

WORLD VISION MALAYSIA (WVM) POLICY		DOCUMENT NUMBER:	
APPROVED BY: WVM Board of Trustees (2022)	RESPONSIBILITY: P&C and CPO	FY220001	
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CHILD AND ADULT SAFEGUARDING POLICY			

PREAMBLE

The WVM Policy on Child and Adult Safeguarding, also referred to as the WVM Safeguarding Policy, outlines the commitment and responsibilities of **World Vision Malaysia (WVM)** in upholding standards consistent with the **Partnership Management Policy on Child and Adult Safeguarding 2021** and in accordance with local laws¹.

1. OVERVIEW

1.1 PURPOSE

- 1.1.1.** Safeguarding children and adults living in communities we serve is foundational to all WV activities, programmes, and Lines of Ministry (relief, development, and advocacy). Central to everything we do is our commitment to do no harm to any child anywhere nor to adults living where World Vision has a programming presence. We uphold the best interests² of children as a primary consideration in all actions and decisions.
- 1.1.2.** Safeguarding includes preventing, reporting, and responding to harm or abuse caused by WV employees and affiliates of children and of adults living where WV has programming presence.
- 1.1.3.** WV is committed to continuous improvement of safeguarding efforts which emphasises prevention of sexual exploitation and abuse (PSEA) and other forms of violence or harm. We abhor any misuse of power, status, or trusted position for any sexual or other exploitative purposes. We endeavour to tackle this root cause of abuse in our prevention and training efforts.
- 1.1.4.** WV has zero tolerance towards incidents of violence or abuse against children or adults, including sexual exploitation or abuse, committed either by employees or others affiliated with our work. WV takes necessary actions to respond to any suspected or known instances of abuse. Incident responses are centred on the child or adult survivor, prioritising their interests.
- 1.1.5.** This Policy continues to emphasise the unique vulnerabilities and special protection requirements for children, along with the importance of preventing sexual exploitation and abuse (SEA), in particular, among other forms of abuse of adults living where WV has a programming presence.

¹ Local laws include but not limited to the Child Act 2001, Sexual Offences against Children Act 2017, and laws relating to employment of children and young persons as seen in Section 2.

² Convention on the Rights of the Child, General Comment 14: http://www2.ohchr.org/English/bodies/crc/docs/GC/CRC_C_GC_14_ENG.pdf

1.2 SCOPE

- 1.2.1. The WVM Safeguarding Policy applies to World Vision Malaysia Berhad (WVMB), hereinafter referred to as 'WVM'. It is based on the Partnership Management Policy on Child and Adult Safeguarding which applies to all World Vision entities, including but not limited to Field Offices, Support Offices, VisionFund International (VFI) and all of its affiliated microfinance institutions (MFIs), and World Vision International and its Global Centre, regional, programme, branch, and project offices, (hereinafter 'WV entities') as well as Boards and Advisory Councils. References to "WV" shall be understood as including all of these entities, unless the specific language or context clearly indicates otherwise.
- 1.2.2. This Policy is focussed on protecting all children anywhere from harm caused by WVM employees and affiliates and protecting adults from harm caused by WVM employees or affiliates as part of WV programme presence.
- 1.2.3. This Policy applies equally in emergency relief and development aid programmes, as well as advocacy and fundraising activities.
- 1.2.4. Further explanation of the WVM Safeguarding Policy is included in the document Guidelines for Implementation of the World Vision Child and Adult Safeguarding Standards.

1.3 EFFECTIVE DATE

This Policy shall take effect from 26 March 2022.

1.4 RETIRED/RELATED POLICIES

- 1.4.1. The WVM Safeguarding Policy expands upon WV's Child Protection Standards, in place since the year 2000, to cover communities with whom World Vision works, especially women and children, in one integrated policy. The initial WVM Safeguarding Policy which was approved in November 2019, is retired and replaced by the WVM Safeguarding Policy (2021).

1.5 CONTEXTUALIZATION

- 1.5.1. WVM is responsible for ensuring the development, implementation and periodic review of contextualised safeguarding policies, which are to be consistent with the standards outlined in the Partnership Management Policy on Child and Adult Safeguarding and in accordance with local laws.
- 1.5.2. WVM may set stricter requirements in the WVM Safeguarding Policy, as required by national law or context. In cases where safeguarding policies from multiple offices apply, the most stringent policy is followed.
- 1.5.3. WV offices and MFIs operating in the same country shall coordinate in any national contextualisation.

2. POLICY

2.1. SAFEGUARDING POLICIES AND RESPONSIBILITIES

- 2.1.1. Development of Contextualised Safeguarding Policies: WVM must contextualise the Partnership Management Policy on Child and Adult Safeguarding and update it on the regular schedule of policy review, per section 1.5 above.

2.1.2. Relevant WVM Employees, Interns, Volunteers, Board/Advisory Councils and other affiliated people: WVM equips all employees, interns, volunteers and Board/Advisory Councils to understand and perform their safeguarding responsibilities and obligations. WVM also applies appropriate standards to external parties, including visitors, community volunteers, contractors, partners, and others affiliated with partners or contractors, to address safeguarding risks relating to their engagement with WVM's work. Hereafter, the full range of people for whom all or some of this Policy are relevant (either directly or through contractual agreements) will be referred to as 'WVM employees and/or affiliates'.

