

# CHILD PROTECTION POLICY

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## Disclaimer

The Report quotes data and information from both Government and Non-Government sources. Photo

The pictures in this document have been taken randomly. These pictures do not necessarily depict children who have suffered, been trafficked or abused.



# INTRODUCTION

Cambodian Children's Fund (CCF) provides life-changing education, nourishment and healing to vulnerable children from some of Cambodia's most destitute communities. Today CCF cares for more than 2,000 children and extends its services to provide for families and communities in crisis.

This Child Protection Policy arises from the Cambodian Children's Fund's commitment to Child Protection and its zero tolerance approach to child abuse and child pornography. CCF is determined to take all necessary steps to manage and minimise any potential risk of child abuse for the children and young people in the organisation's care and to protect them from harm.

CCF takes its duty of care responsibilities seriously and is committed to ensuring that it maintains a safe, nurturing and joyful environment for the students in its care. It recognizes that any person working closely with children is in a particular position with regard to their power and influence over a child, and works diligently to prevent any abuse of this position.

Cambodian Children's Fund (CCF) as an organization, and all adults involved in CCF, accept the paramount duty to safeguard the welfare of all children in its care, without exception. This policy outlines our commitment to providing the children who live or study at CCF facilities or participate in CCF activities with the safest possible environment. This requires action to prevent intentional and unintentional abuse and harm of all kinds.

The Policy is fully approved and supported by CCF's Governing Bodies and Executive Management Team.

## Guiding Principles

CCF's child protection policy is guided by 4 key principles:

- Zero tolerance of child abuse
- Primacy of the interests of the child
- Individual and collective responsibility for child protection
- Active management approach to risk

The Policy's overall goal:

*The effective protection  
of all children in the  
care of the Cambodian  
Children's Fund from  
abuse of all kinds.*



# SCOPE

The policy applies to:

All CCF entities including Cambodian Children's Fund (US & Cambodia), Cambodian Children's Fund Australia Limited, Cambodian Children's Fund (Hong Kong) Limited and Cambodian Children's Fund United Kingdom

This includes all CCF Staff, including staff located outside Cambodia All contractors and NGOs funded by CCF, including:

- **any organization,**
- **employee (paid or unpaid),**
- **contractor, consultant, volunteer, visitor, donor, supporter and any partner agency.**

CCF expects any organisation, employee (paid and unpaid), contractors, consultants, volunteer and any partner agency or implementing partner to act in accordance with the principals detailed in this policy. For the purpose of this policy, “children” shall mean anyone under the age of 18 years and under the care of CCF.



## Governing Legislation

CCF's Child Protection Policy is compliant with international primary child protection legislation expressed in the:

- United Nations Convention on the Rights of the Child (Cambodia acceded 1992)
- Law on Suppression of Human Trafficking and Sexual Exploitation 2008 (Cambodia)
- Child Abuse Prevention and Treatment Act, 1974 (USA)
- Family Law Act 1975 (Commonwealth) (Australia)
- The Children Act 1989 (UK)



# THE POLICY

## Purpose of the Policy

This Child Protection Policy (CPP) has been developed to provide a practical guide to prevent child abuse in CCF's facilities and programs. It outlines a range of risk management strategies that will be implemented, and which will reduce the risk of children being harmed. It is complemented by the CCF's Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) policy.



- The CPP will demonstrate CCF's commitment to protect children from harm and abuse.
- The CPP aims to educate staff and others about child abuse and promote a child safe and a child friendly culture where everyone is committed to keeping children safe.
- The CPP aims to create an open and aware environment where concerns for the safety and well being of a child can be raised and managed in a fair and just manner, which protects the rights of all.
- Additionally, the CPP will provide guidance on how to respond to concerns and allegations of child abuse. It provides guidance to staff and others on how to work respectfully and effectively with children. This will provide all stakeholders, including staff and others with a safe working environment.
- CCF is obliged to adhere to local and international child protection criminal laws, which prohibit the abuse and exploitation of children. These include local laws where CCF programs exist, and international laws and conventions in relation to all forms of child abuse and child exploitation, including child sex tourism, child sex trafficking, child labour and child sexual abuse.

## Guiding Principles

The CCF Child Protection Policy guiding principles are explained below:

### **Zero Tolerance of child abuse**

Child abuse is not tolerated by CCF. CCF takes an active approach to risk management and ensures that its staff are selected, trained, and obligated accordingly. CCF will not knowingly employ or use the services of anyone known or likely to pose an unacceptable risk to children.

### **Primacy of the interests of the child**

CCF places the interests of the children in its care as its highest priority. Their physical and emotional security and welfare along with the development of their abilities and characters are its major concern and their protection will always be its highest value.

### **Individual and Collective responsibility for child protection**

CCF recognises its legal and moral accountability and the accountability of all individuals concerned for child protection. It regards child protection as the responsibility of all CCF staff at all levels and requires the active support and cooperation of all involved with the organisation, including employees, any organization, employee (paid or unpaid), contractor, consultant, volunteer, visitor, donor, supporter, and any partner agency.

### **Active management approach to risk**

CCF will ensure all programs have appropriate active risk management procedures as follows:

- Risk assessment completed for all programs
- Regular reviews to identify emerging and new risks
- Ensure consultation with all program stakeholders
- Ensure controls are identified, implemented and allocated to responsible staff

# DEFINITIONS

**Child and young person.** A child or young person is regarded to be any person under the age of 18 years, unless a nation's laws recognise adulthood earlier. For the purposes of this policy CCF recognises a child to be a person under 18 years of age.

**Child protection.** Is the term used to describe the responsibilities and activities undertaken to prevent or stop children being abused or maltreated.

**Child abuse.** Abuse happens to male and female children of all ages, ethnicity and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion. Child abuse includes physical, sexual, emotional, neglect, bullying, child labour and domestic violence.

**Duty of care.** Duty of care is a common law concept that refers to the responsibility of the organisation to provide children with an adequate level of protection against harm. It is the duty of the organisation to protect children from all reasonably foreseeable risk of injury.

**Physical abuse.** This occurs when a person purposefully injures or threatens to injure a child or young person. This may take the form of slapping, punching, shaking, kicking, burning, shoving or grabbing. The injury may take the form of bruises, cuts, burns or fractures.

**Emotional abuse.** This occurs when a child is repeatedly rejected or frightened by threats. This may involve name calling, being put down or continual coldness from parent or care giver to the extent that it affects the child's physical and emotional growth.

**Neglect.** Neglect is the persistent failure or the deliberate denial to provide the child with clean water, food, shelter, sanitation or supervision or care to the extent that the child's health and development are placed at risk.





**Sexual Abuse.** This occurs when a child or young person is used by an older or bigger child, adolescent or adult for his or her own sexual stimulation or gratification - regardless of the age of majority or age of consent locally. These can be contact or non-contact acts, including threats and exposure to pornography.

**Child-Sex Tourism.** End Child Prostitution, Child Pornography and Trafficking of Children (ECPAT) International defines child-sex tourism as: “...the commercial sexual exploitation of children by men or women who travel from one place to another, usually from a richer country to one that is less developed, and there engage in sexual acts with children, defined as anyone aged under 18 years of age” (ECPAT International, 2006).

**Online Child Sexual Exploitation (OCSE).** OCSE is an form of exploitation and child sexual abuse that is enabled by the internet, which includes the production, possession and distribution of online CSAM, live-streaming of CSEA and the grooming of potential victims

**Child Sexual Exploitation and Abuse (CSEA).** CSEA This is an inclusive term for both sexual abuse and exploitation by an adult. Sexual exploitation involves sexual contact with the child in exchange for some form of remuneration, which can be monetary, but children may only receive food or somewhere to sleep. Sexual abuse is understood as sexual contact with the child’s private areas with or without their consent and with or without physical force. Abuse requires no element of exchange and can occur solely for the sexual gratification of the person committing the act.

**Child Sexual Abuse Material (CSAM).** CSAM was previously known as ‘child pornography’, this term refers to any material depicting acts of sexual abuse and/or focusing on the genitalia of the child. To comply with the international terminology guidelines, the term CSAM should be used instead of ‘child pornography’. Note Cambodian legislation

currently uses the term child pornography as the offence title.

**Grooming** is the short name for the solicitation of children for sexual purposes. In the OCSE context, it refers to the process of establishing or building a relationship with a child in person or through an online system or other technology to achieve online or offline sexual contact with that child.

**Harassment.** CCF PSEAH policy defines harassment as verbal bullying includes insults, taunts, threats and ridicule.

**Bullying** is the inappropriate use of power by an individual or group, with intent to injure either physically or emotionally. It is usually deliberate and repetitive. The bullying may be physical or psychological (verbal and non- verbal).

- Physically, bullying includes pushing, hitting, punching, kicking or any other action causing hurt or injury.
- Verbal bullying includes insults, taunts, threats and ridicule.
- Psychological bullying includes physical intimidation and ostracism.

### **Exposure to Domestic Violence**

Domestic violence occurs when children and young people witness or experience the chronic domination, coercion, intimidation, and victimisation of one person by another by physical, sexual, or emotional means within intimate relationships. (Adapted from the Australian Medical Association definition).

### **Particularly vulnerable children**

Child abuse takes place not only within the family environment, but also outside the family, including institutions, at work, on the streets, in war zones and emergencies.

# CHILD PROTECTION & RISK MANAGEMENT

## CCF Child Protection Risk Management and Control

CCF recognizes that there are several potential risks to children in the delivery of its programs to the vulnerable and disadvantaged. In recognizing these risks, CCF proactively assesses and manages these risks to children in our programs (and in the communities in which we work) to reduce the risk of harm. This is achieved by examining each program and its potential impact on children. Programs that involve direct work with children are considered a higher risk, and therefore require more stringent child protection procedures. However, as children are part of every community in which we work, we are always mindful of potential risks.

Risk management is an ongoing part of every activity, and CCF conducts a child protection risk assessment on every new and emerging program and projects, included in the project management program.

Staff and others should continually be aware of risks, and be actively minimizing opportunities and situations where children may be harmed.

Any allegations of child abuse may be reported to the [safeguarding@cambodianchildrensfund.org](mailto:safeguarding@cambodianchildrensfund.org). The reporting options will be revised during annual training.

## Awareness

All representatives will be individually and collectively responsible for child protection and will be made aware of this policy and any related guidelines, codes, or protocols. Designated staff are responsible for monitoring child protection issues and will facilitate policy implementation, staff training and awareness, and incident reporting.

Child friendly information is available to ensure children understand about their safety and protection and feel comfortable about speaking to someone if they have any concerns. Children will be made aware of an independent adult to whom they can refer any concerns. Children will be encouraged to say at any time what they find acceptable and unacceptable in the way they are approached by adults or other young people.

## Recruitment Procedures

Procedures for staff recruitment contain appropriate child protection measures, including, wherever possible, the provision of background information and references. CCF will reject any persons who might be considered a risk to child safety.

To assist in the recruitment and screening processes CCF will require national police checks (or equivalent standard) to be conducted on all staff, both expatriate and Cambodian alike. References will need to be supplied and referees will be contacted for verbal confirmation of the applicant's character. Behavioural based interviews will be conducted with all applicants applying for positions that involve working with children. All staff, contractors and associates will be required to immediately disclose all charges, convictions and any other outcomes of an offence which occurred before or occurs during their association with CCF that relate to child exploitation and abuse in any form in any jurisdiction.

All successful candidates and existing representatives are clearly informed of their contractual requirement to comply with this policy and sign and comply with CCF's Child Protection Code of Conduct prior to commencing work.



## Training

CCF personnel are subject to regular training on child protection and are required to keep their knowledge up to date. All CCF staff are to complete the online or face to face training annually to ensure that they are capable and competent to conduct the initial complaint handling and comply with the reporting processes.

The Child Protection Manager overseen by the Chief Operating Officer will have the role of ensuring that all staff are up to date with policy changes and the implementing of training regimes for all staff and children alike.

## Conduct

All representatives are required to behave with children in a manner that fully respects their dignity and rights, and minimizes any possible situation of risk, consistent with CCF's Child Protection Code of Conduct (at Annex A). All representatives will:

- Treat all children with respect regardless of distinguishing factors such as age, race, religion, sexuality, disability, or other status.
- Not behave towards them in any manner, physical or verbal, which is or can be construed as inappropriate, harassing, abusive, provocative, or demeaning.
- Not engage children in any form of sexual activity or acts, including paying for sexual services or acts, where under relevant legislation the child is below the age of consent, or the act(s) constitute an offence.
- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children into their home unless they are at immediate risk.
- Will take seriously any complaint of child abuse, from whatever source, and will report any known breach of this code or of the Child Protection Policy, or any concerns relating to the safety of the children to CCF.
- Use any communications or recording technology or social media appropriately, and never to exploit, harass or put children at risk, or to access child pornography via any medium or from any source.
- Not employ physical punishment as a disciplinary tool.
- Not employ children for domestic or other work inappropriate to their age or developmental stage or which interferes with access to education or recreation, or which places them at risk of injury.
- Comply with all relevant laws.
- Report concerns or allegations of child abuse as swiftly as possible and as set down in relevant procedures.
- Ensure that adults or personnel who are not permanent approved staff must have regular CCF staff present when in contact with children, cannot take children out of CCF facilities or make independent contact with children's families.

CCF will always ensure that information or images about children are never used in a way that places children at risk or compromises their safety or dignity. Regulations governing the use of photography and videos are in place as part of the child protection regime (Annex B).

## Communication & Use of Child Images

CCF will at all times portray children in a respectful, appropriate and consensual way.

- A child should always be portrayed in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- A child and its family must always be asked for consent when using their images. When asking for consent to use the image, details should be given as to how and where this image will be used.
- There should be no identifying information of the child used in the publication of images or their location.
- Children should be portrayed as part of their community.
- Local cultural traditions should be assessed regarding restrictions for reproducing personal images.
- Images should be an honest representation of the context and the facts.
- When sending images electronically, file labels should not reveal identifying information.

CCF maintains strong communication links with the parents or those otherwise legally responsible for the children in its care and ensures that they are appropriately informed about all issues regarding the children and their welfare.

CCF respects the confidentiality of information regarding children's health, family backgrounds and personal histories. This private information is accessed only by authorized staff on a 'need to know' basis.

Guidelines, rules and implementation procedures relating to child protection are available to all CCF personnel.

Only authorized personnel with approval from the Senior Management Team can make changes to the policy or decisions regarding child protection.

The Child Protection policy and all associated policies, such as the Child Protection Code of Conduct and Child Protection Reporting Process will be reviewed at least every five years and amended as required.

## Sponsorship Guidelines

CCF recognises the need to implement specific guidelines to manage the child protection risks within its sponsorship programs. CCF has provided a detailed guide to sponsors on its website, the document is titled "Guidance on Sponsorship with CCF". CCF's guidelines in relation to sponsors and children include:

- All communications between sponsors and children are monitored by qualified CCF staff and communications which contain inappropriate content, including cultural, political, or religious material which may cause offence are strictly prohibited.
- All visits by sponsors must be arranged well in advance through the CCF Sponsorship Department.

- All sponsors will be interviewed before each visit and will be required to read the Child Protection Policy and sign the Child Protection Code of Conduct.
- Supervised outings from CCF facilities for a morning or afternoon to a market or mall may be permitted for children of a suitable age.
- Qualified CCF staff will be present at all times during a sponsor visit and during authorized outings.
- Sponsors and sponsored children and their families must not exchange contact details during visits.
- Children must not be invited to leave or be taken away from their communities.



## Reporting & Response

In the event of any incidents, comments, suspicions or concerns, the case must be immediately reported to senior management and an investigation commenced. All cases of abuse will be investigated thoroughly in line with established procedures. When responding to concerns or allegations of harm or abuse, the ultimate guiding principle will be the best interests and well-being of the child or children involved.

A child reporting concerns or claiming to be the subject of abuse will be protected, taken seriously, and treated with respect. He or she will be reassured that they are not to blame – he or she will never be treated with disbelief or in a manner that might cause shame or embarrassment. CCF will immediately remove a child from an abusive environment, seek medical treatment for any injuries and make any necessary further referrals.

In the event of an allegation made in good faith which is shown to be unfounded or untrue, no action will be taken against the maker of the allegation. False and malicious allegations are unacceptable, and perpetrators will be subject to appropriate action. Failure of a CCF representative to report suspected child abuse will render the perpetrator liable to criminal sanction and/or termination of employment.

All CCF Staff and Contact Officers will be made aware of the Child Reporting Process. The Child Protection Manager will be responsible for the dissemination and investigation of all initial complaints and with the assistance of the Chief Operating Officer will make an assessment on the allegation and take appropriate action which can range from no-action, behavioural management, counseling, referring the complaint to local law enforcement/Police and dismissal.

Reports of suspected breached of this policy or other concerning behaviour may be reported to the following [safeguarding@cambodianchildrensfund.org](mailto:safeguarding@cambodianchildrensfund.org)

# CHILD PROTECTION CODE OF CONDUCT

## Annex A I

Staff, contractors, consultants, volunteers

I, \_\_\_\_\_ (insert name) agree that in the course of my association with the Cambodian Children's Fund,

### I will:

- Treat all children and young people with respect
- regardless of race, colour, sex, language, disability, religion, political or other opinion, national, ethnic or social origin, birth or other status
- Provide a welcoming, inclusive and safe environment for all children, young people, parents, family, guardians, employees and volunteers
- Encourage children, young people, parents, family, guardians, employees and volunteers to speak up about issues that affect them
- Refrain from using corporal punishment on children
- Immediately report concerns or allegations of child abuse in accordance with Cambodian Children's Fund reporting process
- Comply with local, national and international child protection laws
- Ensure that, whenever possible, another adult is present when I am working with children, or in the proximity of children
- Advise my supervisor/manager of my involvement in any situation where my actions could be misinterpreted
- Advise my supervisor/manager if I am involved in any situation which would be likely to bring the organization into disrepute, and
- Advise my supervisor/manager if I am investigated for any crime or charged with any criminal offence

### I will not:

- Use inappropriate language – whether of an offensive, discriminatory, demeaning, abusive or sexual nature – when speaking with or whilst in the presence of a child or young person

- Engage in behaviour to shame, humiliate, belittle or degrade a child or young person, or otherwise emotionally abuse a child or young person
- Marry a person under the age of 18
- Act in a sexually provocative manner or engage children in any form of sexual activity, including paying for sexual services
- Hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way
- Condone or participate in, behaviour with children which is illegal, unsafe or abusive
- Discriminate against or in favour of particular children to the exclusion of others
- Spend time outside work requirements with any child or young person connected with Cambodian Children's Fund programs
- Invite unaccompanied children into their home, unless they are at immediate risk.
- Hire children for domestic or any other labour which is inappropriate for their age or development, interferes with their education or play, or places them at risk of injury
- Do things for children of a personal nature that they can do for themselves such as toileting them or changing their clothes
- Sleep in close proximity to any children unless it is absolutely necessary, in which case I will keep my supervisor/manager informed and ensure another adult is present, where possible (noting that this does not apply to my own children)
- Access or create sexually abusive images of children, and
- Use computers, mobile phones, video or digital cameras or any other technology for the purpose of exploiting or harassing children



## Confidentiality and Photography Regulations

The protection of the child is the most important consideration for the Cambodian Children's Fund (CCF). CCF deals with many people and many projects across a range of programs and facilities and with people of all ages and in many different circumstances. In all situations, information is vital and this information, as much as the children in CCF's care, has to be protected. Because of its international spread, CCF's information protection measures have to be, and are, compliant with a range of relevant international legislation, including the following:

- Online Privacy Protection Act 2003: California, USA
- Privacy Act 1988: Australia
- Data Protection Act 1998: United Kingdom
- European Data Protection Directive (Directive 95/46/EC).

### Confidentiality

All CCF staff, volunteers, visitors and those involved in the conduct of CCF's activities in any capacity are required to share CCF's information protection burden. CCF's ability to share information and allow the use of photography, video or similar methods is dependent on agreement with the conditions set out below.

#### I undertake that:

- I recognise CCF's need to retain and maintain significant amounts of data and information, personal and organizational, relating to itself and other parties and I also recognise its obligation to maintain the confidentiality of such information.
- During and after my involvement with CCF, I may become privy to information relating, for example, to CCF's finance, personnel, projects, plans or problems. I undertake to keep CCF's information, disclosed to me or discovered by me, in strictest confidence and will not disclose or use it, beyond what is normal and necessary in the conduct of my relationship with CCF, without CCF's agreement.
- In the event that I become aware of Third Party information, relating to the involvement or engagement of other organisations or individuals with CCF, I undertake to maintain the confidentiality of that information and will

not make, or seek to make, any use of such material without specific permission from CCF.

- If I wish to write about CCF for publication, lecture about its activities or impact or engage in similar such activities, I will seek specific agreement from CCF, which will normally be provided in writing by an authorised member of CCF staff. Disclosure required by law remains unrestricted.

### Photography and the Use of Video

- Before photographing or filming a child for work related purposes, I will assess and comply with local traditions or restrictions on reproducing personal images.
- I will not take photos without prior agreement of authorised CCF staff, namely the Executive Director, Program Manager, or Facility Manager.
- The agreement of those whom I propose to photograph or record will be sought before I do so and I will make clear how the resulting material will be used.
- I will respect the dignity of persons photographed in my own behaviour and in my photographs or recordings.
- I will respect the dignity of persons photographed in my own behaviour and in my photographs or recordings.

- My photography or video will ensure that children are adequately dressed.
- I will not take or attempt to take photos which can be deemed intrusive or insensitive, such as photos in dwellings, sleeping areas, people bathing, or in distress.
- I will at no time make recordings or images which are or can be construed as sexually suggestive.
- I will not use images for public (including blog) or commercial purposes without CCF's express permission.
- I will ensure that my images honestly represent the facts and context.
- In using CCF related information on social media, I will be alive to the need to protect the privacy of CCF related individuals. I will not publicise CCF addresses and will not use the real names of CCF children.
- I will ensure file labels do not reveal identifying information about a child when sending images electronically.
- I have read, understood and undertake to comply with the above requirements.

**Statement to be signed by all Cambodian Children's Fund staff, contractors, consultants and volunteers**

I confirm that I have read and understood the Cambodian Children's Fund:

- Child Protection Policy, and
- Child Protection Code of Conduct

I agree to comply with the Policy and Code of Conduct. I understand that a breach of the Policy or Code may provide grounds for my employment/engagement with the Cambodian Children's Fund to be terminated.

I also understand that a breach of the Policy or Code could result in criminal prosecution. I understand that it is my responsibility, as a person engaged by the Cambodian Children's Fund, to use common sense and avoid actions or behaviours that are abusive or exploitative of children or young people, or could be construed as such.

I authorize the Cambodian Children's Fund to undertake any necessary inquiries, including criminal record checks and reference checks, as part of my appointment or recruitment process. I confirm my willingness to participate in Cambodian Children's Fund training sessions on child protection.

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

Position: \_\_\_\_\_

Signed: \_\_\_\_\_

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

# CHILD PROTECTION CODE OF CONDUCT

## Annex A2

### Visitors

I, \_\_\_\_\_ (insert name) agree that in the course of my association with the Cambodian Children's Fund,

#### I will:

- Treat all children and young people with respect regardless of race, colour, sex, language, disability, religion, political or other opinion, national, ethnic or social origin, birth or other status
- Assist in providing a welcoming, inclusive and safe environment for all children, young people, parents, family, guardians, employees and volunteers
- Encourage children, young people, parents, family, guardians, employees and volunteers to speak up about issues that affect them
- Refrain from using corporal punishment on children Immediately report concerns or allegations of child abuse in accordance with Cambodian Children's Fund reporting process
- Comply with local, national and international child protection laws

#### I will not:

- Use inappropriate language – whether of an offensive, discriminatory, demeaning, abusive or sexual nature – when speaking with or whilst in the presence of a child or young person
- Engage in behaviour to shame, humiliate, belittle or degrade a child or young person, or otherwise emotionally abuse a child or young person
- Act in a sexually provocative manner or engage children in any form of sexual activity, including paying for sexual services
- Hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way
- Condone or participate in, behaviour with children which is illegal, unsafe or abusive
- Discriminate against or in favour of particular children to the exclusion of others
- Spend time outside authorised visits with any child or young person connected with Cambodian Children's Fund programs
- Hire children for domestic or any other labour which is inappropriate for their age or development, interferes with their education or play, or places them at risk of injury
- Do things for children of a personal nature that they can do for themselves such as toileting them or changing their clothes
- Access or create sexually abusive images of children, and
- Use computers, mobile phones, video or digital cameras or any other technology for the purpose of exploiting or harassing children



## Confidentiality and Photography Regulations

### Confidentiality

The protection of the child is the most important consideration for the Cambodian Children's Fund (CCF). CCF deals with many people and many projects across a range of programs and facilities and with people of all ages and in many different circumstances. In all situations, information is vital and this information, as much as the children in CCF's care, has to be protected. Because of its international spread, CCF's information protection measures have to be, and are, compliant with a range of relevant international legislation, including the following:

- Online Privacy Protection Act 2003: California, USA
- Privacy Act 1988: Australia
- Data Protection Act 1998: United Kingdom
- European Data Protection Directive (Directive 95/46/EC).

In the light of the above, CCF has to ask all of its visitors to share our information protection burden. CCF's ability to share information with you and allow you to record your visit with photos or video or similar methods is dependent on your agreement with the conditions set out below.

### Photography

CCF enjoys a level of trust that allows us into areas where others may not be welcomed. We need to respect that trust and never abuse it. Just as visitors to any family are welcome to make a record of their visit using a combination of good manners and good sense to avoid the pitfalls that surround that area, CCF asks all visitors to use the same level of sensitivity on their visit to its family. The legal requirements governing the use of personal information, which includes images of individuals, referred to above, also apply.

Please read all of what follows and sign your agreement where indicated.

### Confidentiality

#### I undertake that:

- I recognise CCF's need to retain and maintain significant amounts of data and information, personal and organisational, relating to itself and other parties and I also recognise its obligation to maintain the confidentiality of such information.
- During and after my visit, I may become privy to information relating, for example, to CCF's finance, personnel, projects, plans or problems. I undertake to keep CCF's information, disclosed to me or discovered by me, in strictest confidence and will not disclose or use it, beyond what is normal and necessary in the conduct of my relationship with CCF, without CCF's agreement.
- In the event that I become aware of Third Party information, relating to the involvement or engagement of other organisations or individuals with CCF, I undertake to maintain the confidentiality of that information and will not make, or seek to make, any use of such material without specific permission from CCF.
- If I wish to write about CCF for publication, lecture about its activities or impact or engage in similar such activities, I will seek specific agreement from CCF, which will normally be provided in writing by an authorised member of CCF staff. Disclosure required by law remains unrestricted.

## Photography and the Use of Video

- Before photographing or filming a child for work related purposes, I will assess and comply with local traditions or restrictions on reproducing personal images.
- I will not take photos without prior agreement of authorised CCF staff, namely the Executive Director, Program Manager, Facility Manager or the Sponsorship Officers.
- The agreement of those whom I propose to photograph or record will be sought before I do so and I will make clear how the resulting material will be used.
- My photography and video taking will be limited to the level necessary to provide adequate mementos of my visit.
- I will respect the dignity of persons photographed in my own behaviour and in my photographs or recordings.
- My photography or video will ensure that children are adequately dressed.
- I will not take or attempt to take photos of those whom I encounter in the course of my visit which can be deemed intrusive or insensitive, such as photos into dwellings, sleeping areas, people bathing, or in distress.
- I will at no time make recordings or images which are or can be construed as sexually suggestive.
- I will not use images for public (including blog) or commercial purposes without CCF's express permission.
- I will ensure that my images honestly represent the facts and context.
- In using CCF related information on social media, I will be alive to the need to protect the privacy of CCF related individuals. I will not publicise CCF addresses and will not use the real names of CCF children.
- Ensure file labels do not reveal identifying information about a child when sending images electronically.

**I have read, understood and undertake to comply with the above requirements.**

## Statement to be signed by all CCF Visitors

**I confirm that I have read and understood the Cambodian Children's Fund:**

- Child Protection Policy, and
- Child Protection Code of Conduct

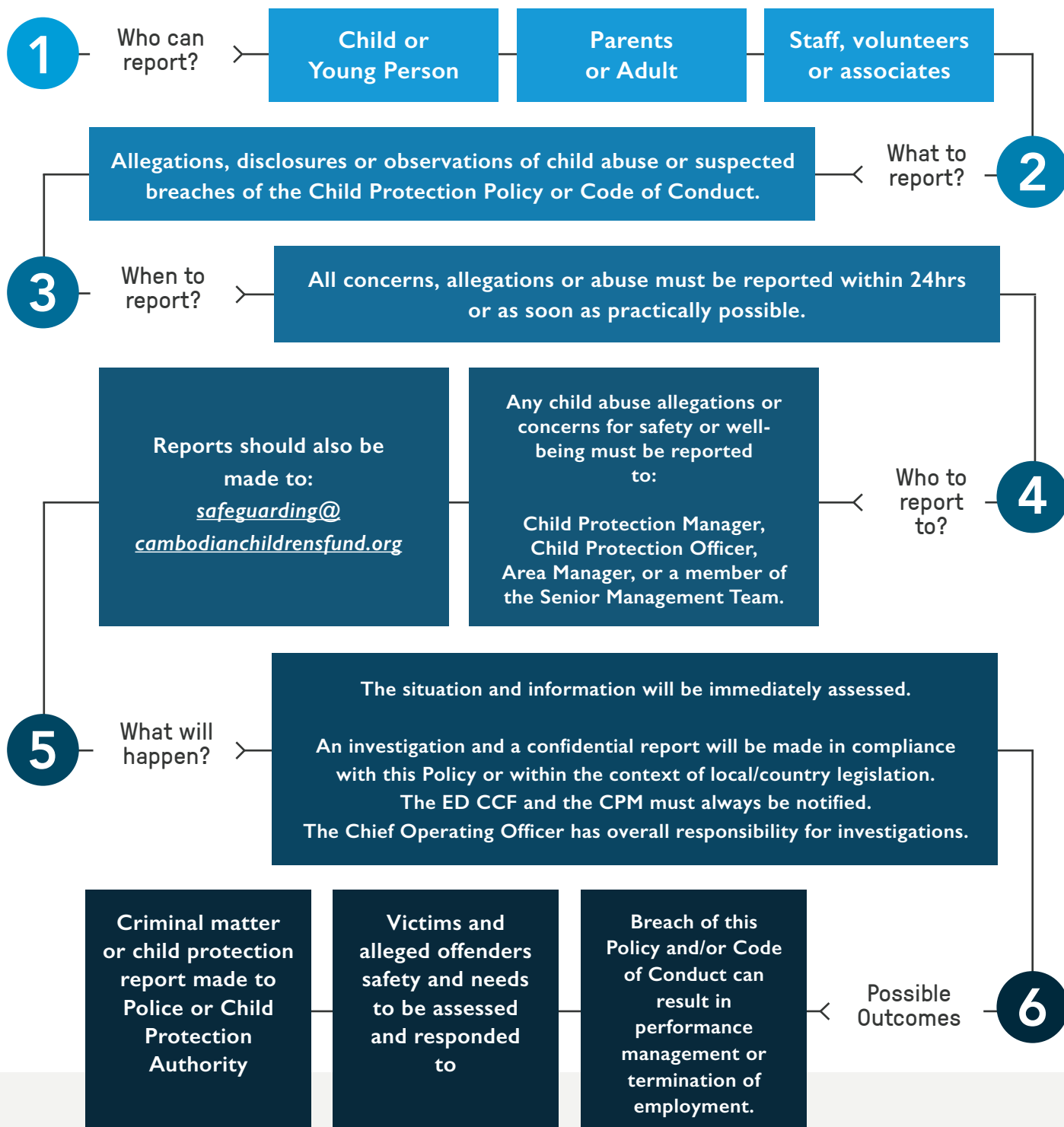
**I agree to comply with the Policy and Code of Conduct.**

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

Signed: \_\_\_\_\_

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

## Annex B



Chief Operating Officer as well as the Child Protection Manager can be contacted at ANY time for advice

Feedback and consultation to be given where possible to those directly involved or affected protecting confidentiality and privacy.





# CHILD PROTECTION POLICY

