

CHILD PROTECTION POLICY

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Introduction - Child Protection Policy

Samabhavana Society is committed to the well-being of the children it serves. One of the core values of the organization embraces the “intrinsic worth of each child.” The Mission refers to creating “...an environment of hope and respect for needy children...”

SAMABHAVANA SOCIETY strives to create positive environments in which children grow up amidst respect, hope and social justice. Recognizing the inherent worth of each child, SAMABHAVANA SOCIETY accepts its responsibilities to protect children from harm, to promote children’s rights and to ensure children’s healthy development.

The agency continually examines, develops and implements standards and programs designed to protect children from abuse, neglect, harassment and exploitation by staff, sponsors and others with whom they have contact.

This Child Protection Policy document is composed of two parts. The first part is the organization **Policy**. The second part is the **Standards** section, which has six sub-sections:

- Organization Awareness & Advocacy
- Recruiting and Screening of Personnel
- Program Planning
- Sponsorship
- Regional Training and Support
- Allegation and Incident Management

SAMABHAVANA SOCIETY is committed to a culture that empowers beneficiaries to be knowledgeable of their rights, to know what is acceptable and unacceptable, and to know what to do when there are problems.

At the center of a child safe organization is commitment that it will work aggressively so that its Code of Conduct becomes a way of life for all – the children, families, communities and staff. Child Protection – our culture – our responsibility.

1.0 Child Protection Policy for SAMABHAVANA SOCIETY Programs

Framed on the basis of the U. N. Convention on the Rights of the Child, SAMABHAVANA SOCIETY's work to promote children's holistic development aims to strengthen family and community systems that support child protection and well-being. Consistent with its mission, SAMABHAVANA SOCIETY strives to promote children's best interests and create positive environments in which children grow up amidst respect, hope, and social justice. Recognizing the inherent worth of each child, SAMABHAVANA SOCIETY accepts its responsibilities to protect children from harm, to promote children's rights, and to ensure children's healthy development. Since SAMABHAVANA SOCIETY works in situations that present serious physical, emotional, and social risks to children's well-being and that involve unequal power relations, it is vital to define clearly SAMABHAVANA SOCIETY's commitments to child protection. Through this policy, SAMABHAVANA SOCIETY defines its Code of Conduct to which all SAMABHAVANA SOCIETY staff and volunteer workers (SAMABHAVANA SOCIETY staff, board members, volunteers, interns, contractors, affiliated entity staff) in partner communities must adhere.

SAMABHAVANA SOCIETY recognizes that each country has its own legal systems. The policy and standards must be interpreted and enforced in accordance with local law. There may be instances where the policy and standards are more stringent than local law.

SAMABHAVANA SOCIETY is committed to a culture that empowers beneficiaries to be knowledgeable of their rights, to know what is acceptable and unacceptable, and to know what to do when there are problems.

Discrimination

Definition: Discrimination is unequal treatment of individuals or groups on the basis of personal characteristics such as disability or appearance or group characteristics such as ethnicity or religious orientation.

Examples

Examples of discrimination include, but are not limited to:

- Program services that benefit men more than women;
- Hiring preferences for one religion over members of other denominations;
- Use of demeaning labels or images in regard to particular ethnic groups;
- Passive acceptance of a situation in which disabled children are socially isolated and kept out of school;
- Stigmatization of or services denial to people on the basis of their HIV/AIDS status;
- Service delivery only to particular ethnic, religious, or political groups.

Policies:

SAMABHAVANA SOCIETY will not discriminate in its employment, program, or services on the grounds of religion, gender, race, ethnicity, national origin, language, sexual orientation, marital status, disability, age, or political conviction.

SAMABHAVANA SOCIETY will not discriminate against or show favor of particular children.

SAMABHAVANA SOCIETY will respect the cultures, practices, and traditions of all people and display cultural sensitivity to host communities and countries where it works.

SAMABHAVANA SOCIETY will promote gender equity in all its programs.

Harassment

Definition: Harassment consists of unwelcome comments or behavior that is offensive, demeaning, intimidating, or physically harmful.

Examples

Examples of harassment include, but are not limited to:

- Actual or threatened fighting;
- Name calling or use of threats, slurs, or degrading jokes;
- Use of visual means such as leering, gesturing, or displaying intimidating or demeaning pictures, cartoons, or posters;
- Writing of offensive or threatening letters, memos, or emails.

Policies:

SAMABHAVANA SOCIETY prohibits harassment of any employee, program participant, partner, vendor, or member of communities in which SAMABHAVANA SOCIETY conducts programs.

SAMABHAVANA SOCIETY employees and affiliated entity workers will treat each other and those whom they serve with respect and dignity.

SAMABHAVANA SOCIETY will hire and train representatives who treat all involved with the highest standards of respect.

SAMABHAVANA SOCIETY will hire/ train representatives of the highest integrity who are accountable, responsible and create an environment of openness for all involved.

SAMABHAVANA SOCIETY will maintain a safe environment where beneficiaries come to participate in SAMABHAVANA SOCIETY's activities.

SAMABHAVANA SOCIETY representatives will not use their relationship of authority inappropriately.

Sexual Harassment

Definition: Sexual harassment consists of unwelcome sexual advances, comments, jokes, or conduct of a sexual nature.

Examples

Examples of sexual harassment include, but are not limited to:

- Unwelcome sexual commentaries about a person, their manner, or appearance;
- Sexually suggestive or obscene letters, posters, or emails;
- Actual or threatened physical contact such as patting, pinching, or other offensive touching;
- Degrading jokes based on sexual orientation.

Policy:

SAMABHAVANA SOCIETY prohibits sexual harassment of any individuals, employee or program participant, regardless of their work relationship.

Exploitation

Definition: Exploitation is the abuse of power by coercing or leading people into activities that violates their individual's rights.

Examples

Examples of exploitation include, but are not limited to:

- Children's involvement in heavy, dangerous, or forced labor;
- Selling or buying children for economic gain (child trafficking);
- Recruitment of children into armed groups;
- Sending children to work in dangerous situations;
- A staff superior uses his or her power to coerce a subordinate to do things that are not part of the employee's job responsibilities.

Policies:

SAMABHAVANA SOCIETY prohibits exploitation of all individuals, whether staff, children, or participants in affiliated sponsorship program activities.

SAMABHAVANA SOCIETY staff will uphold the child labor laws of the country and ensure children are protected by these laws by reporting any witnessed or suspected exploitation.

Sexual Exploitation

Definition: Sexual exploitation consists of misusing a position of power to pressure or demand others to provide sexual favors.

SAMABHAVANA SOCIETY is a member of InterAction, an alliance of over 160 U.S. based international development and humanitarian non-governmental organizations. SAMABHAVANA SOCIETY has taken a leading role in InterAction's effort on Child Protection, including membership in a committee, which produced the June 2002, "Report of the InterAction Task Force on the Prevention of Sexual Exploitation of Displaced Children". SAMABHAVANA SOCIETY has based its policy on the core elements of this document.

Policies:

SAMABHAVANA SOCIETY adheres to the six core elements spelled out by the InterAction Task Force on the Prevention of Sexual Exploitation of Displaced Children:¹

- **Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.**
- **Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense.**
- **Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.**
- **Sexual relationships between humanitarian workers and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.**

¹ Different considerations will arise regarding the enforcement of some of these principles for humanitarian workers hired from the beneficiary community. While sexual exploitation and abuse and the misuse of humanitarian assistance will always be prohibited, discretion may be used in the application of the principles regarding sexual relationships for this category of humanitarian worker." This footnote is contained in the InterAction taskforce report and is intended to address situations such as the employment eligibility of a person who is married and his/her husband/wife is less than 18 years of age.

- **Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, s/he must report such concerns via established agency reporting mechanisms.**
- **Humanitarian workers are obliged to create and maintain an environment, which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.**

Prostitution and Sex Trafficking

Definition: Prostitution consists of providing sexual favors or activity in exchange for money or other economic gain. SAMABHAVANA SOCIETY follows the definition of sex trafficking outlined in the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, which prohibits the recruitment, transportation, transfer, harboring, or receipt of persons, sale, or transfer of person for purposes of commercial exploitation, including sexual exploitation.

Policy:

SAMABHAVANA SOCIETY opposes prostitution, sex trafficking, and other forms of trafficking in persons.

Child Abuse, Neglect and Safety

Definition: Child abuse consists of children's exposure to situations that cause children harm, usually as the result of the failure of the parent or caretaker to insure a reasonable standard of care and protection. Abuse may be physical, sexual, or emotional harm resulting from the actions of the parent or caretaker. Abuse also includes neglect, the failure to meet a child's basic needs or to protect the child from hazards such as extreme cold or playing in dangerous places.

Examples

Examples include, but are not limited to:

- Sexual abuse of children through touching, fondling, or rape;
- Involvement of children in pornography or showing child pornography via the internet;
- Harsh emotional treatment of children through isolation, rejection, or teasing;
- Severe physical punishment of children;
- Allowing children to play in dangerous places such as building rooftops and minefields.

Policies:

SAMABHAVANA SOCIETY staff and volunteer workers will not abuse children through either action or neglect.

SAMABHAVANA SOCIETY staff will work in a proactive manner to protect children's safety from preventable harm.

SAMABHAVANA SOCIETY representatives will avoid being placed in compromising or vulnerable positions.

SAMABHAVANA SOCIETY representatives will realize that they are always the responsible parties, even if a child behaves inappropriately, initiates an inappropriate relationship, or behaves in an unacceptable manner.

SAMABHAVANA SOCIETY representatives will not condone or participate in behavior of children which is illegal, unsafe or abusive.

SAMABHAVANA SOCIETY representatives will not provide shelter in their homes expect in cases of extreme emergency for a limited time.

SAMABHAVANA SOCIETY representatives will not put themselves in positions where their actions (physical, verbal or otherwise) are offensive, inappropriate, abusive, neglectful or exploitative.

SAMABHAVANA SOCIETY representatives will ensure that all confidential information is handled appropriately.

Reporting

All employees have an obligation to report violations of these policies. SAMABHAVANA SOCIETY will not tolerate any form of coercion, intimidation, reprisal, or retaliation against any employee who makes a report regarding a possible violation of this policy or who provides information or assistance in an investigation. See Child Protection Standards in the following section for details on reporting and investigating concerns.

Policy:

Due to the sensitivity of reporting and known underreporting of child protection incidents throughout child-focused international agencies, SAMABHAVANA SOCIETY offices will democratically select two staff members (one man and one woman) that will act as Point Persons for receiving incident reports, suspicions of violations, child abuse or known breaches of the Code of Conduct. Staff will report alleged violations to these staff “Point Persons” who, in turn, will report alleged violations simultaneously to the National Director and the Regional Representative. If the National Director is under suspicion of violation the point persons will report to the Regional Representative. If a person knowingly chooses not to report an incident, then s/he will be removed from any association with SAMABHAVANA SOCIETY. Anyone found in violation of the Code of Conduct will be subject to appropriate disciplinary action up to and including dismissal from employment.

Code of Conduct

The following Code of Conduct, although it is not part of SAMABHAVANA SOCIETY’s Child Protection Policy, provides a summary that is useful in helping local staff and SAMABHAVANA SOCIETY affiliated entities understand the key points of the policy and to relate it to the behavior expected of them.

Christian Children’s Fund representatives (SAMABHAVANA SOCIETY staff, board members, volunteers, interns, contractors, affiliated entity staff) will conduct themselves in a manner where the needs of the children are always the primary consideration. Representatives’ interactions with children, their families and community members must always meet the highest levels of integrity.

SAMABHAVANA SOCIETY recognizes that each country has its own legal systems. The policy and standards must be interpreted and enforced in accordance with local law. There may be instances where the policy and standards are more stringent than local law.

SAMABHAVANA SOCIETY acknowledges that its representatives will:

- maintain a safe environment where beneficiaries come to participate in SAMABHAVANA SOCIETY’s activities.
- organize work to minimize risks.
- hire/train representatives of the highest integrity who are accountable, responsible and create an environment of openness for all involved.
- hire/train representatives who treat all involved with the highest standards of respect.
- establish a culture that empowers beneficiaries to be knowledgeable of their rights, to know what is acceptable and unacceptable, to know what to do when there are problems.
- ensure that all confidential information is handled appropriately.
- encourage that breaches of the Code of Conduct are immediately reported to management, where prompt actions are expected. Anyone found in violation of the Code of Conduct will be subject to appropriate disciplinary action up to and including dismissal from employment.

In addition, representatives:

- will not discriminate in its employment, program, or services on the grounds of religion, gender, race, ethnicity, national origin, language, sexual orientation, marital status, disability, age, or political conviction.
- will not discriminate against or show favor of particular children.
- will respect the cultures, practices, and traditions of all people and display cultural sensitivity to host communities and countries where it works.
- will promote gender equity in all its programs.
- will not harass any employee, program participant, partner, vendor, or member of communities in which SAMABHAVANA SOCIETY conducts programs.
- will treat each other and those whom they serve with respect and dignity.
- will hire and train representatives who treat all involved with the highest standards of respect.
- will hire/train representatives of the highest integrity who are accountable, responsible, and create an environment of openness for all involved.
- will maintain a safe environment where beneficiaries come to participate in SAMABHAVANA SOCIETY activities.
- will not use their relationship of authority inappropriately.
- will not sexually harass any individuals, employee or program participant, regardless of their work relationship.
- will not exploit any individuals, whether staff, children, or participants in affiliated sponsorship programs.
- will uphold the child labor laws of the country and ensure children are protected by these laws by reporting any witnessed or suspected exploitation.
- will not abuse children through either action or neglect.
- will work in a proactive manner to protect children's safety from harm.
- will avoid being placed in compromising or vulnerable positions.
- will realize that they are always the responsible parties, even if a child initiates an inappropriate relationship or behaves in an unacceptable manner.
- will not condone or participate in behavior of children which is illegal, unsafe or abusive.
- will not provide shelter in their homes except in case of extreme emergency for a limited time.
- will not put themselves in position where their actions (physical, verbal or otherwise) are offensive, inappropriate, abusive, neglectful or exploitative.
- will ensure all confidential information is handled appropriately.

Finally, SAMABHAVANA SOCIETY representatives understand the following:

- Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employments.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age majority or age of consent locally. Mistaken belief in the age of a child is not a defense.
- Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.
- Sexual relationships between humanitarian workers and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.
- Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, s/he must report such concerns via established agency reporting mechanisms.
- Humanitarian workers are obliged to create and maintain an environment, which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.

2.0 Child Protection Standards

2.1 Organizational Awareness & Advocacy

Awareness:

Management will ensure that each SAMABHAVANA SOCIETY staff member shall sign a written statement indicating that s/he understands and will abide by the Code of Conduct.

All SAMABHAVANA SOCIETY representatives who have contact with children, or sensitive information about children, are to be informed of the organization's Child Protection Policy and are to be made aware that they are expected to comply with such policies and standards. Agency staff members are required to acknowledge receipt and understanding of the agency's policies and standards.

Child protection awareness will be included in hiring, orientation and training at headquarters, Country Offices and affiliated entities. Employee handbooks will include a section on child protection awareness. For those individuals having direct contact with children, additional training may be provided.

Advocacy:

SAMABHAVANA SOCIETY endorses the United Nations Convention on the Rights of the Child (see chapter 2 – Advocacy for Children's Rights). The agency encourages its Country Offices to collaborate with governmental organizations, child care organizations and other professional agencies to promote children's rights, raise awareness of the plight of children and seek public policy changes where necessary. Increased awareness ensures staff and donors are sensitized to issues negatively affecting children. Increased awareness leads to actions that minimize or prevent risks for children.

SAMABHAVANA SOCIETY believes that one of the greatest defenses against child abuse and neglect is a raised consciousness, among children and families, of children's rights and therefore of adult behaviors which are unacceptable. SAMABHAVANA SOCIETY's promotion of community cohesion and child rights through parent bodies, youth groups, children's councils, etc. creates an environment where strong community feedback and protection mechanisms are central.

2.2 Recruiting and Screening of Personnel

A critical part of SAMABHAVANA SOCIETY's commitment to the protection of the children it serves requires that staff be aware of and meet basic requirements of employment, including those requirements related to child protection.

2.2.1 Prospective Representatives of Christian Children's Fund

Prospective employees, Board of Director candidates, advisory council candidates, volunteers, interns, and contracted consultants who will be visiting or working with SAMABHAVANA SOCIETY affiliated entities and children, are informed of SAMABHAVANA SOCIETY's Child Protection Policy during the recruiting and hiring processes.

2.2.2 Criminal Background Record Check

SAMABHAVANA SOCIETY reserves the right to perform a criminal background check on current or prospective employees and others seeking contract or affiliation with the agency. SAMABHAVANA SOCIETY notifies current and prospective employees of this policy. In the best interests of children, SAMABHAVANA SOCIETY will not knowingly employ anyone with a conviction for child abuse, pedophilia or a related offense. In the event that local law prohibits this hiring rule, no person with a conviction for child abuse, pedophilia or a related offense may be hired into any position that includes direct access to children or personal information about children. SAMABHAVANA SOCIETY will make every reasonable effort to protect children in this regard by implementing effective procedures (including criminal background checks and/or reference checks when deemed appropriate).

2.3 Program Planning

Children are considered active participants in their own protection. SAMABHAVANA SOCIETY programs will give them a voice and provide them with skills for protecting themselves. However, the primary responsibility for the

protection of children lies with the parents and other adults within the community. SAMABHAVANA SOCIETY program planning will include child protection as one of the primary concerns and objectives of the Country Office's business plans.

Another integral part of program planning includes ongoing assessments of children's circumstances and needs. Where relevant, plans will include working with communities, local agencies, governments, etc. to reduce the risks of and respond to abuse, neglect and exploitation facing children.

2.4 Sponsorship

Sponsors and their sponsored children have wonderful opportunities to establish rewarding relationship among themselves. To ensure relationships are appropriate, various safeguards and procedures have been established.

Communication with sponsored children through the proper channels, such as e-mail, letter writing or personal visits, is encouraged. It has the potential of significantly impacting the development of the child/sponsor relationship and cultural education of the sponsor.

To protect both the sponsor and child/family, it is critical that policies and guidelines of child-sponsor communication be strictly followed. Inappropriate correspondence and/or contact will not be allowed. Failure to adhere to the guidelines may result in:

- cancellation of the sponsorship
- removal of the sponsor from SAMABHAVANA SOCIETY's accounts
- removal of the child/family from affiliated entity enrollment
- termination of employment of SAMABHAVANA SOCIETY staff
- removal of affiliated entity staff from affiliated entity activities
- closure of the affiliated entity

2.4.1 Correspondence

Correspondence through letter writing and/or e-mail offers opportunities for the sponsors and children to develop close relationships. Sponsors can demonstrate their care and support to their children by asking questions of the children, reinforcing their accomplishments and sharing their own lives.

Children and sponsors being served through Christian Children's Fund have the right to be secure from accidental or intentional abuse or inappropriate contact by a sponsor, a child or any other person associated with the organization.

All correspondence is reviewed by SAMABHAVANA SOCIETY staff before delivery to sponsors or children for appropriate content, cultural sensitivity and to ensure the confidentiality of the children and sponsors remains intact. In the event of inappropriate correspondence, SAMABHAVANA SOCIETY may terminate the sponsorship relationship. Addresses and contact information are never shared between sponsors and children. SAMABHAVANA SOCIETY is committed to the protection of all its children and sponsors.

E-mail between Children and Sponsors

Sponsors and children may not communicate directly with each other via e-mail. All e-mail communication must be sent through the appropriate Web-enabled process. SAMABHAVANA SOCIETY procedures provide certain edits and processes to ensure that the protection of the child and sponsor is considered to the highest extent possible.

These edits and processes may include, but not be limited to, validation of the sponsor/child link, text scans for inappropriate words and/or phrases, and a verification that the sponsor's name does not appear on a Sex Offender Registry.

A failure of the sponsor's or child's e-mail to meet the established protection edits will result in the e-mail being rejected and sent to/handled by the International Office Donor Services group, an International Affiliate/ChildFund Member and/or the Country Office Sponsor Relations group.

Acceptable e-mails from sponsors will be delivered to the intended child through a printed copy. However, the sponsor's e-mail address will be rendered non-readable prior to delivery to the child. Acceptable e-mails from children will be delivered to intended sponsors in standard e-mail format. The actual sending e-mail address will not be shown when the e-mail is delivered.

Written Correspondence between Children and Sponsors

Occasionally, sponsors may request that correspondence exchange continue once the sponsorship relationship has ended. Christian Children's Fund will not facilitate or promote the continued correspondence exchange.

In rare circumstances, when a long-term sponsor requests continuing correspondence with a child with whom s/he had a particularly close relationship and who is no longer enrolled in a SAMABHAVANA SOCIETY affiliated entity, the Country Office may approve the request. Sponsor requests that originate in the International Office or an International Affiliate/ChildFund Member will be forwarded to the Country Office for request approval/denial. If the request is approved, the Country Office must make it clear to the former sponsor that it will not go to extreme measures to find the child, especially if the child/family has moved from the affiliated entity program area. Sponsor and child letters and e-mail will continue to be translated and edited by the Country Office for appropriateness.

Requests for continued correspondence once a sponsorship has ended that are initiated by the child or the child's family will not be considered/approved by the Country Office, the International Office or an International Affiliate/ChildFund Member.

2.4.2 Visits

Sponsor Visits to Children and SAMABHAVANA SOCIETY Offices

Sponsors are encouraged to develop a relationship with his/her child. Relationship building includes letter and e-mail correspondence as well as visits to the child's country. The sponsor is informed that if s/he wishes to visit the child, that s/he must telephone the International Office Donor Services department at least four months prior to the actual planned visit.

During the phone conversation, the Donor Services representative will review the brochure "Planning a Visit to Your Sponsored Child" with the sponsor and obtain basic information about the trip. The sponsor will be advised that s/he must contact the Country Office immediately to finalize plans for the visit. The sponsor will be provided with information regarding the visit.

The agency reserves the right to screen sponsors (including criminal background checks) prior to field visits. If the agency deems a criminal background check necessary, the agency shall require permission from the sponsor to do a criminal background check prior to a field visit where permitted by local law. At the time of sponsorship, sponsors should be advised that the organization's policy prohibits unannounced visits. Prior to a visit, sponsors will be asked to acknowledge in writing or by phone that they have received and understand the visit policy.

When the sponsor first contacts SAMABHAVANA SOCIETY staff in the country, the SAMABHAVANA SOCIETY staff will review the information in the "Planning a Visit to Your Sponsored Child" brochure with the sponsor. The sponsor must agree to all terms in the brochure before the actual person-to-person visit begins. The Country Office staff must ensure that translation and transportation are available to the sponsor. A sponsor should be advised that reimbursement of expenses (transportation, etc.) incurred by the office during the visit is anticipated and appreciated.

All sponsor and child visits are to be carefully supervised by SAMABHAVANA SOCIETY Country Office staff. When and if approved by the Country Office, a SAMABHAVANA SOCIETY affiliated entity sponsorship program representative may substitute the Country Office staff in supervising the visit if and only if that person is trained in, is in full compliance with and has signed off on SAMABHAVANA SOCIETY's Child Protection Policy.

These visits should normally last no longer than one day, allowing time for the sponsor, child, and family members to spend time together, under the supervision of SAMABHAVANA SOCIETY staff or authorized affiliated representatives. When appropriate, the Country Office may extend the visit into a second day, but not longer, because of the monitoring burden that's placed on SAMABHAVANA SOCIETY staff/or affiliated entity staff.

Under no circumstances will staff leave the child and parent/guardian alone with the sponsor at any time during the visit. Meetings will preferably occur in public places – Country Office, affiliated entity office, school, restaurants, parks, playgrounds, etc.

SAMABHAVANA SOCIETY only permits visits to a child's home under exceptional circumstances (when requested by the sponsor and conditionally approved by the International Office). The International Office will only conditionally approve the request upon fulfillment of the normal sponsor visit protocols and if there is a special reason for the sponsor to visit the child's home, such as if the sponsor provided extra funding to construct the child's home.

In these cases the Country Office has the responsibility and the right to agree or disagree with the conditionally approved exception. If the Country Office disagrees with the exception, the visit to the child's home is not allowed. If the Country Office agrees with the exception, it has the responsibility to ensure that the visit is conducted under strict supervision and that the family and affiliate staff have received clear instructions that the unannounced return of the sponsor to the affiliated community or child's home must be immediately reported to the Country Office. As with all visits, the sponsor will be clearly informed by the International Office and the Country Office that his/her presence in the affiliated community (and in this case the return to a child's home), unaccompanied by the authorized SAMABHAVANA SOCIETY or affiliate representative, is prohibited. Also, the sponsor may not spend the night at the child's home.

Actual or suspected cases of any abuse or inappropriate behavior by a visiting sponsor are to be reported immediately to in-country agency management. Appropriate action must be taken regarding the donor or sponsor, within the local context.

The affiliated sponsorship program must provide the SAMABHAVANA SOCIETY Country Office with a written report of every sponsor visit. A copy of the sponsor visit report should also be kept on file at the affiliated sponsorship program office.

Children Visits to the Sponsor's Residence

Children visiting sponsors in the sponsor's country/residence or any location outside of the child's local residence is strictly prohibited. In addition to the liability and risk of abuse, the child may be negatively impacted by the culture and material wealth of an environment outside his/her own experience.

The only exception to this policy is if the child is facing a life-threatening medical situation which cannot be treated in the child's own country. The emergency treatment available in another country may be arranged by SAMABHAVANA SOCIETY staff. The President of SAMABHAVANA SOCIETY must sign a release form to authorize the trip PRIOR to its actual occurrence.

2.4.3 Systems and Administration

Screening Sponsorships

Whenever a pre-sponsor is found to have a corrections facility address or is found to be known convict, the sponsorship will be denied. Additionally, the pre-sponsor's name will be marked in our database as undesirable to preclude him/her from sponsoring another child while incarcerated. Though donations will be accepted, sponsorship is not an option.

Marketing and Printed Materials

Paper and electronic information about enrolled children and families will be kept secured at all times. Information is limited to SAMABHAVANA SOCIETY individuals who require access to the information as part of their responsibilities (sponsorship, program, etc.) in the agency. When information must be purged/destroyed, it is done so in a secure manner.

Communications about children must use pictures and language that are decent and respectful.

A child's personal and physical information that could be used to identify the specific location of a child within a country is not used by the agency on web sites or other mass communications.

Sponsors are advised that child-specific information via the WEB is provided as a service and is not to be downloaded or redistributed to another site.

SAMABHAVANA SOCIETY adheres to the “Code of Fund-Raising Ethics for Voluntary Agencies” that was adopted in 1976. In part, the Code promises that agencies maintain the confidentiality of donors, be truthful and accurate in all appeals, demonstrate respect for people assisted and focus always on the welfare of children assisted.

2.5 Regional Training and Support

Regional Representatives will ensure that all offices within their respective region have a copy of the SAMABHAVANA SOCIETY Child Protection Policy. Country Office directors will ensure that office staff and affiliated staff adhere to the policies and guidelines contained in the document.

In situations where local law is in conflict with the policy, the National Director is responsible for bringing the situation to the Regional Representative’s attention and for ensuring that the exception is appropriately documented in the policy manual.

Offices may develop their own written procedures to ensure compliance with the Child Protection Policy. Offices within a region will work together to develop, document and implement regional, office staff and affiliated staff training related to the Child Protection Policy.

2.6 Allegation and Incident Management

Effective child protection policies have two parts. First, there must be an aggressive system of prevention through clear-cut expectations, effective hiring and training, top-level awareness, and good programming and sponsorship. Second, there must be a supportive system for allegation and incident management.

Development of an effective allegation and incident management system is critical to SAMABHAVANA SOCIETY’s efforts to protect children from abuse and ensure due process for employees cited in an allegation. The management system provides for reporting, documenting, investigating and actions-taken as a result of an allegation and/or determination that child abuse has occurred.

Child abuse is “our worse fears realized.” It is difficult to accept that child abuse may have occurred. There is denial. There is fear. All of these factors can lead to a potential of under-reporting which in turn leads to continued abuse. Therefore, the management system must encourage reporting by instilling trust in the involved parties.

2.6.1 Reporting

All SAMABHAVANA SOCIETY staff are required to report immediately to the designated Point Persons with any suspicions of violations of the Code of Conduct or child abuse. If a person knowingly chooses not to report an incident, then s/he will be removed from any association with SAMABHAVANA SOCIETY.

It is imperative that children and parents understand their responsibilities to report any concerns they may have regarding the safety of children.

Regardless of who is reporting an allegation (staff member, child, parent, etc.), the allegation must be reported directly to a SAMABHAVANA SOCIETY Point Person, who should provide details about what happened, including the date, location, and the name of the witness and transmit the report to the National Director and the Regional Representative within twenty-four hours. Procedures for reporting suspected cases of child abuse to external agencies are to follow local and national laws.

Confidentiality

It is essential to maintain the trust of the person reporting possible abuse. SAMABHAVANA SOCIETY staff must protect the gathered information with the greatest care. It may be that the person reporting the possible abuse does not want the information shared with others. All information gathered and developed is held in the strictest confidence and will be disclosed only on a need-to-know basis in order to report, investigate and resolve the matter.

In some cases, SAMABHAVANA SOCIETY may act against the wishes of the reporter in the best interests of the child and other children. This can be a very difficult situation and must be handled with the utmost care by

SAMABHAVANA SOCIETY. It must be made clear to all concerned that information of this nature cannot be kept wholly confidential. Resolution requires sharing with the appropriate people in a confidential manner.

2.6.2 Investigation and Disposition of Incident

The National Director is to follow established local procedures once an allegation has been reported and to insure that a confidential, thorough, timely and impartial investigation and resolution are performed. Procedural actions by the National Director include, but are not limited to: acting immediately if there is risk to the child, performing an internal investigation (which may include interviews of witnesses and others), collecting factual information, gathering documentation, informing the Regional Representative and the International Office or the International Affiliate/ChildFund Member if applicable, and reporting the incident to external authorities as required by local laws.

A SAMABHAVANA SOCIETY employee who has been brought under investigation by the agency or by official law enforcement authorities for the abuse of a child will be temporarily suspended or have no access to children during the course of the investigation. The employee will be informed that allegations have been made against him/her and given an opportunity to respond.

The individual alleged to have violated this policy will have the opportunity to present his or her view of the events in question before any determination of guilt or innocence has been reached.

The investigation team will consider the incident top priority until the incident is closed. The team will develop a detailed written investigation plan based on established local procedures. Once the investigation is completed, a full written report (findings, recommended actions) will be shared with/approved by the National Director and Regional Representative and International Office or International Affiliate/ChildFund Member (if appropriate). The regional representative will review approved report with appropriate legal counsel and the President of SAMABHAVANA SOCIETY before any actions are taken.

Following the completion of the investigation, both the person(s) bringing the allegation and the person(s) alleged of a violation will be informed of the results of the investigation.

Christian Children's Fund reserves the right, in the event an employee is discharged for proven sexual abuse, to disclose such information if requested by a prospective employer. Disclosures shall be made in accordance with applicable local law and/or customs.

SAMABHAVANA SOCIETY will not tolerate any form of coercion, intimidation, reprisal or retaliation against any employee who makes a report regarding possible violations of the Child Protection Policy or any person who provides information or assistance in an investigation.

The National Director is responsible for implementing all recommended/approved actions.