

CHILD PROTECTION POLICY



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I. INTRODUCTION

New Empowerment Initiative-Sierra Leone (NEI-SL) is an independent, youth-led, non-profit, Non-Governmental Organisation based in Sierra Leone, focused on rural community development. NEI-SL is non-sectarian and politically and religiously impartial, and it does not discriminate on the basis of tribe, race, sex, nationality, religion, social status, financial capacity, political belief, or educational background. NEI-SL's work is guided by the principles of Peace and Tolerance; Participation and Inclusion; Transparency and Accountability; Non-violence and Non-Selective Justice; Equity and Fairness; Sharing and Openness; and Diversity and a Non-Xenophobic Resource Management System. These principles shape how we design programmes, allocate resources, and engage with communities and partners.

Driven by a clear mission to improve individual lives and strengthen community resilience across Sierra Leone and beyond, NEI-SL seeks to influence practice and policy in humanitarian and development settings. We produce and promote practical knowledge, tools, and evidence-based approaches to enable more effective decision-making among humanitarian and development stakeholders. By prioritising inclusive participation, impartial resource management, and measurable outcomes, NEI-SL aims to ensure that programmes deliver sustainable benefits for the people and communities we serve.

The commitment of NEI-SL is guided by four core values:

1. Peace and Tolerance

Peace means actively promoting stability, safety, and non-hostile relations in all our work. Tolerance means respecting different beliefs, cultures, and opinions and creating spaces where disagreements are managed constructively. Together this principle commits NEI-SL to prevent conflict, reduce tensions, and foster respectful dialogue in communities and partnerships.

2. Participation and Inclusion

Participation means ensuring people affected by our programmes have meaningful opportunities to shape decisions that affect them. Inclusion means removing barriers so that women, youth, persons with disabilities, minorities, and other marginalized groups can engage equally. This principle guides NEI-SL to design processes that listen, empower, and reflect the voices of all stakeholders.

3. Transparency and Accountability

Transparency means sharing clear, timely information about decisions, resources, and outcomes. Accountability means taking responsibility for actions, answering to communities, donors, and partners, and learning from feedback. Together they ensure NEI-SL operates openly, reports honestly, and corrects course when needed.

4. Non-violence and Non-Selective Justice

Non-violence commits NEI-SL to reject and prevent physical, structural, or verbal harm in all activities. Non-selective justice means applying rules, protections, and remedies impartially—without favoritism or discrimination. This principle ensures our interventions protect people's safety and uphold equal treatment under the law and practice.

5. Equity and Fairness

Equity focuses on allocating resources and opportunities according to need so that disadvantaged groups can reach comparable outcomes. Fairness means decisions and processes are impartial, consistent, and just. NEI-SL uses this principle to prioritize those most vulnerable and to design programmes that reduce, rather than reinforce, inequality.

6. Sharing and Openness

Sharing means exchanging knowledge, resources, and best practices with partners and communities to multiply positive impact. Openness means being receptive to new ideas, constructive critique, and collaborative solutions. This value drives NEI-SL to build partnerships, disseminate learning, and scale what works.

7. Diversity and Non-Xenophobic Resource Management System

Diversity recognizes the value of different backgrounds, skills, and perspectives in strengthening programmes and decision-making. Non-xenophobic resource management commits NEI-SL to allocate funds, goods, and services without prejudice toward nationality, ethnicity, or origin, and to manage resources in ways that respect cultural differences. This principle ensures inclusive, merit-based resource decisions that reinforce social cohesion.

A. Policy statement

NEI-SL is committed to respecting the highest standards in terms of efficiency, responsibility and transparency in its activities. To this end, NEI-SL's Child Protection Policy:

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

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

- NEI-SL's Code of Conduct;
- NEI-SL's Grievance Policy;
- NEI-SL's Child Protection Policy;
- NEI-SL's Conflict of Interest Prevention Policy;
- NEI-SL's Anti-Fraud, Bribery & Corruption Policy;
- NEI-SL's Policy Against Sexual Exploitation and Abuse;
- NEI-SL's Data Protection Policy;
- NEI-SL's Anti-Terrorism and Anti-money laundering Policy;
- NEI-SL's Environmental Safeguarding Policy;
- NEI-SL's procedures, manuals and handbooks;
- NEI-SL's Code of Conduct
- U.N. Inter-Agency Standing Committee (IASC) Six core principles relating to Sexual Exploitation and Abuse.

As an NGO operating in Sierra Leone, NEI-SL recognizes that children within the communities with which NEI-SL 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.

NEI-SL is aware that its programs, particularly in emergency and disaster situations, can create an imbalance in the relationship between those employed by or associated with NEI-SL and direct or indirect beneficiaries of its programs. NEI-SL recognizes that this power imbalance can be exploited and instrumentalized.

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

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

This policy has been developed so that the best interests of the child can be systematically considered by NEI-SL and to ensure the integration of child protection at the institutional level in order to promote the maximum protection of children against all forms of ill-treatment and negligence.

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

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

- Convention on the Rights of the Child,
- NEI-SL's Code of Conduct
- The texts of the Alliance for the Fundamental Standards of Humanitarian Aid,
- The minimum standards for protection during humanitarian action,
- The standard of accompaniment to the Humanitarian Charter and the minimum standards of humanitarian intervention of any nonprofit project.

NEI-SL is committed to the well-being of children. Activities focused on children are 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.¹ These principles are:

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

Exploitation and violence against children refer 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, in the context of a relationship of responsibility, trust or power.

NEI-SL is committed to take concrete measures to prevent the recruitment or engagement with NEI-SL of perpetrators of all forms of violence against children, including anyone associated with NEI-SL. All those directly or indirectly involved in the implementation and monitoring of NEI-SL's programs and actions are bound by its Child Protection values.

If, despite NEI-SL's precautions, any person working with NEI-SL violates the provisions of this policy, NEI-SL will take disciplinary action in accordance with this policy.

B. NEI-SL's child protection principles

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

1. Awareness

- **Training:** As part of its recruitment, NEI-SL will ensure that its staff and partners are trained on the Code of Conduct, the Child Protection Policy and the reporting of all forms of violations. Whenever updates are prepared, sessions are organized to ensure that NEI-SL staff is aware of any update and best practices regarding child protection.
- Staff directly involved in child-related activities will receive additional technical and specialized training, and may develop their skills on the subject, including (but not limited to) child protection policy, prevention of and response to violence against children, and integration of child protection into programs.

2. Prevention

- **Recruitment and selection of staff:** NEI-SL prevents the employment/deployment of inappropriate individuals through rigorous selection processes,
 - (i) face-to-face and videoconference 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 an NEI-SL program. Serious criminal activities include, among others: murder, sexual offences, offences and convictions for aggravated assault and battery, indecent behaviour, abduction crimes, crimes related to child prostitution or child pornography.
- **Selection of partners and subcontractors:** NEI-SL 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 prior to the finalization and signing of service or supply contracts.
- **Strict application of NEI-SL's Code of Conduct:** all NEI-SL 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.

3. Action in case of policy violation

- **Investigation:** if behaviours violating the requirements of this policy are reported to NEI-SL, NEI-SL is committed to carry out a thorough, impartial and timely investigation in order to fully investigate the allegations.
- Aware of the importance of a rapid response to allegations concerning child protection, NEI-SL is committed to do its utmost to ensure that the reports relating to the present policy can be treated as a priority.
- If it is confirmed that a person associated with NEI-SL has committed an act of violence against a child, a criminal act or any act that would violate children's rights or contravene the principles and norms listed in this document, NEI-SL will take disciplinary measures as well as any other action adapted to the facts and circumstances.

II. INTERPRETATION AND APPLICATION

Article 1 –Scope of Application

1. The policy applies to all NEI-SL 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 NEI-SL.
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 NEI-SL'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. **Ill-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'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 World Health Organization (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's body for sexual purposes for the pleasure of someone older than the child, 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. Prostitution and child 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 labour:** Child labour includes full-time work by children under the age of 15 that prevents them from attending school (getting an education), or is hazardous to their health (International Labour Organization, Convention 138). Part-time child labour is permitted from the age of 15, except for activities that could in any way impede the child's access to education or development. NEI-SL applies a minimum age of 18 years.

4. **NEI-SL Staff:** Under the terms of this policy, the term "NEI-SL staff" refers to any person employed by NEI-SL. The interns and volunteers of NEI-SL 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 Member elected by decision making bodies to participate in NEI-SL's managerial and administrative governance bodies. In particular, NEI-SL's Committee Administrators are Governance members.

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 NEI-SL.

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 NEI-SL's programs.

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 NEI-SL, 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 NEI-SL, whether for a fee or not.

Article 3 – Information and adherence to the Policy

1. This policy is published under the authority of NEI-SL. NEI-SL 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. NEI-SL 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 NEI-SL staff, must ensure that staff is aware of and commits to the full respect of this policy.
3. It is the responsibility of NEI-SL 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 NEI-SL 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. NEI-SL 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 child protection and child ill-treatment or negligence prevention for NEI-SL staff and other entities referred to in Article 1 of this policy.
2. Specify the rules on child protection and child ill-treatment or negligence prevention that NEI-SL 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 NEI-SL staff and the other entities referred to in Article 1 of this policy.

III. GENERAL PRINCIPLES

Article 5 – Neutrality

NEI-SL staff and the other entities referred to in Article 1 of this policy, must fulfil their duties in a neutral and apolitical 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, NEI-SL 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

NEI-SL 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 NEI-SL's values of integrity, impartiality and efficiency and contributes to strengthen the confidence of all stakeholders.

Article 8 – Hierarchical responsibility

NEI-SL 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, NEI-SL 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 NEI-SL 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, NEI-SL 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 NEI-SL.
2. NEI-SL 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. NEI-SL 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. NEI-SL 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, NEI-SL 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 offline managers

1. NEI-SL staff in charge of supervising or managing other NEI-SL staff must do so in accordance with the policies and objectives of NEI-SL. 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.

2. NEI-SL staff tasked with supervising or managing other NEI-SL staff must take the necessary measures to protect children and prevent staff under their supervision from engaging in acts likely to generate child ill-treatment or negligence. These measures may be: to draw attention to and implement relevant laws and regulations; to ensure adequate training related to child ill-treatment or negligence; and to set an example of integrity through their personal conduct.

IV. CHILD PROTECTION MECHANISMS

Article 13 – Importance of prevention

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

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

3. NEI-SL 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

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

- Signing of the Code of Conduct by NEI-SL staff in order to clarify unacceptable behaviour and in particular child ill-treatment or negligence; Provision of information to NEI-SL stakeholders on relevant reporting mechanisms (including through the Complaints and Response Mechanism-CRM) to ensure that NEI-SL teams maintain a respectful dialogue with beneficiaries; Implementation of trainings and awareness sessions in order to train and empower NEI-SL teams, particularly for staff exposed to working with minors or the most vulnerable population;
- Identify risk factors on an ongoing basis and in particular throughout the project cycle;
- Put in place evaluation procedures for NEI-SL partners by carrying out due diligence, particularly with regard to their ethical commitments and past behaviours.

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

3. NEI-SL staff shall ensure that no NEI-SL 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 NEI-SL 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, NEI-SL will not place the person in direct contact with children within the framework of NEI-SL's programs.

5. Any NEI-SL 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 NEI-SL 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 – Behaviour to be followed in case of child ill-treatment or negligence

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

- If NEI-SL 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 behaviour, provided that the facts are not too serious to exclude such an approach.
- If the inappropriate behaviour does not cease or if NEI-SL 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 HQ Head of Human Resources must be informed. If appropriate, the line manager and/or the NEI-SL Executive Director / Representative 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 behaviour provided that the facts are not too serious to exclude such an approach.
- If the inappropriate behaviour 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 HQ Head of Human Resources must be informed. If appropriate, the line manager and/or the NEI-SL Executive Director / Representative 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

1. Taking and distributing pictures of children is not allowed for NEI-SL staff in the framework of their professional duties.

2. Only persons duly authorised in writing by NEI-SL's HQ Communication Unit can take photos of children in connection with NEI-SL Programmes.

3. Authorised persons shall:

- Comply with local practices and restrictions related to the reproduction of personal images before photographing or filming a child;
- Obtain the child's express verbal consent and the written consent of the child's parent or guardian before photographing or filming the child. 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 children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children 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, authorised persons shall:

- Obtain the express consent of the child and the written consent of the child's parent or guardian before using an 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 NEI-SL's HQ Communication Unit.

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

Article 18 –Obligation to report for NEI-SL staff

1. NEI-SL intends to respond/come up with an answer/bring an appropriate response to any child ill-treatment or negligence. To contribute towards this, NEI-SL has designated a focal point via a specific email address grievance@newempowermentinitiative-sl.org

2. NEI-SL staff who consider 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 NEI-SL Executive Director/ Representative and in any case through grievance@newempowermentinitiative-sl.org

3. NEI-SL staff must report to their line manager and/or NEI-SL Executive Director / Representative and/or the HQ Head of Human Resources and in any case through grievance@newempowermentinitiative-sl.org 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 NEI-SL's responsibility, in accordance with the provisions of Article 20 of this policy.

4. If reporting to the line manager and/or the NEI-SL Executive Director / Representative is not appropriate, NEI-SL staff should report to the HQ Head of Human Resources and in any case through grievance@newempowermentinitiative-sl.org

5. NEI-SL staff may use the Security Incident Reporting (SIR) format³ and/or the grievance form to report.

6. NEI-SL must ensure that NEI-SL 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. NEI-SL wants to support people who are witnesses or victims of violations of the present policy. To this end NEI-SL 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 NEI-SL.

2. NEI-SL 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 – NEI-SL investigation in case of internal reporting

1. In accordance with Article 18 of the present policy, NEI-SL staff must inform their line manager and/or NEI-SL Executive Director/Representative and/or the HQ Head of Human Resources and in any case at grievance@newempowermentinitiative-sl.org in case of suspicion of child ill-treatment or negligence.

2. An e-mail response is sent by grievance@newempowermentinitiative-sl.org upon receipt of the complaint. This answer:

- details the process to be followed in cases of suspected child ill-treatment or negligence;
- 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 NEI-SL headquarters depending on the seriousness of the reported facts. This evaluation is carried out by NEI-SL headquarters upon receipt of the complaint on grievance@newempowermentinitiative-sl.org

4. NEI-SL staff must:

- Cooperate in any investigation conducted by NEI-SL;
- Keep all records of any alleged involvement that may be required for an investigation;
- Preserve the confidentiality of any allegation.

Article 21 – NEI-SL 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;
- requests, where appropriate, to provide further clarification and elevation of the complaint.

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

- cooperate in any investigation conducted by NEI-SL;
- 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

The Investigation team appointed by the Executive Director is in charge of investigating all child ill-treatment or negligence issues within NEI-SL.

Article 23 – Sanction for child ill-treatment or negligence

1. Disciplinary sanction

The violation of the present policy, which constitutes in particular a violation of NEI-SL'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

NEI-SL 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

NEI-SL 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 of the policy

The HQ Human Resources Department is responsible for the independent oversight of child protection policy and is responsible for its implementation within NEI-SL.

This Child Protection Policy comes into effect after approval by NEI-SL Committee on 1st October, 2022.

Article 25 – Adherence to the Policy

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