



# **Safeguarding Policy and Practice Guide**

Revised: June 2025

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## 1. Introduction

### How to use this policy and practice guide:

This document contains policy requirement statements and practice guidance. *Policy statements are italicized throughout the document.* Practice guidance is additional information provided as background, educational material, or expanded discussion or interpretation on policy statements and should be used to enhance knowledge and inform, improve, and enhance practices.

The policy statements are found in section 2 of this document and at the beginning of each subsection in section 3. They represent the requirements of this safeguarding policy and are always *italicized*. Following the policy statements is an Acknowledgement and Declaration of Conduct form that all employees, staff members, board members, missionaries, interns, and/or volunteers of Kids Alive International and affiliates must sign.

The practice guidance is found in section 3 of this document. The guidance provides depth, context and examples which make clearer the intent and interpretation of the policy. The practice guidance is for everyone signing the policy and should be widely available to inform and enhance practices.

## 2. Safeguarding Policy

### 2.1 Safeguarding Policy Requirement Statements

# Safeguarding Policy Requirement Statements

Revised: June 2025



### 1. Purpose

*One of Kids Alive International's (KAI) global goals is for children and vulnerable adults in our ministry to experience emotional and physical well-being. A critical component to meeting that goal is that everyone is and feels safe. Therefore, it is critical to have proper safeguarding measures in place to ensure participants are not harmed through our ministry and to support the healthy well-being of all. The purpose of this policy is to educate, prevent, identify, and respond to allegations of abuse and misconduct. It is designed to reflect safeguarding and protection best practices and ensure Kids Alive International personnel appropriately address safeguarding measures and concerns that arise when working with vulnerable populations.*

### 2. Scope

*This policy applies to and constitutes a mandatory agreement for all Kids Alive International personnel and programs, including those supported by KAI and affiliates of KAI. It applies to safeguarding, child protection, and abuse and neglect concerns related to all children and vulnerable adults participating in a Kids Alive International program and is also meant to serve as a protective measure for those serving such children and vulnerable adults.*

### 3. Definitions

- **Safeguarding** is the broad term that encompasses actions taken to promote the welfare of children and protect them from harm.
- **Child protection** is part of the safeguarding process and focuses on protecting individual children identified as suffering or likely to suffer significant harm.
- A **child** is anyone under the age of 18. **Note:** The terms "adolescent", "youth", and "young person" may be used interchangeably with "child".
- A **vulnerable adult** is anyone 18 and over who participates in a Kids Alive International (or affiliated) program(s) by receiving care, support, or protection and is unable to protect themselves from either the risk of, or experience of abuse or neglect. **Note:** The terms "young adult" and "young person" may be used interchangeably with "vulnerable adult".
- **Abuse** is any act or series of acts of commission or omission by a parent, caregiver, or another person responsible for the care of a child or vulnerable adult that results in harm,

*potential for harm, or threat of harm to a child or vulnerable adult. Different forms of abuse include: discriminatory abuse; emotional abuse (sometimes referred to as “psychological” or “mental” abuse); domestic violence (DV), family violence (FV), and intimate partner violence (IPV); financial abuse; internet abuse and abusive images of children; neglect; organizational or institutional abuse; physical abuse; sexual abuse; sexual exploitation; and spiritual abuse.*

- **Best Interests of the Child:** *This term pertains to the principles that are used to assess and determine each individual child’s circumstances, needs, and wishes with that child’s safety and well-being as the paramount concern.*
- **Cultural Competence:** *The ability of individuals and systems to respond respectfully and effectively to people of all cultures, classes, races, ethnic backgrounds, sexual orientations, and faiths or religions in a manner that recognizes, affirms, and values the worth of individuals, families, tribes, and communities and protects and preserves the dignity of each.*
- **Mandated Reporter:** *Individuals that are required to report instances of suspected or disclosed abuse to the police or other appropriate authorities. **Note:** All KAI personnel and affiliates are mandated reporters.*
- **KAI Personnel:** *For purposes of this policy, unless otherwise indicated, references to “personnel” will include the following: employees, staff, missionaries, interns, and volunteers. **Note:** Visitors are addressed in Section 3.8: Visitors.*
- **Prevention:** *Activities that stop a negative action or behavior and promote a positive action or behavior.*

#### 4. Staff Screening and Adherence to Requirements

*Safeguarding expectations and responsibilities will be included in all job postings and discussed during interviews. All prospective personnel will provide references and submit to a background check and any additional country-specific legal requirements for pre-employment screening. Prior to starting work, all personnel will complete a mandatory orientation of this policy and sign an agreement indicating they are aware of, support, and will abide by its contents. In addition, any child of a personnel member who is living on a children’s home campus, or who has access to children, must also complete a mandatory orientation of this policy and sign an agreement indicating they are aware of, support, and will abide by its contents when they attain the age of 18 and annually thereafter while residing on campus. Assessments of each staff member’s adherence to this policy will be documented in all performance reviews and periodic evaluations that will be maintained in the personnel’s human resources file.*

#### 5. Education and Training

*Training on this policy and safeguarding and child protection efforts will be provided to all personnel as part of their initial orientation and, at a minimum, on an annual basis thereafter.*

*The children and families KAI works with will also be provided education and training on safeguarding, child protection, and this policy.*

## **6. Safeguarding Officers**

*Each Kids Alive country program will appoint at least one Safeguarding Officer to support the implementation and monitoring of this Safeguarding Policy. Safeguarding officers are also responsible for reviewing related procedures and practices; conducting audits and risk assessments; assisting with training; participating in responding to concerns, inquiries, and investigations; and taking action to mitigate or eliminate any identified safeguarding risks. Anyone may contact a safeguarding officer to share safeguarding concerns.*

## **7. Interaction Between Children and Adults**

*All Kids Alive personnel must treat each child, adolescent, and vulnerable adult with dignity and respect, regardless of differences of ethnicity, religion, age, ability, gender, sexual diversity, class, and economic circumstances. Personnel will not commit or participate in any type of abuse or neglect or commit any act in violation of this policy or national and international laws on the rights of the child, either during work hours or during their personal time. Personnel will make every effort to mitigate the possibility of a concerning situation, ensuring use of appropriate physical contact with children, establishing appropriate boundaries with children, and reporting concerns of any potentially inappropriate contact with children. Communication between children or vulnerable adults and donors will occur in compliance with parameters established by the Global Support Team.*

## **8. Visitors**

*Visitors are individuals who are not considered KAI personnel. Visitors must abide by this policy as well as additional country and site-specific requirements. Visitors will respect and maintain confidentiality and privacy guidelines for the safety of the children and vulnerable adults in KAI programs. All interactions between visitors and children must occur on fully visible common spaces on KAI grounds and be supervised by at least one Kids Alive staff member at all times; visitors are not to be taken to the homes of children or adult beneficiaries in KAI programs. Personnel will be responsible for ensuring that the children are protected from any inappropriate activity. Accommodation is not provided to visitors on KAI campuses or sites where children in KAI programs are housed. Each country should have site-specific rules and procedures posted in visible and appropriate locations to ensure that all interactions between visitors and children are appropriately managed and supervised and that opportunity for unauthorized contact does not exist.*

## **9. Organizational Communications**

*KAI has a responsibility to the children and families we serve to ensure their right to privacy is respected and upheld, they are treated with dignity, and no publication, photograph, video, or other media or communication jeopardizes their safety or otherwise puts them at further risk. Identifiable pictures or images of children in protective custody (i.e. removed from their parents' custody) will not be utilized in KAI's communications or media. Identifiable pictures or images of*

*children involved with KAI programs who are in the custody of their parents may be taken and used as long as the child's parent or legal guardian has provided written permission and consent to KAI. Adult beneficiaries may provide written consent for themselves. All written permission and consent forms will be kept on file by KAI country offices. Visitors, including Go Team or vision trip members, and foster families may not take pictures of children or vulnerable adults in KAI programs unless specifically authorized in advance in writing to do so. Even when written permission is obtained, KAI will ensure its internal and external communications prioritize the child and family's right to safety, privacy, and dignity.*

## **10. Digital Safeguarding and Internet Use by Children**

*Each program country will develop clear policies and procedures for internet use that are relevant to the context of its individual programs and that have the safeguarding and protection of children as paramount importance. These policies and procedures, at a minimum, will align with the following:*

- Use of the internet will be closely supervised and monitored by trained Kids Alive personnel. This function should be included as part of the designated personnel's job description.*
- Computers that have access to the internet will be in rooms which allow for frequent and easy access by staff and where the screens are clearly visible.*
- Appropriate restrictions on times when the internet can be used.*
- Kids Alive personnel must not access pornography or other inappropriate content on the internet.*
- Kids Alive International reserves the right to confiscate and fully investigate online activity engaged in on KAI property and in KAI programs. Internet users are expected to utilize resources safely and responsibly as to not abuse, harass, or embarrass themselves and others.*

## **11. Reporting Safeguarding Concerns or Policy Violations**

*Just as this policy is key to reaching KAI's goal of children experiencing physical and emotional wellbeing, reporting concerns and violations is a critical part of our KAI value of Integrity. We are to be transparent, honest and accountable in our relationships, stewardship, and results. That includes being transparent, honest and accountable in our relationships with children and vulnerable adults. All Kids Alive personnel and affiliates are responsible and obligated to report any suspicions of abuse, safeguarding concerns, and any violations of Kids Alive's Safeguarding Policy within 24 hours of becoming aware of them. Any allegations or concerns of abuse should be reported via the Safety Reporting Process (found in Appendix A) or directly to any of the following: the country's Safeguarding Officer(s), the Country Director (CD), the Regional Vice President (RVP), or the Global Lead, Safeguarding. Any of these individuals will ensure that the other necessary individuals are notified within 12 hours, unless one of those is the subject of a report. A reporting form (found in Appendix B) is available to use for compiling and submitting a report. Upon receipt of a report, the relevant individuals will determine and implement appropriate action.*

*Kids Alive personnel and affiliates reporting safeguarding concerns or policy violations should not and will not avoid reporting on the basis that it may cause harm to the reputation of Kids Alive International. Good faith reports will not negatively impact the reporter, and the reporter will not be responsible for investigating the report or determining any potential violations or corrective actions.*

***If a child or vulnerable adult makes a disclosure to you:***

- *Listen carefully to what they are saying but do not ask too many questions*
- *Let them know they have done the right thing by telling you*
- *Tell them it is not their fault*
- *Say that you will take them seriously*
- *Do not confront the alleged abuser*
- *Explain what you will do next*
- *Report what the child has told you as soon as possible*

*Any allegation or concern of abuse must be treated seriously and addressed in a fair, impartial, thorough, thoughtful, and prompt manner in compliance with applicable laws. All responses to such reports or concerns will prioritize the individual's physical and psychological safety, well-being, and best interests.*

## **12. Grievances**

*Each program site will establish and adhere to a process for responding to grievances and complaints that have been expressed by a participant in its program, whether it is related to abuse or not. (If the grievance or complaint is related to abuse, the reporting procedure outlined in Section 3.11: Reporting Safeguarding Concerns or Policy Violations should be followed.) These processes will be child-friendly, allow for a variety of mechanisms and communication methods, and be developed in consultation with the children served by each program. This is a great way to practice KAI's value of Understanding as we listen to children, learn from them and show them we care enough to respond.*

## **13. Child-on-Child Abuse**

*Each program site will establish and adhere to appropriate supervision parameters and educational guidelines to reduce the risk of child-on-child abuse. In the event an allegation of child-on-child abuse is made by a child to KAI personnel, the KAI personnel will make a report consistent with Section 3.11: Reporting Safeguarding Concerns or Policy Violations of this policy. Regardless of who makes the allegation, an assessment will be conducted to understand what occurred, how it was able to occur, and what corrective actions are necessary. Corrective actions will then be implemented and monitored.*

## **14. Supporting Survivors**

*Kids Alive International is committed to supporting survivors of abuse through offering access to trauma-responsive counseling services, community resources, and support systems to aid them in the healing process. In some cases, survivors need access to medical evaluation and treatment.*

*Other methods of support include:*

- *In consultation with the child or vulnerable adult, developing a plan to address a survivor's safety and ensure provision of necessary services, support, and treatment*
- *Legal advocacy*
- *Assistance with food, childcare, and housing*
- *Specialized services for individuals with disabilities*

## **15. Policy Implementation, Monitoring and Review**

*Kids Alive International will provide training consistent with this policy to support its effective implementation. On an ongoing basis, Kids Alive International will monitor implementation of safeguarding policies in its programs and will ensure that effective procedures are in place.*

*The Safeguarding Policy is expected to be widely available at Kids Alive International sites, and easily accessible to the children, adolescents, parents, caregivers, personnel, and others that are affiliated with our organization. Additional programmatic specific policies will be developed by individual KAI countries, so that they are relevant to their specific programs and operations.*

*KAI will ensure that all risks of child abuse are identified, reported, monitored, and reasonably mitigated against in the assessment of all its activities. The Safeguarding Policy will be reviewed triennially by a comprehensive and inclusive committee of individuals involved with Kids Alive International at all levels and revisions will be made as appropriate to incorporate new learnings and best practices.*

## 2.2 Safeguarding Policy Acknowledgement and Declaration of Conduct

# Safeguarding Policy Acknowledgement and Declaration of Conduct



**As KAI personnel (i.e. an employee, staff member, board member, missionary, intern, or volunteer) with Kids Alive International, I affirm that:**

- I will conduct myself in a manner consistent with my position as a representative of Kids Alive International to be a positive role model to the communities we serve
- I will be respectful of each child's rights, background, culture, and beliefs, as set out in the UN Convention on the Rights of the Child
- I will adhere to the standards of conduct and behavioral expectations outlined in this policy, local laws, and good practice guidelines
- I will undertake, to the best of my ability, to protect the children and vulnerable adults in Kids Alive International's programs from any form of maltreatment and, consistent with the policy, will immediately report any concerns that I have regarding safeguarding issues
- I recognize that, should the terms of Kids Alive International's Safeguarding Policy be breached, immediate and appropriate action will be taken by Kids Alive according to the provisions set out within the Policy

**I confirm that I have received, read and understood Kids Alive International's Safeguarding Policy and agree to abide by this at all times with all children and vulnerable adults in Kids Alive International's programs, to protect both myself and them.**

Print Name: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

### 3. Practice Guidance

#### 3.1 Purpose

*One of Kids Alive International's (KAI) global goals is for children and vulnerable adults in our ministry to experience emotional and physical well-being. A critical component to meeting that goal is that everyone is and feels safe. Therefore, it is critical to have proper safeguarding measures in place to ensure participants are not harmed through our ministry and to support the healthy well-being of all. The purpose of this policy is to educate, prevent, identify, and respond to allegations of abuse and misconduct. It is designed to reflect safeguarding and protection best practices and ensure Kids Alive International personnel appropriately address safeguarding measures and concerns that arise when working with vulnerable populations.*

At Kids Alive International (KAI) we believe every child, even those with the most challenging needs, is a priority to God and far too many are overlooked, unheard, exploited, and threatened. Our mission is the call of Isaiah 1:17, serving these children by constantly learning better ways to meet their needs, earnestly seeking justice for them, empowering them for a healthy future, and advocating for community change.

The values that bring us alive as a team and that we teach the children in our programs are:

- **Faith:** We act in faith and believe in what God has called us to even when it is unseen. Our faith is first placed in God and then in each other as we work together.
- **Integrity:** We operate with transparency, accountability, and honesty in relationships, stewardship, and results.
- **Understanding:** We humbly seek to understand before being understood. We listen, we learn, and we care.
- **Self-control:** We focus on what we are called to do and partner with others to complement our ministry.
- **Perseverance:** We are not defeated by trials nor circumstances as we focus on long-term change.
- **Devotion to God:** We love God and worship Him in all things. We are committed to being members of faith communities, to connect with God daily, and do all to shine His light.
- **Mutual Kindness:** We support each other with grace, respect, honor, prayer, and care.
- **Love:** As God loves us, we love ourselves and others and we intentionally take time to refresh, renew, and strengthen our minds, bodies, souls, and spirits.

Kids Alive International is committed to providing a safe environment that promotes the best interests of all individuals who come into the care of and/or participate in faith-based programs that are affiliated with Kids Alive International. Kids Alive recognizes that childhood is a developmental period that is entitled to special care and assistance. As such, to promote full and

harmonious development, children should be in trauma-informed and responsive environments that prioritize safety, understanding, privacy, confidentiality, happiness, and love.

### 3.2 Scope

*This policy applies to and constitutes a mandatory agreement for all Kids Alive International personnel and programs, including those supported by KAI and affiliates of KAI. It applies to safeguarding, child protection, and abuse and neglect concerns related to all children and vulnerable adults participating in a Kids Alive International program and is also meant to serve as a protective measure for those serving such children and vulnerable adults.*

Kids Alive International is responsible for ensuring that anyone who represents the organization actively safeguards children and vulnerable adults from abuse through good practice, receives adequate training on safeguarding best practices, reports all concerns and suspicions of abuse and maltreatment, and responds appropriately to disclosures and allegations of abuse. Consistent with the United Nations Convention on the Rights of the Child (UNCRC), Kids Alive prioritizes the best interests of each child in all decisions and actions.

Kids Alive recognizes that children depend on and internalize messages from parents, teachers, and other caregivers to gain an understanding of healthy relationships and emotional expression. Adult expectations can often be seen as obligatory rules to children. Therefore, it is crucial that all Kids Alive personnel understand the gravity of their words and actions when working with children and vulnerable adults and model healthy relationships and emotional expression. In doing so, we strive to ensure that all those serving within our programs understand and conduct themselves consistent with the following principles:

#### **Adverse Childhood Experiences (ACEs):**

Adverse Childhood Experiences are potentially traumatic events that occur during childhood. They are linked to a variety of long-term negative outcomes relating to infectious disease, chronic disease, risky behaviors, injury, mental health, maternal health, education, job opportunities, and earning potential. Having one or more ACEs contributes to a child's overall vulnerability. Therefore, Kids Alive International is committed to identifying, mitigating, and proactively addressing the consequences of ACEs through program design with the goal of preventing them from occurring in the first place or preventing additional harm. Program design should include implementing preventive and protective factors to address violence and adversity, community resources and connections for children and families, and primary intervention practices.

#### **Trauma-Informed and Responsive Care:**

Trauma-informed and responsive practice involves an ongoing awareness of the effects of traumatic events on children, families, and professionals who work with vulnerable populations. It includes being cognizant of how certain actions, environments, and language patterns have the potential to re-traumatize or trigger victims and survivors of traumatic situations. To develop programs that are trauma informed, Kids Alive is dedicated to integrating trauma awareness and knowledge, screening for trauma exposure and trauma symptoms, recognition and prevention/treatment of secondary traumatic stress, and referral to evidence-

supported treatments and resources into its design. The goal of trauma-responsive care is to help children and families heal in a holistic manner that addresses their physical, cognitive, and socio-emotional well-being and puts protective factors in place to heal and build resilience and prevent further trauma. Kids Alive International personnel will be trained in trauma informed and trauma responsive practices, including Trust-Based Relational Intervention® (TBRI), a therapeutic model that trains caregivers to provide effective support and treatment for children who may be considered at-risk or vulnerable.

### **Child Rights and Responsibilities:**

We recognize that instead of *objects* in need of protection, children are capable and intelligent *subjects* who are entitled to the protection of their rights and safety. Kids Alive demonstrates its commitment to educating children, their adult guardians, caregivers, educators, and communities that every child has a right to basic needs such as food, clothing, shelter, health care, and education; a right to a moral upbringing, a peaceful childhood that includes the right to play, a safe environment free of abuse, and the right to be cared for and protected. In addition to having these rights, children also have responsibilities and should receive appropriate support to meet their responsibilities. These responsibilities include but are not limited to: cooperating with others in community; treating others with respect and care; learning to the best of their ability; respecting and relating appropriately to authority figures including caregivers; and reporting safety concerns and all forms of abuse and/or exploitation. Kids Alive embraces the following principles and approaches in respecting children's rights and responsibilities:

- Staff are to use trauma-responsive developmentally and age-appropriate ways of communicating with children, whether they are victims or perpetrators; and seek opportunities to train partners and justice-focused professionals to also use these appropriate approaches.
- Children's witness testimonies should occur in compliance with legal regulations taking into account that children should not be forced or coerced to testify against their abusers and that legally-acceptable means of accommodations should be utilized to help a child feel more comfortable in such a setting.
- Kids Alive supports and promotes societal accountability and restorative processes that allow children who have committed an offense to be rehabilitated, while addressing trauma that they may have both endured themselves and caused to others, as opposed to treating them as criminals.

### **Child and Vulnerable Adult Empowerment:**

Children and vulnerable adults in Kids Alive programs are encouraged to exercise their voices and have their concerns heard and responded to in age-appropriate ways. The voices of vulnerable children and adults are protected in their best interest, from misappropriation, abuse or causing further harm or damage. Children voluntarily participate in their own capacity-building and that of their peers, as appropriate, by contributing to training content and methodology, and in other age-appropriate ways such as peer-to-peer training and monitoring. Children are equipped and empowered to keep themselves safe, with a clear understanding of

their rights and responsibilities, appropriate versus inappropriate subjection to and exercise of authority, touch and behavior, and knowledge of and easy access to safe reporting mechanisms and support for concerns and allegations.

### 3.2 Definitions

- **Safeguarding** is the broad term that encompasses actions taken to promote the welfare of children and protect them from harm. It consists of concepts and practices that are vital to creating a safe environment for children and vulnerable adults. This includes creating inclusive and welcoming environments, enabling children and vulnerable adults to participate in decisions that affect them, cultural competence and safety, promoting just treatment and respect and having child and vulnerable adult protection systems.
- **Child protection** is part of the safeguarding process and focuses on protecting individual children identified as suffering or likely to suffer significant harm. It includes the set of laws, policies, regulations, and services needed to support harm prevention efforts and respond to protection-related risks.
- A **child** is anyone under the age of 18. **Note:** The terms “adolescent”, “youth”, and “young person” may be used interchangeably with “child”.
- A **vulnerable adult** is anyone 18 and over who participates in a Kids Alive International (or affiliated) program(s) by receiving care, support, or protection and is unable to protect themselves from either the risk of, or experience of abuse or neglect. **Note:** The terms “young adult” and “young person” may be used interchangeably with “vulnerable adult”.
- **Abuse** is any act or series of acts of commission or omission by a parent, caregiver, or another person responsible for the care of a child or vulnerable adult that results in harm, potential for harm, or threat of harm to a child or vulnerable adult. Different forms of abuse include: discriminatory abuse; emotional abuse (sometimes referred to as “psychological” or “mental” abuse); domestic violence (DV), family violence (FV), and intimate partner violence (IPV); financial abuse; internet abuse and abusive images of children; neglect; organizational or institutional abuse; physical abuse; sexual abuse; sexual exploitation; and spiritual abuse.
  - **Discriminatory Abuse:** This type of abuse occurs when someone is treated unfairly or differently because of a perceived or actual difference. It can include: verbal abuse, harassment, or slurs; denying access to services or providing substandard services; denying basic rights to education, healthcare, employment, or criminal justice; deliberate exclusion.
  - **Domestic Violence (DV), Family Violence (FV), and Intimate Partner Violence (IPV):**
    - Domestic violence (DV) is a violent or abusive pattern of behaviors used by one person to maintain power and control over another person in a

domestic situation. These behaviors can include physical, sexual, emotional, and economic abuses.

- Family violence (FV) is a single act, multiple acts, or continuing course of conduct between past or present spouses, persons who are parents of the same child, parents and children, stepparents and stepchildren, foster parents and children in foster care or other persons living or formerly living in the same household in the presence of a child, meaning the child is physically present or otherwise able to see or hear the act or conduct.
  - Intimate partner violence (IPV) is a course of conduct, not a single incident; it is a pattern of assault and/or coercive behaviors which may include physical, sexual, emotional, and economic abuses that a person uses against their current or former intimate partner to gain power and control in a romantic relationship.
- **Emotional Abuse, Psychological Abuse, Mental Abuse and Verbal Abuse:**
    - Emotional Abuse is a type of abuse that involves controlling someone's feelings and causing intense mental trauma. Abusers will often demean their victim, engage in victim blaming, and cause their victim to undergo intense humiliation.
    - Psychological abuse is a type of abuse involving the use of verbal and social tactics to control someone's way of thinking. Abusers will often convince the victim that they are crazy, manipulate them, or make harmful threats towards them.
    - Mental abuse means any willful action or inaction of mental or verbal abuse. Mental abuse includes, but is not limited to, coercion, harassment, inappropriately isolating an individual from family, friends, or regular activity, and verbal assault that includes ridiculing, intimidating, yelling, or swearing.
    - Verbal abuse is a type of emotional abuse that uses language and communication to cause harm. It is characterized by insults, name-calling, put-downs, criticizing, and other demeaning language designed to bully, intimidate, frighten, humiliate, degrade, and/or diminish the victim's self-worth and sense of safety.
  - **Financial Abuse:** The misuse or withholding of a person's resources to the disadvantage of the person and/or the profit or advantage of another person. Withholding money, stealing money, taking money as payment for coming to visit or spending time together, and restricting the use of finances are some examples of financial abuse.
  - **Human Trafficking:** Human trafficking refers to the recruitment, harboring, transportation, provision, or obtaining of an individual to obtain some type of labor or commercial sex acts for the purpose of subjection to involuntary

servitude, peonage, debt, bondage, or slavery. It should be noted that individuals who traffic children do not fall under one specific demographic. Anyone can be involved in the exploitation of others, including boyfriends, girlfriends, caregivers, fathers, mothers, brothers, sisters, uncles, or peers. They come from all backgrounds, genders, ages, ethnicities, and are not always organized criminals. Exploiters take advantage of youths' vulnerabilities and exploit their desire for love, acceptance, protection, security, and basic needs. They will attempt to maintain power and control through cycles of attention, threats, force, coercion, and violence. Although many victims may identify themselves as such, others do not.

- **Internet Abuse and Abusive Images of Children:** Any representation, by whatever platform, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for sexual purposes. It is also inclusive of cyberbullying through technology, including various forms of social media.
- **Neglect:** The failure to care for a child or perform a parental responsibility resulting from carelessness, indifference, or unwillingness. Neglect may be physical, medical, educational, and/or emotional. Neglect can include extended periods of isolation; withholding food; or the failure to provide adequate food, clothing, shelter, medical treatment, or supervision.
- **Organizational or Institutional Abuse:** The maltreatment of children from a system of power. Institutional abuse includes neglect, emotional, physical, and sexual abuse, and effects of programs working below acceptable service standards, or relying on harsh or unfair ways to modify behavior.
- **Physical Abuse:** The use of intentional physical force and infliction of nonaccidental trauma or injury; in some instances, an explanation may be provided for an injury that is inconsistent with how the injury likely occurred. Physical abuse can include actions such as punching, beating, kicking, biting, shaking, throwing, stabbing, choking, hitting, and burning.
- **Sexual Abuse:** The employment, use, persuasion, inducement, enticement, or coercion of any child to engage in, or assist any other person to engage in, any sexually explicit conduct or simulation of such conduct for the purpose of producing a visual depiction of such conduct. Sexual abuse may include fondling or groping a child's genitals, making a child touch an adult's sexual organs, penetration of any kind that does not have a valid and relevant medical purpose, incest, rape, statutory rape, sodomy, exposing a child to sexual intercourse, masturbating in front of a child, involving a child in prostitution or exploitation, involving a child in the production of any sexually explicit images, indecent exposure, and grooming.

- Grooming is a deliberate process by which offenders gradually initiate and maintain sexual relationships with victims in secrecy. Grooming allows offenders to slowly overcome natural boundaries long before sexual abuse occurs. On the surface, grooming a child can look like a close relationship between the offending adult, the targeted child and (potentially) the child's caregivers. The grooming process is often misleading because the offender may be well-known or highly regarded in the community. As a result, it can be easy to trust them.
- **Sexual Exploitation:** A form of sexual abuse that involves engaging children in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or the fulfillment of other needs. Sexual exploitation can involve a child being manipulated or coerced through grooming, which may include befriending children, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationships between victims and perpetrators involve an imbalance of power where the victim's options are limited. Sexual exploitation may coincide with sexual abuse and/or human trafficking.
- **Spiritual Abuse:** Spiritual abuse is a misuse of authority to promote the interests of the abuser rather than the best interests of the victim. It is a form of psychological and emotional abuse that takes place within a faith context and can occur in combination with other forms of abuse. This occurs when a spiritual leader or someone in a position of spiritual power or authority misuses biblical doctrine or their position of power to control, coerce, manipulate, or dominate an individual through their spiritual relationship. Spiritual abuse may include exploitation, pressure to accept Christ, censorship of decision-making, requirements for secrecy and silence, pressure to conform, misuse of scripture to control behavior, requirement of obedience to the abuse, and isolation from others. This type of abuse may negatively impact a person's spirituality, effectively diminishing or breaking their spirit.
- ***Best Interests of the Child:*** *This term pertains to the principles that are used to assess and determine each individual child's circumstances, needs, and wishes with that child's safety and well-being as the paramount concern.* Each determination of what constitutes a child's best interests is individualized and based on consideration of a number of factors, such as the child's age and developmental needs; the physical and emotional safety and welfare of the child; the child's need for stability, love, and maintenance of emotional connections; the child's wishes and long-term goals; and other relevant factors.
- ***Cultural Competence:*** *The ability of individuals and systems to respond respectfully and effectively to people of all cultures, classes, races, ethnic backgrounds, sexual orientations, and faiths or religions in a manner that recognizes and values the worth of individuals, families, tribes, and communities and protects and preserves the dignity of each.*

- **Mandated Reporter:** *Individuals that are required to report instances of suspected or disclosed abuse to the police or other appropriate authorities. **Note:** All KAI personnel and affiliates are mandated reporters.*
- **KAI Personnel:** *For purposes of this policy, unless otherwise indicated, references to “personnel” will include the following: employees, staff, missionaries, interns, and volunteers. **Note:** Visitors are addressed in Section 3.8: Visitors.*
- **Prevention:** *Activities that stop a negative action or behavior and promote a positive action or behavior. Successful child abuse prevention efforts must both reduce risk factors and promote protective factors. Protective factors are attributes or conditions in individuals, families, and communities that, when present, increase the health and well-being of children and families. These factors serve as buffers, helping parents who might otherwise be at risk of abusing their children, to find resources, supports, or coping strategies that allow them to parent effectively, even under stress. Prevention efforts can be classified as primary, secondary, or tertiary:*
  - **Primary prevention (also known as universal prevention or early prevention):** Programs, practices, and services designed to promote the general well-being of children and families by preventing maltreatment or abuse before it occurs. Examples of primary prevention activities include encouraging positive parenting; educating parents and caregivers on child development, age-appropriate expectations, and the roles and responsibilities of parenting; supporting and strengthening families’ abilities to access services and resources; and providing education on how and where to report suspected child abuse and neglect.
  - **Secondary prevention:** Programs designed to help identify families who are at high risk for abuse and provide services to them. As with primary prevention, secondary prevention programs, practices, or services are implemented for families who have not been identified to the child welfare system due to abuse or neglect. Programs, practices, or services in this category have been proven to be effective in preventing child abuse and neglect but may not necessarily be scalable to be universally available to a general population. Certain established risk factors for abuse or neglect are used to determine eligibility for these programs, practices, or services. Examples of secondary prevention efforts include specialized education programs for a focused at-risk population; home visiting programs; respite care for families that have children with special needs; and family resource centers that offer information and referral services.
  - **Tertiary prevention:** Interventions and services provided after abuse or neglect occurs, designed to mitigate or reduce the negative consequences of the abuse and to prevent the recurrence of abuse. These services may be provided while a child remains in the home if it is safe for him or her to do so or provided with the child having been removed from the home. Examples of these efforts include parent-

mentor programs; parent support groups that help parents transform harmful practices and beliefs into positive parenting behaviors and attitudes; mental health services for children and families to address trauma and improve family communication and functioning; and substance use treatment programs.

### **3.3 Staff Screening and Adherence to Requirements**

*Safeguarding expectations and responsibilities will be included in all job postings and discussed during interviews. All prospective personnel will provide references and submit to a background check and any additional country-specific legal requirements for pre-employment screening. Prior to starting work, all personnel will complete a mandatory orientation of this policy and sign an agreement indicating they are aware of, support, and will abide by its contents. In addition, any child of a personnel member who is living on a children's home campus, or who has access to children, must also complete a mandatory orientation of this policy and sign an agreement indicating they are aware of, support, and will abide by its contents when they attain the age of 18 and annually thereafter while residing on campus. Assessments of each staff member's adherence to this policy will be documented in all performance reviews and periodic evaluations that will be maintained in the personnel's human resources file.*

Kids Alive International will carry out a thorough background check on all individuals who are offered a position to serve with our organization. This process will include an interview, criminal background check(s), obtaining references, and other screening as necessary.

- NOTE: Some countries have legal requirements for specific screenings. The Country Director is responsible for ensuring these are properly identified and conducted.
- NOTE: If the country program encounters availability or accessibility issues with conducting any required check, the Country Director will discuss possible solutions with the Global Lead, Safeguarding.

With the support of in-country human resources staff, the Country Director and site director of each Kids Alive site must ensure that thorough background checks are conducted on all paid and volunteer local personnel who work at a Kids Alive program in any capacity.

The Kids Alive International application process is mandatory for all employees. Evidence of identity and the authenticity of qualifications must be checked. A minimum of three references must be received and follow-up with contacts must be made before hiring an applicant. Applicants are required to disclose any previous criminal convictions. Refusal to agree to a background check or evidence of prior disciplinary action, allegations, criminal charges, or convictions for child-related offenses may result in disqualification from employment or from becoming a volunteer with Kids Alive.

All personnel must be appropriately managed, supervised, and supported, and have a clear job description that includes the personnel member's safeguarding responsibilities. Each Kids Alive program must conduct safeguarding orientations and periodic evaluations of staff, missionaries, volunteers, and other personnel that work in the program and must respond immediately to any concerns regarding safeguarding and child protection issues. Documentation of orientation

completion, performance reviews, and periodic evaluations will be maintained in the personnel's human resources file.

### 3.5 Education and Training

*Training on this policy and safeguarding and child protection efforts will be provided to all personnel as part of their initial orientation and, at a minimum, on an annual basis thereafter. The children and families KAI works with will also be provided education and training on safeguarding, child protection, and this policy.*

Child abuse is preventable; it is not inevitable. Child abuse occurs within a framework of complex environmental interactions. Risks and protective factors associated with abuse are embedded in interactions within a wide range of relationships inside and outside of the family. To thrive, children and families need access to educational programs, community resources, and tangible support. Therefore, Kids Alive's programs and services will target these needs and work to strengthen the relationships between children and their caregivers. All personnel are expected to always exhibit good practice consistent with appropriate education and training.

Appropriate education and training is inclusive of understanding what constitutes abuse, abuse indicators, safeguarding measures, the role of personnel in abuse prevention, procedures to respond to alleged abuse, roles and responsibilities regarding safeguarding measures, how to communicate and interact with children and vulnerable adults, child grievance procedures, trauma-responsive care, and cultural competence. KAI's values will be integrated throughout education and training efforts.

All children and their families should be made aware of what child abuse is, how to mitigate the possibility of being abused, and how to respond if abuse occurs. There should be regular opportunities to educate children, parents, and caregivers on:

- The concept of touches that are safe and not safe
- Clear procedures on who would be a safe person to talk to if they are abused, know of others that are being abused, or who to talk to if they feel uncomfortable around another person
- How to express any grievances or concerns
- Age-appropriate, comprehensive sex education incorporating Christian values and cultural sensitivity— Guidelines for sex education programs include:
  - Children should be taught the appropriate names for body parts. This is important, because it will help them more clearly disclose what has happened to them in instances of inappropriate or abusive interactions. Children should be empowered with knowledge about their bodies and consent, as an effort to protect themselves.
  - Comprehensive sex education is essential to empowering children and adolescents with knowledge concerning human development, relationships, personal skills, sexual behavior, sexual health, and society and culture. Children and adolescents need honest, accurate, and affirming knowledge about sexuality to combat negative or inaccurate sexual messages. Sexual education is important

because it provides information and skills that are necessary to make healthy decisions in relationships.

A series of resources (worksheets, games, videos, stories, etc.), preferably in the individual's first language, should be used to aid teaching sessions. These education programs should also include any children of personnel that live on a children's home campus or attend a Kids Alive program or site.

### **3.6 Safeguarding Officers**

*Each Kids Alive country program will appoint at least one Safeguarding Officer to support the implementation and monitoring of this Safeguarding Policy. Safeguarding officers are also responsible for reviewing related procedures and practices; conducting audits and risk assessments; assisting with training; participating in responding to concerns, inquiries, and investigations; and taking action to mitigate or eliminate any identified safeguarding risks. Anyone may contact a safeguarding officer to share safeguarding concerns.*

Each safeguarding officer will work closely with the Country Director and leadership team of their assigned program country on the implementation and monitoring of this Safeguarding Policy. Safeguarding officers will regularly interact with the Global Support team in the U.S. and regional offices to include receiving additional training and technical support, guidance and input on audits and risk assessments, reporting safeguarding concerns, and investigating and responding to allegations of abuse.

It is recommended that each program site designate someone as having primary responsibility regarding safeguarding concerns and that this person will be in regular contact with the country's Safeguarding Officer.

### **3.7 Interaction Between Children and Adults**

*All Kids Alive personnel must treat each child, adolescent, and vulnerable adult with dignity and respect, regardless of differences of ethnicity, religion, age, ability, gender, sexual diversity, class, and economic circumstances. Personnel will not commit or participate in any type of abuse or neglect or commit any act in violation of this policy or national and international laws on the rights of the child, either during work hours or during their personal time. Personnel will make every effort to mitigate the possibility of a concerning situation, ensuring use of appropriate physical contact with children, establishing appropriate boundaries with children, and reporting concerns of any potentially inappropriate contact with children. Communication between children or vulnerable adults and donors will occur in compliance with parameters established by the Global Support team.*

Healthy interactions help to create healthy environments where people, including children who have endured trauma, can feel psychologically safe and develop healthy relationships and connections. Psychological safety is a climate characterized by interpersonal trust and mutual respect where people can feel empowered and comfortable to be themselves, share freely, and not fear punitive retribution for an honest mistake. This sort of climate is necessary not only for

children and young adults to disclose, process, and heal from trauma, but also for a healthy work environment and culture. There are several ways to help create environments of psychological safety, including:

- Adhere to KAI's values of faith, integrity, understanding, self-control, perseverance, devotion to God, mutual kindness, and love.
- Implement trauma informed and responsive practices, such as those focused on de-escalation techniques, and operate from a trauma-informed perspective.
- Approach conflict resolution consistent with KAI values with a lens on sharing power as a collaborator, not an adversary. Refrain from using accusatory language and instead ask questions such as "How can WE..." instead of "How can YOU..."
- Develop connections by expressing mutual kindness and respectfully speaking human-to-human. Anticipate emotion-filled reactions, especially during times of conflict or stress, and maintain self-control when responding. Adopt a learning mindset and express curiosity to hear and understand another person's point of view.
- Ask for and be willing to accept feedback. This can help illuminate your blind spots and internal biases. There is no better way to demonstrate the KAI value of understanding than listening to a child, learning from that child, and showing care by responding.
- Healthy interactions also support the concept Justice that Heals, Bonds that Mend. This concept is inclusive of nurturing transformational relationships, a positive relationship between a child and committed adult that helps children see that they matter, imagine a different future, gain agency and experience self-confidence, and develop an improved capacity to self-regulate. These relationships, built on trust, support and optimize healthy brain chemistry by showing compassion, being proactive, thinking holistically, creating an environment that feels safe for a child, and listening to a child. These steps are critical components of building Bonds that Mend in the pursuit of restoration and healing through Kids Alive's holistic model of care. All Kids Alive personnel should be modeling healthy interactions; especially those personnel who have regular and ongoing interaction with children in Kids Alive programs can be those trusted and committed adults who:
  - Listen without judging. This involves youth being truly heard, adults paying attention and listening to understand instead of listening to respond, and adults not passing judgment on a child as good or bad but looking for the person beyond the behaviors, case, or circumstances. Doing this helps empower a child by giving his or her voice a place to be heard.
  - Are persistent and "real". Relationship-building is not a linear process and personnel must be resilient and persevere in building that relationship through sometimes very significant ups and downs. Integrity in relationships is when we are transparent and honest and that sometimes requires personnel to express vulnerability or to share similar experiences and find common ground to build connections so the youth can see them as a whole person and be reassured that the adult understands, or is attempting to understand, the world from which the youth comes.
  - Challenge the youth. Challenging youth does not mean that an adult embarrasses them (especially in front of others) or harps on them for their mistakes; rather, it means that the adult is pushing a child in a way that encourages the child to reflect

and grow. Being active and proactive in a child's life helps an adult to build a relationship with a child and remain aware of what's going on with the child – physiologically, emotionally, and spiritually. This type of relationship and awareness helps a youth understand that when the trusted adult is respectfully challenging the youth, the adult is coming from a place of care and not judgment.

- Nurture a young person by showing up in crises and expressing care, concern, and love. Young people who have never had someone show up for them can find it difficult to trust or operate in healthy ways. They sometimes exhibit their feelings through negative behaviors, appearing to be unruly or unmanageable and may feel unworthy of time, love, and consideration. Showing up for them, especially when it is not expected, to stand by them when they're in trouble and acknowledging that setbacks and mistakes are part of the learning process, helps to establish trust in a relationship and can help the youth distinguish moments of failure from being a failure and use those lessons to grow.

Kids Alive recognizes that healthy interactions and physical contact, psychological safety, and nurturing, trust-based, transformational relationships are important aspects of a child's development and healing. Children need to feel safe, loved, and empowered to begin to develop the Bonds that Mend which will support them in their journey of restoration. In creating these interactions and supportive environments, it is important to establish boundaries that protect children and vulnerable adults from abuse and potentially abusive interactions, as well as to avoid any appearance of impropriety.

Children should be aware that they have agency to establish their own boundaries, and adults should encourage and respect those boundaries. It is important to understand that not every child's needs are the same. Children should be supported in understanding their needs to establish those healthy boundaries because crossing those boundaries may cause triggers for children, especially if they have not healed from their trauma.

There is value to understanding and recognizing that some interactions between children and adults may be appropriate in some instances, but they may not be appropriate in KAI's ministry. These behavioral expectations of KAI personnel help us model and support healthy interactions and boundaries:

**Expected/Acceptable Behaviors:**

- Respecting each child's rights, background, culture, and beliefs, as set out in the UN Convention on the Rights of the Child.
- Protecting children and vulnerable adults from all forms of physical or mental violence, injury or abuse, neglect, maltreatment, and exploitation.
- Listening to, respecting, and treating children, adolescents and vulnerable adults without prejudice or discrimination at all times.
- Respecting a child's decisions and wishes, including those related to their medical care.
- Setting clear boundaries for appropriate behavior between self, participants in KAI programs, and other KAI personnel and their families. This includes being culturally aware and sensitive and understanding and respecting a particular individual's boundaries.

- Taking responsibility for the use of technology and making sure that it is used in a manner that is responsible, safe, and legal. **Note:** Additional information can be found in Section 3.10: Digital Safeguarding and Internet Use by Children.
- Creating, capturing, generating, storing, or distributing any form of media of children and vulnerable adults in accordance with this policy and any additional guidelines that are provided. **Note:** Additional information can be found in Section 3.9: Organizational Communications.
- Intervening when there is evidence of abuse and/or reasonable cause to suspect that an individual associated with KAI or an individual in a KAI program is abusing another person by reporting the incident in accordance with this policy and local law. **Note:** Additional information on internal reporting is outlined in Section 3.11: Reporting Safeguarding Concerns or Policy Violations.
- Responding quickly, fairly, and transparently to any complaints made by an individual participating in a Kids Alive program or related to a Kids Alive program participant.
- Ensuring that whenever possible, there is more than one adult present during activities with children, adolescents, or vulnerable adults in KAI programs and facilities. If this is not possible, then activities with children and adolescents should take place within the sight and/or hearing of other adults. If this is not possible, other efforts to mitigate concerns should be implemented and a report should be made to the immediate supervisor.
- Adhering to privacy and confidentiality rules as outlined by this policy.
- Communicating with Kids Alive program participants in an age-appropriate and respectful manner that is consistent with this policy. Digital communications with children, adolescents, or vulnerable adults that include a parent or guardian where appropriate and are conducted in a transparent manner with the knowledge and approval of KAI.
- Challenging unacceptable behavior toward a Kids Alive program participant and reporting all allegations and suspicions of abuse.
- Building balanced relationships based on mutual trust which empowers children and vulnerable adults to share in the decision-making process.

#### **Unacceptable Behaviors:**

- Using tobacco products or possessing or being under the influence of alcohol or illegal drugs at any time while working with participants in a KAI program.
- Directly communicating (emails, texts, chats) with individual children, adolescents, or vulnerable adults without the knowledge and approval of KAI and the parent/guardian where appropriate.
- Exaggerating or trivializing abuse issues.
- Subjecting KAI program participants to any form of corporal punishment, social isolation, sexual suggestion, offense, misconduct, or other types of abuse. Immobilization of a child for any reason other than for as brief a time as possible to protect the child from inflicting harm upon themselves or others.
- Communicating with children, adolescents, or vulnerable adults in a way that humiliates, shames, frightens, or distresses them; using language that could be abusive, offensive, or inappropriate.

- Doing things of a personal nature that a child or vulnerable adult can do for themselves, such as toileting or changing clothes.
- Developing relationships with children, adolescents, or vulnerable adults that could be seen as grooming or favoritism, such as the offering of gifts, special treatment, use of effusive language, actions that minimize the relationship with biological family or encouraging secrecy.
- Taking pictures or other images of children in violation of this policy. **Note:** Additional information can be found in Section 3.9: Organizational Communications.
- Having inappropriate physical contact with a child, which may include:
  - Demanding hugs and kisses or holding, kissing, cuddling, or touching children in an inappropriate or culturally insensitive way or forcing a child to engage in contact that may cause discomfort or otherwise be a trigger for the child
  - Touching a child's chest, genital areas, upper legs, buttocks, waist, or stomach area
  - Sitting a child in the center of an adult's lap or allowing an older child to sit on an adult's lap. **Note:** KAI personnel in direct caregiving roles may be granted approval for some lap sitting based on therapeutic necessity as assessed by the multidisciplinary team or child's therapeutic provider(s) and approved by the Residential Director.
  - Seductive or suggestive contact
  - Unwanted physical contact of any kind which is done primarily for the pleasure or satisfaction of caregivers or adults
  - Any touching used to express power or control over a child (excluding approved holds and restraints that are used by staff to prevent a child from hurting themselves or others during a time of crisis)
- Making inappropriate promises to children, adolescents, or vulnerable adults.
- Dating, conducting a sexual relationship, or engaging in any form of sexual contact with program participants, including children, adolescents, and vulnerable adults.
- Making hurtful, insensitive, derogatory, or sexually suggestive comments or gestures to or in front of children, adolescents, and vulnerable adults.
- Adults sharing a personal room with a child, adolescent, or vulnerable adult.
- Allowing children, adolescents, or vulnerable adults to visit or stay with you at your residence without parent/guardian approval where appropriate and the written approval of the Site Director. While potentially beneficial, spending any time outside specified program hours with a child, adolescent, or vulnerable adult program participant has inherent risks for KAI personnel and the program participant; therefore, KAI personnel shall abide by the expected behaviors outlined in this policy document and conduct all interactions with full transparency.

This list of behaviors is not exhaustive. Therefore, KAI personnel should conduct themselves in a manner that promotes the safety of children and adults alike.

It is the adult's responsibility to gently and positively correct a child if the child crosses healthy physical, verbal, or emotional boundaries. However, it should be understood that children from

abusive situations or households may have never been exposed to adults who modeled healthy and positive interactions and relationships. KAI personnel are expected to be positive role models to children and adolescents and model healthy boundaries and relationships as described above. Kids Alive personnel should take advantage of teachable moments to help children improve their understanding of healthy boundaries and relationships as opposed to punishing or shaming them for exhibiting unhealthy behaviors, boundaries, or relationships.

### 3.8 Visitors

*Visitors are individuals who are not considered KAI personnel. Visitors must abide by this policy as well as additional country and site-specific requirements. Visitors must respect and maintain confidentiality and privacy guidelines for the safety of the children and vulnerable adults in KAI programs. All interactions between visitors and children must occur on fully visible common spaces on KAI grounds and be supervised by at least one Kids Alive staff member at all times; visitors are not to be taken to the homes of children or adult beneficiaries in KAI programs. Personnel will be responsible for ensuring that the children are protected from any inappropriate activity. Accommodation is not provided to visitors on KAI campuses or sites where children in KAI programs are housed. Each country should have site-specific rules and procedures posted in visible and appropriate locations to ensure that all interactions between visitors and children are appropriately managed and supervised and that opportunity for unauthorized contact does not exist.*

Visitors may include “Go Team” (previously known as service team) members, family members or friends of personnel, donors, alumni, or others external to or not employed by Kids Alive. Visitors may be a part of a group or an individual and may be a one-time visitor or desire to visit for an extended period or multiple times. For purposes of this policy, visitors do not include family members of program participants; however, appropriate protocols for family visitation and related activities should be established by each country.

If the goal of the visitor is to attend a training or meeting with KAI personnel or other professionals that will not include participating in program activities, the visitor shall, at minimum, be accompanied and supervised by KAI personnel at all times, and follow the guidance in Section 3.7, Interactions Between Adults and Children, and Section 3.8 Organizational Communications of this policy.

Unannounced visitors to non-residential program sites that drop in to learn about the ministry, make donations or other inquiries shall, at minimum, be accompanied and supervised by KAI personnel at all times, follow the guidance in Section 3.7, Interactions Between Adults and Children, and Section 3.8 Organizational Communications of this policy. Any unannounced visitor to a residential program site with the goal of interacting with program participants shall be redirected and the visit postponed until an appropriate vetting process can be realized.

All interactions between a child and visitor must be supervised and, if in person, must occur on a Kids Alive International campus or in a setting and with supervision that has been approved by the Country Director or his or her designee, the Site Director, and the country’s Safeguarding

Officer. Structured program activities open to the community may be appropriate at some KAI sites. All such activities require careful planning and preparation. Site leadership in consultation with the in-country Safeguarding Officer will ensure that appropriate supervision by KAI personnel and/or vetted and trained volunteers is provided for all program participants throughout the entirety of the event and until all visitors attending the event have departed the site.

**Go Teams (previously known as Service Teams) and Vision Trips:** All Go Team and vision trip members will be made aware of Kids Alive International's safeguarding policies as part of their orientation and will sign an agreement that they will abide by the contents of this policy, international and local laws. Criminal background checks will be carried out on all Go Team and vision trip participants. Go Team and vision trip participants are not permitted to stay on a Kids Alive property or a campus where there are children present. KAI sites where suitable off-campus housing options are prohibitive may utilize the waiver process for existing, on-campus housing for teams. The site must control ingress to campus and demonstrate the ability to maintain compliance with the safeguarding policy throughout the duration of the team's stay.

**Family Members and Friends of Personnel:** If family members or friends of personnel would like to visit a site and/or help with any program activities they must follow a vetting process (similar to that for Go Team members - including a criminal background check and signing and adhering to the safeguarding policy agreement) and have the approval of the Site Director and Country Director. An identical vetting process is required for family or friends of a Site Director except approval is required from the Country Director. Visiting family or friends of a Country Director must follow the previously described vetting process and have approval from the corresponding Regional Vice President. If approved, the staff member will remain responsible for providing appropriate supervision throughout the duration of the visit. Family members and friends are not permitted to stay on a Kids Alive property or a campus where there are children present. Personnel residing full-time on a KAI site may utilize the waiver process for overnight stays of family members in their current, on-campus residence. The staff member remains responsible for supervision of their visiting family and for maintaining compliance with the safeguarding policy throughout the duration of the family member's stay.

**Donors:** Unless otherwise a part of a Go Team or vision trip, donors may not visit a KAI site or a child they financially support. All interactions between children and international donors must occur through the Global Support Team. All interactions between children and national donors must occur through the Country Director and the Safeguarding Officer.

**Contractors and Third-Party Providers:** Contractors and third-party providers need to be closely supervised at all times while on campus or when they otherwise may have access to or contact with program participants. Depending upon the frequency, duration, and type of interaction and access they may have while on KAI property, contractors and third-party providers, including those who will have regular interaction with children and personnel, may need to be further vetted or agree to additional safeguarding parameters which may be included in a formal contract. Those contractors and third-party providers that will have regular interaction with

children and personnel may operate more similarly to KAI personnel rather than visitors under this policy. These determinations will need to be made for each contractor or provider.

**Approved Program Consultants:** If individuals spend time on site as consultants or subject matter experts and their time on campus is structured and limited by completion of a training or assistance goal, then a vetting process (similar to that for Go Team members – including a criminal background check and signing and adhering to the Safeguarding Policy agreement) is mandatory.

The intended outcomes for each consultant's visit should be determined beforehand, with the terms of reference or goals in writing. Their assignment must have the approval of the Site Director and Country Director.

**Program Volunteers:** A program volunteer is a visitor who provides assistance to programs for events, activities or other needs. Volunteers often provide this assistance on a regular, ongoing basis but are not required to do so.

If the goal of the visitor is to help with any program activities for a short time (i.e. assist with program activities for less than ten hours/week), then they must follow a vetting process that includes a criminal background check and signing and adhering to an agreement to the Safeguarding Policy. These visitors must also have the written approval of the Site Director. Additionally, they will not be permitted to stay on a Kids Alive property or campus where there are children present.

If a volunteer is planning to help the program on an ongoing basis for quarter time or more (for example, 10 hours/week or more, or one week/month or more), and/or is approved to stay on campus, then a vetting and agreement process, such as that which is carried out with personnel, is mandatory. A written agreement regarding the volunteer's duties, boundaries, and supervision must be written, agreed, and signed by the Site Director and Country Director. Once approved, a volunteer may serve for a period of up to a year, at which time they will need to reapply. Volunteers will be supervised and supported in their work to ensure that they are in good standing with the program they are working with and that their work and conduct is in line with the Safeguarding Policy and other relevant laws and regulations.

Longer-term volunteers must also go through the KAI orientation through the Global Support Team in the U.S. office as well as receive appropriate cross-cultural preparation, similar to the process undertaken by full-time missionaries, if the volunteer is from outside of the country in which they are planning to volunteer. This cross-cultural preparation is designed to promote cultural competence. Longer-term volunteers, volunteers who serve over a year, must receive supervision and support in their work, and receive periodic evaluations of their performance to ensure that they are in good standing with the program they are working with and that their work and conduct is in line with the Safeguarding Policy and other relevant laws and regulations.

Visitors and volunteers from Europe will be vetted by the Kids Alive International UK office. The Global Lead, Safeguarding will be kept apprised of any potential visitors or volunteers from Europe. Visitors and volunteers from the United States and Canada will be vetted by the Global Support Team in the U.S. Office. Local and national visitors and volunteers will be vetted by the local KAI office in that country. Vetting of visitors or volunteers not fitting the above descriptions should be directed to the Global Lead Safeguarding to determine an appropriate procedure.

Any concerns related to a visitor or non-employee, especially regarding safeguarding or policy violations, should be reported consistent with the reporting procedures in Section 3.11: Reporting Safeguarding Concerns or Policy Violations.

### 3.9 Organizational Communications

*KAI has a responsibility to the children and families we serve to ensure their right to privacy is respected and upheld, they are treated with dignity, and no publication, photograph, video, or other media or communication jeopardizes their safety or otherwise puts them at further risk. Identifiable pictures or images of children in protective custody (i.e. removed from their parents' custody) will not be utilized in KAI's communications or media. Identifiable pictures or images of children involved with KAI programs who are in the custody of their parents may be taken and used as long as the child's parent or legal guardian has provided written permission and consent to KAI. Adult beneficiaries may provide written consent for themselves. All written permission and consent forms will be kept on file by KAI country offices. Visitors, including Go Team or vision trip members, and foster families may not take pictures of children or vulnerable adults in KAI programs unless specifically authorized in advance in writing to do so. Even when written permission is obtained, KAI will ensure its internal and external communications prioritize the child and family's right to safety, privacy, and dignity.*

Children who have been abused or neglected tend to have more risk factors and vulnerability for future harm from people they know and those they don't know. Therefore, it is extremely important to protect children from would-be abusers by minimizing the information that is shared about them. Informed consent can help ensure these and additional considerations are taken into account prior to any media pertaining to a child being used. **Kids Alive will obtain assent and appropriately file written consent from the child and their legal guardian before their information is shared and before they are photographed, videoed, or represented in any other form of media.** For any depiction where a child is identifiable (either by picture or description), permission and consent must be obtained before media is used for marketing or fundraising materials, newsletters, videos, online reports, and other means of publicity.

Guidelines for obtaining informed consent and assent:

- Informed consent results in a decision about a person's permission by a person that is legally capable to do so; informed assent results in a decision about a person's willingness to provide consent by a person that does not hold legal capacity to provide consent.
- Obtaining informed consent and assent involves a process of communication whereby parents, legal guardians, and beneficiaries are provided information and have the

opportunity to ask questions about the effect of providing consent and assent so they can make a well-informed decision about whether to do so.

- Parents, legal guardians, and adult beneficiaries will be provided written information, in a language they understand, pertaining to informed consent and assent.
- The written information will be accompanied by oral communication by a KAI staff member to further explain how KAI may utilize photographs, images, or information about a child or family. KAI staff will answer any questions a parent or legal guardian has relating to informed consent and assent and allow parents and legal guardians sufficient time to consider whether to provide consent and assent.

Guidelines for obtaining and sharing media containing children in KAI programs and their stories or histories include:

- **Identifiable Images of Program Participants:** Media should not show a child's face or identifying features; "artistic pictures" are generally preferred to maintain confidentiality and privacy. However, if media that shows a child's face is intended to be shared, the child and their parent or legal guardian must provide their written consent in advance. If consent has not been attained, images where the face is not visible at all should be used. If this is not possible, less than 50% of the face should be visible, with the nose being considered the vertical division of the face. Below the eyes should be considered the horizontal division of the face. If an individual has a distinctive hairstyle or body feature that is included, then the image should not be used. No full profile pictures should be used. In certain circumstances, faces can be blurred to ensure subjects cannot be identified, although this should be avoided when possible.
- **Appropriate Visual Content:** Media portraying children should not show them in a state of undress, in inappropriate poses or in articles of clothing depicting offensive words and/or images.
- **Location:** Identifying details and images that reveal a child's location should be treated with extreme sensitivity. Knowing that predators will take advantage of such information, this is especially important for children in residential care.
- **Use of Child Names in Communications:** KAI will continue to use pseudonyms for stories of children in residential care programs. Pseudonyms should also be used at the request of anyone featured in KAI organizational communications. First names of children in non-residential care programs can be used in KAI communications once assent and appropriate consent is obtained. The consent form for each individual will be kept on file in-country. Last names/surnames/family names should not be used in KAI communications.
- **Use of historical images:** It can be difficult to discern whether historical images comply with this policy, especially around written consent and not knowing whether the child is/was in a residential or non-residential program. Before an image is featured in KAI communications, KAI personnel shall make best efforts to comply with this policy, prioritize the individual's privacy, and not use an image where it is obvious that the child is or was in protective custody/in one of KAI's residential programs.
- **Use of images of 'sponsored' children in residential programs:** KAI is no longer promoting sponsorship of children in residential programs. Yet, there are individuals in

our residential programs that maintain sponsors. The use of recognizable images of these children in one-to-one communications with the sponsor, such as Milestones reports, is permitted but not in public contexts, such as the website, social media or broader marketing materials. When an identifiable image of a child in residential care is used to communicate with a sponsor, a privacy statement must accompany the image. For example, "For privacy reasons, please do not share any image or information about your sponsored child on the internet, including social media and Facebook."

- **Use of images of children and adults who are not in KAI programs:** There may be instances where we need to show images of children and adults who are not in our care.
  - Images of public gatherings, events, or street scenes can be used without written consent from identifiable individuals. However, care should be exercised if the subject and/or location are identifiable.
  - Images should not be used if the subjects are clearly in distress.
  - Images featuring one or a few identifiable individuals rather than a larger group require either written consent or video-recorded verbal consent. This may not always be possible depending on the context, in which case due care and sensitivity needs to be applied.
  - Stock photos/library images may be used as long as the originator can verify that the subject has given permission for their image to be used and the image is aligned with this policy.
- **On-site Photography:** Employees of KAI and affiliates are permitted to take photos and/or videos of children, families, and colleagues with assent from the subject.
  - Non-employees will not take photos of children in KAI programs while on campus. Non-employees are not permitted to take photos or videos on a residential campus unless they are designated as the team photographer and have written authorization obtained in advance.
  - All photos and videos featuring Kids Alive programs for use by external organizations or churches must be approved by a KAI employee to ensure alignment with the KAI Safeguarding policy. Visiting Teams can designate up to one person to act as the team photographer for the group to capture images while on KAI campuses where children are housed. This person must be an adult (18 yrs or older) that understands and accepts their role and responsibilities as a photographer.
  - A KAI employee knowledgeable on the requirements of the safeguarding policy will meet daily with the team photographer to review and approve the photos/videos captured. These approved images can be shared with the group and can be shared consistent with KAI Media and Communications guidelines. If a team does not have a designated team photographer, a KAI employee will capture photos and/or video consistent with the requirements of the safeguarding policy to provide to the group.
- **Special cases:** In rare instances, a child's whereabouts are held in secret. Such cases may involve a child being trafficked, the child's safety being in jeopardy, or an investigation by a special police unit. These cases can result in the necessity of using extra precautions

around privacy, particularly regarding a child's history or location. In these instances, the country will designate an appropriate individual to ensure adequate measures are taken.

- If photographers, journalists, translators, etc. are employed to obtain media of KAI children, they should be properly vetted and must pass a background check.
- Images should only be used for the intended purpose that was initially agreed upon in writing.
- Pictures and media should constitute a diverse representation of personnel and program participants.

Kids Alive International recognizes that it is important that children and adolescents have photographs and videos representing their achievements and documentation of the happy memories that they make. However, sharing images and histories may pose serious risk and danger to those who have experienced abuse and trauma. Additionally, families may also have religious or cultural reasons for not wanting to be photographed. It is important to consider the risks associated with creating, capturing, generating, storing, and distributing images of children, adolescents and vulnerable adults for Kids Alive International's use and to be respectful of the wishes of children and their families.

### **3.10 Digital Safeguarding and Internet Use by Children**

*Each program country will develop clear policies and procedures for internet use that are relevant to the context of its individual programs and that have the safeguarding and protection of children as paramount importance. These policies and procedures, at a minimum, will align with the following:*

- *Use of the internet will be closely supervised and monitored by trained Kids Alive personnel. This function should be included as part of the designated personnel's job description.*
- *Computers that have access to the internet will be in rooms which allow for frequent and easy access by staff and where the screens are clearly visible.*
- *Appropriate restrictions on times when the internet can be used.*
- *Kids Alive personnel must not access pornography or other inappropriate content on the internet.*
- *Kids Alive International reserves the right to confiscate and fully investigate online activity engaged in on KAI property and in KAI programs. Internet users are expected to utilize resources safely and responsibly as to not abuse, harass, or embarrass themselves and others.*
- *Appropriate filters and firewalls should be used to control and prevent the download of inappropriate content.*
- *Children will be advised on an ongoing basis about the risks of internet use. These include people using false identities, cyber-bullying, false or harmful spiritual ideas, viruses, pornography and other inappropriate and damaging content, sharing personal information, appropriate email protocol, and downloading pictures and other files.*
- *Donors, visitors, and Go Team members are not permitted to connect directly with children affiliated with KAI programs through mobile phones, email, social networking*

sites, or other electronic or non-electronic means; nor are children allowed to connect directly with donors, visitors, or Go Team members. Children should be instructed on what to do if they are contacted by one of those parties. Donors, visitors, and Go Team members should not respond to direct communication from a child affiliated with KAI programs and should inform the KAI U.S. office upon receipt of a direct communication from a child. All correspondence to and from children and donors should be sent via the KAI U.S. office.

Kids Alive is committed to ensuring that children are taught about the benefits and dangers of the internet and how to use it safely. The growing influence and popularity of social media has created many new opportunities for tracking, identifying, and abusing children both on and offline. There are many risks associated with children's internet use, including:

**Content:** Children can be exposed to violent and hateful content, pornographic and sexual images and videos, bias, racism, and misleading information.

**Contact:** Contact with others online may create an environment where children are bullied, harassed, or stalked. There is also the opportunity for grooming and the formation of abusive relationships.

**Conduct:** Children and adolescents might become involved in illegal downloading of materials, hacking, and financial scams. Online forums also present the opportunity for children to harass or bully other children. They could create and upload inappropriate and compromising materials of themselves and provide misleading information and advice to others.

Site-specific policies and procedures will ensure children and adults alike understand how to mitigate against the risks associated with internet use and utilize safe internet practices.

### **3.11 Reporting Safeguarding Concerns or Policy Violations**

*Just as this policy is key to reaching our goal of children experiencing physical and emotional wellbeing, reporting concerns and violations is a critical part of our KAI value of Integrity. We are to be transparent, honest and accountable in our relationships, stewardship, and results. That includes being transparent, honest and accountable in our relationships with children and vulnerable adults. All Kids Alive personnel and affiliates are responsible and obligated to report any suspicions of abuse, safeguarding concerns, and any violations of Kids Alive's Safeguarding Policy within 24 hours of becoming aware of them. Any allegations or concerns of abuse should be reported via the Safety Reporting Process (found in Appendix A) or directly to any of the following: the country's Safeguarding Officer(s), the Country Director (CD), the Regional Vice President (RVP), or the Global Lead, Safeguarding. Any of these individuals will ensure that the other necessary individuals are notified within 12 hours, unless one of those is the subject of a report. A reporting form (found in Appendix B) is available to use for compiling and submitting a*

*report. Upon receipt of a report, the relevant individuals will determine and implement appropriate action.*

*Kids Alive personnel and affiliates reporting safeguarding concerns or policy violations should not and will not avoid reporting on the basis that it may cause harm to the reputation of Kids Alive International. Good faith reports will not negatively impact the reporter and the reporter will not be responsible for investigating the report or determining any potential violations or corrective actions.*

***If a child or vulnerable adult makes a disclosure to you:***

- *Listen carefully to what they are saying but do not ask too many questions*
- *Let them know they have done the right thing by telling you*
- *Tell them it is not their fault*
- *Say that you will take them seriously*
- *Do not confront the alleged abuser*
- *Explain what you will do next*
- *Report what the child has told you as soon as possible*

*Any allegation or concern of abuse must be treated seriously and addressed in a fair, impartial, thorough, thoughtful, and prompt manner in compliance with applicable laws. All responses to such reports or concerns will prioritize the individual's physical and psychological safety, well-being, and best interests.*

Kids Alive personnel and affiliates should never assume that a concern or incident has already been reported. Receiving multiple reports detailing the same concern is preferable to under-reporting. Kids Alive personnel and affiliates are not required to consult a supervisor before reporting safeguarding concerns. Supervisors should regularly reinforce the expectations of reporting and ensure personnel are aware that they do not have to adhere to a hierarchical line of reporting to express their concerns.

Appropriate action will be determined and implemented by the Country's Safeguarding Officer and Director in consultation with the Regional Vice President and Global Lead, Safeguarding. (The Global Lead, Safeguarding oversees the implementation and ongoing monitoring of this policy, responses to reports of allegations or concerns of abuse, and acts as the main point of contact for all child protection and safeguarding concerns for Kids Alive.) Appropriate action may include referring to appropriate authorities for a criminal or civil investigation and/or potential severance of the relationship with Kids Alive.

The following procedure establishes a plan to promptly and effectively address allegations and concerns of abuse or neglect and violations of law or Kids Alive policies.

**Procedure for Reporting and Responding to Concerns**

1. Allegation of Concern is Made
  - a. Any allegations or concerns of abuse should be reported as directed in the Safety Reporting Process (found in Appendix A) or by using the form found in Appendix B of the Safeguarding Policy. Reports should be made immediately (within 24 hours)

upon disclosure or suspicion of abuse. If using the reporting form, fill it out in detail, submit it to the Country's Safeguarding Officer, the Country Director, Regional Vice President, the Global Lead, Safeguarding, or [report@kidsalive.org](mailto:report@kidsalive.org).

- b. The mandated reporting requirement is fulfilled when the allegation has been submitted via the Safety Reporting Process or directly to at least one of the above listed individuals.
- c. Within 12 hours of receipt, the person to whom the report was submitted will ensure the other recipients have also received it and will begin to conduct an initial assessment or designate someone to do so.

## 2. Initial Assessment

- a. Upon receipt of a complaint, steps will be taken to ensure the immediate safety of the child(ren) or vulnerable adult(s) involved.
- b. Additional information, clarifications, and potential violations may need to be gathered and identified to determine the initial response, such as whether a full investigation will be necessary.
- c. As part of this process, the Country's Safeguarding Officer and Country Director, in consultation with the Regional Vice President and Global Lead, Safeguarding, will identify the necessary individuals who may need to be part of an investigation team.
- d. A determination will be made as to the initial response procedures and steps needed to obtain additional information.

## 3. Response Determination

- a. An incident response plan to respond to the incident will be developed by the Country Safeguarding Officer and Country Director, in consultation with the Regional Vice President and the Global Lead, Safeguarding, and implemented immediately. The plan will:
  - i. Identify the members of the investigation team and outline their roles and responsibilities.
  - ii. Include a timeline for meetings to assess progress and provide support.
  - iii. Require the submission of written progress reports and a final report.
  - iv. Comply with the goal of investigation and final report completion no more than 30 days from receipt of the allegation.
- b. Should an allegation be made against a Country's Safeguarding Officer, Country Director, Regional Vice President, the President, or Board Member, the Global Lead, Safeguarding will, in consultation with the Chief Operating Officer, appoint someone to oversee the investigation.
- c. Should an allegation be made against the Global Lead, Safeguarding or the Director of Global Programming, the Chief Operating Officer, in consultation with the President will appoint someone to oversee the investigation.
- d. Should an allegation be made against the Chief Operating Officer, the Global Lead, Safeguarding, in consultation with the Global Programming Director and the President, will oversee the investigation or appoint someone else to do so.

## 4. Investigations and Case Escalations

- a. The identified investigation team will conduct an internal review, including reviewing all available and relevant documentation and interviewing the individuals involved, including potential witnesses.
  - b. Investigations should be conducted in a way that:
    - i. Recognize the complex circumstances and varied contexts in which we work amongst ourselves and with others to safeguard children
    - ii. Prioritize safety, children's rights and well-being, the child's wishes and best interests, critical thinking, and integrity
    - iii. Seek to understand practice from the viewpoint of the individuals and organizations involved at the time rather than using hindsight
    - iv. Are thorough and transparent about the way information is collected and analyzed
    - v. Make use of relevant research and case evidence to inform the findings
    - vi. Maintain the confidentiality of the complaining party and all individuals involved as much as possible within the confines of the investigative process
    - vii. Promote learning from mistakes to understand and prevent adverse events
  - c. Those involved in an investigation will escalate any concerns internally, as needed, including those related to Human Resources (HR).
  - d. The investigation team will ensure that all appropriate external reports are made, including those to law enforcement, child protection, or licensing or oversight authorities.
5. Case Outcomes
- a. The investigative team evaluates all the information and determines a formal recommendation to be given to the Country's Safeguarding Officer and Country Director, Chief Human Resources Officer, Regional Vice President, Global Lead, Safeguarding for any employment actions that are warranted based on the investigative report. If an allegation is substantiated, appropriate action, up to and including dismissal and legal action will be identified and implemented immediately.
  - b. After the investigation is complete, a plan for communication to the wider-affected community and a plan to provide the affected individual(s) with necessary support will be developed and implemented in consultation with the child.
  - c. Final recommendations should be reviewed with the appropriate parties involved.
  - d. The investigator should determine if training or other supports would be beneficial to any team members involved and recommend a review of existing policies to determine if they need to be updated or redistributed to team members, as appropriate.
6. Final Report and Action Plan
- a. A final investigation report should include documentation of the allegation, interview timeline and notes, summary of information gathered, internal policies or procedures violated, recommended actions, support services offered to victims whether accepted or not, and post-investigation follow-up conversations. An

action plan should be developed that relates to follow-up and support for involved individuals, as well as wider systemic findings and lessons learned from the investigation that might improve Kids Alive's safeguarding practices.

- b. These reports and action plans will be written in English and the relevant language of the subject country.

### 3.12 Grievances

*Each program site will establish and adhere to a process for responding to grievances and complaints that have been expressed by a participant in its program, whether it is related to abuse or not. (If the grievance or complaint is related to abuse, the reporting procedure outlined in Section 3.11: Reporting Safeguarding Concerns or Policy Violations should be followed.) These processes will be child-friendly, allow for a variety of mechanisms and communication methods, and be developed in consultation with the children served by each program. This is a great way to practice KAI's value of Understanding as we listen to children, learn from them and show them we care enough to respond.*

Kids Alive has the responsibility to encourage and develop regular opportunities for children and adolescents to engage in conversations and open dialogue where they can express their views, thoughts, questions, and concerns. Grievances, concerns, and abuse-related disclosures from children should be taken seriously and should inform program development, policy formation, and other activities and documents that will have an impact on program recipients.

Kids Alive International recognizes that due to developmental stages, the identification of a grievance or complaint may differ for children and adults. Therefore, child-friendly complaint mechanisms should establish appropriate methods of communication to adequately address the concerns of children. Complaints from children are likely to be less formal and may be implicit or hidden in the form of a question or general reflection. Each Kids Alive program should have the flexibility to design a complaint mechanism that makes sense for that environment. However, these are the parameters that all complaint mechanisms need to be designed within:

- Children in KAI programs should be involved in the design and review of the complaint mechanisms developed at each program and site.
- The best interests of the child should be respected at every stage of the grievance process.
- Obstacles to accessibility of the complaint mechanism should be assessed. This should include removing formalities that would inhibit children from sharing their concerns and identifying visible and less visible barriers to be addressed appropriately.
- Properly respond to each and every grievance or complaint made by a child, regardless of the nature of the complaint.
- The grievance response process should be carried out in a swift and timely manner with consideration to the nature of the case.
- The grievance must be handled in a fair manner that includes communicating and respecting pre-established rules of procedure, conducting adequate investigations, gathering the views of various individuals, and taking steps to remove bias.

- Children should be informed of the complaint-handling process, the status of the complaint at each stage, and its outcome in a safe, respectful, and non-threatening manner.
- Grievance information should be kept private and confidential. If it is deemed that the information must be shared (e.g., if a crime was committed) the person handling the grievance should clearly communicate to the child who the information will be shared with, what specific information will be shared, and why.
- Partnerships should be developed with other institutions and community resources to compensate for any limited internal resources.
- Specialized staff should be responsible for handling complaints filed by or on behalf of children.
- A system should be established so that Kids Alive programs can learn from complaints by adequately collecting, analyzing, and understanding complaint data.

### 3.13 Child-on-Child Abuse

*Each program site will establish and adhere to appropriate supervision parameters and educational guidelines to reduce the risk of child-on-child abuse. In the event an allegation of child-on-child abuse is made by a child to KAI personnel, the KAI personnel will make a report consistent with Section 3.11: Reporting Safeguarding Concerns or Policy Violations of this policy. Regardless of who makes the allegation, an assessment will be conducted to understand what occurred, how it was able to occur, and what corrective actions are necessary. Corrective actions will then be implemented and monitored.*

Child-on-child abuse refers to inappropriate and harmful behaviors between children that are abusive in nature, including physical, sexual, or emotional abuse, exploitation, sexual harassment, and all forms of bullying (including cyberbullying). These concerns can involve children of similar or different ages; there is often a power imbalance between the children along with an intent to harm, control, or dominate another child through the use of force, coercion, intimidation, fear, or threats. It is often repetitive in nature and can escalate over time.

All concerns related to child-on-child abuse must be taken seriously and be properly assessed to determine whether an incident of inappropriate behavior or sexual activity between children amounts to abuse. Some concerns may not amount to abuse but rather stem from activity consistent with a child's developmental stage and brain development or an attempt to satisfy their curiosity by experimenting without a mature understanding of the consequences. It is possible that concerns may be a result of a child re-enacting their own sexual abuse, acting impulsively, and/or a child's mental health status. Whatever the reason, an appropriate assessment and response is necessary.

Assessments of these concerns and development of relevant responses should consider factors such as quality of caregiver relationships, caregiver monitoring and supervision, presence of positive or negative role models and peers, discipline practices in the home, child's response to corrective actions, exposure to and protection from traumatic situations, levels of sexual and/or violent stimulation, victimization, resilience factors, and networks of extended family,

neighborhood, school, and other social environments. Assessments should include identification of appropriate responses and corrective actions to prevent further instances or concerns related to abusive or inappropriate behavior between children.

It is important to understand that children who exhibit inappropriate sexual behavior may not have achieved the cognitive maturity or emotional regulation skills necessary to achieve emotional or behavioral control through self-understanding. Responding to children exhibiting inappropriate sexual behavior includes teaching children concrete rules about proper behavior and personal boundaries, identification and recognition of the inappropriateness of rule-violating behaviors that occurred in the past, age-appropriate sexual education and healthy sexual behavior, basic sexual abuse prevention and safety skills, and social skills. If a child is replaying their own abuse, it will likely be necessary to provide them with victim services, such as trauma-focused cognitive behavioral therapy.

Research has shown that certain environmental and personality factors are common among children who commit abuse against other children, including maltreatment and violence in the home, substandard parenting practices, neglect, exposure to sexually explicit media and high levels of sexualization, and personality characteristics including anxiety, depression, aggression, and low impulse control; and children who commit sex offenses are more likely to offend in groups, at school, and to have more male and younger victims. However, the existence of these environmental or personality factors does not mean that a child will abuse another child. Additionally, an incident involving a group, a male or young victim, or occurring at a school does not necessarily indicate that it amounts to abuse. Therefore, the circumstances surrounding each allegation of child-on-child abuse should be carefully considered.

Reinforcing our values, giving clear education and direction to children about appropriate behaviors, and encouraging empathy will help prevent incidents of child-on-child abuse. However, when a concern does arise, each situation must be carefully assessed based on the unique circumstances involved with the concern, and responses and corrective measures should focus on intervention and supervision rather than punishment.

### **3.14 Supporting Survivors**

*Kids Alive International is committed to supporting survivors of abuse through offering access to trauma-responsive counseling services, community resources, and support systems to aid them in the healing process. In some cases, survivors need access to medical evaluation and treatment.*

*Other methods of support include:*

- *In consultation with the child or vulnerable adult, developing a plan to address a survivor's safety and ensure provision of necessary services, support, and treatment*
- *Legal advocacy*
- *Assistance with food, childcare, and housing*
- *Specialized services for individuals with disabilities*

Trauma is complex and affects people differently. As such, each individual who has endured trauma must receive an individualized, holistic response in a caring setting which prioritizes that individual's safety, including their psychological safety. Kids Alive International personnel will utilize trauma informed and trauma responsive practices, including Trust-Based Relational Intervention® (TBRI) techniques as part of the effort of a healthy response to address trauma and help individuals heal. Personnel will also have access to additional support and guidance through the Global Trauma Care Lead.

### **3.15 Policy Implementation, Monitoring and Review**

*Kids Alive International will provide training consistent with this policy to support its effective implementation. On an ongoing basis, Kids Alive International will monitor implementation of safeguarding policies in its programs and will ensure that effective procedures are in place.*

*The Safeguarding Policy is expected to be widely available at Kids Alive International sites, and easily accessible to the children, adolescents, parents, caregivers, personnel, and others that are affiliated with our organization. Additional programmatic specific policies will be developed for individual KAI countries, so that they are relevant to their specific programs and operations.*

*KAI will ensure that all risks of child abuse are identified, reported, monitored, and reasonably mitigated against in the assessment of all its activities. The Safeguarding Policy will be reviewed triennially by a comprehensive and inclusive committee of individuals involved with Kids Alive International at all levels and revisions will be made as appropriate to include new learnings and best practices.*

## **4. APPENDICES**

## APPENDIX A: SAFETY REPORTING PROCESS







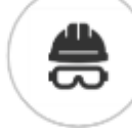



### CHILD & TEAM SAFETY REPORTING PROCESS

[report@kidsalive.org](mailto:report@kidsalive.org) • Call, Text, or WhatsApp +1 470-413-6010

Kids Alive International (KAI) is committed to program participant and team member safety. Therefore, anyone may communicate concerns directly with the Global Support Team. This communication is open to everyone and may be anonymous. Your identity will be protected unless you give permission for it to be used.

#### Team Members (Employee or Volunteer) MUST Report:

 <b>POLICY VIOLATIONS</b> Violations of Kids Alive International's Safeguarding Policy.	 <b>SEXUAL HARASSMENT OR SEXUAL ABUSE</b> Sexual misconduct by a team member to another team member or to a program participant.	 <b>EMOTIONAL ABUSE</b> Examples are public shaming, yelling, intimidation, and abusive or insulting language.	 <b>PHYSICAL ABUSE</b> Not only actions that cause physical harm but also threats - spoken or implied.
 <b>DISCRIMINATION</b> Discrimination of any kind due to nationality, age, race, tribe, community, ethnicity, or gender.	 <b>FINANCIAL MISCONDUCT</b> Financial mismanagement, theft, or fraud of KAI resources including the resources in Dominican Republic, Guatemala, Haiti, Kenya, Lebanon, Peru, UK, USA, and Zambia.	 <b>UNSAFE WORK CONDITIONS</b> Hazards to members' health and safety in the workplace.	 <b>OTHER MISCONDUCT</b> Other instances you believe to be misconduct or of concern.

**HINDERING OR DISCOURAGING A REPORT OR RETALIATION FOR A REPORT MADE IN GOOD FAITH WILL RESULT IN DISCIPLINARY ACTION AND MAY RESULT IN DISMISSAL.**

#### Reporting Process

1	REPORT IN-COUNTRY	2	REPORT TO GLOBAL SUPPORT TEAM	3	GLOBAL SUPPORT TEAM ACTION
	If you are directly impacted, observe, or suspect any of these activities, <b>first report to your Human Resources Manager, Safeguarding Officer, or the Country Director.</b>  Your country leaders may escalate your report to the Global Support Team for resolution.		If you feel unsafe, if no action has been taken on a previous report, or if the country leadership is who you wish to report, use these contacts to reach the Global Support Team.  <b><a href="mailto:report@kidsalive.org">report@kidsalive.org</a> Call, Text, or WhatsApp +1 470-413-6010</b>		If your country leaders escalate your report, or if you make a report with the Global Support Team directly, then the Global Support Team will follow up on your report, maintain confidentiality, ensure you do not receive any retaliation for making a report in good faith, and ensure that appropriate steps are taken to address the concerns.

**IF YOU WISH TO REMAIN ANONYMOUS VIA EMAIL, YOU CAN CREATE AN ACCOUNT WITH ANY FREE EMAIL SERVICE. IT IS IMPORTANT TO COMMUNICATE WITH THE PERSON THAT MAKES A REPORT - EVEN ANONYMOUSLY - TO REQUEST CLARIFYING INFORMATION AND PROVIDE FEEDBACK REGARDING RESOLUTION.**

Revision 09-JUL-2024

***This policy must be prominently displayed in locations where it can be read and accessed by every team member (employees and volunteers) of Kids Alive International, Kids Alive Haiti, Kids Alive Kenya, Kids Alive Lebanon, Kids Alive Zambia, Niños a la Vida (Peru), Vida para Niños (Guatemala), Vida para Niños (República Dominicana). Every Country Director must ensure that this policy is displayed and available in appropriate languages for all team members.***

## APPENDIX B: CONFIDENTIAL REPORTING FORM

### Safeguarding Concerns Report Form



#### Reporter Information:

Date \_\_\_\_\_

Name \_\_\_\_\_

Best contact info \_\_\_\_\_

Role at or Connection to  
Kids Alive \_\_\_\_\_

#### Location of Incident:

Country Name \_\_\_\_\_

Site Name \_\_\_\_\_

#### Incident Information:

Name(s) of  
Child(ren) \_\_\_\_\_

Age(s) of  
Child(ren) \_\_\_\_\_

Describe the  
Incident/Concern \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

☐ I would like to be contacted about this report.

## APPENDIX C: POTENTIAL INDICATORS OF ABUSE

### Physical Abuse:

- Unexplained bruises or welts on the face, lips, mouth, torso, back, buttocks, thighs, or injuries in various stages of healing.
- Bald patches on scalp
- Unexplained fractures/dislocations to various parts of the body
- Unexplained burns from cigars or cigarettes, especially on palms, soles, back, or buttocks
- Immersion burns - Infected burns may indicate a delay in seeking treatment
- Inadequate/Inconsistent explanation of how injury occurred
- Unexplained missing or loosened teeth
- Child wears concealing clothing, regardless of the weather
- Chronic running away
- Fear of medical examination
- Fear of suspected abuser being contacted
- Fear of physical contact – shrinking back if touched
- Self-destructive tendencies

### Neglect or Exploitation:

- Underweight/Hungry
- Exhibits poor growth patterns or failure to thrive
- Has poor hygiene or inappropriate dress
- Consistent lack of supervision
- Has unattended physical or medical needs
- Obvious abandonment
- Bald patches on the scalp
- Poor school attendance or chronic lateness
- Parent lacks interest in child's activities
- Lack of social relationships
- Compulsive scavenging
- Constant tiredness
- Destructive tendencies

### Factitious Disorder/Pediatric Condition Falsification/Munchausen Syndrome by Proxy (MSBP)/Medical Child Abuse:

- Unexplained seizures
- Life threatening events
- Chronic unexplained symptoms that resolve when child is protected
- Family history of similar sibling illnesses, unexplained sibling illness, or suspicious circumstances surrounding a death
- Discrepancies between history, clinical findings, and general health of child
- Unusual signs and symptoms that do not fit clinical diagnosis
- Repeated hospitalization and evaluations with definite medical diagnosis
- Caregiver welcomes invasive medical testing and displays considerable medical knowledge
- Rare or unexplained lab findings
- Falsification of medical history
- Repeated requests for sexual abuse evaluations, especially if previously addressed or no other indication of sexual abuse
- "Doctor shopping"

**Sexual Abuse:**

- Difficulty walking or sitting
- Torn, stained, or bloody clothing
- Pain, discomfort, swelling, or itching in the genital areas
- Pain upon urination
- Bruises, bleeding, or lacerations in the external genitals or anus area
- Poor sphincter control in a previously toilet-trained child
- Vaginal or penile discharge of a sexually transmitted infection
- Victims may act out sexually or on younger children
- Self-harm, suicide attempt, eating disorders, depression, running away
- Infantile behavior
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or a caregiver
- Trying to be perfect
- Overreacting to criticism
- Sexual behaviors that are inconsistent with a child's age or development
- Being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age
- Being isolated or withdrawn
- Nightmares
- Personality changes such as becoming insecure or clinging

**Sexual Exploitation:**

- Child frequently runs away
- Child is in possession of gifts/money of an unknown origin
- Unexplained bruises or injuries
- New pattern of doing poorly in school or otherwise disengaged
- Sleeping in inappropriate situations (such as the middle of class)
- Truancy and/or chronic absenteeism
- Gang involvement
- Changes in temperament/mood
- Withdrawn, uncommunicative, and/or isolated from family
- Not eating
- Little to no eye contact
- Substance use

**Emotional Abuse:**

- Regressive habits, such as rocking or thumb sucking in an older child
- Daytime anxiety and unrealistic fears
- Speech disorders
- Lags in physical, mental, and emotional development
- Hyperactive/disruptive behavior
- Displays low self-confidence/self-esteem
- Parent consistently displays ridicule and shame toward child or does not reward, praise, or acknowledge child's positive qualities or achievements
- Parent blames and punishes child for things over which the child has no control
- Child is threatened with abandonment or placement in an institution
- Continual self-deprecation such as "I'm stupid, ugly, worthless, etc..."
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain
- Neurotic behavior (rocking, hair twisting, self-mutilation)
- Extremes of passivity or aggression

**Possible Indicators of Discriminatory Abuse:**

- Unequal treatment due to race, gender, religion, age, sexuality, or disability
- Verbal abuse, inappropriate language, slurs, harassment, and deliberate exclusion
- Denial of basic human and civil rights
- Lack of choice
- Being refused access to services or being excluded inappropriately
- Substandard service provision relating to a protected characteristic

**Possible Indicators of Spiritual Abuse:**

- Use of scripture or religious beliefs to humiliate, embarrass, manipulate or bully
- Force or pressure by a religious leader to do something against one's will, including being intimate or having sex
- Use of religious texts or beliefs to justify other kinds of abuse
- Use of religious texts or beliefs to control a person's decision-making, clothing, behavior, sexuality, or choice of whether to have children

**Note:** Attachment styles can be helpful indicators of the quality of relationships between children and their parents/caregivers.

## APPENDIX D: RESOURCES

- **Kids Alive Values:** <https://www.kidsalive.org/about#values>
- **United Nations Convention on the Rights of the Child (UNCRC):** [https://treaties.un.org/pages/ViewDetails.aspx?src=IND&mtdsg\\_no=IV-11&chapter=4&clang=\\_en](https://treaties.un.org/pages/ViewDetails.aspx?src=IND&mtdsg_no=IV-11&chapter=4&clang=_en)
- **African Charter on the Rights and Welfare of the Child:** <https://au.int/en/treaties/african-charter-rights-and-welfare-child>
- **Keeping Children Safe:** <https://www.keepingchildrensafe.global/>
- **International Society for the Prevention of Child Abuse & Neglect (ISPCAN):** <https://www.ispcan.org/>
- **International Centre for Missing and Exploited Children (ICMEC):** <https://www.icmec.org/>
- **Adverse Childhood Experiences (ACEs):** <https://www.cdc.gov/violenceprevention/aces/index.html>
- **Trust-Based Relational Intervention (TBRI)®:** <https://child.tcu.edu/about-us/tbri/#sthash.n8l6MVjN.dpbs>
- **Mandatory Reporter Infographic for Youth Serving Professionals:** <https://cdn.icmec.org/wp-content/uploads/2020/05/MandatoryReporterFlyerUpdated.pdf>
- **Spiritual Abuse:** <https://www.goodtherapy.org/blog/shame-and-silence-recognizing-spiritual-abuse-0201175>
- **Recognizing Features of Grooming Process (English):** <https://www.icmec.org/wp-content/uploads/2019/10/Redwoods-recognize-patterns-image.jpg>
- **Recognizing Features of Grooming Process (Spanish):** [https://cdn.icmec.org/wp-content/uploads/2020/04/Redwood-Grooming-Infographic\\_ESP.pdf](https://cdn.icmec.org/wp-content/uploads/2020/04/Redwood-Grooming-Infographic_ESP.pdf)
- **Child Development and Developmental Milestones:** <https://www.cdc.gov/child-development/about/index.html>
- **Prevention of Child Maltreatment:** <https://www.childwelfare.gov/topics/prevention/?top=44>
- **Transformational Relationships for Youth Success:** <https://cssp.org/resource/transformational-relationships-for-youth-success-report/>
- **Authentic Youth Engagement:** <https://www.aecf.org/work/child-welfare/jim-casey-youth-opportunities-initiative/areas-of-expertise/authentic-youth-engagement>
- **Digital Safeguarding:** <https://www.anncrafttrust.org/an-introduction-to-digital-safeguarding/>