

Child Protection Policy

POLICY TITLE:	ADM-011-Child Protection Policy
POLICY VERSION:	Version 2.2
POLICY OWNER:	Manu Nathan
APPROVED BY:	Bob Ranck
EFFECTIVE DATE:	August 12, 2018

This document and any files transmitted with it are confidential and intended solely for the internal use of Project Orbis International, Inc. ("Orbis" or the "Organization") employees. You may not disseminate, distribute or copy this document without the express permission of the Orbis Legal Department.

APPLICABILITY

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Employee Exempt | <input checked="" type="checkbox"/> Employee Non-Exempt | <input checked="" type="checkbox"/> Executive |
| <input checked="" type="checkbox"/> Board of Directors | <input checked="" type="checkbox"/> Volunteer | <input checked="" type="checkbox"/> Visitor |
| <input checked="" type="checkbox"/> Partner | <input checked="" type="checkbox"/> Contractor/Representative | |

FUNCTIONAL APPLICABILITY

- | | | |
|--|---|--------------------------------------|
| <input checked="" type="checkbox"/> All | <input type="checkbox"/> Communications | <input type="checkbox"/> Development |
| <input type="checkbox"/> Executive | <input type="checkbox"/> FEH | <input type="checkbox"/> Finance |
| <input type="checkbox"/> Human Resources | <input type="checkbox"/> Information Technology | <input type="checkbox"/> Legal |
| <input type="checkbox"/> Program | <input type="checkbox"/> Operations | |

APPLICABLE COUNTRIES

- | | | |
|--|--|------------------------------------|
| <input checked="" type="checkbox"/> Global | <input type="checkbox"/> Bangladesh | <input type="checkbox"/> China |
| <input type="checkbox"/> Ethiopia | <input type="checkbox"/> India | <input type="checkbox"/> Hong Kong |
| <input type="checkbox"/> South Africa | <input type="checkbox"/> United States | <input type="checkbox"/> Vietnam |
| <input type="checkbox"/> Zambia | | |

APPLICABLE AFFILIATES

- | | | |
|--|------------------------------------|---------------------------------------|
| <input checked="" type="checkbox"/> Global | <input type="checkbox"/> Canada | <input type="checkbox"/> Ireland |
| <input type="checkbox"/> Macau | <input type="checkbox"/> Singapore | <input type="checkbox"/> South Africa |
| <input type="checkbox"/> UK | | |

POLICY DELIVERY PROCESS

- | | | |
|--|--|---|
| <input checked="" type="checkbox"/> Training | <input checked="" type="checkbox"/> Acknowledgment | <input checked="" type="checkbox"/> Publish |
|--|--|---|

EMPLOYEE ACTION

- | | | |
|---|---|-------------------------------|
| <input checked="" type="checkbox"/> Complete Training | <input checked="" type="checkbox"/> Signature | <input type="checkbox"/> None |
|---|---|-------------------------------|

POLICY REQUIREMENTS

- | | |
|---|---|
| <input checked="" type="checkbox"/> Statutory | <input checked="" type="checkbox"/> Operational |
|---|---|

TABLE OF CONTENTS

1. Purpose and Overview.....	3
2. Definitions.....	3
3. Working with Children	4
4. Definitions of Child Abuse	5
4.1: Physical Abuse	5
4.2: Emotional Abuse.....	5
4.3: Neglect	5
4.4: Child Sexual Abuse	6
4.5: Commercial or Other Exploitation	6
5. Recruitment and Selection	6
6. Communications and Child Protection Guidelines	7
7. Information Communication Technology	7
8. Partners.....	7
9. Associates	8
10. Reporting and Responding to Child Protection Concerns, Complaints, Allegations, Suspicions, and Incidents.....	8
10.1: Reporting cases of alleged child abuse	8
10.2: Investigating cases of alleged child abuse.....	9
10.3: Orbis Ethics and Compliance Hotline	9
11. Noncompliance.....	9
12. Education and Training	10
13. Monitoring and Review	10
14. Revision History.....	11
ANNEX I: PATIENT CASE STUDY INTERVIEW PACK	12
ANNEX II: CONSENT TO CHILDREN PARTICIPATING IN ACTIVITIES OR EVENTS	21
ANNEX III: VISITOR AGREEMENT FORM.....	22
ANNEX IV: REPORTING AND RECORDING FORMAT	24

1. Purpose and Overview

Orbis, including its branch offices, has a commitment to the safety and protection of all children, and has specific responsibilities towards the children it is in contact with through its activities. Furthermore, each of Orbis's affiliates shares this commitment and has in place its Child Protection Policy in accordance with local laws and regulations. Orbis (i) recognizes the risks faced by children, the difficulties they face in reporting harm they experience, and the right of all children to be free from violence, abuse and exploitation and (ii) undertakes to promote their safety, protection and well-being.

Orbis carries out activities globally that bring employees and people working on behalf of Orbis into contact with children. Orbis is committed to creating and maintaining a safe environment for children. Their welfare is important, and reasonable steps must be taken to prevent them from being harmed. Orbis will not tolerate our staff, partners, or associates, to knowingly engage in, or support, any type of child abuse. The principle of the best interests of the child guides all our interactions with the children we serve.

Orbis also recognizes the right of all children to equal protection. This Child Protection Policy applies to all children regardless of gender, ethnicity, disability, sexual orientation, religion, or other defining characteristics. While primarily intended to safeguard children, this policy is also meant to protect individuals from any false allegation of improper conduct towards children. This policy also serves to protect the reputation of Orbis.

No person who is prohibited by law or regulation from working with children may take up any role with Orbis. Consequences of breaching this Child Protection Policy are explicit and include disciplinary action up to and including dismissal, or termination of contract, along with possible further action as required, e.g., referral to criminal or national authorities.

