



Childhood Education International Policy on Protection from Sexual Exploitation and Abuse and Child Protection

1. Introduction and Preamble

Childhood Education International (CE International) designs and delivers programs, trainings, professional development, and consulting services that transform education leaders into changemakers who harness the power of education as the force that drives all international development. The child is at the center of our model. In order to grow, learn, and develop to their full potential, children need to be healthy and safe.

This policy defines CE International's commitment to the protection from sexual exploitation and abuse (PSEA) of vulnerable children and adults, involving CE International personnel. In recognition of the special vulnerability of children, this policy affirms CE International's commitment to the welfare and protection from sexual exploitation and all forms of abuse of children. CE International has a zero-tolerance approach toward sexual exploitation and abuse and child abuse and does not allow any partner, supplier, sub-contractor, agent or any individual engaged by CE International to engage in any form of sexual abuse or exploitation against children and vulnerable adults associated with its work.

CE International takes seriously all concerns and complaints about sexual exploitation and abuse and child abuse involving CE International workers. CE International initiates rigorous investigation of complaints that indicate a possible violation of this policy and takes appropriate disciplinary action, as warranted.

2. Scope of Application

This policy applies to all persons working for or on our behalf of CE International in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers and business partners. It applies during or outside of working hours, every day of the year.

3. Definitions

3.1 Beneficiary

Beneficiary refers to all children or adults who benefit from or come into contact with CE International implemented or financially supported projects.

3.2 Children and vulnerable adults

A child is any individual under the age of 18, irrespective of local country definitions of when a

child reaches adulthood.¹

Vulnerable adults are defined as:

- those aged over 18 years and who identify themselves as unable to take care of themselves/ protect themselves from harm or exploitation; or
- who, due to their gender, mental or physical health, disability, ethnicity, religious identity, sexual orientation, economic or social status, or as a result of disasters and conflicts, are deemed to be at risk.

3.3 Sexual Exploitation²

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. This definition covers children and adults.

3.4 Sexual Abuse

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This definition covers children and adults.

3.5 Child Exploitation and Abuse

Any and all forms of physical and/or emotional ill-treatment, abuse or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. This involves one or more of the following:

a. Physical abuse

Physical abuse occurs when a person purposefully injures or threatens to injure a child or young person. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.

b. Emotional abuse

Emotional abuse is inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child's self-esteem or social competence.

c. Neglect

Neglect is the failure to provide a child (where they are in a position to do so) with the conditions that are culturally accepted as being essential for their physical and emotional development and well-being.

d. Child Sexual Abuse

Child sexual abuse is the involvement of a child in sexual activity that s/he does not fully comprehend, give informed consent to, or for which s/he is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society. It is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. It may include, but is not limited to, the inducement or coercion of a child to engage in any unlawful sexual activity, the exploitative use of a child in prostitution or

¹ Definition of child from the InterAgency Standing Committee (IASC) Guidelines to implement Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by UN and non-UN Personnel, March 2013.

² Definitions of "sexual exploitation" and "sexual abuse" from the United Nations Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13).

other lawful sexual practices or the exploitative use of pornographic performances and materials. This policy

e. Grooming

Grooming generally refers to behavior that makes it easier for an offender to procure a child for sexual activity. It often involves the act of building the trust of children and/or their caregivers to gain access to children in order to sexually abuse them. For example, grooming includes encouraging romantic feelings or exposing the child to sexual concepts through pornography.

f. Online grooming

Online grooming is the act of sending an electronic message with indecent content to a recipient who the sender believes to be less than 18 years of age, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

3.6 Sexual Exploitation and Abuse

Use of the term “Sexual exploitation and abuse” throughout this policy refers to children as well as vulnerable adults and refers to all forms of inappropriate conduct of a sexual nature.

3.7 CE International Employees/workers and Related Personnel

The term “CE International Employees and Related Personnel” and “CE International workers” includes all employees of CE International, CE International Members, CE International Affiliates and CE International Projects. The term also includes board members, volunteers, interns, visitors and international and local consultants, in addition to individual and corporate contractors of these entities and related personnel. This includes non-CE International entities and their employees and individuals who have entered into partnership, sub-grant or sub-recipient agreements with CE International.

3.8 Zero tolerance

CE International has a culture of zero tolerance for all forms of abuse and mistreatment, including Sexual Exploitation and Abuse, Harassment, Intimidation and Bullying. This means that every concern is fully responded to and, where necessary, prompts action, including conducting an investigation and taking disciplinary action, when applicable. It means that all CE International Employees and Related Personnel are held to account against the same standards and subjected to the same processes, regardless of position or reputation within or outside of the organization.

4. Core Principles³

In order to protect the most vulnerable populations, particularly beneficiary and/or vulnerable adults and children, and to ensure the integrity of CE International activities, the following six IASC Core Principles must be adhered to by all CE International Employees and Related Personnel:

- 4.1** Sexual exploitation and abuse by CE International Employees and Related Personnel constitute acts of gross misconduct and are therefore grounds for termination of employment.
- 4.2** Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not a defense.

³ The six Core Principles are from the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13). They have been modified by CE International to refer to “CE International Employees and Related Personnel”.

4.3 Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior by CE International Employees and Related Personnel is prohibited. This includes the exchange of assistance that is due to beneficiaries.

4.4 Any sexual relationship between CE International Employees/Related Personnel and beneficiaries that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of CE International's work.

4.5 Where a CE International Employee or Related Personnel develops concerns or suspicions regarding sexual abuse or exploitation and child abuse by a fellow worker, whether in CE International or not, he or she must immediately report such concerns via the established agency reporting mechanisms.⁴

4.6 CE International Employees and Related Personnel are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of the Code of Conduct and this Policy. Managers at all levels have particular responsibilities to support and develop systems, which maintain this environment.

5. Commitments⁵

In accordance with Article 19 of the *United Nations Convention on the Rights of the Child (UNCRC)*,² CE International recognizes the right of all children to be protected from all forms of abuse and exploitation and, in accordance with Article 3, all actions on child SEA shall be taken in the best interest of the child, which are paramount. CE International recognizes its responsibility to ensure that CE International projects, workers, and others working with or on behalf of CE International do no harm to children. CE International is committed to ensuring that our organizational policies, protocol, procedures, and actions reflect our commitment to fulfilling these responsibilities through the following:

5.1 Develop organization-specific strategies to prevent and respond to sexual exploitation and abuse and child abuse, including incorporating appropriate job responsibilities in specific staff positions to support and ensure effective implementation of organization strategies to prevent and respond to sexual exploitation and abuse, including:

Recruitment

1. As part of the recruitment process for every position at CE International, including those involving direct contact with children and for both internal employees and external candidates, every selected individual must undergo a minimum of three documented employment reference checks. References cannot be family members or relatives and at least one must be a past supervisor; for internal employees, current supervisor must also serve as a reference.

2. Whenever legally permissible and possible, criminal background checks including police and/or criminal records, and/or other additional background checks are conducted prior to an employment offer being extended.

3. Interviews with candidates involving direct contact with children must include appropriate child safeguarding questions.

4. Employment listings, Job Descriptions, Terms of Reference, staff employment handbooks and policies, orientation materials, and employment contracts and agreements for new and returning workers includes the responsibility to abide by CE International's Code of Conduct and PSEA policy.

⁴ The established complaints mechanism may at times be an internal CE International mechanism however CE International is also committed to participating in inter-agency community-based complaints mechanisms in humanitarian contexts and therefore inter-agency complaints mechanisms may be the established system in some contexts.

⁵ The Commitments are based on the Statement of Commitment Relating to Sexual Exploitation and Abuse by UN and non-UN Personnel, August 2008.

- 5.** In compliance with applicable laws, prevent perpetrators of sexual exploitation and abuse and child abuse from being (re)hired or (re)deployed.
- 5.2** Undertake risk assessments to identify areas of risks and document steps that are being taken to remove or reduce these risks.
- 5.3** Incorporate CE International's standards on sexual exploitation and abuse and child protection in CE International's code of conduct and in induction materials and training courses for CE International Employees and Related Personnel.
- 5.4** Ensure that when engaging in partnerships, sub-grant or sub-recipient agreements, these agreements a) incorporate this Policy as an attachment; b) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to abide with a Code of Conduct that is pursuant to the standards of this Policy; and c) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse and child abuse, to investigate and report allegations thereof, or to take corrective actions when sexual exploitation or abuse or child abuse has occurred, shall constitute grounds for CE International to terminate such agreements.
- 5.5** Regularly inform CE International Employees and Related Personnel and communities on measures taken to prevent and respond to sexual exploitation and abuse and child abuse. Such information will be developed and disseminated in-country in cooperation with other relevant agencies and include details on complaint mechanisms, the status and outcome of investigations in general terms, feedback on actions taken against perpetrators, and follow-up measures taken, as well as assistance available to complainants and survivors. Any information that is not of a general nature and concerns specific cases must respect confidentiality for all parties involved, including the survivor and family, employee or related personnel, and the ongoing investigation process, particularly where there are legal implications.
- 5.6** Engage the support of communities and governments to prevent and respond to sexual exploitation and abuse and child abuse by CE International Employees and Related Personnel.
- 5.7** Ensure that complaint mechanisms for reporting sexual exploitation and abuse and child abuse are accessible and that CE International focal points for receiving complaints understand how to discharge their duties. This should include a documented reporting procedure in a relevant local language for sexual exploitation and abuse and child abuse allegations and policy for non-compliance in, including available sanctions for breaches.
- 5.8** Provide support and assistance to complainants of sexual exploitation and abuse or child abuse. This may include medical treatment, legal assistance and psychosocial support as appropriate and according to the wants and needs of the survivor whilst also taking account of confidentiality, cultural sensitivities and survivor safety.
- 5.9** Investigate allegations of sexual exploitation and abuse and child abuse in a timely and professional manner. This includes the use of appropriate interviewing practices with complainants and witnesses, particularly with children. Engage professional investigators or secure investigative expertise as appropriate.
- 5.10** Take swift and appropriate action, including legal action when required, against CE International Employees and Related-Personnel who commit sexual exploitation and abuse and child abuse. This may include administrative or disciplinary action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country.

5.11 Take appropriate actions to the best of CE International's abilities to protect persons from retaliation where allegations of sexual exploitation and abuse or child abuse are reported involving CE International Employees or Related Personnel.

5.12 Ensure high-level oversight and information systems on sexual exploitation and abuse and child abuse reports received and actions taken, in order to monitor effectiveness, report progress and improve efforts to prevent and respond to sexual exploitation and abuse and child abuse.

6. CE International Employee and Related Personnel Standards

CE International's capacity to achieve its vision and mission depends upon the individual and collaborative efforts of all CE International Employees and Related Personnel. To this end, all CE International Employees and Related Personnel must uphold and promote the highest standards of ethical and professional conduct and abide by CE International's policies. This policy sets the minimum standards to be followed by all CE International Employees and Related Personnel to protect beneficiaries and communities from sexual exploitation and abuse and child abuse by CE Employees and Related Personnel.

As such, CE International Employees and Related personnel will not:

1. Physically punish or discipline or physically harm or abuse child or adult beneficiaries protected by this policy, including deliberately making a child or adult sick, ill, or unwell.
2. Do things for children of an intimate, personal nature that they can do for themselves.
3. Act in ways intended to shame, humiliate, belittle or degrade children or adults, or otherwise perpetrate any form of emotional abuse. This includes language or behavior around or towards children or adults protected by this policy that is inappropriate, harassing, abusive, sexually provocative or demeaning.
4. Engage in sexual activity with children regardless of the age of consent locally. Mistaken belief in the age of the child is not a defense.
5. Marry children.
6. Arrange, facilitate, or otherwise allow or neglect to prevent their children from undergoing Female Genital Mutilation (FGM).
7. Invite child or adult beneficiaries into their home, unless the supervisor has agreed that it is necessary for the protection of a child.
8. Sleep in the same bed or room as a child beneficiary. If it is necessary to sleep in the same room, ensure that another adult is present and that supervisor's permission has been obtained.
9. Discriminate against, show differential treatment to, or favor particular children or adults to the exclusion of others.
10. Hire children or any CE International beneficiary for domestic or other labor regardless of national labor laws, notably that which is inappropriate given the age or developmental stage of a child, interferes with their education or recreational activities, or places them at significant risk of injury.
11. Develop relationships with children or adults that could in any way be deemed inappropriate, exploitative or abusive. This includes engaging in sexual activity with adults protected by this policy, whether or not the individual believes they have obtained consent. Consent is determined from the perspective of the adults protected by this policy who experience the prohibited behavior. Ignorance or mistaken belief of the child's age is not a defense. If an employee engages in sex or sexual activities with a beneficiary, the employee must disclose this conduct to his /her supervisor for appropriate guidance. Failure to report such conduct may lead to disciplinary action pursuant to CE International's policies and procedures.
12. Imply or request that any favor, including economic or sexual, be given in exchange for access to CE International provided or supported services or activities.
13. Use any computers, mobile phones, video cameras, or social media, including those belonging to CE International, to exploit or harass children or adults protected by this policy.
14. Access child pornography through any medium.

15. Support or take part in any form of sexual exploitative or abusive activities, including, for example, child pornography or trafficking of human beings.
16. Engage the services of a sex worker, regardless of whether it is legal in the country where the service is purchased.

CE International Employees and Related Personnel must:

1. Ensure wherever possible that when working with individual children, another adult is present.
2. Ensure that images taken of children (e.g., photographs and videos) are accurate and respect children's privacy and dignity. Children must be adequately clothed in images. Sexually suggestive poses are prohibited.
3. Ensure depictions of adults protected by this policy respect their privacy and present them in a dignified manner.
4. Obtain informed consent from children and their caregivers and of adults before taking photographs of them, except under exceptional circumstances where this may not be possible or may not be in the best interest of the child. When possible and appropriate, this consent should be in writing and children and caregivers should be informed of how the images will be used.
5. Restrict use of images of child and adult beneficiaries to professional, respectful, awareness raising, fundraising, publicity, and programmatic purposes.
6. Ensure that any image or recorded case history of a child or adult does not place him/her at risk or render him/her vulnerable to any form of abuse.
7. Respect principles of confidentiality, abide by data protection protocol, and only share personal information on a need-to-know basis.
8. Make all effort to minimize risk of harm to child and adult beneficiaries.
9. Immediately report suspicion or allegations of child abuse or exploitation or policy non-compliance in accordance with reporting guidelines. Employees and Related Personnel must report any such concerns even when the person who may be in violation of this Policy is Related Personnel, as previously defined, and not a CE International Employee.
10. CE International Employees and Related Personnel will prevent, oppose and combat all exploitation and abuse of children. CE International Employees and Related Personnel will further create and maintain an environment that promotes implementation of this policy. Directors, managers and supervisors at all levels have particular responsibilities to support and develop systems that maintain an environment that facilitates implementation of this policy and which is free of sexual exploitation and abuse and child abuse.

These Standards apply to all CE International Employees and Related Personnel. Any violation of these Standards is a serious concern and may result in disciplinary action, up to and including dismissal, in accordance with disciplinary procedures and applicable laws.

All CE International Employees and Related Personnel must sign these standards. Employees and individuals of non-CE International entities that have entered into partnership, sub-grant or sub-recipient agreements with CE International may instead sign their employer's code of conduct and standards if they are consistent with these standards.

The need for this policy flows from a recognition that our work often puts CE International Employees and Related Personnel in positions of power in relation to the communities we work with, especially vulnerable adults and children. CE International Employees and Related Personnel have an obligation to use their power respectfully and must not abuse the power and influence they have over the lives and well-being of the beneficiaries of CE International programs and others in the communities where CE International works.

7. Responsibilities

7.1 All CE International Employees and Related Personnel

All CE International Employees and Related Personnel share an obligation to prevent and respond to sexual exploitation and abuse and child abuse. It is the responsibility of all CE International Employees and Related Personnel to uphold the Core Principles and Commitments of this policy along with the Standards for CE International Employees and Related Personnel. All CE International Employees and Related Personnel must sign the Standards. CE International Employees and Related Personnel, who work with communities concerned, will also contribute to regular monitoring by seeking feedback from beneficiaries.

7.2 Senior Managers, Supervisors and Human Resource Managers

Senior Managers, Supervisors and Human Resource Managers must ensure that all CE International Employees and Related Personnel understand and comply with this policy and sign the Standards for CE International Employees and Related Personnel. Human Resource Managers are also responsible for robust recruitment, induction and training, whilst Senior Managers and Supervisors are responsible for performance management to prevent sexual exploitation and abuse and child abuse.

7.3 Regional Advisors and In-Country Representatives, including Country Leads (CLs) / CE International senior leadership in any country/ region

Regional advisors and in-country representatives, including but not limited to Country Leads (CLs) must provide clear guidance and demonstrate how the organization, across its operations, will ensure that vulnerable adults and children are protected from sexual exploitation and abuse in the delivery of projects in-country. Regional advisors and CLs must ensure that culturally appropriate community-based complaint mechanisms are developed, implemented, and monitored and reviewed for effectiveness. This includes awareness-raising with program participants and CE International Employees and Related Personnel about protection from sexual exploitation and abuse and child abuse and how to use the complaints mechanism. Regional advisors and CLs will also ensure that complaints handling and investigation procedures are enacted, along with appropriate employee disciplinary procedures as necessary. CLs are responsible for the provision of appropriate survivor assistance.

7.4 CE International Members and Affiliates

CE International Members and Affiliates will ensure this policy is reflected in their own codes of conduct.

CE International Members and Affiliates are responsible for defining workplans and procedures to uphold and operationalize this policy. Members and Affiliates must have in place complaints and investigation procedures and employee disciplinary procedures.

CE International HQ focal points will provide the necessary support to Country Offices to ensure Country Offices have in place complaints mechanisms, investigations procedures, survivor assistance support, and guidelines for monitoring, review and reporting against this policy.

7.5 CE International Board of Directors

The CE International Board of Directors will coordinate oversight of this policy in collaboration with CE International HQ focal points, and review and update according to a mutually agreed upon timeframe. The CE International Board of Directors will monitor and report against this policy utilizing standardized data for global accountability.

8. Associated Policies

This policy is complementary to the set of standards of behavior that all CE International employees are required to adhere to in the CE International Code of Conduct and Accountability to Affected Population framework and any further codes or related policies defined by CE International Members, Affiliates, and Regional Advisors and Country Leads.