



## WBR Child Protection Policy

Effective date:	01 September 2017
Revised date:	November 2020
Approved by:	Dave Neiswander, CEO

Child protection is of utmost importance to World Bicycle Relief (WBR), and we strive to ensure the safeguarding of every child who benefits in our programs ('Child' or 'Children' as appropriate). WBR implements programs in collaboration with national government ministries, through Implementation Partners (IPs), and by enabling community-based organizations called Bicycle Supervisory Committees (BSCs).

### The scope of this policy is as follows:

- Guidance: stipulates what will be done to protect Children in WBR programs.
- Documentation: stipulates what forms should be used and where they should be kept
- Response: informs what action should be taken if there is a Child Protection concern and/or incident

WBR has identified the **key persons** who may meet with or otherwise deal with the Children and this policy covers those groups ('WBR Team Members and Visitors'):

- WBR staff, contractors and volunteers
- Visitors to WBR programs
- WBR partners relevant government ministries
- WBR enabled community groups, or BSCs (Bicycle Supervisory Committees)

### 1. What is Child Protection at WBR?

"At World Bicycle Relief, Child Protection seeks to prevent, and responds to, exploitation, neglect, abuse, and other forms of violence affecting children. We seek to enable fulfillment of Children's rights to protection from all forms of abuse and violence within families, schools, institutions and communities that might arise from the implementation of WBR programs. Together with partners, we support prevention of exploitation, harmful traditional practices and violence against Children in their family and community."

### Definition of key terms

#### 1.1 WBR Guiding Principles and values

- 1.1.1 The organisation believes in shared responsibility of child protection amongst Team Members, and Visitors WBR will mainstream child protection in their programming and holds its Team Members and Visitors responsible for following WBR policies that guide the organization to take precautions necessary to protect all Children involved or those who participate in their programmes

## 2. WBR Child Protection Policy:

- a. **Overall ownership** of CP Policy development, roll-out and training, enforcement, reporting and accountability resides with WBR Human Resources under the direction of the Executive Director of Finance and Global Chief Executive Officer.
- b. **Development of Child Protection Policy:** All WBR Country Offices are responsible for ensuring the development of the WBR Child Protection Policy and periodic review of contextualized child protection policies during the annual Integrated Country Strategic Planning (I-CSP) process, and in accordance with local laws. Country Offices may set more strict requirements in their National Child Protection Policy, as required by national law or context. In cases where child protection policies from multiple offices apply, the most stringent policy is followed.
- i. Any changes to the standard WBR Child Protection Policy for country specific contextualization must be submitted to the CP Policy owner mentioned above.
- c. **Country Director and Preparedness**  
Country Directors (CDs) are responsible for implementing all aspects of the Child Protection Policy at their office and in country programs. CDs may delegate responsibilities, as appropriate, to members of their team, a Chief Operating Officer, or other responsible senior manager, but the CD holds final responsibility to ensure Children are safe when engaged with WBR Programs.
- i. The CD is responsible for identifying all emergency resources in their country for reporting suspected child protection violations. These emergency resources should be contacted immediately if a Child(ren) is at risk.
- d. **Program Design and Awareness Raising:** WBR equips all Team Members and Visitors to understand and perform their child protection responsibilities and obligations through the provision of a child protection agreement (see Addendum A).
- i. WBR staff responsible for designing and implementing programs, directly or indirectly through implementing partnerships, are responsible for protecting Children involved in those programs. WBR program and partnership development teams are responsible for integrating WBR's Child Protection Policy into all program and implementing partnership agreements.
- ii. All contracts with staff, contractors, and partners that involve contact with children as part of a WBR Program, include a copy of the WBR Child Protection Agreement, as well as the following assurances:

“In the course of contracted work, you agree that:

- All adults who have an interaction or access to Children will act in the best interest of Children, and abide by WBR's Child Protection Agreement (a

copy of which is attached to and forms part of our agreement) and other child protection measures as reasonably requested.

