# CHOICE
# Integrity Policy


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# INTRODUCTORY DOCUMENT

Founded in 1997, CHOICE for Youth & Sexuality (CHOICE) believes in the unique and innovative power of young people to be key drivers of change. For over 20 years, CHOICE has been working with and for young people to fulfil their Sexual and Reproductive Health and Rights (SRHR).
CHOICE uses a dual approach, whereby we strengthen the capacity of young people to advocate for their own rights, while at the same time working together with them to amplify youth voices and increase meaningful youth participation in decision-making spaces. Our results over the past years demonstrate the unstoppable power of young people when we unite for a common cause – we are a force to be reckoned with!
CHOICE also collaborates with organisations working on youth SRHR to do so with and for young people in a meaningful way. We support these partners to successfully integrate young people in their SRHR programs and advocacy, and in all layers of their organisational structures. In the upcoming years, we will also expand our work to advocate for increased funding for youth-led organisations, programs, and projects, and support funders to make their way of working more accessible and youth-friendly.
Today CHOICE is based in the heart of Amsterdam and run by dedicated youth advocates, Board members, and staff members (henceforth, "CHOICE team" or "CHOICErs") with one shared vision, to ensure that:

***ALL* YOUNG PEOPLE HAVE THE POWER TO MAKE DECISIONS ABOUT THEIR SEXUAL, REPRODUCTIVE & LOVE LIVES!**

## 1.1 CHOICE'S CORE VALUES

CHOICE's core concepts and values are as follow:

- Advocate for Change
- Feminism
- Human-Rights Based
- Inclusion
- Meaningful Youth Participation
- Sex-positive
- Being an ally

In order to embody these concepts and values effectively, CHOICE strives for the highest possible integrity in its contact with all stakeholders, including but not limited to partners, volunteers, suppliers, the CHOICE team, and in relation to business property. CHOICE also aims to create a positive, educational and encouraging environment in which equality and mutual respect are ensured. It is therefore essential to create the highest possible degree of clarity regarding the basic principles all CHOICErs should internalise and integrate, as well as creating a framework facilitating their adoption and implementation within the organisation.

## 1.2 SUB-POLICIES, EVALUATION AND RESPONSIBILITIES

Apart from the contents of the Integrity Policy, members of the CHOICE team are obliged to comply with legal requirements and abide by common social norms and values.

This integrity policy consists of:

| **Name** | **Purpose** |
|---|---|
| Code of conduct | Stipulates the conditions of employment and engagement of the CHOICE team, consultants engaged on a temporary basis, trainees; i.e. everyone who performs work on CHOICE's behalf, regardless of the type of contract involved or the location where the work is carried out. |
| Individual complaints policy and procedure | Enables all CHOICErs to express their discontent about the organisation or (suspected) breaches of code of conduct by individual CHOICErs in a simple and accessible way. |
| Reporting procedure | Enables all those involved with CHOICE to openly speak about the work CHOICE does and reporting unlawful acts and (suspected) cases of malpractice within the organisation. It is aimed at improper activities |

| | |
|---|---|
| | which affect others, such as the organisation, its target group, or society as a whole. All without fearing detrimental acts of retribution and protecting the reporters. |
| Child protection policy | Ensures the fulfilment of children's right to protection. |

| | |
|---|---|
| Sexual harassment policy | Enables CHOICE's commitment to providing a safe environment for all CHOICErs, free from discrimination on any ground and from harassment at work including sexual harassment. |

The Child protection policy has been developed particularly with CHOICE's position as a youth-led and youth-focused development organisation working internationally in mind. CHOICE is committed to ensuring the fulfilment of all children's rights, including their rights to protection. It is important to note that integrity cannot simply be guaranteed by the adoption of a number of policies. A culture emphasizing an open and respectful attitude towards one another is also an important aspect of integrity. The CHOICE team commits to building and sustaining such a culture by all setting good examples through exemplary conduct, and by specifically informing all CHOICErs and stakeholders about Integrity. In addition to this, annual sessions will be held amongst staff to create awareness and exchange hands-on experience to integrate these policies into CHOICE activities. Moreover, this Integrity Policy is seen by CHOICE as a living document, meant to grow with the organisation and reflect lessons learned from new experiences, all the while remaining a guiding document with strong principles.

In line with the above philosophy, this set of policies will be reviewed annually and modified, if deemed appropriate, to ensure that they remain relevant to the organisation. When deemed necessary, new documents can be added. The review process is led by the Board of CHOICE, but also involves participation from the CHOICE staff and advocates, as well as from several external parties.

The Board is mandated with this annual review of the Integrity Policy, as well as with any additional revisions and associated follow-up, such as stakeholder consultation and ensuring handover of institutional knowledge. The Board appoints one of its members to hold in their portfolio. It is also responsible for keeping all members of the organisation continuously informed of changes in the policies as they are made. This includes occasional presentations going over the full array of CHOICE's organisational policies, the last of which took place at the 2019 Annual General Meeting. The Executive Director informs new staff team members explicitly about Integrity, and the Board with the Advocate guidance for advocates, when starting their involvement with CHOICE, as part of their onboarding. When officially becoming involved with the organisation, they also sign a form certifying reception and good understanding of a printed copy of the code of conduct and related procedures. CHOICE's partners are also informed about these policies and the code of conduct upon signing their Letter of Agreement. New staff are encouraged to follow the free online training "Safegaurding Essentials" by the Humanitarian Leadership Academy in their first month.

What's more, an internal Confidential Advisor on Undesirable Behaviour (Vertrouwenspersoon Ongewenste Omgangsvormen in Dutch, henceforth referred to in this policy as "Confidential Advisor") is available to all CHOICE team members to ensure confidentiality and a safe environment for team members to tell their story. As of January 2024, Jessica Steffens, Resource Mobilization Coordinator at CHOICE (email: jessica@choiceforyouth.org) and Lizzie Jackson, Programme Coordinator at CHOICE (email: lizzie@choiceforyouth.org) have been appointed to the Confidential Advisor role after having followed the 'Basic Training Confidential Counsellor' with Merlijn Groep. The aim is to set up a continuous moral learning process in line with the Partos Integrity Systems guide and ensure an always evolving and appropriate framework for integrity within the organisation.

# CODE OF CONDUCT

## 2.1 INTRODUCTION

CHOICE is guided by our mission, vision and values as stipulated in our multi-annual strategy 2019-2022. We seek to develop an organisational culture that is reflective of our values.

## 2.2 PURPOSE

This Code of Conduct is a tool that is to be used in conjunction with other policies and procedures of CHOICE to determine the conditions of employment and engagement of the CHOICE staff team, Youth Advocates, and Board members (henceforth "CHOICE team" or "CHOICERs"). It is informed by International and United Nations standards. Its purpose is to provide the CHOICE team with:

- Guidance to working with a sense of integrity, especially in situations of ethical ambiguity;
- A means of identifying deliberate or inadvertent inequities of power dynamics;
- A blueprint to protect all young people – both those within CHOICE and those who interact with CHOICE through programming, advocacy, mentorship, internship and partnership – from exploitation and;
- A framework for implementing, monitoring and enforcing the Integrity Standards and Code of Conduct for CHOICE as an organisation.

All CHOICERs are encouraged to treat one another in an open and professional manner. Differences in culture, religion and political persuasion are to be respected. If the Code of Conduct is observed, then everyone involved can rest assured that they will be treated with respect, while they are also expected to treat others respectfully. They will then also not be subjected to inappropriate behaviour, while they are similarly expected to refrain from behaving inappropriately. CHOICE's intention is to provide a working environment in which any form of intimidation, hostility or other infringements which might affect the performance or dignity of a person is not present. Any form of inappropriate behaviour – be it verbal, physical or visual – will not be tolerated.

## 2.3 SCOPE

The Code of Conduct is applicable to the entire CHOICE team; i.e., everyone who performs work on CHOICE's behalf, regardless of the type of contract involved or the location where the work is carried out. Upon signing this Integrity Policy and Code of Conduct, each member of the CHOICE team commits to the principles outlined in this Integrity Policy and Code of Conduct[1]. No team member is exempt from this Integrity Policy and Code of Conduct, and breach may result in disciplinary action (including dismissal in some instances), and in some cases could lead to criminal prosecution. This Code is subject to relevant international human rights law, wherever the employee is employed and shall be read in a manner that is compliant with that law.

Should any member of the CHOICE team, or any other individual external to CHOICE feel that the behaviour of, or statements made by anyone performing activities on behalf of CHOICE is not in line with this Code of Conduct, then CHOICE kindly requests that they submit a complaint to the Executive Director (ximena@choiceforyouth.org), Chair of the Board (alba@choiceforyouth.org) or The Integrity Coordinator (independent third party https://choiceforyouth.trusty.report/) in accordance with the personal complaints procedure. Employees can also turn to the Confidential Advisor for advice, assistance and support. CHOICERs who experience undesirable behavior can approach the Confidential Advisor on a confidential basis for a listening ear, advice and assistance.

## 2.4 FORMS OF INAPPROPRIATE BEHAVIOUR

Inappropriate behaviour is defined in this policy as behaviour on the part of a CHOICEr which the individuals they interact with might find intimidating, humiliating, or hostile. This definition is purposefully broad, so that each person may be given the opportunity to draw their own boundaries and specify what constitutes an inappropriate behaviour to them. In accordance with the Working Conditions Act (Arbowet) and the Partos Code of Conduct, this policy outlines five types of inappropriate behaviour – sexual harassment, discrimination, and aggression and violence, including bullying, abuse of power, and financial violations. These five definitions are meant to cover most instances of inappropriate behaviours but are not necessarily an exhaustive list. They are presented in the following section.

