

Chapter –16

Child Safeguarding Policy

16.0. POLICY STATEMENT

ITA believes that all children under the age of 18 have a right to protection from abuse or exploitation. ITA will not tolerate any child abuse or exploitation as it goes against the values and mission of organization. Moreover, ITA will comply prevailing national and international laws regarding protection of children e.g. child protection system act (2014), Punjab Marriage Restraint (Amendment) Act 2015, The Child Marriage Restraint (Amendment) Act 2016, prohibition of employment of young children (Factories Act 1934), the Punjab restriction on employment of children act (2016) and UN Convention on the Rights of the Child (UNCRC).

16.1. SCOPE

This policy is applicable to all employees, volunteers, interns, consultants, partners and donors. They are given clear guidance about the standards of behavior and practice required of them at all times when they are in contact with children.

16.2. OBJECTIVES

ITA child safeguarding policy's objective is to prevent the occurrence of any event of child abuse or exploitation and provide the guidelines and SOPs to staff members, consultants, volunteers, interns, donors, partners, and contractors, including the integration of Prevention of Sexual Exploitation and Abuse (PSEA).

16.3. RESPONSIBILITIES

“Everyone is responsible to ensure Child Safeguarding including the Prevention of Sexual Exploitation and Abuse (PSEA)”

All employees must become familiar with the Child Safeguarding and PSEA Policy, all applicable guidelines and procedures to ensure child protection. They must know exactly what their responsibilities are and have the required ability and training to fulfill them.

16.4. PRINCIPLES WHEN WORKING WITH CHILDREN

For the purposes of this policy, ITA defines a child as anyone under 18 years old.

Abuse and exploitation can occur in many different forms and can include:

- Neglect
- Bullying
- Physical, sexual or emotional abuse.

16.4.1. ANYONE WORKING IN OR ON BEHALF OF ITA MUST NOT AT ANY TIME:

- Hit or otherwise physically assault or physically abuse children
- Have sexual intercourse, or engage in any sexual activity, with anyone under 18 years of age, regardless of the age of consent locally or child consent due to any compensation offered against this favor. Mistaken belief in the age of the child is not a defense.
- Not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Act in ways that may be abusive or may place a child at risk of abuse or exploitation.
- Have a child/children with whom they are working to stay overnight at their home, unsupervised, or spend excessive time alone with children.
- Condone, or participate in, behavior of children that is illegal, unsafe, exploitative or abusive.
- Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
- Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child. As part of this I must explain how the photograph or film will be used.
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Sharing of any type of unethical material with children.
- Ensure images are honest representations of the context and the facts.
- Violation of ITA policy, national and international laws regarding children.

16.5. REPORTING PROCEDURES

If there is an urgent child protection situation, for example if a child is in imminent danger of exploitation or abuse, then immediate protective action is recommended. The first priority of anyone who works in ITA to whom child protection concerns are reported must be the immediate safety and welfare of the child.

16.5.1. INTERNAL REPORTING PROCEDURE

It is the responsibility of all who represent ITA, in whatever capacity, to raise their concerns appropriately.

Any person working for ITA who has concerns regarding possible issues of abuse or exploitation in projects managed by ITA, or is aware that an individual working for ITA is committing abuse or exploitation, **must** raise these immediately through their line manager.

- Raise the matter in writing with line manager and HR. If the issue is raised verbally by a child, (eg 16 years old volunteer) the person in receipt of the information must put the matter in writing to their line manager within 24 hours. In case the

complaint relates with line manager, the complainant must report to manager HR / child protection officer at hr@itacec.org and complaints@itacec.org with Child Safeguarding Incident reporting form. The line manager will raise the complaint within 24 hours to the appropriate level of management / manager HR / child protection officer at hr@itacec.org and complaints@itacec.org to investigate the matter.

- Individual's manager will notify the complainant and manager HR/child protection officer once matter has been resolved.
- In case the complaint is against line manager, the complainant register complaint to manager HR / child protection officer at hr@itacec.org and complaints@itacec.org.
- If the person working for ITA is not satisfied or the complaint relates with manager HR or child protection officer, they should contact to the Secretary Board (Mr. Muhammad Asif Sultan at asif.sultan@itacec.org).
- If it is not possible to do this with an immediate line manager due to any reason, issues should be taken to the next level of management.

