SAFEGUARDING POLICY

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Background

Operation Smile recognizes that violence is a global phenomenon, occurring in all countries and in all societies. It may take the shape of physical, sexual, emotional abuse and neglect of children, young persons, and vulnerable adults. Intersecting identities, due to gender, sexual orientation, ethnic origin, disability, age, or illness, may also carry greater vulnerability and an increased risk of violence. Children and young persons, as well as adults, can be potentially subjected to exploitation, abuse, violence and neglect in families, communities, institutions, organizations, private places, public places by various circumstances by a variety of people. This Global Policy has been developed to address and protect children, young persons and vulnerable adults from potential abuse and exploitation during their involvement with Operation Smile.[1]

Scope and Reach

As a Global Policy, it applies to all Operation Smile entities, namely:

a. Operation Smile, Inc. (OSI), with its Headquarters in the United States, and all of its Partner Countries;
b. All its program countries, many of which operate as separate and distinct legal entities (Foundations), and some as branches (Representative Offices); and
c. Regional Offices.

[1] We would like to acknowledge the following organizations, as we have drawn inspiration from their safeguarding and child protection policies and guidelines: Save the Children, Plan International, and UNICEF.

This policy is mandatory for and applicable to all Operation Smile staff[2] worldwide (regardless of nature and terms of association or contract), and program visitors. It also covers implementing partners whom we fund, and who we expect to work under the policy as a result of their involvement with Operation Smile. The policy is binding for staff both in and outside of working hours. All staff, partners, associates, affiliates, and program visitors are obliged to sign the *Safeguarding Code of Conduct*, committing themselves to adhering to the principles and procedures of this Global Policy.

This policy demonstrates how Operation Smile will meet its ethical and legal obligations and reassure staff, program :

i. what they can expect Operation Smile to do to safeguard and protect vulnerable persons;
ii. that they have the right to safely voice any concerns, allegations, suspicions, or raise a complaint through an established reporting procedure;
iii. that all reports of abuse or potential abuse are dealt with in a serious and effective manner;
iv. that there is an efficient recording and monitoring system in place; and
v. that a robust 'safe' recruitment procedure is in place.

Foundations and Representative Offices may enhance the standards and requirements set out in this policy, if required by local law or practices. Whilst it is recognized that local legislation may vary from country to country, this Global Policy identifies the minimum standards of Operation Smile and may exceed the requirements of local legislation.

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[2] *Staff* are individuals who receive a regular salary for work in any entity of Operational Smile, as well as individuals paid by or through an Operation Smile entity, but located in another entity. Please see Annex 1 for the full definition of staff.

The safeguarding and protective scope of this Global Policy covers:

• all children, those aged under 18, regardless of the nature of their association with Operation Smile or our programs, projects, and initiatives; and

• any child or adult who is the target of, or who we know will be immediately affected by, one or more Operation Smile associated programs, projects, or initiative outputs, hereafter referred to as program participant[3]. While our origins are that of a child-focused organization, our work reaches and involves program participants of all ages, and as such, we are responsible for safeguarding and protecting these program participants, regardless of their age.

Violence[4] against any child or program participant is against, not only the values and principles we uphold as described in this Global Policy, but also in direct opposition to the aims of our work. It is therefore imperative to our mandate for us to ensure that children and program participants do not experience harm[5], abuse[6], exploitation, or any other form of violence because of their engagement with us or our programs, projects and initiatives.

Safeguarding is the responsibility that we must ensure that no harm is done to children, young people, or vulnerable adults; that they are not exposed to discrimination, neglect,

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[3] Any child or adult that is the target of, and that we know will be immediately affected by one or more project or initiative output; irrespective of whether these are delivered directly by Operation Smile, or by partners or organizations who are acting on behalf of Operation Smile. Please see Annex 1 for the full definition of *Program Participant*.

[4] *Violence* is used throughout this policy to describe all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation. Violence consists of anything that individuals, groups, institutions, or organizations do or fail to do, intentionally or unintentionally, which either results in, or has a high likelihood of resulting in, actual or potential harm to a child, young person or adult's wellbeing, dignity, survival and/or development. Please see Annex 1 for the full definition of violence.

[5] *Harm* denotes any intended or unintended detrimental effect on a person's physical, psychological, or emotional wellbeing. Please see Annex 1 for the full definition of harm.

[6] *Abuse* includes all forms of physical or mental violence, injury or violence, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation. Please see Annex 1 for the full definition of Abuse.

harm, and abuse; and that any concerns that we have about their safety within the communities in which we work are dealt with in an appropriate manner. These preventative, responsive, and referral measures that we undertake to protect children and program participants include protection from sexual harassment, exploitation, and abuse (PSHEA).

This Global Policy is also gender-responsive, as we acknowledge the complexity of the prejudice and/or inequality faced by some members of society in accessing care. We use this understanding to identify and respond to an individual's specific safeguarding needs.

Purpose

The purpose of this Global Policy and associated procedures is to provide clarity to all on how they should engage with children, young people and vulnerable adults when working for, on behalf of, or in partnership with Operation Smile.

Specifically, the policy sets out to ensure that:

• all staff, associates and program visitors understand the importance of preventing violence in all its forms and their responsibility to ensure that they, their behavior, and work does not result in violence or harm against a child or program participant;

• all staff, associates and program visitors understand their role in preventing violence and harm as well as the consequences of breaching this policy;

• all staff, associates and program visitors understand their responsibility to report any concerns relating to violence and harm and have access to clear guidelines on how to report suspected breaches of this policy;

• all staff, associates and program visitors understand our commitment to upholding the highest level of personal and professional conduct and further understand our commitment to ensuring zero tolerance or inaction on reports of any safeguarding concerns; and

• children and program participants are aware of our responsibilities to prevent and respond to any harm against them arising from actions and behaviors of our staff, associates and program visitors and the routes for reporting such incidents.

Core values

Four core values underpin the work of Operation Smile in transforming lives: resilience, impact, compassion, and integrity.

Our **resilience** allows us to adapt to difficult and challenging situations, always finding a way forward. We work tirelessly to meet the unmet needs of people across the globe, finding new and inventive ways when needed. We challenge inequality, discrimination and exclusion, and work to promote safe practices, approaches, and interventions that recognize and respond to safeguarding needs.

We strive for maximum **impact** of our work, leaving communities stronger by delivering transformative services for children, families, and communities. We enable medical professionals and volunteers to better serve the future needs of communities by sharing our knowledge, skill set, and expertise in the field. This includes strengthening the capacity of all staff to fully understand their safeguarding roles and responsibilities. We take positive action to prevent anyone who might be a risk to children and program participants from becoming involved with us at all.

Through our **compassion**, we care wholeheartedly for our patients, their families, the communities we serve and the people who help us serve them. We create a safe and inclusive culture that allows children, program participants, staff, and program visitors to thrive and feel secure while engaging with Operation Smile International. We promote the active involvement of children and program participants in their own protection.

We do our work with **integrity**, upholding the high standards and moral principles our co-founders established 40 years ago, priding ourselves on the quality of care we continuously provide to patients, families, and communities around the globe. In the same spirit, we have zero tolerance to inaction on safeguarding and SHEA reports, responding in a timely, effective, safe, comprehensive, procedurally fair, and confidential manner to all safeguarding allegations and incidents, ensuring victims'/survivors' perspectives in response to safeguarding concerns.

Guiding principles

Operation Smile's core values outline how we should work to achieve our purpose. Our commitment to safeguarding and the application of this Global Policy derives from our dedication to these values and the following set of guiding principles.

Irrefutable rights: The *United Nations Convention on the Rights of the Child* provides a universal set of standards for the protection of children and **young persons** that cannot be questioned or denied. Together with the *Universal Declaration of Human Rights* that recognizes basic human rights, the dignity, worth and equal rights of people of all ages, these standards are applied holistically, providing a comprehensive framework for the protection and participation of all children and program participants. These irrefutable rights underpin the very foundation of Operation Smile. We respect and uphold the rights of all children and

program participants irrespective of any identities they may hold, including their age, sex, gender, sexual orientation, nationality, ethnic origin, color, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background. We empower all children, program participants, and encourage them to fulfil their potential, while challenging discrimination, inequality, and exclusion. The best interests of vulnerable people are paramount and shall be the primary consideration in our decision making, with their views being given due weight.

Participation: Operation Smile works for children, young persons, and adults, and with their communities throughout the world, striving for a society that respects human rights and the rights of children. We believe that participation of program participants entails their active, informed, voluntary and meaningful involvement in decision-making that affects them and their communities. Operation Smile commits to offer safe environments where children and program participants can exercise their rights; creating spaces where they feel able and willing to speak about abuse, free from abusers and which empowers them to become actors in their own protection without discrimination or shame. Enabling meaningful, safe, and inclusive participation, Operation Smile strives for the participation of children and program participants that is transparent and informative, while being voluntary, respectful, and relevant.

Zero Tolerance for Inaction: Operation Smile has an absolute duty to protect children and program participants from any form of violence, mistreatment, and exploitation. This is of utmost importance, and is non-negotiable, dictating that action is taken on all reports of safeguarding concerns. A zero-tolerance policy indicates that we will take all safeguarding concerns and allegations seriously, and act in a timely and appropriate manner that takes the

best interests of the victim/survivor into account. In cases where investigations are being launched, experienced and qualified professionals will be undertaking them, guided by the safety, rights, needs and wishes of the victim/survivor, while ensuring procedural fairness to all parties. Reporting procedures are available to all staff, visitors, and associates, and while reports can be made anonymously, malicious reports will not be condoned.

Open, transparent, and accountable: Operation Smile believes in creating a safe and inclusive environment where issues of safeguarding and protection are discussed openly and are well understood between children and adults, ensuring that everybody understands how to exercise their rights and how to report any concerns. We promote open lines of communication both internally within the organization and externally with partner organizations to improve awareness and implementation of child protection policies and practices. This Global Policy is developed to ensure the highest standards of professional conduct and personal practice to ensure no harm occurs to children and program participants during their involvement in Operation Smile programs, projects, and initiatives. We therefore commit to a framework to deal openly, consistently, and fairly with safeguarding concerns and allegations of abuse.

Cultural sensitivity: Operation Smile always seeks to work in ways which are culturally sensitive and that respect the diverse nature of the people we work with. We recognize that there are many ways of thinking and taking care of vulnerable people and making sure they are protected. It is acknowledged that protecting these groups of individuals and being culturally sensitive can be a difficult balancing act, especially given the situation in many of the countries where we work. Culture must not be used as an excuse to abuse children, young people, or vulnerable adults. Local staff at Operation Smile Foundations and

Representative Offices are tasked with providing guidance on how to interpret the policy and its application to the local context.

Shared responsibility: Operation Smile commits to informing all staff and program visitors of this policy and ensuring their adherence to it. Everybody has a responsibility to prevent harm, violence, and SHEA. In support of this commitment and in a wider perspective, Operation Smile will strive to work collaboratively with others at the local level to support and strengthen the capacity of partners to prevent and respond to all safeguarding concerns.

We endeavor to ensure that safeguarding is mainstreamed into all we do and all our approaches. Our safeguarding Implementation standards - outlined in *Guidelines for implementing safeguarding policy* - lay down the requirements for ensuring safeguarding measures are embedded in all parts of our operations and interventions.

Roles and Responsibilities

We are striving to create a safe working environment at Operation Smile. i The shared responsibility of complying with this Global Policy is present on all levels.

All staff and program visitors are obliged to:

i. commit and contribute to an environment where children and program participants feel respected, supported, safe, and protected;
ii. never act or behave in a manner that results in violence against a child or program participant or places a child or program participant at risk of violence;
iii. be aware of and adhere to the provisions of this Global Policy;

iv. report any concerns, rumors, suspicions or allegations of harm, violence or SHEA and/or breaches of this Global Policy using the relevant and/or country specific procedures; and

v. Agree, upon orientation, to comply with the Operation Smile *Safeguarding Code of Conduct.*

Managers are obliged to ensure that:

i. program participants and communities with whom we engage, work or are in contact with are made aware of the provisions of this Global Policy and have the confidence and ability to report any incidents occurring against children and/or program participants;

ii. staff, and program visitors are aware of the provisions of this Global Policy that applies to their role or engagement with us; and

iii. they create a management culture that encourages a focus on safeguarding, maintaining an environment that is safe and prevents violence.

Executive Directors are mandated to ensure that:

i. the relevant Operation Smile entity has in place local procedures that are consistent with this Global Policy and with the reporting and responding guidance (forming part of the *Guidelines for implementing safeguarding policy),* which outlines the reporting requirements and the manner in which they are escalated within each Operation Smile entity. The policy and applicable procedures must be made available in local languages and child-friendly formats; and

ii. the relevant Operation Smile entity implements this Global Policy as it applies to their context, the staff and program visitors, and the children and program participants

with whom they engage, as well as the processes, programs, projects, events and activities they undertake.

Partner organizations involved in carrying out our programs, projects and initiatives will be encouraged to safeguard the vulnerable people that they engage with and will adhere to this safeguarding policy.

All Operation Smile entities shall monitor compliance with this Global Policy through the mandatory tracking and auditing of the Safeguarding Code of Conduct. In addition, we will work with and ensure the participation of program participants, staff and program visitors in reviewing, monitoring, and evaluating the implementation of this Global Policy.

This global policy will be reviewed and updated by the Global Human Resources Department at Operation Smile, Inc. every three years, in line with legislative and organizational developments.

Breaches of this Policy

Breaches of this Global Policy will not be tolerated and may result in disciplinary procedures. Referrals may be made to statutory authorities for criminal investigation under the law of the country in which the breach occurred.

The following are grounds for disciplinary action, up to and including termination of the employment or other affiliation with Operation Smile:

a. Failure to follow this Global Policy and its *Guidelines for implementing safeguarding policy*.

b. Inappropriate behavior toward children or program participants.

c. Failing to report a known or suspected safeguarding incident committed by an Operation Smile staff or program visitor.

d. Interference with any investigation or inquiry into a possible policy violation.

e. Retaliatory action against complainants, survivors, or other witnesses.

f. Making an allegation of abuse that one knows to be false.

Any allegation/suspicion of a breach made against a member of staffor program visitor will be dealt with as quickly as possible, in a fair and consistent way that provides effective protection for the victim/survivor and at the same time protects the rights of the person who is the subject of the allegation. Actions may be taken during an investigation stage that are intended to be precautionary and not a disciplinary sanction or an assumption of guilt.

Annex 1: Terms and Definitions[7]

When used in this document:

"**Abuse**" includes all forms of physical or mental violence, injury or violence, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation. Acts of abuse can also take place online through, for example, the web, social media, or mobile phones. It may be an intentional act involving the use of physical force or power, or it may be failing to act to prevent abuse. Abuse consists of anything which individuals, groups, institutions, or organizations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to another person's wellbeing, dignity, survival, and development.

"**Child**" in line with the *United Nations Convention on the Rights of the Child*, and for the purposes of this Global Policy, is defined as any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1).

"**Child Abuse**" all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

[7] The majority of definitions provided here are those used by Plan International in its global policy *Safeguarding Children and Young People*.

"**Complainant**" This is the person making a complaint; it may be the person who experienced what is being reported (the victim/survivor), or it may be another person (a third-party complainant) who becomes aware of an issue and makes the complaint.

" Foundations" are Operation Smile affiliates that operate as separate and distinct legal entities and via a license agreement with OSI. "**Harm**" is any detrimental effect on a child's or program participant's physical, psychological, or emotional wellbeing. Harm may be caused by abuse or exploitation, whether intended or unintended.

"**Investigation**" a process designed to gather information to determine whether wrongdoing occurred and, if so, the person(s) responsible.

"**Operation Smile, Inc.**" (or OSI) is the main legal body of the organization with its Headquarters in the USA.

"**Partner Country**" (or OSP) refers to a separate legal entity that is affiliated with Operation Smile, Inc. via a license or partnership agreement.

"**PSHEA**" stands for Preventing Sexual Harassment, Exploitation and Abuse. It refers to the responsibilities; preventative, responsive and referral measures that we undertake to prevent children and program participants from being subject to sexual harassment, sexual exploitation, and sexual abuse.

"**Program Participant**"

"**Direct Program Participants**" are the people who are the target of and who we know will be immediately affected by one or more program, project, and initiative outputs; irrespective of whether these are delivered directly by Operation Smile or by partners or organizations who are acting on behalf of Operation Smile.

• Direct program participants are individuals who receive materials, equipment; interventions such as training, awareness raising, mentoring or other personal support.

• Direct program participants may be a single member of a household (for example a mother participating in training on nutrition); or it may be all members in the household (for example, parents enrolled in nutrition programs).

"**Indirect Program Participants**" are the people who are not the direct target of the project, but whom we have good reason to expect will derive secondary benefits from the project outputs. These include individuals who:

• Benefit from the increased resources or capacities developed via Operation Smile programs, projects and initiatives. (For example: The children of the parents who received training in nutrition; or the family members who also benefit from improved nutrition; or other clinical patients that benefit from medical education, equipment, supplies or infrastructure enhancements provided by Operation Smile.)

• Benefit from interventions that are aimed at improving the conditions for a community as a whole rather than the individual persons or households. (For example: The people who live in the catchment area of the health clinic that has been improved by the project.)

Program participants can be of any age and include those who we engage with through our programing and influencing interventions.

"**Program Visitor**" refers to a range of persons who are visiting our offices or programs, projects and initiatives and may come into contact with children and young people through an Operation Smile entity. A 'program visitor' may be a journalist, media, researcher, visiting sponsor or celebrity.

"**Representative Offices**" are branches of OSI that conduct programs, projects and initiatives outside of the USA. "**Safeguarding**" is the responsibilities, preventative, responsive and referral measures that we undertake to protect children and program participants, ensuring that no child or program participant is subject to any form of harm because of their association with the organization. This includes, ensuring that their contact with us and/or their participation in our activities, interventions and operations is safe and where there are concerns over a child or program participant's welfare or where a child or program participant has been subject to violence, appropriate and timely actions are taken to address this and incidents are analyzed so as to ensure continued learning for Operation Smile entities.

"**Sexual Abuse**" The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It covers sexual offences, including, but not limited to: attempted rape (which includes attempts to force someone to perform oral sex); and sexual assault (which includes nonconsensual kissing and touching). All sexual activity with someone under the age of consent is considered to be sexual abuse.

"**Sexual Exploitation**" Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.

"**Sexual Harassment**" A person sexually harasses another person if the person makes an unwelcome sexual advance or an unwelcome request for sexual favors or engages in other unwelcome conduct of a sexual nature, or indecently exposes themselves, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

"**SHEA**" stands for sexual harassment, sexual exploitation and sexual abuse.

"**Staff**" refers to individuals who receive a regular salary for work in any Operation Smile entity, as well as individuals paid by or through an Operation Smile entity but located in another entity.

"**Victim/Survivor**" a person who has experienced sexual abuse, exploitation, or harassment. The terms 'victim' and 'survivor' can be used interchangeably. 'Victim' is a term often used in the legal and medical sectors. 'Survivor' is the term generally preferred in the psychological and social support sectors, because it implies resilience. We use both terms as part of our survivor-centered approach and allow those affected by sexual abuse and exploitation to choose the term they prefer. A victim/survivor could be a program participant or a staff member, associate or visitor.

"**Violence**" against a child, young person or adult includes all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation. Acts of violence can also take place online through, for example, the web, social media, or mobile phones. It may be an intentional act involving the use of physical force or power or it may be failing to act to prevent violence against a person.

Violence consists of anything that individuals, groups, institutions or organizations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to the child, young person or adult's wellbeing, dignity, survival, and development.

"**Vulnerability**" refers to a person's ability, which is limited by their social and political identities, to avoid, resist, cope with or recover from violence, exploitation, and abuse.

"**Young People**" in line with United Nations definitions, include individuals – young women, young men, and young persons of other gender identities - aged 15 years to 24 years old. This group spans the categories of 'children', 'young persons' and 'adults' but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

Annex 2: Safeguarding Code of Conduct

Operation Smile is committed to protecting children from abuse and exploitation. All staff have a duty to uphold the principles of the Safeguarding and Child Protection Policy and commit to maintaining a safe environment that prevents violence against children and program participants. Operation Smile will respond to all reports of actual or alleged abuses based on its Safeguarding and Child Protection Policy; irrespective of the nature of the referral, who the allegations are about or who the referrer is, or where s/he is from. This Safeguarding Code of Conduct includes guidance on ethical and proper standards of behavior of adults towards children and young people, and of children/young people towards other children/young people.

As such, it is imperative to:

- Be aware of what constitutes child abuse and exploitation (as detailed in the Safeguarding and Child Protection Policy); understand its provisions; and adhere to the Policy.
- Respect the basic rights of others by facing them fairly, honestly, and tactfully, and by treating people with dignity and respect, regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, color, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, or class.
- Treat all children and young people equally: be inclusive and involve all program participants without discrimination.
- Maintain high standards of personal and professional conduct at all times, providing a positive role model for children and young people.

- Provide an enabling environment for children and young people's personal, physical, social, emotional, moral, and intellectual development, striving to ensure that they are well informed on their safeguarding and protection rights and what to do if they have a concern.
- Know signs of abuse and report and respond to any concerns, suspicions, incidents, or allegations of actual or potential abuse to a child, young person or program participant in accordance with applicable procedures of the Operation Smile entity concerned.
- Respect lines of authority and reporting procedures and cooperate fully and confidentially in any Operation Smile investigation of concerns or allegations of abuse to children and young people.
- Strive to respect the privacy and confidentiality of program participants associated with Operation Smile. This includes never asking for or accepting personal contact details from any child or family associated with our work; never making any contact with a child or young person associated with Operation Smile's work that is not supervised by a member of staff.
- Obtain written consent from the child/young person and parent/carer when photographing, filming, or requesting personal information for program activities, informing them of the specific purpose(s) and intended use of the material. Be careful to ensure that the images are respectful.

Likewise, do not:

- Engage in any action or behavior that could be construed as poor practice or potentially abusive, putting a program participant at risk of harm. Never behave in an inappropriate or sexually provocative manner.

- Engage in any form of sexual activity with anyone under the age of 18, regardless of the age of consent locally.
- Engage young people in any form of sexual activity which involves the exchange of money, employment, goods, or services for sex.
- Discriminate, shame, humiliate, belittle, or degrade children, young people or program participants. This includes anything that may be considered emotional abuse, e.g. using language that mentally or emotionally abuses a child, young person or program participant.
- Use physical punishment/ discipline or physical force towards children, young people or program participants.
- Be alone with a child/young person in any circumstances that might be questioned by others.
- Kiss, hug, fondle, rub or touch a child in an inappropriate or culturally insensitive way; e.g. do not initiate physical contact, such as holding hands.
- Do not perform activities for children that they can do themselves, including dressing, bathing, and grooming.

The above is not an exhaustive list. Staff and program visitors should consider all related actions and behaviors that may compromise the rights and safeguarding of children, young people and program participants.

Note that personal conduct outside work or engagement with Operation Smile is not considered irrelevant. Actions taken out of working hours seen to contradict this policy will be considered a violation.

Annex 3: Guidelines for Implementing Safeguarding in Practice

These guidelines lay out the requirements for safeguarding and protecting children and program participants. These guidelines are especially applicable to staff who interact directly with program participants including children, young persons and vulnerable adults. They also apply to those working on projects, programs, processes, activities and initiatives that impact children and program participants. We also expect organizations funded by Operation Smile to develop context-specific guidelines based on the nature of their activities and the risk such activities pose to the security of children and program participants.

The following guidelines ought to be applied to children and/or program participants when appropriate:

1. Prevention: the organisation will strive to take appropriate steps to assess and manage child and/or program participant safeguarding and PSHEA risk factors and act to prevent any kind of violence before it happens. Prevention measures can include the development of organization safeguarding and PHSEA policies, codes of conduct and associated procedures; the management of risks related to its operations, activities, interventions; and the promotion of child and/or program participant-friendly safeguarding and PSHEA information and resources.
2. Code of Conduct: It is the obligation of all staff, program participants, and visitors to avoid behavior that can compromise the safety and protection of children and/or program participants in its programs, projects, initiatives, activities and operations. Furthermore, as part of their policies and practice documents, organizations have to develop guidance on expected and acceptable behavior for children and/or program participants toward each other.

3. Gender Equality and Non-Discrimination: The organization is required to ensure that all safeguarding and PSHEA policies and procedures take into account gender equality and nondiscrimination requirements. The policies and procedures need to take into account the reality that boys, girls, young women, young men and children and program participants of different gender identities may face different risks related to their safety and protection and that all children and/or Program participants have an equal right to protection irrespective of age, sex, gender, gender identity, sexual orientation, nationality, ethnicity, color, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socioeconomic or cultural background, or class.
4. Screening Procedures: It is imperative that there be clear and thorough screening procedures for all personnel who will interact with children and/or program participants either directly or indirectly. Each country should have screening procedures that are updated frequently. Screening procedures could include certificate of good conduct, police reference checks or equivalent, verification that applicants are not listed in national registries of sex offenders; a detailed application and interview process; references who support the applicant's suitability to work with children and/or program participants.
5. Capacity Building: It is imperative that the organization develop and implement capabilities of all staff who interact with children and/or program participants to appropriately prevent, detect, report, and respond to safeguarding and PSHEA concerns. Organizational policies and practices should be disseminated, understood, and implemented through mandatory inductions and ongoing training courses for all staff.

6. Awareness: The organization must ensure that all staff, engaging with programs are aware of safeguarding and PSHEA risks, policies and procedures; and their safeguarding and PSHEA responsibilities. In addition, children and/or program participants engaged, and caregivers should be informed of the same so that they know what behaviors to expect and how to report concerns.
7. Participation of Children and/or Program Participants: Organizations should ensure that children and/or program participants are actively, meaningfully, and ethically engaged in the development and implementation of safeguarding and PSHEA context specific PSHEA measures; ensuring that they are listened to, taken seriously and their views adequately considered.
8. Reporting Mechanisms for Children and/or Program Participants and Staff: The organization needs to put in place mechanisms to allow the reporting of concerns related to safeguarding and SHEA concerns. This should ensure the appropriate escalation of concerns within the organization and the referral to appropriate authorities and confidentiality. These reporting mechanisms should be accessible, friendly, and sensitive to the needs of children and/or program participants. Children, program participants, and communities should be involved in the development of reporting mechanisms.
9. Response and Follow-up: It is also crucial that policies and procedures developed include appropriate measures to support and protect the ability of children and/or program participants to raise concerns. These measures must consider the best interests of the children and program participants including being sensitive to differing gender and other identities. This will ensure that no further harm befalls the child/program participant because of actions taken by the organization. All concerns

reported must be written up and information kept in accordance with privacy and confidentiality policies of the organization and/or local legislation. The organization must also inform Operation Smile of concerns raised in alignment with policies and procedures.

10. Implementation, Monitoring and Review: The organization should review the implementation of the Safeguarding and Protection Policy every three years or whenever it is determined to be necessary.
11. Sanction and Discipline of Organization Personnel: To avoid further potential harm, there must be appropriate sanctions and disciplinary measures in the organization policies and procedures. For example, immediate suspension of personnel until when allegations are followed up and either substantiated or refuted and/or where personnel is convicted of abusing a child or program participant, the said personnel is immediately terminated with cause from his or her position.
12. Informed Consent: Children (or caregivers) and program participants must be given enough information with details to be able to make informed decisions about their participation in programs, projects, and initiatives including voice recordings, video, or photographs of children and/or program participants. Such information should clearly state how this data will be used. Only after consent is sought and obtained should participation and usage of information be allowed.
13. Protection of Personal Information: All personal information about children and/or program participants should be treated as confidential. Clear procedures should be established designating responsibilities within the organization for accessing and using data with appropriate authorizations, in accordance with Local and Global Data Privacy frames. Data should not be disclosed to any third party, except in accordance

with the policies of the organization or applicable local laws. Examples of personal information include, but is not limited to, any information that can be linked to or used to identify a child or program participant.

14. Working with Partners: When working in partnership, the organization should ensure that adequate safeguarding and PSHEA assessments are made, as part of its due diligence processes. Third party entities that are contracted or supported to work with children and program participants must be subject to the same safeguarding and PSHEA principles and approach outlined in the organization's policies and procedures. Vendors, suppliers, and program participants must also be subject to appropriate safeguarding and PSHEA measures.

/Kathleen S Hogan
CEO / President
Operation Smile

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