This policy includes guidance, which is not exhaustive, on appropriate and expected standards of behavior of adults towards children. It has been designed to give all who work with Orbis (staff, partners, associates, and volunteers) the confidence to carry out their roles and to ensure positive and appropriate interactions with children.

The principle is that staff, partners, associates and volunteers should avoid actions or behavior that may constitute poor practice or potentially abusive behavior towards children and should ensure that a culture of openness exists wherein actual or potential breaches of the policy may be raised and investigated as appropriate.

While this policy applies to professional/work conduct, Orbis expects everyone to apply these good practice principles in their personal lives. It should be noted that should child protection concerns arise in relation to staff and others outside their professional roles (i.e., concerns regarding their behavior towards children that would constitute a breach of this Child Protection Policy), Orbis may consider follow up action, including possible disciplinary action.

This policy commits all employees, partners, associates, and volunteers of Orbis to abide by any other applicable Orbis policy and procedures, and specifically behavior protocols, regarding their interaction with children, use of children's images and information, and reporting concerns.

Relevant Orbis contracts and agreements will reference Orbis's commitment to child safeguarding and require compliance with this Child Protection Policy.

2. Definitions

Child: defined by the United Nations Convention on the Rights of the Child to be any person under the age of 18 years.

3. Working with Children

Direct contact/working with children or regulated activities: means being in the physical presence of a child or children in the context of Orbis's activities, whether contact is occasional or regular, short or long term.

Indirect contact/impact on children or controlled activities: means having access to information on children in the context of Orbis's activities, such as children's names, locations (addresses of individuals or projects), photographs, and case studies. It also describes the impact that Orbis programs or projects may have on children, even if they are not our direct beneficiaries.

When working with children YOU MUST ALWAYS:

- Avoid working alone with a child, and plan your work so that at least two adults are present at any time if possible. If working alone is unavoidable, you should move to an area/workstation where another adult can see both you and the child.
- Avoid inappropriate physical contact with a child. If a child is hurt or distressed, do your best to comfort or reassure her/him without compromising her/his dignity or doing anything to discredit your own behavior. Understand local norms about acceptable physical contact between children and adults, and ensure that any appropriate physical contact, such as holding hands, is initiated by the child.
- Behave appropriately; ensure that language is moderated in a child's presence, and refrain from adult jokes or comments that may cause discomfort or offence.
- Be sensitive to local norms and standards of behavior towards children.
- Listen to what the children are saying and respond appropriately.
- Plan activities in advance to take into account the age range and ability of all participants. Supervisors should make certain that the age, gender, and any special needs of children are considered when planning an activity to ensure suitability.
- Be aware of situations that may present risks and manage them appropriately and accordingly.
- Be familiar with Orbis's and/or the partner organization's procedures for reporting concerns or incidents.
- Immediately report any concerns, based on allegations from the child or from your own suspicions, relating to the welfare of a child in your care to the local manager, or a Designated Person. It is your responsibility to know who is a Designated Person in the office you work in and/or working from and how to contact her/him; if you don't know, contact your Human Resources representative for the information. An Orbis incident form must be completed for any report.
- Maintain confidentiality.

When working with children YOU MUST NEVER:

- Hit or otherwise physically assault or physically abuse them.
- Develop physical/sexual relationships with them.
- Develop relationships with them that could in any way be deemed exploitative or abusive.
- Take children to your home.
- Act in ways that may be abusive or may place them at risk of abuse.

- Use language, make suggestions or offer advice that is inappropriate, offensive, or abusive.
- Behave verbally or physically in a manner that is inappropriate or sexually provocative.
- Do things for a child of a personal nature that they can do for themselves.
- Condone, or participate in, behavior with a child that is illegal, unsafe or abusive.
- Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment, or favor particular children to the exclusion of others.
- Allow allegations made by a child or concerns about their welfare to go unrecorded or not acted upon.
- Use any computer or other electronic device to view, download, distribute, or create, indecent or inappropriate images of children (in many countries it is a criminal offence to do so), or in any other way possess or access child pornography.

4. Definitions of Child Abuse

Child abuse constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment, or commercial or other exploitation, resulting in actual or potential harm to a child's health, survival, development, or dignity in the context of a relationship of responsibility, trust or power.

While child abuse encompasses a wide range of conduct and situations, the main types of abuse are categorized and defined as follows.

4.1: Physical Abuse

Physical abuse of a child results in actual or potential physical harm from an interaction or lack of an interaction, which is reasonably within the control of a parent or person in a position of responsibility, trust or power. There may be single or repeated incidents. This abuse may include slapping, punching, poking, shaking, kicking, burning, shoving, or grabbing.

4.2: Emotional Abuse

Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potential and in the context of the society in which the child lives. There may also be acts towards the child that cause or have a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power. Such acts include restriction of movement, patterns of belittling, name calling, denigrating, scapegoating, threatening, scaring, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment.

4.3: Neglect

Neglect is the failure to provide for the child's development in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions in the context of resources reasonably available to the family or caregivers, causing or having a high probability of causing harm to the child's health or physical, mental, spiritual, moral, or social development. This includes the failure to properly supervise and protect children from harm as much as is feasible.

Identifying neglect in resource poor contexts can be especially difficult. Failure to provide adequately for children in situations of extreme poverty does not necessarily constitute neglectful behavior. Rather, it is a

case of assessing available resources and the efforts parents and caregivers are making to meet the needs of their children.

4.4: Child Sexual Abuse

Child sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or is not developmentally prepared for, or that violates the laws or social taboos of society. Child sexual abuse is any activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust, or power, with the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to:

- the inducement or coercion of a child to engage in any unlawful sexual activity;
- the exploitative use of child in prostitution or other unlawful sexual practices; and
- the exploitative use of children in pornographic performances and materials.

