

Safeguarding Policy

Level 1 – Policy



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1 Purpose and Scope

Safeguarding is a commitment and a set of practical measures that the Norwegian Refugee Council (NRC) adopts to promote the safety and wellbeing of everyone involved in the delivery and receipt of NRC's assistance and programmes.

The purpose of this policy is to define the commitment and measures to protect NRC representatives and the people NRC works with or comes into contact with from all forms of harm that might result from their involvement in or contact with the organisation.

The policy serves as an umbrella policy, covering aspects of both Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) and child safeguarding integrated into one policy. It addresses harm resulting from physical abuse, emotional abuse, harassment, bullying or neglect, sexual misconduct including sexual exploitation, abuse and sexual harassment or other forms of exploitation such as child labour.

NRC has a zero-tolerance approach to inaction against exploitation and abuse, and specifically sexual exploitation and abuse and sexual harassment, and will take action to prevent and respond to such abuse and hold accountable those who do harm.

The policy sets out:

- The principles underpinning NRC's safeguarding work
- NRC's commitments to prevent, mitigate and respond to all forms of abuse and exploitation, especially sexual exploitation abuse and harassment.

The following is annexed to the policy:

- Annexe 1- Behaviour Protocols

The Behaviour Protocols include behaviour requirements of NRC representatives during and outside working hours and while on leave. They apply in all locations, on and off duty, online and offline while associated with NRC or visiting NRC programmes or country offices. The Code of Conduct requires compliance with NRC policies, as such all signatories to the Code must comply with the Behaviour Protocols. Project participants should be made aware of the behaviour requirements and expect that NRC representatives will act in accordance with them.

The *Minimum Safeguarding Requirements* support this policy and must be read and understood by all categories of NRC representatives, as defined below. NRC shall ensure that partners and suppliers understand the requirements that apply to them. This policy is a Level 1 governing document and applies globally.¹

2 Definitions

NRC's approach to safeguarding requires all staff to understand basic concepts. The terms, set out below, are used when communicating on safeguarding issues within the organisation:

Term	Definition
Abuse	is harm to a person's safety, wellbeing, dignity, or development and includes but is not limited to physical, emotional, and sexual harm, harassment, and neglect.
Accountability (to affected people) ²	an active commitment and process of humanitarian actors to use power responsibly by giving account to, taking account of, and being held to account by different stakeholders, and primarily those who are affected by the exercise of such power.
Adult-at-Risk	is any person who is aged 18 years or over and at increased risk of exploitation, abuse, or neglect because of their need for care and or support.
Assent/Dissent ³	is agreement given by a child or adult who is not capable of giving consent and requires the consent of a caregiver or legal guardian. Assent means that they agree to an action, dissent means that they do not.
Best Interests of the Child ⁴	is a principle based on Art. 3 of the UN Convention on the Rights of the Child, which says that "in all actions concerning children [...] the best interests of the child shall be the primary consideration." When assessing what is in the best interests of a child/ren in a specific situation, elements to balance include: the views of the child (in consideration of their age and maturity), safety and protection of the child (which has priority because exposure or likely exposure to harm usually outweighs other factors), family and close relationships of the child, development (health and education) and identity needs of the child
Caregiver ⁵	describes the person who is exercising day-to-day care for a child or children. He, she, they/them is a parent, relative, family friend or other guardian; it does not necessarily imply legal responsibility.

Child ⁶	is any person under the age of 18 years, regardless of the age of majority or age of consent locally.
Exploitation ⁷	is the abuse of power or trust, to use a person for the benefit of another using force, coercion, abduction, deception, manipulation, or other means of abuse of trust or power. Exploitative behaviour includes, but is not limited to, sexual exploitation, human trafficking, child labour, slavery, and child marriage/early and forced marriage.
Informed Consent	<p>means providing permission, agreeing, or authorising with a clear understanding of the facts, implications, and potential consequences of an action.</p> <p>Age recommendations for informed consent and assent procedures can vary depending on areas of work. They need to be based on the child's best interests. For the participation in an investigation NRC will need to obtain assent and informed consent from the caregiver for children below 18 years of age. Age of consent for data processing is 16 years of age as per NRC's Data Protection Policy.</p>
IASC (MOS) ⁸	Inter-Agency Standing Committee (Minimum Operating Standards for PSEAH)
Minimum Safeguarding Requirements	are minimum requirements to be met by NRC functions and for allegation response. The Minimum Safeguarding Requirements are outlined in a separate level two document that support the implementation of this policy.
NRC representatives	are employees, board members, consultants, incentive or contingent workers, interns, volunteers, official project visitors, NORCAP staff including experts, unless otherwise specified in a NORCAP deployment contract to a partner organization.
Partners	are organisations and entities that NRC forms a formal relationship with. Often, these are organisations that implement certain projects on behalf of or alongside NRC.
Policy	this Safeguarding Policy
PSEAH ⁹	Protection from Sexual Exploitation and Abuse and Harassment
Safeguarding ¹⁰	is a commitment and a set of practical measures that NRC adopts to promote the safety and wellbeing of everyone involved in the delivery and receipt of NRC's assistance and programmes, and to protect them from all forms of harm that might result from their involvement in or contact with the organisation

