



Child Safeguarding Policy and Procedures

Approved by Dr. Kristie Druzca CEO and founder of Includovate	Date 8/26/2025
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Version Control

Date	Version Name	Notes
September 2021	Original Policy	
November 2023	Amended Version 1	Policy restructured, Incident reporting template added
August 2025	Amended Version 2	Policy principles details added, Risk assessment and reporting procedures updated, Photo and video consent forms added.



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Introduction

Includovate is a global, multidisciplinary social enterprise dedicated to empowering women and girls, marginalised communities, and other excluded groups. As a feminist research incubator, we strive to transform the social, political, economic, and environmental systems perpetuating inequalities through inclusive feminist research, social policy, institutional strengthening, systems analysis, and partnerships.

Includovate places human dignity at the centre of its work. It is committed to the meaningful, fair, and full participation of girls and boys of all ages, in all their diversity, in all decisions that may concern or affect children and to the removal of barriers to participation for children with disabilities, girls who are married, pregnant, or mothers, and children who are traditionally marginalised or excluded.

Includovate recognises its duty of care to protect girls and boys of all ages, in all their diversity, from harm and to ensure that all children are treated with dignity and respect. The need for this Child Safeguarding Policy flows from recognising that our work often puts Includovate staff in positions of power about the communities in which we operate. Communities trust that the people representing Includovate will professionally conduct themselves at all times and not engage in behaviour contrary to the dignity, safety or well-being of anyone with whom they come into contact—especially children.

Includovate takes seriously the responsibility to promote child-safe practices and to protect children from harm, including all forms of violence, neglect, exploitation and abuse. We take positive action to prevent people who pose a threat to children from becoming involved in Includovate in any way and take strict measures against any Includovate staff member (employee, contractor or subcontractor) who harms a child. In addition, Includovate proactively designs and implements research projects taking into account child safeguarding principles. Our decisions and actions in response to child protection concerns will be guided by the principle of 'the best interests of the child'. This policy is mandatory for all Includovate employees, contractors and subcontractors.

Includovate's CEO is responsible for creating the managerial environment that enables and facilitates the implementation of all aspects of this policy. The CEO is also responsible for developing and implementing local procedures and delegating responsibility to key posts, including the Managing Director of any Includovate entity, the Chief Operations Officer, the Compliance Director, and/ or the People and Culture Division.



Purpose

This policy defines Includovate's commitment to safeguarding children from harm and sets out how Includovate will actively prevent and respond to incidents of child exploitation and abuse. It aims to create an open and aware organisational culture that allows those who witness, become aware of, or are affected by child exploitation and abuse to raise concerns and report incidents with the assurance that their concerns will be handled sensitively and appropriately. This policy protects Includovate employees, contractors, and subcontractors by establishing clear behaviour standards.

Scope of this policy and procedure

The policy and procedures guideline applies to all Includovate employees, contractors, and subcontractors (collectively referred to as Includovate Staff):

- Employees at all levels, international or national, permanent, temporary full-time, part-time
- Casual employees and Contractors working with Includovate on either a short or long-term basis
- Sub-contractors
- Consultants and advisors
- Visitors (researchers, journalists, media, etc.) who may come in contact with children through Includovate.

All Includovate Staff must agree to the Child Safeguarding Policy and sign the Code of Conduct before the commencement of their engagement.

Policy Principles

The following principles underpin the implementation of the Child Safeguarding Policy and Procedures:

Principle 1: Includovate recognises children as human beings and upholds all of their rights as articulated in international and regional human rights conventions

Includovate is guided in all of our work by the human rights guaranteed to children as human beings in all international and regional human rights conventions, including the United Nations International Covenant of Civil and Political Rights (1976) and the United Nations International Covenant on Economic, Social and Cultural Rights (1976); and in particular the United Nations Convention on the Rights of the Child (1989), the Convention on the Elimination of All Forms of Discrimination against Women (1979) and the Convention on the Rights of Persons with Disabilities (2006). Includovate actively promotes the right of children to be protected from all forms of violence, neglect, exploitation and abuse, including sexual exploitation and abuse. In all actions concerning children, the child's best interests shall be a primary consideration.

Principle 2: Zero tolerance for violence, neglect, exploitation and abuse against children

Includovate has a zero-tolerance approach for all forms of violence, neglect, exploitation and abuse against children, including negligence that results in harm to a child. This



includes, but is not limited to, physical, emotional and psychological violence and abuse; economic exploitation and child labour; sexual exploitation and sexual abuse; child marriage; the trafficking or sale of children; or any other form of exploitation harmful to the child’s welfare; neglect; negligence (indifference to safety or environmental risks or hazards); or any other form of maltreatment.

Includovate will not knowingly engage anyone, directly or indirectly, in any capacity, who poses a risk to children and will work to minimise the risks of child violence, neglect, exploitation and abuse associated with its functions and programs.

Principle 3: Violence, neglect, exploitation and abuse against children are acts of gross misconduct

Violence, neglect, exploitation and abuse against children by any Includovate staff member constitute acts of gross misconduct. Such acts are reportable criminal offences and grounds for termination of employment and/or contract, and/or other punitive measures.

Principle 4: Meaningful participation

Few issues in this world do not, in some way, affect or concern children, yet rarely are their views sought and paid heed to. However, children are a source of wisdom. They have a unique body of knowledge about their lives, needs and concerns, and ideas and views derived from their direct experiences. In conformity with UNCRC Article 12: Right to be heard, when children’s views are solicited and given due weight by their age, maturity and evolving capacities, decisions at every level enhance the protection, promotion and fulfilment of children’s human rights; concurrently, children’s communities benefit from more inclusive, democratic processes.

Includovate is committed to the meaningful, fair and full participation of girls and boys of all ages, in all their diversity, and to the removal of barriers to participation to facilitate this – including for children with disabilities, for girls who are married, pregnant or mothers; and for children who are traditionally marginalised or excluded.

In all activities with children, Includovate will follow the Nine Basic Requirements for Effective and Ethical Children’s Participation.¹ This means that children are given information about their right to participate in a child-friendly, disability-accessible format, explaining why they have been allowed to participate, the scope of their participation and the impact that they will be able to have on decision-making. It also means that children have sufficient time to consider whether they wish to participate and that their participation is based on their free, informed and ongoing consent.

To ensure that children’s participation is not purely extractive, Includovate is committed to conveying feedback and/or following-up to children who participate in research activities so they can see how their aggregated views have been interpreted and used, how they have influenced any outcomes, and what opportunities there are for them to be involved in follow up processes and activities.

¹ See Nine Basic Requirements for Effective and Ethical Children’s Participation, drawn from the UN Committee on the Rights of the Child (2011). [General Comment No.12. The Right of the Child to be Heard](#), UN Doc. CRC/C/GC/12, 20 July 2011, para 120



Principle 5: Awareness raising

Includovate recognises that much of the violence perpetrated against children goes unchallenged both because certain forms of harmful behaviour are understood by children as accepted practices and due to the lack of safe, accessible, confidential, child-friendly reporting mechanisms.² In the course of our work, Includovate will inform all children about their right to be heard, the standards of behaviour they should expect from Includovate staff and associated personnel, where, how and to whom child safeguarding concerns may be reported, and what happens once a child safeguarding report is received.

Includovate will give due weight to the wishes of any child who reports or discloses a child protection concern based on their age, maturity, and evolving capacities and guided by the principle of survivor-centredness. The best interests of the child shall be a primary consideration.

Principle 6: Open and accountable

Includovate will operate openly and transparently, creating an environment where child protection concerns can be raised and discussed and inappropriate behaviour ‘called out’ and addressed. We will hold ourselves accountable for our commitment to protect children by regularly reviewing and strengthening our child protection measures.

Principle 7: Child safeguarding risks and impacts will be continuously assessed and managed

While it is not possible to eliminate the risk of violence, neglect, exploitation and abuse against children, Includovate will actively work to identify, mitigate, manage and reduce the risks to children that may be associated with Includovate functions and programmes. When a risk is assessed as “high” and cannot be reduced or effectively mitigated, the action will not proceed.

Principle 8: Procedural fairness

Includovate will apply procedural fairness when making decisions that affect a person’s rights or interests. Includovate employees, contractors and subcontractors are expected to adhere to this principle when responding to concerns or allegations of child exploitation and abuse.

Risk Management

All research involving children will undergo either Includovate’s internal or national ethical review process depending on the client’s requirements and any national ethical review board clearance as required under the national law of the country where the research is taking place.

Additionally, [safeguarding risk assessments](#) will be conducted before any activities or initiatives involving children to identify potential safeguarding risks and develop measures

² UN Committee on the Rights of the Child (2011). [General Comment No.12. The Right of the Child to be Heard](#), UN Doc. CRC/C/GC/12, 20 July 2011, para 120



to mitigate them.

All Includovate Project Managers and Researchers must undergo training in child safeguarding (Agora training by UNICEF). They are expected to remain alert at all times to potential risks to children and to actively prevent and mitigate all risks of harm to children.

Staff Recruitment and Selection

Includovate is committed to child-safe recruitment, selection, and screening practices. Includovate will not knowingly engage anyone—directly or indirectly—who poses a risk to children. These practices aim to recruit the safest and most suitable people to work in our programs. Includovate's child-safe recruitment practices include:

- Recruitment processes for all staff, contractors and sub-contractors must include comprehensive checks to assess their compatibility with the values and principles detailed in this Child Safeguarding Policy and their suitability for working with children. These measures may include:
 - Values- and behavioural-based interview questions,
 - Police checks,
 - Working with children checks (if applicable),
 - References from three independent referees. Referees must not be Includovate staff or family members, and at least two of the referees must be from current or former clients/supervisors.
- All applicants are required to provide proof of identity, including birth certificates, passports and evidence of relevant qualifications.
- All Includovate staff, contractors and subcontractors must read and sign this Child Safeguarding Policy and Procedures and the Code of Conduct.
- Includovate reserves the right to refuse employment to and/or terminate the contract of any person it deems poses an unacceptable risk to children.

Staff education and training

Includovate is committed to training staff, contractors, and subcontractors on how to protect children from harm, create child-safe environments, mitigate the risks of harm, and respond to safeguarding violations if harm does occur. All PMs and Researchers must undergo mandatory child safeguarding and PSEA training within one month of their appointment. All locally employed subcontractors must undergo child safeguarding training before engaging in any activities on Includovate's behalf.

Collection and use of children's stories and images

When collecting children's stories, photographing or filming a child, or using children's images or audio recordings for work-related purposes, Includovate staff members and associates must:

- Never photograph or film a child or allow anyone else to unless strictly required for the project.
- Anonymise the child in all stories, photographs, films and audio recordings. This



means:

- Never use children's real names.
 - Never photograph, film or record a child or tell their full story in contexts where their identity may be revealed.
 - Ensuring that identifying landmarks and names of schools, clinics, streets, etc., that could indicate a child's location are not included in stories and audio recordings and are not visible in photographs or films.
 - Always photograph or film children in a way that does not reveal their faces (e.g., from behind).
- Never photograph a child with insecure immigration status, a child who is a survivor of sexual violence, a child who is (an alleged) perpetrator of a serious crime, or a child with a serious health condition that could result in social stigma if revealed.
 - Obtain free, full and ongoing informed and documented consent from the child *and* his/her parents or guardian before photography/filming/audio recording. This requires explaining where, why and how the story, photograph/film or audio recording will be used and ensuring that the child and his/her parents or guardian understand that they may withdraw consent while photographing/filming/audio recording is underway and after it has concluded.
 - Ensure photographs, films and audio recordings present children in a dignified and respectful manner and not in a vulnerable, sexual or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
 - Ensure recordings and images are honest representations of the context and the facts.
 - When sending or publishing images electronically, ensure file labels, metadata, or text descriptions do not reveal identifying information about a child.
 - Before photographing or filming a child, ensure that local customs, traditions, or restrictions on reproducing personal stories, images, and sounds are adhered to.

Staff use of social media

Includovate firmly commits to upholding its feminist safeguarding principles in its use of social media. Consent to collect and use children's stories and images is granted to Includovate, not individual staff.

Includovate staff are prohibited from collecting stories, photos, or videos of children for personal use and from posting project-related stories, photos, or videos of children on their accounts. Staff should never upload or post any racist, defamatory, obscene, or abusive content.

Staff contact with children and their families

Includovate staff is prohibited from requesting or accepting the personal contact details of children and their family members associated with Includovate projects for personal purposes. They are also prohibited from maintaining relationships with these children and



their family members outside of the project engagement.

Online safety

Includovate might need to engage with children online. It is important to highlight that abuse can also happen online, across any device that is connected to the web, like computers, tablets, and mobile phones on social media, via text messages and messaging apps, emails, online chats, online gaming, and live-streaming sites. All contact with children outside project engagement, including the above-mentioned online contact, is strictly prohibited.

All staff and associates must maintain professional and child-friendly conduct at all times during virtual interviews. Children should be interviewed in the presence of a parent, guardian, or appropriate adult whenever possible. Only approved, secure, and encrypted platforms should be used for virtual communication. These platforms must comply with data protection standards and safeguard children's privacy.

No interviews or online interactions with children are to be audio or video recorded without explicit, informed consent from both the child (where appropriate) and their parent or guardian. All permissions must be documented and stored securely.

Data management and protection

Includovate uploads documents to a secure password-protected Google Drive folder, which allows access only to a strict number of authorised individuals.

Includovate also implements a confidential data storage process. We shall keep the data confidential and anonymise all the personally identifiable information of the respondents to ensure that no information can be traced back to them but that we will generalise information without referencing the respondents. Confidentiality will be ensured by assigning anonymous codes or pseudonyms to all interviewees. Children's full names and other identifiable information will not be shared or published. Findings from the study will not be associated with the names of individual participants. As such, the names of participants will not be used when revealing findings, attributing quotes or for any other purpose in any reports or presentations.

“Sensitive personal data will be retained only as long as necessary and disposed of securely following applicable privacy laws.”

Child labour

Includovate acknowledges that in the course of our work, representatives may encounter children (aged between 5-17 years) engaged in labour activities that do not accord with the minimum age standards expressed in the International Labour Organisation's Fundamental Principles on Rights at Work.³ Includovate opposes such practices and

³ See [Global Estimates of Child Labour](#)



prohibits using child labour within its own business and in that of its suppliers and contractors. Any staff member, contractor, or partner who **witnesses or becomes aware** of child labour (especially hazardous or forced labour) **must report** the incident immediately following the reporting procedures outlined below. While some forms of child work may be legally permissible (e.g., light work appropriate to age and development), all personnel are expected to remain vigilant about potential child labour concerns and, in case of doubts, seek advice from the Safeguarding Committee Chair.

Reporting child safeguarding concerns

Includovate will take all concerns and reports of child abuse seriously. We will immediately investigate and act on these reports with the highest priority. **Includovate staff are not to take action or make decisions on a course of action independently.**

Who should report?

All Includovate employees, contractors, subcontractors, consultants, advisors and visitors **must report** child safeguarding concerns, incidents and allegations, and any other concerns regarding the safety, health or welfare of children involved with Includovate programmes. This includes actual or suspected harm to a child, both intentional and unintentional, as well as potential risks of harm to a child.

Includovate has zero tolerance for child safeguarding violations. Failure to report a child safeguarding concern, incident or allegation will be considered a breach of this Child Safeguarding Policy. Includovate personnel who knowingly fail to report a child safeguarding concern, incident or allegation will be subject to disciplinary action, including termination of employment or engagement with Includovate.

Children, parents, community members and partner organisations can also report child safeguarding concerns, incidents and allegations. Concerns can be reported via the [Includovate website](#). There is also a specific child-friendly complaint procedure available on Includovate website which would also allow recording audio messages for children.

Includovate is committed to maintaining a child-friendly complaint-handling process. This includes taking any disclosure of abuse from a child seriously. Only the Safeguarding Committee Chairperson will have access to the complaints and will apply strict confidentiality when handling or referring to them.

What should be reported?

All Includovate employees, contractors, subcontractors, consultants, advisors and visitors must report child safeguarding concerns, along with any other concerns regarding the safety, health or welfare of (a) children involved with Includovate programmes and (b) children in the broader community with whom Includovate personnel come into contact.

All reports, disclosures and allegations received from a child, parent, community member, employee, contractor, subcontractor, consultant, advisor, visit or other stakeholder regarding a child's safety, health or welfare must be reported. This includes actual or suspected harm to a child, both intentional and unintentional, as well as potential risks of



harm to a child.

All observations of concerning behaviour exhibited by an Includovate employee, contractor, subcontractor, consultant, advisor or visitor, whether Includovate worker or other agency worker, that breaches the Includovate Code of Conduct must also be reported; *inter alia*: violence, neglect, exploitation and abuse against a child, negligence (indifference to safety or environmental risks or hazards) or any other form of maltreatment toward a child. **The child harmed does not need to be an Includovate programme participant.**

All safeguarding risks should be reported, as they could indicate that safeguarding violations are occurring or may occur in the future. This includes unsafe systems and practices.

Suppose Includovate staff member(s) witness any child safeguarding violations during a visit to a partner organisation or contractor. In that case, they must report this to the Safeguarding Committee Chairperson.

Who should you report to?

All concerns should be reported directly to the Safeguarding Committee Chairperson (hr@includovate.com). **Includovate staff are not to take action or make decisions on a course of action independently.**

A reporting function on the Includovate website can also be used to report concerns anonymously, and there is a child-friendly reporting procedure.

The Safeguarding Committee Chairperson will lodge the report with the appropriate client body or refer to another organisation if required.

How can reports be made?

Reports should be made in writing by completing the Includovate's **Incident Reporting Template** in Annex C of this policy or by reporting anonymously via the Includovate website. Reports should be as factual as possible and include specifics such as time and date, nature of concern and reason for reporting, and details of persons involved.

When must reports be made?

Child safeguarding concerns must be reported immediately and no later than 24 hours after the concern arises.

What will happen next?

The Safeguarding Committee Chairperson may consult the scope of the incident with other members of the Safeguarding Committee and refer the issue to the client, another organisation, an external safeguarding advisor or legal counsel. They may also undertake a risk assessment to determine whether the incident can be referred to local authorities without causing further harm to the child. In countries where there is doubt about their integrity and/or competence and/or where reporting may lead to reprisal or re-victimisation for the child or their family, all potential risks should be assessed before



any actions are taken.

The Safeguarding Committee Chairperson and members are responsible for recording incidents, concerns, and referrals and securely storing them so that information remains confidential. Such files will be retained separately from others in a password-protected Google Drive.

Whistleblower protection and protection from retaliation

Includovate will not tolerate any form of coercion, intimidation, reprisal or retaliation against any Includovate staff member who reports breaches of this Child Safeguarding Policy or provides any information or other assistance in an investigation. The Includovate Whistleblowing Policy will also apply in this regard.

This policy will be reviewed every two years by the Safeguarding Committee and updated as needed. The Legal head/ Operations head will lead the review process.

References

The policy was developed after consulting the following documents:

- Australian Government: Department of Foreign Affairs Child Protection Policy, 2017
<https://www.dfat.gov.au/about-us/publications/pages/child-protection-policy>
- United Nations Convention on the Rights of the Child
<https://www.unicef.org.au/our-work/information-for-children/un-convention-on-the-rights-of-the-child>
- Australian Council for International Development (ACFID) Guidelines for the Development of a Child Safeguarding Policy, ACFID code of conduct., 2018
https://acfid.asn.au/sites/site.acfid/files/resource_document/ACFID%20Code%20of%20Conduct%20Guidelines%20for%20the%20Development%20of%20a%20Child%20Safeguarding%20Policy_Nov%202018.pdf
- Plan International Child Protection Policy 2013
https://plan-international.org/sites/files/plan/field/field_document/annex_b.pdf
- FRIDA Safeguarding Policy
- ActionAid Child Protection Policy and Procedures
- Save the Children: Safeguarding victim/survivor-centred protocol
https://www.savethechildren.org.uk/content/dam/gb/reports/policy/safeguarding_survivors_protocol.pdf



Annex A: Definitions

CHILD: Every human being below the age of eighteen years.

CHILD ABUSE: All physical, emotional, psychological and sexual acts perpetrated or threatened against the child—including the deliberate or wilful failure to protect the child from harm—that take place in a relationship of responsibility, trust or power and that result in or have the potential to result in negative effects upon the child’s safety, wellbeing, dignity or development.⁴

CHILD EXPLOITATION: When an individual **in a position of power and/or trust** takes or attempts to take advantage of a child for their own personal benefit, advantage, gratification or profit. This personal benefit may take different forms: sexual pleasure, cheap labour, dispensable soldiers, drug runners. Exploitation often occurs in the context of exchange of value, involving payment in cash or in-kind (e.g., access to opportunities, goods or services; residency papers; freedom of movement; social status or political power) to the child or a third person/s (e.g., the child’s family or traffickers). Child exploitation can also occur in non-commercial contexts within the family – for example, child marriage and ‘bride price’ (sale for marriage), which exemplify traditional forms of sexual exploitation. A perpetrator of child exploitation is any person who facilitates, recruits, transports, transfers, harbours, receives or uses a child for the purpose of exploiting that child.⁵

CHILD, VIOLENCE AGAINST: Encompasses all physical, sexual, emotional or psychological acts that involve the intentional use of power or verbal or physical force, threatened or actual, against a child that either results in or has a high likelihood of resulting in actual or potential harm to the child’s, wellbeing, dignity or development. Possible forms of harm include injury; death; disability; decreased psychological, psychosocial or mental health; or maldevelopment.⁶

CHILD NEGLECT: The intentional or unintentional failure of an individual **with clear responsibility – by custom or by law – for the child's well-being** to protect that child from actual or potential harm to their safety, wellbeing, dignity and development. This includes but is not limited to, *physical neglect* (failure to protect a child from harm); *medical neglect* (failure to seek timely and appropriate medical care for a serious physical or mental health problem); *supervisory neglect* (failure to provide safe and appropriate adult supervision that—in light of a child’s age, development, or situation; the duration and frequency of the unsupervised time; and the environment in which a child is left unsupervised—places the child at risk of harm). An act may be categorised as neglectful, depending on whether or not harm to the child is intended.⁷

⁴ The Alliance for Child Protection in Humanitarian Action (2019). [Discussion Paper: Review of Existing Definitions and Explanations of Abuse, Neglect, Exploitation and Violence against Children](#)

⁵ The Alliance for Child Protection in Humanitarian Action (2019). [Discussion Paper: Review of Existing Definitions and Explanations of Abuse, Neglect, Exploitation and Violence against Children](#)

⁶ The Alliance for Child Protection in Humanitarian Action (2019). [Discussion Paper: Review of Existing Definitions and Explanations of Abuse, Neglect, Exploitation and Violence against Children](#)

⁷ The Alliance for Child Protection in Humanitarian Action (2019). [Discussion Paper: Review of Existing Definitions and Explanations of Abuse, Neglect, Exploitation and Violence against Children](#)



CHILD PROTECTION: The set of policies, procedures and practices that we employ to ensure that Includovate is a child-safe organisation in which the children we work with or come into contact with are safe and protected from both intentional and unintentional harm and that we respond appropriately to individual cases of abuse and exploitation (either internal or external to the Company) if they occur.

CHILD PARTICIPATION: The right of every child to be heard and the obligation of adults to engage children (individually and/or collectively) with opportunities to form and express their views and to influence matters that concern them directly and indirectly. Meaningful participation involves a transfer of power from adults to children, transforming the status of children from passive recipients to active agents who are informed and able to influence the decisions that affect their lives. Child participation is an ongoing process, which includes information-sharing and dialogue between children and adults based on mutual respect. It is also a process in which children can learn how their views and those of adults are taken into account and shape the outcome of such processes. It demands that full consideration of children's views is given, taking into account their age, maturity and evolving capacities.⁸

CHILD PORNOGRAPHY: Any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes.

DIRECT CONTACT WITH CHILDREN: Being in the physical presence of a child or children in the context of Includovate's work, whether contact is occasional or regular, short- or long-term.

INDIRECT CONTACT WITH CHILDREN: Having access to information on children in the context of Includovate's work, such as children's names, locations (addresses of individuals or projects), photographs and case studies.

INFORMED CONSENT: A procedure through which potential research participants are given sufficient research-related information (including when, where and why the research is taking place, possible risks and benefits, and how the information they provide will be used) in an accessible manner, taking into account their age, maturity, evolving capacities, disabilities and language requirements, and, having affirmed that they understand this information, voluntarily agree to participate in said research. Informed consent is continuous and may be declined or withdrawn at any time without penalty.

SEXUAL ABUSE: Sexual abuse involves forcing or persuading a child to take part in sexual activities, not necessarily involving a high level of violence. The child may not be aware of what is happening. It covers a continuum from:

Non-contact forms of harm, including genital exposure, having a child pose or perform in a sexual manner or exposing them to sexually explicit material or acts (including pornographic material), grooming of a child (and possibly those around them) in

⁸ UN Committee on the Rights of the Child (2011). [General Comment No.12. The Right of the Child to be Heard](#), UN Doc. CRC/C/GC/12, 20 July 2001, para 3; UNICEF (2017). [Child Participation in Local Governance: A UNICEF Guidance Note](#).



preparation for abuse, communication of graphic sexual matters (including by email and SMS); to

A range of contact behaviours, such as kissing, touching or sexually fondling the child, penetration of the vagina or anus either by digital, penile or any other object, or coercing the child to perform any such act on themselves or anyone else.

SENIOR MANAGEMENT TEAM: means the CEO, Managing Director of any Includovate Entity, the Chief Operations Officer or any Director.

STAFF MEMBER: Anyone Includovate engages to carry out work on its behalf. This includes employees, contractors, subcontractors, interns, volunteers, consultants, advisers and anyone else engaged by Includovate.



Annex B: Code of Conduct

This Child Safeguarding Code of Conduct sets out how Includovate employees, contractors, and subcontractors should behave to protect children from intentional or unintentional harm, including all forms of violence, neglect, exploitation and abuse and to protect themselves and Includovate from allegations of wrongdoing. **This is not an exhaustive or exclusive list. Staff should always conduct themselves—and be seen to conduct themselves—in a manner consistent with their role as a representative of Includovate and as a positive role model for children.**

When working with children, Includovate staff must do everything they can to create and maintain an environment that prevents harm to children and promotes the implementation of this Code of Conduct. This includes the following requirements.

As a staff member of Includovate, I will:

- Respect all children and treat them equitably regardless of their gender, race, religious or political beliefs, age, physical or mental health, sexual orientation, family and social background, cultural, economic and immigration status, criminal background, or that of their parents or caregivers.
- Comply with all international and regional child protection laws, norms and standards, including those relating to child labour. Further guidance on Child Labour is provided above.
- Participate in any Safeguarding training as requested by Includovate,
- Ensure two or more adults supervise all activities that involve children. Adults must remain visible and present at all times.
- Avoid any physical contact with children.
- Seek informed consent from the child and their parent or guardian before taking photographs or videos of a child. Further guidance on requirements for photographing children is provided in the Photography section below.
- Use positive, non-violent methods to manage children's behaviour.
- Accept responsibility for personal behaviour and actions, including accountability for their response to a child's behaviour.
- Be aware of situations that may present a risk and actively manage these through planning and adequate organisation.
- Listen to and respect children's views, encouraging them to share their opinions and concerns.
- Ensure all interactions are safe, appropriate, child-friendly and sensitive to the child's feelings. This includes ensuring that language is moderated and refraining from adult comments that may cause discomfort.
- Encourage children to provide feedback on their experiences with Includovate staff members and partners.
- Be vigilant for signs that a child may have been trafficked or is at risk of trafficking.
- Familiarise themselves with reporting procedures and report any child protection concerns immediately, following this Child Safeguarding Policy and Procedures.
- Monitor the implementation of the policy and procedures regularly. Participate in child safeguarding training and capacity building as provided by Includovate.



As a staff member of Includovate, I will NOT:

- Behave in any way that places a child at risk of harm.
- Act in ways intended to shame, humiliate, belittle or degrade a child, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment, or favour particular children to the exclusion of others.
- Hit or otherwise physically assault, harm or abuse children.
- Work alone with a child or have physical contact with a child.
- Develop physical/sexual relationships with children or involve children in any form of sexual activity, including paying for sexual services.
- Develop relationships with children that could in any way be deemed exploitative or abusive.
- Use language, make suggestions or offer inappropriate, offensive or abusive advice.
- Behave verbally or physically in a manner that is inappropriate or sexually provocative.
- Have a child with whom you work and stay overnight at personal accommodation.
- Seek ways to contact any child outside of the program times (for example, via social media).
- Do things for a child of a personal nature that they can do for themselves, such as assistance with toileting or changing clothes.
- Condone, or participate in, the behaviour of a child that is illegal, unsafe or abusive.
- Give or provide children with alcohol or illegal drugs.
- Take or use photographs, videos or other images of children for personal use or uses that are not directly work-related.
- Hire children in any form of child labour (including as “house help”).
- View, download, distribute or create indecent or inappropriate images of children and pornography.
- Do not allow allegations made by children or concerns expressed by others about their welfare to go unrecorded or unacted upon.

Photography and use of a child’s image

In addition to the above behaviour standards, when photographing or filming a child or using children’s images for work-related purposes, I will:

- Never photograph a child in contexts where their identity may be revealed.
- Never photograph a child with insecure immigration status.
- Obtain informed and documented consent of the child and his/her parents or guardian before photography/filming (a photography consent form is in Annex D to this policy). This includes allowing a child and his/her parents or guardian to decline to appear in the photograph/film.
- Provide an explanation of how the photograph/film will be used.
- Ensure photographs, films, videos and DVDs present children 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.
- When sending or publishing images electronically, ensure file labels, metadata, or text descriptions do not reveal identifying information about a child.
- Ensure the local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child.



This Code of Conduct forms part of staff contracts with Includovate. Failure to adhere to it could result in your engagement with Includovate being terminated and/or criminal prosecution.

Declaration:

I, [insert full name] confirm that I have been provided with a copy of, and have read, understand and agree to abide by Includovate Pty Ltd Child Safeguarding Policy and Procedures.

I also declare that:

- I am not married to anyone below the age of 18 years old;
- I have never had a finding of guilt against me in any legal proceedings for charges related to child abuse;
- I am not the subject of any ongoing legal proceedings related to allegations of child abuse against me, and
- To the best of my knowledge, I am unaware of any legal investigation, whether criminal or civil, into alleged child abuse or exploitation allegedly committed by me.

I understand that Includovate reserves the right to take formal action against me if I breach the Includovate Child Safeguarding Policy and Procedures and the Code of Conduct or any other local or international child protection laws.

Signature:

Name:

Date:

*** This signed Declaration will be held on file for the duration of your engagement with Includovate*



Annex C: Child protection incident reporting template

Please use the following template to report concerns of child abuse, exploitation or harm. Please be as factual as possible, including specific information (e.g. time and date, names of people involved, including others who might have observed/witnessed the incident) wherever possible.

Part One: About reporting person

Your name:
Your role in relationship to Includovate:
Details of any other organisation involved:
Your relationship to the child or children concerned:

Part Two: About the Child/Children

Name(s):
Gender:
Age:
Address:
Who does the child live with?
Where is the child now?
Are there any immediate medical issues?
Have these been addressed?
Are there any immediate safety issues?
Have these been addressed?

Part Three: About the Alleged Perpetrator(s)

Name(s):
Gender:
Age:
Race/Ethnicity and hair colour:
Identifying marks/tattoos/piercings:
Identifying clothing/cap/lanyard:

Part Four: Have you informed parents/guardians or reported to any other staff or organisations?



If yes:
Time and date of reporting:
Person(s) to whom report was made:
Advice given:
Action taken:

Please send a copy of this completed form to:

hr@includovate.com



Annex D: Photo and video consent form example

Introduction

Includovate is a research firm currently contracted to conduct (name of the project and client).

We request your permission and consent to mention you and/ or use your image, video, or quotes on our website, printed publications, in public events/exhibitions and speaking engagements in connection with the above mentioned project. The images and video from this Project will be kept confidential. We follow the GDPR standards for the transfer, storage, and use of data. Your consent will allow us (the “Data Controllers”) to use and subsequently process your personal data as part of the Project and only with the purposes of the Project.

You do not have to give consent or complete this form and you can withdraw your consent at any time. If you have any questions, please ask a member of our team.

Consent

I hereby consent to Includovate without expectation of compensation or other remuneration to mention me, use my image, video and/ or quoting me in a printed publication, in public events/exhibitions and speaking engagements, and/or on their website and to be used now or in the future for the purpose of external communications, including advertising and marketing as well as posted on Social Media account(s).

I acknowledge that Includovate owns all copyright to materials featuring me. I understand that my image and my story will be stored safely in Includovate’s records. This document shall have no bearing on the ownership of any copyrights in these materials between Includovate and any Third Party. I understand I can withdraw the above consent at any time by advising Includovate in writing via email to info@includovate.com.

I have read and understand this notice, and consent to the collection, use and disclosure of my image, including disclosure to overseas recipients, as outlined.

We prefer to use real names, but if you prefer not to, we will use a pseudonym (fake name) instead. Please tick here if you would prefer a pseudonym.

This consent is given in perpetuity, and does not require prior approval by me.

Name:

Signature/ Thumbprint:

Date:

Location:



Name of parent/legal guardian in case of minor:

