

Child Protection Policy

May 2016

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**1.Introduction**

Happy Hub Kampot (HHK) is a community development organisation focused on breaking the cycle of poverty in the lives of disadvantaged children and families in the Greater Kampot Province.

HHK is fully committed to a strict Child Protection Policy to ensure all of the children involved in our programs are protected from harm, abuse, exploitation, violence or neglect whilst in engaged in our programs or as a result of our programs.

HHK undertakes necessary steps to minimize any potential risk of child abuse and protect children from harm.

HHK has a responsibility to ensure that all staff members understand about child protection and to take specific measures to protect children in the course of their work with HHK.

**2. Definitions**

**2. 1. Child Abuse:**

Child abuse means any harm inflicted upon a child that negatively affects their physical or emotional development. Child abuse includes sexual abuse, physical abuse, emotional abuse, child labor and neglect. It is important to note that abuse can happen to all children, of both sexes, and of all ages. It is important to understand that abuse can be inflicted on a child not just by an adult, but also by other children and young people.

**2. 2. Emotional Abuse**:

Emotional abuse is the emotional mistreatment of a child such that affects the child’s emotional development. This may or may not be ongoing. Examples may include but are not exclusive to:

● Telling a child, or causing a child to feel that they are worthless, unloved, inadequate

● Exposing a child to the ill-treatment of another

● Bullying (including cyber bullying)

● The exploitation or corruption of a child

● Not giving the child opportunities to express their views

● Deliberately silencing a child who is trying to express their opinions

● Making fun of what of what a child says or how they communicate

● Age inappropriate expectations being imposed on the child

● Preventing the child participating in normal social interactions

● Threats to harm a child

Please note that some level of emotional abuse is involved in all types of maltreatment

of a child, but can also occur on its own.

**2.3. Physical Abuse**: Physical abuse occurs when a person purposefully injures a child. This may include but is not exclusive to:

* Hitting
* Slapping
* Punching
* Kicking
* Burning
* Pinching
* Pushing
* Grabbing

**2.4. Sexual Abuse:** Sexual abuse occurs when a person uses his or her power to involve another person in sexual activity. The term sexual abuse also includes non-contact sex acts, as well as exposure to pornography. Sexual abuse also includes sexual exploitation, which involves children engaging in sexual activity in exchange for things like drugs, food, shelter, protection, or money. It is important to note that sexual abuse is not only committed by an adult against a child, but can also be inflicted by another child or young person.

**2.5. Neglect:** Neglect is the failure to provide a child with basic care. This includes: food, water, shelter and supervision to the extent that a child is placed at risk. Emotional neglect is another serious form of neglect which cannot be left without consideration. Failure to provide a child with the attention and care that they need is a serious form of neglect which can seriously impact upon a child’s development.

**2.6. At Risk:** An ‘at risk’ child is any child who is vulnerable to abuse and exploitation. For example: children from poor families, children who live or work on the street, children who have been orphaned or abandoned may be at risk because they do not have the same access to protection as wealthier children, or children with constant parental supervision.

**2.7. Beneficiary:** Any person who receives a benefit from HHK, not including staff. This can be financial benefit but also extends to include all HHK program participants, whether they receive financial support or not.

**2.8. Child:** In accordance with the United Nations Convention on the Rights of the Child, the term ‘child’ refers to any person under the age of 18 years.

**2. 9. Child Carers:** At HHK the term ‘child carer’ specifically refers to HHK associates

in a care-giving role, meaning they live with the children and take care of them.

In 2016 HHKs Child Carers are:

● Foster Carers

● Emergency Carers

● Relief Carers

**2. 10. Child Protection:** Child protection is an initiative designed to protect children from all

forms of harm that may arise from abuse or neglect.

**2. 11. Child Protection Policy:** A Child Protection Policy is a clear set of rules and procedures, which aim to protect children from all forms of child abuse and neglect.

**2. 12. Child Protection Risk Management:** The steps that are taken to reduce the possibility

of child abuse occurring within an organization, this includes identifying existing risks within programs, facilities, and the communities they operate within and implementing

available steps to combat risk factors as well as possible.

**2. 13. Code of Conduct:** A code of conduct gives guidelines deemed to be appropriate

and proper behaviour for HHK associates when interacting with children involved in HHK’s work. The code of conduct is designed to protect children but is also intended

to protect HHK associates from accusations of inappropriate behaviour or abuse.

**2. 14. Child exploitation:** The use of children for someone else’s advantage, gratification

or profit often resulting in unjust, cruel and harmful treatment of the child. These activities

are to the detriment of the child’s physical or mental health, education, moral or social-emotional development.

**Examples include:** child labour, child bondage, the use of children in criminal activities.

**2. 15. Grooming:** The preparation of children before an act of sexual abuse occurs, which

involves the gaining of trust from the child. Grooming can involve the building of friendships and trust. Grooming can occur in everyday life as well as online.

**2. 16. Recruitment:** The process of hiring new staff, including advertising, selection,

interviewing, and reference checks.

**2. 17. Working with children:** Any person working in a position that involves regular contact

with children, either due to employment, or due to the nature of the work environment.

**3. Terms**

**3. 1. HHK Management** specifically refers to the Managing Director, the Governance Director and the Director of Operations.

**3. 2. The Human Resource Department (HR)** specifically refers to the Human Resources Coordinator and the Human Resources Technical Advisor.

**4. Guiding Principles**

The HHK Child Protection Policy is guided by the following three principles:

**4. 1. Zero tolerance of child abuse: HHK** does not tolerate any form of child abuse. HHK will not use the services of anyone either directly or indirectly who poses a risk to children.

**4. 2. Shared responsibility**: All staff, volunteers, visitors and others associated with HHK share responsibility in the protection of children across all of HHK programs and are required to report any instances of, suspicions of, or potential for abuse immediately.

**4. 3. Non-discrimination:** All children across HHK’s programs will be respected and treated with dignity.

**5. Responsibility for Implementation**

**5. 1. This policy applies to all associates of HHK:** all employees, volunteers, interns, partner

organization members, consultants, contractors and visitors. The term HHK ‘associates’

will be used in reference to all of the above. The Child Protection Policy applies to all HHK associates, as well as the operations of all of its programs, projects and facilities.

**5. 2. HHK’s Human Resources Department** is responsible for ensuring that the Child

Protection Policy is distributed among HHK associates.

**5. 3. HHK Management** is responsible for ensuring that the Child Protection Policy is under

stood by all HHK associates and that they all acknowledge their receipt of and responsibilities under the policy.

**5. 4. HHK Management** is responsible for ensuring that HHK’s Child Protection

Policy remains relevant and effective. HHK Management will consistently monitor all risks concerning the children in HHK’s programs and make any necessary changes to the Child Protection Policy.

**6. References and legislation**

The HHK Child Protection Policy acknowledges the following Cambodian, Australian,

and International policies and legislation:

● The United Nations Convention on the Rights of the Child (1992)

● MoSAVY Minimum Standards for Alternative Care (2008)

● Various sub-decrees and prakas authored by MoSAVY regarding care for children.

● Government of Cambodia. Cambodian Labor Law (1997)

Note: The abovementioned international policies and legislation are available to associates

to request any time from HHK’s Management.

**7. Child Protection and Risk Management Procedures: Code of Conduct**

The following guidelines outline what HHK deems to be appropriate and proper behaviour for HHK associates when interacting not just with children but with all beneficiaries of HHK. Throughout this Code of Conduct all HHK program participants whether child, young person, or adult will be referred to using the term ‘beneficiary.’ These guidelines are designed to protect both the children participating in HHK’s programs, whilst also protecting HHK associates from accusations of inappropriate behaviour or abuse. Please note: This is not an exhaustive or exclusive list. All HHK associates should avoid

actions or behaviour that may constitute poor practice or potentially abusive behaviour.

If an associate is unsure at any time, they should present their query to HHK Management immediately.

**7. 1.** All HHK associates must have their HHK identification displayed at all times, so that they are easily identifiable.

If you visit HHK, you must wear an identification badge

.

**7. 2.** It is essential that all HHK associates treat every beneficiary equally, with dignity and respect regardless of their ethnicity, religion, age, ability, gender, sexual orientation

and economic circumstances.

**7. 3. HHK** associates shall not engage in any acts of physical, sexual or emotional abuse or

exploitation, this includes but is not limited to:

● Kicking, pushing, hitting, slapping, pinching

● Threats of violence

● Sexual relationships with minors or any beneficiaries

● Viewing, making or distributing child pornography

● Behaving in a manner which is in its nature inappropriate or sexually provocative

● Using inappropriate or offensive language – directed towards or in front of a beneficiary

● Yelling at a beneficiary

● Making suggestions or offering advice which is inappropriate or offensive

● Speaking or behaving in a way intended to shame, humiliate, belittle or degrade a

beneficiary

● Showing differential treatment, or favouring particular beneficiaries to the exclusion of others

● Asking beneficiaries or staff to assist with personal jobs, such as running errands of a personal nature.

**7. 4. HHK** requires that all HHK associates maintain the confidentiality of all beneficiaries and their case related information.

**7. 5**. No beneficiary is to be taken to any HHK associates home or accommodation,

this excludes Foster Carers. For instances where travelling with a child that requires an overnight stay, please see **Section 6: Travel with a Child**

.

**7. 6.** Unless in the case of an emergency no HHK associate may enter the sleeping

space of a beneficiary, except those designated by HHK Management in the associate’s

HHK Position Description.

**7. 7.** No HHK associate shall condone, facilitate or participate in, beneficiaries behaving in a

way that is illegal or unsafe, including but not limited to: underage drinking, under-age

driving/driving without a license or drug use.

**7. 8.** No HHK associate should do things of a personal nature that a beneficiary

can do for themselves, such as assisting children who have the capacity to go to the bathroom, shower or change their clothes.

**7. 9.** Under no circumstance should any physical contact between a HHK associate

and a beneficiary be, or have the appearance of being, sexual in any way. HHK associates

must take extreme care when interacting physically with HHK beneficiaries.

HHK associates must not fondle, hold, kiss, hug or touch HHK beneficiaries in an inappropriate way.

**7. 10.** All HHK associates should take great care to ensure that they are visible when working with beneficiaries. In situations where staff are working one-on-one with a beneficiary, first priority must be given to a communal area. HHK associates

should protect themselves by not putting themselves in a situation where they are one-on-one with a beneficiary as far as is possible.

**7. 11.** As many of the beneficiaries HHK works with suffer attachment disorders, they will

often want to establish emotional relationships that are not appropriate for a HHK associate and a beneficiary. HHK associates must be alert to this and maintain

their professional boundaries. HHK associates are always considered responsible for his or her actions.

In the event that a HHK associate becomes aware of a beneficiary attempting to form such a relationship, either with themselves or a third party, it is the responsibility of the associate to report this to HHK Management immediately.

**7. 12**. Except for in the case of child carers, physical contact should be kept to a minimum

wherever possible to help to maintain professional boundaries.

**7. 12. 1.** It is common for child or young person to react to successes with an expression

of affection to a HHK associate, wherever possible associates should convey approval with

verbal encouragement and praise, rather than the use of physical contact such as a

hug. If a HHK associate is worried about a beneficiary forming an unhealthy attachment

with themselves or another HHK associate it should be reported to HHK Management

immediately so that the correct interventions can be introduced.

**7. 12. 2.** A beneficiary in distress may require comfort and reassurance in a manner that

would be provided by a parent, guardian or family member.

This contact must remain in an open environment and be in reaction to the distress,

it should not become unnecessary or with the same beneficiary over a period of time.

**7. 12. 3.** All HHK associates are required to be friendly to the beneficiaries HHK works with

however, at no time shall a HHK associate establish a genuine or adult friendship with a

beneficiary. As such HHK associates should not spend excessive time with any one beneficiary, nor shall they confide in or share information of a personal nature with a

beneficiary. Furthermore, HHK does not permit associates to socialize with beneficiaries

outside of what is outlined as a responsibility of their position, or outside of their scheduled work hours.

**7. 13.** When visiting other organizations, HHK associates are required to uphold not only the partner organization’s Child Protection Policy, but also HHK’s own Child Protection

Policy and Code of Conduct.

**7. 14**. Inappropriate conduct toward beneficiaries, including failure to follow the behavioural standards stated above is grounds for discipline, up to and including

dismissal from employment or placement and/or police notification and legal action.

**8. Child Protection and Risk Management Procedures: Personnel Recruitment and Screening:**

Recruitment for all positions, including volunteer and/or contracted work, will be assessed to help ensure that any potential risks are avoided, acknowledged and managed.

**8. 1.** Advertisements for job vacancies will make clear that HHK is committed to child protection and that the applicant’s commitment to child protection is a condition of employment.

**8. 2.** All applicants, both local and international, must provide HHK with a written application accompanying the applicant’s CV and a minimum of two professional

references before a candidate will be considered for a position.

**8. 3**. All applicants will be interviewed in person where possible, and via Skype where not. A minimum of two staff members will be present during an interview.

**8. 4.** During the interview process, applicants will be asked about their previous work with

children. All interviews must also include specific questions about the applicant’s understanding of child safety and protection as well as their motivations for applying to work with a children’s organization.

**8. 5.** Reference checks will be conducted on all successful applicants, both local and international. Applicant referees will be contacted and specifically asked if they have any

concerns about the applicant working or associating with children.

**8. 6.** Prior to employment with HHK, Khmer nationals must provide copies of their National

Identity Card, Police Certificate from their local police station as well as their signed HHK Child Protection Policy. If a National Identity Card is not available, the applicant

will provide an original Birth Certificate and their Family/Resident Book.

**8. 7.** All internationally recruited staff or volunteers must provide a copy of their valid passport, Child Safe children’s cards e.g.: Australian ‘Blue Card’, National Police/ Criminal Record Check or Working with Children Check from their home country, as well as a signed HHK Child Protection Policy prior to beginning their employment with HHK.

**HHK’s HR Manager is responsible for ensuring that each local staff member has a National Police Certificate from the Cambodian Ministry of Justice. HHK will cover the cost of these checks.**

 **Child Protection and Risk Management Procedures: Visitors to HHK**

To minimize the impact of visits on the children in HHK’s programs, HHK requires all visitors including donors and partner NGOS to participate in an official HHK Project Visit. HHK will not accept visitors who ‘drop in’ to a HHK project. The following guidelines are in place to minimize the risks that HHK could potentially encounter by allowing visitors to come into any HHK run facility.

**9. 1.**

HHK associates are not approved to take visitors to HHK’s projects unless listed below:

Alecia Damico

Trisha Simpson

Bora Mom

Eam Mom

Cherrub

**9. 2.** Visits to HHK’s programs should begin with HHK’s visitor education presentation

or discussion ensuring visitors understand the boundaries of the visit, the importance of Child Protection and that children are not tourist attractions.

**9. 3.** The approved locations for HHK Project Visits in 2016 are as follows:

● Village sustainable farming project

● Sammaki production building

● Happy Hub home

**9. 4.** Prior to commencement of the visit all Project Managers whose programs will be visited will be contacted and advised of which staff member is leading the visit and how many people will accompany them.

**9. 5** The visitor to leader ratio is 10:1.

**9. 6.** All visitors must present a photocopy of their passport or national ID and sign our Visitor Agreement Form. These documents are to be logged against the visitor in the HHK database. They will be given a HHK Visitor Pass, which must be worn around their neck and visible for the duration of the Project Visit.

**9. 7.** All visitors must be accompanied by their visit leader at all times. At no point will a visitor be left unaccompanied at a HHK facility.

**9. 8.** Interactions with children and interruptions of activities will be kept to a minimum,

visitors will not participate in any of the activities that may be taking place during their Project Visit, instead the purpose of the visit is for transparency, and to provide a deeper understanding of what HHK does and why. The HHK Project Visit is not an opportunity

for visitors to play with the children in HHK’s programs.

**9. 9.** Photographs are not to be taken on project visits. If visitors wish to have photos of HHK’s projects the project leader can request that approved images are sent. Photographs of visitors must also not be taken by HHK staff and published without the consent of the visitor.

**9. 10.** In the event that a visitor arrives at a HHK Project unaccompanied, relevant staff must not permit entry and shall contact HHK’s management immediately.

**9. 11. HHK**’s Project Visits do not go to private residences of HHK beneficiaries.

**Special Considerations**:

**9. 11. 1.** While no longer a HHK project, if a visiting supporter previously donated the funds

for the construction of a family home, and the family gives their permission, that donor

will be able to see the home that they donated, however in this case the donor will be taken on a separate Project Visit.

**9. 11. 2**. If a representative from an external organisation, including partner organisations,

requests to visit a beneficiary’s home, including a HHK Foster Family home, written approval must be given by HHK Management in advance. HHK Management

has the right to refuse requests of this nature.

**9. 12.** Should visitors arrange their own transportation for the HHK Project Visit, drivers are

welcome to join the Project Visit however must follow normal Visitor Protocols, as outlined

above. If they do not adhere to the aforementioned, they will be required to wait outside HHK’s facilities for the duration of the visit.

**9. 13**. Requests to film and/or take photographs of HHK’s beneficiaries and/or programs

must be submitted in writing. The request must detail what is to be filmed/photographed,

on what date and expressly what the material will be used for. If HHK’s management

decides that the content, purpose and informed consent for the material is appropriate

they may give detailed approval in writing. The privacy and dignity of HHK’s beneficiaries

is paramount, and HHK reserves the right to withdraw this permission if circumstances

are deemed to be inappropriate.

**9. 14. HHK** will not include visits to the sites of our partners without formal approval

from HHK Management and also the partner’s management team.

**9. 15**. When visiting Happy Hub– the group leader must sign into the visitors’ book, state the number of group members, and upon leaving sign out again confirming all visitors are departing together.

**10. Child Protection and Risk Management Procedures: Donor Communications**

The following guidelines are in place to minimise the recognised risks associated with HHK’s fundraising and promotional work.

**10. 1.** All visits with current, past or potential donors must be carried out in line with the visitor protocols of this Child Protection Policy. At no time will visitors be left unaccompanied while at a HHK facility.

**10. 2.** The location of all HHK beneficiary homes and contact details will be kept confidential from donors for privacy and safety reasons.

**10. 3**. There will be no direct communication arranged between a HHK donor and a HHK

beneficiary. Where direct contact relationships exist’s already (for example adult beneficiaries and donors in contact via Facebook) HHK beneficiaries must be assured that they are under no expectation to communicate with that donor, and be encouraged

to discuss any concerns with a HHK team member.

**10. 4.** Sharing by HHK of individual information of beneficiaries must be done in line with HHK’s Informed Consent and Identity Protection procedures.

**10. 5**. HHK Management may use their discretion in administering the above policy to ensure the best interests of the children and families in our programs.

**11. Child Protection and Risk Management Procedures: Donor Communications**

HHK shall ensure information and images of children and beneficiaries are always managed in a respectful and appropriate manner. Any images made public will never be used in a way that places a child at risk of harm, or exploitation. The following steps will be taken when publishing images or personal information (includes Website, social media, E-Newsletter, Supporter Updates and other publications):

**11. 1**. Children and beneficiaries must be portrayed in a respectful manner:

**11. 1. 1.** Publishing images of people in a state of distress will be avoided.

**11. 1. 2. HHK** will never take or use an image of a child or beneficiary if they are not

dressed.

**11. 1. 3.** Children will never be portrayed in a way that could be seen as sexually

suggestive.

**11. 2.** All images taken of children will be made available to the child and their guardian/

care-taker upon request.

**11. 3.** Families who decide not to grant permission for images of their family members to

be taken will be reassured that the support they receive from HHK will not be impacted

in any way.

**11. 4.** Children always have the right to request that their image is not taken regardless

of a parent or guardian giving their permission.

**11. 5.** A pseudonym will be used if a name is required to accompany an image.

**11. 6**. For instances where a child’s safety would be compromised if their location is revealed, HHK will not publish their image.

**11. 7.** Images of children affected by serious illness will not be published which identify the

child as being so affected, in order to protect the child’s right to privacy.

**11. 8.** For all children and beneficiaries HHK must have informed consent from the children’s guardian before photographs or video footage may be taken, and those images used in KKH’s internal and external publications.

**12 Child Protection and Risk Management Procedures: Travel with Children:**

HHK is committed to ensuring that all children are protected from abuse or neglect whenever they travelling outside of, or between, their regular HHK Programs. The following guidelines exist so that HHK minimizes the risks to children participating in HHK related travel.

**12. 1.** No HHK associate may take a child involved in a HHK program to their home, please note: this excludes Foster Carers.

**12. 2.** Every HHK owned vehicle has a maximum capacity of passengers that relates to the

number of seats in the vehicle. The driver of the vehicle is responsible for ensuring

the number of passengers is not in excess of the number of seats.

**12. 3.** No HHK associate may take children out for recreation/meals. This excludes

Foster Family outings, HHK Management pre-approved excursions and outings undertaken as part of HHK’s Family Connection or Reintegration Program for children in HHK Foster Care.

**12. 4.** Unless in the case of an emergency, only drivers who have the responsibility

delegated in their HHK Position Description are permitted to drive children engaged

in HHK’s programs. When travelling with children, the designated driver must be wearing their HHK Staff ID and ensure that it is clearly visible.

**12. 5.** In situations where non-designated staff members are required to drive children they

must hold a current and valid license and have advanced approval by HHK Management,

they must also ensure that they are wearing their HHK Staff ID and that it is clearly visible.

**12. 6**. Drivers are responsible for ensuring that the following rules are adhered to ensure that the risks to children when travelling are minimized. If one of the following rules are not adhered to it is the ultimate responsibility of the driver and they will be subject to disciplinary action including but not limited to official written warnings and dismissal:

**12. 6. 1**. Motorbike Travel

**12. 6. 1. 1.** All passengers must be wearing a size appropriate motorbike helmet.

**12. 6. 1. 2.** There must never be more than two adults on a motorbike at any time

passenger number may not exceed three.

**12. 6. 1. 3**. Children may never sit in front of the driver.

**12. 6. 1. 4.** Babies and children under 5 must be transported by HHK via tuk tuk

or car, not on HHK motorbikes.

**12. 6. 2.** Tuk Tuk Travel

**12.6. 2. 1.** For safety reasons the HHK Foster Home program will be provided

with tuk tuk’s for transporting young children, or the budget to allow travel via

tuk tuk rather than by motorbike.

**12. 6. 2. 2**. The total number of passengers may never exceed 8. However, passengers are limited to the number of passengers who can sit down comfortably

on the tuk tuk original seats.

**12. 6. 2. 3.** No passengers are allowed to stand in a moving tuk tuk.

**12.6. 2. 4** Passengers must always sit on the tuk tuk original seats; no passengers

may sit on the floor, steps, rails and the front of the tuk tuk or on the tuk tuk’s

motorbike.

**12. 6. 2. 5**. No additional seating may be added to the tuk tuk so as to allow for

the transportation of more passengers

**12. 6. 2. 6**. No passengers are permitted to travel on another passenger’s lap

(with the exclusion of children under age 5 who for safety reasons may need to

be carried).

**12. 6. 3.** Car/Van Travel

**12. 6. 3. 1.** When seat belts are available, they must be worn.

**12. 6. 3. 2**. There may only be as many passengers as there are seats in the

vehicle i.e. Tuk Tuk, car, van, taxi, bus, etc.

**12. 7.** Designated drivers must not travel alone with children after 6pm; if travel is required

the child must be accompanied by a guardian or care-taker. In the event of an emergency,

and the child’s guardian or care-taker cannot be found, HHK Management must be notified immediately. Staff badges must be worn and clearly visible.

**12. 8.** In cases where children must travel via moto, taxi or tuk tuk they must be accompanied by a guardian, care-taker, HHK social worker or HHK Medical Program staff. HHK will never put a child under 16 in or on a vehicle unaccompanied.

**12. 9**. For out of town travel, children are required to be accompanied by a family member,

care-taker or guardian. If a HHK associate is also in accompaniment, and an overnight stay is required, the HHK associates must have their own separate room.

**12. 10.** When travelling back to hometowns, children and young adults in HHK’s Foster Care program must be collected by a family member who is over the age of 18.

**12. 11.** In the event that a child and their family member are travelling for medical reasons HHK will send a Medical Outreach Program member as required. If an overnight stay is required at hospital, and the presence of a member of the HHK Medical Outreach

Program is necessary, a parent or guardian must be present at all times. Unless in extreme cases, the HHK Medical Outreach Program staff member will sleep in a guesthouse or hotel.

**13. Child Protection and Risk Management Procedures: Supervision**

The adequate supervision of children in HHK’s programs is essential in ensuring that children are protected from harm, abuse or exploitation.

**13. 1.** A thorough risk assessment must be conducted by HHK Management in cooperation

with the specific Program Manager(s) on each HHK facility and program, and made available to all relevant HHK associates. These risk assessments will include requirements

to ensure that these risks are properly managed. These risk assessments are never viewed as complete and must constantly be assessed and evaluated, all risk assessments will be amended as new risks are identified and distributed to the relevant HHK associates.

**13. 2.** Children may never be left alone in any HHK facility.

**13. 3**. HHK associates must never be left alone with a child at any HHK facility (this excludes

HHK Foster Family homes and Emergency Care homes).

**13. 4.** Bathrooms and change areas must be monitored by designated staff members to ensure that only one child goes into each cubicle or space at a time, children cannot share a cubicle and no HHK associate or member of the public may enter the cubicle with a child, unless otherwise agreed upon with HHK Management.

**13. 5.** For children under 5 who are unable to use bathroom and shower facilities on their own HHK requires one staff member to assist them within the view of a second staff member, doors must always be left open to protect the child, as well as the staff member assisting them from accusations of inappropriate behaviour or abuse.

**13. 6**. Store rooms, classrooms, toilets, office rooms also pose a significant threat to child

safety as it is difficult to see who is in there and what they are doing. To minimize

the risks that such spaces pose to children, these rooms must be locked when not in use.

**13. 7.** Areas with water must be properly monitored. This includes laundry areas and water

storage areas. Children doing their laundry must be supervised and the water thrown out

when the task is complete, water storage pots must have lids on the to prevent children from accidentally falling in.

**13. 8.** The risk of outsiders entering a HHK facility is high, especially for programs with pen

door policies. Facilities without a security guard at the gate must have their gates closed once all children have arrived and the program/classes have begun. HHK Foster Family homes must be locked from within at night to ensure that the safety of the children is maintained.

**13. 9.** In the event that a non-staff member or program participant enters or attempts to enter a HHK facility, the project staff must refuse entry and report to their Project Manager

immediately.

If necessary, Program Managers should call HHK Management for assistance.

**14. Child Protection and Risk Management Procedures: Vocational training for young people**

HHK must take particular care when placing young people in vocational training programs. To manage the risks associated with vocational training placements HHK must adhere to the following guidelines:

**14. 1**. Associates involved in seeking employment and vocational training for young people

must follow the regulations laid out under the Cambodian Labor Law (1997)

**14. 2.** The vocational training participant’s Social Worker is responsible for conducting

monthly meetings with the vocational training participant and completing the HHK Vocational Training Support Form with them to ensure that they feel safe and comfortable

in their workplace or training program.

The completed form must be kept as a record of these meetings in the young person’s

case file. Social Workers must encourage these young people to speak up about their feelings and give them an opportunity to raise any concerns they may have.

**14. 3.** The vocational training participant’s Social Worker is also responsible for conducting monthly meetings with the vocational training participant’s teacher/trainer

and completing the HHK Vocational Training Evaluation with them. The completed form must be kept as a record of these meetings in the young person’s case file.

**15. Child Protection and Risk Management Procedures: Partner organizations**

**15. 1. HHK** will only partner with organisations committed to the protection of children.

The partner organization must have:

**15. 1. 1.** A written Child Protection Policy which is congruent with HHK’s Child protection Policy;

**15. 1. 2**. Provide a copy of official registration papers;

**15. 1. 3.** Provide copies of any additional partnership agreements with relevant from

government ministries.

**15. 2**. If the potential partner organization does not meet these requirements, HHK will not

enter into a partnership of any kind.

**16. Reporting Procedures: Raising and reporting concerns of child abuse**

It is mandatory for any breach of HHK’s Child Protection Policy to be reported immediately to either:

**16. 1.** The HHK associate receiving the disclosure must have fully documented the allegation, including the time, place, witnesses using HHK’s Incident Report Form within 24 hours of the disclosure. This Incident Report Form can be requested from HHK Management, HHK Human Resource Department and all HHK Project Managers.

This report will may be used in court if charges are forthcoming.

**16. 2.** Following the incident reporting HHK Management will consult with legal counsel to

ascertain due process and steer participants accordingly, subject to the incident reported.

Physical and/or sexual abuse of a child is a crime. HHK is to notify authorities when there

are reasonable grounds for reporting abuse. Allegations made in Cambodia will consider

national legislation and will follow legal procedures to investigate and address the allegations.

**16. 3.** Internal investigations will be confidential, thorough, impartial and will ensure prompt process. The investigation may consist of interviews with witnesses and others as

appropriate, collection of information about the alleged abuse, gathering of documentation, or other procedures as appropriate. The individual alleged to have abused a child will have the opportunity to present their view of the events in question.

HHK will hold its determination until the investigation is completed.

**16. 4.** The family of the victim will be informed of the allegation and action proposed and

they will be consulted where possible as to the process to be followed. This process will be

steered and guided by HHK Management.

**16. 5.** Children who have been subject to abuse will be referred to counselling, and reassured that they are not to blame. Every effort will be made to assist the child in coping with any physical or emotional trauma he or she may be experiencing.

**16. 6.** Any investigation of abuse will respect the privacy of the child/children,

and information about the abuse should not be shared with other children,

so as to protect a child’s right to confidentiality.

**16. 7. HHK** is responsible for providing an immediate response that protects the child from further potential abuse or victimisation. The best interests of the child/young person may warrant the standing down (suspension from duty) of an associate while an investigation

is ongoing. Paid associates stood down will receive full pay and are entitled to a just process that does not presuppose guilt or innocence.

**16. 8.** Confidentiality is crucial to a fair and effective investigation process. Confidentiality

protects the child, the notified, the respondent and the organisation, and ensures a fair and proper process.

**16. 9**. HHK associates who report a suspected violation of the policy shall be protected.

HHK will not tolerate any form of coercion, intimidation, reprisal or retaliation against any HHK associate who reports any form of abuse or exploitation, provides any information

or other assistance in an investigation.

**16. 10**. In the event of an allegation made in good faith, which is shown to be untrue, no action will be taken against the maker of the allegation. Any malicious allegations are not acceptable.

**16. 11.** Failure to report a suspected violation of HHK’s Child Protection Policy shall be subject to disciplinary measures, including suspension and termination.

**17. Strategies to support open communication and reporting of concerns:**

**17. 1.** All HHK facilities will have a reporting box. This box will be fixed to the wall and will

be locked. Two designated staff members will be the only members of HHK with access

to the reporting box keys, and they are responsible for collecting the contents of the boxes

weekly. This is to be conducted while the children are not present. The reporting boxes

provide a safe opportunity for children to report any concerns, including any suspected

or known abuse. All letters will be collected, numbered and kept on file, with a report made to HHK management at the end of the day. HHK’s Child and Family Service Manager must sign the report and provide a copy to the relevant social worker of the corresponding project for them to follow up on any issues raised, the other signed copy of the report will remain on file at HHK’s Head Office.

**17. 2.** For children in HHK’s Foster Care program, the Foster Care Social Worker will hold weekly family meetings, where children are encouraged to talk about feelings, and concerns, as well as achievements and successes. The children’s foster parents will not participate in these particular family meetings.

**17. 3**. HHK Management and HHK Project Managers are responsible for ensuring that a culture of openness exists within each HHK project team so that each associate feels

supported to raise and discuss any of their concerns regarding child safety.

**17. 4.** All project Managers are responsible for reminding their respective teams of the

requirement to report abuse or suspected abuse, at least once per month during the

projects staff meeting. During this meeting team members must be reminded to be

constantly assessing their workplace to identify risks that may put children in harm’s way

or expose them to abuse or exploitation. When a risk has been identified it should be reported to HHK Management immediately so that their project’s HHK’s Risk Assessment can be amended and a solution identified. By holding these meetings

minimum once per month it encourages HHK associates to be aware of situations

that present risks within their project and to manage these.

For example, ensuring that storage rooms are locked when not in use, managing

‘blind spots’ etc.

**17. 5.** All Project Managers are responsible for talking to the children in their project about

the issue of child safety and protection and encouraging them to raise any concerns.

HHK aims to empower the children by talking to them about their rights as well as what is and isn’t acceptable and encouraging them to raise any concerns.

**17. 6**. All Project Managers are responsible for making sure that children know what to do

when there is a problem.

**17. 7. HHK** Management is committed to ensuring that there is accountability so that bad

practices and/or behaviour don’t go unchallenged.

**18. Staff Training and Promotion of the Child Protection Policy:**

**18. 1. HHK**’s Child Protection Policy will be reviewed at least one time per year, two copies of the updated policy will be provided to all HHK associates, with their signature

acknowledging receipt of the policy, one will be kept on file at the HHK office and the other is for the associate to keep so that they can review and reference at any time.

**18. 2**. All associates will be provided with child protection training, at least one time per year. Where possible HHK will time the child protection training with the implementation

of the updated Child Protection Policy.

**19. Monitoring and evaluation of the Child Protection Policy:**

This Child Protection Policy will be reviewed a minimum of one time per year by HHK Management. At that time, the systems and procedures outlined in the policy will be reviewed and opportunities for improvement will be actioned.

**DECLARATION OF COMMITMENT**

This policy is to be signed by all HHK associates. A signed copy will be given to each HHK Associate, with another signed copy kept in the HHK Administrative Office personnel files.

**I declare that:**

1. I have read and understand HHK’s Child Protection Policy and Code of Conduct

2. I will comply with the policies and procedures laid out in the HHK Child Protection Policy.

3. I have not been accused or convicted of any offense involving physical, sexual, or emotional abuse of children.

4. I understand that if a complaint is brought against me regarding the abuse of children while employed by or engaged with HHK, my employment/engagement will be suspended while the allegation is thoroughly investigated in cooperation with the appropriate authorities.

Name

(Printed)

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Signature:

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