### 2.4.1 SEXUAL HARASSMENT

The Working Conditions Act defines sexual harassment as 'any form of verbal, non-verbal or physical behaviour with a sexual connotation, which is intended to or actually has an adverse

[1] CHOICE employees having already signed their contract are exempt from articles of the Integrity Policy and Code of Conduct with which they were not given an opportunity to comply with before signing the Code of Conduct. However, by signing the Code of Conduct, they commit to adhering to these articles as soon as given the tools to do so.

effect on a person's dignity, and in particular if it creates a threatening, hostile, offensive, humiliating or hurtful situation.' Examples of this range from unwanted attention in the form of requests for sexual favours, to other verbal, non-verbal or physical behaviour (including the unwanted / non-professional forwarding or public viewing of pornographic images or text, e.g. on the internet).

#### 2.4.2 BULLYING

Inappropriate behaviour need not necessarily be of a sexual nature. It can also occur in the form of psychological or physical bullying and intimidation. The Working Conditions Act also covers bullying. It is defined as follows: 'all forms of intimidating behaviour of a structural nature, by one or more employees (colleagues, superiors) targeted at a particular employee or group of employees who are incapable of protecting themselves from this kind of behaviour.'
Bullying occurs when the perpetrator deliberately intends to hurt and/or humiliate another person and repeats these intentionally harmful behaviours over a certain period of time. Thus, isolated incidence of these behaviours cannot be considered bullying.
Characteristically, behaviours that make up bullying consist of words, gestures, and acts of threat, which include but are not limited to hurtful words, gestures, jokes, cartoons, images, posters email jokes or messages, physical contact or attacks.

#### 2.4.3 AGGRESSION AND VIOLENCE

Extreme forms of intimidation include aggression, or even go so far as the use of violence. The Working Conditions Act defines aggression and violence as follows: 'Incidents in which an employee is psychologically or physically harassed, threatened or attacked in circumstances which are directly associated with the performance of work.' Aggression and violence can be categorised as follows: verbal violence (such as being sworn at or insulted), physical violence (such as being kicked, punched, pushed, struck with a weapon, or having one's property damaged) and psychological violence (such as being threatened, intimidated, coerced, and intrusion on one's private life).

#### 2.4.4 DISCRIMINATION

Discrimination occurs when a person does not receive equal treatment in identical circumstances. The legal definition of discrimination is as follows: 'Discrimination or discriminatory is any form of distinction, any exclusion, restriction or preference which is either designed to or may result in diminishing or the denial of the recognition of, or the opportunity to exercise one's equality by virtue of the Human Rights and Fundamental Freedoms in the field of political, financial, social or cultural matters, or in other areas of social life.'
Differences in culture, religion and political persuasion also have to be respected. CHOICE shall neither tolerate anyone being subjected to expressions, acts or decisions, in any form whatsoever, which may be hurtful to people on the basis of their race, religion, gender, personal convictions and/or sexual persuasion, nor any distinction being made according to these factors (race, religion, etc.).

#### 2.4.5 ABUSE OF POWER

Abuse of power refers to acts of corruption, nepotism or conflict of interest, manipulation or sharing of information.
Confidential information is only accessible to those authorised to have access, and therefore entrusted to ensure its integrity, confidentiality and privacy of such information to protect any individual, group or organisation involved.
Conflicts of interests are defined as any situation in which a CHOICEr has professional, personal interest obligations which might or may have the appearance of influencing a persons' judgement and ability to perform their duties in line with the organisations' values, interests and requirements for public accountability and fairness.

#### 2.4.6 FINANCIAL VIOLATIONS

Financial violations are defined as any acts of fraud, irresponsible handling of resources, theft, tax-evasion and inside trading.

### 2.5 SANCTIONS AGAINST INAPPROPRIATE BEHAVIOUR

Breaches of the Code of Conduct can be reported based on the procedures outlined in the Complaints Procedure. The severity of the inappropriate behaviour will be assessed and

sanctioned on a case-by-case basis.

Anyone who has been found in breach of the code of conduct following a complaint made about them is liable to any of the following sanctions, on the basis of the severity and impact of the actions:

1. Further clarification of the Integrity Policy, the Code and the policies and procedures via communications or enhanced training
2. A verbal or written warning
3. Adverse performance evaluation
4. Enforcement of a probation period of 6 months
5. Suspension for a period of 3 months
6. Termination of the employment contract, volunteer contract, or the contract for (consultant) assignments within a 1-week notice period
7. Other disciplinary measures, as deemed appropriate
8. Legal action
9. Informing the relevant authorities

The nature of the sanctions will depend on the gravity and extent of the complaint and the result of an investigation following a complaint.
Gravity of the complaint will be determined by the Integrity Coordinator responsible for the investigation in correspondence with the ED and the Chair of the Board and will ensure that both parties, the complainant and the person complained against receive just treatment. Taking in the perspective of the complainer, using the evidence provided in their oral statements and the effect that the conduct had on their mental and physical wellbeing, as well as, objectively analysing the evidence provided by the person complained about to the contrary will be the cornerstones of this determination. Suitable deterrent sanctions will be applied to ensure that incidents are not treated as trivial.
In the case where an inappropriate behaviour is also illegal, or where the investigation into a complaint reveals that something illegal has been done, CHOICE will also seek legal action against and/or alert the authorities of this.

## 2.6 REPORTING

Reported breaches of the code of conduct, if having taken place, and the given sanctions will be reported on in the organisation's annual report. For more information on the reporting of inappropriate behaviour or ethics violations within the organisation, please refer to the Reporting Policy.

## 2.7 INTEGRITY PRINCIPLES AND CODE OF CONDUCT

As a member of the CHOICE team, you commit to representing yourself and CHOICE with integrity, meaning you commit to the following:

*Integrity*
I will uphold the values of CHOICE for Youth and Sexuality by ensuring that my personal and professional conduct in the workplace and while representing CHOICE is consistent with the organisational values.
These values are as follows:

- Advocating for Change
- Feminism
- Human-Rights Based
- Inclusive
- Meaningful Youth Participation
- Sex-positive
- Being an ally

I will be diplomatic and professional in interactions with donors, stakeholders, partners and the general public. To be so, I will be respectful of others, be sensitive in dealing with them, and will seek peaceful resolution to conflicts through discussion.

*Law and Culture*
I will be sensitive to local culture and respectful of local customs, as appropriate. I will make a sincere and concerted effort to engage sustainably and ethically with the communities, cultures and natural environments in which I work.

I will seek support or advice from my colleagues at CHOICE if these norms and values contradict either the CHOICE Integrity Policy and Code of Conduct or my own personal values.

I will inform CHOICE of any relevant criminal convictions or charges I have had prior to my employment, or face during employment, that may impede my ability to undertake my professional duties.
I will provide a Certificate of Conduct (Verklaring Omtrent Gedrag, or VOG, in Dutch) at the start of my employement with CHOICE.

## 9 CHOICE INTEGRITY POLICY

*Unequal Power Dynamics*
I will treat others with respect, dignity and compassion, and harness my position and privilege as a CHOICE team member to prevent exploitation, abuse, harassment, discrimination, corruption or intimidation.

When undertaking CHOICE activities, I will remain attuned to possibilities for exploitation or uneven power distribution and will act with integrity to prevent and counteract injustice. I will ensure that my relationships and behaviour as a team member of CHOICE are in no way exploitative, abusive or corrupt.

*Youth and Marginalized Groups*
I will respect all peoples' rights, and particularly the rights of youth and marginalized groups, in a manner that is consistent with CHOICE's intersectional values.
I will promote compassion and contribute to a working environment that is typified with mutual respect and non-discrimination, in accordance with CHOICE Child Protection Policy and Sexual Harassment Policy.

I will remain cognizant of the fact that CHOICE works primarily with youth-led organisations and as such, will not perpetuate or engage in sexual or romantic relationships where an unequal power imbalance is present. I will access CHOICE's official reporting channels if I find evidence or a credible likelihood of a CHOICE team member exploiting their power in this manner.

*Corruption*
I will undertake my work responsibilities in a manner that befits the values of the CHOICE team and avoid potential conflicts of interests between my duties for CHOICE and my own personal life. I will inform CHOICE of any other appointment and clarify whether any conflict, or perceived conflicts, with my duties with CHOICE may arise.

I will declare any financial, personal, family (or close intimate relationship) interest in matters of official business which may impact on the work of CHOICE.

I will not promise or deliver any assistance as a CHOICE team member or on behalf of CHOICE as an entity in exchange for compensation (i.e. gifts, payment, and other quid pro quo activities). If I do receive a gift as a show of gratitude for assistance delivered as a CHOICE team member, that should be accepted as a gesture of politeness or whose acceptance will serve a humanitarian/communal purpose, I will only accept it if it is worth less than 25 euros, and I will report it to the Executive Director. In this context, the term 'gift' is defined as any material object, in either monetary or non-monetary form, which is given for the specific purpose of benefitting the giver and the recipient. This does not include gifts which are customary in our professional field and which are not of considerable financial value. If you have any doubt whatsoever in this regard, you should consult the Executive Director.

I will stand against corruption, bribery and exploitation of the information, access and influence that may come with my role as a member of the CHOICE team.

*Non-Disclosure*
I will not disclose sensitive or confidential information learned during, following or as a consequence of my role within the CHOICE team. This commitment continues beyond the period of my employment.
I will recognise that CHOICE is the sole owner of all rights and interest in and to all materials, reports, information, documentation and other written works created, compiled or produced by a party while either employed by CHOICE or acting on behalf of CHOICE. I will not claim such products as personal property.

*Resources*
I will be responsible in my handling of funds, equipment, resources and information at all times. I will appropriately account for any CHOICE resources I use, including money, equipment and accommodation. I will be responsible in my use of the Internet on and with CHOICE property.

*Health, Safety and Security*

I will adhere to CHOICE's Safety and Security Policies and will, within reason, protect the health, wellbeing, safety, security and welfare of all CHOICE beneficiaries, partners, team members and stakeholders.

I will undertake and act on appropriate risk assessments and comply with local security management guidelines. I will contribute to updating outdated policies to preserve the safety of myself and others.

## 10 CHOICE INTEGRITY POLICY

I will avoid acting in a manner that creates unnecessary risk to myself or others in the course of my work.

I will remain within the law in all circumstances within reason, unless emergency actions outlined in CHOICE's other policies (particularly Safety and Security policies) advise otherwise to save my life or the life of someone else.

*Sexual, Reproductive Health and Human Rights*
I will promote and preserve sexual and reproductive health and rights and human rights in the course of my work. I will ensure that my conduct is consistent with CHOICE policies and professional best practice.

*CHOICE Policies*
I will adhere to following all of CHOICE for Youth and Sexuality's policies and procedures that support the above Integrity Principles and Code of Conduct, namely:

- The Individual Complaints Procedure
- The Reporting Policy
- The Safety and Security Policy
- The Sexual Harassment Policy
- The Child Protection Policy

In accepting my appointment, I undertake to discharge my duties and to regulate my conduct in accordance with the requirements of this Integrity Policy and Code of Conduct.

Name……..
Signature……...
Date……

# CHOICE INDIVIDUAL COMPLAINTS POLICY AND PROCEDURE

## 3.1 INTRODUCTION

CHOICE for Youth and Sexuality finds it important that everyone can express their discontent about the organisation in a simple and accessible way. CHOICE considers complaints as free advice, which helps to improve the organisation to work towards achieving its mission. Therefore, all complaints will be taken seriously. This policy is intended for individual complaints and circumstances which affect the complainant personally. For example, complaints concerning discrimination, failure to reach decisions, failure to meet commitments or inappropriate behaviour as defined in the code of conduct. CHOICE has a separate Sexual Harassment Policy and procedure for complaints regarding sexual harassment. For complaints involving children and harassment, CHOICE has a Child Protection Policy.

In addition to these policies, CHOICE also has a reporting procedure, which is intended for the purpose of reporting unlawful acts and (suspected) cases of malpractice within the organisation. It is aimed at improper activities which affect others, such as the organisation, its target group, or society as a whole. The procedure describes the manner in which CHOICE deals with reports of this nature.

This 'CHOICE Individual Complaints Policy and Procedure' should be understood as an integral part of the 'Integrity Policy', which also includes the 'Code of Conduct', the 'Reporting Procedure', the 'Sexual Harassment Policy', and the 'Child Protection Policy'. It is important to note that the 'Reporting Procedure' concerns complaints regarding unlawful acts or (suspected) malpractice, which need not directly affect the complainant, but could concern undesirable conduct of a general, operational, procedural, or financial nature, which affects others, such as the organisation as a whole, our external partners, the key communities we work with, or society as a whole. This 'Individual Complaints Policy and Procedure' concerns complaints that directly negatively impact the complainant, for example inappropriate behaviour, bullying, and discrimination.

CHOICE for Youth and Sexuality finds it important that everyone can express their discontent about the organization in a simple and accessible way. CHOICE considers raising questions, concerns or complaints as free advice, which helps to improve the organization towards achieving its mission. Therefore, all submissions or reports will be taken seriously.

## 3.2 DEFINITION OF TERMS

1. Individual complaint: any *written* expression of grievance by a complainant regarding services provided to the complainant by which the complainant was affected or regarding the actions or negligence of Board members, staff or volunteers.
2. Complainant: any natural or legal person who files a written complaint.
3. The Integrity Coordinator: The Integrity Coordinator is an independent third-party service provider to whom complaints and reports (see chapter 4) can be submitted and who can, if needed, assist in investigating and handling the case.

## 3.3 WHO CAN SUBMIT A COMPLAINT

Any affected natural or legal person may submit a complaint.

## 3.4 WHO CAN PROCESS A COMPLAINT

Complaints can be filed through three mechanisms, namely:

1. With the Executive Director of CHOICE
2. If you are not comfortable to discuss it with them, or if you don't agree with their point of view, you can raise your question or concern with the Chair of the Board
3. If for some reason you prefer not do this, you can also submit your question or raise your concern through our platform Choiceforyouth.trusty.report .

Employees can also turn to the Confidential Advisor for advice, assistance and support.

The platform Choiceforyouth.trusty.report is operated by an independent third-party service provider and if you prefer that, they will guarantee that your identity is kept confidential or you can report anonymously. That said, it is often easier to investigate a matter if we know who you are.

Reporting concerns and asking questions are fundamental to following our Integrity Policy and Code of Conduct, to living up to our values and keeping a good reputation. It allows us to address the matter and correct the problem, if necessary. We have therefore also made the link to our platform Choiceforyouth.trusty.report available for our partners via our website.

We take all reports seriously and we will review, evaluate and investigate them in a confidential, fair and impartial way in accordance with the investigation procedure. We will not retaliate against any employee or business partner who raises a question or a concern in good faith (see 3.15).

If you believe however that retaliation did take place after you have submitted a report, you can also report this via Choiceforyouth.trusty.report and/or turn to the House for Whistleblowers for advice and support (if applicable).

## 3.5 LETTER OF COMPLAINT

1. A formal complaint is filed by submitting a letter or email of complaint to the Executive Director or the Chair of the Board, or by filing a complaint to the Integrity Coordinator via our platform Choiceforyouth.trusty.report
2. The letter/email of complaint should include at least:
    1. A notification that the letter/email concerns a complaint and that this complaint should be handled according to the complaints policy and procedure;
    2. Name and address of the complainant. If the complainant wishes to be anonymous, they should state this instead of their contact details. However, a report submitted anonymously makes it difficult to carry out the full formal complaint procedure, making it more difficult to investigate the report;
    3. The date of writing/registering;
    4. A description of the act/behaviour complained about;
    5. The reason why the complainant objects to this act/behaviour;

If you decide to file your complaint through our platform Choiceforyouth.trusty.report, the platform will take you through the necessary steps.

## 3.6 RECEIPT AND REGISTRATION OF COMPLAINTS

If the Executive Director or the Chair of the Board can answer the question or take away the concern immediately, there is no need for further action. However, in order to ensure that all signals of potential wrongdoing are duly noted, it may be considered to submit a report through our platform Choiceforyouth.trusty.report nevertheless. Questions or concerns which need to be investigated further have to be reported to The Integrity Coordinator through CHOICE@theintegritycoordinator.com

As soon as a complaint is submitted to The Integrity Coordinator, the Executive Director of CHOICE will be notified and the Chair of the Board will receive a copy of the notification. If the person who has submitted the complaint has chosen to remain anonymous, The Integrity Coordinator will not reveal the identity of the reporter.

The Integrity Coordinator will however screen the complaint for implicated parties. If it would appear that the Executive Director or the Chair of the Board is implicated in the complaint, he, she or they will not receive a notification of the case and he, she or they will not have access to this case. In that instance, another Board member will be involved in the case to replace the implicated party.

Within 3 working days after submission of the complaint, the person who submitted the complaint will be informed that the question or concern has been received. It is also possible that the reporter will be asked to submit additional information.

The Integrity Coordinator will review the matter and propose the next steps to the Executive Director and Chair of CHOICE (or their replacement). Together they will discuss the nomination of an impartial (lead) investigator.

## 3.7. CONDUCTING INVESTIGATIONS

Each report will be taken seriously and investigated properly by an impartial investigator or a team of impartial investigators. The Executive Director and/or the Chair of the Board may involve other associates to assist in the investigation, as long as these associates keep all information confidential.

If CHOICE would lack the resources to investigate the case sufficiently or independently, the Executive Director or Chair of the Board may engage third party specialists to assist with the investigation. This has to be approved by a majority of the Board.

If necessary, the investigation may include that physical or digital files, including e-mail files, of an

associate are searched, as long as these personal files reside on company property, like a company server, notebook or telephone. This step will not be taken lightly and requires the unanimous approval of the Executive Director, the Chair of CHOICE and a member of staff, preferably the Confidential Advisor (or their replacements in case any of these persons would be implicated in the case).

If an allegation has been made against an associate or a partner, and evidence is found to support the allegation, the associate or the partner will be given an opportunity to defend his or her case. If no evidence is found, the personal data will be removed from the case.

During the course of the investigation, we request all associates to cooperate with the investigation, though everybody also has the right to remain silent. In case that an associate is interviewed, he, she or they has the right to request that a person (a counsellor) attends the interview on his/her/their behalf. This can also be a colleague, as long as this person is not implicated in the investigation.

## 3.8. CONFIDENTIALITY

When you submit a question or a report, it will be handled in a confidential manner, with disclosure limited to enable CHOICE to conduct a full investigation of the alleged violation.

### 3.9. REPORTING THE OUTCOME OF THE INVESTIGATION

Within 90 days after the confirmation of the receipt of the report, The Integrity Coordinator will provide high-level feedback to the reporter about the progress of or the outcome of the investigation. It is possible that, at that time, the investigation is still continuing. In that case The Integrity Coordinator will keep the reporter informed about the progress. We aim to inform the reporter on a bi-monthly basis, but if that is not suitable, at least on a quarterly basis.

