

NPH SAFEGUARDING POLICY

NPH provides protection to vulnerable children, persons with disabilities and vulnerable adults¹, while strengthening families and communities in Bolivia, Dominican Republic, El Salvador, Guatemala, Haiti, Honduras, Nicaragua, Mexico, and Peru. **NPH is committed to assuring the best possible care for Beneficiaries by implementing programs and training staff responsible for the care in the residential, family and community settings where we serve.**

Together, we create a family environment that promotes the well-being of children, persons with disabilities and vulnerable adults based on **the United Nations Convention on the Rights of the Child², the Convention on the Rights of Persons with Disabilities³ and the corresponding responsibilities defined by Father Wasson's philosophy.**

Our goal is the physical, intellectual, moral, and spiritual development of each child, youth, person with disability and vulnerable adult by providing personalized attention.

The purpose of this safeguarding policy and associated procedures is to provide clarity to all how they should interact with children, persons with disabilities and vulnerable adults when working for, on behalf of, or in partnership with NPH. It is also to help us make sure that employees, volunteers, and other representatives are protected.

Through their work, NPH employees, volunteers, consultants, visitors, and employees and volunteers of partner organisations **may interact with children, persons with disabilities, and vulnerable adults either directly or indirectly.**

It is NPH obligation to put in place all reasonable safeguarding measures to ensure, as much as possible, the safety and protection of children, persons with disabilities, and vulnerable adults with whom we work.

NPH ensures that NPH employees, volunteers, consultants, interns, visitors and partners in operations and programmes **do not harm or expose children, persons with disabilities, or vulnerable adults to the risk of discrimination, neglect, harm, and abuse.**

NPH protects its employees and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse.

Any concern about the safety and wellbeing of children, people with disabilities, and vulnerable adults, who are Beneficiaries of the NPH programmes needs to be addressed and reported to the appropriate authorities.

¹ please see the glossary for the definition of child, adolescent and vulnerable person

² <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

³ <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

⁴ <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-persons-disabilities#:~:text=States%20Parties%20shall%20take%20effective,in%20all%20aspects%20of%20life.>



NPH will not tolerate any sexual abuse, or any act of exploitation being committed by any of NPH's employees, volunteers, interns, consultants and visitors or anyone partnering with NPH in the delivery of our programmes and projects.

NPH will ensure that allegations of sexual exploitation and abuse are investigated thoroughly, are reported to the authorities and that appropriate disciplinary measures are taken.

1. Policy Statement

NPH has zero tolerance against mistreatment, abuse and exploitation of children, persons with disabilities and vulnerable adults. NPH also recognizes that safeguarding is everyone's responsibility and that it has an obligation to put in place reasonable measures to ensure, as much as possible, the safety and wellbeing of our Beneficiaries, their families and communities.

NPH works according to the following key principles to protect children, persons with disabilities and vulnerable people:

I. Everyone has an equal right to protection from abuse and exploitation regardless of age; ethnicity; sex; sexual orientation; marriage and civil partnership; gender; language; religion; political or other opinion; national, ethnic or social origin; access to property; disability; birth conditions or other status.

II. The best interests of children⁴ and vulnerable persons are paramount and shall be the primary consideration in NPH decision making.

III. NPH will take responsibility to meet our obligations regarding our duty of care towards children, persons with disabilities and vulnerable adults, and act when we believe they are at risk or are actually being harmed.

IV. NPH will ensure that employees and volunteers are inducted in our Safeguarding Standards and procedures as a key part of the recruitment and on boarding processes.

V. NPH will ensure that all people are informed and in compliance with our Safeguarding Standards.

VI. When working with or through partners, NPH will ensure that their safeguarding procedures are consistent and in line with the principles and approaches of the NPH safeguarding policy.

2. Structure and Standards

All programs and projects concerning the care of children have a **clear organizational structure**, with named individuals in charge and well-established processes.

Pedagogical, psychological, and medical standards are all set out in our manuals. They are evaluated locally and internationally. Regular training ensures that everyone concerned is kept up to date with current standards.

3. Basic rights training for children, persons with disabilities and vulnerable adults

NPH informs every year children, and vulnerable adults in our programmes about their rights, how to make a complaint and about the help available to them.

We hold **training sessions by age group** to teach them how abuse can be prevented, **how they can react to intrusive behaviour** and get support.

4. Care standards

Medical examinations of underage patients are carried out in the presence of a second person.

Therapy and counselling session by psychologist or social workers **only take place in designated rooms** and spaces that are **appropriate to safeguard** the Beneficiaries. Children in alternative residential care settings spend the night in small dormitories with an individual bed for everyone. The dormitories and living spaces are separated from staff rooms. Children and adolescents **are not allowed to enter staff rooms for any reason at any time**. There is a night shift of childcare workers that also monitors the children's dormitories to **prevent any violation of the privacy and integrity of each child**. Staff, volunteers, and childcare staff **are not allowed** to leave the facility to go on outings alone with a single child, or vulnerable person. Excursions of children **with sponsors or visitors are only permitted if accompanied and without overnight stays outside the children's home**.

The staff in the care, education and medical sectors is screened before employment (background check) and has to pass several personality tests, as well as a special test for childcare workers.

Regular training sessions are held for staff (at least twice a year) on safeguarding, abuse prevention, policies and protocols.

Children are also regularly interviewed (once a year) by our psychologists and social workers about their well-being. Every suspected case is investigated and reported to the local youth welfare authorities.

Every suspected case is investigated and reported to the local child welfare authorities.

5. Recruitment and Selection

Safe recruitment and vetting processes are followed for all volunteers, employees, consultants, and partners.

Where an employee, volunteer or partner is engaged in direct work with children and vulnerable adults, **a criminal background check will be undertaken as part of the recruitment process**.

Where employees or volunteers are contracted by other employers, or when working with partners or subcontracted agencies, **NPH will brief them on our safeguarding policy and ask for information on**



how the organisation works to protect vulnerable people and ensure that they meet our Safeguarding Standards.

6. Ethical Fundraising

The associations and collaborative alliances of NPH will adhere to the guiding principles indicated in the Convention on the Rights of the Child, the international regulations that protect persons with disabilities and vulnerable people, and the values and principles of NPH.

Fundraisers will not accept donations from associations and companies whose commercial objectives are not in accordance with the values of NPH and/or the rights of girls, boys and persons with disabilities and vulnerable adults.

7. Photos and Children rights

All NPH staff, fundraising office staff, volunteers, and visitors are asked to review the current regulations regarding sharing photos of children on any social media platform. The real name of any child in NPH custody must not be used.

NPH follows a strict media policy to guarantee the rights of children. In the case of children and adolescents living in homes, **actual names are replaced with aliases in official publications. Biographical details and the medical history of children and youths are kept confidential.**

Photos must respect the dignity of girls and boys and not show their vulnerability or be sexualized.

For the purposes of publishing photos in the community, you must have the permission of children and with the written and signed permission of their parents or guardians. **In the case of babies and people with disabilities who cannot express their opinion, they must have the written permission signed by their parents and guardians.**

We also maintain these standards in the media and Public Relations work of NPH. **Child sponsors, donors and decision-makers are all made aware of the rights of children.**

8. Reporting of Allegations

NPH has an open-door policy and suggests children, persons with disabilities, vulnerable adults, and their families' as well as employees, volunteers, or visitors to share their questions, concerns, suggestions, or complaints with someone who can address them properly. We encourage and enable all to raise concerns within the organization prior to seeking resolution outside the organization.

If a child or adult has any concern, they are encouraged to discuss it directly with the person involved or to seek support from a trusted adult or direct supervisor. In case this is not possible, the people of the local grievance committee are there to listen concerns.



In most cases, a child's or youth's caregiver, teacher, psychologist or social worker are in the best position to address concerns and complaints from children, persons with disabilities, vulnerable adults and their families.

For employees or volunteers their supervisors are **in the best position to respond to concerns, complaints or reports of misconduct.**

No child, person with disabilities, vulnerable adult, employee, volunteer, or visitor who in good faith reports a misconduct or a violation of NPH policies shall suffer harassment, retaliation, or adverse employment consequence. Any NPH staff member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

NPH employees and volunteers are obliged to create and maintain an environment which **prevents sexual exploitation and abuse and promotes the implementation of the code of conduct.**

Where an NPH employee or volunteer develops concerns or suspicions regarding sexual abuse or exploitation by a co-worker, **he or she must report such concerns via established reporting mechanisms.**

NPH respects confidentiality and has a responsibility to protect sensitive personal data. Information should only be shared and handled on a need-to-know basis, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.

9. Cultural Sensitivity

NPH seeks always to work in ways which are culturally sensitive and that respect the diverse nature of the people we work with. It is acknowledged that protecting our Beneficiaries and being culturally sensitive can be a difficult balancing act, especially given the situation in many of the countries where we work.

As an international organization, we endorse the United Nations Convention on the Rights of the Child general principle, that all the rights guaranteed by it must be available to all children without discrimination; and article 19⁴ which accords equal rights to protection for children from abuse. Every child matters everywhere in the world. Culture must not be used as an excuse to abuse children, or vulnerable adults.

NPH commits to monitoring the implementation of the safeguarding policy and prepare a report every six months.

This policy will be updated annually by the NPHI Family Welfare department, and all changes must be approved during the general assembly.

⁴ <https://www.ohchr.org/es/instruments-mechanisms/instruments/convention-rights-child>

10. Procedures to Handle Allegations

NPH places a mandatory obligation on all employees, volunteers, contractors and partners to report concerns, suspicions, allegations and incidents which indicate actual or potential harm, abuse or exploitation of vulnerable people, or which suggests this policy may have in any other way been breached.

It is not the responsibility of the person reporting to decide whether mistreatment or abuse has taken place, and the person must abstain completely from investigating suspected cases.

Concerns should be raised with an individual's supervisor or directly with the National Director

NPH will ensure that any allegation of sexual exploitation and/or abuse involving any of NPH's employees, volunteers, employees of our partner fundraising organizations, consultants, representatives, and visitors will be thoroughly investigated.

Appropriate measures will be taken in accordance with relevant local laws. Services will be offered to repair the damage for the victims and aggressors and prevent it from happening again.

NPH is not an investigative authority. It is essential that referrals are made to the relevant law enforcement agency to ensure that appropriate protection and support is given to the child or vulnerable person, and that any evidence is collected in accordance with the law.

Programme Directors are responsible for handling reports, allegations, or concerns, about the protection of children and vulnerable persons, appropriately and in accordance with the procedures outlined in the NPH policies.

They are responsible for:

- I. **Monitoring and recording** safeguarding concerns.
- II. **Ensuring** referrals to the relevant authorities happen without delay.
- III. **Updating** safeguarding training for all staff.
- IV. **Ensuring** the Safeguarding Policy is implemented throughout the organization and adequate training is given.
- V. **Ensuring monitoring and recording** procedures are implemented.

All sensitive and personal data must be kept confidential (including the names of anyone who makes a report of abuse) and be shared on a strictly 'need-to-know bases', that is, access must be necessary for the conduct of one's official duties. **Personal information is kept confidential** unless we have the agreement of the individual and/or their parent/guardian, except where it is necessary to pass this to a specialised child welfare or law enforcement agency in relation to a safeguarding incident.

Where an NPH employee is the subject of an internal investigation, the National Director in the country, -respectively the CEO for NPHHI employees- will lead the case.

Any breach of this policy will be treated as a disciplinary matter, which may result in immediate termination of employment or contract, withdrawal of volunteer status, and reporting to the police, or relevant regulatory authority.

11. Responsibilities

All employees, volunteers, consultants, interns, employees of partner organisations and visitors are obliged to follow this policy and maintain an environment that prevents exploitation and abuse, and which encourages reporting of breaches of this policy using the appropriate procedures.

All people working with NPH will:

- I. **Read, understand, and adhere** to the NPH Safeguarding Policy and NPH Code of Conduct.
- II. **Strive to promote a zero-tolerance** approach to discrimination, sexual harassment, and abuse in all work environments.
- III. **Strive to develop relationships** which are based on equality, trust, respect, and honesty.
- IV. **Place** the safety and welfare of children, persons with disabilities and vulnerable people above all other considerations.
- V. **Report any concerns** they may have about the welfare of children, persons with disabilities and vulnerable persons.
- VI. **Report any concerns** they may have about the behaviour of an NPH representative or employee in relation to safeguarding.

In a one-to-one situation with a child or young person, **where privacy and confidentiality are important**, employees and volunteers try to make sure that another adult knows the contact is taking place and why. If possible, ensure another adult is in sight and that the child or young person knows another adult is around.

All people working with NPH will:

- I. **Never** sexually harass, assault, or abuse another person.
- II. **Never** emotionally abuse another person, this includes behaviours intended to shame, humiliate, belittle, or degrade.
- III. **Never** condone, or participate in behaviours, which are abusive, discriminatory, illegal, or unsafe.
- IV. **Never** develop or encourage relationships with children or other vulnerable persons which could in any way be deemed sexual, exploitative, or abusive.
- V. **Never** act in ways that may be violent, inappropriate, or sexually provocative.

VI. **Agree** with a child to keep a secret which has implications for their safety or the safety of other young people.

ANNEX 1 - CODE OF CONDUCT

NPH provides protection to vulnerable children, persons with disabilities and vulnerable adults, while strengthening families and communities in Bolivia, Dominican Republic, El Salvador, Guatemala, Haiti, Honduras, Nicaragua, Mexico, and Peru. NPH is committed to assuring the best possible care by implementing programs and training staff responsible for the care of the Beneficiaries of all our Programmes.

All together we create a family environment that promotes the well-being of children, persons with disabilities and vulnerable adults based on Father William Wasson's philosophy. Our goal is the physical, intellectual, moral, and spiritual development of each individual child, person with disabilities and vulnerable adults by providing personalized attention.

Our childcare and care standards are a reflection of the rights of children, and persons with disabilities as stated in the United Nations Convention on the Rights of the Child, the Convention on the Rights of Persons with Disabilities and the corresponding values and principles as defined by Father Wasson's philosophy.

The aim of the code of conduct is to take responsibility for the safety, well-being and protection of children, persons with disabilities and vulnerable adults in the environments where NPH operates, and the prevention of all kinds of discrimination, violence and abuse.

All NPH employees, volunteers, as well as any visitor in the settings where NPH operates must sign the Code of Conduct. By signing it, the individual commits to creating and maintaining a safe environment for children, youths, persons with disabilities, vulnerable adults, and all people in the care of NPH.

In this respect, I will:

- A. Respect the human dignity of children, persons with disabilities, vulnerable adults, and their need to always experience protection.
- B. Protect children, persons with disabilities, and vulnerable adults from neglect and from physical, psychological, and sexual abuse and exploitation.
- C. Treat with respect all children, persons with disabilities, and vulnerable adults in all the environments where NPH operates.



- D. Treat adults responsible for the care of children, persons with disabilities, and vulnerable adults in their communities with dignity and respect.
- E. Verbally and nonverbally refrain from violent, discriminatory, racist and sexist behaviour towards and in the presence of children, persons with disabilities and vulnerable adults.
- F. Respect the opinions and concerns of children, persons with disabilities and vulnerable adults and allow them to participate in all matters affecting them according to their age and maturity.
- G. Contribute to an environment where each child, person with disabilities and vulnerable adult is able to freely express their opinion without fear of victimization or retaliation.
- H. Contribute to creating a safe, nurturing environment which is free from bullying, harassment and discrimination.
- I. Take the children' beliefs and concerns seriously to foster their personal growth.
- J. Use positive discipline that is free of violence and humiliation.
- K. Model healthy and respectful relationships.
- L. Do not share any details about the personal life or family of a child. In the case of persons with disabilities and vulnerable adults, request their written permission.
- M. Respect the personal history of each child, youth, person with disabilities, and vulnerable adult.
- N. Respect all NPH media policies, and do not share any photos or videos on any social media platform without permission.
- O. Report violations of child protection policies (i.e. NPH childcare policy, media policy, visitor policy).
- P. Adhere to all laws that govern the countries in which NPH serves.

I will also refrain from any and all forms of threats, discrimination, physical or verbal abuse. This means that:

- A. I will never hug, kiss, or touch a child in any manner that is inappropriate or culturally insensitive.
- B. I will never abuse the power afforded by my position or office on the life and well-being of a child, person with disabilities or vulnerable adult.

- C. I will never hit or physically assault people where NPH operates in any way.
- D. I will never leave a child, or person with disabilities in unsupervised isolation.
- E. I will never abuse or exploit sexually, physically, or emotionally a child, person with disabilities or vulnerable adult.
- F. I will never engage in sexual activities with children or adolescents.
- G. I will never use language that is inappropriate or suggestive.
- H. I will never make sexual innuendos or suggestive actions towards children or adolescents.
- I. I will never tolerate or facilitate illegal, dangerous or abusive conduct toward children, persons with disabilities or vulnerable adults.

ANNEX 2. GLOSSARY

Child – NPH regards a child as anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

Adolescent – NPH regards a child from 10 years up till the child reaches the age of majority, 18 years, as adolescent.

Vulnerable person/s – for the purposes of this policy this is an umbrella term which covers children, young persons and vulnerable adults. Vulnerable adult - a person, 18 years and above, who by reason of disability, age, gender, social and economic status, illness, or the context they are in, may be unable to take care of or to protect him/herself against abuse, harm, or exploitation.

Assault - any actual or attempted aggressive act that deliberately violates or threatens the physical integrity of an individual or group. It is often believed that assault is limited to direct physical violations only, but as a concept it also includes indirect infringement on personal space. Different types of Assaults: Sexual assault, Physical assault, Verbal assault.

Harassment - a group of unwanted abusive practices that are threatening to the recipient by their very nature. Unlike bullying, harassment need not be targeted. It may take place directly or indirectly, so that it creates an atmosphere of distress, heaviness, and insecurity. Different types of Harassment: Physical harassment, Verbal harassment, Sexual harassment

Bullying - any abusive practice or behaviour directed by an individual or group of individuals towards another individual or group. Bullying can be considered a form of harassment that is more frequent and systematic. It aims not only to violate the receiving party, but also to belittle them. Bullying is characterised by being targeted at a person or group of people, while harassment needs not be targeted. Different types of bullying: Physical bullying, Verbal bullying, Indirect bullying, Intellectual bullying, Cyberbullying, Gender-based bullying and/or any discrimination based on sexual orientation.

Abuse - a violation of an individual's human and civil rights by any other person/s. It can take the form of physical, psychological, financial, or sexual abuse, neglect, or negligent treatment, or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person, or vulnerable adult. Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

Discriminatory abuse – abuse motivated by a person's age, ethnicity, nationality, sex, sexual orientation, gender, disability, or another personal characteristic.

Neglect - the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in serious impairments of his/her health and/or development. Examples include failure to provide adequate food, clothing and shelter, protection from physical or psychological harm or danger; failure to ensure adequate supervision (including providing inadequate caregivers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a person's basic emotional needs.

Physical abuse – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

Psychological abuse - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving persons opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a person, which may include interactions that are beyond a person's developmental capability. It may involve serious bullying, or the exploitation or corruption of a person.

Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, including inappropriate touching, by force or under unequal or coercive conditions. Sexual abuse - involves forcing, enticing someone to take part in sexual activities, whether or not the person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

Sexual Exploitation is defined as the abuse of a position of vulnerability, differential power, or trust for sexual purposes; this includes profiting monetarily, socially or politically from the sexual exploitation



of another. Sexual exploitation and abuse constitute acts of gross misconduct and are therefore grounds for termination of employment.

Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.

Sexual relationships between NPH employees, volunteers and adult beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of our work.

Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to the beneficiaries.