



AIDOS

CHILD SAFEGUARDING POLICY

(Rev. 17th of September 2020)

CHILD SAFEGUARDING POLICY

Contents

<i>Acronyms</i>	3
<i>Introduction</i>	3
<i>Definitions</i>	4
<i>Purpose of the Child Safeguarding Policy (CSP)</i>	5
<i>Guiding principles</i>	5
Child at the Centre	5
Child Leadership and Participation	5
Empowerment.....	5
Prevention	5
Reporting.....	5
Response	6
<i>Child Safeguarding Standards</i>	6
Appropriate Boundaries	7
Appropriate Child Behaviour Management	9
Appropriate Physical contact with children	9
Appropriate Logistics' Arrangements	10
Preventing Sexual Misconduct.....	10
Breaches of the Policy for Interacting with Children	11
<i>Annex 1 - AIDOS Child Safeguarding Policy Reporting Procedures</i>	11

Acronyms

- CSP** - Child Safeguarding Policy
- DLP** - Designated Liaison Person
- HQ** - Headquarter
- EC** - European Commission
- ECHR** - The European Convention on Human Rights
- EU** - European Union
- UN** - United Nations
- UNCRC** - UN Convention on the Rights of the Child

Introduction

The Associazione Italiana Donne per lo Sviluppo Onlus – AIDOS (Italian Association for Women in Development - AIDOS) implements project' activities in direct contact with children and minors. This Child Safeguarding Policy only applies within AIDOS' projects targeting children and minors.

AIDOS acknowledges considerations on the vulnerability and safeguarding of children and is, therefore, committed to ensuring that all necessary steps and actions are taken at all levels, to safeguard the wellbeing, health and dignity of children participating to projects, activities and programs of the organization.

This Child Safeguarding Policy (CSP) outlines AIDOS' commitment to:

- 1) protect children from harm, including abuse, neglect, exploitation and violence;
- 2) set clear responsibilities and procedures for AIDOS staff, volunteers, collaborators, associates and representatives (hereinafter referred as "AIDOS human resources") in direct contact with children within the actions implemented by the organization;
- 3) report to the relevant authorities and/or to services/organizations specialized in children's protection/children abuse case management any concerns/complaints raised/received about children's safety within AIDOS projects addressed to children and minors.

The policy was developed taking into account international and European child protection policies:

- Universal Declaration of Human Rights
- The European Convention on Human Rights (ECHR)
- EU Charter of Fundamental Rights
- Article 3(3) of the Treaty of the European Union
- UN Convention on the Rights of the Child (UNCRC)
- EC Communication: EU Agenda for the Rights of the Child
- The Italian legislation

Definitions

Child - AIDOS adopts the definition of the UN Convention on the Rights of the Child whereby “a child means every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier”¹.

Child abuse and neglect - sometimes also referred to as child maltreatment, is defined as 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. Within the broad definition of child maltreatment, five subtypes are distinguished – these are physical abuse; sexual abuse; neglect and negligent treatment; emotional abuse and exploitation².

Best interest of the child - is one of the four overarching principles of the UN Convention on the Rights of the Child, which derives from Article 3, according to which “in all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration”. Assessing the best interests of a child means to evaluate and balance “all the elements necessary to make a decision in a specific situation for a specific individual child or group of children”.

Child safeguarding - Child safeguarding is the responsibility that organizations working or in contact with/impacting on children lives have to make sure their staff and collaborators (e.g. consultants, associates, service providers) operations, and programmes do no harm to children. That entails that they have in place institutional/internal policies and procedures intended to not expose children to the risk of harm and abuse, and to report to the appropriate entities any concerns about children’s safety within the communities in which they work.

Child Protection – Child protection is part of safeguarding and refers to activities undertaken to protect children who are being or are at risk of being abused.

¹ Article 1, <http://www.ohchr.org/Documents/ProfessionalInterest/crc.pdf>

² http://www.who.int/topics/child_abuse/en/

Purpose of the Child Safeguarding Policy (CSP)

AIDOS, by defining the CSP, pursue the following objectives:

To safeguard children by minimizing risks of harm to children throughout all types of implementing activities of AIDOS and its collaborators.

To protect all actors contributing to actions implemented by AIDOS by setting clear guidelines about how they are expected to behave with children and how to act in case of concerns regarding the safety of a child.

To protect the reputation and credibility of AIDOS by clarifying its commitment, practices and standards to keeping children safe.

Guiding principles

The following guiding principles inform the spirit and implementation of the CSP.

Child at the Centre

According to the UNCRC, the child's right to have its best interests as a primary consideration needs to be respected and recognized by everyone. In other words, the child must be at the centre of everyone's care and concern taking into consideration a gender approach. The well-being, safety and security of children are paramount, and are a pre-requisite for their progression and development. Children must be valued, listened to and respected as rights-holders.

