

CHILD PROTECTION POLICY & PROCEDURE MANUAL

2021

SUBJECT: CHILD PROTECTION POLICY

OBJECTIVE: The policy is to demonstrate the commitment of International Needs Ghana to the welfare of children and to protect them from all forms of abuse (intentional and unintentional) and exploitation. The policy is our declaration of intent to protect children from all forms of abuse. Child abuse in whatever form is totally unacceptable to INGH and its global partners. INGH shall encourage its staff and volunteers to actively participate in building and maintaining a safe environment for children.

DIRECTED AT: Board of Directors, Employees /Staff of INGH, Volunteers, Facilitators, Partners, Contractors / Consultants and Supporters/Donors. All these categories of persons share in the responsibility to take every precaution to protect the children and families we serve from abuse.

POLICY STATEMENT: INGH is committed to keenly protecting children from harm and ensuring children's rights to protection become a reality. INGH will take seriously the responsibility to promote child safe practices and protect children from harm, abuse, neglect and exploitation in any form. These include ensuring the protection of children from online abuse. In addition, we will take actions to prevent child abusers from becoming involved with INGH and take strict measures against anyone who comes under the scope of this policy who abuses a child. Our decisions and actions are in response to child protection concerns and will be guided by relevant laws of Ghana¹.

¹ These include the Constitution of Ghana (1992), Children's Act 1998 (Act 560), the Human Trafficking Act 2005 (Act 694), and the Domestic Violence Act 2007 (Act 732), Criminal Code of Ghana,

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1.0 Introduction

International Needs Ghana (INGH) is a global partner of a worldwide partnership of Christian organizations fulfilling the commission of Jesus Christ, supporting each other to see transformed lives, families and communities. The goal of INGH is to promote human and community development, for the relief of socio-economic problems and cultural injustice, with a focus on women and children.

INGH recognises that human rights apply to all age groups; it also recognises that children have the same human rights as adults. Children and women are particularly vulnerable, thus the need to apply particular rights that recognize their special need for protection consistent with international best practices. Agencies whose work bring them into contact with children need a child protection policy to ensure that their activities conform to international conventions and national laws that protect children and also to ensure that their work do not expose children to harm. It is in this regard that INGH has formulated this child protection policy to ensure that its practices and operations promote and protect the rights of children. INGH believes that how we care for the most vulnerable in society is an outward expression and evidence of our love for God and all His creation.

1.1 Definitions

The policy shall adopt the following working definitions for key concepts:

1.1.1. A child is defined as any person under the age of 18 years.²

1.1.2 Child Abuse is defined as all forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial or other exploitation of a child³ and includes any actions that result in actual or potential harm to a child⁴.

Forms of Abuse

² (UNCRC 1989, ILO Convention 182, Children's Act 560, 1998).

³ Refer to IN Ghana – Child Protection Policy and Procedures for further guidance on categories of abuse

⁴ WHO 1999

- **Sexual abuse** signifies forcing or enticing a child to take part in or have any form of association with/exposure to, sexual activities, whether or not the child is aware of what is happening.
- **Physical abuse** means a deliberate physical injury or the wilful or neglectful failure to prevent physical injury or suffering.
- **Emotional abuse** can be defined as the persistent ill-treatment of a child through the use of words that cause adverse effects on the child's emotional development.
- **Neglect** refers to the persistent failure to meet a child's physical and/or psychological needs, likely to result in harm to a child's protection and wellbeing.
- **Child Online abuse:** This form of abuse is virtual and involves sending electronic messages to a child with the intention of gaining access to the child to exploit his/her vulnerability. Online abuse can occur in many forms such as cyber bullying, cyber stalking, cyber grooming, sextortion and sexting among others with negative consequences for the child.

Child abuse may be a deliberate act or it may be failing to act to prevent harm. Child abuse consists of anything which individuals, institutions or processes do or fail to do, intentionally or unintentionally, which harms a child or damages their prospect of safety and healthy development into adulthood.

1.1.3 Child Protection, within the scope of this policy, is defined as the responsibilities, measures and activities that INGH undertakes to safeguard children from both intentional and unintentional harm. INGH views child protection both as a corporate and an individual responsibility.

2.0 Commitment to Child Protection

INGH affirms its commitment to oppose all forms of child abuse and to continuously strengthen its child protection processes to mitigate the risk of abuse within our programs. Staff and other persons who come under the scope of this policy must be aware that INGH will sever all relations with anyone whose behaviour is proven to have committed child abuse or constitute a breach of the child protection policy.

To this end, INGH has a zero-tolerance stance for child abuse. INGH will create a child-safe organisation by:

- Screening and providing orientation information to all individuals and groups visiting projects including staff, volunteers, Board members, contractors, sponsors, donors and ambassadors.
- Being vigilant in protecting confidential information about children and their families.
- Ensuring thorough recruitment and screening processes, which include criminal record and verbal referee checks, prior to the engagement of all staff and volunteers.

- Ensuring Child Protection training for relevant personnel, particularly upon induction and prior to overseas visits.

2.1. Code of Conduct/Behaviour Protocols

The following shall serve as a code of conduct⁵ on child protection for every person who shares in the work of INGH including staff, volunteers/facilitators, contractors and donors. This shall be signed by all the persons referred to above.

I, [insert name], acknowledge that I have read and understood the Child Protection Policy of International Needs Ghana and agree that in the course of my association with International Needs Ghana, **I shall**

- treat children with respect regardless of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status
- not use language, gestures or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- not engage a child in any form of sexual activity or acts e.g., fondling, kissing, showing pornography, harassment and defilement, including paying for sexual services or acts, which are an offence under relevant laws (Children's Act 1998, Act 560, Criminal Code of Ghana).
- where possible, ensure that another adult is present when working in the proximity of children.
- not invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger in which case my supervisor should be informed immediately.
- not sleep in the same room or bed with a child I am working with unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
- not use any computers, mobile phones, video cameras, cameras or social media inappropriately to exploit or harass children or to access child pornography and other child exploitation material through any medium.
- not engage in child marriage (marriage to anyone under the age of 18), not give any child under my care to be married nor give consent as a witness to any marriage involving a child as one of the partners. Child marriage is a criminal offence in Ghana (Children's Act 560, The Criminal Code, 1960). As per the

⁵ Extracted from IN Ghana Code of Conduct

definition of child marriage, anyone under the age of 18 is not able to give or withhold consent and is considered a form of sexual violence.

- refrain from engaging in cyber stalking, cyber bullying, cyber grooming, sextortion and sexting among others of a child or which involves a child or is about a child.
- refrain from hiring children for myself, friend or relative for domestic or other labour forms which is inappropriate given their age or developmental stage, which interferes with their time available for educational and recreational activities, or which places them at a significant risk of injury.
- report concerns or allegations of child abuse in accordance with appropriate procedures.

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, **I shall:**

- before photographing or filming a child, assess and endeavour to comply with conditions or restrictions for producing personal images
- before photographing or filming a child, obtain consent from the child or a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
- ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as destitute or sexually suggestive.
- ensure images are honest representations of the context and the facts.
- ensure file labels do not reveal identifying information about a child when sending images electronically.
- Ensure that where children are victims of abuse, faces of such children would be blocked or shielded in a way to disguise their identity and ensure their protection.

3.0 Ethical Principles

- All INGH staff, Board members, volunteers, agents and contractors are obligated to report any suspected or alleged breaches of the Child Protection Code of Conduct, either in Ghana or overseas.
- The dignity and rights of every child is to be respected in every circumstance.
- In interviewing and reporting on children special attention is to be paid to each child's right to privacy and confidentiality, to have their opinions heard, to participate in decisions affecting them and to be protected from harm and retribution, including the potential of harm and retribution.
- The best interests of each child are to be protected over any other consideration, including over advocacy for children's issues and the promotion of child rights.

4.0 Reporting

The following requirements apply in relation to the reporting of suspected abuse or a suspected breach of the Child Protection Code of Conduct:

1. All INGH Board Members, staff, contractors and volunteers are required to immediately notify INGH's Executive Director or his designate if any of INGH's personnel working on or visiting INGH projects are accused/suspected of, charged with, arrested for or convicted of criminal offences relating to child exploitation and abuse. INGH donors, supporters and visitors are encouraged to follow similar protocols.
2. The INGH Board authorises the Executive Director or his designate to receive such reports. The Executive Director should notify the Board of all allegations of child abuse within 24 hours. In the event that the allegation relates to the Executive Director, the Chair of the Board of INGH shall be notified immediately.
3. Any person making such a report should NOT:
 - Notify the person to whom the claim or allegation relates
 - Seek to independently investigate or substantiate the claim prior to making any notification. The emphasis is on immediate and mandatory reporting.
4. The responsibility to follow up the report and to liaise with relevant investigating authorities' rests with the INGH Executive Director (where the accused is from or associated with INGH) or the partner CEO (where the accused is not from or associated with INGH). Alternatively, such responsibility lies with the Chair of the INGH Board or the partner organisation, as the case may be.

5.0 Procedure Guidelines

5.1 *Introduction*

The Child Protection Policy outlines the organisation's commitment to the welfare of children and their protection from abuse and exploitation. An effective policy, however, cannot guarantee the security of a child, and as such it is necessary to have in place, strong procedures outlining INGH's system of recruitment, incident reporting, staff and volunteer responsibilities, and policy reviews. The following procedures apply to all Board members, staff, contractors, interns and volunteers of INGH (hereafter referred to as 'representatives').

Every person working or volunteering on behalf of INGH is responsible for helping to protect children from harm, exploitation and abuse. Employees and volunteers must therefore be very familiar with these procedures and must ensure that they implement these procedures in accordance with their broader roles and duties.

5.2 Purpose of Guidelines and Procedures

These guidelines and procedures have been developed to facilitate the integration of child protection into all INGH's work and processes in line with its policy on child protection. The broad areas are Human Resource, Communication, Child Protection, Incident Management, Risk Assessment in Operations and Programs, Administration and Management Responsibilities.

5.3 Scope of Integration of Child Protection Policy

5.3.1 Human Resource

Recruitment and Selection

INGH shall within three months of the coming into force of this policy streamline its recruitment processes to ensure a child-safe process. In this regard, prior to engagement, targeted interview questions and verbal referee checks would be conducted on all personnel (including volunteers) who will come into contact with children in the course of their work. This is to deter possible child offenders from gaining entry into the organisation.

- a. Job Announcement⁶** - All job announcements shall have a statement that expressly indicates INGH's commitment to child protection. The job design shall define the level of contact which a position/role may have with children. This shall determine the selection of measures appropriate to the level of contact which will structure the content of the job description as well as indicators for performance management.

Two different levels of contact shall be applied as follows:

Level One:

The responsibilities of the position do not require the post holder to have any one-to-one contact with children on a daily basis. Some Head Office Administration staff shall fall within this category.

⁶ See Appendix 1 for sample Job Advert statement and interview questions

Level Two:

The responsibilities of the post require the post holder to have one-to-one contact with children. All frontline / community field staff fall within this category.

b. Interview

International Needs Ghana's policy on child protection will be discussed openly and comments invited. Behavioural-based interviewing may be used to determine an applicant's past behaviour in specific situations.

c. Reference Checks

At least two phone reference checks will be carried out, one of which should be work-based. The interviewer should specifically discuss whether INGH should have any reason to be concerned about the applicant working with children or with child-sensitive material.

d. Pre-employment Checks

Applicants should be required to:

- Provide verified academic transcripts of qualifications.
- Provide a detailed work history and account for any identified gaps.
- Show two forms of identification, at least one with a photo.
- Sign a declaration form disclosing full details of any criminal convictions, criminal proceedings pending against them, and other information which INGH ought to be made aware of, regarding child protection
- Prior to confirmation of employment, provide a Criminal Record Check from the Police and thereafter. Provide Police Criminal Record check within the probation period (three months before his/her appointment is confirmed)

e. Employment Contract

The preferred candidate will be required to sign the INGH *Child Protection Code of Conduct* as part of the contract of employment. The employment contract will also specify that a proven breach of the Code of Conduct may lead to disciplinary action, including dismissal.

f. Orientation

All new staff employed, interns and visitors shall undergo an orientation /briefing on Child Protection. INGH's Child Protection Policy and relevant CP documents shall be explained and made available for new employees, interns and visitors to read and acknowledge.

During Employment

a. Training

All INGH personnel shall be given a Child Protection Policy induction by the People and Culture Manager. The induction should include a discussion regarding the responsibility of INGH and the individual, to build and maintain a child-safe

organisation, and appropriate behaviour when interacting with children or child-sensitive material.

All staff or others involved in visiting INGH projects must be given education regarding appropriate behaviours when interacting with children. These behaviours are described in the INGH *Child Protection Code of Conduct*, which needs to be agreed to and signed by staff or others travelling to project communities. They shall also be educated on the appropriate procedure to follow should a situation occur where there is abuse or suspected abuse.

b. Reporting

All staff must be made aware of their individual responsibility to uphold the INGH Child Protection Policy and Code of Conduct. Any member of staff who discovers or suspects abusive practices must refer the matter immediately and in confidence to his/her head of department or the Executive Director. Any verbal information and written documents relating to allegations of child abuse are necessarily confidential in nature.

During employment, should an employee display behaviour which contravenes the Code of Conduct or other unusual behaviour with respect to a child, giving rise to concern, this must be discussed with the Executive Director who, shall report to the police for further action.

As in any internal investigation, principles of natural justice and procedural fairness will be followed.

c. Visits to Projects

- Sponsors/donors must be accompanied by a local INGH staff member at all times during the visit
- Staff/contractors/volunteers/sponsors/donors/guests should not visit a child's home or spend time with the child unsupervised
- Staff/contractors/volunteers/sponsors/donors/guests should not take a child to their hotel room/accommodation
- Staff/contractors/volunteers/sponsors/donors/guests are prohibited from asking for, or accepting, accommodation from the family of an INGH sponsored child
- Staff/contractors/volunteers/sponsors/donors/guests should be culturally sensitive and should not fondle, kiss, hold, cuddle or touch minors in an inappropriate or culturally insensitive way
- Staff/contractors/volunteers/sponsors/donors/guests should avoid flirting, unwelcome flattering, or making suggestive comments to minors
- Staff/contractors/volunteers/sponsors/donors/guests should not give any personal contact information to an INGH sponsored or ask for the child's contact information

Inappropriate or otherwise suspicious behaviour on the part of the staff/contractors/volunteers/sponsors/donors/guests toward any child shall be addressed immediately.

d. Child Protection Oversight

All INGH's representatives are responsible for protecting children from harm, exploitation and abuse. However, there are certain roles within the organisation responsible for ensuring oversight of the implementation of INGH's Child Protection Policy and procedures.

These positions are as follows:

1. The Executive Director:

- a. Attends to all Child Protection concerns brought to his/her attention, including allegations or suspicions of code breaches and/or abuses purported to have been committed by an INGH representative, sponsor/donor/supporter. (In the event that the Executive Director is the subject of an allegation, the INGH Board Chair must assume this role.)
- b. Monitor the procedural implementation of the INGH Child Protection Framework and undertake strengthening as deemed necessary.
- c. Ensure a broad understanding and adherence to the INGH Child Protection Policy and Procedure is updated every five years, or earlier were deemed necessary.
- d. The Executive Director may designate a senior management staff to perform these roles

2. INGH Board:

- a. The Board is to act as a point of reference for any Child Protection issues arising within INGH.
- b. The Board (via the Executive Director, or the Chair if need be) will be continually updated on any Child Protection cases involving INGH representatives or sponsors/visits and advise the Executive Director (or Board Chair) in decision-making.
- c. The Board will be responsible for approving the continuous improvement of INGH's Child Protection Policy.
- d. The Board (via the Program Planning & Resource Mobilisation - PPRM Sub-Committee) will receive reports concerning the capacity of INGH to implement effective and compliant child protection policies.

5.3.2 Communications

Information on the Child

INGH is committed to protecting the safety of all children in its sponsorship programs and those with an association to project activities.

Sponsorship management protocols are established to ensure that:

- Child details/images are maintained in a secure and regulated environment

- All staff members/volunteers with access to child details/images undergo appropriate security vetting
- All correspondence between children and sponsors is centrally monitored for appropriate content
- Program locations are generalised.

Reporting about children

INGH is aware that any information on children may be misused deliberately by people acting in bad faith. Thus, in our communications pertaining to children, we are guided by 'UNICEF's *Principles for ethical reporting on children*'. These principles apply both to material intended for public distribution as well as for internal use only.

Principles for ethical reporting on children

All INGH staff, volunteers, agents and contractors should be informed appropriately on INGH principles for ethical reporting.

a. *Principles*

- The dignity and rights of every child are to be respected in every circumstance.
- In interviewing and reporting on children, special attention is to be paid to each child's right to privacy and confidentiality, to have their opinions heard, to participate in decisions affecting them and to be protected from harm and retribution, including the potential of harm and retribution.
- The best interests of each child are to be protected over any other consideration, including over advocacy for children's issues and the promotion of child rights.
- Those closest to the child's situation and best able to assess it are to be consulted about the political, social and cultural ramifications of any reportage.
- Do not publish a story or an image which might put the child, siblings or peers at risk even when identities are changed, obscured or not used.

b. *Guidelines for interviewing children*

- Do no harm to any child; avoid questions, attitudes or comments that are judgemental, insensitive to cultural values, that place a child in danger or expose a child to humiliation, or that reactivate a child's pain and grief from traumatic events.
- Do not ask children to tell a story or take an action that is not part of their own history.
- Explain the purpose of the interview and its intended use.
- Obtain permission from the child and his or her guardian for all interviews, videotaping and photographs.
- Pay attention to how the child is interviewed. Try to make certain that children are comfortable and able to tell their story without outside pressure. Ensure that the child would not be endangered or adversely affected by showing their home, community or general whereabouts.

c. *Guidelines for reporting on children*

- Do not further stigmatise any child; avoid categorisations or descriptions that expose a child to negative reprisals.
- Always provide an accurate context for the child's story or image.
- Always change the name and obscure the visual identity of any child who is identified as a victim of abuse, a perpetrator of abuse or HIV positive.
- Where necessary, change the name and obscure the visual identity of any child who is identified as a child combatant, an asylum seeker, refugee or internally displaced person.
- Where it is in the child's best interest to disclose his/her name and/or image, they must still be protected against harm and supported through any reprisals.
- Confirm the accuracy of what the child has to say.
- When in doubt of whether a child is at risk, report on the general situation for children, rather than on an individual child.

5.3.3 Child Protection Incident Management

Reporting, Investigation & Ramifications

Having an efficient policy to protect children will contribute towards ensuring the highest possible security standards are provided for the children within our programs. However, no policy can guarantee that abuses will not take place and as such, it is necessary to have a system in place to address issues of reporting, investigation and ramifications of misconduct. In all investigation and action proceedings, distinctions must be made between a potential Code breach and alleged criminal activity in relation to local laws concerning the age of consent and relative to the Crimes (*Children's Act 1998, Juvenile Justice Act 2003*).

Procedure

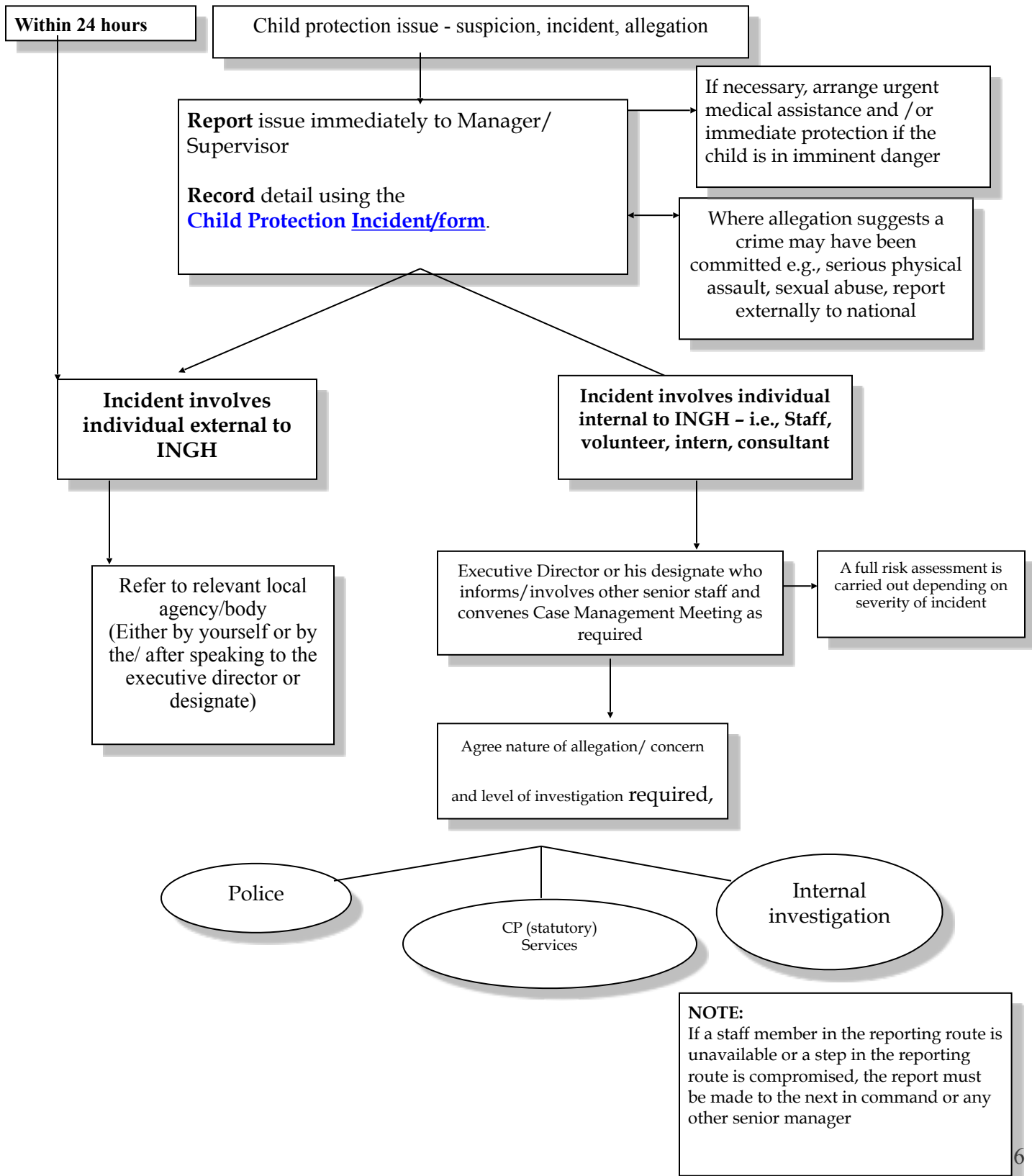
This procedure applies to staff, contractors, volunteers, guests, donors, visitors, agents and partners of INGH both within Ghana and overseas. Where an allegation of abuse or misconduct is made or when alleged abuse/misconduct is observed/suspected

1. Immediately complete a *Child Protection Incident Report*.
2. Provide the report to the Executive Director of INGH. The Executive Director or his/her representative is then responsible for further action.
3. The Executive Director forms a team comprising a Board Member, a head of department and a Program Manager.
4. Ensure the alleged victim's safety continuously. Any person in charge shall intervene instantly to end the alleged abuse. This might include providing/referring to safe shelters, psychological and medical assistance and involving relevant authorities.
5. The team should give consideration to whether the alleged abuser should be removed from the project until such time as the allegation is refuted.

6. The team shall invite suitably qualified person (s) (internal or external) to conduct a preliminary assessment within two days. The assessment should:
 - Find out if a child protection concern is substantiated and whether there is (a) sufficient detail to proceed or, (b) a breach of the Child Protection Code of Conduct or poor practice or (c) possible abuse
 - Determine further action, including a further investigation
 - Ensure that the immediate needs of all concerned are met, including local legal obligations
7. If insufficient details are available for proceeding with an internal investigation, the incident notifier, and any others involved, should be informed of the decision. The investigation should be fully documented and securely filed along with the original Incident Report. INGH shall be cautious not to close down any investigation too quickly.
8. The preliminary assessment may determine that no abuse is suspected, although the person concerned breached the Child Protection Code of Conduct, or some other poor practice has been identified. Management response to the incident may include disciplinary action, removal from the field and possibly dismissal.
9. If possible, abuse is suspected, the Executive Director should formally advise the Board
10. An internal investigation of alleged child abuse should be undertaken to attempt to determine whether the alleged abuse occurred. The investigation should look for external expertise and advice, including legal and psychological advice.
11. INGH may decide or be obliged by local laws to report any suspicions of child abuse immediately to the police/statutory authorities.
12. If external reporting to local authorities does not lead to satisfactory action, INGH may report to superior authorities.
13. If allegations are proven (either through a fair, rigorous and transparent internal and/or external investigation), INGH will enact dismissal proceedings against staff/contractors or severance proceedings against volunteers/guests/donors/visitors.
14. Ensure the victim and his/her family (where necessary) are provided with all available medical care, psychological counselling and on-going recovery/rehabilitation support and assistance.
15. INGH and the relevant local partner should review any lessons learnt and all child protection policy and procedures should be strengthened in an effort to combat further breaches.

Child Protection Incident Procedure Flowchart

INGH's Child Protection (CP) Reporting Process



Child Protection Incident Report Form⁷

Use the child protection incident report form annexed to this document for reporting any alleged child protection related breach, incident or occurrence.

5.3.4 Risk Assessment in Programs and Operations

Operational Risk Assessment

INGH would conduct an organisational and operational risk assessment annually. Improvements and changes to institutional practice would then be made based on the outcome of the assessment. The results of each assessment should be presented to the Board for review and further recommendation (s). The following child protection issues should form part of the risk assessment process for INGH.

- Non-compliance with applicable laws and regulations
- Significant mistakes made regarding sponsorship management
- Sponsored children details are accessed by inappropriate persons
- Child associated with one of our programs is abused by an agent of INGH
- Unauthorised visit by sponsor/supporter
- Quality Assurance checklist would include CP risk assessment and level of compliance to CP policies and procedures.
- Monitoring of child implementation plans would be a key feature of the field visits. A checklist for monitoring the progress towards making INGH a child safe organization shall be used to guide such monitoring visits.
- CP issues/indicators/parameters should be included in all supervision and evaluation checklists

Project Risk Assessment

The identification of risks to children will now form a mandatory component of all project proposals submitted to Donors and any future collaboration with Partner Agencies on related projects.

Partner Child Protection Policies

a. Partner Responsibilities

By abiding by the Code of Conduct and Reporting Procedures, INGH staff, volunteers, donors and representatives can protect themselves against false accusations of inappropriate behaviour towards children or abuse of children. INGH's project partners and all other associates are requested to adopt an equivalent policy.

The partners of INGH have the following responsibilities in relation to child protection:

- Undergo a risk assessment procedure
- Adopt and implement a realistic and consistent Child Protection Policy with local norms and laws including a clause on how the policy is to be reviewed
- Abide by the Child Protection clause, as stipulated in partnership agreements

⁷ See appendix for CP incident reporting form

- Assess the existence and effectiveness of local child welfare, relevant laws and judicial systems, to determine your organisation's legal obligations and whether to work with the local systems
- Raise awareness in the project of its Child Protection Policy, reporting procedures and Code of Conduct
- Ensure that the Child Protection reporting procedures are accessible to all involved with their project, regardless of an individual's gender, age, religion, language, race, literacy level and disability
- Include child protection issues in project proposals
- Include child protection in annual reports
- Review the policy and its implementation regularly
- Apply the incident management procedures of INGH

Partner Guidelines

Partners are encouraged to develop guidelines on:

- Day to day procedures for the protection of children
- Procedures for the recruitment of personnel
- Procedures for reporting and handling of allegations and inappropriate or suspicious behaviour
- Training frameworks for personnel, volunteers and community members involved in projects, together with children who are clients of projects
- Procedures for counselling children who have been victims of abuse
- Procedures for counselling and assisting vulnerable families to ensure their children are not sold into prostitution or labouring contracts.
- Implementation and monitoring of child protection practices

5.3.5 INCAP Operations

Sponsor Visits

- a.** Notification from Global Partners - All requests for sponsor visits shall be received from the Global Partner's Office according to the laid down procedures. To ensure that the necessary background checks according to the child protection policy has been done on the sponsor by the Global partner's office. Specifically, INGH will request that Global partners obtain some police check on the said visitor and provide a copy to INGH prior to the visit.
- b.** Briefing of Sponsor - As a rule, all sponsors would be briefed on the child protection policy by staff and printed copies of the policy would be given to the sponsors prior to the visit. Besides, appropriate and safe communication and correspondence would be highlighted, particularly on the use of the child's image and information on personal websites shall not be allowed. INGH will collaborate with Global Partners to monitor and enforce this rule. The Parent/Guardian of sponsored child and INGH staff shall be present throughout each visit and the sponsored child or siblings shall under no circumstances be taken away from the community. The sponsors are not allowed to stay with the sponsored child. The Sponsor shall not invite the sponsored child to his/her country and INGH shall not take part in arranging such visits.

- c. Sensitizing Sponsor child and family - Upon receipt of notification of visit, INGH staff would go to the sponsor child and family and re-sensitize them on INGHs child protection policy and safety precautions.

Unannounced visits

There shall be a zero tolerance for unannounced visits; INGH staff would not **cooperate with any sponsors that arrive unannounced** at our offices and must ensure they do not visit communities or their sponsor children. Approved visitors arriving at the country with other adults who are not known to the global partners or INGH would not be tolerated.

All requests from Global Partner staff or from sponsors or sponsor's friends for special exceptions to existing procedures for visits should be referred to the Head of Programmes who shall determine with the Global Partner Office the rationale for the request and importance of the visit, before the visit is allowed to take place. This exception does not apply to unannounced visits but visits by Global Partner staff and other guests visiting INGH programmes who have been requested by sponsors to visit their sponsored children whilst in Ghana.

INCAP Communications

- I. Gifts and letters - All sponsor children gifts and letters shall be screened to ensure that there are no inappropriate items or harmful items or wording in the gifts or letters. All gifts must conform to the INGH policy on sponsor children gifts and letters.
- II. Enrollment - It shall be mandatory that consent forms are well explained to the sponsored child and family for them to sign before a child is enrolled.

Photos

Written consent of parents/ guardian and if appropriate sponsored child would be obtained before a picture of a child is taken. The intended purpose of the photo would be explained to the child. Photos for sponsorship should be positive and real while at the same time maintaining the dignity of the child.

Cancellations

It shall be ensured that all cancellation files that need to be destroyed is well managed to ensure that the sponsored children and family information is protected. All the cancellation files that need to be destroyed would be done by INGH staff and within the office premises.

Training & Development

Child protection orientation would be incorporated in any sponsorship related training and workshops.

5.3.6 Administration

Contracts

CP clauses should be included in service contracts for associates, partners, consultants etc. All adverts and Terms of References would have INGH's Child Protection statement

"International Needs Ghana places special emphasis on CHILD PROTECTION issues in all its working relationships and mandates all its working partners to adhere to its Child Protection Policy"

The child protection policy would be attached to all contracts documents and signed by all contractors and consultants. The implications for not complying with the CP Policy would be explained to all contractors and consultants.

If the assignment to be carried out by consultants involves direct contact with children, the staff of the partners who will be directly involved in the project delivery would receive an orientation on INGH's child protection policy and would be monitored closely by INGH staff.

Visibility of CP in INGH

The child protection Policy would be made visible in all INGH offices. Poster version of the policy as well as reporting guidelines would be posted at vantage places in the office.

The simplified CP brochure/leaflet/flyers would be made available at the reception to be given to all visitors, vendors, suppliers etc. A child friendly version would also be produced and distributed widely.

5.3.7 Making CP in Management Responsibilities Operational

- a.* A staff shall be designated to as the Child Protection Focal point person to provide leadership and coordinate CP related activities.
- b.* CP issues should be included in the agenda of key meetings and reports. Management should create the opportunity for open discussions on CP issues during such meetings
- c.* Meetings of children forums and youth groups should have CP issues discussed
- d.* Managers should listen and act on CP reports and concerns raised, the opportunity for informal dialogue on such issues should also be given to staff, children and all partners.
- e.* CP issues/indicators/parameters should be included in all supervision and evaluation checklists. Ensure that all risk factors are identified and addressed in programmes.

- f.* Management would provide support to respond to CP issues.
- g.* Train staff and associates (animators, service providers...) in CP concepts and implementation strategies (mainstreaming)
- h.* Staff PMS evaluation targets should include CP elements
- i.* Assessments would be conducted periodically in all INGH offices/Schools to establish the awareness and compliance status of staff and design appropriate training modules
- j.* CP elements should be included in risk assessment for all potential partners

6.0 Monitoring and Evaluation

These guidelines shall be periodically evaluated internally and externally by any interested Global Partner during field visits. Recommendations shall be addressed directly to the Executive Director.

7.0 Framework Summary

The *INGH Child Protection Framework* consists of an overarching policy document and auxiliary documents, detailed procedures to guide the implementation of the policy and tools to support effective implementation. The following table outlines the various elements of the Framework.

Document	Purpose and Use
<i>Policy on Child Protection</i>	Provides the central policy direction on INGH's stance on child protection.
<i>Child Protection Code of Conduct</i>	Requires the commitment of the individual to child protection. Relevant to INGH employees, contractors and all forms of volunteers. Also relevant to INGH supporters visiting field.
<i>Child Protection Incident Report Form</i>	For use by INGH in the reporting of suspected child protection incidents both in Ghana.
<i>INGH Child Protection Self-Audit</i>	For use by INGH staff to provide annual reports on the strength of child protection implementation to the INGH Board.

<i>INGH Child Protection self-assessment</i>	Conducted once every two years to identify gaps in the implementation of INGH's child protection framework.
<i>Consent Forms (Various)</i>	A tool to be completed by parents and caregivers of children under 18 years who are participating in media related events, or events that requires travelling or residential programmes or any event outside the community of the child.
<i>CP Acknowledgement form</i>	For use by INGH visitors, volunteers, interns, consultants etc. to acknowledge INGH CP policy and commit to respecting CP code of conduct during project visits and possibly having direct contact with children.

Acknowledgements

CBM Guidelines on Child Protection

Child Wise Choose with Care

Child Hope Child Protection Toolkit

AusAID Child Protection Policy

UN Convention on the Rights of the Child

1992 Constitution of the Republic of Ghana

Children's Act of 1998, Act 560, Ghana

APPENDIX 1 – Recruitment Guidelines

A. Job Announcement Statement

INGH is committed to the protection of children and gender equity our recruitment procedures reflect this.

B. Interview Questions Specific on Child Protection

- Tell us of a situation you heard of a suspected case or incident of child abuse in a community,
 - i. How did you deal with it?
 - ii. What lessons did you learn out of it and upon reflection what could you have done differently?

Evidence of ability to apply systematic process to verify child abuse, report for appropriate action, creating awareness etc.

- Can you share with us at least 4 forms of child abuse situations that takes place in rural/urban communities in Ghana on a daily basis and how can they be addressed?

Evidence of knowledge/appreciation and impact on context of sexual/physical/economic exploitation/emotional-verbal abuse/physical neglect/slavery/child trafficking/child labour prevention and management issues/approaches/methodologies.

- Share with us some of the tools you are familiar with and which you have used before to sensitize rural communities about child protection issues

Evidence of use/application of IEC materials, talks, video shows/posters/drama/role plays etc.

- *As a frontline community development worker working with children, what are some of the practical behaviours and attitudes you will have to demonstrate to indicate that you are sensitive to issues of child protection in your base communities?*

Evidence of appreciation of PR risks, legal issues, temptations to abuse positions of trust in communities, and practical steps to demonstrate honesty, transparency/consistency in communications and working approaches.

STANDARD CP STATEMENT IN ALL CONTRACTS WITH EMPLOYEES, CONTRACTORS, CONSULTANTS, VOLUNTEERS ETC

NB: International Needs Ghana places special emphasis on **CHILD PROTECTION** issues in all its working relationships and mandates all its working partners to adhere to its **Child Protection Policy**.

APPENDIX 2 - Child Protection Incident Report Form

This form is to be completed by an appropriately authorised delegate (e.g., Child Protection Focal Person) in the event of an observation or report of an allegation of child abuse or breach of the Child Protection Code of Conduct.

CONFIDENTIAL - THE FOLLOWING WILL BE SHARED ON A 'NEED TO KNOW' BASIS ONLY

Case Reference _____

What is being reported?

Child Abuse

Observed/suspected by yourself (incident of abuse – witnessed/observed actual abuse)

Allegation made by (name).....

Disclosure by child (name).....

Child Protection Concern

Detected by yourself

Received from (name)

Executive Summary

Part 1:

Reporter's Details

Name: _____

Position in International Needs Ghana or relationship with International Needs Ghana:

Address: _____

Phone _____ Email _____

Your relationship with the child: _____

Part 2:
About the child

Name: _____

Gender: ☐ Male ☐ Female

Age: _____ Date of birth _____

Address & contact details: _____

Who does the child live with? _____

Part 3:

Alleged Perpetrators details: (complete as much as possible if known)

Name: _____

Nationality _____

Address/Current Location: _____

Language/s spoken _____ Age: _____ Sex: Male/Female Relationship to victim: _____

Occupation: _____ Employer _____

Any other details (including physical description):

Part 4:

Findings: About the alleged child abuse incident/child protection concern

How were you made aware of the alleged child abuse incident/child protection concern?

Date, time and location of any incident/concern: _____

Details of incident/concern (what happened): _____

Exactly what the alleged victim or person expressing the allegation/concern said and what you said (do not lead, record actual details)

Observations made by you (e.g., Observed injuries, perceived emotional state. Make clear whether fact or opinion):

Current Safety of the child? *(Include any immediate safety concerns such as access of perpetrator to the safety within the family, any emergency needs)*

Does the report or presentation of the child (if present) suggest emergency medical attention is needed?

Has any emergency medical or other support been required? If so, what was provided, when and by whom?

Who else knows? *(e.g., national authorities, other agencies, family members, other individuals)*

Details and statements of any witnesses (including children):

External agencies or people contacted (if any) – date, time, name of person and agency, any advice received:

Part 5:

Action taken and learning

Actions taken to date? (*e.g., referral to the police, social welfare etc.*)

Outcome of investigation and action taken: _____

Lessons learned (strengths and weaknesses of child protection policy and its implementation):

Recommendations (to prevent possible abuse and improve investigation process in future):

List of appendices (Child Protection Incident Report, interview reports, key documents and correspondence): _____

Signature of person completing this form: _____

Date: _____

APPENDIX 3 - Child Protection Policy Compliance Indicators

Compliance standard	Why this is required	Evidenced by
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1. The organisation has a child protection policy that applies to all personnel, partners and subcontractors that are engaged to perform any part of an INGHs work.	- A child protection policy provides clear guidance and demonstrates how the organisation, across its operations, will ensure that children are protected from child exploitation and abuse in the delivery of INGH's interventions or programmes	- Child protection policy. - Personnel are aware of the organisation's child protection policy (e.g., through internal communication and training). - Documented plan for ensuring INGH is working towards meeting the minimum standards
2. The organisation has robust recruitment screening processes for all personnel in contact with children. These recruitment procedures include: - criminal record checks with previous employers and or police before engagement - verbal referee checks - interview plans that incorporate behavioural-based interview questions. These are to be used when candidates are applying for positions that involve working with children.	- Child-safe recruitment and screening processes are essential to enable an organisation to choose the most appropriate person for a position that involves contact with children.	- Documented criminal record checks for personnel in contact with children. - Documented verbal referee checks. - Interview plans incorporating behavioural-based interview questions that are specific to positions that involve working with children. - Documented request for an applicant to disclose whether they have been charged with child exploitation offences and their response.

3. The organisation's child protection policy includes a documented reporting procedure for child exploitation and abuse allegations and policy non-compliance, including available sanctions for breaches.	- An effective child protection policy requires a report handling procedure. One of the biggest hurdles to personnel reporting child exploitation and abuse is that there is no formal system in place to do so, or that personnel are not aware of a formal system to report concerns or allegations. - Reporting systems must respect the rights of the alleged victim and alleged offender.	- Organisation's guidelines for managing concerns or allegations of child exploitation and abuse, and policy non-compliance. - Documentary evidence that personnel can raise concerns about a child's safety or well-being or unacceptable behaviour by personnel. - Documentary evidence outlining the organisation's details of available sanctions for breaches of the code of conduct.
4. The organisation provides child protection training for personnel.	- Personnel must be fully aware of their responsibilities to protect children and how to report concerns or allegations about child exploitation and abuse.	- Training agendas and timeframes for training. - Materials used in training.
5. The organisation has a child protection code of conduct that meets the minimum standard set by INGH (see INGH's Child Protection Code of Conduct).	- A code of conduct protects children and personnel. It makes clear the organisation's standards for acceptable/unacceptable behaviour in relation to children and must be signed by all personnel. - It protects personnel by providing guidance on how to avoid situations that may be perceived as harmful to children. It also provides employers with a sound basis on which to conduct disciplinary action.	- A child protection code of conduct based on INGH's Child Protection Code of Conduct. - Signed codes of conduct or a register documenting details of personnel who have signed the code of conduct.
6. The organisation's child protection policy commits it to preventing a person from working with children if they pose an unacceptable risk to children.	- Provides the organisation with clear grounds as an employer to determine whether a person is the most appropriate to work with children.	- Referenced in relevant documentation, including policies, contracts and human resource guidelines.

7. The organisation's employment contracts contain provisions for dismissal, suspension or transfer to other duties for any employee who breaches the child protection code of conduct.	- Reinforces the importance of the organisation's policy to personnel. - Ensures the organisation has legal recourse to remove or transfer personnel who pose an unacceptable risk to children.	- Contract with personnel.
8. The organisation's child protection policy is subject to regular review – at least every five years or earlier if warranted.	- Contexts change, particularly in the development sector. There must be a commitment to review and update the policy as required. - Given that child protection policies are relatively new for many organisations, it is important that an organisation can learn and adapt from its experiences in implementing its child protection policy.	- Timetable/timeframe for review. - Policy review report at least every five years. - Records of consultation with INGH on policy review.
9. The organisation's child protection risk is subject to regular review – at least every five years or earlier if warranted.	- Some activities are higher risk than others. This may be due to the nature of the activity or the location. For example, working with children with disability or in an emergency situation.	- Risk log/register identifying high risk activities and measures to reduce or remove the risk to children. - Evidence that risk assessments are reviewed/updated throughout the lifecycle of the activities.