



SafeHavens Organization

Child Protection Policy

May 2024

Version 1

Foreword

Child maltreatment has occurred since the beginning of recorded history, and is rooted in cultural, economic and social practices. Children are maltreated physically, sexually, emotionally and through neglect. Children are sometimes forced to endure the most hazardous forms of child labor including sweatshops and prostitution. In some countries boys are kidnapped and forced into armed conflict as soldiers. In many countries children experience severe corporal punishment in schools, or at the hands of other caregivers in positions of power or authority. Children living in poverty are more at risk of child abuse and exploitation.

The relationship between an adult and child is not a relationship between equals. Children are dependent on adults to care for and protect them. It is a shared and collective responsibility of all adults to prevent child exploitation and abuse. This policy is intended to guide its practices and those of its project partners when caring for children. Towards that end, SafeHavens Organization adopts this Child Protection Policy to assist both SafeHavens Organization and project partners when caring for children.

SafeHavens Organization

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1. Purpose of Policy

- a. **Objectives.** The ultimate goal of this policy framework ('the policy') is to ensure that all children associated with SafeHavens Organization's program partners are protected from exploitation, abuse or other forms of harm. The policy is intended to foster and protect environments for all of SafeHavens Organization's activities and projects, wherever located.

The Child Protection Policy (CPP) will provide guidance on how SafeHavens Organization will respond to concerns and allegations of child abuse. It provides guidance to both SafeHavens Organization and partner programs on how to work respectfully and effectively with children.

- b. **Policy Review.** The policy will be reviewed by the SafeHavens Organization Board every 2 years. This bi-annual review must include:
 - i. consultation with SafeHavens Organization stakeholders, including children;
 - ii. advice from external experts and partner programs;
 - iii. a review of implementation issues.
- c. **Availability.** The Board will publish the policy as a public document, and make it available to any person requesting it.

2. Rationale

This policy is intended to foster protective environments within SafeHavens Organization and project partner programs supported by SafeHavens Organization that will minimize the risk of all forms of child maltreatment and exploitation.

The policy has been developed to provide a practical framework to assist SafeHavens Organization in pursuit of achieving these objectives.

3. Statement of Commitment

SafeHavens Organization is committed to the safety and wellbeing of all children, and will

take all possible steps to reduce the risks of harm to children involved in programs supported by SafeHavens Organization.

SafeHavens Organization recognizes and is committed to the United Nations Convention on the Rights of the Child (UNCRC), in particular the principle that children have the right to develop in an environment safe from harm, abuse and exploitation.

4. Policy Framework

There are two essential documents in this policy framework. The Child Protection Policy (this document), and a subordinate Child Protection Procedures document. Each of these documents are described in Table 1 below

Documents	Contains	Change Authority	Review Cycle
Child Protection Policy (this document)	General, mandatory rules about specific practices, systems and conduct.	SafeHavens Organization Board of Directors	Reviewed every 2 years.
Child Protection Procedures	Specific procedures about practices, systems and conduct.	Chief Executive of SafeHavens Organization	As deemed necessary by Chief Executive

Table 1. Policy Framework Documents

5. Relevant Authorities

This policy draws upon a wide range of legislation and childcare standards, both in the US and internationally. SafeHavens Organization is bound by such laws where applicable, and aims – by way of this policy – to be consistent with the following:

a. Standards and Charters

- i. United Nations Convention on the Rights of the Child
- ii. Geneva Declaration of the Rights of the Child
www.unhchr.ch/html/menu3/b/25.htm
- iii. International Labor Organization Convention 182 Concerning the Prohibition and
- iv. Immediate Action for the Elimination of the Worst Forms of Child Labour

b. Internal Policies

- i. SafeHavens Organization Data Protection Policy
- ii. SafeHavens Organization Complaints Policy
- iii. SafeHavens Organization Code of Conduct Policy

c. International Legislation. Countries in which SafeHavens Organization intends to operate enforce specific legislation relating to child labor, exploitation and abuse. All

SafeHavens Organization personnel – including board members, staff and volunteers – are required to abide by all such local legislation.

6. Scope

- a. **Application.** The policy applies to the following:
 - i. Members of the SafeHavens Organization Board of Directors;
 - ii. SafeHavens Organization Staff members, whether full-time, part-time or otherwise engaged by SafeHavens Organization;
 - iii. Contractors, researchers, photographers or other organizations providing services to
 - iv. SafeHavens Organization;
 - v. SafeHavens Organization volunteers;
 - vi. All caregivers and guardians involved in SafeHavens Organization-supported programs;
 - vii. Program partners and their downstream partners
 - viii. All persons associated with agencies with which SafeHavens Organization operates in partnership.

When recruiting for positions classified as 'Working with Children' or 'Contact with Children':

1. Interview questions must include at least two behavioral based questions that refer to the roles and responsibilities of the candidate in relation to their work with children;
2. Verbal referee checks must include an assessment of the candidate's suitability to be in a role where they come into contact with children.
3. The applicant will be requested to disclose if they have been charged with child exploitation offenses

- b. **Association.** SafeHavens Organization will not support, financially or otherwise, any program run by any organization which does not agree, in writing, to comply with this Child Protection Policy.

In the event that SafeHavens Organization becomes aware of any non-compliance of this policy by an organization to which SafeHavens Organization is currently providing funding, the Chief Executive Officer will take immediate appropriate steps to ensure compliance. In the event that compliance is not achieved, the Chief Executive Officer will exercise discretion in suspending the funding of that organization.

7. Guiding Principles

SafeHavens Organization policies and practices are guided by the following principles.

Where legislation or policy is silent on any issue, these principles must be applied in all SafeHavens Organization-supported programs and activities.

- a. **Best Interests of the Child.** The US is a signatory to the United Nations Convention on the Rights of the Child. Accordingly, the best interests of the child will be a primary consideration in all SafeHavens Organization programs, policies and activities.
- b. **Zero Tolerance of Child Abuse.** SafeHavens Organization maintains a zero tolerance policy of child exploitation and abuse. Any action or behavior which is reasonably deemed as child exploitation or abuse will, where applicable, be reported to the appropriate authority. SafeHavens Organization will cooperate fully with any authority in applying criminal, civil or disciplinary actions against any person or organization contravening this policy.
- c. **Risk Management Principles.** SafeHavens Organization requires that all SafeHavens Organization-supported programs and activities will be managed according to the best possible risk management principles, as outlined in ISO 31000:2009 – Risk Management and by SafeHavens Organization's Risk Assessment May 2024.
- d. **Procedural Fairness.** When responding to any possible breaches of this policy, SafeHavens Organization will apply fair and reasonable principles to all persons and organizations involved.
- e. **Child Protection Awareness.** SafeHavens Organization will take proactive steps to ensure that all SafeHavens Organization stakeholders are made aware of their responsibilities regarding Child Protection issues.

To be eligible for SafeHavens Organization support, a program must have evidence that the program's staff have been provided appropriate training to ensure the best interests of the child remain paramount in all SafeHavens activities.

- f. **Non-discrimination.** SafeHavens Organization will not discriminate against anyone in its programs on the basis of their age, gender, gender identity, marital status, sexual orientation or preference, nationality, religious or political beliefs, place of residence, or family background.

To be eligible for SafeHavens Organization support, a program must have evidence that the program will not discriminate against anyone on the basis of their age, gender, gender identity, marital status, sexual orientation or preference, nationality, religious or political beliefs, place of residence, or family background.

8. Child Protection Policies

- a. **Child Protection Awareness Training**

- i. Training is Mandatory.

Child Protection Awareness Training is mandatory for all SafeHavens Organization directors, employees, contractors, caregivers and volunteers,

and is to be managed by the CEO.

To be eligible for SafeHavens Organization support, a program must have evidence that its directors, staff, other employees, contractors, and volunteers have completed Child Protection Awareness Training.

ii. Frequency.

An introductory training session is mandatory for all SafeHavens Organization personnel, regardless of their role within the organization.

A bi-annual refresher training session is mandatory for those SafeHavens Organization personnel who have, or are likely to have direct contact with SafeHavens Organization children being cared for or provided services by SafeHavens Organization-supported projects.

To be eligible for SafeHavens Organization support, programs must have evidence of both policies and the provision of introductory training for all personnel in their programs, regardless of their role with in the program, and not-less-than biannual refresher training for all personnel in their programs who have or are likely to have direct contact with the children in their care or who may serve in partnership with SafeHavens Organization.

iii. Partner Agreements

As a condition of funding and other support from SafeHavens Organization all partner organizations must agree in writing to comply with the mandatory training requirements as specified in paragraphs 8.1.1, 8.1.2, and 8.1.3, and to produce evidence of that compliance when requested by SafeHavens Organization.

iv. Responsibilities

The Chief Executive Officer will create and maintain a documented schedule outlining the mandatory training requirements for all SafeHavens Organization personnel. This schedule will mandate the minimum annual training requirements for each category of SafeHavens Organization personnel, and will be included in the Child Protection Procedures document.

v. Coverage

The Chief Executive Officer will, on the best advice available, determine the appropriate level and duration of the Child Protection Awareness Training. Such training must, as a minimum, cover the following topics:

1. Legal issues;
2. SafeHavens Organization Child Protection Policy and procedures;
3. Reporting – mandatory and discretionary;
4. Reporting procedures;
5. Children's rights;
6. Identifying abuse, abusers and victims;

7. Responding to disclosures;
8. Dynamics of abuse, its causes and correlations.

b. Risk Management Policy

i. International Standards

The Board is responsible for ensuring that all SafeHavens Organization activities, policies, and program support are managed according to the risk management principles outlined in ISO 31000:2009 – Risk Management, and in SafeHavens Risk Management Procedures. These principles must be applied iteratively and regularly, with the express aim of minimizing the risk of harm to children.

To be eligible for SafeHavens Organization support, programs are responsible for conducting risk mitigation activities and to have supportive policies in place, and to have evidence that risk reduction reviews are being conducted with the aim of minimizing the risk of harm to children in their care.

ii. Procedural documents

The Chief Executive Officer is responsible for ensuring that an adequately detailed Risk Management Procedure is created, maintained and implemented. These procedures are to be included in the SafeHavens Organization Child Protection Procedures document.

iii. Risk Register

The procedural documents must contain reference to a Risk Register process, wherein all identified risks are documented, and their management recorded.

c. Abuse Reporting

i. Zero Tolerance Policy

SafeHavens Organization maintains a policy of zero-tolerance for any form of personal maltreatment, including but not limited to child abuse (physical, sexual, emotional or psychological) or peer-abuse (including bullying), employee abuse (bullying, intimidation, threatening), or workplace harassment. The mitigation of the risk of abuse, and the minimization of the harm it causes, strongly depends on early detection and investigation.

As a condition of support from SafeHavens Organization, programs must provide evidence of policies and procedures for detecting, reporting, documenting, and responding to any of the previously listed forms of abuse or maltreatment. They must also be willing to report to SafeHavens Organization any such occurrences, and must agree to do so in writing.

ii. Reporting is Compulsory

Any SafeHavens Organization director, employee, contractor, or volunteer who becomes aware of any incident in which:

- (i) a child has been harmed, exploited or abused;
- (ii) a child has been exposed to an unacceptable risk of harm, exploitation or abuse;
- (iii) a child discloses that he or she has been harmed, exploited or abused;
- (iv) any person discloses that he or she has harmed, exploited or abused a child, or has otherwise breached SafeHavens Organization Child Protection policy;
- (v) any person discloses that he or she has witnessed a child being harmed, exploited or abused, or where the SafeHavens Organization Child Protection policy has otherwise been breached.

must, at the earliest available opportunity, invoke and follow the Child Abuse Incident Procedure, as published in the SafeHavens Organization SafeHavens Organization Child Protection Procedures document.

iii. Documented Child Abuse Procedures

In addition to Risk Register procedures mandated above, the SafeHavens Organization Chief Executive Officer is responsible for ensuring that a fully detailed Child Abuse Incident procedure is created, maintained and published in the SafeHavens Organization Child Protection Procedure document.

iv. Response to Reports

General. Where practicable, all reports will be treated seriously, handled professionally and in confidence.

