ASSESSMENT SUMMARY

CHILD PROTECTION SYSTEM
GOVERNANCE INDICATORS FRAMEWORK

KIRIBATI
CONTENTS

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<td></td>
<td>• “Yes, restricted” = 0.75</td>
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KEY STRENGTHS AND WEAKNESSES

While Kiribati society has a long-standing tradition of caring, family-oriented, cooperative and flexible support to its children, until recently these approaches remained mostly informal and fragmented. With the development and introduction of the Children, Young People and Family Welfare (CYPFW) Act 2012, the country entered an era of gradual mobilization of a new, comprehensive child protection system. This initial stage includes significant actual progress, ambitious commitments which still have to materialize, and gaps not yet covered with either plans or action.

Strong dimensions:

- **Open Collaboration.** A strong culture of social cohesion and community-oriented consensual decision-making permeates Kiribati’s public administration system and service provision. Existing programmes in child protection are centred on community/family-based solutions: there are no residential services; any interventions, preventive or promotional measures are closely agreed with the kin and community leaders (a principle maintained by the CYPFW Act 2012). The small size of the individual communities and oceanic distances between them necessitates openness to regional cooperation in education, research and policy development. Relations between local and central authorities are straightforward and effective: the central Government as the key advocate of expanding a formal child protection system is funding and directly providing most of the respective services. Where and if local councils wish to they can supplement basic services with additional initiatives. Even the poorest islands were shown to have some underutilized potential and enough authority to mobilize extra local revenue.

- **Strategic Anticipation.** Rules for data collection, budgeting, staff management and service provision are sufficiently flexible to react to unforeseen contingencies and to foster innovation. Existing strategies in child protection, such as the National Youth Policy 2011-2015 highlight potential sources of new alerts: new risks and vulnerabilities among young people related to economic and social changes. During 2012-2013, the Government set up national structures for Disaster Risk Management and Climate Change Anticipation, with an explicit role for the Ministry of Education for addressing child protection disaster-related risks.

- **Agility.** The Government began to modify institutional structures for child protection making them more responsive to the variable needs of the vulnerable children. Inter-agency coordination was taken over by an executive sector-level Working Group which meets regularly and is an effective decision-maker. The CYPFW Act 2012 streamlined the previously informal rules for gatekeeping and referrals, which should gradually lead to addressing every child’s situation through a clear procedure focused on the child’s best interests. Comprehensive training in child protection was provided to the social welfare and police staff to make sure that they are in a position to recognize and respond to protection risks in an optimal way.

Weaker dimensions:

- **Resilience.** At the moment, the weakest dimension of the Kiribati’s child protection system is lack of arrangements to acknowledge and analyse poor performance in order to build on any setbacks constructively for the future. The lead ministry has not yet capitalized on the Government’s new Monitoring and Evaluation system (finding it difficult to come up with measurable targets and to analyse them consistently). The staff performance evaluation system is biased towards punitive disciplinary enforcement, with no tools to constructively gather feedback on mistakes and barriers. There is no benefit system to stimulate extra effort. Spending is not analysed in terms of achieved results to enable modifications and increasing value for money. Value-changing programmes proclaim the importance of building on the positives, but concrete models and messages were not yet documented.
• Navigational leadership. A major difficulty the Kiribati Government is facing in developing its child protection system is lack of a collective sense of the current situation so that all partners could confidently embrace the proposed direction of change. There is no integrated statistical picture of the current resources used (financial reporting is weak; personnel accounting and payroll control are not coordinated, creating overpays and ghost workers); data on the child protection outcomes are scattered across isolated sector-level databases, which have multiple gaps and is often outdated. There is no system for physical inspection of service providers to assess their number and quality. Knowledge of public attitudes is not systemically collected and is mostly related to gender-based violence rather than aspects of child protection as such.

• Predictive learning. On the one hand, the CYPFW Act 2012 installed an ambitious reform agenda and it was also explicitly recognized in the country’s overall Kiribati Development Plan (KDP) 2012-2015. However, it is still difficult for the Government to formulate actionable, relevant and realistic priorities. Analysis of the current patterns (to identify intended change) is weak: ministerial staff does not receive enough statistical training and do not fully utilize existing data, either for developing policy documents or to cost and defend budget proposals. Strategic plans with exact mid-term and annual action points were not formulated either for the lead ministry or for the inter-agency working group dealing with child protection; even in the KDP child protection outputs have incomplete and vague targets. Exact standards for service provision were not yet developed.
Current progress

• Although participation in international treaties is an uphill battle for Kiribati because of the country’s small size and remoteness, it steadily expands its child protection commitments and improves actual compliance even where formal reporting is behind. At the moment, Kiribati has signed 10 of 28 relevant conventions, which includes adoption of ILO Conventions on Minimum Age and on the Worst Forms of Child Labour (2009), Convention on the Rights of the Persons with Disabilities (2013) and withdrawal of all reservations to CRC (2014).