- If you become aware of any harm or risk to children, you will inform the person to whom you report at WBR immediately.”
- iii. All volunteers, or other people who may not have a formal contract with WBR but may interact with Children are required to sign the WBR Child Protection Agreement.
- iii Each BSC member and WBR-trained Field Mechanic will be required to sign the WBR Child Protection Agreement, and as proof of agreement, each BSC Local Policy will include the following language, and be signed by the BSC Chairperson, “Our BSC, located at \_\_\_\_\_ in \_\_\_\_\_ district, \_\_\_\_\_ (country), will adhere to the WBR Child Protection Agreement.
- iv. Copies of signed agreements should be kept on file by the relevant office.

**e. Orientation/Induction, Education and Training**

- i. WBR will reevaluate and update training material for staff, volunteers and contractors to ensure that the rights of children are safeguarded.
- ii. All new staff will receive orientation on child protection as part of their induction programme.
- iii. Existing staff will get refresher courses to ensure that they maintain skills on upgrading their knowledge on child protection
- iv. WBR will ensure that employees are equipped to watch out for and minimize risk of exploitation and abuse of children.

f. **Community awareness and escalation:** Each BSC will post the Child Protection Notice ( see Addendum B) in a public place in the school or designated location that gives the names and contact information of Government School Authorities and Police to contact if anyone in the community believes the Child Protection Agreement is not being applied by the BSC or others in the community in relation to a WBR program.

g. During community **orientation** and **sensitization** meetings, at which school Children are present, WBR staff and partners will highlight WBR’s commitment to child protection, the use of the WBR Child Protection Agreement, and inform community members of the Child Protection Notice and its posted location. A Child Protection Agreement can be handed out to interested parties.

**3. Contractors and Volunteers**

- a. WBR will require contractors (individuals and organisations), and implementing partners sign their adherence to the WBR Child Protection Agreement.
- b. WBR may require a contractor to remove personnel working on activities or in the event that WBR believes they have not taken steps to deal with any risk associated with child protection.
- c. All MOUs with implementing partners will require they will abide by WBR’s Child Protection Agreement.

#### 4. WBR Structure

- a. WBR's structure has been designed to ensure that there are open lines of communication to encourage reporting of any forms of child abuse
- b. WBR has clearly defined roles for all designated persons dealing with child protection issues.
- c. WBR incorporates child protection issues as part of its regular Incident Reporting in each country in which it operates. Reporting requirements are outlined in Section 8.

#### 5. Behavior Protocols

- a. Each National Child Protection Policy will include WBR Child Protection Behavior Protocols, which are rules of behavior to protect children based on local and culturally appropriate interactions with children. National Behavior Protocols comply with the following WBR International Behavior Protocols:
  - i. **Acceptable Behavior – WBR Team Members and Visitors:**
    - Are careful about perception and appearance in their language, actions and relationships with Children, and their behavior demonstrates a respect for Children and their rights
    - treat all children with respect regardless of race, colour, sex, language, religion, ethnic origin and any form of disability
    - ensure that all physical contact with Children is locally appropriate
    - use positive, non-violent methods to manage Children's behavior
    - accept responsibility for personal behavior and actions as a representative of the organisation
    - are accountable for their response to a Child's behaviour, even if a child behaves in a sexually inappropriate manner; adults avoid being placed in a compromising or vulnerable position with Children
    - where possible and practical, follow the 'two-adult' rule while conducting WBR work, wherein two or more adults supervise all activities that involve Children, and are visible and present at all times
    - comply with Child protection related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation
  - ii. **Unacceptable Behavior – WBR Team Members and Visitors within and outside their work environments do not:**
    - Link benefit from a WBR program with suggestions, offers, or actions of sexual relationship, financial gain, or other inappropriate or unlawful reward.
    - behave in an inappropriate physical manner, or develop a sexual relationship with a Child (under 18 years old), regardless of the country specific legal age of consent
    - fondle, hold, kiss, hug or touch Children in an inappropriate or culturally insensitive way
    - expose any Child to any form of pornography
    - use language, make suggestions or offer advice which is inappropriate or abusive, including language that causes shame or humiliation, or is belittling or degrading

- spend unnecessary time alone with a Child, away from others or behind closed doors or in a secluded area
- condone or participate in behavior with Children which is illegal, unsafe or abusive; including harmful traditional practices, spiritual or ritualistic abuse
- hire children in any form of child labor; in particular, WBR Team Members should not hire children as “house help” unless it is within the best interest of the child and in alignment with local law and international standards (Child labor is work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling. See ILO Convention 182 and 138 for further explanation of child labor.)
- hit or use other corporal punishment against a Child
- take a Child alone in a vehicle for WBR work, unless it is absolutely necessary, and with parental/guardian and managerial consent
- obtain any personal contact details of any Child, such as a mobile telephone number;
- seek to establish a personal 1-to-1 ongoing relationship of any kind with a Child;
- witness a colleague committing child abuse and not reporting the incident.

The above list is not exhaustive and will include any behaviour that is deemed / defined as child exploitation in line with country specific

- b. Corrective Action: Failure to comply with the WBR Child Protection Agreement , or other inappropriate behavior toward Children, is grounds for discipline, up to and including termination of the working relationship or dismissal from employment, volunteer/internship program or a request to leave an organized visit or meeting or Board/Advisory Council membership.

## 6. Screening and Recruitment

- a. Screening: WBR takes diligent measures to screen out all people who might seek to use WBR to harm Children. These measures include addressing child protection on application forms, in interviews and in references.
- b. Recruitment protocols for staff whose contracted responsibilities are expected to include interaction with or access to Children will include:
- i. Criminal background checks as appropriate in the country of recruitment.
  - ii. Reference checks from previous employers (minimum of 2 references who are not family)
  - iii. Including standardised interview questions on child protection
  - iv. Ensure that the recruitment panel is familiar with child protection issues
  - v. Details of job vacancies that involve contact with children will have reference to child protection as a core value for the organisation
  - vi. Employees will be required to sign a commitment to child protection
  - vii. At any time after recruitment, if the employee did not disclose any previous offences relating to child abuse/ exploitation, depending on the prevailing labour

laws, the organisation reserves the right to terminate the contract on the basis of non disclosure of a material fact.

7. **Mandatory Reporting of Violations:** it is required for all WBR Team Members and Visitors to report violations to the above behavior protocols. Failure to do so could result in disciplinary action, and in some cases dismissal. If a WBR Team Member suspects that the WBR Child Protection Behavior Protocols are not being followed, they must act in the best interest of the Child including contacting law enforcement to protect a child urgently and do one of the following:
  - a. File a Child Protection Incident Report that is sent to WBR Human Resources (HRemail@worldbicyclerelief.org)
  - b. Contact the WBR anonymous hotline: 1-855-FRAUD-HL or at [www.fraudhl.com](http://www.fraudhl.com) – Company ID: “WBRORG”
  - c. Inform the WBR Country Director, WBR VP/Africa or WBR CEO.
  - d. Record all steps taken to ensure child protection and safety

8. **Investigation of a suspected violation of the Child Protection Policy.**

The following instructions explain what must be done if a Child Protection Incident Report has been filed with WBR HR or if WBR is notified of a suspected violation through other communications channels, including the anonymous hotline or reporting to the WBR CEO, WBR Africa VP or WBR Country Director:

- a. The report will go to the WBR Human Resources Director. This person will share the report with the WBR CEO, WBR Africa VP, WBR Global Program Director, and the WBR Country Director where the incident occurred.
- b. The COO will form a CMT (Complaint Management Team) that includes the CD and other Senior Management with consent of the CD.
- c. The CMT reviews the complaint to determine if a violation of the WBR Child Protection Policy occurred or if more information is needed.
- d. The CMT assigns an internal field investigation team that will conduct an investigation and provide a confidential report to the CMT.
- e. The CMT will share it with the WBR CEO, WBR Africa VP, and WBR Global Program Director.
- f. The Country Director will undertake appropriate action after discussion with the WBR CEO, WBR Africa VP and WBR Global Programs Director.

9. **Enforcement**

Violation of the Child Protection Policy is grounds for discipline including dismissal from employment or termination of contract. An individual who is alleged to have violated the Child Protection Policy may be suspended from their position during an investigation of the allegation. A staff member who is proven to have engaged in Unacceptable Behavior will be dismissed from their employment with WBR and ineligible for rehire. Based on the evidence gathered during the investigation and subsequent determinations by the CMT, as well as consultation with WBR’s local legal counsel, WBR will decide whether it is necessary to notify local law enforcement of the violation.

In the event an allegation is proven to be untrue or fabricated, appropriate steps will be taken for follow-up with the person who has been accused, the Child, and the person who

made the accusation. Any staff member who makes false and malicious accusations will face disciplinary action, up to and including termination.

#### **10. Notification to local law enforcement as applicable if investigation yields credible evidence of Child abuse.**

1. In the event that the alleged abuse falls in the category of criminal in nature, the following steps will be taken:
  - a. The most senior WBR representative on site will take steps to ensure that the child affected and any legal guardian or community leader go to the nearest police station. The most senior WBR representative will ensure that the case is brought before the police within 24 hours from the time the case is reported and will immediately advise the Country Director.
  - b. Alternatively as part of awareness and reporting the community will be advised to take any abuse of a criminal nature to the police immediately and soon after contact the nearest WBR Field Officer.
  - c. Once a police report is obtained the WBR field Officer should forward the details including the incident report to the Country Director.
  - d. The Country Director will cause an Investigating committee/person to start investigation on the matter.
  - e. In deserving circumstances the employee may need to be suspended from work. If this is done, this should be in line with the relevant labour act of their specific country. WBR will ensure that the rights of both the complainants and the alleged perpetrator are not violated.

#### **11. Action where an employee is proven to be innocent including counselling**

- a. In the event that after an investigation an employee or consultant is formally cleared of the alleged charges, WBR HR will arrange for counselling to the affected employee/consultant in order for them to be fully integrated back into the system.

#### **12. Visitors**

- a. Visit Preparation: donor visits are pre-approved by both the fundraising office and the country field office.
- b. Visitor Orientation to Child Protection: Each WBR entity is diligent to ensure that visitors uphold the relevant behavior protocols. The following requirements apply to visitors who visit a project or have direct contact with children: they must sign the WBR Child Protection Agreement.
- c. Visitors who are not WBR staff or Board Members: All non-staff visitors are briefed on the National Child Protection Policy and must sign the WBR Child Protection Agreement before visiting WBR programs. Non- staff visitors are accompanied by a WBR staff person when visiting projects.

#### **2. Implementation Partners**

- a. All MOUs with Implementation Partners will include the following four clauses:

- i. "All Parties agree to have any staff, visitor, or donor to WBR Program sites sign the WBR Child Protection Agreement if their organization and/or program is receiving donated WBR bicycles.
- ii. Even if other organizations have their own Child Protection or Child Safeguarding Policy, they must still sign the WBR Child Protection Agreement as part of the MOU before receiving donated bicycles.
- iii. It would be acceptable for WBR to sign the Partner's Child Protection Policy or Agreement if this is appropriate for the good working relationship of both Parties."
- iv. "The WBR Child Protection Agreement will be appended to this MOU."

### 3. Communications, Social Media, and Digital Technology

- a. **Dignity:** In all forms of communication, WBR will ensure that Children are treated and portrayed with dignity and not as helpless victims or in sexually suggestive poses.
- b. **Consent:** Children who are primary subjects of text, photo and/or video resource gathering by WBR staff must provide informed consent. Informed consent means the subject has a general understanding of the purpose of the reporting or photography, and gives verbal or written permission. In the following situations, written consent is collected from the parent, guardian, or other legally required entity or individual, and the Child (as appropriate for age):
  - i. a Child could be personally identified or
  - ii. the sensitive nature of their personal disclosure or situation could possibly cause damage to their privacy, dignity, safety or reputation, or
  - iii. where otherwise required by applicable law.
- c. **Prevention of Harm in Communications:** WBR takes the following steps to prevent harm through communications, social media and digital technology (including photographs/videos/audio clips, stories, articles, or any other communication materials):
  - i. Material posted on social media or digital technology does not contain a child's family name or child's personal location/address.
  - ii. Material with a child or children is not geo-tagged to precise locations if it contains any part of the child's name. An acceptable alternative is to retag photos with the child's first name only to the school or project location.
  - iii. WBR provides reporting and response options so that sponsors, donors, visitors, children or their caregivers can report any incident(s) where either party feels uncomfortable or threatened.

**Contacts:** For more information on WBR's Child Protection Policy and Agreement, contact WBR's Executive Director of Finance, Jeff Bosken at [jbosken@worldbicyclerelief.org](mailto:jbosken@worldbicyclerelief.org)

Addendum A:

Child Protection Agreement

Addendum B:

Sample Child Protection Incident Response Notice

Addendum C:  
Photography Release for Minor Child or Children  
Addendum D:Child Protection Incident Report



## WBR Child Protection Agreement

World Bicycle Relief Child Protection seeks to prevent, and responds to, exploitation, neglect, abuse, and other forms of violence affecting children. We seek to enable fulfillment of Children's rights to protection from all forms of abuse and violence within families, schools, institutions and communities that might arise from the implementation of WBR programs. Together with partners, we support prevention of exploitation, harmful traditional practices and violence against Children in their family and community.

WBR Team Members and Visitors, defined as staff, contractors, donors, visitors, volunteers, partners, relevant government ministries, WBR enabled community groups and BSCs (Bicycle Supervisory Committees) **agree** to behave according to the following behavior protocols when engaging with the communities we serve:

- Be careful about perception and appearance in their language, actions and relationships with children, and their behaviour demonstrates a respect for children and their rights
- Ensure that all physical contact with children is locally appropriate
- Use positive, non-violent methods to manage children's behavior
- Accept responsibility for personal behaviour and actions as a representative of the organisation
- Are accountable for their response to a child's behaviour, even if a child behaves in a sexually inappropriate manner; adults avoid being placed in a compromising or vulnerable position with children
- Where possible and practical, follow the 'two-adult' rule while conducting WBR work, wherein two or more adults supervise all activities that involve children, and are visible and present at all times

WBR Team Members and Visitors within and outside their work environments **do not**:

- Link benefit from a WBR program with suggestions, offers, or actions of sexual relationship, financial gain, or other inappropriate or unlawful reward.
- Behave in an inappropriate physical manner, or develop a sexual relationship with a Child (under 18 years old), regardless of the country specific legal age of consent
- Fondle, hold, kiss, hug or touch children in an inappropriate or culturally insensitive way
- expose any Child to any form of pornography
- Use language, make suggestions or offer advice which is inappropriate or abusive, including language that causes shame or humiliation, or is belittling or degrading
- Spend unnecessary time alone with a child, away from others or behind closed doors or in a secluded area
- Condone or participate in behaviour with Children which is illegal, unsafe or abusive; including harmful traditional practices, spiritual or ritualistic abuse

- Hire children in any form of child labour; in particular, WBR Team Members and Visitors should not hire children as “house help” unless it is within the best interest of the child and in alignment with local law and international standards (Child labour is work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling. See ILO Convention 182 and 138 for further explanation of child labour.)
- Hit or use other corporal punishment against a Child
- Take a Child alone in a vehicle for WBR work, unless it is absolutely necessary, and with parental/guardian and managerial consent
- Obtain any personal contact details of any Child, such as a mobile telephone number;
- Seek to establish a personal 1-to-1 ongoing relationship of any kind with a Child.