Once the investigation has been concluded, The Integrity Coordinator, the Executive Director and the Chair of the Board will discuss the outcome of the investigation. The Executive Director will propose to the Board how to address the matter. Potential measures for CHOICE associates may include:

- Further clarification of the Integrity Policy, the Code and the policies and procedures via communications or enhanced training
- A verbal or written warning
- Adverse performance evaluation
- Enforcement of a probation period of 6 months
- Suspension for a period of 3 months
- Termination of the employment contract, volunteer contract, or the contract for (consultant) assignments within a 1-week notice period
- Other disciplinary measures, as deemed appropriate
- Legal action
- Informing the relevant authorities

In addition to this, external partners may face:

- A temporary suspension of funding and/or other forms of contractual agreements
- Permanent termination of the partnership contract
- Temporary suspension of funding and/or other forms of contractual agreements
- Permanent termination of partnership contract
- Relevant legal action

As CHOICE does not hold mandate over external parties, the strongest course of action that can be taken by CHOICE are the aforementioned ones. ***All third parties must be made aware of this policy at the time of signing a contract or during partnership agreement talks by the CHOICE member responsible for that contract***

It is however also possible that the Executive Director and the Board conclude that there is insufficient evidence to support the case. The Board and the Executive Director, and if necessary in consultation with external experts or the integrity coordinator, will determine which measures will be taken.

The Integrity Coordinator will inform the person who submitted the complaint on the final outcome

of the investigation (substantiated or not substantiated) on behalf of the Executive Director and the Board. If the report is not substantiated, the Executive Director and the Board will indicate the (high-level) reasoning behind that decision. The reporter will be given two weeks to respond to the decision and to submit additional evidence, if applicable. In case that the reporter feels that his or her concerns have not been properly addressed, the reporter can turn to the Dutch House for Whistleblowers. See: www.huisvoorklokkenluiders.nl for information in Dutch, and www.huisvoorklokkenluiders.nl/english for more information in English.

The outcome of the investigation will be put in writing. The report will describe the methodology used, the evidence that was found, the facts and circumstances, as well as the relevant laws, regulations, policies and guidelines. The Executive Director will add the corrective and preventive measures taken, if applicable. The file will be archived in a confidential way and be deleted when appropriate, in accordance with data protection laws.

The Integrity Coordinator will report anonymized metrics about this procedure to the Executive Director and the Chair of the Board, as well as trends and other relevant developments.
All decisions of processed complaints are recorded in the complaints register. This register is administered by the Executive Director of CHOICE, at the office of CHOICE in Amsterdam, the Netherlands. Twice a year, the Executive Director and the Board assesses all (anonymous) complaints made and decide whether structural improvement are necessary.

## 3.10 APPEAL

If the complainant is dissatisfied with the decision of the Executive Director and Board of CHOICE, the complainant has the possibility to appeal with the Dutch Court of Justice.

## 3.11 WHISTLEBLOWER POLICY

1. CHOICE aims to protect anyone who reports a violation of ethics within the organisation, an ethics violation or violation of the Code of Conduct. They should be able to do so without fear of retaliation. In conducting its investigations and in dealing with complaints under this policy, CHOICE will strive to keep the identity of any complainant or any individual who provides information during the course of an investigation confidential, unless information is needed in order to make a fair judgement, or Dutch law requires us to break confidentiality.
2. CHOICE will not knowingly take any action harmful to any complainant or individual who provides information during the course of the investigation, including interfering with their lawful employment or livelihood, for:
    a. Reporting a complaint in good faith pursuant to this policy to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant;
    b. Providing, in good faith, information regarding a complaint to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant; or
    c. Otherwise participating or assisting in a proceeding filed or about to be filed.
3. Interferences with lawful employment and livelihood covered by the protection referred to in point 2, are decisions aimed at:
    a. dismissal, other than at the employee's own request;
    b. premature termination or non-renewal of a fixed-term employment contract
    c. failure to convert a fixed-term employment contract into a permanent one
    d. the reallocation or transfer of the employee, or rejection of a request to do so
    e. the imposed allocation of a different position
    f. the extension or restriction of duties, other than at the employee's own request
    g. taking disciplinary measures
    h. withholding a wage increase
    i. withholding a promotion
    j. refusal to grant leave.
4. Persons who threaten retaliation against a person reporting a suspected fraud shall be subject to disciplinary action, up to and including termination of employment and if applicable report to the police.
5. An individual who deliberately or maliciously provides false information, may, be subject to disciplinary action, up to and including termination of employment and if applicable report to the police.

## 3.12 RETENTION OF COMPLAINTS AND DOCUMENTS

All complaints will remain confidential to the extent practicable, unless information is needed in order to make a fair judgement, or Dutch law requires us to break confidentiality. In addition, all written statements, along with the results of any investigations relating thereto, shall be securely retained by CHOICE in digital or hard copy.

## 3.13 INFORMAL ADVISORY

If the complainant wishes to have an informal discussion about the matter, they can contact the Confidential Advisor for confidential guidance and support. In this case, a written Complaint Letter is not necessary – an oral discussion or email is sufficient. The Confidential Advisor will ensure that a confidential record is kept of what happens and follow up afterwards.

# CHOICE REPORTING PROCEDURE

## 4.1 INTRODUCTION

At CHOICE we aim to enable and protect a safe space, to ensure all those involved can openly speak about the work we do, and the direction we go in as an organisation. We maintain an open attitude towards critical voices, coming from internal and external individuals, and take the feedback we receive into account in our decision-making as an organisation. Besides the different informal avenues for feedback, we also offer employees the opportunity to submit an official complaint to report an unlawful act or (suspected) malpractice. This is different from the complaints policy, since the unlawful act of (suspected) malpractice does not necessarily need to affect the individual who submitted the complaint. This 'Reporting Procedure' provides those seeking to report an unlawful act or (suspected) malpractice within the organisation, a comprehensive and formal overview of their rights, and the appropriate procedures. In addition, the dissemination and integration of this procedure, as part of the Integrity Policy, into the organisation aims to create a sense of personal responsibility for the organisation and its conduct and aims to contribute to the critical and self-reflective organisational culture. Moreover, it is important that CHOICE is a youth organisation, and it is therefore the aim to draft summaries of these policies using youth-friendly language to improve accessibility, while being mindful of the legal and formal nature of this document. This drafting process will start after a first assessment of the policies has taken place.

This 'CHOICE Reporting Procedure' should be understood as an integral part of the 'Integrity Policy', which also includes the 'Code of Conduct', the 'Individual Complaints Policy and Procedure', the 'Sexual Harassment Policy', and the 'Child Protection Policy'. It is important to note that the 'Individual Complaints Policy and Procedure' concerns complaints that directly negatively impact the complainant, for example inappropriate behaviour, bullying, and discrimination. This 'Reporting Procedure' concerns complaints regarding unlawful acts or (suspected) malpractice, which need not directly affect the complainant, but could concern undesirable conduct of a general, operational, procedural, or financial nature, which affects others, such as the organisation as a whole, our external partners, the key communities we work with, or society as a whole. If unsure which procedure to use, you are encouraged to speak out through any of the channels mentioned in both documents with which you feel most comfortable, and the receiver will start the adequate the procedure.

Besides CHOICE's 'Integrity Policy', including this 'Reporting Procedure', more (free) information about the legal position of complainants and whistleblowers can be found at the *Huis voor Klokkenluiders (Whistleblower Authority).* For more information see www.huisvoorklokkenluiders.nl for information in Dutch, and www.huisvoorklokkenluiders.nl/english for more information in English.

## 4.2 DEFINITION OF TERMS

The following definitions of terms are applicable in this document, the 'Reporting Procedure':

1. Employee: employee refers to individuals currently or formerly working for CHOICE under a contract. Therefore, employee refers not only to the staff of CHOICE, but also to external partners working for CHOICE, Youth Advocates (volunteers), Board members, consultants and other self-employed individuals, and interns.
2. Employer: employer refers to the organisation that has currently, or had formerly, work performed based on a contract of employment in accordance with civil law, or does so, or did so, on the basis of an agreement other than an employment contract, such as a volunteer contract. In this document, employer will refer to CHOICE for Youth and Sexuality.
3. Suspected malpractice: an employee's suspicion of malpractice within the organisation for which they currently work, or have previously worked, or another organisation with which they came into contact in the course of performing their duties, insofar as:
    a. There are reasonable grounds for the suspicion, arising from the knowledge that the employee acquired in the service of his employer, or arising from the knowledge that the employee acquired during the course of performing work for another company or organisation, and
    b. Public interest is at stake due to:
        1. An infringement of a legal regulation, including a criminal offence;
        2. A threat to human health;
        3. A threat to people's safety;
        4. A threat to environmental damage;

5. A threat to proper functioning of the public service or a company because of improper behaviour or negligence;
6. An intention to provide incorrect information to public bodies;
7. A waste of social and/or collective resources;
8. The deliberate withholding, destruction or manipulation of information of the offences described under a. through g. above, or the threat thereof.

