



Integrity & PSEAH Policy

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Annexes¹

- Annex 1: Help a Child Code of Conduct
- Annex 2: Child safeguarding Policy
- Annex 3: Anti-Fraud & Corruption Policy
- Annex 4: Integrity Reporting Procedure
- Annex 5: Whistleblowing and misconduct reporting procedure
- Annex 6: Confidential Counseling

¹ The listed annexes are separate files (saved online and on SharePoint). This Integrity Policy also includes a reference to the HR Policy and Employee Handbook, which are separate policy documents.



1. Definitions

Child – a child is any person under 18 years

Child abuse – Child maltreatment is the abuse and neglect that occurs to children under 18 years of age. It includes all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results 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. (WHO)

Child labor – is defined as “work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Exploitative labor and child labor are considered safeguarding violations.

It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and
- interferes with their schooling by:
 - depriving them of the opportunity to attend school;
 - obliging them to leave school prematurely; or
 - requiring them to attempt to combine school attendance with excessively long and heavy work.

In its most extreme forms, child labor involves children being enslaved, separated from their families, exposed to serious hazards and illnesses and/or left to fend for themselves on the streets of large cities – often at a very early age.²

Child protection – Preventing and responding to all violence, exploitation and abuse against children. (KCS)

Child safeguarding – The responsibility of all organisations to make sure their staff, programmes, partners and operations do no harm to children. (KCS)

Child sexual abuse – The involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violate the laws or social taboos of society. Child sexual abuse is evidenced by this activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust

² <http://www.ilo.org/ippec/facts/lang--en/index.htm>

or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to:

- The inducement or coercion of a child to engage in any unlawful sexual activity.
- The exploitative use of child in prostitution or other unlawful sexual practices.
- The exploitative use of children in pornographic performances and materials.³

Child sexual exploitation – A form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, which may involve befriending children, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual.

Child sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple abusers.

Child trafficking – is the recruitment, transportation, transfer, harboring or receipt of children for the purpose of exploitation. It is a violation of their rights, their well-being and denies them the opportunity to reach their full potential.⁴

Commercial exploitation – Exploiting a child or adult in work or other activities for the benefit of others and to the detriment of the person's physical or mental health, education, moral or social-emotional development.

Code of Conduct – A code of conduct set out acceptable and unacceptable behaviour at the workplace, in the communities we work and around children, and the sanctions for failing to comply. All staff, associates and volunteers should sign the code of conduct and receive training on it.

Emotional abuse – Persistent emotional maltreatment that impacts on a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.

³ WHO, 1999

⁴ Protocol to prevent, suppress, and punish trafficking in persons, especially women and children
<http://www.unodc.org/unodc/en/treaties/CTOC/index.html#Fulltext>

Neglect and negligent treatment - Allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in serious impairment of a child's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children from harm and provide for nutrition, shelter and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill treatment of a disabled child.

Physical abuse - Actual or potential physical harm perpetrated by another person, adult or child. It may involve hitting, shaking, poisoning, drowning and burning. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

PSEAH - Prevention of Sexual Exploitation, Abuse and Harassment policy is the set of actions an organization should undertake to protect staff, beneficiaries and members of the community from harm perpetrated by their staff, volunteers, or others operating on behalf of the organization.

Safeguarding violation - is a conduct by a party's employees, personnel or subcontractors that actually or likely causes significant harm to a person, including any kind of physical, emotional or sexual abuse, neglect or exploitation.

Sexual abuse - Sexual abuse refers to actual or threatened physical harm of a sexual nature, which may be inflicted by force, or in situations of inequality, or under coercive conditions.

Sexual exploitation - Sexual exploitation refers to any actual or attempted abuse of a position of vulnerability, power differential, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another person.

2. Purpose and Scope

Help a Child provides a future for children in need, their family, and their entire community. As a Christian non-profit organization Help a Child wants every child – regardless of their social, political, religious, ethnic, or economic background – to have a life in dignity, with love and with a promising future.

This policy document sets the basis for the organization's position on how it acknowledges and should manage any integrity-related risk with the aim to prevent integrity issues from happening, and when occurring, to take adequate action. This includes all acts concerning Sexual Exploitation, Abuse and Harassment. The Integrity & PSEAH policy with its annexes aims to provide clear guidance on what we expect of each other. It describes acceptable standards of behavior and promotes good practice for everyone representing Help a Child.

The policy is in line with the integrity standards of the Dutch network Partos, Goede Doelen Nederland and the Dutch Relief Alliance; and aligns with the Core Humanitarian Standards and the ICRC code of conduct. Help a Child participates in the [Inter-Agency Misconduct Disclosure Scheme](#) and is a full member of the [CHS Alliance](#) as well as the [Keeping Children Safe Alliance](#).

We expect **everyone who represents Help a Child** to comply with international law and to uphold the highest standards of integrity. Everyone is personally and collectively responsible for upholding and promoting these standards of ethical and professional conduct. Each of us, in all aspects of our work, is an ambassador of Help a Child and will frequently work in positions of authority and trust. Help a Child expects its representatives to always behave in a manner that represents Help a Child's mission and beliefs and core values. If only one of us acts in a way that is inconsistent with our values and principles, the impact on our reputation may mean we fail to achieve our objectives.

We expect everyone who represents Help a Child, collectively referred to as staff or employees, to adhere to this Integrity & PSEAH policy, including its annexes:

- Contracted staff
- Consultants
- Volunteers, trainees, and interns
- (Sub)-contractors
- Or anyone else who acts on behalf of Help a Child

This policy forms part of all contracts of employment or conditions of service and all representatives of Help a Child are expected to sign the Integrity & PSEAH policy before conducting any activities on behalf of Help a Child.



3. Meaning of Integrity

3.1 Integrity in general

Based on our organizational core values Help a Child expects its employees to behave with integrity; meaning to Do No Harm and to carefully consider the rights and interests of others. Working with Help a Child should occur within an atmosphere of mutual trust and commitment. It means a safe environment, in which everyone behaves responsibly and is willing to account for their conduct. Nobody should be or feel excluded or treated differently. Inclusiveness is general. It also means handling confidential and privacy-sensitive information with discretion.

Working with Help a Child implies an obligation to the organization, its donors as well as its target groups. Decisions should be carefully prepared, considering the interests and vulnerabilities of all these parties. Employees must use power, resources and information in a responsible manner and must be guided by what serves the public interest, and most of all the dignity and protection of human beings. They must be able to resist temptations and to avoid risky situations. They should carefully consider legitimate rights, interests, and expectations, including in situations where it is not (immediately) clear what is the right choice.

Acting with integrity takes place in day-to-day practice and is not bound to a person's workplace and contracted hours. In our digital world with its flexible methods of working, the separation between work and private life has become less clear. It is therefore important for employees to be aware that private behavior can have a negative impact on their acting as a good employee and may harm their employer.

However, not only the employee has an obligation, but also the organization is expected to be a 'good employer' and has a 'duty of care'. The employer will respect the employees' rights, and not abuse its position of authority. Help a Child aims to ensure good working conditions and a safe working environment. Help a Child is responsible for creating a safe environment in which integrity issues can be discussed and promote awareness of what is meant by acting with integrity. Also, Help a Child highly values respect for people and their private lives, the absence of discrimination (for example, but not limited to, discrimination on the basis of ethnicity, religion, gender identity, age, sexual orientation, and culture) and the protection of health and safety.

Regarding the people Help a Child supports, the organization aims to provide them with high quality support and to refrain from harmful interventions and communications when preparing, facilitating, implementing, monitoring, and evaluating, learning, and phasing out its programs. It complies with international law and respects cultures and traditions as well as the country's sovereignty. When it comes to other stakeholders, such as partner organizations and donors, Help a Child aims to be compliant to all regulations by implementing good governance practices as well as reliable and relevant communications and data.



3.2 Do No Harm

It is one of Help a Child's highest priorities to protect our beneficiaries from harm. Therefore, all representatives of Help a Child are expected to adhere to the protection principles as mentioned in the [Sphere Handbook](#) and derived from the Humanitarian Charter, although they also apply to a development context.

Protection principles:

1. Avoid exposing people to further harm as a result of your actions.

Meaning: those involved in humanitarian response take steps to avoid or minimize any adverse effects of their intervention, in particular the risk of exposing people to increased danger or abuse of their rights.

2. Ensure people's access to impartial assistance – in proportion to need and without discrimination.

Meaning: people can access humanitarian assistance according to need and without discrimination against or preferential treatment of any groups. Assistance is not withheld from people in need, and access for humanitarian agencies is provided as necessary to meet the Sphere standards.

3. Protect people from physical and psychological harm arising from violence and coercion.

Meaning: people are protected from violence, from being forced or induced to act against their will and from fear of such abuse.

4. Assist people to claim their rights, access available remedies and recover from the effects of abuse.

The affected population is helped to claim their rights through information, documentation and assistance in seeking remedies. People are supported appropriately in recovering from the physical, psychological and social effects of violence and other abuses.

3.3 Preventing Sexual Exploitation, Abuse and Harassment (PSEAH)

All staff and programme participants should be treated with dignity and respect. In this regard, Help a Child gives particular attention to preventing sexual exploitation, abuse and harassment (PSEAH) and follows the core principles of the [IASC](#), which are further explained in the [Code of Conduct, Annex 1](#).

Help a Child has a zero-tolerance policy when it comes to sexual harassment, exploitation and/or abuse. In case of a SEAH complaint, investigation will take place, and if proven guilty, appropriate legal actions will be taken. As mentioned, Help a Child participates in the [Inter-Agency Misconduct Disclosure Scheme](#). This is further explained in Annex 4 [Integrity Reporting Procedure](#). In the meantime medical and psychosocial support is provided to the victim/survivor, including protection.

3.4 Child safeguarding

'Child safeguarding' is the responsibility that Help a Child has to ensure their employees and operations do not harm children; that it does not expose children to the risk of harm and



abuse, and that any concern the organization has about children's safety within the communities in which they work, is reported to the appropriate authorities.

All forms of abuse and exploitation suffered by children are unacceptable. Children need to be protected from harm and supported in an enabling environment in which children can develop holistically. Also, we believe all children have equal rights to be protected including those who are disabled, who are from minority ethnic/faith groups, and regardless of gender identity, sexual orientation, and culture.

[Help a Child's Child Safeguarding Policy](#) is to be found in [Annex 2](#), clearly emphasizes the rights children have to be protected from abuse and exploitation. It sets out the responsibility Help a Child has to ensure that all representatives of Help a Child and Help a Child's partners are given guidance about the standards of behavior and practice required of them at all times when they are in contact with children. The policy also formulates guidelines for incorporating Child Protection into programs and other work.

In line with our vision and mission, we acknowledge the protection of children is a human right. The Child Safeguarding Policy is, therefore, based on the UN Convention on the rights of the child. To align with internationally recognised standards and good practice Help a Child has become a full member of the [Keeping Children Safe Network](#) and is committed to meet Keeping Children Safe's standards for child protection.

Any child protection issue caused by anyone who is not an employee or other representative of Help a Child, is outside the scope of this policy. It needs to be dealt with through the (community) child protection mechanism in the local context, or any other local authorities or protection systems in place. Help a Child however, will support the set-up or strengthening of these community protection mechanisms, for as much as possible.

3.5 Financial integrity

Help a Child aims to ensure that the organization manages its finances responsibly, and to be transparent in how the money is used to carry out its mission. Help a Child not only aims for donor accountability and addressing expectations of donors, but also wants to be accountable to its employees and the people it supports. Help a Child expects its employees and others working on behalf of the organization to commit to lawful and ethical behavior, also when it comes to financial management and the organization aims to prevent and act upon financial misconduct.

More on Help a Child's norms, values and rules regarding financial integrity can be found in [Help a Child's Anti-Fraud and -Corruption Policy in Annex 3](#).



4. Prevention and awareness plan

Preventing a breach of code of conduct, such as sexual abuse, exploitation and other forms of misconduct, is far better than **responding** to it. There are several ways in which Help a Child is working on prevention, including **background and reference checks** of candidates, as part of the hiring process. Help a Child participates in the Inter-Agency Misconduct Disclosure Scheme which means that all reference checks include a written questionnaire. This will be sent to past employers about misconduct like sexual exploitation, abuse or harassment. Granting references by Help a Child will be subject to the Scheme as well.

Another way of prevention is providing new employees **with training** on Help a Child's Integrity & PSEAH policy as well as frequent reminders and follow-up by the Integrity Focal Points and Integrity Coordinator. It is Help a Child's duty to create awareness among its staff, partners, and target communities about their rights and what to do to claim those rights and report misconduct. For communities, this is captured in our Community Based Complaints and Feedback Mechanism.

An integrity audit is incorporated in the regular internal audits conducted in all Help a Child offices and among each partner organization. Results of these audits will be used as learnings on which improvements of the organization's integrity procedures will be based.

This chapter describes further what Help a Child will do in its efforts to prevent misconduct and to ensure awareness on the Integrity & PSEAH policy, including the ways to report misconduct, is created among its own employees and people participating in its projects.

4.1 Terms of Reference Help a Child Integrity Team

The Help a Child Integrity Team consists of the Integrity Coordinator, Integrity Response Team, and the Integrity Focal Points.

Terms of Reference of Integrity Coordinator

Help a Child assigned a corporate Integrity Coordinator to lead the international Integrity Team. The integrity coordinator is responsible for the following (based on the job description):

- leading the Help a Child Integrity Team, including the Integrity Focal Points who are based in the Help a Child country offices and Integrity Advisors, advising on the different aspects of the policy;
- building the capacity of the Integrity Focal Points based on the training plan and Integrity & PSEAH policy;
- ensuring awareness is created among employees on the organization's Integrity & PSEAH policy and procedures;
- reviewing the Integrity & PSEAH policy every two years;
- coordinating and monitoring implementation of the Integrity & PSEAH policy;
- analyzing and coordinating follow up on integrity issues being reported; and

- taking part, together with the management, in risk assessment and audits, focus on vulnerabilities; and,
- leading the Integrity Team, consisting of the Integrity Coordinator, Integrity Advisors and all the country Integrity Focal Points. The Integrity Team meets at least two times a year via Teams or during the Strategic Consultation Meetings (SCM) to discuss (fictional) cases, policy implementation and whether the policy needs to be updated.

Terms of Reference: Integrity Response Team

When integrity issues are reported, the Integrity response Team will receive this via e-mail or WhatsApp, from the Integrity Focal persons in the country who are asking for assistance; or from any other person in or outside the organization. This team is based in The Netherlands office and consist of 3 experienced humanitarian aid workers (2 female, 1 male) with extensive work experience in Sub Saharan Africa. They will do a first assessment, checking facts, hearing the complaints and the accused. In case of an SEAH concern, the PSEAH network in country will be contacted for assistance. Advise will be provided to the CEO and Human Resource Manager on steps to take.

Terms of Reference: Integrity Focal Points

In each Help a Child country office one person is selected to fulfill the role of Integrity Focal Person. (In case of more Help a Child offices in a country, each office should have designated integrity person, who reports to the Integrity Focal person of the country.) This focal person has the following tasks:

- Ensuring all Help a Child employees, consultants, trainees, interns and volunteers, (sub)-contractors and integrity focal point of partner organizations are aware of the Help a Child integrity principles and procedures at country office level;
- strengthening capacity of staff and integrity focal point of partners bi-annually;
- coordinating and monitoring implementation of the Integrity & PSEAH policy at country level;
- providing the Integrity Coordinator with bi-annual monitoring reports and feedback to be used as input for the Integrity & PSEAH policy review;
- handling reported integrity incidents or concerns as described in Annex 4; and,
- ensuring community awareness on integrity issues and mechanism of reporting is being created.

4.2 Employees recruitment and capacity building

Recruiting the right employees and strengthening their capacity is crucial for maintaining high integrity standards. Help a Child has specific recruitment procedures for new staff and anyone who acts on behalf of Help a Child.

Recruitment

All Help a Child applicants are informed via the published job vacancy and during job interviews about Help a Child's expectations and standards of working regarding integrity, as well as the applicant screening steps. Applicants are interviewed at least twice, by multiple persons, preferably face-to-face, and these interviews cover explicit questions on integrity. For all Help a Child staff positions a criminal record check and a reference check is part of the application procedure. References are conducted in line with the [SCHR Inter-Agency Misconduct Disclosure Scheme](#).

Regarding consultants, trainees, interns and volunteers, and (sub)-contractors this screening and reference check is only required for high-risk positions/assignments (e.g. direct contact with children, managing finance, etc.).

This screening on integrity serves three goals: (1) demotivating people with wrong intentions to apply; (2) adequate screening of candidates during the application process and excluding candidates with an increased risk of unacceptable behavior; and (3) new employees understand how much importance the organization attaches to integer behavior.

When signing the employment contract, everyone will be required to sign the Help a Child Integrity & PSEAH policy as part of this contract. More specific information on the procedures related to Help a Child's recruitment procedure can be found in the Help a Child HR Policy.

Should any concerns about someone's integrity arise during the probation period, the issue should be discussed with the line manager together with the HR Manager. The line manager together with the HR Manager will decide what action to take. Furthermore, when a staff member resigns an exit interview will be held to find out the reason of resignation.

Capacity strengthening

Help a Child developed a training plan to schedule all necessary online and offline training for each of the staff members and others (such as consultants and board members). This plan clearly sets out which trainings are intended for whom, as well as when, and how often they should be attended.

All new employees follow mandatory online courses on integrity and related topics via the Help a Child Academy (e-courses) during the first three months of their contract. Face-to-face trainings are provided on Child Safeguarding and PSEAH.

Furthermore, to refresh knowledge and skills on integrity, bi-annually each Help a Child office team will hold an 'Integrity workshop'. This workshop will be prepared and led by the Line Manager for the teams in the Netherlands and in the countries by the Integrity Focal



Point, or Integrity Team. The workshop could start with a session on the main procedures mentioned in the Integrity & PSEAH policy, which is followed by a more interactive session during which all staff members will discuss various case studies on integrity issues, moral dilemmas and/or vulnerabilities and risks regarding integrity within the organization.

Depending on their assignment (e.g. having direct contact with beneficiaries), trainees, interns and volunteers, and (sub)-contractors will also receive training on integrity. Furthermore, any person travelling on behalf of Help a Child – e.g. Supervisory Board members, consultants – and visiting a Help a Child country office, a partner organization, and/or a Help a Child project site, will participate in an e-learning which will be part of the mandatory safety and security process steps. This does include an e-learning module on the Code of Conduct.

As mentioned in the previous section, the Integrity Coordinator & Team will build the capacity of the organization's Integrity Focal Points and will provide supervision and coaching. The Integrity Coordinator will make sure the focal points gain knowledge and understanding of:

- how to identify and respond to misconduct, including abuse and exploitation;
- where misconduct, including abuse and exploitation, can take place;
- the integrity risks in the organization and how to develop a mitigation strategy;
- security of (child) data and confidentiality;
- guidelines for child sponsorship, including sponsor visits;

4.3 Procedures for partner organizations

When identifying our partners, extensive research takes place, covering an analysis of the culture/background of the partners' organizations and its decision makers, including documentation regarding anti-corruption/anti-fraud and (child)protection issues. This is part of a required Organizational Capacity Assessment. A **Memorandum of Cooperation** will be signed between the partner organization and Help a Child, which specifies clearly the Integrity & PSEAH policy requirements. All partners of Help a Child have to adhere to the following minimum requirements regarding integrity:

- All partner organizations need to have policy and procedures on integrity (e.g. on recruitment, induction, etc.) in line with the Help a Child Integrity & PSEAH policy.
- All partners need to have feedback and complaints reporting mechanisms in place and procedures for follow up on these reported issues (needs to appear from practice).
- All partners need to have a focal person for integrity.
- All partners need to ensure their employees know about and understand the policy and procedures on integrity.
- All partners need to raise awareness among project target groups about their organization's integrity & PSEAH policy and procedures, including the ways to report integrity issues. Also, the partner is expected to have guidelines in place on communication with children.



As said before, partners will be provided training on integrity by the Help a Child Integrity Focal Person – and by the Integrity Coordinator and the team if required. This training will take place within one year after the Memorandum of Cooperation has been signed. The training includes a session on Do No Harm Principles.

Besides capacity building of partners, monitoring on the implementation of the Help a Child Integrity & PSEAH policy and procedures will also become part of the Program Audit, an audit which takes place at least once every two years, for each of the offices and partners.

Information on Help a Child’s reporting procedures, also for partners, can be found in [Annex 4 Integrity reporting procedure](#). Every partnership agreement is expected to mention the partner’s obligation to report any breach of the Help a Child Integrity & PSEAH policy (for example a breach by a Help a Child staff or own partner staff member).

4.4 Help a Child integrity strategy for communities

It is important to raise awareness among the communities Help a Child works with about the Integrity & PSEAH policy and related procedures. This will help them, amongst others, to ensure they know their rights and responsibilities and know how to report concerns and/or complaints. Therefore, each new project will start with a community consultation regarding the preferred communication channels and an induction workshop on integrity and establish a fully functional **Community Based Complaints and Feedback Mechanism (CBCFM)**. Help a Child country offices are expected to describe this process in their annual plans and to take this into account when developing project workplans and budgets. Not only at the start, but also throughout the project duration, communities should be reminded of their rights, responsibilities, and ability to report. At the same time, it is important that they are also actively enquired about their opinions on the project, the staff, and any other topics on which they can give their feedback. The result will be a clear Community Based Complaint and Feedback Mechanism, with both pro-active and reactive channels in place, and followed up throughout the project by the project staff.

Referral pathway

Integrity is important in all projects, also if they are not focused on children only. Help a Child aims to make “integrity” a cross-cutting theme in every project. For cases of sexual exploitation and abuse, a local referral path is established, to be able to refer survivors to protection services (e.g. medical services, legal services, psycho-social services, police, community development/probation office, community leaders), This referral pathway will also be used in all cases of abuse within the community, not only those cases where Help a Child staff or associates are involved.

4.5 Staff care

Since Help a Child employees often work in more remote areas among people living in distress and often work far away from home, stress levels of employees might go up. People might have different ways to deal with this stress. There are positive coping mechanisms – sport, praying, sharing with friends, etc. – but there are also negative coping mechanisms, such as drinking excessive amounts of alcohol. It is Help a Child’s duty of care to limit the

amount of stress to which employees are exposed and to support employees in dealing with stress. Therefore, the following is provided for employees exposed to extra stressful situations:

- Good Rest and Recuperation (R&R) possibilities (e.g. employees being able to visit family regularly).
- Stress-management training (basic training on what employees and the office can do to deal with stress levels, e.g. providing a prayer room or sports facilities).
- Safety and security awareness training;
- Critical incident support: in each Help a Child country of operation a few possibilities for (external) services will be selected, for support in case of any critical incident. It is important for employees to feel supported and to get psychosocial care, which helps them to deal with the incident.



5. Reporting procedure and confidential counseling

Annex 4 covers the **Integrity Reporting Procedures**, which describe the procedures Help a Child put in place to allow project participants, employees, partners and other stakeholders of Help a Child to share feedback, concerns and complaints on communications, actions and behavior related to our work, have them heard and properly addressed. Each person signing the Help a Child code of conduct is signing for the obligation to report any concern related to a breach of the Integrity & PSEAH policy.

Help a Child has several reporting channels in place. Reports will be analyzed properly and timely by the relevant country Integrity Focal Point, or the Integrity Response Team, Based on this analysis the Integrity Focal Point(s) involved and the Integrity Response Team will advise HR and the CEO if and what kind of further investigation is required. In some cases the Integrity Focal Person, together with the Country Director will be able to deal with it in country. In severe cases the Integrity Response Team will be involved. If investigation is required in a SEA case, an investigation team will be established, in cooperation with the **PSEAH networks in country** or in cooperation with KCS. The investigation will take place. An alleged perpetrator is innocent until proven guilty.

Appropriate action will be taken if staff is found guilty Depending on the severity appropriate actions might include termination of contract and legal action if required, as described in the employment conditions manual. Help a Child has a zero tolerance against sexual exploitation and abuse. Any substantiated and proven case of sexual exploitation and abuse will always lead to direct termination of employment and report to **appropriate authorities**. **Donors** will be informed accordingly. Help a Child will keep records of reported cases and its response. Only the CEO and the HRM have access to this database. Help a Child will report annually the number of cases and the type of response, in case of an audit the database will be shared, taking into account the privacy of people reporting and reported.

Confidential counselling

Help A Child has a designated counsellor. The function of the counsellor is intended to give employees, volunteers, trainees, interns, contractors and temporary workers of Help A Child the possibility to approach an independent person, if they face or have faced problems concerning improper or unfair treatment, integrity issues and/or abuses in the organization. In **Annex 6**, you will find more information.

Whistleblower procedure

The Integrity Reporting Procedure, focuses on providing beneficiaries, staff, partners, and other stakeholders a structured way to report concerns related to breaches of the Help a Child code of conduct through various channels and a Community-Based Complaint and Feedback Mechanism (CBCFM). **Annex 5, the Whistleblowing and Misconduct Reporting Procedure**, is designed specifically for staff, affiliates, and external stakeholders to report potential malpractice or wrongdoing within the organization, ensuring confidentiality and protection against retaliation for whistleblowers



6. Help a Child Integrity & PSEAH Policy - declaration

I have clearly read and understand the Help a Child Integrity & PSEAH policy that consists of:

- Help a Child integrity & PSEAH policy - general
- Annex 1 - Help a Child Code of Conduct
- Annex 2 - Child Safeguarding Policy
- Annex 3 - Anti-Fraud and Corruption Policy
- Annex 4 - Integrity Reporting Procedure
- Annex 5 - Whistleblowing and misconduct reporting scheme
- Annex 6 - Confidential Counselling Scheme

I confirm that I will adhere at all times to the standards of behavior described in it and will comply with any future revisions of the policy.

I declare that I have never been convicted of any offence involving any type of harm to a child or adult, nor have I ever been warned or cautioned in relation to such a matter.

I also declare that there are no civil or criminal proceedings of any nature pending against me at the date of this declaration relating to any allegation concerning any type of harm to a child or adult.

Name

Signature

Place

Date



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