All responses and decisions shall be made in the best interests of the child.

Confidentiality. Where possible, the confidentiality of the reporter should be protected, such that negative effects on the child, their family, the alleged offender, the reporter and SafeHavens Organization are minimized.

As a condition of support, SafeHavens organization project partners must agree to protect the confidentiality of persons as listed above.

Children's Disclosures. Considerable harm has been caused to abused children when their initial disclosures are dismissed or disbelieved by people in authority. Therefore, it is SafeHavens Organization policy that SafeHavens Organization personnel must, unless there is compelling evidence to the contrary, assume that a child's disclosure of abuse is genuine and truthful. Such disclosures must therefore be taken seriously and actioned according to this Policy, and investigated thoroughly.

As a condition of support from SafeHavens Organization, project partners must agree to treat children's disclosures as credible, genuine and truthful,

and such disclosures must be investigated and action in accordance with local law, policy and practice standards.

v. Failure to notify

Any SafeHavens Organization director, employee, contractor, or volunteer who becomes aware of any incident as outlined in 8.3.3 above, and who fails or refuses to follow the Child Abuse Incident Procedure, will be subject to SafeHavens Organization Disciplinary proceedings. Where an individual or organization fails to follow this procedure, and that individual or organization is subject to a formal contract with SafeHavens Organization, that failure will constitute grounds for the cancellation of that contract without prejudice.

As a condition of funding from SafeHavens organization, project partners are subject to loss of financial and other forms of support if they fail to act responsibly or to report the incidents to SafeHavens organization according to the Child Abuse Incident Procedure.

vi. Peer-abuse. The above procedures must apply in situations where the abuse has been committed by one child on another child. However in such circumstances, where appropriate and where the safety and rights of the child can still be assured, SafeHavens Organization will endorse an appropriate therapeutic and/or educational approach rather than a punitive one.

It will be the responsibility of the in-country project partner to plan and assure the provision of such responses.

d. Code of Conduct

i. Scope

All SafeHavens Organization stakeholders, including Board members, employees, contractors, volunteers, and any person who has direct involvement with children under the auspices of SafeHavens Organization, must agree in writing to be bound by the SafeHavens Organization Code of Conduct.

The SafeHavens Organization Board is responsible for ensuring that an adequately detailed Code of Conduct document is created, maintained and included in the SafeHavens Organization Child Protection Procedures document. The current version of this Code of Conduct is appended to this Child Protection Policy.

ii. Publication

The CEO of SafeHavens Organization will make the Code of Conduct available to any person requesting it, and will publish it on the SafeHavens Organization public website.

iii. Breaches

The SafeHavens Organization Board is responsible for responding to any potential breaches of the Code of Conduct. The Board will have the right to terminate the services of any staff member, volunteer, contractor or other person found to have breached the code, subject to applicable employment legislation and procedural fairness principles.

e. Partner Organizations

i. Minimum requirements

SafeHavens Organization will only partner with organizations that:

1. Have agreed in writing to SafeHavens Organization policies and procedures;
2. Have implemented policies and procedures which do not contradict SafeHavens Organization policies and procedures;
3. Possess current authority to operate as a local organization, including all appropriate licenses and permits;
4. Regularly conduct internal reviews to ensure their own compliance to SafeHavens Organization Policies (process facilitated by SafeHavens Organization Operations Manager); and
5. Routinely conduct formal assessments of risks to children in all activities and Programs (reviewed by SHs Director of Child Wellbeing during in-country site visits/contacts).

ii. Capacity Building

SafeHavens Organization will, where practicable, endeavor to provide assistance to partners, to build their child protection capacity.

f. Contracts and Audits

All contracts struck between SafeHavens Organization and any other organization must:

- (i) Include agreement to all relevant SafeHavens Organization policy documents, including but not limited to this Child Protection Policy; and
- (ii) mandate a yearly audit of that organization's adherence to SafeHavens Organization policies, procedures and contractual requirements. These audits will be conducted by a suitably-qualified person or organization agreed to by the SafeHavens Organization CEO.

g. Direct Child Sponsorship and Adoption Policy

- i. SafeHavens Organization does not provide direct financial support to individual children, and does not participate in adoption of children, and does not advocate for adoption outside of the child's indigenous people or culture.

h. Use of children's images

From time to time, photos and images will be collected to document project implementation and possibly be used for fundraising or to inform donors of SafeHavens Organizations activities.

So as not to exploit individual children, SafeHavens Organization will endeavor to protect individual children's identities and to use photographs only to support the children, generally speaking, and to support the programs serving the children in.

Where SafeHavens Organization uses a child's photograph, it will do so using generally accepted practices designed to address risks identified as potentially harmful. These include (as detailed in Communications Policy):

- The child must always be portrayed in a dignified and respectful manner;
- The child must never be portrayed in vulnerable or submissive manner;
- The child must be adequately and appropriately clothed in photography and videos;
- The child must never be photographed in any way which could be reasonably construed as sexually explicit, or sexually suggestive;
- The child should be portrayed as part of their community, participating in activities that reflect their daily lives;
- All local and cultural traditions should be taken into consideration;
- All local laws and guidelines are taken into consideration and adhered to;
- The images and narrative must be an honest representation of the facts and context of the content. SafeHavens is committed to the values of partnership, respect, honesty and to the long-term effectiveness of aid and development.
- The images or video of people in vulnerable situations should focus more on the reasons for and the context of a situation, rather than on an individual's suffering.
- Images and associated information collected and portrayed is strictly relevant to the work of SafeHavens Organization in that community.
- Materials have been obtained in an appropriate, accurate and consensual manner
- No sensitive or overly personal information on the children is to be shared. Good judgment is to be used in ensuring we uphold the principles of respect, dignity and privacy.
- Narratives are to adhere to a tone of voice that is always educational, inclusive, respectful, neutral and empowering;
- Where there is uncertainty on the use of an image or narrative piece after the above guiding principles are applied, guidance is to be provided by the CEO and/or the Child Wellness and Safety Committee.

In addition:

- (i) Origins of any images used will be known and any necessary permissions,

including copyright releases, will be held;

(ii) Care will be taken to ensure that the identification of or use of images of local people will not endanger the people they portray.

(iii) Information which could identify the child must not be used in the publication of the image(s)

(iv) All images must be securely stored and password-protected where applicable. Access to such images must be limited to authorized persons.

9. Definitions

The following terms as used in The Policy are defined in Table 2 below.

Term	Definition
SafeHavens Organization/ SHs	SafeHavens Organization
Bullying	Bullying is the inappropriate use of power by an individual or group against another person. It includes physical abuse, verbal abuse such as insults, taunts, teasing and ridiculing, and psychological abuse such as intimidation and ostracism.
Child Abuse	Includes neglect, and physical, emotional or sexual abuse of a child or young person. Physical abuse includes injury or threats of injury, such as slapping, punching, shaking, kicking, burning, shoving or grabbing, often – but not necessarily – resulting in bruises, cuts, burns or fractures. Emotional abuse includes name-calling, put-downs, emotional withdrawal such that it affects the child's physical or emotional development. Sexual abuse includes non-consensual sexual penetration, inappropriate sexual touching, and exposure to pornography. Neglect is refusal or failure to provide a child with clean water, food, shelter, sanitation or supervision or care to the extent that the child's health and development are placed at risk.
Child and Young Person	A person defined as a child or young person by the legislation relevant to their country of residence. In the absence of any such definition, any person under the age of 18 years.
Child Protection	The systems, processes and activities aimed at preventing or minimizing the risk of child abuse, neglect, or exploitation..
CPP	Child Protection Policy
Domestic Violence	Violence which occurs within family and domestic situations, usually between persons who are related to each other.

The Policy	SafeHavens Organization Child Protection Policy and Child Protection Procedures documents.
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Table 2. Terms and Definitions