• In 2012-2014 Kiribati introduced the break-through Children, Young People and Family Welfare (CYPFW) 2012 Act – a comprehensive framework for child protection including internationally compatible definitions, clear division of roles, reporting and referral rules, as well as mechanisms for assessment, intervention and enforcement. The CYPFW Act 2012 is an ambitious roadmap to building a functional child protection system starting from a relatively low base, which explains why many of its approaches currently exceed existing capacities. However, steps (described further) are being constantly taken to catch up and allow for gradual “mobilization” of a new CP system.

• In parallel to ground-breaking child protection developments, Kiribati works to build an overall national strategic planning system. The latest round of mid-term planning reflected in the Kiribati Development Plan (KDP) 2012-2015 incorporates a range of innovations. First, it is the first mid-term plan to include specific child protection objectives (previously the focus of welfare initiatives was mostly on gender). The KDP Policy Area 5 (Governance) includes two outputs related to development and promotion of regulations which would be conducive to the CRC and wider access to protective services by all children and women (including legal aid and counselling). Moreover, there is considerable familiarity and ownership of these objectives among implementing staff: half of the mini-survey respondents mentioned these outputs as top-three priorities in the child protection area. Second, the current KDP was developed in conjunction with massive public financial management (PFM) reforms. For the first time, it is linked to a Medium Term Fiscal Framework (MTFF), as well as strategic plans and budgets of the line ministries.

• The Government established an effective executive inter-ministerial Working Group (WG) to lead in policy design and implementation. Unlike the initial coordination body – the Kiribati National Advisory Committee on Children (KNACC), established as part of the CRC implementation mechanism, the executive WG is an integral part of the newly emerging KDP-oriented planning system, linked to the Government’s own budgeting and reporting arrangements. Composed of Deputy Secretaries of relevant ministries (plus technical staff and NGOs), meeting on a monthly basis, the WG has sufficient authority to ensure coordination and oversight, especially in Kiribati’s political context which is dominated by the Government rather than non-executive stakeholders. RECOMMENDATION: To further strengthen coordination with and within the NGO community, and to invite and assist the Kiribati Local Government Association (KILGA) to share its recent successful experience of transition to self-funding after graduation of donor support with the Kiribati Association of NGOs (KANGO), which has not been functional since donor core funding expired in 2010.

• Coordination with the Justice Sector is developing through: legal reforms building on previous non-legislative policies for Court diversion and community-based policing (a new Juvenile Justice Bill currently considered by the Parliament); expanding the network of Domestic Violence and Sexual Offences (DVSO) units; and comprehensive child protection training which was provided to the entire police force.

Open challenges

• The recent fundamental improvement in the organization of Government’s strategic planning and evaluation cycle has not yet fully extended to the social welfare sector. The innovative Results
Matrix to monitor implementation of the KDP 2012-2015 failed to identify verifiable progress indicators for its Child Protection outputs. Reorganization of the former Ministry of Internal and Social Affairs (MISA) into a Ministry of Women, Youth and Social Affairs (MWYSA) and a Ministry of Internal Affairs (MIA) led to delays in agreeing the sector’s mid-term and annual plan which is supposed to be used for results-based reporting to the National Economic Planning Office (NEPO).

**RECOMMENDATION:** After the introduction of the CYPFW Act 2012, former MISA jointly with key donors planned to complement the Act with a “Monitoring and Adaptation System” (not yet in place but keenly awaited by all partners). It is important to make sure that this system is developed as part of the KDP M&E framework and is incorporated into the sector multi-annual plan and results matrix (rather than being a separate document and process).

- Kiribati has exceptional positive experience in striving to explicitly combine customary and constitutional law through a highly consultative process, but the current dual system remains ambiguous and risky for the children. The Kiribati Constitution protects fundamental human rights, but contains no specific provisions on the rights of children. While most of these rights were covered by the CYPFW Act 2012, lack of their incorporation within the supreme law is a constraining factor, especially given the ambiguities with regard to interpretation of customary law. Unlike many Pacific neighbours, The Kiribati Constitution does not refer to customs as a formal source of law and provides an opportunity to interpret fundamental rights as having priority over custom. However, the Laws of Kiribati Act 1989 explicitly recognizes customary law and allows courts to refer to customary law selectively in cases related to adoption, marriage, divorce, custody and guardianship. Provisions for choosing between constitutional and customary rules are vague and have no guidance on protection of children’s rights (e.g. in cases of “te kabara bure”). **RECOMMENDATION:** Recent broad consultations conducted to develop the CYPFW Act 2012 could be used as a springboard for further dialogue to amend current ambiguities in the Laws of Kiribati Act 1989 (and/or Constitution) with regard to child protection issues. This process could be leveraged by a similar recommendation made by the PSC RRRT in the area of gender-based violence.

