

Child Safeguarding Procedure

Water For People has developed this Child Safeguarding Procedure (“Procedure”) consistent with the [Water For People Child Safeguarding Policy](#) (“Policy”).

The definitions incorporated into the Policy apply to this Procedure.

Training: All employees will be required to complete general training on the Policy as part of the annual compliance testing and acknowledgment process. Training will include guidance on how to recognize child abuse, sexual exploitation and neglect, and how to safely and appropriately intervene if a child is believed to be at risk or harmed by a visitor and where to report abuse.

Employees working in country programs and employees who work in medium or high-risk areas (as discussed below), will be required to complete more detailed training.

Water For People will retain local counsel in our country of operations outside the US to provide advice and counsel on applicable legal requirements on child safeguarding and shall provide any training to new and current employees on any material variances from this Procedure and Policy.

Reporting Concerns and Child Safeguarding Officers: Water For People has designated the Director of Risk Management (DRM), Chief Administrative Finance Officer (CFAO), and members of the Talent Team as Child Safeguarding Officers (“CSOs”). CSOs are the first point of contact for reporting and referring concerns about child abuse, sexual exploitation, and neglect. CSOs may also be a resource for individuals to share concerns and discuss appropriate actions. Employees may also report any concerns directly to Water For People’s hotline: www.waterforpeople.ethicspoint.com

Signs will be posted in each Water For People office on Child Safeguarding that include how to recognize child abuse, sexual exploitation and neglect, and how to report concerns. Signage should be in the local language of the community and should be in language that enables children who can read to understand. Vendors, visitors, volunteers, community members, and children are all able to report concerns via the [Ethics Point hotline](#).

When a concern is raised to a CSO, through the hotline or to other Water For People employees, the CFAO must be immediately notified. The CFAO will conduct an objective and robust investigation of the concern in a confidential manner. The CFAO will provide a report to the Global Leadership Team, which will include whether the concern was substantiated, and if so, recommended actions that need to be taken. If a child is at risk, the CFAO shall take action within 24-48 hours to protect the child.

The CFAO shall notify any USAID Chief of Party of the allegations and they shall collaborate to promptly notify USAID to M/MPBP/RSC at disclosures@usaid.gov. with a copy to the USAID AO and the OIG.

The Policy and the Code of Conduct prohibit retaliation against those who make good faith reports of suspected abuse, even if the allegations prove unfounded.

Project Design: In coordination with Country Programs, the DRM will conduct an initial child safeguarding risk assessment for existing country programs and when we have new country programs and thereafter every three years that identifies the ways in which employees and partners come into direct or indirect contact with children for a specific program, project, or activity. Examples of possible higher risk activities are involvement in schools and construction where children are employed by subcontractors. The DRM will develop a standard scoring system used for all country programs to identify medium- or high-risk activities and potential risk mitigation measures that will protect children in advance from child abuse, exploitation, and neglect.

For any program, project or activity which present a medium or high-risk of harm to children, Water For People country directors will incorporate and implement reasonable risk mitigation measures into the design and operation thereof including, but not limited to:

- Limiting unsupervised interactions with children,
- Requiring all personnel to make certain that a child is not alone with one adult in any setting,
- Prohibiting personnel from providing transportation (car rides) to individual children for any reason.
- Developing guidance on expected and acceptable behavior for children and adolescents (who are beneficiaries within the program) towards each other, especially in activities involving direct contact among children,
- Taking into account children's age, gender and disabilities (consistent with USAID mandatory standard provision on Disability) in establishing appropriate safeguards.

IT Actions: The Water For People IT department will have processes in place to audit and spot check IT systems for Child Sexual Abuse Material (CSAM) consistent with the requirements of the Policy.

Code and Policies: Water For People has a Consent to Use Image, Likeness and Personal Information Policy. The Code of Conduct prohibits creation, viewing, and any possession of CSAM at work or using Water For People assets. Therefore, violation of the Code of Conduct delineates the disciplinary consequences for prohibited CSAM conduct.

Media Best Practices: The Consent to Use Image, Likeness and Personal Information Policy addresses Water For People's requirements regarding the acquisition of images, stories, and/or videos of community members and provides the following:

- Ensure images, interviews, and videos of children are only taken after understanding their potential impact on their safety, dignity, and well-being, and in a manner that ensures respect for children's privacy and in compliance with applicable laws.
- Before obtaining and using identifiable images and stories of children, get informed consent from their parents/guardians in writing, and inform the family of how such images or the story will be used.
- Obscure the visual identity of any child if dissemination of the image could make the child vulnerable to stigma, discrimination, abuse, violence, or exploitation.

- Consider how stories and images can convey dignity and respect before sharing them; avoid sensationalism and stereotypes. Consider how the Water For People's words and images reflect upon the children, families, and communities.
- Prohibit the exchange of contact information directly with children. Primary caregivers should mediate all contact.
- Limit sharing of information on social media or otherwise that could expose or endanger children and families. De-identify by changing names, removing geotagging, and changing any personal details where necessary.
- Have only de-identified images (as set for above) available on public sites, store original content and data (names, photos, case studies) securely, and restrict access to those with a need to know.

Recruiting: Water For People requires all new hires to have a criminal background screening where permissible by local law, and the Water For People Talent or HR professionals are required to ensure they occur prior to hire.

In recruiting employees in our Country Programs and those who have direct contact with children as part of their job responsibilities (i) the posted position description will reference our commitment to child safety and the Policy, and (ii) as part of the process for finalists for a position, the applicable Talent or HR professionals are responsible for ensuring that Water For People will also discuss our Policy and inquire about the candidate's previous history and suitability for working directly with children.

Visitors and Volunteers: All visitors and volunteers who will be visiting program or activities evaluated as medium- or high-risk will be required to acknowledge a summary of the Policy. Water For People will designate a visit lead who will accompany and be responsible for ensuring that all visitors are appropriately supervised if contact with children is necessary, and that visitor behavior complies with the Policy and Procedure.