



---

# CNCF Global Child Protection Policy and Procedures

---

## Safeguarding Children and Young People

**British Registered Charity 1007484**  
**INGO License Registration No. 68/CNV-VPDA issued by Ministry of Foreign Affairs**  
**Vietnam INGO License Registration No. 1036025 issued by Ministry of Foreign**  
**Affairs Mongolia**

Lead: Child Protection Assurance Committee (CPAC)
Filename/File path:
Review Date: 1 <sup>st</sup> May 2024
Effective Date: 15 <sup>th</sup> May 2024
Next Review Date: September 2025

## Contents

APPLICATION.....	0
MISSION .....	0
CHILD PROTECTION AND SAFEGUARDING.....	0
CHILDREN .....	0
YOUNG PEOPLE .....	1
PURPOSE .....	1
APPLICABLE REQUIREMENTS .....	2
SANCTIONS.....	3
ROLES AND RESPONSIBILITIES .....	3
TERMS AND DEFINITIONS .....	5
REPORTING AND INVESTIGATION PROCESS .....	8
CHILD AND YOUNG PEOPLE PROTECTION RESPONSIBILITIES AND DELEGATIONS.....	10
ANNEX 1: SAFEGUARDING AND CODES OF CONDUCT .....	11
ANNEX 2: GUIDELINES FOR IMPLEMENTING SAFEGUARDING IN PRACTICE .....	11
ANNEX 1: SAFEGUARDING AND CODES OF CONDUCT .....	12
ANNEX 2: GUIDELINES FOR IMPLEMENTING SAFEGUARDING IN PRACTICE .....	16
Contact details for reporting concerns on Child Protection and Safeguarding. ....	18

## APPLICATION

As a Global Policy, this policy applies to:

- a. Christina Noble Children's Foundation International ("CNCFI"), including its headquarters in the United Kingdom and all of its country offices, regional offices, liaison offices, and any other offices operating under the name of the Christina Noble Children's Foundation.
- b. All National Organisations that have signed a Members' Agreement and License Agreement with CNCFI; and
- c. All other entities that agree to be bound by the Global Policies.

(together, "CNCF International Entities", or may be referred to as "we" or "us" in this document).

All of the CNCF International Entities shall enact their own procedures which must be in line with global procedures, regulations, or other regulatory documents that enable compliance by its employees, volunteers, interns, Directors (and/or, when applicable, contractors and other partners) with this Global Policy. Where required by law or local practices, CNCF offices and Organisations may enhance the standards and requirements set out in this policy.

## MISSION

The Christina Noble Children's Foundation is dedicated to serving the physical, medical, educational and emotional needs of vulnerable children. We believe that every child deserves love, respect, and freedom from all forms of exploitation. We establish long-term relationships with the children we support and empower them to live happy, emotionally rich, and independent lives.

## CHILD PROTECTION AND SAFEGUARDING

is the protection of all children from violence, exploitation, abuse and neglect Article 19 of the [UN Convention on the Rights of the Child](#) provides for the protection of children in and out of the home. In addition The [World Health Organization](#) (WHO) defines child abuse and child maltreatment 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.

## CHILDREN

Violence against all children is not only against the values and principles we uphold as described in this Global Policy, but also in direct opposition to the aims of our work. As such, we are concerned with ensuring that children do not experience harm, abuse, exploitation, or any other form of violence as a result of their engagement with us or our programmes, projects, events, and processes. Furthermore, we need to ensure that our safeguarding approach and response to safeguarding concerns are gender responsive. This Global Policy, has also included additional focus on girls as they may be especially vulnerable and at risk from certain forms of violence, including sexual and gender-based violence. Overwhelming the majority of reported incidents identify girls as the victims.

## YOUNG PEOPLE

We work with Young People 18 to 24 years old, and therefore the protective scope of this Global policy extends to young people we are supporting or are in contact with, through our youth engagement work. We recognise that young people have particular safeguarding needs requiring distinct consideration. For example, some young people engaging with and attending events supported by a CNCF International Entity may be over the formal age of majority and so face fewer legal restrictions in what is permissible, but still require protection from violence and we retain a duty of care towards them.

## PURPOSE

CNCF International recognises that violence against children and young people is prevalent throughout the world and in all societies. Violence against children includes physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment and sexual abuse. Furthermore, children and young people may be vulnerable and at risk due to, for example, reasons of gender, sexual orientation, ethnic origin, disability and age or illness. CNCF International is fully committed to ending violence against children and acknowledge that we have a duty to promote the gender responsive safeguarding of children and young people and particularly those with whom we work or are in contact.

The purpose of this policy is to ensure that:

- all who work for and engage with us are skilled, confident, understand, and are well supported in meeting their responsibilities to safeguard children and young people from violence and engage positively with them in ways that enhance the achievement of our Purpose;
- we have in place procedures to prevent and deal with the actions/behaviour of our Staff, Associates, Visitors or us as an organisation that result in violence against a child or young person and/or places them at risk of the same; and
- children and young people we work with are aware of our responsibilities to prevent and respond to any harm against them arising from actions and behaviours of our Staff, Associates and Visitors, and, the routes for reporting such incidents.

## CNCF INTERNATIONAL POLICY STATEMENT

We are fully committed to the gender responsive safeguarding of all children and young people from all forms of violence. We take very seriously our responsibility and duty to ensure that we, as an organisation, and anyone who represents us does not in any way harm, abuse or commit any other act of violence against children and young people or place them at risk of the same. We promote child and youth safe practices, approaches, interventions and environments which respects, recognises and responds to the specific safeguarding needs and addresses the protection risks of the differing gender and other identities. CNCF is non-religious, non-political. We will challenge and do not tolerate inequality, discrimination or exclusion. We respond to a child or young person who may be in need of protection and or psycho-social support and intend that their welfare and best interests will at all times be paramount consideration. We ensure all who work with and engage with us understand and are supported in their meeting safeguarding roles and responsibilities. We take positive action to prevent anyone who might be a risk to children and young people from becoming involved with us and take stringent measures against any Staff, Associate or Visitor who perpetrates an act of violence against a child. We promote the active involvement of children and young people in their own protection.

### APPLICABLE REQUIREMENTS

**This Global Policy is underpinned by the following set of principles that guides its implementation:**

1. All children aged under 18 years have equal rights to protection from all forms of violence as declared in Article 19 of the United Nations Convention on the Rights of the Child. In addition, the and equal rights of people at any age, thus including young people aged 18 to 24 years old Universal Declaration of Human Rights recognises fundamental human rights, the dignity, worth.
2. The human rights of children and young people will be respected and applied to all irrespective of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, any history of conflict with the law or any other aspect of their background or identity. Inequality, exclusion, and discrimination will be challenged and will not be tolerated.
3. All children and young people should be empowered and encouraged to fulfil their potential. Decisions made about children and young people will be made as far as possible with their participation and in their best interest giving full consideration to how such decisions will affect them. Children will be encouraged to express their views this will be given 'due weight' in accordance with their age and level of maturity.
4. We have a responsibility to care for and protect children and young people, especially those that are vulnerable, and make sure they are not harmed.
5. We have particular responsibilities to children and young people with whom we come into contact. No child or young person must suffer harm, intentionally or unintentionally, as a result of their engagement, association or contact with us whether as a sponsored child, a participant in our programmes, projects, events, processes, or youth advisory panels or as part of a fundraising or influencing campaign.

6. We have a responsibility to inform and empower children and young people so that they learn about and are better able to exercise their rights to protection. We will work with children and young people ensuring they understand the essence of this policy, our safeguarding commitment and the means via which they can report policy breaches. We will also involve them in the development of safeguarding measures within CNCF International in accordance with their evolving capacities.

7. We are open and transparent, and will hold ourselves to account for our commitment to safeguard children and young people. Safeguarding concerns can be raised and discussed, poor practice and inappropriate behaviour challenged and addressed, and our safeguarding measures continuously reviewed and strengthened to ensure we remain accountable to children, young people, and their families.

8. We will act on safeguarding concerns, ensuring that our actions are timely, appropriate and centred around the child or young person, taking into account their gender and other specific safeguarding needs and vulnerabilities.

9. We work together in partnership with other agencies to promote the safeguarding of children and young people within organisations engaged with us and in the wider community.

10. Our safeguarding approach recognises and responds to the specific safeguarding risks and needs of the differing gender and other identities. It takes appropriate measures to address gender bias and other forms of discrimination and violence which may arise as a result of these. It supports the empowerment and fosters the inclusion of girls in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection.

11. Our safeguarding approach is mainstreamed in all stages of our operations, thematic portfolios, programmes, projects, activities, influencing work, and interventions in both development and humanitarian settings thus ensuring that these are designed and delivered in a manner that does no harm to children and young people.

In light of our commitment and accompanying principles, we give the highest priority to the safety and protection of children and young people. We will ensure our Staff, Associates, and Visitors are supported to meet their safeguarding responsibilities and requirements, understand the specific risks to children and young people of differing gender and other identities and how they can work and engage in ways that increase the safety and protection of children and young people with whom we are in contact. Our Safeguarding Implementation standards lays down the requirements for ensuring safeguarding measures are embedded in all parts of our operations and interventions.

## SANCTIONS

Breaches of this policy will be investigated in accordance with disciplinary procedures and contractual agreements, or a referral may be made to statutory authorities for criminal investigation under the law of the country in which they work. Breaches may incur sanctions including disciplinary action leading to possible dismissal, termination of all relations including contractual and partnership agreements, and where relevant, appropriate legal or other such actions. If a legitimate concern about the suspected abuse of a child or young person is raised but proves to be unfounded on investigation, no action will be taken against the reporter. However, appropriate sanctions will be applied in cases of false and malicious accusations.

## ROLES AND RESPONSIBILITIES

1. **All Staff, Associates and Visitors shall:**

- a. commit and contribute to an environment where children and young people feel respected, supported, safe and protected
- b. never act or behave in a manner that results in violence against a child or young person or places a child or young person at risk of violence;
- c. be aware of and adhere to the provisions of this Global Policy.

**2. All Staff shall:**

- a. comply with this Global Policy, including the Safeguarding Code of Conduct (Annex 1); and
- b. report and respond to safeguarding concerns and breaches of the policy in line with the applicable procedures of the applicable CNCF International Entity.

**3. Associates and Visitors shall:**

- a. agree, by signing, to complying with either: i. the Safeguarding Code of Conduct (Annex 1); or ii. other appropriate guidance developed by a Manager at the relevant CNCF International Entity on appropriate behaviour towards children and young people as relevant to their engagement using the Safeguarding Code of Conduct (Annex 1) as a guide; or
- b. comply with his/her own Code of Conduct, provided the contracting Manager ensures that it complies and is consistent with this Global Policy.

**4. Managers shall ensure that:**

- a. Children, young people and communities with which we engage, work or are in contact are made aware of the provisions of this Global Policy to ensure they have the confidence and ability to report any incidents occurring against children and young people;
- b. Staff, Associates, and Visitors are aware of the Safeguarding Implementation Standards that are applicable to their role or engagement with us;
- c. they support and develop systems which maintains an environment which is safe for and prevents violence against children and young people; and
- d. they are accountable for ensuring that the policy is fully embedded within their areas of responsibility in accordance with the Safeguarding Implementation Standards (Annex 2).
- e. All Staff, Associates, and Visitors have access to a copy of this Child Protection Policy in both English and in the language of the respective countries CNCF operates in. The Policy is posted on CNCF's intranet, in the Policy section, and is also kept in all office and meeting spaces at CNCF's centres for access by staff, visitors, donors, partner organisations, and families.
- f. Children have access to a child friendly version of the Code of Conduct and guidelines for reporting and investigation.
- g. These guidelines are displayed in all facilities run by CNCF.
- h. The child protection Code of Conduct is mandatory for all Staff, Associates and Visitors to sign and adhere to. The Code of Conduct outlines the behaviour expected of all persons who interact with CNCF children and young people. It is an integral part of this policy. Refer to Appendix 1: Code of Conduct.

**5. Directors shall ensure that:**

- a. the relevant CNCF International Entity has in place local procedures that are consistent with this Global Policy and which outlines the reporting requirements and the manner in which they are escalated within each CNCF International Entity. These local procedures should be developed with the assistance of local advisers and updated regularly. The policy and applicable procedures must be made available in local languages and child-friendly formats; and
- b. the relevant CNCF International Entity implements our Safeguarding Implementation Standards as they apply to their context, the people (Staff, Associates, and Visitors), children and young

people with whom they engage, as well as the processes, programmes, projects, events and activities they undertake.

6. Organisations that work with us in carrying out our programmes, projects, processes, events and/or activities involving children and young people must comply with the Safeguarding Guidelines contained in Annex 2.
7. All CNCF International Entities shall monitor compliance with this Global Policy through the mandatory tracking and auditing of the Safeguarding Implementation Standards and Safeguarding Code of Conduct (see Annex 1). Auditing against the standards will be led by CNCFI Child Protection Assurance Committee (CPAC). In addition, we will work with and ensure the participation of children, young people, staff, associates and visitors to review, monitor and evaluate the implementation of this Global Policy.

## TERMS AND DEFINITIONS

When used in this document:

**“Abuse”** Child abuse happens to male and female children of all ages, ethnicity and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion. Abuse includes physical, sexual, emotional, neglect, child labour and family violence. Abuse can be committed by any adult, including parents, teachers, strangers, or any person working with children in a position of trust. Abuse can also be committed by other children.

- **Physical abuse:** the use of physical force against a child that results in harm to the child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning.
- **Neglect:** the failure by a parent or caregiver to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and wellbeing.
- **Emotional abuse:** refers to a parent or caregiver’s inappropriate verbal or symbolic acts toward a child, or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child’s self- esteem or social competence
- **Sexual abuse:** the use of a child for sexual gratification by an adult or significantly older child or adolescent. Sexually abusive behaviours can include fondling genitals; masturbation; oral sex; vaginal or anal penetration by a penis, finger or any other object; fondling breasts; voyeurism; exhibitionism; and exposing the child to, or involving the child in, pornography<sup>1</sup>

**“Associate”** refers to a range of contracted paid and non-paid individuals who have committed to work with or support a CNCF International Entity. It includes, among others, board members, volunteers (including community volunteers), interns, sponsors, researchers, donors, consultants and contractors, staff and/or representatives of partner organisations and local governments (when operating in partnership agreement with a CNCF International Entity).

**“Best Interest of the Child”** Article 3 of the UNCRC states that “the best interest of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers”.

**“Bullying”** is the inappropriate use of power by an individual or group, with intent to injure either physically or emotionally. It is usually deliberate and repetitive. The bullying may be physical or psychological (verbal and non-verbal). Cyberbullying refers to bullying through information and



communication technologies such as online chat rooms, sexting, Facebook or other social media. Bullying can involve humiliation, domination, intimidation, victimisation and all forms of harassment including that based on sex, race, disability, homosexuality or transgender.

- Physically, bullying includes pushing, hitting, punching, kicking or any other action causing hurt or injury
- Verbal bullying includes insults, taunts, threats and ridicules
- Psychological bullying includes physical intimidation and ostracism

“**CEO**” refers to the Christina Noble Children’s Foundation Chief Executive Officer

“**Child**” in line with the United Nations Convention on the Rights of the Child and for the purposes of this Global policy, is defined as any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1). (See definition of Young Person/People or Youth below).

“**Child Abuse and exploitation materials**” This refers to material that depicts (expressly or implicitly) a child under 18 years of age as a victim of torture, cruelty or physical abuse; or which may be classified as child pornography material.

“**Child Labour**” Child labour is work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of “work” can be called “child labour” depends on the child’s age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries. The answer varies from country to country, as well as among sectors within countries. (Source: International Labor Organisation). It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and
- interferes with their schooling by depriving them of the opportunity to attend school by obliging children to leave school early

“**Child protection**” is the term used to describe the responsibilities and activities undertaken to prevent or stop children being harmed.

“**CNCFI**” refers to Christina Noble Children’s Foundation International. It generally includes international headquarters, regional offices, liaison offices, and members country offices.

“**CNCFIB**” refers to the Christina Noble Children’s Foundation International Board

“**Commercial exploitation**” is a commercial transaction that involves the sexual exploitation of a child, such as the prostitution of children and child pornography. ... 'sexual abuse by the adult and remuneration in cash or kind to the child or a third person or persons.

“**CPAC**” refers to Child Protection Assurance Committee in international headquarters

“**CPFP**” refers to Child Protection Focal Point Manager in regional offices, liaison offices, and members country offices

“**Director**” is an Executive Director of CNCF International or a National Director.

“**Duty of care**” is a common law concept that refers to the responsibility of the organisation and individuals within the organisation to provide children with an adequate level of protection against

harm. It is the duty of the organisation to protect children from all reasonably foreseeable risk of injury.

**“Exploitation”** refers to the use of a child in work or other activities for the benefit of others and to the detriment of the child’s physical and mental health, development and education. Exploitation includes, but is not limited to, child labour, and child sexual exploitation.

**“Grooming”** Grooming occurs when someone builds an emotional connection with a child in order to gain their trust for the purposes of sexual abuse, sexual exploitation, or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional.

**“Harm”** is any detrimental effect on a child’s or young person’s physical, psychological, or emotional wellbeing. Harm may be caused by abuse or exploitation whether intended or unintended.

**“Manager”** refers to a Staff member who has responsibility for line managing or supervising the work of Staff or Associates.

**“National Organisation”** refers to a legal entity that has signed a Members’ Agreement and License Agreement with CNCF Entities

**“Partner”** For the purposes of this policy, partner refers to any organisation or person (such as an external service provider or vendor) that CNCF works with to deliver services in Vietnam and Mongolia.

**“Safeguarding children and young people”** is the responsibilities, preventative, responsive and referral measures that we undertake to protect children and young people, ensuring that no child or young person is subject to any form of harm as a result of their association with the organisation. This includes, ensuring that their contact with us and those associated with us and/or their participation in our activities, interventions and operations is safe and where there are concerns over a child or young person’s welfare or where a child or young person has been subject to violence, appropriate and timely actions are taken to address this and incidents are analysed so as to ensure continued learning for CNCF International Entities.

**“Safeguarding - Gender Responsive Safeguarding”**<sup>1</sup> is a safeguarding approach that:

- takes full account of gender in considering the specific safeguarding needs of girls, boys and other gender identities;
- integrates safeguarding measures that address protection risks for children and young people (girls, boys, young women, young men, and children of other gender identities) that stem from issues relating to gender bias and discrimination; and
- supports the empowerment and fosters the inclusion of girls, particularly in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection

**“Staff”** refers to individuals who receive a regular salary for work in any CNCF International Entity as well as individuals paid by or through a CNCF International Entity but located in another entity.

**“Sexual exploitation”** refers to the sexual abuse of children and youth through the exchange of sex or sexual acts for drugs, food, shelter, protection, other basics of life, and/or money. Sexual exploitation includes involving children and youth in creating pornography and sexually explicit websites.

---

<sup>1</sup> A working definition developed by PPI Child and Youth Safeguarding Unit

“**Screening**” refers to the actions taken to ensure that anyone engaged to work or volunteer with CNCFI does not have a past history of abusing children and is suitable to work with or be near children.

“**Violence**” against a child or young person includes all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation of a child or young person. Acts of violence can also take place online through, for example, the web, social media or mobile phones. It may be an intentional act involving the use of physical force or power or it may be failing to act to prevent violence against a child or young person. Violence consists of anything which individuals, groups, institutions or organisations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to the child or young person’s wellbeing, dignity and survival and development.

“**Visitor**” refers to a range of persons who are visiting our offices or programmes and may come into contact with children and young people through a CNCF International Entity, including journalists, media, researchers, visiting sponsors and celebrities.

“**Young Person/People**” or “**Youth**” in line with United Nations definitions, include individuals – young women, young men, and young persons of other gender identities - aged 15 years to 24 years old. This group spans the categories of ‘children’, ‘adolescents’ and ‘adults’ but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adult

## REPORTING AND INVESTIGATION PROCESS

### Mandatory Reporting of Concerns

1. All Staff, Associates, and Visitors are Mandatory Reporters for any child protection concerns that may be in breach of this and local policies and who do not need to have any proof of a breach; it is enough to report a suspicion or concern. If an allegation is against the CEO, this must be reported directly to the Chair of CNCF International Board (**CNCFIB**)
2. The Child Protection Focal point (**CPFP**) is required to inform their Country Director in respective countries, who will immediately inform the the CEO, or CPFP will report directly to the CEO should there be any concerns in reporting directly to the Country Director. The CPFP will work with the Child protection Assurance Committee (**CPAC**) leader to triage reports and plan response and conduct investigation with guidance from the Director of Operations and/or the CEO.
3. If requested by CPAC, the reporting member must also provide a written incident report within 24 hours of the verbal notification to the CPFP. The CEO is required to inform the CNCF International Board of any serious concerns or breaches of the child protection Code of Conduct.
4. All staff have the right to report a child protection complaint directly to the Chair of CNCF International Board, regardless of who is involved in the breach, if they are not satisfied that a proper response to a complaint has been made by the CPFP, Director, CEO or CPAC.
5. Contact details for Child Protection Focal Points, Child Protection Assurance Committee, the CEO and Chair of CNCFIB are included in this policy and local policies and posted on the website in the Child Protection Policy section

Reporting a child protection concern procedure

**Who can report-**

- Children
- Parents, Guardians or other adults
- Partner organisations
- CNCF Staff, Associates, Visitors

### **What to report**

- Any concern reported by a child
- If you see something concerning
- If you hear of a concern

### **When to report**

All concerns should be reported as soon as possible and within 24 hours (verbal or written) CPAC will determine whether a written report is required

### **Who to report to**

- Report directly to a Country Director or Child Protection Focal Point (CPFP) in respective countries
- Any allegation against the CEO must be reported directly to the Chair of CNCFIB

### **What will happen to your report**

- Every reported breach will be taken seriously and treated in confidence
- CPFP, Country Director and CEO will be informed, and if necessary other CPAC members will be involved
- CPAC will conduct an investigation into the concern if warranted
- The CEO is required to immediately inform the Chair of CNCFIB of any serious breach of the code of conduct

### **Confidentiality**

- a. The reporting of concerns and suspicions is confidential. No staff member who reports a concern shall have their position at CNCF placed at risk as a result. Every reported concern will be treated in confidence. There may be times when management is unable to maintain confidentiality, such as when a matter must be reported to police.
- b. The CEO & CPAC Leader will keep incident reports and investigation documents filed in a passwordprotected file.

### **Investigation Procedure**

The overriding principles when dealing with child and young people safeguarding and protection concerns is always the best interests of the child/young person. CPAC is responsible for conducting the management of the investigation and will call on external support if needed.

Where the incident is reasonably proven to have occurred, and depending on the severity of the breach, disciplinary measures will be taken in line with the Human Resources manual.

# CHILD AND YOUNG PEOPLE PROTECTION RESPONSIBILITIES AND DELEGATIONS

All people associated with the Christina Noble Children's Foundation, regardless of their position, have a responsibility to care for and protect children above any other responsibility or role that they may have.

## **All Staff, Associates, and Visitors will**

- Commit to the principles stated in this Policy
- Agree to and sign the Child Protection Code of Conduct
- Participate in Child Protection induction and annual training where applicable
- Adhere to the mandatory procedures for reporting Child Protection concerns
- Avoid undertaking any investigation of alleged breaches of this policy and the Code of Conduct
- Report directly to the Chair of CNCFIB if the concern or breach is suspected to be by the CEO
- Report directly to the Chair of CNCFIB if they are not satisfied that a proper response to a complaint has been made by the CFPF, Director, CEO and/or CPAC
- Direct service delivery staff to ensure all children receive training in child protection and are aware of the age-appropriate process of reporting any incident or seeking help.
- Raise awareness in the communities on child protection and CNCFI child protection policy

## **Child and Young People Safe Recruitment**

CNCFI follows child and young people safe recruitment practices for all Staff, Associates, and Visitors in the organisation. This includes the use of screening practices, verbal references, police checks, disclosure of criminal background through a Declaration, targeted behavioural interview questions and a probation period. Any person who may pose an unacceptable risk to the safety of a child will not be engaged at CNCFI in any capacity.

## **Induction and training**

All new Staff and Associates undergo an induction which includes training in CNCFI's child and young people's protection policy and signing of the Code of Conduct.

Annual training in child and young people's protection is mandatory for all staff. Ongoing related training is provided for all staff throughout the year.

Volunteers and Interns are required to participate in tailored child and young people's protection training through regular meetups and supervision with their supervisor.

## **Child Protection Risk Assessment**

CNCFI is a child-focused organisation and works with highly vulnerable children and young people. All Staff, Associates, and Visitors are required to be aware of potential risks to children and young people at all times.

In addition to ongoing awareness of potential risks to children and young people, CPAC will conduct an annual organisational risk assessment. An organisational Risk Register will be maintained, which all Program Managers and Coordinators will contribute to. This Register will be reviewed annually and if

necessary, updated. If circumstances change during the year period, an assessment will be conducted sooner. Any time there is a serious breach of the code of conduct, an organisational risk assessment will automatically be conducted.

### **Exceptional Circumstances**

CNCFI works in a very dynamic and unpredictable environment where sometimes our work with children and young people doesn't fit neatly into our own guidelines. All decisions and actions that are made in exceptional circumstances must be made in consultation with the Country Director, CPAC and CEO, and always in the best interest of the child and/or young person. The CEO will inform the Chair of CNCFIB of any exceptional circumstances.

### **Review of Global and Local Policies**

CNCFI Global and Local Policies will be reviewed every 2 years. In addition, the CPAC reviews the implementation of these policies each year.

Global and Local Policies can be updated at any time by the CEO, with input from the CPAC, and all changes must be approved by CNCFI.

## **ANNEX 1: SAFEGUARDING AND CODES OF CONDUCT**

## **ANNEX 2: GUIDELINES FOR IMPLEMENTING SAFEGUARDING IN PRACTICE**

## ANNEX 1: SAFEGUARDING AND CODES OF CONDUCT

Christina Noble Children’s Foundation International (**CNCFI**) is committed to creating a safe environment for children and young people. All staff have a duty to uphold the principles of the Global Policy on Safeguarding Children and Young People and commit to maintaining an environment that prevents violence against children and young people. Further to this, sexual exploitation and abuse by staff constitutes acts of gross misconduct and is therefore grounds for termination of employment.

CNCFI Safeguarding Code of Conduct should be read in conjunction with its Child Protection Policy. All staff, board members, partners, interns and volunteers must read, sign and abide by the Code of Conduct. The Code of Conduct is intended to guide all staff and volunteers to make ethical decisions and ensure the protection/safeguarding of children. CNCF’s ability to ensure the protection of children that it works with depends on the commitment and ability of its staff and volunteers to uphold and promote the highest standards of care, best practice, ethical and professional conduct.

All people working with the Christina Noble Children’s Foundation in any capacity, paid or otherwise, must agree and abide to the following:

I \_\_\_\_\_ am accepting the position of \_\_\_\_\_ at the Christina Noble Children's Foundation.

**I have read the Christina Noble Children’s Foundation Child Protection Policy. I understand the responsibilities of all people when working with children at CNCF and I will abide by the Safeguarding Code of Conduct.**

### **As such, I agree that I will:**

- a. Adhere to the Global Policy on Safeguarding Children and Young People and be open and honest in my dealings with children and young people, their families, and communities participating in programmes, projects, processes, events, and activities.
- b. Treat children and young people in a manner which is respectful of their rights, integrity, and dignity and considers their best interests regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, or any history of conflict with the law.
- c. Create and maintain an environment which prevents the abuse and exploitation of children and young people ensuring that I am aware of potential risks with regards to my conduct and work, and take appropriate action so as to minimise risks to children and young people.
- d. Contribute to building an environment where children and young people we engage with are: i. respected and empowered to participate in and discuss decision making and interventions into their safeguarding in accordance with their age, maturity and evolving capacities; and ii. well informed on their safeguarding and protection rights and what to do if they have a concern.
- e. Display high standards of professional behaviour at all times, providing a positive role model for children and young people.

f. Comply with all relevant international standards and local legislation in relation to child labour, and refrain from using children and young people aged below 18 years for domestic or other labour, if such work is inappropriate, exploitative or harmful given their age or developmental capacity, which interferes with their time available for education and recreational activities, or which places them at

significant risk of injury, exploitation, or violence. In addition, I understand that I must not use children and young people of any age that we work with for domestic or other labour.

g. Respect the privacy and confidentiality of children and young people associated with CNCF.

### **This means I will:**

- Never ask for or accept personal contact details or invitations to share personal contact details (this includes email, phone numbers, social media contacts, address, webcam, skype, etc.) from any child or family associated or formerly associated<sup>2</sup> with our work or share my own personal contact details with such individuals except where this has been explicitly authorised by CNCF Director of Operations and/or CNCF International for business purposes.<sup>3</sup>
- Never disclose, or support the disclosure of, information that identifies sponsored families or children, through any medium, unless that disclosure is in accordance with standard CNCF International policies and procedures and/or has the explicit consent of the Director of Operations and/or CNCF International for business purposes<sup>4</sup>. Media includes paper, photographs, and social media.
- Never make any contact with a child, young person, or family members associated with CNCF's work that is not supervised by a (or another) member of CNCF Staff. Such contact may include but is not limited to visits and any form of communication via social media, emails, and letters.
  - Always ensure that when on an official or work visit with CNCF and I wish to take pictures of children and young people associated with the organisation, for personal use, I will:
    - Always consult first with the local CNCF office so as to make sure that it is permissible to take pictures in the local context and that the intended use of the pictures does not conflict with CNCF International's policies.
    - Ask permission of the child or young person (or in the case of young children, their parent or guardian) informing them of the specific purpose(s) and intended use (including how and where) and respect their decision to say no making it clear that there will be absolutely no negative repercussions from denying such consent.
    - Ensure the images are respectful and do not impact negatively on their dignity and privacy.
    - Ensure that the use of the images does not put the child or young person at risk of being identified or located.
    - Never upload the images of children and young people associated with CNCF to non-CNCF social media pages without the full and explicit consent of CNCF International<sup>5</sup>

h. Report and respond to any concerns, suspicions, incidents or allegations of actual or potential abuse to a child or young person in accordance with applicable procedures of the engaging office.

i. Cooperate fully and confidentially in any CNCF investigation of concerns or allegations of abuse to children and young people.

---

<sup>2</sup> Where the child is a sponsored child requests for continued communication upon 'graduation' of the sponsorship (when the sponsored child reaches 18 years) must comply with CNCFI Sponsorship guidelines on the same.

<sup>3</sup> CNCF will seek informed consent as appropriate from the child or young person.

<sup>4</sup> CNCF will seek informed consent as appropriate from the child or young person

<sup>5</sup> CNCF will seek informed consent as appropriate from the child or young person and parents or guardians where applicable



j. Immediately disclose all charges, convictions, and other outcomes of an offence, which occurred before or occurs during association with CNCF that relate to exploitation and abuse of a child or young person.

### **I will not:**

a. Abuse or exploit a child or young person or behave in any way that places a child or young person at risk of harm, including through harmful traditional practices such as, for example, Female Genital Mutilation, forced or child marriage.

b. Engage in any form of sexual activity or develop physical/sexual relationships with anyone under the age of 18 regardless of the age of consent locally. Mistaken belief in the age of a child is not a defence.<sup>6</sup>

c. Engage in sexual relationships with CNCF youth direct beneficiaries aged 18 to 24 years as these undermine the credibility and integrity of CNCF's work and are based on inherently unequal power dynamics.<sup>7</sup>

d. Use physical punishment/discipline or use of physical force of any kind towards children and young people.

e. Engage young people in any form of sexual activity which involves the exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of assistance that is due to beneficiaries.<sup>8</sup>

f. Use language or behave towards a child or young person in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate.

g. Fondle, hold, kiss, hug or touch children or young people in an inappropriate or culturally insensitive way.

h. Have a child/children/young person with whom I am in contact in a work related context, stay overnight at my home or any other personal residential location or accommodation.

i. Sleep in the same room or bed as a child or young person with whom I am in contact in a work related context. Where it is necessary to sleep close to unaccompanied children and young people, I will make sure that another adult is present and it is in line with authorised procedures.

j. Do things of a personal nature for children or young person, with whom I am in contact in a work related context, (e.g. taking a child/young person to the toilet/bathroom; helping them get un/dressed etc.) that they can do for themselves.

k. Spend time alone away from others with children and young people with whom I am in contact in a work related context; I will always make sure that another adult is with me and/or I am with the child/young person in an open public place, where others are around and in plain view of others. I. Hit or otherwise physically assault or physically abuse children or young people.

---

<sup>6</sup> ST/SGB/2003/13: UN Secretary-General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse, 2003 (endorsed by CNCF).

<sup>7</sup> We recognise that our incentive Workers and Community Volunteers live in communities where we operate and so on rare occasions, relationships may develop that may be seen as acceptable in the community but would breach this element of the code. However, we expect Incentive Workers and Community Volunteers working in Programme areas to make known to the relevant manager any potentially compromising relationship they are in or considering, that involve a beneficiary who is aged 18 years and above

<sup>8</sup> ST/SGB/2003/13: UN Secretary-General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse, 2003 (endorsed by CNCF).

- m. Act in ways that shame, humiliate, belittle or degrade children and young people, or otherwise perpetrate any form of emotional abuse.
- n. Discriminate against, show differential or preferential to, or favour particular children and young people to the detriment of them or others.
- o. Develop relationships with, engage in any practice with or develop behaviour towards children and young people which could in any way be deemed or interpreted as exploitive or abusive.
- p. Condone or participate in behaviour of children or young people which is illegal, unsafe, or abusive.
- q. Use any computers, mobile phones, video and digital cameras, or any such medium to exploit, harass or bully children or young people.
- r. Use computers, mobile phones, or video/digital cameras or other electronic devices, to access, view, create, download, or distribute pornography, especially abusive images of children or young people.

**The above is not an exhaustive list. Staff, Associates, and Visitors should consider all related actions and behaviour which may compromise the rights and safeguarding of children and young people.**

**Personal Conduct outside Work or Engagement with Us**

We do not dictate the belief and value systems by which Staff, Associates, and Visitors conduct their personal lives. However, actions taken by them out of working hours that are seen to contradict this policy will be considered a violation of the policy. Our Staff, Managers, Associates, and Visitors are required to adhere to principles of the Global Policy on Safeguarding Children and Young People both at work and outside work.

**I have fully disclosed to the Christina Noble Children’s Foundation any information that is relevant to an assessment of my suitability to work with or be near children and young people.**

**I understand that the responsibility is on me, as a person associated with the Christina Noble Children’s Foundation International, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.**

**I understand that at all times I can contact CNCF’s CEO, Project Operations Directors, or my supervisor to talk to about any aspect of the Child Protection Policy that remains unclear.**

**Name** \_\_\_\_\_

**Signature** \_\_\_\_\_

**Date** \_\_\_\_\_

For volunteers who may be onsite with schools and who are aged under 18 yrs at the time of application, the co-signature of a parent or guardian is required:

**Name of parent/guardian** \_\_\_\_\_

**Signature** \_\_\_\_\_

**Date** \_\_\_\_\_

## ANNEX 2: GUIDELINES FOR IMPLEMENTING SAFEGUARDING IN PRACTICE

These guidelines outline the requirements for safeguarding children and young people that are applicable to local partners and organisations that work with CNCF Entities in carrying out our programmes involving children and young people. They are particularly applicable to organisations assessed as having contact with children and young people, working with children and young people, and/or whose projects, programmes, processes, activities, advocacy and influence work impact on children and young people. Organisations funded by a CNCF Entity are expected to build on these guidelines as appropriate based on the nature of their activities and risks to children and young people. The guidelines illustrate our commitment to support and respect children's and young people's rights to be protected from harm, and to provide a safe and protective environment for children and young people who are involved with any programmes funded by CNCF Entity.

**The guidelines should be applied in relation to children and/or young people as appropriate, depending on the group the organisation works with.**

- 1. Prevention:** The Organisation must take appropriate measures to manage child and/or youth safeguarding risk factors and prevent abuse and exploitation before it occurs. Prevention measures should include organisational safeguarding policies, codes of conduct and associated procedures; the management of safeguarding risks in relation to its operations, activities and interventions; and the production and promotion of 'child and young person friendly' safeguarding information and resources.
- 2. Code of Conduct:** Each Organisation is required to ensure that their personnel avoid any behaviour or conduct that compromises the safety and protection of children and/or young people within its activities, operations and programmes. In addition, programmes and activities working directly with children and/or young people or involving direct contact between the same should develop guidance on expected and acceptable behaviour for children and/or young people towards each other. This should be incorporated into policy and practice documents.
- 3. Gender Equality and Non-Discrimination:** The Organisation should ensure that all Safeguarding Children and/or Young People policies and procedures take into account gender equality and non-discrimination requirements. Recognising that girls, boys, young women, young men, and children and young people of different gender identities may face different risks relating to their safety and protection and that all children and/or young people have an equal right to protection, irrespective of: age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, or class.
- 4. Screening Procedures:** There should be detailed screening procedures for all personnel (including unpaid volunteers) who will come into contact with children and/or young people (directly or indirectly). Screening procedures should be as available in each country and updated on a regular basis, where possible. Screening procedures must include: certificate of good conduct, police reference checks or equivalent, verification that applicants are not listed in national registries of child offenders; a detailed application and interview process; references who support the applicant's suitability to work with children and/or young people.
- 5. Awareness:** The Organisation should ensure that all personnel, sub-contractors or consultants or affiliates involved with children and young people's programmes are aware of safeguarding risks,

policies and procedures; and their safeguarding responsibilities. In addition, children and/or young people engaged and their parents, guardians or carers should be informed of the same so that they know what behaviours to expect and how to report any concerns.

**6. Capacity Building:** The Organisation should develop the capacity of all who work with and for children and/or young people to appropriately prevent, detect, report and respond to safeguarding concerns and particularly as they pertain to differing gender and other identities. Efforts should be made to ensure organisational policies and practices are understood and can be effectively implemented through mandatory inductions and on-going training courses for all employees and volunteers and other associates.

**7. Participation of children and/or young people:** Children and/or young people should be actively, meaningfully and ethically involved in the development of safeguarding measures in accordance with their evolving capacities. Children and/or young people must not be treated simply as objects of concern but rather listened to and taken seriously and treated as individual people with their own views.

**8. Reporting Mechanisms for children and/or young people and Staff:** Mechanisms should be established that enable the safe reporting of safeguarding concerns. Such mechanisms should ensure appropriate escalation of concerns within the organisation, referral to the appropriate authorities and confidentiality. In addition, child and youth reporting mechanisms should be accessible, friendly and sensitive to their differing needs

**9. Response and Follow Up:** Organisational policies and procedures should include appropriate measures to support and protect children and/or young people when concerns arise. All measures taken to respond to a safeguarding concern should take into account the best interest of the child or young person and be sensitive to their differing gender and other identities ensuring they are kept safe and protected. Response measures should be appropriately risk assessed and endeavour to ensure no further harm comes to the child and/or young person as a result of any actions taken by the Organisation. Concerns should be written up and information kept in accordance with the privacy and confidentiality policies of the Organisation and/or local legislation. In addition, organisational processes should ensure response evaluation and follow up for organisational learning.

The Organisation should also advise CNCF International of any complaints of abuse to children and/or young people in line with the working agreement.

**10. Implementation, Monitoring and Review:** The implementation and monitoring the Safeguarding Children and/Young People Policy for each Organisation should be reviewed at regular intervals as determined necessary by the Organisation, preferably at least every three (3) years, where possible.

**11. Sanction and Discipline of Organisation personnel:** The Organisation policies and procedures should provide for appropriate sanctions and disciplinary measures which ensures children and young people are protected from further potential harm. This may include the immediate suspension of personnel until such time as the allegations are followed up and either substantiated or refuted and/or where personnel is convicted of abusing a child or young person, the said personnel is immediately terminated with cause from his or her position.

**12. Informed Consent:** The Organisation should provide children and/or young people (and their parent(s)/legal guardian(s) where applicable), with all necessary details (including on any associated risk,) to make an informed decision regarding their participation in programmes and activities, including any voice recordings, video or photographs of children and/or young people (including how and where these will be used). Participation and/or usage of information and/or images should only take place after consent is obtained.

**13. Protection of Personal Information:** Personal information regarding any Child or children and/or young people, whether or not such information is obtained as part of the programmes involving children and/or young people, should be treated strictly confidentially. There should be clear procedures showing the responsibilities within the organisation for accessing and using such data with appropriate authorisations. In addition, such data should not be disclosed to any third party, except in accordance with the policies of the Organisation or as required by applicable local laws. Personal information includes, but is not limited to, any information that can be linked to or used to identify a Child and/or Young Person.

**14. Working with partners:** The Organisation should ensure adequate safeguarding assessments are made as part of its due diligence processes when it comes to partnership working. Third party entities that are contracted or supported to work with children must be subject to the same safeguarding principles and approach outlined in the Organisations policy and procedures. Vendors, suppliers and other contractors that may be in direct or indirect contact with children must also be subject to appropriate safeguarding measures.

## CONTACTS FOR REPORTING A CHILD PROTECTION & SAFEGUARDING CONCERN

CEO	Helenita Noble	<a href="mailto:helenita.noble@cncf.org">helenita.noble@cncf.org</a> Tele: + 44 7932 517 513
Child Protection Focal Point (CPFP) Vietnam	Ms. Quy Dinh Ms. Hanh Nguyen	<a href="mailto:quy.dinh@cncf.org">quy.dinh@cncf.org</a> <a href="mailto:hanh.nguyen@cncf.org">hanh.nguyen@cncf.org</a>
Child protection Focal Point (CPFP) Mongolia	Ms. Amaraa Bor Ms. Uguumur Oyungerel	<a href="mailto:amaraa.bor@cncf.org">amaraa.bor@cncf.org</a> <a href="mailto:uguumur@cncf.org">uguumur@cncf.org</a>

NB: please note, when corresponding with the CPFP officers – please ensure you send to both names and emails provided for the country you are writing to. If not writing directly to the CEO, please ensure you CC them into your correspondence to the CPFP officers.

Thank you for contributing to the protection and safeguarding of children and young people.