- Despite Kiribati’s cultural preference for indirect consultations and consensus decision-making, the country’s Parliament (Maneaba ni Maungatabu) has very weak capacity for policy analysis to effectively support a child protection agenda. **RECOMMENDATION:** Systemically engage the professional Secretariat of the Maneaba ni Maungatabu into child protection forums (such as the Sector Working Group meetings or public consultations) and supply them with user-friendly communications on needed policy changes along with technical argument such as prevalence data and research evidence on the impact of child abuse.

- Kiribati does not have a clear policy or practical guidelines on addressing child protection issues through the health sector. The health sector strategic plan for 2012-2015 includes some potentially relevant goals, but none of them is operationalized into programmes which would be specific to protecting children (e.g., outputs related gender-based violence focus on improvement of facilities and broad training for staff without specific coverage of child abuse, respective support and referral guidelines). Child protection is not yet part of the curricula for medical students. **RECOMMENDATION:** Develop a practical child protection manual for health centres and hospitals to cover identification and response to episodes and risks of child maltreatment and collection of relevant data (in conjunction with a broader Data Management and Surveillance policy discussed below). Include this information as a module in the curricula of the Kiribati School of Nursing. Liaise with MHMS to include respective objectives into the Health Strategic Plan 2016-2019.

- The CYPFW Act 2012 does not mandate teachers to report episodes or risks of child abuse. The new Education Bill is said to prohibit corporal punishment, but it is not clear what other elements of child protection it would deliver. The Education Sector Strategic Plan 2012-2015 is silent on child protection issues and no national policy on the issue seem to have been developed. While some teachers receive child protection training within the Child Friendly School programme and through the counselling courses in the Kiribati Teachers College, there is no systemic provision of relevant training. **RECOMMENDATION:** Start developing a child protection policy for schools, including a simple practical manual for the teachers which could be taught in the KTC and with a clear link to the broader Data Management and Surveillance policy discussed below. This could be done through closer links with AusAID/UNICEF/UNESCO Kiribati Education Improvement Program (KEIP) and the Kiribati Education Facility operated by the Coffey International Development.
DOMAIN 2. PUBLIC FINANCIAL MANAGEMENT

Current progress

- In 2009, Kiribati went through a Public Expenditure and Financial Accountability (PEFA) Assessment led by the ADB. This assessment identified a range of weaknesses which were fully taken on board by the Government. In March 2010, it announced a major PFM reform based on the Kiribati PFM Plan 2011-2014, currently implemented with support from an ADB Technical Assistance Project funded by AusAID. Key directions of change include much stronger integration of donor activities with Kiribati’s own PFM system and new ways to organize and monitor spending. Many of the new rules and changes were consolidated in new Government Finance Regulations 2011, complementing the country’s core Public Finance (Control and Audit) Ordinance (Cap. 79).

**RECOMMENDATION:** This assessment and its suggested action points to the MFED could be presented to the PFM system development partners to seek their leverage (in particular, the ADB, AusAID and the PFTAC, which leads the Pacific PFM Roadmap, to facilitate reforms at the regional level and which promotes PEFA analysis across PICs).

- One of the strongest elements of Kiribati’s budgeting system is the relatively well-balanced combination of spending flexibility and accountability in the allocation of public funds. Administrative heads can transfer funds between budget programmes without excessive formal clearance rules, and yet the actual amount of such transfers remained reasonable and transparently recorded, attaining the highest PEFA score for this indicator already in 2009. The new Government Finance Regulations 2011 further specify rules for internal virements of funds between budget lines. Adjustments to initial budget appropriations which happen once or twice a year rarely exceeded 5 per cent and usually increased allocations to subsidies and grants, although MISA was also a frequent beneficiary (there was no instance when estimates were decreased or moved between ministries). Accounting officers within individual Ministries are encouraged to set aside some amounts for unforeseen contingencies and there is a separate mechanism of Contingency Warrants to fund larger emergencies.

- The CYPFW Act 2012 clearly defines the Director for Child and Family Welfare as a key gatekeeper and purchaser of services and explicitly outlines the possibility for “agency agreements” in delivering the child protection duties. Article 9 requires that “any agreement and delegation must be in writing and signed by the Secretary and the appropriate organization or person.” The CYPFW thereby suggests a possibility for service purchasing under a rule which is flexible and practical, especially given that the supply of possible providers in Kiribati is still very small.

- Child protection funding in Kiribati is constrained not only by objective external challenges (such as the country’s isolated geography and small size) but also by the way existing limited resources have been traditionally managed. The Government’s overall fiscal policy in the past years has become increasingly risky. Excessive reliance on highly volatile fishing license fees, inefficient State Owned Enterprises (SOEs) and weak expenditure management led to growing deficits. Until recently, these were covered by drawing down on the country’s Revenue Equalisation Reserve Fund (RERF) - all sovereign wealth fund established in 1956 to store Kiribati earnings from phosphate mining. However, RERF assets have already declined during the crisis as a result of exposure to problematic banks, and further reliance on these revenues to expand Government’s social spending is unsustainable. Since 2012, the Government started using international advice to streamline its finance by reforming the SOEs, boosting revenues through private sector development and new taxes. But making ends meet would not be possible significant fiscal consolidation. At the moment, child protection professionals are generally uncertain about trends in their sector spending and oblivious to the prospect of cost-saving. There has been no discussion so far on the need to establish benefit targets and to start auditing programme performance rather than just expenditure compliance (that all spending was according to approved purposes and within proper authority) and accuracy (adherence to proper procedures and requirements). **RECOMMENDATION:** (1) Invite the MFED to make regular (e.g. annual) user-friendly presentations on the strategic fiscal situation and plans to the sector working group; (2) Request the Kiribati Institute of Technology and the Office of Te Beretitenti to share their experience in cost-benefit analysis for climate change.
programmes with the child protection Working Group to explore what programmes could be delivered more efficiently; (3) Invite the Kiribati National Audit Office (KNAO) to explain to the child protection Working the current plans to introduce performance audit (as specified on its website).

• Since the MFED began building three-year fiscal forecasts in 2011, they remained accurate, conservative and almost directly translated into annual budgets. Moreover, whenever additional allocations were approved during the year, these were eventually not fully absorbed. However, these mid-term forecasts are released without any explanation of the Government’s policies and of how they translate into spending ceilings by individual administrative heads. This obscures analysis; for example the significant expansion of spending on the former MISA (combined costs of MIA and MWYSA) in 2014 masks the fact that it resulted from administrative costs of the ministerial split while the actual MWYSA programmes have shrunk. **RECOMMENDATION:** It would be useful for the MFED to extend its current format of presenting annual budget projections by attaching a brief narrative explanation of key revenue and expenditure decisions. This request could be facilitated through the ADB/AusAID as the key partners for the current PFM reform.

• Under the new PFM rules, both recurrent and development budgets are shaped through a process which contains significant opportunities for the line ministries to propose and argue for their projects and ideas. Every ministry and inter-ministerial working group must submit their budgets based on costing clearly linked to strategic and annual plans. These costings are prepared within broad sector envelopes defined by the MFED, with significant flexibility to propose allocations explaining “verifiable need” for the expenditure. Development project proposals must be issued by inter-ministerial Sector Working Groups (rather than individual ministries), highlighting the link to KDP KPAs, cross-cutting focus and the national lead. These proposals are reviewed every two months by the Development Coordinating Committee (DCC). However, these opportunities are systemically underutilized. The ministries are not aware that there is scope for them to be proactive if due technical argument is attached. Moreover, the ministries are very passive in the DCC: proposals are not explained, not supported with realistic ideas for potential international partners, and not even followed up. **RECOMMENDATION:** Key ministries in the Working Group, and especially MWYSA, need support in developing their own budget proposals to MFED and the projects they represent in DCC. Any costing initiatives should be primarily linked to these processes rather than parallel stand-alone exercises. The ministries should also take more proactive role in negotiations with the MFED and DCC, relying on costing data and evidence-based benefit targets.
CURRENT PROGRESS

- The CYPFW Act 2012 opened an era of capacity mobilization to build a child protection system of an entirely new scale and standard. Development of the CYPFW Bill during 2011-2013 was in itself an activity which included wide trainings, consultations and awareness raising among child protection professionals across the Government.

- The CYPFW Act 2012 introduced a requirement for all non-state providers of children’s services (individuals or organizations) to register with the lead Ministry and to comply with a set of professional standards. These standards are currently limited to the generic compliance with the CYPFW Act, but the Act mandates the Ministry to operationalize them into more specific guidelines. Given that this new requirement is limited non-state providers only, the public servants (which represent the bulk of the social work force in Kiribati) are not covered. Social workers and other professionals working with children must comply with the Post Qualification Requirements, PQRs (minimum level of education and relevant experience); but these criteria are more demanding to teachers and medical professionals (above Nurse Aids and Health Assistants) than to welfare staff, who are generally classified as comparatively lower ranks.

RECOMMENDATION:

1. As MWYSA begins developing the CYPFW-mandated standards, it could consider making them broader to cover public employees as well as non-state providers. In addition to quality control, definition of professional standards is critical for formal recognition of the social work profession, raising its social prestige and attractiveness.

2. In addition to the Minimum PQRs, eight categories of civil servants are subject to Alternate PQRs (technical education; stronger specification of relevant experience and particular skills). These include Police, Teachers and Medical staff but not Social Workers. Introducing an Alternate PQR for the welfare professionals and child protection in particular is one way to standardize this service.

3. Interviewed professionals in Kiribati strongly own and respect an “Unwritten Code of Ethics”. These informal rules could be used as a platform for the future development of the CYPFW-mandated standards and/or the Alternate PQRs for the civil servants working with children.

- Kiribati benefits from access to overseas tertiary education, in relevant disciplines mostly the University of South Pacific (USP) and the Australia-Pacific Technical College (APTC), although there is a deficit of opportunities for shorter, vocational qualification programmes. There is also a system of Human Resource Development (HRD) for regular upskilling of permanent civil servants which is integrated into the performance evaluation cycle and includes opportunities for overseas placements. Moreover, the Government’s National HRD Plan 2012-2016 extends not only to civil servants but also private sector and NGOs. This Plan is based on a prior diagnostic analysis which showed that 22.2 per cent of civil servants were below their assumed PQRs (identifying “education gaps”), but none such gaps were detected in the (former) MISA. The Plan includes a scholarship programme to sponsor studies for skills necessary to KDP implementation. The least of priority degrees for such funding in 2015 included Public Health, Gender and Social Work, Gender, Women and Development Studies.

- Most child protection specialists are employed by the Government and consider this job to be a very favourable career prospect (given that the public sector strongly dominates Kiribati economy and labour market). They are also broadly comfortable with their comparative standing against other civil servants of the same rank. However, there are still signs of discrimination of child protection duties: key relevant posts in welfare and health sector rank belong to lowest salary scale levels (unlike teachers). In the health sector in particular, comparatively low salaries and poor work conditions among nurses (as well as availability of alternative opportunities available overseas) lead to high turnover which, in turn, was shown to be one of the biggest barriers to effective frontline service delivery.
Open challenges

- Apart from the social welfare staff, the only other Government sector offering systemic training on child protection issues is police. UNICEF helped the Government to establish a permanent training facility offered by the Kiribati Policy Academy (KPA) (including training of future trainers), which now offers a child protection module as part of regular induction for all new police recruits. But even basic regular training in child protection issues is lacking in the Education and Health specialists (some consulted professionals proposed extending such training also to the Statistics and Finance specialists). The curricula of either the Kiribati Teachers Colleague (KTC) or the Kiribati School of Nursing (KSN) do not seem to have any relevant courses. **RECOMMENDATION:** Extending child protection modules to Health and Education professional curricula through the KTC and KSN is critical to gradual build-up of inter-agency links to these sectors. This could be done in cooperation with the KPA with a possibility of using their relevant experience and potentially also the trainers.

- Although the Government operates a formal system for performance evaluation, it fails to make sure that the capacities of the current workforce are utilised to their full potential. There several inter-related features of the current approach which seem to explain the current under-utilization.

  - There are clear rules for annual performance appraisal (Annual Confidential Reporting), which affects both the training needs and progression through the salary scale. But studies and interviews question whether formal appraisals (often introduced at donor requests) help to constructively identify and address problems in performance.

  - Both formal appraisal and the (highly punitive) disciplinary system rely primarily on the criteria of common competences rather than particular post duties and objectives. Common competences are very important. Unlike post duties and workplans, they are mentioned explicitly in the National Conditions of Service (NCS) and in the formal template of the Annual Confidential Report. Additionally, all employees are subject to strict system of disciplinary measures for misconduct, with particular emphasis on the standards of conduct, dress, dealing with public and compliance with working hours. The mini-survey in this assessment confirmed that employees tend to associate their work objectives with common competences (punctuality, confidentiality, politeness) rather than post duties and workplans.

  - While all civil service posts are required to have written Job Descriptions, these are excessively generic (in particular, they do not clearly outline child protection duties). Civil servants are also expected to have individual workplans (which, in principle, should be used in annual appraisals), but none of the interviewed professionals mentioned that they consistently use this tool (and 23 per cent stated that they identify their work objectives by themselves without any tool, document or clearance).

  - Annual reports are prepared jointly by employees and their immediate supervisors and submitted to the Secretary of the Public Service Office (PSO). In reality, the key role in appraisal of field officers on the Outer Islands is played by the Clarks, even if these officers formally report to the headquarters. Given their physical proximity, the Clarks are perceived as “the eyes of the central Government on the island” and report to the headquarters on any problems or poor performance of the field staff, affecting their appraisal and sometimes leading to reprimands.

**RECOMMENDATION:**

1. **While it would be beneficial to extend Job Descriptions to incorporate child protection elements, the key tool which needs to be strengthened is the annual Workplan.** It is important to encourage line managers, countersigning officers – and especially the Clarks – to better utilize performance appraisal cycles to motivate staff. In particular, it is important to invest time and effort into development of concrete and measurable annual workplans and to begin appraising professionals (with respective impact on their salary progression) not only against their core competences but also against these post-specific objectives.
2. Performance appraisals should contain a visible and mandatory section for assessed officers to explain barriers to achieving their goals and any practical needs. Consultations showed that at the moment practical ways of communicating such feedback are very limited, leading to situations where barriers persist even where they could be easily addressed at the headquarter level.

3. The system of sanctions is too focused on administrative misconduct. Once the MWYSA develops the new standards mandated by the CYPFW Act – and if these standards are extended to the public service employees – a systemic approach must be found to sanction violation of these standards. This would be in line with the NCS requirement to comply with officers “orders, regulations and general instructions.” It should also be flexible and constructive, helping to improve performance and learn from mistakes.

4. These changes could be advocated through a stronger liaison with the PSO which is currently in the process of signification revision of the NCS.

- The system of staff motivation is non-existent. Potential rewards for good performance stipulated by the NCS are limited to one-off awards for new educational attainments. There is no system of bonuses or other incentives for exceptional performance. Lack of motivation was quoted by some studies and consultations as a potential reason for absenteeism and attrition, which was a problem throughout the civil service. **RECOMMENDATION:** It is critical to introduce a system of awards for child protection specialists. These awards do not have to be financial and could focus on formal recognition of exceptional effort (honorary certificates and titles, extra leave, opportunities of additional training etc).

- Small size of the social work force in Kiribati and its physical remoteness makes it difficult to associate into professional organizations. Even at the level of NGOs, Kiribati Association of NGOs (KANGO) found it difficult to achieve sustainability. This deprives Kiribati welfare specialists of professional contacts and development opportunities. **RECOMMENDATION:** One possibility is to strengthen liaison with the Fiji Association of Social Workers (FASW) which is at the moment trying to scale up its activities after several less active years.
Current progress

- Collection of child protection data in Kiribati is not yet well developed, and these early stages of system design offer considerable opportunities. At the moment, rules for data gathering and exchange are highly flexible, and there do not seem to be any legislative or institutional barriers to introducing new templates, data sharing protocols and even new surveys. The National Statistics Office (NSO) is mandated by the Statistics Act 1997 to supply data needed for policy purposes, and is generally open to proactive requests from data users for data provision, processing and explanation.

- The biggest opportunity is the CYPFW Act 2012 which explicitly requires the lead Ministry (MWYSA) to “maintain an information management system on children and young people” and which also gives the MWYSA Director the power to request due cooperation from any other Government division or agency, including “information needed to ensure child protection and to ensure implementation of the CYPFW Act”. At the moment, there is no concept of such system. Moreover, unlike Health and Education sector, there has been no systemic mapping of the current data flows. Information relevant to child protection is fragmented across sectors (collected by at least seven agencies), which operate their own separate databases according to internal ministerial rules.

Open challenges

- With the current fragmentation, child protection data is not standardized. The three core stakeholders – Police, Education and Health ministries – operate entirely separate, rather advanced databases without any reconciliation of concepts, definitions and disaggregation criteria for the purposes of child protection. **RECOMMENDATION:** It would be strategic for MWYSA to start with a full-scale mapping of the existing data. Based on this analysis, MWYSA should develop a concept/policy for an integrated Child Protection Management Information System (CP MIS). Ideally, this system should be linked to the surveillance mechanism, which would use collected information to identify children at risk of abuse. The future system should either include an integrated database or a simple rule for regular standardized data sharing led by MWYSA. The key part of the concept should include a clear set of definitions agreed with the participating agencies.

- Current data sets seem to contain significant gaps in scope and coverage. While a full picture could only be assessed through systemic mapping, immediate gaps include:
  - Focus of the MWYSA reports on case management information (excluding cases of children being at risk and other preventive policy variables);
  - Weakness of coverage of outer islands in the police DVSO statistics;
  - The focus of the education statistics collected through KEMIS on enrolment and infrastructure, without any information collected on child safety in educational settings;
  - Lack of child protection variables in the health statistics;
  - General lack of comprehensive labour statistics making it difficult to track child labour issues (there has been no labour market survey and all labour statistics based on information from the Census and the HIES, which are insufficient).

**RECOMMENDATION:** Sector-level databases could be extended. In particular, the Kiribati Education Management Information System (KEMIS) and the Health Information System (HIS) should be extended to cover child protection data. The MWYSA led sector Working Group should include the Ministry of Labour and Human Resource Development (MLHRD) which is working in partnership with NSO with support from the ILO to develop child labour databases.
• Earlier experience of developing information management systems in the Education sector in Kiribati showed that one more inconsistency in concepts and definitions that may be problematic is the lack of coordination between the data standards used by the Kiribati ministries and those which are used by the donors in the regional setting. In the Education sector, the 2010 review showed that the KEMIS system was tailored very specifically to the needs of the ME and was not suitable for regional comparisons. **RECOMMENDATION:** In developing the definitions for the future CP MIS, coordinate with the regional CP databases to ensure future compatibility.

• MWYSA seems to be one of the ministries which do not have a designated statistics unit (unlike the Police, Ministry of Education and Ministry of Health and Medical Services). If this is indeed the fact, the Government would need to decide which part of the MWYSA could lead in MIS development and maintenance as mandated by the CYPFW Act. Unlike designated statisticians in other ministries, technical staff in MWYSA below Director level do not receive any training in data management and even available data statistics are currently underutilized. For example, there seems to be no practice for evidence-based argument in the budget negotiations. Moreover, one of the most relevant past surveys – the Gender-Based Violence study undertaken in partnership with the NSO – is not referenced in any programmatic document unlike other regular NSO surveys. Notably, even the ME and MHMS, statistics units were found to have significant knowledge gaps and the vast amounts of data collected by those ministries are very rarely analysed and used in practice. **RECOMMENDATION:** Capacities need to be dedicated within MWYSA to lead in CP MIS development and respective officer(s) should receive due training and technical support. Additionally, MWYSA and the sector working group should regularly invite the NSO to present existing relevant surveys and respond to any technical questions.

• It has been especially challenging across sectors to ensure that collected data is reliable, consistent and timely. The country’s geography and lack of communication infrastructure has been one of the factors. But in-depth investigations for some sectors showed there are usually other reasons for poor data quality: e.g., in Education, delays and gaps in data submissions are usually caused by lack of meaning and understanding of the purpose of the survey as well as complexity and length of the questionnaire. Moreover, while the Ministry of Education was sending some cover letters to explain data requests, these were irregular and ineffective. **RECOMMENDATION:** It is critical for the success of the future CP MIS to keep it simple and very clearly results-oriented, so that any participating officer is broadly aware about the reasons why data collection is needed and how it is used. In turn, this would not be possible without supporting analytical capacities of the MWYSA to strengthen their actual use of available information for developing policies and budget proposals.

• Kiribati has no national research capacities but there is potentially considerable academic interest to the country and its social policy issues among international donors and overseas research institutions. However, this research is constrained by the country’s remoteness and lack of awareness on research issues and availability of data. **RECOMMENDATION:** The sector working group should take note of open research issues; a brief newsletter with this agenda could be communicated on the Government’s website as well as circulated among key partner institutions such as the USP. The newsletter should contain a brief explanation of the possibilities for cooperation with the Government for interested researches (access to data, possibilities for direct contact with relevant officials etc).
Current progress

• The CYPFW Act 2012 introduced a clear set of rules for all actors in child protection to prevent and respond to suspected cases of child abuse. This includes a clear gatekeeping role for the Ministry responsible for child and family welfare, a referral system, Emergency Protection powers and procedures, and a significant authority for the lead Ministry to seek cooperation and inputs from other agencies where this is needed to ensure child safety. At the moment, there is a strong tradition of informal referral arrangements (e.g. unwritten rules to allocate financial support for transportation to safety of any children in immediate danger and long-standing agreements with faith-based organizations, in particular, the Women and Children Crisis Centre run by the Our Lady of the Sacred Heart Church to shelter children and women requiring protection). Transition to a formal referral system is likely to be gradual and time-consuming.

• The new CYPFW 2012 introduces clear rules and protection for whistle-blowers, although reporting of such concerns is not mandatory and it remains to be seen how it would be applied in practice.

• The CYPFW Act 2012 strongly demands that child protection planning actively involves communities and explicitly discourages removal of children from their families. This resonates with the Kiribati tradition of family-focused solutions (reflected, among other things, in the lack of residential services). However, the wide-spread practice of sending children to live on distant urban islands through kinship arrangements creates vulnerabilities which are not yet systematically addressed.

• As already discussed, the CYPFW Act 2012 establishes a progressive requirement for any provider of services to children to formally register with the lead Ministry and to comply with specific quality requirements (which still need to be developed). Practical implementation of this idea will need to resolve several operational questions. In addition to the actual development of the registration process, standards, control and sanctioning mechanisms, it is still not entirely clear where the new mechanisms will be placed institutionally. After the ministerial split, professional oversight becomes the responsibility of MWYSA, but no structure has been yet created to take up this function (a small NGO section previously hosted within the MISA was retained by the Ministry of Internal affairs). RECOMMENDATION: The evident next step in implementing one of the most promising provisions of the CYPFW related to professional standards and licensing is to make sure that actual standards and registration process are operationalized and taken to practice. This process would benefit from technical support to MWYSA but also from cooperation with other ministries providing frontline services to children (Police, Health, and Education). The standards can be minimal, realistic and functional.