Safeguarding Principles	key principles that outline responsibility and guide practical safeguarding measures as described in this policy
Sexual Misconduct	is an overarching term that refers to all types of sexual abuse, sexual exploitation or sexual harassment that NRC representatives are alleged to have carried out or been subjected to during the time they represent NRC.
Suppliers	are persons, contractors or entities from which NRC purchases goods or services. For this policy, consultants can fall into the category of suppliers or NRC representatives based on the type and degree of involvement in NRC's programming.
Subject of Concern	refers to an individual who is accused of carrying out (or attempting to carry out) misconduct.
Survivor	refers to an individual who has experienced actual or attempted abuse or exploitation, including non-sexual and sexual abuse, exploitation or harassment
Survivor-Centred ¹¹	means ensuring a supportive environment in which the survivor's rights are respected, safety and well-being is ensured, and the survivor is treated with dignity and respect.

3 Safeguarding Principles

NRC's commitment to promote safety and wellbeing of all involved in the delivery or receipt of assistance (safeguarding) is achieved by following key principles that outline responsibility and guide practical measures. NRC shall integrate these principles into all aspects of NRC's work.

Collaboration with other actors, including national authorities or organisations in which NORCAP experts are seconded, shall be guided by these principles.

3.1 NRC shall Do-No-Harm

NRC shall avoid exposing any person to further harm because of our actions or inactions. Measures to prevent and mitigate harm shall include, but are not limited to:

- prioritising safety and security for any person impacted by or involved in safeguarding allegations; and/or managing allegations of forms of abuse or exploitation by NRC representatives, partners and suppliers
- treating people with respect and in consideration of their rights and dignity
- ensuring information received is shared on a strictly need to know basis
- providing equal access to support and fair treatment for any person impacted by and/or managing safeguarding allegations.

3.2 NRC shall be accountable, clear, and transparent in meeting safeguarding requirements

NRC shall be accountable, clear, and transparent in how the Behaviour Protocols and the *Minimum Safeguarding Requirements* are met. NRC shall ensure that:

- NRC representatives and others that NRC collaborates with are made aware of expected behaviour and enabled to report unacceptable behaviours
- project participants are made aware of what they can expect of NRC representatives' behaviours and are enabled to report
- NRC functions fulfil safeguarding requirements

- all complaints/allegations are responded to in a timely, appropriate, fair and equitable manner as outlined in relevant guidance on Complaints and Feedback and NRC's Speak Up Policy
- safeguarding data and processes are transparently and safely documented and communicated in line with the NRC Data Protection Policy to build trust in NRC's systems and facilitate learning.

3.3 NRC shall follow a survivor-centred approach to allegation management

NRC shall ensure a supportive environment throughout its investigative or non-investigative responses to safeguarding allegations. This means NRC shall:

- place the survivor at the centre of all actions taken
- ensure the safety and/or protection from retaliation and further harm of survivors, witnesses and others involved in allegation processes
- respect a survivor's choice not to participate in, or stop taking part in, an investigation and prioritise the well-being, rights and needs of the survivor
- ensure appropriate use of information obtained through informed consent or assent
- enable access to support services through referral pathways including health, psychosocial, legal support and safe shelter, based on the needs and wishes of survivors. Witnesses, whistleblowers and the subject of concern will also be enabled to access support
- ensure that the best interests of the child will be the primary consideration for child-related allegations. This includes evaluating if and how children participate in an investigation or fact-finding process.

3.4 Safeguarding in NRC shall be inclusive, participatory, and collaborative

This means NRC shall:

- recognise issues of gender, power, and privilege and ensure the participation of diverse groups of NRC representatives and project participants in designing effective and accessible prevention activities and reporting channels
- ensure that all groups, including children and adults-at-risks, understand how to report safeguarding concerns
- collaborate with other actors to promote safer environments to prevent exploitation, abuse and harassment.

4 Safeguarding Commitments

The safeguarding commitments are concrete actions that NRC shall take to show how safeguarding and this policy's principles are carried out.

4.1 NRC shall foster a safeguarding culture within the organisation

NRC shall foster a safeguarding culture by integrating this policy's principles, behaviours and *Minimum Safeguarding Requirements* across all aspects of NRC's work. When necessary, NRC shall use safeguarding lessons learned to create tools and procedures that enable all NRC offices to foster a safeguarding culture.

4.2 NRC shall define clear safeguarding roles and responsibilities

NRC shall ensure responsibilities for safeguarding are clearly defined and assigned to relevant functions in line with the Roles and Responsibilities in Section 5 of this policy and the function specific requirements in the *Minimum Safeguarding Requirements*.

4.3 NRC shall ensure sufficient resources for safeguarding

NRC shall ensure sufficient resourcing to mainstream safeguarding throughout the organisation in accordance with *Minimum Safeguarding Requirements*.

4.4 NRC representatives shall be held accountable to follow the Behaviour Protocols

The NRC Code of Conduct shall include reference to the Behaviour Protocols in Annex 1. In signing the Code of Conduct, NRC representatives commit to abiding by these behaviour expectations. NRC representatives shall be held accountable by senior management if they do not follow them.

4.5 NRC shall ensure safe recruitment practices

NRC shall ensure that safeguarding measures are included in all recruitment processes. This means behaviour expectations are referenced in job advertisements and descriptions, interviews, reference, and background checks and in contracts.

4.6 NRC shall ensure awareness of safeguarding requirements

NRC shall ensure that safeguarding is a mandatory part of the induction process with clear guidance on the Code of Conduct referencing the Behaviour Protocols in Annex 1 and the Speak Up procedures.

4.7 NRC shall require partners and suppliers to meet adequate safeguarding standards

NRC shall ensure that partners and suppliers have adequate safeguarding standards in place.

- Partners shall choose to adopt this policy or have or develop their own policy and procedures that meet the standards of this policy.
- Suppliers, at minimum, are made aware, sign and held accountable by the Ethical Standards Declaration. NRC shall act if this declaration is breached.
- NRC shall clarify safeguarding obligations in contracts and assess and support partners to meet *Minimum Safeguarding Requirements*. NRC shall act if partners fail to do so.

4.8 NRC shall design and implement safe programmes and projects

NRC shall identify, analyse, and mitigate safeguarding risks when designing, implementing, monitoring, and evaluating programmes and projects.¹²

- NRC shall ensure that the communities NRC works with are aware of and understand the required behaviour of NRC representatives and know how to complain if requirements are not met.
- Community-based Complaint and Feedback Mechanisms (CFMs) shall integrate appropriate, accessible, and confidential reporting channels for safeguarding concerns.

4.9 NRC shall respond to allegations of all forms of abuse and exploitation including sexual exploitation & abuse and sexual harassment

All safeguarding allegations, which may also include allegations of workplace bullying and harassment, shall be responded to following the Safeguarding Principles and shall be addressed in a timely, fair, and consistent way as per NRC's Speak Up Policy and procedures and allegation response requirements in the *Minimum Safeguarding Requirements*.

5 Roles and Responsibilities

Everybody in NRC has safeguarding responsibility. The following roles hold specific responsibilities.

5.1 NRC board

The NRC Board shall promote a safeguarding culture and hold overall organisational accountability for safeguarding. The Board needs to assure itself that the organisation does everything possible to meet its safeguarding commitments.

5.2 NRC management

NRC managers shall model and promote a safeguarding culture. This means leading by example and integrating safeguarding in all areas of work, across functions and in performance plans. NRC managers shall ensure the implementation and awareness of the Behaviour Protocols and the *Minimum Safeguarding Requirements*.

The Senior Management Group shall:

- hold regional, representation and NORCAP management groups to account for the implementation of this policy
- ensure resources are allocated for prevention and survivor-centred response through funding, human capacity and provision of material or training.

Regional management groups shall:

- hold country management groups to account for the implementation of this policy
- ensure resources are allocated for prevention and survivor-centred response through funding, human capacity and provision of material or training
- ensure survivor-centred allegation management and response.

Country management groups shall:

- contextualize this policy, the Behaviour Protocols and the *Minimum Safeguarding Requirements* including analysis against cultural and legal context and translation into further local languages, if necessary
- ensure survivor-centred allegation management and response.

