



## **CHILD AND YOUTH PROTECTION POLICY**

**Version 1 | 2020**

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## **I. INTRODUCTION**

De Nazarin Community Relief (hereafter referred to as ‘DNCR’) is a registered not for profit organization based in Uganda, as an Independent and a private entity, DNCR respects a strict political and religious impartiality, and operates following principles of neutrality, non-discrimination, transparency, according to its core values: responsibility, impact, enterprising-spirit and inspiration.

DNCR is committed to shape practices and influence policies in humanitarian and development settings in order to positively impact lives of people and their communities, DNCR aims to enable better and more effective decision making by generating and promoting knowledge, tools and practices for humanitarian and development stakeholders.

The commitment of DNCR is guided by the following four core values:

### **EMPOWERMENT**

Our approach means that everyone involved with the De Nazarin Community Relief, right from our staff, supporters and the vulnerable people living in poverty should feel that together we can make hope become a reality.

### **GENDER EQUALITY**

We demonstrate and advocate for gender equality, which is not only important for women, it’s good for the community. Women’s equality ensures more peace and a prosperous community for the women, children and men. Inequality in the labor market, communities, organizations and families’ breeds exclusion and may result to violence.

### **INCLUSIVENESS**

Our organization is open to everyone and embraces diversity, at the De Nazarin Community Relief, we believe everyone in the community has a contribution or a part to play, regardless of the invisible and the visible differences.

### **TRANSPARENCY**

Our results focus and purpose driven, approach means we take responsibility for our actions and hold ourselves accountable, De Nazarin Community Relief also believes that others must be held accountable for their actions.

## **A. Policy statement**

DNCR is committed to respecting the highest standards in terms of efficiency, responsibility and transparency in its activities. To this end, DNCR’s Child and Youth Protection Policy:

- Encourages prevention.
- Promotes detection.
- Sets out a clear investigation process.
- Sets out a mechanism of sanctions.

The policy is aimed at guiding DNCR staff and the other entities referred to in Article 1 of this policy, and must be considered together with:

- DNCR’s Code of Conduct;
- DNCR’s Sexual Exploitation and Abuse Policy;
- DNCR’s Data Protection Policy;
- DNCR’s Conflict of Interest Prevention Policy;
- DNCR’s Grievance Policy;
- DNCR’s Anti-Fraud, Bribery and Corruption Policy;
- DNCR’s procedures, manuals and handbooks e.g. Finance, Logistics, Human Resources, Grants Management;
- DNCR’s Security and Safety Guidelines;
- Relief, of which DNCR is a signatory.

The original Child and Youth Protection Policy is in English.

As an NGO operating in Uganda, DNCR recognizes that children and youth within the communities with which DNCR works or comes into contact constitute a particularly vulnerable population group. As such, they are at greater risk of violence, negligence, abuse and exploitation - particularly in disaster and emergency contexts, where their protective environment is severely affected.

DNCR is aware that its programs, particularly in the vulnerable poor communities and in emergency situations, can create an imbalance in the relationship between those employed by or associated with DNCR and direct or indirect beneficiaries of its programs, including assessment interviewees. DNCR recognizes that this power imbalance can be exploited and instrumentalized.

This Child and Youth Protection Policy demonstrates DNCR's commitment to protect both the children and youth within the framework of its internal procedures, and in particular for the implementation of activities involving youth, children and the mainstreaming of this issue in all its interventions.

This policy also clarifies, for all those working for DNCR, what is required in terms of child and youth protection. It also specifies that all violation of children's rights, in whatever form, are unacceptable at DNCR and will be sanctioned.

This policy has been developed so that the best interests of a child and the youth can be systematically taken into account by DNCR and to ensure the integration of the children and the youth protection at the institutional level in order to promote the maximum protection of this vulnerable age against all forms of ill-treatment and negligence.

This policy ensures that DNCR has implemented procedures to prevent and respond to all forms of violence, ill-treatment, negligence, abuse and exploitation regarding children and youth, as well as any violation or non-compliance with this policy or any other related procedures.

This Child and Youth Protection Policy is based on the national laws, relevant international law and international norms, in particular:

- Convention on the Rights of the Child and Youth needs rights and Protection,
- The texts of the Alliance for the Fundamental Standards of Humanitarian Aid,
- The minimum standards for protection during humanitarian action,

DNCR is committed to the well-being of children and the youth activities, focus on the children is based on the principles of the 1989 United Nations Convention on the Rights of the Child and the 1948 United Nations Declaration of Human Rights and the 2013 Office of the Secretary General's Envoy on the Youth, to enhance the UN response to the needs of young people and advocate for the promotion and protection of their needs and rights.

1 These child principles are:

- The best interests of the child.
- Non-discrimination.
- Freedom of expression.
- Respect for children's views on issues of interest to them.
- Child participation.

2 These youth principles are:

- Youth voices and engagements.
- Focus on strength and positive outcomes.
- Strategies that involve all youth.
- Community involvement and collaboration.
- Long - term commitment.

1 General Assembly (10 December 1948), *The Universal Declaration of Human Rights (UDHR)*. <http://www.un.org/en/universal-declaration-human-rights/>

Exploitation and violence against children refers to any physical and/or psychological form of ill-treatment, sexual abuse, negligence, abandonment or negligent treatment, exploitation, including commercial exploitation, the use of children for military purposes, which may result in actual or potential harm to the health, survival, development or dignity of the child and denying of the youth a voice and engagements to their interest as young people, absence of focusing on strength and positive outcomes in the community as the youth and the lack of Long - term commitments practices as activities in the context of a relationship of responsibility, trust or power can be limited

DNCR is committed to take concrete measures to prevent the recruitment or engagement with DNCR of perpetrators of all forms of violence against children and advocating for youth rights including anyone associated with DNCR. All those directly or indirectly involved in the implementation and monitoring of DNCR's programs and actions are bound by its Child and Youth Protection Values, if despite DNCR's precautions, any person working with DNCR violates the provisions of this policy, DNCR will take disciplinary action in accordance with this policy.

#### B. DNCR's child and youth protection principles

In order to reach the above mentioned objectives, DNCR is committed to raise awareness among all DNCR staff, to carry out a prevention policy and, if required, to sanction behavior that contravenes the present policy.

##### 1. Awareness

**(I) Training:** As part of its recruitment, DNCR will ensure that its staff and partners are trained on the Code of Conduct, the Child and Youth Protection Policy and the reporting of all forms of violations. Whenever updates are prepared, sessions are organized to ensure that DNCR staff is aware of any update and best practices regarding child protection and youth.

**(II) Staff directly involved in child-related and youth activities** will receive additional technical and specialized training, and may develop their skills on the subject, including (but not limited to) child protection and youth policy, prevention of and response to violence against children, integration of child protection into programs and advocate for youth rights programs.

##### 2. Prevention

**(I) Recruitment and selection of staff:** DNCR prevents the employment/deployment of inappropriate individuals through rigorous selection processes, (i) face-to-face and video conference interviews - where possible (ii) verification of experiences and references, including - where possible - obtaining additional documents provided by third parties for staff in direct contact with children. Persons who are registered for crimes and offences against children or persons who have been accused or convicted of serious criminal activities, as far as the information is accessible, are not entitled to be in direct contact with children as part of DNCR program. Serious criminal activities include, among others: murder, sexual offences, offences and convictions for aggravated assault and battery, indecent behavior, abduction crimes, crimes related to child prostitution or child pornography.

**(II) Selection of partners and subcontractors:** DNCR does not sign contracts with partners or suppliers who cannot respect strict codes of conduct and professionalism, applying the principle of "knowledge of its supplier" for all national, international and restricted calls for tenders. Suppliers, as far as possible, are required to sign an ethical declaration clearly stating their responsibilities for the protection of children and the youth prior to the finalization and signing of service or supply contracts.

**(III) Strict application of the DNCR's Code of Conduct:** all DNCR staff and those of partner organizations must, within the framework of their contract, strictly apply the Code of Conduct. The Code explicitly prohibits harassment, abuse, sexual abuse and exploitation of children and the youth.

### 3. Action in case of policy violation

Investigation: if behaviors violating the requirements of this policy are reported to DNCR and it's committed to carry out a thorough, impartial and timely investigation in order to fully investigate the allegations.

**(I)** Aware of the importance of a rapid response to allegations concerning child protection and the youth, DNCR is committed to do its utmost to ensure that the reports relating to the present policy can be treated as a priority.

**(II)** If it is confirmed that a person associated with DNCR has committed an act of violence against a child, a criminal act or any act that would violate the youth and children's rights or contravene the principles and norms listed in this document, DNCR will take disciplinary measures as well as any other action adapted to the facts and circumstances.

## II. INTERPRETATION Article 1 – Scope of Application

1. The policy applies to all DNCR staff and governance members.

2. The provision of this policy may also be applied to any person employed by an entity that carries out missions for DNCR.

3. In particular, this policy applies to implementing partners depending on specific clauses and conditions of the grant agreement, suppliers, sub-grantees, beneficiaries (as victims), stakeholders, consultants and other associated entities.

### Article 2 – Definitions

1. Direct contact with children: For the purposes of this policy, being in the physical presence of a child or children in DNCR's work, whether occasionally or regularly, in the short or long term.

2. Child: For the purposes of this document, a "child" is defined as any person under 18 years of age, in accordance with the United Nations Convention on the Rights of the Child.

3. Youth and children III-treatment or negligence: All forms of physical and/or psychological abuse, sexual abuse, negligence or negligent treatment, or commercial or other exploitation, resulting in actual or potential harm to the child or youth's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. Seven subtypes, in particular, are distinguished, in accordance with the definitions adopted, inter alia, by the WHO:

i. Physical abuse: Actual or potential physical harm as a result of an interaction or lack of interaction, that is reasonably within the power of a person in a position of responsibility, power or trust. This may be a single incident or repeated acts.

ii. Sexual abuse: any use of a child or youth's body for sexual purposes for the pleasure of someone older, regardless of the relationship between them, and even without coercion or violence.

iii. Commercial or other exploitation: The use of a child for work or other activity in the interest of others. This includes, but is not limited to, work. These activities are harmful to the child's physical and mental health, education and spiritual, moral or emotional social development (WHO, 1999). Children in the armed forces fall into this category.

iv. Sexual exploitation: The abuse of a position of vulnerability, differential power or trust for sexual purposes; this includes, inter alia, profiting financially, socially or politically from the exploitation of a child or a youth. Prostitution and trafficking for sexual abuse are examples.

v. Emotional maltreatment: Failure to provide appropriate and supportive conditions for development, including a person to whom the child can relate as a priority, allowing the child to develop a range of stable emotional and social skills consistent with his or her personal potential and the context of the society in which he or she lives. It may also include acts that cause or are very likely to cause harm to the child's physical, mental, spiritual, moral or social health or development. Such acts must reasonably be the responsibility of the parent or person exercising a relationship of responsibility, trust or power. These include restriction of movement, denigration, use of the child as a scapegoat or sufferer, threat, intimidation, discrimination, derision or any other non-physical form of hostile treatment or rejection (WHO, 1999).

vi. Negligence and negligent treatment: The caretaker's inattention or failure to ensure the child's development in all areas, including health, education, emotional development, nutrition, shelter and safe living conditions, within the context of reasonably adequate resources. It is also about failing to provide the child with the necessary care and protection from harm to the extent possible (WHO, 1999).

vii. Child labor, this includes full-time work by children under the age of 18 that prevents them from attending school (getting an education), or is hazardous to their health, DNCR advocates and applies for a minimum age of 18 years above.

4. DNCR Staff: Under the terms of this policy, the term “DNCR staff” refers to any person employed by DNCR. The interns and volunteers of DNCR are considered to fall within this category, for the purposes of this policy.

5. Governance: Under the terms of this policy, the term “governance” refers to any person elected by decision making bodies to participate in the managerial and administrative bodies of DNCR.

6. Implementing partners: Under the terms of this policy, an “implementing partner” is a partner to whom the implementation of one or more projects or activities has been delegated, and to whom a budget has been allocated for this purpose. In particular, this refers to international NGOs and/or national NGOs and/or public institutions.

7. Stakeholders: Under the terms of this policy, “stakeholders” are individuals or groups, with or without a legal personality, who directly or indirectly, voluntarily or involuntarily, contribute to, participate in or benefit from, in any way, the actions, programs and activities of DNCR.

8. Associated Entities: Under the terms of this policy, “associated entities” are legal persons under private or public law who play an active role in the implementation of the project but are not responsible for managing any budget.

9. Beneficiaries: Under the terms of this policy, the term “beneficiaries” refers to any person who benefits, directly or indirectly, from DNCR’s programs, including persons of concern such as survey respondents.

10. Sub-grantee: Under the term of this policy, a “sub-grantee” is an individual or a group, with or without legal personality, who receives a budget to carry out a project or activity.

11. Supplier: Under the term of this policy, a “supplier” is a third party, individual or group, with or without legal personality, who directly or indirectly provides any type of goods and/or services to DNCR, whether for a fee or not.

12. Consultant: Under the term of this policy, a “consultant” is a third party, individual or group, with or without legal personality, who directly or indirectly provides any type of consulting services to DNCR, whether for a fee or not.

#### Article 3 – Information and adherence to the Policy

1. This policy is published under the authority of DNCR. DNCR staff, as well as the other entities referred to in Article 1 of this policy, are required to conduct themselves in accordance with this policy and must therefore be aware of and have understood its provisions and any changes. When they are unsure of how to proceed, they should seek the advice of a competent person, notably their line manager.

2. DNCR staff, as well as the other entities referred to in Article 1 of this policy, who are responsible to negotiate the terms of conditions of employment of any DNCR staff, must ensure that staff is aware of and commits to the full respect of this policy.

3. It is the responsibility of DNCR staff with managerial responsibilities, as well as the other entities referred to in Article 1 of this policy, to ensure that staff under their supervision comply with this policy; and to take or propose appropriate disciplinary measures as sanction against any violations of its provisions.

4. This policy shall form part of the working conditions of DNCR staff and the conditions for the performance of the missions of the other entities referred to in Article 1 of this policy from the moment they certify that they have read it.

5. DNCR will review the provisions of this policy at regular intervals.

#### Article 4 – Purpose of the Policy

The purpose of this policy is to:

1. Implement mechanisms of the child and youth protection and ill-treatment or negligence prevention for DNCR staff and other entities referred to in Article 1 of this policy.

2. Specify the rules on the child and youth protection and child ill-treatment or negligence prevention that DNCR staff and the other entities referred to in Article 1 of this policy must observe.

3. Inform third parties of the conduct that they are entitled to expect from DNCR staff and the other entities referred to in Article 1 of this policy.

### **III. GENERAL PRINCIPLES**

#### Article 5 – Neutrality

DNCR staff and the other entities referred to in Article 1 of this policy, must fulfil their duties in a neutral and a political manner, in accordance with the law, legitimate instructions and ethical rules relating to their roles.



#### Article 6 – Impartiality

In the context of their professional roles and/or their missions, DNCR staff and the other entities referred to in Article 1 of this policy, must act in accordance with the law and exercise their discretionary power in an impartial manner, taking into consideration only relevant circumstances.

#### Article 7 – Confidence of stakeholders

DNCR staff and the other entities referred to in Article 1 of this policy, have a duty to conduct themselves at all times in a way that reflects and upholds DNCR's values of integrity, impartiality and efficiency and contribute to strengthen the confidence of all stakeholders.

#### Article 8 – Hierarchical responsibility

DNCR staff report to their immediate line manager and/or the head of their functional department, unless otherwise provided for by law.

#### Article 9 – Confidentiality

Duly considering the stakeholders' potential right to access information, DNCR staff and the other entities referred to in Article 1 of this policy, must process all the information and all the documents acquired during or as part of the exercise of their duties with the necessary confidentiality.

#### Article 10 – Protection of privacy

All the necessary measures must be taken to ensure that the privacy of DNCR staff and of the other entities referred to in Article 1 of this policy, is appropriately respected; as a result, the declarations provided for this policy must remain confidential, unless otherwise provided for by law.

#### Article 11 – Information held

1. Considering the general framework of international law regarding access to information held by private individuals, DNCR staff and the other entities referred to in Article 1 of this policy, should disclose information only in respect to the rules and requirements applicable to DNCR.
2. DNCR staff and the other entities referred to in Article 1 of this policy, must take appropriate measures to guarantee the security and confidentiality of the information for which they are responsible or of which they are aware.
3. DNCR staff and the other entities referred to in Article 1 of this policy, must not seek access to information which would be inappropriate for them to have. DNCR staff, as well as the other entities referred to in Article 1 of this policy, must not make inappropriate use of the information they may obtain in or as part of the exercise of their duties.
4. In the same way, DNCR staff and the other entities referred to in Article 1 of this policy, must not retain professional information that may or should be legitimately circulated, or circulate information they know, or have reasonable grounds to believe, is inaccurate or misleading.

#### Article 12 – Responsibility of line managers

1. DNCR staff in charge of supervising or managing other DNCR staff must do so in accordance with the policies and objectives of DNCR. They are responsible for responding to acts and omissions of staff under their supervision who violate these policies and objectives, and to take due diligence measures expected from a person in their position to prevent such acts or omissions.

1. DNCR staff tasked with supervising or managing other DNCR staff must take the necessary measures to protect the children, youth and prevent staff under their supervision from engaging in acts likely to generate negligence or child ill-treatment. These measures may be: to draw attention to and implement relevant laws and regulations; to ensure adequate training related to the above listed conduct.

#### **IV. CHILD AND YOUTH PROTECTION MECHANISM**

##### Article 13 – Importance of prevention

1. DNCR staff and the other entities referred to in Article 1 of this policy, shall be sensitized to the children's rights. To this end, DNCR ensures that training is provided to DNCR staff on the DNCR's Code of Conduct, this policy and, specifically, about the need to report any form of child ill-treatment, negligence and youth rights violation.

2. DNCR staff who are in direct contact with children and the youth are entitled to receive special training in particular on Child and youth Protection Policy, prevention and response to child ill-treatment or negligence as well as on integration of child protection into programs.

3. DNCR staff, as well as the other entities referred to in Article 1 of this policy shall actively protect the child in particular through attention, prevention and response to all forms of child ill-treatment or negligence as defined in Article 2 of this policy.

##### Article 14 – Prevention and identification mechanisms

13. Although, through its national actions, DNCR is faced with the most diverse cultures and belief systems, DNCR fully upholds principles of freedom of speech and of protection of victims. As such, DNCR has developed mechanisms that can contribute to prevent child ill-treatment or negligence such as:

Signing of the Code of Conduct by the staff in order to clarify unacceptable behavior and in particular child ill-treatment or negligence; Provision of information to DNCR stakeholders on relevant reporting mechanisms (including through the Complaints and Response Mechanism) to ensure that the field teams maintain a respectful dialogue with beneficiaries; Implementation of trainings and awareness sessions in order to train and empower the teams, particularly for staff exposed to working with minors or the vulnerable population;

Identify risk factors on an ongoing basis and in particular throughout the project cycle;

Put in place evaluation procedures for DNCR partners by carrying out due diligence, particularly with regard to their ethical commitments and past behaviors.

2. DNCR staff responsible for recruiting, monitoring or directing others employed by DNCR must be careful to prevent the hiring or deployment of individuals likely to engage in inappropriate behavior when in direct contact with children.

3. DNCR staff shall ensure that no DNCR partner or subcontractor is in direct contact with children if they have already been convicted of, or registered on lists or registers for, offences of child ill-treatment or negligence, as defined in this policy, and regardless of legal qualifications retained by national courts.

4. As soon as DNCR is aware of any person who has been convicted of, or registered on lists or registers, for offences of child ill-treatment or negligence, as defined in this policy and regardless of legal qualifications retained by national courts, DNCR will not place the person in direct contact with children within the framework of DNCR's programs.

5. Any DNCR partner or subcontractor in direct contact with children must certify that they have read and comply with the provisions of this policy.

#### Article 15 – Prohibition of all forms of child ill-treatment or negligence

It is strictly forbidden for DNCR staff and the other entities referred to in Article 1 of this policy, directly or indirectly, voluntarily or involuntarily, to participate, organize or benefit, by any means whatsoever, from any form of child ill-treatment or negligence as defined in Article 2 of this policy.

#### Article 16 – Behavior to be followed in case of child ill-treatment or negligence

1. In the case of DNCR staff who witness child ill-treatment or negligence:

If DNCR staff believe that they are witness to any of the conduct set out in Article 2 of this policy, committed against any individual, they shall have a direct contact with the perpetrator in order to end such behavior, provided that the facts are not too serious to exclude such an approach.

If the inappropriate behavior does not cease or if DNCR staff is unable to address the perpetrator directly, he or she must report the facts in accordance with Article 18 of this policy.

It is advisable to note the day and time as well as details related to the facts and the names of any witnesses.

In any case, the Human Resources must be informed. If appropriate, the line manager and/or the DNCR Executive Director must also be informed of the facts in order to take appropriate measures and to conduct an internal investigation in a timely manner.

2. In the case of a stakeholder who witnesses child ill-treatment or negligence:

If any stakeholder as defined in this policy believes that he or she is a witness or victim of the violation of this policy, he or she shall address the perpetrator directly in order to end such behavior provided that the facts are not too serious to exclude such an approach.

If the inappropriate behavior does not cease or if the stakeholder is unable to address the perpetrator directly, he or she must report the facts in accordance with Article 19 of this policy.

It is advisable to note the day and time as well as details related to the facts and the names of any witnesses. In any case, the Human Resources must be informed. If appropriate, the line manager and/or the DNCR Executive Director must also be informed of the facts in order to take appropriate measures and to conduct an internal investigation in a timely manner.

#### Article 17 – Photographs of children and vulnerable youth

1. Taking and distributing pictures of children and vulnerable youth is not allowed for DNCR staff in the framework of their professional duties.

2. Only persons duly authorized in writing by DNCR's Communication Department can take project photos in connection with DNCR Programs.

3. Authorized persons shall:

Comply with local practices and restrictions related to the reproduction of personal images before photographing or filming a child or disadvantaged youth; obtain the child's express verbal consent and the written consent of the child's parent or guardian before photographing or filming the child as well as obtain the youth's express verbal consent and his or her written consent before photographing or filming. Within this framework, the objective and the use of the produced photographs will have to be explained;

Ensure that photographs, films, videos and other representations present the children or the youth in a dignified and respectful manner and not in a vulnerable or submissive manner. Children and the youth must be dressed and must not pose in a manner that could be considered provocative or sexually suggestive, ensure that images are honest representations of context and reality.

4. In addition, authorized persons shall:

Obtain the express consent of the child and the written consent of the child's parent or guardian, the same applies obtaining the youth's express consent and his or her written consent before the use of any image for publications, advertising, fundraising, advocacy or other purposes, in print or online. The explicit (unwritten) consent of the child's parent or guardian is sufficient if the photos are taken in the private home, the purpose and use of the photographs will be clearly specified to the consenting party, obtain explicit consent from the child, but not necessarily from the child's parent or guardian, for the images and photos with children from behind or at a distance (not identifiable);

Not reveal the identity of the information or divulge information such as to enable children to be identified or located in the image through the name of the photo files, as well as the metadata or descriptions and texts associated with the photos, in the context of the dissemination, sending and publication in all their forms of electro-technical images;

Not publish identifiable photos of children on social networks or any other online media without the formal and written approval of DNCR's Communication Department.

5. The use and publication online and print by DNCR of any photo with a child in the image is made by DNCR's Communication Department or after explicit written approval by DNCR's Communication Department. DNCR's Communication Department will only publish photos with children in the image accompanied by supporting documents as detailed above.

#### Article 18 – Obligation to report for DNCR staff

1. DNCR intends to respond/come up with an answer/bring an appropriate response to any youth rights violation, child ill-treatment or negligence. To contribute towards this, DNCR has designated a focal point via a specific email address [dreliefuganda@gmail.com](mailto:dreliefuganda@gmail.com).

2. DNCR staff who considers to be a witness of child ill-treatment or negligence which may be in violation of or contravenes to the present policy, must report it to their line manager and/or the DNCR Executive Director and in any case through [dreliefuganda@gmail.com](mailto:dreliefuganda@gmail.com) @gmail.com
3. DNCR staff must report to their line manager and/or DNCR Executive Director and/or the Human Resources and in any case through [dreliefuganda@gmail.com](mailto:dreliefuganda@gmail.com) any evidence, allegation or suspicion of child ill-treatment or negligence of which they are aware in or in the course of their duties. The investigation of the reported facts is DNCR's responsibility, in accordance with the provisions of Article 20 of this policy.
4. If reporting to the line manager and/or the DNCR Executive Director is not appropriate, DNCR staff should report the Human Resources and in any case through [dreliefuganda@gmail.com](mailto:dreliefuganda@gmail.com).
5. DNCR must ensure that DNCR staff who reports a case as described above on the basis of reasonable suspicions and in good faith does not suffer from any harm as a result.
7. Cases of misuse of complaint mechanisms may be subject to sanctions.

#### Article 19 – Report to stakeholders

1. DNCR wishes to support people who are witnesses or victims of violations of the present policy. To this end DNCR intends to facilitate stakeholders reporting for any violation of this policy. Thus, any stakeholder, as defined in this policy, who is a witness or victim of the violation of the present policy can report to DNCR.
2. DNCR must ensure that any stakeholder who reports a case as described above on the basis of reasonable suspicions and in good faith does not suffer from any harm as a result.

#### Article 20 – DNCR investigation in case of internal reporting

1. In accordance with Article 18 of the present policy, DNCR staff must inform their line manager and/or DNCR Executive Director and/or the Human Resources and in any case at [denazarincommunityrelief@gmail.com](mailto:denazarincommunityrelief@gmail.com) in case of suspicion of youth, child negligence and abuse.
2. An e-mail response is sent by [denazarincommunityrelief@gmail.com](mailto:denazarincommunityrelief@gmail.com) upon receipt of the complaint. This answer:
  - details the process to be followed in cases of suspected child ill-treatment or negligence and youth rights violation;
  - requests, where appropriate, further clarification and evaluation of the complaint.
3. The management of the complaint is done either at the local level, at the national level, or at DNCR head offices depending on the seriousness of the reported facts. This evaluation is carried out by the Human Resources at DNCR headquarters upon receipt of the complaint on [denazarincommunityrelief@gmail.com](mailto:denazarincommunityrelief@gmail.com)
4. DNCR staff must:
  - Cooperate in any investigation conducted by DNCR;
  - Keep all records of any alleged involvement that may be required for an investigation;
  - Preserve the confidentiality of any allegation.

## Article 21 – DNCR investigation in case of reporting by a stakeholder

1. In accordance with Article 19 of this policy, stakeholders may report through the Complaints and Response Mechanisms any cases of suspected child ill-treatment or negligence.

2. A response via the Complaints and Response Mechanisms will be provided upon receipt of the complaint. This response:

- details the process to be followed in the event of suspicion of child ill-treatment or negligence or youth abuse;
- requests, where appropriate, further clarification and evaluation of the complaint.

3. DNCR staff and other entities referred to in Article 1 of this policy must:

- cooperate in any investigation conducted by DNCR;
- keep all records of suspected involvement in such cases that may be required in case of investigation;
- preserve the confidentiality of all allegations.

## Article 22 – Investigating authority

Human Resources is responsible for the independent oversight of the child and youth protection policy and is responsible for its implementation within DNCR. In particular, Human Resources is in charge of the management of all child ill-treatment or negligence and youth issues within DNCR.

## Article 23 – Sanction for youth - child ill-treatment, negligence or any sort of abuse.

### 1. Disciplinary sanction

The violation of the present policy, which constitutes in particular a violation of DNCR's Code of Conduct, may result in sanctions ranging from warning to termination of the employment contract for serious misconduct, with no notice and no payment of compensation.

### 2. Other sanctions

DNCR reserves the right to use the full range of contractual sanctions, up to the termination of any contractual relationship, in the event of a breach of this policy by any entity referred to in Article 1 of this policy.

### 3. Reporting to competent authorities

DNCR has the right, depending on the seriousness of the facts found, to report to the competent prosecution authorities the facts constituting child ill-treatment or negligence.

## V. IMPLEMENTATION OF THE POLICY

### Article 24 – Implementation date of the policy

This Child and youth Protection Policy comes into effect after approval by DNCR Committee on 15th Nov 2019.

Article 25 – Adherence to the Policy

DNCR staff and the others entities referred to in Article 1 of this policy, certify that they adhere to these principles by signing the DNCR Policy Acceptance Form and/or by signing their employment contract.

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