

ZOE International: Child Protection Policy

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Version 5.4

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1. INTRODUCTION

1.1 Why Does ZOE have a Child Protection Policy?

- 1.1.1 ZOE is committed to the safety, welfare and protection of all children entrusted to its care. All paid part-time and full-time staff and volunteers at ZOE undertake to do everything in their power to create a safe, nurturing environment for children and to prevent all forms of abuse. ZOE is committed to acting at all times in the best interests of children, seeing these interests as paramount.
- 1.1.2 ZOE cares for children as they develop the cognitive ability and maturity to make informed choices. As a child's brain develops, children may lack judgment, problem-solving skills, the ability to emotionally learn and high-level self-regulation. Traumatic stress in childhood can have a broad range of effects on brain function, structure and neuropsychological components of memory.
- 1.1.3 ZOE opposes all forms of child exploitation and abuse (see section 4.3, 4.4 for definitions of abuse and exploitation). Further, ZOE believes that keeping silent about known or suspected exploitation or abuse is wrong. ZOE believes that all children have a right to protection from exploitation and abuse irrespective of race, social background, gender, skin color, disability, religion, or beliefs.
- 1.1.4 ZOE strives to establish and have in place preventative policies and procedures to proactively combat all potential child exploitation and abuse. ZOE is aware of the need to make explicit our determination that our work and activities must promote the safety and security of children at all times. This policy will strengthen, enhance and highlight the integrity of ZOE.
- 1.1.5 ZOE also acknowledges the United Nations Convention on the Rights of the Child (CRC).
- 1.1.6 ZOE acknowledges the fact that all children linked with ZOE could potentially be at risk from abusers drawn to visit and work with us.

1.2 How are children represented in media?

- 1.2.1 ZOE requests that the following statement be legible on all media including; reports, videos, newsletters and presentations:

*"ZOE protects the **identity** and **dignity** of children and does not show trafficked children."*

ZOE protects the **identity** of children because they are often in danger of people wanting to do them harm as they may be witnesses as part of the prosecution process or maybe sought after by individuals or organizations that have previously been involved in trafficking them.

ZOE protects the **dignity** of children because others may have exploited them. We do not want to cause embarrassment or shame to a child by using their picture publicly. We do not want to exploit them by using their face as a means for fundraising. ZOE advocate for children. We seek to protect survivors of child trafficking, and protect the identity and dignity of all children. We will not use another child's face as a substitute for a victim of human trafficking in media. ZOE will only use consenting adult actors, and will clearly identify the media as a depiction.

2. SCOPE

2.1 This policy applies to everyone coming into contact with ZOE children.

This includes (but is not limited to):

1. Paid staff (full-time and part-time)
2. Volunteers (full-time and part-time)
3. Trainers and Tutors of children in ZOE programs
4. Contractors and Laborers
5. Overnight Visitors
6. Visitors And Guests (1 day or less)
7. Short-Term Teams (multiple day visits)
8. Interns

2.2 This policy will be posted on ZOE International's website and made available to any interested parties who desire to know ZOE's commitment to child protection.

2.3 This policy will be subject to review and approval by the Board of Directors of ZOE International. The Board of Directors will hold ZOE accountable to the stipulations contained in this policy.

3. PURPOSE

3.1 Articulates ZOE's commitment to the protection of all children from abuse and exploitation of all kinds.

3.2 Safeguards that those involved with ZOE and its activities are not contributing to child exploitation of any kind.

3.3 Clarifies expectations of behavior and good practice when working with children.

3.4 Informs those involved with ZOE what should be done if they have a concern about a child's well-being or suspect that a child is being abused or exploited in any way.

3.5 Protects ZOE staff, team members, associates, volunteers, member agencies and visitors from false accusations and allegations.

3.6 Protects the reputation of ZOE International as an organization.

4. DEFINITIONS

4.1 Child – Individuals under the age of 18 years old.

4.2 ZOE Child / ZOE Children – Individuals or children under the age of 18 years old who are currently in a ZOE program.

4.3 Abuse

4.3.1 Physical Abuse – Actual or likely physical injury or failure to prevent physical injury or suffering. This includes (but is not limited to): deliberate hitting, beating, shaking, throwing, burning, drowning, suffocating or poisoning.

4.3.2 Mental / Emotional Abuse – Actual or likely severe adverse effect on the emotional and behavioral development of a child caused by persistent or severe emotional ill treatment or rejection. May involve conveying to the child that they are worthless, unloved or inadequate and causing children to feel frightened, in danger or corrupted.

4.3.3 Neglect – The persistent or severe neglect of a child or the failure to protect a child from exposure to any kind of danger, including cold and starvation, or extreme failure to carry out important aspects of care resulting in the significant impairment of the child's health or development, including non-organic failure to thrive.

4.3.4 Sexual Abuse – Actual or likely abuse of a child representing the involvement of children in sexual activities. This includes (but is not limited to): touching a child's genitals or private areas (i.e., breasts), forcing a child to watch or take part in pornography or coercing a child to participate in sexual acts. These acts constitute sexual abuse whether or not the child consents. Additionally, sexual abuse includes any form of suggestive behavior, indecent exposure, flirtation towards a child or sexually explicit discussions/dialogue.

4.3.5 Spiritual Abuse – When a religious leader or someone in a position of religious power or authority (whether organization, institution, religious organization or family) misuses their power or authority or the trust placed in them with the intention of controlling, coercing, manipulating, or dominating a child. Spiritual abuse is always about the misuse of power within the framework of religious belief or practice in order to meet the needs of the abuser at the expense of the needs of the child. Spiritual abuse results in religious harm to a child and may be linked to other abuse, such as physical, emotional and sexual abuse.

4.4 Exploitation

4.4.1 Sexual Exploitation – Contact or interactions between a child and an older or more knowledgeable child or adult (a stranger, sibling or person in a position of authority, such as a parent or caretaker) when the child is being used as an object of gratification for an older child's or adult's sexual needs. These contacts or

interactions are carried out against the child using force, trickery, bribes, threats or pressure.

4.4.2 Commercial Sexual Exploitation – Criminal practices that demean, degrade and threaten the physical and psychosocial integrity of children. There are three primary and interrelated forms of commercial sexual exploitation of children (CSEC): prostitution, pornography and trafficking for sexual purposes. CSEC is the use of a child for sexual purposes in exchange for cash or in-kind favors between the customer, intermediary or agent and others who profit from the trade in children for these purposes (parent, family member, procurer, teacher). CSEC can take various forms including:

1. prostitution of children;
2. child pornography;
3. child sex tourism;
4. trafficking and sale of children across borders and within countries for sexual purposes; and
5. other forms of transactional sex.

CSEC also potentially includes arranged or forced marriages involving children under the age of 18 years, where the child has not freely consented to marriage and where the child is sexually abused.

4.4.3 Forced Labor / Economic Exploitation – Requiring any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development. Forced labor may include, but is not limited to:

1. prostitution;
2. domestic servitude;
3. debt bondage;
4. begging;
5. agricultural, industrial, or service labor;
6. trafficking and sale of children across borders and within countries for forced labor; and
7. military conscription or service.

5. STANDARDS OF CONDUCT

5.1 All visitors, guests, and short-term teams are required to be escorted at all times by a ZOE paid staff or full-time volunteer that has passed screening process. Visitors and guests are required to sign-in and present a valid ID card. Visitors and guests will have sleeping accommodations separate from ZOE children. Refer to Visitor guidelines.

5.2 Individuals listed in Section 2.1 (excluding visitors, guests, contractors and laborers) who will come into contact with ZOE children must sign a statement representing the following:

5.2.1 They have read and understand the ZOE Child Protection Policy.

- 5.2.2 They agree to all of the requirements as stipulated by this policy.
- 5.2.3 They submit to any investigatory or disciplinary actions that will result from an apparent or actual breach of any part of the policy.
- 5.2.4 They submit to screening as stipulated by Section 6.
- 5.3 ZOE children will be treated with respect and dignity.
- 5.4 ZOE children will not be touched or treated in a way that is against the Convention on the Rights of the Child.
 - 5.4.1 The general guideline is not to touch children in areas that would normally be covered by shorts and t-shirt.
 - 5.4.2 No lap-sitting for extended periods of time.
 - 5.4.3 No inappropriate tickling.
 - 5.4.4 Refer to the definitions of sexual and physical abuse in Section 4.3.
- 5.5 ZOE children will be disciplined and corrected in a way that is consistent with the Convention on the Rights of the Child. ZOE has a zero tolerance policy for any form of violence against children. Visitors shall not discipline any child. Any concerns of improper behavior by children shall be reported to staff.
- 5.6 ZOE children will be supervised by a minimum of either: 1) one paid staff; or 2) one school staff; or 3) one full-time volunteer.
- 5.7 A ZOE child under the age of 4 can be one-on-one with a female full-time volunteer or female staff member.
- 5.8 ZOE children aged 4 years old and over are NEVER to be alone with an adult (one-on-one) in any place that is not readily accessed by others. Exceptions are as follows:
 - 5.8.1 Medical conditions in which a child needs to be separated from other children and needs constant supervision. One-on-one supervision will be limited to female staff or volunteer only.
 - 5.8.2 Special exceptions may be made for members of the child's immediate family, i.e., the child's blood relatives.
- 5.9 Travel
 - 5.9.1 Children aged 12 years old and under must NEVER be alone OR one-on-one with an adult. A second adult must accompany the child for travel.
 - 5.9.2 Children aged 13 years old and over
 1. Private Vehicles/ZOE Vehicles - Two or more ZOE children of the same gender can be accompanied by one adult of the same gender for vehicular travel.
 2. Public Transport - One adult can accompany ZOE children of the same

gender on public transport.

5.9.3 Exceptions are permitted for life threatening medical emergencies.

5.10 No flirtatious, suggestive or inappropriate behavior or mannerisms toward a ZOE child is permitted.

5.11 Child protection will be heavily considered as part of the risk analysis and health/safety arrangements in all ZOE events and off campus activities. All events involving ZOE children will be supervised by at least two adult volunteers or paid staff with the exception of school-related activities.

5.12 NO photographs or video footage is permissible without authorization from the ZOE Child Protection Manager. The use and distribution of authorized photographs or video footage at ZOE is subject to regulations in Section 10 of this policy.

5.13 NO gifts or promise of gifts will be given to ZOE children without authorization from the ZOE Director. Example of gifts include (but are not limited to): money, cell phones, cell phone usage, candy, jewelry, personal items, alcohol, drugs, medications, or promise of any of the items listed.

5.14 NO pre-visit or post-visit contact (letters, emails, phone calls, text messages, video, packages, etc.) is allowed with ZOE children without authorization from the ZOE Director.

5.15 The modest dress code ZOE has adopted is based on the complexity of the situations that children have been rescued from. Children have often times been in situations where they were exposed or forced to wear minimal clothing, or where tattoos were used to brand them as the property of their trafficker. Because of this ZOE paid staff (full-time and part-time), volunteers (full-time and part-time), trainers and tutors of children in ZOE programs, contractors and laborers, overnight visitors, visitors and guests (1 day or less), short-term teams (multiple day visits), and interns must adhere to a modest dress code at all times:

1. No see through tops or skirts without proper undershirts or slips.
2. Shorts and skirts must come approximately to the knee.
3. No cleavage, bra straps, underwear or midriff showing at any time.
4. Straps on sleeveless tops must be 2" wide.
5. No "extra tight" fitting tops or pants.
6. Offensive tattoos must be covered.

6. RECRUITMENT AND SCREENING

6.1 Individuals listed in Section 2 (excluding visitors, guests, contractors and laborers) are subject to screening and a probationary period. Screening may include completion of the following:

1. In-person, phone, or live video feed interview

2. Detailed application
 3. Reference checks
 4. National criminal background check via a reputable agency
 5. Signed agreement to abide by ZOE's Child Protection Policy
 6. Physical examination
- 6.2 All screening and related findings will be reviewed by ZOE's CEO and/or President, ZOE Founders or qualified designee (i.e., other ZOE officer).
- 6.3 Personnel records will be maintained confidentially at ZOE headquarters.

7. TRAINING

- 7.1 The following individuals will be required to complete ZOE-provided training to implement the Child Protection Policy before signing the agreement pursuant to Section 5.2.
- 7.1.1 Paid staff (full-time and part-time)
 - 7.1.2 Volunteers (full-time and part-time)
- 7.2 The following individuals will be required to be briefed on the details of the Child Protection Policy before signing the agreement (briefing will be conducted before contact with ZOE children):
- 7.2.1 Short-Term Teams
- 7.3 All ZOE Children will be continuously educated on the forms and nature of abuse and inappropriate behavior. Additionally, they will be educated and trained annually on information contained in this policy.

8. EVALUATION AND MONITORING

- 8.1 ZOE is committed to the ongoing monitoring and evaluation of child protection procedures and behavior protocols pursuant to this policy. Furthermore, ZOE highly encourages open communication between all individuals listed in Section 2.
- 8.2 At least once per year, the following individuals will be subject to evaluations directly related to standards set forth in this policy:
- 8.2.1 Paid staff (full-time and part time)
 - 8.2.2 Volunteers (full-time and part time)

Concerns, suspicions or allegations that arise from the evaluation and monitoring process

will be handled pursuant to Section 9.

9. RESPONSES TO ALLEGATIONS/SUSPICIONS

- 9.0 ZOE recognizes that allegations (i.e., when a specific accusation of abuse is made against a named individual) and suspicions (i.e., when a concern is expressed about abuse that may have taken place) should always be investigated and acted upon swiftly, making the welfare of the child/children the paramount consideration.
- 9.1 ZOE will provide training and easy access for children to report misconduct/abuse or to talk with other responsible person(s) about concerns.
- 9.2 ZOE will provide at least one conduit (a locked box) to receive anonymous comments, allegations or suspicions to be investigated. Allegations relating to the safety or protection of the child/children will be compiled and personally addressed by ZOE executives and/or the Child Protection Manager. Additionally, the Board of Directors can request to review all anonymous comments, allegations, suspicions and related resolutions.
- 9.3 All allegations and suspicions will be investigated and responded to in a timely manner. Allegations and suspicions will be investigated by ZOE executives and/or Child Protection Manager or designee. If the CEO or President is the subject of the allegation or suspicion, the Board of Directors will investigate.
- 9.4 When an allegation or suspicion is communicated, the following procedure is followed. The severity of the allegation or suspicion will determine the process length and number of steps required.
- 9.4.1 Allegations/suspicions are communicated to the executives and Child Protection Manager. The information will be kept confidential except for those directly involved.
- 9.4.2 Investigations will be conducted and brought to a resolution, once the facts have been ascertained, by executives and/or Child Protection Manager or designee.
- 9.4.3 All parties including the reporter, alleged victim, and alleged perpetrator will be treated with respect and dignity from the start of the process to the end. The reporter's and alleged victim's identity will be kept confidential.
- 9.4.4 The alleged perpetrator will be separated from ZOE children during the investigation. The protection of the alleged victim during and after the investigation process will be considered of paramount importance.
- 9.4.5 Disciplinary action(s) will be based on the severity of the misconduct or crime(s) involved. Legal authorities and respective embassies will be involved if considered

necessary or required by law.

9.4.6 If misconduct or abuse has been identified, ZOE will provide the appropriate support to the victim including external counseling if warranted.

9.4.7 Parents and/or caretakers will be notified of misconduct, crimes, and resolutions as appropriate.

9.4.8 The allegation/suspicion and all pertinent information (i.e., interview notes, resolution, disciplinary action, etc.) will be logged and maintained in a confidential file. Record of the allegation/suspicion will be kept in the appropriate personnel files.

9.4.9 Allegations/suspicions and respective resolutions will be summarized for review by the Board of Directors on a regular basis.

10. FUNDRAISING / PUBLICITY PROTOCOLS

10.1 ZOE highly values the protection of privacy, identity, and dignity of all children and survivors of human trafficking under its care.

10.2 ZOE requests that the following statement be legible at the beginning of reports, videos, newsletters and presentations:

ZOE protects the identity and dignity of children and does not show trafficked children.

10.3 All fundraising or publicity activities are subject to ZOE's Media Guidelines.

10.3.1 Summary of Media Guidelines:

- No faces of children who are in ZOE temporary, short-term or long-term programs can be shown in any media.
- Faces 'in a crowd' or a group of children can be shown in media, at events such as; ZOE trafficking prevention campaigns, education programs, schools or outreaches.
- If there could be any misunderstanding as to whether a child or adult depicted in a photo is or could have been a victim of trafficking, the face must be *concealed.
- ZOE staff and volunteers must provide context when posting on their personal social media accounts to prevent misunderstanding.
- Fundraising/Publicity protocols apply to all media that depicts or describes children whether or not they are under ZOE's care.
- ZOE does not allow children to be interviewed on or off camera for media purposes.

*If an adult survivor willingly chooses to share their story, written consent will be obtained prior to interviewing the survivor.

10.4 Fundraising/Publicity protocols apply to all print materials, electronic media, and presentations that depict or describe child victims of human trafficking or any child under ZOE's care.

10.4.1 Print Materials: Photos, brochures, newsletters, flyers, business cards, postcards, etc.

10.4.2 Electronic Media: Television, radio, computer, internet, websites, blogs, social networking sites, emails, photos, videos, etc.

10.4.3 Presentations: Any presentation whether electronic, printed, or oral.

10.4.5 These protocols extend to all materials, media, and presentations whether ZOE-sponsored or not.

10.5 ZOE will protect the privacy, identity and dignity of children in materials and media listed in Section 10.4 as follows:

10.5.1 All photos, videos or images used must conceal the child's identity.

This includes the child's face, identifying marks (e.g., distinctive scarring, tattoos, etc.) or revealing geographic cues (e.g., background, environment, signage). Non-identifying approved photos and videos are available upon request

10.5.2 Actual names of children and/or specific geographic locations will not be used in any media issued whereby Section 10.5.1 is applicable. Only fictitious names will be used.

10.6 No photographs or video footage is permissible on ZOE premises or ZOE-sponsored activities without direct authorization from the ZOE Child Protection Manager.

10.7 Only authorized ZOE personnel can take photos or videos with ZOE authorized equipment.