



جمعية المستقبل للتنمية والبيئة

Future Association for Development and  
Environment (FADE)

FADE-CHILD-PROTECTION

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# INTRODUCTION

Independent, private and non-profit, FUTURE ASSOCIATION FOR DEVELOPMENT AND ENVIRONMENT respects a strict political and religious impartiality, and operates following principles of neutrality, non-discrimination, transparency, according to its core values: responsibility, impact, enterprising-spirit and inspiration.

FADE is committed to immediate humanitarian relief to support those in urgent need and protect people's dignity, while co-creating longer term opportunities for sustainable growth and fulfilling people's potential. FADE endeavors to respond to humanitarian crises and build resilience; promote inclusive and sustainable growth; co-construct effective governance and support the building of civil society worldwide by investing in people and their potential.

The commitment of FADE is guided by 4 core values:

- **Responsibility:** we ensure the efficient and responsible delivery of humanitarian aid with the means and the resources that have been entrusted to us.
- **Impact:** we are committed to having the most sustainable impact for the communities and the people with whom we engage.
- **Enterprising-spirit:** we are enterprising and engage in our work with a spirit that creates value and overcomes challenges.
- **Inspiration:** we strive to inspire all those around us through our vision, values, approaches, choices, practice, actions and advocacy.

## A. Policy statement

FADE is committed to respecting the highest standards in terms of efficiency, responsibility and transparency in its activities. To this end, FADE's Child Protection Policy:

- Encourages prevention;
- Promotes detection;
- Sets out a clear investigation process;
- Sets out a mechanism of sanctions.

The policy is aimed at guiding FADE staff and the other entities as defined in Article 2 of this policy, and must be considered together with:

- FADE's Code of Conduct;
- FADE's Grievance Policy;
- FADE's Policy against Sexual Exploitation, Abuse and Harassment;
- FADE's Gender Policy;
- FADE's Conflict of Interest Prevention Policy;
- FADE's Data Protection Policy;
- FADE's Anti-fraud, Bribery and Corruption Policy;
- FADE's Anti-Terrorism and Anti-money laundering Policy;
- FADE's Environmental and Social Protection Policy;
- FADE's procedures, manuals (e.g. Finance, Logistics, Administration & Human Resources, Security & Safety), handbooks (e.g. Transparency & Compliance, Appraisal, Monitoring & Evaluation, Project Management, Project Development) and charters (e.g. Use of Information Systems);

- Code of Conduct for The International Red Cross and Red Crescent Movement and NGOs in Disaster Relief, of which FADE is a signatory;
- U.N. Inter-Agency Standing Committee (IASC) Six core principles relating to Sexual Exploitation and Abuse.

As an NGO operating in many countries, FADE recognizes that children within the communities with which FADE works or comes into contact constitute a particularly vulnerable population group. As such, they are at greater risk of violence, negligence, abuse and exploitation - particularly in disaster and emergency contexts, where their protective environment is severely affected.

FADE is aware that the goods and services provided through its programmes, particularly in emergency and disaster situations, can create an imbalance in the relationship between those employed by FADE or associated with the NGO, as defined in Article 2 of this policy, and programme beneficiaries. FADE recognizes that this power imbalance can be exploited and instrumentalized.

This Child Protection Policy demonstrates FADE's commitment to protect children within the framework of its internal procedures and overall external coordination, and in particular for the implementation of child protection programmes and the mainstreaming of this issue during all its interventions.

This policy also clarifies, for all those working for FADE, what is required in terms of child protection. It also specifies that all violations of children's rights, in whatever form, are unacceptable for FADE and will be sanctioned.

This policy has been developed so that the best interests of the child can be systematically taken into account by FADE and to ensure the integration of child protection at the institutional level in order to promote the maximum protection of children against all forms of ill-treatment and negligence.

This policy ensures that FADE has implemented procedures to prevent and respond to all forms of violence, ill-treatment, negligence, abuse and exploitation regarding children, as well as any violation or non-compliance with this policy or any other related procedures.

This Child Protection Policy is based on national laws, relevant international law and international norms, in particular:

- Convention on the Rights of the Child,
- Code of Conduct for International Red Cross and Red Crescent Movement and Non-Governmental Organizations (NGOs) in Disaster Relief,
- The texts of the Alliance for the Fundamental Standards of Humanitarian Aid,
- The minimum standards for protection during humanitarian action,
- The standard of accompaniment to the Humanitarian Charter and the minimum standards of humanitarian intervention of the SPHERE project.

FADE is committed to the well-being of children. Activities focused on children are based on the principles of the 1989 United Nations Convention on the Rights of the Child and the 1948 United Nations Declaration of Human Rights.<sup>1</sup> These principles are:

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<sup>1</sup> General Assembly (10 December 1948), *The Universal Declaration of Human Rights (UDHR)*. <http://www.un.org/en/universal-declaration-human-rights/>

- The best interests of the child;
- Non-discrimination;
- Freedom of expression;
- Respect for children's views in issues of interest to them;
- Child participation.

Exploitation and violence against children refers to any physical and/or psychological form of ill-treatment, sexual abuse, negligence, abandonment or negligent treatment, exploitation, including commercial exploitation, including the use of children for military purposes, which may result in actual or potential harm to the health, survival, development or dignity of the child, in the context of a relationship of responsibility, trust or power.

FADE is committed to take concrete measures to prevent the recruitment or engagement with FADE of perpetrators of all forms of violence against children, including anyone associated with FADE, as defined in Article 2 of this policy. All those directly or indirectly involved in the implementation and monitoring of FADE's programmes and actions are bound by its Child Protection Values.

If despite FADE 's precautions, any person working with FADE violates the provisions of this policy, FADE will take disciplinary action in accordance with this policy.

## **B. FADE's child protection principles**

In order to reach the above-mentioned objectives, FADE is committed to raise awareness among all FADE staff, to carry out a prevention policy and, if required, to sanction behavior that contravenes the present policy.

### **1. Awareness**

- Training: As part of its recruitment, FADE is training its staff and partners in the Code of Conduct, the Child Protection Policy and the reporting of all forms of violations. Whenever updates are prepared, sessions are organized to ensure that FADE staff is aware of any update and best practices regarding child protection.
- Staff directly involved in child-related activities will receive additional technical and specialized training, and may develop their skills on the subject, including (but not limited to) child protection policy, prevention of and response to violence against children, and integration of child protection into programmes.

### **2. Prevention**

- Recruitment and selection of staff: FADE prevents the employment/deployment of inappropriate individuals through rigorous selection processes, (i) face-to-face and videoconference interviews - where possible -, (ii) verification of experiences and references, including - where possible - obtaining additional documents provided by third parties for staff in direct contact with children. Persons who are registered for crimes and offences against children or persons who have been accused or convicted of serious criminal activities, as far as the information are accessible, are not entitled to be in direct contact with children as part of an FADE programme. Serious criminal activities include, among others: murder, sexual offences, offences and convictions for aggravated assault and battery, indecent behavior, abduction crimes, crimes related to child prostitution or child pornography.
- Selection of partners and subcontractors: FADE does not sign contracts with partners or suppliers who cannot respect strict codes of conduct and professionalism, applying the principle of "knowledge of its supplier" for all national, international and restricted calls for tenders. Suppliers, as far as possible, are required to sign an ethical declaration clearly stating their responsibilities for the protection of children prior to the finalization and signing of service or supply contracts.

- Strict application of the FADE's Code of Conduct: all FADE staff and those of partner organizations must, within the framework of their contract, strictly apply the Code of Conduct. The Code explicitly prohibits harassment, abuse, sexual abuse and exploitation of children.

### 3. Action in case of policy violation

- Investigation: if behaviors violating the requirements of this policy are reported to FADE, FADE is committed to carry out a thorough, impartial and timely investigation in order to fully investigate the allegations.
- Aware of the importance of a rapid response to allegations concerning child protection, FADE is committed to do its utmost to ensure that the reports relating to the present policy can be treated as a priority.
- If it is confirmed that a person associated with FADE, as defined in Article 2 of this policy, has committed an act of violence against a child, a criminal act or any act that would violate children's rights or contravene the principles and norms listed in this document, FADE will take disciplinary measures as well as any other action adapted to the facts and circumstances.

## INTERPRETATION AND APPLICATION

### Article 1 – Scope of Application

1. The policy applies to all FADE staff and governance members.
2. The provision of this policy may also be applied to any person employed by an entity that carries out missions for FADE.
3. In particular, this policy applies to implementing partners depending on specific clauses and conditions of the grant agreement, suppliers, sub-grantees, beneficiaries (as victims), stakeholders, consultants and other associated entities.

### Article 2 – Definitions

1. **Direct contact with children:** For the purposes of this policy, being in the physical presence of a child or children in FADE's work, whether occasionally or regularly, in the short or long term.
2. **Child:** For the purposes of this document, a "child" is defined as any person under 18 years of age, in accordance with the United Nations Convention on the Rights of the Child.
3. **Ill-treatment or negligence:** All forms of physical and/or psychological abuse, sexual abuse, negligence 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. Seven subtypes, in particular, are distinguished, in accordance with the definitions adopted, inter alia, by the WHO:
  - i. **Physical abuse:** Actual or potential physical harm as a result of an interaction or lack of interaction, that is reasonably within the power of a person in a position of responsibility, power or trust. This may be a single incident or repeated acts.

- ii. **Sexual abuse:** any use of a child's body for sexual purposes for the pleasure of someone older than the child, regardless of the relationship between them, and even without coercion or violence.
  - iii. **Commercial or other exploitation:** The use of a child for work or other activity in the interest of others. This includes, but is not limited to, work. These activities are harmful to the child's physical and mental health, education and spiritual, moral or emotional social development (WHO, 1999). Children in the armed forces fall into this category.
  - iv. **Sexual exploitation:** The abuse of a position of vulnerability, differential power or trust for sexual purposes; this includes, inter alia, profiting financially, socially or politically from the sexual exploitation of a child. Prostitution and child trafficking for sexual purposes are examples.
  - v. **Emotional maltreatment:** Failure to provide appropriate and supportive conditions for development, including a person to whom the child can relate as a priority, allowing the child to develop a range of stable emotional and social skills consistent with his or her personal potential and the context of the society in which he or she lives. It may also include acts that cause or are very likely to cause harm to the child's physical, mental, spiritual, moral or social health or development. Such acts must reasonably be the responsibility of the parent or person exercising a relationship of responsibility, trust or power. These include restriction of movement, denigration, use of the child as a scapegoat or sufferer, threat, intimidation, discrimination, derision or any other non-physical form of hostile treatment or rejection (WHO, 1999).
  - vi. **Negligence and negligent treatment:** The caretaker's inattention, carelessness or failure to ensure the child's development in all areas, including health, education, emotional development, nutrition, shelter and safe living conditions, within the context of reasonably adequate resources. It is also about failing to provide the child with the necessary care and protection from harm to the extent possible (WHO, 1999).
  - vii. **Child labor:** Child labor includes full-time work by children under the age of 15 that prevents them from attending school (getting an education) or is hazardous to their health (International Labor Organization, Convention 138). FADE applies a minimum age of 18 years. Part-time child labor is permitted from the age of 15, except for activities that could in any way impede the child's access to education or development.
4. **FADE Staff:** Under the terms of this policy, the term "FADE staff" refers to any person employed by FADE and/or one of its sister organizations and/or one of the member organizations of the FADE network. The interns of FADE and/or one of its sister organizations and/or one of the member organizations of the FADE network are considered to fall within this category, for the purposes of this policy.
  5. **Governance:** Under the terms of this policy, the term "governance" refers to any person elected by decision making bodies to participate in the managerial and administrative bodies of FADE and/or one of its sister organizations and/or one of the member organizations of the FADE network. In particular, the members of boards of directors and supervisory boards are Governance members.



6. **Implementing partners:** Under the terms of this policy, an “implementing partner” is a partner to whom the implementation of one or more projects or activities has been delegated, and to whom a budget has been allocated for this purpose. In particular, this refers to international NGOs and/or national NGOs and/or public institutions.
7. **Stakeholders:** Under the terms of this policy, “stakeholders” are individuals or groups, with or without a legal personality, who directly or indirectly, voluntarily or involuntarily, contribute to, participate in or benefit, in any way, from the actions, programmes and activities of FADE and/or one of its sister organizations and/or one of the member organizations of the FADE network.
8. **Associated Entities:** Under the terms of this policy, “associated entities” are legal persons under private or public law who play an active role in the implementation of the project but are not responsible for managing any budget.
9. **Beneficiaries:** Under the terms of this policy, the term “beneficiaries” refers to any person who benefits, directly or indirectly, from FADE’s programmes.
10. **Sub-grantee:** Under the term of this policy, a “sub-grantee” is an individual or a group, with or without legal personality, who receives a budget to carry out a project or activity.
11. **Supplier:** Under the term of this policy, a “supplier” is a third party, individual or group, with or without legal personality, who directly or indirectly provides any type of goods and/or services to FADE and/or one of its sister organizations and/or one of the member organizations of the FADE network, whether for a fee or not.
12. **Consultant:** Under the term of this policy, a “consultant” is a third party, individual or group, with or without legal personality, who directly or indirectly provides any type of consulting services to FADE and/or one of its sister organizations and/or one of the member organizations of the FADE network, whether for a fee or not.

### Article 3 – Information and adherence to the Policy

1. This policy is published under the authority FADE. FADE staff, as well as the other entities referred to in Article 1 of this policy, are required to conduct themselves in accordance with this policy and must therefore be aware of and have understood its provisions and any changes. When they are unsure of how to proceed, they should seek the advice of a competent person, notably their line manager.
2. FADE staff, as well as the other entities referred to in Article 1 of this policy, who are responsible to negotiate the terms of conditions of employment of any FADE staff, must ensure that staff is aware of and commits to the full respect of this policy.
3. It is the responsibility of FADE staff with managerial responsibilities, as well as the other entities referred to in Article 1 of this policy, to ensure that staff under their supervision comply with this policy; and to take or propose appropriate disciplinary measures as sanction against any violations of its provisions.
4. This policy shall form part of the working conditions of FADE staff and the conditions for the performance of the missions of the other entities referred to in Article 1 of this policy from the moment they certify that they have read it.

5. FADE will review the provisions of this policy at regular intervals.

## Article 4 – Purpose of the Policy

The purpose of this policy is to:

1. Implement mechanisms of child protection and child ill-treatment or negligence prevention for FADE staff and other entities referred to in Article 1 of this policy.
2. Specify the rules on child protection and child ill-treatment or negligence prevention that FADE staff and the other entities referred to in Article 1 of this policy must observe.
3. Inform third parties of the conduct that they are entitled to expect from FADE staff and the other entities referred to in Article 1 of this policy.

# GENERAL PRINCIPLES

## Article 5 – Neutrality

FADE staff and the other entities referred to in Article 1 of this policy, must fulfil their duties in a neutral and apolitical manner, in accordance with the law, legitimate instructions and ethical rules relating to their roles.

## Article 6 – Impartiality

In the context of their professional roles and/or their missions, FADE staff and the other entities referred to in Article 1 of this policy, must act in accordance with the law and exercise their discretionary power in an impartial manner, taking into consideration only relevant circumstances into consideration.

## Article 7 – Confidence of stakeholders

FADE staff and the other entities referred to in Article 1 of this policy, have a duty to conduct themselves at all times in a way that reflects and upholds FADE's values of integrity, impartiality and efficiency and contribute to strengthen the confidence of all stakeholders.

## Article 8 – Hierarchical responsibility

FADE staff report to their immediate line manager and/or the head of their functional department, unless otherwise provided for by law.

## Article 9 – Confidentiality

Duly considering the stakeholders' potential right to access information, FADE staff and the other entities referred to in Article 1 of this policy, must process all the information and all the documents acquired during or as part of the exercise of their duties with the necessary confidentiality.

## Article 10 – Protection of privacy

All the necessary measures must be taken to ensure that the privacy of FADE staff and of the other entities referred to in Article 1 of this policy, is appropriately respected; as a result, the declarations provided for this policy must remain confidential, unless otherwise provided for by law.

## Article 11 – Information held

1. Considering the general framework of international law regarding access to information held by private individuals, FADE staff and the other entities referred to in Article 1 of this policy, should disclose information only in respect to the rules and requirements applicable to FADE.
2. FADE staff and the other entities referred to in Article 1 of this policy, must take appropriate measures to guarantee the security and confidentiality of the information for which they are responsible or of which they are aware.
3. FADE staff and the other entities referred to in Article 1 of this policy, must not seek access to information which would be inappropriate for them to have. FADE staff, as well as the other entities referred to in Article 1 of this policy, must not make inappropriate use of the information they may obtain in or as part of the exercise of their duties.
4. In the same way, FADE staff and the other entities referred to in Article 1 of this policy, must not retain professional information that may or should be legitimately circulated, or circulate information they know, or have reasonable grounds to believe, is inaccurate or misleading.

## Article 12 – Responsibility of line managers

1. FADE staff in charge of supervising or managing other FADE staff must do so in accordance with the policies and objectives of FADE. They are responsible for responding to acts and omissions of staff under their supervision who violate these policies and objectives, and to take due diligence measures expected from a person in their position to prevent such acts or omissions.
2. FADE staff tasked with supervising or managing other FADE staff must take the necessary measures to protect children and prevent staff under their supervision from engaging in acts likely to generate child ill-treatment or negligence. These measures may be: to draw attention to and implement the laws and regulations; to ensure adequate training related to child ill-treatment or negligence and to set an example of integrity through their personal conduct.

# CHILD PROTECTION MECHANISM

## Article 13 – Importance of prevention

1. FADE staff and the other entities referred to in Article 1 of this policy, shall be sensitized to the children's rights. To this end, FADE is training FADE staff in the FADE's Code of Conduct, this policy and specifically informing about the need to report any form of child ill-treatment or negligence.
2. FADE staff who are in direct contact with children are entitled to receive special training in particular on Child Protection Policy, prevention and response to child ill-treatment or negligence as well as on integration of child protection into programmes.
3. FADE staff, as well as the other entities referred to in Article 1 of this policy shall actively protect the child in particular through attention, prevention and response to all forms of child ill-treatment or negligence as defined in Article 2 of this policy.

## Article 14 – Prevention and identification mechanisms

1. Although, through its international actions. FADE is faced with the most diverse cultures and belief systems FADE fully upholds principles of freedom of speech and of protection of victims. As such, FADE has developed mechanisms that can contribute to prevent child ill-treatment or negligence such as:
  - Signing of the Code of Conduct by the staff in order to clarify unacceptable behavior and in particular child ill-treatment or negligence;  
The FADE Feedback Mechanism (FFM), as a direct communication channel between beneficiaries and FADE, allowing the identification of sensitive complaints notably related to alerts of child ill-treatment and negligence;
  - Implementation of trainings and awareness sessions in order to train and empower the teams, particularly for staff exposed to working with minors or the most vulnerable population;
  - Identify risk factors on an ongoing basis and in particular throughout the project cycle;
  - Put in place evaluation procedures for FADE partners by carrying out due diligence, particularly with regard to their ethical commitments and past behaviors.
2. FADE staff responsible for recruiting, monitoring or directing others employed by FADE must be careful to prevent the hiring or deployment of inappropriate individuals in direct contact with children. FADE will not allow an individual to work with children if it is aware of any professional or personal history that suggests that the individual may pose an unacceptable risk to children.
3. FADE staff shall ensure that no FADE partner or subcontractor is in direct contact with children if they have already been convicted of, or registered on lists or registers for, offences of child ill-treatment or negligence, within the meaning of this policy and regardless of the legal qualification retained by the national courts.
4. As soon as FADE is aware of, any person who has been convicted of, or registered on lists or registers, for offences of child ill-treatment or negligence, within the meaning of this policy and regardless of the legal qualification retained by the national courts, shall not be in direct contact with children, within the framework of FADE's programmes.

5. Any FADE partner or subcontractor in direct contact with children must certify that they have read and comply with the provisions of this policy.

## Article 15 – Prohibition of all forms of child ill-treatment or negligence

It is strictly forbidden for FADE staff and the other entities referred to in Article 1 of this policy, directly or indirectly, voluntarily or involuntarily, to participate, organize or benefit, by any means whatsoever, from any form of child ill-treatment or negligence as defined in Article 2 of this policy.

## Article 16 – Specific behavioral standards for staff working with children

In addition to expected behaviors resulting from FADE's Code of Conduct and this policy, staff working with children are expected to abide by the following additional standards:

- Treating all children with respect
- Not using inappropriate, harassing, abusive, sexually provocative, degrading or culturally inappropriate language or behavior towards children
- Not encouraging children to engage in any form of sexual intercourse or activity, including paying for sexual services
- Wherever possible, ensuring that another adult is present when working with children
- Not inviting unaccompanied children into private residences unless they are at immediate risk of injury or physical danger
- Not sleeping in the vicinity of unsupervised children unless absolutely necessary, in which case permission should be obtained from the person in charge and another adult should be present if possible (this rule does not apply to a person's own children)
- Never using computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material by any means
- Not using corporal punishment of children
- Not employing children in domestic or other work that is not appropriate to their age or stage of development, that interferes with their time for education and recreational activities, or that exposes them to significant risk of injury
- Complying with all relevant local legislation, including labor laws regarding child labor
- Immediately reporting concerns or allegations of child exploitation and abuse, and non-compliance with the policy, in accordance with Article 19 of this policy
- Immediately reporting all charges, convictions and other findings of an offence related to child exploitation and abuse, including those under traditional law, that occurred prior to or during the contract with FADE
- Being aware of and avoid actions or behaviors that could be perceived by others as child exploitation and abuse.

## Article 17 – Behavior to be followed in case of child ill-treatment or negligence

1. In the case of FADE staff who witness child ill-treatment or negligence:
  - If FADE staff believe that they are witness to any of the conduct set out in Article 2 of this policy, committed against any individual, they shall immediately report to FADE's email [info@fade-org.ps](mailto:info@fade-org.ps) in accordance with Article 19 of this policy.

- Cumulatively, staff may choose to intervene with the objective of stopping the said behaviour and protecting the victim if he or she was comfortable doing so.
  - It is advisable to note the day and time as well as details related to the facts and the names of any witnesses.
  - In any case, the Human Resources Direction will be informed by the FADE Investigation Unit.
2. In the case of a stakeholder who witnesses child ill-treatment or negligence:
- If any stakeholder as defined in this policy believes that he or she is a witness or victim of the violation of this policy, they shall immediately report to FADE's Email [info@fade-org.ps](mailto:info@fade-org.ps) in accordance with Article 19 of this policy.
  - Cumulatively, the stakeholder may choose to intervene with the objective of stopping the said behavior and protecting the victim, if he or she was comfortable doing so
  - It is advisable to note the day and time as well as details related to the facts and the names of any witnesses.
  - In any case, the Human Resources Direction and/or Country Director will be informed by the FADE Investigation Unit.

## Article 18 – Photographs of children

1. Taking and distributing pictures of children is not allowed for FADE staff in the framework of their professional duties.
2. Only persons duly authorized by FADE Country Director in the countries or by FADE Communication Department can take photos of children in connection with FADE Programmes.
3. Authorized persons shall:
  - Comply with local practices and restrictions related to the reproduction of personal images before photographing or filming a child;
  - Obtain the child's express verbal consent and the written consent of the child's parent or guardian before photographing or filming the child. Within this framework, the objective and the use of the produced photographs will have to be explained;
  - Ensure that photographs, films, videos and other representations present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children must be dressed and must not pose in a manner that could be considered provocative or sexually suggestive;
  - Ensure that images are honest representations of context and reality
  - Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.
4. In addition, authorized persons shall:
  - Obtain the express consent of the child and the written consent of the child's parent or guardian before using an image for publications, advertising, fundraising, advocacy or other purposes, in print or online. The explicit (unwritten) consent of the child's parent or guardian is sufficient if the photos are taken in the private home. The purpose and use of the photographs will be clearly specified to the consenting party;
  - Obtain explicit consent from the child, but not necessarily from the child's parent or guardian, for the images and photos with children from behind or at a distance (not identifiable);
  - Not reveal the identity of the information or divulge information such as to enable children to be identified or located in the image through the name of the photo files, as well as the metadata or

descriptions and texts associated with the photos, in the context of the dissemination, sending and publication in all their forms of electro-technical images ;

- Not publish identifiable photos of children on social networks or any other online media without the formal approval of FADE's Communication Department.
5. The use and publication online and print by FADE of any photo with a child in the image is made by FADE's Communication Department or after explicit approval by FADE's Communication Department. FADE's Communication Department will only publish photos with children in the image accompanied by supporting documents as detailed above.

## Article 19 – Obligation to report for FADE staff

1. FADE intends to respond/come up with an answer/bring an (appropriate) response to any child ill-treatment or negligence. To contribute towards this, FADE has a reporting Email.
2. FADE staff who considers to be a witness of child ill-treatment or negligence which may be in violation of or contravenes to the present policy, must immediately report it through its Email: [info@fade-org.ps](mailto:info@fade-org.ps).
3. FADE staff must report any suspicion of child ill-treatment or negligence of which they are aware of in the course of their duties. The investigation of the reported facts is FADE's responsibility, in accordance with the provisions of Article 21 of this policy.
4. FADE staff may use the Security Incident Reporting (SIR) format.
5. FADE must ensure that FADE staff who reports a case as described above on the basis of reasonable suspicions and in good faith does not suffer from any harm as a result.
6. Cases of misuse of alert mechanisms may be subject to sanctions.

## Article 20 – Report to stakeholders

1. FADE wishes to support people who are witnesses or victims of violations of the present policy. To this end FADE intends to facilitate stakeholders reporting for any violation of this policy. Thus, any stakeholder, as defined in this policy, who is a witness or victim of the violation of the present policy can report to FADE through the FADE Feedback Mechanism (FFM)
2. FADE must ensure that any stakeholder who reports a case as described above on the basis of reasonable suspicions and in good faith does not suffer from any harm as a result.

## Article 21 – FADE investigation in case of internal reporting

1. In accordance with Article 19 of the present policy, FADE staff must immediately report to the FADE Transparency Line <https://transparency.FADE.org/>, or transparency[info@fade-org.ps](mailto:info@fade-org.ps) in case of suspicion of child ill-treatment or negligence.
2. An e-mail response is sent on the platform or by transparency[info@fade-org.ps](mailto:info@fade-org.ps) upon receipt of the alert. This answer:
  - details the process to be followed in cases of suspected child ill-treatment or negligence;
  - requests, where appropriate, further clarification and evaluation of the alert.
3. The management of the alert is done from FADE headquarters with the involvement of the Country Director, unless this person is the subject of concern. This evaluation is carried out by the FADE Investigation Unit upon receipt of the alert on FADE Transparency Line.
4. FADE staff must:
  - Cooperate in any investigation conducted by FADE;
  - Keep all records of any alleged involvement that may be required for an investigation;
  - Preserve the confidentiality of any allegation.

## Article 22 – FADE investigation in case of reporting by a stakeholder

1. In accordance with Article 19 of this policy, stakeholders may report through the FADE Feedback Mechanism (FFM).
2. A response via the Complaints and Response Mechanisms, or directly on the platform, will be provided upon receipt of the alert. This response:
  - details the process to be followed in the event of suspicion of child ill-treatment or negligence;
  - requests, where appropriate, to provide further clarification and elevation of the alert.
3. FADE staff and other entities referred to in Article 1 of this policy must:
  - cooperate in any investigation conducted by FADE;
  - keep all records of suspected involvement in such cases that may be required in case of investigation;
  - preserve the confidentiality of all allegations.

## Article 23 – Investigating authority

1. The Investigation Unit of the HQ is in charge of investigating of all child ill-treatment or negligence issues within FADE.
2. FADE retains the right to hand over the investigation process to an external entity.



## Article 24 – Sanction for child ill-treatment or negligence

### 1. **Disciplinary sanction**

The violation of the present policy, which constitutes in particular a violation of FADE's Code of Conduct, may result in sanctions ranging from warning to termination of the employment contract for serious misconduct, with no notice and no payment of compensation.

### 2. **Other sanctions**

FADE reserves the right to use the full range of contractual sanctions, up to the termination of any contractual relationship, in the event of a breach of this policy by any entity referred to in Article 1 of this policy.

### 3. **Reporting to competent authorities**

FADE has the right, depending on the seriousness of the facts found, to report to the competent prosecution authorities the facts constituting child ill-treatment or negligence.

## IMPLEMENTATION OF THE POLICY

### Article 25 – Implementation of the policy

The Human Resources Department is responsible for the independent oversight of child protection policy and is responsible for its implementation within FADE.

This Child Protection Policy came into effect after approval by FADE Board on the 17<sup>th</sup> March 2023.

### Article 26 – Adherence to the Policy

FADE staff and the other entities referred to in Article 1 of this policy, certify that they adhere to these principles by signing the FADE Policy Acceptance Form and/or by signing their employment contract.