

CHILD-SAFEGUARDING POLICY

2018 EDITION

POH

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1 POLICY STATEMENT

Trocar's work is inspired by Catholic Social Teaching, one of the fundamental principles of which is the dignity of each individual. The right to freedom from all forms of exploitation and abuse is implicit in this principle. Underpinned by the organizational value of accountability, it is our policy to safeguard all individuals involved in POH's work against risks of exploitation and abuse. POH will not tolerate exploitative or abusive behavior by anyone associated with the implementation of its work and highlights this as a core commitment in the organization's Stakeholder Accountability Framework. POH recognizes that individuals, women, men, girls and boys in certain contexts may be considered more vulnerable to exploitation and abuse than others, and we make every effort to eliminate such risks from our programmes.

POH particularly recognizes that the need to protect children is of paramount importance. The vulnerability of children to abuse is increased by many factors, including poverty, inequality, violence, cultural practices and humanitarian crises. Children who are exploited and abused are more likely to suffer long-term consequences, including mental health issues, reduced educational outcomes, drug and alcohol abuse and increased likelihood of breaking the law. POH is committed to doing what it can to safeguard those children with whom it interacts, either directly or indirectly (e.g., through the activities of partner organisations), so that they can avail of their right to grow up in safety.

1.1 Scope

The scope of this policy document relates to the safeguarding of children with whom POH staff and other personnel may come into contact while working on POH's international programmes. POH's overarching commitment to protecting all those who may be deemed to be vulnerable in the course of its international programmes is set out in its Position Statement on Exploitation and Abuse.

This policy applies to:

- ✚ all POH employees based in POH offices;
- ✚ employees based in Irish offices, when travelling to or visiting POH POH offices and programmes;
- ✚ representatives working under a contractual arrangement with or on behalf of POH, e.g. consultants or other third parties;
- ✚ Any other official visitor to POH programmes e.g. supporters, donors, journalists, volunteers.

This policy does not apply directly to POH's partners. It is, however, a minimum requirement of funding that partner organisations share a commitment to implement child safeguarding standards and develop their own policies and procedures to prevent and respond to risks of exploitation and abuse of children in all their activities, including projects in receipt of funding from POH.

1.2 Commitment

POH recognises that abuse of power has led, and continues to lead, to many forms of exploitation and abuse. In the environment in which POH works, people can experience disempowerment due to a variety of factors. This can give rise to a power differential between the members of target communities and those directly or indirectly involved in delivering POH's programmes, namely POH staff and the staff of partner organisations. We acknowledge that the potential exists for those who work with programme participants and partners to abuse their position of power. Examples include, but are not limited to, soliciting of payments, requests for sexual favors, intimidation or threats of violence, including sexual violence.

POH recognises that there are specific needs, vulnerabilities and risks that exist for children and is committed to make every effort to ensure children are safe and protected in its international programme work. POH's aim is to ensure that it operates best practice in terms of child safeguarding policies and recognises the legal guidelines governing protection in each jurisdiction in which it works.

1.3 Guiding Documents and Principles

Our approach to child safeguarding work is guided by a number of key international principles and standards as set out in the following: the Universal Declaration of Human Rights (UDHR), the UN Convention on the Rights of the Child (UNCRC, 1989), the UN Convention for the Elimination of all forms of Discrimination against Women (CEDAW, 1979) and in the national laws of the countries in which POH works. We also aim to uphold the commitments made under the "*Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and non-UN personnel*" and the UN Secretary-General's Bulletin on *Special measures for protection from sexual exploitation and sexual abuse* (PSEA) (ST/SGB/2003/13)¹. These commitments prioritise key actions, including practical measures to prevent sexual exploitation and abuse (SEA) and to ensure an effective response when such acts occur.

The UNCRC is ratified in 193 states (except Somalia, South Sudan and the United States)². The four general principles of the UNCRC are:

- ✓ Survival and development,
- ✓ Non-discrimination,
- ✓ Child participation and the right to be heard,
- ✓ Best interests of the child.

Of the 54 articles contained within the UNCRC, the most relevant statements to the current policy are detailed below:

Article 2: Children have the right to protection against discrimination.

¹ <http://www.un.org/Docs/journal/asp/ws.asp?m=ST/SGB/2003/13>

² POH will address its specific approach to child safeguarding in Somalia in the context of any POH-specific response mechanisms that may have to be put in place as part of POH's overall approach to the safeguarding and protection of children associated with its international programmes.

- Article 3: All adults should always do what is best for a child.
- Article 12: Children have the right to an opinion and for it to be listened to and taken seriously.
- Article 19: Children have the right to be protected from being hurt or badly treated.

Where children are the main target population of a partner's activities, or form a substantial proportion of the target population, POH staff should discuss the specific child safeguarding provisions that need to be put in place with the partner. These provisions should be rights-based, taking into account the provisions of the UNCRC and of rights enshrined in national legislation. Specialist agencies (e.g. Save the Children, UNICEF) working locally should be consulted to ensure that the most relevant safeguarding practices are adopted.

This policy outlines procedures to prevent and respond to potential incidents of exploitation and abuse to children and fulfils our commitment to a 'do no harm' approach. Do no harm is a principle that has been used for a long time in the humanitarian sector but can equally be applied to the development sector. It refers to an organisation's responsibility to minimize the harm it may cause inadvertently as a result of its programmes and organizational activities.

1.4 Structure of the Policy Document

This document is set out in a manner that it should provide clear guidance to POH Directors, other POH staff, and third parties regarding their responsibilities in safeguarding and protecting children while they are working with POH on its international programmes.

Section 1 of the document sets out POH's clear commitment to safeguarding children and it sets out in general terms to benchmarks within which it has set its safeguarding standards.

Section 2 sets out a set of 7 standards which, when fully implemented, will ensure that POH is meeting the highest standards in child safeguarding and protection. In addition, the standards are set out in a manner that allows POH field staff to easily monitor progress in the implementation of good safeguarding practice.

Section 3 focuses primarily on striving to ensure that cases of abuse do not arise by having robust safeguarding systems in place.

Section 4 focuses on what field staff are expected to do when an issue arises, clearly setting out the roles and responsibilities of staff. In addition it is also made clear that those in the field are not alone and that, when the need arises, there are systems in place to provide support and advice. At the same time, the specific responsibilities of staff, particularly in relation to their duty to report, is clearly set out.

1.5 Definitions & Terminology

In this document the term Safeguarding pertains to the prevention of harm to children, while the term Protection relates to the response and support mechanisms that are in place should an allegation and/or incident of abuse arise.

Child Abuse is considered under the following headings:

Physical abuse is actual or likely physical injury to a child such as hitting, kicking or shaking, throwing, burning, scalding, or otherwise causing physical harm to a child. Physical harm may also be caused when a care fabricates the symptoms of, or deliberately induces illness in a child. Physical abuse, as well as being a result of an act can also be caused through omission or the failure to act to protect.

Emotional abuse is normally to be found in the relationship between a parent/care and a child rather than in a specific event or pattern of events. It occurs when a child's developmental need for affection, approval, consistency and security are not met. Unless other forms of abuse are present, it is rarely manifested in terms of physical signs or symptoms. Examples may include: conditional parenting, exposure to violence, inappropriate or abusive material, under or over-protection, or emotional unavailability of the child's parent/care

Neglect can be defined in terms of an omission, where the child suffers significant harm or impairment of development by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults, and the failure to access appropriate medical care or treatment. Neglect refers to the persistent failure to meet a child's physical and /or psychological needs as referred to in the UNCRC.

***Note:** Neglect as defined above is prevalent in many countries where POH works due to severe poverty and/or a lack of appropriate social structures and not by intentional abuse by an individual. Applying this definition must take this into consideration and be contextualized to specific situations. POH aims to help reduce poverty and improve conditions of life for people.*

Sexual abuse and exploitation occurs when an individual uses a child for his or her gratification or sexual arousal, or for that of others. Examples of child sexual abuse include, sexual intercourse with a child, intentional touching or molesting of a child, exposure of the sexual organs or any sexual act for the purpose of sexual arousal or gratification in the presence of a child, sexual exploitation of a child including forcing, encouraging, requiring or permitting a child to solicit for, or to engage in, prostitution. **Sexual activity** that occurs between an individual and a child/youth under the age of 18 is not acceptable in any circumstance, regardless of whether he/she may consent or if the individual is unaware of the child's/youth's age. This is irrespective of the age of consent in the residing POH. It includes the inappropriate use of technology and social media; e.g., the storage or dissemination of pornography, the recording or sharing abusive images using technology such as via mobile phone texting, audio, video, images, podcasts, social networking websites and other multimedia or communications platforms.

1.6 Special Consideration for Humanitarian Crises

POH's employees and representatives work in contexts where inequality and need can leave communities and individuals vulnerable or exposed to exploitation or abuse. It is recognized and well documented that such risks

are heightened, in particular, during humanitarian crises. While every context differs, a humanitarian crisis is generally characterized by a breakdown in protective family and community structures, high levels of displacement and family separation, and extreme need – all of which can exacerbate existing vulnerabilities and lead to increased risks of exploitation and abuse.

POH’s Humanitarian Protection Policy and Handbook also offer further guidance in this area and identify safe programming as a core Humanitarian Protection Mainstreaming Minimum Standard. It also makes reference to the connection between security, safeguarding and protection.

1.7 Considerations for the local context

POH works in a variety of geographical locations with great variations in understandings and arrangements for child protection. There are even different understandings of what can constitute child abuse. POH is committed to giving clear guidance to staff, partners and other organisations, including funding organisations, on how the Child Safeguarding Policy will be adapted and applied in these different locations. These guidelines will therefore be applied in ways that are sensitive to different cultures but without condoning practices that are harmful to children. Therefore, where relevant, this policy will also be supported by a document outlining particular in-POH considerations

2 STANDARDS OF COMMITMENT TO CHILD SAFEGUARDING

POH is committed to achieving the highest level of protection for children with whom it comes into contact; its work will be guided by the following set of standards. These standards draw upon the principles outlined in international and regional child rights instruments and commitments. Though the achievement of the standards may sometimes be influenced by factors beyond our control, we commit ourselves to work consistently towards achieving them. It should be noted also that adherence to the standards is achieved through the implementation of a range of relevant policies that POH has in place, which complement and strengthen the organisation’s overall capacity to provide a safe environment for children³.

The standards have been written in a way that makes them relevant and achievable. At the same time, it should be recognized that some may be more difficult or challenging to apply in some countries and local contexts than in others. There is significant variation in local practice and circumstances and POH is committed to adapting the standards and guidelines to fit the local context, as long as such adaptations do not diminish the degree of protection that is provided to children. In all, POH will apply 7 safeguarding standards:

-  Standard 1: Creating Safe Environments
-  Standard 2: Responding to allegations, suspicions and concerns
-  Standard 3: Caring for people involved in a complaint
-  Standard 4: Communicating the “keeping children safe” message
-  Standard 5: Education and training for keeping children safe

³ These include the Whistle Blowing Policy, the Code of Conduct for staff, and the Dignity at Work Policy. See Annex E for a full list.

✚ Standard 6: Implementing and monitoring of the standards

✚ Standard 7: Working with partners to meet the standards

2.1 Standard 1: Creating Safe Environments

The criteria for ensuring the successful implementation of Standard 1 are as follows:

- ✚ There are agreed procedures for recruiting staff, volunteers, consultants and assessing their suitability to work with POH
- ✚ There are written guidelines for appropriate/expected standards of behavior of adults towards children □ POH encourages a culture where children are listened to and respected as individuals
- ✚ There are clear ways by which POH staff or other representatives can raise concerns about unacceptable behavior towards children by other staff or representatives (including a complaints procedure and a whistle blowing policy)
- ✚ There is effective practice for staff on assessments of hazards when working with children
- ✚ Projects and programmes make sure that children are adequately supervised and protected when this is relevant in the context of POH's work with partners and programme participants
- ✚ POH implements effective practice for the appropriate use of information technology including social media

Evidence of adherence to Standard 1

Evidence	Checked
A clear and appropriate recruitment policy	
HR record showing adherence to the recruitment policy in appointing staff and other representatives	
Evidence the recruiting personnel are appropriately trained	
Records of staff signing the Global Code of Conduct	
Procedure for addressing breaches in Global Code of Conduct	
Whistle blowing policy	
Complaints procedures	
Policy on the use of the internet and social media	
Risk assessments for working with children	

2.2 Standard 2: Responding to allegations, suspicions and concerns

The criteria for ensuring the successful implementation of Standard 2 are as follows:

- ✚ There are clear child protection procedures in place that provide step-by-step guidance on what action to take if there are concerns about a child's safety or welfare.
- ✚ The child protection procedures are available to everyone (including children, parents/carers). Consideration is given to making sure that the information provided is easily understandable.

- ✚ The child protection procedures are consistent with international standards and good practice in the protection of children. They also take account of issues that arise as a result of different POH contexts
- ✚ There is a person or persons (POH Directors and Focal person) with clearly defined responsibility for managing allegations of abuse at POH level.
- ✚ There is a process for recording incidents, concerns and referrals, as well as systems to ensure this confidential information can be securely stored.
- ✚ There is a process for dealing with allegations by parents/carers and by young people about unacceptable and/or abusive behavior towards children, with clear timescales for resolving the complaint.
- ✚ There is guidance on confidentiality and information-sharing which makes clear that the protection of the child is the most important consideration.

Evidence of adherence to Standard 2

Evidence	Checked
A copy of written procedures	
A flow chart that describes steps in the process of response to reports or allegations of exploitation or abuse.	
Names and duties of those people with special responsibility for child protection at the POH office level	
Examples of forms for recording details of child protection incidents	

2.3 Standard 3: Caring for people involved in a complaint

POH believes it has a duty to ensure advice and support is available to help people to play their part in protecting children. In the context of POH's work in a wide range of countries, it recognises that parents/carers/children need someone to turn to when children are being abused. Often, such people do not know where to go for help.

The criteria for ensuring the successful implementation of Standard 3 are as follows:

- ✚ Information about where to go for help and advice in relation to child abuse is available in POH's POH offices
- ✚ Staff members with special responsibilities for keeping children safe have access to specialist advice, support and information on child protection
- ✚ In each POH office contacts have been established at a national and/or local level with the relevant child protection/welfare agencies (if they exist) that can provide information, support and assistance to POH staff.
- ✚ Systems are in place to provide support to relevant individuals (including staff, victims and accused) during and following an incident or allegation of abuse or a complaint.

Evidence of adherence to Standard 3

Evidence	Checked
Information on identified support systems and key contact people	
Information about training, advice and support for staff and other relevant people, including children.	
List of contact for specialist advice and information, including on reporting	

2.4 Standard 4: Communicating the “keep children safe” message

POH believes that the effectiveness of its policy and procedures on child safeguarding and protection will best be realized if its stakeholders are aware of them, can contribute to their implementation and provide feedback.

The criteria for ensuring the successful implementation of Standard 4 are as follows:

- ✚ Information about POH’s commitment to keeping children safe is openly displayed and available to the public.
- ✚ Where POH is working with children, they are made aware of their right to be safe from abuse
- ✚ Information and advice for children/parents/guardians, in understandable format, about where to go for help in relation to child abuse is available in POH’s POH offices
- ✚ Everybody at POH Office level knows who has responsibility for child safeguarding and how to contact them. This could include POH’s partner organisations and programme participants.

Evidence of adherence to Standard 4

Evidence	Checked
Published information setting out POH’s commitment to keeping children safe	
Clear information about who are the key personnel responsible for child safeguarding at the office level, including contact details	

2.5 Standard 5: Education and Training for keeping children safe

The criteria for ensuring the successful implementation of Standard 5 are as follows:

- ✚ All field staff, volunteers and other associates are inducted to POH’s policy on child safeguarding and protection when they join POH. All relevant personnel will also be provided with some training on child safeguarding procedures.
- ✚ All field staff are provided with opportunities to learn about how to recognise and respond to concerns about child abuse
- ✚ Where relevant, children are provided with advice and support on keeping themselves safe

- ✚ Staff members with special responsibilities for keeping children safe have relevant training and regular opportunities to update their skills and knowledge
- ✚ Training is provided to those responsible for managing allegations in relation to child abuse and inappropriate behavior towards children
- ✚ Training and written guidance will be provided for staff responsible for specific aspects of creating safe environments (e.g. recruitment)

Evidence of adherence to Standard 5

Evidence	Checked
A copy of training plans and programme content	
Records of course attendance	
Course evaluations	

2.6 Standard 6: Implementing and monitoring of standards

The criteria for ensuring the successful implementation of Standard 6 are as follows:

- ✚ There is a written plan showing what steps will be taken to keep children safe, who is responsible for implementation and when they will be completed.
- ✚ The human and financial resources necessary for implementing the plan are made available
- ✚ Policies and practices are reviewed at regular intervals (at least every three years) and revised according to identified needs.
- ✚ All incidents, allegations of abuse and complaints are responded to in line with the approved systems at the level of the POH Office. Records are maintained.
- ✚ Monitoring of compliance of with **POH's Child Safeguarding Policy** is carried out on a regular basis by each POH office.

Evidence of adherence to Standard 6

Evidence	Checked
A written copy of the Policy on Child Safeguarding and Protection and locally adapted procedures (where relevant) is available in each POH office	
A copy of the monitoring plan and reports of past monitoring exercises are available in each POH office	
A record of any child abuse-related incident that occurred, how it was handled and the outcome.	

2.7 Standard 7: Working with partners to meet the standards

While this policy specifically relates to POH's own staff that are working in the field in relation to its international programmes, it is also committed to working with its partners to support them in meeting the child safeguarding standards.

The criteria for ensuring the successful implementation of Standard 7 are as follows:

- ✚ There is a process of engagement with partners on child safeguarding issues
- ✚ A written agreement between POH and its partners setting out an agreed mutual commitment to the implementation of minimum standards in child safeguarding
- ✚ The existence of (or commitment to development of) a child safeguarding policy and procedures forms an essential part of partnership agreements

Evidence of adherence to Standard 7

Evidence	Checked
Partnership agreements reflect a commitment to child safeguarding and to putting safeguarding measures in place in line with these standards	
Partners' child safeguarding policies	

3 PREVENTION OF EXPLOITATION AND ABUSE

In order to ensure that this policy is implemented and that steps are taken to safeguard children, a number of procedures are in place to encourage a culture of safety and to prevent harm to children in the course of carrying out POH's work.

3.1 Safe Recruitment

POH ensures that appropriate steps are taken during recruitment and selection of employees and representatives, to ensure that issues relating to safeguarding children are considered and addressed. The following have special considerations with reference to child safeguarding:

- ✚ **Job Advertisements:** a note should be included in all job advertisements to highlight that POH aims to protect children against risks of exploitation and abuse, including sexual exploitation and abuse, and implements a Child Safeguarding Policy to support this.
- ✚ **Job Description:** Child safeguarding is referenced in all job descriptions and applies to all employees and representatives.
- ✚ **Interview:** questions in relation to Child Safeguarding should be included in all interviews. It is not expected that all new recruits would have an in depth knowledge of Child Safeguarding unless it is a specific requirement of the role. However, it is important that all candidates are aware of POH's

commitment to safeguarding children and the expectation that all employees recognises, report and respond to incidents of child exploitation and abuse.

- ✚ **Reference Checks** A thorough check of employment references is carried out and includes a question in relation to safeguarding, e.g. “POH aims to protect all programme participants involved in POH’s work against risks of exploitation and abuse, including sexual exploitation and abuse - do you have any reason to deem this person unsuitable to work with children or adults who may be vulnerable?”.
- ✚ **Self-Declaration:** This is attached to the Child Safeguarding Policy (see Annex B) and is a process through which candidates are asked to declare any prosecutions pending against them, convictions of criminal offences, official cautions or other legally binding orders. This should be completed before contracts are signed.
- ✚ **Contract:** The Child Safeguarding Policy for International Programmes, Code of Conduct, Policy Declaration Form and (where relevant) Vetting Form are attached to all contracts and sent to all new employees or representatives before commencing work with POH.
- ✚ **Police Clearance/Vetting:** A procedure through which the national police authorities are required, with the individual’s permission, to disclose any information held on police file regarding criminal convictions or pending prosecutions. It is considered best practice that all employees and third parties with direct access to children through their work are vetted. POH recognises that this is not always possible in each POH where it works. However, each POH office will have to assess local context and procedures to determine what is feasible.

Detailed information with regard to child safeguarding is integrated into POH’s Recruitment Procedures (*POH’s Recruitment Procedure is available on Yammer.*) All employees responsible for recruiting employees and/or selecting POH representatives must read, understand and apply the revisions documented in this policy.

3.2 Code of Conduct

POH’s Global Code of Conduct expresses the expectations of POH for all employees, volunteers, consultants and third parties regarding the conduct and manner in which activities are carried out. It is an integral component of safeguarding which forms part of the contractual terms and conditions of all POH employees and representatives contracted to work with or for POH field offices. Special considerations are made to safeguard children and to prevent sexual exploitation and abuse of any individual.

By signing the Code of Conduct, each employee or third party commits to:

- ✚ work actively to promote the best interests of children and adults
- ✚ act in line with POH’s Child Safeguarding Policy and relevant guides
- ✚ encourage children and adults to feel comfortable enough to point out attitudes and behavior they do not like and make a complaint where necessary
- ✚ Recognises that caution is required in one-to-one situations, particularly in sensitive situations such as dealing with programme participants including children who may be upset or traumatized.

(Examples of unacceptable behavior are listed in Annex F)

3.3 Awareness and Training

POH recognises that raising awareness and providing appropriate training are crucial for improving child safeguarding practices. It is essential that all employees and those engaged in POH's international programmes are aware of the child safeguarding standards and their obligations to implement them. Depending on the role of each employee, different levels of training are provided. However, at a minimum, all are introduced to the safeguarding policy during induction and ongoing refresher workshops and/or training about conduct. POH also commits to communicating the safeguarding message to programme participants through our agreements with all partner organisations.

The following initiatives are either in place or being developed to ensure that employees are equipped with the necessary knowledge and skills to implement the Safeguarding Policy:

- ✚ POH's induction programme for all new employees covers the Child Safeguarding Policy
- ✚ All employees and representatives receive information on the relevance and impact of the Child Safeguarding Policy and accompanying guidance documents on their work;
- ✚ All visitors receive the Summary Policy Statement for Visitors to POH Offices and Programmes which is an annex to the Safeguarding Policy for International Programmes.
- ✚ Child Safeguarding Focal Persons and those involved in responding to accusations or incidents of child abuse will receive specialized training on their roles and responsibilities;
- ✚ POH's Stakeholder Accountability Framework highlights child safeguarding as well as other commitments in relation to how we intend to be accountable to all stakeholders;
- ✚ Additional guidance on programmes where there are increased risks, such as humanitarian crises, is provided in the Humanitarian Protection Policy and Handbook;
- ✚ Information and communication strategies for programme implementation are being developed to provide all the necessary information for programme participants about who POH and partners are, what we do, what to expect from us, how to raise a complaint and details of the programme in the relevant area.
- ✚ Communication materials about the Child Safeguarding Policy in POH offices, such as posters, will contain the following information: the child safeguarding message, a summary of the code of conduct or behavior to be expected from POH staff or representatives and how to make a complaint about exploitation and abuse.
- ✚ Guides and promotional material will be available in three languages: English, Spanish and French;
- ✚ All relevant documentation for the Child Safeguarding Policy, accompanying guides and forms will be accessible on POH's Yammer platform.

3.4 Risk Assessment and Safe Programming

Child safeguarding considerations such as exploitation and abuse should be included in all risk assessments and programme cycle management stages to ensure that all activities are conducted in a safe and dignified manner.

Further details of risk assessment and safe programming considerations can be found in the accompanying employee and partner guides. The Humanitarian Protection Policy and Handbook also highlights safe programming and protection mainstreaming in Humanitarian Programmes.

3.5 Special Considerations for Recording Stories and Images

All programme visits where it is intended to collect stories or record images (photographic/film or other) of programme participants should be arranged in advance through partner organisations. The partner organisation must accompany any such visit and an interpreter should be provided if necessary. The purpose and reason for the visit should be fully explained to the programme participants and agreed with them in advance. Consent should be sought from the programme participants for the use of their story and images; where appropriate, this consent should be written. In particular, before children are photographed or interviewed, the written permission of the parent/guardian must be attained. Following the visit a copy of the article / story and photographs should be sent to the programme participants through the partner organisation or on a follow-up visit.

POH applies the Dóchas Code of Conduct on Images and Messages (<http://www.dochas.ie/code/>) regarding the use of images (photographic/film or other) and information about POH's work and participants. The following guidelines should be adhered to:

- ✚ Ask the participant's parent's/guardian's permission to take the photograph/image
- ✚ Individuals must be appropriately dressed according to their choice and POH of origin
- ✚ Any complaints or concerns about inappropriate or intrusive images should be reported and recorded.
- ✚ In countries where children wear few items of clothing be particularly careful about the images chosen
- ✚ He recorded images should focus on an activity and, where possible, feature groups of children rather than individuals.
- ✚ Make sure that photographers and filmmakers are not allowed to spend time with or have access to children without supervision.

When publishing images:

- ✚ Try to use images that represent a broad range of people, gender, age groups, abilities and ethnic groups.
- ✚ Only use first names of children; be careful not to reveal too much detail about where children live, their school or their hobbies.
- ✚ Wherever possible, get adult / parent / guardian's consent, preferably written, to use images and inform them of the purpose, where and how the images will be used.
- ✚ Seek advice about publishing images on a website and always ensure time is allowed to edit images before they are uploaded.

3.6 Partner Selection and Support

POH takes appropriate steps when selecting and working with partners to ensure that there is a shared commitment to implement minimum safeguarding standards and that the organisation takes appropriate measures to uphold these standards. One of the Minimum Requirements for partnership funding, reproduced below, is that the partner organisation have in place, or is committed to producing within a specified period of time, a policy for child protecting in its activities.

'The partner organisation has a policy or a statement of commitment regarding the safeguarding of programme participants (including children), staff, volunteers and other third parties working on their behalf against any form of exploitation or abuse'.

How POH works with and supports partners in implementing these standards is outlined in the accompanying partner guide.

3.7 Contractual Agreements

POH employees and Consultants:

All people who are contracted to work with or for POH are required to understand and sign a policy declaration for this policy and POH's Global Code of Conduct (see Annex B) and complete a Self-Declaration Form about previous convictions (see Annex C), which form part of the terms and conditions of the contract. Failure to comply with this policy by a POH employee may lead to corrective action being taken under POH's Disciplinary Procedures. Failure to comply with this policy by a POH representative may lead to termination of a contract.

Official visitors:

Visitors to POH's programmes e.g., supporters, volunteers, donors or journalists are expected to uphold POH's child safeguarding standards. All visitors are required to be familiar with those standards in advance.

Partner organisations:

POH's minimum requirements to meet standards of safeguarding best practice form part of all grant agreements with partners. Decisions on funding a partner organisation and continuing relationships with partners, are dependent on adherence to safeguarding standards as contained in this policy and POH's

Grant Agreements.

4 REPORTING, RESPONDING AND MONITORING

4.1 Roles and Responsibilities

All involved in POH's work have a shared responsibility to recognise, report and respond to exploitation and abuse. How responsibility is incorporated into roles can vary depending on the size of the POH office and number of staff involved. The table below gives an overview of the key responsibilities, all of which are expanded on in the employee guide.

Role	Responsibility
All employees & representatives	To ensure that the Policy on Child Safeguarding and Protection in Internal Programmes is implemented and that safeguarding best practice in terms of prevention and response is incorporated into their work.
All Managers	To ensure that staff are supported and systems and procedures exist to implement and monitor safeguarding standards.
Human Resources and any staff involved in recruitment	To ensure that the recruitment of all POH employees and representatives is in line with the current Recruitment Procedures and that all new recruits understand and sign up to the Policy as part of induction.
Child Safeguarding Focal Person (SFP)	To promote awareness and good practice at a POH level in preventing exploitation and abuse of children perpetrated by POH employees, volunteers, consultants, partners or other representatives in the course of their work and to be first point of contact in relation to safeguarding issues. NB: The responsibility to prevent and respond to exploitation and abuse is shared. It is incorrect to perceive that the person named as Safeguarding Focal Point is the only person with responsibility to implement standards and safeguard children.
POH Director (CD)	Ensure that the POH office has systems and procedures in place which are in line with the Policy to prevent and respond to issues or complaints as they arise, including those which need to be escalated to the Chief Safeguarding Officer.
Head of Region/Location	To support the POH Directors/Programme Managers within their region to develop and implement safeguarding systems and procedures as well as deal with issues/complaints where relevant (especially where an allegation is made against a POH Director).
Head Safeguarding Manager	To drive the implementation of Safeguarding and Protection policy and practice throughout the organisation. Act as Advisor for all staff on all aspects of safeguarding.
Safeguarding Officer or Human Resource Office	To manage issues that are escalated to Head Office and ensure that agreed response procedures are followed.
Safeguarding Investigations Oversight Team	A team of senior staff members who support the Safeguarding Manager in the Management and preliminary Investigation of a sensitive safeguarding issue.

Executive Leadership Team (ELT) or high authority	To keep oversight and monitor the implementation of this policy while supporting the development of systems and procedures to meet safeguarding standards.
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4.2 Recognizing Exploitation & Abuse

It is crucial that all involved in implementing POH programmes recognises that exploitation and abuse of children in any form whether physical, sexual, and emotional or neglect is unacceptable and will be acted upon once we are aware of it. All employees and representatives are expected to listen to and consider whatever information programme participants or partners may share with us.

4.3 Duty to Report

All POH employees and representatives have a mandatory duty to report any suspected incident of exploitation or abuse of a child to the Child Safeguarding Focal Person (CSFP) and/or the POH Director (CD). Failure to report such matters may result in disciplinary action.

It should be noted that abuse may be current, recent or historical. There are no time constraints for reporting and taking action within the remit of this procedure, although POH encourages that reports be made as soon as knowledge, or suspicion, of an act of exploitation or abuse occurs

POH is committed to ensuring that adherence to confidentiality, in the management of complaints and allegations of exploitation and abuse, is strictly maintained.

All reports received by the SFP/CD need to be logged and documented in a safe and confidential manner. The person who first receives the information and/or complaint must complete the incident report form attached (see annex D) and submit as soon as possible to the Safeguarding Focal Person or POH Director. The accurate and detailed recording of such information is important in facilitating any assessment or further investigation into the incident. This includes, but is not limited to: dates, times, names, locations, context, any noticeable warning signs. Such information must be reported to the Child Safeguarding Focal Person and/or the POH Director as soon as possible. The POH Director will decide if the matter needs to be reported to the Chief Safeguarding Officer. It should be noted that failure on the part of a POH staff member to report an incident or a concern could result in sanctions, including dismissal, being applied. Third parties such as visitors or consultants are equally obliged to report anything of concern that comes to their knowledge.

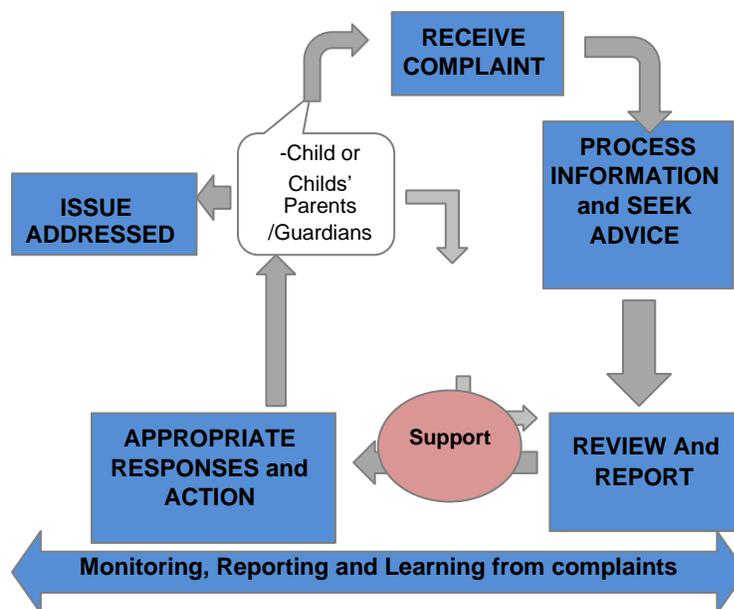
POH will endeavor to protect all individuals in reporting, provided the allegations are made reasonably and in good faith, in line with POH's Whistle Blowing Policy. Malicious complaints⁴ made against an individual, if these are proven, will result in appropriate corrective action under the Disciplinary Procedure up to and including dismissal.

⁴ The term malicious implies the conscious misuse of the system to harm somebody. A false complaint can be based on a misunderstanding and be of good faith by the complainant (whistle-blowing).

4.4 Responding to Reports or Allegations

POH will take whatever action is appropriate, necessary and possible, without risk of further harm to any individual and to ensure the safety of those involved. Each case will be considered individually and in accordance with national legal or other expert advice⁵. POH will follow best practice as has been documented and agreed for each of the respective countries in which it operates.

POH's overall response procedures for handling complaints⁶ received regarding its International Programmes is outlined in the graphic below. The POH Director is responsible for ensuring that the process is followed to a conclusion.



4.5 Guidance for field staff who receive a Complaint

All POH employees, representatives and official visitors have a **duty to report** any suspected incident of exploitation or abuse of an individual(s) immediately. Reports may relate to, but not be limited to: physical abuse, emotional abuse, exploitation, sexual exploitation and abuse or neglect.

⁵ All POH Offices have access to sound legal advice on an ongoing basis as required.

⁶ The word “complaint” is used here to refer to a report relating to a concern, a suspicion, a disclosure or allegation of child abuse that has been received by a POH office

It is not, however, the role of an individual staff member to investigate beyond the need to ensure that any report of an incident is accurate and is sufficiently detailed to be the basis for a decision regarding next steps to be taken.

Actions to be taken when a concern, suspicion, disclosure or allegation of child abuse is received:

- ✚ Respond immediately to any concern, suspicion, disclosure or allegation of child abuse
- ✚ Refer all information to the CSFP/CD as soon as possible
- ✚ The CSFP will assess the information and will follow up the matter with the POH Director.
- ✚ Wherever possible take notes, if not immediately as soon as possible, but not later than the end of that day
- ✚ Record all information on the POH child protection form (see Annex D). This should be signed and dated by the author.
- ✚ Include all of the details, even those which may not appear important at the time
- ✚ The CSFP will compile a child protection case file and will store all original copies of information in a safe and secure location
- ✚ Assess the risk to the child/children in question and if you deem it to be urgent, check that the CSFP has addressed the matter with the urgency you believe it deserves. Check at a minimum that the POH Director has been informed.
- ✚ Maintain professional confidentiality at all times.

How to respond to a person bringing a report on possible abuse or exploitation

- Receive: Listen, believe
- Reassure: Make no promises, but communicate that what is being reported is not the fault of the child. Communicate no judgment.
- React: Be non-intrusive, ask open questions, remain calm
- Record: Contemporaneous notes (observable /verifiable facts)
- Remember: The child safeguarding guidelines (and training you have received)

4.6 Monitoring of Child Protection Systems

It is important that compliance with this policy and the implementation of safeguarding standards is monitored on an ongoing basis. The following procedures should be observed as a minimum:

- ✚ All reports will be logged and stored in a secure location e.g. locked cabinet/drawer with restricted access, password protected files accessed by CDs/HR.
- ✚ Review of safeguarding will form part of POH's Internal Audit process

- ✚ POH will regularly monitor reports and the types of complaints received regarding safeguarding of programme participants and partners through the Executive Leadership Team.
- ✚ An Annual Statement on safeguarding, highlighting key issues will be presented to POH’s Board of Directors and Trustees and referred to in POH’s Annual Report as appropriate.
- ✚ POH’s policy is reviewed and approved by National Board for Safeguarding Children in the Catholic Church.
- ✚ POH’s Child Safeguarding Policy in International Programmes will approved by POH’s Senior Management Team and will be reviewed every three years.

Annex A: Declaration Form

The following declaration must be signed by all POH employees based in field offices, or in Irish offices when travelling to or visiting POH field offices, and all representatives working directly with or on behalf of POH field offices except Partner Organisations. This forms part of the terms and conditions of all contractual agreements with anyone associated with the implementation of POH’s work field offices.

Please complete the following declaration and return to your POH Director or HR Representative.

I have read and fully understand the following:

- ✚ ***POH’s Child Safeguarding Policy - Internal Programmes***
- ✚ ***POH’s Global Code of Conduct***

I agree to accept and apply the above Child Safeguarding Policy and Code of Conduct in their entirety.

Signed:

Name in caps:

Title:

Date:

For HR Only

Received by: _____

Received on: _____

Annex B: Self-Declaration Form

In order to comply with POH's Child Safeguarding Policy - International Programmes, this form must be completed and signed by all employees, representatives and third parties working with programme participants at the time of recruitment and return to your POH Director or HR Representative.

Full Name (print): _____

Address (print): _____

Date of Birth: _____ **Place of Birth:** _____

1. Do you have any prosecutions pending or have you ever been charged or convicted of a criminal offence relating to the exploitation or abuse of a child or adult.

Yes No

If yes, please state below the nature and date(s) of the offence(s)

Date of offence: _____

Nature of offence: _____

2. Have you ever been the subject of disciplinary procedures, or have left or been asked to leave employment or voluntary activity due to inappropriate behavior towards children? (Please tick)

Yes No If yes, please give

Details including date(s) below:

Name of Employer: _____ Date of incident(s): _____

Nature of incident(s)/inappropriate behavior: _____ Declaration:

I understand that, if it is found that I have withheld information or included any false or misleading information above, I may be removed from my post whether paid or voluntary, without notice. I understand that POH will keep this information securely in accordance with Data Protection legislation. I hereby declare the information I have provided above is accurate.

Signed: _____ Date: _____

For HR Only

Received by: _____

Received on: _____

Annex C: Summary Statement

Name of Visitor:	POH Visiting:
POH Staff Liaison:	Date Received:

Child Safeguarding Policy - Internal Programmes

Summary Policy Statement for Visitors to POH Offices and Programmes

All individuals have the right to life with dignity and to absolute freedom from exploitation and abuse. Underpinned by POH’s organizational value of accountability, it is our policy to safeguard all individuals involved in POH’s work against risks of exploitation and abuse. POH will not tolerate exploitative or abusive behavior by anyone associated with the implementation of POH’s work and highlights this as a core commitment in the organisation’s Stakeholder Accountability Framework. POH recognises that individuals, women, men, girls and boys in certain contexts may be considered more vulnerable to exploitation and abuse than others, and we make every effort to eliminate such risks from our programmes.

Child Safeguarding Policy - International Programmes applies to: all POH employees travelling to or visiting field offices or who are based in the field offices. It also applies to representatives working under a contractual arrangement with or on behalf of POH, e.g., consultants and other third parties. Any other official visitors to POH’s programme locations and offices, including supporters, volunteers, donors or journalists, will also receive this Summary Policy Statement and are expected to uphold the standards contained herein.

An integral component of the Policy is **POH’s Code of Conduct** which forms part of any contractual terms and conditions of all POH employees and representatives contracted to work with or for POH field offices. Special considerations are made to safeguard children and to prevent sexual exploitation and abuse of any individual. In line with this, all commit:

- # To work actively to promote the best interests of children and adults
- # To act in line with POH’s Safeguarding Policies and relevant guides
- # To encourage children and adults to feel comfortable enough to point out attitudes and behavior they do not like and make a complaint where necessary
- # To recognise that caution is required in one-to-one situations, particularly in sensitive situations such as dealing with programme participants including children who may be upset or traumatized

POH has a zero-tolerance stance on exploitative and abusive relationships, including:

- # Any sexual activity with children under the age of 18, regardless of the age of consent locally (mistaken belief of age being no defense)
- # Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior. This includes exchange of assistance that is due to partners and programme participants.

It is expected that visitors of POH adhere to these commitments when interacting with children.

Annex D: Incident Report Form

This form should be completed if you have a suspicion or concern regarding an abuse or exploitation of a child who is participating or benefiting from a POH funded programme/project or in the event of an alleged breach of POH’s Safeguarding Policy - International Programmes or Code of Conduct. The completed form should be given to the POH Director or Safeguarding Focal Point.

Section 1:

About the disclosure/concern

Date of disclosure/concern: _____

Time of disclosure/concern: _____

How was the information received? (Attach any written information to this form) *Please circle:*

Telephone Letter Email In person

Details of person making disclosure/raising concern

Name (please print) _____

Address _____

Tel _____ Mobile _____

Email (please print) _____

Relationship to child _____

Details of child

Name _____ DOB _____

Address _____

Gender: _____ Ethnic Origin _____

Language (is interpreter/signer needed) Yes No Any Disability _____

School (if applicable) _____

Partner Organisation details (if relevant)

Name _____

Address (if different from above) _____

Tel _____ Mobile _____

Are they aware of the allegation, suspicion or complaint?

Yes No

Details of parent/care (where appropriate)

Name _____

Address (if different from above) _____

Tel _____ Mobile _____

Are they aware of the allegation, suspicion or complaint?

Yes No

Details of alleged perpetrator

Name _____

Address _____

Relationship to child or adult (if applicable) _____

Occupation _____

Details of concern, allegation or complaint

(Include dates/times, location of incident(s) occurred, witnesses if known. Include programme participant's words where possible. Does the child or adult know this concern is being raised?)

Section 2: To be completed by the POH Director.

Action taken:

Has the matter been referred to civil /church / community authorities?

Yes No

If no explain _____

If yes

Date of referral _____ Time _____

Who was it referred to?

Name _____ Designation _____

Address _____

Tel _____ email _____

Next Steps

What actions were agreed and by whom when the matter was referred to civil / church / community authority?

Are there any immediate protection concerns? If so please record what they are and state what actions have been taken by whom to address them?

Safeguarding Focal Person

Name _____ **Date:** _____

POH Director Signature: _____ **Date:** _____

Approved by the Board of Directors

Signed:**On behalf of BoD**

Names:

Date:

Annex E: List of Relevant and Related Policy and Procedural Documents

- ❖ POH Child Safeguarding Policy - International Programmes – Staff Guide: This is an integral part of the policy, providing information and guidance to assist employees to put the commitments outlined within this policy into practice
- ❖ POH Child Safeguarding Policy - International Programmes – Partner Guide: a specific guide outlining minimum requirements and contractual obligations for partner organisations
- ❖ POH Child Safeguarding Policy – Ireland/Northern Ireland: this is for employees based in Irish Offices but is used for reference
- ❖ POH Stakeholder Accountability Framework
- ❖ POH Global Code of Conduct
- ❖ Recruitment Policy & Procedures
- ❖ Dignity at Work Policy
- ❖ Discipline and Grievance Procedures
- ❖ Complaints Policy and Implementation Guidelines - International Programmes
- ❖ Investigation Procedures
- ❖ Whistle Blowing Policy
- ❖ Fraud, Bribery and Corruption Policy
- ❖ Dóchas Guide to Conduct on Images and Media <http://www.dochas.ie/code/>
- ❖ Humanitarian Protection Policy & Handbook
- ❖ Gender Mainstreaming Resource Pack
- ❖ Universal Declaration of Human Rights (UDHR),
- ❖ UN Convention on the Rights of the Child (UNCRC, 1989),

Annex F: Some examples of unacceptable behavior in relation to working with children

- ❖ Hit or otherwise physically assault or physically abuse children.
- ❖ Engage in sexual activity or have a sexual relationship with anyone under the age of 18 years regardless of the age of majority/consent or custom locally. Mistaken belief in the age of a child is not a defense.
- ❖ Develop relationships with children which could in any way be deemed exploitative or abusive.
- ❖ Act in ways that may be abusive in any way or may place a child at risk of abuse.
- ❖ Use language, make suggestions or offer advice which is inappropriate, offensive or abusive.
- ❖ Behave physically in a manner which is inappropriate or sexually provocative.
- ❖ Have a child/children with whom they are working to stay overnight at their home unsupervised unless exceptional circumstances apply and previous permission has been obtained from and their line manager.
- ❖ Sleep in the same bed as a child with whom they are working.
- ❖ Sleep in the same room as a child with whom they are working unless exceptional circumstances apply and previous permission has been obtained from the child (ren)’s parents/guardians and the staff member’s line manager.
- ❖ Do things for children of a personal nature that they can do themselves.
- ❖ Condone, or participate in, behavior towards children which is illegal, unsafe or abusive.

- ❖ Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
- ❖ Discriminate against, show unfair differential treatment or favor to particular children to the exclusion of others.
- ❖ Spend excessive time alone with children away from others in a manner which could be interpreted as inappropriate.
- ❖ Expose a child to inappropriate images, films and websites including pornography and extreme violence.
- ❖ Place themselves in a position where they are made vulnerable to allegations of misconduct.