

# Child Protection Policy

## Contents

### **Introduction to Laslett International Limited (LIL) Child Protection Policy (CPP) statements**

- 1. Child Protection Policy (CPP) statements**
  - 1.1 LIL commitment to child protection**
  - 1.2 General principles**
  - 1.3 Definition of Abuse**
  - 1.4 Responsibilities**
  - 1.5 Upholding our commitment**
- 2. LIL Practices for Child Protection**
  - 2.1 Recruitment of staff and experts**
  - 2.2 Implementing field projects dealing with children**
  - 2.3 Reporting concerns about safety or welfare of children**
  - 2.4 Training and education**
  - 2.5 Partners**
- 3. Policy management**
  - 3.1 Dissemination and distribution**
  - 3.2 Monitoring**
  - 3.3 Revision and approval**

### **Introduction to LIL Child Protection Policy (CPP) statements**

Laslett International Limited (LIL) is a private management consulting company registered in the UK. LIL recognises that although its HQ practices and processes do not routinely engage with children, some of the projects LIL designs, implements and monitors around the world do. As such, LIL recognises that it has a fundamental duty of care towards the children it comes in contact with through its projects, and acknowledges its responsibility to keep children safe in all its relief and development project interventions.

This Policy has been developed to uphold our commitment to keep children safe, and to provide guidance to our staff and experts on procedural and behavioural on safeguarding children safety. The Policy clarifies roles and responsibilities for all staff and provides further details specifically for staff and experts routinely engaged with working with children, or in substantial occasional contact with children (staff and experts on children-focused projects).

This document is organised in three sections:

1. LIL Child Protection Policy (CPP) statements: where our commitments and beliefs in relation to Child Protection are clearly and unequivocally stated, as a basis for our work and overall direction to all our staff and experts;
2. LIL CPP Practices: where we describe the processes, procedures, abilities and related roles and responsibilities defined to ensure our commitments to the protection of children are met and upheld in our daily work;
3. LIL CPP Management: where the procedures for our policy management (revision, distribution and dissemination, monitoring) are presented.

The Policy and the practices described have been defined in line with the standards recommended by “Standards for Child Protection”, produced by the Keeping Children Safe Coalition.

## **1. Child Protection Policy (CPP) statements**

### **1.1 LIL commitment to child protection**

We affirm our belief in the right of all children to be protected from all forms of abuse, neglect, exploitation and violence, as set out in the UN Convention on the Rights of the Child 1989.

We recognise that all organisations coming into contact with children have a fundamental duty of care towards them, and we acknowledge our responsibilities to keep children safe in both relief and development interventions.

Our commitment and the standards which follow draw upon the principles outlined in international and regional child rights instruments and commitments.

#### Article 19 – United Nations Convention on the Rights of the Child (UNCRC)

Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.

#### UN IASC Task Force on Preventing Sexual Exploitation and Abuse in Humanitarian Crises 2002

Humanitarian agencies have a duty of care to beneficiaries and a responsibility to ensure that beneficiaries are treated with dignity and respect and that certain minimum standards of behaviour are observed. The goal is to create an environment free of sexual exploitation and abuse in humanitarian crises, through integrating the prevention of and response to sexual exploitation and abuse into the protection and assistance functions of all humanitarian workers.

Though the achievement of the standards may often be influenced by factors beyond our control, we commit ourselves to consistently work towards achieving them and we expect to be held to account accordingly.

### **1.2 General principles**

Through this policy and our implementation standards, we adhere to the following principles:

- All children have equal rights to protection from abuse and exploitation;
- All children should be encouraged to fulfil their potential and inequalities should be challenged;

- Everybody has a responsibility to support the care and protection of children;
- LIL have a duty of care to children with whom they work and with whom their representatives work;
- If LIL works with partners, we have a responsibility to ensure our partners meet minimum standards of protection for the children in our programmes (section 2.5)

### 1.3 Definition of Abuse

Abuse is any behaviour towards a person that deliberately or unknowingly causes him harm, endangers life or violates their rights. Abuse may be:

- Physical
- Sexual
- Psychological
- Financial or material (stealing or denying access to money or possessions)
- Neglect
- Discriminatory (attitudes towards race, religion, gender, disability or cultural background)

### 1.4 Responsibilities

All LIL staff and experts are required to adhere to this policy and take shared responsibility for the safeguarding and safety of any young people and vulnerable adults they come into contact with. Specifically:

- The Managing Director has responsibility for the oversight of LIL's Child Protection Policy with delegated responsibility to relevant members of LIL Corporate Management and Project Management Team members for specific projects or programmes;
- The Managing Director is appointed LIL HQ Child Protection Officer (HQ-CPO), and will be in charge of supporting the definition, implementation and revision of the standards presented in the next chapters. The Managing Director might delegate part of the tasks for the role of LIL HQ Child Protection Officer to a Board member, but will maintain ultimate responsibility.

The managerial responsibility for general office activity rests with the individual staff member who is directing or organising the activity. This person is expected to ensure that any activity is planned, organised and delivered in accordance with the Child Protection Policy; and consult with the Child Protection Officer to arrange the checking, training, induction and guidance for all staff and volunteers involved in the planned activity.

### 1.5 Upholding our commitment

To uphold our commitment, LIL has identified "practices", which define and describe the internal process and procedures, and the level of performance and ability, required to keep children safe.

LIL realises that standards need to be applied locally to make them relevant and achievable. As such, LIL used a rigorous but flexible approach, where it identify standards applicable for both HQ staff and field consultants but focuses on standards to be applied specifically for LIL - managed field projects which deal with children.

## 2. LIL Practices for Child Protection

### 2.1 Recruitment of staff and experts

All staff at LIL, regardless of their tasks and level of expected interaction with children, will be informed about this Policy and requested to adhere to it, formally signing it on acceptance of any long term or short-term job.

Freelancers/experts will be required to sign the acceptance if they are recruited for 'child-sensitive posts' (below)

Staff and experts/freelancers recruited for 'child-sensitive posts' are defined as:

- All permanent and temporary staff at HQ level who are expected, in the course of their career with LIL, to be in regular or significant occasional contact with under - 18s or vulnerable adults in the course of their work;
- Experts (short term or long term) contracted by LIL for projects which imply regular or significant occasional contact with children.

To assess whether the project, or the individual post, is 'child-sensitive':

- a) For staff, the Practice Leader of the practice where the staff post is created will consult with the HQ-CPO to decide whether the position has regular or significant occasional contact with children;
- b) For project experts, the Project Director leading the bid will consults the HQ-CPO to decide whether the project and the position involves regular or significant occasional contact with Children.

In both cases, the HQ-CPO can defer decision to the Managing Director.

For staff and experts recruited for 'child-sensitive posts' born and based in the UK, LIL is committed to have satisfactory Criminal Records Bureau (CRB) enhanced checks. Where no CRB enhanced checks can be undertaken, we will:

1. Look at an equivalent body if one exists in the country of recruitment/origin;
2. Include questions about previous experience of the candidate in working with children in the candidate reference check;
3. Ask the staff/expert to sign a sworn statement.

A 'satisfactory' check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post, and positive references. The staff will also be asked to sign a form where s/he confirms she/he has no criminal convictions related to put children at risk. Reference checks will include a specific question to referees about the staff/expert's awareness and commitment to child protection.

All staff still employed to look after or interact with children must report any subsequent criminal convictions to the Head of Personnel/HR Manager. Failure to do so will result in disciplinary action being taken.

### 2.2 Implementing field projects dealing with children

Most of LIL HQ work does not routinely engage with children, but some of LIL projects do. LIL is also aware that its projects are implemented in a variety of settings with great variations in understandings and arrangements for child protection and of what child abuse means. Therefore, rather than providing binding procedures for all contexts, the Team

Leader of each project dealing with children has the responsibility to tailor this policy and its practices to the local contexts.

### **Identifying ‘child-sensitive’ projects**

As per the practice with recruitment, the Project Director leading the bid consults the HQ-CPO to decide whether the project involves regular or significant occasional contact with children. Once it is established that a project is dealing with children, the design and implementation of a project specific policy is included within the project inception activities; the related budget is included in the project budget; and the responsibility of developing and monitoring the localised policy is included in the Team Leader’s (TL) responsibilities. The TL becomes de-facto the project Child Protection Officer (Proj-CPO). She/he can delegate and nominate to the role any full time member of the team, although she/he will maintain ultimate responsibility.

### **Tailoring the policy for ‘child-sensitive’ projects**

As a first step, the Proj-CPO will conduct (either directly or through specialised experts, depending on the complexity of the context and his/her own background) a situational analysis to identify and map the legal, social welfare and child protection arrangements in the context of the project. The analysis will need to also assess whether there are particular categories of children which are particularly discriminated or at risk, which should therefore be particularly protected.

Based on the analysis conducted, the localised policy will be developed. During development and in any case before finalisation, a process of consultation with local experts and ideally with organisations protecting children, and children themselves, should be conducted for validation. Such consultations will also allow resolving potential differences between what is considered acceptable behaviour locally and what is acceptable under the overall LIL Child Protection Policy (based on the UNCRC). Ideally, depending on the context, the localised policy will be translated in all relevant local languages for easy accessibility.

The localised policy will need to contain as a minimum the following elements:

- Statements of commitment (which should be in line with the overall LIL policy)
- A reporting chart/table which identifies the roles and responsibilities within the project for child protection during project implementation, at all levels of the project (e.g. district, national, etc..), including provisions for monitoring compliance with the policy
- Code of conduct / localised guidelines for appropriate adult-to-adult and child-to-child behaviour (including guidance on physical contact. It remains clear that no physical punishment will be accepted)
- Specific recruitment procedures in addition to the ones included in the LIL policy, if it applies
- Provisions for access to advice and support: how can children be informed on where to go for help; which staff members have special responsibility; contacts at national/local level that can provide support to children and staff; which arrangements are in place to provide support to individuals during and following an incident or allegation of abuse or complaint;
- Provisions for regular consultations: which processes should be put in place to consult children and parents/carers about their views on policies and practices for keeping children safe;

- Guidelines on setting up websites, the use of videos and photography of children: For any LIL activity involving young people, parents or guardians must be given the opportunity to refuse permission for photographs, videos or other images to be made of their children and for the children to be interviewed by press, broadcasters or other media.

### **Approving and monitoring the localised policy**

The localised version of the policy, prepared by the Proj-CPO (in consultation with the TL if not the same person) will be discussed with the Project Director and Project Manager at HQ, and finally approved by the HQ-CPO. The Proj-CPO will be responsible for the implementation and monitoring of the localised policy.

#### **2.3 Reporting concerns about safety or welfare of children**

Adults and children have a responsibility to treat one another with dignity, respect, sensitivity and fairness. LIL will not tolerate any behaviour that discriminates, offends or is violent, and sets up a process for dealing with complaints, inclusive of a right of appeal.

Any staff, expert, external stakeholder and beneficiary (adult or child) has the right to file a complaint.

For projects, the first line of complaint is the proj-CPO. The proj-CPO is responsible for a first, confidential assessment of the complaint. She/he is not entitled to disclose any information, nor even to the alleged offender, without the consent of the complainant. Similarly, the complainant needs to be made aware that no action against the alleged offender can be taken without informing and consulting the alleged offender first.

The proj-CPO is responsible to securely store any recording of incidents, concerns and referrals, so that confidential information is locked away, in accordance with local data protection law if available.

The proj-CPO will:

- Receive information from any staff, volunteers, children, or carers who have child safe guarding concerns and record it;
- Assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate and in line with the confidentiality and information guidance;
- Consult initially with a statutory child safeguarding agency to test out any doubts or uncertainty;
- Make a formal referral to a statutory child safeguarding agency or the police if necessary.

While the proj-CPOs can attempt mediation, She/he might, previous obtaining authorisation from the complainant, consult with the HQ-CPO and approach local professional support (either in terms of psychological support or legal/police support).

If the complaint is against the proj-CPOs, the TL (if different from the proj-CPOs) will be in charge of managing the complaint. Otherwise, the case will be referred to the HQ-CPO, who, in consultation with the person submitting the complaint; can allocate one responsible staff to deal with the case in country.

Second line of complaint / first appeal

If the evidence collected points to action needed to be taken, the proj -CPO, previous obtaining authorisation from the complainant, will escalate to the HQ-CPO.

Similarly, if the complainant or the person against whom the complaint is filed are unsatisfied with the decision(s)/action(s) taken at project level, they can escalate to the HQ-CPO.

The HQ-CPO is responsible to securely store any recording of incidents, concerns and referrals, so that confidential information is locked away, in accordance with UK's data protection act.

While the HQ-CPO can attempt mediation, he would also consult with the Board/Senior Management and jointly approach local or UK-based professional support (either in terms of psychological support or legal/police support). Internally, the Board/Senior Management can order the dismissal of the staff/expert.

Final appeal should be addressed to the Board.

#### 2.4 Training and education

An introduction to the child protection policy is provided to all staff that join LIL as part of their induction by the HQ-CPO (this task can be delegated to the staff responsible to conduct the induction).

Budget is set aside to provide in depth training to the HQ-CPO, including on the following topics:

- How to deal with complaints
- Safer recruitment practices
- Best practices on child protection
- Laws and legislation on child protection
- Assessing risks in working with children
- Standards of behaviour toward children

The HQ-CPO will organise a Child Protection yearly training to all staff, to keep staff updated on good practices and aware of changes in policy or legislation.

This is in addition to project-specific training and education which will be defined as part of the localised CPP policy in all 'child-sensitive' projects as described in 2.2. Budget for training and education in those cases will be included within the project budget.

#### 2.5 Partners

When working in partnership with others, at HQ or field/project level, LIL aims to guarantee that children are kept safe by the partner organisations as well.

As such, during the definition of the partnership there is a process of engagement on child protection issues to ensure common agreements, mutual learning and development of good practices. The existence of a child protection policy and procedures form an essential part of

partnership agreements, where LIL and the partners' Child Protection policies will be discussed. Each pre-bid agreement with partners at project level will specify which policy will apply to the consortium.

If the partner does not have a specific Child Protection Policy, and the project involves regular or substantial occasional interaction with children, the partner will be asked to subscribe to LIL policy.

### 3. Policy management

#### 3.1 Dissemination and distribution

Each LIL staff, permanent or temporary, will be given a copy of the policy at hiring, or whenever the policy is updated.

Each LIL staff, permanent or temporary, will be requested to sign his/her adherence to and understanding of the policy. Copy of ant signed forms will be filed by the CPP Officer.

The same applies to all experts contracted by LIL in projects which are dealing with children, as evaluated by the LIL Managing Director in consultation with the CPP Officer and Project Director under which leadership the project is implemented.

#### 3.2 Monitoring

The LIL Managing Director supported by the CPP Officer will regularly monitor compliance of the policy for standards applicable at HQ level.

For projects dealing with children, the Project Manager assigned to the project, in consultation with the Project Director and the Team Leader, will conduct biannual audits to ensure applicable standards are properly implemented. Concerns on compliance or suggestions for policy improvement will be reported to LIL Managing Director and the CPP officer

#### 3.3 Revision and approval

This policy is reviewed every three years as a minimum, or whenever there is a significant change in LIL or if there are any legal changes. LIL Managing Director is tasked with ensuring the revision process is timely, supported by the appointed CPP Officer.

Each new revision is approved by the full LIL Board.

Signed by:



**Robert C. Laslett** CEng FEI FIET HonFAPM FACostE FRSA FIoD

Managing Director

**LASLETT INTERNATIONAL LIMITED**

16<sup>th</sup> February 2018