



# GOAL Child Protection Policy (CPP)

**January 2018**

# GOAL Child Protection Policy (CPP)

<b>Clients:</b>	All GOAL staff, including all GOAL Head Office and Field staff, all GOAL entities' Boards of Directors, consultants, secondees, interns, volunteers, visitors, implementing partners, contractors, donors, and vendors.
<b>Title:</b>	GOAL Child Protection Policy (CPP)
<b>Document type:</b>	Policy
<b>Classification:</b>	General Distribution
<b>Authors:</b>	Tim Malcomson PhD, Child Protection Advisor, GOAL (Version #3) Frederic Baele, Child Empowerment and Protection Advisor, GOAL (version #4)
<b>Owned by:</b>	Board of Directors, Senior Management Team, General Manager
<b>Reviewed and approved by:</b>	Keeping Children Safe (GOAL is a member of this network of organisations); Audit & Risk Committee: December 2017; Board of Directors: January 2018

**Next review date:** May 2020

**History of policy review:**

- 2004: Original Policy and Procedures document drafted
- 2005: Main text reviewed & edited
- Oct 2007: Procedures were separated and annexed to main text
- Apr-May 2010: Development of Annex 7
- May-Jul 2010: Development of Annex 6
- Sept 2010: Annexes 4 and 5 reviewed and edited
- Jan 2011: Annexes 1, 2 & 3 developed
- Aug-Oct 2012: Support CPFP Manual developed with 7 support tools
- May 2013: Review of policy and draft design for a popular version of these policy and Procedures Toolkit documents
- April-June 2015: Review of policy and annexes; harmonisation of tools with Keeping Children Safe toolkit (Self-Audit, reporting procedures, handouts for trainings); e-learning module on CPP
- Dec. 2016- Jan. 2017: Review of the annexes, harmonization with CRM processes
- Apr-Jul 2017: Review of the CPP (version #4)

## Table of Content

Page 04	1.	Introduction
Page 05	2.	Purpose
Page 06	3.	Scope
Page 07	4.	Definitions & Acronyms
Page 08	5.	Policy Statement
Page 08	6.	Responsibilities
Page 09	7.	Reporting
Page 10	8.	Training and Communication
Page 10	9.	Non-compliance
Page 11	10.	Related policies and procedures
Page 12		Annex 1: Sign Sheet for all Staff
Page 13		Annex 2: Reporting And Responding To Suspicion Or Disclosure Of Sensitive Case
Page 14		Annex 3: Protection Report Form

# 1. Introduction

As an organisation working with children, both directly or indirectly, GOAL has a moral and legal responsibility and a duty to protect children within our care from both intentional and unintentional harm. GOAL believes that all staff need to be aware of our policy and commitments in relation to child protection even though the majority of staff may never have unaccompanied contact with children or young people through their work. It is not possible to eliminate risk entirely, but we are obliged to develop strategies and mechanisms to reduce the risk.

GOAL believes that as an NGO working for vulnerable children's rights we have an absolute duty to protect this already vulnerable group from abuse, mistreatment, and exploitation from within organisations and environments intended for their benefit. This duty is imperative and non-negotiable. Without adequate standards and mechanisms of protection in place, an organisation is not only failing in its primary duty of care, but may also be negligently or recklessly fostering an environment of abuse.

GOAL bases its Child Protection Policy on 6 principles:

- a. **Best interests of the child**, the welfare of the child is the paramount consideration. Actions taken to protect a child, including assessment, should not in themselves be abusive or cause the child unnecessary distress. Every action and procedure should consider the overall needs of the child.
- b. **Child rights**, GOAL's child protection policy is firmly based on the principles of the UN convention on the rights of the child. A child rights-based approach puts children at the centre of work intended for their benefit and involves them as actors in their own protection and development.
- c. **Child participation**, Children have a right to be heard, listened to and taken seriously. Taking account of their age and understanding, they should be consulted and involved in all matters and decisions which may affect their lives. Children have much to contribute through a clear understanding of their own situations and ways in which they can be supported to protect themselves. Creating spaces where children feel able and willing to speak out about abuse, free from abusers, empowers them to become involved in their own protection without further discrimination or shame. Children will only benefit from this policy if they are aware of their rights and are given the proper environment in which to exercise them.
- d. **Accountability**, GOAL has identified the importance of leadership with clear lines of accountability, without ambiguity about who is responsible at every level, especially for the health, well-being and safety of vulnerable children.
- e. **Transparency**, Transparency breaks down cultures of silence, taboo, secrecy and fear in which child abuse thrives. Transparency and the space and opportunity to talk freely create a preventive and protective environment for children. Silence breeds abuse and exploitation of children. Transparency in dealing with incidents is required, whilst maintaining the confidentiality.
- f. **Commitment**, child protection is not just about reading and signing a piece of paper: the policy sets out guidelines and standards that must be put into practice. Above all, it must be remembered that it is the children, not the standards, that are sacrosanct; and although abuse must never be tolerated, the standards are no more than a tool in the service of promoting the welfare of children.

## 2. Purpose

As an organisation with a specific focus on vulnerable children it is our duty to ensure that our promotion of children's rights includes specifically protecting children from accidental harm as well as deliberate abuse within organisations intended for their benefit. This policy will assist in fulfilling this duty.

Organisations without protection policies, guidelines and systems are more vulnerable to false or malicious accusations of abuse. Without proper policies, guidelines and procedures in place, allegations of abuse, whether founded or unfounded, can destroy an organisation's reputation. This will have serious implications for fundraising, potentially undermining an organisation's entire portfolio of work, even beyond the scope of the particular project concerned.

The CPP aims at:

1. Preventing abuse where possible by setting in place and implementing systems and procedures to protect children through best recruitment practices, staff induction and training, creating an open and aware culture, assigning clear management responsibilities and involving children appropriately in their own protection.
2. In the event of disclosure or discovery of abuse; setting in place clear guidelines and procedures for reporting and reacting, dealing promptly and properly with incidents, supporting victims and holding perpetrators to account.
3. Creating a child safe organisation, an environment where issues of child protection are discussed openly and are understood between children and adults, where concerns can be brought to the attention of the relevant people, that improve awareness and implementation of child protection policies and practices, and which creates a framework to deal openly, consistently and fairly with allegations concerning both direct and indirect abuse.

All GOAL staff are bound by the policy. Children with whom GOAL works either directly or through partners are involved appropriately in the implementation and monitoring of the implementation of the policy. All visitors to GOAL projects are expected to uphold the policy. All partner organisations are, over time, expected to comply with minimum standards defined by the policy.

The advantages of having a CPP are:

- Children are protected, although no policy or guidelines can offer complete protection for children, following this policy minimises the risk to children of abuse and exploitation.
- Staff and representatives are protected, by implementing this policy all staff and representatives will have clear guidance on their own behaviour around children and what to do if they are told of or notice inappropriate behaviour on the part of others.
- The organisation is protected, by implementing the policy GOAL is making clear its commitment to safeguard children. The policy is a tool to enable us to move towards best practice in this area and to deter those who would wish to abuse from joining the organisation.

### 3. Scope

#### GOAL Staff, board members, interns, secondees and volunteers

GOAL staff are bound to the commitment not only to abide by, but also to understand and promote the policies, guidelines, principles and practice of child protection in a child rights context. It is crucial that GOAL staff uphold the highest standards of professional and ethical behaviour while working with GOAL, because the actions of the staff members reflect the principles of the organisation. When we talk of staff we mean:

- Head Office staff;
- Overseas staff, both international & local;
- Interns/volunteers and secondees, both international & local; and
- The Board of Directors.

All Field Offices will progressively be expected to comply with GOAL's child protection standards supported by head office. Each field must develop country specific guidelines on child protection based broadly on the GOAL standards set out in the Policy Procedures Guidelines: Recognizing, Reporting and Responding, and its eight associated annexes, and GOAL's Child Protection Focal Person's Manual, and its associated annexes.

#### Partners, contractors, consultants and service providers

Any organisation with which GOAL enters into a direct implementation relationship is bound by GOAL's Child Protection Policy and guidelines. In time they will be:

- Expected to identify and name a senior individual within the organisation who will be held accountable for reading GOAL's Child Protection Policy and signing, on behalf of the organisation, the relevant 'Statement of Commitment'.
- Expected to provide GOAL with the name of a contact person within the organisation for communication on child protection issues.
- High risk partners with existing child protection policies of their own will be expected to submit a copy of the policy to GOAL's Child Protection Advisor to check compliance with GOAL's essential minimum standards outlined in Annex 6. GOAL will then either issue a letter confirming GOAL acceptance of the policy, or enter into dialogue with the organisation concerned to negotiate any changes that may be required in order to bring the policy into compliance with GOAL's essential minimum standards.
- Medium to high risk partners (i.e. whose staff have programmatic contact with accompanied and unaccompanied children) without existing child protection policies of their own will be expected to develop their own child protection policy. This should conform to GOAL's essential minimum standards. Transitionally, they may adapt GOAL's own Child Protection Policy for their own use, ensuring that any adaptation still conforms to GOAL's essential minimum standards. This, and other child protection commitments should be made contractual but may also require that GOAL supports the partner in their implementation.

All Partners will progressively be expected to comply with GOAL's child protection standards (see Annexes 6), supported by the capacity building commitment outlined in this policy and to adhere to GOAL's country specific guidelines.

## Individuals on project visits

Anyone travelling overseas either as a representative of GOAL, or where GOAL is responsible for that person, e.g. donors, journalists and researchers, and who will have direct or indirect contact with children during the project visit, will be:

- Expected to receive a specific briefing on arrival in country from the designated child protection person to include Code of Behaviour, use of information etc.
- Expected to uphold the Code of Behaviour.
- Depending on the level of contact with children expected they may be expected to sign the statement of commitment to GOAL's Child Protection Policy and a personal declaration stating any criminal convictions, investigations or allegations made against them with respect to child protection issues.
- There will be no unsupervised access to children for individuals on project visits.

## 4. Definitions & Acronyms

**Child:** GOAL defines children as those under the age of 18. GOAL recognises that some communities will consider individuals younger than 18 as adults. Country programmes should ensure they are informed of local variations and assess how these may impact on the implementation of the policy.

**CPP:** Child Protection Policy.

**Child Abuse:** According to the World Health Organisation, "Child abuse" or "maltreatment" constitutes 'all forms of physical and/or emotional ill-treatment, sexual abuse, neglect 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.' NSPCC similarly specify "cruelty to children" or "child abuse" as 'behaviour that causes significant harm to a child. It also includes when someone knowingly fails to prevent serious harm to a child. All forms of cruelty are damaging - it can be harder to recover from the emotional impact than from the physical effects.'

The 4 categories of abuse are generally defined as:

- **Physical abuse:** Physical abuse is any form of non-accidental injury or injury which results from wilful or neglectful failure to protect a child. Examples include hurting or injuring a child, inflicting pain, poisoning, shaking or otherwise causing physical harm to a child.
- **Sexual abuse:** Sexual abuse occurs when a child is used by another person for his or her gratification or sexual arousal, or for that of others. This includes direct or indirect sexual exploitation or corruption of children by involving them (or threatening to involve them) in inappropriate sexual activities.
- **Emotional abuse:** Emotional abuse is normally to be found in the relationship between a care-giver and a child rather than a specific event or pattern of events. It occurs when a child's need for affection, approval, consistency and security are not met. Emotional abuse, for example, happens when a care-giver repeatedly rejects children, humiliates them, frightens them or denies their worth and rights as human beings.
- **Neglect:** the persistent failure to meet a child's basic physical and physiological needs. Neglect can be defined in terms of an omission, where a child's health safety, development or welfare is being avoidably impaired by being deprived of food, clothing, warmth, hygiene, intellectual stimulation, supervision and safety, attachment to and affection from adults or medical care.

## Who abuses?

A person may abuse a child by inflicting harm or failing to prevent harm. Children can be abused in a family, community or institutional setting. More often than not the abuser is known to and trusted by the child. Those who wish to abuse come from all sectors of society. Children also abuse other children.

A child sex-abuser, even if not working directly with children, may be attracted to working with an international NGO because the job provides him or her with access to children locally in the country of operation. The cloak of respectability provided by working for an INGO can provide greater access, increased opportunity and decreased chance of detection or prosecution.

## 5. Policy Statement

GOAL recognises the rights of all children within our care to be protected from harm in accordance with the United Nations Convention on the Rights of the Child (CRC). GOAL takes seriously its duty of care. It undertakes to create an organisation that is safe for children where all efforts are made to prevent abuse. GOAL sees the best interests of the child as paramount.

Child protection is about protecting children from intentional and unintentional harm within organisations intended for their benefit.

## 6. Responsibilities

The global responsibility for managing this policy lies with GOAL's Child Protection Advisor and the HR Manager in GOAL's Dublin Head Office, supported by the Policy Working Group.

At country level, each Country Director has the responsibility for implementing the policy in full. Each Country Director appoints a designated Protection Officer (PO) or Protection Focal Person (PFP)<sup>1</sup> in their country of operation who will be the key contact in any disclosure or suspicion of abuse and will be responsible for the training and induction of staff in child protection issues.

Job descriptions drafted by line managers must assess the level of contact with children and risks the future recruit may present. Human Resources must adequately mention GOAL's commitment to Child Protection during recruitment. The recruiting officer must take full consideration of the level of contacts with children the new employee will have and assess candidates accordingly.

The Compliance and Internal Auditor must confirm that the procedures and protocols are in place to limit risks.

The GOAL of Directors will receive and consider the yearly self-audit report and progress made.



## 7. Reporting

### What to do if you witness or suspect a wrong-doing

It is the obligation of all GOAL staff and related personnel to raise any concerns or suspicions they have, actual or perceived, of any breach of the GOAL Child Protection Policy by any colleague or supplier/implementing partner/vendor. GOAL employees and related personnel may avail of GOAL's Whistleblowing Procedure for doing so (see GOAL Whistleblowing Policy) or they may discuss the incident with their Line Manager if they feel comfortable doing so.

All GOAL country programmes have a focal point trained in handling sensitive issues arising from an actual or perceived breach of the GOAL Child Protection Policy. Guidelines to responding to such breaches are found in Annex 3. Tools related to reporting and case management are found in Annexes 4 and 5.

If a country programme focal point is made aware of any actual or perceived breach of the GOAL Child Protection Policy they may seek support from the Global Protection Advisor.

When made aware of an alleged breach of the GOAL Child Protection Policy, GOAL will:

- Take appropriate action to the best of its capacity to protect persons from retaliation when allegations of child exploitation and abuse are made in good faith.
- Investigate allegations of child exploitation and abuse involving GOAL staff and related personnel in a timely and professional manner, and to the best of its capacity encourage all designated stakeholders to do the same.
- Use appropriate interviewing practices with complainants and witnesses, particularly with children. Engage professional investigators or secure investigative expertise as appropriate.
- Take swift and appropriate action, including legal action when required, against employees and related personnel who commit sexual exploitation and/or abuse.
- Take swift and appropriate action against those who were aware of such abuse/exploitation but did not report it.
- Support survivors of child exploitation and abuse through the complaints process, including but not limited to medical assistance, if required.

At every GOAL office, GOAL must confirm that:

- Reporting lines on how to report concerns are displayed in an accessible location for all employees. This display must contain the contacts of all focal points, the Complaint and Response Mechanism and bodies responding to Whistleblowing.
- See annex 2 for all the contacts that should be displayed

Protection Advisor:  
protectionadvisor@GOAL.ie

Complaints Response Director:  
speakup@GOAL.ie

## 8. Training and Communication

Effective child protection requires compulsory training and clarity of responsibility for personnel working with children. GOAL understands the need for capacity building on issues of child protection and appreciates the constraints and conditions under which we operate. GOAL is committed to undertake such capacity building. CPP is a compulsory part of all induction.

## 9. Non-compliance

Any concern or suspicion regarding Child Abuse or a breach of the GOAL CPP, at any level is treated with the utmost seriousness by GOAL. Upon learning of a suspicion or disclosure of abuse by a GOAL employee or related person, the organization will place any alleged perpetrator(s) on paid leave, with immediate effect. GOAL will ensure confidentiality of the case and protection of the parties to the disclosure.

The disciplinary actions are detailed in GOAL's HR manual and include investigation into gross misconduct and breach of policies. In absentia, the reference manual is GOAL Head Office employee handbook.

During the investigation (see Annex 3) the suspected staff member(s) will receive normal compensations. The investigation may lead to:

- Dismissal of the case: the investigation finds that the accusation is not based on any facts and all allegations are unfounded. The employee returns to his or her post.
- Confirmation of the case: the investigation confirms facts and suspicion. The employee's contract is terminated. If not already done so; GOAL will alert the relevant authorities in-country.
- Remaining Doubts: the investigation cannot prove the abuse but estimates that there are grounds for significant doubt and suspicion. The disciplinary measure will be adapted to the level of suspicion and the gravity of the accusation.

GOAL appreciates that cases of child abuse or exploitation can be exceptionally difficult to discover and/or prove. Survivors of child abuse and exploitation often face enormous social and cultural barriers to reporting any abuse or exploitation. In many cases alleged perpetrators may wield power or position over their victims, and/ or live in close proximity to them. GOAL recognises that these factors may interfere with any investigation into cases of child abuse or exploitation.

GOAL also recognises the significant damage that can be caused by malicious, unfounded accusations. If staff are proved to have made malicious allegations, disciplinary action will be taken accordingly as per GOAL employee handbook, section 5.1.

## 10. Related policies and procedures

The GOAL CPP is linked to and must be read in conjunction with:

- GOAL Code of Conduct
- GOAL Gender Equality Policy and Strategy
- GOAL PSEA and Anti Trafficking Policy
- GOAL Risk Management Policy
- GOAL Employee Handbook
- GOAL Whistleblowing Policy

As local laws and customs differ widely across the world, the GOAL CPP is informed by the UN Convention on the Rights of the Child, and best practice guidelines from the humanitarian sector (including GOAL's own policies and experience). It applies regardless of location and local law<sup>2</sup>.

The GOAL CPP is also in line with the following:

- IASC Minimum Operating Standards; Protection from Sexual Exploitation and Abuse by own Personnel (2012)
- Keeping Children Safe, standards and practices (2015)
- The Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and Non-UN Personnel, August 2008
- The Core Humanitarian Standard (CHS) on Quality and Accountability<sup>3</sup>.

A list of all GOAL's active policies can be found on the Policies and Guidelines page on GOAL's intranet.

### Support Toolkit Associated with implementation of this policy:

Annex 1: Flow Chart Of Reporting Child Abuse And Neglect

Annex 2: Names And Contact Details For Reporting And Responding To Abuse And Neglect

Annex 3: Reporting And Responding To Suspicion Or Disclorure Of Sensitive Case

Annex 4: Protection Report Form

Annex 5: Protection Case Follow-Up Form

Annex 6: Child Protection Risk Self-Assessment Tool

Annex 7: Child Protection Self-Audit Tool

Annex 8: Child Protection Code Of Behaviour

Annex 9: Guidelines On Cp And Human Resource Management (+ Annexes)

Annex 10: Media Guidelines

Annex 11: Check Up For Compliance And Internal Audit (Under Review)

## Annex 1: Sign Page For All Staff

I acknowledge receipt of the GOAL Child Protection Policy and Procedures.

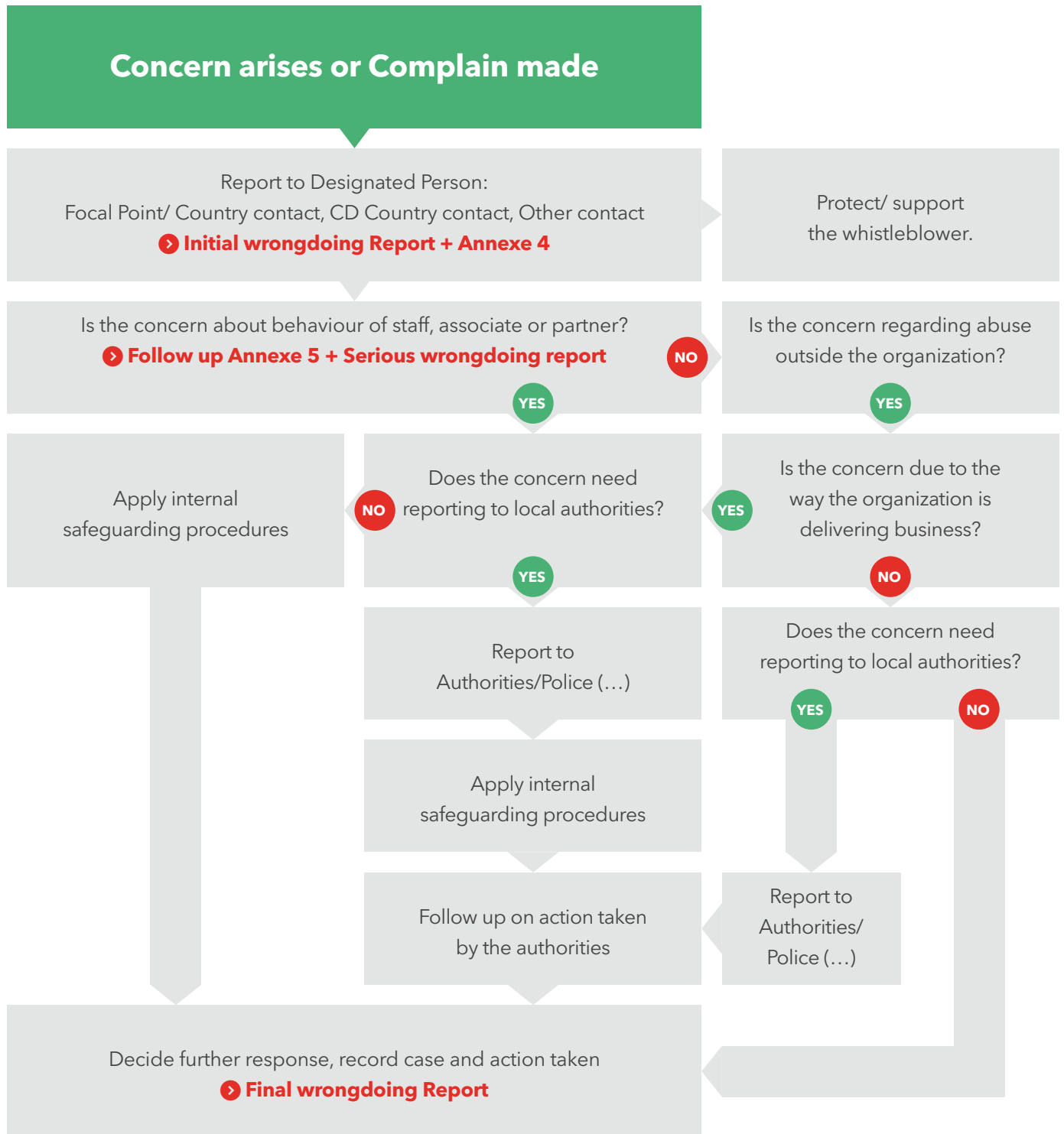
I have read the policy; I understand it and I accept the contents therein as part of my conditions of employment with GOAL.

Name:

Signature:

Date:

## Annex 2: Flow Chart Of Reporting Child Abuse And Neglect



## Annex 3: Protection Report Form

This report is to be used as a tool to develop the most un-biased information based report possible. This report complements the initial serious wrongdoing report, in case of sensitive concern related to possible breach of the PSEA, CPP, anti-trafficking policies. Concerns reported in this annex are specific to harm, abuse (physical, sexual, emotional), exploitation, involvement in human trafficking, discrimination and neglect by someone related to GOAL (employee, volunteer, consultant/visitor, partner, contractor) against someone related to GOAL (employee, volunteer, beneficiary/ member of the population, partner,...).

- a. If you have knowledge that a person's safety might be in danger, please complete this form to the best of your knowledge. All information and details are relevant, do not be afraid to include all the detail you can think of and remember. If you need additional space to include all the detail, please use a separate piece of paper. Sign and date this additional paper. For confidentiality reasons, the report should be written and signed solely by you.
- b. Once the report is completed, you must communicate directly with the most senior manager in the organisation and the Protection advisor within 24 hours (preferably within the same working day). It will be held in a safe and secure place and treated in the strictest confidence.

### Protection Report Form

Case number:

#### 1. About you

1.1 Your name: 1.2

Your job title:

1.3 Workplace:

1.4 Your relationship to the alleged victim:

1.5 Your contact details:

1.6 Have you discussed this concern with any other person: If so, who?

#### 2. About the alleged victim

2.1 Alleged victim's name:

2.2 Alleged victim's gender:

2.3 Alleged victim's age:

2.4 Alleged victim's contact details:

2.5 Is this alleged victim involved in one of GOAL's programmes?

Continue overleaf 

### 3. About the concern

3.1 Was abuse suspected or witnessed?

3.2 Is this concern based on first hand information or information divulged to you by someone else? (if so, who?)

3.2 Did the alleged victim disclose abuse to you? If so, describe in detail what the alleged victim said to you, how the alleged victim presented/ looked when talking to you.

3.3 Are there any witnesses to the situation? (if so, who)

3.4 Context of the alleged incident:

3.5 Location of the alleged incident:

3.6 Name of alleged perpetrator:

3.7 Is the perpetrator a beneficiary, staff member, or visitor?

3.8 Residence of alleged perpetrator:

3.9 Title of alleged perpetrator:

Continue overleaf 

3.10 Nature of the concern//What type of event are you concerned about, that would raise suspicion on abuse:

3.11 Your personal observations.  
N.B. make a clear distinction between what is fact and what is opinion or hearsay

3.12 Exactly what the alleged victim or other source said to you (if relevant) and how you responded to him or her (record actual details)

3.13 Any other information not previously covered:

3.14 Were there any other beneficiaries involved in the situation?

3.15 Were there any other parties involved in the situation?

3.16 Action taken/What did you do?:

Signed:

Date: