

CHILD SAFEGUARDING POLICY (CSP)

INTRODUCTION

Protection of our beneficiaries, including children, their families/caregivers and communities is of utmost importance.

The need for this Policy flows from a recognition that our work often puts UPP personnel in positions of power over the communities we work with, while also recognizing the potential outcome in exploitation throughout our work.

We recognize that children and adolescents are particularly vulnerable to power differential towards adults in positions of care, delivering service or perceived as authority. We have an obligation to use our factual power respectfully and must not abuse the influence we have over the lives and well-being of the children we serve and others in the communities where UPP works. We recognize that any such outcomes will certainly undermine the credibility of our work and the trust we build with those we intend to serve, as per UPP Staff Handbook on Standard of Conduct, paragraph 4.3.

Un Ponte Per is committed to upholding human rights of the child – that is any person below the age of 18.

With its community-based, bottom-up approach, UPP aims to include the voices of all those we serve, including children, through participation and empowerment. Our commitment includes efforts geared at preventing, mitigating and addressing both intentional and unintended consequences of aid and development programmes (do no harm) on children we encounter in our missions and offices.

In following a Child-rights based approach UPP repudiates all forms of discrimination, violence and any form of exploitation and abuse of children, the worst types of labour, sexual exploitation and abuse and is committed to making all efforts geared towards ensuring programmes are child safe.

Humanitarian, development and peacebuilding operators are expected to uphold the highest standards in personal and professional conduct at all times.

SCOPE OF THE POLICY

The scope of this policy is to guarantee that efforts are carried out for safe programmes so that every child is protected from all forms of violation, injury, physical, psychological and sexual abuse, and exploitation.

This means we are responsible to ensure that staff, programmes and operations do not directly or indirectly harm children, and do not expose them to the risk of harm and abuse.¹

Such forms of violations by UPP and implementing partner staff (including employee/consultant or associates), Board members, volunteers, external contractors or other persons under UPP responsibility, including visitors to UPP project sites locations is a **gross misconduct** and will result in disciplinary action, including immediate termination of employment and referral for criminal prosecution, where appropriate.

¹ Keeping Children Safe. Child Safeguarding Standards and how to implement them. 2014.



UPP recognizes the fundamental duty of care and accountability towards the children we come into contact in our operations.

UPP is committed to upholding the rights of children and believe all children have a right to be free from all forms of discrimination, violation, abuse, violence, neglect and exploitation and to promoting their well-being, and development.

This includes children who may have a higher vulnerability to abuse, exploitation or other harm due to the characteristics of the child or their parents/caregivers or their membership in any community. This includes age, gender, gender identity, sexual orientation, ethnic origin, religion, family status (including unaccompanied, separated and orphaned), disability, social or economic status, perceived political affiliation or affiliation with armed forces or armed groups, or due to their displaced or refugee status. UPP is also committed to protecting children from injury or other harm caused by the way we in which the organization, designs, plans, implements, monitors and hands-over its activities.

In our mission to safeguard children we are guided by the United Nations Convention on the Rights of the Child (UNCRC, 1989). Moreover, as also stated in Policy on PSEA (Annex 7) our Safeguarding approach is in line with the Inter-Agency Standing Committee (IASC) six core principles (2002) incorporated into the UN Secretary General's Bulletin on 'Special Measures for Protection from Sexual Exploitation and Sexual Abuse' (2003) 2.

This policy has been adapted from the Inter-Agency Child Safeguarding Policy developed by the Iraq Child Protection Sub-Cluster, adopted by UPP in November 2019.

We take a zero tolerance approach to all abuse and exploitation against children and all those who fall under the scope of this policy are prohibited from taking part in any exploitation or abuse of children.

Safeguarding and promoting children's wellbeing at UPP is everyone's responsibility.

UPP stands for the following principles:

- Sexual exploitation and abuse on children by UPP personnel and associates constitute acts of gross misconduct and are therefore grounds for immediate termination of employment or membership.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. **Mistaken belief regarding the age of a child is not a defence**.³
- Non-discrimination and do no harm: All children have rights to be safe from harm;
- **Responsibility:** Everyone within the scope of this Policy has a responsibility to the safeguarding of children with whom we work, are in contact with, or who are affected by our activities and operations;
- Best Interest of the Child: All actions on child safeguarding are taken in the best interest of the child
- child's will always included- which is paramount;4
- **Confidentiality**: only essential information will be collected and shared only among those who 'need to-know';
- **Accountability:** all children and their parents/caregivers have right to be informed about their rights and have their voices heard and respected;
- When working with partners, UPP has a responsibility to help them to meet minimum requirements on child safeguarding.

² Secretary General's Bulletin Special Measures for Protection from Sexual Exploitation and Sexual Abuse 2003 ST/SGB/2003/13.

³ From UPP, Annex 7 – Policy on PSEA based on Secretary General's Bulletin Special Measures for Protection from Sexual Exploitation and Sexual Abuse 2003 ST/SGB/2003/13.



INTERACTIONS WITH INTERNAL REGULATIONS

This Policy and Standard Operating Procedures (SOPs) are in no way intended to override internal policies set.

Rather, they are procedures that arise from and supplement internal policies set.

While this will serve to guide articulation of general provisions in the specific field of Child Safeguarding, it must be complemented by Standard of Conduct (CoC), including investigations and staff training. In particular, the CSP should be seen as complementary to Policies on Integrity, HR, Communication and Fundraising, Data Protection, Procurement and Logistics, Safety and Security and Project Cycle Management (PCM).

Child Safeguarding should permeate each level of the humanitarian infrastructure for successful prevention and addressing.

These Policy and SOPs are not intended to be a stand-alone resource. They aim to clarify how internal functions can cooperate in a joint complaint mechanism that is in line with the other policies and procedures. How a complaints mechanism is structured at the field level, however, might vary as certain aspects of a complaint mechanism must be tailored to the local context in order to be safe and effective. Therefore, field teams headed by the Head of Mission (HoM) will need to develop country-specific Terms of Reference, and potentially, slightly modified SOPs to reflect the tailored approach, where necessary.

APPLICATION OF THE POLICY

This policy applies to:

Personnel/Staff: For this policy purposes, "personnel" and "staff" are used interchangeably and they indicate any person who works for or represents the organization, whether or not s/he is compensated monetarily (volunteers, civil servants, civil peace corps, etc.) and regardless of the type or duration of their contract.

Association Members (Board included): at any relevant level should be aware and respect this policy;

Visitors and members of Delegations: anyone that comes into contact with children and their communities at UPP programmes or offices, regardless of the amount of time, should be aware and respect this policy. This may include donors, journalists, video-makers among others.

Partners: Entities or groups that operate with UPP in common interventions. Staff of, and all those employed by, or Board members of an implementing partner are 'humanitarian aid workers' for the purposes of this Policy and they fall within the Partners' internal policies as acknowledged and investigated by UPP across the due diligence process to select Partners. However, UPP has a responsibility to help implementing partners meet minimum requirements on Child Safeguarding.

Abuse, neglect and exploitation of a child by any other person/entity (e.g. a community member or other NGOs' staff/volunteer/member etc.) is not included in the scope of this Policy but for mandatory reporting.

DEFINITIONS

Child: any person under the age of 18, regardless of local 'majority' legal definition (Art.1 of United Nations Convention on the Rights of the Child – UN CRC).



Best interests of the child: principle that encompasses a child's physical and emotional safety (their well-being) as well as their right to positive development (Art. 3 UN CRC). This principle is the basis for all decisions and actions taken, and for the way in which service providers interact with children and their families/caregivers.

Child Safeguarding: an accountability system made up of policies, procedures and actions that we take to ensure our organisation is safe for children. The policies and procedures put in place aim to both prevent and address any harm caused to children because of their interaction with our organisation.

Child Protection: the prevention of and response to abuse, neglect, exploitation and violence against children.

Case Management: approach made of systematic and timely direct support and referrals for addressing the needs of an individual who is at risk of harm or has been harmed. CM in the field of Child Protection provides individualised, coordinated, holistic, multi-sectoral support for complex and often connected child protection concerns.

Vulnerability: Physical, social, economic and environmental factors that increase the susceptibility of a community or individuals to difficulties and hazards and that put them at risk of loss, damage, insecurity, suffering and death.

Harm: Refers to injury, pain, suffering or trauma of a physical, emotional or developmental nature. Harm caused to children may be visible or invisible and may be intended or unintended.

Child Abuse: involves the abuse of children's rights and includes all forms of violence against children: physical, emotional and sexual abuse, neglect, family violence, sexual exploitation, abduction and trafficking for sexual and/or modern slavery purposes, harmful traditional practices, involvement of a child in online child sexual exploitation and child labour.

Exploitation: when an individual in a position of power and/or trust takes or attempts to take advantage of another person for their own personal benefit, advantage, gratification, or profit.

Sexual Exploitation: any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Child Sexual Abuse: any form of sexual activity with a child by an adult or by another child who has power over the child. Sexual abuse does not necessarily involves physical contact. It exploits the child's power differential and violates the child's integrity, despite any eventual expressed consent to it or absence of objection. Forcing a child to witness rape and/or other acts of sexual violence, forcing children to watch pornography or show their private parts, showing a child private parts etc are also acts of sexual abuse.

Violence: "all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse" - Article 19 of the UN CRC.

Emotional maltreatment: Maltreatment that causes harm to the psychological or emotional well-being of the child. Also called psychological maltreatment.



Child labour: all children below 12 years of age directly involved in any economic activity or children below the minimum age for work (between 14 and 16) engaged in more than light work. Child labour includes work that is mentally, physically, socially or morally dangerous and harmful to children; and work that interferes with their schooling (ILO Minimum Age Convention No.138).

Beneficiary: A person who receives assistance as part of either humanitarian aid, development or peacebuilding and social cohesion.

Complainant: A person who brings an allegation of exploitation and abuse or other breach of the CSP either proven or not, in accordance with UPP Staff Handbook procedures at paragraph 4.7.1. This person may be whoever is aware of, gets to know about, hears, is told about the wrongdoing.

Subject of the Complaint: Once a complaint has been filed, the alleged perpetrator of any breach of the CSP is referred to under these terms.

Child Survivor/Offended Child: a person who has experienced any form of child exploitation, abuse, violence, harm, injury perpetrated against him/her or an attempt to. For the purposes of this Policy, persons who report having themselves experienced or those who are subject of complaint of any form of child exploitation, abuse, violence, injury, harm are treated as survivors/victims/offended party for the purposes of security and needs assessment.

Informed Assent: the expressed willingness to participate in services, for children under 15 years, requires the same sharing of information (in a child-friendly format) on services and potential risks.

Informed Consent: the voluntary agreement of an individual who has the capacity to understand, and who exercises free choice to receive services (for children and adults aged 15+ only), requires caseworkers to share information on services and potential risks.

RESPONSIBILITIES AND COMMITMENTS:

A. All Directors, Senior Managers at HQ and at Country-level (Executive Director, Heads of Departments, HR Manager at HQ, Country Representatives and Heads of Mission) **shall:**

- 1. Remain responsible and accountable for the Policy and its progressive implementation overall.
- 2. Follow-up timely on implementation of the Policy for the respective scope.
- 3. Ensure the resources needed to implement the Policy are allocated.
- 4. Lead on the monitoring and review of the implementation.
- **B. All line managers and supervisors** (Desk Officers, Heads of Office and Project Managers) must ensure that all UPP personnel understand and comply with this Policy and its Principles. To aid in implementing this Policy, UPP line managers and supervisors commit to:
 - 1. Ensure all staff at UPP is aware of Child Safeguarding Policy contents and UPP reporting system, by incorporating our standards on Child Safeguarding in orientation/induction materials and training courses for our personnel.
 - 2. In compliance with applicable laws and to the best of our abilities, prevent perpetrators of any form of child violence, exploitation and abuse from being hired or re-deployed by UPP. This includes use of background and criminal reference checks as per the Staff Handbook on the recruitment and selection process.



- 3. Ensure resources allocation for child safeguarding awareness raising (for staff and communities) and induction and training (for staff)
- 4. Incorporate appropriate job responsibilities (such as staff training, complaints and response mechanisms) in specific staff positions to support and ensure effective implementation of this and the other Policies. These may vary according to the level of responsibility and exposure to children in the field for CSP, but includes all staff behaviour with children both in and out of the workplace.
- 5. Address reports of child sexual exploitation, abuse, violence, harm and injury in-line with internal reporting guidelines (Staff Handbook, paragraph 4.7.1).
- 6. Ensure that when working in consortium or through sub-awarding/contracting, partners are supported to improve their child safeguarding measures and follow our Policy if required.
- 7. Establish and ensure that complaint mechanisms for reporting Child Safeguarding breaches are accessible, particularly to participants of UPP programs, and that UPP focal points for receiving complaints (by UPP Complaint Policy and Staff Handbook) understand how to discharge their duties.
- 8. Take appropriate action to the best of our abilities to protect persons from retaliation (Whistleblowing Policy) when allegations of child violence, exploitation, abuse and other safeguarding concerns are made in good faith.
- g. Investigate allegations of Child Safeguarding concerns involving UPP personnel and associates in a timely and professional manner, and to the best of our ability encourage personnel to do the same as per UPP Staff Handbook and Policies. This includes that those in charge of the investigation use of appropriate interviewing practices with complainants and witnesses, particularly with children. Engage professional investigators as appropriate.
- 10. Take swift and appropriate action, including legal action, against UPP personnel who commit serious breaches which constitute gross misconduct or harm a child. This may include administrative or disciplinary action up to immediate dismissal and referral to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country.
- 11. Provide basic emergency assistance (medical, legal) and basic psychosocial support as appropriate and feasible to complainants of child sexual exploitation, abuse, violence, harm, injury.
- 12. Create and maintain mechanisms to systematically raise awareness among UPP personnel and associates and the communities we serve on measures taken to prevent and respond to child safeguarding breaches.
- 13. Ensure that when engaging in partnership, sub-grant or sub-recipient agreements, the agreements
- a) incorporate this Policy as an attachment in case the partners don't have one;
- b) expressly state that the failure of those entities or individuals, to investigate allegations on child safeguarding breaches, or to take corrective actions when breach has occurred, shall constitute grounds for termination such agreements on the part of UPP.
 - 14. Ensure high level oversight and information on CSP breach reports received and actions taken.

C. All Staff and Associates of the Organisation shall:

- 1. •Ensure they understand and comply with the Policy and Child Safeguarding Code of Conduct (appendix 1) at all times.
- 2. •Ensure they speak with their line manager immediately if their ability to abide by the Policy and/or Child Safeguarding Code of Conduct changes at any time after signature.



D. All visitors of the Organisation shall:

• Ensure they understand and comply with this Child Safeguarding Policy and the Child Safeguarding Code of Conduct (appendix 1) at all times.

E. All contractors, vendors and suppliers shall:

• Understand and comply with this Child Safeguarding Policy at all times as well as Good Business Regulation - CoC

STANDARD OF CONDUCT FOR CHILD SAFEGUARDING

These Standards apply to all UPP personnel and intend to provide an illustrative guide to make ethical decisions in their professional and personal lives. Any violation is serious concern and may result in disciplinary action, up to immediate dismissal, in accordance with disciplinary procedures of UPP as per UPP Staff Handbook at paragraph 4.7.

While UPP will not impose on its partners to necessarily adopt this, we are committed to raise awareness of partner personnel and provide capacity building to them (MoU clauses) with the aim of becoming fully engaged and committed to the Policy principles.

Specifically concerning Child Safeguarding each person within the scope of this Policy commits to undersigning and abiding by the Child Safeguarding Code of Conduct specified at **Appendix 1**.

REPORTING ON BREACHES AND MAKING A COMPLAINT

Anyone has the right to make a complaint about the behaviour of those associated with UPP and its programs including any inappropriate behaviour of other employees or volunteers using the Reporting and Internal Investigation system in **Staff Handbook at paragraph 4.7.1**. Any manager who suspects inappropriate behaviour should refer to the same process and seek advice immediately. Complaints from persons external to UPP will be dealt with under the Complaints Policy. We recommend that reports concerning a breach of Child Safeguarding Policy be made immediately (same day or within 24 hours). We recognise that this may not always be possible or likely with allegations of such a sensitive nature. An investigation can go ahead no matter how long ago an incident occurred (however, the sooner the better in order to swiftly respond and protect the child) and regardless whether the alleged child survivor/victim/offended wishes to take an active part.

INTERNAL INVESTIGATION

UPP has procedures for carrying out investigations into allegations in paragraphs 4.7.1 and 4.7.2 of the Staff Handbook.

Guidance and support to those managing investigations is essential and is available from HR Manager at HQ or Executive Director.

Any investigation on allegation of any breach of Child Safeguarding policy shall be notified to the **HR Manager at HQ** and to the **Executive Director**.

Investigations are an internal administrative process and would not therefore involve the police or judiciary. Investigations are carried out so that UPP can have the best information possible on which to base its decisions concerning staff conduct and consequences thereof. Please see **paragraphs 4.7.1 to 4.7.3 of the Staff Handbook**.

We will alert the appropriate authorities if, following an investigation, we judge that:

- A crime has taken place,
- Confidentiality and safety can be ensured,



- The child /survivor/offended and their caregiver(s) provide their consent/assent in line with the Best Interests of the child,
 and
- Those associated with the case will not be subject to abuse or violence.

Mandatory reporting (i.e. a legal requirement) always applies but when it puts at risk the life and/or the whereabouts of the child and/or the caregiver(s) upon material evidence and case review.

ASSISTANCE TO THE OFFENDED

The response to a child safeguarding report will depend on the nature of the concern or incident reported. This section particularly concerns serious child safeguarding concerns such as sexual abuse and exploitation, as well as other types of child abuse such as: **physical abuse**, **neglect**, **and emotional/psychological abuse**. In case of SEA case, please follow UPP Policy on SEA and Handling Allegations.

In responding to child survivor/victim/ offended child, ensure that:

- no further harm is done after a report is received;
- identified/reported risks to children being harmed are reduced to safe levels;
- -child and adolescent survivor/victim/offended receive the support they need as soon as possible.

Step 1: Stop any further harm. If an alleged wrongdoer/perpetrator still has access to children ensure that the contact is stopped. This may mean moving a staff member from the field to an office position for different tasks, or it might mean suspending them from duties while the process is followed.

Step 2: Children and their caregivers who have been in any way harmed by a breach in the CSP will receive immediate support as necessary at all levels (medical, psychological, security), in line with the Best Interest of the child, the wishes and needs of the offended and caregiver and to a level deemed acceptable to relevant professional staff.

Where UPP implements Protection and Child Protection programmes - in keeping with the principles of confidentiality, consent/assent and the best interest of the child – UPP dedicated personnel shall seek support through referral to services abiding by Child Protection Case Management SOPs .

Step 3: Ensure the child and their family/caregiver(s) are told how they will be kept informed about any enquiry/investigation that will go ahead, and ensure a timely response at each stage.

DEBRIEFING and FOLLOW-UP

All staff involved with a CPS breach allegation, and in particular, those involving any form of abuse and exploitation of a child, may interact closely with people who are upset, distressed or angry.

As a result, they may feel the need for help or would like to talk things through with somebody appropriate.

UPP has an in-house counsellor available for all expatriate staff who wish to make use of this service. Country Director/Head of Mission could also consider whether there are appropriate support mechanisms available locally that might be accessible and acceptable to local staff in need.

CONSEQUENCES

Employees who contravene UPP's clearly stated expectations of their Child Safeguarding conduct will be subject to disciplinary action up to immediate dismissal. Volunteers and incentive workers will have their relationship with UPP terminated. Partners whose employees and Board members contravene the Child Safeguarding expectations and those expressed in partnership documentation must conduct appropriate investigations. Failure to do so will result in funding being withdrawn and their relationship with UPP will be terminated.



Contractors/Consultants who contravene our expectations will have their contract ended and they will be blacklisted for up to three years.

As outlined above (in Investigations), the appropriate authorities might become involved under certain circumstances.

LEARNING

HQ Human Resources Manager and Executive Director keep a register from which analysis for trends in behaviour, investigation outcomes and problems will be regularly analysed. Regular reporting of incidents to them is obligatory.

Developed by Protection Desk officers for Iraq and NES based on adopted Child Safeguarding Inter-Agency Policy of Iraq Child Protection Sub-Cluster (fall 2019).

Approved and released by the Executive Director

Novella Mori

On the 15.12.2020



Appendix 1: Child Safeguarding Code of Conduct

This Code of Conduct is a mandatory requirement that all persons within its scope.

Any breach must be reported, even if you are unsure on the quality of the behaviour, upon procedures provided in UPP Staff Handbook paragraph 4.7.

Always consider the best interests of the child paramount.

I will:

- a) Remain aware of the power imbalance between adults and children and behave in a child friendly way that sets a positive example for children at all times.
- b) Treat all children equally and with respect regardless of any individual characteristics.
- c) Do everything in my control to minimise the risk of children being harmed during the planning, implementation and evaluation of work activities. I will contribute to a safe environment for children.
- d) Immediately report any concerns or incidents of sexual abuse, exploitation or violence against a child that I become aware of.
- e) Ask for support if I have concerns about, or do not fully understand the Child Safeguarding Policy.
- f) After I have signed the Code of Conduct I will inform if there is any situation where I am unsure or it is not clear to me if it is potentially a breach of this Code of Conduct.
- g) Inform my line manager at UPP of any charges or convictions relating to child abuse or exploitation that I am subject to that occur before or during my association with my organisation. This includes charges or convictions that occur under traditional law.
- h) Use positive and non-violent methods at all times when interacting and working with children.
- i) Empower children and their families through providing them with information on their rights and how to report concerns or incidents of abuse.
- j) Whenever possible ensure that there is another adult with me when I am working with individual children, or that I can clearly be seen by other staff or adults (two-adult rule or buddy system)
- k) Obtain informed consent from children and their caregivers before taking their photograph, video or audio recording limited to professional reasons, and before using their photograph, video or audio file for professional reasons. Where possible I will obtain written consent, in line with UPP Data Protection Policy, Communication and Social Media Policy and guidelines.
- I) Promote children taking part in decisions that affect them, particularly concerning their safeguarding, and considering their age and maturity.
- m) Ensure that I treat confidential information about children and their families with respect, I will not share it with others either verbally, electronically, on paper or on social media, except if it is part of an approved organisational process or part of the case management service, and with informed consent from the child and their family.

I will NOT:

- a) engage in any sexual activity with a child below the age of 18, regardless of the age of sexual consent locally. **Mistaking a child's age is not a defence.**
- b) physically discipline a child at any time, including hitting, kicking, scratching, punching, and biting.
- c) develop relationships or display behaviour with children that may be perceived to be, or become, exploitative, abusive or inappropriate.
- d) get married to a child, regardless of the legal minimum age or any judicial consent that is given.
- e) initiate a relationship or sexual contact with anyone under the age of 18, irrespective of the national age of consent.



- f) engage in traditional practices that may be harmful to a child's healthy development.
- g) pay a child either money, or through food or other goods unless it is part of an agreed and approved program activity.
- h) act as a negotiator in or participate in the financial agreement process between a family where a child has been exposed to discrimination, violation, injury or abuse or sexual exploitation and a perpetrator
- i) withhold any basic care items from children such as water or food, as a way of disciplining them.
- j) act in a way that may humiliate, degrade, belittle or disempower children and cause them emotional harm.
- k) discriminate against or treat one child or a group of children favourably over another group that may result in exclusion or neglect of a child's or a group of children's needs.
- take photos or videos of children that portray them as passive victims, or when they are not appropriately dressed. Ensure that images or documentation of a child have been approved by the child and the parents/caregivers and, regardless, do not put the child at risk of any form of exploitation.
- m) take photos or videos of children that are for my personal use, or post pictures or videos of children on my personal social media channels.
- n) use photos or videos of children in professional communication who are particularly vulnerable to be identified even if their identity has been changed, for example children associated with armed groups, unaccompanied children, or children that have been abused or exploited in any way. Meaningful consent is always required prior to publishing the material, to ensure child and parents/caregivers understand the use, scope and platform where such imagery might be displayed.
- o) use language or behaviour in front of children that is inappropriate through being sexualised, abusive, derogatory or otherwise negative.
- p) assist a child with any aspect of their personal care (for example, taking them to the toilet, helping them wash) if they are capable of doing this themselves.
- q) invite a beneficiary/client child or their family to my home or another private abode unless it is an exceptional protection measure approved in writing by the Executive Director and my supervisors (at least other two).
- r) transport a child alone unless it is an exceptional protection measure approved in writing by the Executive Director and my supervisors (at least two).
- s) sleep in the same bed or room as a child beneficiary unless it is an exceptional protection measure approved in writing by the Executive Director and my supervisors (at least two), and where another adult is present with me.
- t) introduce or encourage a child to engage in harmful or dangerous activities.
- u) work with children while I am under the influence of drugs or alcohol.
- v) develop, publish, watch or share child pornography though any source, or show material of a pornographic nature to children.
- w) share my personal email address, phone number or social media account details with children or their families, or request these details from children or their families, unless it is strictly for service provision. If needed I will only share my professional UPP email and/or UPP phone number, I will never share my personal social media account details.

Please note that

- the Child Safeguarding Code of Conduct is not exhaustive and therefore all signatories should apply the required good judgement in assessing behaviours and actions that may not be contributing to a safe environment for children.
- the Child Safeguarding Code of Conduct applies both at work and outside of work in your personal life



Appendix 2 - POLICY IMPLEMENTATION

We acknowledge the risk to children across our organisation's personnel, activities and operational procedures. We will progressively implement this Policy through taking action in the following areas as our minimum standards.

1. Job advertisement, recruitment and selection:

- **1.1** Job advertisements, job descriptions and terms of references clearly state the level of contact with/responsibility for children that the position requires.
- **1.2** Job advertisements highlight the need for successful candidates to undertake a formal criminal record check or to complete a self-declaration on any criminal convictions.
- **1.3** Where relevant, include child safeguarding commitment and responsibility statements in job advertisement, job description, terms of reference, employment contract and include child safeguarding questions in interviews.
- **1.4** Conduct reference checks before making employment offers. Include child safeguarding questions in these reference checks.

2. Child Safeguarding Induction and Training:

- **2.1** Obtain signature to the Child Safeguarding Code of Conduct (appendix 1) as part of the employment contract.
- **2.2** Induct all new staff on Child Safeguarding when they join the organisation. The length and comprehensiveness of the induction will vary according to the level of contact with children.
- **2.3** Train new staff with a key child safeguarding position (e.g. management, Child Safeguarding Focal Points), provide a refresher training after one year of the completion of training.
- **2.4** Support partners to implement Child Safeguarding measures and require them to follow our Policy if they do not have their own, where relevant.
- 2.5 Train our partners on our Child Safeguarding Policy and their responsibilities.

3. Child Safeguarding Awareness Raising:

- 3.1 Display the Child Safeguarding Policy in all of our offices and any infrastructure in the communities where children and their families come into contact with UPP. Display the Policy in the relevant language and in child friendly language.
- **3.2** Ensure children and their families are informed about how to report about concerns. Ensure that reporting mechanisms are in the appropriate language and are safe and accessible.
- 3.3 Include Child Safeguarding as a permanent agenda point in internal audit processes.

4. Media and Communications:

- **4.1** In line with UPP Communications and Social Media Policy, obtain informed consent (from the child's caregiver) and/or informed assent (from the child) before creating or using any visual, audio or written information about them for official communications.
- **4.2** Protect children's privacy by never disclosing their real name or location in official communications. Do not share any details about them that may make them traceable.
- **4.3** Regardless of the consent/assent, do not use children images that might damage their dignity or security.
- **4.4** Do not share or use children's or their families information (visual, audio, written) obtained through work activities on any personal social media accounts (for example, this includes Instagram, Facebook, SnapChat). This includes their names, photos, location or any details about them.
- **4.5** When contracting media partners to work with us ensure they have read, understood and signed the Child Safeguarding Policy.

5. Safe programme design and implementation:

- **5.1** Consider relevance and incidence of Child Safeguarding through every step of the program cycle, from designing a project, to implementing it and monitoring and evaluating it.
- **5.2** Ensure there are trained and qualified staff in positions working directly with children. Ensure that children are adequately supervised at all times.
- **5.3** Conduct risk assessments for projects directly involving children before the project starts. Ensure that mitigated risk levels are at a safe level before an activity goes ahead.
- **5.4** Include Child Safeguarding measures as an activity in projects where relevant, e.g. education and school projects.
- **5.5** Ensure that Child Safeguarding training needs are explicitly accounted for in project proposals.
- **5.6** Advocate for the resources needed to implement Child Safeguarding measures to be outlined explicitly in projects proposals and budgets.



6. Reporting

- **6.1** Alternative safe, accessible and child-friendly reporting mechanisms are established, where relevant, feasible and applicable.
- **6.2** Suspected harm caused to children by UPP staff or programmes is reported through UPP's internal reporting procedures. Harm suspected to have been caused by someone or something external to the organisation is also reported.
- **6.3** UPP must report serious Child Safeguarding concerns and incidents to donors and Task Forces as required in their partnership agreements. If a confirmed incident violates local law, survivor wishes and best interests of the child must be the primary consideration in decisions to report to authorities.

7. Addressing

- **7.1** All Child Safeguarding reports, whoever they come from (children, adults, organisation staff etc.) will be taken seriously and all gathered information treated confidentially.
- **7.2** The safety and best interests of the child will be the immediate and fundamental consideration in all Safequarding Policy concerns or incidents.
- **7.3** By referral to competent services, UPP will provide any child or children affected with the care they need in line with best practice child protection case management.