

## Child Protection Policy

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Compliance Manager	Board of Directors 16 / 05 / 2022
CROWE AS ITALY	

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## 1. Introduction and objective

In line with its Statute and Code of Conduct, HELPCODE is committed to ensuring the highest level of safeguarding for all the children with which we come into contact (either directly or indirectly) and for setting clear standards and procedures for protecting them from any risk and any form of abuse, violence and harassment.

HELPCODE has zero tolerance towards incidents of violence or abuse against children, committed either by employees or others affiliated with our work. All HELPCODE staff or others affiliated are explicitly prohibited from engaging in any activity that may result in any kind of Child Abuse. All HELPCODE staff or others affiliated are expected to conduct themselves in a manner consistent with this commitment and obligation. Any violations of this policy will be treated as a serious infraction and will result in disciplinary action being taken, up to and including termination and any other available legal remedy.

## 2. Key definitions

*Child or Children:* Anyone under 18 years of age.

*Child Abuse:* Anything which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood. The main categories of Child Abuse are Physical Abuse, Emotional Abuse, Neglect/Negligent Treatment, Sexual Exploitation & Abuse and Exploitation.

- *Physical Abuse:* Non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury or suffering to a child.
- *Emotional Abuse:* Harm to a child's emotional, intellectual, mental or psychological development. Emotional abuse includes but is not limited to any humiliating or degrading treatment, failure to meet a child's emotional needs, and rejecting, ignoring, terrorizing, isolating or confining a child.
- *Neglect/Negligent Treatment:* The failure to meet a child's basic physical and/or psychological needs either deliberately or through negligence.
- *Sexual Exploitation & Abuse (SEA):* All forms of sexual violence and coercion, sexual solicitation, manipulation or trickery including incest, early and forced marriage, rape, involvement in or exposure to indecent images/video (aka pornography), sexual slavery/trafficking, and statutory rape. Sexual abuse may include but is not limited to indecent touching or exposure, explicit sexual language towards or about a child and grooming. Sexual

abuse does not always involve touching. Sexual Exploitation is 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. Be aware that technology is a tool sometimes used to sexually exploit a child.

*Child Protection:* Child protection is making the world safe for children. It is HELPCODE mission and key area of work to protect children from all forms of abuse and exploitation in all regions of the world.

*Child Safeguarding:* The set of policies, procedures and practices that HELPCODE employs to ensure that ours is a child safe organization. It involves our collective and individual responsibility and preventative actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm by HELPCODE staff or others affiliated, who come into contact with children or impact them through our development interventions, humanitarian responses and operations. This includes our direct program implementation, work through partners and management of children's personal data.

### **3. Scope of the policy**

HELPCODE equips all staff, interns, volunteers, consultants and board members to understand and perform the child protection responsibilities and obligations. HELPCODE also applies appropriate standards to external parties, including visitors, community volunteers, contractors, partners, and others affiliated with partners or contractors, to address safeguarding risks relating to their engagement with HELPCODE's work. In the policy, the full range of people for whom all or some of it are relevant (either directly or through contractual arrangements) will be referred to as "HELPCODE staff and other affiliates".

All HELPCODE staff, volunteers, interns, consultants and board members sign an acknowledgement that they know, understand and will follow this Child Protection Policy (See *Annex 1 - Statement of Commitment to the Child Protection Policy*). Signed agreements are kept on file by the relevant office. All HELPCODE staff, volunteers, interns, consultants and board members, as well as partner employees or partner volunteers working within a HELPCODE project, receive adequate training at the start of employment, as well as periodic refresher or other safeguarding training at least once every two years thereafter.

While recognizing that some activities implemented with its financial and technical support might be outside its immediate control, especially when working through local partner organizations, HELPCODE must ensure that a zero tolerance approach is applied and enforced in any circumstances when the life and wellbeing of the children might be at risk. Therefore:

- Contractors engaged in situations where they—or their employees or subcontractors—may have access to children beneficiaries in HELPCODE programmes, or may have access to personal data about such children beneficiaries, receive a copy of the behaviour protocol and are requested to sign a policy compliance agreement. These requirements apply whether the Contractor is being paid for the services, or is providing them for free ('pro bono'), and is irrespective of the duration of the contract.
- In a project partnership where HELPCODE is the coordinator, Partners provide their child protection policy and procedures that must be approved by HELPCODE as appropriate for the project at issue. Alternatively, the Partner can agree to follow HELPCODE Child Protection Policy in carrying out the programme activities.

#### **4. Behaviour protocol**

HELPCODE staff or others affiliates must never:

- act in ways that may be abusive or place children at risk of abuse;
- hit, physically assault or physically abuse children or threaten to do so;
- engage in behaviours that are physically inappropriate or sexually provocative. This includes fondle, hold, kiss, hug or touch children or adult beneficiaries in an inappropriate or culturally insensitive way;
- engage in sexual activity or have a sexual relationship with anyone under the age of 18 years irrespective of the age of majority/consent or local custom;
- exchange money, employment, goods, or services for sex (including sexual favours, other forms of humiliating, degrading, or exploitative behaviour, or hiring sex workers) or other exploitative demands. This includes exchange of assistance that is already due to beneficiaries;
- stay alone overnight with one or more children benefitting from HELPCODE activities who are not part of their family, whether in their house, project premises or elsewhere. This includes prohibition to have a child beneficiary, who is not a part of their family, stay overnight at their home; sleep in the same bed or room as a child beneficiary, who is not a part of their family; invite children to stay overnight in a compound, hotel or other accommodations, with a non-relative HELPCODE staff or others affiliates;
- hire children in any form of child labour (including as “house help”) unless it is within the best

interest of the child and in alignment with local law and international standards ('Child labour' is work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling. 'Child work' in contrast may be beneficial if permitted by International Labour Organisation (ILO) Conventions and puts the child's interests ahead of any benefits gained by adults);

- take a child alone in a vehicle for HELPCODE work, unless it is absolutely necessary and with parental/guardian and managerial consent;
- exchange personal contact information or ask for children's personal information; misuse or be careless with personal data about individual children;
- communicate with a child via digital platforms (e.g. Facebook, Twitter), via mobile technology (e.g. texting, Whatsapp, Skype), or online without consent and knowledge of his/her parents. Further, HELPCODE staff or affiliates never communicate on mobile, digital or online platforms with children beneficiaries in ways that are inappropriate or sexual;
- expose child beneficiaries to inappropriate images, films, music and websites including mature content, indecent images (pornography) and violence.
- develop relationships with children which could in any way be deemed exploitative or abusive;
- use language, make suggestions or offer advice to children which is inappropriate, offensive or abusive;
- do things for child beneficiaries of a personal nature that they can do themselves (e.g., toileting, dressing, feeding, washing, etc.);
- act in ways that shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse;
- discriminate against, show unfair preferential or differential treatment towards particular child beneficiaries to the exclusion of others;
- ask to meet children away from other adults or spend excessive time alone with child beneficiaries away from others in a manner which could be interpreted as inappropriate; and/or
- condone or participate in behaviour of children which is unsafe or illegal.
- stay silent, cover up, or enable any known or suspected safeguarding incident or breach of this Policy by a HELPCODE staff or affiliates.

This is not an exhaustive or exclusive list. HELPCODE staff and other affiliates must, at all times, avoid actions that could be construed to constitute poor practice or potentially abusive behaviour. HELPCODE staff and other affiliates must never place themselves in a position where they are made vulnerable to allegations of misconduct.

Failure to follow the Behaviour Protocol, failure to follow any other part of the Child Protection Policy,

other inappropriate behaviour toward children, or failing to report a known or suspected safeguarding incident committed by a HELPCODE staff or affiliate, is grounds for discipline, up to and including termination of the employment or other affiliation with HELPCODE.

## **5. Communications, Social Media and Digital Technology**

HELPCODE takes care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a subject, and HELPCODE ensures images are honest representations of the context and the facts. In all forms of communication, children – as well as adult beneficiaries - are treated and portrayed with dignity and not as helpless victims or in sexually suggestive poses.

Children or adult beneficiaries who are primary subjects of text, photo and/or video resource gathered by HELPCODE employees must provide informed consent. Informed consent means the subject has a general understanding of the purpose of the reporting or photography, and gives verbal or written permission thereof. If the primary subject is a child, informed consent is also collected from the parent, guardian, or other legally required entity or individual.

In the following situations, written consent is collected from the child (as appropriate for age) or adult beneficiary:

- a) a child/adult beneficiary could be personally identified or
- b) the sensitive nature of their personal disclosure or situation could possibly cause damage to their privacy, dignity, safety or reputation, or
- c) where otherwise required by applicable law.

HELPCODE is committed to storytelling that raises awareness of and promotes solutions to ending violence and abuse against children beneficiaries. HELPCODE takes the following steps to prevent harm through communications, social media and digital technology (including photographs/videos/audio clips, stories, articles, or any other communication materials):

- a) Personal child and adult beneficiary information that is captured, stored or sent through electronic, on-line or mobile devices is password protected. In addition, data is handled in accordance with HELPCODE's current information security standards for personal data, which may include encryption and other requirements.
- b) Wherever possible, measures are taken to prevent electronic copying of photographs without HELPCODE permission.
- c) Recognising the special vulnerability of children, material posted on social media or digital technology does not contain a child's family name, sponsorship ID number, or child's personal

location/address.

- d) Material with a child or children is not geo-tagged to precise locations if it contains any part of the child's name.
- e) HELPCODE discourages direct, unfacilitated, undocumented communication through social media without HELPCODE's knowledge between: a sponsor/donor/visitor and registered/non-registered children and between staff/volunteers/other HELPCODE affiliates and registered/non-registered children.
- f) HELPCODE provides reporting and response options so that sponsors, donors, visitors, children or their caregivers can report any incident(s) where either party feels uncomfortable or threatened.
- g) Sponsorship welcome kits, HELPCODE websites, domains and social media platform profile pages contain reporting options for child protection concerns or incidents.

For the staff whose work tasks include communicating with children, this must be done via professional channels such as work email address or an official social media account. Personal social media should never be used to conduct work activities, especially as it relates to communications with children. HELPCODE makes sure that its staff is informed about the following:

- If staff social media are in public settings, any content generated can be viewed by anyone, including children.
- If a child beneficiary contacts a staff member or sends a social media request to his/her personal account, staff member consults with his/her manager for guidance and direction on how to proceed.
- Discussing or sharing, via public communication media, any sensitive, confidential or internal matters concerning children, their data or child safeguarding violations is strictly prohibited.



## **6. Visits to HELPCODE projects**

Visitors subject to this Policy include people going to a HELPCODE field programme or meeting with a HELPCODE beneficiary child(ren). This includes sponsors, donors, and other delegations from Support Offices such as bloggers, celebrity supporters, or journalists invited by HELPCODE. Government officials or institutional donors (government, multilateral) based in the hosting country do NOT require Safeguarding clearance, but are accompanied by a HELPCODE staff member.

Visits by all sponsors and private donors, and other international visitors are pre-approved by both the sending and the hosting office. Unannounced visits to sponsored children or HELPCODE project communities are not permitted. Each HELPCODE field office is diligent to ensure that visitors uphold the relevant sections of this Policy, including behavior protocol and communication provisions. The following requirements apply to visitors who visit a project or have direct contact with community members in HELPCODE programming areas.

Visitors from other HELPCODE offices who are staff or Board Members: The hosting office provides a brief orientation to any distinctive provision that applies in that context, as well as local customs regarding adult interaction with children.

## **7. Sponsorship program**

Sponsorship Program is one of the ways HELPCODE ensures the achievements of its mission and objectives. Specific Guidelines are in use at Country Offices level to ensure the implementation of the Sponsorship Program in the best interest of the sponsored children and their families. Communication packages are developed in order to inform the local communities about the aims of the Sponsorship Program.

In line with this Policy, sponsorship is implemented in a manner that keeps the safety of children as the top priority. This includes the review of all sponsor correspondence, training of staff and child monitors to recognise and respond to abuse, constructive interaction with parents and children, implementation of child protection programming interventions, the secure handling and storage of personal information, and gathering only the minimum elements of personal information necessary for the programme.

Sponsorship child monitors promote appropriate follow-up action or referrals if child safeguarding needs are observed or reported.

## **8. Implementation of the Policy**

The Director has the mandate to ensure that the policy is effectively internalized at all levels of the Organization. At Headquarter, a senior program officer shall be appointed as the focal point for compliance to the policy and will work in cooperation with the Human Resources, Projects and Communication Departments for the effective implementation of the policy. At the Country Offices, the Country Representative shall have overall responsibilities for ensuring the full compliance to the policy.

### *Recruitment*

HELPCODE shall ensure that the selection and recruitment process at HQ and Country Offices level are consistent with the overarching principle of ensuring the realization and respect of children's rights. The Human Resource Department at Headquarter level will provide support to Country Offices for developing appropriate selection procedures, in order to minimize the risks of child abuses.

### *Awareness and Prevention*

Staff, both at Headquarter and Country offices, will be trained and updated on child protection best practices. The Director at Headquarter level and the Country Representatives at Country Offices level shall foster an institutional culture where child protection issues are mainstreamed and fully applied.

### *Reporting*

HELPCODE shall promote a work environment responsive to any potential cases of child abuses. A clear reporting procedure, adjustable and suitable to local context and situations will be prepared and implemented at Country Offices levels where the Country Representative, assisted wherever available by a Human Resources officer, shall ensure a conducive and safe environment for reporting any suspicious case of infringement of child protection. HELPCODE shall promptly respond to any proven case of child abuse, as defined above, committed by one of its staff or other affiliates. The responses will be appropriate to and based on the gravity of the cases and might include staff dismissal and reporting to local authorities for further legal actions. In these cases, the Headquarter shall be promptly informed to evaluate reporting safeguarding violations to appropriate legal authorities, assessing any legal obligations to report, as well as the interests of the survivor(s). Generally reports are made, unless a report is judged likely to cause greater harm to existing victims or potential future victims.

The Director sends at least every six months to the Board of Directors, a Report containing the status

of any reports on Safeguarding.

### *Disclosure*

Whilst HELPCODE maintains appropriate confidentiality for individuals in protection incidents, HELPCODE may disclose information about incidents, when lawfully permitted, in order to support prosecution of suspected criminal activity, meet donor and regulatory requirements, support learning and accountability, advocate to prevent future incidents, or as required by law.

Information in ongoing investigations of protection incidents, and information about past incidents, is shared only with those on a 'need-to-know' basis, as deemed necessary by the Headquarters. If it is likely that sensitive information about survivors or about violence against children or adults will not be kept confidential, and would put people at risk if accessed by unauthorised parties, such information is not collected.

Detailed personal information, in particular health information, is not obtained or maintained by HELPCODE, except for the minimum necessary to ensure HELPCODE handles the matter appropriately. Such personal data is kept strictly confidential and protected in accordance with the applicable data protection and informational security standards.

## 9. Control Matrix

The minimum controls to be ensured by the procedure.

Scope	Control	Description	Frequency	Owner
Scope of the policy	CTRL 1	Verify that all staff have signed an acknowledgement on the child protection policy.	To event	HELPCODE staff Volunteers Interns Consultants Board members
	CTRL 2	Verify that contractors sign a compliance agreement policy.	To event	Contractors engaged
	CTRL 3	If Helpcode is the coordinator of a partnership project, verify the approval of the Child Protection Policy and the procedural model provided by Partners.	To event	Board members
Behaviour protocol	CTRL 4	Verify that the informed consent is signed by the child/adult beneficiary in the following situations: - a child/adult beneficiary could be personally identified - the sensitive nature of their personal disclosure or situation could possibly cause damage to their privacy, dignity, safety or reputation, - where otherwise required by applicable law.	To event	HELPCODE staff
Visits to HELPCODE projects	CTRL 5	Verify that visits from sponsors, private donors and other international visitors are approved in advance.	To event	Sending e Hosting Office
Implementation of the Policy	CTRL 6	Verify that this policy is distributed at all levels of the organization, as well as its effective implementation at local offices.	Annual	Director Country Representative
	CTRL 7	Verify that the Director sends to the Board of Directors, a Report containing the status of any reports on Safeguarding.	Six-monthly	Director