16.5.2. EXTERNAL REPORTING PROCEDURES

Complaints of this nature raised from outside the organization should use the formal complaints procedures:

- The complaints should be addressed to local focal point or Manager HR in writing through email with Child Safeguarding Incident reporting form at their email addresses or complaints@itacec.org . District manager and office in-charge are designed as Child Protection Officer for respective offices. For the said purpose, contact information of Child Protection Officer should be displayed in office and communicated to stakeholders.
- Manager HR / Child Protection Officer is responsible for responding to complaints about ITA's programs, staff, contractors, consultants, interns and volunteers.
- If a matter is raised verbally from outside the organization with anyone who works for ITA (volunteer, interns, employee, contractor, consultant), the person in receipt of the information must put it in writing immediately to their manager/local focal point. If the complaint is against line manager, the complainant should contact with manager HR and child protection officer at hr@itacec.org or complaints@itacec.org.
- If the complaint is about the Manager HR, complaint should be directed to the Secretary Board (Mr. Asif Sultan at asif.sultan@itacec.org).
- Any concerns raised will be treated with the absolute confidentiality and without delay.

If there appears to be a situation of abuse in a partner organization, vendors, contractors one outcome may be to withdraw or pull out of the networking/partnering relationship.

16.5.2. DEALING WITH DISCLOSURE, SUSPICION AND ACCUSATION

ITA recognizes that disclosures (i.e. when a specific allegation of abuse or exploitation is made against a named individual) and suspicion (i.e. when concern is expressed about abuse or exploitation that may have taken place or be in prospect) should always be investigated and acted upon swiftly.

In this regard, the welfare of children is the paramount consideration. Any information offered in confidence to ITA staff member or volunteer should be received on the basis that it will be shared with the relevant person in authority: this will in the first instance be a line/senior/HR manager. In case of any violation regarding confidentiality, strict disciplinary action should be taken against the person who share the complaint content with anyone other than concerned person. ITA will ensure the safety of complainant from all sort of negative consequences.

16.5.2.1. IF YOU SUSPECT A CHILD IS BEING ABUSED PHYSICALLY, SEXUALLY OR EMOTIONALLY

- Keep calm. Do not say or show that you are shocked and try to act normally.
- Do not investigate and do not question the child. If a child reports exploitation or abuse directly to you, only ask questions in order to get just enough information to prepare the complaint e.g. 'who, what, where, when' questions, but not 'why' questions.
- Do not challenge parents, guardians or teachers about your concerns and don't make any judgment
- Record all the details that support your suspicion. Report as soon as possible (within 24 hours) to your line manager. Sign, date and keep a copy.

Never agree to keep a secret. You must inform the relevant persons.

16.5.2.2. IF THERE IS AN ALLEGATION OF ABUSE OR EXPLOITATION MADE AGAINST YOU

If the complaint or allegation is against you, inform your line manager immediately (within 24 hours). Record all the details as you know them. Sign, date and keep a copy for yourself, and send a copy to local focal point/line manager/child protection officer/manager HR.

The person will be asked to take leave from their duties on full pay until an investigation has been completed. After investigation, if the allegations are proved, strict disciplinary action should be taken which may include termination of employment. Otherwise, the said employee should be reinstated on the same position.

If ITA volunteer is the subject of an allegation of child abuse, that volunteer will be asked to withdraw from their work until an investigation has been completed. In both cases, it should be made clear that suspension does not imply guilt but rather protects all parties while an investigation is undertaken.

16.6. GUIDELINES

16.6.1. MANAGERS WHO RECEIVE REPORTS/COMPLAINTS OF CHILD ABUSE OR EXPLOITATION

- Act without delay. Always take complaints of this nature seriously and report to local focal point/office in-charge/child protection officer/manager HR within 24 hours.
- Local focal point/office in-charge involve HR Manager if they are going to suspend or move an employee.
- Respect confidentiality. Only pass information on to a person who needs to know, either for the purposes of protecting a child, or investigating the complaint. In case of any violation regarding confidentiality, strict disciplinary action should be taken.
- Discuss with HR whether it's appropriate to approach the parents of the child. Also consider (e.g. in the case of a 16 or 17 years old) whether to ask the child's consent to approach their parents. The child's welfare is the priority.
- Evaluate the allegation. Many (but not all) will need a formal investigation. If necessary, undertake initial fact finding (but do not confront the subject of the allegation).
- If you decide to investigate must inform manager HR/child protection officer.
- Commission an investigation via district/provincial HR Officer/local focal point.
- Normal practice is to suspend an employee during such an investigation.
- Protect those involved: witnesses, complainant, and subject of complaint.
- The most senior manager in the location and child protection officer should be the decision maker. They can take support from manager HR.
- Follow up. If the allegations are proved take appropriate action, for example reporting the matter to local police, dismissing the employee or ending the relationship if they are a volunteer, vendors and contractors. Take local legal advice of child protection unit (e.g. Child Protection & Welfare Bureau) or any other organization working for the protection of children
- Report to HR via your district/provincial manager or head of department.
- Manager HR / child protection officer is responsible to report any such issue to program manager for communication with donor within 24 hours of the receipt of any complaint.
- Follow up with complainant if possible.

If the complaint is about a partner organization, work with them to identify a 3rd party to conduct the investigation. If the outcome is that child abuse or exploitation has occurred, ongoing work with the partner organization cannot include the individual concerned. Consider referral to the police or other statutory authorities for a criminal investigation and prosecution under the law of the province/district where they work.

16.7. GOOD PRACTICE WHEN WORKING WITH CHILDREN

It is inappropriate to:

- Spend excessive time alone with children away from others.
- Take children to your own home, especially where they will be alone with you.
- Develop relationships with children, which could in any way be deemed as exploitative or abusive.
- Use language, make suggestions or offer advice which is inappropriate, offensive or abusive. This could be verbally or via email or text message.
- Behave physically in a manner that is inappropriate or sexually provocative.
- Sleep in the same room or bed as a child with whom you are working.
- Do things of a personal nature for children, which they can do for themselves.
- Discriminate against, show different treatment to, or favor particular children to the exclusion of others.
- Make pictures and videos of children / beneficiaries in personal/mobile camera.
- Use of any picture/video on any sort of media particularly personal social media platforms as staff members/volunteers/inters etc. are bound to forward all such information to relevant program manager/marketing team to upload updates on social media. No one is allowed to use their personal social media to upload any kind of activity.

When in contact with children under the age of 18:

- Be aware of situations, which may present risks and manage these.
- Plan and organize the work and the workplace so as to minimize risks.
- Be visible to others when working with children whenever possible.
- Be open. Create and maintain a non-defensive attitude and an open culture in which to discuss any issues or concerns.
- Foster a culture of mutual accountability so that any potentially abusive or exploitative behavior can be challenged.
- Develop a culture where the children can talk about their contacts with staff and others openly.
- Respect each child's boundaries and help them to develop their own sense of their rights as well as helping them to know what they can do if they feel there is a problem.
- Always use official camera to capture pictures/video. Forward program activities/updates to designated staff members e.g. program manager or marketing team to upload on social media.
- Provide necessary information to parents/children to take consent for using children pictures/videos on printed material / social media.
- Adhere ITA's policy, national and international prevailing laws regarding child safeguarding e.g. child labor, child marriages, child rights etc.

16.7. PREVENTION OF ABUSE AND EXPLOITATION AND RAISING AWARENESS OF THE POLICY

Working with Children

All managers are expected to adhere to ITA's *Recruitment Policy* when recruiting people to work with children. Although abuse and exploitation of children can occur anywhere, it is recognized our beneficiaries may be particularly vulnerable in this respect.

All employees must sign appointment letter stating that;

- I will not abuse or exploit children (under the age of 18) in any way and will report any such behavior of others to my line manager/local focal point/child protection officer/manager HR.

Moreover, it is mandatory for all employees, visitors, volunteers, interns and donor representatives to sign acknowledgement form (child safeguarding) before interacting with children. It is the responsibility of both line manager and HR & Admin officer to ensure provision of policy guidelines and take signature on acknowledgement forms. In addition to that volunteers working in partner organizations to conduct any kind of survey on behalf of ITA or using the name of ITA/ASER Pakistan must sign acknowledgement form before representing ITA/interacting with children. For the said purpose, respective program manager is responsible to ensure strict compliance.

Breaches of this policy or the Code of Conduct will be dealt with under the disciplinary procedures and appropriate disciplinary action should be taken.

Any employee who enters into commercial sex transactions or engages in sexual behavior with anyone under the age of 18 will be considered as having committed a disciplinary offence and will be dealt with under the disciplinary procedures.

If ITA employee is found to have committed acts in relation to children and young people which are criminal or which contravene the principles and standards set out in this policy, ITA will take disciplinary action and or any other action that may be appropriate to the circumstances. If volunteers, consultants or contractors are found to have committed such acts, the volunteering, consultancy or contract relationship will be ended. This policy also covers the individual's code of conduct during office hours, field visits, leaves etc. and any violation of prevailing laws and this policy should be dealt strictly. Furthermore, it also covers the violations by family members/at home e.g. child labor, exploitation, neglect etc. It is further clarified that employees, interns, volunteers, partner organizations and vendors must adhere ITA policy, national and international laws pertaining to child safeguarding.

Anyone working with ITA who is disciplined or dismissed for such an offence must be referred to the child protection authority. This also covers people who choose to leave pending an investigation.

Employees/volunteers/interns/consultants/contractors/partner organizations and their staff members will be made aware of this policy in a number of ways;

- The child safeguarding policy statement will be included in employee orientation pack, (which is sent to all new employees). Moreover, everyone who represents ITA should sign child protection policy.
- **In case of child protection officer/Manager HR is on leave, Secretary Board will serve as child protection officer.**
- Volunteers/inters/consultants/partners/donors will be made aware of child protection guidelines via appropriate communications channels.

- Managers are responsible for including child protection issues in recruitment and selection process particularly during induction and ongoing performance management for relevant posts.
- ITA's expectations regarding the sexual behavior of their employees are required part of induction for all post. Accordingly, questions related to child protection must be asked from candidates during interviews.
- ITA reference check process should contain question regarding the code of conduct/behavior with children.

16.7. CHILD SAFEGUARDING COMMUNICATION

In order to prevent increasing the vulnerability of beneficiaries in our campaigning, advocacy and general communications work, the following approach applies:

- ITA has a **duty of care** to protect children even if they are willing to participate and voice their concerns. Therefore, any image or recorded case history of a child must not place him/her at risk or render him/her vulnerable to any form of abuse or exploitation.
- In most cases, the story of a child can be told through application of our existing guidelines on informed consent, however, there are some key areas where ITA needs to be extremely alert and sensitive to child protection issues. In these cases, the **identity** of children, under the age of 18, must not be revealed.
- It is important to seek advice from program staff as a means of ascertaining the age of the interviewee (as sometimes it is difficult to determine).
- This applies, even if a parent/guardian gives **informed consent** for a child to be interviewed in a way that reveals their identity. ITA staff make sure that parents are provided necessary information at the time of signing consent form for using pictures, videos, and identity of their child on social media and project material etc. In case of non-compliance, strict disciplinary action will be taken against the involved staff member(s).
- Staff members, volunteers, interns, interviewers, consultants, and donor/government representatives are not allowed to take pictures in their personal cameras. They are advised to use official camera for all sort of pictures/videos etc.
- A story gatherer (interviewer, photographer or video-maker) should therefore **exercise judgment** and creative skills to tell a powerful story in a way that doesn't reveal a child's identity.
- **Sign off** procedures are clear, with appropriate levels of sign off authority applied to content gathering and creative execution phases.

16.8. INCORPORATING CHILD SAFEGUARDING INTO PROGRAMME WORK

All employees and representatives should aim to:

- Plan and organize the work and the workplace so as to minimize risk of abuse, exploitation or harm coming to a child.
- In a program involving children, program manager will also act as Child Protection Officer whose role includes child safeguarding over other program commitments.

- Promote a culture of openness in relation to child safeguarding issues, where any issues or concerns can be raised and discussed.
- Ensure that a sense of accountability exists between staff so that poor practice or potentially abusive or exploitative behavior can be challenged.
- Talk to children about their contact with staff or others and encourage them to raise any concerns.
- Empower child beneficiaries and communicate to them their rights, what is acceptable and unacceptable, and what they can do if there is a problem.
- Communicate to child beneficiaries what standards of professional practice they can expect of ITA staff and what to do if they feel that anyone who works with ITA is falling short of these standards.
- Conduct risk assessment and formulate mitigation strategies at all stages including program designing, implementation and reporting. Program manager/coordinator is responsible to conduct risk assessment with the help of program/district teams. Manager HR is responsible to provide approved format to conduct risk assessment and support to program teams regarding risk assessment.
- ITA maintains risk register to keep complete record of associated risk and mitigation strategies.
- Program managers and Child Protection Officer review risk register and implementation of child safeguarding policy and mitigation strategies.