

IMPACT Shaping practices
Influencing policies
Impacting lives



CHILD PROTECTION POLICY

Version 2 | 2021

CONTENT

CONTENT.....	2
I. INTRODUCTION	3
A. Policy statement.....	3
B. IMPACT's child protection principles	5
1. Awareness	5
2. Prevention.....	5
3. Action in case of policy violation.....	5
II. INTERPRETATION AND APPLICATION	6
Article 1 – Scope of Application	6
Article 2 – Definitions.....	6
Article 3 – Information and adherence to the Policy	8
Article 4 – Purpose of the Policy.....	8
III. GENERAL PRINCIPLES	9
Article 5 – Neutrality	9
Article 6 – Impartiality	9
Article 7 – Confidence of stakeholders.....	9
Article 8 – Hierarchical responsibility.....	9
Article 9 – Confidentiality.....	9
Article 10 – Protection of privacy	9
Article 11 – Information held	9
Article 12 – Responsibility of line managers	10
IV. CHILD PROTECTION MECHANISM	10
Article 13 – Importance of prevention.....	10
Article 14 – Prevention and identification mechanisms.....	10
Article 15 – Prohibition of all forms of child ill-treatment or negligence.....	11
Article 16 – Behaviour to be followed in case of child ill-treatment or negligence.....	11
Article 17 – Photographs of children	12
Article 18 – Obligation to report for IMPACT staff	13
Article 19 – Report to stakeholders	13
Article 20 – IMPACT investigation in case of internal reporting.....	13
Article 21 – IMPACT investigation in case of reporting by a stakeholder	14
Article 22 – Investigating authority.....	14
Article 23 – Sanction for child ill-treatment or negligence	14
V. IMPLEMENTATION OF THE POLICY	15
Article 24 – Implementation date of the policy.....	15
Article 25 – Adherence to the Policy	15



I. INTRODUCTION

IMPACT Initiatives (hereafter referred to as 'IMPACT') is a Swiss based Association and a sister organisation of ACTED. Independent, private and non-profit, IMPACT 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.

IMPACT is committed to shape practices and influence policies in humanitarian and development settings in order to positively impact lives of people and their communities. IMPACT aims to enable better and more effective decision making by generating and promoting knowledge, tools and practices for humanitarian and development stakeholders.

The commitment of IMPACT is guided by the following four core values:

- **Responsibility:** we contribute to the efficient and responsible delivery of aid with the means and the resources that have been entrusted to us.
- **Impact:** we are committed to promoting better aid practices and policies to support 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

IMPACT is committed to respecting the highest standards in terms of efficiency, responsibility and transparency in its activities. To this end, IMPACT'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 IMPACT staff and the other entities referred to in Article 1 of this policy, and must be considered together with:

- IMPACT's Code of Conduct;
- IMPACT's Grievance Policy;
- IMPACT's Child Protection Policy;
- IMPACT's Conflict of Interest Prevention Policy;
- IMPACT's Anti-Fraud, Bribery & Corruption Policy;
- IMPACT's Policy Against Sexual Exploitation and Abuse;
- IMPACT's Data Protection Policy;
- IMPACT's Anti-Terrorism and Anti-money laundering Policy;
- IMPACT's Environmental Safeguarding Policy;
- IMPACT's procedures, manuals and handbooks;
- Code of Conduct for The International Red Cross and Red Crescent Movement and NGOs in Disaster Relief, of which IMPACT 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, IMPACT recognises that children within the communities with which IMPACT 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.

IMPACT is aware that its programmes, particularly in emergency and disaster situations, can create an imbalance in the relationship between those employed by or associated with IMPACT and direct or indirect beneficiaries of its programmes. IMPACT recognises that this power imbalance can be exploited and instrumentalised.

This Child Protection Policy demonstrates IMPACT's commitment to protect children within the framework of its internal procedures, and in particular for the implementation of activities involving children and the mainstreaming of this issue in all its interventions.

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

This policy has been developed so that the best interests of the child can be systematically taken into account by IMPACT 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 IMPACT 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 Organisations (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.

IMPACT 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.¹ These principles are:

- 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 refer to any physical and/or psychological form of ill-treatment, sexual abuse, negligence, abandonment or negligent treatment, exploitation, including commercial exploitation, 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.

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



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

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

B. IMPACT's child protection principles

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

1. Awareness

- Training: As part of its recruitment, IMPACT will ensure that its staff and partners are trained on the Code of Conduct, the Child Protection Policy and the reporting of all forms of violations. Whenever updates are prepared, sessions are organised to ensure that IMPACT staff is aware of any update and best practices regarding child protection.
- Staff directly involved in child-related activities will receive additional technical and specialised 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: IMPACT 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 is accessible, are not entitled to be in direct contact with children as part of an IMPACT programme. Serious criminal activities include, among others: murder, sexual offences, offences and convictions for aggravated assault and battery, indecent behaviour, abduction crimes, crimes related to child prostitution or child pornography.
- Selection of partners and subcontractors: IMPACT 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 finalisation and signing of service or supply contracts.
- Strict application of IMPACT's Code of Conduct: all IMPACT staff and those of partner organisations 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 behaviours violating the requirements of this policy are reported to IMPACT, IMPACT 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, IMPACT 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 IMPACT 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, IMPACT will take disciplinary measures as well as any other action adapted to the facts and circumstances.

II. INTERPRETATION AND APPLICATION

Article 1 – Scope of Application

1. The policy applies to all IMPACT 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 IMPACT.
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 IMPACT'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 World Health Organisation (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 exploitation of a child. Prostitution and child trafficking for sexual abuse 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 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 labour:** Child labour 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 Labour Organisation, Convention 138). Part-time child labour is permitted from the age of 15, except for activities that could in any way impede the child's access to education or development. IMPACT applies a minimum age of 18 years.
- 4. **IMPACT Staff:** Under the terms of this policy, the term "IMPACT staff" refers to any person employed by IMPACT. The interns and volunteers of IMPACT 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 Member elected by decision making bodies to participate in IMPACT's managerial and administrative governance bodies. In particular, IMPACT's Committee Administrators 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 from, in any way, the actions, programmes and activities of IMPACT.
 - 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 IMPACT'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 IMPACT, 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 IMPACT, whether for a fee or not.

Article 3 – Information and adherence to the Policy

1. This policy is published under the authority of IMPACT. IMPACT 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. IMPACT 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 IMPACT staff, must ensure that staff is aware of and commits to the full respect of this policy.
3. It is the responsibility of IMPACT 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 IMPACT 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. IMPACT 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 IMPACT 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 IMPACT 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 IMPACT staff and the other entities referred to in Article 1 of this policy.



III. GENERAL PRINCIPLES

Article 5 – Neutrality

IMPACT 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, IMPACT 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.

Article 7 – Confidence of stakeholders

IMPACT 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 IMPACT's values of integrity, impartiality and efficiency and contributes to strengthen the confidence of all stakeholders.

Article 8 – Hierarchical responsibility

IMPACT 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, IMPACT 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 IMPACT 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, IMPACT 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 IMPACT.
2. IMPACT 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. IMPACT 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. IMPACT 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, IMPACT 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. IMPACT staff in charge of supervising or managing other IMPACT staff must do so in accordance with the policies and objectives of IMPACT. 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. IMPACT staff tasked with supervising or managing other IMPACT 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 relevant 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.

IV. CHILD PROTECTION MECHANISM

Article 13 – Importance of prevention

1. IMPACT staff and the other entities referred to in Article 1 of this policy, shall be sensitised to children's rights. To this end, IMPACT ensures that training is provided to IMPACT staff on the IMPACT 's Code of Conduct, this policy and, specifically, about the need to report any form of child ill-treatment or negligence.
2. IMPACT 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. IMPACT 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, IMPACT is faced with the most diverse cultures and belief systems, IMPACT fully upholds principles of freedom of speech and of protection of victims. As such, IMPACT has developed mechanisms that can contribute to prevent child ill-treatment or negligence such as:
 - Signing of the Code of Conduct by IMPACT staff in order to clarify unacceptable behaviour and in particular child ill-treatment or negligence; Provision of information to IMPACT stakeholders on relevant reporting mechanisms (including through the Complaints and Response Mechanism -



- CRM²) to ensure that IMPACT teams maintain a respectful dialogue with beneficiaries; Implementation of trainings and awareness sessions in order to train and empower IMPACT 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 IMPACT partners by carrying out due diligence, particularly with regard to their ethical commitments and past behaviours.
2. IMPACT staff responsible for recruiting, monitoring or directing others employed by IMPACT must be careful to prevent the hiring or deployment of individuals likely to engage in inappropriate behaviour when in direct contact with children.
 3. IMPACT staff shall ensure that no IMPACT 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, as defined in this policy, and regardless of legal qualifications retained by national courts.
 4. As soon as IMPACT is aware of any person who has been convicted of, or registered on lists or registers, for offences of child ill-treatment or negligence, as defined in this policy and regardless of legal qualifications retained by national courts, IMPACT will not place the person in direct contact with children within the framework of IMPACT's programmes.
 5. Any IMPACT 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 IMPACT staff and the other entities referred to in Article 1 of this policy, directly or indirectly, voluntarily or involuntarily, to participate, organise 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 – Behaviour to be followed in case of child ill-treatment or negligence

1. In the case of IMPACT staff who witness child ill-treatment or negligence:
 - If IMPACT 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 have a direct contact with the perpetrator in order to end such behaviour, provided that the facts are not too serious to exclude such an approach.
 - If the inappropriate behaviour does not cease or if IMPACT staff is unable to address the perpetrator directly, he or she must report the facts in accordance with Article 18 of this policy.
 - 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 HQ Head of Human Resources must be informed. If appropriate, the line manager and/or the IMPACT Country Coordinator / Representative must also be informed of the facts in order to take appropriate measures and to conduct an internal investigation in a timely manner.
2. In the case of a stakeholder who witnesses child ill-treatment or negligence:

² In the framework of the global partnership between ACTED and IMPACT, all beneficiaries will be directed towards ACTED's CRM mechanisms in countries where ACTED hosts IMPACT's operations.



- If any stakeholder as defined in this policy believes that he or she is a witness or victim of the violation of this policy, he or she shall address the perpetrator directly in order to end such behaviour provided that the facts are not too serious to exclude such an approach.
- If the inappropriate behaviour does not cease or if the stakeholder is unable to address the perpetrator directly, he or she must report the facts in accordance with Article 19 of this policy.
- 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 HQ Head of Human Resources must be informed. If appropriate, the line manager and/or the IMPACT Country Coordinator / Representative must also be informed of the facts in order to take appropriate measures and to conduct an internal investigation in a timely manner.

Article 17 – Photographs of children

1. Taking and distributing pictures of children is not allowed for IMPACT staff in the framework of their professional duties.
2. Only persons duly authorised in writing by IMPACT's HQ Communication Unit can take photos of children in connection with IMPACT Programmes.
3. Authorised 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.
4. In addition, authorised 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 and written approval of IMPACT's HQ Communication Unit.
5. The use and publication online and print by IMPACT of any photo with a child in the image is made by IMPACT's HQ Communication Unit or after explicit written approval by IMPACT's HQ Communication Unit. IMPACT's HQ Communication Unit will only publish photos with children in the image accompanied by supporting documents as detailed above.



Article 18 – Obligation to report for IMPACT staff

1. IMPACT intends to respond/come up with an answer/bring an appropriate response to any child ill-treatment or negligence. To contribute towards this, IMPACT has designated a focal point via a specific email address grievance.geneva@impact-initiatives.org.
2. IMPACT staff who consider to be a witness of child ill-treatment or negligence which may be in violation of or contravenes to the present policy, must report it to their line manager and/or the IMPACT Country Coordinator / Representative and in any case through grievance.geneva@impact-initiatives.org.
3. IMPACT staff must report to their line manager and/or IMPACT Country Coordinator / Representative and/or the HQ Head of Human Resources and in any case through grievance.geneva@impact-initiatives.org any evidence, allegation or suspicion of child ill-treatment or negligence of which they are aware in or in the course of their duties. The investigation of the reported facts is IMPACT's responsibility, in accordance with the provisions of Article 20 of this policy.
4. If reporting to the line manager and/or the IMPACT Country Coordinator / Representative is not appropriate, IMPACT staff should report to the HQ Head of Human Resources and in any case through grievance.geneva@impact-initiatives.org.
5. IMPACT staff may use the Security Incident Reporting (SIR) format³ and/or the grievance form to report.
6. IMPACT must ensure that IMPACT 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.
7. Cases of misuse of complaint mechanisms may be subject to sanctions.

Article 19 – Report to stakeholders

1. IMPACT wants to support people who are witnesses or victims of violations of the present policy. To this end IMPACT 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 IMPACT.
2. IMPACT 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 20 – IMPACT investigation in case of internal reporting

1. In accordance with Article 18 of the present policy, IMPACT staff must inform their line manager and/or IMPACT Country Coordinator / Representative and/or the HQ Head of Human Resources and in any case at grievance.geneva@impact-initiatives.org in case of suspicion of child ill-treatment or negligence.
2. An e-mail response is sent by grievance.geneva@impact-initiatives.org upon receipt of the complaint. This answer:
 - details the process to be followed in cases of suspected child ill-treatment or negligence;

³ In the framework of the global partnership between IMPACT and ACTED, ACTED security and safety procedures and processes apply to IMPACT. This includes the use of SIRs, which will be addressed to relevant ACTED Security Focal Point, with IMPACT HQ in copy.



- requests, where appropriate, further clarification and evaluation of the complaint.
3. The management of the complaint is done either at the local level, at the national level, or at IMPACT headquarters depending on the seriousness of the reported facts. This evaluation is carried out by IMPACT headquarters upon receipt of the complaint on grievance.geneva@impact-initiatives.org.
 4. IMPACT staff must:
 - Cooperate in any investigation conducted by IMPACT;
 - Keep all records of any alleged involvement that may be required for an investigation;
 - Preserve the confidentiality of any allegation.

Article 21 – IMPACT investigation in case of reporting by a stakeholder

1. In accordance with Article 19 of this policy, stakeholders may report through the Complaints and Response Mechanisms any cases of suspected child ill-treatment or negligence.
2. A response via the Complaints and Response Mechanisms will be provided upon receipt of the complaint. 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 complaint.
3. IMPACT staff and other entities referred to in Article 1 of this policy must:
 - cooperate in any investigation conducted by IMPACT;
 - keep all records of suspected involvement in such cases that may be required in case of investigation;
 - preserve the confidentiality of all allegations.

Article 22 – Investigating authority

The Investigation team appointed by the Executive Director is in charge of investigating all child ill-treatment or negligence issues within IMPACT.

Article 23 – Sanction for child ill-treatment or negligence

1. **Disciplinary sanction**
The violation of the present policy, which constitutes in particular a violation of IMPACT'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**
IMPACT 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**
IMPACT 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.



V. IMPLEMENTATION OF THE POLICY

Article 24 – Implementation of the policy

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

This Child Protection Policy comes into effect after approval by IMPACT Committee on 1st May 2021.

Article 25 – Adherence to the Policy

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





CHILD PROTECTION POLICY IMPACT 2021