Child Leadership and Participation

Child leadership and participation are a must when it comes to sustainably and effectively respond to children needs with regard to issues related to women's and girls' human rights and gender equality, since children are directly affected by those issues and should be part of the solution. Child leadership and participation in the design, policy and practice of gender related projects will help ensure that these are relevant, responsive and effective.

Empowerment

A prerequisite for children to fully participate and lead is that they are empowered. Two key elements of empowerment for participation are support for the development of skills and provision of a safe and enabling environment conducive to participation. Empowerment relates also to supporting children to be able to protect themselves to the extent possible thanks to knowledge of their rights and of support networks.

Prevention

Ensuring that children are protected from harm by AIDOS human resources through safe recruitment, safe programming and safe communication practices, and by promoting an environment where all AIDOS human resources work to minimize the risks which might lead to cause harm to children.

Reporting

Ensuring that reporting mechanisms for the referral of child protection concerns are in place and accessible, and that all AIDOS human resources have clear what procedures to follow where concerns arise regarding a child protection incident.

Response

Ensuring that appropriate measures are taken to protect and support children where concerns arise regarding a child protection incident, and that commensurate actions are taken where suspicions regarding a child protection incident are validated.

Child Safeguarding Standards

Standard on Policy: AIDOS Child Safeguarding Policy is meant to be adopted and applied by the board and staff members, and by all its human resources and it is promoted and distributed widely, making it available on AIDOS website and translating it into Italian, French and Arabic.

Standard on People: AIDOS defines clear responsibilities and expectations on all actors directly involved in the implementation of its actions and support them to understand and act in line with these.

- The Administrator is designated to have the lead responsibility for the development, review and implementation of the guiding principles and child safeguarding procedures.
- AIDOS board has the responsibility for overseeing the implementation of the policy.
- The President is the Designated Liaison Person (DLP) having the lead responsibility for ensuring that organizational reporting procedures and measures to be taken are followed correctly and promptly and acts as a liaison person with the board, the “focal points” and with the relevant authorities, where required.
- The Vice-President is the Deputy Designated Liaison Person and acts on behalf of the DLP in the event that the DLP is not available (e.g. due to annual leave, sick leave, etc.).
- Key staff (Programme Officers/Project Managers) are designated at central and regional/country levels as “focal points” with clearly defined roles and responsibilities to guarantee that any child abuse/child protection concern is treated and investigated keeping the highest degree of confidence and to make sure that all human resources involved in the projects understand the designated persons’ responsibilities and have their contacts.
- Any concern about the conduct of AIDOS human resources, as well as partner organizations’ human resources, shall be investigated. In case of concerns related to the DLP, these shall be addressed to the Deputy Designated Liaison Person or directly to the Board for further actions. Investigation may result in disciplinary action for AIDOS human resources and in the immediate termination of the Partnership Agreement in case of partner organizations’ human resources.
- All the staff, volunteers and collaborators in direct contact with children will be made aware of the policy and will receive support or training as needed.
- Should AIDOS engage new staff, consultants or other profiles who will be in direct contact with children or have access to children’s information, appropriate checks will be done: recruitment will be confirmed upon checking references (including those from previous employers or other people having knowledge of the candidate’s suitability to work with children) and/or criminal records where necessary. Respect of the policy will be included in contracts and guidelines on a code of conduct will be provided.
- As rights holders with non-negotiable rights to protection, children are made aware of their right to be safe from abuse and provided with support and advice on keeping themselves safe including information about where to seek for help.

Standard on Procedures: AIDOS creates a child safe project environment by implementing consistently the safeguarding measures defined in the present policy.

- Local mapping exercises will be carried out in order to have a better understanding of legal, social welfare and child protection arrangements and create a strong network to refer any possible complaints to relevant authorities (i.e. Social Services) and/or services/organizations specialized in children's protection/children abuse case management.
- Child safeguarding risk assessments and mitigation strategies will be incorporated into existing processes and systems at all levels.
- AIDOS human resources will be provided with clear procedures for reporting any child abuse/child protection/safeguarding concerns, including violations of this Policy, that may arise while implementing activities related to AIDOS' programs. Response to reports of abuse and/or protection concerns should be consistent with local laws and should take into consideration whether the harm/abuse is committed by AIDOS human resources or within the community where the project is implemented. Where consortium or partnership agreements are in place, the same guidelines shall be followed to report the incident. Reporting can be made in person (at all levels in the organization) and to any AIDOS offices (HQ and field offices); a form developed in a format and language that is child and age appropriate and that will be translated into local languages on a needs' basis (Annex 1) will be made available for incidents/complaints and will be used by anyone who wishes to report confidentially and looks for information on how to submit a complaint. In case of incidents/complaints arising within the communities and not linked to its human resources, AIDOS will refer the case to the network of relevant authorities and services/organizations specialized in children's protection that have been mapped at local level. Staff, volunteers and collaborators in direct contact with children will be trained on an appropriate process for reporting and responding to child protection incidents and concerns.

