



## A.M. Qattan Foundation

### Child Protection Policy and Procedures

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## 1. Introduction

A.M. Qattan Foundation is committed to conducting its programmes in a manner that is safe for the children it serves and to helping protect the children with whom it is in contact. As a non-profit organisation for cultural and educational development, the Foundation prioritises the creation and maintenance of an environment that aims to prevent all forms of abuse and promotes the implementation of its child protection policy.

## 2. Definitions<sup>1</sup>

Child	Individuals below or of the age of 18.
Adult	Individuals above the age of 18.
Child Protection	Measures, structures, processes and guidelines that aim to prevent and respond to all forms of abuse, be they intentional or not. In this document, child protection pertains to the responsibility of the Foundation's representatives towards children they are in contact with, within the scope of their engagement with the Foundation.
Abuse	Any action that can harm or cause harm to children, be it physical or psychological. This includes physical violence, emotional or psychological abuse, neglect or negligent treatment, ill treatment, exploitation and sexual abuse.
Types of abuse	<ul style="list-style-type: none"><li>- Physical abuse: any form of action that causes or can cause physical injury or suffering no matter the severity of such an injury. This also includes subjecting children to any form of harmful materials, such as tobacco, alcohol or drugs, etc.</li><li>- Emotional or psychological abuse: the emotional, psychological or verbal ill treatment of a child through direct or indirect interaction. Examples are humiliation, degradation, name-calling, belittling, constant criticism, shaming, isolation, exposure to inappropriate visual materials, etc.</li><li>- Neglect: the failure to provide physical and/or developmental needs and rights of a child, and the failure to protect children from harm, either deliberately or not while in the care of Foundation representatives.</li><li>- Sexual: All forms of sexual abuse/violence. Child sexual abuse may also include indecent touching or exposure, using sexually explicit language towards a child and showing children pornographic material.</li></ul>
Bullying	Any form of abuse directed by one child or more towards other children

<sup>1</sup> United Nations Human Rights Office of the High Commissioner, Convention on the Rights of the Child (1989): <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>.

Save the Children, Child Protection and Care Related Definitions (2007):

<https://resourcecentre.savethechildren.net/sites/default/files/documents/5608.pdf>.

Self-inflicted violence	Self-harm, self-mutilation
Children with disabilities	Children with physical, emotional or cognitive conditions that challenge their involvement in actions/activities when compared to non-disabled children.
Direct contact with children	Direct interaction with children within the framework of Foundation-related activities. This can be regular, intermittent or onetime. It can be in the form of training sessions, planned activities, field trips, meetings, etc.
Indirect contact with children	Access to information about children within the Foundation's scope of work as well as actions that impact the context in which the Foundation undertakes its work with children.
Informed consent	The obligation to provide all available information about any activity the child shall be part of to the child and his/her legal guardians in order for them to provide consent to participate and any related outcomes (e.g. use of visual materials publicly).
Best interests of a child	A basic principle in the Convention on the Rights of the Child (1989), it signifies the main consideration of the ethical and legal framework surrounding work with children.
Foundation	The A.M. Qattan Foundation
A.M. Qattan representatives	Regular and temporary employees, project or programme partners, consultants, contractors, agents, advisors, volunteers, interns, donors and others who have contact with children through the programmes of the A.M. Qattan Foundation

### 3. Our Policy

#### 3.1 Implementation:

The A.M. Qattan Foundation will meet its commitment to conduct programmes that are safe for children and help protect children through the following means:

- Awareness: Ensuring that all Foundation representatives are notified of and made aware that they are expected to comply with the policy.
- Prevention: Striving, through awareness and good practice, to safeguard children from any risks, and take positive steps to help protect children.
- Reporting: Ensuring that all Foundation representatives know what steps to take when concerns arise regarding the safety of children.
- Responding: Engaging in action that supports and protects children when concerns arise regarding their safety; supporting those who raise such concerns; investigating or cooperating with any subsequent process of investigation; and taking appropriate responsive action.

### **3.2 Legal Framework:**

This policy is based on the United Nations Convention on the Rights of the Child (1989). However, the Foundation operates in the UK, Palestine and Lebanon, and therefore this policy is to be followed alongside local laws in its countries of operations and any other specific guidelines issued in these countries, mainly:

- Children Act (1989) - UK
- Children Act (2004) - UK
- Palestinian Child Law (2004) - Palestine
- Child Protection Law no. 242 (2002) - Lebanon

In addition, this policy is to be read alongside other Foundation policies, particularly the Human Resource (HR) Manual and Media Policy.

### **3.3 Scope:**

This policy is applicable to all permanent and temporary employees, project or programme partners, consultants, contractors, agents, advisors, volunteers, interns, donors and others who have contact with children through the Foundation's programmes.

### **3.4 Review:**

This policy is reviewed every five years or when any legal, operational or contextual changes take place.

## **4. Guidelines**

### **4.1 Adults' Code of Conduct:**

- In all actions concerning children the best interests of the child shall be a primary consideration.
- All Foundation representatives in direct or indirect contact with children shall be made aware of this policy and all relevant information as well as the guidelines and rules they are expected to abide by; this shall be made clear in all contracts, and a weblink to this policy shall be included.
- All Foundation representatives shall attest in writing to receiving and understanding this policy in addition to other policies and manuals used by the Foundation during the orientation phase.
- All Foundation representatives shall read and sign an agreement (Annex 1), upon contract signature with the Foundation.

#### **4.2 Privacy of Information:**

Data about children (personal information, text, photos, etc.) collected through enrolment forms or any form of activity are treated with utmost confidentiality. The following guidelines are to be followed:

- All data (digital and non-digital) shall be stored securely.
- Access to data is only permissible to the Programme Director and HR officer where applicable.
- Permission to access children's data shall be documented between relevant parties detailing the reason and potential use.
- All publicity that may potentially identify or communicate personal information about a particular child must not reveal any information that does not have prior consent from the child's legal guardians.
- Informed consent for the use of audio-visual materials should be solicited from child's legal guardians and documented using forms approved by the Foundation.<sup>2</sup>
- In communications about children, Foundation representatives must use images and language that is respectful and culturally appropriate.

#### **4.3 General Guidelines for Work with Children with Disabilities<sup>3</sup>:**

- Discrimination, harassment or victimisation are expressly prohibited and should be reported.
- Children with disabilities shall be treated with respect to their dignity, individual autonomy, difference, capacity and right for full and effective participation and inclusion.
- Children with disabilities shall be given equal opportunity and accessibility to facilities and activities.

#### **4.4 Additional Guidelines:**

- All forms of abuse are expressly prohibited and should be reported (including bullying or self-harm); claims of mistaken belief of the age of the child are not a defence.
- The exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour with children is prohibited. This includes assistance that is due to children benefiting from the Foundation programming.

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<sup>2</sup> The Child Enrollment Form used at the Child Centre in Gaza and the Consent Form added to the Media Policy.

<sup>3</sup> Based on the Convention on the Rights of Persons with Disabilities and Optional Protocol, United Nations, <http://www.un.org/disabilities/documents/convention/convoptprot-e.pdf>.

- Foundation representatives must not stay alone overnight with children benefiting from Foundation programmes who are not part of their immediate or extended family, whether in their house, project premises or elsewhere.
- Where possible and practical, the 'two-adult' rule, wherein two or more adults supervise all activities where children are involved and are present at all times, should be followed.
- Foundation representatives need to be aware that they may work with children who, because of the circumstances and abuses to which they may have been subjected, may use a relationship to obtain special attention. The adult is always considered responsible for maintaining an appropriate relationship. Should a child behave inappropriately, this must be reported.
- Foundation representatives should not place themselves in compromising or vulnerable positions and should take care not to discriminate against, show differential treatment towards, or favour particular children to the exclusion of others.

## **5. Roles and Responsibilities**

### **5.1 Guiding Principles:**

- All Foundation representatives who have contact with or access to sensitive information about children are to be informed of the organisation's child protection policy and standards and to agree to comply with such policies and standards.
  - Foundation employees are required to acknowledge receipt and provide written consent to follow all the Foundation's standards, policies, procedures and code of conduct.
  - The Foundation shall exert all efforts to ensure that newly recruited staff, volunteers or consultants do not have any record of child abuse. This will follow the legal frameworks in every country of operation, such as obtaining a Disclosure and Barring (DBS) check in the UK.
  - The Foundation ensures that the working environment is open to discussion of children protection policies and actions both in formal and informal settings.
  - The best interests of the child underpin the child protection process; in cases of conflicts or lack of clarity, the former take precedence over anything else.
  - The Child Protection Policy shall be referred to in any agreement signed by the Foundation with partners who will be directly involved with children during their work with the Foundation.
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- The Foundation shall provide an environment conducive to safety where children feel able to come forward with any case of abuse they know of. Every child should be listened to, and it's the duty of Foundation representatives to listen to any source of

concern the children may have and treat that concern seriously. The child should be made aware that his/her concern would be shared only with individuals at the Foundation responsible for child protection issues.

- The Foundation shall organise regular training on child protection when needed.
- It is not the responsibility of the first person to hear of a possible case of child abuse to decide that abuse has taken place or not. It is her/his responsibility to report concerns directly to the Programme Director.
- The senior staff member on site should take all possible measures to provide protection for the children on site during any activity that involves children. In cases of reported abuse and during any ongoing investigations, all efforts should be exerted to ensure that the child/children in question feel safe and receive any support needed.
- Any person who suspects or hears of any abuse involving children that are part of the Foundation's activities or programmes supported by the Foundation should immediately report to the Foundation contact person. If suspicion involves that contact person, then this should be reported to the Programme Director immediately.
- Any person who has suspicion of any child abuse or hears of any such abuse at an organisation that is a partner to the Foundation should report to the Foundation HR officer within 24 hours. The Foundation will communicate through HR or the Director General with the partner organisation through official and available channels.
- Any representative that has concerns or knows of acts of bullying or self-harm among children under his/her care should take necessary measures to provide protection for the child or children facing abuse, and has the right to remove or discipline the children undertaking abuse.

## **5.2 Specific Programme Directors' Responsibilities:**

- Handle complaints expediently and with objectivity, sensitivity and fairness.
- Act as a positive example.
- Ensure that all persons within the scope of their supervisory responsibilities who are subject to this policy have read, understood and agreed to abide by its contents.
- Maintain a culture of openness to enable the discussion of any issues or concerns and ensure accountability of staff so that poor practice or potentially abusive behaviour does not go unchallenged.
- Monitor the workplace to ensure adherence to the policy, recognition of potentially abusive behaviour and initiate appropriate investigative action.



### **5.3 Specific General Management Responsibilities:**

- Engage in periodic training of staff with respect to abiding by and implementing the policy.
- Investigate fully all complaints of abuse and exploitation of children with whom the Foundation is in contact in accordance with the procedures provided below.
- Inform prospective employees and Foundation representatives of the requirement that all Foundation representatives comply with the Foundation's Child Protection Policy.
- Notify Foundation representatives and prospective employees that the Foundation, at its sole discretion, reserves the right to perform criminal background checks where such checks are legally permissible.
- Comply with any legal requirements to report alleged abuse or neglect to the appropriate authorities.

## **6. Reporting, Investigation and Response**

- Complaints and disciplinary actions follow the Foundation's HR manual.
- Senior Staff and Programme Directors, or anyone concerned or informed of concerns about the safety of a child, must inform the Director General in order to deliberate about the issue at hand and decide on the appropriate course of action to investigate further.
- After conducting the initial investigation, the Director General prepares a written report on the concerns raised, the process of the investigation and its outcomes. This report shall then be shared with the Chair of the Board.
- Further consultation with the relevant persons and the Foundation's lawyer will result in a decision as to the appropriate response. After this decision, all parties will be informed while making sure the privacy of information is appropriately maintained.
- The senior Foundation representative on site must take all appropriate and reasonable steps to protect the child involved and to keep all parties involved apart during the investigation.
- It is essential to avoid delays if this places the child at further risk. In cases of possible abuse, every effort should be made to provide the child with appropriate assistance.
- An employee who has been brought under investigation by the Foundation or by official law enforcement authorities may be temporarily suspended and shall have no access to children during the course of the investigation. The employee will be informed that concerns have been raised and given an opportunity to respond.
- The A.M. Qattan Foundation reserves the right, in the event an employee is discharged for proven abuse, to disclose such information if requested by a prospective employer.

- Inappropriate behaviour toward children, including failure to follow the specific and general requirements of this policy, is grounds for disciplinary action, up to and including dismissal from employment or termination of consultancy, agency, volunteer/internship or board/advisory council membership.

## **Annex 1: Code of Conduct**

I have read and understood the A.M. Qattan Foundation Child Protection Policy and I agree to abide by its contents and take on the responsibilities pertinent to me in its implementation.

I undertake the following commitments to:

- treat every child with respect and dignity.
- be a role model in the way I work with children and adults, and to foster a safe and friendly environment.
- ensure that a culture of openness exists to enable any issues or concerns to be raised and discussed.
- refrain from any action that may be illegal, unsafe or abusive or any action that may seem encouraging of such.
- refrain from acting in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
- treat children with equality, avoiding discrimination, differential treatment or favour particular children over others.
- ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged.
- care for the safety and protection of children and provide constant supervision in line with my tasks at the Foundation.
- encourage children to raise their concerns and empower them to discuss their rights, responsibilities and what is acceptable and what is not.
- guard the privacy of information I might have access to about children, including refraining from using any digital material that does not have informed, written consent for use in any communication (including social media proposals, flyers, etc.)
- adopt patience and wisdom and avoid reactions that can or may seem to be hasty, angry, violent, etc. in relation to children's behaviour.
- keep a safe and proper emotional distance from children.
- cooperate fully in any investigation.

Name:

Signature:

Date: