



Institutional policies

Child Safeguarding Policy

Risk and Audit Department
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1. Introduction

Through this Child Safeguarding policy, HI wishes to contribute to the improvement of the situation of all children by promoting their rights as set out in the [United Nations Convention on the Rights of the Child](#).

HI hereby expresses its determination that its employees, activities and communications should not harm children by exposing them to risks of harm and abuse.

HI wishes to promote the following values through this policy:

- All children have the right to be protected from abuse and exploitation.
- All adults have a responsibility to support and protect children and must act in the child's best interests.
- Humanitarian and development organisations have a duty of care to children with whom they or their representatives come into contact in the course of their work. They must do their utmost to provide children with the support they need and to contribute to a protective environment.
- Children are responsible for their own protection and development, but this does not absolve educators and parents of their responsibilities.
- By virtue of its mandate, HI ensures that diversity and inclusion are continuously considered in its organisation and activities: special attention is given to children with disabilities or in extremely vulnerable situations (minorities, refugees), who have the same rights as other children. They may be more vulnerable when interacting with our organisation due to the various forms of discrimination, abuse, neglect or isolation to which they are often subjected, and they have the right to be protected, to live and to develop within their family and community.

Application

This policy applies as much to HI as an institution as to any person collaborating with HI and in particular:

- People who have a temporary or permanent employment contract with HI;
- Families accompanying international staff;
- HI boards Trustees;
- Consultants or advisers;
- Trainees and work-study students;
- International or community volunteers;
- People invited to the premises or to programmes.

This policy applies to all situations, professional or otherwise, both at work and outside of work.

It shall also apply within the framework of contractual agreements:

- Partners: non-governmental and civil society organisations, consortium members led by HI;
- Service providers and companies under contract with HI.

Through the leadership of its managers, HI ensures that everyone working with it is aware of the existence and content of this policy. HI's senior managers are also at the forefront of driving the cultural changes brought about by the policy, including the setting aside of time for discussion of child abuse and maltreatment prevention in board thematic groups or the appointment of board members as safeguarding leads.

Frame of reference

This institutional policy is part of HI's overall [Safeguarding framework](#). It is linked to the [Policy for the Protection of Beneficiaries from Sexual Exploitation, Abuse and Harassment \(PSEAH\)](#) and to the [Code of Conduct](#). It also respects the principles of promoting gender balance and diversity within the organisation as defined in HI's [Disability, Gender and Age Policy](#).

It is based on several recognised international standards, such as:

- [The International Convention on the Rights of the Child \(UNCRC - 1989\)](#) and its 3 additional protocols ¹
- [International Labour Conventions \(No. 138 and No. 182\)](#) concerning minimum age for child labour (1973) and the abolition of the worst forms of child labour (1999), as well as their recommendations No. 146 and No. 190.
- [International Child Safeguarding Standards](#) for Organisations - Keep Children Safe 2024
- [UNCRPD - Convention on the Rights of Persons](#)
It is associated with the standards relating to the fight against sexual exploitation and abuse:
- [IASC - 6 Fundamental principles](#)
- [UN Secretary-General's Bulletin 2017](#): official reference framework for SASH in UN agencies. UN Secretary-General's Bulletin [2025](#) on SASH
- [CHS - Core Humanitarian Standard \(PSEA Index\)](#)

¹ [Protocol on the involvement of children in armed conflict](#) (2000); [Protocol on the sale of children, child prostitution and child pornography](#) (2000); International procedure for a child to lodge a complaint about a violation of his or her rights directly with the United Nations Committee on the Rights of the Child.

On the other hand, HI respects, and in general undertakes to strengthen, the culture, traditions and practices of the communities in which it works; and to comply with the legislation in all its intervention sites, whenever this does not infringe human rights and in particular children's rights. However, our policy and procedures may differ from local laws and impose more stringent standards. **The requirements of this policy take precedence where it is stricter than local legislation** and complement any other legal obligations in force about child protection.

2. Reference Definitions 2

Child

The Convention on the Rights of the Child (UNCRC) defines a child as anyone under the age of 18 (Article 1).

However, Article 12 recognises that childhood is not a uniform reality, and that children's capacities evolve with age. Therefore, although the age of majority is set at 18, the concept of childhood can be interpreted flexibly according to socio-cultural and legal contexts.

HI recognises that childhood is both a universal concept and a social construct - but will apply the IASC standard that a **child is defined as any person under the age of eighteen** in all its Safeguarding Policies and Guidelines.

Child abuse³

Child abuse is a generic term covering all forms of physical or emotional maltreatment. In particular, sexual abuse, neglect or exploitation involving potential or actual harm to a child's health, survival, development or dignity, especially in the context of a relationship of responsibility, trust or power.

2.2.1 - Physical abuse: Actual or potential physical harm inflicted by another person, adult or child. Examples include blows, shocks, poisoning, drowning and burns.

2.2.2 - Emotional abuse: Ongoing emotional maltreatment that affects the child's emotional development. Acts of emotional abuse include restricting freedom of movement, degrading, humiliating, intimidating behaviour (including cyberbullying),

² The list of definitions is not exhaustive. All definitions are available in the [HI Protection Framework glossary](#)

³ Reference: [International Standards Keep Children Safe](#).

threats, acts designed to cause fear, discrimination including racism, ridicule or other non-physical forms of hostile treatment or rejection.

2.2.3 - Sexual abuse: Coercing or inducing a child to participate in sexual activities that he or she does not fully understand and to which he or she has little opportunity to consent. This can include, but is not limited to, rape, oral sex, penetration or non-penetrative acts such as masturbation, kissing, fondling and touching. It can also include involving children in viewing or producing sexual images, watching sexual activity and encouraging children to engage in sexually inappropriate behaviour.

Sexual exploitation of a child

This is a form of sexual abuse in which children are involved in sexual activity in exchange for money, gifts, food, shelter, affection, social status or anything else that they or their families need. It usually involves the manipulation or coercion of a child, which may include befriending them, gaining their trust and subjecting them to the use of drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power that limits the victim's choices. It is a form of abuse that children may misunderstand as consensual.

Sexual exploitation of children manifests itself in different ways. It may involve an older perpetrator exercising financial, emotional or physical control over a young person. It may involve peers manipulating or coercing victims into sexual activity.

Neglect

Considering the context, resources and circumstances, neglect refers to the persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in serious harm to the child's physical, mental, moral and spiritual development. This includes failure to adequately supervise and protect children from harm, and failure to provide them with food, shelter and safe living and working conditions. It may also include neglect and abuse of a child with disabilities.

Commercial operations

Exploitation of a child in the context of work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or socio-emotional development. This includes, but is not limited to, child labour.

Child labour

Child labour is governed by the UNCRC and the International Labour Organisation (ILO) Convention 138, which sets a number of age limits, including the following:

- The minimum age for admission to employment or work shall not be less than the age at which compulsory education ends and in no case less than **fifteen years**.
- His minimum age shall not be less than eighteen years for employment or work which, by its nature or the conditions in which it is carried out, is likely to jeopardise the health, safety or morals of children.
- This age limit may be raised to sixteen if the safety and morals of the young people concerned are fully guaranteed and if they have received specific and appropriate instruction or vocational training in the branch of activity concerned.

In this policy, child labour refers to the employment and work of children under the age of fifteen.

Participation of children in light work: This refers to a child's participation in a one-time paid activity that does not affect his or her health or development and does not interfere with his or her education or vocational training. Participation in light labour is not permitted for children under the age of twelve (Convention 138).

Best interests of the child

The 'best interests of the child' include the child's physical and emotional safety (well-being) and right to positive development. In accordance with Article 3 of the United Nations Convention on the Rights of the Child (UNCRC), the best interests of the child must be at the centre of all decisions and actions taken and of the way in which service providers interact with children and their families.

3. Fundamental Principles

Principle 1 - Protect children

This means applying the principle of 'do no harm' by ensuring that actions and interventions designed to help the child (and their family) do not expose them to further harm. At every stage of the organisation's relationship with the child and/or family, HI is committed to ensuring that they do not suffer harm because of the behaviour of staff, decisions made, or actions taken on behalf of the child or family. HI is committed to protecting children from all forms of harm and abuse, including sexual exploitation and abuse, physical abuse, emotional abuse and neglect, intentionally or unintentionally inflicted on them by the organisation's staff and collaborators.

Principle 2 - Zero tolerance of abuse

HI is committed to the rights of children and reaffirms its policy of zero tolerance towards abuse of children. In particular, sexual exploitation, abuse and harassment of children, as defined in HI's PEAHS, will not go unpunished and will be systematically investigated and disciplinary action taken.

You are also reminded that:

- Sexual relations with anyone under the age of eighteen are prohibited, regardless of the age of majority or local age of consent. Ignorance of the actual age of the child is not a defence (Principle 3 PEAHS).
- It is forbidden to demand sexual favours from a child in exchange for money, employment, goods, services or any other form of assistance. This includes the use of prostitution and any form of transactional sex (Principle 4 PEAHS).
- It is strictly forbidden to produce, possess or view child pornography.

Principle 3 - Reduce the risks related to child labour

In line with the definitions of work in the previous chapter, HI is vigilant about age limits, particularly with regard to maintaining children's access to education and training. In addition, HI takes care to employ people over the age of eighteen (+18) in accordance with national legislation and encourages all people working with it to respect this rule. Special attention is paid to suppliers who employ minors, particularly in the transport and construction sectors, to ensure compliance with age limits and working conditions.

Principle 4 - Putting the best interests of the child first

HI is committed to ensuring that the best interests of the child are assessed and considered when making decisions. This refers to the child's well-being and is determined by various individual circumstances (age, maturity, presence or absence of parents, child's environment and experiences). HI staff and collaborators must continually assess the risks and resources of the child and their environment, as well as the positive and negative consequences of actions, and discuss these with the child and their caregivers when making decisions. The least harmful course of action should be preferred. In the case of an incident involving one or more children, the best interest's principle should guide all decisions made during the incident management process.

Principle 5 - Ensure informed consent and control of communication's risks.

Anyone working with HI must consider the risks to children in relation to the use of their data and images and their consent to their use. The strategy for reducing these risks must be an ongoing concern for everyone. In compliance with the internal guideline on collection of testimonies⁴, HI is committed to systematically obtaining the informed consent of the child⁵ and his or her adult referee and to implementing specific measures to protect the child when his or her image and voice are used in a context that must never be demeaning or discriminatory. The main measures are detailed in the following chapter on operational procedures (risks) and the behavioural expectations in the organisation's code of conduct. (*communication chapter*).

Principle 6 - Work together with our partners and communities

HI is committed to working with our partners to ensure that minimum child protection standards are implemented. We will also include prevention measures in our communications with partners, paying particular attention to children with disabilities and children who are discriminated against because of their vulnerability.

When HI is alerted to violence against children in communities where we work, but which is not directly related to our interventions (HI and partners), systematic referral to institutional and/or non-governmental organisations specialising in child protection is proposed and/or implemented.

Principle 7 - Transparent and accessible reporting procedures

HI is committed to promoting the principles of transparency and access to clear and robust reporting procedures. This includes awareness raising and training for all those working with HI so that they understand the principles and provisions of this policy, the whistleblowing procedures and their follow-up. It also includes an ongoing commitment by staff and their managers to ensure appropriate access to information and whistleblowing procedures for children, with a requirement for all HI programmes to produce child-friendly tools in addition to those suitable for people with disabilities. (See chapter 4.3).

⁴ internal guideline on collection of testimonies (internal document only)

⁵ Informed consent comprises 3 elements: understanding, voluntariness and explicit authorisation.
CHS Alliance – SEAH Investigation guideline.2022

Principle 8 - Protection of whistleblowers and child survivors of abuse

HI is committed to providing support to whistleblowers who report behaviour contrary to this policy, as well as specific support and assistance to children and their families who are victims/survivors of discrimination, violence, exploitation, sexual abuse or harassment or any other form of abuse perpetrated by anyone working with HI, in accordance with the principle of a victim/survivor-centred approach,

Victims/survivors will be informed that the perpetrators of sexual exploitation, abuse or harassment remain fully responsible, although the internal investigation process will be impartial to ensure that all parties have an equal right to be heard.

Where there is a conflict of interest between the child victim/survivor and another person involved, the best interests of the child and his/her views (or those of a third adult) shall be the primary consideration in the handling of the case, particularly where the child and/or his/her family are at additional risk of physical and/or emotional harm.

4. Implementation and procedures

4.1 Recruitment, contracts, induction period

4.1.1 Recruitment

HI implements a safe recruitment process for anyone applying for employment with HI (temporary or permanent), HI Board Trustees, consultants, interns and volunteers (all categories). This includes key information about the values and existence of the policy in job advertisements, then specific questions during interviews.

In the case of applications for positions involving close contact with children, specific questions relating to child protection principles and behaviour with children are asked during interviews with Human Resources and Technical Advisors.

Once the candidate has been selected, a rigorous background check process is put in place. The successful candidate for an international or national position will be subject to:

- A criminal record check (subject to local legislation)
- Reference checks from previous employers, including a history of sexual harassment, abuse, exploitation or child abuse investigations in accordance with the protocol of the [Misconduct Disclosure Scheme](#) (MDS) of which HI is a member.
- A 'Bridger' check is also carried out to detect any illegal activity (candidates for field positions and certain HQ roles).

These rules also apply to community volunteers in most programmes. In some contexts, reference checks for these volunteers will need to be adapted due to security or crisis constraints (e.g. refugee workers with no accessible background, etc.). This could include a systematic check if the volunteer has already worked with another NGO or through the camp authorities.

4.1.2 Contractual requirements

All staff members working with HI are required to sign a contract which includes adherence to the [Code of Conduct](#) and institutional policies:

[Protection from Sexual Exploitation, Abuse and Harassment](#) (PSEAH); Child Safeguarding Policy; [Anti-Fraud, Bribery and Corruption Policy](#). Individuals who do not have a formal contract, such as volunteers or trustees, are required to sign the Volunteers or Trustees Charter, which includes to comply with the Code of Conduct and institutional policies.

All contracts with partners (subcontractors, implementing partners) refer to the above HI policies. Aspects relating to their own recruitment and reference procedures are an integral part of HI's partners capacity assessment to ensure alignment with standard norms.

4.1.3 Induction period

All new HI members must complete mandatory initial online training on **the Code of Conduct and Safeguarding Institutional Policies**. This training must be completed every 2 years. It is also provided in an editable format and can be translated into the local language or contextualised for local training supported by Focal Points.

In addition to this induction, HI has developed a comprehensive safeguarding training plan to provide all staff with access to the basics and to reinforce the culture of preventing and reporting abuse.

Throughout the year, the Safeguarding Unit provides various categories of training for focal points, MEAL officers, first responders to disclosures and managers. The pool of investigators also benefits from specific sessions on case management and alert procedures. In addition, several tools for training, awareness raising or individual capacity building are available on the organisation's intranet: tutorials, advice, links to external resources including access to the *United Nations Convention on the Rights of the Child (1989)*, including its optional protocols, which form the benchmark for our Child Safeguarding policy. Finally, all staff will benefit from awareness-raising or refresher sessions on the Code of Conduct, protection mainstreaming, GBV issues, sexual exploitation of children and age, gender and disability intersectionality during the period of operation.

4.2 Risk prevention and management

HI continuously assesses the risks of abuse in its organisation and implements measures to prevent and manage these risks through the following actions:

- As stated in the Recruitment and Training chapters, the use **of reference checking mechanisms and adapted recruitment processes to prevent the recruitment of perpetrators of sexual exploitation, abuse or harassment includes any abuse of children.**
- **Mainstreaming Protection** by promoting protective measures against sexual exploitation and abuse/violence against children (training, risk management, due diligence, reporting, detection and verification) into the culture, design and functioning of offices, operations and projects/programmes.
- **Understanding, reducing and managing the risk of sexual exploitation and abuse / violence against children:** The organisation regularly assesses and monitors the risk of sexual exploitation and abuse of children, based on an understanding of the local implementation context, the working environment and the specific vulnerabilities and needs of children (among others concerned groups). This includes an annual SEAH ranking of the countries in which the organisation works, some targeted training and awareness campaigns, some measures to reduce power imbalances and the implementation of risk assessment and prevention measures in projects (including the provision of a risk identification, management and mitigation tool). Project evaluations or satisfaction surveys are also used to monitor the effectiveness of the modalities in place and to monitor changes in programmes and operations.
- **Specific attention to the risks of using a child's image**
To ensure the confidentiality and protection of any child who is photographed or filmed, or when using a child's photograph or story in the course of their work, particularly for promotional, fundraising and development education purposes, HI staff and volunteers must:
 - Ensure that they respect any local traditions or restrictions regarding the reproduction of personal images before photographing or filming a child.
 - Obtain the informed consent of the child and/or the child's parent or guardian to photograph, film or record the child's story. The purpose of the photograph, film or story should be explained.
 - Ensure that photographs, films and videos show children with dignity and respect and not in a vulnerable or submissive position. Children should be dressed appropriately and not in poses that could be considered suggestive.

- Ensure that images and stories are honest representations of context and facts.
- Ensure that file names, metadata and descriptive text do not reveal information that could identify a child when images are sent electronically or when images or stories are published in any form.
- **Involvement of affected communities in designing prevention mechanisms and reporting incidents of sexual exploitation and abuse:** HI ensures that children and young adults, people at high risk of sexual exploitation and abuse, affected communities and others in contact with projects/programmes can report the risks of sexual exploitation and abuse they face and contribute to the design of prevention and response measures. HI encourages the creation of spaces within its programmes for children to raise these issues, particularly those relating to communication methods and safety.

4.3 Incident reporting and management

4.3.1 Report

If a person wishes to raise a concern or report sexist behaviour, gender-based harassment, sexual harassment, abuse or exploitation, or violence and abuse against children, they can do so either through standardised internal reporting or through external channels adapted to each country of operation. In practice, this means reporting concerns or suspicions immediately and in good faith, without taking the initiative to investigate the matter themselves to gather evidence or prepare a report.

No sanction can be taken against a whistleblower (except in malicious cases) in accordance with HI's *Whistleblower Protection Policy* (Ref 4.3.2).

Internal reporting: This can be done by informing senior management verbally, by email or via the organisation's intranet.

- Alert the line manager directly or any other manager in the organisation.
- Report the situation to a Safeguarding Focal Point: staff identified and trained either locally or at Head Office.
- Or [report via the direct online reporting mechanism](#) - Ethics Point - via the HI intranet or website.

It is strictly forbidden for any HI employee, and in particular any manager, to impose a hierarchical or single reporting channel on any other employee. Similarly, all HI managers are required to report any concerns they receive to the EthicsPoint platform.

External reporting channels: in each country where HI operates, a community-based feedback and complaints management system is in place for the people who benefit from the work of the organisation and its partners. This system is designed in accordance with *HI's guide to setting up a feedback and complaints management system*⁶. This system is implemented with the participation of the affected populations and offers a combination of different feedback channels while ensuring the principles of a survivor-centred approach, accessibility, security and transparency. To gather children's views and opinions during community consultations, specific methods can be used with appropriate technical support, such as body mapping or storyboarding, to allow children to express what they think about HI teams and how they like to communicate⁷.

HI's Programme Directors and Country Managers ensure that these mechanisms are in place and that communities are informed, involved and held accountable. MEAL teams, protection officers and other protection actors are directly involved in informing and raising awareness among communities and partners. They are responsible for receiving feedback and complaints through the various mechanisms, helping to consolidate data in accordance with the procedure and following up with reporters on the progress of their complaint.

4.3.2 Incident management with a survivor/victim-centred approach

The organization has a [strict whistleblowing policy](#) and a [reporting flowchart](#) based on the confidentiality and security of the collected data.

As mentioned above, all complaints relating to cases of sexual exploitation, abuse or harassment or child abuse are received directly or registered on a secure case management platform with limited access, protected by an individual password and where all data is archived (Ethics Point). The management of an incident must always respect 4 key principles: **focus on the survivor/victim (which includes the principle of the child's best interests), procedural fairness, professional and certified resources, and structured investigations**

As described above, HI applies the principle of a victim/survivor-centred approach. Once a safeguarding risk, suspicion, incident or allegation is reported (through existing channels), the first step required of the HI frontline worker is to treat the whistleblower appropriately and with critical attention to the survivor (whistleblower or not). Specific Operational Procedures⁸ for dealing with SEAH and child abuse cases committed by our employees & collaborators are available to help first responders manage the situation.

⁶ Guidance on [how to set up a returns and complaints management system](#) (internal document only)

⁷ Tool Sheet: [How to make accountability mechanisms inclusive and accessible to affected populations](#) (internal document only)

⁸ SoP for handling a Safeguarding Incident : [Specific Operational Procedures](#) (internal document only)

For children and adolescents - initial contact is made with the whistleblower and/or survivor within 48 hours and additional contact is made with the child's relative to arrange appropriate care and protection (health, MHPSS, legal, other) by HI directly or through referral to specialist services / stakeholders. A liaison officer is proposed - responsible for monitoring and supporting the survivor and caregiver (family or other).

Particular attention is paid to survivors from specific groups:

Cases involving children with disabilities: All incidents involving persons with disabilities, particularly children, are treated with the highest safeguards to remove barriers that prevent them from accessing the services and information to which they are entitled. First responders, liaisons and subsequent investigators will tailor their communication and follow-up arrangements to the best interests of the child. Access to appropriate health care (including reproductive health care) is closely monitored by HI, particularly in cases of SEAH. Finally, in the case of children with mental disabilities or limited capacity to express their rights and autonomy, specific arrangements are made with the family, community or even the authorities to ensure their protection and management.

Cases concerning groups of children or young people at high risk of discrimination: Certain groups/persons are more likely to face discriminatory attitudes due to the social, religious or political norms of a community: adolescents or young adults involved in prostitution, ethnic minorities, adolescents or young adults who are members of the LGBTQIA+ community. Their reports and situations will be treated with the utmost guarantees of safety, protection and respect. First responders, liaison officers and investigators represent HI's core values of non-discrimination through their attitudes. Specific security measures may be put in place in consultation with the HAS (HI Security Unit) where certain traditional rules or national laws may pose a significant threat to these groups.

The investigation process is conducted in accordance with the organisation's *internal investigation policy*⁹ and in particular with the clauses relating to whistleblower protection and the survivor-centred approach. During and after the investigation process, a case management committee is responsible for, among other things, agreeing and monitoring the level of follow-up protection required for survivors, witnesses and affected community members; implementing measures to control and limit the interaction of the employee(s) subject to the complaint with survivors and witnesses; and ensuring that decisions to protect survivors are taken and implemented.

⁹Investigation Guideline [HI Internal Investigation Guideline](#) (internal document only)

4.4 Suspensions and disciplinary sanctions

4.4.1 Suspensions

If an employee is the subject of a credible report of sexual harassment, abuse or exploitation of adults or children, he or she will be suspended immediately until the allegations have been investigated internally in an impartial manner and appropriate action taken. In cases where suspension is not possible due to local legislation, HI may prohibit access to the organization's premises, equipment and activities while the allegations are investigated, and appropriate action taken. In certain cases, where premature implementation of the suspension may jeopardize the safety of the whistleblower or victim or prejudice the gathering of evidence, HI reserves the right to decide, in consultation with the investigators, the period and safeguards to be anticipated before informing the whistleblower of the suspension.

In accordance with the same principles, HI may ask its partners to suspend or sideline the person involved while it investigates and takes appropriate action.

4.4.2 Sanctions

At the end of the investigation process, the report will be submitted to the Director and the Human Resources Manager/Director of the geographical area or headquarters concerned, as well as to the HQ Safeguarding Unit Specialist. If a breach of the Code of Conduct, the PSEAH and the Child Safeguarding Policy is confirmed, the person(s) concerned will be disciplined in accordance with the seriousness of the misconduct and the applicable legal and internal procedures. **Disciplinary action may range from a formal verbal warning to dismissal for gross misconduct.**

For the same reasons, HI will formally request the partner organisation to take appropriate action against the subject of the complaint.

Any malicious or offensive statement made against a person holding a contract of employment with HI (temporary or permanent), family members accompanying international staff, HI trustees, consultants, trainees or volunteers may also be investigated and lead to appropriate action, including disciplinary action.

As part of its legal obligations, HI reserves the right to report matters of a criminal nature to the local authorities, respecting the rights and consent of victims/survivors and in consultation with them. In all cases HI will not interfere with local legislation and will do its utmost to ensure a fair legal process both for the survivor/victim and if a local or international staff member is implicated in a violation of their fundamental rights.

As part of its contractual obligations, HI will inform the agencies (donors) funding the project concerned of the initial receipt of the allegation and the conclusions of the investigation. This will include the decisions taken in accordance with the rules set out in the organisation's *internal investigation guideline* (donor section).

4.5 Confidentiality

Confidentiality is paramount in all matters relating to this policy. This means that no information reported by children and/or others about any form of child abuse should be made public without the prior consent of the child, their parents, legal guardian and/or the person who reported it. Confidentiality refers to the sharing of information on a 'need to know' basis. This means limiting sensitive information and sharing it only with those who need to know in order to protect the child. Failure to comply with this principle of confidentiality may result in sanctions.

HI will ensure that the children concerned (and their families) are protected and kept informed of the process put in place to deal with the incident and its consequences. Suspicions, allegations or disclosures will be recorded in writing. Reports will be as accurate as possible and should include an accurate account of the facts, their chronology and the action taken. All reports will be kept in a locked location with access restricted to the [Regional] Programme Director or Country Manager, under the control of the Head Office (Geographical Director and Human Resources Director). Confidentiality must be maintained at all times when information is transmitted orally or electronically.

Confidentiality covers both the identity of the people involved and the information shared. Victims/survivors and their families have the right to choose to whom they wish to disclose their story.

However, they must be informed from the outset of the possible limits of confidentiality, particularly where there is a legal obligation to report, and of the possible consequences for the proper conduct of an investigation.

Any disclosure of information should only be made with their informed consent, specifying what will be disclosed, to whom and for what purpose. No information should be released without the prior consent of the individual or, in the case of a child, the child's legal representative.

Reports must be accurately recorded, kept in a secure place and accessible only to authorised persons. The transmission of information, whether verbal or electronic, must at all times comply with strict data protection protocols.

In the event of an allegation involving another organisation, the Programme Manager will determine the procedure to be followed with that organisation in accordance with local laws.

4.6 Contracts with partners

Before entering into a partnership with an organisation, HI carries out a series of checks on its ethics and capacity, particularly in the area of safeguarding. The purpose of this assessment is to determine the extent to which the organisation's policies and practices ensure the protection of beneficiaries in a manner appropriate to their disability, gender and age, and to the nature of the activities planned. The results of this assessment are shared with the organisation and, where appropriate, joint action is taken to prevent any abuse that may be committed by its staff or members in the context of the future partnership.

HI's partnership agreements specify that partners agree to comply with this Institutional Policy, as well as those relating to child protection, anti-fraud and anti-corruption, anti-discrimination and disability, gender and age inclusion. Recommendations to members and staff are set out in the HI Code of Conduct, which is brought to their attention. Any serious breach of this policy may be grounds for termination of the partnership.

If the allegation concerns a member of another organisation, the [Regional] Programme Director or Country Manager will decide how to deal with the organisation concerned and may consider referring the matter to a third party, in accordance with local law.

5 Monitoring and assessment

The monitoring and evaluation of the implementation of the safeguarding policies (*PSEAH, Child Protection and Fraud & Corruption Policy*) is linked to the organisation's principle of transparency regarding our activities and our desire to monitor and demonstrate to our internal and external stakeholders our progress and continuous efforts to improve safeguarding practices.

These principles are firstly ensured through the effective translation of our policies into the organisation's Code of Conduct and through an implementation plan defined in the organisation's Global Protection Framework, which also includes the allocation of institutional responsibilities. This three-pillar plan (culture, people and governance) is accompanied by a set of policies, guidelines and tools for all employees of the organisation.

These policies are monitored by internal control processes that enable us to measure and report on changes in our practices over time.

An annual monitoring of 27 mandatory indicators, to be completed by all the organisation's offices and programmes, has been introduced, allowing us both to check that our actions are in line with our protection standards and to analyse the investments and resources that the organisation's key decision-makers are devoting to prevention and remediation daily.

Finally, the organisation ensures that this transparency is respected by committing to inform the relevant regulatory bodies and donors (depending on the contractual agreements signed) of any incidents of sexual harassment, abuse or exploitation that the organisation may encounter



Child Safeguarding Policy

This paper presents HI's approach to child protection. It provides a policy framework and defines prevention and response mechanisms.

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