



Evaluation Study of Child Protection Units





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World Vision

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Study Report

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ACRONYMS / TERMS USED

CPU	-	Child Protection Unit
CPW	-	Child Protection Worker
CRU	-	Child Rights Unit
Protocol	-	<i>Working Protocol for Child Protection Workers</i> , developed by the Ministry of Labour, Social Affairs and Equal Opportunities, Terre des Hommes & UNICEF (2010)
SA	-	Social Administrator
SSS	-	State Social Services
State Agency / State Agency for Children	-	State Agency for the Protection of Children's Rights

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EXECUTIVE SUMMARY

Having worked in Albania since 1999, and through child protection programming activities which have supported the establishment and development of Child Protection Units (CPUs) since 2008, in 2012 World Vision decided to commission a study to bring together the views and experiences of those most closely associated with the CPUs. This was carried out at this time partly to assist World Vision with their programming cycle, but also to contribute to the efforts to further develop and extend the CPU model throughout the country - in line with the current strategy for Albania.

The CPU Model, first introduced by UNICEF, has been identified in previous assessments (in 2009) as a viable model for the protection of children, and as an important element in the development of a national child protection system.

The situation in Albania is rather unique in that instead of the CPUs being the responsibility of one particular ministry or department, they are under the direction and control of the individual mayors / heads of communes where they are located. While the Law on Protecting Children (2010) states that CPUs are to be established in each municipality and commune, there appears to be no absolute duty to do so. Additionally there is no financial provision for the establishment and running of CPUs, with each municipality / commune expected to identify the appropriate budget for the service. The main consequence of these features is that there is no universal service across Albania and the CPUs can be vulnerable to changes in local priorities.

Although standards and procedures have been developed, chiefly contained in the *Working Protocol for Child Protection Workers*¹, these are not mandatory. This means that there is a great deal of variance between CPUs². This is compounded by a lack of inspection and monitoring.

Despite these limitations, all those involved in the study were strongly of the opinion that CPUs had made a contribution to the increased protection of children. This was considered to be most strongly associated with the creation of the space and a forum to discuss child protection and child wellbeing, together with the development of networks / multi-disciplinary teams to comprehensively address cases of child abuse. However, there remain considerable barriers to the effective support for children at risk because of a lack of specialist services, such as psychological intervention and appropriate alternative care, plus comprehensive social protection schemes for the most vulnerable children.

The emphasis is now on spreading the CPU model throughout Albania. Support for the establishment and development of CPUs has been largely provided by NGOs and UNICEF but with the economic crisis coupled with the withdrawal of donors from Albania associated

1. The Protocol itself does not contain standards, but instead lays out expected procedures and guidelines

2. Although some multi-stakeholder programmes such as MARIO have conducted shared trainings to reduced divergence and increase consistency. However not all CPUs have been involved in all trainings

with EU accession, the urgent need is to develop structures and mechanisms to ensure the sustainability (and quality) of the CPUs.

An emphasis has been placed upon the role of the State Agency for Children in leading the roll out and implementation of the CPUs. However, the State Agency itself is relatively recently established and has a wide range of competing priorities. Unknown as yet is the impact of the on-going reform of Social Services. To date this reform and the development of the CPU model appear to be two parallel processes. The close collaboration and coordination between the CPUs and Social Services - especially in terms of planning at regional level - is critical to the planning and rationalisation / maximisation of resources and services.

BACKGROUND & CONTEXT OF THE STUDY

PURPOSE OF THE STUDY

World Vision has been supporting CPUs in Albania since 2008 through a mixture of financial and resources support, and capacity building³. A significant emphasis has also been placed on advocating for the empowerment and expansion of the child protection system, including CPUs, and reform of services for children and families. This has been carried out in conjunction with other significant partners such as UNICEF, Save the Children, Terre des hommes in Albania and the BKTF Coalition⁴.

As part of the regular programme evaluation and planning process, World Vision decided to commission a study to consider the effectiveness and practice of the CPUs. The time was judged right to do this due to an increased emphasis being placed on the role of CPUs in protecting children. This importance has been reflected in the role of CPUs being mandated under the law (Law Number 10347, 4 November 2010, concerning ‘The Protection of the Rights of the Child’⁵).

However, more than just being used for internal planning and programming purposes, World Vision wanted to carry out a study that would be of wider use and interest to stakeholders and actors in Albania who are concerned with the development and implementation of the CPU model specifically, and the child protection system more generally⁶. This was considered to be especially important as the new laws and strategies concerning children’s issues have created considerable momentum and focus on the role of the CPU, and the number of CPUs within the country is planned to increase dramatically within the near future⁷.

The timing for such a study also seemed particularly appropriate as while several studies into the CPUs have been conducted these have tended to focus on specific issues (for example trafficking). The last, most comprehensive, evaluation of the functioning of the CPUs was in 2009⁸, and it was conjunctured that since this last review, considerable changes and development have occurred with regards to the practice and operation of the CPUs, experience of implementing the model and the context of the work.

3. In particular in Shkodra Municipality, Lezha ADP and Kurbin ADP and Elbasan CPUs, although World Vision has also been promoting the establishment of CPUs in other areas they work

4. The BKTF Coalition is a network of organisations working in Albania – including both national and international organisations. Although originally concerned solely with the trafficking in children, the Coalition has now extended its remit to address child protection generally

5. In addition, a number of sublegal acts have been passed (also referred to as DCMs) which give guidance and operationalize the provisions contained in the law.

6. In addition to World Vision, a number of other international and national organisations are currently supporting CPUs, including UNICEF, Partners for Children, Save the Children and Terre des hommes. A number of other CPUs have also been established independently, and without the support of a children’s organisation by municipalities and communes.

7. Note, as at July 2012 there were over 50 CPUs established and it is expected that around 100 CPUs will be set up by the end of the year according to the State Agency.

8. Westwater G & Jovanovi V (2009) *Evaluation of the intervention of Child Protection Units within the framework of the social protection system reform and social services decentralization in Albania*; UNICEF, Albania

In establishing the scope of the study, four broad areas for enquiry were identified:

1. Service quality of the CPUs', based on the roles and responsibilities of CPUs defined in Republic of Albania Ministry of Labour, Social Affairs and Equal Opportunities, Terre des hommes & UNICEF (2010) *Working Protocol for Child Protection Workers* (ie 'the Protocol');
2. The effect of CPU's service on service users (children and families) based on performance defined in the Protocol;
3. Challenges for Local and National Governments in strengthening and establishing CPUs;
4. Recommendations for up scaling of the CPU model

It was agreed from the outset that, given the resources and time available, it would not be feasible to carry out a comprehensive assessment of every CPU. Instead it was decided that what would be most useful would be a scoping exercise bringing together the widest range of opinions - especially from those immediately and directly associated with the operation of the CPUs. To this extent it was not expected that the study might come up with any particular new or novel findings, but more that it would document the experiences and views of those who know the model.

This kind of feedback is critical as it directly relates to the issue of sustainability and the quality of services. Particularly in the context of the emphasis on the development of CPUs within the legal and policy framework of Albania, it is especially important that the expansion of the CPUs is grounded in reality.

The study did not seek to determine whether the CPU model is appropriate for the Albanian context. This was partly as the previous assessment in 2009 had already determined that the CPU model was a 'functional model' and had the potential to be an effective child protection mechanism for Albania⁹. It was also a pragmatic decision as substantial investment and related policy and legislative reforms have been put in place to support the CPU model, and this is clearly the direction in which child protection within Albania is intended to move.

9. *Ibid*

METHODOLOGY & RESEARCH PERIOD

The study was carried out by Stephanie Delaney (Independent Child Protection Consultant) in conjunction with the staff of World Vision.

There were three broad phases to collecting information:

1. **Literature review** - including policy and legislative documents and reports of assessments, evaluations and studies completed to date. A list of documents reviewed is included Appendix A.
2. **Field data collection** - mainly qualitative data collected, using a variety of standardised tools. The field work was completed during the period of the two weeks in July 2012.
3. **Questionnaire** - circulated to CPWs to gather statistical data, regarding the number and types of cases.

• Field Data Collection

Field work associated with the study was carried out from 3rd July - 12th July 2012.

Given the limited time available for fieldwork and the scope of the study, it was decided to select four study sites. The selection criteria for the four CPUs studied was based upon trying to capture as wide a spread of experience and environment as possible - hence it was determined that the CPUs visited should include at least one urban (municipality) and one rural (commune); plus at least one CPU that had been established in the last 12 months and one CPU that had been established for at least 12 months (ideally longer). As part of the study the CPWs were interviewed and a selection of their files / cases reviewed.

Key respondent interviews were carried out with national partners (including INGOs, BKTF, UNICEF and the State Agency for Children) and interviews / focus group discussions with regional and local partners (including State Social Services, Education and Health Departments and local NGOs). At least two interviews with partners took place in each of the four areas studied. While the inclusion of partners was partly dependant on availability, care was taken to ensure that a range of partners were interviewed across the whole study process.

At national level, a focus group discussion / feedback workshop was conducted with representatives from INGO partners with specific responsibilities and experience of working with and directly supporting the CPUs.

Two focus group discussions were held with children, together with a focus group discussion with parents who had been in contact with a CPU.

In order to promote openness and transparency, the participants were told that their inputs into the study report would be kept confidential and anonymous. Interviews took place mainly in Albanian (with translation by Dea Haxhi from World Vision, who has no direct line management responsibility for any workers) and in a few cases in English (where again Dea Haxhi was present to give consistency across all interviews).

To ensure that there was standardisation across the interviews and focus groups, a set of tools were established in order to guide discussions. A copy of the tools can be found in Appendix B.

LIMITATIONS OF THE STUDY

There are a number of limitations to the study, which should be considered when reviewing the report - however these are probably of low significance in terms of the findings from the study given its objectives and purpose, especially since steps were put in place to try and limit any impact. The two main limitations were:

- Only four CPUs visited - it is possible that visiting more CPUs would have given a greater range of experiences and feedback, however, in selecting the CPUs securing differences in location and context were considered. Considering a smaller number of CPUs also meant that there was time for in-depth discussion.
- Limited time for field visits, combined with the summer period - meant that it was difficult to always ensure the participation of stakeholders. Again, seeking input from various actors in different locations meant that a range of experiences and views was obtained even if all stakeholders were not consulted in every location.

It should be noted that a deliberate strategy was not to focus on a 'pure' piece of research in relation to the methodology. Rather it was decided that, in order for the study to be 'helpful' the tools would be used as a guide, but that the consultant could adapt these *ad hoc* in order to capture information that would be relevant to the study.

Finally since the consultant selected to carry out the study has been working in Albania for over two years (although not with World Vision), in part supporting the development of the CPUs, the study cannot be considered objective and completely impartial. However, it was felt that the additional knowledge and experience of the Albanian situation would offset any subjectivity.

FINALISATION OF THE STUDY REPORT

Following the data collection in country a draft report, was written by the consultant and World Vision during August 2012. The report was originally written in English and then translated into Albanian.

The draft report was then shared with stakeholders and partners during August and early September, and a period of consultation given for feedback. The feedback received is reflected in this, the final report.

However, World Vision welcomes additional comments and feedback on the report, which should be directed to Dea Haxhi (dea_haxhi@wvi.org) and Ridiona Stana (ridiona_stana@wvi.org)

CPUS AND THE CONTEXT OF ALBANIA

Since the first unit opened several years ago, the CPU has become a key element of child protection within Albania. The establishment and operation of CPUs do not, by themselves, constitute a national system of child protection (which encompasses the efforts of all sectors, framed within clear legislative and policy guidelines and with well capacitated staff and resources working in synergy to protect children and promote their welfare) but are an important step in the development of a more comprehensive approach to protection.

This move towards a more systematic approach towards child protection is line with global trends. Over the past five years, an emphasis has been placed internationally on the development of national systems of child protection. This has resulted in a deviation away from more traditional, thematic child protection programming, partly because it has been recognised that thematic interventions lacked sustainability and also did not address the situation of all children at risk of abuse¹⁰&¹¹:

'.....the systems approach differs from earlier child protection efforts, which have traditionally focused on single issues such as child trafficking, street children, child labor, emergencies, institutionalization, or HIV/AIDS. Although such efforts have produced substantial benefits, this diffused approach often results in a fragmented child protection response, marked by numerous inefficiencies and pockets of unmet need'

(Wulczyn et al, 2010, page 1)

While the growing interest in applying a systems building approach to child protection has been steadily increasing within the international community, with numerous policy papers being produced¹², the debate continues regarding the conceptualisation of what constitutes a child protection system and there is some divergence of opinion among actors / stakeholders¹³. Despite these variances, a number of key features are emerging as being essential to the systems building approach. These include:

- A **continuum of care and intervention**, ranging from preventative / proactive services through to reactive / response services.
- **Synergy, and close collaboration and multi-agency working**, between the various

10. Note, for the purposes of this report 'abuse' should be considered in its widest form, and should read as referring to any act or omission which has, or is likely to cause, harm to a child to the extent that their development and wellbeing will be affected. This includes, but is not limited to physical abuse, emotional and psychological abuse, sexual abuse, violence, neglect, exploitation and trafficking

11. For a more detailed discussion of the development in thinking and application of a systems approach to child protection see Wulczyn F, Daro D, Fluke J, Feldman S, Glodek C & Lifanda K (2010) *Adapting a Systems Approach to Child Protection: Key Concepts and Considerations – Working Paper*; US, New York, UNICEF

12. For example by UNICEF, World Vision, Save the Children, Tdh Child Relief and a number of other agencies

13. Supplementary information – from consultant's own knowledge

children services (eg protection services and alternative care provision) and other actors and sectors with a responsibility for protecting children / promoting their welfare (such as police, education and health, and including the other mechanisms and processes established such as anti-trafficking and domestic violence).

- A move away from programming which targets ‘categories’ of children towards considering the needs of **children at risk / experiencing all forms of abuse**.
- **Addressing needs holistically**, rather than in a purely symptomatic way.
- A **well capacized and resourced** workforce, with a range of service provisions.

The use of Child Protection Units, through their work with individual families at risk and by adopting a multi-disciplinary approach to case management and intervention, is one of the ways in which a child protection system¹⁴ can be developed and implemented at a national level¹⁵. As such, the development of CPUs in Albania is an important contribution to the child protection system.

The operating context in Albania has features regarding the organisation of services which have a direct effect on the way in which the CPUs function.

Unlike in many countries, where CPUs are managed from either central or regional level (for example via Social Services), in Albania each CPU is the responsibility of the mayor / head of commune in which it operates, who is also responsible for the recruitment of staff and the funding of the unit.

This means that, in effect, it is possible for each CPU to choose how to operate, although the *Working Protocol for Child Protection Workers*, developed by the Ministry of Labour, Social Affairs and Equal Opportunities, Terre des hommes and UNICEF in 2010 (ie ‘the Protocol’) does give guidance. The management of CPUs at individual commune level also means that CPUs can be isolated. A lack of a formal coordinating agency - either a regional or central level (although the State Agency has recently assumed this role) means that collaboration between CPUs is as a result of individual goodwill and responsiveness rather than a structural requirement.

The Protocol is not mandatory, although it is recognised that in terms of ensuring consistency and minimum standards some way of setting expected service levels and practice is needed. Similarly, at present, there is no inspection of CPUs. Both of these issues have been identified by national actors, including the State Agency for Children and UNICEF as needing attention and discussions are on-going as to the best ways to address these gaps.

There are also gaps regarding standards for other aspects associated with the CPU - for example while the legal framework for CPUs states that the CPU should be staffed by a ‘social worker’, the absence of a definition of what constitutes a social worker (in terms of experience / skills / qualifications) means that this is not always the case¹⁶. Other gaps relate to standardisation of data collection and information recording, supervision levels, caseloads, minimum staffing levels and opening hours.

14. Note, since the child protection system in Albania, albeit in the relatively early stages of development, seeks to address not only child protection issues but wider issues relating to child wellbeing, including social protection, it could perhaps be more accurately described as a *Child and Family Welfare System*. For consistency however and to avoid confusion, throughout this paper, the term ‘Child Protection System’ is used

15. For further information on the systems approach, and an exploration of different typologies of systems see Cameron G, Cody N & Adams GR (eds) (2007) *Moving Towards Positive Systems of Child & Family Welfare – Current Issues & Future Directions*; Canada, Ontario, Wilfrid Laurier University Press

16. The Protocol also gives guidance as to the skills and qualities needed by CPWs, but this is not currently a mandatory requirement

The State Agency is itself in a relatively early stage of development - having been established in the last couple of years - and as such the roles and responsibilities of the agency are still being embedded and to some extent finalised in terms of operationalization. The State Agency has a number of issues to address, and this means that they have to prioritise their actions.

State Social Services is currently undergoing a review. The effects of this review will no doubt impact on the operation of the CPUs although how / what this might be is not yet finalised. This reform is likely to be of critical importance to the CPUs in relation to services for children - specifically how the review effects the planning and rationalisation of resources, and operational guidelines (for example in relation to the placement of children in institutions and foster care, and the provision of specialist services).

FINDINGS & OBSERVATIONS FROM THE STUDY

One of the most significant, and interesting findings from the study was the high degree of congruence between respondents. Almost all those participating in the study cited similar issues in terms of the challenges and successes of the CPUs and of the issues that need addressing in order to ensure the sustainability and successful up scaling of the model across Albania. There were no contradictory views.

CONTRIBUTION TO CHILD PROTECTION & THE DEVELOPMENT OF THE NATIONAL CHILD PROTECTION SYSTEM

As mentioned earlier, the most comprehensive review of the CPUs to date, carried out behalf of UNICEF and the Austrian Development Cooperation in 2009, concluded that, despite challenges, the CPU was a 'functional model' for child protection in Albania (Westwater *et al*, 2009). It was determined that the CPUs showed measurable results and that there were positive impacts from the interventions of the CPUs on both the welfare of children and families as well as on the coordination of the work of the protection network at local level.

This view was endorsed by stakeholders who participated in the study who all felt that the CPUs had contributed to the increased protection of children, even if they were not always able to articulate *why* they felt that this was the case. Indeed, when national stakeholders (from international agencies, INGOs and government) were asked to rate, on a scale of 1 - 10 their perceived change in the protection of children, the average improvement was ranked at 3 ½ - 4 points¹⁷.

One of the most significant achievements of the CPU was considered to be the creation of the space to talk about children and child protection, resulting in a sense of putting child protection issues in focus in a way that had not previously existed. Linked to this, another significant success was identified as being the creation of multi-agency working and a shared sense of responsibility. This was captured by one focus group of partners who agreed that before the establishment of the multi-agency network, they had '*found reasons not to take action*' but that now, working as a team, they felt supported and held each other to account.

Notwithstanding these significant achievements, there was a sense that although parts of the child protection system existed (in principle the CPUs), the system itself was not fully developed and in place. The view expressed by participants in the study that there is not a functioning child

17. Interestingly, perhaps surprisingly, in the focus group with 20 parents, they felt that the change was 10 points!

protection system reflects the *Situation Analysis on Child Protection System in Albania* conducted in 2011 on behalf of the BKTF Coalition (Danaj, 2011), which, in considering the functioning of the CPUs specifically in relation to trafficked and exploited children, concluded that there was no child protection system in place, although portions of the system existed.

Relating to the child protection system, it was suggested that a more comprehensive vision for children needs to be developed, which encompasses the roles and responsibilities of other actors and sets out strategies for prevention initiatives and service developments, together with harmonising child protection procedures more closely with other initiatives, such as domestic violence and trafficking where there was considered to be considerable duplication and overlap.

While it was acknowledged that contained within the framework of the 2010 Law on protecting children and the National Strategy for Children there is a stronger articulation of the protection of children, there was a sense that the focus was still on supporting different groups of children, rather than an overall vision for promoting the wellbeing of *all* children.

The Albanian National Child Strategy 2005 - 2010 projected the implementation of a comprehensive and profound reform of the social protection system, aimed at identifying ways to reduce poverty and establish a quality system of social services for people in need, especially children. However, this is yet to be accomplished¹⁸. Since the strategy articulates issues in terms of discrete categories of children rather than the needs of children at risk of abuse generally it is unclear what effect this may have on the protection of children. The new, latest, Strategy for Children, the final version of which remains to be formally published, also defines child protection as an important strategic priority and calls on protection actors collaboration for identified categories of children at risk, again rather than for the entire population of children.

It was noted that the current social services review being undertaken seems to be a parallel process to the development of the CPUs and the establishment of the role for the State Agency, and that these two processes should be aligned at operational level. This is especially with regards to the respective roles of the State Agency and State Social Services where there was a lack of clarity with participants in the study at all levels about respective mandates and responsibilities.

Significant Points Emerging from the Study:

- Widespread view that CPUs are contributing to the increased protection of children - in particular by creating the space to talk about children's issues
- Creation of environment of multi-agency working and shared responsibility for protection has taken place but is not implemented consistently, with the protection of children still seen as being the responsibility of the CPUs rather than all agencies
- Although CPUs are a critical element of the child protection system, as yet the 'whole' system does not exist. This is linked to a more comprehensive view needed of the ways of promoting the welfare of all children, and harmonising this with other strategies and sectors
- Review of social services and the strategy for the development of the State Agency and the CPUs should be closely aligned and coordinated with respective roles and responsibilities clearly define

¹⁸. Note the reform of social services is being spearheaded by UNICEF in conjunction with relevant ministries, and consultation is on-going

RESOURCES & SERVICE PROVISION

A considerable challenge for the CPUs, identified by all participants in the study, is the lack of resources - both financial and services available to refer families and children for support and assistance.

Although Article 39 of the 2010 Law does recognise and create a legitimate mandate for the CPUs at municipality / commune level, significantly the law does not provide that municipalities and communes *must* establish a CPU, nor are there any specific requirements or provisions regarding funding of the CPUs¹⁹. One effect of this is that there is no universal coverage across Albania for the protection of children²⁰.

The sub-legal acts associated with the 2010 Law²¹ state that in the absence of a CPU, referrals regarding protection become the responsibility of the Child Rights Unit²². While this appears to provide a solution, this does not take into account the very different skill set needed for engaging and working with families around risk, as distinct from monitoring of child rights situations. While the study did not assess the capacities of the CRUs to respond to child protection concerns it is not unreasonable to assume that they suffer from at least the same challenges as the CPUs in terms of constraints to effective working such as a lack of resources.

Budgets, or rather the lack of a specific budget allocation, were cited by all respondents as a major challenge to the effective working of the CPU and sustainability. Unfortunately the law is silent as to how the CPU should be funded. At present they are funded through the commune / municipality²³, but as was observed by several respondents, in many locations the priorities of the local government / council are more geared towards initiatives that benefit all of the community (such as new infrastructure) rather than protecting the most vulnerable²⁴.

It is worth mentioning that while in the main the costs for the CPUs are currently borne at individual municipality / commune level, the long term benefits of a proactive approach to child protection (such as reduced costs of alternative care, economic viability in adulthood and reduced crime and other social problems) are more directly seen at national level. This means

19. In fact the law provides that CPUs should be created in each municipality/commune as part of their administrative structure. Therefore municipalities/communes must understand that they have a legal obligation towards child protection and that this legal obligation of the local government should be accompanied with budget. Municipalities / communes need to ensure that their budget plans presented each year at the Ministry of Finance include CPU provisions

20. Since there is no one coordinating or regional body responsible for the CPUs (or currently no shared operational agreements between municipalities / communes) where municipalities / communes do not have a CPU there is no automatic arrangement for coverage nor is there a financial incentive to support other municipalities / communes CPU service

21. Note – at the time of writing the report the official translations of the sub-legal acts were not available. Efforts have been taken to ensure that correct understanding of the provisions of the acts has been obtained (through consultation) but there may be some variance with the final English translation

22. Child Rights Units are established in each of the regions. Their primary role is to monitor the situation of child rights in each region. The Child Rights Units are under the line management of the State Agency for Protection of Children's Rights (Ministry of Labour)

23. Sometimes with the support of NGOs and other funders such as UNICEF

24. In order to try and reduce the impact of this, some INGOs such as World Vision are encouraging the CPWs to advocate for more allocation of funds for the CPU when the budget planning in the commune or municipality takes place

that, while of course, individual municipalities and communes may be aware of their “moral” and legal duties to protect children, the financial benefits of doing so may be less obvious²⁵

It is difficult for CPWs to systematically and rigorously follow up cases and conduct home visits where there is no transport provision. Follow up of cases is critical in ensuring that the situation for children who remain at home is closely monitored. In some cases CPWs have been creative and have tried to work with NGOs and other services (such as the police) to share transport, but this is not always possible. There are also instances where CPWs have to pay for phone calls (using their own mobile phones) and in at least one situation where the head of commune has paid from their own personal finances for the rental of rooms for awareness raising activities with the community²⁶.

The lack of budgets also affects the way in which CPWs are able to support families. For example, CPUs tend to rely on NGOs to supply immediate relief (such as food parcels) to families in need, a situation which is not sustainable in the long run, especially as the move towards EU accession and the current global funding crisis means that many independent organisations are needing to re-evaluate their priorities and / or lose funding streams. In addition, not having a budget means that, rather than carrying out needs led assessments and then finding ways to meet those needs, interventions tend to be based upon services (and resources) available. This is not in line with either good practice, or the intentions of the Protocol which requires interventions to be based on need.

A lack of dedicated funding for CPUs also means that they are vulnerable to closure / diversion of activities when there are other priorities or when the focus of importance from within the commune / municipality changes (for example as a result of changes in the local situation or elections).

Even though the CPUs and CRUs are called ‘units’ in fact there is generally only one worker in the unit. This means that, in practice, if the worker is on holiday or off sick there is no - or at best little - coverage of the service. In some cases it appears that arrangements have been made for the Social Administrator or the Supervisor of the CPU to handle cases while the CPU is absent but these arrangements are *ad hoc* and are largely dependent upon the working relationships established, rather than because of the creation of an enabling environment. Even where such arrangements have been made, weekends and evenings are not covered which means that there is no 24 hour protection service provided from by CPUs²⁷. This is a significant gap in the protection of children, as even when police have the responsibility for protecting children (for example when a crime has been committed) they do not have the skills necessary to assess the needs of children.

In the study, when asked about constraints, CPWs cited a lack of specialist services, in particular psychological and support services, as a challenge. While many cases are referred to the CPU because of economic need, in cases of abuse or neglect there is a lack of services to support children and families. This includes, for example, the lack of emergency care / services outside Tirana (Westwater *et al*, 2009), and the lack in alternative care provisions and gaps in the law regarding the provision of care to children aged 15 - 18 years old (Universal Periodic Review,

25. Numerous studies have concluded that spending on proactive child protection can have considerable cost savings in the long term. For an interesting summary, see Aked J, Steuer N, Lawlor E & Spratt S (2009) *Backing the Future: Why Investing in Children is Good for Us All*; UK, London, Action for Children & NEF Economic Foundation

26. It should be noted that the State Agency, together with UNICEF, are involved in raising the awareness of Mayors / Heads of Commune and have already initiated an programme of introduction

27. Albania does have a helpline for children but this cannot be expected to be able to reach children in immediate need of protection, given geographical constraints

Albania, 2004 - March 2009). Other significant gaps reported included medical assistance, and services for children with disabilities. CPWs felt that in many cases all they could offer in terms of tangible support was an access to economic assistance.

It would seem sensible, in view of the challenges in relation to resources, that the review of social services currently being undertaken by the Ministry of Labour, with the assistance of UNICEF, becomes more closely aligned with the strategy for the roll out of the CPUs so that those resources that currently exist can be rationalised and made more effective. It would also seem necessary to ensure that either funding for services and the CPUs is allocated at central level, or there is a mandatory requirement for municipalities / communes to set aside / ring fence funds for the CPU in order to ensure that once established the CPUs can function appropriately.

Significant Points Emerging from the Study:

- Lack of resources - including services to refer families to and financial support of CPUs - considered a barrier to the effective provision of CPU service
- No 24 hour or country wide coverage means that child protection is not comprehensive
- The lack of standards, legal requirement and budgets for establishment and running costs means that CPUs are vulnerable to changes in priorities and focus - this can lead to a lack of sustainability and the loss of investment (for example capacity building efforts)

STAFF CAPACITIES

Although Article 30 of the 2010 Law requires that each CPU should have a least one social worker, the definition of what constitutes a social worker is absent²⁸. At present while there is guidance given in the Protocol regarding the skills and qualities required for a CPW, this document is not mandatory and the appointment of CPWs is left to the discretion of Mayors / Heads of Communes. This means that appointments may not always be based upon the selection of a candidate that is most suited to the role and responsibilities. Of course, in many areas, particularly rural and isolated communes, it may be difficult to identify a local person who has the necessary qualifications / experience. The lack of appropriately qualified human resources, especially out of Tirana, has been noted as a particular limitation of the CPU service by a number of commentators (for example Westwater *et al*, 2009 and Danaj 2011).

In an assessment of the capacity of CPWs to appropriately address child trafficking conducted by World Vision (Elmazi, 2011) using an online questionnaire²⁹ with 14 CPWs, it was identified that although the workers recognised and understood trafficking they were not aware of the national structures and procedures in place, despite the trafficking of children being cited as a form of abuse in the Protocol. Unfortunately the limitations of the assessment, being a small sample size and subjective reporting, meant that it was not possible to follow up and clarify responses. Therefore, it is not known whether this apparent confusion was because of a lack of knowledge on behalf of the CPWs, or because they considered there to be a lack of congruence between the Protocol and other policies.

Nevertheless from the results of other questions in the survey it would seem that even if the CPWs were not able to state policies, when asked for what their actions would be in relation to a specific case scenario, they were able to identify correctly the steps they should take to manage the case and support the child. One interpretation of this seeming contradiction might be that it tends to suggest that the capacity of the social workers, in at least some cases, may be underestimated and / or the measures that have been so far used to assess capacity have not focused on the practice of the work of the CPUs from a more objective perspective.

Having said this, because of the historical lack of mandatory standards for CPWs, the range of skills and qualifications for CPWs can vary. Anecdotally, it is known that this ranges across Albania from CPWs who have significant relevant experience, to those with little knowledge and skills. It is difficult to imagine that someone with little or no training / experience is able to assess and intervene in cases of abuse to the same degree of effectiveness as workers who are adequately trained. This is an issue for parity of service across the country. For example in the exercise given to the four CPWs as part of the study not all workers were able to accurately identify the child most at risk and there was variance between answers.

Similarly, while it would seem that some sort of evaluation / family assessment (ie the social

28. It is understood that UNICEF are currently leading an initiative to set standards for the designation of 'social worker'

29. Using 'Survey Monkey' online tool

report) is conducted and with reasonable timescales, it was evident from discussions with participants that there was a general lack of knowledge about either the processes identified within the Protocol (in relation to assessment, planning and review - what might broadly be understood as 'case management') or that where this existed there were gaps in knowledge (such as regarding timeframes). It was suggested that to some extent, because of operating difficulties, this may reflect aspects of the Protocol that were not relevant or workable in some areas and which were being worked around in order to find a more pragmatic way to operate. However, basic holistic needs assessments, based on the principles of good practice, planning and reviews should always be carried out regardless of the circumstances.

Attempts are underway to increase the capacities of CPWs by some INGOs, NGOs, and the State Agency for Children, UNICEF and the Ministry of Labour. CPWs have been offered training and capacity building (including in some cases mentoring), although this is patchy and appears to be largely reliant on the activities of interested stakeholders, including the level of commitment of the CPW, who also needs permission of their supervisor and / or the head of commune / mayor to attend. While it would be ideal to ensure that appropriate pre-service training is undertaken before appointment, as an interim measure a comprehensive package of *in-service* training has been developed by relevant stakeholders. This is especially important as the number of CPUs mushrooms, given the need to ensure consistency of approach and service levels.

The introduction of this training, as a mandatory requirement, together with required appointment criteria for workers would be a considerable step forward in increasing the capacity of staff. However, it should be recognised that developing a fully capacitated workforce is not a short term endeavour and that significant investment will be necessary over the long term. This also includes capacitating supervisory staff and managers/

Another strategy which would help increase / maintain the capacities of staff is the establishment of the role of CPW as a 'technical post', ring fenced and not changed when the mayor changes. Although in some areas when the mayor changes the CPW is not replaced, it has been noted (for example in the 2009 assessment) that this is not always the case. In practice this means that considerable investment in capacity building can be lost.

• **Supervision and Support**

Closely allied with the issue of staff capacities is the issue of supervision and support. This is not the same as management, but relates to the technical guidance given to workers so that they can effectively and safely manage cases. All workers learn not only from the training that they receive, but perhaps more from the opportunity for coaching and mentoring to develop their skills.

The need for supervision is highlighted in the Protocol, although is largely absent at present, as it depends on the individual arrangements in place in each municipality / commune.

Under the recently passed sub-legal acts, while the management of the CPUs remains the responsibility of the mayor / head of commune, there is also a line of reporting and monitoring delegated to the CRUs (and through them to the State Agency). It is too soon to see what effect this will have on the operation of the CPUs (for example if this will be merely in terms of statistical monitoring). The intention appears that the State Agency will monitor the implementation of the law to protect children and will intervene when the law is not being implemented to promote consistency across Albania it is likely that one agency will need to be

ultimately responsible for the implementation of the CPU service and the quality of this. This may fall to the State Agency and if so it may constrain their role in providing the framework and policy for child care. It is difficult to both create policy and guidance and retain a sense of independence and oversight and simultaneously to be responsible for implementation³⁰.

• **Monitoring & Evaluation**

In terms of monitoring and evaluation of the CPU service, because the CPUs are established under the administrative framework of the municipality / commune there is no current framework for the regular inspection and 'quality control' of the work of the CPUs and the monitoring of their activities³¹. This extends to inconsistent levels of support and supervision (Westwater *et al*, 2009), being dependant on the individuals concerned, rather than on a structured framework being in place.

It is understood that discussions about inspection of CPUs, in essence ensuring compliance with the Protocol, are on-going between the State Agency and other government departments. It is recognised that this is an area that needs to be addressed, but as yet it is not clear how this will be achieved.

Significant Points Emerging from the Study:

- Although guidance given in the law and Protocol regarding the skills and qualifications of a CPW worker, this is currently not mandatory. This means that the quality of service provided can be variable. Introduction of mandatory training and qualification is in progress and this should help improve standards generally
- Despite existence of Protocol there is no requirement to follow the processes and procedures identified. Therefore there is a lack of consistency across CPUs
- Training and capacity building is provided by a range of actors - but this is patchy as dependent upon priorities of agencies (and donors) providing training and the commitment of CPWs
- Ring fencing the post of CPW as a 'technical post' to ensure that it is not vulnerable to change of personnel as a result of changes in local leadership may help increase sustainability
- Case supervision and support from technically qualified and experienced supervisor depends upon the arrangements made by each commune / municipality rather than there being a standard framework
- Monitoring of CPUs now also responsibility of CRUs / State Agency - although it is too soon to assess implications of this and whether this will take the form of case supervision or statistical information. However, it is likely that CRUs will need substantial capacity building if they take on the role of providing technical support to the CPUs
- No current framework for inspection and monitoring of CPUs exists. This is recognised as a gap - and discussions are on-going to identify most appropriate mechanisms to ensure compliance with good practice and implementation of standards

30. As an aside, depending on what action the Agency takes if the law is not being implemented – ie if the Agency intervenes and takes action – then it may be that in practice the Agency ends up having an operational / implementation function

31. Although it is known that this aspect is being considered by partners in Albania, including the State Agency and UNICEF

WORKING IN PARTNERSHIP

- **Multi-Agency Working**

The establishment of the model of multi-agency / multidisciplinary working has been highlighted as a considerable success for the CPUs. However this has, until recently, been more because of efforts of the individual CPWs and the attitude of partners, rather than because of structure and organisation since under the 2010 Law those provisions which exist regarding multi-disciplinary working are formulated in a very broad way.

With the exception of the roles of the State Agency for the Protection of Children's Rights, there is little, if any, detail or operational guidelines, nor does the law give clear directions as to the roles and responsibilities of other agencies, over and above the establishment of multidisciplinary teams. For example, while multi-disciplinary teams are to be set up, there are no corresponding duties upon other agencies to attend and actively participate in the work of the team the CPU worker to refer and manage difficult cases.

This necessary cooperative relationship between actors has been recognised and the recent sublegal acts associated with the 2010 Law are much clearer in terms of the roles and responsibilities of other stakeholders. For example requiring the attendance and cooperation of partners. CPWs did feel that this gave them greater authority to call multidisciplinary meetings and place expectations on other actors and were optimistic that this would increase the effectiveness of the meetings although it is too soon to tell what difference this will make in practice. Certainly, there was a strong feeling that concerted awareness raising was necessary in order to ensure the active participation of all agencies. This is particularly the case for border areas, where significant turnover of staff from key agencies (such as police) creates a degree of frustration in workers in terms of needing to reorientation incoming staff on a regular basis³².

Some CPWs reported that in reality only few of members of the teams collaborate and participate actively. For communes the situation is compounded by the fact that there may be few partners in working in the area and so regular multi-disciplinary team meetings are not always held.

There was a strong feeling that the responsibility for child protection is seen as that of the CPU, rather than shared by all agencies. For example, finding someone to accompany the CPW on home visits proves a challenge³³. In some areas the SA has accompanied the CPW on home visits, and is being encouraged to take a more active role in monitoring / identifying families at risk. Again this seems to be as a result of localised arrangements, rather than a

32. All staff working as part of the multi-disciplinary team should be given training so that they are aware of their roles and responsibilities

33. For security reasons a CPW should be accompanied on the first home visit, and thereafter on subsequent visits if it is assessed that there may be an issue regarding safety

deliberate strategy (maybe a symptom of CPW and SA having different lines of accountability). In one location, due to the other commitments of the SA, the cleaner accompanies the CPW. While this is a practical solution, it is hardly ideal!

One idea widely thought that would contribute towards a greater sense of shared responsibility was that when the Protocol is revised it should be renamed as the Child Protection Protocol (rather than the Child Protection Workers Protocol) with a clearer articulation of the roles and responsibilities of other agencies.

Another idea, shared by many, was that the harmonisation and coordination of different processes (for child protection, domestic violence and trafficking in particular) would contribute to more efficient working. It was noted that in practice the same participants tend to participate in these different processes and consequently there was a degree of duplication and overlap.

Almost absent was the involvement and active engagement with community structures as a regular practice. In some areas this happens (particularly when there are services available) but in other areas there appears to be little community engagement. For example, in one location where the council offices are next door to the mosque, no discussion has taken place with the imam to see what, if any, support the mosque could provide. While NGOs have established community protection groups, the quality and engagement of these groups seems to vary from place to place.

World Vision has established community 'Watch Dogs' run on a volunteer basis and made up of parents and professionals (teachers, leaders of the villages etc). These Watch Dogs have been given training on child rights and protection, and are supposed to play a role in their community in terms of identifying cases, sensitising communities and referring cases, and in some cases providing services. However, the Watch Dogs were not mentioned during the study, unless specifically raised, which rather tends to suggest that they may not be as active and effective as imagined, at least in the areas studied.

• **Involvement & Engagement with Service Users**

It was difficult to accurately gauge the level of involvement with services users, partly as the practice for case files varied between sites (this is discussed further in the section on quality of service) and so it was difficult to see what steps had been taken. From discussions with the CPWs it seemed that, at least during the initial assessment, consultation with parents took place, and that parents are invited to multidisciplinary meetings. This was also borne out by the focus group discussion with parents, who felt that the CPW had worked with them to help rather than making decisions on their behalf.

However, with the lack of resources it is difficult to see how sustained involvement and engagement with families (in terms of monitoring and follow up) can be carried out as it was widely reported that home visits were a difficulty. Another challenging area in terms of engagement of the family is when a child is placed in care, as there is a lack of clarity and consistency regarding the follow up that should take place with the child's family. In some places the CPW remains involved, while in others they disengage and hand over to the residential institution / alternative care provider. Where the institution / care environment is a long way from the child's home it is difficult to keep parents connected to the child, and to promote contact / prepared for reintegration, if the family is not visited.

Again, this intersection of the work of the CPU and Social Services highlights the need for the process of the roll out of the CPU model and the reform of social services to be linked.

During the two focus group discussions with children, there was a slightly mixed response, from those who had experience of the CPW and those who had not had contact. In both cases, children were aware that the CPW was there to protect children although, understandably were not sure how this would be done. One young person spoke about how he and friends had phoned the CPW to check if the worker was there and was particularly impressed that the worker had been kind and patient, even when the children were asking jocular questions.

A participatory assessment carried out with 56 children (6-17 years old) in 2011 who had had contact with CPUs identified that all the children who took part in the assessment recognised improvements in their family situation as a result of the interventions of CPU workers (MARIO Project, 2011). However although children were able to give an explanation of the role of the CPU, few children saw the CPU worker as a resource for themselves. It was suggested that this is partly due to the irregular meetings with children / lack of consultation with children but also as a result of difficulties in identifying appropriate space / rooms to meet privately.

A feeling among the INGOs and agencies working with CPUs was that many CPWs were becoming more child centred in their practice, although there is still room for improvement.

Significant Points Emerging from the Study:

- Working in partnership is considered important, but until recently the roles and responsibilities of all stakeholders were not clearly articulated. This has led to a situation where in some locations child protection is seen solely as the responsibility of CPU
- Harmonising different processes (eg CPU, domestic violence, trafficking) would contribute to more efficient working
- It would appear that there is involvement and engagement of services users, including children, to some level. However there appears to be less engagement with local level structures and informal mechanisms to protect children
- Lack of resources contribute towards it being difficult to sustain involvement and engagement, especially when children are placed in institutions or services are not local

QUALITY & SCOPE OF SERVICES

• Competing Roles & Responsibilities

It is useful to highlight that within the 2010 Law there are provisions which are designed to protect the rights of children from all forms of abuse and promote the wellbeing of children, and uphold their rights (specifically Article 21).

Significantly, especially in relation to the situation for trafficked children / children on the move, the law applies to the protection of children both within the territory of the Republic of Albania and also children of Albanian nationality who are outside the country. The definition of a child, consistent with the United Nations Convention on the Rights of the Child, 1989, is anyone aged under 18 years old. Despite this, CPUs can struggle with getting children formally recognised so that they can access those services which may exist³⁴.

Under Article 39 of the 2010 Law, the tasks assigned to the CPU include:

- to assess and continuously monitor the situation of families of children at risk until the child is considered “not at risk”;
- to identify cases and coordinate, in a multidisciplinary approach, the assessment, protection and referral of cases within the territory of the municipality/commune;
- to build community awareness and hold informational, educational and training programmes related to children’s protection in the municipality/commune jurisdiction;
- to cooperate with administrators in the municipality’s social affairs division, school psychologists, family doctors, police authorities, social workers at the public and non-public service centres, on improving the situation of children’s protection in the territory of the municipality/commune;
- to serve as an information centre where children and families in the territory of the municipality may receive information, or referral to support services in line with their needs and situation;
- to periodically report to and provide data to the State Agency for the Protection of Children³⁵.

This wide ranging list of duties can create problems for the CPW. For example, it is very

34. This should not be the case, as for example children should be able to attend school without birth registration, but despite this it was reported that sometimes considerable negotiation and persuasion is needed with schools or with officials in order to obtain the required paperwork. Identifying appropriate accommodation for young people (aged 15 – 18) is a particular problem

35. The data collection by the State Agency and other bodies, such as the CRUs is identified as an issue that needs further development and elaboration – and it is recognised that it is important that data collection is standardised across all those needing information (including municipalities and donors) to reduce the administrative burden on CPUs

difficult to carry out planned awareness raising activities where large numbers of cases are referred which the CPW needs to work with intensively (even though some CPUs do manage to carry out awareness raising). In the same vein it is difficult to raise funds for programmes, which often falls to the CPW, while also responding to cases. This is directly related to the issues of resources and to the lack of coordination between municipalities / communes / the lack of regional planning. More collaboration between neighbouring communes and municipalities might allow for the more effective use (ie sharing) of limited resources, increasing the coverage provided.

In some situations CPUs cover a population of 10 000 - 12 000 thousand, and have only a small number of referrals (average 1 per month) while in others CPUs can cover a population of over 100 000 and have over 70 open cases. Similarly, as has been mentioned previously, it is difficult to follow up cases if there are limited transport opportunities.

Except in relation to the functions of the State Agency, there is a lack of detailed and / or operational guidelines contained within the provisions of the law. Attempts have been made to develop appropriate policies and procedures regarding the work of the CPUs. The most significant of these initiatives is the *Working Protocol for Child Protection Workers* (the Protocol) developed in 2010 by the Ministry of Labour, Social Affairs and Equal Opportunities, Terre des hommes & UNICEF, in collaboration with other agencies and stakeholders. This document contains detailed procedural guidance on the work of the CPUs and the management of cases³⁶, although this document is not mandatory at present.

Under the provisions of the law, the Minister can issue guidelines, and one suggestion that was considered as a possible advancement in efforts to protect children is that the Protocol should be issued by the Minister in order to make its conditions mandatory as this would strengthen the practice and standards of operation for CPUs and other duty bearers.

Again, in relation to resources, a lack of accessible services to support families means that it is difficult to refer cases for support and intervention, especially in remote areas and communes. This is either because the service does not exist, there is no funding or there is no way to transport the child / family³⁷.

• **Accessibility & Complaints**

Accessibility of the CPU would appear to be a problem in some locations. Sharing offices in municipality / commune buildings, with little or no space for private discussion does not help to create an environment where adults and children can speak freely about issues of concern. Additionally, where offices are located on the upper floors of buildings it is difficult to see how these can be easily accessible either to people with small children or with physical disabilities.

In areas where the CPW performs more than one role, there is a lack of continuity of service - this of course also extends during weekends and evenings (when it may be that children are most at risk).

One CPU had developed a leaflet to advise families and partners about the role of CPUs. It does not appear that any CPUs have developed a feedback or complaints procedure.

36. It should be noted that there are some omissions in the Protocol – for example there are no procedures for children in need of immediate protection – however it is understood that there are plans between UNICEF and the State Agency to carry out a comprehensive revision of the document in the latter part of 2012 / early 2013

37. Compounded of course, as has been mentioned previously, by the fact that there is not universal CPU coverage 24 hours per day

• Relevance

Despite the acknowledged limitations and problems, there are some indications that children and families are given (in some places) a service which is more expansive and positive than it might be inferred. For example, while the work of the CPUs and the multi-disciplinary teams as defined within the law are to 'protect, assess and refer children at risk' with no explicit requirement to provide support, services or assistance, one evaluation noted that the evaluators were '*particularly impressed by the determination of Child Protection Units to provide a range of important personal social services that are not altogether conspicuous or measurable*' (Westwater *et al*, 2009, page 16).

The overall conclusion of the 2009 evaluation was that the CPU service, while valid, needed to be expanded with improvements to some conditions such as staff capacities, training, support, resources and interagency working in order to effectively reach all children and to deal with the most complex cases.

In discussion with respondents it appears that two distinct groups of families tend to be identified as needing the intervention of the CPU - those with economic problems, leading to neglect and physical abuse, and severe cases of abuse (typically sexual abuse)³⁸. This tends to suggest that cases of low and medium risk of abuse where the vulnerability factor is not poverty are either not being identified or referred. This points to a gap in the provision of comprehensive protection services, as the important element of proactive, early intervention work is missing. Associated with this, a lack of services, inevitably leads to 'symptom management' as oppose to addressing root causes.

• Record Keeping

The practice, quality and extent of record keeping - specifically individual files for children - varies greatly, and in many cases falls below what would be considered good practice. Files are either lacking in information (for example contacts not being recorded) or lack details of basic action taken. For example, while the assessment (in many cases known as the social report) may be on file, there are no details regarding monitoring and review. Different information may be kept in several locations (for example on the child's file and also in the notebook / diary of the CPW).

The lack of consistency can be attributed at least in part to a lack of guidance in the Protocol as to expectations regarding recording of information. However, even those recommendations that exist (such as files must be kept in a secure location) are not always observed.

In some cases CPWs have developed their own databases, but this tends to more for tracking number of cases in order to report to managers and the CRU / State Agency. The lack of a nationwide database impinges upon information sharing between CPUs, especially when families are on the move.

Comprehensive case files provide:

- A detailed record of the case - useful for if the CPW changes or is absent or the family moves and is transferred to another location

38. Note this is the *impression* because unfortunately record keeping varies so greatly and is in places so poor that it is impossible to verify with any accuracy

- A tool for planning and follow up - as records can remind CPWs of what actions and agreements were made
- A record of action - so that if an incident occurs or an investigation is needed (for example if a child dies) then it is clear what support and interventions have occurred
- A framework for supervision and quality control

Given this, it is clear that accurate records must be kept, although with the workloads of CPWs it is acknowledged that it is sometimes difficult to regularly update files. For this reason it is important that the requirements for record keeping are carefully considered within the context of what will be useful to the CPU worker in their work with families (otherwise paperwork will not be completed).

The absence of detailed and complete case files means that it is virtually impossible to audit the work of the CPUs and to establish the quality of services provided. Unless this is rectified this will be an additional challenge for the establishment of an inspection framework.

Significant Points Emerging from the Study:

- Wide range of tasks and competing interests for the CPWs mean that in some cases due attention is not given to the full range of tasks - for example balancing awareness raising and preventative work with responding to cases
- There is no consistency across CPUs in terms of ratio of worker to population or expectation of extent / scope of role
- Making the Protocol a mandatory document would contribute to ensuring consistency across CPUs in terms of response and actions
- A lack of a 24 hour service that covers all of Albania means that there is no universal child protection service offered
- Indication that proactive / early intervention work with low and medium risk families may be absent / lacking
- Wide differences exist between records maintained, and information procedures for case files

RECOMMENDATIONS FOR PRIORITY ACTIONS

The introduction of CPUs and their continued development are a positive direction for child protection in Albania. However, in order to further cement their presence and ensure the sustainability and quality of work there are several issues that need attention.

The recommendations outlined in this section specifically relate to priority areas for action in relation to the CPUs, rather than to the development of the child protection system more generally (although of course there are links).

- While the establishment of the CPUs is now defined in law, the requirement to establish a CPU should be a requirement³⁹. Without such provision it will be difficult to ensure that there is universal coverage for protection across the country. Linked to this, sufficient budget / financial resources must be identified so that the CPU can provide an effective service.
- Minimum standards of operation, including case procedures (as outlined in the Protocol), response times, roles and responsibilities and caseloads, need to be introduced and made mandatory in order to ensure parity of service across CPUs. This could be achieved by issuing the Protocol as a guidance document from the Ministry of Labour.
- The Protocol should be revised to reflect current law and practice, including provisions regarding the handling of emergency cases and the roles and responsibilities of all agencies in relation to the protection of children.
- CPU services should be offered 24 hours a day, 7 days per week. This does not mean that a full service should be provided at all time, but that there should be a system for contacting the CPU in an emergency. This could be achieved by the sharing of CPU resources between communes and municipalities. To do this would require a regional coordinating body to rationalise services and / or bilateral or multiparty agreements between municipalities and communes.
- Inspection and monitoring of CPUs is an urgent requirement. This should relate not only to data / number of cases, but also to the quality and nature of the CPU service offered. Inspection should be carried out by an organisation / agency independent to the CPU with staff who have suitable capacity and experience to undertake specialist inspections. This is likely to necessitate training and capacity building. In many ways it would make sense for the State Agency to be responsible for monitoring and inspection, as the agency setting policy and guidance, however this cannot take place if the Agency is involved in the line management of the CPUs (via the CRUs) as this may present a conflict of interests / lack of objectivity.

³⁹. The mechanism for doing this could vary – for example from a new legal requirement to the issue of guidelines from the Ministry – and needs further discussion and examination

- All CPU workers should be suitably qualified - ideally social workers. The definition of social worker, in terms of qualifications and experience should be mandated by law / within the legal and policy framework. In addition, in order to ensure a consistent basis of practice and approach all CPWs should be required to attend standard in-service training during their first year.
- Case supervision should be provided to all CPUs, giving CPWs the opportunity to develop their practice and build their capacities by having the opportunity to discuss cases and explore strategies with someone who has the necessary skills and knowledge to facilitate this process. One way of supporting this would be to encourage experienced CPWs to mentor newer CPWs and to set up groups so that CPWs can peer supervise.
- The provision of CPU services and the role of CPWs should be 'ring fenced' so that they are not vulnerable to changes in the political environment.
- Links with other processes, such as national referral mechanism for trafficked children and domestic violence, should be harmonised to avoid duplication and promote greater efficiency. Similarly the development of the CPU service should be aligned with the reform of Social Services to ensure that there is a unified approach to children.
- The development of specialist support services is urgently needed. Hopefully this can be strategically planned once the reform of Social Services is completed and regional coordination structures are established.
- While it is important to ensure that the most vulnerable families are identified and supported, it is also important to ensure that proactive, early intervention work is carried out with children who are at low / medium risk. Since these families do not seem to be routinely identified, increased awareness raising with stakeholders and communities is necessary.
- More emphasis needs to be placed upon mapping the child protection system at local and informal level in order to identify other partners who could be a resource.

Analysis of Substantive Issues & Recommendations / Actions Needed (According to Framework of ToR)

ISSUE / FEATURE	IMPLICATION FOR PRACTICE & SUSTAINABILITY	RECOMMENDED ACTIONS
<p>Service quality of CPUs (based on roles and responsibilities defined in protocol)</p> <ul style="list-style-type: none"> • Lack of mandatory standards in terms of operation and practice of CPU • Lack of mandatory minimum standards for appointment of CPW, including training and capacity building requirements • Specialist supervision limited • Wide range of responsibilities placed upon CPW, although great variance in profile of locality • Lack of monitoring and inspection • CPUs established in each commune / municipality under the direction of mayors / head of commune 	<ul style="list-style-type: none"> • Without standards that are enforceable, there is no guarantee regarding the quality of service provided, as this is dependent upon the commitment of individual workers • Lack of supervision means that CPWs are not given the opportunity to build their capacity through practice • Case loads and activities dramatically vary between CPUs 	<ul style="list-style-type: none"> • Revision and issue of Protocol as mandatory document to give standards of practice • Introduce standardised in service training for all CPUs, and make this a requirement • Coordination at regional level to ensure rationalisation of CPU and sharing on expertise through peer support and supervision • Identify and introduce appropriate inspection and monitoring mechanism, implemented by appropriately skilled staff • Supervision of CPUs now also responsibility of CRUs / State Agency - although it is too soon to assess implications of this and whether this will take the form of case supervision or statistical information. However, it is likely that CRUs will need substantial capacity building if they take on the role of providing technical support to the CPUs
<p>Impact & effect of CPU service on service users</p> <ul style="list-style-type: none"> • Specialist support services to refer to limited • Little / no budget either for services for families or to ensure that CPU can carry out function • CPU works office hours only and is not currently in every municipality / commune • Location of CPU often in government building, and in shared office • Indication that proactive / early intervention work with low and medium risk families may be absent / lacking 	<ul style="list-style-type: none"> • Emphasis becomes placed on service led planning for children, rather than needs led focussing on best interests of children • Lack of resources contribute towards difficulty in sustaining involvement and engagement, especially when children are placed in institutions or services are not local • No comprehensive coverage by CPU 24/7 = no child protection system • CPU office may be inaccessible to people with disabilities or clients may be dissuaded from attending due to concerns about privacy. This can also create a problem for security of files • Vulnerable and at risk children may not be reached 	<ul style="list-style-type: none"> • Revision and issue of Protocol as mandatory document to give standards of practice • Identification of financial resources to support work of CPU needed • Coordination at regional level to ensure rationalisation of CPU so to ensure coverage across country • Development of specialist support services - coordinated at regional level • Develop services for early intervention - including increasing awareness raising with stakeholders and partners • Ensure CPU workers have suitable working environment / access to space to interview families in private

Challenges for Local and National Governments in strengthening and establishing CPUs

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| <ul style="list-style-type: none"> • Lack of coordinating body at regional level to liaise between CPUs and Social Services • CPUs established in each commune / municipality under the direction of mayors / head of commune • Lack of standards in terms of service level, staffing and supervision and budget for establishment and running costs • Lack of resources - including services to refer families to and financial support of CPUs • No current framework for inspection and monitoring of CPUs • Working in partnership considered important, but until recently the roles and responsibilities of all stakeholders were not clearly articulated • Appears to be less engagement with local level structures and informal mechanisms to protect children • No consistency across CPUs in terms of ratio of worker to population or expectation of extent / scope of role • Wide differences between records maintained, and information procedures for case files • Historical reliance on INGOs, NGOs and UNICEF to support development of CPUs • Lack of clarity in terms of roles of SS / CPW when children accommodated | <ul style="list-style-type: none"> • Lack of services and resources means that emphasis becomes placed on service led planning for children, rather than needs led focussing on best interests of children and difficult to follow up / monitor cases • Child protection can be seen as responsibility of CPU rather than shared across all agencies • Wide range of tasks and competing interests for the CPWs mean that in some cases due attention is not given to the full range of tasks - for example balancing awareness raising and preventative work with responding to cases • Lack of engagement with local structures and informal mechanisms may mean that valuable support services are being overlooked • Lack of service standards and inspection means that there consistency cannot be guaranteed across all CPUs • Lack of appropriate record keeping makes monitoring of cases and inspection difficult to carry out • Loss of funding for INGOs / NGOs mean that activities may be curtailed • Cases of children in care may not be proactively followed up | <ul style="list-style-type: none"> • Ring fencing the post of CPW as a 'technical post' to ensure that it is not vulnerable to change of personnel as a result of changes in local leadership may help increase sustainability • Harmonising different processes (eg CPU, domestic violence, trafficking) would contribute to more efficient working • Revision and issue of Protocol as mandatory document to give standards of practice • Introduce standardised in service training for all CPUs, and make this a requirement • Coordination at regional level to ensure rationalisation of CPU and sharing on expertise through peer support and supervision • Identify and introduce appropriate inspection and monitoring mechanism, implemented by appropriately skilled staff • Supervision of CPUs now also responsibility of CRUs / State Agency - although it is too soon to assess implications of this and whether this will take the form of case supervision or statistical information. However, it is likely that CRUs will need substantial capacity building if they take on the role of providing technical support to the CPUs • Closer liaison and coordination between Social Services and CPUs at regional and national level - including involvement of CPUs in review of social services • Need to increase the functioning of State Agency and Social Services to support the work of CPUs - including developing protocols for areas of cooperation • Guidance needed regarding the level of funding municipalities / communes must ring fence for child protection / include in annual budget to Ministry of Finance - or allocation of funds at central level for CPU |
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APPENDIX A - DOCUMENTS REVIEWED

Legislation & Policy:

National Child Strategy of Albania 2005 - 2010, Republic of Albania

National Plan of Action for Children 2012 - 2015, Republic of Albania

Republic of Albania Ministry of Labour, Social Affairs and Equal Opportunities, Terre des hommes & UNICEF (2010) *Working Protocol for Child Protection Workers*; Albania, Tirana

Republic of Albania, Law Number 10347, 4th November 2010, *Concerning the Protection of the Rights of the Child* and associated sublegal acts⁴⁰

Reports, Papers & Assessments:

BKTF Annual Report 2011; Albania, Tirana, BKTF Coalition

Danaj S (2011) *Situation Analysis on Child Protection System in Albania*; Albania, Tirana, BKTF Coalition

Elmazi E (2011) *Assessment of Social Care Workers Capacities to Work on Protection and Prevention of Child Trafficking Assessment Report*; Albania, Tirana, World Vision

MARIO Project (2011) *Listen & Involve Us More - Child Participatory Assessment of CPU*; Albania, Tirana

Nurkic Kacapor E (2011) *Compendium of Care For The Identification, Referral and Integration of Exploited Children in Albania*; Albania, Tirana, World Vision

Round table recommendations on the successful child protection system models - 27 September 2010

Tdh Albania (undated) *For the development of a Child Protection System in Albania through the establishment of Child Protection Units* (paper)

Tdh Child Relief (2011) *Enhancing Child Protection Systems - Thematic Policy*; Switzerland, Lausanne, Terre des Hommes Child Relief

UNICEF (2010) *National Child Protection Systems - An Overview*; Thailand, Bangkok, UNICEF EAPRO

Westwater G & Jovanovi V (2009) *Evaluation of the intervention of Child Protection Units within the framework of the social protection system reform and social services decentralization in Albania*; Albania, Tirana, Austrian Development Cooperation & UNICEF

World Vision Albania (undated) *Information Sheet on Involvement with Child Protection Units*; Albania, Tirana, World Vision

World Vision (undated) *Scale Up for Child Protection - Unlocking the stalemate between national commitments and localised success* (Briefing Paper)

Forbes B, Luu D, Oswald E & Tutnjevic T (2011) *A Systems Approach to Child Protection - A World Vision Discussion Paper*; World Vision International

Wulczyn F, Daro D, Fluke J, Feldman S, Glodek C & Lifanda K (2010) *Adapting a Systems Approach to Child Protection: Key Concepts and Considerations - Working Paper*; US, New York, UNICEF

Universal Periodic Review, Albania, 2004 - March 2009 to UN Human Rights Council; Submitted by BKTF in collaboration with SOS Children's Village

40. Please note that authorised English translations of the sublegal acts are not yet available

APPENDIX B - TOOLS

Evaluation of CPUs	Tool Reference WV.A.1
<p>Target: Regional Child Protection Advisers</p>	<p>Format: Workshop / Focus Group Discussion (A)</p>
<p>Record of Attendees (names / location / role)</p>	
<p>Questions / Discussion Areas (NB - depending on size of group, may be split into small group discussions / if time allows, use tool reference WV.A.2 - case vignette - otherwise ask about typical case exercise)</p> <p>Introduction and overview of study</p> <ol style="list-style-type: none"> 1. How would WV describe child protection and the work of the CPUs? What are the key activities and responsibilities of the CPUs? How would you describe the contribution and work of the CPUs towards protecting children? Can you think of specific cases that illustrate your answers? 2. Considering either a typical case, or the case vignette (tool reference WV.A.2), what would you expect the CPU worker to do? What would be the next steps, and who (if anyone) would they work with? 3. In relation to the capacity of the CPU workers, where do you think their strengths lie? And their weaknesses? What needs to be done to increase capacity? 4. In relation to resources to what extent do you feel that the work of the CPU is compromised / enhanced by the available resources? Can you give examples to illustrate? 5. In relation to the operational context of the CPUs, what factors limit their ability to protect children? Have there been any positive developments / initiatives that have increased the effectiveness of the work of the CPU / efforts to protect children? 6. What recommendations do you have - either specifically about the CPUs or more broadly about the operating / policy context in Albania - for how to improve the effectiveness of the CPU and the protection of children? 7. Anything else that you would like to add in relation to the study <p>Thanks and next steps / follow up</p>	

Evaluation of CPUs	Tool Reference WV.A.2
<p>Target: Regional Child Protection Advisers</p>	<p>Format: Case Vignette</p>
<p>Kela is 11 years old. She lives with father and mother and two siblings - Tomas who is 13 years old and Edi who is 9 years old. Kela and her family lived in Greece for a while, but recently returned due to the economic conditions. They now live with her paternal grandparents.</p> <p>Kela's mother does not work, and her father works as a labourer on a construction site. Kela's grandfather is retired.</p> <p>Kela has been attending school since she returned. At first the teachers found that she was a good student - she struggled with some classes and it seemed as though she had missed some education, but she was very keen to learn and mixed well with the other children.</p> <p>Recently however, the teachers have noticed that Kela has become very quiet and withdrawn. She has told one of the teachers that her grandfather drinks, and gets very angry. Kela said that there was a big fight at the house over the weekend, and her brother Edi was hit by the grandfather. Apparently, he has many bruises and was not allowed to go to school.</p> <p>Kela's school have contacted the CPU because they are concerned for Kela.</p> <p><i>From the case study, what child protection concerns appear to exist?</i></p> <p><i>What would you expect the first steps for the CPU to be, and when should those actions take place?</i></p> <p><i>Who should they contact / what should they do?</i></p>	

Evaluation of CPUs		Tool Reference WV.A.3
Target: CPU worker		Format: Key Respondent Interview (A)
0.	Introduction to the study & check participant willing to proceed. Name / Agency / Role:	
1.	To contextualise your answers, how long have you been a CPU worker, and what is your background?	
2.	Again, to help contextualise your answers, what does child protection mean to you? What do you think are the main difficulties and child protection issues for children and their families in your operating area?	
3.	From your own perspective as a CPU worker, how do you think the CPU contributes to the increased protection of children? Can you give examples of positive changes / cases that have occurred?	
4.	<p>What are some of the challenges you face in your work?</p> <ul style="list-style-type: none"> • Availability of services / resources / other actors • Working together / multi-agency working • Legal / policy framework <p>What recommendations do you have for improving the situation / addressing challenges?</p>	
5.	Since risk is a critical element of the work of the CPUs, and we want to consider consistency across CPUs, please could you rank the cases in terms of risks (in the risk assessment exercise - Tool reference WV.A.4)	
6.	How prepared do you feel for your role? Do you have regular supervision and support (if so what / how / who?). If you did not know what to do with a case, where would you seek guidance? What training have you been given?	
7.	<p>How do you suggest the protection of children could be improved in your area, and your effectiveness increased?</p> <ul style="list-style-type: none"> • In relation to the operation / working of the CPU • Other areas of change • In working with community watchdog groups / other community protection mechanisms 	
9.	Anything else you would like to add in relation to the study?	
0	Thanks for spending time / advise next steps in relation to the study	

Evaluation of CPUs	Tool Reference WV.A.4
Target: CPU worker	Format: Ranking Risk Exercise
<p>Place the following scenarios in order of risk with 1 being most risk, and 10 being of least risk - accepting that there is limited information to work from.</p> <p>What factors influenced your choice?</p>	
<p>A. A 6 month old baby being shaken by mother</p>	
<p>B. An 11 year old child living on the streets with parents, who regularly move around Albania and to Kosovo</p>	
<p>C. An 8 year old boy living with his parents - there are allegations of domestic violence between the mother and father</p>	
<p>D. A 3 year old child living on the streets with parents, who regularly move around Albania and to Kosovo</p>	
<p>E. A 15 year old boy living with parents - where there are allegations of domestic violence</p>	
<p>F. A 12 year old boy covered in bruises - he reports that his father, who he lives with has hit him</p>	
<p>G. A 12 year old boy covered in bruises - he reports that his uncle, who lives in the next village hit him while visiting</p>	
<p>H. An 18 month baby living alone with a mother who has severe mental health problems and suffers from mood swings</p>	
<p>I. An 18 month baby living with parents and extended family - his mother has severe mental health problems and suffers from mood swings</p>	
<p>J. A 9 year girl who is sent out to beg by her family</p>	

Evaluation of CPUs	Tool Reference WV.A.5		
Review of Selected Files	Format: Checklist based on CP Protocol		
File Reference: Brief Summary of Case / CP Issues:			
	YES	NO	PARTIAL
1. How, when & by whom was the case referred to the CPU? Was any feedback given to referrer?			
2. Does the file contain a basic information sheet? Is this completed?			
3. Is there a complete record of actions taken on the case? Are case notes up to date and complete?			
4. Is there a copy of the assessment on file? Is it complete and did it take place within stipulated time frames?			
5. Was a multidisciplinary meeting held? If so, when, and who attended? Are minutes of the meeting on file?			
6. Is there a care plan / protection plan on file? Have all dimensions of care been addressed and is the plan relevant? Have reviews been carried out in accordance with agreed protocols?			
7. What evidence / how have the views of children been taken into account when developing the plan			
8. Have any home visits been conducted? If so, how many? Are notes of home visits been completed? Is there any evidence that home visits have fed into care planning?			
9. Has the file been reviewed by a supervisor? Does the file contain notes from anyone other than the CPW?			
10. What are the arrangements for storing the file? Is it kept in a secure location? Does any other case information exist that is not kept on the file (eg CPW notebook)?			
11. What are the procedures for case closure? Does the case have outside scrutiny? In what circumstances are cases closed?			
Other comments / observations			

Evaluation of CPUs	Tool Reference WV.A.6
Target: Partner / Senior Manager (eg local NGO and / or Social Services Director, Police)	Format: Key Respondent Interview (B)
0.	Introduction to the study & check participant willing to proceed. Name / Agency / Role:
1.	To contextualise your answers, please describe how you and your agency interacts with the CPU. <ul style="list-style-type: none"> • Nature of your collaboration / working • How long working with the CPU
2.	Again, to help contextualise your answers, what does child protection mean to your agency / you?
3.	What do you think are the main difficulties and child protection issues for children and their families in your operating area?
4.	How do you think the CPU has contributed to the increased protection of children? <ul style="list-style-type: none"> • What positive differences have you noticed since the CPU has been in operation? • Can you give specific examples to illustrate
5.	Where / what do you consider to be some of the challenges for increasing the protection of children? <ul style="list-style-type: none"> • Availability of services / resources • Working together / multi-agency working • Legal / policy framework
6.	How do you suggest the protection of children could be improved in your area? <ul style="list-style-type: none"> • In relation to the operation / working of the CPU • Other areas of change
7.	Anything else you would like to add in relation to the study?
0.	Thanks for spending time / advise next steps in relation to the study

Evaluation of CPUs	Tool Reference WV.A.7
<p>Target: Parents & Families - who have had contact with CPU</p>	<p>Format: Focus Group Discussion (A)</p>
<ul style="list-style-type: none"> • Introduction & purpose of study • Assure confidentiality - purpose to explore work of CPU, rather than to talk about individual family situations • Remind can withdraw at any time, without recourse & check participants happy to proceed 	
<p>Areas for discussion:</p> <ul style="list-style-type: none"> • How did you / your family first come into contact with the CPW? • Did the CPU worker explain their role to you? What did they say? • Do you think that the CPU worker helped your family? If so, how? What were some of the positive changes that have happened as a result of working with the CPW? • Were there things that you wanted that the CPU worker was not able to help you with? If so, what? • Did anything happen as a result of working with the CPU that you were not happy with / about? • Do you think that the CPU took your views into account, and made sure that you were included in decisions about your child and your family? If so how? If not, what could they have done? • Thinking about the situation before you started working with the CPW, how would you rate the difficulties for your child / family (on scale 0-10)....What about now? 	
<ul style="list-style-type: none"> • Check if participants have anything else that they want to add, in relation to the study • Thanks for participating • Explain next steps in relation to the study 	

Evaluation of CPUs	Tool Reference WV.A.8
<p>Target: Children – who have had contact with CPU</p>	<p>Format: Focus Group Discussion (B)</p>
<ul style="list-style-type: none"> • Introductions • Assure confidentiality – purpose to explore work of CPU, rather than to talk about individual family situations. What we want to do is to see how the CPUs work to help children and their families, and to help them learn how to do their jobs better • Remind can withdraw at any time, without recourse & check participants happy to proceed 	
<p>Areas for discussion:</p> <ul style="list-style-type: none"> • Remind children that they were selected since their families worked with the CPU. • What did do they think the CPU worker does? • What kind of person do they think should be a CPU worker? What would the ‘best’ CPU worker be like? • Who met the CPU worker that worked with their family? What were they like? • Did everyone have the chance to speak with the CPU worker and tell them what they thought / how they felt about what was happening in their family? If so, where did you meet the worker, and who was there? • Do you think that the CPU took your views into account, and made sure that you were included in decisions about you and your family? If so how? If not, what could they have done? • How did the CPU worker help you / your family? Did your family being involved with the CPU worker make things better or worse (and how)? • Even if it does not seem like it, CPU workers do try to help children and their families, and they want to know how to do their jobs better. Have you got any suggestions for how they can do their job better? • Anything else that it would be important for me to know? 	
<ul style="list-style-type: none"> • Thanks for participating • Explain next steps in relation to the study 	

Evaluation of CPUs	Tool Reference WV.A.9
Target: National Level Partners / UN Agencies / Government Counterparts / Key NGO	Format: Key Respondent Interview (C)
0.	Introduction to the study & check participant willing to proceed. Name / Agency / Role:
1.	To contextualise your answers, please can you describe how you and your agency interact with the CPUs? <ul style="list-style-type: none"> • Nature of your collaboration / working • How long • Is contact direct, regarding cases, or more indirect
2.	Again, to help contextualise your answers, what does child protection mean to your agency / you?
3.	What do you think are the main child protection issues for children and their families in Albania?
4.	How do you think the CPU has contributed to the increased protection of children? <ul style="list-style-type: none"> • What positive differences have you noticed since the CPU has been in operation? • Scaling 0-10, where would you rank protection of children before / where no CPU? • Scaling -10 where would you rank protection of children where CPUs operate?
5.	Where / what do you consider to be some of the challenges for increasing the protection of children? <ul style="list-style-type: none"> • Availability of services / resources • Working together / multi-agency working • Legal / policy framework • Operation of CPUs
6.	How do you suggest the protection of children could be improved in Albania? <ul style="list-style-type: none"> • In relation to the operation / working of the CPU • Other areas of change
7.	Anything else you would like to add in relation to the study?
0.	Thanks for spending time / advise next steps in relation to the study

APPENDIX C - QUANTITATIVE DATA ON CASES MANAGED BY CPU

A questionnaire was sent out to CPUs asking them to return data regarding the cases they were working with during the period January - June 2012. Seven CPWs completed and returned the questionnaire. Another CPU returned the form, although there was no quantitative data completed.

Given the variance in both interpretation of the protocol and record keeping / case recording, it is not surprising much of the data is incomplete. Due to the small sample size and the paucity of data it is impossible to draw definitive conclusions from the data, which is reproduced here for interest and to compare with observations from the fieldwork.

Summary of Data Returned:	CPUa	CPUb	CPUc	CPUd	CPUe	CPUf	CPUg
NUMBER OF CASES OPENED DURING PERIOD January – end June 2012	17	32	0	19	5	32	6
MAIN REASON FOR REFERRAL:							
Physical (including domestic violence)	2	4	0				4
Emotional	1	5	0				
Sexual			0				
Neglect	1	13	0		5	15	
Trafficking		1	0				1
School Drop Out	7	11	0			3	
Divorce			0			1	
Financial Aid / Poverty		32	0			16	
Medical Aide	6	1					
Unregistered / Support Accessing Services							1
NUMBER OF CASES CLOSED DURING PERIOD:	2		0	26		2	1
NUMBER OF HOME VISITS:	16	124	0		13	47	15
NUMBER OF MULTI DISCIPLINARY TEAM MEETINGS	2	29	2	6		2	6
NUMBER OF NETWORK MEETINGS / ROUNDTABLES	5	6	1	6	6	25	6

