

Safeguarding Policy

Statement

International Child Development Initiatives (ICDI) is committed to the human dignity of all people and thus does not tolerate any form of exploitation, abuse or harassment, whether verbal, physical or sexual in nature, anywhere in our organization or in our work.

Scope

This policy applies to all ICDI employees and partners:

- **Employees** refers to all full time and part time staffs, contract or project-based employees, board members, volunteers and interns.
- **Partners** refers to partner organizations and their employees, consultants, independent contractors, investors and supporters.

Definitions

Safeguarding is the set of measures designed to prevent and address behavior that threatens the safety, well-being and human rights of our community partners or colleagues.

Harassment and abuse refer to any action that intentionally harms or injures another person. It refers to a verbal, visual, spiritual, emotional or physical conduct of a derogatory nature based on a person's race, color, religion, age, condition, national origin or other such characteristics.

Unequal Power gives rise to the possibility of such misconduct. An unequal power relationship is the basic component of a power structure. The person with superior power, either due to trust or to technology access or superior knowledge, does not necessarily have superior ethical judgement, just because they are trusted, technologically enabled, or better educated. The nature of NGO work creates an inherently unequal power dynamic—between those employed by or working with the NGO (which has resources and

status), and the members of the communities where we work (who frequently have fewer resources and/or status).

Our safeguarding policy will look at the issues from different angles, allowing us to limit the risks and to create a safe environment for all

Approach

1. Prevention

Policies: ICDI will develop, implement, and maintain strict policies that will provide structure and guidance for ICDI all employees and partners.

Recruitment: Through a strict recruitment process, we will strive to identify potential offenders or deter them to join ICDI.

Training: We will train employees and partners about our policies and processes, helping them to adopt adequate behaviors and identifying problematic behaviors with others.

Continuous review and update: Policies and practices will be regularly reviewed and evaluated, and changes will be made to improve our global safeguarding policy.

2. Reporting

Internal feedback system and whistleblower: We encourage an open-door policy, enforce a non-retaliation policy and have identified a person who is available to receive feedback and complaints (and act upon these without endangering the person(s) submitting these).

Beneficiaries' participation: Communities in which ICDI or its partner organizations work, will be made aware of our policies and will know their rights and how to report potential abuses and abusers to the largest extent possible. In practice this means that we will ask from our partner organizations to be transparent about complaints and safeguarding policies, via their websites or otherwise.

3. Investigation, Discipline & Sanctions

All instances of suspected exploitation, abuse and harassment will be investigated, and disciplinary action will be taken when needed.

1. Prevention

Policies

ICDI enforces the following policies:

Code of Conduct (see Appendix)

ICDI's Code of Conduct is a set of guiding standards and principles that all representatives of ICDI adhere to in practice and in spirit in all their decisions, procedures, actions and interactions.

All employees are required to familiarize themselves with this Code of Conduct upon joining ICDI and annually thereafter. Partners are required to sign the Code prior to being contracted by us.

Child Protection (see Appendix)

ICDI will not tolerate any physical, sexual or verbal abuse against a child or youth anywhere in our work. Children and youth as used in this policy is understood to be any person under 18 years of age, or older if determined by law.

All employees are required to familiarize themselves with this Code of Conduct upon joining ICDI and annually thereafter. Partners are required to sign the Code prior to being contracted by us.

Recruitment

Advertisement

The job description and advertisement on websites and in newspaper or any other support will include a mention referring to our policies and that all employees are required to adhere to it.

Interview

Appropriate questions are asked during the interviews, to evaluate candidate's commitment to safeguarding.

Reference check

At least three reference checks will be done for any prospective employee (including volunteers and interns).

Background check

For any employee that will work directly with children, and when legally authorized in the country of assignment, a criminal background check that specifically checks for prior incidents of child-related misconduct of any kind, is conducted. For staff employed at ICDI office in NL a Certificate of Conduct is mandatory (https://www.mijnverklaring.nl/?gclid=CjwKCAiAis3vBRBdEiwAHXB29Gj6k9Pb-phA3iX0w5PFg7q-yp2egqDNI6sghljSFTjde9VclL2GZRoC3mgQAvD_BwE).

Awareness Raising

Anti-harassment Meeting

Each employee will participate in an anti-harassment team discussion that will be conducted at least once per year.

Awareness

ICDI management will ensure that all staff and others working with ICDI are aware of the problem of child abuse, and the risks to children, and on (sexual) harassment in general.

Continuous review and update

Continuous review

Every reported incident will trigger a review of the policy to determine if and which changes in our policies and practices could avoid the same situation to repeat itself.

New policies, white papers, training and recommendations from peer organizations or donors may be considered to improve the ICDI's safeguarding policy.

2. Reporting

Internal feedback system and whistleblower

It is mandatory for all ICDI employees to immediately report any witnessed, suspected or alleged incidents of exploitation, abuse or harassment.

There is often a deeply entrenched culture of silence around exploitation, abuse and harassment. Thus it is incumbent upon all ICDI team to create reporting mechanisms that make it *easy and safe* for victims and observers to report any such misconduct.

In the ICDI office clear information will be posted with instructions for how to report any witnessed, suspected or alleged misconduct (and from our partner organizations we will expect the same). This will include the email and or/phone number of relevant staff, such as the Integrity Officer(s). In addition, each program site should have a letterbox for anonymous reports.

To facilitate the reporting internal feedback, an Integrity Officer(s) is identified in ICDI.

The Integrity Officer(s) is tasked with the following key responsibilities:

- Contribute to the design and implementation of an updated integrity infrastructure, and systematically review/update and disseminate the code of conduct and related set of policies to all staff to ensure that is current and widely used
- Monitor and implement of ethical policies and procedures
- Provide guidance to the Management on how to conduct Integrity Risk Assessments
- Develop and conduct awareness programs on integrity and ethics to all ICDI staff and relevant partners
- Ensure that reporting mechanisms are in place, both in the workplace and in communities;
- Conduct the initial fact gathering of any issues reported; and
- Inform the Director, Human Resources, or any concern, incident or information received and coordinate the approach to solve the issue.
- Organize at least 4 meetings a year with the whole team of ICDI in which case studies on integrity issues are shared and discussed
- Conduct or supervise fact-finding and/or investigations and provide advice on any aftercare within a team, following an investigation
- Develop and deliver trainings to staff and management on moral judgment/integrity together with relevant colleagues, and institutionalize the practice of regular moral deliberations
- Develop and conduct annual/multi-year integrity planning, monitoring and reporting mechanisms that meet the vision and ambition of the organization
- Produce an anonymous annual review on both the preventative and governing components of the compliance practice, and on moral dilemmas and the moral learning process
- Act as champion and central point of contact for questions from staff and management about prevention mechanisms, the code of conduct and related set of policies as well as on rules and violations and moral dilemmas
- Inform partner organizations about our policies and ensure that they understand and adhere to our code of conduct;

We encourage an open-door policy, enforce a non-retaliation policy and have identified a person who is available to receive feedback and complaints (and act upon these without endangering the person(s) submitting these).

So called “whistleblowers” (which basically means anybody who wishes to raise a concern or file a complaint about ICDI’s staff conduct) can turn to Dick Vlottes, who acts voluntarily as an independent trusted person for the organization (dickvlottes@live.nl). It is important to emphasize his independency: he holds no position within ICDI and his foremost duty is to ensure that any complaint or concern is taken seriously, and that this has no personal or professional repercussions for the person reporting the matter. If deemed necessary, Dick will invoke the support of the Netherlands whistleblower agency <https://www.huisvoorklokkenluiders.nl/>.

3. Investigation

Reporting

All instances of suspected exploitation, abuse and harassment must be investigated. This includes rumors and gossip as well as formal reports. The Director is ultimately responsible for the investigation, unless there is any allegation that the Director is involved in the incident. If the Director is suspected, the HR Manager is responsible for the investigation. If the HR Manager is alleged to be involved in the incident, then the matter is referred to the Board of Directors.

