

# Education for Sustainable Development (ESD) Child Protection and Safeguarding Policy

ESD recognises the rights of all children within our care to be protected from harm in accordance with the United Nations Convention on the Rights of the Child (CRC). ESD takes seriously its duty of care. It undertakes to create an organisation that is safe for children where all efforts are made to prevent abuse. ESD sees the best interests of the child as paramount. (ESD Policy Statement)

### Document Description

Clients	Board, ESD HO Staff, ESD programme coordination and field staff, Implementing Partners
Title	ESD Child Protection Policy
Document Type	Policy
Owned by	ESD Board
Reviewed & Approved by	ESD Board

### DEFINITION & ACRONYMS

- A. Child or Children:** Anyone under 18 years of age.
- B. Child Abuse:** Anything which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood.

The main categories of Child Abuse are Physical Abuse, Emotional Abuse, Neglect/Negligent Treatment, Sexual Exploitation & Abuse and Exploitation.

- Physical Abuse:** Non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury or suffering to a child. Physical force includes but is not limited to hitting, shaking, kicking, pinching, pushing/pulling, grabbing, burning, female genital mutilation, torture, and other physical acts. Physical injury or suffering may include but is not limited to bruises, marks, soft tissue swelling, hematomas, fractures, sprains, dislocation, burns, damage to organs, death, permanent disfigurement, and any other nontrivial injury.
- Emotional Abuse:** Harm to a child's emotional, intellectual, mental or psychological development. This may occur as an isolated event or on an on-going basis. Emotional abuse includes but is not limited to any humiliating or degrading treatment (e.g., bad name calling, threats, yelling/screaming/cursing at, teasing, constant criticism, belittling, persistent shaming, etc.), failure to meet a child's emotional needs, and rejecting, ignoring, terrorizing, isolating or confining a child.

- **Neglect/Negligent Treatment:** The failure to meet a child's basic physical and/or psychological needs either deliberately or through negligence. Neglect includes but is not limited to failing to provide adequate food, sufficient or seasonally-appropriate clothing and/or shelter; failing to prevent harm; failing to ensure adequate supervision; failing to ensure access to appropriate medical care or treatment or providing inappropriate medical treatment (e.g., administering medication when not authorized); or failing to provide a safe physical environment (e.g., exposure to violence, unsafe programming location, unsafe sleeping practices, releasing a child to an unauthorized adult, access to weapons or harmful objects, failing to child-proof a space that children will occupy, etc.).
- **Sexual Exploitation & Abuse (SEA):** All forms of sexual violence and coercion, sexual solicitation, manipulation or trickery including incest, early and forced marriage, rape, involvement in or exposure to indecent images/video (aka pornography), sexual slavery/trafficking, and statutory rape. Sexual abuse may include but is not limited to indecent touching or exposure, explicit sexual language towards or about a child and grooming. Sexual abuse does not always involve touching. Sexual Exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes including but not limited to profiting monetarily, socially or politically from the sexual exploitation of another. Be aware that technology is a tool sometimes used to sexually exploit a child.

The sexual exploitation and abuse of children under the age of 18 is child abuse and a policy violation. It may also constitute a criminal offense, depending upon the age of consent, local laws and customs.

- **Grooming** is the process in which an adult builds a relationship with a child or the child's caretaker to gain the child's or the caretaker's trust for the purposes of sexually abusing and/or exploiting the child. Grooming typically occurs in phases, and it can happen online or face to face, by a stranger or by someone the child or caretaker knows. Since it is a gradual process, it can sometimes be difficult to detect. Here are a few indicators that an adult may be grooming a child or his/her caretaker:
  - a. Favoring the child over others
  - b. Providing the child with rewards or privileges
  - c. Isolating the child from others
  - d. Expressing interest in a child who is particularly vulnerable or in need of support (e.g., previous abuse of the child by another)
  - e. Befriending the parents or caretakers who are responsible to protect the child
  - f. Providing the child with alcohol or drugs

- g. Building intimacy (i.e., having inside jokes or telling the child that nobody understands him/her like the groomer does)
      - h. Threatening, blackmailing, intimidating, or scaring a child by saying the groomer will do something to the child's family or friends
    - **Exploitation:** The actual or attempted abuse of a position of vulnerability, power differential, or trust for the benefit of the individual leveraging their position, power, privilege, or wealth (through enticement, manipulation, coercion or trickery) to engage a child in labor, domestic servitude, forced criminality, soldiering or organ harvesting. Typically, the person(s) exploiting a child does so in order to profit monetarily, socially, or politically. It can happen to one or a group of children, in the community of origin, outside of the community, or internationally. The exploitation of a child may include but is not limited to:
      - domestic servitude (e.g., cleaning, childcare, cooking, etc.)
      - forced labor (commonly in factories or agriculture)
      - forced criminal activities such as pickpocketing, begging, transporting drugs, manufacturing drugs, selling pirated merchandise
      - used for benefit fraud □ forced to become a child soldiers or join a gang
- C. Child Data:** Paper or electronic information containing Personally Identifiable Information (PII) collected for our programmatic or operational purposes.
- D. Child Protection:** Child protection is making the world safe for children. It is our programmatic area of work aimed at protecting children from all forms of abuse and exploitation in all regions of the world. Child Protection responses are macro-level in scale and involve holistic approaches to meet the social and legal protection needs of children and their families within vulnerable communities.
- E. Child Safeguarding:** The set of policies, procedures and practices that we employ to ensure that ESD is a child safe organization. Child Safeguarding is making ESD safe for children. It involves our collective and individual responsibility and preventative actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm by ESD staff, representatives and third parties, who come into contact with children or impact them through our development interventions, humanitarian responses and operations. This includes our direct program implementation, work through partners and management of children's personal data.
- F. Child Welfare:** Child Welfare is making the community safe for children. It includes claims of child abuse that happen external to ESD and/or that are

required by law or local norms to be reported to local authorities, which may include familial, communal or institutional child abuse allegations.

- G. Guest:** Any non-employee, non-representative invited into ESD to visit programs or partake in an event or activity sponsored by ESD.
- H. Personally Identifiable Information:** Any information that can be used on its own or with other information to identify, contact, or locate a single person or to identify an individual
- I. Public Communication:** Dialogue in the public sphere in order to deliver a message to a specific audience. Speaking events, newspaper editorials, advertisements, email and Social Media are a few forms of public communication.
- J. Representative:** Employees, volunteers, interns, consultants, Board members, Partners and others who work with children on ESD's behalf, visit ESD's programs, or who have access to sensitive information about children in ESD's programs.
- K. Social Media:** Forms of electronic communication/content used to share information, comments, messages, images, video and other content via a Social Network

## 1. INTRODUCTION AND POLICY

Education for Sustainable Development (ESD) is an Ethiopian Residents Charity, which is a woman-headed organization established in November 2007. It has been registered by the Federal Democratic Republic of Ethiopia Charities and Societies Agency in accordance with the CSO proclamation No. 621/2009 bearing the registration number 0259. It is a non-profit, non-religious and non-political development organization. ESD's supreme body is the general assembly which is composed of 11 members and the 5 members Board of Directors which assumes the next higher organizational hierarchy. Next to the board of directors, the management team of ESD is the next managerial body which executes the day-to-day routines of the organization.

ESD works on the following four thematic areas or programs: 1) Education, 2) Livelihood Enhancement, 3) Entrepreneurial Development and 4) Environmental Conservation. Under these four programs, there are 12 projects being implemented targeting & benefiting over 25,000 marginalized people of whom 60% are women and girls. Since its establishment, ESD has reached/touched 25,000 people investing a total amount of 25,000,000 ETB. The aforementioned programs are implemented in 16 weredas of three regions (Amhara, Oromiya and Southern Nations, Nationalities and People

### 1.1 POLICY STATEMENT:

***ESD recognises the rights of all children within our care to be protected from harm in accordance with the United Nations Convention on the Rights of the Child (CRC). ESD takes seriously its duty of care. It undertakes to create an organisation that is safe for children where all efforts are made to prevent abuse. ESD sees the best interests of the child as paramount.***

---

#### **We will do this by:**

1. Preventing abuse where possible by setting in place and implementing systems and procedures to protect children through best recruitment practices, staff induction and training, creating an open and aware culture, assigning clear management responsibilities and involving children appropriately in their own protection.
2. In the event of disclosure or discovery of abuse; setting in place clear guidelines and procedures for reporting and reacting, dealing promptly and properly with incidents, supporting victims and holding perpetrators to account.

All staff will be bound by the policy. Children with whom ESD works either directly or through partners will be involved appropriately in the implementation and monitoring of implementation of the policy. All visitors to ESD projects will be expected to uphold the policy. All partner organisations will, over time, be expected to comply with minimum standards defined by the policy.

Managing this policy lies with ESD's management and the Line programme coordination Managers in ESD and each programme coordination office has the responsibility of implementing the policy in full through appointing a designated Child Protection Officer (CPO) or Child Protection Focal Person (CPFP)<sup>1</sup> in their intervention office of operation who will be the key contact in any disclosure or suspicion of abuse and will be responsible for the training and induction of staff in child protection issues.

## 1.2 Key Principles for Safeguarding Children and Adults

This policy recognises and builds on the legal and statutory definitions of a child

- The distinction between ages of consent, civil and criminal liability are recognised but in the pursuit of best practice in the delivery and management of sporting activities and events across ESD, a child is recognized as being under the age of 18 years (Children Act 1989 definition)
- The child's welfare is paramount
- All children, whatever their age, culture, any disability they may have, gender, language, racial origin, religious belief and sexual identity have the right to protection from abuse and poor practice
- All incidents of suspicious or poor practice and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- All children have a right to engage in sporting activity in ESD in an enjoyable and safe environment
- Young people have a right to expect appropriate management, support, personal and social development with regard to their involvement in sport, whether they are playing, officiating or volunteering.
- It is the responsibility of the statutory authorities to determine whether or not abuse has taken place but it is everyone's responsibility to report any concerns.
- Confidentiality should be upheld in line with the Data Protection Act 1999 and the Human Rights Act 1998.

Working in partnership with children, their parents and other agencies is essential for the protection of children.

## 1.3 Who is Responsible for Safeguarding Children

It is the responsibility of every adult and young person working in sport and physical activity to ensure every engagement with children is to the highest professional standard, no matter what organisation or whether on a paid or voluntary basis.

This safeguarding policy has been created to assist and guide safeguarding policy and procedure implementation and development across ESD's sphere of influence in its role as a strategic body for different developmental projects and implementations.

## 1.4 Safeguarding Values

- Empowerment - Presumption of person led decisions and informed consent by the individual or their parent/guardian.
- Protection - Support and representation for those in greatest need.
- Prevention - It is better to take action before harm occurs. This includes safer recruitment practices, codes of conduct, sharing best practice and appropriate training.
- Proportionality – Proportionate and least intrusive response appropriate to the risk presented.
- Partnership - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability - Accountability and transparency in delivering safeguarding

## 1.5 The Role of ESD

ESD is committed to promoting the safety and welfare of children found in the project operational areas where ESD is operational. It aims to contribute to safeguarding children by:

- Meeting the requirements of the Standards for Safeguarding and Protecting Children who are targeting by different developmental projects in the intervention area.
- Implementing and demonstrating best safeguarding practice when core staff, volunteers or others are providing services, activities and programmes for children and vulnerable adults
- Working with partners to establish and implement agreed, consistent minimum safeguarding standards in the intervention area
- Requiring those individuals or organisations that are funded to provide any service for children and vulnerable adults to effectively address safeguarding requirements
- Maximising its influence to promote safeguarding practice and principles within its wider partnership role and relationships.

## 1.6 Who does the Policy apply to

It is acknowledged that individual partners may have their own safeguarding policies and procedures. However these policies may not all meet the highest standards and reflect current legislation.

In situations where multiple policies may apply the Partnership Check and Challenge Tool will be undertaken to confirm which policy applies in which situation:

- ESD Core Team
- Volunteers recruited by ESD Core Team
- Any temporary staff or contractors working on behalf of the Core Team



- Donors and visitors of the organization

## 1.7 Working in Partnership to Safeguard Children

ESD will work with partner agencies and community groups to adopt and adhere to this policy document, where appropriate.

The partners within ESD will:

- Work with the Core Team of ESD to agree to, and formally adopt (where appropriate) the standards and procedures set out in this policy.
- Implement best working practice protocols and procedures are implemented to ensure safe environments. •
- Ensure everyone involved in any project activity for children and young people is appropriately trained and qualified to undertake the duties they are required to do, in accordance with local and national guidance.
- Be aware of safeguarding issues both in the context of organised activities and within the home and community. •
- Ensure policies and procedures are in place to report suspected or actual abuse and poor practice, and that everyone involved within ESD understands and is aware of the procedures to follow.
- Respect and promote the rights, wishes and feelings of children and young people.

The policy and procedures are mandatory for all ESD direct staff and will consist of:

- Procedures and systems to ensure a prompt response to concerns about a child's or adult's safety or welfare.
- Policies and procedures to minimise the possibility of children and adults being abused by those in a position of trust.
- Agreed confidentiality, communication and information sharing procedures.
- Appropriate recruitment, employment and deployment procedure.
- Codes of conduct to describe what an acceptable standard of behaviour is and promote good practice.
- Education and training opportunities to maintain the necessary skills and understanding to safeguard children and vulnerable adults.
- Communication arrangements to provide essential information and support to those responsible for safeguarding children and vulnerable adults.

## 1.8 Communication of the Policy

To ensure the successful implementation of this policy it is essential that ESD communicates to partners its commitment to safeguarding children and young people, and that this is openly displayed and available to all. This Policy has been agreed and formally approved by the ESD Board of Directors. Communication of the Safeguarding Policy and discussion regarding the Implementation Plan will take place with partners,

including relevant bodies such as key government stakeholders and likeminded development organizations, alliance and consortium members.

In addition, the Policy is available to all partners, customers, parents, participants and the general public at large via ESD website. This ensures people have access to this information, and are able to understand how the Policy will be implemented, and the process they should follow should an issue arise.

## 1.9 Implementation and Monitoring

ESD will review its existing Safeguarding Children and Adults Policy and procedures every 3 years or as needed, which have been produced in line with the Standards for Safeguarding and Protecting Children. The original implementation and monitoring plan was produced for the achievement of the three levels of safeguarding standards, preliminary, intermediate and advanced.

A revised implementation and monitoring plan will be produced bi-annually to ensure the continuation of safeguarding implementation throughout the partnership with the overall aim to ensure that all providers of services to children and adults within the wider partnership network and community will operate to consistent standards of best safeguarding practice.

## Section 2: Procedures and Reporting

### 2.1 Introduction

#### 2.1.1 WHAT IS CHILD ABUSE?

According to the World Health Organisation, “Child abuse” or “maltreatment” 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 the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power.’*

NSPCC similarly specify “cruelty to children” or “child abuse” as ‘behaviour that causes significant harm to a child. It also includes when someone knowingly fails to prevent serious harm to a child. All forms of cruelty are damaging – it can be harder to recover from the emotional impact than from the physical effects.’

**There are 4 categories of abuse generally defined:**

**Physical abuse:** Physical abuse is any form of non-accidental injury or injury which results from wilful or neglectful failure to protect a child. Examples include hurting or injuring a child, inflicting pain, poisoning, shaking or otherwise causing physical harm to a child.

**Sexual abuse:** Sexual abuse occurs when a child is used by another person for his or her gratification or sexual arousal, or for that of others. This includes direct or indirect sexual exploitation or corruption of children by involving them (or threatening to involve them) in inappropriate sexual activities.

**Emotional abuse:** Emotional abuse is normally to be found in the relationship between a care-giver and a child rather than a specific event or pattern of events. It occurs when a child's need for affection, approval, consistency and security are not met. Emotional abuse, for example, happens when a care-giver repeatedly rejects children, humiliates them, frightens them or denies their worth and rights as human beings.

**Neglect:** the persistent failure to meet a child's basic physical and physiological needs. Neglect can be defined in terms of an omission, where a child's health safety, development or welfare is being avoidably impaired by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults or medical care.

### WHO ABUSES?

A person may abuse a child by inflicting harm or failing to prevent harm. Children can be abused in a family, community or institutional setting. More often than not the abuser is known to and trusted by the child. Those who wish to abuse come from all sectors of society. Children also abuse other children.

A child sex-abuser, even if not working directly with children, may be attracted to working with an international NGO because the job provides him or her with access to children locally in the country of operation. The cloak of respectability provided by working for an INGO can provide greater access, increased opportunity and decreased chance of detection or prosecution.

## 3. ESD'S CHILD PROTECTION POLICY

### WHAT IS A CHILD PROTECTION POLICY?

Child protection is about protecting children from intentional and unintentional harm within organisations intended for their benefit.

As an organisation working with children, both directly or indirectly, ESD has a moral and legal responsibility and a duty to protect children within our care from both intentional and unintentional harm. ESD believes that all staff need to be aware of our policy and commitments in relation to child protection even though the majority of staff may never have unaccompanied contact with children or young people through their work. It is not possible to eliminate risk entirely, but we are obliged to develop strategies and mechanisms to reduce the risk.

### WHY DO WE NEED A CHILD PROTECTION POLICY?

ESD believes that as an NGO working for vulnerable children's rights we have an absolute duty to protect this already vulnerable group from abuse, mistreatment, and exploitation from within organisations and environments intended for their benefit. This

duty is imperative and non-negotiable. Without adequate standards and mechanisms of protection in place, an organisation is not only failing in its primary duty of care, but may also be negligently or recklessly fostering an environment of abuse.

As an organisation with a specific focus on vulnerable children it is our duty to ensure that our promotion of children's rights includes specifically protecting children from accidental harm as well as deliberate abuse within organisations intended for their benefit. This policy will assist in fulfilling this duty.

Organisations without protection policies, guidelines and systems are more vulnerable to false or malicious accusations of abuse.

Without proper policies, guidelines and procedures in place, allegations of abuse, whether founded or unfounded, can destroy an organisation's reputation. This will have serious implications for fundraising, potentially undermining an organisation's entire portfolio of work, even beyond the scope of the particular project concerned.

## **ADVANTAGES OF IMPLEMENTING A CHILD PROTECTION POLICY**

### ***Children are protected***

---

*Although no policy or guidelines can offer complete protection for children, following this policy minimises the risk to children of abuse and exploitation.*

### ***Staff and representatives are protected***

---

*By implementing this policy all staff and representatives will have clear guidance on their own behaviour around children and what to do if they are told of or notice inappropriate behaviour on the part of others.*

### ***The organisation is protected***

---

*By implementing the policy ESD is making clear its commitment to safeguard children. The policy is a tool to enable us to move towards best practice in this area and to deter those who would wish to abuse from joining the organisation.*

## **4. WHO IS BOUND BY THE POLICY?**

### **4.1 ESD STAFF**

ESD staff are bound to the commitment not only to abide by, but also to understand and promote the policies, guidelines, principles and practice of child protection in a child rights context. It is crucial that ESD staff uphold the highest standards of professional and ethical behaviour while working with ESD, because the actions of the staff members reflect the principles of the organisation. When we talk of staff we mean:

- Head Office staff
- programme coordination and field staff
- Interns/volunteers, both international & local

All Field Offices will progressively be expected to comply with ESD's child protection standards supported by head office. Each field must develop country specific guidelines on child protection based broadly on the ESD standards set out in the *Policy Procedures Guidelines: Recognizing, Reporting and Responding*, and its eight associated annexes, and ESD's *Child Protection Focal Person's Manual*, and its associated annexes..

#### **4.2 INDIVIDUALS ON PROJECT VISITS (Donors, Journalists, etc.)**

Anyone travelling either as a representative of ESD, or where ESD is responsible for that person, e.g. donors, journalists and researchers, and who will have direct or indirect contact with children during the project visit, will be:

- Expected to receive a specific briefing on arrival in country from the designated child protection person to include code of behaviour, use of information etc.
- Expected to uphold the Code of Behaviour.
- Depending on the level of contact with children expected they may be expected to sign the statement of commitment to ESD's Child Protection Policy and a personal declaration stating any criminal convictions, investigations or allegations made against them with respect to child protection issues.
- There will be no unsupervised access to children for individuals on project visits.

### **5. ESD'S CORE CHILD PROTECTION PRINCIPLES**

#### ***BEST INTERESTS OF THE CHILD***

---

The welfare of the child is the paramount consideration. Actions taken to protect a child, including assessment, should not in themselves be abusive or cause the child unnecessary distress. Every action and procedure should consider the overall needs of the child.

#### ***CHILD RIGHTS***

---

ESD's Child Protection Policy is firmly based on the principles of the UN Convention on the Rights of the Child. A child rights-based approach puts children at the centre of work intended for their benefit and involves them as actors in their own protection and development.

#### ***CHILD PARTICIPATION***

---

Children have a right to be heard, listened to and taken seriously. Taking account of their age and understanding, they should be consulted and involved in all matters and decisions which may affect their lives. Children have much to contribute through a clear understanding of their own situations and ways in which they can be supported to protect themselves.

Creating spaces where children feel able and willing to speak out about abuse, free from abusers, empowers them to become involved in their own protection without

further discrimination or shame. Children will only benefit from this policy if they are aware of their rights and are given the proper environment in which to exercise them.

### **THE CREATION OF A CHILD SAFE ORGANISATION**

---

ESD believes in:

- creating an environment where issues of child protection are discussed openly and are understood between children and adults,
- ensuring that there is an open atmosphere where concerns can be brought to the attention of the relevant people,
- promoting open lines of communication both internally and externally within and between organisations to improve awareness and implementation of child protection policies and practices, and
- creating a framework to deal openly, consistently and fairly with allegations concerning both direct and indirect abuse.

### **ACCOUNTABILITY**

---

ESD has identified the importance of leadership with clear lines of accountability, without ambiguity about who is responsible at every level, especially for the health, well-being and safety of vulnerable children. The criminal dimension of any action cannot be ignored.

### **TRANSPARENCY**

---

Transparency breaks down cultures of silence, taboo, secrecy and fear in which child abuse thrives. Transparency and the space and opportunity to talk freely create a preventive and protective environment for children. Transparency shows that an organisation has nothing to hide and that it is willing to admit to, and learn from mistakes. Silence breeds abuse and exploitation of children. Transparency in dealing with incidents is required, whilst maintaining the confidentiality.

### **CAPACITY BUILDING**

---

Effective child protection requires compulsory training and clarity of responsibility for personnel working with children. ESD understands the need for capacity building on issues of child protection and appreciates the constraints and conditions under which we operate. ESD is committed to undertake such capacity building.

### **COMMITMENT**

---

Child protection is not just about reading and signing a piece of paper: the policy sets out guidelines and standards that must be put into practice. Above all, it must be remembered that it is the children, not the standards, that are sacrosanct; and although abuse must never be tolerated, the standards are no more than a tool in the service of promoting the welfare of children.

## 6. Procedures for the prevention, reporting, investigating and disciplinary actions

### *Prevention*

---

**Policies:** ESD will develop, implement, and maintain strict policies that will provide structure and guidance for ESD all employees and partners.

**Recruitment:** Through a strict recruitment process, we will strive to identify potential offenders or deter them to join ESD.

**Training:** We will train employees and partners about our policies and processes, helping them to adopt adequate behaviors and identifying problematic behaviors with others. **Continuous review and update:** Policies and practices will be regularly reviewed and evaluated, and changes will be made to improve our global safeguarding policy.

### *Reporting*

---

**Internal feedback system and whistleblower:** We encourage an open-door policy, enforce a non-retaliation policy and have identified a person who is available to receive feedback and complaints (and act upon these without endangering the person(s) submitting these).

**Beneficiaries' participation:** Communities in which ESD works, will be made aware of our policies and will know their rights and how to report potential abuses and abusers to the largest extent possible. In practice this means that we will ask from our partner organizations to be transparent about complaints and safeguarding policies, via their websites or otherwise.

### *Investigation, Discipline & Sanctions*

---

All instances of suspected exploitation, abuse and harassment will be investigated, and disciplinary action will be taken when needed.

## **6.1. Prevention**

### **A. Policies**

ESD will have the following policies to protect children from any form of abuse and neglect and these policies familiarized with the all the concerned and related staff

### **Code of Conduct**

ESD's Code of Conduct is a set of guiding standards and principles that all representatives of ESD adhere to in practice and in spirit in all their decisions, procedures, actions and interactions.

All employees are required to familiarize themselves with this Code of Conduct upon joining ESD and annually thereafter. Partners are required to sign the Code prior to being contracted by us.

## ***Child Protection***

As a child focused organization, ESD will not tolerate any physical, sexual or verbal abuse against a child or youth anywhere in our work. Children and youth as used in this policy is understood to be any person under 18 years of age, or older if determined by law.

All employees are required to familiarize themselves with this Code of Conduct upon joining ESD and annually thereafter. Partners are required to sign the Code prior to being contracted by us.

## **B. Recruitment**

### ***Advertisement***

The job description and advertisement on websites and in newspaper or any other support will include a mention referring to our policies and that all employees are required to adhere to it.

### ***Interview***

Appropriate questions are asked during the interviews, to evaluate candidate's commitment to safeguarding.

### ***Reference check***

At least three reference checks will be done for any prospective employee (including volunteers and interns).

### ***Background check***

For any employee that will work directly with children, and when legally authorized in the country of assignment, a criminal background check that specifically checks for prior incidents of child-related misconduct of any kind, is conducted. For staff employed at ESD and interest to join the organization as an employee should bring a certificate that shows free from any form of abuse and violation of children from the Forensic office of Ethiopia.

## **C. Awareness Raising**

### ***Anti-harassment Meeting***

Each employee will participate in an anti-harassment team discussion that will be conducted at least once per year.



## Awareness

ESD management will ensure that all staff and others working with ESD are aware of the problem of child abuse, and the risks to children, and on (sexual) harassment in general.

### D. Continuous review and update

#### Continuous review

Every reported incident will trigger a review of the policy to determine if and which changes in our policies and practices could avoid the same situation to repeat itself.

New policies, white papers, training and recommendations from peer organizations or donors may be considered to improve the ESD's safeguarding policy.

## 6.2 . Reporting

### A. Internal feedback system and whistleblower

It is mandatory for all ESD employees to immediately report any witnessed, suspected or alleged incidents of exploitation, abuse or harassment.

There is often a deeply entrenched culture of silence around exploitation, abuse and harassment. Thus it is incumbent upon all ESD team to create reporting mechanisms that make it *easy and safe* for victims and observers to report any such misconduct.

In the ESD office clear information will be posted with instructions for how to report any witnessed, suspected or alleged misconduct (and from our partner organizations we will expect the same). This will include the email and or/phone number of relevant staff, such as the Integrity Officer(s). In addition, each program site should have a letterbox for anonymous reports.

To facilitate the reporting internal feedback, an Integrity Officer(s) is identified in ESD. The Integrity Officer(s) is tasked with the following key responsibilities:

- Contribute to the design and implementation of an updated integrity infrastructure, and systematically review/update and disseminate the code of conduct and related set of policies to all staff to ensure that is current and widely used
- Monitor and implement of ethical policies and procedures
- Provide guidance to the Management on how to conduct Integrity Risk Assessments
- Develop and conduct awareness programs on integrity and ethics to all ESD staff and relevant partners
- Ensure that reporting mechanisms are in place, both in the workplace and in communities;
- Conduct the initial fact gathering of any issues reported; and

- Inform the Director, Human Resources, or any concern, incident or information received and coordinate the approach to solve the issue.
- Organize at least 4 meetings a year with the whole team of ESD in which case studies on integrity issues are shared and discussed
- Conduct or supervise fact-finding and/or investigations and provide advice on any aftercare within a team, following an investigation
- Develop and deliver trainings to staff and management on moral judgment/integrity together with relevant colleagues, and institutionalize the practice of regular moral deliberations
- Develop and conduct annual/multi-year integrity planning, monitoring and reporting mechanisms that meet the vision and ambition of the organization
- Produce anonymous annual review on both the preventive and governing components of the compliance practice, and on moral dilemmas and the moral learning process

We encourage an open-door policy, enforce a non-retaliation policy and have identified a person who is available to receive feedback and complaints (and act upon these without endangering the person(s) submitting these).

### 3. Investigation

#### Reporting

All instances of suspected exploitation, abuse and harassment must be investigated. This includes rumors and gossip as well as formal reports. The Director is ultimately responsible for the investigation, unless there is any allegation that the Director is involved in the incident. If the Director is suspected, the HR Manager is responsible for the investigation. If the HR Manager is alleged to be involved in the incident, then the matter is referred to the Board of Directors.

Depending on the seriousness and complexity of the allegation, the investigation may be handled internally by the Integrity Officer(s) or referred to an outside expert. If the person responsible for the investigation (the Investigator) believes an outside expert is required, they will consult with the Management to determine the appropriate course of action.

#### Processes

Process for an investigation will vary from case to case. The investigations may include the following steps:

- The initial response to any allegation is to take the alleged report seriously;
- When a complaint is filled through one of the possible channels the (one of) integrity officers will decide who is best positioned to become the Investigator for the allegations.
- Upon receipt of a report the Investigator will review the allegations and take interim actions (e.g., instructing the respondent to refrain from communications

with the complainant), as appropriate. If a report is verbal, the Investigator may encourage the individual to complete the “Report Form” in writing (see Appendix). If he or she refuses, the Investigator prepares a Report Form based on the verbal reporting;

- It is key to take all reasonable precautions to ensure protection of the alleged victim; the Integrity Officer ensures that care and protection are given when needed, including but not limited to removing the alleged victim and / or perpetrator from the situation, and offering access to professional psychological support;
- The Investigator may request and review relevant documents including electronic communications and take steps to obtain and preserve those documents;
- The Investigator may interview parties involved, including relevant witnesses;
- The Investigator may create a written documentation (see Appendix for Incident Report) of the investigation (such as a letter, memo or email). And;
- When appropriate the Investigator may inform the individual who reported of the right to file a report or charge externally.

## Disciplinary Action and Sanctions

If, after an investigation, Management, in consultation with Human Resources, concludes that ESD policy was violated in any way, it will take all appropriate action.

Disciplinary action will be taken against any Employee or Partner found to:

- Have engaged in prohibited discrimination, harassment, or any other conduct that has violated ESD policies;
- Have contributed to the creation or continuation of a hostile work environment may;
- Have failed to report an exploitation, abuse or harassment concern;
- Have obstructed an internal investigation; Disciplinary action may include, but is not limited to:
  - Termination of all relations including employment, contractual or partnership agreements;
  - Reporting to authorities if it is suspected that a crime has been committed;
  - reduction in salary scale
  - re-assignment of duties
  - reduction in salary
  - deductions from salary, by way of fine
  - a reprimand

A determination that misconduct has occurred does not necessarily mean that a sanction must be imposed. A decision can be taken that other remedial action may be appropriate.

In addition to any disciplinary action taken by ESD, the employee or partner may be held personally liable for monetary damages if a civil action is filed against him or her. Sanction will be decided by the Director or the Board of Director and will be based on principles of predictability, fairness, proportionality, reducing risk, and encouraging improved performance.

## Confidentiality

ESD will maintain the confidentiality of the complainant, the accused, and any witnesses, and each of their statements and records, to the fullest extent practicable and appropriate under the circumstances. ESD cannot promise absolute confidentiality but will conduct the investigation on a need-to-know basis.

## Communication

The director must be informed of all incident, alleged or not, the result of the investigation, and what corrective action was taken, if any. In turn, she will inform the Partners in the programme country where an incident is reported. If needed, the Director will inform the donor and or beneficiaries.

ANNEX

## REPORT

**Type of Incident: Location:**  
**Date of Report: Submitted to:**

### BASIC INFORMATION

Fraud/Corruption/Sexual Exploitation/Abuse/Other Misconduct Country and specific office or program site

*If any question does not apply, say "N/A". If you do not know, say "Don't Know". Do not leave any area blank. Be specific!*

<b>INCIDENT</b>	Who (person involved / alleged perpetrator)	
	Did What	
	Where	
	How	
	When	
<b>DISCOVERY</b>	Who	If person requests whistleblower protection, say "Anonymous"
	Discovered What	
	How	
	When	
	Reported it to Whom on what Date(s)	

### ADDITIONAL INFORMATION

*Fill in any information that is currently known. This section can be updated over time.*

<b>CORRECTION</b>	Actions with Community Partners	List, by date
	Actions with ESD Staff or Volunteers	'''
	Actions to Recover Funds	'''
	Reporting to Authorities	'''
	Legal Action	'''
	Next Steps (Planned or Recommended)	
<b>LEARNING</b>	Possible Reasons Why This Happened	
	How It Went Undetected	
	What Was the Impact	
	Recommended Changes	