2.1.3. Signed Acknowledgement: All WVM employees, volunteers, interns, and Board/Advisory Council members sign an acknowledgement that they know, understand and will follow the WVM Safeguarding Policy. Signed agreements are kept on file by the relevant WVM departments. Individual employees or subcontractors of Contractors and Partners as defined below also acknowledge safeguarding policies, and these signatures are held by the Contractor or Partner.

2.1.4. Agreements with Contractors: Contractors engaged in contracts where they – or their employees or subcontractors – may have access to children or adults in WV programmes, or may have access to identifiable personal data about such children or adults, require the safeguarding language below (or language substantively the same) in their contract with WVM. In addition, a copy of the Safeguarding Behaviour Protocols must be attached to the contract. These requirements apply whether the Contractor is being paid for the services or is providing them for free ('pro bono'), and is irrespective of the duration of the contract.

'In the course of performing this contract, Contractor and Contractor's employees will ensure that:

1. Any of their interactions with adults living where WV has a programming presence, with children, or with identifiable personal data about such persons, will comply with the attached WVM Safeguarding Behaviour Protocols, and with any other reasonable safeguarding measures that WVM may specify;
2. Any incidents of harm or risk of harm to any child or to adults living where WV has a programming presence will be reported immediately to WVM;
3. Any individuals with access to adult programme participants, to children, or to identifiable personal data about such persons, will have a current clean criminal background check or WVM approved alternative screening measures³ for offenses against children or abuse of adults, to the extent permitted by law (evidence of which will be provided to WVM upon request);
4. They do not use children for labour⁴; and
5. These safeguarding obligations will be clearly communicated to, and acknowledged by, all employees who may have access to children or to adults living where WV has a programming presence, or to identifiable personal data about such persons, and will be extended in identical form to any subcontractors (if any are authorised) engaged to perform this contract.'

2.1.5. Agreements with Partner Organisations: When engaging a partner for a domestic programme or programme activity, WVM must assess the capability of the Partner to fulfil safeguarding responsibilities, including the Partner's safeguarding policy, procedures, and implementation.

³ Alternative screening measures shall be in accordance to the formal Global Centre approved alternative procedures to police background checks granted to WVM. See GC exemption letter in the Appendices section for more information.

⁴ Child labour' is work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling. 'Child work' in contrast may be beneficial if permitted by International Labour Organisation [ILO] Conventions and puts the child's interests ahead of any benefits gained by adults.

World Vision must then either (a) approve or (b) develop a capacity building plan and support the Partner to develop stronger safeguarding controls.

- a. The agreement (whether referred to as an 'agreement', 'subgrant', 'Memorandum Of Understanding', or any other term), must specify that before the Partner begins any work on the project, WVM will conduct the assessment and approve or support the Partner as appropriate.
- b. The Partner can agree to follow this Policy in carrying out the programme activities.
- c. The agreement must ensure that any of the Partner's personnel working in the project will have a current clean criminal background check or WVM approved alternative screening measures⁵ for offences against children or abuse of adults, to the extent permitted by law (evidence of which will be provided to WVM upon request).

2.1.6. Training: All WVM employees, volunteers, interns, and Board/Advisory Council members, as well as partner employees or partner volunteers working within a WVM project, receive safeguarding training within 90 days from the start of employment or WVM affiliation.

- a. WVM employees and volunteers receive periodic refresher or other safeguarding training at least once every two years thereafter. Board/Advisory Council members receive refresher training on re-election (see section 2.10).

2.1.7. Safeguarding Staffing: WVM appoints the P&C Manager and Child Protection Officer (CPO) as the Safeguarding Leads/Focal Points, to provide leadership to the implementation of this Policy.

- a. Humanitarian/Emergency responses which are declared a Category 3 response appoint their own Safeguarding Focal Point.
- b. The Safeguarding Leads/Focal Points have a mandate for direct access to the CEO/Senior Director, and to the WVI Safeguarding Director, should he/she feel that safeguarding issues are not being addressed adequately.

2.2. BEHAVIOUR PROTOCOLS

2.1.1. Safeguarding Behaviour Protocols: WV employees and affiliates behave in ways that safeguard children everywhere and adults living where WV has a programming presence, prevent sexual exploitation and abuse, and prevent any other intentional or unintentional harm to the people WV serves and works amongst.

2.2.2. Rules of behaviour are based on local and culturally appropriate interactions (provided these meet or exceed the minimum protocols below) with children, members of the opposite sex, and other adults living in the programming area, and are included in each contextualised Safeguarding Policy.

Acceptable Behaviour – WVM employees and affiliates:

- a. create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of these Behaviour Protocols;
- b. are careful about perception and appearance in their language, actions and relationships with children and with adults living where WV has a programming presence. Their behaviour – including in person and on digital platforms, both online and offline – demonstrates a respect for children and adults and their rights;
- c. ensure that all physical and online contact with children and programme participants is appropriate in the local culture;
- d. use positive, non-violent methods to manage children's behaviour;
- e. accept responsibility for personal behaviour and actions as a representative of the organisation;
- f. are always 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;

⁵ Ibid, 3.

