

1. OVERVIEW

1.1. Purpose

1.1.1. Safeguarding children and adults affected by our work is foundational to all CGE activities, programmes, and projects. Central to everything we do is our commitment to do no harm to any child anywhere nor to adults living where CGE is active. We uphold the best interests¹ of children as a primary consideration in all actions and decisions.

1.1.2. Safeguarding includes preventing, reporting, and responding to harm or abuse caused by CGE employees and affiliates of children and of adults living where CGE is active.

1.1.3. CGE is committed to continuous improvement of safeguarding efforts which emphasises prevention of sexual exploitation and abuse (PSEA) and other forms of violence or harm. We abhor any misuse of power, status, or trusted position for any sexual or other exploitative purposes. We endeavour to tackle this root cause of abuse in our prevention and training efforts.

1.1.4. CGE has zero tolerance towards incidents of violence or abuse against children or adults, including sexual exploitation or abuse, committed either by employees or others affiliated with our work. CGE takes necessary actions to respond to any suspected or known instances of abuse. Incident responses are centred on the child or adult survivor, prioritising their interests.

1.1.5. This Policy continues to emphasise the unique vulnerabilities and special protection requirements for children, along with the importance of preventing sexual exploitation and abuse (SEA), in particular, among other forms of abuse of adults living where CGE is active.

1.2. Scope

1.2.1. This Policy applies to all CGE entities, including but not limited to the CGE office as well as its Board as well as any and all future secondary offices and advisory councils. References herein to “CGE” shall be understood as including all of these entities, unless the specific language or context clearly indicates otherwise.

1.2.2. This Policy is focussed on protecting all children anywhere from harm caused by CGE employees and affiliates and protecting adults from harm caused by CGE employees or affiliates as part of CGE programme presence.

1.2.3. This Policy applies equally in emergency relief and development aid programmes, as well as advocacy and fundraising activities.

1.3. Effective Date: This Policy took effect on 01 December 2022.

1.4. Contextualisation

1.4.1. The CGE Board and CGE main office in Erfurt are responsible for ensuring the development, implementation and periodic review of contextualised safeguarding policies, which are to be consistent with the standards outlined in this document and in accordance with local laws (and which could consist of simply deciding to utilise this Policy as their applicable policy on safeguarding).

¹ Convention on the Rights of the Child, General Comment 14:
http://www2.ohchr.org/English/bodies/crc/docs/GC/CRC_C_GC_14_ENG.pdf

2. POLICY

2.1. Safeguarding Policies and Responsibilities

2.1.1. Development of Contextualised Safeguarding Policies: Offices must contextualise the policy and update it on the regular schedule of policy review, per section 1.4 above.

2.1.2. Relevant CGE Employees, Interns, Volunteers, Board/Advisory Council members and other affiliated people: CGE equips all employees, interns, volunteers, and Board/Advisory Council members to understand and perform their safeguarding responsibilities and obligations. CGE also applies appropriate standards to external parties, including visitors, community volunteers, contractors, partners, and others affiliated with partners or contractors, to address safeguarding risks relating to their engagement with CGE's work. Hereafter, the full range of people for whom all or some of this Policy are relevant (either directly or through contractual arrangements) will be referred to as 'CGE employees and/or affiliates'.

2.1.3. Signed Acknowledgement: All CGE employees, volunteers, interns, and Board/Advisory Council members sign an acknowledgement that they know, understand and will follow this Partnership Management Policy on Child and Adult Safeguarding or local Safeguarding Policy. Signed agreements are kept on file by the relevant office. Individual employees or subcontractors of Contractors and Partners as defined below also acknowledge safeguarding policies, and these signatures are held by the Contractor or Partner.

2.1.4. Agreements with Contractors: Contractors engaged in contracts where they—or their employees or subcontractors—may have access to children or adults in CGE programmes, or may have access to identifiable personal data about such children or adults, require the safeguarding language below (or language substantively the same) in their contract with CGE. In addition, a copy of the Safeguarding Behaviour Protocols must be attached to the contract. These requirements apply whether the Contractor is being paid for the services or is providing them for free ('pro bono'), and is irrespective of the duration of the contract. 'In the course of performing this contract, Contractor and Contractor's employees will ensure that:

1. Any of their interactions with adults living where CGE is active, with children, or with identifiable personal data about such persons, will comply with this policy, and with any other reasonable safeguarding measures that CGE may specify;
2. Any incidents of harm or risk of harm to any child or to adults living where CGE is active will be reported immediately to CGE;
3. Any individuals with access to adult programme participants, to children, or to identifiable personal data about such persons, will have a current clean criminal background check for offenses against children or abuse of adults, to the extent permitted by law (evidence of which will be provided to CGE upon request);
4. They do not use children for labour; and
5. These safeguarding obligations will be clearly communicated to, and acknowledged by, all employees who may have access to children or to adults living where CGE is active, or to identifiable personal data about such persons, and will be extended in identical form to any subcontractors (if any are authorised) engaged to perform this contract.'

2.1.5. Agreements with Partner Organisations: When engaging a partner for a CGE programme or programme activity, CGE must assess the capability of the Partner to fulfil safeguarding

responsibilities, including the Partner's safeguarding policy, procedures, and implementation. CGE must then either (a) approve or (b) develop a capacity building plan and support the Partner to develop stronger safeguarding controls.

a. The agreement (whether referred to as an 'agreement', 'subgrant', 'Memorandum Of Understanding', or any other term) must specify that before the Partner begins any work on the project, CGE will conduct this assessment and approve or support the Partner as appropriate.

b. The Partner can agree to follow CGE's local Safeguarding Policy in carrying out the programme activities.

c. The agreement must ensure that any of the Partner's personnel working in the CGE project will have a current clean criminal background check for offenses against children or abuse of adults, to the extent permitted by law (evidence of which will be provided to CGE upon request).

2.1.6. Training: All CGE employees, volunteers, interns, and Board/Advisory Council members, as well as partner employees or partner volunteers working within a CGE project, receive safeguarding training within 90 days from the start of employment or CGE affiliation.

a. CGE employees and volunteers receive periodic refresher or other safeguarding training at least once every two years thereafter. Board/Advisory Council members receive refresher training on re-election (see section 2.10).

2.1.7. Safeguarding Staffing: The CGE main office in Erfurt and any future secondary offices appoint a Safeguarding Lead to provide leadership to the implementation of this Policy.

a. Humanitarian/Emergency responses which are declared a Category 3 response appoint their own Safeguarding Focal Point.

b. The Lead has a mandate for direct access to the CGE Chairperson, should he/she feel that safeguarding issues are not being addressed adequately.

2.2. Behaviour Protocols

2.2.1. Safeguarding Behaviour Protocols: CGE employees and affiliates behave in ways that safeguard all children everywhere and adults living where CGE is active, prevent sexual exploitation and abuse, and prevent any other intentional or unintentional harm to the people CGE serves or works amongst.

2.2.2. Rules of behaviour are based on local and culturally appropriate interactions (provided these meet or exceed the minimum protocols below) with children, members of the opposite sex, and other adults living in the programming area, and are included in each contextualised Safeguarding Policy.

Acceptable Behaviour – CGE employees and affiliates:

a. create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of these Behaviour Protocols;

b. are careful about perception and appearance in their language, actions and relationships with children and with adults living where CGE is active. Their behaviour—including in person and on

digital platforms, both online and offline— demonstrates a respect for children and adults and their rights;

- c. ensure that all physical and online contact with children and programme participants is appropriate in the local culture;
- d. use positive, non-violent methods to manage children's behaviour;
- e. accept responsibility for personal behaviour and actions as a representative of the organisation;
- f. are always accountable for their response to a child's behaviour, even if a child behaves in a sexually inappropriate manner; adults avoid being placed in a compromising or vulnerable position with children;
- g. where possible and practical, follow the 'two-adult' rule while conducting CGE work, wherein two or more adults supervise all activities that involve children, and are visible and present at all times;
- h. comply with safeguarding-related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation;
- i. comply with applicable data privacy laws and with relevant CGE data privacy and information security policies, including CGE digital child safeguarding protocols, when handling any personal data about individual children or adult programme participants, and that such data must be maintained and transferred in a secure, confidential manner;
- j. immediately report through established reporting mechanisms any known or suspected safeguarding incident or breach of this Policy by a CGE employee or affiliate, or a humanitarian aid worker² from any other agency (See Section 2.6.5 on how to report.).

Unacceptable Behaviour – CGE employees and affiliates do not:

- a. behave in an inappropriate physical manner or develop a sexual relationship with a child (under 18 years old), regardless of the country specific legal age of consent or age of majority. This includes consenting or condoning the above behaviour (including fostering or condoning child marriage, i.e. under 18 years old). This also includes behaviour that could be seen as grooming a child for a future inappropriate relationship;
- b. develop or seek a sexual relationship with any adult living where CGE is active. Such relationships, based on inherently unequal power dynamics, undermine the credibility and integrity of CGE's humanitarian aid or development work;
- c. sexually exploit or abuse any adult living where CGE is active or any child;
- d. exchange money, employment, goods, or services for sex (including sexual favours, other forms of humiliating, degrading, or exploitative behaviour, or hiring sex workers) or other exploitative demands. This includes exchange of assistance that is already due to programme participants;
- e. communicate with a child in CGE's programme areas via digital platforms (e.g. Facebook, Twitter), via mobile technology (e.g. texting, WhatsApp, Skype), or online without consent and knowledge of

² "Humanitarian aid worker" includes all paid employees, volunteers, contractors, and other affiliates of organisations providing emergency relief or development aid. Such organisations include UN agencies, INGOs, LNGOs, and CBOs

his/her parents. Further, CGE employees or affiliates never communicate on mobile, digital or online platforms with children or adult programme participants in ways that are inappropriate or sexual;

f. fondle, hold, kiss, hug or touch any child, or any adult living where CGE is active in an inappropriate or culturally-insensitive way;

g. use inappropriate or abusive language with a child nor an adult living where CGE is active, for example language that causes shame or humiliation, or is belittling or degrading;

h. spend excessive or unnecessary time alone with a child or adult programme participant, away from others or behind closed doors or in a secluded area;

i. condone or participate in behaviour which is illegal, unsafe or abusive; including harmful traditional practices, spiritual or ritualistic abuse;

j. hire children in any form of child labour (including as “house help”) unless it is within the best interest of the child and in alignment with local law and international standards (‘Child labour’ is work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling. ‘Child work’ in contrast may be beneficial if it meets International Labour Organisation (ILO) Conventions and puts the child’s interests ahead of any benefits gained by adults³);

k. hit or use other corporal punishment against a child while the child is in CGE care or the CGE employee or affiliate is conducting CGE’s work;

l. take a child alone in a vehicle for CGE work, unless it is absolutely necessary, and with parental/guardian and managerial consent;

m. misuse or be careless with personal data about individual children or adult programme participants;

n. stay silent, cover up, or enable any known or suspected safeguarding incident or breach of Safeguarding Policy by a CGE employee or affiliate;

o. exchange inclusion in CGE programmes or benefits for any kind of favour from a member of the community, as this is an abuse of power.

The above list provides concrete examples but is not exhaustive of all behaviours that constitute a violation of this Policy.

2.2.3. Disciplinary Action: The following are grounds for discipline, up to and including termination of the employment or other affiliation with CGE:

a. Failure to follow CGE Safeguarding Behaviour Protocols;

b. Failure to follow any other part of the CGE Safeguarding Policy;

c. Other inappropriate behaviour toward any children or any adults living where CGE is active;

d. Failing to report a known or suspected safeguarding incident committed by a CGE employee or affiliate; or

³ See ILO Conventions 182 and 138 and consult local legal counsel to determine appropriate parameters of ‘child work’ in your CGE country office; include these details in your contextualised policy.

e. Interference with any investigation or inquiry into a possible policy violation. Individuals who have been found to have breached this Policy may have “Do Not Rehire” placed on their personnel file. Partners and Contractors may have “Do Not Re-engage” placed on their file based on the nature of the case.

2.3. Recruitment

2.3.1. Screening: CGE takes diligent measures to screen out all people who might seek to use CGE to harm children or adult programme participants, or whose past actions indicate an unacceptable risk of such harm.

a. These measures include but are not limited to addressing safeguarding in job advertisements (when feasible), applications, interviews and references. Safeguarding screening measures are applied to all candidates for employment, Board/Advisory Council members, volunteers, interns and individual contractors who will have access to children or adult programme participants or to their identifiable personal data.

b. During the interview process, applicants are asked about previous work with children.

c. For references supplied by applicants, questions are asked regarding the suitability of the candidate to work with vulnerable adults and children or for a child-focused agency. Documentation of references is kept on file.

d. Screening of internal candidates includes reference checks and review of their personnel file for any previous infractions while working with CGE.

Note that major grant donors may have specific screening requirements for work they fund, so relevant grant terms and regulations should be checked.

2.3.2. Identity and Criminal Background Checks: Candidates for employment, Board/Advisory Council members, volunteers, and interns—as well as relevant personnel of contractors and partners—have an identification check and an appropriate criminal record/police background check, to the extent permitted by law, prior to employment or engagement with CGE, and periodically thereafter as required by law or appropriate for the context. Formal exemption approval is required for alternatives to police background checks in contexts where they are not feasible or trustworthy or lawful. People with a prior conviction for any crime against children or sexual exploitation or abuse against an adult are not hired or engaged by CGE, to the extent permitted by applicable law, and in any case will not be placed in a position with access to children or adult programme participants, or to their personal data.

2.4. Visits to CGE Projects

2.4.1. Visitors: Visitors subject to this Policy include people going to a CGE programme or meeting children at a CGE-facilitated event.

a. “Visitors” include sponsors, donors, other delegations such as celebrity supporters or journalists invited by CGE.

b. Government officials or institutional donors (government, multilateral) based in the hosting country do NOT require Safeguarding clearance, but are accompanied by a CGE employee(s).

c. Unannounced visits to sponsored children or CGE project communities are not permitted.

2.4.2. Visit Preparation: Visits by all sponsors and private donors, and other international visitors are pre-approved by both the sending and the hosting office. The office sending the visitor conducts a police background check on potential sponsor or donor visitors prior to any field visit, where permitted by law.

2.4.3. Visitor Orientation to Safeguarding: Each CGE Entity is diligent to ensure that visitors uphold the relevant sections of this Policy. The following requirements apply to visitors who visit a project or have direct contact with community members in CGE programming areas.

a. Visitors from other CGE offices who are employees or Board Members: The responsible project officer provides a brief orientation to any distinctive Safeguarding Behaviour Protocols that apply in that context, as well as local customs regarding adult interaction with children. Employees and Board members do not need to re-sign the policy or behaviour protocols

b. Visitors who are not CGE employees or Board Members: All such visitors are briefed on CGE's Safeguarding Behaviour Protocols (Section 2.2.1) and Prevention of Harm in Communications (Section 2.5.3) by the sending office prior to the visit. Upon arrival, visitors receive a brief written or oral orientation and sign acknowledgement of receipt of the protocols. The signed acknowledgement is kept on file by the hosting entity. Non-employee or Board visitors are accompanied by a CGE employee when visiting projects.

2.5. Communications, Content, and Marketing

2.5.1. Dignity: CGE takes care to ensure cultural sensitivity and restrictions for reproducing personal images are adhered to before photographing or filming a subject, and CGE ensures images are honest representations of the context and the facts. In all forms of communication, children and adults are treated and portrayed with dignity and not as helpless victims or in sexually suggestive poses.

2.5.2. Consent: Children and adults who are primary subjects of text, photo, video, audio and/or data gathered on behalf of CGE must provide informed consent, and have the right to withdraw their consent at any time for any reason. CGE must be able to demonstrate that informed consent has been given, and have systems in place that allow CGE to show that a request to withdraw consent has been respected.

Informed consent means the subject has a general understanding of the purpose of the content, and gives verbal or written permission thereof. If the primary subject is a child, informed consent is also collected from the parent, guardian, or other legally required entity or individual.

In the following situations, verbal consent is not acceptable and written consent is collected adult or the child's legal guardian:

a. the sensitive nature of their personal disclosure or situation could possibly cause damage to their privacy, dignity, safety or reputation, or

b. where otherwise required by applicable law

2.5.3. Prevention of Harm in Communications: CGE is committed to storytelling that raises awareness of and promotes solutions to ending violence and abuse against children and adults. CGE takes the following steps to prevent harm through communications, content gathering and

marketing (including digital or offline photographs/videos/audio clips, stories, articles, or any other communication materials):

- a. Personal information on children and adults that is captured, stored or sent through electronic, on-line or mobile devices is password protected. In addition, data is handled in accordance with CGE's current information security standards for personal data, which may include encryption and other requirements.
- b. CGE ensures that relevant requirements for safeguarding are clearly communicated to all staff, sponsors, vendors and partners at the point of access to photographs, videos or data, and that appropriate measure are taken for child-safe usage of the content once it has been shared.
- c. Recognising the special vulnerability of children, material posted on social media or digital channels mentions only the child's first name and country name, and does not contain a child's family name, sponsorship ID number, or child's personal location/address. In cases of sensitive subjects such as unaccompanied children or child sex workers among others, CGE conceals the child's identity in images and uses a pseudonym.
- d. Material with a child or children is not geo-tagged to precise locations if it contains any part of the child's name. An acceptable alternative is to retag photos with the child's first name only to the Area Programme or project office location.
- e. CGE discourages direct, unfacilitated, undocumented communication through social media without CGE's knowledge between: a sponsor/donor/visitor and registered/non- registered children and between employees/volunteers/other CGE affiliates and registered/non-registered children.
- f. Where CGE facilitates communication between children and external parties, controls are put in place to protect children's safety and well-being.
- g. CGE provides reporting and response options so that sponsors, donors, visitors, children or their caregivers can report any incident(s) where either party feels uncomfortable or threatened. Sponsorship welcome kits, CGE websites, domains and social media platform profile pages contain reporting options for child protection concerns or safeguarding incidents.
- h. Use of platforms to share marketing or communications content with no ability to track back evidence of informed consent and/or platforms that lack the ability to withdraw consent is forbidden. Only platforms that have been vetted by CGE are permitted for sharing content between offices or with donors/external parties. (e.g. Horizon, RMT, StoryHub, etc.)

2.6. Safeguarding Incidents and Response Protocols

2.6.1. Responding to Safeguarding Incidents: CGE and any future subsidiary entities are required to investigate and respond to reports of violations of this Policy and harm of children adult programme participants in ways which are consistent with local law. CGE uses three levels of Safeguarding Incidents to determine CGE's response, which is based on the seriousness of the incident and CGE's role. Offices with community-based programmes develop a Safeguarding Incident Preparedness Plan (SIPP) which defines response in line with local law and available services.

2.6.2. Level 1 Child Protection Community Incidents: Abuse of or harm to a child, in a community where CGE has programme operations and that is not committed by CGE employees or affiliates, is a

Level 1 Incident. Field offices track and document Level 1 Incidents and respond according to their SIPP in cases of serious harm that threaten the child victim's survival, safety or development.

2.6.3. Level 2 Safeguarding Incidents: Level 2 Incidents are defined as any violation of this Policy which puts any child anywhere or adults living where CGE is active in direct risk of potential harm, but where no actual harm is believed to have occurred. CGE Entities report Level 2 Incidents to CGE Erfurt e.V. Safeguarding within 24 hours of first notice. Response is implemented by the national entity with oversight by and accountability to the CGE E Erfurt e.V. Safeguarding Unit and support from the Regional Safeguarding focal point.

2.6.4. Level 3 Safeguarding Incidents: A Level 3 Incident is an allegation or accusation of harm or abuse to any child anywhere or adults living where CGE is active by a CGE employee or affiliate. If a child is involved, two additional types of incidents qualify: death or serious injury of a child while participating in or at a CGE activity or caused directly by a CGE-related person, and/or a road traffic accident involving a CGE vehicle or driver affiliated with CGE in which a child is injured or killed. CGE Entities report actual or alleged Level 3 Incidents to CGE Erfurt e.V. Safeguarding within 24 hours of first notice. Response is implemented by the national entity with oversight by and accountability to the CGE Erfurt e.V. Safeguarding Unit and support from the Regional Safeguarding focal point.

Where mandated by applicable law, grant requirements, or agreements with CGE Erfurt e.V., relevant Support Offices are informed immediately in coordination with CGE's legal counsel. See section 2.6.6 Notification of Safeguarding Incidents.

2.6.5. Reporting incidents: All CGE employees and affiliates are responsible and obligated to report any suspicion of Level 2 or Level 3 incidents as soon as it is discovered. As stated in section 2.2.3(d), failure to report by one of the mechanisms below is breach of this Policy and is grounds for disciplinary action up to and including termination of employment.

In addition, any credible concern or suspicion of sexual abuse or exploitation by a humanitarian worker outside CGE is immediately reported. Where interagency mechanisms are established, these are utilised to report the incident, in consultation with the CGE Safeguarding Lead.

Reports can be made by CGE employees or affiliates in the following ways:

- a. Report to CGE Chairperson
- b. Contact CGE Safeguarding Lead (who then reports to the CGE Chairperson and Board)
- c. Contact CGE Erfurt e.V. Safeguarding Unit by email at safeguarding@CGE-Erfurt.org

2.6.6. Notification of Safeguarding Incidents: The CGE Erfurt e.V. Safeguarding Lead informs the affected project teams and Multilateral donors of safeguarding incidents according to contractual obligations and regulatory requirements. Additionally, project teams and staff may be notified if an incident has potential reputational issues.

- a. The CGE Erfurt e.V. Safeguarding Lead can provide a copy to the project team for the purpose of notifying local donor offices if appropriate.
- b. In line with the principle of "need to know", no identifying information on survivors, witnesses or subjects of complaint are shared in these notifications.
- c. Only basic information is provided in order to a) ensure the privacy and safety of those involved in the incident and b) provide assurances that CGE is appropriately managing the case.

d. Support Offices notify their national donors according to contractual/regulatory requirements using the information provided by the CGE Erfurt e.V. Safeguarding Unit's notification.

2.6.7. Disclosure: Whilst CGE maintains appropriate confidentiality for individuals in Safeguarding Incidents, CGE may disclose information or data about incidents, when lawfully permitted, in order to support prosecution of suspected criminal activity, meet donor and regulatory requirements, support learning and accountability, enable appropriate due diligence, advocate to prevent future incidents, or as required by law.

a. Information in ongoing investigations of Safeguarding Incidents, and information about past incidents, is shared only with those on a 'need-to-know' basis, as deemed necessary by CGE's Safeguarding Lead. If it is likely that sensitive information about survivors or about violence against children or adults will not be kept confidential, and would put people at risk if accessed by unauthorised parties, such information is not collected.

b. Detailed personal information, in particular health information, is not obtained or maintained by CGE in safeguarding incident management, except for the minimum necessary to ensure CGE handles the matter appropriately. Such personal data is kept strictly confidential and protected in accordance with the applicable data protection and informational security standards.

2.6.8. Reporting to Authorities: CGE Erfurt e.V. and any future subsidiary entities evaluate reporting safeguarding violations to appropriate legal authorities, assessing any legal obligations to report, as well as the interests of the survivor(s). CGE reports when legally authorised to do so, unless a report is judged likely to cause greater harm to existing victims or potential future victims.

2.6.9. No Retaliation for Reporting: CGE does not tolerate any harassment, retaliation or adverse action whatsoever by any employee, director, contractor or other affiliate as a result of any safeguarding report provided in good faith to CGE, law enforcement or other recognised reporting mechanism.

a. No employee shall be adversely affected because they refuse to carry out a directive that could reasonably be construed as likely to create abuse or neglect of a child or an adult programme participant.

b. If an employee believes that they are being retaliated against, the employee should immediately contact the CGE Chairperson or Board. Anyone who retaliates against an employee for making a good faith report will be subject to disciplinary action up to and including termination. CGE's commitment to anti-retaliation does not prevent a reporter from appropriate disciplinary action if they are found to have engaged in unethical behaviour or misconduct.

2.6.10. Safeguarding Investigations: Safeguarding investigations meet minimum standards and follow the core principles of investigating allegations of harm, exploitation or abuse to child &/or adult living where CGE is active: thoroughness, confidentiality, safety, competent investigators, impartiality, objectivity, timeliness, accuracy and documentation.

a. Investigations follow a survivor-centred approach and investigators conduct the process in accordance to sector best practice to prevent further harm to the survivor. CGE prioritises the safety, physical and psychological health and welfare of all survivors while upholding and promoting their rights of confidentiality, equality and access to justice.

b. CGE may deploy internally trained investigators or retain the services of an external investigator to manage an incident. Oversight of investigations takes place according to the protocols of the incident level.

2.7. Programming Considerations for Safeguarding

2.7.1. Safeguarding Essentials in Programming: In all programmes (including development, humanitarian response and advocacy), CGE seeks to do no harm to children or adult programme participants, to keep the interests of community members—especially children— at the centre of our activities, and to utilise opportunities to help children be safer within their families and communities. This includes consideration of local child protection threats and issues during the entire program life cycle, and influencing local actors and groups to be safer organisations for children and adult programme participants.

2.7.2. Community Feedback and Complaints Mechanisms and Information Provision: Children, parents, and other adults are aware of established complaint mechanisms in CGE projects and their right to be safe from abuse and exploitation in CGE programmes. As part of our wider Programme Accountability Framework, every community-level CGE programme:

a. ensures that there are community feedback and complaints mechanisms through which community members can report both general suggestions and any serious incidents of misconduct by CGE employees or affiliates. These mechanisms should be safe and contextually appropriate (i.e. designed in consultation with the community and so child-friendly, gender-sensitive and inclusive of those with low levels of literacy).

b. provides information to communities on what behaviour they can expect of CGE employees or affiliates and how to report any concerns about abuse, exploitation, or any other breaches of Behaviour Protocols by CGE employees or affiliates.

2.7.3. Online safety in programme activities: CGE actively supports Registered Children (RCs) and their parents/caregivers—as well as any children participating in CGE-organised digital activities—to understand how to safely and appropriately utilise social media and digital technology, while avoiding risks and appropriately responding to threats or incidents.

2.7.4. Humanitarian Responses: Because of the special vulnerability of children and adults during humanitarian responses, safeguarding measures take on additional importance. Category 3 Responses must meet the standards outlined in this Policy in addition to other industry standards.

a. Humanitarian protection and child protection are anticipated and planned for in programme designs, ensuring that CGE does not expose programme participants to greater harm through participation.

b. All Category 3 Responses must complete a safeguarding self-assessment.

c. All Category 3 Responses must have an assigned Safeguarding Lead who has direct access to response management and who has responsibilities as expressed in section 2.1.7 of this Policy.

d. Some aspects of this Policy may be addressed through accepted industry mechanisms, such as the cluster system or PSEA network.

2.8. Safe Child Participation

2.8.1. Prevention of Harm in Child Participation: CGE works to empower children as citizens and participants in their own well-being, and to minimise any risk of harm or negative consequence resulting from participation in activities promoted by CGE.

a. Child participation programmes and activities are based on context analysis with clearly identified needs and expected results, along with how the project will measure progress towards achievement while mitigating risks through risk assessments.

2.8.2. Ethics: Child participation activities are designed and implemented to adhere to principles and ethics which keep the best interests of children as the top priority.

2.8.3. Informed Consent in Child Participation: Child participation activities are voluntary and inclusive (especially of the most vulnerable children), and both children and parents/caregivers make informed decisions regarding participation, including due consideration of the benefits and risks that could be associated with the activity. Consent forms must be kept on file.

2.8.4. Child Travel: When it is in the best interests of children, CGE sometimes helps children travel to domestic or international events, activities or other opportunities.

a. In such cases the child and the parents or caregivers, or other legally required entity or individual, give informed consent prior to the travel.

b. The child's health, safety, well-being, and meaningful participation are the most important priorities during travel supported by CGE.

c. CGE does not facilitate visits of children outside of their country to their sponsor.

2.9. Board and Advisory Council Safeguarding Governance

2.9.1. Accountability: the CGE Board and future Advisory Councils hold the CGE office accountable to fulfilling their safeguarding responsibilities as outlined in the Board-level Partnership Policy for Child and Adult Safeguarding as well as the Partnership Management Policy for Child and Adult Safeguarding.

2.9.2. Committee oversight: The Board/AC mandates one of its committees to provide oversight (or in the case of an Advisory Council committee, advice) to safeguarding. Given the heightened level of importance of safeguarding oversight, the full Board/AC receives periodic reports and is informed as well as engaged on safeguarding issues.

2.9.3. the Office reports provided to the full Board/AC: The Office provides a copy of the Annual Safeguarding Update Report to the Board/AC. The Office also provides the associated Safeguarding Action Plan outlining how they will maintain and improve safeguarding controls as outlined in the Annual Safeguarding Update Report.

2.9.4. Training of Board/Advisory Council members: At inception, the entire Board/Advisory Council are given training by the CGE Erfurt e.V. Safeguarding Lead.

a. Every new member to the Board/Advisory Council are given this training at orientation, and sign an acknowledgement of having reviewed the Partnership Management Policy on Child and Adult Safeguarding. This acknowledgement is kept on file by the Office.

b. Board/Advisory Council members re-elected to serve another term repeat the training they received at orientation to refresh their knowledge.

3. DEFINITIONS

Child: Any person below the age of 18. This Partnership Management Policy on Child and Adult Safeguarding covers interactions by CGE employees and affiliates with all children anywhere (not only programme participants).

Child protection: All measures taken to prevent and respond to abuse, neglect, exploitation and all other forms of violence against children. “Community with whom CGE works” or “living in a CGE Programming Area”: CGE uses a broad working definition of these terms to ensure that any individuals who may be subject to power imbalance with CGE staff, affiliates, or programming are protected through this Policy.

Contractor: CGE regularly contracts with non-employee individuals and organisations to perform services for CGE. These non-employee individuals and organisations may also be referred to as ‘independent contractors’, ‘consultants,’ or ‘vendors’, and are referred to in this document as ‘Contractors’. Contractors are distinguished from organisations with which CGE partners to carry out programme activity (including subgrantees). See Partner, below.

Partner: A partner organisation, for safeguarding purposes, is a Non-Governmental Organisation, Community-Based Organisation, for-profit enterprise, or other entity that has a written agreement with CGE to implement a programme or activity on CGE’s behalf or in collaboration with CGE. The partner may or may not receive funding from CGE.

Safeguarding: Preventing, reporting, and responding to harm or abuse by CGE employees and affiliates, of any children anywhere and of any adults living where CGE is active. Externally to CGE, there is often no distinction made between child and adult safeguarding.

Child safeguarding: Preventing, reporting, and responding to harm⁴, abuse or exploitation of any child (< age 18) by a CGE employee or affiliate⁵. The Partnership Management Policy on Child and Adult Safeguarding also requires reporting/referring child abuse cases affecting any child in CGE programmes, even if not committed by CGE employees or affiliates.

Adult safeguarding: Preventing, reporting, and responding to harm, abuse or exploitation of an adult living where CGE is active (age 18+) by a CGE employee or affiliate⁶. Includes Prevention of Sexual Exploitation and Abuse (PSEA), a frequently cited subset of safeguarding.

Safeguarding incident: Harm or risk of harm resulting from safeguarding misconduct or violations of this Policy to any child or to any adult living where CGE is active, Sexual Exploitation and Abuse (SEA): The term “sexual exploitation” means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. The term “sexual abuse”

⁴ Includes injury or death of a child while participating in a CGE activity or when involved in a road traffic accident with a CGE driver or CGE vehicle.

⁵ Includes CGE employees, volunteers, interns, Board members, visitors, contractors, or partners—as well as employees or sub-contractors of partners and contractors.

⁶ Ibid.

means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.⁷

Prevention of Sexual Exploitation and Abuse (PSEA): A term used by the United Nations and International Non-Governmental Organisation community to refer to measures taken to protect vulnerable people from sexual exploitation and abuse by humanitarian aid workers.

Volunteer: A person who is neither employed by CGE nor legally obliged to work for CGE, but who on free will and without expectation of payment or other remuneration, contributes their time, skill, knowledge, efforts and expertise to CGE's work. 'Volunteer' includes a 'business volunteer' in a CGE office or affiliate; a 'supporter volunteer' without physical contact with sponsored children or their records; 'community volunteer' who volunteers on behalf of their community to fulfil the community's responsibilities in an ongoing CGE project; and volunteers or 'incentive workers' from groups or communities targeted for humanitarian assistance. All categories of volunteers are subject to the contextualised Policy on Safeguarding, except community volunteers for whom the following apply:

1. The community volunteer does not have physical contact with sponsored children or their records as part of their volunteer activities; AND
2. Beyond basic training, CGE does not specify how to complete the relevant activities; AND
3. The community does not perceive or consider this person as 'part of CGE's work' due to their volunteer activities, and if they were to harm a child or adult, would not be expected to hold CGE responsible.

CGE employees and affiliates: Refers to the full range of people accountable to CGE's Safeguarding policies and protocols, including all employees, interns, volunteers, and Board/Advisory Council members, as well as external parties, including visitors, community volunteers, contractors, partners, and others affiliated with partners or contractors.

4. BACKGROUND

This Partnership Management Policy is authorised by the Partnership Policy on Children's Well Being and Partnership Policy on Code of Conduct. This Policy is grounded in CGE's broader ministry mandates — particularly Child Protection, which builds community capacity and strengthens local and national systems that protect children.

This Policy continues to emphasise the unique vulnerabilities and special protection requirements for children, along with the importance of preventing sexual exploitation and abuse (SEA), in particular, among other forms of abuse of adults living where CGE is active.

On behalf of CGE e.V.,

Erfurt 20.02.2023



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Chairperson

⁷ UN Secretary-General's Bulletin on protection from sexual exploitation and abuse (PSEA) (ST/SGB/2003/13)