5.3 NRC representatives and functions

All NRC representatives shall:

- comply with the Code of Conduct, including the behaviour protocols outlined in Annex 1,
- apply the principles of this policy,
- cooperate in safeguarding investigations.

All functions shall implement role specific responsibilities as outlined in the *Minimum Safeguarding Requirements*.

Annexe 1 – Behaviour Protocols

NRC representatives shall comply with the following behaviour protocols in all locations, online and offline, at all times, including outside working hours and while on leave.

NRC does not tolerate NRC representatives exploiting or abusing people. NRC representatives found to have been involved in abuse or exploitation, including sexual misconduct, will be subject to disciplinary measures up to and including dismissal.

1 General behaviour protocol

Treat everyone with respect and dignity.

Respect means showing care, consideration, and concern for the needs and feelings of others, including:

- Respectful language and behaviour.
- Respect for others' views, opinions, and lived experiences.
- Asking permission before collecting or sharing personal data, including on health or disability status, or taking a person's photo.

Contribute to building a safe environment that prevents all forms of exploitation, abuse, and harassment.

- Ensure non-discrimination and inclusion of people from diverse backgrounds, communities, and groups e.g. race, ethnicity, origin, status, sex, gender identity, gender expression, sexual orientation, age, religious or political beliefs, disability or health status, neurodiversity, and socioeconomic background.
- Observe the safeguarding requirements for your function, in accordance with your role.
- Always declare to HR through a Conflict-of-Interest Declaration personal relationships which may be perceived as being exploitative or abusive. This must be kept in personnel files.
- The production, procurement, distribution, or use of pornographic material is prohibited on any NRC device, work environment or networks.

Never abuse.¹³

Abuse harms a person's safety, well-being, dignity, or development. Abuse can be intentional and sometimes unintentional. It includes but is not limited to:

- **Physical abuse**, the non-accidental use of physical force that causes a risk of or actual injury or suffering.
- **Emotional abuse**, harm done by persistent or severe emotional ill-treatment or rejection.
- **Bullying**, the persistent, repeated, and targeted mistreatment of one or more persons, by one or more perpetrators.
- **Harassment**, any behaviour that is unwelcome, targeted and that can reasonably be perceived to cause offence or humiliation and results in a hostile environment.
- **Neglect/negligence**, the failure to meet the duty of care causing actual or a risk of significant harm.

Never engage in sexual misconduct.

Sexual misconduct includes, but is not limited to:

- **Sexual abuse**, an actual or threatened physical violation of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual exploitation**, any actual or attempted abuse of a person's vulnerability or difference in power, or abuse of their trust for sexual purposes, including, but not limited to gaining money or benefiting socially or politically from the sexual exploitation of another person.
- **Sexual harassment**, any unwelcomed or non-consensual sexual advance, request, sexual language, message, or behaviour that makes the person feel uncomfortable, offended, humiliated, or intimidated and impacts the person's personal or professional environment.

Specifically:

- **No sexual activity with children.** Sexual activity with anyone under the age of 18 is not allowed, even if it is legal in country of assignment or origin. Not knowing their age is not an excuse.
- **No sexual activity with project participants or anyone receiving help from NRC.** Humanitarian workers are not allowed to take advantage of their position of power to develop sexual relationships with those receiving assistance.
- **No bribing or asking for sex or sexual favours in exchange for money, gifts, employment, services, assistance or opportunities.** Sexual activity with sex workers is not allowed even if legal in your/my country.
- No conduct that would constitute **sexual harassment**.

Never engage in other forms of exploitation.

This includes, but is not limited to:

- **Never benefit from forced or trafficked labour or other forms of labour exploitation** inside and outside of work.
- **Respect basic social rights** and working conditions according to international standards in respect to labour such as fair wages and benefits, adequate working conditions and times etc.
- **Never take advantage** of a person's vulnerable situation to exploit their labour.
- **Never employ children** (under the age of 18) in mentally or physically dangerous or hazardous work or work that interferes with schooling.¹⁴
- **Never knowingly obtain goods or services** (hotels, restaurants, party-venues, transport, and other service providers) from providers that employ children in mentally or physically dangerous or hazardous work or work that interferes with schooling.
- **Never employ** children under the age of 15 in full-time work including in household/non-workplace related work.¹⁵

Always report.

When you see, hear or suspect safeguarding concerns involving abuse, exploitation or sexual abuse, exploitation, and harassment, report it. To put an end to harm caused by our organisation, NRC must know about it! Therefore, you must:

- **Speak up** about safeguarding concerns within 24 hours, through
 - A trusted manager
 - speakup@nrc.no
 - Speak Up Form
- **Never investigate** matters yourself.
- **Speak up in good faith** – you must not make allegations that you know are false, malicious, untrue, or misleading.
- **Respect confidentiality** – never discuss the reported situation with others outside of those involved in handling the report. Breaches of confidentiality can lead to disciplinary action.

2 Safe engagement with children¹⁶

Adopt behaviour that prevents exploitation and abuse.

- Ensure physical contact is culturally, context, and age appropriate. Always consider verbal and non-verbal behaviours of a child that express discomfort to physical contact.

- Avoid being alone with a child project participant and if unavoidable take precautionary measures as appropriate.
- Do not take child project participants to your house or share a bed with them.
- Photos of individual children cannot be shared outside the specific use agreed, and not on personal social media platforms.
- Do not ask child project participants for personal contact details or share personal contact details unless authorised to do so for programme reasons.
- Do not engage in any practices that are harmful to children, expose them to any form of violence or engage children in or facilitate children's participation in any illegal activities.
- Ensure to be familiar with potential risks in your environment for children you work with, including accidents, and take action to mitigate these risks in accordance with your role.
- Ensure children you work with are aware of acceptable and unacceptable behaviour from NRC representatives.
- Ensure children you work with are familiar with child-friendly reporting mechanisms.
- Pay attention and speak up against unacceptable grooming behaviour of others.

Act when hearing about, seeing, or suspecting child exploitation or abuse, including neglect in the communities in which NRC works.

- Trust and believe in the child's story. Do not doubt, question, or investigate. Report all allegations from children.
- If the allegation involves an NRC person, or another aid worker, report it through the Speak Up system.
- If the allegation involves a community member, assess risk of harm to those involved and best interests of the child. When in best interests and safe, report to local child protection and social welfare departments or child protection entities.

3 Safe engagement with adults-at-risk

An adult-at-risk is any person who is aged 18 years or over and at increased risk of exploitation, abuse, or neglect because of their needs for care and or support.

- Do ask what a person might need instead of assuming. Consider that what is normal to you, might not be normal to others.
- Ensure information is accessible, culturally appropriate, clear, and simple.
- Enable a person to be supported or accompanied (for example by a caregiver or a friend) if requested or needed.

4 Safe communications¹⁷

- Ask for assent/informed consent before collecting or sharing personal or identifying information, including images, for work purposes as defined in the Data Protection Policy.
- Never share identifying or personal information that can put people at risk, unless you explain to them the risks and benefits of sharing the information, seek their informed consent and take mitigating measures.
- Show people in captured images in all media with respect and dignity, as a subject that is not victimised or exploited.
- Always anonymise any information shared with coordination groups, donors and/or the wider public.
- Ensure benefits of communication and research projects for project participants and community outweigh the risks of further harm.

The NRC Code of Conduct shall include reference to these Behaviour Protocols. In signing the Code of Conduct, NRC representatives commit to abiding by the above-described behaviour expectations.

Endnotes

¹ For this policy NRC has considered international standards and best practices as publicized by the IASC (MOS, PSEA Core Principles, Survivor Centered Approach), CHS Alliance, Safeguarding Resource and Support Hub and a number of leading international non-governmental organisations.

² <https://www.chsalliance.org/accountability-to-affected-people/>

³ To assent, the child must have the cognitive maturity to understand what they are asked for or required to do. Assent must be obtained from children unless the child is not capable of doing so. By asking for assent this will help them feel more in control and engaged in the different actions, especially when it comes to safeguarding concerns. It shows that they have a say in what happens to them and that their questions and input are valued. (adapted from Safeguarding Support Hub Jan 2024,

https://safeguardingsupporthub.org/sites/default/files/documents/RSH_Tip_sheet_Consent_and_assent.pdf

⁴ Adapted from Convention on the Rights of the Child and Committee on the Rights of Children, General comment NO 14 (2013) and UNHCR Best Interest Procedure Guidelines: Assessing and Determining the Best Interests of the Child (2021)

⁵ Adapted from Caring for Child Survivors of Sexual Abuse Guidelines, Second Edition 2023

⁶ <https://www.unicef.org/child-rights-convention>

⁷ CRS Policy on Safeguarding; revised version March 15, 2023.