- g. where possible and practical, follow the 'two-adult' rule while conducting WV work, wherein two or more adults supervise all activities that involve children, and are visible and present at all times;
- h. comply with safeguarding-related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation;
- i. comply with applicable data privacy laws and with relevant WV data privacy and information security policies, including WV digital child safeguarding protocols, when handling any personal data about individual children or adult programme participants, and that such data must be maintained and transferred in a secure, confidential manner;
- j. immediately report through established reporting mechanisms any known or suspected safeguarding incident or breach of this Policy by a WV employee or affiliate, or a humanitarian aid worker⁶ from any other agency (see *Section 2.6.5* on how to report).

Unacceptable Behaviour – WVM employees and affiliates **do not:**

- a. 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 or age of majority. This includes consenting or condoning the above behaviour (including fostering or condoning child marriage, i.e. under 18 years old); This also includes behaviour that could be seen as grooming a child for a future inappropriate relationship;
- b. develop or seek a sexual relationship with any adults living where WV has a programming presence. Such relationships, based on inherently unequal power dynamics, undermine the credibility and integrity of WV's humanitarian aid or development work;
- c. sexually exploit or abuse any adult living where World Vision has a programming presence or any child;
- d. exchange money, employment, goods, or services for sex (including sexual favours, other forms of humiliating, degrading, or exploitative behaviour, or hiring sex workers) or other exploitative demands. This includes exchange of assistance that is already due to programme participants;
- e. communicate with a child in WV's programme areas via digital platforms (e.g. Facebook, Twitter), via mobile technology (e.g. texting, WhatsApp, Skype), or online without consent and knowledge of his/her parents. Further, WV employees or affiliates never communicate on mobile, digital or online platforms with children or adult programme participants in ways that are inappropriate or sexual;
- f. fondle, hold, kiss, hug or touch any child, or any adult living where WV has a programming presence in an inappropriate or culturally insensitive way;
- g. use inappropriate or abusive language with a child or adult where WV has a programming presence, for example language that causes shame or humiliation, or is belittling or degrading;
- h. spend excessive or unnecessary time alone with a child or adult programme participant, away from others or behind closed doors or in a secluded area;
- i. condone or participate in behaviour which is illegal, unsafe or abusive; including harmful traditional practices, spiritual or ritualistic abuse;
- j. hire children in any form of child labour (including 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. 'Child work' in contrast may be beneficial if permitted by International Labour Organisation [ILO] Conventions and puts the child's interests ahead of any benefits gained by adults⁷);
- k. hit or use other corporal punishment against a child while the child is in WV care or the WVM employee or affiliate is conducting WV work;
- l. take a child alone in a vehicle for WV work, unless it is absolutely necessary, and with parental/guardian and managerial consent;
- m. misuse or be careless with personal data about individual children or adult programme participants;
- n. stay silent, cover up, or enable any known or suspected safeguarding incident or breach of Safeguarding Policy by a WV employee or affiliate;
- o. exchange inclusion in WV programmes or benefits for any kind of favour from a member of the community, as this is an abuse of power.

⁶ "Humanitarian aid worker" includes all paid employees, volunteers, contractors, and other affiliates of organisations providing emergency relief or development aid. Such organisations include UN agencies, INGOs, LNGOs, and CBOs.

⁷ See ILO Conventions 182 and 138, as well as the Children and Young Persons (Employment) Act 1966, Sarawak Labour Ordinance 1952, and Sabah Labour Ordinance 1950 for what constitutes child labour or permitted child employment.

The above list provides concrete examples but is not exhaustive of all behaviours that constitute a violation of this Policy.

2.2.3. Disciplinary Action: The following are grounds for discipline, up to and including termination of the employment or other affiliation with WVM:

- a. Failure to follow WVM Safeguarding Behaviour Protocols;
- b. Failure to follow any other part of the WVM Safeguarding Policy;
- c. Other inappropriate behaviour toward children or adults living where WV has a programming presence;
- d. Failing to report a known or suspected safeguarding incident committed by a WV employee or affiliate; or
- e. Interference with any investigation or unauthorized inquiry into a possible policy violation.

Individuals who have been found to have breached this Policy may have “Do Not Rehire” placed on their personnel file. Partners and Contractors may have “Do Not Re-engage” placed on their file based on the nature of the case.

2.3 RECRUITMENT⁸

2.3.1. Screening: WVM takes diligent measures to screen out all people who might seek to use WVM to harm children or adult programme participants, or whose past actions indicate an unacceptable risk of such harm.

- a. These measures include but are not limited to addressing safeguarding in job advertisements (when feasible), applications, interviews and references. Safeguarding screening measures are applied to all candidates for employment, Board/Advisory Council members, volunteers, interns, and individual contractors who will have access to children or adult programme participants or to their identifiable personal data.
- b. During the interview process, applicants are asked about previous work with children.
- c. For references supplied by applicants, questions are asked regarding the suitability of the candidate to work with vulnerable adults and children or for a child-focused agency. Documentation of references is kept on file.
- d. Screening of internal candidates includes reference checks and review of their personnel file for any previous infractions while working with WV.

Note that major grant donors may have specific screening requirements for work they fund, so relevant grant terms and regulations should be checked.

2.3.2. Identity and Criminal Background Checks: Candidates for employment, Board/Advisory Council members, volunteers, and interns – as well as relevant personnel of contractors and partners – have an identification check and an appropriate criminal record/police background check (or approved alternative procedures to police background check), to the extent permitted by law, prior to employment or engagement with WVM, and periodically thereafter as required by law or appropriate for the context. Formal Global Centre exemption approval is granted for alternatives to police background checks in contexts where they are not feasible or trustworthy or lawful. Exemption approvals are valid for 5 years. After which, a new request must be submitted if review of context reveals that police background checks are still not feasible or trustworthy or lawful. People with prior conviction for any crime against children or sexual exploitation or abuse against an adult are not hired or engaged by WVM, to the extent permitted by applicable law, and in any case will not be placed in a position with access to children or adult programme participants, or to their personal data.

⁸ Please see WVM Safeguarding Screening Policy in Appendices section for more information.

2.4. VISITS TO WV PROJECTS

- 2.4.1. Visitors:** Visitors subject to this Policy include people going to a WV field programme or meeting children at a WV-facilitated event.
- “Visitors” include sponsors, donors, other delegations such as celebrity supporters or journalists invited by WVM.
 - Government officials or institutional donors (government, multilateral) based in the hosting country do NOT require Safeguarding clearance, but are accompanied by a WV employee(s).
 - Unannounced visits to sponsored children or WV project communities are not permitted.
- 2.4.2. Visit Preparation:** Visits by all sponsors and private donors, and other international visitors are pre-approved by both the sending and the hosting office. The office sending the visitor conducts police background checks or Global Centre approved alternative procedures to police background checks on potential sponsor or donor visitors prior to any field visit, where permitted by law.
- 2.4.3. Visitor Orientation to Safeguarding:** WVM is diligent to ensure that visitors uphold the relevant sections of this Policy. The following requirements apply to visitors who visit a project or have direct contact with community members in WV programming areas.
- Visitors from other WV offices who are employees or Board Members: The hosting office provides a brief orientation to any distinctive Safeguarding Behaviour Protocols that apply in that context, as well as local customs regarding adult interaction with children. Employees and Board members do not need to re-sign the policy or behaviour protocols.
 - Visitors who are not WV employees or Board Members: All such visitors are briefed on WV’s Safeguarding Behaviour Protocols (*Section 2.1.1*) and Prevention of Harm in Communications (*Section 2.5.3*) by the sending office prior to the visit. Upon arrival, visitors receive a brief written or oral orientation and sign acknowledgement of receipt of the protocols. The signed acknowledgement is kept on file by the hosting entity. Non-employee and Board visitors are accompanied by a WV employee when visiting projects.

2.5. COMMUNICATIONS, CONTENT AND MARKETING

- 2.5.1. Dignity:** WVM takes care to ensure cultural sensitivity and restrictions for reproducing personal images are adhered to before photographing or filming a subject, and WVM ensures images are honest representations of the context and the facts. In all forms of communication, children and adults are treated and portrayed with dignity and not as helpless victims or in sexually suggestive poses.
- 2.5.2. Consent:** Children and adults who are primary subjects of text, photo, video, audio and/or data gathered on behalf of WVM must provide informed consent, and have the right to withdraw their consent at any time for any reason. WVM must be able to demonstrate that informed consent has been given, and have systems in place that will allow WVM to show that a request to withdraw consent has been respected.

Informed consent means the subject has a general understanding of the purpose of the content, and gives verbal or written permission thereof. If the primary subject is a child, informed consent is also collected from the parent, guardian, or other legally required entity or individual.

In the following situations, verbal consent is not acceptable and written consent is collected from the adult participant or the child’s legal guardian:

- the sensitive nature of their personal disclosure or situation could possibly cause damage to their privacy, dignity, safety or reputation, or
- where otherwise required by applicable law

2.5.3. Prevention of Harm in Communications: WVM is committed to storytelling that raises awareness of and promotes solutions to ending violence and abuse against children and adults. WVM takes the following steps to prevent harm through communications, content gathering and marketing (including digital or offline photographs/videos/audio clips, stories, articles, or any other communication materials):

- a. Personal information on children and adults that is captured, stored or sent through electronic, on-line or mobile devices is password protected. In addition, data is handled in accordance with WV's current information security standards for personal data, which may include encryption and other requirements.
- b. WVM ensures that relevant requirements for safeguarding are clearly communicated to all staff, sponsors, vendors and partners at the point of access to photographs, videos or data, and that appropriate measures are taken for child-safe usage of the content once it has been shared.
- c. Recognising the special vulnerability of children, material posted on social media or digital channels mentions only the child's first name and country name, and does not contain a child's family name, sponsorship ID number, or child's personal location/address. In cases of sensitive subjects such as unaccompanied children or child sex workers among others, WV conceals the child's identity in images and uses a pseudonym.
- d. 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 Area Programme or project office location.
- e. WVM discourages direct, unfacilitated, undocumented communication through social media without WVM's knowledge between: a sponsor/donor/visitor and registered/non-registered children and between employees/volunteers/other WVM affiliates and registered/non-registered children.
- f. Where WVM facilitates communication between children and external parties, controls are put in place to protect children's safety and well-being.
- g. WVM 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. Sponsorship welcome kits, WVM websites, domains and social media platform profile pages contain reporting options for child protection concerns or safeguarding incidents.
- h. Use of platforms to share marketing or communications content with no ability to track back evidence of informed consent and/or platforms that lack the ability to withdraw consent is forbidden. Only platforms that have been vetted by global or local WV IT are permitted for sharing content between offices or with donors/external parties. (e.g. Horizon, RMT, StoryHub, etc.)

2.6. SAFEGUARDING INCIDENTS AND RESPONSE PROTOCOLS

2.6.1. Responding to Safeguarding Incidents: WV Entities are required to investigate and respond to reports of violations of this Policy and harm of children or adult programme participants in ways which are consistent with local law. WV uses three levels of Safeguarding Incidents to determine WV's response, which is based on the seriousness of the incident and WV's role. Offices with community-based programmes develop a Safeguarding Incident Preparedness Plan (SIPP) which defines response in line with local law and available services.

2.6.2. Level 1 Child Protection Community Incidents: Abuse of or harm to a child, in a community where WVM has domestic programme operations and that *is not* committed by WVM employees or affiliates, is a Level 1 Incident. Field offices track and document Level 1 Incidents and respond according to their SIPP in cases of serious harm that threaten the child victim's survival, safety or development.

2.6.3. Level 2 Safeguarding Incidents: Level 2 Incidents are defined as any violation of this Policy which puts any child anywhere or adults living where WV has a programming presence in direct risk of potential harm, but where no actual harm is believed to have occurred. WVM reports Level 2 Incidents to WVI Safeguarding within 24 hours of first notice. Response is implemented by WVM with oversight by and accountability to the WVI Safeguarding Unit and support from the Regional Safeguarding focal point.

2.6.4. Level 3 Safeguarding Incidents: A Level 3 Incident is an allegation or accusation of harm or abuse to any child anywhere or adults living where WV has a programming presence by a WV employee or affiliate. If a child is involved, two additional types of incidents qualify: death or serious injury of a child while participating in or at a WV activity or caused directly by a WV-related person, and/or a road traffic accident involving a WV vehicle or driver affiliated with WV in which a child is injured or killed. WVM reports actual or alleged Level 3 Incidents to WVI Safeguarding within 24 hours of first notice. Response is implemented by WVM with oversight by and accountability to the WVI Safeguarding Unit and support from the Regional Safeguarding focal point.

Where mandated by applicable law, grant requirements, or agreements with WVI, relevant Support Offices are informed immediately in coordination with WVI Legal. See section 2.6.6 Notification of Safeguarding Incidents.

2.6.5. Reporting incidents: All WVM employees and affiliates are responsible and obligated to report any suspicions of Level 2 or Level 3 incidents as soon as it is discovered. As stated in section 2.2.3(d), failure to report by one of the mechanisms below is a breach on this Policy and is grounds for disciplinary action up to and including termination of employment.

In addition, any credible concern or suspicion of sexual abuse or exploitation by a humanitarian worker outside WV is immediately reported. Where interagency mechanisms are established, these are utilised to report the incident, in consultation with the WVM Safeguarding Leads/Focal Points.

Reports can be made by WVM employees or affiliates in the following ways:

- a. Report to line manager or P&C manager
- b. Contact WVM Safeguarding Focal Point (who then reports on IIM system)
- c. Contact Regional Safeguarding focal point (who then reports on IIM system)
- d. Contact WVI Safeguarding Unit by email at safeguarding@wvi.org
- e. Staff can use Incident Reporting form in WV's Integrated Incident Management (IIM) system www.worldvisionincidentreport.ethicspoint.com
- f. If the above options are not available or appropriate for whatever reason: Use WV Integrity and Protection Hotline (also known as Whistleblower Hotline): [Phone numbers and online reporting options available at http://worldvision.ethicspoint.com](http://www.worldvision.ethicspoint.com).

2.6.6. Notification of Safeguarding Incidents: The WVI Safeguarding Unit informs Support Offices and Multilateral donors of safeguarding incidents according to contractual obligations and regulatory requirements. Additionally, Support Offices may be notified if an incident has potential reputational issues.

- a. The WVI Safeguarding Unit can provide a copy to the field office for the purpose of notifying local donor offices if appropriate.
- b. In line with the principle of 'need-to-know', no identifying information on survivors, witnesses or subjects of complaint are shared in these notifications.
- c. Only basic information is provided in order to a) ensure the privacy and safety of those involved in the incident and b) provide assurances that World Vision is appropriately managing the case.
- d. Support Offices notify their national donors according to contractual/regulatory requirements using the information provided by the WVI Safeguarding Unit's notification.

2.6.7. Disclosures: Whilst WVM maintains appropriate confidentiality for individuals in Safeguarding Incidents, WVM may disclose information or data about incidents, when lawfully permitted, in order

to support prosecution of suspected criminal activity, meet donor and regulatory requirements, support learning and accountability, enable appropriate due diligence, advocate to prevent future incidents, or as required by law.

- a. Information in ongoing investigations of Safeguarding Incidents, and information about past incidents, is shared only with those on a 'need-to-know' basis, as deemed necessary by WVM or regional office or WVI Safeguarding Unit. If it is likely that sensitive information about survivors or about violence against children or adults will not be kept confidential, and would put people at risk if accessed by unauthorised parties, such information is not collected.
- b. Detailed personal information, in particular health information, is not obtained or maintained by WVM in safeguarding incident management, except for the minimum necessary to ensure WVM handles the matter appropriately. Such personal data is kept strictly confidential and protected in accordance with the applicable data protection and information security standards.

2.6.8. Reporting to Authorities: WVM evaluates reporting safeguarding violations to appropriate legal authorities, assessing any legal obligations to report, as well as the interests of the survivor(s). WVM reports when legally authorised to do so, unless a report is judged likely to cause greater harm to existing victims or potential future victims.

2.6.9. No Retaliation for Reporting: WVM does not tolerate any harassment, retaliation or adverse action whatsoever by any employee, director, contractor or other affiliate as a result of any safeguarding report provided in good faith to World Vision, law enforcement or other recognised reporting mechanism.

- a. No employee shall be adversely affected because they refuse to carry out a directive that could reasonably be construed as likely to create abuse or neglect of a child or an adult programme participant.
- b. If an employee believes that they are being retaliated against, the employee should immediately contact People and Culture or report it through the Whistleblower hotline. Anyone who retaliates against an employee for making a good faith report will be subject to disciplinary action up to and including termination. WVM's commitment to anti-retaliation does not prevent a reporter from appropriate disciplinary action if they are found to have engaged in unethical behaviour or misconduct.

2.6.10. Safeguarding Investigations: Safeguarding investigations meet minimum standards and follow the core principles of investigating allegations of harm, exploitation or abuse to child &/or adult living where World Vision has a programming presence: thoroughness, confidentiality, safety, competent investigators, impartiality, objectivity, timeliness, accuracy and documentation.

- a. Investigations follow a survivor-centred approach and investigators conduct the process in accordance to sector best practice to prevent further harm to the survivor. World Vision prioritises the safety, physical and psychological health and welfare of all survivors while upholding and promoting their rights of confidentiality, equality and access to justice.
- b. World Vision may deploy internally trained investigators or retain the services of an external investigator to manage an incident. Oversight of investigations takes place according to the protocols of the incident level.

2.7. PROGRAMMING CONSIDERATIONS FOR SAFEGUARDING

2.7.1. Safeguarding Essentials in Programming: In all programmes (including development, humanitarian response and advocacy), WVM seeks to do no harm to children or adult programme participants, to keep the interests of community members – especially children – at the centre of our activities, and to utilise opportunities to help children be safer within their families and communities. This includes consideration of local protection threats and issues during the entire program life cycle, and influencing local actors and groups to be safer organisations for children and adult programme participants.

- 2.7.2. Community Feedback and Complaints Mechanisms and Information Provision:** Children, parents, and other adults are aware of established complaints mechanisms in WVM domestic projects and their right to be safe from abuse and exploitation in WVM domestic programmes. As part of our wider Programme Accountability Framework, every WVM domestic programme:
- ensures that there are community feedback and complaints mechanisms through which community members can report both general suggestions and any serious incidents of misconduct by WVM employees and affiliates. These mechanisms should be safe and contextually appropriate (i.e. designed in consultation with the community and so child-friendly, gender sensitive and inclusive of those with low levels of literacy).
 - provides information to communities on what behaviour they can expect of WVM employees or affiliates and how to report any concerns about abuse, exploitation, or any other breaches of Behaviour Protocols by WVM employees or affiliates.
- 2.7.3. Online safety in programme activities:** WVM actively supports child programme participants and their parents/caregivers—as well as any children participating in WVM-organised digital activities—to understand how to safely and appropriately utilise social media and digital technology, while avoiding risks and appropriately responding to threats or incidents.
- 2.7.4. Institutionalisation and Adoption:** As a Christian organisation, WV values the family as the primary social unit and basis of civil society. Children grow and thrive best in a family-based environment, not in institutional care.
- WV therefore does not support programming within long-term institutions in ways that perpetuate the institutionalisation of children. WV supports community-based care options for children which allow the child to remain with family members. If remaining with the family is not in the best interests of the child, WV supports the family, community and local authorities to find community-based solutions. WV does not facilitate the adoption of children.
 - Short-term or interim care is sometimes needed for girls and boys to ensure their protection whilst longer-term community care is arranged. For example, short-term care may be appropriate for girls and boys who have been seriously abused or trafficked, have been associated with fighting forces, in conflict with the law, or living on the streets. WV only supports interim care facilities that are family-like in their design. An interim care facility is not always needed: safe community care options are preferred if they are available.
 - WV responds to risks and situations of children deprived of parental care by strengthening families to care for children, reducing risk of separation from their immediate and extended family, strengthening systems that provide alternative community-based options to institutionalisation, and supporting transition and deinstitutionalisation processes.
- 2.7.5. Humanitarian Responses:** Because of the special vulnerability of children and adults during humanitarian responses, safeguarding measures take on additional importance. Category 3 Responses must meet the standards outlined in this Policy in addition to other industry standards.
- Humanitarian protection and child protection are anticipated and planned for in programme designs, ensuring that WV does not expose programme participants to greater harm through participation.
 - All Category 3 Responses must complete a safeguarding self-assessment.
 - All Category 3 Responses must have an assigned Safeguarding Focal Point who has direct access to response management and who has responsibilities as expressed in section 2.1.7 of this Policy.
 - Some aspects of this Policy may be addressed through accepted industry mechanisms, such as the cluster system or PSEA network.

2.8. SPONSORSHIP

- 2.8.1. Prevention of Harm in Sponsorship:** Because of the close relationship built between WV employees and affiliates, especially volunteers, with registered children and their families, unique safeguarding

considerations must be put in place to reduce risk of abuse and exploitation. The Child Sponsorship Standards outline this behaviour. Sponsorship is implemented in a manner that keeps the safety of children as the top priority. This includes:

- a. The facilitation and review of all sponsor correspondence and all other types of connection, such as videos, between the sponsor and child to ensure appropriate interaction and safety of all parties
- b. Training of staff and child monitors (where applicable) to recognise and respond to abuse, including linking child monitors to the local Child Protection Committee and/or Child Protection Reporting and Referral Mechanism
- c. Constructive and respectful interaction with parents and children
- d. The secure handling and storage of personal information
- e. Gathering only the minimum elements of personal information necessary for the programme.

As stated in 2.7.3 above, WVM actively supports child programme participants and their parents/caregivers—as well as any children participating in WV-organised digital activities—to understand how to safely and appropriately utilise social media and digital technology, while avoiding risks and appropriately responding to threats or incidents.

2.8.2. Child Protection Minimum Standards: All Area Programmes with child sponsorship ensure the following minimum package of Child Protection Minimum Requirements (interventions) are included in their programming:

- a. Conducting a child protection context analysis to understand and address the community child protection issues and their root causes
- b. Supporting or strengthening community-based reporting and referral mechanisms that enable boys and girls, caregivers, and other community members to report child protection violations with confidence and receive help in addressing them
- c. All adolescent RCs (aged 12 to 18) are directly participating in interventions that strengthen their well-being. Interventions that strengthen life skills and protective skills are prioritised and used to the extent that it is feasible

2.8.3. Responding to Abuse: Field staff promote appropriate follow-up action or referrals if child safeguarding needs are observed or reported, as stipulated in the national Safeguarding Incident Preparedness Plans and consistent with local law.

2.9. SAFE CHILD PARTICIPATION

2.9.1. Prevention of Harm in Child Participation: WVM works to empower children as citizens and participants in their own well-being, and to minimise any risk of harm or negative consequences resulting from participation in activities promoted by WVM.

- a. Child participation programmes and activities are based on context analysis with clearly identified needs and expected results, along with how the project will measure progress towards achievement while mitigating risks through risk assessments.

2.9.2. Ethics: Child participation activities are designed and implemented to adhere to principles and ethics which keep the best interests of children as the top priority.

2.9.3. Informed Consent in Child Participation: Child participation activities are voluntary and inclusive (especially of the most vulnerable children), and both children and parents/caregivers make informed decisions regarding participation, including due consideration of the benefits and risks that could be associated with the activity. Consent forms must be kept on file.

2.9.4. Child Travel: When it is in the best interests of children, WVM sometimes helps children travel to domestic or international events, activities or other opportunities.

- a. In such cases the child and the parents or caregivers, or other legally required entity or individual, give informed consent prior to the travel.
- b. The child's health, safety, well-being, and meaningful participation are the most important priorities during travel supported by WVM.
- c. WVM does not facilitate visits of children outside of their country to their sponsor.

2.10. BOARD AND ADVISORY COUNCIL SAFEGUARDING GOVERNANCE

2.10.1. Accountability: WVM Board and Advisory Council hold WVM accountable to fulfilling its safeguarding responsibilities as outlined in the Board-level Partnership Policy for Child and Adult Safeguarding as well as the WVM Safeguarding Policy.

2.10.2. Risk appetite: WVM Board and Advisory Council ensures that WVM's risk appetite statements for Child and Adult Safeguarding set the risk area/category as Risk Averse.

2.10.3. Committee oversight: The WVM Board/AC mandates one of its committees to provide oversight (or in the case of an Advisory Council committee, advice) to safeguarding. Given the heightened level of importance of safeguarding oversight, the full Board/AC receives periodic reports and is informed as well as engaged on safeguarding issues.

2.10.4. Reports provided to the full Board/AC: WVM provides a copy of the Annual Safeguarding Update Report to the WVM Board/AC. WVM also provides the associated Safeguarding Action Plan outlining how it will maintain and improve safeguarding controls as outlined in the Annual Safeguarding Update Report.

2.10.5. Training of Board/Advisory Council members: At inception, the entire WVM Board/Advisory Council is given training by the local Safeguarding Focal Point or by the WVI Safeguarding Unit where it is not practical for the local Safeguarding Focal Point to do so.

- a. Every new member to the WVM Board/Advisory Council is given this training at orientation, and signs an acknowledgement of having reviewed the WVM Safeguarding Policy. This acknowledgement is kept on file.
- b. WVM Board/Advisory Council members re-elected to serve another term repeat the training they received at orientation to refresh their knowledge.

3. DEFINITIONS

Child: Any person below the age of 18. The WVM Safeguarding Policy covers interactions by WVM employees and affiliates with all children anywhere (not only programme participants).

Child protection: All measures taken to prevent and respond to abuse, neglect, exploitation and all other forms of violence against children. A World Vision global sector, together with child participation.

“Community with whom World Vision works” or “living in a World Vision Programming Area”: World Vision uses a broad working definition of these terms to ensure that any individuals who may be subject to power imbalance with World Vision staff, affiliates, or programming are protected through this Policy.

Contractor: WVM regularly contracts with non-employee individuals and organisations to perform services for WVM. These non-employee individuals and organisations may also be referred to as ‘independent contractors’, ‘consultants’, ‘freelancers’, or ‘vendors’, and are referred to in this document as ‘Contractors’. Contractors are distinguished from organisation with which WVM partners to carry out programme activity (including subgrantees). See *Partner*, below.

Partner: A partner organisation, for safeguarding purposes, is a Non-Governmental Organisation, Community-Based Organisation, for-profit enterprise, or other entity that has a written agreement with WVM to implement a programme or activity on WVM’s behalf or in collaboration with WVM. The partner may or may not receive funding from WVM.

Domestic programme: WV programmes within Malaysia, in particular the Community Development Programmes and the Eat Right to Play Right programme.

Safeguarding: Preventing, reporting and responding to harm or abuse by WV employees and affiliates of any children anywhere and of any adults living where WV has a programming presence. Externally to WV, there is often no distinction made between child and adult safeguarding.

Child safeguarding: Preventing, reporting, and responding to harm⁹, abuse or exploitation of any child (< age 18) by a WV employee or affiliate¹⁰. The WVM Safeguarding Policy also requires reporting/referring child abuse cases affecting any child in WV programmes, even if not committed by WV employees or affiliates.

Adult safeguarding: Preventing, reporting, and responding to harm, abuse or exploitation of an adult living where WV has a programming presence (age 18+) by a WV employee or affiliate¹¹. Includes Prevention of Sexual Exploitation and Abuse (PSEA), a frequently cited subset of safeguarding.

Safeguarding incident: Harm or risk of harm resulting from safeguarding misconduct or violations of this Policy to any child or to any adult living where WV has programming presence.

Sexual Exploitation and Abuse (SEA): The term “sexual exploitation” means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including but not limited to profiting monetarily, socially or politically from the sexual exploitation of another. The term “sexual abuse” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.¹²

⁹ Includes injury or death of a child while participating in a WV activity or when involved in a road traffic accident with a WV driver or WV vehicle.

¹⁰ Includes WV employees, volunteers, interns, Board members, visitors, contractors, or partners – as well as employees or sub-contractors of partners and contractors.

¹¹ Ibid.

¹² UN Secretary-General’s Bulletin on protection from sexual exploitation and abuse (PSEA) (ST/SGB/2003/13)

Prevention of Sexual Exploitation and Abuse (PSEA): A term used by the United Nations and International Non-Governmental Organisation community to refer to measures taken to protect vulnerable people from sexual exploitation and abuse by humanitarian aid workers.

Volunteer: A person who is neither employed by WVM nor legally obliged to work for WVM, but who on free will and without expectation of payment or other remuneration, contributes their time, skill, knowledge, efforts and expertise to WVM's work. 'Volunteer' includes a 'business volunteer' in a WVM office or affiliate; a 'supporter volunteer' without physical contact with sponsored children or their records; 'community volunteer' who volunteers on behalf of their community to fulfil the community's responsibilities in an ongoing WVM project; and volunteers or 'incentive workers' from groups or communities targeted for humanitarian assistance. All categories of volunteers are subject to the WVM Safeguarding Policy, except community volunteers for whom the following apply:

1. The community volunteer does not have physical contact with sponsored children or their records as part of their volunteer activities; AND
2. Beyond basic training, WVM does not specify how to complete the relevant activities; AND
3. The community does not perceive or consider this person as 'part of WVM's work' due to their volunteer activities, and if they were to harm a child or adult, would not be expected to hold WVM responsible.

WV employees and affiliates: Refers to the full range of people accountable to WV's Safeguarding policies and protocols, including all employees, interns, volunteers, and Board/Advisory Council members, as well as external parties, including visitors, community volunteers, contractors, partners, and others affiliated with partners or contractors.

4. BACKGROUND

The Partnership Management Policy is authorised by the Partnership Policy on Children's Well Being and Partnership Policy on Code of Conduct. It is grounded in WV's broader ministry mandates—particularly Child Protection, which builds community capacity and strengthens local and national systems that protect children.

This policy is a local contextualisation of the Partnership Management Policy on Child and Adult Safeguarding approved August 2018 (and revised in September 2021) for use in WVM. It replaces and subsumes the WVM Policy on Child Protection Standards approved 2016.

This Policy continues to emphasise the unique vulnerabilities and special protection requirements for children, along with the importance of preventing sexual exploitation and abuse (SEA), in particular, among other forms of abuse of adults living where WV has a programming presence.

5. APPENDICES

1. WVM's Prevention of Harm in Communications



WVM Prevention of Harm in Communica

2. WVM's Safeguarding Behaviour Protocols



WVM Safeguarding Behaviour Protocols

3. WVM GC Exemption Approval Letter



WVM Exemption Approval Letter (Cor

4. WVM Safeguarding Screening Policy



WVM Screening Policy (2022)_v1.pdf

5. Partnership Management Policy on Child and Adult Safeguarding 2021



FINAL Partnership Management Policy