

PROJECT ORBIS INTERNATIONAL, INC. CHILD PROTECTION POLICY

For offices and affiliates of Project Orbis
International, Inc.

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Policy Statement

Project Orbis International, Inc. and its branch offices and affiliates, hereinafter collectively referred to as Orbis, has a commitment to the safety and protection of all children, and has particular responsibilities towards the children it is in contact with through its activities. Orbis (i) recognizes risks faced by children, the difficulties they face in reporting harm they experience, and also 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. The 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 the 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.

Working with Children

Following the United Nations Convention on the Rights of the Child, a child is defined as any person under the age of 18 years.

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.

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.

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.

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.

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 feasible¹.

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.

Orbis also subscribes to the following principles on the prevention of sexual exploitation and abuse²:

- 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.

Commercial or Other Exploitation

¹ 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.

² Based on the UN Secretary General's bulletin "Special Measures for Protection from Sexual Exploitation and Sexual Abuse" (ST/SGB/2003/13).

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.

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.

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.
- Orbis will 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.

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.

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.

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 the 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.

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 the Orbis Child Protection Policy and will, at all times, be accompanied and supervised by staff when in contact with children.

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

Reporting cases of alleged child abuse

Orbis is committed to responding 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 the 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. 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. 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 child³, 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.

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 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.

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.

³ 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.

Orbis employees or volunteers found guilty of child abuse shall face disciplinary action, up to and including termination of employment/engagement.

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.

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.

I, _____, understand and agree to abide by the Orbis Child Protection Policy. I understand that any breaches of the Child Protection Policy will be reported to a Designated Person and appropriate action in accordance with all applicable policies and procedures will be taken.

Signature: _____ Date: _____