Standard on Accountability: AIDOS monitors and reviews the safeguarding measures and uses lessons learned to make necessary adjustments.

- The monitoring of compliance with the CSP is integrated into the internal organizational/programme monitoring process.
- Basic risk assessments at project level/based on the project needs will be carried out to monitor the changing protection environment and be aware of emerging threats and risks to the safety of children.
- The policy will be revised and formally evaluated at least once every three years by the Administrator in collaboration with the programme's officers and projects partners also based on concrete evidence.
- Any relevant amendments shall be made to the policy at any time to ensure that it complies with any new developments in policy standards and national/international legislation related to safeguarding of children within the activities undertaken by AIDOS.

Child Safeguarding Measures - Interacting with Children

Note: We use the term "AIDOS human resources" to indicate staff, volunteer, associates, consultants and other profiles who will interact with children in the context of AIDOS projects.

Appropriate Boundaries

It is expected that AIDOS human resources will be caring adults who take an interest in the children and who set appropriate boundaries within their interaction with children.

AIDOS human resources must always treat children with respect. There is no place for sarcasm, derogatory remarks, offensive comments or any other inappropriate conduct that may result in emotional distress or psychological harm to a child.

Some indicative behaviours that may cause psychological harm to a child includes:

- targeted and sustained criticism, belittling or teasing;
- excessive or unreasonable demands;
- hostility, verbal abuse, rejection or “scape-goating”;
- any form of harassment of children (including those with disabilities);
- using language that discriminates based on ethnicity, nationality, sexual orientation, gender identity, religion, socio-economic situation, gender, etc.;
- using social isolation as punishment.

AIDOS human resources must always treat children in a consistent manner without inappropriate familiarity or spending ‘special time’ with a child. Some indicative behaviours that may suggest a child is not being treated in a consistent manner could include:

- giving gifts to a child (when this is not the practice with other children);
- showing special favours;
- allowing a child to over-step rules.

AIDOS human resources must be conscious that their position places extra obligations on them and this requires them to model and encourage behaviours that minimize the risk of harm to children. To prevent the risk of harm to children, AIDOS human resources should exercise discretion and caution and not engage with children in social activities that are not part of the intended activity/programme.

In situations where there are relationships between AIDOS human resources and children’s families, AIDOS human resources should be conscious of the difference between professional and personal relationships and ensure appropriate professional conduct and boundaries are maintained at all times.

Some examples of when AIDOS human resources are to ensure professional boundaries are maintained include:

- visiting children at their home;
- inviting children to visit their home;
- making telephone calls of a personal nature to children;
- giving children AIDOS human resources’ home phone number;
- sending emails, sms (text) of a personal nature to children;
- communication of a personal nature using social networking sites.

AIDOS human resources must avoid, as far as reasonably possible, situations where they are alone with a child. The nature of the work may require an AIDOS human resource to be alone with a child (e.g. for counselling). If this happens, AIDOS human resource should exercise caution. Some examples when an AIDOS human resource should exercise this caution include:

- Transporting a child in their car. AIDOS human resources should not drive a child in their car unless

they have specific permission or in the event of an emergency. AIDOS human resources should attempt to obtain parental consent/"legal guardian" or permission.

- When counselling or interviewing children, ensure the setting is an appropriate protection space. For example, in rooms there might be glass windows and doors will not be locked.
- Supervision of chores: ensure at least two children are involved in chores and activities rather than individual children.

For special or extended activities, a minimum of two AIDOS human resources will supervise children. The gender should be appropriate to the composition of the children groups.

Appropriate Child Behaviour Management

Child behaviour management practices aim to facilitate the development and experience of responsible self-discipline amongst children and to promote the wellbeing and safety of children.

AIDOS human resources should be aware that the following behaviour management practices are unacceptable:

- any form of corporal punishment;
- using an object to gain a child's attention in a hostile or an inappropriate physical manner;
- holding or restraining a child for any purpose other than a child's actions causing imminent harm to self or others;
- hitting, kicking, pushing, pulling, shoving, grabbing, pinching, poking, shaking or throwing a child;
- intimidating, swearing at or using sarcasm to humiliate a child;
- locking a child in a confined space and/or applying painful or noxious conditions;
- refusing biological necessities as a means of punishment;
- criticizing a child rather than the child's actions;
- practices which instill fear or using fear or practices which cause a child to feel alienated as a means of controlling a child;
- exposing a child to material that contains adult concepts or themes that are inappropriate to the child's age.

Appropriate Physical contact with children

When physical contact with a child is a necessary part of the activity, AIDOS human resources must exercise caution to ensure that the contact is appropriate and acceptable for the duty to be performed. AIDOS human resources are required to develop and exercise prudent judgment and sensitivity regarding appropriate physical interactions with children.

Examples of situations in which physical contact with a child may be appropriate include:

- assessing a child who is injured or ill may necessitate touching. An AIDOS human resource should advise the child of what they intend to do and, where possible, seek the child's consent;
- certain activities may require the physical handling of a child to demonstrate a particular action or skill;
- comforting a distressed child;
- guiding a child in a non-threatening manner;
- gently tapping a child on the shoulder to gain his/her attention after verbal requests were unsuccessful;
- protecting a child from imminent danger to himself/herself or to others.

Physical interventions (including physical restraints, removals or escorts) to contain and/or control the

behaviour of children should only be employed as measures of last resort to ensure safety and protection. The use of physical intervention is restricted to occasions when the child, other children, AIDOS human resources or others are being harmed or are in imminent danger of being harmed. Only such force as is reasonably necessary in the circumstance is permitted.

Some examples of when it may be appropriate to use physical intervention as a last resort include:

- a child attacking an AIDOS human resource;
- a child attacking another child;
- children physically fighting;
- child causing, or at risk of causing, injury to self or others;
- a child misusing dangerous materials, substances or objects where it is likely that this will cause imminent harm.

All AIDOS human resources using physical interventions are responsible and accountable for the manner in which they exercise that authority and these interventions should be documented.

Appropriate Logistics' Arrangements

Activities of AIDOS will occasionally imply local and/or international travel. It is paramount to ensure that arrangements related to travel take care of the safety of children participating:

- Activities will be organized taking into account school-related requirements and calendars.
- A parent/legal guardian will accompany the child who is under-aged for travelling alone to long-distance intra-national or international destinations.
- Travel and pick-ups will be arranged for children under-aged travelling to short-distance intra-national destinations.
- Internal local transport (e.g. from activity venue to hotel) will be supervised by an AIDOS human resource.
- Social activities outside the programme will be organized in group and supervised by an AIDOS human resource.

Preventing Sexual Misconduct

AIDOS human resources must not, under any circumstances, engage in intimate and/or sexual relationships with a child or engage in any conduct or communication of a sexual nature with a child. The age of the child or of AIDOS human resource involved is irrelevant. It is also irrelevant whether the relationship is heterosexual or homosexual, consensual or non-consensual or condoned by parents or caregivers. Such circumstances may also result in criminal charges.

Sexual misconduct includes:

- obscene language of a sexual nature, suggestive remarks, jokes of a sexual nature or obscene gestures;
- unwarranted and inappropriate touching;
- sexual exhibitionism or undressing in front of children;
- personal correspondence with children in respect of the AIDOS human resource's sexual feelings for the child;
- deliberate exposure of children to sexual behaviour of others, other than in the case of prescribed curriculum materials in which sexual themes are contextual;

- possession, distribution or display of pornography;
- electronic transmission of messages or files which are sexually explicit, offensive or contain inappropriate jokes;
- sending sms (text) messages or communicating using social networking sites material which is sexually explicit, offensive or contains inappropriate jokes.

AIDOS human resources must be cautious of the content and context of their discussions and interactions with children. AIDOS human resources must exercise caution when:

- making personal comments about a child;
- asking questions that probe a child's sexuality or personal relationships;
- discussing with children personal details of the AIDOS human resource's or child's lifestyle;
- disclosing their personal contact details to children.

AIDOS human resources must not:

- discuss with a child matters of a sexual nature relating to themselves or any other person unless a child reports an abuse or risk of abuse;
- supply or serve alcohol, tobacco or illicit drugs to a child;
- supply or administer medication without the express permission of a parent or guardian.

Should any child engage, or attempt to engage, in inappropriate behaviour of a sexual nature with an AIDOS human resource, then immediate steps must be taken to discourage the child (such as referring her/him to partners' organizations and/or other services/organizations specialized in children's protection/children abuse case management) and the matter should be immediately reported according to AIDOS reporting procedures.

Breaches of the Policy for Interacting with Children

Conduct which is contrary to this Code will be dealt with in accordance with relevant policies and laws and in accordance with principles of fairness and natural justice.

Should any AIDOS human resource have concerns about possible breaches of this Code, they should speak with AIDOS board or staff who have the responsibility for overseeing the implementation of the policy. Notification of any possible contraventions is essential given the duty of safeguard owed to children. In addition, all AIDOS human resources are to notify any allegation of child harm of which they become aware.

Annex 1 - AIDOS Child Safeguarding Policy Reporting Procedures

AIDOS

Child Safeguarding Policy Reporting Procedures

Contents

Acronyms	1
Introduction.....	1
Determining whether you need to make a report	2
Reporting procedures	2
Reporting Follow up.....	5
Confidentiality and data protection.....	6
Annex 1: Complaint/Incident reporting Form.....	7
Annex 2: Oath of Confidentiality for Investigators.....	9

Acronyms

CP - Child Protection
CSP - Child Safeguarding Policy
DLP - Designated Liaison Person
HQ - Headquarter
FP - Focal Point
GBV - Gender-Based Violence
NGO - Non-Governmental Organization
SOP - Standard Operating Procedure

Introduction

AIDOS recognizes that children are, by nature, vulnerable to harm and this is particularly the case in humanitarian contexts. It is therefore essential that all AIDOS human resources and partners, as well as target children and communities, understand that:

- Child harm may be committed by AIDOS human resources, partners or other AIDOS associates;
- Child harm may be committed by authorities or leaders;
- Child harm may occur within families, communities, institutions or other care arrangements;
- Children and young people may also be perpetrators of harm against other children.

AIDOS will provide support to any child involved in its projects in order to ensure them protection from further harm in bounds of the mandate, capacity and ability of the Organization to do so.

Identified and/or suspected cases of child abuse need to be referred immediately to external child protection (CP) specialized services/relevant authorities as indicated in AIDOS Child Safeguarding Policy (CSP), ensuring that child protection guiding principles are adhered to, including the best interests of the child and informed consent. Information is to be shared only on a need-to-know basis with the service provider, and the safety of the child and others involved paramount.

Determining whether you need to make a report

Concerns and reports may be received from a number of sources – including AIDOS human resources, partners' staff, volunteers, children and families/community members. All concerns and reports must be taken seriously. However, unless abuse has been proved to occur, it is recommended to refer to “alleged incident”.

When there is a complaint, concern or suspicion of harm perpetrated against a child who benefits from AIDOS programs or a child who is not directly involved in AIDOS activities, this needs to be handled in accordance with the procedures illustrated below.

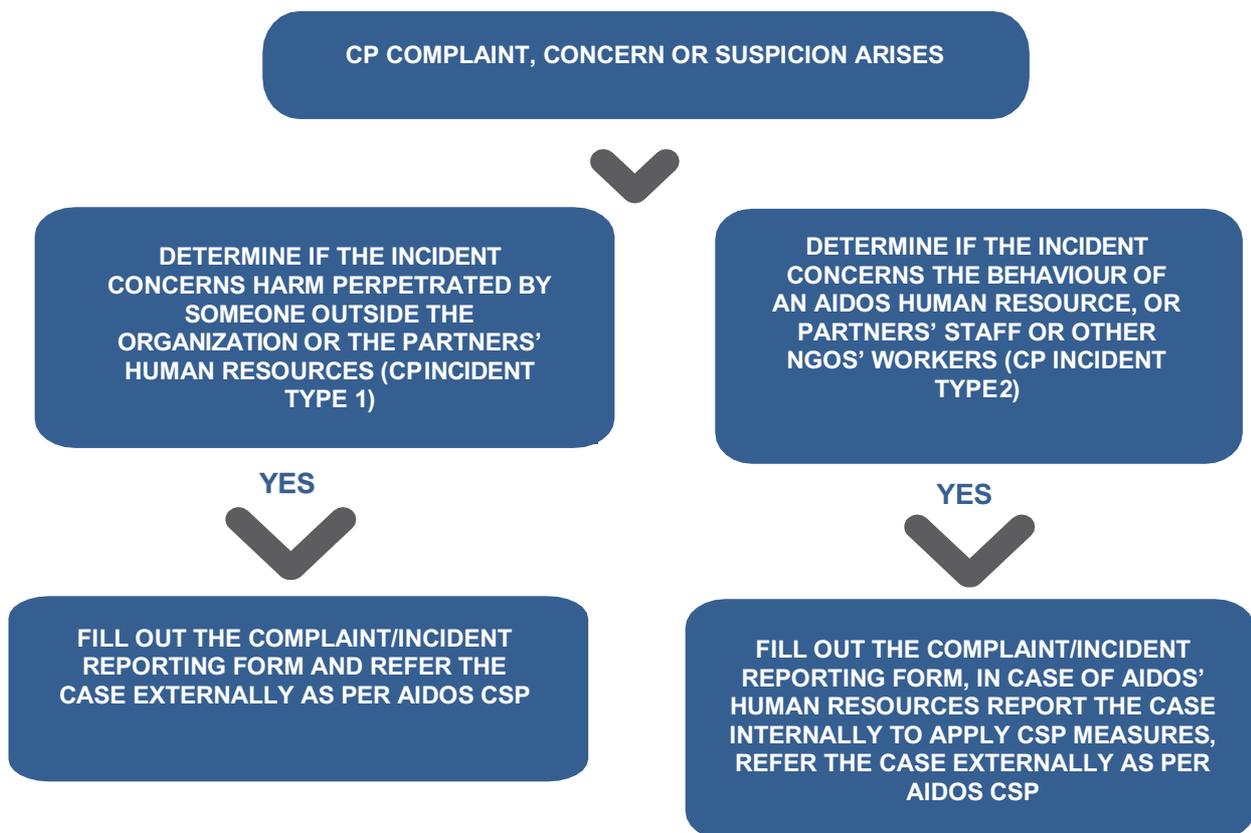
CP Incidents are of two types:

- Type 1: Any child protection incident that is not committed by an AIDOS human resource (staff member, board, volunteer, intern, consultant, contractor, etc.), donor, sponsor, partner or other AIDOS affiliate.
- Type 2: Any violation of the Child Safeguarding Policy and related standard of behaviour which is committed by an AIDOS human resource (staff member, board, volunteer, intern, consultant, contractor, etc.), donor, sponsor, partner or other AIDOS affiliate. Harm, which is committed by another humanitarian aid worker, is also considered a CP Incident Type 2.

Reporting procedures

When alleged acts of child harm involve AIDOS human resources, partner's staff or other NGOs' workers (or a representative of a humanitarian aid stakeholder such as a donor or a UN Agency):

- The complaint or incident suspicion/concern must be reported to the CP Focal Point (FP) within 24 hours from when the suspicion/concern arises. The CP FP will work with AIDOS CSP concerned human resources (Designated Liaison Person - DLP, Vice-President, Administrator and the Country Representative, where in place), to determine the necessary appropriate action.
- A Complaint/Incident Reporting Form (Annex 1) should be filled in as soon as possible and submitted to the CP FP.



Referral of CP Cases for Assistance:

Adequate mechanisms need to be established in order to guarantee that a child abuse referral is provided with timely and appropriate access to comprehensive CP assistance and care. Each CP FP will be responsible to ensure that CP referral pathways and related Standard Operating Procedures (SOPs) are operational and regularly updated in each country office/base where the project is implemented, as follows:

- Map CP case management services provided by different agencies, organizations or structures at the local level and update them regularly.
- Apply SOPs for case referral that each agency, organization and structure that AIDOS will refer cases to already has.
- Ensure that agencies, organizations and structures that AIDOS refers cases to, act according to child protection guiding principles. In line with the “Do No Harm” principle, where there are serious concerns related to meeting standards of care and relevant guiding principles, AIDOS should seek an alternative service solution based.

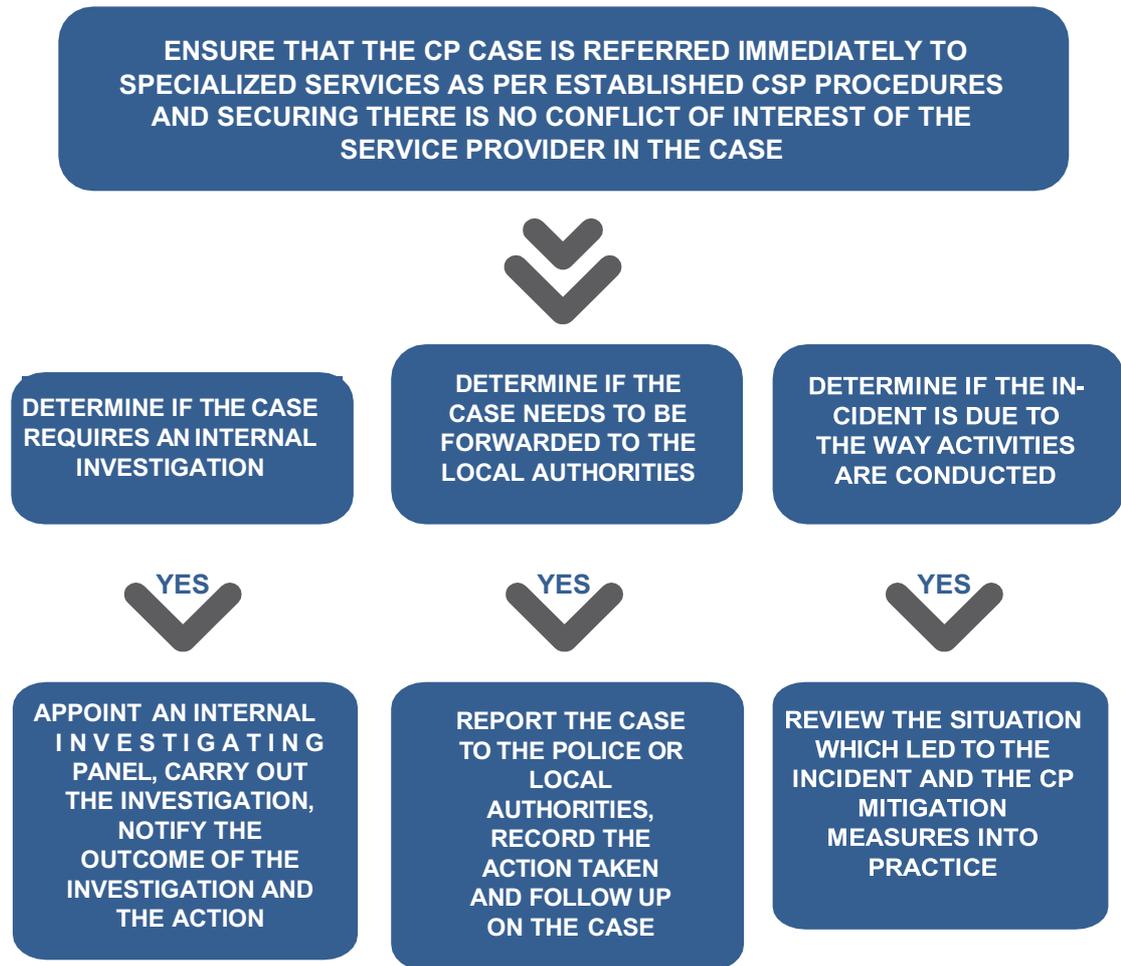
Pertinent staffs need to be trained on safe and ethical referral, as well as the established referral pathways and related agencies’ SOPs.

