
- Only when deemed necessary should information be shared against the will of the child (e.g. High-risk cases that require CP organizations intervention) but the reason for why should be explained to them nonetheless.
- Children should be given the opportunity to highlight information that they do not want disclosed to particular people.
- A child has the right to view any information written about them at any time.
- Information should only be passed to the person that is meant to receive this information.
- **Need-to-know:** the limiting of 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:

- 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.
- 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 anti-virus should be on the computer.
- All records should be saved in a single folder that is not obvious to find on the desktop.
- 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 defer 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 (Click 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 9: Information for the Nurse

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

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)**

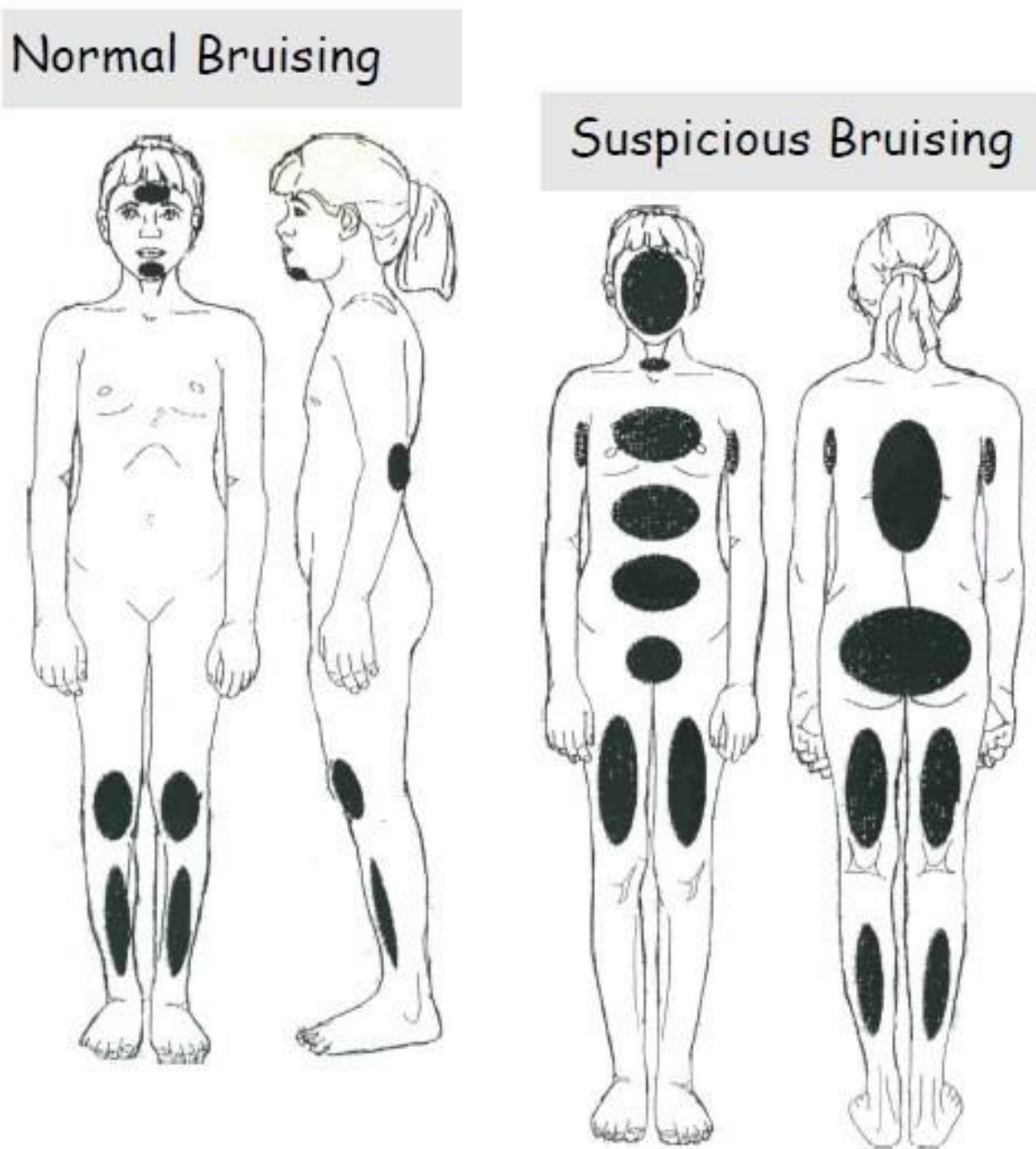
Clinical presentations:

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 behavior 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:



Building trust: Child-friendly communication

When interacting with a child that you suspect to be abused follow the guidelines mentioned in the 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 10: General 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.

a. Internal Investigations

An internal investigation may be required when credible information indicates significant wrongdoing, misconduct or ethical lapses towards a child or children in school. An investigation in a school is typically done when there are allegations that a 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.

b. 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 child subjected to harm 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 it is the immediate responsibility of the school to report to the appropriate national or governmental agency; the school will not conduct or continue an investigation (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...)

c. Internal investigation committee:

An investigation committee should convene to explore allegations against staff members when 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.

Responsibilities:

The person(s) conducting the investigation should:

- 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.

d. Investigation Process

1. Preparation:

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

2. Gathering evidence:

The investigator(s) 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 investigation. 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 nature and severity of the accusation should be used to clearly justify a preventive action by the school.

3. Conducting interviews:

The investigator(s) will meet with concerned individuals including: the reporter, the subject of investigation, the child subjected to harm, the child's parents (when applicable) and any relevant witnesses. Investigators 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 discussions are all 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 incident that resulted in harm to their child, when the student is needed for an interview, the investigation process and its result
- A social worker or psychologist or counselor should be present for support during interviews with children; the professional should 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, investigators 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 evidence is evaluated. Consideration needs to be given to:

- The integrity of the evidence 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 investigator(s) 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 school in case of any legal escalation. The written report should include sections on the:

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

6. Determining next steps:

Based on the findings, the final report, the investigation committee should determine an appropriate response to the allegation. If the principal 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 investigation should be kept confidential starting with when the report is received. Confidentiality means that participants should not speak about the investigation to other staff, including other witnesses involved in the matter. The fact that an investigation is underway, its subject, the processes followed, the materials gathered and, especially, the results of the investigation 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 must be retained, in a secure place, by the school together with a written record of the outcome of the investigation and, where disciplinary action has been taken, retained on the member of staff's, or student's, personal and confidential file in accordance with the school's disciplinary procedures. Anything documented must be stored

securely in a password-protected folder on a password-protected computer. Anything printed must 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, investigators 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

➤ **Suspending the subject of investigations**

The principal in consultation 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 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 investigation.

➤ **False allegations**

While false allegations by a 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:

- i. **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 principal, in coordination with the CPO, should consider whether or not it is appropriate to implement the school's disciplinary procedure against the student.
- ii. **Staff:** If after the investigation it is determined that a staff member has made a malicious false allegation against another staff member, then the principal should also consider how the school's disciplinary procedure can appropriately respond to the staff member.

➤ **Communicating with parents**

The parents of a student who has been involved in an allegation should be made aware of the allegation as soon as possible. The principal, with the 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 be 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 a school 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.

References

- ✓ ACAS (Advisory, Conciliation and Arbitration Service). *Guidance: Conducting Workplace investigations*.
http://www.acas.org.uk/media/pdf/q/0/Conducting_Workplace_Investigations_Nov.pdf
- ✓ BC Human Rights Coalition. *Conducting Internal Investigations*.
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- ✓ Corporate Compliance. *Guide to Conducting Workplace Investigations*.
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- ✓ ICMEC (International Center for Missing & Exploited Children). *Incident Response*.
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- ✓ Royal Commission into Institutional Responses to Child Sexual Abuse. *Catholic Education Diocese of Cairns Employee misconduct and investigation processes*.
<https://www.childabuseroyalcommission.gov.au/sites/default/files/CTJH.180.90001.0083.pdf>

Investigation tool templates:

- ✓ ACAS (Advisory, Conciliation and Arbitration Service). *Carrying out investigations in the workplace*. <http://www.acas.org.uk/index.aspx?articleid=5507>

Appendix 11: Disciplinary Procedures

Abuse of any kind toward a RHHS student will not be tolerated.

A staff member believed to be responsible for any form of abuse will be subject to disciplinary inquiry, possible legal action and /or termination.

All incidents of abuse must be reported immediately. Any reported case of abuse will be taken seriously. It will be promptly investigated, handled as confidentially as possible and appropriate measures shall be taken.

Disciplinary Procedures

When RHHS Learning Community believes that a staff member has committed any kind of abuse, the staff member will face a disciplinary action and possible legal actions according to the Lebanese Law.

In cases of abuse allegations against a staff member, RHHS has the right to impose any of the following disciplinary actions against him/her, depending on the severity of the allegation:

- a. Deduction of salary for a time interval not exceeding 10 days per academic year
- b. Delay in pay scale progression for a maximum of 2 years
- c. Suspension from work with pay
- d. Suspension from work without pay
- e. Dismissal from work without any material compensation.
- f. Immediate termination of contract
- g. Other judicial measures (reporting to concerned Judicial authorities)

In case of any allegations, RHHS also has the option to suspend the staff member while the investigation committee makes an inquiry into the allegations.

Any disciplinary action determined by RHHS shall be consistent with the provisions of the Lebanese Law.