

PURPOSE:

This policy sets out FHI 360's guiding principles and approach with respect to preventing and dealing with abuse, exploitation or neglect of children who are served by FHI 360 programs or come into contact with FHI 360 personnel implementing those programs.

SCOPE:

This policy applies to all FHI 360 employees (including temporary and contract employees), employees seconded to FHI 360, consultants, fellows, interns, and volunteers ("FHI 360 personnel") worldwide.

DEFINITIONS:

1. *Child* – A person under 18 years of age.
2. *Child abuse, exploitation or neglect* – Any form of physical abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; or commercial, transaction, labor or other exploitation resulting in actual or potential harm to the child's health, well-being, survival, development or dignity.
3. *Emotional abuse or ill treatment* – Injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics, including, but not limited to, humiliation, control, isolation, withholding of information, or any deliberate activity that makes the child feel diminished, embarrassed or fearful.
4. *Exploitation* – The physical, sexual, emotional or other abuse of a child where some form of remuneration is involved or where the perpetrator benefits in some manner.
5. *Neglect* – the failure to provide for a child's basic needs where FHI 360-sponsored programs and staff have a clear responsibility for the care of the child in the absence of the child's parent or guardian.
6. *Physical abuse* – Acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm or risk of harm to a child's health or welfare, or death, including, but not limited to, punching, beating, kicking, biting, shaking, throwing, stabbing, choking, hitting (regardless of object used) or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.
7. *Sexual abuse* – Fondling a child's genitals, penetration, incest, rape, sodomy, indecent exposure, and exploitation through prostitution or production of pornographic materials.

POLICY:

1. Statement of Policy
 - 1.1 FHI 360 takes seriously its responsibility to protect the dignity, rights and well-being of all children involved in its programs and activities around the world. The Company is

committed to providing a safe environment for children by holding all personnel to high standards of conduct and implementing policies and procedures to prevent and respond to instances of child abuse, exploitation or neglect.

- 1.2 FHI 360 strictly prohibits all FHI 360 personnel from engaging in any form of child abuse, exploitation or neglect.
- 1.3 All FHI 360 personnel must comply fully with host country and local child welfare and protection laws or with international standards, whichever gives greater protection, and must comply with U.S. law where applicable.
- 1.4 FHI 360 personnel implementing projects must take measures to reduce the risk of child abuse, exploitation or neglect. Examples of such measures include limiting unsupervised interactions with children; prohibiting exposure to pornography; and complying with applicable laws, regulations or customs regarding photographing or filming children.

2. Reporting Requirements

- 2.1 FHI 360 personnel who observe, suspect, or receive allegations of child abuse, exploitation or neglect must immediately report it to FHI 360. FHI 360 personnel are required to report to FHI 360 any violations of this policy or any related procedures. All allegations of abuse, exploitation or neglect, including those from children, must be treated seriously and reported for investigation. Reports may be made via FHI 360's anonymous compliance hotline (1-800-318-7153 in the US, or 1-561-207-2600 internationally) or anonymous reporting website at <http://www.fhi360.org/anonreportregistry>. In addition, reports may be made to any FHI 360 supervisor, senior Country Office management, or HQ Human Resources (HR) representative. Any FHI 360 supervisor, member of senior Country Office management, or HQ HR representative who receives such a report is required to immediately forward the report to FHI 360's Office of Compliance and Internal Audit or Office of the General Counsel.
- 2.2 FHI 360 personnel should notify local law enforcement, social services or child protection authorities if they believe immediate action is necessary to ensure the child's safety or prevent future harm, or they believe any law has been broken.
- 2.3 FHI 360 will investigate all reports of suspected child abuse, exploitation or neglect and take appropriate remedial action, including, but not limited to, notifying law enforcement and cooperating with criminal investigation and prosecution where appropriate.
- 2.4 FHI 360 strictly prohibits retaliation against an FHI 360 employee who reports suspected child abuse, exploitation or neglect or other violations of this policy or related procedures. Employees may report suspected child abuse, exploitation or neglect without fear of reprisal. FHI 360 personnel who engage in any form of retaliation against those who report suspected child abuse, exploitation or neglect or other violations of this policy are subject to disciplinary action, up to and including termination of employment with FHI 360.

3. Consequences of Violations

- 3.1 FHI 360 personnel who commit child abuse, exploitation or neglect; fail to report or forward reports of suspected child abuse, exploitation or neglect; or otherwise violate this policy or related procedures will be subject to disciplinary action, up to and including immediate termination of employment.

Title Safeguarding of Children

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RELATED DOCUMENTS:

1. Policies

- POL 01029: Combating Trafficking in Persons
- POL 03004: Open Door and No Retaliation
- POL 03011: Employee Discipline
- POL 03025: Recruitment

2. Standard Operating Procedures

- NA

3. Appendices

- NA

REFERENCES:

1. USAID Standard Provision M25 regarding Child Safeguarding (June 2015)

POLICY REVISION HISTORY:

POL#	Date Reviewed	Summary of Changes
POL 01030	12/09/15	New Policy