



Child Safeguarding Policy

Policy Number: 320

Effective Date: June 2020

Next Review Date: May 2022

Policy Owner: Chief Ethics and Compliance Officer

This policy supersedes all previous policies related to safeguarding of children.

Purpose

Pact believes that the welfare of the child is paramount. This policy seeks to ensure that all children are safe when involved in programs that are operated directly or indirectly (through subrecipients) by Pact. We are committed to preventing any harm to children and responding promptly and appropriately to any allegations of maltreatment.

Applicability

This policy applies to all global employees, consultants, independent contractors, agents and volunteers (“Workers”), and visitors (“Visitors”) who work on or visit Pact and Pact subrecipient programs involving children.

General Guidelines

Prohibitive Behaviors

Prohibited behaviors when interacting with a child include, but are not limited to:

- Physically punishing or disciplining children.
- Engaging in sexual activity with children regardless of the age of consent locally, or the perceived age of the child.
- Doing things for children of an intimate nature that they can do for themselves.
- Inviting children into their home, unless the worker’s supervisor has agreed that it is necessary for the protection of the child.
- Sleeping in the same bed or room as a child. If it is necessary to sleep in the same room, ensure that another adult is present, and that a supervisor’s permission has been obtained.
- Developing relationships with children that could in any way be deemed inappropriate, exploitative or abusive.
- Providing money to children as a gift or exchange personal contact information with a child.
- Acting in ways intended to intentionally or unintentionally shame, humiliate or degrade children, or otherwise emotionally abuse them.
- Discriminating against or show differential treatment meant to exclude children.
- Using language or behavior around or toward children that is inappropriate, abusive or sexually provocative.
- Hiring children for domestic or other labor that violates national labor laws, is inappropriate given their age or developmental stage, or places them at significant risk of injury.

- Using any computers, mobile phones, video cameras, social media or other technology to harass children.
- Accessing child sexual abuse imagery through any medium.

Social Media and Photography Guidelines

All internal and external communications regarding children must adhere to these guidelines:

- Ensure that images taken of children (e.g., photographs, videos) are accurate and respect children's privacy and dignity, following Pact's guidelines for ethical communications, found on page 6 of Pact's [Brand Standards Manual](#). Children must be adequately clothed in images. Sexually suggestive poses are prohibited.
- Before taking photographs, obtain verbal consent from children and informed consent from their caregivers using [Pact's Photo Release Form](#). Children and caregivers should be informed of how the images will be used.
- Restrict the use of images of children to professional, respectful, awareness-raising, fundraising, publicity and programmatic purposes.
- Ensure that any image or recorded case history of a child does not place them at additional risk or vulnerability to any form of abuse.
- Respect the confidentiality of all data concerning children. Abide by data protection laws and only share children's personal information on a need-to-know basis while protecting their right to privacy.

Mandatory Reporting

Workers and visitors are required to report suspicions or allegations of child abuse or exploitation, or noncompliance with this policy, within the first 24 hours by alerting the Chief Ethics and Compliance Officer or by submitting a report to the [EthicsPoint Reporting System](#). Pact workers and visitors should also report any historic allegations that are relevant to safekeeping children in all Pact programs. Guidelines for both reporting and investigating suspicions or allegations of child abuse or exploitation are outlined in the [Pact Child Safeguarding Reporting and Investigative Guidelines](#).

Please note that [EthicsPoint](#) is not an emergency service and should be used only after the child (or children) is removed from immediate harm. If a child is in imminent danger, a worker should immediately notify the relevant Country Director (CD), if possible, so that they can contact emergency law enforcement authorities or other appropriate local authorities. Only then should the worker report the alleged incident to the Chief Ethics and Compliance Officer or by filing a report through [EthicsPoint](#).