Depending on the seriousness and complexity of the allegation, the investigation may be handled internally by the Integrity Officer(s) or referred to an outside expert. If the person responsible for the investigation (the Investigator) believes an outside expert is required, they will consult with the Management to determine the appropriate course of action.

Processes

Process for an investigation will vary from case to case. The investigations may include the following steps:

- The initial response to any allegation is to take the alleged report seriously;
- When a complaint is filled through one of the possible channels the (one of) integrity officers will decide who is best positioned to become the Investigator for the allegations.
- Upon receipt of a report the Investigator will review the allegations and take interim actions (e.g., instructing the respondent to refrain from communications

with the complainant), as appropriate. If a report is verbal, the Investigator may encourage the individual to complete the “Report Form” in writing (see Appendix). If he or she refuses, the Investigator prepares a Report Form based on the verbal reporting;

- It is key to take all reasonable precautions to ensure protection of the alleged victim; the Integrity Officer ensures that care and protection are given when needed, including but not limited to removing the alleged victim and / or perpetrator from the situation, and offering access to professional psychological support;
- The Investigator may request and review relevant documents including electronic communications and take steps to obtain and preserve those documents;
- The Investigator may interview parties involved, including relevant witnesses;
- The Investigator may create a written documentation (see Appendix for Incident Report) of the investigation (such as a letter, memo or email). And;
- When appropriate the Investigator may inform the individual who reported of the right to file a report or charge externally.

Disciplinary Action and Sanctions

If, after an investigation, Management, in consultation with Human Resources, concludes that ICDI policy was violated in any way, it will take all appropriate action.

A determination that misconduct has occurred does not necessarily mean that a sanction must be imposed. A decision can be taken that other remedial action may be appropriate.

Disciplinary action will be taken against any Employee or Partner found to:

- Have engaged in prohibited discrimination, harassment, or any other conduct that has violated ICDI policies;
- Have contributed to the creation or continuation of a hostile work environment may;
- Have failed to report an exploitation, abuse or harassment concern;
- Have obstructed an internal investigation;

Disciplinary action may include, but is not limited to:

- Termination of all relations including employment, contractual or partnership agreements;
- Reporting to authorities if it is suspected that a crime has been committed;
- reduction in salary scale
- re-assignment of duties
- reduction in salary
- deductions from salary, by way of fine
- a reprimand

In addition to any disciplinary action taken by ICDI, the employee or partner may be held personally liable for monetary damages if a civil action is filed against him or her.

Sanction will be decided by the Director or the Board and will be based on principles of predictability, fairness, proportionality, reducing risk, and encouraging improved performance.

Confidentiality

ICDI will maintain the confidentiality of the complainant, the accused, and any witnesses, and each of their statements and records, to the fullest extent practicable and appropriate under the circumstances. ICDI cannot promise absolute confidentiality but will conduct the investigation on a need-to-know basis.

Communication

The director must be informed of all incident, alleged or not, the result of the investigation, and what corrective action was taken, if any.

In turn, she will inform the Partners in the programme country where an incident is reported. If needed, the Director will inform the donor and or beneficiaries.

ANNEX

REPORT

Type of Incident: Fraud/Corruption/Sexual Exploitation/Abuse/Other Misconduct
Location: Country and specific office or program site
Date of Report:
Submitted to:

BASIC INFORMATION

If any question does not apply, say "N/A". If you do not know, say "Don't Know". Do not leave any area blank. Be specific!

INCIDENT	Who (person involved / alleged perpetrator)	
	Did What	
	Where	
	How	
	When	
DISCOVERY	Who	If person requests whistleblower protection, say "Anonymous"
	Discovered What	
	How	
	When	
	Reported it to Whom on what Date(s)	

ADDITIONAL INFORMATION

Fill in any information that is currently known. This section can be updated over time.

CORRECTION	Actions with Community Partners	List, by date
	Actions with THP Staff or Volunteers	“ “
	Actions to Recover Funds	“ “
	Reporting to Authorities	“ “
	Legal Action	“ “
	Next Steps (Planned or Recommended)	
LEARNING	Possible Reasons Why This Happened	
	How It Went Undetected	
	What Was the Impact	
	Recommended Changes	