When CP incidents involve AIDOS human resources, partners’ staff or associates, considering that AIDOS may know the alleged perpetrator, referral to a third-party service provider is recommended even if one of AIDOS partners provide directly GBV/CP case management services.

Where possible, the CP FP will be responsible to follow-up on the referred case together with the external specialized case management team, keeping the DLP up to date.

Investigation into CP Incidents:

When a case of CP is determined as alleged CP Incident Type 2, this needs to be handled in accordance with the procedures illustrated in the flowchart below.



- The CP FP will inform the DLP within 24 hours from when the incident is reported.
- The human resource(s) involved will be immediately suspended on full pay and cease contact with children until all investigations are completed. In the event of an allegation that involves a criminal offence, the subject of the complaint will be informed that, in addition to disciplinary action, the case may be forwarded to the appropriate local authorities for further investigation.
- An initial clarification will be conducted by the CP FP, the area Programme Officer and the DLP (the Board will allocate an independent investigator where one of these is implicated) who will record all information, investigate the facts and assess the condition of the child (or children) within 48 hours, where possible.
- If the outcome of the initial clarification requires a full investigation, a panel composed by three members of the Board will be convened to carry out the investigation and determine whether the case is to be forwarded to the local authorities. The members of the investigating panel will commit to strict confidentiality (see Annex 2: Oath of Confidentiality for Investigators), information will be limited to those involved in the investigation and documentation will be filed securely as per data protection protocols.
- The investigating panel will report to the Board. All members of the Board who will be reviewing the case will also commit to strict confidentiality by signing the Oath of Confidentiality for

Investigators.

- If the incident involves a personnel member of an AIDOS partner, then the DLP will raise the issue with the relevant person within the partner organization that must report back on how they are investigating and following up the case. It will be the responsibility of the AIDOS CP FP and area Programme Officer to monitor this.
- If the incident involves another NGO's worker outside AIDOS and AIDOS partners, then the DLP will raise the issue with the relevant person within the entity the alleged perpetrator works for.
- If any AIDOS human resource or associate is found to have violated the CSP, the Code of Conduct and related standards of behaviour, immediate action will be taken. This may include:
 - » Staff – disciplinary action, up to and including dismissal. International staff will be repatriated to their country of origin and police reports may be filed.
 - » Volunteers, community committee members and interns – termination of the collaboration with AIDOS.
 - » Consultants – termination of the collaboration contract with AIDOS.
 - » Partners – if the child protection concern is mishandled, withdrawal of funding/support and termination of the partnership agreement or sub-agreement with AIDOS.
 - » Contractors – termination of the contractual agreement with AIDOS.
 - » Visitors – suspension of the visit and repatriation to their country of origin.
- For all categories of AIDOS human resources and associates, the case may be forwarded to the police or local authorities for prosecution where possible criminal acts have been committed. Where the local authorities are not functional or reporting is against the best interests of the child (especially given safety concerns), a locally available solution based on child protection guiding principle should be determined with community involvement or utilizing alternative interim care option.
- The outcome of the investigation and the action taken will be recorded and stored as per data protection protocols.
- All parties concerned will be notified of AIDOS processes, the outcome of the investigation and the action taken in a timely manner.
- The media will be exclusively dealt with by the AIDOS Communication Unit at HQ, guided in their response at all times by the AIDOS Board.
- A review of the CP risks identified and the CP mitigation measures designed will be conducted, and new action set to further minimize the risks of harm to children by AIDOS human resources and partners. This process needs to be conducted and documented within 2 weeks of the end of the investigation.
- A final report about the investigation and the action taken will be submitted to the Board.

Reporting Follow up

Reporting may result in disciplinary action for AIDOS human resources and in the immediate termination of the Partnership Agreement in case of AIDOS and partner organizations' human resources involved in the incident.

Depending upon the specific circumstances of the alleged child abuse or concern, the reporting person might be contacted by the services/organizations specialized in children's protection/children abuse case management to whom the incident has been referred for additional

information. AIDOS will make any effort to monitor the case referred, however it is also possible that the reporting person will not be informed of the results of the child abuse/concern investigation that was initiated in response to the report.