Open challenges

• At the moment, there is no mechanism for regular physical inspections of service providers, although it might be introduced within the new registration arrangement. Organizations engaged in child protection are usually subjected to independent audit only if they use donor funds and have to report to respective organizations. There is also mechanism to collect complaints directly from children (such as a helpline or any other context-specific channel). RECOMMENDATION: Inspections and enforcement should be an integral element of the future licensing mechanisms for the service providers. One proposal voiced during the consultations was to engage the field-based welfare officers into these oversight activities, which was said to be doable within their current time and would raise their motivation and professional prestige.
• There is no requirement and no systemic practice of professional supervision for social workers. The CYPFW Act 2012 states that the lead Secretary is responsible, among other things, for undertaking “education and training on child and family welfare issues”, but neither in this nor in other sections of the Act does it mention specific requirements for professional supervision of social workers and child protection specialists. **RECOMMENDATION:** Consider including a requirement for regular professional supervision into the future operational standards for service providers to be developed by the MWYSA.

• There is currently no systemic surveillance framework. The CYPFW Act 2012 creates grounds for such system: the lead Ministry is responsible for early intervention services and is given sufficient authority to organize a coherent mechanism to identify children at risk and cover them with regular inspections and preventive measures. In particular, the Ministry’s responsibility for maintaining the information management system on children and for developing a integrated child welfare services system should help to start gathering systemic data to identify spots of vulnerability and guidelines on measures to address them. **RECOMMENDATION:** In coordination with the development of the child protection database, develop a systemic surveillance framework to systemically inspect and support children at risk of abuse.
CURRENT PROGRESS

• With support from international organizations, the Government began to implement attitudinal surveys and gradually apply resulting evidence for diagnostic analysis of public values in child protection. The 2008 UNICEF/AusAID/MISA Baseline Report “Protect Me with Love and Care” has been instrumental in highlighting behavioural and cultural factors relevant specifically to child abuse and exploitation. Additionally, the NSO ran at least two gender-based violence surveys: the Kiribati Family Health and Support Study (KFHSS) in 2008 and the Amnesty International Survey on partner violence in 2010. Important attitudinal evidence was also raised through the Demographic and Health Survey (DHS) in 2009. The regularly conducted Census and Household Income Expenditure Surveys (HIES) also contain data on behavioural patterns relevant to child protection (such as smoking and drinking patterns). Some (but not all) of this evidence is used for basic diagnostic of behavioural patterns in the National Youth Policy 2011-2015 (e.g., to identify cultural factors behind sexual violence, substance abuse and conflict with the law).

• While there is no separate Communications Strategy, strategic communication plans and some implementation mechanisms are embedded within the CYPFW Act and the National Youth Policy 2011-2015. The communication component of the CYPFW is very broad and not at all operationalized. On the other hand, the National Youth Policy has a more detailed and practical explanation of the value and behaviour changing objectives (covering attitudes to education, substance abuse, violence, abuse, human rights, inter-generational and gender relations). These plans include some specification of target audience and a basic implementation roadmap.

• The Government appreciates the role of the community leaders and community-based opinion makers and uses this information strategically in building practical communications. While there are no written guidelines, actual field operations use an informal set of principles for building entry points, leveraging messages through island councils, and relying on churches to mediate in discussions with the unimane. **RECOMMENDATION:** (1) Faith-based organizations and churches are significant opinion leaders in the communities and could be involved more proactively as agents of behaviour change (rather than just service providers). (2) consider additional ways of influencing public values, e.g. through engaging Kiribati musicians as was done in the area of climate change.
Open challenges

• The biggest gap is lack of operationalization of communication objectives for other child protection issues and age groups in addition to the National Youth Policy. **RECOMMENDATION:** Similarly to the National Youth Policy, communication plans are needed for other child protection strategies. These could be either consolidated in one document or developed as extensions of the Sector Working Group strategic plan (which would additionally strengthen the inter-agency focus and help to involve other ministries).

• Inclusion of the communication plans into mid-term programmatic documents assumes their periodic revision; and this opportunity is utilized to update the messages with new context and risk factors (the National Youth Policy 2011-2015 is alert to changing vulnerabilities such as further urbanization of South Tarawa, growing exposure to maritime commerce and substance abuse becoming a “modern fashion”). However, revision of a communication agenda once in four years is still too rare. **RECOMMENDATION:** Make sure that mid-term influencing objectives are broken down into operational targets within annual ministerial plans and regularly revised.

• Evidence on child protection outcomes is lacking, which is a gap for possible communications. Current surveys provide only indirect evidence on child abuse; no prevalence data is collected via surveys. Indirect evidence on some child protection issues could be inferred from the existing Census and HIES, as well as the DHS. For example, the Census contains information on teenage marriages and fertility rates, child mortality and school enrolment. However, data on child protection outcomes including prevalence of child maltreatment, child labour etc. is only available from the records of respective authorities overseeing respective service provision. **RECOMMENDATION** In the preparation of the future communication plans, make an inventory of research needs in the area of child protection outcomes and include them into proactive requests to international community, overseas research institutions and the NSO.