

DTDA's Child Safeguarding Policy

1. Policy statement

DTDA does not tolerate any form of abuse, exploitation or harm of children, regardless of the situation or context. Any person employed by or representing DTDA who is found to have acted unlawfully or inappropriately towards a child will face disciplinary action.

DTDA commits to:

- Enforcing zero-tolerance towards any form of abuse, exploitation or harm of a child committed by any DTDA employee or representative or any DTDA partner.
- Promoting prevention of child labour through DTDA's programme and advocacy work at various levels.
- Maintaining a reporting system which DTDA employees, consultants, partners and other stakeholders, including children, consider safe to use.
- Ensuring prompt and effective follow-up on all reports about abuse, exploitation or harm of a child, regardless of the context and the persons involved.
- Applying a survivor-centred and age-appropriate approach to dealing with reported cases of abuse, exploitation or harm of children.
- Cascading to partners the requirement for having a child safeguarding policy (or equivalent) in place as well as a reporting system.
- Making all employees, consultants, partners and others aware of the present policy and the options for reporting instances of abuse, exploitation or harm of a child.

DTDA has consistently applied a human rights based approach to its development work for decades, and the basis hereof is the UN Universal Declaration of Human Rights §23, §24 and §25, which cover the key aspects relating to the conditions on the labour market. These fundamental human rights are further reinforced by the UN Convention on the Rights of the Child and the eight fundamental ILO Conventions, which include prohibition of child labour (C138 and C182).

Working to prevent child labour has thus been an integral part of DTDA's programming for a very long time, and DTDA shall not only continue to abstain from making use of child labour as an organisation itself but will also remain strongly committed to actively promoting the prevention of child labour through our programme work at both national, regional and international levels.

More broadly, DTDA shall enforce a zero-tolerance policy towards any form of abuse, exploitation or harm of children, whether committed by DTDA employees or representatives, by DTDA's partners or any other third party with whom DTDA collaborates.

This policy is applicable to anyone working for or with DTDA, and DTDA shall ensure that all persons, organisations and companies with whom collaboration is established are made aware of this policy and accepts their responsibilities hereunder. DTDA shall further ensure that

adequate preventive and remedial measures are in place to enforce the policy, and that ongoing monitoring of the application of the policy is carried out.

2. Definitions

DTDA is applying the following definitions:

Child labour is defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and/or
- interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely, or requiring them to attempt to combine school attendance with excessively long and heavy work.

The ILO Convention C138 stipulates that 15 years is the minimum age for work in general and 18 years is the minimum age for hazardous work. Accordingly, DTDA will never employ any person under the age of 15 and will not collaborate with any partner or supplier who does not respect the minimum working ages stipulated in ILO C138 and other relevant legislation.

Child safeguarding is defined as the systemic protection against any form of abuse, exploitation or harm of a person below the age of 18, or any other violation of the rights of the child, as set out in the UN Convention on the Rights of the Child and ILO Conventions C138 and C182. In the following, the terms abuse, exploitation and harm refer to all acts, utterances and behaviours towards children that constitute physical or emotional ill-treatment and are detrimental to their survival, safety, health, wellbeing, dignity or development. These include, but are not limited to:

- Inflicting physical or emotional pain, injury, distress or discomfort to a child.
- Yelling harshly at a child or using derogatory, demeaning or humiliating language.
- Making sexual advances towards, inappropriately touching or having sex with a child.
- Exploiting a child below the age of 15 for labour or exposing any child to hazardous work.
- Neglecting, isolating or depriving a child of nurture, access to education, medical care etc.
- Manipulating with, lying to, deceiving, endangering or misusing the trust of a child.

3. Preventive measures

DTDA shall implement measures to prevent that any form of abuse, exploitation or harm of a child is being committed by any DTDA employee or representative in connection with the work they carry out for DTDA. Similarly, DTDA shall ensure that all partner organisations have (or develop) a relevant child safeguarding policy (or equivalent), including a system for reporting of cases.

3.1 DTDA employees and representatives

In order to prevent abuse, exploitation or harm of children by DTDA employees and representatives, all staff members and consultants will be made aware of, and must read and

commit to, the present policy, as it constitutes an integral and compulsory part of all individual DTDA contracts.

Furthermore, all employees and representatives must sign onto DTDA's Code of Conduct, which includes a specific provision on prevention of abuse, exploitation or harm of children and makes explicit reference to the present policy.

Through relevant training, staff conferences etc., DTDA shall ensure that staff awareness about DTDA's zero-tolerance policy towards abuse, exploitation and harm of children and the options for reporting cases of this nature is being maintained at all times.

As described in DTDA's Prevention of Sexual, Exploitation, Abuse and Harassment (PSEAH) Policy, DTDA shall appoint a PSEAH focal point who will receive relevant training in the prevention and management of sexual exploitation, abuse and harassment cases. The PSEAH focal point will also be involved in the prevention and management of such cases if and when they pertain to children.

3.2. DTDA partners

All DTDA's partners will be made aware of, and must commit to, the present policy, as it constitutes an integral and compulsory part of all partner agreements. Moreover, all partner agreements (as well as all contracts with other third parties) involving funding from the Danish Ministry of Foreign Affairs must include the following provision (verbatim):

"The Implementing Partner shall abide by applicable national laws as well as applicable international instruments, including the UN Convention on the Rights of the Child and ILO Convention No. 138 on Minimum Age and Convention No. 182 on the Worst Forms of Child Labour. Any violation will be ground for immediate termination of the cooperation between the MFA and the organisation."

In connection with DTDA's partner selection processes, a formal partnership assessment must always be conducted as part of the due diligence and in accordance with the instructions in the applicable DTDA guidelines. Depending on the outcome of each partnership assessment, DTDA shall, as necessary, see to it that relevant capacity building is carried out with an eye to ensuring that relevant procedures on child safeguarding are implemented by each partner, as well as a system for reporting cases.

In connection with partnership workshops and financial monitoring visits, DTDA shall routinely ensure that all partners are aware of the present policy, including the options for reporting, and that they make sure to cascade the requirements herein to their potential sub-grantees and other third parties, as relevant.

Finally, DTDA shall ensure that all partners provide effective communication about the options for reporting cases of abuse, exploitation and harm of children to the various groups of rights-holders, in particular children, who take part in the programme activities implemented with

DTDA funds. It shall also be ensured that the options for reporting directly to DTDA are effectively communicated.

4. Remedial measures

DTDA shall ensure that a safe and responsive reporting system is in place and treat all reported incidents of abuse, exploitation or harm of children seriously and with confidentiality. In each case, DTDA shall apply a survivor-centred approach and immediately initiate a risk assessment and an investigation to determine the need for further action.

4.1 Reporting of observed or suspected cases of abuse, exploitation or harm of children

All employees, consultants, partners or companies who have signed a contract or agreement with DTDA are obliged to report immediately to their supervisor (in the case of DTDA employees) or to their contact person in DTDA (in the case of non-employees) if they observe or learn about an instance of abuse, exploitation or harm of a child committed by a DTDA employee or representative or by a DTDA partner. The same applies if they have substantiated suspicion that such acts are taking place.

If reporting to the relevant DTDA supervisor or contact person is not possible because the reporting involves that same person, the matter should be raised with the DTDA Director. If reporting to the DTDA Director is not possible because the reporting involves that same Director, the matter should be reported to DTDA's Chairman of the Board whose contact details can be found on [DTDA's website](#).

Alternatively, reporting can be made by use of DTDA's whistleblowing/complaint mechanism which can be found [here](#) on DTDA's website, or by writing directly to: complaint@dttda.dk. The whistleblowing/complaint mechanism is handled by DTDA's Compliance & Management Coordinator who is instructed to report directly to DTDA's Chairman of the Board if the received report implicates the DTDA Director.

All reports will be handled with confidentiality, and no organisation or person reporting in good faith will be subjected to any kind of reprisals for submitting information pertaining to this policy. DTDA's management shall do its best to ensure that all staff feel able to submit a report without fear of reprisals, and loyalty towards colleagues or the workplace must never lead to instances of abuse, exploitation or harm of children going unreported. Similarly, DTDA shall, to the best of its abilities, ensure that partners and other external stakeholders feel able to submit a report without fear of reprisals.

If DTDA should receive an anonymous report, this will be treated with the same degree of seriousness as a report submitted by an identifiable sender. However, the person reporting the case of abuse, exploitation or harm of a child should be aware that anonymous reports are much harder to investigate and less likely to lead to conclusive and actionable findings.

Any reports involving managerial staff of the DTDA shall be brought to the attention of the DTDA Chairman of the Board.

4.2 Reporting by survivors

DTDA shall apply a survivor-centred approach, which means that priority is given to the safety, rights, needs and wishes of children who have experienced abuse, exploitation or harm committed by a DTDA employee or representative or by a DTDA partner. The approach also implies that survivors are treated with dignity and respect, and that they are empowered to participate in all decisions that affect them. Finally, it means that DTDA shall provide the necessary assistance and support, such as counselling or psychological treatment, to any survivor of abuse, exploitation or harm committed by an employee or representative of DTDA.

Any child who experiences abuse, exploitation or harm committed by an employee or representative of DTDA or by a DTDA partner is strongly encouraged to report this to DTDA. DTDA will treat all reports seriously, regardless of the context of the reported instance or the persons involved, and the organisation shall ensure that all reported cases are duly investigated.

Reporting can be done to the Head of DTDA's Sub-Regional Office (at country level) or to a Head of Department or the Director at DTDA Head Office (in Denmark).

Alternatively, reporting can be done by use of DTDA's whistleblowing/complaint mechanism which can be found [here](#) on DTDA's website, or by writing directly to: complaint@dtda.dk. The whistleblowing/complaint mechanism is handled by DTDA's Compliance & Management Coordinator who is instructed to report directly to DTDA's Chairman of the Board if the received report implicates the DTDA Director.

All reports will be handled with high confidentiality, and the number of people involved in the follow-up will be kept to a minimum. Unless the reported instance concerns the holders of either of these functions, the DTDA Director, the Compliance & Management Coordinator and the PSEAH focal point will always be involved in the follow-up on any reports concerning abuse, exploitation or harm of children.

If DTDA should receive an anonymous report, this will be treated with the same degree of seriousness as a report submitted by an identifiable sender. However, the person reporting the instance of abuse, exploitation or harm should be aware that anonymous reports are much harder to investigate and less likely to lead to actionable conclusions.

There shall be no reprisals for anyone who truthfully reports an incident of abuse, exploitation or harm, including in cases where a subsequent investigation turns out to be inconclusive.

Any reports involving managerial staff of the DTDA shall be brought to the attention of the DTDA Chairman of the Board.

4.3 Investigations and subsequent follow-up actions

DTDA shall ensure a prompt, thorough and appropriate investigation of all reports abuse, exploitation or harm of children, regardless of how the information has reached the organisation.

Unless a reported case involves the persons holding these functions, the DTDA Director shall, in consultation with the Compliance & Management Coordinator and the PSEAH focal point, undertake an immediate risk-assessment concerning the safety and wellbeing of the survivor(s) in question and initiate an investigation of the reported allegations. In order to ensure that a survivor-centred approach is consistently applied throughout the process, DTDA shall make use of a Standard Operating Procedure (SOP) for the management of all reports concerning abuse, exploitation or harm of children.

If DTDA receives a report with allegations concerning abuse, exploitation or harm of a child committed by a staff member of one of DTDA's partners, DTDA shall, as pertinent, collaborate with the management of the given organisation with an eye to making sure that a prompt, thorough and appropriate investigation is carried out and that relevant follow-up is guaranteed.

Depending on the findings of any investigation commissioned or carried out or by DTDA itself, the DTDA Director shall decide on the appropriate course of action and communicate this to the involved parties, with particular attention to the protection needs of the survivor(s) involved. If the investigation concludes that abuse, exploitation or harm of a child has taken place, DTDA shall:

- Ensure that prompt and decisive disciplinary action is taken against the person(s) who have committed the abuse, exploitation or harm of a child.
- Support the reporting of the case to the police and other relevant authorities, if the survivor (in consultation with his/her guardian) decides to do so, and contribute to the ensuing official investigation by making relevant information and documentation available.
- Offer relevant psychosocial or other type of support to the survivor, in accordance with his/her needs and wishes.
- Ascertain whether there is a need for enhanced preventive measures, e.g. through strengthened procedures, training of staff or capacity building of partners.

Finally, the DTDA Director shall ensure that the Chairman of the Board is notified in confidentiality about the final outcome of the investigation and the respective actions that will be pursued by DTDA, in accordance with the points set out above.

5. Monitoring

DTDA shall ensure periodic monitoring of the application of this policy at all relevant levels, including through monitoring visits and partner meetings.