

## Reaching Across Borders (RAB) Child Safeguarding Policy

**Effective Date:** January 2022

**Next Review Date:** December 2025

**Current Policy Owner:** CEO and Board

For all RAB's corporate policies, please visit the website: <https://ReachingAcrossBorders.org/policies/>

### Organizational Commitment and Compliance

Reaching Across Borders (RAB) is committed to keeping children safe. To do so, we have a zero-tolerance policy for any form of abuse, exploitation, or violence. We take every measure to prevent such incidents and to ensure compliance with U.S., host-country, and international child-welfare and protection laws and standards.

RAB will investigate, act upon, and report suspected safeguarding violations in accordance with the provisions of this policy and RAB's policies for investigating ethics and fraud violations.

### Goals of Child Safeguarding Policy

RAB implements programs designed to benefit children and their families. These programs may include activities that could raise the risk of child abuse, exploitation, and neglect. It is our responsibility to protect the children we come in contact with from such harm.

RAB embraces the principles within the *UN Convention on the Rights of the Child* as its minimum standards of protection for children reached by its programs. The personal conduct of those engaged in work for RAB, either as direct staff, consultants, volunteers, or as staff of our partners, contractors, vendors, and subrecipients, will be measured against this policy.

RAB has developed this policy to comply with funders' child safeguarding requirements, including DFID standards, AIDAR 752.7037 (August 2016), and the *USAID Child Safeguarding Mandatory Standard Provision*. These standards, clauses, and provisions apply to activities that may involve children and award implementation in which personnel may come into contact with children.

### Safeguarding Principles

Ethical practices at RAB are guided by the principle that work and business relationships be conducted with the highest level of honesty, integrity, diligence, fairness, trust, and respect. RAB's safeguarding principles include:

**Equality:** We will treat all children and adults equally with respect.

**Responsibility:** We are all responsible for protecting children in our work and daily life. We will demonstrate our commitment to safeguarding in all our interactions with children.

**Accountability:** We will hold ourselves and others accountable to our safeguarding policies and code of conduct.

**Cooperation:** We will work closely with governments, funders, partner agencies, and beneficiaries to promote a safe environment for children.

**Confidentiality:** Confidentiality is fundamental to safeguarding, reporting, and investigation processes. We will maintain confidentiality during all stages of a safeguarding investigation, sharing information only on a need-to-know basis. Confidentiality breaches can have serious consequences for all involved in a safeguarding investigation and will result in disciplinary action.

**Child-centered approach:** In a child-centered approach, the child's wishes, safety, and well-being are prioritized in all matters and procedures. Investigation and response processes will ensure sensitivity and accountability, avoid re-traumatizing children, maintain focus on the child, and ensure support to survivors.

**Child awareness:** We will ensure that children understand and are aware of child safeguarding and protection processes.

**Children as participants in investigations:** We will ensure that care is taken when children are involved in an investigation and that any investigative interview with a child be undertaken within best practice protocols (e.g., child-centered, child-paced, and conducted or guided by a suitably trained practitioner).

**Responsiveness:** We will ensure that reporting and investigating processes are conducted in a timely manner.

## To whom does the Child Safeguarding Policy Apply?

RAB's Child Safeguarding Policy applies to everyone associated with RAB, including but not limited to:

- All full-time, part-time, and temporary staff
- Partner staff
- Volunteers and interns
- Consultants
- Subcontractors and sub-recipients

## Designated Child Safeguarding Focal Person

Designated child safeguarding focal persons will be identified to support the coordination and implementation of RAB's child safeguarding obligations across the organizations.

## Child Safeguarding Standards of Behavior

These standards of behavior are expected of and apply to all RAB staff and associates. Employees, partners, consultants, subcontractors, subrecipients, interns, and volunteers are expected to understand the implications of this code on their language, behavior, actions, and relationships with children.

The RAB Child Safeguarding Standards of Behavior are applicable to the treatment of children with whom RAB staff and associates come into contact. Any breach or failure to comply with them will be taken seriously by RAB and will result in disciplinary action.

The list below is not prescriptive and should be applied in the spirit of providing the highest level of protection and duty of care to children.



## **When working with children you must never:**

- Hit or otherwise physically assault, harm, or abuse children.
- Engage in sexual activity or have a sexual relationship with anyone under the age of 18 years, regardless of the age of majority/consent or custom locally. Mistaken belief in the age of a child is not a defense.
- Develop relationships with children that could be in any way considered exploitative or abusive.
- Act in any way that may be abusive or place a child at risk of abuse.
- Use language with or behave toward a child in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning, or culturally inappropriate.
- Have children with whom we are working stay overnight at your home or other personal accommodation in which you are staying.
- Condone or participate in children’s behavior that is illegal, unsafe, or abusive.
- Act in ways intended to shame, humiliate, belittle, or degrade children
- Ignore or fail to report allegations made or concerns expressed by others about children’s welfare.
- Use a computer or other electronic device to view, download, distribute, or create indecent or inappropriate images of children.
- Use children’s images or information without obtaining proper permission and consent.
- Use computers, social media, mobile phones, video, and digital cameras, or other electronic devices and mediums to exploit, harass or bully children.

## **Safe Communication**

Ensuring safe communication, including the use of social media, is critical in all areas of child safeguarding. RAB expects its staff to promote dignity and respect in all communications, and ensure that information and images of children will never be used in a way that lessens the child’s safety or dignity. Every effort should be made to ensure that confidentiality is maintained.

## **Informed consent for use of images and information**

We are committed to portraying children respectfully and appropriately. Individuals representing RAB must adhere to the organization’s guidelines when capturing, storing, displaying, and publishing children’s images. Informed consent from the relevant caregiver and informed agreement from the child in question (according to age of understanding) must be secured before using any information about the child in external communications – written, audio, or visual. Consent must be evidenced on a consent form.

## **Information and communications technology**

RAB prohibits the use of its computer systems and networks to exploit, harass, or bully children, or to access, create or distribute inappropriate images of them.

## **Recruitment**

RAB takes preventive steps to reduce the risk of engaging a person who may be unsafe or unsuitable to work with, or be in contact with, children.

RAB has developed guidelines for recruitment to ensure we hire and engage with, the safest and most suitable staff, volunteers, and partners. Such people act in the best interests of children, protect children from all forms of abuse, and share RAB’s values. Lack of child-safe recruitment and screening procedures greatly increases the risk of engaging someone who may pose an unacceptable risk of harm (physical, sexual, or emotional) to children.



By promoting child-safe recruitment and screening procedures, RAB can attract the best people to work with children, and deter those who seek to join RAB because they want to harm children.

By implementing child-safe recruitment and screening procedures, RAB aims to create and maintain a child-safe environment, to keep all children safe in the delivery of programs.

For staff who will be working directly with children as part of the scope of their project, RAB conducts additional due diligence, including special behavior-based questions during interviews; where legal, completes criminal background checks following all applicable local laws; and/or requiring a special signed disclosure that a staff member has not been charged with child abuse or exploitation offenses

## **All RAB Job Descriptions are Required to Include the Following Language**

“RAB is a child-safe organization, and the safety and wellbeing of children is a priority of our organization. We have robust recruitment procedures to ensure that all staff are suited to work with the children served by our programs.”

## **Whistleblowing**

RAB’s encourages people who become aware of wrongdoing in the organization to report their concerns immediately. All incidents are investigated fairly and confidentially. We are committed to non-retaliation against staff members who report possible or actual violation of this policy.

RAB treats malicious allegations with the utmost seriousness and takes appropriate disciplinary action.

## **Reporting**

Children rarely speak up when they feel unsafe or are being harmed, especially within organizational or institutional settings. While it is important to encourage children to speak up, RAB cannot rely on children to let RAB know if a staff member, volunteer, or consultant is harming them or makes them feel unsafe. It is not the child’s responsibility to disclose such information.

Any action to respond to or investigate a child safeguarding concern should be guided by what is in the best interest of the child and follow RAB’s standard ethics investigation process in relation to allegations.

Any suspicion or allegation of a safeguarding violation by RAB staff, partners, contractors, vendors, or subrecipients must be reported within 24 hours to the RAB Code of Conduct Helpline. The reporter should then communicate the concern to RAB’s CEO (unless that person is implicated in the allegation), then to the Board.

Recognizing the special responsibility of protecting the privacy of a child and the confidentiality of the implicated person, RAB discourages communication about the details of child safeguarding concerns via e-mail unless absolutely necessary. If e-mail is necessary, subject headings should be vague and inoffensive, and must be flagged as confidential.

## **Responding to Children’s Disclosures of Abuse**

Because child safeguarding violations involve a minor, RAB has developed the below additional guidance to ensure safety and appropriate sensitivity.

If information about child safeguarding violations is disclosed by a child, whether or not the complaint is made by the child survivor themselves, the process of reporting and managing the incident will require

additional age-appropriate steps and considerations. RAB staff or partners must keep in mind the age of the child or young person and do the following when receiving disclosures made by a child:

- Listen to and support the child.
- Reassure the child that they did the right thing.
- Assess the risk of ongoing abuse.
- Take action to provide all possible help.
- Do not promise something you can't deliver.
- Exercise caution and sensitivity in disclosing information (i.e., only to appropriate personnel).
- Contact the appropriate authorities.

## **Managing Reported Incidents**

RAB will immediately initiate an investigation of any child safeguarding concern it becomes aware of. This investigation will follow our established policies and processes for all ethics/fraud incident reports. Additionally, for child safeguarding-related incidents, investigations will adhere to the following:

1. Persons reporting the incident and persons who have witnessed inappropriate conduct will be treated respectfully. Statements made by the complainant will be kept in appropriate confidentiality. The complainant will be:
  - Interviewed to confirm all relevant facts.
  - Given the opportunity to provide relevant facts.
  - Given the opportunity to participate in the investigation by providing names/identities of other witnesses and recommending questions to be asked by investigators.
2. Information pertaining to incidents in which children's rights have been violated should be shared on a 'need to know' basis, as deemed by the CEO.
3. As with all ethics/fraud violations we investigate, reports of child abuse must be treated seriously and impartially, and appropriate confidentiality maintained. However, RAB reserves the right to disclose information to other organizations or authorities involving employees terminated on the basis of child safeguarding violations. RAB complies with funder requirements for reporting such violations.

An employee who is dismissed as a result of misconduct with a child(ren) is not eligible for rehire.

## **Safe Programming**

### **Assessment**

Every project will be reviewed to determine the level of risk to children. RAB's Child Safeguarding policy should be used as guidelines.

### **Monitoring and Review**

All projects that could potentially affect children must annually review their programs to ensure that the project scope has not changed to affect children. If, after the annual review, a project is determined to be higher risk, it must follow additional actions as described in the RAB Child Safeguarding policy.

## **Sub-recipients, Subcontractors, Sub-grantees, Consultants, and Other Agents**

RAB includes child safeguarding requirements in all contractual documents. At a minimum, RAB partners must:

- Comply with U.S., host country, and international child welfare and protection laws and standards.
- Comply with the RAB Child Safeguarding Standards of Behavior.
- Maintain procedures to prevent and punish child safeguarding violations.
- Immediately report to RAB any credible allegations of child abuse, exploitation, or neglect related to the contract.

Additionally, partners working on RAB projects or activities that involve children or that otherwise present an increased risk to children will be expected to comply with the principles and standards in our child safeguarding policy (or the partner's equivalent policy). Contractual documents will also include funder-required safeguarding clauses including, as applicable.

RAB will monitor and ensure partner compliance in a manner commensurate with the safeguarding risk posed by the activities or partner. RAB pre-award assessments will include a review of a partner's ability to comply with safeguarding requirements and the inherent risk in the project activities that they will be conducting. Monitoring of higher-risk partners and activities will include as applicable compliance in regular reporting, evaluations, and site visits and appropriate safeguarding training of partner staff.

RAB's zero-tolerance for any form of child abuse, exploitation, and neglect extends to the actions of its business partners and their employees. The consequences of a partner's safeguarding violation are explicit and include termination of the contract, along with additional action as required (e.g., referral to appropriate authorities or funder). If RAB determines that a partner or a partner employee has committed a safeguarding violation, we will take appropriate action including, but not limited to:

- Requiring the party to remove an employee or agent from a project.
- Requiring the party to terminate its relationship with any other contractor, consultant, subcontractor, or sub-recipient found to be in violation.
- Suspending payments to the party until the violation is remedied.
- Immediately terminating the party's agreement, grant, or contract.
- Excluding the party from further work and other opportunities with RAB.
- Reporting the violation to the funder and appropriate authorities.

## **Implementation**

All staff are required to sign a code of conduct that commits them to abide by RAB policies and procedures, including this policy and the standards of behavior included herein. This policy and the standards of behavior included herein. Each new employee is oriented to HR policies and procedures, including the code of conduct.

All RAB operations are subject to this policy and it will be enforced across all RAB locations and activities. RAB will take appropriate action against RAB employees found to have violated this policy, up to and including termination and referral to local authorities.



## Definitions

**Child:** A person who has not attained age 18, regardless of the age of majority under local law.

**Child safeguarding:** The responsibility of organizations to make sure their staff, operations, and programs do not harm or expose children to abuse or exploitation.

**Child abuse or maltreatment:** Any form of physical (including sexual) abuse; emotional ill-treatment; neglect or insufficient supervision; trafficking; or commercial or transactional child labor; and other exploitation resulting in actual or potential harm to the child's health, well-being, survival, development, or dignity. Abuse and maltreatment include but are not limited to any act or failure to act that results in death, serious physical or emotional harm, or that presents an imminent risk of serious harm to a child.

**Physical abuse:** Actual or potential physical harm of a child resulting from an interaction or lack of interaction that is reasonably within the control of a parent or other person in a position of responsibility, power, or trust in relation to the child.

**Sexual abuse:** The involvement of a child in sexual activities, whether or not the child is aware of what is happening or gives consent. Activities may involve physical contact, including penetrative (i.e., rape) or non-penetrative acts. They also include non-contact activities, such as involving children in looking at or the production of pornographic materials or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

**Emotional abuse or ill treatment:** Injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to: humiliation, control, isolation, withholding of information, and any other deliberate activity that makes the child feel diminished or embarrassed.

**Exploitation:** The abuse of a child that involves some form of remuneration or in which the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to the child's physical or mental health, development, education, or wellbeing.

**Neglect:** The persistent failure to meet the child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's physical or cognitive development. For example, inadequate care and supervision that leaves a child in a situation where s/he could be harmed (but only where this can be avoided).

## Our Corporate Policies

RAB's corporate policies, collectively, are listed on the organization's official website's **policy page**: <https://ReachingAcrossBorders.org/policies/> these include:

- Recruitment & Employment policy;
- Anti-Fraud, Bribery, Corruption, Money-Laundering, and Terrorism Financing policy;
- Child Safeguarding policy;
- Procurement policy;
- Prevention of Sexual Abuse and Exploitation policy;
- Grievance Procedure policy;
- Disciplinary Procedure policy;
- Conflict-of-Interest policy;
- Privacy policy;
- Code of Conduct policy; and
- Confidentiality Agreement.

All staff of RAB, including, volunteers, contractors, consultants, full-time as well as part-time and temporary employees are expected to have read and comply to these policies. This, of course, also includes the RAB management team and Board members.