Communications, Social Media, and Digital Technology

- **Dignity:** In all forms of communication, WBR will ensure that Children are treated and portrayed with dignity and not as helpless victims or in sexually suggestive poses.
- **Consent:** Children who are primary subjects of text, photo and/or video resource gathering by WBR staff must provide informed consent. Informed consent means the subject has a general understanding of the purpose of the reporting or photography, and gives verbal or written permission. If the subject is a child, written consent is collected from the parent, guardian, or other legally required entity or individual.
- **Prevention of Harm in Communications:** WBR takes the following steps to prevent harm through communications, social media and digital technology (including photographs/videos/audio clips, stories, articles, or any other communication materials):
  - Material posted on social medial or digital technology does not contain a child’s family name or child’s personal location/address.
  - Material with a child or children is not geo-tagged to precise locations if it contains any part of the child’s name. An acceptable alternative is to retag photos with the child’s first name only to the school or project location.
  - WBR provides reporting and response options so that donors, visitors, children or their caregivers can report any incident(s) where either party feels uncomfortable or threatened.

I agree with the above guidance to protect children associated with World Bicycle Relief programs:

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_



## WBR Child Protection Incident Response Notice

WBR Child Protection seeks to prevent, and responds to, exploitation, neglect, abuse, and other forms of violence affecting children. We seek to enable fulfillment of Children's rights to protection from all forms of abuse and violence within families, schools, institutions and communities that might arise from the implementation of WBR programs. Together with partners, we support prevention of exploitation, harmful traditional practices and violence against Children in their family and community.

If you are concerned that any WBR staff, partner, visitor, or volunteer is not behaving in a manner consistent with the above statement, please contact the following local officials:

Ministry of Education representative:

(name) \_\_\_\_\_

(mobile) \_\_\_\_\_

(location) \_\_\_\_\_

Ministry of Justice (Police) representative:

(name) \_\_\_\_\_

(mobile) \_\_\_\_\_

(location) \_\_\_\_\_

Ministry of Social Welfare representative:

(name) \_\_\_\_\_

(mobile) \_\_\_\_\_

(location) \_\_\_\_\_

Instructions: this Notice should be posted in a public place within a WBR Program Area

Addendum C



Photography Release for Minor Child or Children

I authorize World Bicycle Relief, (WBR) to publish photographs taken on \_\_\_\_\_(date) of myself and/or the minor child or children listed below (Photos), and our names for use in World Bicycle Relief's print, online and video-based marketing materials, as well as other WBR publications (WBR Documents).

I release WBR from any reasonable expectation of privacy or confidentiality for myself and for the minor child and children listed below associated with the Photos.

I confirm that I am the parent or legal guardian of the child or children listed below and that I have full authority to consent and authorize World Bicycle Relief to use the Photos and name.

I confirm that neither I, the minor child, or minor children will receive money or any kind of payment for the Photos or appearing in any WBR Documents.

I agree that publication of the Photos confers no rights of ownership or royalties whatsoever.

I release World Bicycle Relief, its contractors, its employees and any third parties involved in the creation or publication of the Photos or WBR Documents, from liability for any claims by me or any third party in connection with my participation or the participation of the minor children listed below.

**Authorization:**

Printed Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Address: \_\_\_\_\_

Relationship to Children: \_\_\_\_\_

**Names and Ages of Minor Children:**

Name: \_\_\_\_\_ Age: \_\_\_\_\_

Name: \_\_\_\_\_ Age: \_\_\_\_\_

Name: \_\_\_\_\_ Age: \_\_\_\_\_

## Child Protection Incident Report

Purpose: this form should be filled out by the person suspecting a violation of WBR's Child Protection Policy.

### About you:

- Name:
- Your role at WBR:
- Details of any other organization involved:
- Your relation to the child involved:

### About the Child:

- Name(s):
- Gender:
- Age(s):
- Address:
- Who does the child live with:

### About the Concern:

- How did you come to have a concern: was an Unacceptable Behavior observed or suspected?
- Was an allegation made? Did a child disclose an Unacceptable Behavior?
- Date, time and place of any incidents:
- Nature of concern or allegation:
- Observations made by you (ie, child's emotional state, any physical evidence):
- Write down exactly what the child said, and what you said:
- Any other relevant information (ie, disability, language):
- Were other children involved?
- Have you reported this to parents or caregivers or any other child protection person?:
- Time and date of reporting:
- Persons to whom this report was made:
- Advice given:
- Action taken: