

FREE A GIRL USA

POLICY BOOKLET



Free a Girl Foundation USA, Incorporated

170 S Main Street, Ste 1125

Salt Lake City, UT 84101

Free a Girl is a 501(C)(3) non-profit registered in the US under EIN: 38-4167911.

Welcome to the Free a Girl USA Policy Booklet. This comprehensive guide is designed to provide all employees and stakeholders with a thorough understanding of the policy guidelines, procedures, and expectations applicable within our organization. As a dedicated entity, we strive to foster an environment based on transparency, integrity, and adherence to the highest standards.

Contained within this policy booklet is a wealth of information covering various aspects of our operations, including but not limited to, ethical standards, professional conduct, safety protocols, and operational procedures.

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CHILD SAFEGUARDING POLICY AND CODE OF CONDUCT

A. GOAL

Free a Girl is dedicated to freeing young girls from situations of sexual exploitation and prosecuting the offenders. Free a Girl is committed to protecting children from harm and to uphold their rights, in line with the United Nations (UN) Convention on the Rights of the Child.

The objectives of this Child Safeguarding Policy are:

- i. To **prevent** any harm or abuse of children by providing clear protocols and guidelines on addressing child safeguarding risks at the organizational level of Free a Girl.
- ii. To establish a common understanding of child safeguarding issues and good practices within the organization so that staff members can recognize and **respond** to child safeguarding risks and signs of abuse and protect children and their rights.

The Child Safeguarding Policy is cross-cutting and supports other policies of Free a Girl, including the General Code of Conduct, Anti-fraud and Corruption Policy, Travel Policy and Staff Handbook.

B. SCOPE OF THE CHILD SAFEGUARDING POLICY

This Child Safeguarding Policy covers the systems, procedures and operations of Free a Girl as an organization, and applies to all Free a Girl staff members, board members, volunteers, interns, consultants, ambassadors, local partner organizations or anyone acting as a representative of Free a Girl (hereafter referred to as staff representatives).

Free a Girl provides resources and strategic program support to local partner organizations working directly with victims of sexual exploitation of children (SEC). Free a Girl acknowledges there are broader child protection issues faced by local partner organizations in the environments in which they work which are being addressed through the programs of these partners, but taking place outside of the partner organization and outside of the project they implement with Free a Girl support – for example domestic violence, abuse by the police, sexual exploitation, et cetera. This policy does not address such issues, as these types of child protection concerns take place outside the partner organization and outside the project.

However, staff members of Free a Girl and of local partner organizations are expected to take a proactive role in preventing harm to children with whom they are in contact, and in responding to alleged cases of harm, abuse and exploitation within and external to the organization. This may include the responsibility in some cases to respond to child protection concerns by notifying or referring cases to relevant agencies. Non-compliance with the policy shall be taken seriously. This will involve a thorough investigation and referral of cases to the police and/or relevant agencies and where applicable can lead to immediate termination of employment and/or involvement in the organization.

The Director of Free a Girl has overall responsibility for ensuring that the guidelines set out in the Child Safeguarding Policy are adhered to as well as monitoring and evaluating the actions and effectiveness of the policy. There is a designated Child Safeguarding Representative for the organization, who is also a staff member, who is responsible for carrying out operational tasks related to implementing, monitoring and evaluating the policy.



C. PREVENTION

1. Human Resources

To ensure implementation of the policy Free a Girl will create awareness and understanding of the policy amongst all people associated with Free a Girl including local partner organizations. There are procedures for recruitment, training and performance review of staff and Free a Girl representatives to safeguard the protection of children. Free a Girl staff members will ensure that positive action is taken to support and protect children where concerns arise.

1.1 Recruitment

Free a Girl ensures that:

1.1.1. Job specifications and terms of reference for new staff positions or consultancies outline basic child safeguarding responsibilities and makes reference to Free a Girl's Child Safeguarding Policy.

1.1.2. Appropriate checks of the prospective employee are undertaken, including verifying qualifications, identity, criminal background, and employer references as well as seeking explanations if there has been a gap in employment.

1.1.3. A certificate of conduct is issued, which declares that the applicant has not committed any criminal offences that are relevant to their duties at Free a Girl.

1.2 Induction

Free a Girl ensures that:

1.2.1 Staff receive awareness training during initial induction on child safeguarding, with the purpose of developing their knowledge and understanding on the Child Safeguarding Policy, and on the possible harmful effects and child safeguarding risks of our work on children, and specific vulnerabilities around gender, disability, ethnicity and sexual orientation.

1.2.2 Awareness training is documented, for policy monitoring and evaluation purposes.

1.2.3 New staff members upon starting their employment and receiving a training in child safeguarding, sign the Child Safeguarding Code of Conduct. The Child Safeguarding Representative is responsible for the collection of staff members' signed codes of conduct, which are filed and stored by the Child Safeguarding Representative.

1.3 Performance Management

1.3.1 Head of departments are responsible for identifying child safeguarding needs of staff members and that the identified needs are met, e.g. through supervision and performance reviews.

1.3.2 Adherence to the Child Safeguarding Policy is part of job profiles/descriptions and monitored in performance reviews.

1.3.3 Performance reviews must assess that:

i. staff members demonstrate good knowledge of Child Safeguarding guidelines and Code of Conduct (e.g. understand how to depict children in media and communications and how to report an incident); and

ii. staff members can identify cases in their work in which there have been successes, challenges and improvements in ensuring child safeguarding.

2. Media and Communications

Free a Girl strives to protect the privacy of children and to prevent any additional harm to them. Free a Girl adheres to the following principles in relation to media and communications, such as publication of images, interviews with reporters, and films.

2.1 Informed consent

- i. Informed consent must be obtained from all persons featured in an identifiable manner in media published by Free a Girl. In most cases, photographing and filming people in public spaces does not need informed consent procedures, except for in Brazil. Therefore shooting on the street (including red light district) and in demonstrations does not require informed consent. Publishing images and film with identifiable persons that were shot in private spaces requires informed consent. However, informed consent is not required when person(s) are not identifiable (large crowds, soft focus shots, people in the background with blurred features, back of the head).
- ii. For children under twelve years old, consent from a parent(s)/caregiver(s) is to be sought (see Image and Consent release for participants under 18 years old form). For children between twelve and eighteen years old, consent needs to be sought from both the parent(s)/caregiver(s) and the child (see Image and Consent release for participants under 18 years old form). For people eighteen years and older, only their consent needs to be sought and no parental/adult consent is needed (see Image and Consent release for participants over 18 years old form).
- iii. In cases where a child under twelve years old or between twelve and eighteen years old is in the care and supervision of a local partner organization, the authorized person from the organization can give consent as a parent/caregiver would, acting in the child's best interests, and should be an adult the child trusts.
- iv. Consent can be obtained through the Free a Girl Image and Consent Release Form as far as possible, or through verbal consent filmed on camera (where safe and appropriate). The Image and Consent Release Form can be used by Free a Girl's local partner organizations or other external agencies working with Free a Girl. Free a Girl will make the form available in the local language of the subject where appropriate. All subjects should sign the form or give verbal consent on camera agreeing to be photographed and/or filmed as per the instructions on the consent form.
- v. Anyone who is featured in a photograph or on film will have understood why the materials are being gathered and how they will be used, before anything is captured, including that the content may be spread locally and globally.
- vi. Free a Girl has a full and frank discussion with anyone who is featured in the photograph or film on consent. In the case of children, the discussion is held both with the child and his/her parent(s)/caregiver(s), if possible. No one should be pressured in any way.

2.1.1 If a subject seems confused or uncomfortable, the photograph and footage should not be taken until the issue has been resolved.

- i. If a child or adult has given full informed consent to be identified in photographs displayed on social or mainstream media, but withdraws their consent at any point, Free a Girl must remove the images from media where possible.

2.2 Content use (photography and film)

Any child who is vulnerable, including a victim of SEC, should not be identifiable in any photograph, film or by name, in any publication or media channel of Free a Girl; therefore the name must be changed and visual identity must be obscured so they are unrecognizable. A vulnerable person includes someone who is:

- i. very ill (e.g. HIV-positive, living with AIDS, or died from AIDS);
- ii. in mental or physical distress;
- iii. a perpetrator of physical or sexual abuse;
- iv. a victim of physical or sexual abuse, exploitation or violence, including domestic violence;
- v. a child combatant;

- vi. accused or convicted of a misdemeanor;
- vii. undocumented, a refugee or seeking asylum.

This prohibition stands regardless if the person or anyone responsible for the care of the person gives consent or even if any agency which may own the photograph gives consent.

2.2.1 Free a Girl considers changing the names and obscuring visual identify of other persons (children and adults) not considered as vulnerable, including orphans or program beneficiaries.

2.2.2 When in doubt of the vulnerable conditions of the person, describe or depict the general situation of adults or children and not the individual situation.

2.2.3 When represented in images, video or text, adults and children must be accurately portrayed and in a way that avoids causing harm to them. Any content used should preserve the dignity of children and avoid presenting them as victims, showing their agency.

- i. Content with children must not be manipulated or sensationalized but provide a balanced depiction of their life and circumstances.
- ii. Children are not (further) stigmatized.
- iii. Avoid descriptions of children that put them in danger of harm, abuse, discrimination or exclusion by his/her community.
- iv. The subject of the photo or film should be able to give their own account/story where possible.
- v. Ensure that the place where the child will be photographed, interviewed or filmed is child-friendly and safe, including minimizing the number of people present (but at least two adults) and the time needed to gather the content.
- vi. Ensure a child friendly space where children can speak freely, without interference or pressure of others.
- vii. When video- or audio recording, ensure that the choice of background (images/sounds) does not negatively impact the image of the child and/or his/her life and story.
- viii. Make sure that the child is not exposed to danger or disadvantage through demonstrating his or her home, community or general living circumstances (i.e. details such as distinctive buildings, street signs or landmarks that enable the person to be traced to their community or home).
- ix. Do not stage anything, children should tell their own stories and histories.
- x. Do not show children undressed or in inappropriate poses.

2.2.4 Retouching and editing of content is permitted to a certain extent, so as to prevent serious manipulation of meaning, change of the original narrative, story or mood. Minimal cropping of unimportant and unintentional details in the background and slight alterations of colour balance, is permitted.

2.2.5 Content should be properly credited.

2.2.6 Ensure film footage is filed with clear logs.

2.2.7 Images are filed with full, accurate captions and are displayed with these accurate captions. The specific location of a child, such as village, should not be used, however, the city, district or region can be used.

2.2.8 For personal social media accounts, staff representatives must follow informed consent procedures (as detailed in 2.1. Informed Consent) when publishing content that features children involved with Free a Girl. Staff representatives should not invite children to link up on personal social media accounts.

2.3 Working with media

Free a Girl engages with media professionals and agencies to raise awareness of the work of Free a Girl in the public, and their staff should abide by the following guidelines when doing so.

2.3.1 Free a Girl expects all media personnel engaged to respect the right to privacy, the right to protection of vulnerable children, and to uphold ethical and professional standards when reporting on issues involving vulnerable children, in line with this Child Safeguarding Policy.

2.3.2 Media personnel that are working on behalf of Free a Girl that have contact with and are producing content with children are required to read the Child Safeguarding Policy and sign the Code of Conduct.

2.3.3 check the reference for the photographer/journalist/translator that is involved.

2.3.4 When Free a Girl provides content to third-party media professionals and agencies, the content must be in line with the above-mentioned guidelines, including following informed consent procedures around publication and full credits and captions. Free a Girl as the supplier of the content is responsible for the use of this content.

2.3.5 No payments or form of compensation are to be provided to children or parents in exchange for their interview, photo or consent.

3. Programs and partners

3.1 Local partner organisations

3.1.1 As part of the new partner intake process and assessment criteria Free a Girl will request a Child Safeguarding Policy from the partner. If the policy of the partner is inadequate and not in line with international norms, Free a Girl should advise on ways to improve the policy and provide support where necessary. Organizations cannot become a partner organization until there is an adequate Child Safeguarding Policy in place.

3.1.2 All local partner organizations are required to agree to and sign Free a Girl's Child Safeguarding Policy. This Child Safeguarding Policy will be part of the partner intake process of Free a Girl and referred to in the Grant Agreement Documents.

3.2 Program development, planning and monitoring and evaluation

3.2.1 Program officers should pay attention to child safeguarding risks and concerns in program development, planning, development, monitoring and evaluation and advise project partners where necessary on effective implementation of Child Safeguarding policies and compliance with international norms.

3.2.2 All program proposals from local partner organizations or where Free a Girl is a partner should address how child safeguarding risks in project activities are taken into account.

3.3 Staff travel and field trips

3.3.1 For child safeguarding guidelines on staff travel, including for field trips, see Free a Girl's Travel Security Policy.

3.3.2 Prior to any travel where there is contact with children, Free a Girl employees and visitors (not formally employed by Free a Girl) are expected to review expectations for the trip, including reading, agreeing to and signing this Child safeguarding Policy and the Code of Conduct. The visitor provides a signed copy of the Code of Conduct to Free a Girl prior to each visit (unless there are multiple visits per year, in which case the Code of Conduct only needs to be submitted once a year).

3.3.3 Ensure that anyone representing Free a Girl, such as ambassadors or other guests, who are working or visiting children or a community involved with Free a Girl's work, are introduced by an employee of Free a Girl or local partner organization.

3.4 Research

3.4.1 When Free a Girl conducts research that uses methods involving children it is important to consider the way in which the children would be involved, the possible benefits and disadvantages of their involvement, and other ethical concerns.

3.4.2 Involving children in the research is important. This can be done in many ways:

- i. Giving feedback on research design (and consider how you will incorporate this).
- ii. Conducting the research (participatory/peer-to-peer research).
- iii. As a respondent; research with children can include asking children about their feelings and experiences through for example face-to-face interviews, questionnaires or focus group discussions, including asking their parents; observing children's behaviour; and reviewing information from case stories and records about children.
- iv. As a proof-reader of results, meeting notes, conclusions, recommendations.

3.4.3 A risk assessment is performed by the Free a Girl staff member coordinating the research, which includes analysis of internal and external risks and mitigating measures. If a local partner organization or other external organization is contracted to do the research, this organization must read and sign the child safeguarding policy and perform a risk assessment. This risk assessment is reviewed by Free a Girl for any improvements to ensure it is in line with the Child Safeguarding Policy. It is important that external organizations are aware of the risks and privacy, confidentiality and consent matters related to working with children and Free a Girl.

3.4.4 Consent forms must be filled out by children and adults who are involved in the research.

3.4.5 Children participating in the research remain anonymous and their names and families should not to be identified.

3.4.6 Children participating in the research are fully aware of the objectives of the research and its potential use and dissemination.

3.4.7 A clear set of criteria is developed that explains why certain children are involved or not involved in the research, and this should be appropriately communicated to the children.

3.4.8 Research participants should be appropriately reimbursed for any expenses, compensated for effort, time or lost income, and acknowledged for their contribution, including through for example, transport, accommodation, food, interpreters, space, materials, rewards/ payments where appropriate, and staff time. Ensure there is sufficient budget to carry this out.

3.4.9 Research data is kept safe and securely stored – strategies for this are outlined in the research proposal and risk assessment.

D. RESPONSE MECHANISMS

4. Identifying concerns

4.1 Concerns about suspected, witnessed, reported or potential harm, abuse or exploitation of a child/children can be identified by a staff member(s), visitors or another child/children in a project.

4.2 If there are suspicions, doubts or signs of harm, abuse, or exploitation of a child/children within Free a Girl and organizational level activities, it is important to respond promptly and adequately, in line with this Child Safeguarding Policy. Suspicions can be reported to the Integrity Adviser via integrity@freeagirl.com. Free a Girl takes all concerns seriously with the aim of safeguarding children from any harm, abuse or exploitation.

4.3 If there are suspicions, doubts or signs of harm, abuse, or exploitation of a child/children within a project partner or local partner organization, then the child safeguarding and reporting procedures of the organization in question must be followed. The management of the project partner should always inform Free a Girl about the case and the steps that the management of the project partner has taken to deal with it via integrity@freeagirl.com

Responding

4.4 Free a Girl strives to support children, staff or any other person raising concerns. Free a Girl takes concerns raised seriously and listens to the views and wishes of the children and persons involved, and where appropriate, Free a Girl is obliged to report concerns to relevant external bodies.

4.5 The reporting procedure is as follows;

- i. If someone has an allegation, disclosure, suspicion or feels a sense of discomfort regarding possible harm, abuse or exploitation of a child or children within Free a Girl or the organization's direct activities, then he/she should promptly and without delay report to the Integrity Adviser, who is an external person from the Board.
- ii. When the allegation, disclosure, or suspicion regarding possible harm, abuse or exploitation of a child or children occurs in a project implemented through a project partner of Free a Girl, the reporting procedure and response mechanism of the project partner should be followed. The management of the project partner should always inform Free a Girl about the case and the steps that the management of the project partner has taken to deal with it. If for some reason, reporting the management of the project partner is not possible, concerns can also directly be reported to Free a Girl via integrity@freeagirl.com
- iii. The details of the concern should be put in writing by the Integrity Adviser, who will inform the director exactly how it was reported without embellishing facts or making assumptions, so that there is a record kept on file.
- iv. If the concern involves director, the Integrity Adviser should go to the next most appropriate person, i.e. the Child Safeguarding Representative or the Board.
- v. Upon being informed, the Board and/or the Child Safeguarding Representative inform the Human Resources Manager and Board of the concern raised. The Board and/or Child Safeguarding Representative then monitor the situation closely and confidentially.
- vi. The Board and/or Child Safeguarding Representative take immediate action to make sure the child in question is safe.
- vii. The Board and/or Child Safeguarding Representative then begin the investigation to gather facts and information for making informed decisions on reasonable grounds. The investigation should involve interviewing the person(s) in question and witnesses privately to ascertain their side of the story, and the interviewees should be informed of the potential consequences of the reporting and investigation process.
- viii. The Board and/or Child Safeguarding Representative must determine through a risk-assessment of the harm posed to the child, harm experienced by the child and if the action of the suspected person is a reportable allegation, and then contact where appropriate the local police and social services for assistance or to report the allegation.
- ix. During the investigation if any form of abuse is proven or suspected Free a Girl must endeavor to provide assistance to the child or children and support them with any effect they are experiencing, including for example counselling or any other form of assistance.

4.6 When concerning a staff member, the following is considered:

- i. Where the concern or suspicion is about a staff member including an employee, intern, consultant, volunteer, ambassador, or board member, the Board must inform the person in question verbally that charges have been made against him/her, the consequences of this and that an investigation is to take place. Where the concern or suspicion is about the Board, the Child Safeguarding Representative must inform them verbally that charges have been made against them, the consequences of this and that an investigation is to take place. The written confirmation and sanctions are sent by the HR department to the employee's home address.
- ii. When a staff member is the person against whom an allegation has been made, an internal investigation must take place.
- iii. It is generally inappropriate to inform the staff member in question before the investigation has commenced, nor should this be delayed as the person in question can obtain adequate support and procedural fairness in responding to the allegation.
- iv. The staff member should be given a chance to respond, including giving his/her side of the story.
- v. If following the investigation the allegation is unfounded, no action will be taken against the staff member.
- vi. If following the investigation the person against whom the concern has been raised has been found to have violated this Child Safeguarding Policy or the law, or the Board, must determine appropriate corrective or disciplinary action and remedial measures (e.g. counselling, training), or immediate termination of employment for the staff member.
- vii. All investigation and decision-making processes must be documented in writing and kept on file ensuring that there is a record of how the reporting and responding process has led to the final decision.

- viii. In some cases, the Board, Child Safeguarding Representative, staff members and others have the obligation to report the case to the relevant authorities or external bodies, for example the local police, child protection or social services bodies. This may occur after the reporting procedure or if there is an immediate and urgent risk posed the relevant authorities may be contacted earlier.
- ix. The responsibility for investigation allegations of child abuse rests with the relevant authorities or external bodies. The Board or Child Safeguarding Representative can seek (legal) advice from these relevant authorities or external bodies in deciding whether to make a formal referral. A clear rationale for the decision must be recorded in writing. The decision not to submit a formal referral must be unanimously agreed by the Supervisory Board and the Child Safeguarding Representative.
- x. The Child Safeguarding Representative must also inform the person who reported the matter about the outcome of the investigation, including the reasons why action was or was not taken.
- xi. The Child Safeguarding Representative, together with the communication officer, develop a media plan to manage inquiries about the concern with a designated spokesperson.

E. IMPLEMENTATION, MONITORING AND EVALUATION OF THE POLICY

5. Implementation

5.1 The Child Safeguarding Representative is responsible for coordinating the development of systems and the day-to-day implementation of this policy in Free a Girl, as well as promoting its implementation and a child-safe environment.

5.2 The Child Safeguarding Representative is responsible for ensuring that all staff members are aware of the policy and the associated responsibilities, and working with the Manager HR, Finance & Operations to ensure that the policy is referenced and integrated into human resources policies.

5.3 The Child Safeguarding Representative works with the Program officers to reference the policy in all program documents, including but not limited to the partner intake assessment forms, reporting templates, partnership documents and Grant Agreement Documents.

6. Monitoring and evaluation

6.1 The Child Safeguarding Representative monitors that all awareness trainings of staff members and signed codes of conduct are documented and archived.

6.2 Any reports, concerns and allegations as well as the ensuing actions and processes are documented and securely archived, so that lessons learned and best practices can be collected and analyzed.

6.3 The implementation of the policy in human resources, communications and programs is constantly monitored to check adherence, challenges, and impacts.

6.4 The Child Safeguarding Representative develops a monitoring and evaluation framework to assess the implementation and effectiveness of this policy.

Annex I: GLOSSARY (Child Safeguarding Policy and Code of Conduct)

1. CHILD

A "child" is defined as anyone under the age of 18, in line with the UN Convention on the Rights of the Child.

2. CHILD ABUSE

Refers to all forms of physical and/or emotional ill treatment and neglect, 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.²

3. CHILD SEXUAL ABUSE

The involvement of a child in sexual activity that he or she does not understand or is unable to give informed consent to or is not developmentally prepared to give consent to, or that violates the laws and social taboos of society.³ This can occur between a child and closely related family member (incest) or between a child and an adult or another child who by age or development is in a position of responsibility, trust or power.⁴ It involves either explicit force or coercion or, in cases where consent cannot be given by the victim because of his or her young age, implied force.

4. SEXUAL EXPLOITATION OF CHILDREN (SEC)

Sexual exploitation of children involves the exploitative use, inducement or coercion of children in any unlawful or psychologically harmful sexual activities, including in prostitution, sexual slavery, sexual exploitation in travel and tourism, trafficking for sexual purposes, forced marriage, and pornographic performances and audio and visual materials. SEC can be defined as sexual abuse of a child by an adult with remuneration in cash or kind to the child or a third party or parties. The child is treated as a sexual and commercial object. The remuneration factor distinguishes SEC from child sexual abuse where commercial benefit is apparently absent. SEC involves coercion and violence against children and the main forms of SEC are sexual exploitation of children, online child sexual abuse material and child trafficking for sexual purposes, all of which are interconnected.⁵

5. CHILD PROTECTION

Protective measures, policies, standards and procedures to protect children from intentional or unintentional harm; including to prevent and respond to all forms of violence, exploitation, abuse, neglect and maltreatment against children.

6. IDENTIFIABLE CHILD

A child whose identity is likely to be revealed by showing all or part of their face or their body, or particular surroundings.⁶

7. INDIRECT CONTACT WITH CHILDREN

This refers to:

- Having access to information on children, such as children's names, locations (addresses of individuals or projects), photographs and case studies.
- Providing funding for organizations that work 'directly' with children. Albeit indirectly, this nonetheless has an impact on children, and therefore confers responsibility upon the donor organization for child safeguarding issues.

² ECPAT International.

³ World Health Organization, 1999. Report of the Consultation on Child Abuse Prevention. Geneva, 29–31 March. Document WHO/HSC/PVI/99.1. Available at: http://apps.who.int/iris/bitstream/10665/65900/1/WHO_HSC_PVI_99.1.pdf.

⁴ Ibid.

⁵ The Stockholm Declaration and Agenda for Action, Adopted at: First World Congress against Commercial Sexual Exploitation of Children, Stockholm, Sweden, 27–31 August 1996; Article 34 of the United Nations Convention on the Rights of the Child (UNCRC). (1989).

⁶ Article 19 of the United Nations Convention on the Rights of the Child (UNCRC). (1989); Defence for Children International Netherlands – ECPAT Netherlands. (2016). *Child Protection Policy*.

8. STAFF

All persons working with Free a Girl, including board members, program and administrative staff, volunteers, interns, consultants, ambassadors and other representatives of the organization. Similarly, staff members extends to all those carrying out activities both paid and unpaid, on behalf of Free a Girl.

Annex II: Child Safeguarding Code of Conduct

Free a Girl recognizes that as a child rights organization it has a moral and legal responsibility to ensure that children are safe when they are in the organization's care – directly or indirectly. We are committed to defining and upholding the highest standards of behaviour at all times, both inside and outside the work environment. To this end, the statement below applies to all staff members, including board members and employees, consultants and visitors, local partner organizations and all others who come into contact with children through or facilitated by Free a Girl.

Bearing in mind that:

- Free a Girl is a child rights organization that fights the sexual exploitation of children;
- Free a Girl provides resources and support to organizations working directly with victims of sexual exploitation of children and forced prostitution; and
- Every staff member is in a position of responsibility, trust, and authority.

I will

1. Abide by this Child Safeguarding Policy, the Code of Conduct and the responsibilities set out.
2. Treat all children with respect regardless of race, gender, ethnicity, class, religion, political view, disability etc.
3. Be visible when working with children as far as possible, including meeting with a child in a location that he/she prefers that is public location as far as possible.
4. Be aware of the power balance between an adult and a child and avoid taking any advantages this may provide.
5. Act on children's concerns / problems immediately.
6. Wait for appropriate physical contact such as holding hands, to be initiated by the child.
7. Ask for informed consent of the child before taking photographs or video footage, following the conditions set out in section 2. Media and Communications of the Child Safeguarding Policy.
8. Advise the Child Safeguarding Representative if I am involved in any situation where my actions could be misinterpreted or bring the organization into disrepute.

I will never

1. Spend time with any child connected to Free a Girl's programs outside of work requirements.
2. Use inappropriate language around or make sexually suggestive comments or actions to a child, young person or other vulnerable person, even as a joke.
3. Spend time alone with a single child or young person with whom I have a work relationship with, away from others, behind closed doors or in a secluded area.
4. Discriminate, show favoritism or spend excessive amounts of time with one child with whom I have a work relationship.
5. Share confidential information about a child and/or his/her family unless for a good reason and to ensure the protection of the child.
6. Publish content that features children involved with Free a Girl, or invite children to link up on, personal social media accounts.
7. Engage in activities involving close body contact with a child, young person or vulnerable person with whom I have a work relationship, beyond work requirements.
8. Hit or otherwise physically assault or abuse a child.
9. Hold, kiss, cuddle or touch a child, young person or other vulnerable person with whom I have a work relationship in an inappropriate and/or culturally insensitive way.
10. Shame, humiliate, belittle or degrade a child or vulnerable person or otherwise emotionally abuse a child or vulnerable person.

11. Exchange money, employment, goods or services for sexual favours and services, regardless of the age of the secondary individual, and regardless of the legality of the exchange.
12. Marry or engage in any form of sexual relations with any person below the age of 18 years, or abuse or exploit a child.
13. Have any personal involvement in, *inter alia*, the viewing, possessing, producing or distributing of online child sexual abuse material; child sex tourism; trafficking of children; and any other form of sexual exploitation.
14. Conduct or be part of harmful traditional practices, spiritual or ritualistic abuse.

Non-compliance with the above shall be taken seriously. This will involve a thorough investigation and referral of cases to the police and/ or social services if national or international child rights laws have been violated. Where applicable non-compliance can lead to immediate termination of employment, partnership contract and/or involvement in the organization.

I, the undersigned, hereby have read and understand Free a Girl's Child Safeguarding Policy and Code of Conduct, and I agree to complying with the standards and responsibilities outlined.

Name:

Signature:

Date and Place:

ANTI-FRAUD AND CORRUPTION POLICY FOR PARTNERS

Free a Girl has a strict zero tolerance policy on fraud of any type or in any circumstances, whether carried out by persons associated with Free a Girl (Board Members, management, staff or volunteers) or associated with partner organizations, contractors or clients. Fraud against Free a Girl depletes funds intended for the accomplishment of program delivery, undermines effective functioning and jeopardizes sustainable development by diverting donor contributions. Fraud in favor of Free a Girl affects our reputation and ability to attract donations. Vigorous and prompt investigations will be carried out into all reported cases (complaints) of actual or suspected fraud.

1. Definition of Fraud/corruption

Abuse of data, resources or services a person has at their actual disposal for the performance of a duty for the benefit of Free a Girl, resulting from their employment with Free a Girl, or for the performance of duties or the supply of goods. For the purposes of this policy, fraud shall include, but not be limited to:

- a) Theft or misappropriation of Free a Girl's assets.
- b) Submitting false claims for payment or reimbursement.
- c) Accepting or offering a bribe, or accepting gifts or other favors under circumstances that might lead to the inference that the gift or favor was intended to influence an employee's decision-making while serving Free a Girl.
- d) Accepting a commission from, or paying same to a third party (kickbacks).
- e) Blackmail or extortion.
- f) "Off book" accounting, or making false or fictitious entries.
- g) Knowingly creating and/or distributing false or misleading financial reports.
- h) Payment of excessive prices or fees where justification thereof is not documented.
- i) Violation of foundation procedures with the aim of personal gain or to the financial detriment of Free a Girl.
- j) A dishonorable, or irresponsible, or deliberate act against the interest of Free a Girl.

2. Prevention and Monitoring

Partner organizations: are expected to prevent and combat fraud and corruption in Free a Girl supported projects. Possible actions include:

- Taking all appropriate measures to prevent fraud and corruption on the project, such as maintaining appropriate fiduciary and administrative arrangements.
- Raising awareness, making sure that the Anti-fraud and Corruption Policy is made available to project staff.
- Reporting allegations of fraud and corruption in connection with the use of grants from Free a Girl and cooperating with Free a Girl investigations.
- If fraud or corruption does occur in a Free a Girl supported project, taking timely and appropriate action to address the problem.

Free a Girl: For the execution of projects and programs, Free a Girl enters into license agreements and specific grant contracts with partner organizations. These agreements and contracts record the specific obligations of the partner organization to Free a Girl.

- Monitoring is carried out through financial reports, narrative reports and annual visits to the offices of partner organizations and actual project sites.



- Free a Girl makes use of the external audit of partner organizations if applicable.
- In addition, the program officer(s) can provide extra monitoring with regard to fraud.
- A specific project or program audit can also be carried out, as stipulated in the grant contracts.

3. How to handle fraud

The person first confronted with a case of (suspected) fraud shall report this immediately to the executive director and the finance manager of the partner organization or directly to the Integrity Adviser of Free a Girl via integrity@freeagirl.com

1. The executive director of the partner organization will notify the Integrity Advisor of Free a Girl in writing of the (suspected) fraud via integrity@freeagirl.com. Free a Girl is entitled to:
 - Suspend the execution of the entire agreement, verbally and in writing with a detailed explanation;
 - Stop immediately all payments or advances to the partner organization;
 - Call for compensation for loss or damage through legal proceedings;
 - Expect a total clarification before resumption of the payments can be considered.
2. After receiving a report and recommendations from all the parties concerned Free a Girl will decide on whether the relationship with the partner organization should be terminated or, after improvement measures have been taken, can still be continued.
3. Conditions set by Free a Girl for continuation of the relationship could be:
 - The full extent of the damage is determined by Free a Girl or a third party;
 - The incidents are reported to the local authorities;
 - Partner organization demonstrably improves the internal organization and monitoring;
 - Parties involved in the fraud will be suspended or fired.

GENERAL CODE OF CONDUCT

PURPOSE

The Code of Conduct aims to ensure that our Staff (including board members, employees, consultants, visitors and local partner organisations) and Associates treat each other and the children, young people and communities that we work with, with dignity and respect. Free a Girl recognises that as a child rights organisation it has a moral and legal responsibility to ensure that children are safe when they are in the organisation's care – directly or indirectly. We are committed to defining and upholding the highest standards of behaviour at all times, both inside and outside the work environment. Free a Girl's Code of Conduct is therefore designed to provide clear guidance to our Staff and Associates for conducting themselves in a manner which is consistent with their role and commitment to our values, and to provide examples of conduct that will always be unacceptable. Our Code of Conduct is designed to ensure compliance with related policies, full disclosure of suspected or alleged breaches of the expected standards of conduct, and to maintain the professional standing of the organisation so that we can achieve our mission.

This Code should also be read and understood in conjunction with the following associated policies, as may be amended from time to time:

- Anti-Fraud and Corruption Policy (one for Free a Girl staff and one for local partners)
- Child Safeguarding Policy
- Whistleblowing Policy
- Sanctions policy

GUIDELINES (not exhaustive)

I. I will respect others

I will:

1. Respect the rights of all people without discrimination.
2. Always act fairly and honestly and will treat people with dignity and respect.

I will not:

1. Take part in any form of discrimination, harassment, bullying, humiliation or abuse (physical, sexual or verbal), intimidation or exploitation, or in any other way infringe the rights of others.

II. I will work actively to safeguard the rights of children and young people

I will:

1. Be open and honest in my dealings with children and young people, their families, and communities participating in programmes.
2. Be aware of the power balance between an adult and a child and avoid taking any advantages this may provide.
3. Wait for appropriate physical contact such as holding hands, to be initiated by the child.
4. Create and maintain an environment which prevents the abuse and exploitation of children and young people ensuring that I am aware of potential risks with regards to my conduct and work, and take appropriate action so as to minimise risks to children and young people.
5. Act on children's concerns/problems immediately.



6. Ask for informed consent of the child before taking photographs or video footage, following the conditions set out in section 2. Media and Communications of the Child Safeguarding Policy.

I will not:

1. Spend time (alone) with any child connected to Free a Girl's programmes outside of work requirements.
2. Use inappropriate language around or make sexually suggestive comments or actions to a child, young person or other vulnerable person.
3. Marry or engage in any form of sexual/physical relations with any person below the age of 18 years.
4. Discriminate, show favouritism, shame, humiliate, belittle, degrade hit or otherwise physically assault a child or vulnerable person or otherwise emotionally abuse a child or vulnerable person.
5. Share or publish confidential information about a child and/or his/her family unless for a good reason and to ensure the protection of the child.
6. Have any personal involvement in, *inter alia*, the viewing, possessing, producing or distributing of online child sexual abuse material; and any other form of sexual exploitation.
7. Abuse or exploit a child or young person or behave in any way that places a child or young person at risk of harm, including through traditional practices such as female genital mutilation and child, early or forced marriage.

III. I will maintain high standards of personal and professional conduct

I will:

1. Abide by the Anti-Fraud and Corruption Policy, the Child Safeguarding Policy, the Code of Conduct and the responsibilities set out.
2. Advise the Integrity adviser if I am involved in any situation where my actions could be misinterpreted or bring the organisation into disrepute.

I will not:

1. Pursue personal or family gain or advantage in my dealings with or on behalf of Free a Girl.
2. Accept bribes, significant gifts, favours of financial value or other services offered as a result of my employment with Free a Girl or in respect of our help, goods, or services of any kind.
3. Enter into any business relationship without authorization from my manager.
4. Drink alcohol or use any substances in a way that adversely affects my ability to do my job or affects Free a Girl's reputation.
5. Possess or profit from the sale of illegal goods or substances.
6. Use Free a Girl's computer equipment, mobile phones, video and digital cameras or other equipment to view, download, create or distribute inappropriate material, including but not limited to material which is pornographic, defamatory, abusive, sexist, racist or otherwise exploitative.
7. Exchange money, employment, goods or services for sex, including sexual favours or any other forms of humiliating, degrading, or exploitative behaviour.
8. Release any private or confidential information relating to Free a Girl or its Staff, Associates or beneficiaries to others unless it is a requirement of my job or I am legally required to do so.

IV. I will report any concern or incident reading to this Code of Conduct

I will:

1. Report any matter which appears to break the standards contained in the Code of Conduct or associated Policies that I witness or I am made aware of to the or Integrity adviser, using the relevant and/or country specific procedures as set out in the Whistleblowing Policy.
2. Support any investigation into suspected, alleged or known breaches of this Code, including as a witness.
3. Advise the Integrity if I am involved in any situation where my actions could be misinterpreted or bring the organisation into disrepute.

I will not:

1. Withhold any relevant information.
2. Undertake any action on my own that is not in line with local policies and procedures and/or, without guidance from relevant focal points and managers.

IMPLEMENTATION AND MONITORING OF THE CODE

The Integrity adviser is responsible for ensuring the implementation and monitoring of the Code of Conduct. In case of non-compliance to the above Staff can report at integrity@freeagirl.com. Failure to adhere to Free a Girl's Code of Conduct and the standards of behaviour it promotes and requires could result in disciplinary action (including, potentially, your dismissal or termination of all relations with Free a Girl including contractual and partnership agreements). The actual sanctions will be dependent on the severity of the violation(s) of the rules and policies. In some cases the matter may be so serious that it will lead to criminal prosecution or we may choose (and in some cases be obliged) to report to any relevant professional or government authorities. Please refer to the Whistleblowing Policy and Sanctions Policy for further information.

STATEMENT OF AGREEMENT

I, the undersigned, hereby have read and understand Free a Girl's General Code of Conduct, Anti-Fraud and Corruption Policy and Child Safeguarding Policy and its Code of Conduct, and I agree to complying with the standards and responsibilities outlined.

Name:

Date and Place:

Signature:

SANCTION POLICY

1. To whom do the regulations apply

This policy applies to all employees, volunteers and consultants who work for Free a Girl, both in the USA and abroad. This policy also applies to (employees of) all our partner organizations and others who have a signed a contract with Free a Girl.

2. Sanctions for violation of the rules – employees

If an employee acts contrary to the conditions of the employment contract, Code of Conduct, Anti-Fraud and Corruption Policy or Child Safeguarding Policy, Free a Girl will:

1. Provide written or verbal warning (of which a confirmation is sent to the relevant employee).
2. Make a note in the employees file.
3. Hold the employee accountable for the damage caused (both physical as financial).

The actual sanctions will be dependent on the severity of the violation(s) of the rules and policies.

In case of a breach of the Child Safeguarding policy or the Anti-fraud and Corruption policy, Free a Girl will also:

4. Withhold the employees wage.
5. Put the employee on hold while he/she is under investigation.
6. Discharge the employee with possibility of a legal action such as prosecution.

Again, the actual sanctions will be dependent on the severity of the violation(s) of the rules and policies.

3. Sanctions for violation of the rules- external partners

If a partner organization behaves contrary to the conditions of the employment and or partner contract, Code of Conduct, Anti-Fraud and Corruption Policy, or Child Safeguarding Policy, Free a Girl will:

1. Contact the partner organization, verbally and in writing.
2. Stop payments to the partner organization immediately.
3. Cancel the contract with the partner organization immediately.

Call for compensation for loss or damage through legal proceedings.

After corrective action, the relationship with the partner organization can be continued when:

- The damage has been repaired by the partner organization;
- The partner has reported to the police;
- The partner has taken steps to improve the organization internally;
- Persons involved have been suspended or dismissed by the partner organization.



4. Who imposes

The Director imposes the verbal warning. The written confirmation and sanctions are sent by the HR department to the employee's home address. Where the concern or suspicion is about the Director, the Board imposes the verbal warning.

Written contact with the partner organization is made by the Director

5. Appeal and objection

If an employee objects to a sanction, he/she can address the HR department in writing within 10 working days. After a fair hearing, a reasoned written decision will be issued within 10 working days after treatment. Treatment does not suspend the sanction.

WHISTLEBLOWING POLICY

Introduction

This policy is implemented in order to encourage and enable whistle-blowers to report on misconduct as soon as possible in the knowledge that they are able to do so without fear of intimidation, harassment, retaliation, reprisals, discrimination, or adverse employment consequence because of such report. With this policy we want to assure that staff and Associates of Free a Girl and local partner organizations, including children, young people and communities they work with, have the ability and confidence to report any (suspicions of) breaches of Free a Girl's standards of conduct as set out in the General Code of Conduct, the Anti-Fraud and Corruption Policy or the Child Safeguarding Policy.

Reporting (a suspicion of) non-ethical behaviour is seen as contributing to the functioning of Free a Girl as well as the transparency and accountability of the organisation. It is therefore important that whistle-blowers report as quickly as possible.

Free a Girl Whistleblowing procedures provide, at a minimum:

- a) The possibility to make a (anonymous) notification to the Integrity Adviser;
- b) Guidance to Whistle-blower(s) on how to report Whistleblowing Concerns, including reassurance that their confidentiality and, if desired, anonymity will be respected to the extent permitted by law;
- c) The prompt and proper investigation of all Whistleblowing Concerns to a consistent standard;
- d) A means for responses to recommendations made in Whistleblowing investigation reports; and
- e) The retention of all records of reported Whistleblowing Concerns and Whistleblowing investigations on a strictly confidential basis for the required periods.

Article 1 Application and Scope

1.1 This policy applies to all the Staff members and Associates of Free a Girl (hereinafter referred to as employee), and to local partner organizations, and offers them the opportunity to report on (suspected) misconduct of an ethical, operational or financial nature.

Article 2 Availability

2.1 This policy is available to all employees and local partner organizations. In addition, this policy is placed on the website of Free a Girl.

Article 3 General Provisions

3.1 Every employee is expected to report a (suspicion of) misconduct. A report must be made within a reasonable period but no longer than 13 weeks after taking notice of the misconduct. The notifier has the right to a confidential treatment. In Article 6 of this regulation the procedure which states the guarantee of confidentiality is included.

3.2 This regulation does not apply to complaints of a personal nature. Such complaints must always be discussed with the management team of Free a Girl

3.3 The notifier does not act out of personal gain. If there are deliberate false notifications, the notifier may receive a sanction.



Article 4 Registration point

- 4.1 The registration point is a selected person who acts as first point of contact for the notifier(s). The registration point, who is the Integrity Adviser, is an external person who is not involved in the day to day business of the organization
- 4.2 This person is responsible for conducting investigations in response to the report and reports annually on the reports made and the subsequent results.
- 4.3 Notifications can be made to the Integrity Adviser via the following email address: integrity@freeagirl.com

Article 5 Record-keeping

- 5.1 The Integrity Adviser creates a confidential file for each report. All registrations and files are kept in a secured environment. The identification details of the notifier are stored in such a way that only the Integrity Adviser has access to it.
- 5.2 On annual basis the registration point makes a report of the incoming reports.
- 5.3 In this report statements are made about:
 - The number and nature of the reports made;
 - The number of reports that didn't lead to an investigation;
 - The number of investigation that have been carried out;
- 5.4 This report will be made public in the annual report of the organization.

Article 6 Procedure

- 6.1 The employee, Associate, local partner organization, including children, young people and communities they work with, or other person reports on a (suspected) misconduct verbally or in writing as soon as possible, but at least 13 weeks after being notified.
- 6.2 The Integrity Adviser records the report with the date on which it was received in writing.
- 6.3 The Integrity Adviser investigates whether the report is admissible.
- 6.4 The Integrity Adviser informs the Director
- 6.5 If the report concerns the director the Integrity Adviser informs the Board
- 6.6 Immediately after reception of a report the Integrity Adviser and/or the Director initiate an investigation. They can approach persons who are able to provide information regarding the report.
- 6.7 During the investigation, the identity of the notifier is not disclosed and the necessary data will be objectified in such a way that the identity of the notifier cannot be derived out of the information.
- 6.8 The report is set aside if the investigation does not reveal any reason to believe that the report is true. The notifier will be informed of this.
- 6.9 Violation of regulations will be reported. This report also states which actions will be taken. The Integrity Adviser will also inform the reporter of the measures taken.
- 6.10 The investigation and settlement must be carried out within a period of eight weeks, after the first report. If the investigation and settlement of an incident cannot take place within eight weeks, the reporter will be notified by the Integrity Adviser and will indicate the period within he/she can await the outcome of the investigation and the settlement of the incident.

Article 7 Legal protection and privacy

- 7.1 An employee or other person who has reported a (suspicion of) misconduct will not be disadvantaged in any way as a result of reporting. The same applies to the person to whom the report relates until proven guilty.
- 7.2 Reprisals, expressions or behaviour of colleagues in a negative respect towards the reporter, as a result of reporting, are not accepted by Free a Girl and will always lead to sanctions.
- 7.3 As long as the employee does not state otherwise, the anonymity desired by him/her will be respected in accordance with the procedure, as set out in Article 6 (see above), to the extent permitted by law.

Article 8 Final provisions

- 8.1 The reporting files that have been declared inadmissible or unfounded will be destroyed five years after closure. Other reporting files are destroyed after internal processing or after (external) legal proceedings have been completed.
- 8.2 The person about who a report has been made has the right to inspect the file (with the exception of personal data) - before a decision has been made on his/her position - to correct any inaccuracies and to prepare his/her defence.