In accordance with the UN Secretary General's bulletin "Special Measures for Protection from Sexual Exploitation and Sexual Abuse" (ST/SGB/2003/13), Orbis also subscribes to the following principles on the prevention of sexual exploitation and abuse:

- Sexual exploitation and abuse by staff, partners, or associates constitute acts of gross misconduct, and are therefore grounds for termination of employment or relationship.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
- Exchange of money, employment, goods, or services for sex, including sexual favors, or other forms of humiliating, degrading or exploitative behavior, is prohibited. This includes exchange of any assistance that is due to children with whom Orbis works.
- Staff, partners, associates, and volunteers are obliged to create and maintain an environment that prevents sexual exploitation and abuse.

4.5: Commercial or Other Exploitation

Commercial or other exploitation of a child refers to use of the child in work or other activities for the economic and/or material benefit of others. This includes, but is not limited to, child labor and child prostitution. These activities are detrimental to a child's physical or mental health, education, or spiritual, moral or social-emotional development.

5. Recruitment and Selection

All current and new roles or positions within Orbis will be assessed as to whether or not they entail 'working with children'. In addition to Orbis's standard recruitment processes, the following measures will be required for all staff and volunteers who are to work with children, prior to assuming their position.

- accept and commit to the Orbis Child Protection Policy;
- complete a written application form;
- provide the name and contact information of two character references;
- provide photographic evidence of their identity; and
- agree to comply as appropriate with any applicable laws and regulations regarding working with children in the area / region where they will be employed.

6. Communications and Child Protection Guidelines

Orbis is committed to portraying children in a respectful, appropriate and consensual way, and never in a vulnerable or submissive manner. Individuals representing Orbis or its partners must adhere to the following guidelines when capturing, storing, displaying, or publishing, children's images:

- The informed, written consent of the parent/guardian should must always be obtained before a photograph or image of, or information about, a child is used, and its intended and/or possible use(s) explained. The informed, written consent of the child must be obtained if needed in accordance with local laws and/or regulations.
- Personal information about a child (such as full name and date of birth or full names of family members) and information that could be used to identify his/her specific location within a country (such as village or community names, school, parish, etc.) will not be used.
- Local cultural traditions must be respected in all images.
- Children who have experienced violence, exploitation, have been otherwise abused or are in some way particularly vulnerable or at risk, will not be identified by either personal details or images that may lead to their identification.
- There will be no use of images of children in a state of undress, or images which could be interpreted as sexually suggestive and impact negatively on their dignity or privacy.
- All images and stories, along with accompanying details of individuals, will be used and kept according to relevant data and privacy laws. Orbis uses images for a period of five years and retains them for an additional five years.
- When Orbis's photographs of children are used in a presentation, the presenter will make known to the audience that photographs of children may not be used without express permission of Orbis.
- All photographers working for Orbis will be screened for their suitability, including police checks where appropriate, and will receive and sign the Child Protection Policy.

7. Information Communication Technology

Orbis prohibits any use of its computer systems and networks in violation of any applicable law or Orbis policy, including those covering child protection, equal opportunities, racial and sexual harassment, discrimination, confidentiality, copyright and intellectual property rights, proprietary rights, publications, bullying, data protection and privacy; and/or any use that may potentially cause any damage, PR risk, legal or other liabilities to Orbis or its staff.

Violation of any of the policies by any user may result in disciplinary action, including termination of employment or contractual/other relationships or even criminal prosecution.

8. Partners

All partner organizations that work with Orbis and who work with children are required to have in place and adhere to minimum standards for child protection and/or the policies and procedures that relate specifically to that program or project.

During grant application and contracting processes, Orbis will assess the need for partners to comply with this Child Protection Policy, and where activities involve working with or having an impact on children (i.e., where grantees/contractors are engaged in an activity on behalf of or funded by Orbis that involves direct contact with, or facilitates access to, children), they will be required to indicate their current level of compliance with

Orbis's minimum safeguarding standards and/or describe plans to ensure any areas of non-compliance will be met before, or within an agreed period after, the commencement of the grant/contract.

Existing grantees and contractors will also be required to develop protection measures in line with the minimum standards, either within the current grant period or on renewal, or at an agreed point as appropriate.

Compliance with the agreed minimum standards will be written in to relevant contractual, partnership agreements and grantee contracts when working with children is involved, and will be monitored via existing reporting and audit arrangements.

9. Associates

Orbis provides a range of people with access to our activities and to children we work with. This highly privileged access should only be granted for legitimate work purposes. Orbis associates include donors, consultants and others brought into contact with children by Orbis.

Safeguarding children is our highest priority, and it is possible some associates could inadvertently create situations that may impact negatively on children or, in worst-case scenario, pose a risk to children.

All associates who come into contact with children through Orbis's activities, *whatever their role or status*, must have clearance, i.e., permissions from relevant managers and undergo pre-visit screening. Most importantly, all associates, at the very least, will be provided with and briefed on this Child Protection Policy and will, at all times, be accompanied and supervised by staff when in contact with children.

10. Reporting and Responding to Child Protection Concerns, Complaints, Allegations, Suspicions, and Incidents

10.1: Reporting cases of alleged child abuse

Orbis is committed to responding appropriately to all reports or indications, including rumors, that suggest a child may be harmed or at risk of harm. Any allegations of abuse made against anyone working for Orbis in any capacity will be thoroughly investigated as will any alleged breach of this Child Protection Policy. Orbis takes all concerns and reports of child abuse seriously, and acts on these reports promptly and in compliance with the mandatory reporting laws of the relevant country.

Orbis's mandatory internal reporting requirement means everyone covered by this policy is duty bound to report any concerns that may arise in the course of their work. These concerns may relate to a child or a staff member involved with Orbis or Orbis's partner, or a concern about a child or person/s outside of the Orbis programs.

Orbis and partners will agree on local reporting mechanisms that are relevant for the project and the context in which the project is being delivered. Partners receiving reports of concerns arising from an Orbis supported project must report the concerns to Orbis to ensure that appropriate measures are taken.

Any suspicion of actual or potentially abusive or harmful behavior towards a child, or behavior or situations that might place a child at risk of harm, must be immediately reported to Orbis supervisors who will then act in accordance with this Child Protection Policy and any other applicable Orbis's policies and procedures and local laws. Principally this relates to children Orbis is in direct contact with through its work, but could encompass actual or potential harm to other children that Orbis is in indirect contact with or is made aware of, e.g., in the wider communities in which we work.

In countries that have a national child abuse reporting and prevention program, supervisors must contact the appropriate authorities in line with the local reporting mechanisms.

If an allegation against you is made directly to you, make a written record of the allegation and advise your manager or the Global Director of Human Resources immediately. You should also report to your manager or Global Director of Human Resources if you:

- accidentally hurt a child or a child is harmed in any way;
- if he/she seems distressed in any manner;
- if a child appears to be sexually aroused by you; and/or
- if a child misunderstands or misinterprets anything you have done, which could be construed as a breach or potential breach of the Child Protection Policy.

Orbis operates a Whistle Blower Policy. Orbis assures all staff, partners and associates that no adverse action will be taken against individuals who in good faith report a child protection concern. All reports will be treated as confidential, but, in some situations, the investigation or disciplinary processes may not be concluded unless the source of the information and a statement by the individual are produced as part of the evidence. Any employee who intentionally makes false and malicious allegations will face disciplinary action.

10.2: Investigating cases of alleged child abuse

Upon receipt of an allegation of child abuse, Orbis and/or partners will activate a prompt, thorough and confidential investigation that treats all parties with respect and fairness, in line with agreed investigation procedures. Orbis will also take preliminary or temporary action to prevent any potential continuation of child abuse. Throughout the investigation, every effort will be made to protect the rights and safety of the child; there will be no contact between the alleged offender and the child, and the child will be interviewed and assessed by an external investigator with no affiliation to Orbis and who is skilled in the assessment of child abuse.

In the case of alleged child abuse by a representative of an Orbis partner institution, Orbis will collaborate with the management of the partner institution to investigate the case. If the partner institution is unwilling to collaborate, Orbis will contact local police and may end the relationship with the partner.

10.3: Orbis Ethics and Compliance Hotline

In addition to the above reporting mechanisms, Orbis has established the Orbis Ethics and Compliance Hotline to provide employees a tool to report their concerns in writing online or verbally via telephone in a confidential and anonymous manner. Reports can be made verbally or in writing, in person or anonymously.

If you have a good faith concern regarding the application of this Child Protection Policy, you should promptly submit a report via the Orbis Ethics and Compliance Hotline. Or, if you prefer not to use the Orbis Ethics and Compliance Hotline, you may also advise the Global Human Resources Director or the General Counsel.

FOR INSTRUCTIONS ON FILING A REPORT ONLINE OR VIA TELEPHONE, GO TO:

[HTTP://ORBISINTERNATIONAL.ETHICSPPOINT.COM](http://orbisinternational.ethicspoint.com)

11. Noncompliance

All applicable employees and representatives are responsible for reviewing this Child Protection Policy, familiarizing themselves with its content, and for compliance. Violations of this Child Protection Policy may lead to disciplinary action up to and including termination from employment, or termination of a third-party business relationship. Depending on the country, Orbis may be required or choose to alert law enforcement.

12. Education and Training

Orbis understands that, in order for the Child Protection Policy to be understood and effectively implemented, it is essential that there are high levels of awareness regarding the policy and that Orbis staff and others are clear, confident and competent in putting the policy into practice.

Orbis will:

- Disseminate and promote the policy widely. Hard and electronic copies of the policy will be made available and accessible to all stakeholders.
- Distribute the policy to partners and any other relevant parties beyond Orbis to ensure that the policy commitments, principles and practices are publicized and that everyone is clear about Orbis's position in relation to safeguarding children.
- Incorporate briefings and trainings as part of an initial roll out of the policy and incorporate into standard induction processes for all staff. Training on the policy will be compulsory and must be completed within 6 months of the launch of the policy for existing staff and during onboarding process for new staff. Refresher training is mandatory every two years. Staff working with children must have a full briefing on the policy prior to working directly with children.
- Provide access to regular training updates and refresher courses to ensure that the policy continues to be implemented and that staff are made aware of changes and developments to the policy and its implementation.
- Ensure further training is provided for staff with specific responsibilities for the Child Protection Policy.

Orbis will provide staff with access to materials and resources, as they are developed, that support understanding and implementation of the policy, and will also encourage sharing of experiences and examples of good practice in implementing the policy across Orbis.

13. Monitoring and Review

Orbis will ensure that implementation of the Child Protection Policy is subject to regular monitoring and will review the policy approximately every two years (although changes may be made prior to formal review should legal, policy or practice changes necessitate).

International standards for child safeguarding will be detailed in the procedures developed to accompany this policy and will be used as a guide when monitoring implementation of the Child Protection Policy. The aim is to ensure all offices and affiliates meet these standards. The office and/or regionally specific procedures are or will be included in the policy's appendix.

The Global Director of Human Resources will be responsible for supporting and maintaining an overview of implementation and compliance issues across the organization. The Chief of Program will be responsible for supporting and maintaining an overview of implementation and compliance within programs and partners supported by Orbis.

14. Revision History

<u>REVISION</u>	<u>APPROVED BY</u>	<u>DATE</u>	<u>REVISION NOTES</u>
2.2	Manu Nathan	8/12/18	<ul style="list-style-type: none"> • Updated Annex I Consent Form. • Updated template.
2.1	Manu Nathan	6/25/18	<ul style="list-style-type: none"> • Added all four annexes & uploaded to the intranet.
2.0	Manu Nathan	3/29/18	<ul style="list-style-type: none"> • This policy updates and replaces the previous Child Protection Policy, which was effective as of July 17, 2014.

ANNEX I: PATIENT CASE STUDY INTERVIEW PACK

Instructions for the Interviewer

- Complete the consent form before commencing the interview.
- Use a recording device, but only if the patient allows you and is comfortable with it. Complete the mandatory section as far as possible. Consult medical staff if necessary.
- Answer as many of the questions as possible. Listen carefully, and probe answers for details.
- However, do not press respondents for answers which they may not feel comfortable answering.
- Do not place images in Word files; always attach images to emails.
- Case stories and photos must be destroyed after 5 years of sourcing; ensure all photos & files are dated.
- See the attached photo guidelines to ensure photos meet the guidelines.
- Please remember that this is a conversational interview; allow the person to speak and do not interrupt him/her as we want to allow him/her to tell his/her story. However, please ensure that you ask all the questions and sub-questions and obtain as many answers as possible.
- Keep in mind that the probes are there to provide guidance if the person is struggling to give an answer to some specific questions.
- If the patient is under the age of 16, make sure to guide him/her through the consent cartoon to ensure that he/she understands the purpose of you taking his/her photo.



Orbis Photography Guidelines

1. Always complete the consent form before taking any photographs.
2. Children must be guided through the consent cartoon.
3. Photographs should be engaging and friendly.
4. Avoid photographs of equipment only. Rather show a doctor using the equipment with a patient.
5. Consider the Rule-of-Thirds: Focus areas should be on the green dots (see example one to the left).
6. Avoid taking "mug shots" / facial photos only. Play around with different backdrops (see examples two and three to the left).
7. Take a few good photographs rather than many that are unusable.
8. Respect your subject's time; do not make him/her wait unnecessarily or walk back and forth to get the right shot.
9. Photos must always portray the subject in a positive light and never in a position of vulnerability (see example four).
10. Consider taking photos of individuals doing what they do normally (e.g. a patient reading in the waiting area, a child playing outside, a doctor writing a script).
11. Try to have the patient look at the camera without having the photograph looking staged.
12. Avoid capturing branding like Coca-Cola bottles or branded shirts, except where relevant, e.g. a branded scrub cap or staff member wearing an Orbis shirt.
13. Avoid having the date displayed on the photo; rather, rename the photograph afterwards with the date and subject name.
14. All photos must fall within the guidelines of decency, and the dignity of patients and staff must be upheld at all times.
15. Do not capture offensive, illegal or controversial material.
16. Delete all blurred images, duplicates or photos that do not meet these quality guidelines (see examples five and six).
17. All copies of photos must be destroyed after five years.

Before taking any images of children, make sure that you have the parents' consent AND that you have gone through the consent cartoon with the child to ensure that he/she understands why you are taking images of him/her. Never take images of children without their parents being present.

**Authorization/Consent for Use of Photographs, Films,
Medical Images and other Multimedia**

Orbis Record #		
Patient Name		
Date of Birth / Age		

Purpose: Project Orbis International, Inc. ("Orbis") seeks your permission to use your / your child's likeness and medical information and your authorization to take and use audio/video/photographic material of you / your child in Orbis' internal and external communications for medical training and promotional purposes. This consent gives your permission for Orbis staff and approved deputies to take photographs, record films and/or create multimedia items of you / your child for such use by the organization.

Confidentiality: You / your child will not be identified by full name but other people may recognize your / your child's face or voice or other personal Information that is unique to you / your child. Multimedia items will be stored securely. We may disclose details of your / your child's medical condition(s).

Your Rights: You have the right either to refuse filming or to have it discontinued at any time. You may refuse to give permission without any penalty or loss of care or services. By checking any of the boxes below, you have authorized your / your child's personal information to be shared by Orbis for education and training purposes. You / your child will still receive treatment even if you withhold consent to the disclosure of any personal information.

Expiration: You may revoke this authorization, in whole or in part, at any time. Unless you revoke your permission earlier this consent allows Orbis to use your / your child's images / recording for fifty years from the date of signing.

I give permission for these items to be taken or made and used:

- ☐ Photographs
- ☐ Videos / Films
- ☐ Audiotapes / audio clips
- ☐ Medical images
- ☐ Other multimedia items
- ☐ Health information regarding my medical conditions / treatment

I agree that Orbis will own any and all rights in the multimedia items listed above. I waive any and all rights that I may have in the use of my / my child's likeness, photograph, voice or appearance in these multimedia items. Orbis will have the right to reproduce, distribute, sell, transmit, publish, exhibit or otherwise use the multimedia items listed above. I understand that I will not receive any payment for the use of them.

I understand that the multimedia items may include my / my child's health information. I understand the permissions I am giving. My questions have been answered to my satisfaction and I agree to the consents of this form. I will keep a copy of this form.

To the extent permitted by applicable law, I hereby release Orbis from any liability arising from any lawsuits, actions or other claims by me that its use of my /my child's medical information as described in this consent violates any law or regulation concerning data use, processing and protection.

For guardians of minor patients, I hereby certify that I am the guardian of the patient listed above.

