



GUIDELINES FOR IMPLEMENTATION OF THE CEVI MANAGEMENT POLICY ON SAFEGUARDING

OVERVIEW

Purpose

1. Safeguarding children and clients living in the communities we serve is foundational to all CEVI activities. Central to everything we do is our commitment to do no harm to any child anywhere nor to clients living where CEVI has an area of operation. We uphold the best interests¹ of children as a primary consideration in all actions and decisions.
2. Safeguarding includes preventing, reporting, and responding to harm or abuse caused by CEVI staff and partners of children and clients living where CEVI operates.
3. CEVI is committed to continuous improvement of safeguarding efforts which emphasize the prevention of sexual exploitation and abuse (PSEA) and other forms of violence or harm. We abhor any misuse of power, status, or trusted position for any sexual or other exploitative purposes. We endeavor to tackle this root cause of abuse in our prevention and training efforts.
4. CEVI has zero tolerance towards incidents of violence or abuse against children or clients, including sexual exploitation or abuse, committed either by staff or others affiliated with our work. CEVI takes necessary actions to respond to any suspected or known instances of abuse. Incident responses are centered on the child or clients, prioritizing their interests.
5. This Policy continues to emphasize the unique vulnerabilities and special protection requirements for children, along with the importance of preventing sexual exploitation and abuse (SEA), in particular, among other forms of abuse of clients living where CEVI has an area of operation.

Scope

1. This Policy applies to all CEVI-covered areas, including but not limited to Branch Offices, Head Office, and all of its partners and network, as well as the Board of Trustees. References herein to "CEVI" shall be understood as including all of these entities, unless the specific language or context clearly indicates otherwise.
2. This Policy is focused on protecting all children anywhere from harm caused by CEVI staff and partners and protecting clients from harm caused by CEVI staff or partners as part of CEVI operation.
3. This Policy applies equally in emergency relief operations and other CEVI-led initiatives.

¹ Convention on the Rights of the Child, General Comment 14: http://www2.ohchr.org/English/bodies/crc/docs/GC/CRC_C_GC_14_ENG.pdf

Effective Date

This Policy will take effect on April 17, 2023.

Background

This Policy is grounded in CEVI's broader ministry mandates and adherence to Child and Client Protection Principle, which builds community capacity and strengthens local and national systems that protect children and clients.

This Policy continues to emphasize the unique vulnerabilities and special protection requirements for children, along with the importance of preventing sexual exploitation and abuse (SEA), in particular, among other forms of abuse of clients living where WV has an area of operation.

Retired/Related Policies

1. This Policy on Safeguarding expands upon CEVI's Child Protection Standards, in place since the year 2019, to cover communities with whom CEVI works, especially women and children, in one integrated policy.

Contextualization

1. CEVI Head Office is responsible for ensuring the development, implementation, and periodic review of contextualized safeguarding policies, which are to be consistent with the standards outlined in this document and in accordance with local laws (and which could consist of simply deciding to utilize this Policy as their applicable policy on safeguarding).
2. Branch offices may set stricter requirements in their local Safeguarding Policy implementation, as required by national law or context. In cases where safeguarding policies from multiple offices apply, the most stringent policy is followed.
3. CEVI Head office shall coordinate with World Vision Philippines in any national contextualization.

POLICY

I. Safeguarding Policies and Responsibilities

1. Development of Contextualized Safeguarding Policies: CEVI Head Office must contextualize the policy and update it at least every three years.
2. CEVI Staff, On The Job Trainees (OJT), Learners, Visitors, Board of Trustees, and other partners and network: CEVI equips all staff, learners, OJTs, visitors, and Board of Trustees, members to understand and perform their safeguarding responsibilities and obligations. CEVI also applies appropriate standards to external parties, including visitors, vendors/service providers, partners, and others affiliated within the industry network, to address safeguarding risks relating to their engagement with CEVI's work. Hereafter, the full range of people for whom all or some of this Policy are (either directly or through contractual arrangements) will be referred to as 'CEVI staff and/or partners'.

3. Signed Acknowledgement: All CEVI staff, learners, visitors, OJTs, and Board of Trustee members sign an acknowledgment that they know, understand, and will follow this Partnership Management Policy on Safeguarding. Signed agreements are kept on file by the relevant office. Individual staff or Vendors/Service Providers and Partners as defined below also acknowledge safeguarding policies, and these signatures are held by the Vendors/Service Providers or Partners.
4. Agreements with Vendors/Service Providers: Vendors/Service Providers engaged in contracts where they—or their employees or sub-vendors/service provider—may have access to children or clients in CEVI operations, or may have access to identifiable personal data about such children or clients, require the safeguarding language below (or language substantively the same) in their contract with CEVI. In addition, a copy of the Safeguarding Behavior Protocols must be attached to the contract. These requirements apply whether the Vendor/Service Provider is being paid for the services or is providing them for free ('pro bono'), and are irrespective of the duration of the contract.

'In the course of performing this contract, Vendor/Service Provider and Vendor/Service Provider's employee will ensure that:

- a. Any of their interactions with clients living where CEVI has an area of operation, with children, or with identifiable personal data about such persons, will comply with the attached CEVI Safeguarding Behavior Protocols, and with any other reasonable safeguarding measures that CEVI may specify;
 - b. Any incidents of harm or risk of harm to any child or to clients living where CEVI has a programming presence will be reported immediately to CEVI;
 - c. Any individuals with access to clients, to children, or to identifiable personal data about such persons, will have a current clean criminal background check for offenses against children or abuse of clients, to the extent permitted by law (evidence of which will be provided to CEVI upon request);
 - d. They do not use children for labor; and
 - e. These safeguarding obligations will be clearly communicated to, and acknowledged by, all staff who may have access to children or to clients living where CEVI has an area of operation, or to identifiable personal data about such persons, and will be extended in identical form to any sub-vendor/service provider (if any are authorized) engaged to perform this contract.'
5. Agreements with Partner Organizations: When engaging a partner for CEVI products and services or initiatives, CEVI must assess the capability of the Partner to fulfill safeguarding responsibilities, including the Partner's safeguarding policy, procedures, and implementation. CEVI must then either (a) approve or (b) develop a capacity-building plan and support the Partner to develop stronger safeguarding controls.
 - a. The agreement (whether referred to as an 'agreement', 'subgrant', 'Memorandum Of Understanding', or any other term) must specify that before the Partner begins any work on the project, CEVI will conduct this assessment and approve or support the Partner as appropriate.
 - b. The Partner can agree to follow CEVI's local Safeguarding Policy in carrying out the initiatives.
 - c. The agreement must ensure that any of the Partner's personnel working in the CEVI project will have a current clean criminal background check for offenses against children or abuse of adults, to the extent permitted by law (evidence of which will be provided to CEVI upon request).

6. **Training:** All CEVI staff, learners, visitors, OJTs, and Board of Trustee members, as well as partner staff or partner volunteers working within CEVI's area of operation, receive safeguarding training within 90 days from the start of employment or CEVI partnership.
 - a. CEVI staff, learners, visitors, and OJTs receive periodic refreshers or other safeguarding training at least once every two years thereafter. Board of Trustee members receive refresher training on re-election.
 - b. Staff who have specific safeguarding responsibilities as part of their role are required to undertake additional safeguarding capacity building, specific to their department. This includes:
 - P&C (e.g. recruitment, new staff orientation, misconduct disclosure scheme)
 - Communications (e.g. photo and video requirements when the subject is highly vulnerable)
 - Procurement (e.g. screening processes for contractors; applying Do Not Re-Engage when necessary)
7. **Safeguarding Staffing:** Every CEVI Head Office, and Area Office appoints a Safeguarding Lead/Focal Point to provide leadership to the implementation of this Policy.
 - a. The Lead/Focal Point has a mandate for direct access to the Executive Director (or Operations Director, or Crisis Management Team), and to the CEVI Safeguarding Focal Point, should he/she feel that safeguarding issues are not being addressed adequately.

II. Behavior Protocols

1. **Safeguarding Behavior Protocols:** CEVI staff and partners behave in ways that safeguard all children everywhere and clients living where CEVI has an area of operation, prevent sexual exploitation and abuse, and prevent any other intentional or unintentional harm to the people CEVI serves or works amongst.
2. Rules of behavior are based on local and culturally appropriate interactions (provided these meet or exceed the minimum protocols below) with children, members of the opposite sex, and other clients living in the area of operation, and are included in each contextualized Safeguarding Policy.

Acceptable Behavior of CEVI employees and partners:

- a. Create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of these Behavior Protocols;
- b. Are careful about perception and appearance in their language, actions, and relationships with children and with clients living where CEVI has an area of operation. Their behavior—including in person and on digital platforms, both online and offline— demonstrates respect for children and clients and their rights;
- c. Ensure that all physical and online contact with children and clients is appropriate in the local culture;
- d. Use positive, non-violent methods to manage children's behavior;
- e. Accept responsibility for personal behavior and actions as a representative of the organization;
- f. Are always accountable for their response to a child's behavior, even if a child behaves in a sexually inappropriate manner; staff and clients avoid being placed in a compromising or vulnerable position with children;

- g. Where possible and practical, follow the ‘two-adult’ rule while conducting CEVI work, wherein two or more adults supervise all activities that involve children and are visible and present at all times;
- h. Comply with safeguarding-related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation;
- i. Comply with applicable data privacy laws and with relevant CEVI data privacy and information security policies, including CEVI digital child safeguarding protocols, when handling any personal data about individual children or clients, and that such data must be maintained and transferred in a secure, confidential manner;
- j. Immediately report through established reporting mechanisms any known or suspected safeguarding incident or breach of this Policy by a CEVI staff or partner, or a humanitarian aid worker² from any other agency or organization.

Unacceptable Behavior – CEVI employees and partners do not:

- a. Behave in an inappropriate physical manner or develop a sexual relationship with a child (under 18 years old), regardless of the country-specific legal age of consent or age of majority. This includes consenting or condoning the above behavior (including fostering or condoning child marriage, i.e. under 18 years old). This also includes behavior that could be seen as grooming a child for a future inappropriate relationship;
- b. Develop or seek a sexual relationship with any client living where CEVI has an area of operation. Such relationships, based on inherently unequal power dynamics, undermine the credibility and integrity of CEVI’s work;
- c. Sexually exploit or abuse any client living where CEVI has an area of operation or any child;
- d. Exchange money, employment, goods, or services for sex (including sexual favors, other forms of humiliating, degrading, or exploitative behavior, or hiring sex workers) or other exploitative demands. This includes an exchange of assistance that is already due to the clients;
- e. Communicate with a child in CEVI’s area of operation via digital platforms (e.g. Facebook, Twitter), via mobile technology (e.g. texting, WhatsApp, Skype), or online without the consent and knowledge of his/her parents. Further, CEVI staff or partners never communicate on mobile, digital, or online platforms with children or clients in ways that are inappropriate or sexual;
- f. Fondle, hold, kiss, hug, or touch any child, or any client living where CEVI has an area of operation in an inappropriate or culturally-insensitive way;
- g. Use inappropriate or abusive language with a child nor an adult living where CEVI has an area of operation, for example, language that causes shame or humiliation, or is belittling or degrading;
- h. Spend excessive or unnecessary time alone with a child or a client, away from others or behind closed doors or in a secluded area;
- i. Condone or participate in behavior that is illegal, unsafe, or abusive; including harmful traditional practices, spiritual or ritualistic abuse;
- j. Hire children in any form of child labor (including as “house help”) unless it is within the best interest of the child and in alignment with local law and international standards (“Child labor’ is work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling. ‘Child work’ in contrast may be beneficial if it meets

²“Humanitarian aid worker” includes all paid employees, volunteers, contractors, and other affiliates of organizations providing emergency relief or development aid. Such organizations include UN agencies, INGOs, LNGOs, and CBOs.

International Labor Organization (ILO) Conventions and puts the child's interests ahead of any benefits gained by adults³);

- k. Hit or use other corporal punishment against a child while the child is in CEVI's care or the CEVI staff or partner is conducting CEVI work;
- l. Take a child alone in a vehicle for CEVI work, unless it is absolutely necessary, and with parental/guardian and managerial consent;
- m. Misuse or be careless with personal data about individual children or clients;
- n. Stay silent, cover-up, or enable any known or suspected safeguarding incident or breach of Safeguarding Policy by a CEVI staff or partner;
- o. Exchange inclusion in CEVI operations or benefits for any kind of favor from a member of the community, as this is an abuse of power.

The above list provides concrete examples but is not exhaustive of all behaviors that constitute a violation of this Policy.

3. Disciplinary Action: The following are grounds for discipline, up to and including termination of the employment or other affiliation with CEVI:
 - a. Failure to follow CEVI Safeguarding Behavior Protocols;
 - b. Failure to follow any other part of the CEVI Safeguarding Policy;
 - c. Other inappropriate behavior toward any children or any clients living where CEVI has an area of operation;
 - d. Failing to report a known or suspected safeguarding incident committed by a CEVI staff or partner; or
 - e. Interference with any investigation or inquiry into a possible policy violation.

Individuals who have been found to have breached this Policy may have "Do Not Rehire" placed on their personnel file. Partners and Vendors/Service Providers may have "Do Not Re-engage" placed on their file based on the nature of the case.

III. Recruitment

1. Screening: CEVI takes diligent measures to screen out all people who might seek to use CEVI to harm children or clients, or whose past actions indicate an unacceptable risk of such harm.
 - a. These measures include but are not limited to addressing safeguarding in job advertisements (when feasible), applications, interviews, and references. Safeguarding screening measures are applied to all candidates for employment, Board of Trustee members, visitors, OJTs, learners, and individual vendors/service providers who will have access to children or clients or to their identifiable personal data.
 - b. During the interview process, applicants are asked about previous work with children.
 - c. For references supplied by applicants, questions are asked regarding the suitability of the candidate to work with vulnerable clients and children or for a child-focused agency. Documentation of references is kept on file.
 - d. Screening of internal candidates includes reference checks and a review of their personnel file for any previous infractions while working with CEVI.

³ See ILO Conventions 182 and 138 and consult local legal counsel to determine appropriate parameters of 'child work' in your WV country office; include these details in your contextualized policy.

Note that major grant donors may have specific screening requirements for the work they fund, so relevant grant terms and regulations should be checked.

2. Identity and Criminal Background Checks: Candidates for employment, Board of Trustee members, visitors, learners, and OJTs—as well as personnel of vendors/service providers and partners—have an identification check and an appropriate criminal record/police background check, to the extent permitted by law, prior to employment or engagement with CEVI, and periodically thereafter as required by law or appropriate for the context. Formal Global Centre exemption approval is required for alternatives to police background checks in contexts where they are not feasible or trustworthy or lawful. People with a prior conviction for any crime against children or sexual exploitation or abuse against an adult are not hired or engaged by CEVI, to the extent permitted by applicable law, and in any case will not be placed in a position with access to children or clients, or to their personal data.

IV. Visits to CEVI Branches and Offices

1. Visitors: Visitors subject to this Policy include people going to CEVI field operations or meeting children at a cluster visit.
 - a. “Visitors” include partners, funders, service providers, and other delegations from within the network invited by CEVI staff.
 - b. Government officials or institutional donors (government, multilateral) based in the hosting country do NOT require Safeguarding clearance but are accompanied by a CEVI employee(s).
 - c. Unannounced visits to CEVI clusters or areas of operations are not permitted.
2. Visit Preparation: All visits should be pre-approved by the Head Office. The office sending the visitor conducts a police background check on the visitors prior to any field visit, where permitted by law.
3. Visitor Orientation to Safeguarding: Each CEVI Department is diligent to ensure that visitors uphold the relevant sections of this Policy. The following requirements apply to visitors who visit an area or cluster or have direct contact with clients in CEVI areas of operation.
 - a. Visitors from other World Vision offices who are employees or Board Members: The hosting office provides a brief orientation to any distinctive Safeguarding Behavior Protocols that apply in that context, as well as local customs regarding adult interaction with children. Employees and Board members do not need to resign the policy or behavior protocols
 - b. Visitors who are not CEVI staff or Board of Trustee Members: All such visitors are briefed on CEVI’s Safeguarding Behavior Protocols and Prevention of Harm in Communications by the sending office prior to the visit. Upon arrival, visitors receive a brief written or oral orientation and sign an acknowledgment of receipt of the protocols. The signed acknowledgment is kept on file by the hosting entity. Non-employee or Board visitors are accompanied by a CEVI staff when visiting projects.

V. Communications, Content, and Marketing

1. Dignity: CEVI takes care to ensure cultural sensitivity and restrictions for reproducing personal images are adhered to before photographing or filming a subject, and CEVI ensures images are

honest representations of the context and the facts. In all forms of communication, children and clients are treated and portrayed with dignity and not as helpless victims or in sexually suggestive poses.

2. Consent: Children and clients who are primary subjects of text, photo, video, audio, and/or data gathered on behalf of CEVI must provide informed consent, and have the right to withdraw their consent at any time for any reason. CEVI must be able to demonstrate that informed consent has been given, and have systems in place that allow CEVI to show that a request to withdraw consent has been respected.

Informed consent means the subject has a general understanding of the purpose of the content and gives verbal or written permission thereof. If the primary subject is a child, informed consent is also collected from the parent, guardian, or other legally required entity or individual.

In the following situations, verbal consent is not acceptable and written consent is collected to adult or the child's legal guardian:

- a. The sensitive nature of their personal disclosure or situation could possibly cause damage to their privacy, dignity, safety, or reputation, or
 - b. Where otherwise required by applicable law
3. Prevention of Harm in Communications: CEVI is committed to storytelling that raises awareness of and promotes solutions to ending violence and abuse against children and clients. CEVI takes the following steps to prevent harm through communications, content gathering, and marketing (including digital or offline photographs/videos/audio clips, stories, articles, or any other communication materials):
 - a. Personal information on children and clients that is captured, stored, or sent through electronic, online, or mobile devices is password protected. In addition, data is handled in accordance with CEVI's current information security standards for personal data, which may include encryption and other requirements.
 - b. CEVI ensures that relevant requirements for safeguarding are clearly communicated to all staff, visitors, vendors/service providers, and partners at the point of access to photographs, videos, or data, and that appropriate measures are taken for child-safe usage of the content once it has been shared.
 - c. Recognizing the special vulnerability of children, material posted on social media or digital channels mentions only the child's first name and country name and does not contain a child's family name, or child's personal location/address. In cases of sensitive subjects such as unaccompanied children or child sex workers among others, CEVI conceals the child's identity in images and uses a pseudonym.
 - d. Material with a child or children is not geo-tagged to precise locations if it contains any part of the child's name. An acceptable alternative is to retag photos with the child's first name only to the Branch Name or Cluster Name.
 - e. CEVI discourages direct, unfacilitated, undocumented communication through social media without CEVI's knowledge between a visitor and children and between staff/OJTs/learners/other CEVI partners.
 - f. Where CEVI facilitates communication between children and external parties, controls are put in place to protect children's safety and well-being.

- g. CEVI provides reporting and response options so that partners, visitors, children, or their caregivers can report any incident(s) where either party feels uncomfortable or threatened. CEVI websites, domains, and social media platform profile pages contain reporting options for child protection concerns or safeguarding incidents.
- h. The use of platforms to share marketing or communications content with no ability to track back evidence of informed consent and/or platforms that lack the ability to withdraw consent is forbidden. Only platforms that have been vetted by global or local CEVI IT are permitted for sharing content between offices or with donors/external parties.

VI. Safeguarding Incidents and Response Protocols

1. Responding to Safeguarding Incidents: CEVI is required to investigate and respond to reports of violations of this Policy and harm to children or clients in ways that are consistent with local law. CEVI uses three levels of Safeguarding Incidents to determine CEVI's response, which is based on the seriousness of the incident and CEVI's role. CEVI develop a Safeguarding Incident Preparedness Plan (SIPP) which defines response in line with local law and available services.
2. Level 1 Child Protection Community Incidents: Abuse of or harm to a child, in a community where CEVI has an area of operation and that is not committed by CEVI staff or partners, is a Level 1 Incident. CEVI Branch track and document Level 1 Incidents and respond according to their SIPP in cases of serious harm that threaten the child victim's survival, safety, or development.
3. Level 2 Safeguarding Incidents: Level 2 Incidents are defined as any violation of this Policy which puts any child anywhere or clients living where CEVI has an area of operation at direct risk of potential harm, but where no actual harm is believed to have occurred. CEVI Branch reports Level 2 Incidents to CEVI Safeguarding who then reports to WVI Safeguarding through IIM system within 24 hours of the first notice. The response is implemented by the oversight and accountability to the WVI Safeguarding and support from the CEVI Safeguarding Focal Team.
4. Level 3 Safeguarding Incidents: A Level 3 Incident is an allegation or accusation of harm or abuse to any child anywhere or clients living where CEVI has an area of operation by a CEVI staff or partner. If a child is involved, two additional types of incidents qualify death or serious injury of a child while participating in or at a CEVI activity or caused directly by a CEVI-related person, and/or a road traffic accident involving a CEVI vehicle or driver affiliated with CEVI in which a child is injured or killed. CEVI Branch reports actual or alleged Level 3 Incidents to CEVI Safeguarding who then reports to WVI Safeguarding through IIM system within 24 hours of the first notice. The response is implemented by the oversight and accountability to the WVI Safeguarding and support from the CEVI Safeguarding Focal Team.

Where mandated by applicable law, grant requirements, or agreements with CEVI, relevant Support Offices are informed immediately in coordination with CEVI Legal.

5. Reporting incidents: All CEVI staff and partners are responsible and obligated to report any suspicion of Level 2 or Level 3 incidents as soon as it is discovered. As stated, failure to report by one of the mechanisms below is a breach of this Policy and is grounds for disciplinary action up to and including termination of employment.

In addition, any credible concern or suspicion of sexual abuse or exploitation by a worker outside CEVI is immediately reported. Where interagency mechanisms are established, these are utilized to report the incident, in consultation with the CEVI Safeguarding Lead/Focal Point for the Branch Office or Crisis Management Team. Reports can be made by CEVI staff or partners in the following ways:

- a. Report to the line manager or HR manager
 - b. Contact the Branch office or CEVI Safeguarding Focal Point/Security Focal Point (who then reports on the IIM system)
 - c. Contact Area Safeguarding focal point (who then reports on the IIM system)
 - d. Contact CEVI Safeguarding Focal Team by email
 - e. If the above options are not available or appropriate for whatever reason: Use CEVI Integrity and Protection Hotline: Client IPH - 0917 304 2802, Staff IPH - 0917 844 9124.
 - f. Contact WVI Safeguarding Unit by email at safeguarding@wvi.org or use Incident Reporting form in WV's Integrated Incident Management (IIM) system:
www.worldvisionincidentreport.ethicspoint.com
6. Notification of Safeguarding Incidents: The WVI Safeguarding Unit informs support offices and partners of safeguarding incidents according to contractual obligations and regulatory requirements. Additionally, support offices may be notified if an incident has potential reputational issues.
- a. The WVI Safeguarding Unit can provide a copy to the branch office for the purpose of notifying local offices if appropriate.
 - b. In line with the principle of "need to know", no identifying information on survivors, witnesses, or subjects of the complaint is shared in these notifications.
 - c. Only basic information is provided in order to a) ensure the privacy and safety of those involved in the incident and b) provide assurances that CEVI is appropriately managing the case.
 - d. Support offices notify their partners according to contractual/regulatory requirements using the information provided by WVI Safeguarding Unit's notification.
7. Disclosure: Whilst CEVI maintains appropriate confidentiality for individuals in Safeguarding Incidents, CEVI may disclose information or data about incidents, when lawfully permitted, in order to support the prosecution of suspected criminal activity, regulatory requirements, support learning, and accountability, enable appropriate due diligence, advocate to prevent future incidents, or as required by law.
- a. Information in ongoing investigations of Safeguarding Incidents, and information about past incidents, is shared only with those on a 'need-to-know' basis, as deemed necessary by the Head Office or Area office or CEVI Safeguarding Focal Team. If it is likely that sensitive information about survivors or about violence against children or adults will not be kept confidential, and would put people at risk if accessed by unauthorized parties, such information is not collected.
 - b. Detailed personal information, in particular health information, is not obtained or maintained by CEVI in safeguarding incident management, except for the minimum necessary to ensure CEVI handles the matter appropriately. Such personal data is kept strictly confidential and protected in accordance with the applicable data protection and information security standards.

8. Reporting to Authorities: CEVI evaluates reporting safeguarding violations to appropriate legal authorities, assessing any legal obligations to report, as well as the interests of the survivor(s). CEVI reports when legally authorized to do so unless a report is judged likely to cause greater harm to existing victims or potential future victims.
9. No Retaliation for Reporting: CEVI does not tolerate any harassment, retaliation, or adverse action whatsoever by any staff, director, vendor/service provider, or other partners as a result of any safeguarding report provided in good faith to CEVI, law enforcement, or other recognized reporting mechanism.
 - a. No staff shall be adversely affected because they refuse to carry out a directive that could reasonably be construed as likely to create abuse or neglect of a child or a client.
 - b. If staff believes that they are being retaliated against, the staff should immediately contact Human Resources or report it through the IPH. Anyone who retaliates against a staff for making a good faith report will be subject to disciplinary action up to and including termination. CEVI's commitment to antiretaliation does not prevent a reporter from appropriate disciplinary action if they are found to have engaged in unethical behavior or misconduct.
10. Safeguarding Investigations: Safeguarding investigations meet minimum standards and follow the core principles of investigating allegations of harm, exploitation, or abuse to children &/or clients living where CEVI has an area of operation: thoroughness, confidentiality, safety, competent investigators, impartiality, objectivity, timeliness, accuracy, and documentation.
 - a. Investigations follow a survivor-centered approach and investigators conduct the process in accordance with sector best practices to prevent further harm to the survivor. CEVI prioritizes the safety, physical and psychological health, and welfare of all survivors while upholding and promoting their rights of confidentiality, equality, and access to justice.
 - b. CEVI may deploy internally trained investigators or retain the services of an external investigator to manage an incident. Oversight of investigations takes place according to the protocols of the incident level.

VII. Programming Considerations for Safeguarding

1. Safeguarding Essentials in Activities: In all activities - CEVI seeks to do no harm to children or clients, to keep the interests of community members—especially children— at the center of our activities, and to utilize opportunities to help children be safer within their families and communities. This includes consideration of local child protection threats and issues during the entire program life cycle, and influencing local actors and groups to be safer organizations for children and clients.
2. Community Feedback and Complaints Mechanisms and Information Provision: Children, parents, and other adults are aware of established complaint mechanisms in CEVI and their right to be safe from abuse and exploitation in CEVI activities. Every cluster-level CEVI activity:
 - a. Ensures that there are community feedback and complaints mechanisms through which community members can report both general suggestions and any serious incidents of misconduct by CEVI staff or partners. These mechanisms should be safe and contextually appropriate (i.e. designed in consultation with the community and so child-friendly, gender-sensitive, and inclusive of those with low levels of literacy).

- b. Provides information to communities on what behavior they can expect of CEVI staff or partners and how to report any concerns about abuse, exploitation, or any other breaches of Behavior Protocols by CEVI staff or partners.
3. Online safety in CEVI activities: CEVI shall work closely with WVDF in supporting clients and their children participating in CEVI-organized digital activities—to understand how to safely and appropriately utilize social media and digital technology, while avoiding risks and appropriately responding to threats or incidents.
4. Humanitarian Responses: Because of the special vulnerability of children and clients during humanitarian responses, safeguarding measures take on additional importance. Category 3 Responses must meet the standards outlined in this Policy in addition to other industry standards.
 - a. Humanitarian protection and child protection are anticipated and planned for in activity designs, ensuring that CEVI does not expose clients to greater harm through participation.
 - b. All Category 3 Responses must complete a safeguarding self-assessment.
 - c. All Category 3 Responses must have an assigned Safeguarding Focal Point who has direct access to response management and who has responsibilities as expressed in Safeguarding Staffing of this Policy.

VIII. Board Safeguarding Governance

1. Accountability: Board of Trustees hold CEVI accountable for fulfilling their safeguarding responsibilities as outlined in the Board-level Partnership Policy for Child and Adult Safeguarding as well as the Partnership Management Policy for Child and Adult Safeguarding.
2. Risk appetite: Board of Trustees ensures that local risk appetite statements for Child and Adult Safeguarding set the risk area/category as Risk Averse.

When completing local risk appetite statements, the recommended goal for child and adult safeguarding is: We will not harm the communities and children we serve.

The meaning of this goal is: *We will proactively seek to prevent clients and children from being exposed to risk because of our activities or people. We will implement standards, processes, and mechanisms that ensure we make every reasonable effort to protect communities from harm through their engagement with us. This includes creating safe and appropriate ways for them to disclose harm. We will respond when clients and children are harmed in the communities where we work. We will put their safety first and act in the best interests of the survivors and affected communities, guided by our organizational policy, standards, and values.*

3. Committee oversight: Board of Trustees mandates one of its committees to provide oversight (or in the case of a Board Committee, advice) to safeguarding. Given the heightened level of importance of safeguarding oversight, the full Board of Trustees receives periodic reports and is informed as well as engaged on safeguarding issues.
 4. Head Office reports provided to the full Board of Trustees: CEVI provides a copy of the Annual Safeguarding Update Report to the Board of Trustees. CEVI also provides the associated Safeguarding Action Plan outlining how they will maintain and improve safeguarding controls as outlined in the Annual Safeguarding Update Report.

5. Training of Board of Trustees members: At inception, the entire Board of Trustees is given training by the local Safeguarding Focal Point or by the CEVI Safeguarding Focal Team where it is not practical for the local Safeguarding Focal Point to do so.
 - a. Every new member of the Board of Trustees is given this training at orientation and signs an acknowledgment of having reviewed the Safeguarding Policy. This acknowledgment is kept on file by CEVI Head Office or HR Department.
 - b. Board of Trustees members re-elected to serve another term repeat the training they received at orientation to refresh their knowledge.

DEFINITIONS

Client: CEVI uses a definition of 'client' to include direct clients or adult beneficiaries of a particular covered area.

Child: Any person below the age of 18. This Partnership Management Policy on Child and Adult Safeguarding cover interactions by CEVI staff and partners with all children anywhere (not only clients).

Child protection: All measures taken to prevent and respond to abuse, neglect, exploitation, and all other forms of violence against children.

“CEVI’s Area of Operation” or “Clients Living Where CEVI Has an Area of Operation”: CEVI uses a broad working definition of these terms to ensure that any individuals who may be subject to power imbalance with CEVI staff, or partners are protected through this Policy.

Vendors/Service Providers: CEVI contracts with non-employee individuals and organizations to perform services in line with or for CEVI. These non-employee individuals and organizations may also be referred to as 'independent contractors', 'consultants,' or 'vendors/service providers, and are referred to in this document as Vendors/Service Providers. Vendors/Service Providers are distinguished from organizations with which CEVI partners carry out activities.

Partner: A partner organization, for safeguarding purposes, is a Non-Governmental Organization, Community-Based Organization, for-profit enterprise, or other entity that has a written agreement with CEVI to implement a project or activity on CEVI’s behalf or in collaboration with CEVI. The partner may or may not be funding CEVI.

Safeguarding: Preventing, reporting, and responding to harm or abuse by CEVI staff and partners, of any children anywhere and of any clients living where CEVI has an area of operation. Externally to CEVI, there is often no distinction made between child and client (adult) safeguarding.

Child safeguarding: Preventing, reporting, and responding to harm⁴, abuse, or exploitation of any child (< age 18) by a CEVI staff or partners⁵. The Partnership Management Policy on Child and Adult Safeguarding also requires reporting/referring child abuse cases affecting any child in CEVI projects or activities, even if not committed by CEVI staff or partners.

Client safeguarding: Preventing, reporting, and responding to harm, abuse, or exploitation of an adult living where CEVI has a programming presence (age 18+) by a CEVI staff or partners. Includes Prevention of Sexual Exploitation and Abuse (PSEA), a frequently cited subset of safeguarding.

Safeguarding incident: Harm or risk of harm resulting from safeguarding misconduct or violations of this Policy to any child or to any clients living where CEVI has an area of operation.

Sexual Exploitation and Abuse (SEA): The term “sexual exploitation” means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. The term “sexual

⁴ Includes injury or death of a child while participating in a WV activity or when involved in a road traffic accident with a WV driver or WV vehicle.

⁵ Includes CEVI staff, learners, visitors, OJTs, Board members, vendors/service providers, or partners—as well as employees of partners and vendors/service providers.

abuse” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions⁶.

Prevention of Sexual Exploitation and Abuse (PSEA): A term used by the United Nations and the International Non-Governmental Organization community to refer to measures taken to protect vulnerable people from sexual exploitation and abuse by humanitarian aid workers.

CEVI Staff and partners: Refers to the full range of people accountable to CEVI’s Safeguarding policies and protocols, including all staff, learners, OJTs, visitors, and Board of Trustee members, as well as external parties, community volunteers, vendors/service providers, partners, and others affiliated with partners or vendors/service providers.

On-the-Job Trainees: An individual taking part in a trainee program of an organization but not an official employee per se.

All CEVI personnel must sign the document which affirms they have read and understood this policy.

I have read the above policy statement on SAFEGUARDING MANAGEMENT POLICY and understand that I will be accountable for my actions and will be subject to sanctions or consequences based on the Employee Code of Discipline in the event that I violate the policy and act against the acceptable behaviors listed above towards clients.

Signature: _____

Date: _____

Printed Name: _____

⁶ UN Secretary-General’s Bulletin on protection from sexual exploitation and abuse (PSEA) (ST/SGB/2003/13)