

ADRA Norway, Child Protection Policy

I. Preamble

ADRA Norway condemns all abuse against children. ADRA Norway is committed to helping all people in poverty and distress, and consequently is committed to protecting children associated with ADRA Norway's programs and ensuring that they become empowered people who are able to develop their full potential. Therefore, ADRA Norway has a policy of zero tolerance of child abuse.

ADRA Norway adheres to statutory laws in Norway and foreign countries in addition to international conventions regarding child abuse and exploitation. ADRA recognizes that some development countries have weak legal protection of children or are lacking a legal mandate to uphold children's rights. It is therefore vital that ADRA staff and people affiliated with ADRA projects are aware of protection issues and fully implement this Child Protection policy. It is the responsibility of all staff to identify, manage and minimize the risk of harm to children by promoting good practices and reporting suspicions, as outlined in this policy. When a concern is reported ADRA Norway will follow internal procedures and notify relevant law enforcement agencies as appropriate.

II. Scope

ADRA Norway's Child Protection Policy aims to prevent **all** forms of abuse and maltreatment against **all** children in **all** ADRA Norway's interventions and supporting activities.

This Child Protection policy is a statement of intent that demonstrates ADRA Norway's zero-tolerance for child abuse and ADRA's commitment to safeguard children from harm. The overall goal is to create and maintain child-safe environments in the delivery of ADRA Norway's local and international programs. The policy addresses both issues related to the prevention of abuse and actions that should be taken if and when abuse takes place in an ADRA-supported project. The specific guidelines for mitigating abuse are applicable to all contexts ADRA Norway takes part in, regardless of funding source, geographical focus, cultural context, and regardless of whether children are the specific focus.

This policy applies to all ADRA Norway personnel, contractors, sub-contractors, all in-country partner organizations, interns and volunteers working with ADRA Norway or with a partner organization, when they are operating as part of an ADRA-supported project (hereafter referred to as 'representatives'). This includes people that are both in direct and indirect contact with children.

III. Definitions

- a. 'Child' or 'minor' is any person who is less than 18 years old.
- b. 'Representatives' includes all people who are working under contract on a paid or voluntary basis for ADRA Norway or its partner organisations, or representing ADRA Norway as a part of an official project or program be it local or international.

- c. 'Child protection' is understood as the actions taken by individuals, communities and stakeholders in the organisation to safeguard children whom they come into contact with from all types of abuse and exploitation.
- d. 'Direct contact with children' means being in the physical presence of a child or children, whether contact is occasional or regular, short or long term, and whether contact applies to children in Norway or in project countries.
- e. 'Indirect contact with children' entails having access to information on children, such as children's names, locations (addresses of individuals or projects), photographs, interviews etc.

IV. Principles

ADRA Norway is committed to upholding and promoting children's rights, as laid down in local, national and international laws. ADRA Norway will work towards what is best for the child, protecting children from work or activities that are dangerous or might harm their health, education or development. Furthermore, ADRA Norway respect, value and understand the integrity of children as individuals within their own culture, religion and ethnicity. Children must be taken seriously and encouraged to meet their full potential through participation in decision-making that affects their lives. Above all, nothing must interfere with children's right to play and develop according to their age. Whenever a conflict of interest arises, the needs of the child should always come first.

It is the responsibility of each person involved with ADRA Norway projects and programmes to promote and implement these principles, be they ADRA Norway staff, partner organisations, contractors, sub-contractors, volunteers/interns or visitors. Breaches of these principles will be grounds for the immediate termination of employment contract, MOUs, project funding, visit or volunteer/intern assignment. Legal action will be taken as necessary.

DO NOT:

- Condone, or participate in, behaviour with children which is illegal, unsafe and/or abusive. This includes **traditional harmful practices** (eg. female genital mutilation, witchcraft, early marriage etc.), child prostitution, child trafficking and alcohol and drug abuse.
- Discriminate against or favour particular child(ren) to the exclusion of others.
- Place yourself in a compromising or **vulnerable position** when meeting with children (e.g. being alone with a child in any circumstances that might potentially be questioned by others).*
- **Sleep** in the same bed as a child. Furthermore, avoid staying overnight in the same room as one or more children without other adults being present, whether in staff accommodation or elsewhere while on duty. *
- Hit or use other forms of **physical violence** towards a child, also in a school setting.
- **Touch** children in an inappropriate or culturally insensitive way.
- Engage in or suggest **sexual activities** with a child.
- Develop relationships with children that could in any way be deemed **exploitative or abusive**.
- Use **language**, make suggestions or offer advice which is inappropriate, offensive or abusive.
- Let a **child's work** interfere with his/her regular education or schooling and recreational activities, or place them at risk of injury because of their work.
- Discipline a child by **withholding** attention/care, food, shelter, education or any other means/person that make them feel safe.
- Do things of a **personal nature** for a child that they can do for themselves, i.e. dressing, toileting, bathing etc.
- Use **cultural** and/or **religious** values/practices as an excuse for harming a child.
- Shame, humiliate, belittle, threaten or degrade children, or otherwise perpetrate any form of **emotional abuse**.
- Take, download, use or distribute photos of children of a **pornographic** nature.
- **Expose** children to inappropriate or harmful material such as videos, pornographic literature and harmful internet sites.
- Be under the influence of **alcohol or drugs** prior to or while taking responsibility for a child.
- Provide **shelter for minors** in your home unless otherwise agreed upon with the parent/guardian of the child.

* Does not include children where the ADRA representative is the parent or legal guardian.

DO:

- Respect the **national laws** against exploitation and abuse of children, and promote local child protection laws and norms.
- Respect **cultural norms** and dress appropriately to avoid misunderstandings.
- Be **inclusive** and involve all children without selection or exclusion on the basis of gender, disability, ethnicity, religion or any other status.
- Acknowledge the importance of **play time** as means of development.
- As far as possible, let children **participate** in decision-making regarding their own lives.
- **Involve children** in the making of rules for good and bad behaviour, as well as appropriate actions in case of bad behaviour.
- Promote **safe environments** in which children are encouraged to share their concerns or ask questions.
- **Educate** children about their rights. As far as possible, education on child rights should also be given to children`s parents, community members and school teachers.
- Educate children about what is considered **unacceptable behaviour** towards them and about what to do if he/she is exposed to such behaviour.
- Be aware of your responsibility as an adult to assess what is **suitable and unsuitable** for children to see, witness or hear.
- Unless it is deemed absolutely necessary for the safety of the child to have the door closed, leave the **door open** when being in a room alone with a child. *
- Where possible and practical, adhere to the **two adult rule** (have two adults present during activities involving children). *
- Respect a child`s **faith**.
- Keep sensitive personal information about a child **confidential**.
- Develop special measures/supervision to protect younger and especially vulnerable children from **peer and adult abuse**.
- Avoid **high-risk peer situations** (e.g. unsupervised mixing of older and younger children, which may lead to abuse and discrimination against minors).
- As a general rule, limit contact with children to regular **working hours**. *

* Does not include children where the ADRA representative is the parent or legal guardian.

V. Confidentiality

All incidents and alleged incidents of child abuse are handled with extreme sensitivity and confidentiality. All concerns that arise are always directed through the formal procedure outlined in the Child Protection Policy, and the information regarding the case will be handled with extreme care in the best interest of the involved children and adults. All documentation of any allegations made, either electronic or paper, is to be kept in a secure place at all times.

VI. Prevention Strategies

The foundation of any Child Protection Policy is prevention. ADRA Norway mandates a range of processes designed to minimise the potential for harm to children.

a. Employees

Background Check:

During the interview process for positions involving direct contact with children applicants should provide a police check report as far as it is possible to acquire. ADRA Norway shall not hire anyone with prior conviction for child abuse, paedophilia or related offences. Applicants will be asked specific child-protection questions during their interview, and should provide three satisfactory, independent referees who will be asked about the candidate's experience in working with children and to disclose any concerns that they may have about the applicant's suitability.

Due to the variety of activities that ADRA Norway representatives engage in, and the inherent variations in risk to children associated with those activities, an assessment will be done to determine the level of screening required. This assessment will use the assessment tool in appendix 2a, and it will be documented during the recruitment or engagement processes with records kept in the employee, contractor or volunteer records.

Child Protection Officer

In addition to doing a background check of all ADRA Norway employees and ADRA Representatives, ADRA Norway has a designated Child Protection Officer (CPO) to be responsible for child protection issues within the organisation. Duties may include orientation and training on child protection issues and the responsibility for the follow up and investigation of child protection concerns and complaints. This means that the CPO should receive training in Child Protection issues, and should make responsibilities and policies clear to all ADRA Representatives.

b. Visitors

All visitors to ADRA Norway's projects should be advised on appropriate conduct that should reflect national and local sensitivities. This includes being advised on how to avoid differential treatment and discrimination of children through e.g. the giving of gifts and/or money during project visits. It is the responsibility of all ADRA staff in addition to the person in charge of the visit to ensure that the visitors know the contents of ADRA Norway's Child Protection Policy and that they abide by it throughout the visit.

ADRA Norway reserves the right to terminate a visit if a visitor acts inappropriately during the visit and take legal action as necessary.

c. The use of policy documents

The Child Protection Policy is designed primarily to protect children; however it also serves to protect representatives from false accusations; and the name and reputation of ADRA Norway. All ADRA staff, volunteers, interns, and individual contractors must comply with the Child Protection Principles, which sets standards for personal behaviour. ADRA Norway expect all ADRA Representatives to use

common sense and avoid actions or behaviour that could be construed as child exploitation and/or abuse.

All ADRA Norway staff must sign a declaration stating they have read and will comply with the Child Protection Policy. The policy will be disseminated to all relevant partners, and will be translated to the local language if necessary. ADRA Norway still expect all partners that have contact with children to have their own Child Protection Policy in place and implemented. This expectation is specified in all partnership agreements and project agreements.

ADRA Norway's Child Protection Policy will undergo regular reviews and be updated at least every 5 years.

d. Training

In addition to disseminating the Child Protection Policy ADRA Norway will provide training sessions for ADRA staff, partners, visitors, volunteers and interns. ADRA Norway's CPO has the responsibility to arrange and follow up such trainings. The designated CPO will also receive training on Child Protection issues to ensure his/hers competency in dealing with such issues.

e. Risk analysis

ADRA Norway staff will identify child protection risks through conducting an initial risk assessment according to appendix 2a and appendix 2b. This will identify strategies to manage those risks, and provide guidance for monitoring, evaluating and updating risks and strategies throughout the life cycle of the project. This will be an embedded part of the overall sensitivity assessment done for each project.

f. Special concerns for media and communication

With regard to visuals and communications, this policy primarily aims to protect children portrayed in images against harm; but also serves a secondary purpose: to protect children who read or access ADRA Norway's visuals against seeing harmful images and headlines. Appendix 5 outlines recommendations for how to protect children in images that are considered being used for communication purposes, based on the perceived level of risk for the relevant child.

Using ADRA Norway's systems to access child exploitation material or to engage in online grooming is unacceptable and is dealt with promptly, and reported to relevant law enforcement agencies as appropriate. All ADRA Representatives are obliged to inform the Child Protection Officer about any concern or suspicion arising about data, information or visual images that can be interpreted as being potentially harmful to a child or children.

The following precautions should be taken to ensure that children portrayed in images are protected against harm:

- The over-riding principle of all communication about children is the respect for the **absolute dignity and integrity** of the child, which should not be compromised in order to gain empathy.
- All capturing and reproducing of personal images should assess and endeavour to comply with **local traditions**, restrictions or requirements.
- If there is a **risk of harm** to the child or the dignity of the child, the eyes of the child or other visuals should be distorted in pictures where the face can be used to identify him/her. If necessary, use pseudonyms.
- Photos of children that can be identified and that will be published on the website or in any of ADRA Norway's publications should be taken with the **permission** of the parents or guardian of the child.
- Where possible, informed, verbal **consent** from the child and parent/guardian of the child should be solicited prior to their visuals or personal information being used.
- Communication about children should use pictures that are **decent and respectful**, not presenting them as victims. Children should be adequately clothed and poses that could be interpreted as sexually suggestive must be avoided.
- **Language** that implies a relationship of power, or that is discriminatory and/or degrading must be avoided.
- Images and texts of children should **not be manipulated or sensationalised**. Images should ensure honest representations of the context and the facts.
- Images of children should be **stored in a secure place**, and efforts should be made to ensure that donors, partners and media who request the use ADRA Norway's resources such as videos or photographs use such materials in an appropriate way.

VII. Addressing Abuse

The development, implementation and continual monitoring of an effective allegation and incident management system is essential to ADRA Norway's efforts to protect children from all forms of abuse and to ensure due proofs for any of ADRA Norway's representatives involved in an allegation.

a. Complaint Mechanism

1. Notify the relevant authority in ADRA Norway:

All individuals outlined in the scope are required to report immediately to the ADRA Norway Child Protection Officer if they have reasonable suspicions of child abuse occurring or being likely to occur, including the inappropriate use of printed materials. If there are absolute indisputable evidence that a crime is being committed they should report directly to local law enforcement, and contact the CPO afterwards. If a person knowingly chooses not to report an incident, then they will be subjected to disciplinary action including possible termination of employment.

In the case that a child discloses abuse, the person receiving the information shall tell the child that (s)he is not to blame for the abuse that occurred, and appraise the child for reporting the matter.

The complaint should be reported directly to ADRA Norway's CPO, but if the CPO is implicated in the concern in any way the complaint should be directed to the Country Director. If the Country Director is implicated or involved in any way the complaint should be reported to the Board Chair of ADRA Norway. Information about how to contact these individuals can be found at www.adranorge.no.

A complaint can also be reported anonymously by filling out an online complaint form at www.adranorge.no. All complaints will be dealt with in full confidentiality and with utmost discretion.

2. Written record of the complaint:

The complaint and investigation process should be documented in writing, and stored in a safe location. Verbal complaints by stakeholders must be documented by staff and submitted in written form if the stakeholder is unable or unwilling to submit personally. Regardless of the decision made, the process must be documented and filed, with all printed and electronic matter being kept in a secure and confidential place at all times.

3. Ensure child safety immediately:

The ADRA Norway Child Protection Officer, or the relevant person receiving the complaint, is responsible for taking immediate steps to secure the safety of the child or children concerned. If the concern is about ongoing harmful behaviour or there is a chance of harm being inflicted in the future, the suspected person shall be suspended while further investigation takes place. The well-being of the child or children shall always be given priority.

Where appropriate and where resources are available, ADRA Norway should do its utmost to offer services to traumatised children and their families, in order to promote quick recovery. This may include, but is not limited to, medical, psychological and advocacy support services.

4. Conduct an internal investigation:

The CPO, or the relevant person receiving the complaint, must initiate an internal investigation of the allegations. He or she will consult with the relevant staff, other relevant ADRA representatives and if possible talk to the offended child or its parents/guardians. The aim of the investigation is to determine whether the ADRA Norway Child Protection Policy or the Code of Conduct has been breached and whether a referral of the information to local law enforcement authorities is necessary. The internal investigation must be

conducted in a timely manner and may involve external legal, mediation or expert advice if required.

5. Keep the child and/or its parents/guardians informed:

The child should be kept informed about the reporting process and the outcome of the investigation based on the child's maturity and need at least from the age of seven. From the age of twelve the child shall be kept comprehensively oriented. If the child is under 16 years old, his or her parents/guardians shall also be kept informed about the reporting process and the outcome of the investigation. The Child Protection Officer may still withhold information if one or more of the child's parents/guardians and/or close relatives are implicated in the complaint and/or if the Child Protection Officer considers that sharing this information may put the child at risk.

6. Notify local authorities if a crime has been committed:

If the investigation reveals that a crime has been committed the incident will be reported to the local law enforcement authority immediately. ADRA Norway will comply with relevant local statutes and protocols, and will cooperate with the Police.

7. Notify the Board:

The relevant person in charge of the investigation shall report on the complaint, the investigation process and the outcome to the ADRA Norway Board. This is done regardless of the conclusion of the investigation. The Board shall be informed on a regular basis about the number of child protection concerns reported, and the number of concerns dismissed.

b. Reactions following a complaint

Based on the complaint being made ADRA Norway reserves the right to suspend ADRA staff targeted in an allegation and terminate visits by persons implicated in an allegation, prior to the completion of an internal investigation. A decision to suspend an employee or terminate a visit should only be made in order to secure the safety of the child/children and prevent any harm from being inflicted on the child or on ADRA as an organisation. ADRA Norway also reserves the right to terminate a contract, partnership or employment regardless of the outcome of an investigation.

If the investigation process uncovers information giving reasonable indications that a crime has been committed ADRA Norway will hand over the case to the local law enforcement. ADRA Norway will do everything we can to assist any public investigation concerning ADRA Representatives or ADRA activities.

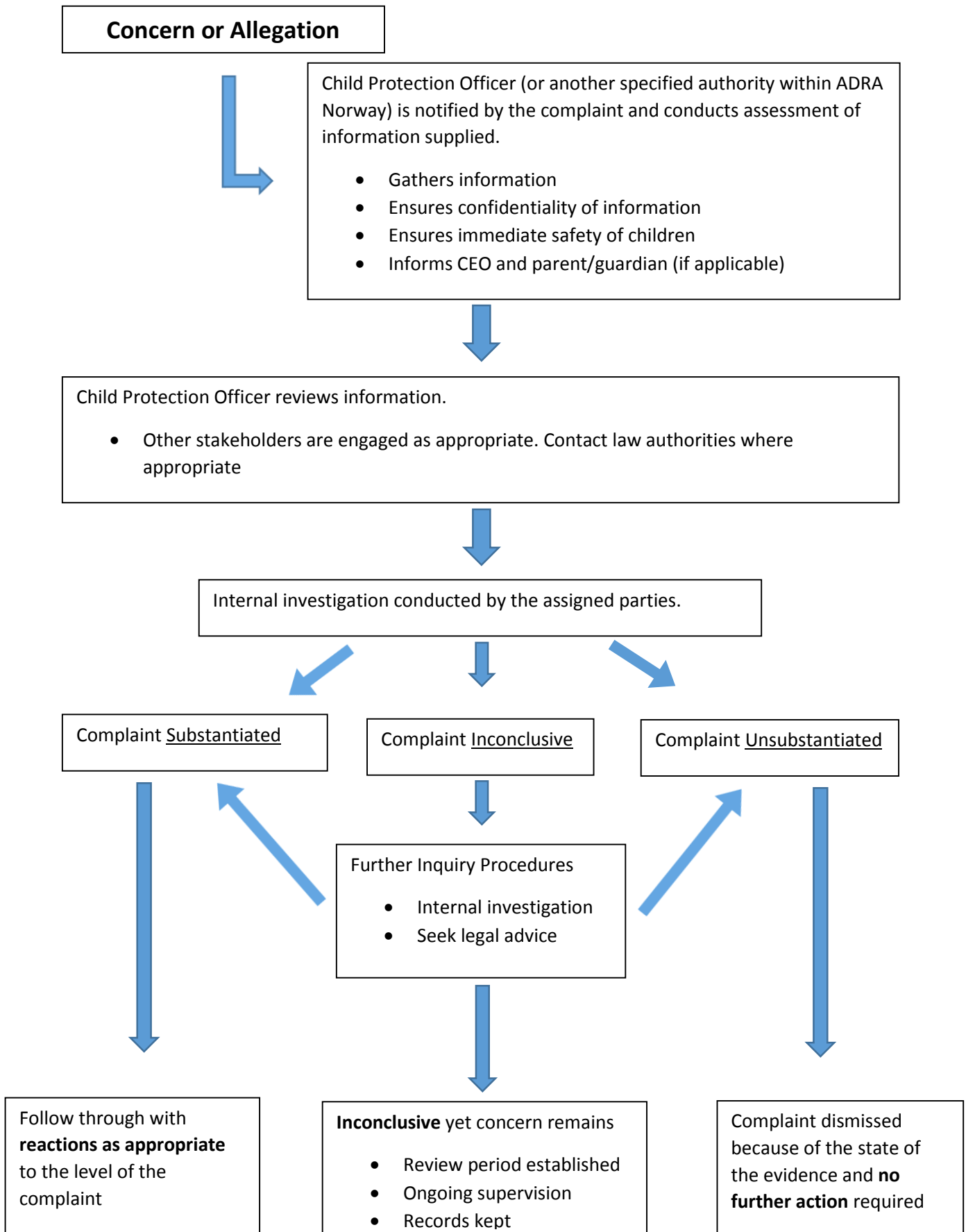
The person reporting the concern will not face any reprimands, regardless of the outcome of the investigation and regardless of whether or not the concern has been reported anonymously, as long as there are no reasonable grounds for believing that the complaint was made to harm the implicated person or ADRA. ADRA Norway encourages the reporting of concerns and does not place any responsibility on its staff or representatives to ensure evidence before making a complaint.

Parties that are inflicted with damage in relation to the case or the investigation will be offered counselling and support. Both children, parents, guardians and ADRA staff may be exposed to harm and psychological distress during an investigation process, and ADRA Norway will offer counselling and support to detect and relieve this distress.

Appendixes:

- 1: Map of complaint process
- 2: Risk assessment form
- 3: Statement of commitment to comply with the child protection policy
- 4: Complaint form
- 5: Table defining risks and recommendations in communication about children

Appendix 1, Child Protection Reporting Process



Appendix 2.a, Risk Assessment Tool:

Level of risk	Level of Screening	Screening Activities	Factors to determine level of screening
High	Full Screening	<p>Applicants will</p> <ul style="list-style-type: none"> • Have their employment or volunteer history checks including an investigation of any gaps between jobs • Have their identity checked with original documents and submit and sign their application forms • Be asked specific child-protection related questions during their interview • Provide three satisfactory referees • Sign the Code of Conduct and Child Protection Policy 	<p>ADRA Norway employees or ADRA Representatives who have contact with the participants (including children) of ADRA projects and activities internationally or domestically (e.g. employees, contractors or volunteers who will visit projects in Norway or abroad).</p>
Medium	Medium Screening	<p>Applicants will:</p> <ul style="list-style-type: none"> • Have their employment or volunteer history checks including an investigation of any gaps between jobs • Be asked specific child-protection related questions during their interview • Provide three satisfactory referees • Sign the Code of Conduct and Child Protection Policy 	<p>Persons who are not ADRA Norway employees, and are ADRA Norway Representatives who have no contact with the participants (including children) of ADRA projects and activities internationally or domestically (e.g. contractors or volunteers who will not visit projects in Norway or abroad); but Have access to project management and information storage software.</p>
Low	Minimal Screening	<p>Applicants will</p> <ul style="list-style-type: none"> • Be asked specific child-protection related questions during their interview • Sign the Code of conduct and Child Protection Policy 	<p>Persons who are not ADRA Norway employees, and are ADRA Representatives who have no contact with the participants (including children) of ADRA projects and activities internationally or domestically (e.g. contractors or volunteers who will not visit projects in Norway or abroad); and Have no access to project management and information storage software.</p>

Appendix 2.b: Program Risk Management Tool

Proposed Program Activity			
Risk description			
Controls already in place			
Risk rating high, medium or low			
What can be done to mitigate these risks?			
Who will carry out this action?			
By when?			

Appendix 3: Statement of commitment to comply with the Child Protection Policy

This statement of commitment should be signed by every ADRA Norway staff, as well as volunteers representing ADRA Norway in ADRA`s projects, following appropriate orientation by the Child Protection Officer or another appropriate employee of ADRA Norway.

I have read ADRA Norway`s Child Protection Policy and agree to abide by its terms in my work and throughout my time as a representative of ADRA Norway and/or its partners. As a person engaged by ADRA Norway, I will use common sense and avoid actions or behaviours that can be construed as child abuse when implementing or participating in ADRA Norway activities. Breaches of this policy will not be tolerated and may constitute grounds for termination of employment contract or volunteer assignment.

I commit to following the correct reporting procedures if inappropriate behaviour is uncovered.

Name: _____

Signed: _____

Date/location: _____

Appendix 4: Child Protection Complaint Form

PART A – Complainant to complete:

Person making complaint (can be anonymous):

Date:

Who is the complaint about?

Who was the victim of the breach of conduct (name and contact details described but not essential)?

When did the breach of conduct occur?

What was the breach of conduct?

Where did the breach of conduct occur?

Who else was involved in this breach of conduct?

How did you come by this information about the breach of conduct?

Any other details you would like to add?

PART B – Complaint Officer to complete

Date received by ADRA Norway Complaint Officer:

Was this complaint investigated? Yes/No

If No, why not?

Is there evidence or suspicion of a breach of conduct? Yes/No

If No, what is the next step you will take?

If Yes, what disciplinary action or further investigation will take place?

What is the final outcome of this complaint?

Report submitted to ADRA Norway? Yes/No

Date of completion:

Appendix 5: Risks and recommendation in communication about children

Level of Risk	Recommendation
<p>Level 1 – Low risk of harm or stigma</p> <ul style="list-style-type: none"> ➤ Child lives in a protected environment ➤ Child has a stable and safe network around them (family, institution, etc.) which you have sufficient knowledge about ➤ Child runs a low risk of being pursued by anybody ➤ There is no risk, or little risk of compromising their dignity 	<p>Faces names and geographical location may be revealed.</p>
<p>Level 2 – Medium risk of harm or stigma</p> <ul style="list-style-type: none"> ➤ Child`s situation is unknown (eg. unknown identity, home environment and/or risk to the child) ➤ Small but significant danger of persecution or of a child`s dignity being compromised through publication or broadcast 	<p>Faces, pseudonyms and vague geographical location may be revealed</p>
<p>Level 3 – High risk of harm or stigma</p> <ul style="list-style-type: none"> ➤ Child`s life is in danger ➤ Child is in danger of kidnapping, identification or access by paedophiles ➤ High risk that child`s dignity will be compromised, or other significant danger 	<p>Faces and visuals should be concealed, pseudonyms should be used and locations should be changed</p>