4. A suspected irregularity: an irregularity means an undesirable situation of a general, operational, procedural, or financial nature at CHOICE for Youth and Sexuality.
5. Informant: the current, or former, employee who reports suspected malpractice in accordance with this procedure.
6. The ED, or Executive Director: the person appointed as Executive Director.
7. The Board: The Board refers to the group of people appointed as members of the Board of CHOICE, as explicated in the organisation's by-laws. The Board is responsible for the strategic direction of the organisation, and oversees the work of the ED. The Board is represented by the Chair of the Board in the reporting procedures
8. Advisor: a person (either within the organisation or external) who is both trusted by the informant and capable of offering advice regarding the appropriate means of reporting the matter. Furthermore, the advisor can point out to the informant any risks involved. The advisor referred to in this regard is subject to a confidentiality obligation by virtue of his position. If necessary, the Confidential Advisor (*vertrouwenspersoon)* may assume the role of an advisor.
9. Confidential Advisor on Undesirable Behaviour, or Confidential Advisor: The person appointed by the director to follow a training in order to perform this role for CHOICE, and who is widely known within the organisation to hold the position. The Confidential Advisor provides a listening ear, advice and assistance to the informant on a confidential basis. The Confidential Advisor may monitor the process while offering the informant useful counsel. The Confidential Advisor is not part of the reporting authority itself, and therefore does not handle complaints, pass judgement, express opinions or impose sanctions personally. The Confidential Advisor is only accountable to the highest authority of the organization and does not give substantive account of individual cases.
10. The Integrity Coordinator: The Integrity Coordinator is an independent third-party service provider to whom complaints (see chapter 3) and reports can be submitted and who can, if needed, assist in investigating and handling the case.
11. The report: The report of a (suspected) case of malpractice or irregularity in accordance with this procedure. Reports cannot be submitted based on rumours or second-hand accounts.
12. Investigators: The Executive Director, the Supervisory Board or (a) member(s) of the investigation committee appointed to investigate the matter reported.
13. External third party: Any organisation or representative of an organisation which/whom, is judged by the informant to be capable of directly or indirectly stopping the suspected malpractice, and is therefore the most appropriate party to compile the external report on the suspicion of malpractice.
14. Whistleblowers Authority: The Whistleblowers Authority, as referred to in Article 1a of the Whistleblowers Authority Act. See also www.huisvoorklokkenluiders.nl.
15. Advisory department of the Whistleblowers Authority: The Authority's advisory department, as referred to in Article 1c of the Whistleblowers Authority Act.
16. Investigation department of the Whistleblowers Authority: The Authority's investigation department, as referred to in Article 1c of the Whistleblowers Authority Act.

Please Note: this procedure uses singular they as a singular referent pronoun.

## 4.3 SUPPORT OF THE EMPLOYEE AND/OR INFORMANT

1. The employee and/or informant may consult an advisor in confidence on the matter of suspected malpractice or an unlawful act and may also opt to be represented by said advisor.
2. In case of the suspicion of malpractice or an unlawful act, the employee and/or informant may request that the Confidential Advisor provide support and guidance to the informant during the said matter with a duty of confidentiality.
3. If the suspected malpractice is work related, the employee and/or informant may request that the Advisory Department of the Whistleblowers Authority provide the necessary information, advice and support in case of the suspicion of malpractice. The Whistleblowers Authority provides advice free of charge.

## 4.4 REPORTING

1. An employee who suspects malpractice or an irregularity at CHOICE may report the matter to the Executive Director. If the report of suspected malpractice relates to the director's performance and/or actions, then it should be submitted to the Board (internal reporting)
2. If for some reason you prefer not do this, you can also submit your question or raise your concern through our platform Choiceforyouth.trusty.report. The platform is operated by an

independent third-party service provider and if you prefer that, they will guarantee that your identity is kept confidential (external reporting)

3. Reporting concerns and asking questions are fundamental to following our Integrity Policy and Code of Conduct, to living up to our values and keeping a good reputation. It allows us to address the matter and correct the problem, if necessary.
4. The report can be submitted anonymously or may be dealt with anonymously at the informant's request, both when reporting internally and reporting externally. If a report is submitted anonymously, it is not possible to interview the informant directly. This implies that it will be more difficult to investigate the report.
5. The informant should act both in good faith and with due care, while the report cannot be submitted based on rumours or second-hand accounts.
6. An employee of another organisation, who encountered the employer's organisation while performing his duties, and who suspects malpractice within the latter, is entitled to submit a report in accordance with Article 4, paragraphs 1 through 5.

## 4.5. RECEIPT AND REGISTRATION OF REPORT

If the Executive Director or the Chair of the Board can answer the question or take away the concern immediately, there is no need for further action. However, in order to ensure that all signals of potential wrongdoing are duly noted, it may be considered to submit a report through our platform Choiceforyouth.trusty.report nevertheless. Questions or concerns which need to be investigated further have to be reported to The Integrity Coordinator through CHOICE@theintegritycoordinator.com.

As soon as a report is submitted to The Integrity Coordinator, the Executive Director of CHOICE will be notified and the Chair of the Board will receive a copy of the notification. If the person who has submitted the report has chosen to remain anonymous, The Integrity Coordinator will not reveal the identity of the reporter.

The Integrity Coordinator will however screen the report for implicated parties. If it would appear that the Executive Director or the Chair of the Board is implicated in the report, he, she or they will not receive a notification of the case and he, she or they will not have access to this case. In that instance, another Board member will be involved in the case to replace the implicated party.

Within 3 working days after submission of the complaint, the person who submitted the complaint will be informed that the question or concern has been received. It is also possible that the reporter will be asked to submit additional information.

The Integrity Coordinator will review the matter and propose the next steps to the Executive Director and Chair of CHOICE (or their replacement). Together they will discuss the nomination of an impartial (lead) investigator.

## 4.6. CONDUCTING INVESTIGATIONS

Each report will be taken seriously and investigated properly by an impartial investigator or a team of impartial investigators. The Executive Director and/or the Chair of the Board may involve other associates to assist in the investigation, as long as these associates keep all information confidential.

If CHOICE would lack the resources to investigate the case sufficiently or independently, the Executive Director or Chair of the Board may engage third party specialists to assist with the investigation. This has to be approved by a majority of the Board.

If necessary, the investigation may include that physical or digital files, including e-mail files, of an associate are searched, as long as these personal files reside on company property, like a company server, notebook or telephone. This step will not be taken lightly and requires the unanimous approval of the Executive Director, the Chair of CHOICE and a member of staff, preferably the trusted advisor (or their replacements in case any of these persons would be implicated in the case).

If an allegation has been made against an associate or a partner, and evidence is found to support the allegation, the associate or the partner will be given an opportunity to defend his or her case. If no evidence is found, the personal data will be removed from the case.

During the course of the investigation, we request all associates to cooperate with the investigation, though everybody also has the right to remain silent. In case that an associate is

interviewed, he, she or they has the right to request that a person (a counsellor) attends the interview on his/her/their behalf. This can also be a colleague, as long as this person is not implicated in the investigation.

## 4.7. CONFIDENTIAILITY

When you submit a question or a report, it will be handled in a confidential manner, with disclosure limited to enable CHOICE to conduct a full investigation of the alleged violation.

### 4.8. REPORTING THE OUTCOME OF THE INVESTIGATION

Within 90 days after the confirmation of the receipt of the report, The Integrity Coordinator will provide high-level feedback to the reporter about the progress of or the outcome of the investigation. It is possible that, at that time, the investigation is still continuing. In that case The Integrity Coordinator will keep the reporter informed about the progress. We aim to inform the reporter on a bi-monthly basis, but if that is not suitable, at least on a quarterly basis.

Once the investigation has been concluded, The Integrity Coordinator, the Executive Director and the Chair of the Board will discuss the outcome of the investigation. The Executive Director will propose to the Board how to address the matter. Potential measures for CHOICE associates may include:

- Further clarification of the Integrity Policy, the Code and the policies and procedures via communications or enhanced training
- A verbal or written warning
- Adverse performance evaluation
- Enforcement of a probation period of 6 months
- Suspension for a period of 3 months
- Termination of the employment contract, volunteer contract, or the contract for (consultant) assignments within a 1-week notice period
- Other disciplinary measures, as deemed appropriate
- Legal action
- Informing the relevant authorities

In addition to this, external partners may face:

- A temporary suspension of funding and/or other forms of contractual agreements
- Permanent termination of the partnership contract
- Temporary suspension of funding and/or other forms of contractual agreements
- Permanent termination of partnership contract
- Relevant legal action

As CHOICE does not hold mandate over external parties, the strongest course of action that can be taken by CHOICE are the aforementioned ones. ***All third parties must be made aware of this policy at the time of signing a contract or during partnership agreement talks by the CHOICE member responsible for that contract***

It is however also possible that the Executive Director and the Board conclude that there is insufficient evidence to support the case. The Board and the Executive Director, and if necessary in consultation with external experts or the integrity coordinator, will determine which measures will be taken.

The Integrity Coordinator will inform the person who submitted the report on the final outcome of the investigation (substantiated or not substantiated) on behalf of the Executive Director and the Board. If the report is not substantiated, the Executive Director and the Board will indicate the (high-level) reasoning behind that decision. The reporter will be given two weeks to respond to the decision and to submit additional evidence, if applicable. In case that the reporter feels that his or her concerns have not been properly addressed, the reporter can turn to the Dutch House for Whistleblowers. See: www.huisvoorklokkenluiders.nl for information in Dutch, and www.huisvoorklokkenluiders.nl/english for more information in English.

The outcome of the investigation will be put in writing. The report will describe the methodology used, the evidence that was found, the facts and circumstances, as well as the relevant laws, regulations, policies and guidelines. The Executive Director will add the corrective and preventive measures taken, if applicable. The file will be archived in a confidential way and be deleted when appropriate, in accordance with data protection laws.

## 4.9. LEGAL PROTECTION OF THE INFORMANT AND OTHER PARTIES INVOLVED

1. The legal status of an informant who reports suspected malpractice in good faith and acts responsibly, both in formal and substantive terms, is protected. This is understood to mean that the informant will not be disadvantaged in any way in relation to their position at CHOICE, as a result of having reported suspected malpractice.
2. Interferences with lawful employment and livelihood, if and insofar as these relate to the report of a reasonable suspicion of malpractice, covered by the protection referred to in point 1, are decisions aimed at:
   a. dismissal, other than at the employee's own request
   b. premature termination or non-renewal of a fixed-term employment contract
   c. failure to convert a fixed-term employment contract into a permanent one
   d. the reallocation or transfer of the employee, or rejection of a request to do so
   e. the imposed allocation of a different position
   f. the extension or restriction of duties, other than at the employee's own request
   g. taking disciplinary measures
   h. withholding a wage increase
   i. withholding a promotion
   j. refusal to grant leave.
3. Acting responsibly in a formal sense implies that:
   a. the informant first reported the matter in question internally, as referred to in Article 4 (internal reporting), unless they could not reasonably be required to do so as intended in this procedure.
   b. the informant discloses the matter in an appropriate and proportionate manner in an external report, as intended in this procedure.
4. Acting responsibly in a substantive sense implies that:
   a. the informant has reasonable grounds to assume that the matter in question occurred.
   b. it is in the public interest to report the matter externally as referred to in Article 2 (definitions) as the suspected malpractice places that defined in 2b at stake.
   c. the public interest in reporting the matter externally outweighs CHOICE' interest in it remaining confidential.
5. The employer shall not in any way disadvantage an employee who is interviewed by the investigators in order to make a statement in good faith.
6. The employer shall not in any way disadvantage an employee for having supplied the investigators with documents which they might reasonably assume to be relevant to the investigation.
7. The employer shall ensure that the informant's superiors and colleagues refrain from disadvantaging him/her in any way, because of having appropriately reported suspected malpractice or an irregularity in good faith, which might affect his/her professional or personal performance. This is understood to include at least the following:
   a. bullying, ignoring or excluding the informant
   b. making unsubstantiated or disproportionate accusations regarding the informant's performance
   c. imposing a ban of any kind whatsoever, which basically prevents the informant or his/her colleagues from participating in investigation, speaking out, entering the workplace and/or contacting other parties
   d. intimidating the informant by threatening to take certain measures or action if they proceed with the report.
8. The employer shall reprimand any employee who is found to have disadvantaged the informant in any way and may issue an official warning or impose disciplinary measures.

## 4.10. REPORTING AND ASSESSMENT

1. The Executive Director will draw up an annual report on policy relating to the handling of reports of suspected malpractice and irregularities and the implementation of this procedure. These annual reports should contain at least the following:
   a. information relating to policy pursued during the past year
   b. information relating to policy in this area to be pursued during the year ahead
   c. information relating to the number of reports submitted
   d. an anonymised indication of the nature of the reports
   e. an indication of the findings of the investigations and position of the employer, insofar as this can be provided while also safeguarding the informants' anonymity.
2. The Executive Director will submit a draft of the report referred to in the previous paragraph to be discussed by the Board, whereupon it shall be discussed at a consultation meeting with the Board.
3. Before publishing the report, the Executive Director will give the Board the opportunity to express its opinion regarding policy relating to the handling of reports of suspected malpractice and irregularities and the implementation of this procedure. The Executive Director bears responsibility to incorporate the Board's opinions in the report, and shall submit the finalised version to the Board for approval.

# CHOICE CHILD PROTECTION POLICY

## 5.1 INTRODUCTION

As a youth-focused development organization working internationally and whose work is underpinned by the United Nations Convention on the Rights of the Child (UNCRC), CHOICE for Youth and Sexuality (CHOICE) is committed to ensuring the fulfilment of children's rights including their rights to protection. CHOICE is committed to protecting children from harm and ensuring children's right to protection under Article 19 of the UNCRC is fully realised. We take seriously our responsibility to promote child safe practices and protect children from harm, abuse, neglect and exploitation in any form. In addition, we will take positive action to prevent those who abuse children from becoming involved with CHOICE and take stringent measures against any CHOICE Staff, Board, Volunteers, and Interns who abuse a child. Our decisions and actions in response to child protection concerns and breaches of this policy will be guided by the principle of 'the best interests of the child'. All persons acting on behalf of CHOICE need to sign and adhere to the code of conduct on child (under 18) and youth (15-24) safeguarding, using Annex 1.

## 5.2 DEFINITIONS UNDER THE CHILD PROTECTION POLICY

1. In line with the UNCRC, for the purposes of this policy, a child is defined as any person under the age of 18 years (UNCRC Article 1) and youth as any person between 15-24 years.
2. Child abuse is defined as all forms of physical abuse, emotional ill-treatment, sexual abuse and exploitation, neglect or negligent treatment, commercial or other exploitation of a child and includes any actions that result in actual or potential harm to a child. Child abuse consists of anything which individuals, institutions or processes do or fail to do, intentionally or unintentionally, which harms a child or damages their well-being, dignity and prospect of safe and healthy development into adulthood.
3. Child protection is defined in this policy as the responsibilities and preventative and responsive measures and activities that CHOICE undertakes to protect children ensuring that no child is subject to child abuse as a result of their association with us, their contact with CHOICE Staff, Board or Volunteers and/or their participation in any CHOICE activity, including our projects and programs. In addition, it incorporates our responsibility to ensure that where there are concerns over a child's welfare or where a child has been subject to child abuse, actions are taken to address this; concerns are reported and responded to appropriately and in line with the relevant global and local procedures; and incidents are analysed so as to ensure continued learning and growth in the field of organisational child protection.
4. CHOICE Staff and Interns refers to individuals who receive a regular salary for work in any part of CHOICE for Youth and Sexuality, including interns.
5. CHOICE Board members refers to anyone who is registered as a Board member of CHOICE through the Dutch Chamber of Commerce, either as member of the General Board and those that are members of the Advisory Board.
6. CHOICE Volunteers refer to those who voluntarily work for CHOICE and have signed a volunteer contract for this purpose (also known as Youth Advocates).
7. CHOICE Team refers to the full range of individuals working for CHOICE on a remunerated and voluntary basis, made up of the CHOICE Staff and Interns, CHOICE Board Members, and CHOICE Volunteers.
8. CHOICE Visitors refers to a range of persons who are visiting our programs and may encounter children through CHOICE, including journalists, media, researchers and celebrities.
9. CHOICE partners refer to any staff and/or representatives of Dutch and local partner organizations and local governments (when operating in partnership agreement with CHOICE).
10. CHOICE Associates refers to a range of paid and non-paid individuals who have committed to work with or support CHOICE. It includes, among others, sponsors; researchers; donors, consultants and contractors.

## 5.3 SCOPE OF THE CHILD PROTECTION POLICY

The Child Protection Policy applies to all individuals acting on behalf of CHOICE both abroad and locally. These individuals must comply with the requirements brought forth in this policy and understand the sanctions that may be applied for breaches of the policy. It is intended that this policy will set a minimum global standard for all CHOICE Team. Where required by law or local practices, CHOICE and CHOICE partner organizations may enhance the standards as set out in

this policy. This commitment will be evidenced through signing the Letter of Agreement to which this policy is an annex.[2]

## 5.4 PRINCIPLES

This policy is informed by a set of principles that are derived from the UNCRC and include:

1. All children have equal rights to protection from abuse and exploitation.
2. Each child has a fundamental right to life, survival and development. CHOICE's youth-centred development approach provides a basis for ensuring the realisation of children's rights to be protected from harmful influences, abuse and exploitation.
3. All children should be encouraged to fulfil their potential, and inequality and discrimination should be challenged.
4. We will not discriminate against the child. The child will be treated with respect irrespective of gender, nationality or ethnic origin, religious or political beliefs, age, physical or mental health, sexual orientation, gender identity, gender expression, family, socio-economic and cultural background, or any history of conflict with the law.
5. Everybody has a responsibility to support the care and protection of children.
6. CHOICE has particular responsibilities to children who come into contact with us. No child must come to harm (as defined in number 2) as a result of their engagement with CHOICE as a participant in a CHOICE program or as part of any CHOICE fundraising or advocacy campaign. These responsibilities extend to those individuals or organisations who are associated with CHOICE. Therefore, everyone working for or associated with CHOICE's work must be aware of and adhere to the provisions of this policy. Partner organisations who have not complied with this policy will be held accountable.

## 5.5 CHOICE'S VISION FOR CHILD PROTECTION

This policy aims to ensure that the CHOICE Team, CHOICE Partners, and CHOICE Associates are skilled, confident, understand, accept and are well supported in meeting their child protection responsibilities and engage positively with children and communities in ways that enhance the achievement of CHOICE's overall program goals and commitments.

## 5.6 RESPONSIBILITIES FOR THOSE COVERED BY THE SCOPE OF THE CHILD PROTECTION POLICY

Everyone who works with and engages with CHOICE has a responsibility to ensure that children are protected. The responsibilities detailed below are mandatory for those who fall within the scope of the policy.

CHOICE Team, CHOICE Partners, and CHOICE Associates:

1. Never abuse and/or exploit a child or act/behave in any way that places a child at risk of harm.
2. Report any child abuse and child protection concerns they have by using the form in Annex 2 and report your concerns to the Executive Director.
3. Cooperate fully and confidentially in any investigation of concerns or allegations of child abuse.
4. Contribute to building an environment where children are respected and encouraged to discuss their concerns and rights.
5. Always treat children in a manner which is respectful of their rights, integrity and dignity, considers their best interests and does not expose them to, or place them at risk of, harm. For example: when taking images/pictures during visits, interacting with children or generating stories of children, ensure that this is done in a manner consistent with the appropriate CHOICE policies and procedures.
6. Never disclose, or support the disclosure of, information that identifies children, through any medium, unless that disclosure is in accordance with standard CHOICE policies and procedures and/or has the explicit consent from the child's family. Media include paper, photographs and social media.
7. Never make any contact with a child associated with CHOICE's work that is not supervised by a (or another) member of CHOICE Staff. Such contact may include but is not limited to visits and any form of communication via social media, emails and letters.

CHOICE Staff in particular must:

[2] This applies to all LoAs signed from 6 April 2020 on. Contracts signed beforehand are exempt, but will be covered by this obligation if renewed.

1. Ensure that each CHOICE entity, including partner organizations, has in place local procedures that are consistent with this Child Protection Policy. Local procedures should be developed with the assistance of local advisers in accordance with local law. It should also be ensured that this policy and local procedures are made available in local languages and child-friendly formats
2. Ensure that CHOICE Staff who have reported child protection concerns or are accused of Child abuse are given appropriate care, support and protection in dealing with all aspects of the case including any safety concerns and potential reprisals which may arise from the incident or from the reporting of such concerns.
3. When engaging with a child or youth over a longer term, for example as participants in a training by CHOICE, or as CHOICE's invitees to an (international) event, they shall take the following measures before hand:
    - Coordinate among staff to draft a simple risk assessment highlighting possible risks and mitigation measures. (Template provided)
    - Take informed consent from the youth directly considering that they are over 18; or their parents when below 18.
    - Ensure that they receive an safeguarding induction with CHOICE's integrity policy, highlighting the code of conduct, child protection policy and the reporting procedure.
    - Ensure that we have emergency contacts and that there is an identified safeguarding point of contact, while ensuring their awareness of the reporting channels; and
    - If there are any online activities, outline other possible safeguarding measures.

## 5.7 PERSONAL CONDUCT OUTSIDE WORK OR ASSOCIATION WITH CHOICE

CHOICE Staff, CHOICE Board and CHOICE Volunteers are required to bear in mind the principles of the Child Protection Policy and heighten their awareness of how their behaviour may be perceived both at work and outside work.

## 5.8 IMPLEMENTATION, MONITORING AND SANCTIONS

The Board of CHOICE is ultimately accountable for this policy. The Executive Director of CHOICE, in cooperation with other staff members, is responsible for its implementation.
The monitoring of adherence to this policy is made through CHOICE's Code of Conduct by all parts of CHOICE.
For effective implementation of the Child Protection Policy, it needs to be understood accurately by all those that the policy applies to. CHOICE will ensure that all its staff, interns, volunteers, consultants, etc. are informed about this policy and act in accordance with all its provisions and do no harm to children who may come into their contact within or outside their work.
The Child Protection Policy will be sent to all those part of the CHOICE Team after they start their involvement with CHOICE.
All CHOICE Team members should be alert to signs that may suggest a child is in need of help (see annex 3). Deciding whether to report can be a very difficult responsibility, but everyone is encouraged to speak out even when in doubt or only suspecting possible harm. The reporting procedure is made widely available (chapter 4 in this document) to ensure that everyone is clear what steps to take regarding the safety of children and other witnesses.
All witnessed, suspected or alleged violations of CHOICE's Child Protection Policy will be immediately reported to the Executive Director – using the safeguarding reporting form (annex 2) or by following the CHOICE Reporting Procedure. The guiding principle here is that the safety of the child is always the most important consideration. These records will be stored securely with access limited to the contact person.
The first stage is to decide whether the reported concerns are internal to the organisation or relate to an external situation.

**If the concern is internal** – regarding the behaviour of staff, volunteers, interns, the need to report it to local/national authorities should be considered. If it is not reported, the internal safeguarding procedure needs to be applied. If the behaviour is deemed necessary to report, a report should be made to the designated authorities and actions taken by the authorities should be followed-up on to decide on further response and record the case and the actions taken.

**If the concern is external** - meaning that there is concern regarding abuse outside the organisation, it should be considered whether the concern is due to the way the organisation is delivering business. It should then be decided whether reporting to local or national authorities is necessary. After this the same procedure as for internal concerns is applied.
The Executive Director will act on the concerns or allegations in a confidential manner in accordance with the standardized process developed by CHOICE in the best interests of the child, irrespective of the nature of the referral, who the allegations are about or who the referrer is or where they are from. The contact person will take appropriate action to protect the child/children in question from further harm and during and following an incident or allegation. An assessment of the specific kind of support and assistance that is needed by the child(ren) affected by the incident will be immediately be offered. This may also involve arranging a medical assessment.
A safeguarding report (annex 2) must be compiled to document details of the incident. The "best interests of the child" must be considered throughout the process.
An assessment of the specific kind of support and assistance that is needed by the children affected by the incident will be offered.

## 5.9 IMPLEMENTATION STRATEGY: THE INTERNAL SAFEGUARDING PROCEDURE

CHOICE will immediately take action should any employee, volunteer, intern, board member, consultant, adviser being alleged to have violated the Child Protection Policy, suspending them from their functions completely pending the outcome of the investigation. CHOICE reserves the right to take any disciplinary action against any of the above who have been proven guilty in an investigation, which may include reporting the incident to the police or relevant authorities.
The investigation completed by the Executive Director will be submitted to the Chair of the Board who will together come to a decision about action to be taken. Decisions from any investigation will be confirmed in writing to the individual concerned.
Acts of a criminal nature will be referred to the police and/or Children's Welfare Services in the Netherlands and may result in a criminal investigation and conviction.
When investigating concerns or complaints, the process should be always be fair and, where complaints are upheld, the individual will have the right to appeal the decision. In such instances, the individual must write to the Chair of the Board within one week of receiving written confirmation of the complaint outcome, explaining the grounds for appeal. The Chair will consider the appeal, which will include re-examining the evidence and reports and may include talking directly to staff and others involved. CHOICE's Chair will come to a final decision consulting all Board and Advisory Board members, which will be confirmed in writing. The decision from the appeals process is final.
In cases where staff from CHOICE partner organizations or accompanying adults with children are alleged to have violated CHOICE's Child Protection Policy in meetings and activities organised by CHOICE, this needs to be reported to the Executive Director. The Executive Director will investigate the complaint(s) or concerns confidentially and discreetly and report this to the Chair of the Board. Where possible CHOICE's Executive Director together with the Chair of the Board will discuss the concerns with the responsible person and/or his/her organisation in order to change the behaviour or acts of the concerned person/organisation. In case the person or organisation is not able or willing to change its behaviour according to the standards of CHOICE's Child Protection Policy, the Executive Director will report this to the Chair, which may decide to suspend further cooperation with this organisation when directly involving children or end the contractual relationship.
The partner organisation has the right to appeal to the Chair's decision. In such instances, the organisation must write to the Board of CHOICE within a week of receiving the written confirmation of the complaint outcome, explaining the grounds of appeal. The Board of CHOICE will consider the appeal, which will include re-examining the evidence and reports and may include talking directly to staff and others involved. CHOICE's Chair will come to a final decision, which will be confirmed in writing. The decision from the appeals process is final.
In cases of acts of a criminal nature committed by CHOICE's member organisations in relation to activities organised by CHOICE this will be referred to the police.

## 5.10 ACCOUNTABILITY: MONITORING AND EVALUATION OF THE CHILD PROTECTION POLICY

The aim of monitoring and evaluating the Child Protection Policy is to learn from practical case experiences, which will contribute to inform policy reviews and changes to the Child Protection Policy.
The CHOICE Board will regularly monitor the implementation of its Child Protection Policy and procedures. Progress, performance and lessons learned are reported by the Child Protection contact person, Executive Director, to the Board annually and included in CHOICE's annual reports. Monitoring and evaluation, for which the Executive Director and the Board are responsible, will be conducted annually by checking whether the standards from the Child Protection Policy are implemented and whether safeguards are working. This will be done by carrying out a survey among the CHOICE Team on how the standards from the Child Protection Policy are being met, how effective they are and what needs improving.
Next to the overall monitoring and evaluation of the Child Protection Policy, reactive monitoring will take place, after incidences have occurred, which will contribute to a learning process for CHOICE and if necessary, changes to the Child Protection Policy or reporting procedures.

# CHOICE SEXUAL HARASSMENT POLICY

## 6.1 POLICY STATEMENT

CHOICE for Youth & Sexuality is committed to providing a safe environment for all its employees, volunteers and board members. It needs to be free from discrimination on any ground and from harassment at work including sexual harassment. CHOICE will operate on a strict enforcement of relevant and necessary sanctions (listed below) for any form of sexual harassment in the workplace and outside it at CHOICE related (and/or funded) events, workshops and other travels. CHOICE will treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person affiliated with CHOICE for whom this policy stands applicable found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

## 6.2 DEFINITIONS UNDER THIS POLICY

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

*Physical Misconduct*

- Unwelcome non-consensual physical contact including patting, pinching, stroking, kissing, hugging, fondling and/or touching.
- Physical violence, including that of a sexual nature, also including sexual abuse and exploitation.
- The use of job-related threats or rewards to solicit sexual favours and influencing power as a form of bullying, threats or holding to ransom.

*Verbal Misconduct*

- Unwelcome sexual comments, stories and/or jokes. Repeated comments on someone's appearance, age, private life etc. after explicit calls to stop.
- Sexual advances or explicit communication in person, or via phone, messaging apps and/or other online forms of communication.
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults that find their basis in the sexual orientation, gender identity and expression and sex characteristic of an individual.

*Non-Verbal Misconduct*

- Display of unwanted sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling and/or leering

The **victim** is any person who has been on the receiving end of unwanted misconduct. The **harasser** is the person against whom the complaint has been lodged by the victim.
Anyone can be a **victim** of sexual harassment, regardless of their SOGIESC and that of the **harasser**. What matters is that the sexual conduct is unwanted and unwelcome by the person that the conduct is directed towards.

## 6.3 PRINCIPLES

CHOICE recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the work environment, for example between manager or supervisor and employee, or an adult and young person. Anyone, including employees of CHOICE, volunteers, members of the (advisory) board, who sexually harasses another will be reprimanded in accordance with this internal policy. CHOICE expects similar respect and standards as set in this policy to be upheld by external contractors and visitors. In the case of a case of harassment

(sexual and otherwise) by an external party towards an internal CHOICE associate, the same complaints procedure can be utilized by the CHOICE associate. Sanctions for external parties differ from those for internal ones and are listed below.

All sexual harassment is prohibited whether it takes place within CHOICE's premises or outside, in person or online, including at social events, business trips, training sessions, or conferences sponsored completely or in part by CHOICE.

## 6.4 PROCEDURES & RESPONSIBILITIES SET OUT UNDER THIS POLICY

*Complaints Procedure*

Anyone who is subject to sexual harassment should, if possible, inform their alleged harasser that the conduct is unwanted and unwelcome. CHOICE recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and their employee) and that it may not be possible (due to feelings of discomfort, fear of unfair reprisal such as loss of employment etc.) for the victim to inform their alleged harasser. If a victim cannot directly approach an alleged harasser, they can approach the Confidential Advisor on Undesirable Behaviour and Integrity (henceforth Confidential Advisor) who can advise, assist and support the victim, a member of the Board or the Executive Director. Victims can also lodge a formal complaint right away (anonymous if desired) via the platform Choiceforyouth.trusty.report.

They provide the victim with two options: lodge a formal complaint and starting the complaints procedure according the CHOICE Individual Complaints Policy and Procedure (see chapter 3 of this document), or use the informal Complaints Mechanism for Sexual Harassment (detailed below. The confidential advisor can continue to advise, assist and support the victim throughout these procedures.

*Informal Complaints Mechanism*

If the victim wishes to deal with the matter informally, the Confidential Advisor and the Executive Director form a committee (The Chair of the board replaces the ED if the informal complaint concerns the ED) that will:

1. give an opportunity to the alleged harasser to respond to the complaint
2. ensure that the alleged harasser understands the complaints mechanism
3. at the request of the victim, facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a mediator (preferably from within the designated persons) within the organization to resolve the matter
4. ensure that a confidential record is kept of what happens. The ED can consult with the Chair of the board (informal and confidential)
5. follow up after the outcome of the complaints mechanism to ensure that the behavior has stopped
6. ensure that the above is done speedily and within 14 days of the complaint being made. If the alleged harasser is not in available in this period, the 14 day period begins from when they are.

## 6.5 ADDITIONAL PROVISIONS

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In the case of sexual harassment, two additional measures are taken on top of the ones outlined in the Individual Complaints Policy and Procedure:

1. Follow up to ensure that the recommendations are implemented, that the behavior has stopped, and that the victim is being supported in dealing with the event.
2. Make recommendations to ensure proper functioning of the workplace, in consultation with the victim, if it cannot be determined for certain that the harassment took place.

*External Complaints Mechanisms*

A person who has been subject to sexual harassment can also make a complaint outside of CHOICE. Such complaints can be made to any third party that the victim sees fit. Depending on the situation, the status and outcomes of the internal complaint's procedures, CHOICE may or may not support the victim in this process. This is to ensure fairness and an unbiased outcome for all parties involved in the process, including the alleged harasser.

The victim can approach CHOICE for recommendations on whom to contact externally, such as the Ministry of Foreign Affairs, Dutch Police, Centre for Sexual Violence.

## 6.6 IMPLEMENTATION OF THIS POLICY

CHOICE will ensure that this policy is widely disseminated to all relevant persons. It will be included in the integrity policy and as such be attached to the terms of employment t. All new employees must be made aware of the content of this policy as part of their induction into the organization. For volunteers, this policy is included in the introduction manual and they are made aware of it and its contents during the introduction period. It is the responsibility of the Board of CHOICE to ensure that all internal CHOICE associates are aware of the policy. The staff of CHOICE is responsible to ensure that all CHOICE partners and other external affiliates are aware of the policy.

## 6.7 MONITORING AND EVALUATION

This policy will be monitored and reviewed. The Board of CHOICE is responsible for managing and maintaining this policy. The Board as well as the Executive Director are accountable for ensuring that their functional team understands and adheres to this policy in their day-to-day work. If compliance issues surface, they will work with team members to address these issues promptly. Any updates/revisions to the policy must be endorsed by the Executive Director and the Board of CHOICE before their approval. As part of the annual review and reflection process, CHOICE will reflect on the lessons they learned from the complaints (if any) and the constructive feedback they received. A key input into this annual review process will be the completed and anonymized Complaints Log.

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[3] This applies to all contracts signed from 6 April 2020 on. Contracts signed beforehand are exempt, but will be covered by this obligation if renewed.

# ANNEXES TO THE INTEGRITY POLICY

## ANNEX 1: STATEMENT OF COMMITMENT TO CHOICE'S CHILD PROTECTION POLICY

I,_____, have read and understood the standards and guidelines outlined in this Child Protection Policy. I agree with the principles contained therein and accept the importance of implementing and promoting the child protection policies, procedures and practices contained within this document while working or associated with CHOICE.

I further understand that adherence to CHOICE's Child Protection Policy will involve the following: undergoing a check for criminal convictions related to working with children; signing a personal declaration stating any criminal convictions, including those considered 'spent'; declaring any previous investigations or allegations made against me with respect to child protection issues.

_____(Name)
_____(Job title/role)
_____(Signature)
_____(Date)

## ANNEX 2: SAFEGUARDING REPORT FORM

If you have knowledge that a child might be at risk of harm, please complete this form to the best of your knowledge. Please note that child protection concerns must be reported (orally or in writing) directly to the Executive Director/Chair of the Board of CHOICE (preferably within the same working day) – depending on the urgency, you may wish to complete this form before contacting the contact person or you may wish to complete the report afterwards.

Also use this form to report an accident or incident. An accident is an unplanned event that results in an injury or could have resulted in an injury or results in damage to equipment or property OR harm to the environment. An incident is an unpleasant or unusual event.

The report should be written and signed only by you to guarantee confidentiality. It should be sent only to the Executive Director, who will hold it in a safe and secure place and treat it with the strictest confidentiality.

Regarding GDPR, the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a condition that allows the sharing of information without consent. It states that information can be shared legally without consent, if one is unable to or cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk. Relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being. Thus, base your judgement on the facts of the case to gauge the amount of information that should, and therefore can legally, be shared.

**1. About you**

Your name: _____
Your job title: _____
Organisation you work for: _____
Nature of your contact with the child: _____
Contact details:
Tel:_____
E-mail: _____

**2. About the child**

Child's name: _____
Child's gender: _____
Child's age: _____
Child's address: _____
Child's parents/guardians: _____
Has any treatment been given to the child?
Treatment given by
_____
Taken to hospital YES_____; NO_____;
If yes, which hospital and how taken
_____

**3. About your concern; Details of incident**

Was the incident:
Observed by you Suspected Disclosed by someone else
If the concern was shared by someone else, please state who and their relationship to the child:
_____
What happened? Give cause (how and why) if known - If you include personal observations please make a distinction between what is a fact and what is opinion or hearsay (e.g. child's emotional state, visible injuries, etc.):
_____
_____
_____
_____
_____
_____
Did the child/young person or another source say anything to you [if relevant] and how did you

respond to him or her: [Do not lead the child. Record actual details]

_____
_____
_____
_____
_____

Date of the alleged incident: _____
Time of the alleged incident: _____
Location of the alleged incident: _____
Name of the alleged perpetrator (if applicable): _____
Were there any other children/people involved in the alleged incident? _____
Are any other children at risk of harm? _____

Action taken by you:

_____
_____
_____
_____
_____

Signature: _____

Date: _____

## ANNEX 3: RECOGNISING SIGNS OF ABUSE

Recognising indications of potential abuse is complex and there is no simple checklist, which allows easy recognition. There are potential warning signs that you can be alert to but they should be assessed with care. It should not be automatically assumed that abuse is occurring. Equally, however, it is important not to dismiss your concerns or ignore any signs of abuse – these should be discussed with the contact person (i.e. the Executive Director) as soon as possible to help decide the most appropriate course of action.

| | |
|---|---|
| Possible signs of physical abuse:<br>• Bruises, burns, sprains, dislocations, bites, cuts<br>• Improbable excuses given to explain injuries<br>• Refusal to discuss injuries<br>• Withdrawal from physical contact<br>• Arms and legs kept covered in hot<br>• weather<br>• Unwillingness to participate in physical activities that may involve undressing, e.g. sports<br>• Fear of returning home or of parents being contacted<br>• Showing wariness or distrust of adults<br>• Self-destructive tendencies<br>• Being aggressive towards others<br>• Being very passive and compliant<br>• Chronic running away | Possible signs of neglect:<br>• Frequent hunger<br>• Taking scraps of food from bins or plates, or stealing food<br>• Poor personal hygiene<br>• Constant tiredness<br>• Inappropriate clothing, e.g. summer<br>• clothes in winter<br>• Frequent lateness or non-<br>• attendance at school<br>• Untreated medical problems<br>• Low self-esteem<br>• Poor social relationships<br>• Compulsive stealing<br>• Drug or alcohol abuse |
| Possible signs of emotional abuse:<br>• Physical, cognitive or emotional development is delayed<br>• Highly anxious<br>• Showing delayed speech or sudden<br>• speech disorder<br>• Fear of new situations<br>• Low self-esteem<br>• Inappropriate emotional responses<br>• to situations<br>• Extreme passivity or aggression<br>• Drug or alcohol abuse<br>• Chronic running away<br>• Compulsive stealing | Possible signs of sexual abuse:<br>• Age inappropriate sexualized behaviour or highly sexualized language<br>• Bed wetting or soiling<br>• Anal or genital soreness<br>• Sleep problems<br>• Fear of being with adults<br>• Promiscuity<br>• Extreme risk taking in adolescents |

Possible signs of concern regarding adult behaviour:

- A person in whose presence the behavior of a child significantly changes such as becoming withdrawn, fearful, distressed or agitated
- Asking a child to lie or keep secrets
- Breaches of the organisation's Code of Conduct/behaviour protocols
- Initiating private contact with a child, in person or by e-mail or phone

*Source: Eurochild's Child Protection Policy*