
5 Signs Your Child Protection Policy Needs an Update

What to look for — and what to do about it

Across Asia and beyond, many organisations working with children have a child protection policy. Far fewer have one that is current, understood by staff, and genuinely used when something goes wrong. In our reviews, one of the most consistent findings is not that organisations lack a policy — it is that the policy they have is no longer fit for purpose.

Here are five signs that yours may need more than a quick read-through.

1. You cannot remember when it was last reviewed

International safeguarding standards — including Keeping Children Safe (KCS) and CIS child protection requirements — recommend reviewing your child protection policy at least every two years. Many organisations we work with are significantly beyond that window.

Policies go out of date in several ways. Programmes change. Staff change. The contexts children operate in — particularly online — shift faster than most policy cycles. A policy written a few years ago may not address hybrid environments, new digital communication platforms, or updated mandatory reporting obligations in your country context.

Good practice is annual review at minimum, and an immediate review following any significant change in programme structure, staffing, or geographic footprint — or after any safeguarding incident. The review does not need to be a full rewrite, but it does need to be a genuine check of whether the document still reflects reality.

2. Most of your staff do not know what is in it

A policy that lives in a shared folder and is never discussed is not really a safeguarding policy. It is a safeguarding document. There is a meaningful difference.

In our anonymous staff awareness surveys — part of every ClearPath review — we regularly find significant gaps between what leadership believes staff know and what staff actually know. Common findings: fewer than half of staff can name the designated safeguarding lead; a majority are unsure what to do if a child makes a disclosure to them; many do not know the policy exists or where to find it.

A functional child protection policy is one that staff can describe, in their own words, when asked. That requires more than issuing the document — it requires induction training, regular

refreshers, and a culture in which safeguarding is actively discussed rather than occasionally referenced.

A policy that staff do not know exists is not protecting anyone.

3. It does not reflect your actual context

Many organisations — particularly smaller NGOs and faith-based programmes — begin with a template policy adapted from another organisation. This is a reasonable starting point. It becomes a problem when the policy continues to describe an organisation that does not look like yours.

A strong child protection policy under KCS and ITFCP frameworks should address the specific ways your organisation works with children: residential or boarding settings, home visits, off-site activities, transportation, digital and online contact, photography and media use, third-party and volunteer access, and any specific vulnerability factors relevant to your beneficiary group.

Does your policy address online messaging between staff and children? Does it reflect the cultural dynamics of the communities you work in? Does it name your mandatory reporting obligations under local law? If your policy reads like it was written for a different kind of organisation in a different country — because it was — it will create confusion at exactly the moment when clarity matters most.

4. Roles and responsibilities are unclear or outdated

Every child protection policy should be unambiguous on who does what. Who is the designated safeguarding lead? Who is the deputy? Who do they report to? What happens if the concern involves the safeguarding lead? Who has the authority to decide whether to refer a case externally?

We frequently encounter policies that list roles held by people who have since left, or describe escalation pathways to positions that no longer exist in the same form. When a concern arises — and in most organisations working with children, eventually it will — ambiguity about responsibility is one of the most common reasons things go wrong.

Your policy should reflect your current structure. And your current structure should be tested against one question: if a concern were raised tomorrow, would every person in the chain know their role?

5. It has never been tested in practice

Even a well-written, recently reviewed, well-communicated policy can fail in practice if it has never been tested. The gap between policy on paper and practice on the ground is exactly what safeguarding reviews are designed to find.

One of the most revealing exercises in a ClearPath review is walking staff through a realistic safeguarding scenario and asking what they would actually do. Common responses reveal staff who would handle a disclosure directly rather than reporting it; staff who would consult a colleague before telling the safeguarding lead; staff who assume someone else will take responsibility.

A tabletop exercise — walking a cross-section of your team through a realistic scenario — is one of the most valuable things you can do without external support. It surfaces gaps between what the policy says and what people understand, before those gaps matter.

The bottom line

A child protection policy that is out of date, unknown to staff, disconnected from your operational context, unclear on responsibilities, or untested is not providing the protection it promises. It gives leadership false confidence while leaving children exposed.

If any of these five signs are familiar, it is worth addressing them systematically — not because an auditor might notice, but because the children in your programmes deserve the protection a functioning policy is supposed to provide.

A ClearPath Safeguarding Readiness Review assesses your policy framework as one of eight interconnected domains, and gives you a clear, evidence-based picture of where you stand — along with a practical roadmap for improvement.

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