Confidentiality and data protection

Confidentiality of information is extremely important when working with children and needs to be addressed with the utmost care. It is essential that all AIDOS human resources and associates understand the importance of this principle and ensure that the data protection and sharing protocols outlined below are adhered to. Any breach of the data protection and sharing protocols may be subject to disciplinary action, up to and including dismissal.

It is essential to maintain confidentiality and therefore sharing of information, which could identify a child or an alleged perpetrator. However, confidentiality should not be promised to the persons reporting the abuse as this cannot be guaranteed (there may be requirements to report to relevant authorities according to the local Laws).

When children disclose personal information to AIDOS human resources, it is essential that AIDOS human resources understand that this information may be sensitive and ensure that such information is shared only on a need-to-know basis and in the best interests of the child.

Information related to CP incidents involving AIDOS human resources or partners, or other NGO's workers, are particularly sensitive and will be shared only with the DLP or his/her Deputy who will take over the case and inform immediately the Board to discuss the way forward.

All materials pertaining to complaints and reports about alleged acts of child harm involving AIDOS human resources, partners' and/or other NGOs' workers, will be handled in strict confidence in order to protect the rights of all involved.

Each AIDOS Country Representative will be responsible to develop a data protection system for recording, storing and sharing data related to children, and protect information, at the base and country level.

The following protocols need to be observed when handling data related to children (including case files, photos and other personal details):

- Data will not be shared with any unauthorized person and will never reveal the identity or identifying features of children.
- For the purposes of case referral meetings, information about an individual child may be discussed but identifying information (including the name of the child) will NOT be disclosed to other agencies, organizations or government bodies.
- Where data needs to be shared for a specific purpose, authorization must be sought from the Project Manager in charge before such information is shared. Data should only be shared on a need-to-know basis and in the best interest of the child.

Annex 1: Complaint/Incident reporting Form

If you have seen an actual incident and/or suspect and have cause for concern regarding an incident of child abuse, please fill out the form below where appropriate, identifying in the form whether it is an actual incident or an alleged/suspected incident.

<p>Country of Operation: Referral case number:</p>	
<p>About You: Your Name: _____ Your Job Title: _____ Workplace: _____ Your relationship to the child: _____ Your relationship to AIDOS: _____ Line Manager/Supervisor (in case of AIDOS human resources filling the form): _____ Contact details: _____ Signature: _____</p>	
<p>About the child: Name: _____ Gender: _____ Age: _____ Nationality: _____ Village/Town: _____ Municipality/District: _____ Governorate/Region: _____ Country: _____ Contact details: _____</p>	<p>Parent/Legal Guardian/Caregiver Details (if available) Name: _____ Gender: _____ Age: _____ Nationality: _____ Relationship with the child: _____ Village/Town: _____ Municipality/District: _____ Governorate/Region: _____ Country: _____ Contact details: _____</p>
<p>How did you know about the incident?</p> <p><input type="checkbox"/> Direct observation <input type="checkbox"/> Suspicion <input type="checkbox"/> Disclosure of child <input type="checkbox"/> Disclosure of other person (Name) <input type="checkbox"/> Other (specify)</p>	
<p>Incident Details:</p> <p>Is any AIDOS human resources, AIDOS partner's staff or any other humanitarian aid worker involved in the incident as perpetrator (CP Incident, Type 2) or witness? If yes, please provide details.</p> <p>Date of the (alleged) incident: _____ Time of the (alleged) incident: _____ Location of the (alleged) incident: _____ Description of the (alleged) incident:</p> <p>Was there any other person involved in the alleged incident, including witnesses? If yes, please provide details.</p>	

Your Personal Observations on the child (Any physical injuries, emotional state or other observations, if applicable):

Alleged Perpetrator Details:

Name: _____

Sex: _____ Age: _____ Nationality: _____

Relationship with AIDOS (if applicable): _____

Position: _____

Details of AIDOS Focal Point receiving the form:

Name: _____

Position: _____

Line Manager/Supervisor: _____

Contact Details: _____

Signature: _____

Date: _____

Action Taken:

Read by Delegated Liaison Person

Signature: **Date:**

Follow up (if applicable):

DLP Signature: **Date:**

Annex 2: Oath of Confidentiality for Investigators

I, the undersigned, hereby commit myself to exercise the utmost discretion with regard to my involvement in the investigation being conducted by AIDOS. I will hold secret all information known to me by reason of my activities on behalf of the investigating panel. I will not use such information for private gain, or to favor or prejudice any third party.

I understand that this declaration will remain in force after the completion of my assignment with the investigating panel. I also understand that divulging confidential information to persons who are not authorized to receive it may amount to misconduct, and that the signed original of this declaration will be held in the relevant investigation file.

Signature:

Name:

Position:

Role:

Place:

Date:

To be filled out by an investigator before whom the oath of confidentiality is taken:

Referral case number/Country of Operation:

Signature:

Name:

Position:

Role:

Place:

Date: