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**Integrated Service on Health and Development Organization**

**ISHDO**

**Child Safeguarding and Protection Policy**

**March 2021**

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**CHILD SAFEGUARDING AND PROTECTION POLICY**

# 1. POLICY STATEMENT

At ISHDO we are committed to recognising, promoting and protecting the rights of all children. ISHDO believes that the welfare of children is the highest priority and that is it the responsibility of everyone who works for and with ISHDO to ensure that children are protected from abuse and exploitation. We recognise that safeguarding considerations permeate all aspects of ISHDO ’s work and we strive to prioritise safeguarding in all ISHDO ’s policies, practices and activities.

In line with the United Nations Convention on the Rights of the Child (UNCRC), we recognise that all children, (meaning children under the age of 18 years), have a right to protection and freedom from abuse, including exploitation, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity.

We require all ISHDO Personnel and partners to uphold and demonstrate best practice in child safeguarding and protection to ensure that children who come in contact with ISHDO Personnel and/or staff of subrecipient partners are protected from any form of abuse or exploitation.

# 2. DEFINITIONS

The following definitions apply for purposes of this provision:

1. **Child:** A child or children are defined as persons who have not attained 18 years of age.
2. **Child abuse, exploitation, or neglect:** Constitutes any form of physical abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; or commercial, transactional, labor, or other exploitation resulting in actual or potential harm to the child’s health, well-being, survival, development, or dignity. It includes, but is not limited to: any act or failure to act which results in death, serious physical or emotional harm to a child, or an act or failure to act which presents an imminent risk of serious harm to a child.
3. **Physical abuse:** Constitutes acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm or risk of harm to a child’s health or welfare, or death. Such acts may include, but are not limited to: punching, beating, kicking, biting, shaking, throwing, stabbing, choking, or hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.
4. **Sexual Abuse:** Constitutes fondling a child's genitals, penetration, incest, rape, sodomy, indecent exposure, and exploitation through prostitution or the production of pornographic materials.
5. **Emotional abuse or ill treatment:** Constitutes injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to: humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the child feel diminished or embarrassed.
6. **Exploitation:** Constitutes the abuse of a child where some form of remuneration is involved or whereby the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to the child’s physical or mental health, development, education, or well-being.
7. **Neglect:** Constitutes failure to provide for a child's basic needs within USAID funded activities that are responsible for the care of a child in the absence of the child's parent or guardian.

# 3. SCOPE OF THIS POLICY

This policy applies to all ISHDO employees, contractors, consultants, fellows, advisors, interns and volunteers (referred to in this policy as ‘ISHDO Personnel’). This policy recognises that ISHDO Personnel may have access to sensitive, confidential information about children, access to images and may visit ISHDO programmes. Additionally, ISHDO recognises that direct services and support to children is primarily implemented by sub recipients. Consequently, ISHDO has requirements (set-out below) for all sub-grantees and third-parties that grantees may appoint.

# 4. CHILD SAFEGUARDING CORE PRINCIPLES*[[1]](#footnote-1)*

**ISHDO** is one of the local implementing partners implementing USAID funded project in various implementation towns of Oromia regional state. As USAID partner and responsible LIP, ISHDO agrees to abide by the following core principles mentioned below:

1. Ensure compliance with its implementation areas in the country and local child welfare and protection legislation or international standards, whichever gives greater protection, and with U.S. law where applicable.
2. Prohibit all personnel from engaging in child abuse, exploitation, or neglect.
3. Consider child safeguarding in project planning and implementation to determine potential risks to children that are associated with project activities and operations.
4. Apply measures to reduce the risk of child abuse, exploitation, or neglect, including, but not limited to, limiting unsupervised interactions with children; prohibiting exposure to pornography; and complying with applicable laws, regulations, or customs regarding the photographing, filming, or other image- generating activities of children.
5. Promote child-safe screening procedures for personnel, particularly personnel whose work brings them in direct contact with children; and
6. Have a procedure for ensuring that personnel and others recognize child abuse, exploitation, or neglect; mandating that personnel and others report allegations; investigating and managing allegations; and taking appropriate action in response to such allegations, including, but not limited to, dismissal of personnel.

# 5. EXPECTATIONS OF OUR SUBGRANTEES

The safeguarding and protection of children is a non-negotiable in all projects sub granted by ISHDO. Therefore, it is a requirement that all subgrantees:

1. Have their own tailored Child Safeguarding and Protection Policy.
2. Sign and adhere to ISHDO ’s Safeguarding and Protection Agreement; and
3. Work collaboratively with ISHDO’s designated staff where there are child protection concerns or disclosures.

This requirement also applies to all subrecipient personnel, partners and subcontractors who are engaged by the subrecipients to perform any part of the subgrant activity where working with or contact with children is identified.

ISHDO is committed to working with subgrantees to assist with drafting and implementing a Child Safeguarding and Protection Policy if they do not have one. ISHDO will review the Child Safeguarding or Protection Policy of all subgrantees as part of the application process. Once a subgrantee has been approved, ISHDO will adopt a collaborative approach and work with subgrantees to develop and/or strengthen their tailored Child Safeguarding and Protection Policy and may provide additional support to assist with this. Once ISHDO subgrantee project begins, ISHDO will have open and regular dialogue with the subgrantees regarding Child Safeguarding and Protection.

In the event that a concern or disclosure of abuse is reported to a subgrantee, the subgrantee will address it in accordance with its own child safeguarding or protection policy and national laws. In addition, the grantee must advise ISHDO’s Executive Director or Chief of Party or Programme Manger within three days of the knowledge of the concern or disclosure. Subgrantees are expected to provide regular updates to ISHDO as to the status of any investigation and the outcome of the process. At any time, ISHDO can request an independent audit of any subgrantee organisation in relation to child safeguarding and protection. Should any subgrantee fail to deal with safeguarding and protection issues in line with their policy or the ISHDO Safeguarding and Protection Agreement, ISHDO may terminate the Subgrant Agreement with immediate effect and, where appropriate, report the Grantee to appropriate safeguarding authorities.

# 6. ISHDO ’S SAFEGUARDING COMMITMENT

## Awareness:

At ISHDO, we commit to:

* ensuring that ISHDO Personnel understand what safeguarding and child protection are; what the risks to children they work with are; what is expected from their behaviour with children and their responsibilities to prioritise the well-being of children at all times;
* ensuring that ISHDO Personnel have read, understood and agree to uphold this policy;
* ensuring that ISHDO Personnel know where to access this policy and that it can be easily found on the ISHDO’s Common Drive in the server and website;
* actively promoting safeguarding and children’s rights to be protected, and ensuring that safeguarding is discussed with all subgrantees and that they agree to take their obligations seriously;
* sharing this policy with the broader donor community with whom ISHDO operates.

## Prevention:

We commit to:

* working collaboratively with our grantees to promote child safeguarding and protection best practices;
* discuss child safeguarding and protection actions, challenges and concerns/disclosures with subgrantees at each ISHDO subgrantee reporting interval (or at least every three months);
* have robust recruitment and selection processes to check that, to the best of our knowledge, all ISHDO Personnel are suitable to work with or have contact with children (regardless of whether or not contact with children will actually take place). This includes background checks, such as Disclosure and Barring Service (DBS) checks, behaviour based interviewing, specific questions on safeguarding in interviews to understand individuals’ attitudes to safeguarding, completing a self-disclosure form, and reference checks on suitability to work with children. The appropriate level of DBS check (basic, standard or enhanced) shall be determined by ISHDO taking into account the level of contact the individual is expected have with children. Should there be a change of circumstance or role (for example increased travel) resulting in increased contact with children, it is the responsibility of the individual to notify ISHDO who will conduct a further DBS check at a higher level;
* ensuring that all potential ISHDO Personnel sign up to and abide by this policy and the attached Code of Behaviour (Annex 1) before commencing employment / contracted work/ appointment;
* assign a staff who will be responsible for ensuring and controlling each office who is supported by the Management of ISHDO;
* taking stringent measures against any ISHDO Personnel or subgrantee who abuses a child, or who does not uphold this policy, including not taking action when they have reasonable grounds to suspet a child might be at risk of harm. This includes ISHDO reporting the individual/subgrantee to the relevant authorities and registers;
* safe storage of all confidential material, including material with personal data, in line with ISHDO policies.

## Reporting:

We commit to:

* ISHDO Personnel being clear what to do when child protection concerns or disclosures arise;
* ISHDO Personnel knowing who the delegated responsible staff is, who will deal regarding the Child Policy and how to contact them;
* all concerns or disclosures being reported to the immediately (within working hours);

## Responding:

We commit to:

* ensuring the safety of the child is always the first priority and that action is taken to support and protect children who are the subject of concerns regarding possible abuse;
* applying the principle of ‘best interests of the child’ to all child safeguarding protection concerns and disclosures;
* taking all concerns and disclosures seriously and fully supporting any ISHDO Personnel who in good faith raises his or her concerns. No form of coercion, intimidation, reprisal or retaliation against any ISHDO representative who reports any suspected form of abuse or exploitation is tolerated. See also ISHDO ’s Whistleblowing Policy and ISHDO ’s Whistleblowing statement;
* handling all concerns and disclosures in a confidential manner, with information shared on a ‘need to know’ basis;
* all incidents being dealt with promptly, and all cases relating to ISHDO Personnel being investigated and reported to the Executive Director within one month of being reported to the Focal Person of Child Protection. Where deemed necessary or appropriate (such as cases of serious harm to a child) the Focal Point will inform the Executive Director of ISHDO of grantee case details.

## Investigating:

ISHDO Personnel:

* If a concern or disclosure relates to a ISHDO Personnel, ISHDO will form a Child Protection Investigation Committee consisting of an Executive Director, the HR Manager, the Focal Person and an external protection expert.
* Where an allegation is made about a ISHDO Personnel, the individual may be immediately suspended from their employment or contract without prejudice, whilst the investigation takes place. Where feasible, a decision as to whether the individual can return to work, be dismissed or further time to make a decision is required, will be made by ISHDO ’s Executive Team and the Focal Person within 28 days. In some cases, particularly where local authorities are involved, more time may be required before a decision can be made.
* Should an allegation of abuse or other breach of this Safeguarding and Child Protection Policy be substantiated, the individual will be subject to disciplinary action in accordance with ISHDO’s Disciplinary Procedures which may include dismissal or termination of contract and reporting the concern/disclosure to relevant safeguarding authorities. ISHDO grantees:
* Where a concern or disclosure relates to a subgrantee, ISHDO requires all subgrantees to inform ISHDO within three (3) days of the concern / disclosure being made. Where the subgrantee chooses to seek advice or support from ISHDO regarding a concern or disclosure, ISHDO will support the subgrantee to investigate all concerns and disclosures in line with their Child Safeguarding and Protection Policy and local legislation. ISHDO and the subgrantee may decide to:
  + Internally investigate the concern or disclosure;
  + Report a concern or disclosure to a local children’s protection services
  + Report a concern or disclosure to the police particularly if someone is or may be in immediate danger
* Where ISHDO has concerns that a partner organisation is not following best practice, ISHDO may take independent action in line with this policy.
* All allegations regarding ISHDO Personnel and subgrantees will be handled equitably and transparently (with due regard to confidentiality) irrespective of whom they are made against, and taking into account the rights of the parties involved. Whilst aiming to make fair, fact-based decisions, ISHDO will always prioritise the well-being of children in its decision-making.

## Training and Education:

We:

* Provide training to all new ISHDO Personnel that may come into contact with children in their role, during their induction process, and in any case, within three months of starting with ISHDO .
* Provide annual refresher training to ISHDO Personnel that may come into contact with children in their role;
* Ensure ISHDO Personnel who have specific responsibilities for keeping children safe (including Focal Persons) have access to specialist advice, support and regular opportunities to update their skills and knowledge.

## Media and Communications:

We acknowledge that child abuse, including exploitation can occur through the use of information technology, such as when children are photographed or filmed in an inappropriate way. Transparency, openness and appropriate professional purpose underpin any ISHDO Personnel’s interaction with children including via electronic and digital means.

We:

* obtain informed consent from the child and the parents/guardian before taking a photograph, video or audio recording and ensure that an explanation as to how, where, when and for how long the photo or film will be used is provided;
* take care to assess local traditions or restrictions for reproducing personal image and endeavour to comply with them;
* ensure that children are presented in a dignified and respectful manner in text, photographs and film and that images are an honest representation of the context and facts;
* ensure that no pictures of children that can be interpreted as sexualised or degrading or shaming in any way shall be published by ISHDO or ISHDO Personnel;
* ensure that no personal data or sensitive information about any individual child that could compromise their care or protection is disclosed in publications or other materials, including surnames or any specific location details;
* ensure that pictures, materials and personal information regarding children are held in a secure place, whether physical or online and any lost or stolen equipment containing material should be reported immediately to the local Focal Person and to ISHDO ’s IT Officer
* report and record any complaints or concerns about inappropriate or intrusive images as a safeguarding concern.

## Monitoring and Review:

With subgrantees:

* ISHDO prioritises the monitoring and evaluation of proactive approaches to keeping children safe and responding to child protection concerns and disclosures.
* ISHDO requires that safeguarding is evaluated on a regular basis as agreed between ISHDO and the subgrantee. Safeguarding should be included in regular grantee reporting and evaluation.
* ISHDO may request further information based on evaluation reports. Reasons for this may be (1) high numbers of child protection cases (2) no reported child protection cases (3) other reasons as specified by ISHDO.

Internally, ISHDO will:

* monitor compliance of this policy within ISHDO and evaluate the effectiveness of this policy through annual checks, including an annual report to the Board detailing the number of incidents or concerns of safeguarding reported;
* commit to review this Safeguarding and Child Protection policy every two years or sooner where there are changes in legislation or within the organisation that affect this policy.

This policy has been approved by the Board and is effective from xx July 2020.

The policy was updated in March 2021.

# ANNEX 1 – CODE OF BEHAVIOUR

ISHDO is committed to recognising, promoting and protecting the rights of all children. ISHDO believes that the welfare of children is the highest priority and that is it the responsibility of everyone who works for ISHDO and with ISHDO to ensure that children are protected from exploitation or abuse.

ISHDO representatives working with or having contact with children are expected to treat all children with respect and dignity, prioritising the child’s safety and well-being at all times. As we expect the highest standard of behaviour from our representatives, this Code of Behaviour applies both in private and professional lives.

As an ISHDO representative you **must**:

* Act in a way that seeks to care for and protect the rights of children and act in their best interests
* Immediately report concerns or disclosures of child exploitation and abuse and policy non-compliance in line with the ISHDO Reporting Procedure
* Disclose any child related convictions or investigations you have been subject to which occurred before or during your association with ISHDO

As an ISHDO representative you **should**:

* Be aware of situations which may present risks and manage, plan and organise the work so as to minimise risks
* Ensure that another adult is always present when working in the proximity of children
* Ensure that a culture of openness exists to enable any issues or concerns to be raised and discussed
* Seek advice from ISHDO’s Safeguarding Focal Person if you are concerned about a child, even if it doesn’t appear significant, such as something not seeming quite right or making you feel uncomfortable.

As a ISHDO representative you **should never**:

* Use language or behaviour towards children that is inappropriate, harassing, abusive, sexual, provocative, demeaning or culturally inappropriate.
* Act in ways intended to shame, humiliate, belittle or degrade children or otherwise perpetrate any form of emotional abuse
* Form an intimate relationship with a child or any other relationship that could in any way be deemed exploitative or abusive
* Engage children under the age of 18 in any form of sexual activity, including showing a child sexual images, asking a child to take or show you sexual images and/or using sexualised language and/or sexualised behaviour in front of a child
* Invite unaccompanied children into a private residence
* Sleep in the same room as unsupervised children without a second adult being present
* Condone, or participate in, behaviour of children which is illegal, unethical, unsafe or abusive
* Condone abusive activities between children such as initiation ceremonies or bullying
* Use computers, mobile phones, video cameras or social media to exploit or harass children or access child exploitation material through any medium
* Befriend children who you come into contact with through work on social media
* Use physical punishment on children
* Hire children for domestic or other labour
* Photograph or film children without consent.

This is not an exhaustive or exclusive list. The principle is that ISHDO Personnel should avoid actions or behaviour which may constitute poor practice or (potentially) abusive behaviour. Whilst “children” for the purposes of this policy means children under the age of 18 years, the Code of Behaviour also applies to ISHDO Personnel’s interactions with any young person of or over the age of 18 who is connected with ISHDO community based development programme.

I have read the above Code of Behaviour, understand it, and agree to comply with it:

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Role title: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

# ANNEX 2 – Child Protection Acknowledgment Form

ISHDO is proud of its Family Centered and rights-based approach in supporting children in its program.

* ISHDO will take all necessary steps to ensure that all staff, consultants, volunteers and staff of project partners understand that the welfare and overall development of all children is to be respected.
* ISHDO recognizes that all children, whatever their age, culture, disability, gender identity, language, racial origin, religious beliefs and/or sexual identity, have the right to protection from abuse as well as other protections and rights afforded children under the U.N. and ILO conventions on the rights of the child.
* All suspicions and allegations of abuse against children and young persons will be taken seriously and responded to swiftly and appropriately.

A child is defined as a person under the age of 18 (U.N. Convention on the Rights of the Child, 1989). Every ISHDO employee has a duty to safeguard all children from harm whether they are project beneficiaries or not.

I have read and understand ISHDO’s Child Safeguarding Policy agree to adhere to that Policy.

I understand that as part of that Policy the following practices are prohibited:

* Spending time alone with a child (one on one) or with children away from others
* Employing children as domestic servants or for any other work
* Taking or dropping off a child to an event
* Engaging in rough physical or sexually provocative games with children, including horseplay
* Sharing a room with a child • Allowing or engaging in any form of inappropriate touching of children
* Making sexually suggestive comments to a child, even in fun
* Reducing a child to tears as a form of control
* Allowing allegations made by a child to go unchallenged, unrecorded or not acted upon
* Using sporting or extracurricular events as an opportunity to take inappropriate photographs or film footage of children in vulnerable positions

This is not an exhaustive or exclusive list.

The principle is that staff should avoid actions or behavior which may constitute poor practice or potentially abusive behavior.

**Name:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ **Position** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Signature:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Date:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. USAID Standard provisions for Non – U.S. Nongovernmental Organizations A Mandatory Reference for ADS Chapter 303, Revised in November 2020. [↑](#footnote-ref-1)