I hereby certify that I have read and fully understood the contents of the foregoing. I have read this paper or it has been translated to me by:

Printed Name of Patient / Guardian	
Signature of Patient / Guardian	
Date	
Patient's ID #	
Care taker / Patient's Names	
Care taker / Guardian's ID #	
Printed Name of Person Obtaining Authorization	
Signature of Person Obtaining Authorization	
Date	

Case Details

Patient Name (First Name Only): _____

Residence: _____ (Urban / Rural / Semi-Urban)

Birthdate: _____ Gender: _____

Marital Status: _____ No. of Children: _____

Head of Household: _____ Level of Education: _____

Visual Acuity (R/E): _____ (L/E): _____

Visual Acuity (R/E): _____ (L/E): _____

Pre-Surgery

First Signs of Condition

1. What did you do when you first noticed your (or your child's) eyesight deteriorating/fading?
 - What were your (or your child's) symptoms?
 - Who did you speak to about your (or your child's) symptoms? (traditional healer /family / friends).
 - What did they suggest you do?

2. How long was it before you visited (or took your child to) a medical professional? (clinic/ hospital/ outreach).
 - How did your family react when you decided to go (or take your child) to the medical facility?

Effects of Visual Impairment

1. When did you first notice changes in your (or your child's) vision?
 - How long did you wait before consulting a medical professional?
2. How has having poor vision affected your (or your child's) life?
 - Were you (or your child) reliant on others to help you (your child) with daily activities/tasks?
 - How did impaired vision affect you (or your child) at school or work?
 - How did it affect your ability to earn an income or contribute to your household?
 - How did it affect your (or your child's) relationships?
 - What has been the most difficult things for you (or your child) to do?

Seeking Treatment

1. Tell me what happened when you (or your child) went to see the doctor? (clinic etc.)
 - Who (if any) accompanied you?
 - What did the doctor tell you was wrong with your (or your child's) vision?
 - What did they say the treatment would involve?
 - What were your thoughts on the diagnosis and treatment?
 - How did your family react to the diagnosis and treatment?
-

2. What barriers or challenges did you (or your child) face in getting treatment after diagnosis?
 - Financial
 - Transport
 - Someone to accompany you
 - Family and social support
 - Fears of surgery
 - Family decision making about the surgery
-
-

Decision Drivers

1. What do you look forward to most once your (or your child's) vision has been restored?
-
2. How did you hear about the eye care service at [*facility*]?
-
3. Do you know anyone else whose vision was restored here **OR** who has vision problems?
 - Are they coming for follow-ups **OR** will you recommend they seek treatment here?
-

Post-Surgery

Experience

1. How was your experience at the hospital when you (or your child) went in for surgery?
 - What questions did you have before surgery?
 - What did the doctor explain he/she was going to do?
 - How did you feel going into (or when your child was going into) the surgery?
 - Did you (or your child) experience any pain during or after the surgery?
-
-

Following Surgery

1. How did you (or your child) feel after the surgery?
 - Thoughts and feelings. Describe how you (or your child) felt when the bandage came off.
-
-
2. Were you (or your child) prescribed any medication after the procedure?
 - How should you (or your child) take it?
-
3. Are there any other special things you need to do now to take care of your (or your child's) eyes?
-
4. What are the best things about being able to see clearly for you (or your child)?
-
5. What do you (or your child) like doing now which you couldn't do before?
-
6. What was the first thing you (or your child) did when you got home after surgery?
-
7. How has your (or your child's) life changed after surgery?
 - Improvements in family and social life.
 - Improvements in finances, productive activities or employment opportunities.
 - Improvement in accessing education (e.g. the child is back at school).
 - Participation in daily activities.
-
-
-

Notes / Other

1. Is there anything you would like to say to the Orbis staff and doctors, or mention about your experience?

Staff Notes

Summarized Child Protection Policy

All Orbis staff, volunteers and associates will be required to sign the Orbis Code of Conduct upon joining the organisation, or at the point of engagement. This will be accompanied by a briefing on the child safeguarding policy and the Code of Conduct, and what this means for staff and associate conduct.

- Each office must ensure that it complies with local legislation pertaining to data protection and privacy, and should also follow guidance contained in this document where it sets a higher standard. Personal information about a child (such as full name and date of birth or full names of family members) and information that could be used to identify his/her specific location within a country (such as village or community names, school, parish, etc.) should not be used, especially where this is linked to an image. The maximum information given about a child should be first name and name of the district in which he/she lives.
- Children that have experienced violence, exploitation, have been otherwise abused or are in some way particularly vulnerable or at risk should not have their faces displayed or be otherwise represented in a way that may lead to their identification. In addition, their real names should be changed, and this change be indicated. Other identifying details should also be changed.
- Orbis will not use images of children in states of undress, as doing so may promote the sexualization of children and contribute to maintaining unacceptable perceptions of children. Such images could also be interpreted as sexually suggestive and impact negatively on their dignity or privacy.
- All images and stories, along with accompanying details of individuals, should be used and kept according to relevant data and privacy laws. Additionally:
 - images must be stored securely (e.g. lockable safe/cabinet, electronic files password protected, limited access etc.)
 - images must be destroyed five years after the date on the consent form unless further consent is obtained
- The informed written consent of the child and/or parent/guardian must always be obtained before a photograph or image of a child is taken, and its intended and/or possible use(s) explained. The implications of using images, including risks and possible negative consequences, especially where images will be used on websites should also be fully explained. Ideally, children and parents should be consulted on use of images and stories at the start of a project and consents obtained that will prevail for the duration of the project. Consents should be renewed if the nature of the project work changes or there are significant variations or changes to the way that images and stories will be used that were not anticipated at the start of the project.
- Child-friendly consent forms should be used for obtaining consent from children and, where possible, the child and family should be shown the image before it is published.
- Group photographs: As with individual photographs, it should be explained to the group what the photographs will be used for and consent sought from individuals in the group. Any individuals who wish to opt out should be allowed to do so.
- Orbis aims to promote our work with children as far as possible, but it is important to differentiate between images being produced professionally and therefore subject to review and sign off, and the use of images for personal use. Although staff and others, including visitors, may be keen to share their images widely, photographs or video taken of a child/children, families, and communities, for personal use must not be published on the Internet, via social media or in printed materials without the prior written permission of Orbis.
- Orbis will, at all times, adhere to and maintain proper photographic conduct:
 - Images of children must not show them in states of undress or in inappropriate poses.
 - Details attached to images and included in stories must not allow that child to be traced to his or her home or community.
 - Distinctive buildings, street signs or landmarks should not be included in an image if they identify where a child lives or works.
 - Geotagging of images should be disabled when taking photographs.
 - Photographers/journalists/translators Orbis employs must be properly vetted and reference checked.
 - Informed consent by children and their parents/carers to take their image and use their information must always be obtained.
 - Dating marketing material or collateral to ensure that patient images will be removed from circulation after 5 years.

If, for any reason whatsoever, you wish to revoke your consent for Orbis to use images or materials relating to you or your child's case, or to obtain a full copy of the Orbis Child Protection Policy, please contact us:

Project Orbis International, Inc. 520 8th Avenue, 12th Floor, New York, NY 10018

1.646.674.5582 | manu.nathan@orbis.org

ANNEX II: CONSENT TO CHILDREN PARTICIPATING IN ACTIVITIES OR EVENTS

This form must be completed by a parent/carer with parental responsibility before their child can participate in planned activities or events (such as school eye screenings). Where a child is without a parent/guardian, a carer or responsible/trusted adult nominated by the child may provide consent, or, depending on age and capacity, it may also be possible for the child to provide his/her own consent.

Planned activity: _____

Planned date: _____

I agree to my child, _____ (name) taking part in the above-mentioned activity and agree to his/her participation in the activities described.

Signed: _____

Date: _____

Name of child: _____

Home Address: _____

Telephone No.: _____

Date of Birth: _____

Age: _____

Name and details of parent/carer: (if different address from above): _____

Parent/Carer's Tel. No.: _____

Name of School/group/organization: _____

Class: _____

Any other comments or information you feel may be needed or useful:

ANNEX III: VISITOR AGREEMENT FORM

To be completed by each visitor

The following agreement has been drawn up for your best interests, as well as that of the children, families and communities we are working with.

All visitors must complete this form. Please read the Orbis Child Safeguarding Policy and Code of Conduct prior to signing this form.

Visitor Agreement

- I agree to work with Orbis and project partners to arrange this and any subsequent visit to see its work or meet with any of the children involved in its programs. I understand that a minimum of 6-8 weeks' notice is required prior to a visit being made.
- I agree to undergo a Police Check using the service offered by the relevant police force or the Criminal Records Bureau or similar organization
- I will not arrange to meet any of the children I am visiting, nor visit the projects or communities, without the presence of a project partner member or staff.
- I agree not to give any personal contact details (e.g. address/telephone number/email address) to the children or other children I meet, their family or community, nor will I seek to obtain contact details for the children or families.
- I agree not to correspond directly with them after the visit.
- I agree not to discuss, offer or agree to the provision of direct financial support to the child/children or families.
- I agree that all photographs I take of child/children, families and communities are for my personal use and I will not publish them on the Internet or on any other printed materials without the prior permission of Orbis and project partners.
- I agree that all gifts, of any kind, intended for children, families or the community will be agreed in advance with staff.
- I will not hold Orbis and project partners responsible for any injuries or accidents that may occur during the visit. I will ensure that I have comprehensive insurance coverage for the trip and all required vaccines have been administered.
- ♦ I understand that it is important to show respect to the staff, children, families and communities I meet and to take into consideration the cultural sensitivities of the country I am visiting.
- ♦ I understand that the child I visit has family/parents/guardians, and I will respect and adhere to boundaries they may set.

I hereby agree to all of the above conditions and guidelines with regard to visit. I understand that Orbis and project partners reserve the right to terminate my visit for any reason, and particularly if any of these conditions are breached.

Signed: _____ Date: _____

Proposed Visit date _____ Country _____

Your name _____

Your address _____

_____ Postcode _____

Thank you taking the time to read and complete this form. Thank you also for helping us to ensure your visit is safe and successful.

ANNEX IV: REPORTING AND RECORDING FORMAT

Orbis considers the abuse and exploitation of children to be completely unacceptable. We will take all concerns and reports of child abuse seriously and act on these reports immediately and in compliance with the mandatory reporting laws in the local country.

Individuals representing Orbis or Orbis's partners are duty-bound to report concerns or allegations of child abuse. These concerns may relate to a child or a staff member involved in Orbis or Orbis's partner or a concern about a child or person/s outside of the Orbis programs.

When to report?

Any individual who has observed or was told about behavior that could be considered child abuse **must** immediately report the information as outlined below. Any individual who has concerns about the appropriateness of actions involving children by those representing Orbis or Orbis's partners **must** immediately report their concerns as outlined below.

No adverse action will be taken against individuals who report violations of this policy in good faith. Any employee who intentionally makes false and malicious allegations will face disciplinary action.

Who to report to?

Any observations or allegations of child abuse must be reported to the General Counsel & Chief Compliance Officer or to any other member of the Orbis senior team and/or the Chair of the Board of Directors and/or any Board Director. If allegations of child abuse center on the CEO or any of these individuals, reports must be directed to the Orbis Global Director of Human Resources. Reports can be made in-person, in writing (email or letter) or via telephone/Skype. If allegations of child abuse center on representatives of Orbis's partner institution, reports must be made to the General Counsel & Chief Compliance Officer.

In countries that have a national child abuse reporting and prevention program, individuals must contact the appropriate authorities as well as the authorities mentioned above.

In addition to the above reporting mechanisms, Orbis has established the Orbis Ethics and Compliance Hotline to provide employees a tool to report their concerns in writing online or verbally via telephone in a confidential and anonymous manner. Reports can be made verbally or in writing, in person or anonymously.

If you have a good faith concern regarding the application of this Child Protection Policy, you should promptly submit a report via the Orbis Ethics and Compliance Hotline. Or, if you prefer not to use the Orbis Ethics and Compliance Hotline, you may also advise the Global Human Resources Director or the General Counsel.

FOR INSTRUCTIONS ON FILING A REPORT ONLINE OR VIA TELEPHONE, GO TO:

[HTTP://ORBISINTERNATIONAL.ETHICSPPOINT.COM](http://orbisinternational.ethicspoint.com)

Investigating cases of alleged child abuse

Upon receipt of an allegation of child abuse, Orbis will activate a prompt, thorough and confidential investigation that treats all parties with respect and fairness. Orbis will also take preliminary or temporary action to prevent any potential continuation of child abuse. Throughout the investigation, every effort will be made to protect the rights and safety of the child; there will be no contact between the alleged offender and the child, and the child will be interviewed and assessed by an external role-player with no affiliation to Orbis and skilled in the assessment of child abuse.

An initial assessment of the quality and reliability of the information will determine the next steps of the investigation. The investigation will endeavor to gather sufficient facts and details to allow an unbiased assessment of the allegation, the needs of the child, and the way forward. Upon the conclusion of the investigation, final action will be taken to safeguard the child(ren) and prevent further abuse.

Orbis employees found guilty of child abuse shall face disciplinary action, up to and including termination of employment. Upon conclusion that someone external to the organization is abusing a child, Orbis will contact the local police or appropriate authority. Orbis will also report concerns about people engaging in child sex tourism, child sex trafficking and child pornography to the local police or a specialized crime unit focused on such matters.

In the case of alleged child abuse by representatives of Orbis's partner institution, Orbis will collaborate with the management of the partner institution to investigate the case as outlined above. If the partner institution is unwilling to collaborate, Orbis will contact local police and may end the relationship with the partner.

Where it is concluded that abuse and/or neglect of the child has occurred, Orbis will take responsibility for ensuring that the child receives appropriate therapeutic assessment and intervention.

A SUMMARY OF INCIDENT: *(Who is alleged to have done what to whom, where and when? Was anyone else present? Please give a short description of the incident)*

DATE AND TIME OF INCIDENT:

DATE AND TIME REPORT CREATED AND SENT:

PROJECT/LOCATION IN WHICH INCIDENT HAPPENED/CONCERNS AROSE:

BACKGROUND TO INCIDENT – WHAT WAS HAPPENING/WHAT ACTIVITIES WERE UNDERWAY, ETC?

B YOUR DETAILS:

Name: _____ Sex: ☐ Male ☐ Female

Address: _____

Telephone: _____

Mobile: _____

Fax: _____

E-mail: _____

Position in or relationship to Orbis: _____

Relationship to child / young person: _____

C CHILD'S / CHILDREN'S DETAILS

Name: _____ Sex: ☐ Male ☐ Female

Age: _____ Date of Birth: _____

Address: _____

Language/s spoken _____

Any Disability _____

School _____ Class _____ Teacher _____

Name and contact details of parents/legal guardians/care takers (delete as appropriate):

Name: _____ Sex: ☐ Male ☐ Female

Age: _____ Date of Birth: _____

Address: _____

Language/s spoken _____

Any Disability _____

School _____ Class _____ Teacher _____

Name and contact details of parents/legal guardians/care takers (delete as appropriate):

D DETAILS OF THE ALLEGED PERPETRATOR / SUBJECT OF CHILD PROTECTION CONCERN:

Name: _____ Sex: ☐ Male ☐ Female

Nationality: _____

Address/Current Location: _____

Language/s spoken _____ Age: _____

Relationship to victim: _____

Occupation: _____ Employer: _____

If the alleged perpetrator has a prior history of child protection concerns, please elaborate:

Any other details (including physical description, current whereabouts):

E DETAILS OF OTHER PERSONS/ AGENCIES INVOLVED:

PERSON WHO REPORTED THE ALLEGED INCIDENT OR CONCERN:

Name: _____ Sex: ☐ Male ☐ Female

Position in / relation to Orbis: _____

Reported to:

Name: _____ Sex: ☐ Male ☐ Female

Position in / relation to Orbis: _____

DETAILS OF WITNESS (ES)

Name: _____ Sex: ☐ Male ☐ Female

Address: _____

Telephone: _____

Mobile: _____

Fax: _____

E-mail: _____

Position in or relationship to Orbis: _____

Relationship to child / young person: _____

EXTERNAL AGENCIES OR PEOPLE CONTACTED (IF ANY):

Date: _____ Time: _____

Name of agency: _____

Contact at agency:

Name: _____ Sex: ☐ Male ☐ Female

Address: _____

Telephone: _____

Mobile: _____

Fax: _____

E-mail: _____

OTHERS:

Sections F, G & H to be completed by Designated Person**F INVESTIGATION:**

Who was involved in the investigation, roles and responsibilities (investigation team, police/state prosecutor/governmental authority, interviewees, representative of other agencies, etc.)?

G OUTCOME AND ACTION**MAIN CONCLUSION OF THE INVESTIGATION:**

- ☐ Allegations turned out to be true
- ☐ Allegations turned out to be false
- ☐ Findings not conclusive

VICTIM RESPONSE:**ACTIONS TAKEN:**

H LESSONS LEARNED, RECOMMENDATIONS, ACTION TAKEN AND APPENDICES

Lessons learned (strengths and weaknesses in areas such as the Policy and its implementation, management, recruitment, supervision etc.):

Recommendations (recommendations to prevent possible abuse and improve the investigation process in the future):

List of appendices/other documentation (e.g. interview reports, file notes, correspondence):

Completed by:

Name:

Sign:

Date: