



GLOBAL CHILD

PROTECTION

POLICY



Acronyms

<i>BID</i>	Best Interest Determination
<i>CAAFAG</i>	Children Associated with Armed Forces or Armed Groups
<i>CBCM</i>	Community-Based Complaint Mechanism
<i>CBO</i>	Community-Based Organisation
<i>CP</i>	Child Protection
<i>CPWG</i>	Child Protection Working Group
<i>FGM</i>	Female Genital Mutilation
<i>FP</i>	Focal Point
<i>FTR</i>	Family Tracing and Reunification
<i>GBV</i>	Gender-Based Violence
<i>GBVIMS</i>	Gender-Based Violence Information Management System
<i>HOM</i>	Head of Mission
<i>HQ</i>	Head Quarters
<i>HR</i>	Human Resources
<i>IACPIMS</i>	Inter-Agency Child Protection Information Management System
<i>IASC</i>	Inter-Agency Standing Committee
<i>IDTR</i>	Identification, Documentation, Tracing and Reunification
<i>ISP</i>	Information Sharing Protocol
<i>IGO</i>	Intergovernmental Organisation
<i>ILO</i>	International Labour Organisation
<i>INEE</i>	Inter-agency Network for Education in Emergencies
<i>IP</i>	Implementing Partner
<i>NGO</i>	Non-Governmental Organisation
<i>PSEA</i>	Protection from Sexual Exploitation and Abuse
<i>SEA</i>	Sexual Exploitation and Abuse
<i>SOP</i>	Standard Operating Procedure
<i>TORs</i>	Terms of Reference
<i>UASC</i>	Unaccompanied and Separated Children
<i>UN</i>	United Nations
<i>UNCRC</i>	United Nations Convention on the Rights of the Child
<i>UNHCR</i>	United Nations High Commissioner for Refugees
<i>UNICEF</i>	United Nations Children's Fund



Table of Content

Key Definitions	4
Introduction	6
Our values, principles and beliefs	8
Our behaviour protocols	11
Our strategic approach	14
Our global practices and operational guidelines	17
Resources and Annexes	40

Key definitions

The following definitions will serve as a guide in connection with this policy, although contextualised forms of child harm must also be identified by each INTERSOS Country Mission:

Child: Any person below the age of 18 years. The United Nations Convention on the Rights of the Child (UNCRC) defines a 'child' as "every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier" (1989, Article 1). While INTERSOS respects and adheres to national laws in countries of operations, this policy does not define a child based on the legal age of majority. The Committee on the Rights of the Child, the monitoring body for the Convention, has encouraged States to review the age of majority if it is set below 18 and to increase the level of protection for all children under 18.

Child Protection: "The prevention of and response to abuse, neglect, exploitation and violence against children"¹. Child protection means safeguarding children from harm. Child protection is not the protection of all children's rights, which is the responsibility of everyone working with children, but refers instead to a subset of these rights.

Forms of Harm: Harm includes abuse, neglect, exploitation and violence. Specific forms of harm are²:

- **Physical Abuse:** Actual or potential physical harm perpetrated by another person, adult or child. It may involve hitting, shaking, poisoning, drowning and burning. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.
- **Sexual Abuse:** Forcing or enticing a child to take part in sexual activities that he or she does not fully understand and has little choice in consenting to. This may include, but is not limited to, rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing and touching. It may also include involving children in looking at, or producing sexual images, watching sexual activities and encouraging children to behave in sexually inappropriate ways.
- **Child Sexual Exploitation:** A form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, which may involve befriending children, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual.

Child sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs

1. Minimum Standards for Child Protection in Humanitarian Action, Child Protection Working Group (CPWG) (2012)
 2. Keeping Children Safe – Child Safeguarding Standards and how to implement them, Keeping Children Safe Coalition (2012)

and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple men.

- **Neglect and Negligent Treatment:** Allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in serious impairment of a child's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children from harm and provide for nutrition, shelter and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill treatment of a disabled child.
- **Emotional Abuse:** Persistent emotional maltreatment that impacts on a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.
- **Commercial Exploitation:** Exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour.

INTEROS Personnel and Associates: Any person employed by or working with INTEROS. Specifically, INTEROS personnel refers to all individuals who have entered into an employment or collaboration contract with INTEROS, including staffs, volunteers, community committee members, interns and consultants, regardless of whether or not they are compensated monetarily, and regardless of the type or duration of their contract; while INTEROS associates refers to all personnel of other entities or individuals who have entered into a cooperative arrangement with INTEROS, including contractors, partners and visitors.

Humanitarian Aid Worker: Any person involved in providing assistance to affected populations. It refers to all personnel of humanitarian agencies and organisations, including UN Agencies, IGOs, NGOs, IPs and relevant CBOs, as well as anyone performing a task on behalf of any humanitarian agency or organisation, regardless of whether or not they are compensated monetarily, and regardless of the type or duration of their contract.

Types of CP Incidents:

- **Type 1:** Any violation of children's rights to protection from abuse, neglect, exploitation and violence – including trafficking, sexual and labour exploitation, FGM and early marriage – which is NOT committed by an INTEROS personnel member or associate, or a humanitarian aid worker at large. It may be perpetrated by an adult or adults or another child or children of the affected or local community against a child who benefits from INTEROS programmes or a child who is not involved in INTEROS activities.
- **Type 2:** Any violation of the Global CP Policy and related standards of behaviour which is committed by an INTEROS personnel member or associate. Harm which is committed by another humanitarian aid worker is also considered a CP Incident Type 2.



INTRODUCTION

INTERSOS is a non-profit humanitarian aid organisation that works to bring assistance to people in danger, victims of natural disasters and armed conflicts. Established in 1992 with support from the Italian Federation of Trade Unions, its actions are based on the values of solidarity, justice, human dignity, equal rights and opportunities for all people, and respect for diversity and coexistence, paying particular attention to the most vulnerable.

INTERSOS is committed to promoting within its work the United Nations Convention on the Rights of the Child (UNCRC) which states that “**State parties have a duty to protect the child from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse**” (1989, Article 19).

This policy builds on common values, principles and beliefs, and describes the steps that will be taken in meeting our commitment to protecting children from harm in all our humanitarian response operations.

The Global Child Protection Policy was adopted by Secretary General, September 2017.



OUR VALUES, PRINCIPLES

AND BELIEFS

INTERSOS Charter of Values states that INTERSOS is committed to **non-discrimination** (“working without borders”), **impartiality** (need-based assistance free from political, religious or social distinctions), **solidarity, transparency, sensitivity to local cultures**, promoting **human dignity, participation** and **dialogue**.

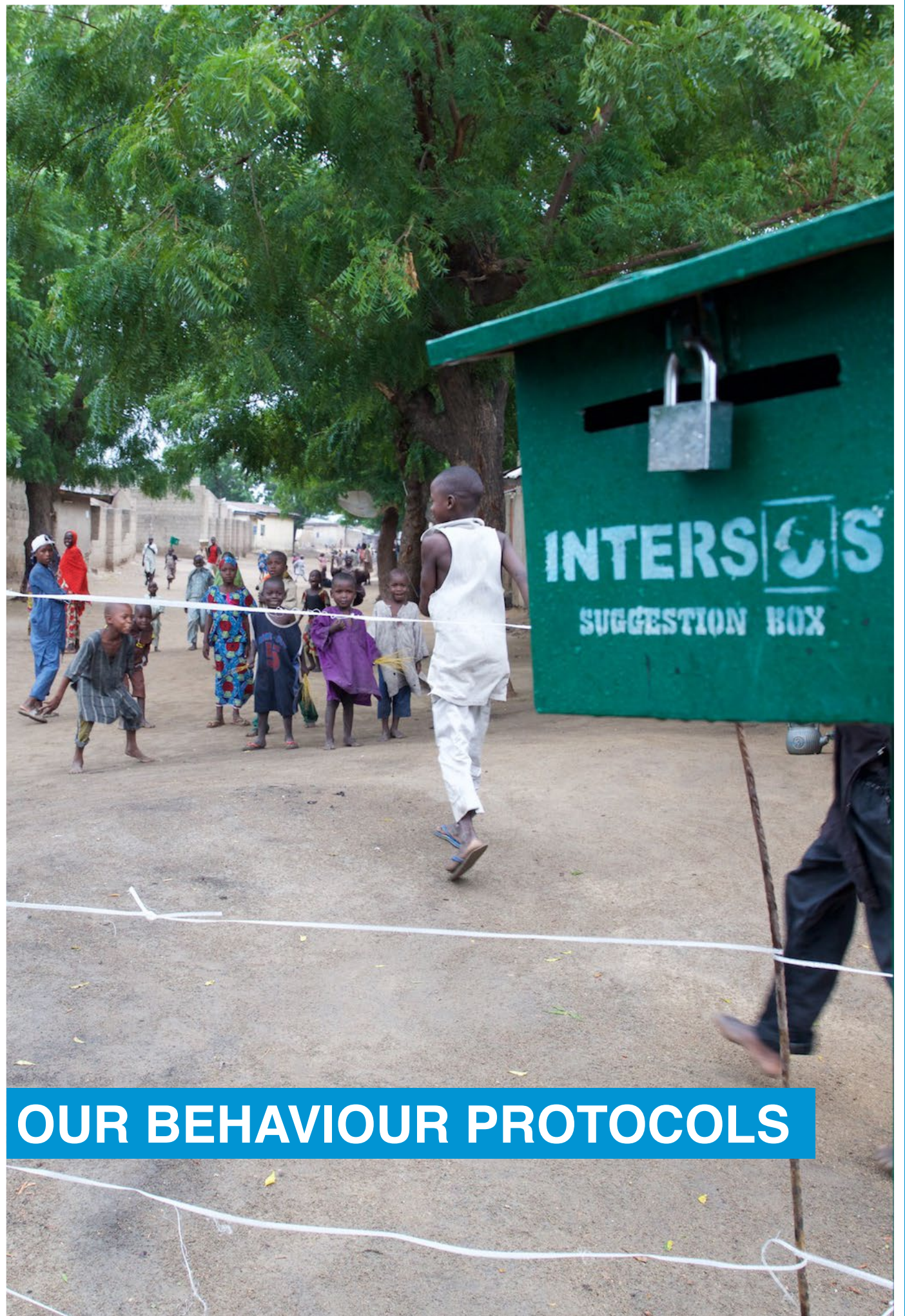
INTERSOS Charter of Values and Code of Ethics guide our commitment to child protection based on the principles within the United Nations Convention on the Rights of the Child (UNCRC). All INTERSOS personnel and associates must uphold and promote the highest standards of ethical and professional conduct, and abide by INTERSOS policies. This policy is based on affirming the responsibility of INTERSOS Board of Directors, personnel and associates to promote the rights of children, protect children from all forms of harm and adhere to the minimum standards of protection for children.

INTERSOS recognises that all children have equal rights to protection from abuse, neglect, exploitation and violence, and that everyone has a responsibility to support the protection of children. We are therefore committed to the following:

1. **Promoting survival and development of children:** As well as children’s right to life, right to protection from all forms of abuse, neglect, exploitation and violence, INTERSOS commits to identifying and taking concrete action to reduce the effects of the emergency and the response on the physical, psychological, emotional, cognitive, social and spiritual development of children. This includes family reunification, preventing family separation, promoting family-based environments, with interim care and durable solutions considered as secondary options based on the best interests of the child.
2. **Ensuring that all children in need benefit from INTERSOS programmes without discrimination³:** INTERSOS is committed to provide support to children, families and communities without distinction of any kind, such as race, colour, ethnicity, religion, sexuality, language, age, disability, gender, sex, political or other opinion, family circumstances, health, marital status, birth or other status. INTERSOS recognises that emergencies often magnify existing differences and further marginalise those already at risk of discrimination. INTERSOS is committed to identifying and monitor existing and new patterns of discrimination and power, and tackle them in the response as part of its commitment to the “Do No Harm” principle. INTERSOS will also take special measures to ensure appropriate and adequate care is provided to children with disabilities, unaccompanied and separated children (UASC), child-headed households, children in conflict with the law, children associated with armed forces or armed groups (CAAFAG), and other marginalised groups.

3. Based on affirming INTERSOS commitment to the United Nations Convention on the Rights of the Child (UNCRC) (1989); the Convention on the Elimination of all forms of Discrimination Against Women (CEDAW); the United Nations Convention on the Rights of Persons with Disabilities (2012); the ILO Convention No. 182 on the Worst Forms of Child Labour (1999); the Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography (2000); the Refugee Convention (1951); the Guidelines on Internally Displaced Persons; the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the UN Convention against Transnational Organized Crime; the Minimum Standards for Child Protection in Humanitarian Action; the UN Secretary-General’s Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse; the IASC Six Core Principles Relating to Sexual Exploitation and Abuse. Also the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1987); the Guidelines on the Protection of Child Victims of Trafficking UNICEF technical notes; the ILO Convention on the Minimum Age for Workers (1973).

- 3. Encouraging and enabling child participation in all activities concerning children and their communities:** INTERSOS is committed to ensuring that girls and boys of different ages and abilities are given space and time to meaningfully participate. INTERSOS personnel and partners must be aware of their own values, beliefs and assumptions about childhood and the roles of the child and the family, and avoid imposing these on children. They should enable developmentally appropriate ways of child participation, share power with children in decision making, and be sensitive to how children's participation can, when done poorly, upset children's social roles and exposure to harm.
- 4. Ensuring that the best interests of the child are paramount:** In all actions concerning children, the best interests of the child will be a primary consideration. This principle should guide the design, monitoring, and adjustment of all humanitarian programmes and interventions. Where INTERSOS takes decisions regarding individual children, this needs to be based on the Best Interest Determination (BID) process.
- 5. Promoting sensitivity to local culture and adherence to the UNCRC:** INTERSOS is committed to respecting local customs and culture, whilst at the same time honouring and promoting the fundamental rights belonging to children as enshrined in the UNCRC. INTERSOS will consistently recognise children as those under the age of 18 years, even if the legal age of majority is at a lower age. INTERSOS will work to protect children from traditionally sanctioned forms of child harm, such as corporal punishment, Female Genital Mutilation (FGM) and early marriage.



OUR BEHAVIOUR PROTOCOLS

The following specific standards of behaviour apply to all INTERSOS personnel - including staffs, volunteers, community committee members, interns and consultants - while under collaboration with INTERSOS and at all times, this includes both within working hours and outside of standard working hours:

- Promote child participation. Always listen to children, and encourage children and their families to be involved in making decisions relating to their lives.
- Promote non-discrimination. Treat children equally, irrespective of the child's or his/her parents' race, colour, ethnicity, religion, sexuality, language, age, disability, gender, sex, political or other opinion, family circumstances, health, marital status, birth or other status.
- Deliver aid assistance to children and communities in ways which do not abuse your position of power, trust and authority.
- Be aware that physically touching a child, perhaps to offer comfort, can be misconstrued by observers or the child.
- Avoid situations which isolate children and where your behaviour cannot be observed such as in cars, offices and homes.
- Where possible and practical, follow the 'two-adult' rule while conducting work, where two or more adults supervise all activities that involve children, and are visible and present at all times. If this rule is not possible in practice, seek alternatives such as being accompanied by community members or interacting in open spaces.
- Promote a culture of openness where issues and concerns can be raised, discussed among staffs, with children and communities.
- Ensure that all communications regarding children guarantee the protection, confidentiality, privacy, dignity and best interests of the child.
- Ensure when making images of children or their families (photos, video, etc.) that they are respectful, that people are adequately clothed and that sexually suggestive poses are avoided. No image where children and their families are identifiable can be made public through social media or other means without the informed consent or assent of the subjects (see Section 5.5 Safe communication).
- Report any child protection concern in a timely manner and in accordance with INTERSOS established reporting procedures (see Section 5.8 Reporting procedures). In the case where it is known or it is suspected that a child is at risk or suffering abuse, take urgent action to report and, where necessary, refer the child to appropriate services.
- Comply with child protection related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation.
- Challenge poor practices, and report potential risks which might lead to cause harm to children.

Moreover, INTERSOS personnel should never:

- Smack, hit or physically abuse children, whether as a form of discipline or otherwise.
- Engage in any form of sexual relations with children or beneficiaries.
- Engage in any form of inappropriate physical behaviour such as kissing, hugging or touching a child.
- Use inappropriate words, offensive, threatening or intimidating behaviours that shame, humiliate, belittle or degrade children or engage in emotional abuse.
- Act in a manner or organise activities which are abusive or place children at risk of abuse.
- Spend excessive time alone with a child excluding him/her from others.
- Stay alone with children in a room with the door closed and where you cannot be seen by other people, or invite a child / children to your place of residence.
- Develop abusive or exploitative relations with children, including hiring children for domestic or other labour.
- Condone or participate in activities where the child's behaviour is likely to lead to abusive or illegal acts.
- Discriminate through preferential treatment to a child (i.e. gifts, sponsorships, money, etc.).
- Use, download or buy pornography, or other photography or video, for sexual purposes.
- Take images of children (photos, video, etc.) which are detrimental or explicit and undermine the child's dignity.
- Share photos on social media, including facebook, instagram, twitter, etc. where children and/or their families are identifiable, as this could potentially put children at serious risk.
- At any time make comments to the media on child protection matters except where the Head of Mission has previously been made aware of media interest and agreed the response in advance.
- At any time breach confidentiality, informed consent or incident reporting procedures regarding a child protection incident or case.

All INTERSOS personnel are obliged to adhere to these standards of behaviour. Failure to comply with these standards or failure to report child protection concerns is grounds for disciplinary action. This action may include termination of contract or summary dismissal, and may result in the case being forward to the local authorities for criminal prosecution where appropriate and in accordance with applicable national laws.

The standards set out above are not intended to be an exhaustive list. Other types of inappropriate behaviour towards children may be grounds for disciplinary action pursuant to the INTERSOS Charter of Values and Code of Ethics. INTERSOS personnel must not engage in any form of humiliating, degrading or exploitative behaviour under any circumstances.



OUR STRATEGIC APPROACH

INTERSOS recognises that the successful implementation of the Global CP Policy depends on the individual and collective responsibility of all those who work for and with INTERSOS, including partners, communities and children themselves.

INTERSOS intends to meet its commitment to protecting children from harm through the following approach:

- **Awareness:** Ensuring that all INTERSOS personnel and associates, as well as target children and communities, are aware of what child harm is, the risks of child harm to children's safety, well-being, dignity and development, and INTERSOS zero tolerance towards child harm.
- **Prevention:** Ensuring that children are protected from harm by INTERSOS personnel and associates through safe recruitment, safe cooperative arrangements, safe programming and safe communication practices, and by promoting an environment where all INTERSOS personnel and associates work to minimise the risks which might lead to cause harm to children.
- **Reporting:** Ensuring that complaint mechanisms for reporting child protection concerns are in place and accessible, and that all INTERSOS personnel and associates are clear what procedures to follow where concerns arise regarding a CP incident.
- **Response:** Ensuring that appropriate measures are taken to protect and support children where concerns arise regarding a CP incident, and that commensurate actions are taken where suspicions regarding a CP incident are validated.
- **Promoting culture of openness, sensitivity and support:** Ensuring that INTERSOS management favours open lines of communication and dialogue, and an atmosphere of support in order to implement and improve INTERSOS CP prevention practices and response procedures.

Roles and responsibilities

Although it is the responsibility of all INTERSOS personnel and associates to promote child protection, INTERSOS recognises that a clearly defined management and technical support structure will facilitate implementation of and adherence to the Global CP Policy.

The following outlines relevant management and technical support roles and responsibilities within the Organisation:

- **Executive Management:** The INTERSOS Board of Directors and Secretary General will have overall responsibility for the implementation of and adherence to the Global CP Policy, as well as for mobilizing the associated necessary resources.
- **Senior Management:** The INTERSOS Director General, Director of Programmes, Director of Human Resources, Coordinator of Logistics Unit and Coordinator of

Communication and Fundraising Unit at HQ will be responsible for ensuring the implementation of and adherence to the Global CP Policy across the Organisation. The INTERSOS Regional Directors and Heads of Mission will be responsible for developing and regularly revising the country-specific CP strategies and related SOPs, as well as for ensuring the implementation of and adherence to the Global CP Policy within the country missions. The INTERSOS Regional Directors and Heads of Mission will also be responsible for mobilizing the associated necessary resources at the regional and country level.

- **Technical Support:** The INTERSOS Global Protection Advisor, Regional Protection Advisors and Country Protection Coordinators will be responsible for providing technical support for the implementation of and adherence to the Global CP Policy at the global, regional and country level. These positions will also be responsible for supporting the development and revision of the country-specific CP strategies and related SOPs.

A **CP Policy Steering Committee** will be established to monitor and regularly report on progress to implement and adhere to the Global CP Policy to the INTERSOS Board of Directors and Secretary General. The CP Policy Steering Committee will be composed by the INTERSOS Director General, Director of Programmes, Director of Human Resources, Coordinator of Logistics Unit, Coordinator of Communication and Fundraising Unit, and Global Protection Advisor at HQ. The CP Policy Steering Committee will meet on ad-hoc basis to provide oversight and management support for alleged CP Incidents Type 2. Moreover, the CP Policy Steering Committee will be responsible for regularly revising the Global CP Policy.

A **HQ CP Focal Point** will also be appointed to coordinate the work of the CP Policy Steering Committee and lead the development of training and awareness materials on the content of the Global CP Policy and related standards of behaviour. The HQ CP Focal Point will be the person designated to receive complaints and reports about alleged CP Incidents Type 2 in the HQ.



OUR GLOBAL PRACTICES

AND OPERATIONAL GUIDELINES

Training and Awareness

For effective implementation of the Global CP Policy, INTERSOS commitment to child protection needs to be understood clearly and accurately by all INTERSOS personnel and associates, as well as target children and communities.

Therefore, INTERSOS is committed to the following:

- Include in the induction process for all new staffs, volunteers, community committee members, interns and consultants - international and national – a module on what CP is and the content of the Global CP Policy in order to ensure that all INTERSOS personnel is aware of the Global CP Policy guiding principles, the related standards of behaviour, the implications of breaching these standards and the incident reporting procedures.
- Conduct repeated refresher training for personnel at both field and HQ level on the content of the Global CP Policy and related standards of behaviour. Appropriate support should be made available to training participants who experience an emotional reaction to the topics covered.
- Provide opportunities for internal and external training on child protection, particularly to identify activity-specific child protection risks and practically implement the Minimum Standards for Child Protection in Humanitarian Action (CPMS, 2012)⁴.
- Raise awareness widely amongst target communities on what child harm is, children's rights to protection from all forms of harm, INTERSOS zero tolerance towards child harm and options for reporting child protection concerns.
- Orient children involved in INTERSOS programmes on their rights to protection from all forms of harm, INTERSOS zero tolerance towards child harm and options for reporting child protection concerns in a child-friendly manner which is age, gender and diversity sensitive. This includes organising workshops with children to define acceptable and unacceptable behaviour by adults or other children, and discuss openly with them about their contacts and relationships with INTERSOS staffs and others. Appropriate support should be made available to workshop participants who experience an emotional reaction to the topics covered.
- Make the Global CP Policy summary available in local languages and develop a child-friendly version to be disseminated in target communities, with partners and other relevant stakeholders. Posters of the Global CP Policy commitments and related standards of behaviour must also be displayed in each country office/base.
- Monitor and regularly review the effectiveness of the CP training and awareness materials and programmes. This process should involve the participation of children as and when appropriate.

⁴ The Minimum Standards for Child Protection in Humanitarian Action (CPMS, 2012) can be accessed from the link <http://cpwg.net/minimum-standards/>

Safe Recruitment

INTERSOS is committed to undertake child-safe recruitment and screening practices before formalising collaboration with staffs, volunteers, community committee members, interns and consultants.

Recruitment Process:

The mandatory practices required for recruitment of international and national positions are:

- All job advertisements will state that INTERSOS has a Global CP Policy that the successful candidate will be expected to comply with and promote.
- Candidates who are short-listed for interview will be provided with the abstract of the Global CP Policy in advance of their interview (see Annex 1: Abstract of the INTERSOS Global CP Policy) and there will be specific standardised interview questions on protection of children from harm (see Annex 2: Guidelines for Safer Recruitment).
- Particular attention will be paid to gaps in an individual's employment history and frequent changes of employment and/or address.
- All prospective staffs and consultants will be required to provide at least two references, including the last line manager. References from family members will not be accepted. References will be checked on any child protection issue or incident involving the candidate, and dismissal or pending investigation into behavioural misconduct (see Annex 2: Guidelines for Safer Recruitment).
- Volunteers and interns will also be required to provide at least two references, if possible including at least one among the staffs of the entity they have previously been working or volunteering for. References from family members will not be accepted.
- The successful candidate will be required to provide proof of identity (passport or national identity document) and a personal declaration stating any criminal conviction, including spent convictions (see Annex 3: Declaration of Criminal Convictions). Where possible, a criminal record check in the candidate's country of origin will be conducted.
- The Global CP Policy will be included in the proposal of collaboration.
- All staffs, volunteers, community committee members, interns and consultants will be required to acknowledge in writing the receipt, understanding and commitment to the Global CP Policy and related standards of behaviour prior to commencement of their contract/placement (see Annex 4: Declaration of Agreement to be Bound by and Uphold the INTERSOS Global CP Policy and the INTERSOS PSEA Policy for Personnel). The signed statement of commitment to the Global CP Policy will be kept on file together with the signed employment or collaboration contract.
- An assessment of the individual's commitment to comply with and promote implementation of the Global CP Policy will be included in the standard internal performance review process cycle (see Annex 2: Guidelines for Safer Recruitment).

Hiring Restrictions:

INTERSOS reserves the right not to hire or employ an applicant if the recruitment process or background check reveals that the applicant is not suitable to work with children.

INTERSOS will not hire or employ anyone with a prior conviction for child abuse, paedophilia or related offence. In the case that applicable national laws prohibit this rule, no person with such a conviction will be hired into, or permitted to hold a position with direct contact with children or access to their personal information, including photographs.

Safe Cooperative Arrangements***Contractors:***

INTERSOS will not enter into contractual agreements for the supply of goods, services or works with contractors which are known to utilise child labour or are involved in any other practice that can harm or is likely to cause harm to children. The ILO Convention No. 138 on the minimum age for admission to employment and work (Version 1973) guides INTERSOS with the following definitions: **1) Hazardous Work:** work which is likely to jeopardize children's physical, mental or moral health, safety or morals should not be done by anyone under the age of 18; and **2) Light Work:** children between the ages of 13 and 15 years old may do light work, as long as it does not threaten their health and safety, or hinder their education or vocational orientation and training.

The Logistics Unit at the HQ and country level will be responsible for supporting the implementation of the following mandatory practices:

- As part of the pre-qualification and bidding processes, all potential contractors will be required to submit together with the official documentation the Supplier/Tenderer's Declaration to the effect they are aware and formally agree to abide by the ethics clauses specified in the INTERSOS Organisation Management and Control Model and INTERSOS Code of Ethics, and commit to immediately inform INTERSOS if any change occurs in this respect at any stage of the award process or during the fulfilment of the contract itself. This declaration must cover all the partners in joint venture/consortium, as well as all the sub-contractors and suppliers of the potential contractor.
- Where possible, an independent background check into the contractor's business practices will be conducted to inform the pre-qualification assessment or bid analysis.
- The Supplier/Tenderer's Declaration and the information from a possible independent background check will be used by the Evaluation Committee in the selection process. Copies of all official documentation will be kept on file.
- The above-mentioned ethics clauses will be integral part of any supply, service or works contract.

INTERSOS reserves the right to suspend or cancel a contractual agreement for the supply of goods, services or works, if child labour or any other practice that can harm or is likely to cause harm to children are discovered at any stage of the award process or during the fulfilment of the contract itself on the basis of investigation into allegations of harm to children. However, INTERSOS will ensure that termination of a contractual agreement is carefully considered as

a last resort and dependent on the contractor's mishandling of the child protection concern rather than on the basis of the child protection concern having arisen, reported and handled according to the INTERSOS Global CP Policy.

Partners:

Acceptance of and compliance with the Global CP Policy and related standards of behaviour must be a condition of every partnership agreement or sub-agreement. INTERSOS will not enter into partnership arrangements with entities – international or national, humanitarian or institutional – which utilise child labour according to the ILO Convention No. 138 on the minimum age for admission to employment and work (Version 1973), and do not commit to protecting children from harm.

INTEROS must ensure the following mandatory practices when working with partners:

- An assessment about the partner's commitment and capacity to prevent and respond to harm to children will be conducted prior to signing a partnership agreement or sub-agreement, as well as at regular intervals during the implementation. The assessment must take into consideration also the partner's contact with children and the activity specific CP risks.
- Partners which do not have their own robust CP Policy will be required to sign up to the INTERSOS Global CP Policy as a condition of any partnership arrangement (see Annex 5: Declaration of Agreement to be Bound by and Uphold the INTERSOS Global CP Policy for Partners). The statement of commitment to the INTERSOS Global CP Policy must be signed by the legal representative of the partner and will be kept on file by both parties. The personnel of the partner will need to be made aware of the content of the INTERSOS Global CP Policy and related standards of behaviour.
- Where possible, training will be offered to partners to identify CP risks and define related CP mitigation measures throughout programming, as well as to develop their own robust CP Policy.

INTEROS reserves the right to suspend or cancel a partnership agreement or sub-agreement on the basis of investigation into allegations of harm to children. However, INTEROS will ensure that termination of a partnership agreement or sub-agreement is carefully considered as a last resort and dependent on the partner's mishandling of the child protection concern rather than on the basis of the child protection concern having arisen, reported and handled according to the INTERSOS Global CP Policy.

Visitors:

Visitors to INTERSOS or INTERSOS partners' programme activities that involve children will also be bound by the Global CP Policy standards of behaviour.

In order to protect children from harm, the following practices are applied for visitors, including journalists, photographers, celebrity ambassadors, authorities, donors, personnel of other agencies or organisations, and other stakeholders:

- All visitors should be advised that the Global CP Policy prohibits unannounced visits to programme activities that involve children.



- A clear agenda should be developed and approved by the HOM prior to visit. The agenda will also be referred to confirm with the Country Protection Coordinator, Regional Protection Advisor or Global Protection Advisor for clearance.
- Prior to commencement of their visit, visitors should be provided with the abstract of the Global CP Policy (see Annex 1: Abstract of the INTERSOS Global CP Policy), briefed about the related standards of behaviour by an INTERSOS representative at the HQ or country level, and required to sign a declaration to the effect they are aware and formally agree to comply with these standards (see Annex 6: Declaration of Agreement to be Bound by and Uphold the INTERSOS Global CP Policy Standards of Behaviour for Visitors).
- All visitors will be accompanied during the visit by an INTERSOS staff member trained on CP. The presence of a partner staff member cannot replace the presence of a qualified and appointed INTERSOS staff member. Visitors are not allowed to spend time with or have access to children without supervision.
- INTERSOS and INTERSOS partners' personnel must never disclose information that identifies children or their families to any unauthorised person, or make such information available to the general public. In the case this may be necessary, a written informed consent of the child or his/her parent/legal guardian/caregiver must be gathered, and the need to disclose identifying information discussed with the HOM prior to submitting any request of consent.
- For interviews with children, visitors will be required to gain a written informed consent of the child or his/her parent/legal guardian/caregiver. Children aged above 15 years⁵ can give their consent directly, but it is always preferable to seek the consent of the parent/legal guardian/caregiver when not against the best interests of the child or the child's will (see Annex 7: Informed Consent for Communication).

If a visitor is found in breach of the Global CP Policy standards of behaviour, INTERSOS reserves the right to suspend or terminate the visit, and handle the case in accordance with the established procedures.

Safe programming

All INTERSOS programmes and activities need to be designed and implemented to minimise actual or potential risks of harm to the children they come into contact with or impact upon directly or indirectly. INTERSOS is committed to designing and implementing programmes and activities that:

- Adhere to the principles and standards outlined in the Minimum Standards for Child Protection in Humanitarian Action (CPMS, 2012).
- Ensure children safety by identifying CP risks which may be related to the context or the specificity of the programmes and activities themselves, and taking all necessary mitigation measures that account of the impact (intended or unintended) on the children and communities engaged.

⁵ Or to be adapted according to the national legislation.

- Support children and communities affected by child abuse, neglect, exploitation and violence to access safe services in a timely manner, and support their physical, emotional and psychosocial recovery.

Child-safe programming considerations need to be mainstreamed throughout the programme cycle phases: assessment, planning, resource mobilization, implementation and evaluation.

- It will be the responsibility of the INTERSOS Regional Directors and Heads of Mission to integrate child protection situation analyses into the strategic direction and design of the country programmes and projects. This includes conducting CP risk analyses and elaborate CP mitigation strategies which take into consideration the child protection concerns identified at the country level. This process should include categorization of interventions and implementation modalities by risk significance level.
- It will be the responsibility of the INTERSOS Regional Directors, Heads of Mission and Programme Managers to integrate child protection considerations into the design of needs assessment and new project proposals, including identification of activity-specific CP risks and related CP mitigation measures.
- It will be the responsibility of the INTERSOS Heads of Mission, Programme Managers and Project Managers to work in culturally sensitive ways to address child rights and encourage children participation in decisions that affect their lives, including participation in the design, monitoring and evaluation of INTERSOS activities.
- It will be the responsibility of the INTERSOS Heads of Mission, Programme Managers and Project Managers to intentionally plan how to positively impact the most vulnerable children and develop plans to strengthen local organisations to become more child-safe.
- It will be the responsibility of the INTERSOS Programme Managers and Project Managers for all sectors to undertake review of on-going projects in order to ensure that activity-specific CP risks are taken into consideration and related CP mitigation measures developed.
- It will be the responsibility of the INTERSOS Programme Managers and Project Managers for all sectors to ensure that the CP mitigation measures designed are put into practice during the project implementation.
- It will be the responsibility of the INTERSOS Programme Managers and Project Managers for all sectors to monitor and regularly review the effectiveness of the CP mitigation measures designed, and report about any challenge faced in implementation.

The INTERSOS Country Protection Coordinators, Regional Protection Advisors and Global Protection Advisor will be responsible for technically supporting both the design and the implementation of child-safe programmes and activities.

Design and implementation of child protection projects:

When designing child protection projects, it should be weighed the capacity of the Organisation to implement activities adhering to child protection principles and safeguarding children participating in the project, and the ability of the Organisation to conduct the activities against the potential security implications for INTERSOS to engage conducting such project (including threat to reputation). Where there is an on-going child protection project, if the security situation changes, INTERSOS reserves the right to halt programme activities and return funds to the donor when implementation put at risk the security of INTERSOS personnel or operations.

Promotion of child survival and development:

To promote child survival and development, INTERSOS will integrate child protection across programming, however. INTERSOS conducts child-specific activities especially with specific groups of vulnerable children. Therefore, INTERSOS commits to the following:

i. Children's care and development:

INTERSOS recognises that the maintenance of family unity and the reunification of families have been established as a priority in international law. Utilising the Alternative Care in Emergency Settings Toolkit (2013) as reference, INTERSOS commits to:

- Prioritise family reunification. Interim care and durable solutions will be secondary options based on assessment of the best interests of the child. The ability of INTERSOS to provide direct support for children within interim care will be weighed against the potential security implications for INTERSOS (including threat to reputation). Where direct provision of interim care is not possible, INTERSOS will work to determine the possible options as part of a BID process.
- Where interim care may be required, put in place special measures when engaging children who are living in interim or durable alternative care arrangements. INTERSOS will always favour family-based care over institutions. INTERSOS only works with children outside alternative family-based care on a temporary basis and in circumstances which prohibit placement in family-based care (such as those with serious behaviour or safety concerns).
- Support alternative durable solutions for children in institutional interim care settings by providing qualified child protection case management services and continuous support for caregivers providing family-based care.
- Integrate into programming working directly with children, their caregivers and communities to promote understanding of and community-based childhood development, child rights and child protection including through the establishment and support of community committees on child protection and child rights clubs.

ii. Activities directly involving children:

INTERSOS works with children who are separated or unaccompanied from their parents or original caregivers (UASC⁶), as well as conducting activities directly with children in schools, child-friendly spaces and other activities outside of parental or caregiver supervision. INTERSOS has a duty of care towards these children and their communities. Utilising international best practices as reference, including the Minimum Standards for Child Protection in Humanitarian Action (CPMS, 2012) and the Inter-agency Network for Education in Emergencies Minimum Standards (INEE MS, 2010), INTERSOS commits to:

- Develop activity-specific risk mitigation strategies, standards of behaviour and SOPs for those directly interacting with children.
- Where operating interim institutional care arrangements and/or working with foster families, develop before implementation specific child safeguarding SOPs based on international best practices, and review them during implementation on a quarterly basis.
- For activities directly involving children's interaction with other children, adopt child-to-child behavioural code of conduct and measures on anti-bullying and prevention of sexual exploitation and abuse.

Safe communication

INTERSOS has a duty of care towards the children with whom it comes in contact and at all times must put their best interests first. Children have the right to be accurately represented and INTERSOS accepts its responsibility not to portray a manipulated or sensationalized image of a child's well-being and circumstances. Children must be presented as human beings with their own identity and dignity preserved.

All INTERSOS personnel and associates need to be aware that photos and other identifying details of children and their families represent a risk to their safety and dignity, particularly in conflict and post-conflict situations. The "Do No Harm" principle must guide the collection and use of images and information about children and their families.

All INTERSOS personnel and associates are obliged to adhere to the following standards of behaviour when recording and using images and stories of children and their families:

- Ensure when making images of children and their families (photos, video, etc.) that they are respectful, that people are adequately clothed and that sexually suggestive poses are avoided.
- Choose images and related messages based on values of respect and equality. Images should represent a broad range of children – boys and girls, and various ages, abilities and origin -and not present them as victims.

6 Although jointly included in this UASC definition, we should differentiate between Unaccompanied Children who are children separated from both parents and other relatives and are not being cared for by an adult, and Separated Children who are children separated from both parents, or from their previous legal or customary primary caregiver, but not necessarily from other relatives. Separated Children therefore may include children accompanied by other adult family members and they might need support to strength this arrangement.



- Truthfully represent the particular situation both in its immediate and wider context.
- Avoid approaches that potentially stereotype or sensationalise people, situations or places.
- Ensure that people whose situation is being represented have the opportunity to communicate their stories themselves.
- Conform to the highest standards of children's rights (UNCRC) and encourage children to give their own accounts as much as possible, rather than letting others speak on their behalf.
- Take and use images and stories only with the full understanding and permission of the child or his/her parent/legal guardian/caregiver. The informed consent needs to be signed (or verbally agreed to) and filed in a secure location (see Annex 7: Informed Consent for Communication). No image and/or story where children and their families are identifiable can be made public through the INTERSOS website or other means without the informed consent or assent of the subjects.
- Change the names of the subjects to protect their identity, unless they have explicitly stated a preference that their genuine name should be used, and security implications are not a factor.
- Do not disclose personal information (such as location) which could put children and their families at risk on the INTERSOS website or in public literature.
- Report in a timely manner any complaint or concern about inappropriate or intrusive images through the same procedures as for reporting child protection concerns.

Social media – e.g. blogs, facebook or twitter entries - generated by INTERSOS are subject to the same safe communication practices as outlined above.

All media folders and photographs need to be stored in a secure area to which a limited number of people have access on need basis. Disclosure of these photographs to the INTERSOS Communication and Fundraising Unit at HQ or third parties can be made only with approval of the HOM. Questionable photographs will be referred to confirm with the Country Protection Coordinator, Regional Protection Advisor or Global Protection Advisor for clearance prior to being placed on the INTERSOS database or disclosed with third parties. In certain specific activities (such as IDTR), images may be necessary for the purposes of verification and photographs may play an important part of the process for young children (aged under 5 years) and those children with insufficient information for tracing; these photographs can be disclosed only on approval by the Project Manager in charge.

Complaint Mechanisms

Each INTERSOS Country Mission will be responsible to ensure that complaint mechanisms for reporting child protection concerns are developed and integrated within complaint and feedback structures existing at the base and country level. In order to be accessible and effective:

- Complaint mechanisms for reporting child protection concerns should be developed and regularly reviewed with the involvement of children, caregivers and communities, based on Humanitarian Accountability Partnership (HAP) Standard in Accountability and Quality Management (2010).
- Complaint mechanisms for reporting child protection concerns should have multiple entry points, allowing individuals the opportunity to report at the organisational level or at the community level.
- Complaint mechanisms for reporting child protection concerns should blend both formal and informal community structures, where individuals are able and encouraged to safely report child protection incidents.
- Children, their caregivers and their communities need to be aware of children's rights to protection from abuse, neglect, exploitation and violence, and INTERSOS zero tolerance towards child harm.
- Children, their caregivers and their communities need to be enabled to recognise inappropriate behaviour by INTERSOS staffs and others.
- Children, their caregivers and their communities need to be aware of the existing complaint mechanisms for reporting child protection concerns and know how to access them.

Awareness amongst children, caregivers and communities needs to be raised in a manner which is age, gender and diversity sensitive, and language appropriate.

In-country CP Focal Point and Referent

Each INTERSOS Country Mission will be responsible to identify among the mission staffs at least one CP Focal Point who will be the person designated to receive complaints and reports about alleged acts of child harm involving INTERSOS personnel or associates, or other humanitarian aid workers, in the field. Where appropriate, a CP Focal Point can be identified for each country office/base. The in-country CP FP(s) must commit to the TORs for the role (see Annex 8: In-Country CP Focal Point Terms of Reference) and meet the following minimum requirements:

- Basic knowledge and understanding of protection, and specifically child protection, fundamental concepts and guiding principles;
- Medium to senior level national staff;
- Fluent in English;
- Demonstrated sensitivity to cultural diversity and gender issues;
- Demonstrated experience of working directly with affected/local communities;
- Proven integrity, objectivity and professional competence;
- Proven communication skills;
- Have enough time to dedicate to the role.

Since the in-country CP FP(s) should be person(s) the other mission staffs trust, it is advisable to involve all staffs in the identification, while the senior management team (including the Head of Mission and the Country Protection Coordinator where present) must guarantee that the person(s) identified to cover the role meet the minimum requirements as outlined above. All mission personnel and partners, as well as target children and communities, needs to be properly and widely informed of the role and identity of the in-country CP FP(s), and know how to contact them.

Upon appointment, the in-country CP FP(s) will undergo specific and systematized training on child protection.

The in-country CP FP(s) will perform their tasks with the support and under the supervision of the in-country CP Referent who needs to be appointed by the senior management team among the mission protection staffs. The in-country CP Referent must commit the TORs for the role (see Annex 9: In-Country CP Referent Terms of Reference) and meet the following minimum requirements:

- In-depth knowledge and understanding of protection, and specifically child protection, fundamental concepts and guiding principles;
- Senior level international or national staff (if possible, Coordinator or Manager);
- Fluent in English;
- Demonstrated sensitivity to cultural diversity and gender issues;
- Demonstrated experience of working directly with affected/local communities;
- Proven integrity, objectivity and professional competence;
- Proven communication skills;
- Have enough time to dedicate to the role.

Where there is no senior level protection staff within the mission, the in-country CP Referent role needs to be covered by the HOM who will perform the related tasks with the support of the Regional Protection Advisor or Global Protection Advisor.

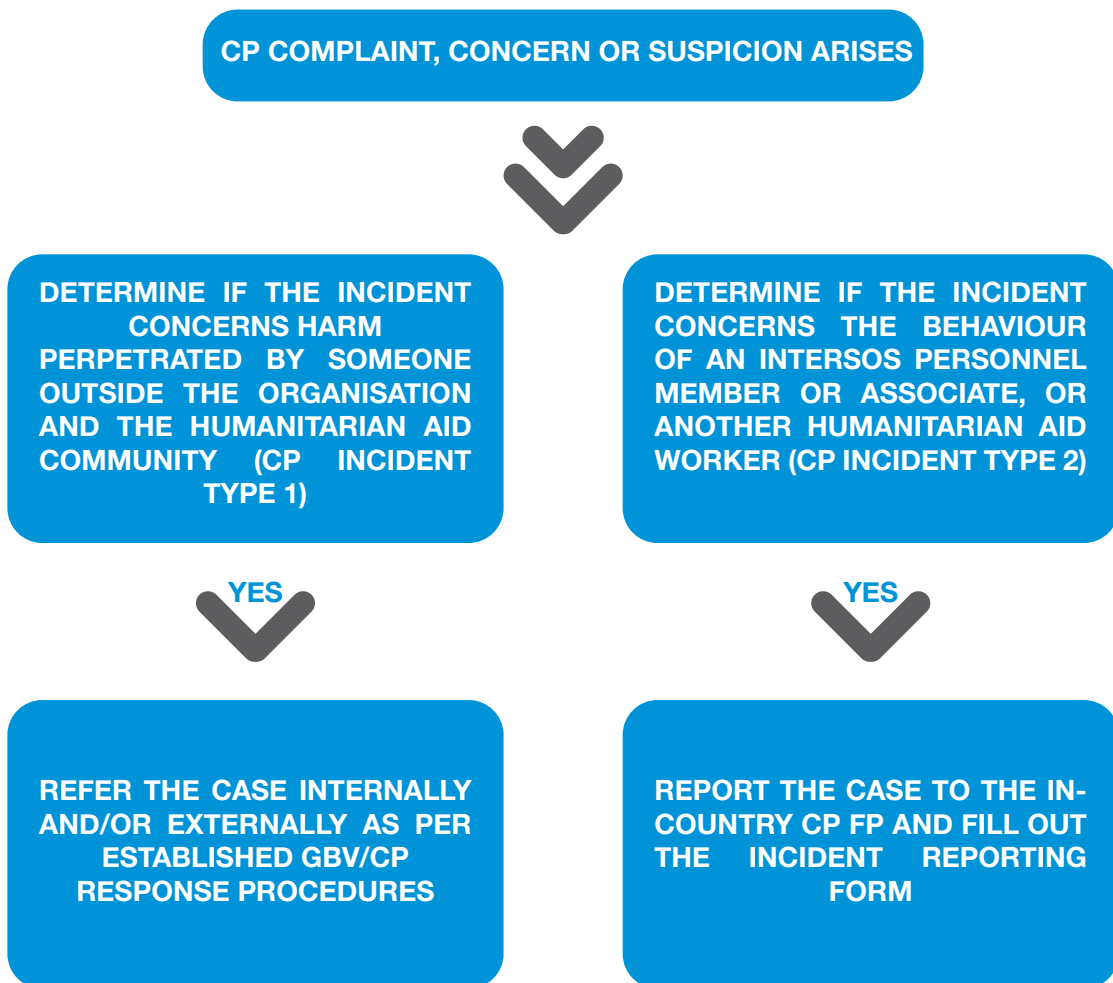
Reporting procedures

INTERSOS recognises that children are, by nature, vulnerable to harm and this is particularly the case in humanitarian contexts. It is therefore essential that all INTERSOS personnel and partners, as well as target children and communities, understand that:

- Child harm may be committed by staffs, volunteers, community committee members, interns or consultants within INTERSOS, INTERSOS partners or other INTERSOS associates;
- Child harm may be committed by other humanitarian aid workers.
- Child harm may be committed by authorities or leaders.

- Child harm may occur within families, communities, institutions or other care arrangements.
- Children and young people may also be perpetrators of harm against other children.

When there is a complaint, concern or suspicion of harm perpetrated against a child who benefits from INTERSOS programmes or a child who is not involved in INTERSOS activities, this needs to be handled in accordance with the procedures illustrated in the flowchart below.



When alleged acts of child harm involve INTERSOS personnel or associates, or other humanitarian aid workers:

- The complainant must report the case to the in-country CP FP or his/her alternate within 24 hours from when the complaint, concern or suspicion arises.
- The complainant must fill out the Incident Reporting Form as soon as possible and submit it to the in-country CP FP or his/her alternate (see Annex 10: Incident Reporting Form).

For cases where he/she wishes to remain anonymous, the informant can use the complaint mechanisms for reporting child protection concerns existing at the base or country level.

It is **MANDATORY** for all INTERSOS personnel to handle complaints, concerns or suspicions of child harm (whether physical, emotional, sexual or other) in accordance with the established procedures. This includes acts or omissions resulting in placing a child at risk of harm, or an act of harm itself. When an INTERSOS personnel member is aware of a CP incident involving INTERSOS personnel or associates, or other humanitarian aid workers, and fails to report it, he/she may be subject to disciplinary action, up to and including dismissal.

Any intentionally false, malicious or vexatious statement, misrepresentation or accusation against another INTERSOS personnel member or third party will also be considered serious misconduct.

Confidentiality and data protection

Confidentiality of information is extremely important when working with children and needs to be addressed with the utmost care. It is essential that all INTERSOS personnel and associates understand the importance of this principle and ensure that the data protection and sharing protocols outlined below are adhered to. Any breach of the data protection and sharing protocols may be subject to disciplinary action, up to and including dismissal.

Each INTERSOS Country Mission will be responsible to develop a data protection system for recording, storing and sharing data related to children, and protect information, at the base and country level (see Annex 11: Data Protection Checklist).

The following protocols need to be observed when handling data related to children (including case files, photos and other personal details):

- Data will not be shared with any unauthorised person and will never reveal the identity or identifying features of children.
- When coordinating with other actors or entering data into information management systems such as the GBVIMS or IACPIMS, data will be safeguarded, accessed and shared only by staffs trained on data sharing protocols and relevant SOPs. This includes the sharing of incident reports, trends analyses and referral pathways.
- For the purposes of case management meetings or other inter-agency support mechanisms, information about an individual child may be discussed but identifying information (including the name of the child) will NOT be disclosed to other agencies, organisations or government bodies. In exceptional circumstances, information can be shared according to a signed Information Sharing Protocol (ISP) and corresponding data protection protocols with UNHCR, UNICEF or other INTERSOS donors, especially when the child is a refugee for resettlement purposes.
- Where data needs to be shared for a specific purpose (such as IDTR), authorisation must be sought from the Project Manager in charge before such information is shared. Data should only be shared on a need-to-know basis.



- Images of children will not be shared with other agencies, organisations, government bodies or families unless it is determined by the Project Manager in charge to be necessary for the specific CP case. Images will not be stored or entered into the IACPIMS unless it is deemed essential for tracing purposes.
- When children disclose personal information to INTERSOS personnel, it is essential that INTERSOS personnel understand that this information may be sensitive and ensure that such information is shared only on a need-to-know basis and in the best interests of the child.
- Information regarding children will only be shared with partners on a need-to-know basis and in the best interest of the child.
- Information related to CP incidents involving INTERSOS personnel or associates, or other humanitarian aid workers, are particularly sensitive and will be shared only with the in-country CP FP or his/her alternate who will take over the case and inform immediately the in-country CP Referent to discuss the way forward.

All materials pertaining to complaints and reports about alleged acts of child harm involving INTERSOS personnel or associates, or other humanitarian aid workers, will be handled in strict confidence in order to protect the rights of all involved. However, such complaints and reports may be used, where necessary, for action taken pursuant to Section 5.10 Response procedures below.

Response Procedures

Interviews with children:

The in-country CP FP(s) and their alternate(s), as well as other staffs engaged in interviews with children, need to be properly trained by qualified staffs on child-friendly interviewing techniques and methodologies before conducting interviews with children. Repeated interviews with children can contribute to a child's trauma. Therefore, coordination must be maintained with all other stakeholders to avoid duplication of interviews with an individual child. Furthermore, the following protocols need to be observed when interviewing children:

- Children will be told of the purpose of the interview and informed consent must be sought before the interview is conducted.
- Interviewers will ensure that children feel safe at all times.
- Interviews will not be conducted in any space where it may create suspicion amongst outsiders (including authorities, community members, other children, etc.).
- Interviewers will, wherever possible, sit at the same level as the child when conducting the interview.
- All efforts will be made to ensure that children do not feel exposed or vulnerable during the interview.
- Interviewing techniques and methodologies should be age- and gender-appropriate.
- As much as possible, follow-up interviews/discussions will be conducted by the same interviewer.

- Where there are child protection concerns, the child will be informed of all possible steps and must.
- Interviewers should be involved in the decision making for urgent child protection cases.
- At all times, interviewers must ensure the “Do No Harm” principle is adhered to.

Referral of CP Cases for Assistance:

INTERSOS will provide assistance to any child involved in its programmes in order to protect them from further harm where it is within the mandate, capacity and ability of the Organisation to do so. Identified cases of CP need to be referred immediately to internal and/or external GBV/CP specialized services as per GBV/CP response procedures established at the base or country level, ensuring that child protection guiding principles are adhered to, including the best interests of the child, and informed consent or assent. Information is to be shared only on a need-to-know basis with the service provider, and the safety of the child and others involved paramount.

Where INTERSOS Country Missions and partners are not engaged in providing directly GBV/CP case management services, adequate mechanisms need to be established in order to guarantee that cases of CP are provided with timely and appropriate access to comprehensive assistance and care. Each INTERSOS Country Mission will be responsible to ensure that GBV/CP referral pathways and related SOPs are operational and regularly updated in each country office/base in accordance with the standard Inter-Agency Child Protection and Gender- Based Violence SOP Guidance, and the following steps:

- Identify GBV/CP case management services provided by different agencies, organisations or structures at the base and country level.
- Agree on SOPs for case referral with each agency, organisation and structure that INTERSOS will refer cases to.
- Display the local referral SOPs in each country office/base. If security considerations do not allow the display of this information publically, the local referral SOPs can be kept with pertinent staffs, including the in-country CP FP(s) and their alternate(s).
- Update the information in the local referral SOPs for each country office/base at minimum on a bi-annual basis.
- Ensure that agencies, organisations and structures that INTERSOS refers cases to, act according to child protection guiding principles. In line with the “Do No Harm” principle, where there are serious concerns related to meeting standards of care and relevant guiding principles, INTERSOS should seek an alternative service solution based.

Pertinent staffs need to be trained on safe and ethical referral, as well as the established referral pathways and related SOPs.

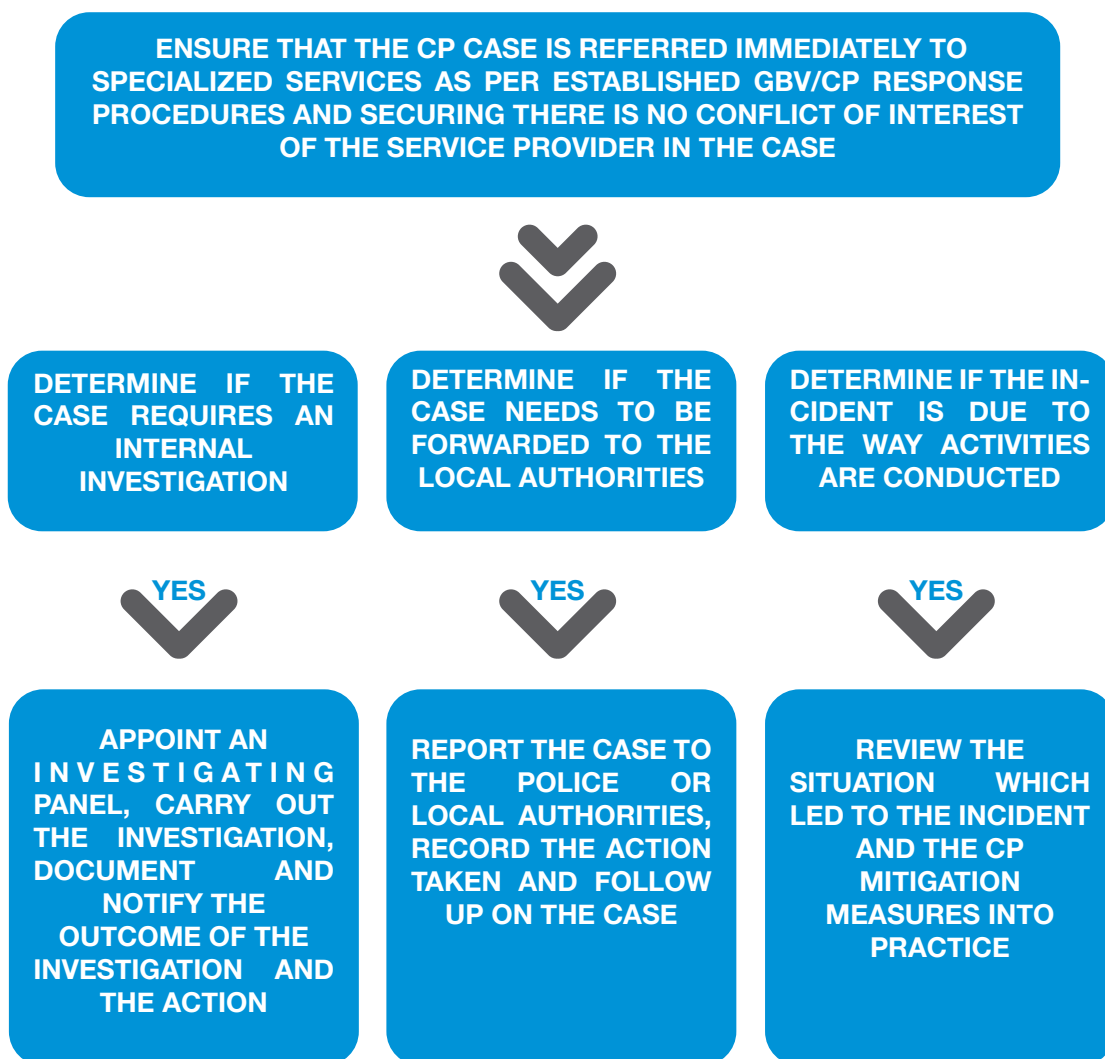
When CP incidents involve INTERSOS personnel or associates, considering that INTERSOS or INTERSOS partner’s case management team may know the alleged perpetrator, referral to a

third party service provider is recommended even if INTERSOS or one of its partners provide directly GBV/CP case management services.

The in-country CP FP will be responsible to follow-up on the case together with the specialized case management team (internal or external), record action taken and support provided, keeping the in-country CP Referent up to date.

Investigation into CP Incidents:

When a case of CP is determined as alleged CP Incident Type 2, this needs to be handled in accordance with the procedures illustrated in the flowchart below.



- The in-country CP Referent will inform the HOM and the HQ CP FP within 24 hours from when the incident is reported.
- The personnel member(s) involved will be immediately suspended on full pay and cease contact with children until all investigations are completed. In the event of an

allegation that involves a criminal offence, the subject of the complaint will be informed that, in addition to disciplinary action, the case may be forwarded to the appropriate local authorities for further investigation.

- An initial clarification will be conducted by the in-country CP FP, the in-country CP Referent and the HOM (the HQ CP FP will allocate an independent investigator where one of these is implicated) who will record all information, investigate the facts and assess the condition of the child (or children) within 48 hours, where possible.
- If the outcome of the initial clarification requires a full investigation, a panel composed by three members will be convened to carry out the investigation and determine whether the case is to be forwarded to the local authorities. The members of the investigating panel will commit to strict confidentiality (see Annex 12: Oath of Confidentiality for Investigators), information will be limited to those involved in the investigation and documentation will be filed securely as per data protection protocols. The investigating panel will report to the CP Policy Steering Committee. All members of the CP Policy Steering Committee who will be reviewing the case will also commit to strict confidentiality by signing the Oath of Confidentiality for Investigators.
- If the incident involves a personnel member of an INTERSOS partner, then the HOM will raise the issue with the relevant person within the partner organisation that must report back on how they are investigating and following up the case. It will be the responsibility of the INTERSOS Heads of Mission and in-country CP Referent to monitor this.
- If the incident involves another humanitarian aid worker outside INTERSOS and INTERSOS partners, then the HOM will raise the issue with the relevant person within the entity the alleged perpetrator work for.
- If any INTERSOS personnel member or associate is found to have violated the Global CP Policy and related standards of behaviour, immediate action will be taken. This may include:
 - » Staffs – disciplinary action, up to and including dismissal. International staffs will be repatriated to their country of origin and police reports may be filed.
 - » Volunteers, community committee members and interns – termination of the collaboration with INTERSOS.
 - » Consultants – termination of the collaboration contract with INTERSOS.
 - » Partners – if the child protection concern is mishandled, withdrawal of funding/ support and termination of the partnership agreement or sub-agreement with INTERSOS. Depending on the type of child protection concern, the instance may be reported to the UN Risk Management Unit.
 - » Contractors – termination of the contractual agreement with INTERSOS.
 - » Visitors – suspension of the visit and repatriation to their country of origin.

- For all categories of INTERSOS personnel and associates, the case may be forwarded to the police or local authorities for prosecution where possible criminal acts have been committed. Where the local authorities are not functional or reporting is against the best interests of the child (especially given safety concerns), a locally available solution based on child protection guiding principle should be determined with community involvement or utilising alternative interim care option.
- The outcome of the investigation and the action taken will be recorded and stored as per data protection protocols.
- Adverse determination from an investigation should be open to challenge through an appeals process which will follow the right to appeal procedure contained within INTERSOS Grievance and Disciplinary Policy.
- All parties concerned will be notified of INTERSOS processes, the outcome of the investigation and the action taken in a timely manner.
- The media will be dealt with by the INTERSOS Heads of Mission and Communication and Fundraising Unit at HQ, guided in their response at all times by the INTERSOS Secretary General.
- A review of the CP risks identified and the CP mitigation measures designed will be conducted, and new action set to further minimise the risks of harm to children by INTERSOS personnel and associates. This process need to be conducted and documented within 2 weeks of the end of the investigation.
- A final report about the investigation and the action taken will be submitted to the CP Policy Steering Committee.

Disclosure of information about CP incidents:

- When children disclose personal information to INTERSOS personnel, it is essential that INTERSOS personnel understand that this information may be sensitive and ensure that such information is shared only on a need-to-know basis and in the best interests of the child.
- While INTERSOS maintains appropriate confidentiality for individuals involved in CP incidents, INTERSOS may disclose information about incidents as required by national laws to report criminal cases.

Implementation and Review

In order to successfully implement and adhere to the Global CP Policy, each INTERSOS Country Mission is required to:

- Develop a country-specific CP strategy and related SOPs which contextualise the Global CP Policy and include CP risk analyses, CP mitigation strategies and adherence to national laws without diluting the Global CP Policy principles and standards of behaviour (See Annex 13: Checklist for Country-Specific CP Strategies).
- Develop a country-specific annual implementation plan and mobilise the necessary resources for implementation.
- Disseminate the Global CP Policy, including providing full and summary copies to personnel, partners, beneficiaries and target communities, and translating into local languages, creating a child-friendly version and publicly posting the Global CP Policy commitments and related standards of behaviour in all operational offices/bases.
- Quarterly report about progress on implementation, as well as any challenge faced and capacity support required, to the CP Policy Steering Committee.
- Revise the country-specific CP strategy and related SOPs on an annual basis.

The CP Policy Steering Committee is required to:

- Develop an annual implementation plan at the HQ level.
- Support the INTERSOS Country Missions to implement and adhere to the Global CP Policy.
- Monitor and quarterly report about progress on implementation to the INTERSOS Board of Directors and Secretary General.
- Provide oversight and management support for alleged CP Incidents Type 2.
- Revise the Global CP Policy on an annual basis.



RESOURCES AND ANNEXES

Annex 1: Abstract of the INTERSOS Global CP Policy

Our values, principles and beliefs:

INTERSOS Charter of Values states that INTERSOS is committed to **non-discrimination** (“working without borders”), **impartiality** (need-based assistance free from political, religious or social distinctions), **solidarity, transparency, sensitivity to local cultures**, promoting **human dignity, participation** and **dialogue**.

INTERSOS Charter of Values and Code of Ethics guide our commitment to child protection based on the principles within the United Nations Convention on the Rights of the Child (UNCRC). All INTERSOS personnel and associates must uphold and promote the highest standards of ethical and professional conduct, and abide by INTERSOS policies. This policy is based on affirming the responsibility of INTERSOS Board of Directors, personnel and associates to promote the rights of children, protect children from all forms of harm and adhere to the minimum standards of protection for children.

INTERSOS recognises that all children have equal rights to protection from abuse, neglect, exploitation and violence, and that everyone has a responsibility to support the protection of children. We are therefore committed to the following:

i. Promoting survival and development of children:

As well as children’s right to life, right to protection from all forms of abuse, neglect, exploitation and violence, INTERSOS commits to identifying and taking concrete action to reduce the effects of the emergency and the response on the physical, psychological, emotional, cognitive, social and spiritual development of children. This includes family reunification, preventing family separation, promoting family-based environments, with interim care and durable solutions considered as secondary options based on the best interests of the child.

ii. Ensuring that all children in need benefit from INTERSOS programmes without discrimination:

INTERSOS is committed to provide support to children, families and communities without distinction of any kind, such as race, colour, ethnicity, religion, sexuality, language, age, disability, gender, sex, political or other opinion, family circumstances, health, marital status, birth or other status. INTERSOS recognises that emergencies often magnify existing differences and further marginalise those already at risk of discrimination. INTERSOS is committed to identifying and monitor existing and new patterns of discrimination and power, and tackle them in the response as part of its commitment to the “Do No Harm” principle. INTERSOS will also take special measures to ensure appropriate and adequate care is provided to children with disabilities, unaccompanied and separated children (UASC), child-headed households, children in conflict with the law, children associated with armed forces or armed groups (CAAFAG), and other marginalised groups.

iii. Encouraging and enabling child participation in all activities concerning children and their communities:

INTERSOS is committed to ensuring that girls and boys of different ages and abilities are given space and time to meaningfully participate. INTERSOS personnel and partners must be aware

of their own values, beliefs and assumptions about childhood and the roles of the child and the family, and avoid imposing these on children. They should enable developmentally appropriate ways of child participation, share power with children in decision making, and be sensitive to how children's participation can, when done poorly, upset children's social roles and exposure to harm.

iv. Ensuring that the best interests of the child are paramount:

In all actions concerning children, the best interests of the child will be a primary consideration. This principle should guide the design, monitoring, and adjustment of all humanitarian programmes and interventions. Where INTERSOS takes decisions regarding individual children, this needs to be based on the Best Interest Determination (BID) process.

v. Promoting sensitivity to local culture and adherence to the UNCRC:

INTERSOS is committed to respecting local customs and culture, whilst at the same time honouring and promoting the fundamental rights belonging to children as enshrined in the UNCRC. INTERSOS will consistently recognise children as those under the age of 18 years, even if the legal age of majority is at a lower age. INTERSOS will work to protect children from traditionally sanctioned forms of child harm, such as corporal punishment, Female Genital Mutilation (FGM) and early marriage.

Key definitions:

Child: Any person below the age of 18 years. The United Nations Convention on the Rights of the Child (UNCRC) defines a 'child' as "every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier" (1989, Article 1). While INTERSOS respects and adheres to national laws in countries of operations, this policy does not define a child based on the legal age of majority. The Committee on the Rights of the Child, the monitoring body for the Convention, has encouraged States to review the age of majority if it is set below 18 and to increase the level of protection for all children under 18.

Child Protection: "The prevention of and response to abuse, neglect, exploitation and violence against children"⁷. Child protection means safeguarding children from harm. Child protection is not the protection of all children's rights, which is the responsibility of everyone working with children, but refers instead to a subset of these rights.

7 Minimum Standards for Child Protection in Humanitarian Action, Child Protection Working Group (CPWG) (2012)

Our behaviour protocols:

The following specific standards of behaviour apply to all INTERSOS personnel - including staffs, volunteers, community committee members, interns and consultants - while under collaboration with INTERSOS and at all times, this includes both within working hours and outside of standard working hours:

- Promote child participation. Always listen to children, and encourage children and their families to be involved in making decisions relating to their lives.
- Promote non-discrimination. Treat children equally, irrespective of the child's or his/her parents' race, colour, ethnicity, religion, sexuality, language, age, disability, gender, sex, political or other opinion, family circumstances, health, marital status, birth or other status.
- Deliver aid assistance to children and communities in ways which do not abuse your position of power, trust and authority.
- Be aware that physically touching a child, perhaps to offer comfort, can be misconstrued by observers or the child.
- Avoid situations which isolate children and where your behaviour cannot be observed such as in cars, offices and homes.
- Where possible and practical, follow the 'two-adult' rule while conducting work, where two or more adults supervise all activities that involve children, and are visible and present at all times. If this rule is not possible in practice, seek alternatives such as being accompanied by community members or interacting in open spaces.
- Promote a culture of openness where issues and concerns can be raised, discussed among staffs, with children and communities.
- Ensure that all communications regarding children guarantee the protection, confidentiality, privacy, dignity and best interests of the child.
- Ensure when making images of children or their families (photos, video, etc.) that they are respectful, that people are adequately clothed and that sexually suggestive poses are avoided. No image where children and their families are identifiable can be made public through social media or other means without the informed consent or assent of the subjects (see Section 5.5 Safe communication).
- Report any child protection concern in a timely manner and in accordance with INTERSOS established reporting procedures (see Section 5.8 Reporting procedures). In the case where it is known or it is suspected that a child is at risk or suffering abuse, take urgent action to report and, where necessary, refer the child to appropriate services.
- Comply with child protection related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation.
- Challenge poor practices, and report potential risks which might lead to cause harm to children.

Moreover, INTERSOS personnel should never:

- Smack, hit or physically abuse children, whether as a form of discipline or otherwise.
- Engage in any form of sexual relations with children or beneficiaries.
- Engage in any form of inappropriate physical behaviour such as kissing, hugging or touching a child.
- Use inappropriate words, offensive, threatening or intimidating behaviours that shame, humiliate, belittle or degrade children or engage in emotional abuse.
- Act in a manner or organise activities which are abusive or place children at risk of abuse.
- Spend excessive time alone with a child excluding him/her from others.
- Stay alone with children in a room with the door closed and where you cannot be seen by other people, or invite a child / children to your place of residence.
- Develop abusive or exploitative relations with children, including hiring children for domestic or other labour.
- Condone or participate in activities where the child's behaviour is likely to lead to abusive or illegal acts.
- Discriminate through preferential treatment to a child (i.e. gifts, sponsorships, money, etc.).
- Use, download or buy pornography, or other photography or video, for sexual purposes.
- Take images of children (photos, video, etc.) which are detrimental or explicit and undermine the child's dignity.
- Share photos on social media, including facebook, instagram, twitter, etc. where children and/or their families are identifiable, as this could potentially put children at serious risk.
- At any time make comments to the media on child protection matters except where the Head of Mission has previously been made aware of media interest and agreed the response in advance.
- At any time breach confidentiality, informed consent or incident reporting procedures regarding a child protection incident or case.

All INTERSOS personnel are obliged to adhere to these standards of behaviour. Failure to comply with these standards or failure to report child protection concerns is grounds for disciplinary action. This action may include termination of contract or summary dismissal, and may result in the case being forward to the local authorities for criminal prosecution where appropriate and in accordance with applicable national laws.

The standards set out above are not intended to be an exhaustive list. Other types of inappropriate behaviour towards children may be grounds for disciplinary action pursuant to the INTERSOS Charter of Values and Code of Ethics. INTERSOS personnel must not engage in any form of humiliating, degrading or exploitative behaviour under any circumstances.

Acceptance of and compliance with these standards of behaviour is also a condition of every cooperative arrangements. INTERSOS will not enter into cooperative arrangements with entities or individuals – including contractors, partners and visitors – which utilise child labour according to the ILO Convention No. 138 on the minimum age for admission to employment and work (Version 1973), and do not commit to protecting children from harm.

Safe communication:

INTEROS has a duty of care towards the children with whom it comes in contact and at all times must put their best interests first. Children have the right to be accurately represented and INTERSOS accepts its responsibility not to portray a manipulated or sensationalized image of a child's well-being and circumstances. Children must be presented as human beings with their own identity and dignity preserved.

All INTERSOS personnel and associates need to be aware that photos and other identifying details of children and their families represent a risk to their safety and dignity, particularly in conflict and post-conflict situations. The “Do No Harm” principle must guide the collection and use of images and information about children and their families.

All INTERSOS personnel and associates are obliged to adhere to the following standards of behaviour when recording and using images and stories of children and their families:

- Ensure when making images of children and their families (photos, video, etc.) that they are respectful, that people are adequately clothed and that sexually suggestive poses are avoided.
- Choose images and related messages based on values of respect and equality. Images should represent a broad range of children – boys and girls, and various ages, abilities and origin -and not present them as victims.
- Truthfully represent the particular situation both in its immediate and wider context.
- Avoid approaches that potentially stereotype or sensationalise people, situations or places.
- Ensure that people whose situation is being represented have the opportunity to communicate their stories themselves.
- Conform to the highest standards of children's rights (UNCRC) and encourage children to give their own accounts as much as possible, rather than letting others speak on their behalf.
- Take and use images and stories only with the full understanding and permission of the child or his/her parent/legal guardian/caregiver. The informed consent needs to be signed (or verbally agreed to) and filed in a secure location. No image and/or story where children and their families are identifiable can be made public through the INTERSOS website or other means without the informed consent or assent of the subjects.

- Change the names of the subjects to protect their identity, unless they have explicitly stated a preference that their genuine name should be used, and security implications are not a factor.
- Do not disclose personal information (such as location) which could put children and their families at risk on the INTERSOS website or in public literature.
- Report in a timely manner any complaint or concern about inappropriate or intrusive images through the same procedures as for reporting child protection concerns.

Social media – e.g. blogs, facebook or twitter entries - generated by INTERSOS are subject to the same safe communication practices as outlined above.

Annex 2: Guidelines for Safer Recruitment

Suggested wording for job advertisements:

“The successful candidate will be expected to comply with the following as a condition of employment:

- a. Providing the name, position and contact information of at least two references, including the last line manager and excluding family members.
- b. Signing a personal declaration stating any criminal conviction, including spent convictions.
- c. Getting a satisfactory clearance through a criminal record check in the country of origin, where possible.
- d. Accepting and committing formally to the “INTERSOS Global Child Protection Policy and the INTERSOS Protection from Sexual Exploitation and Abuse Policy.”

Guidance on addressing CP and PSEA issues in interviews:

During the interview process, candidates should be asked about their awareness of and attitude towards CP and PSEA. Remember that abusers look completely ‘normal’, are often very skilled at deception, salesmanship and ‘grooming’ (of organisations, as well as children and individuals).

- All personnel who would be hired or employed to work directly with children and/or vulnerable individuals should be interviewed face-to-face or through skype using video link for at least one of the interviews, where possible.
- The interview panel should pay attention to and make a clarification of the following issues:
 - » Gaps in employment history, if the candidate worked for a protection-focused organisation before.
 - » Frequent changes of employment, if the candidate worked directly with children and/or vulnerable individuals before. Ask the reason for leaving.
- The following specific questions should be included in the HR interview:
 - » Are you aware of the INTERSOS Global CP and PSEA Policies? Considering the position you applied for, which are according to you the responsibilities you will have towards these policies?
 - » For positions dealing with children specifically:
When might it be appropriate and inappropriate to be alone with a child?
When and how might it be appropriate to comfort a child?
 - » Have you ever worked anywhere where colleagues were alleged of child abuse or SEA? If yes, what happened and how was the allegation handled? Would you have handled it differently yourself? If not, how would you handle a complaint, concern or suspicion of child abuse or SEA by a colleague?

- » For communication positions specifically: What sort of things might make a photograph of street children inappropriate for publication in the organisation's annual report? The interviewer should be looking for things like: if the children are not adequately clothed; if the photograph depicts prostituted children / children in conflict with the law their faces should be blurred and their names changed; if the photograph was taken without the children's permission; etc.
- » Is there anything we might find out during the reference check that you would like to talk about?
- During the HR interview, the candidate should be informed that:
 - » INTERSOS takes seriously all issues of protection, including CP and PSEA.
 - » References will be checked on any allegation of child abuse or SEA.
 - » If successful, the candidate will be required to sign up to the INTERSOS Global CP and PSEA Policies.
- The following warning signs should be taken into consideration (including, but not limited to and based on common sense):
 - » Strange or inappropriate questions / statements about children and/or women
 - » Interest in spending time alone with children / in working with children of a particular age or gender.

Guidance on addressing CP and PSEA issues in reference checks:

For positions dealing with children and/or vulnerable individuals, where possible it is advisable to speak directly by phone to references to ask questions related to CP and PSEA. In this case, notes of the reference's comments should be taken and placed on the personal file of the candidate.

In all cases, the reference check will be an integral part of the recruitment process. References should be asked about their relationship with the candidate – this has often revealed that the reference only has a small amount of knowledge about the candidate – and the following specific questions:

- » Do you know of any issue or incident involving the candidate and his/her contact with children?
- » Do you know of any SEA issue or incident involving the candidate?
- » Do you know of any dismissal or pending investigation into the candidate's behavioural misconduct?
- » What is your opinion on the suitability of the candidate to have direct contact with children and/or vulnerable individuals?

References should also be asked to confirm that there are no child abuse or SEA investigations pending or validated regarding the candidate they are aware of.

Guidance on conducting criminal record checks before formalising collaboration:

Different countries have different procedures for criminal record checks which should be updated by the HR Department for all areas of operations and the main countries that international staffs are recruited from. The declaration of criminal convictions should be used as a last resort where it is not possible to access a criminal record check in the candidate's country of origin.

Guidance on addressing CP and PSEA issues in internal performance reviews:

A category of performance regarding the "Adherence to Safeguarding Policies" should be included in both the Staff Performance and the Staff Self-Evaluation Forms. Specifically, the following aspects should be rated from 1 (performance at an insufficient level of effectiveness) to 5 (performance at an exceptionally high level of effectiveness) by both the supervisor and the staff member himself/herself:

- » Actively promotes the INTERSOS Global Child Protection Policy.
- » Actively promotes the INTERSOS Protection from Sexual Exploitation and Abuse Policy.
- » Adheres to and promotes safe communication practices.
- » Adheres to and promotes data protection and sharing protocols.

In the section "Overall Performance and Career Development" of the Staff Performance Form, the supervisor should also be asked to comment on the staff member's commitment to comply with and promote implementation of the safeguarding policies; while in the "Other Comments" section of the Staff Self-Evaluation Form, the staff member should be asked to describe what actions he/she has taken to promote the safeguarding policies, highlighting any gap or challenge faced in implementation and adherence to these policies.

Annex 3: Declaration of Criminal Convictions

Do you have any prosecution pending, or have you ever been convicted, bound over or cautioned by the police or received a formal reprimand or final warning for any offence, including road traffic offences?

Yes _____ No _____

If yes, please provide details, including those prosecutions or convictions considered spent, and declare any previous investigation or allegation made against you. These will be kept confidential by INTERSOS relevant staffs that will assess whether they pose any risk or not in relation to child protection or protection from sexual exploitation and abuse.

“I, the undersigned, hereby declare that the information I have provided is complete and true, and I understand that to make a false statement knowingly may result in termination of any agreement held between myself and INTERSOS”

Signature of the Employee/Collaborator: _____

Name of the Employee/Collaborator: _____

Date: _____

For INTERSOS:

Signature: _____

Name: _____

Date: _____

Annex 4: Declaration of Agreement to be Bound by and Uphold the INTERSOS Global CP Policy and the INTERSOS PSEA Policy for Personnel

I, the undersigned _____, hereby acknowledge that I have received, read and understood the INTERSOS Global Child Protection Policy and the INTERSOS Protection from Sexual Exploitation and Abuse Policy, and pledge to abide by the expectations and provisions therein.

I am fully aware that should I fail to comply with these policies and related standards of behaviour, I will be liable to suspension, summary dismissal and/or face legal implications commensurate to the offence/crime I will have committed.

I testify that I have no prior criminal record in any country related to child abuse or sexual exploitation and abuse, and I have never been involved in any form of child abuse or sexual exploitation and abuse before.

I commit to respect and promote implementation of these policies at all times while under collaboration with INTERSOS by the way I conduct myself and by reporting any violation of the related standards of behaviour that come to my knowledge.

To show my acceptance and commitment to comply with the INTERSOS Global Child Protection Policy and the INTERSOS Protection from Sexual Exploitation and Abuse Policy, I hereby sign this declaration form.

Signature: _____

Name: _____

Position: _____

Place: _____

Date: _____

Relationship with INTERSOS: _____

Relationship categories include:

- » Current Staff
- » Prospective Staff
- » Volunteer / Intern
- » Community Committee Member
- » Consultant
- » Other (specify)

Annex 5: Declaration of Agreement to be Bound by and Uphold the INTERSOS Global CP Policy for Partners

_____ (NAME OF THE ENTITY) hereby acknowledges that it has received and read a copy of the INTERSOS Global Child Protection (CP) Policy.

_____ (NAME OF THE ENTITY) agrees that all children have equal rights to protection from abuse, neglect, exploitation and violence, and that everyone has a responsibility to support the protection of children.

_____ (NAME OF THE ENTITY) accepts and commits to actively prevent acts of child harm by its personnel and associates, and to respond to child protection incidents that are perpetrated against children in compliance with the INTERSOS Global CP Policy.

_____ (NAME OF THE ENTITY) ensures that no personnel hired, deployed or engaged in projects implemented in partnership with INTERSOS or with the support of INTERSOS, have ever been involved in any form of abuse, neglect, exploitation and violence against children before.

_____ (NAME OF THE ENTITY) ensures that all personnel hired, deployed or engaged in projects implemented in partnership with INTERSOS or with the support of INTERSOS, will participate in trainings on the content of the INTERSOS Global CP Policy and related standards of conduct organised by INTERSOS.

_____ (NAME OF THE ENTITY) is fully aware to be liable to suspension or cancellation of the partnership agreement or sub-agreement with INTERSOS should any of its personnel member or associate be found in breach of the INTERSOS Global CP Policy standards of behaviour, and the concern be mishandled.

Signature:

Name:

Position:

Place:

Date:

On behalf of:

Signature:

Name:

Position:

Place:

Date:

On behalf of INTERSOS:

Annex 6: Declaration of Agreement to be Bound by and Uphold the INTERSOS Global CP Policy Standards of Behaviour for Visitors

I, the undersigned _____, hereby acknowledge that I have received, read and understood the abstract of the INTERSOS Global Child Protection (CP) Policy.

I declare that I have been briefed about and given every opportunity to discuss both the principles and the standards of behaviour contained therein with an INTERSOS representative.

I accept and commit to comply with these principles and standards of behaviour at all times while visiting INTERSOS and/or INTERSOS partners' programme activities.

I am fully aware that should I be found in breach of the INTERSOS Global CP Policy standards of behaviour, INTERSOS can take the initiative to suspend or terminate my visit, and forward the case to the police or local authorities for prosecution where possible criminal acts have been committed.

Signature:

Name:

Position:

Place:

Date:

Signature:

Name:

Position:

Place:

Date:

On behalf of INTERSOS:

Annex 7: Informed Consent for Communication

Definition: Informed consent is the voluntary agreement of an individual who has the capacity to give consent, and who exercises free power of choice. To provide “informed consent”, individuals must be able to understand and take a decision regarding their own situation.

Practice: Informed consent may be sought from an adult, a child or a child’s parent/legal guardian/caregiver, according to the age of the child and his/her level of maturity. As a guide, informed consent should be sought from the child when the child is deemed mature enough to understand. Usually 15-17 year olds should be able to give oral or written informed consent. For younger children, decisions should be made on a case-by- case basis.

If the interviewer decides that the child cannot fully understand the content of the informed consent, written informed consent should be sought from a parent, legal guardian or caregiver. In all cases, even for very young children (i.e. those aged under 5 years) efforts should be made to explain in simple language appropriate to the age why information is being sought and what it will be used for, including how it will be shared. This prevents potential conflict between the information collector and the informant.

Discussions to gain informed consent should generally detail: the purpose, nature, method and process of information collection; the role and rights of the informant; and the potential risks and benefits. It should also ensure the accuracy and confidentiality of the information. Consent can be obtained verbally or in written form, and should include the full name and signature (where possible) of the informant and the date (unless this information is kept separately for confidentiality reasons).

Informed Consent Form for Parents, Legal Guardians or Caregivers of Children Aged Under 15 Years being Interviewed

My name is _____ . I am willing to participate in talking to a person or a group of people from _____ (NAME OF THE ENTITY).

They may ask me about my experiences and feelings about my life, and I am willing to answer their questions if I feel comfortable to. I am allowed to refuse to answer some of the questions. I know that this person/group of people will record my photograph and my story in writing or using a voice recorder. I am happy for them to do this but I can change my mind and stop the recording when I feel uncomfortable at any time. I understand that I will not be identified in any way in reports or publicity.

I know that the information I will provide may be used for public purposes such as in local and international newspapers, books, websites and/or radio and television stations. I am comfortable about it, but I can change my mind after the talk if I think I do not want many people to know me.

I also know that this person/group of people will not use my real name or show my face when presenting my story to other people.

I know that there is no promise of any money or reward to be given to me. I am the one who has decided to allow or not to allow this person/group of people to talk to me.

Signature of the Informant

Date

I believe the information given to be correct and the informant consent genuine to the best of my knowledge.

Signature of the Interviewer

Date

The following is necessary if the consent form has to be read to the informant:

I certify that I have read this consent form in full to the informant whose signature appears above.

Signature of the Interviewer

Date

Informed Consent Form for Parents, Legal Guardians or Caregivers of Children Aged Under 15 Years being Interviewed

My name is _____ . I give permission for my child _____
_____ (NAME OF THE CHILD) to take part in the interview being
carried out by _____ (NAME OF THE INTERVIEWER) from
_____ (NAME OF THE ENTITY).

I have received a full explanation from the interviewer about the purposes of this interview, what my child may be expected to do during the interview and how the information will be used.

I understand that the interviewer will record my child's photograph and story in writing or using a voice recorder.

I understand that my child will not receive any money or reward as a result of taking part in the interview.

I also understand that if at any time I am not happy with my child taking part in the interview, I can withdraw my child from the interview process.

I certify that I am the parent, legal guardian or caregiver of the child named above.

Signature of the Parent/Legal Guardian/Caregiver Date

I believe the information given to be correct and the parent/legal guardian/caregiver consent genuine to the best of my knowledge.

Signature of the Interviewer Date

The following is necessary if the consent form has to be read to the parent/legal guardian/caregiver of the child:

I certify that I have read this consent form in full to the parent/legal guardian/caregiver whose signature appears above.

Signature of the Interviewer Date

Annex 8: In-Country CP Focal Point Terms of Reference

General purpose of the role:

With the support and under the supervision of the in-country CP Referent, the in-country CP Focal Point is designated to receive complaints and reports about alleged acts of child harm within his/her assigned geographical area of responsibility, and is in charge of ensuring proper and effective response in compliance with relevant guiding principles and the established procedures. Moreover, the in-country CP Focal Point is in charge of actively contributing to raise awareness on CP and revise the country-specific CP strategy and related SOPs.

Main responsibilities and tasks:

- Be the focal point for receiving complaints and reports about alleged acts of child harm involving INTERSOS personnel or associates, or other humanitarian aid workers, within his/her assigned geographical area of responsibility;
- Ensure that all materials pertaining to complaints and reports are handled in strict confidence, and in line with applicable grievance and complaint handling procedures;
- Take appropriate measures to ensure safety and protection for survivors, as well as alleged perpetrators and complainants if different from the survivors;
- Where the child or his/her parent/legal guardian/caregiver consents, refer immediately the case to internal and/or external available GBV/CP response mechanisms, so that survivors can receive the medical, psychosocial, legal and material support they need, or directly assist survivors to access immediate medical assistance where needed;
- Keep the in-country CP Referent up to date on the actions taken;
- Refer complaints and reports for investigation;
- Participate in investigations, ensuring there is no conflict of interest on the case and advising the investigating panel on actions which may be needed;
- Actively contribute to raising awareness on CP among INTERSOS personnel and associates (including newcomers), as well as target children and communities, with special focus on the internal procedures to raise complaints or report incidents of CP;
- Maintain relations and collaborates with the in-country CP Focal Points of other agencies or organisations so as to promote consistency among entities, and benefit from lessons learned and best practices;
- Act as the alternate of the in-country PSEA Focal Point within his/her assigned geographical area of responsibility;
- Provide inputs, suggestions for improvements and recommendations for future actions for the regular revision of the country-specific CP strategy and related SOPs.

I, the undersigned _____, hereby acknowledge that I have read, understood and agree to perform the role of in-country CP Focal Point in accordance with this terms of reference.

SIGNATURE: _____

DATE: _____

Annex 9: In-Country CP Referent Terms of Reference

General purpose of the role:

The in-country CP Referent is in charge of assisting the Head of Mission in ensuring the implementation of and adherence to the Global CP Policy within the country mission, with special focus on CP training and awareness. Moreover, the in-country CP Referent is in charge of supporting and supervising the in-country CP Focal Point(s) when there are complaints or reports about alleged acts of child harm to ensure proper and effective response in compliance with relevant guiding principles and the established procedures.

Main responsibilities and tasks:

- Support the development of the country-specific CP strategy and related SOPs, as well as the elaboration of the country-specific annual implementation plan and the identification of the necessary resources for implementation;
- Support the development of contextualised training and awareness materials on the content of the Global CP Policy and related standards of behaviour;
- Ensure that INTERSOS personnel and associates (including newcomers and partners), as well as target children and communities, are aware of what child harm is, INTERSOS zero tolerance towards child harm and the content of the Global CP Policy;
- Monitor and regularly review the effectiveness of the CP training and awareness materials and programmes;
- Ensure that accessible and effective complaint mechanisms for reporting child protection concerns are developed and integrated within existing complaint and feedback structures;
- Ensure that a data protection system for recording, storing and sharing data related to children is developed and observed;
- Ensure that adequate GBV/CP referral pathways and related SOPs are operational and regularly updated in each country office/base to guarantee that cases of CP are provided with timely and appropriate access to comprehensive assistance and care;
- Support and supervise the in-country CP Focal Point(s) when there are complaints or reports about alleged acts of child harm involving INTERSOS personnel or associates, or other humanitarian aid workers, to ensure proper and effective response in compliance with relevant guiding principles and the established procedures;
- Participate in investigations, and in CP Policy Steering Committee ad-hoc meetings as required;
- Support the regular revision of the country-specific CP strategy and related SOPs, as well as the regular revision of the Global CP Policy.

I, the undersigned _____, hereby acknowledge that I have read, understood and agree to perform the role of in-country CP Referent in accordance with this terms of reference.

SIGNATURE: _____

DATE: _____

Annex 10: Incident Reporting Form

If you have seen an actual incident or suspect and have cause for concern regarding an incident of child abuse or SEA, please follow the guidelines and fill out the questions below where appropriate. It is important that you identify in this form whether it is an actual incident or a suspected incident.

Personnel Member Details: Name: _____ Position: _____ Relationship with INTERSOS: _____ Line Manager/Supervisor: _____ Contact Details: _____	
Survivor Details: Name: _____ Sex: _____ Age: _____ Nationality: _____ Village/Town: _____ Municipality/District: _____ Governorate/Region: _____ Country: _____	Parent/Legal Guardian/Caregiver Details (only if the survivor is a child): Name: _____ Sex: _____ Age: _____ Nationality: _____ Relationship with the survivor: _____ Village/Town: _____ Municipality/District: _____ Governorate/Region: _____ Country: _____
Incident Details (please identify whether it is an actual incident or a suspected incident): Has the incident been seen or is the incident suspected? _____ Who disclosed the incident to you? _____ Date of the alleged incident: _____ Time of the alleged incident: _____ Location of the alleged incident: _____ Description of the alleged incident: _____ _____ Was there any other individual involved in the alleged incident? If so, who? _____ Was there any witness? If so, who? _____ _____	
Alleged Perpetrator Details: Name: _____ Sex: _____ Age: _____ Nationality: _____ Position: _____ Relationship with INTERSOS: _____	
Observations (physical injuries or other observations): _____ _____ _____	
Action Taken: _____ _____ _____	
SIGNATURE: _____ _____	
DATE: _____ _____	

Annex 11: Data Protection Checklist

This checklist should be used as an active document by all INTERSOS Country Missions to develop clear data protection protocols for each country office/base, and particularly when using protection-specific information management systems such as the GBVIMS and IACPIMS including with partners.

GENERAL DATA PROTECTION:

1. Data protection protocols have been put in place and an obligation to uphold these protocols has been included in the contract of staffs that will come into contact with the data.
Comments:
2. All staffs in contact with the data have a strong understanding of their sensitive nature, and the importance of data confidentiality and security.
Comments:
3. Staffs understand that all cases will be allocated a code based upon an agreed standard coding format, and that the code should be used to refer to the case either verbally or on paper, in place of any identifiable information such as name or date of birth.
Comments:
4. Protection Coordinators (or Managers) have provided staffs with culturally and contextually appropriate guidelines for obtaining informed consent from clients, including guidance on when a child can be judged to have the appropriate level of maturity to be able to give informed consent. Managers are satisfied that protection staffs have sufficient knowledge and skills in this area.
Comments:
5. Clients and/or their caregivers are giving their informed consent to gather and store their data before any information is recorded. Signed paper consent forms are being kept in a locked filing cabinet.
Comments:
6. Staffs are aware that when obtaining informed consent, clients may highlight particular information they do not want shared with certain people, and that this must be recorded and respected.
Comments:
7. Information is not being passed to a third party without the informed consent of clients and/or their caregivers.
Comments:
8. Managers make time on a regular basis for carrying out spot checks to make sure that all data protection protocols are being followed. Managers are accountable for data protection and management. Therefore, their performance objectives include a section on adequate measures in place to protect and manage data and information.
Comments:

9. Managers update and disseminate data protection protocols as soon as a situation/ context which could affect the security of the data changes e.g. a change in the governmental relations, deteriorating security situation, etc.

Comments:

PAPER FILE SECURITY:

10. Paper documentation for each incident is stored in its own individual file, clearly labeled with the incident number. Names of clients are NOT on the outside of the paper files.

Comments:

11. Paper files are being kept in a secure place, accessible only to responsible staffs specified by the Site Manager. No one else should be given independent access to the paper files without permission.

Comments:

12. Paper files are being transferred by hand between people responsible for the information (protection staffs designated by the Protection Coordinator). During transfer, the paper files should be stored in a sealed envelope.

Comments:

13. Protection staffs have reviewed paper files to ensure there are no original documents in the files. This is so that destruction of paper files can be done without any hesitation in the event of an emergency evacuation. If any original document is on file (such as original birth certificates, medical certificates, etc.), this should be scanned and then returned to the client or the appropriate agency/agencies.

Comments:

14. Rooms containing paper and electronic information are being locked securely when the staffs leave the room.

Comments:

15. Paper files and/or filing cabinet draws have been marked with a colour-coding system according to the sensitivity of the data they contain, and therefore the order of priority in which they should be removed / destroyed in the event of an emergency evacuation. For example, a piece of red tape across the front of a filing cabinet containing particularly sensitive information.

Comments:

ELECTRONIC DATA SECURITY:

16. Protection Coordinators determine that all computers being used for data storage are able to access anti-virus software and Site Managers ensure that anti-virus remains updated to avoid corruption and loss of information.

Comments:

17. Site Managers change the computers' password on a regular basis.

Comments:

18. Protection staffs are aware that information should be transferred by encrypted and password-protected files whether this is by internet or memory stick. During transfer, the files should be encrypted, password-protected, and erased immediately after transfer. Children Associated with Armed Forces and Armed Groups (CAAFAG) cases should not be recorded with other cases in the IACPIMS.

Comments:

19. At least two backups exist: one stored in the location of the database and backed up each day data are entered, and the second sent for secure storage in a designated off-site location (the database copy sent to the Protection Coordinator once every two weeks). Staffs responsible for the data at the second site must follow the same data protection protocols. The reason for having an off-site backup is so that the main database can be destroyed in the event of an emergency evacuation without this meaning the loss of all electronic data. Typically, the on-site backup is an external hard drive which is kept in a locked filing cabinet, and the off-site backup is done through emailing the database to the Protection Coordinator as an encrypted and password-protected zipped file.

Comments:

EMERGENCY EVACUATION:

In the event of an emergency evacuation, management must ensure that the computer(s) where the database is set up, its backup systems and the paper files are moved to a safe location. When moving database assets and paper files is not possible, management should ensure that electronic files are completely erased or the assets destroyed, and that paper files are shredded or burnt. The off-site electronic backup copy will then become the only source of information on the survivors.

20. A clear evacuation plan has been put in place, which includes a 'Scheme of Delegation' dictating who has responsibility for making decisions regarding removing or destroying data and who has responsibility for removing and destroying data (who has primary responsibility; who has responsibility if primary person is out of the office; who has responsibility if secondary person is out of the office, etc.).

Comments:

21. A briefing on the evacuation plan has been added to the standard induction checklist for relevant staffs. Typically, this is protection staffs, IT staffs, Security Manager, Logistics Manager, Senior Managers and Head of Mission.

Comments:

22. Managers have carried out an 'evacuation drill' to ensure that each individual knows its responsibilities and is able to act quickly in the event of an emergency evacuation.

Comments:

Annex 12: Oath of Confidentiality for Investigators

I, the undersigned, hereby commit myself to exercise the utmost discretion with regard to my involvement in the investigation being conducted by INTERSOS. I will hold secret all information known to me by reason of my activities on behalf of the investigating panel. I will not use such information for private gain, or to favour or prejudice any third party.

I understand that this declaration will remain in force after the completion of my assignment with the investigating panel. I also understand that divulging confidential information to persons who are not authorised to receive it may amount to misconduct, and that the signed original of this declaration will be held in the relevant investigation file.

Signature: _____
 Name: _____
 Position: _____
 Role: _____
 Place: _____
 Date: _____

To be filled out by an investigator before whom the oath of confidentiality is taken:

Case number (Country Code/Progressive Number): _____

Signature: _____
 Name: _____
 Position: _____
 Role: _____
 Place: _____
 Date: _____

Annex 13: Checklist for Country-Specific CP Strategies

International Guidelines:

Useful international guidelines include:

- Standards in Accountability and Quality Management, Humanitarian Accountability Partnership (HAP) (2010).
- Humanitarian Charter and Minimum Standards in Humanitarian Response, The Sphere Project (2011).
- Minimum Standards for Child Protection in Humanitarian Action, Child Protection Working Group (CPWG) (2012).
- Keeping Children Safe – Child Safeguarding Standards and how to implement them, Keeping Children Safe Coalition (2012).
- Alternative Care in Emergency Settings Toolkit (2013).
- Minimum Standards for Education – Preparedness, Response and Recovery, INEE (2010).
- Code of Good Practice in the Management and Support of Aid Personnel, People in Aid (2003).

Risk Analysis:

Risk and how to avoid risk are now a major part of many organisations' working strategy. The more we talk about and recognise risk, the more we can think about preventing it.

Risk assessment involves seven stages:

- Establishing the context, scope and setting of your organisation.
- Identifying your organisation's potential impact on or contact with children.
- Identifying and analysing the potential risks of that impact or contact.
- Evaluating the risks in terms of likelihood they could occur and the seriousness of the impact on children.
- Implementing strategies to minimise and prevent risk.
- Reviewing and revising risks and preventative measures.
- Communicating and consulting.

Context, scope and setting (questions to ask):

- Is your organisation located in places where child abuse is prevalent?
- Is your organisation located in places where laws and authorities are weak in responding to child abuse?

Impact on or contact with children (questions to ask):

- Does your organisation involve working with children?
- Does your organisation impact upon communities and children?
- Does your organisation bring staff and associates in contact with children?

When analysing risks at organization, country mission, project and activity levels, the following risk significance levels should be used:

DEFINITION OF RISK SIGNIFICANCE LEVELS:**HIGH**

Highly likely to happen and significant impact on child.

MEDIUM

Either highly likely to happen or significant impact on child.

LOW

Less likely to happen and less of an impact child.

Information to gather at the local and national level:***Legal Resources:***

- Details of any government body or organisation with statutory authority for the safeguarding of children.
- Summary of legislation governing safety/protection/welfare of children.
- International conventions to which the country is a signatory or has ratified (for instance: the UN Convention on the Rights of the Child).
- Brief analysis of implementation/enforcement of legislation as far as this is known.
- Local police position on investigation of criminal assault against children and likelihood of prosecution of such offences.
- Legal age of consent in country and legislation covering this.

Other Agencies, Organisations and Structures:

- Details of health and other services that may be accessed as part of the response to CP cases.
- Details of agencies and organisations, relevant bodies and professional networks, including any local joint arrangement for dealing with CP issues, HIV, women's centres/ refuges or safe housing.
- Details of any academic institutions working on children's rights.
- Details of locally-based agencies and organisations working on CP/children's rights.

Affected and Local Communities:

- Information on the kinds of behaviour seen in the local area which might lead to cause harm to children.
- Information on harmful practices such as early marriage, initiation ceremonies, and female circumcision.
- Information on formal and informal community-based justice, safety and protection mechanisms, and how these function.
- Information on community resources such as local advocacy groups, community and faith groups, or organised children's activities which could support CP prevention and response.



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