⁸ <https://psea.interagencystandingcommittee.org/resources/minimum-operating-standards-mos-psea>

https://psea.interagencystandingcommittee.org/resources?f%5B0%5D=type_of_publication%3A_705

⁹ <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse-2019>

¹⁰ Adapted from Safeguarding Resource and Support Hub working definition

¹¹ <https://interagencystandingcommittee.org/iasc-champion-protection-sexual-exploitation-and-abuse-and-sexual-harassment/iasc-definition-principles-victimsurvivor-centered-approach>

¹² This includes, but is not limited to, work of NRC to implement its Minimum Standards on Safe and Inclusive Programming, which includes a dedicated Minimum Standard on Safeguarding.

13 Examples of abuse by type

Physical abuse includes hitting, shaking, kicking, pinching, pushing/pulling, grabbing, burning, female genital mutilation, torture.

Emotional abuse includes threats, intimidation or name-calling, isolation, degrading punishment.

Bullying includes a pattern of putting someone down, emotional, verbal or physical intimidation.

Harassment includes repeated hurtful joking and teasing, freezing out, deprivation of work tasks or unreasonable work demands. Repeated microaggressions which include indirect, subtle, or unintentional discrimination against members of a marginalized group such as racial or ethnic minority may amount to harassment.

Neglect includes the failure to comply with standard safety procedures causing actual or the risk of significant harm to project participants or NRC representatives.

Physical abuse of children includes corporal punishment/violent disciplining.

Emotional abuse of children includes not giving care to a child resulting in adverse effects on the behaviour, emotional state or development.

Neglect of children includes the failure to ensure adequate supervision, safety and/or meet basic needs of children under your responsibility, when having the means, knowledge and access to services.

Sexual exploitation & abuse of children includes all sexual activity of an adult with a child (even if legally married), fixing of child marriages, consuming, producing or distributing child abuse material.

Sexual abuse includes rape and attempted rape, unwanted sexual touching, indecent exposure, forcing other people to touch you.

Sexual exploitation includes asking a person in need of assistance to perform a sexual act in exchange for assistance, for a job or gifts; visiting sex workers, sharing intimate images or videos of an individual with others or threatening a person(s) with the same action.

Sexual harassment includes unwanted sexual looks or gestures, unwanted deliberate touching, leaning over or cornering, unwanted pressure for dates, and unwanted sexual teasing, sexting, sexual jokes, remarks or questions.

Examples child labour

¹⁴ See ILO Convention 182

https://www.ilo.org/ipec/Informationresources/WCMS_IPEC_PUB_30296/lang--en/index.htm

¹⁵ See ILO Convention 138

https://www.ilo.org/ipec/Informationresources/WCMS_IPEC_PUB_30215/lang--en/index.htm

¹⁶ Examples and clarifications safe engagement with children

Precautionary measures for unavoidable one-on-one interactions with children may include:

- remaining in visual sight of other people through an open door, remaining in open space,
- using the two-adult rule by inviting another colleague or, if available, a non-offending accompanying caregiver,
- in an emergency with an unaccompanied minor or if a child wants to speak without the accompanying caregiver, call a colleague to join as the 'second adult in the room'.

In a cultural and age-appropriate manner, children should be made aware of their rights and that NRC representatives, NEVER:

- hit, kick, pinch, grab or push to discipline a child. NRC prohibits corporal punishment in all its programmes,
- make a child feel scared or worried,
- touch a child's private body parts (an example may be areas covered by underwear),
- show an adult's private body parts to the child,
- ask a child to touch an adult's private body parts,
- ask a child to take off clothes/be naked, for example to take photos or videos with clothes off or
- show photos or videos of people without clothes (pornographic material) to children.

People who groom are often:

- well liked, fun to be with, and good at their job,
- create an environment that overcomes the child's resistance and prevents the child from telling someone about the abuse,
- use threats, appeals, and rewards, which make the child feel responsible for the adult's behaviour,
- attempt to isolate the child, talk to or meet the child in "secret" and/or asking the child to "keep secrets",
- It can take place in various settings, including online.

¹⁷ Examples safe communication

To reduce risk of harm in communications:

- Never geotag public-facing photos. Sharing identifying information such as an address, name, residency status or sexual orientation can unintentionally cause harm.

- Never share the identity of a person that has been sexually abused or exploited without their informed consent as indicated above.
- Show people clothed in a way that depicts dignity among local traditions.
- Never use images that are taken out of context.
- Never use images of exposed genitalia or individuals in a sexually suggestive pose.