Implementation

Program Design

Pact workers responsible for designing, pricing, funding and implementing programs, directly or indirectly through subrecipients, are responsible for protecting children involved in those programs. Pact program and business development personnel are responsible for integrating Pact's Child Safeguarding Compliance Plan, summarized in the [Child Safeguarding Checklist](#), into all program and subrecipient proposals. The Child Safeguarding Compliance Plan is comprised of the following documents:

- [Child Safeguarding Checklist](#)
- [Child Safeguarding Behavioral Protocols / Social Media and Photography Guidelines](#)
- [Child Safeguarding Reporting and Investigative Guidelines](#)

- [Child Safeguarding Behavioral Protocols Template for Subrecipients](#) (French, Spanish, Swahili)
- [Child Safeguarding Subrecipient Compliance Letter and Form](#) (English, French, Spanish, Swahili)
- [Behavioral Protocols Posters for Country Offices](#) (17 languages available)
- [Social Media and Photography Guidelines Posters for Country Offices](#) (17 languages available)

Country Offices

Country Directors (CD) must ensure that all aspects of the Child Safeguarding Plan are implemented at their office and in country programs. CDs may delegate responsibilities, as appropriate, to members of their team, a Chief of Party, or other responsible senior manager, but the CD holds final responsibility to ensure children are safe to Pact's specified standards.

All Pact offices are required to display the Pact Child Safeguarding posters (displaying both the [Pact Behavioral Protocols](#) and the [Social Media and Photography Guidelines](#)) prominently for all workers and visitors to easily view.

The CD is responsible for identifying all emergency resources in their country for reporting suspected child safeguarding violations. These emergency resources should be contacted immediately if a child(ren) is at risk. [Pact's Reporting and Investigative Guidelines](#) dictate that a report should be filed with Pact's [EthicsPoint Reporting System](#) within the first 24 hours.

Recruitment and Screening

Human Resource personnel are responsible for ensuring that during any interview process, applicants for positions involving interactions with children are asked about previous work with children and secure at least two (2) references for prior work experience with children. Where permissible by local law, applicants will be requested to give written permission for a criminal record or police background check for any conviction related to sexual or child abuse. Pact will not knowingly hire anyone it learns has a prior history of sexual and/or child abuse and will terminate employment upon learning of any such history.

Human Resource personnel will ensure that all Pact staff will acknowledge receipt and understanding of Pact's Child Safeguarding Policy and Compliance Plan upon hire. All employees are required to complete the web-based Child Safeguarding Training course. Staff who work directly with children are required to retake and recertify the training annually.

Investigations and Monitoring

The Office of Ethics & Compliance is responsible for ensuring that allegations of child abuse or exploitation are investigated in accordance with the [Child Safeguarding Reporting and Investigative Guidelines](#). Throughout the investigation, Pact workers and visitors are required to participate in and cooperate with the investigation. Unless otherwise required, all information must be kept confidential regarding the suspected victim(s) and suspected perpetrator(s).

Pact's Chief Ethics and Compliance Officer and their investigators are responsible for conducting investigations of Child Safeguarding reports. The Chief Ethics and Compliance Officer must report aggregated incident data to the Pact Senior Management Team (SMT) and to the Board of Directors on a quarterly basis. The Chief Ethics and Compliance Officer shall immediately report all exceptional cases to the SMT and Board of Directors as needed.

The Ethics & Compliance Office also is responsible for monitoring that the Child Safeguarding Compliance Policy and Compliance Plan are being followed.

Enforcement

Violations of the Child Safeguarding Policy and Compliance Plan are grounds for discipline including dismissal from employment or termination of contract. An alleged perpetrator of child maltreatment may be suspended from their position (with pay) during an investigation of the allegation. A staff member who is proven to have committed child maltreatment will be dismissed from their employment with Pact and ineligible for rehire. In the event an allegation is proven to be untrue or fabricated, appropriate steps will be taken for follow-up with the person who has been accused, the child, and the person who made the accusation. Any staff member who makes false and malicious accusations will face disciplinary action, up to and including termination.