



CHILD PROTECTION POLICY

Revised, October 2017

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Policy Name:	Child Protection Policy
Policy Number:	CP-P
Responsibility:	HR
Department:	HR, Admin and Finance
Approved By:	HQ
Effective Date:	01 October 2017
Officially Registered:	01 October 2017
Next Revision Date:	01 October 2020
Responsible for Revision:	HR upon request by Management and/or HQ
Procedures and Tools:	For detailed procedures and tools related to Child protection policy (refer to annex: CISP Child Protection and Safeguarding procedures and tools)
Applicability and Objectives:	<ol style="list-style-type: none"> 1. This policy provides guidance on how to keep children safe in all CISP operations 2. The objective of the policy is to define CISP's standards and approaches regarding Child protection and safeguarding. 3. This policy is applicable to all employees of CISP Kenya and CISP Somalia, representatives and partners.
<p>It is the policy of CISP Kenya and CISP Somalia to ensure that children are safe and that our operations do not cause any harm to children we work for and with. The child protection policy defines roles and responsibilities of CISP staff ¹, representatives² and partners³ in upholding child protection in all CISP operations and; standards, guidelines and procedures to be adhered to in acting upon concerns of child abuse.</p>	

¹ All full-time and part-time CISP staff, including those working for CISP on short-term contracts (e.g. consultants and researchers etc.)

² All volunteers, Board members, Patrons and Ambassadors and all donors, celebrities and other people who visit CISP programmes and may come into contact with children.

³ All staff and representatives of partner organisations or of any other individuals, groups or organisation who have a formal or contractual relationship to CISP that causes them to have contact with children that CISP works with.

1. CISP’S COMMITMENT TO PREVENT CHILD ABUSE, VIOLENCE AND SEXUAL EXPLOITATION AGAINST CHILDREN

1.1 CISP is strongly committed to ending child abuse and all forms of sexual exploitation and Abuse. CISP therefore commits itself to creating and maintaining an environment which promotes these core values and does its utmost to prevent child abuse and sexual exploitation from happening, and respond whenever it happens.

1.2 Child protection and safeguarding is mainly about prevention through establishing awareness and good practice in working with children and keeping them safe all the time, but there will inevitably be times when children are identified as being at risk or experiencing harm, and it is essential that everyone working or associated with CISP is then clear on their responsibilities to report concerns and respond effectively and appropriately in line with local child protection reporting mechanisms.

1.3 CISP believes that abuse to a child is always wrong and it is not the fault of the child⁴.

1.4 In summary, this policy stipulates the four-broad mandate of CISP to protect children in all its operations:



⁴In all rules and regulations, a ‘child’ refers to someone below 18 years of age.

2. RAISING AWARENESS OF POTENTIAL HARM/RISKS WITHIN CISP OPERATIONS

- 2.1 Everyone who works for CISP should share and support the child protection policy in all aspects of their personal and professional life. These include: full time and part time CISP staff (including consultants and researchers); representatives (interns, volunteers, talents/celebrities, contractors, board members, trustees of CISP, donors and other people who visit CISP programmes and may come into contact with children).
- 2.2 All staff and representatives of partner organizations' or of any other individuals, groups or organization who have a formal or contractual relationship with CISP that causes them to have contact with children that CISP works with. ALL these partner organizations must be made aware of this policy and sign a copy, prior to or at the time of issuing an employment contract or any engagement agreement, to show that they are aware of this policy and will act in accordance with the contents of this document and with local child protection and safeguarding procedures. Any information implicating that the applicant has a history of Child Abuse or Sexual Exploitation and Abuse is therefore a reason for excluding him or her from employment with CISP. In the same vein, any behaviour of the CISP employee that fails to safeguard children, that puts them at risk, or that harms them directly, will be taken extremely seriously by the organization and will result into formal investigations that can lead to disciplinary measures.
- 2.3 To ensure everyone in the organization is aware of what is required of him or her to prevent Child Abuse, Sexual Exploitation and Abuse from happening and understands how he or she can contribute to building a protective and positive environment, CISP will provide regular trainings and updates on Child Protection. CISP aims to empower all staff to become agents of change in the communities in which they work and live. Such training not only focuses on what is Child Abuse and Sexual Exploitation and Abuse, but also encourages staff to reflect on their own roles in prevention of and response to such incidents. In addition to such trainings, Child Protection is a theme that will reappear in job-appraisals as well.
- 2.4 Safeguarding children is not a simple exercise. In their jobs working in fields such as education, nutrition and protection, CISP staff may encounter situations of abuse that are not easy to provide a response to, and may even be at risk of becoming complicit to child abuse. Because of the complexities involved in this issue, CISP first and foremost encourages all staff to discuss these issues openly.
- 2.5 CISP strongly advises all staff to identify issues or possible issues in an early stage, and share those with the supervisors without hesitation. This will enable teams to identify the most appropriate strategies from an early stage onwards, and will protect the staff from any false impression he or she did not do all (s)he could to prevent the abuse from happening.
- 2.6 CISP management and staff must follow the CISP procedures and guidelines to raise awareness on potential harm to children within CISP operations. (*see annex Child protection and safeguarding procedures and tools – CP-PT2*)

3. PREVENTING HARM OR ABUSE FROM HAPPENING

3.1 Mainstreaming child protection must be ensured in the design of all CISP programmes. All possible child protection risks should be established at the start of projects and mitigation measures clearly defined.

3.2 Despite all the complexities involved in keeping children safe, there are certain rules that can go a long way in preventing abuse from happening. This DOs and DON'Ts as stipulated in this policy is not an exhaustive list, but does provide crucial indications about the kinds of behaviors that are required and shall not be accepted of CISP staff, representative or partner organization staff.

3.3 CISP staff, representative or partner must:

- a) Always think about how their actions affect children. The best interest of the child is the most important thing in planning all actions involving children.
- b) Identify and avoid potential situations which may lead to their own behavior being misinterpreted as abusive or harmful.
- c) Make sure their actions empower children, and keep them safe and protected.
- d) Take children seriously. Listen to their ideas, opinions and complaints.
- e) Be a good example to children.
- f) Communicate in a child-friendly manner.
- g) Report any kind of child abuse (whether physical, sexual or emotional abuse, neglect, or exploitation) or malpractice within the organization to your supervisor, or to the designated person to handle concerns
- h) Act proactively. Report concerns to their supervisor in an early stage.
- i) Express the values of the organization in their daily life just as in their professional life.
- j) Seek consent from the parents or designated caregiver in all activities with children.
- k) When writing stories, taking pictures, making videos, or otherwise portraying children, do so in a respectful manner, and make sure to get the consent from their caregivers and the children first.
- l) Keep information about children private.

3.4 CISP staff, representative or partner must never:

- a) Act in such a way it puts children at risk of harm, and never harm children themselves.
- b) Engage in any form of child abuse, whether physical, sexual or emotional abuse, neglect, or exploitation.
- c) Favour one child over the other. All children are equally important.
- d) Treat children as if they are inferior to them; don't shame or humiliate them.
- e) Shout, use bad language, or other forms of emotional abuse.
- f) Make promises they cannot keep or meet.
- g) Have sexual intercourse, or engage in any sexual activity, seductive behaviour (grooming) such as inappropriate touching, flirting, sweet talking, with anyone under the age of 18 years old, regardless of the age of consent locally or nationally. Mistaken belief in the age of the child is not a defense.
- h) Have child/children with whom they are working to stay overnight at their home unsupervised unless exceptional circumstances apply, and previous permission has been obtained from their line manager
- i) Sleep in the same bed as a child with whom they are working.

- j) Abuse their positions to get or to give favours, such as money, employment, goods or sexual favours.
- k) Put pressure on children to do something they don't want to do.
- l) Avoid being alone with a child, travelling alone with him or her, or taking him or her to your home. If you must do this, for example to protect a child, discuss with your supervisor first.
- m) Limit their physical contact with children, such as giving hugs.
- n) Discipline any child by failing to provide the necessities of care such as food, shelter or medical attention.
- o) Discipline a child with whom they are working by use of physical punishment.

3.5 For detailed information of the procedures and tools for preventing harm or abuse from happening, *refer to annex Child protection and safeguarding procedures and tools – CP-pt3*).

4. REPORTING CHILD PROTECTION CONCERNS

4.1 CISP must appoint child protection and safeguarding focal points with well-defined terms of references. The focal points must be well communicated and known to all staff and representatives.

4.2 The priority of any staff member to whom child protection concerns are reported must be the immediate safety and welfare of the child.

4.3 All staff, representatives and staff of partner agencies have a duty to report concerns, including both specific reports and unconfirmed concerns, regarding child abuse or sexual exploitation in line with their Local Procedures.

4.4 Other representatives and staff of partner agencies must report all concerns including both specific reports and unconfirmed concerns regarding child abuse or sexual exploitation where the alleged perpetrator is a member of staff, other representative or staff of a partner agency.

4.5 If an employee raises a legitimate concern made in good faith about suspected abuse by another staff or any CISP representative, that proves to be unfounded, no action will be taken against that employee. However, any employee making false and malicious accusations of child abuse will face disciplinary action.

4.6 Child Safeguarding concerns should be reported within 24 hours, unless it is impossible or impracticable to do so or other exceptional circumstances exist. A standard template should be filled providing details about the case/allegation.

4.7 Whistle blowing and victim protection:

4.7.1 CISP also embraces a whistle blowing and victim protection approach as a way of encouraging staff, representatives, partners and the community to report Child protection concern/s. If you cannot raise your safeguarding children concern through the management line, or you have tried, and this hasn't worked, you should use the Whistleblowing procedures. This means you can raise the matter confidentially outside the management line.

4.7.2 As CISP, we will do our utmost to protect anyone filing a complaint in good faith from any negative repercussions in which such a complaint could result. CISP recognizes that to create an environment which encourages staff to come forward with concerns, suspicions, and reports of misconduct, people need to be assured that doing so shall not have any negative repercussions on their work or their private lives. We therefore stand for a commitment to protect whistle blowers, whether those are people reporting an event that has harmed them directly ('victims'), or an event that has directly harmed others or the organization ('whistle blowers').

4.8 The principle of confidentiality is therefore at the core of all steps we take in the process from allegation, to complaint, investigation and outcome, as well as afterwards. We realize there can be serious risks facing the victim and other whistle blowers involved with reporting abuse, which persist and may increase even after the organization has made a final decision regarding any potential disciplinary measures. Confidentiality is therefore not only a must throughout the procedure, but even after a decision has been made.

4.9 In the case of victims reporting an abuse, there is not only a need to safeguard confidentiality, but also to care for the needs of the victim. It is important that he or she feels supported from the beginning on, and feels valued for the courage that reporting takes. Often, victims will suffer from guilt feelings and doubts, especially when the reporting seems to lead to serious consequences. The victim therefore needs repeated reassurance that reporting was the right thing to do, and needs to be followed up regarding his or her emotional well-being.

4.10 Knowing about a child protection concern and failure to report will be interpreted as a breach of the policy and staff or representative will face disciplinary action if established beyond doubt that he/she was aware of the concern.

4.11 Standard reporting and referral procedures must be established and adhered to by all CISP staff, representatives and partners to ensure appropriate response to child protection concerns.

4.12 Staff, representatives, partners, communities including children in all CISP operations must be made aware of the child protection policy and the reporting procedures for any allegations of child abuse involving CISP staff, representatives or partners.

4.13 The Local Procedures should also include procedures to enable staff to report and respond to serious allegations of abuse and sexual exploitation where the alleged perpetrators lie outside the organization, its representatives or partners. The procedures must be easily accessible, known to and understood by all staff, representatives and staff of partner agencies.

4.14 Procedures and tools for reporting a child protection concern

For detailed information of the guidelines, procedures and tools for reporting a concern – (see *annex Child protection and safeguarding procedures and tools – CP-pt4*)

5. RESPONDING APPROPRIATELY TO A CHILD PROTECTION CONCERN

- 5.1 Responding to a child concern entails acting in the best interest of the child immediately, while launching an investigation process for the allegations. The welfare of children is of paramount importance.
- 5.2 All information regarding a concern or assessment must be shared on a 'need to know basis' in the interests of the child. Ethical and statutory codes concerned with confidentiality are not intended to limit exchange of information between professional staff. It must be understood that information gathered for one purpose cannot be used for another without consulting with the person that provided the information.
- 5.3 The issue of confidentiality in handling child protection concern is part of the training for CISP staff, representatives and partners, and must be upheld always.
- 5.4 If concern is a criminal case CISP staff or focal point reporting or receiving the concern must ensure the child is safe and refer to national authorities – police, Children's Officer and other relevant statutory institutions.
- 5.5 If concern is noncriminal and involves CISP staff or its partners, actions/investigation should be undertaken by CISP focal points and the management.

Please remember these key action points:

- Act quickly and get help
- Where possible, ensure that the child is safe
- Record all the facts and keep them confidential between you and those who need to know
- Report it immediately to the Child Safeguarding Focal Point and or your Line Manager
- Do not investigate any child safeguarding case reported to you

- 5.6 A clear investigation procedure must be established, and an investigation committee formed to investigate concerns reported to the child safeguarding focal points.
- 5.7 CISP management must develop clear TORs be shared to person/s mandated to investigate an allegation of child abuse or exploitation, and all required support accorded
- 5.8 An investigation report should be prepared using a CISP standard template and submitted to the investigation committee for decision.
- 5.9 For detailed information of the procedures and tools for responding to a concern – (see *annex Child protection and safeguarding procedures and tools – CP-pt5*)

6. AUDIT AND REVIEW OF IMPLEMENTATION OF THE POLICY

- 6.1 An audit across CISP Kenya and Somalia operations will be undertaken annually by the management or designated person to monitor the level of implementation of the policy.
- 6.2 Each program/ Country will be required to monitor the policy and develop implementation action plans and budgets aiming at full implementation within agreed

timescales. It will be the responsibility of the senior management to support the implementation, monitoring and review of the policy.

6.3 Children and care givers must be consulted as part of the review process.

6.4 A child safeguarding audit tool for use by CISP should be developed to monitor the level of implementation of the policy.

6.5 Lessons learnt in the general implementation of this Policy as well as from individual incidents should be used to influence policy and develop best practice across CISP and elsewhere when appropriate.

7. OTHER RELEVANT DOCUMENTS IN SUPPORT OF THIS POLICY

- a) CISP staff Code of Conduct – HR Policy and Procedures – Chapter 2
- b) HR Policy and Procedures – Chapter 3