


World Vision China Foundation Limited Child and Adult Safeguarding Policy	 World Vision
Approved by World Vision China Foundation Limited Board Meeting	
Effective date: 1 July 2019	

CHILD AND ADULT SAFEGUARDING POLICY
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PREAMBLE	<p>World Vision China Foundation Limited (WV China), as a child focused development and humanitarian organization, commits itself to the promotion of child well-being in a safe environment. Safeguarding the children and vulnerable adults we serve is foundational to all WV China activities and programmes. Central to everything we do is our commitment to first do no harm to children and adult beneficiaries, to respect the rights of all beneficiaries, and to uphold the best interests of the children as a primary consideration in all actions and decisions. WV China has zero tolerance towards incidents of violence or abuse against children and adults including sexual exploitation or abuse, committed either by employees or others affiliated with our work.</p> <p>WV China takes necessary actions to respond to any suspected or known instances of abuse. Incident responses are centred on the child or adult survivor, prioritizing their interests. WV China is committed to continuous improvement of safeguarding efforts which emphasizes prevention of sexual exploitation and abuse and other forms of violence or harm. We abhor any misuse of power, status, or trusted position for any sexual or other exploitative purposes. We endeavor to tackle this root cause of abuse in our prevention and training efforts</p> <p>With reference to the United Nations Conventions on the Rights of the Child, the Partnership Management Policy on Child and Adult Safeguarding as approved by Executive Leadership Team in August 2018 and related national legislation, this Child and Adult Safeguarding Policy was therefore developed.</p> <p>This Child and Adult Safeguarding Policy (This Policy) is intended to:</p> <ul style="list-style-type: none"> - Ensure that children and adult are respected and treated equal when participating WV China activities. They are fully informed of the activities and acknowledged that they have the rights to participation, instead of compromising their rights in exchange of assistance or participation that are already due to them; - Protect children and adult from any forms of violence (especially Sexual Exploitation and Abuse, SEA), and prevention of harm as a result of inappropriate behavior or non-ethnic practices; - Promote the realization of rights entitled to children and adult beneficiaries through safeguarding practices; - Align with local laws and policies. WV China shall first understand and leverage on the existing child protection systems and resources as developed in the community, and to promote collaborative efforts; - Ensure that children are an active participant in family and community and acknowledge their potentials in responding to incidents, including violence incidents. WV China is committed to enhance the resiliency of children while implementing this policy. <p>This Policy is subjected to review at least every three years as according to the Partnership Management Policy on Child and Adult Safeguarding. The review includes participation of children, parents, and other vulnerable adults.</p>
Scope	WV China's Child and Adult Safeguarding Policy (This Policy) applies to all WV offices

	<p>and projects in China. All WV China staff, interns, volunteers, Board members, partners, all independent contractors whose contracted responsibilities are expected to include interaction with or access to children & adult beneficiary or their data, should acknowledge in writing the receipt, understanding and abide by This Policy. Signed agreements are kept on file. They are required to report any suspicious incidents of child or adult safeguarding using WV China’s reporting mechanism. Failure to adhere to This Policy is grounded for disciplinary action, up to and including termination of employment relationship or collaboration contract.</p> <p>This policy is focused on protecting all children anywhere from harm caused by WV China employees and affiliates, and protecting adults from harm caused by WV China employees or affiliates as part of WV’s programme presence.</p> <p>This policy applies equally in emergency relief and development aid programmes.</p>
<p>Definition</p>	<p>Beneficiary: In regards to safeguarding, WV China uses a broad, working definition of ‘beneficiary’ to include not only direct beneficiaries of a particular project, but also any child or adult who might suffer harm caused by WV employees or affiliates as part of WV programme presence.</p> <p>Child: Any person below the age of 18. This Policy covers interactions by WV employees and affiliates with all children anywhere (not only beneficiaries).</p> <p>Child protection: All measures taken to prevent and respond to abuse, neglect, exploitation and all other forms of violence against children. This is a World Vision global sector, together with child participation.</p> <p>Safeguarding: Preventing, reporting, and responding to harm or abuse of adult beneficiaries and any children by WV China employees and affiliates. Externally to WV China, there is often no distinction made between child and adult safeguarding.</p> <ul style="list-style-type: none"> • Child safeguarding: Preventing, reporting, and responding to harm, abuse or exploitation of any child (< age 18) by a WV China employee or affiliate. This Policy also requires reporting or referring child abuse cases affecting any child in WV programmes, even if not committed by WV employees or affiliates. • Adult safeguarding: Preventing, reporting, and responding to harm, abuse or exploitation of an adult beneficiary (age 18+) by a WV China employee or affiliate. Includes Prevention of Sexual Exploitation and Abuse (PSEA), a frequently cited subset of safeguarding. <p>Sexual Exploitation and Abuse (SEA): The term “sexual exploitation” means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. The term “sexual abuse” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.</p> <p>Prevention of Sexual Exploitation and Abuse (PSEA): A term used by the United Nations and International Non-Governmental Organization community to refer to measures taken to protect vulnerable people from sexual exploitation and abuse by humanitarian aid workers.</p> <p>Volunteer: A person who is neither employed by WV China nor legally obliged to work for WV China, but who on free will and without expectation of payment or other remuneration, contributes their time, skill, knowledge, efforts and expertise to WV China’s work. This Policy is applied to all volunteers, except volunteers for whom the following apply:</p>

	<ol style="list-style-type: none"> 1. The volunteer does not have physical contact with sponsored children or their records as part of their volunteer activities; AND 2. Beyond basic training, WV China does not specify how to complete the relevant activities; AND 3. The community does not perceive or consider this person as ‘part of WV China’s work’ due to their volunteer activities, and if they were to harm a child or adult, would not be expected to hold WV China responsible. <p>WV China employees and affiliates: Refers to the full range of people accountable to WV China’s Safeguarding policies and protocols, including all employees, interns, volunteers, Board member, as well as external parties, including visitors, community volunteers, contractors, partners, and others affiliated with partners or contractors.</p>
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CHILD AND ADULT SAFEGUARDING POLICY	
I. Safeguarding Policies and Responsibilities	<p>I. Safeguarding Policies and Responsibilities</p> <p><u>1.1 Relevant WV People and Affiliates:</u> WV China equips all employees, interns, volunteers, and Board members to understand and perform their safeguarding responsibilities and obligations. WV China also applies appropriate standards to external parties, including visitors, contractors, partners, and others affiliated with partners or contractors, to address safeguarding risks related to their engagement with WV China’s work.</p> <p><u>1.2 Awareness and training:</u> All WV China employees, interns, volunteers, Board members, partners and contractors whom may have access to children or adult beneficiaries in WV programmes, or may have access to personal data about such children or adult beneficiaries, should sign an acknowledgement that they know, understand and will follow this Safeguarding Management Policy or local Safeguarding Policy.</p> <p>They receive safeguarding training at the start of employment or WV affiliation. WV employees and volunteers receive periodic refresher or other safeguarding training at least once every two years thereafter.</p> <p><u>1.2 Agreements with Partner Organizations and Contractors:</u> Partner: A partner organization, for safeguarding purposes, is a Non-Governmental Organization, Community-Based Organization, for-profit enterprise, or other entity implementing a programme or activity on WV China’s behalf or in collaboration with WV China, and which has a written agreement with WV China.</p> <p>Contractor: WV China regularly contracts with non-employee individuals and organizations to perform services for WV. These non-employee individuals and organizations may also be referred to as ‘independent contractors’, ‘consultants,’ or ‘vendors’, and are referred to in this document as ‘Contractors’. Contractors are distinguished from organizations with which WV partners to carry out programme activity.</p> <ol style="list-style-type: none"> a. Agreements with Partner Organizations: the agreement (whether referred to as an ‘agreement’, ‘subgrant’, ‘Memorandum Of Understanding’, or any other terms), should include the content in 1.2c and also specify that before the partner begins any work on the project, the partner’s safeguarding policy and procedures must be provided to WV China and approved by WV China as appropriate for the programme at issue. Alternatively, the partner can

	<p>agree to follow WV China’s Child and Adult Safeguarding Policy in carrying out the programme activities.</p> <p>b. Agreements with Contractors: Contractors engaged in situations where they - or their employees or subcontractors - may have access to children or adult beneficiaries in WV China programmes, or may have access to personal data about such children or adult beneficiaries, require the safeguarding language in 1.2c in their contract with WV China. These requirements apply whether the Contractor is being paid for the services, or is providing them for free (‘pro bono’), and is irrespective of the duration of the contract.</p> <p>c. “In the course of performing this contract, Partner or Contractor and their employees will ensure that:</p> <ol style="list-style-type: none"> 1. Any of their interactions with children or with adult beneficiaries, or with personal data about such persons, will comply with the Safeguarding Behaviour Protocols in This Policy, and with any other reasonable safeguarding measures that WV may specify; 2. Any incidents of harm or risk of harm to children or to adult beneficiaries will be reported immediately to WV China; 3. Any individuals with access to children or adult beneficiaries, or to personal data about such persons, have to sign and declare that they did not commit any crime against children or sexual exploitation or abuse against an adult; and 4. These safeguarding obligations will be clearly communicated to, and acknowledged by, all employees who may have access to children or to adult beneficiaries, or to personal data about such persons, and will be extended in identical form to any subcontractors (if any are authorized) engaged to perform this contract.’ <p>d. In addition, a copy of the Safeguarding Behaviour Protocols This Policy must be attached to the agreement with partner organizations or contractors.◦</p> <p><u>1.4</u> Safeguarding Staffing: WV China appoints a Child and Adult Safeguarding Focal Point to support the implementation of This Policy. A “Safeguarding Working Group” is formed to monitor the implementation of and review this policy. It is also responsible for managing Child and Adult Safeguarding Incidents. The basic members are: the National Director (ND), Operations Director (OD), Director of Integrated Ministry Quality, Director of Strategic Management & Support and the Child and Adult Safeguarding Focal Point.</p>
<p>2. Behaviour Protocols</p>	<p>2. Behaviour Protocols</p> <p>2.1 Child and Adult Safeguarding Behaviour Protocols: WV China employees and affiliates behave in ways that protect children and adult beneficiaries, prevent sexual exploitation and abuse, and prevent any other intentional or unintentional harm to the people WV China serves or works amongst. Rules of behaviour are based on local and culturally appropriate interactions (provided these meet or exceed the minimum protocols below) with children, members of the opposite sex, and other vulnerable adults. All WV China employees and affiliates abide by these protocols in their activities with WV, for all children anywhere and for all adult beneficiaries.</p> <p>Acceptable Behaviour – WV employees and affiliates:</p> <ol style="list-style-type: none"> a. create and maintain an environment which prevents sexual exploitation and abuse of children and adult beneficiaries and promotes the implementation of these Behaviour Protocols; b. are careful about perception and appearance in their language, actions and relationships with children and vulnerable beneficiaries. Their behaviour - including in person and on digital platforms, both online and offline - demonstrates a respect for children and adult beneficiaries and their rights;

- c. ensure that all physical and online contact with children and beneficiaries is appropriate in the local culture;
- d. use positive, non-violent methods to manage children’s behaviour;
- e. accept responsibility for personal behaviour and actions as a representative of the organization;
- f. are always accountable for their response to a child’s behaviour, even if a child behaves in a sexually inappropriate manner; adults avoid being placed in a compromising or vulnerable position with children;
- g. where possible and practical, follow the ‘two-adult’ rule while conducting WV China’s work, wherein two or more adults supervise all activities that involve children, and are visible and present at all times;
- h. comply with safeguarding related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation;
- i. comply with applicable data privacy laws and with relevant WV China data privacy and information security policies, including WV digital child safeguarding protocols, when handling any personal data about individual children or adult beneficiaries, noting in general that collecting or using such data must be limited to the minimum necessary, and that such data must be maintained and transferred in a secure, confidential manner;
- j. immediately report through established reporting mechanisms any known or suspected safeguarding incident or breach of this Policy by a WV China employee or affiliate, or a humanitarian aid worker from any other agency.

Unacceptable Behaviour – WV employees and affiliates do not:

- a. behave in an inappropriate physical manner, marry a child, or develop a sexual relationship with a child (under 18 years old), regardless of the country specific legal age of consent or age of majority. This also includes consenting or condoning the above behavior);
- b. develop or seek a sexual relationship with any beneficiary of any age; such relationships are not acceptable and will not be tolerated since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of WV’s humanitarian aid or development work;
- c. sexually exploit or abuse any beneficiaries (adult or child); such behaviour constitutes an act of gross misconduct;
- d. exchange money, employment, goods, or services for sex (including sexual favours, other forms of humiliating, degrading, or exploitative behaviour, or hiring sex workers) or other exploitative demands is strictly prohibited. This includes exchange of assistance that is already due to beneficiaries;
- e. fondle, hold, kiss, hug or touch children or adult beneficiaries in an inappropriate or culturally insensitive way;
- f. use language, make suggestions or offer advice to a child or adult beneficiary which is inappropriate or abusive, including language that causes shame or humiliation, or is belittling or degrading;
- g. spend excessive or unnecessary time alone with a child or adult beneficiary, away from others or behind closed doors or in a secluded area;
- h. condone or participate in behaviour with children or adult beneficiaries which is illegal, unsafe or abusive; including harmful traditional practices, spiritual or ritualistic abuse;
- i. hire children in any form of child labour (including as “house help”) (‘Child labour’ is work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling.);
- j. hit or use other corporal punishment against a child while the child is in WV care or the WV China employee or affiliate is conducting WV work;

	<ul style="list-style-type: none"> k. take a child alone in a vehicle for WV China work, unless it is absolutely necessary, and with parental/guardian and managerial consent; l. misuse or be careless with personal data about individual children or adult beneficiaries; m. communicate with a child in WV China's program areas through digital platforms (e.g. Weixin, Weibo, Facebook, Twitter), via mobile technology (e.g. texting, Whatsapp, Skype), or online without consent and knowledge of his/her parents. Further, WV employees or affiliates never communicate on mobile, digital or online platforms with children or adult beneficiaries in ways that are inappropriate or sexual; n. stay silent, cover up, or enable any known or suspected safeguarding incident or breach of this Policy by a WV China employee or affiliate. <p>2.2 Disciplinary Action: the following cases are grounds for discipline, up to and including termination of the employment or other collaboration with WV:</p> <ul style="list-style-type: none"> a. Failure to follow Safeguarding Behaviour Protocols of This Policy; b. failure to follow any other part of This Policy; c. other inappropriate behaviour toward children or adult beneficiaries; d. failing to report a known or suspected safeguarding incident committed by a WV China employee or affiliate.
<p>3. Recruitment</p>	<p>3. Recruitment</p> <p>3.1 Screening: WV China takes diligent measures to screen out all people who might seek to use WVV to harm children or adult beneficiaries, or whose past actions indicate an unacceptable risk of such harm. These measures include addressing safeguarding in job advertisements, applications, interviews and references. Safeguarding screening measures are applied to all candidates for employment, Board members, volunteers, interns and individual contractors who will have access to children or adult beneficiaries or to their personal data. During the interview process, applicants are asked about previous work with children. For references supplied by applicants, questions are asked regarding the suitability of the candidate to work with vulnerable adults and children or for a child-focused agency. Documentation of references is kept on file.</p> <p>Note that major grant donors may have specific screening requirements for work they fund, so relevant grant terms and regulations should be checked.</p> <p>3.2 Identity and Background Checks: People with a prior conviction for any crime against children or sexual exploitation or abuse against an adult are not hired or engaged by WV China, to the extent permitted by applicable law. Candidates for employment, Board members, volunteers, and interns - as well as relevant personnel of contractors and partners - have an identification check and an appropriate criminal record or police background check, to the extent permitted by law, prior to employment or engagement with WV China, and periodically thereafter as required by law or appropriate for the context. In China, such practices could be applied in some places, but yet to be consistently applicable across the country. WV China developed alternatives to police background checks and had been granted formal approval by Global Center (Approval was obtained by 4th Sept 2018 and will be valid for 5 years).</p> <p>3.3 Staff recruitment:</p> <ul style="list-style-type: none"> a. Safeguarding measures (such as background check) will be shown in job advertisement and applicants are required to support the process when needed;

- b. Provide declaration in the application form that they do not commit any crime against children and abuse or exploitation against adult, nor have been accused of it.
- c. During the interview process, applicants are asked about previous experience in child and adult safeguarding, and documented in the interview report.
- d. Approved alternative measures on police background check:
WV China people hired or affiliated from Hong Kong:
 - Will provide three written references: a personal / church reference and two written professional references from previous employer in lieu of police / government issued record of conduct. References will ask questions about the suitability of the candidate to work with children, and if there are any concern that WV China should have about this person working in a child-focused agency. These reference check will be kept in their personal files.
 - For hiring HK new employees whose jobs are required to have direct contact with children, will apply the Sexual Conviction Record Check.
 China recruited WV China people – all employees, Board members, interns, independent contractors and partners: Reference check with the potential candidates' previous employers or clients by phone or by email if they meet the following criteria:
 - Position at Hay 12 or above; or
 - Position is related to programme management (i.e. AP or project employees) or requires to have a close connection with the community and children; or specific position such as CS, CIM, HEA, HR and Audit etc.; or
 - If P&C have any doubts about the information provided by the candidate.
- e. Sign a self-declaration that they have not committed crimes against children or sexual exploitation or abuse against an adult, nor have been accused of it. They should provide self-declaration upon commencement of employment.
- f. Receive periodic refresher or other safeguarding training at least once every two years thereafter.
- g. Relevant background will be carried out for all expatriate staff as applicable in their county.

3.4 Volunteers:

- a. Provide declaration in the application form that they do not commit any crime against children or sexual exploitation or abuse against an adult, nor have been accused of it, and they agree to provide necessary information in case of background check.
- b. A signed statement from a local authority (for example village / commune chief) regarding the “suitability of this person to work with children” and stating that the authority has “no knowledge of any record of abuse of children by volunteer.
- c. At least two additional verbal or written references – with at least one from a local Community Based Organization (CBO), school or other organization or institution that works with children.
- d. Sign a self-declaration that they have not committed crimes against children or sexual exploitation or abuse against an adult, nor have been accused of it. They should provide self-declaration upon commencement of service.
- e. Receive periodic refresher or other safeguarding training at least once every two years thereafter.
- f. Relevant background will be carried out for all expatriate volunteers as applicable in their county.

<p>4. Visits to WV Project</p>	<p>4. Visits to WV Project</p> <p>4.1 Visitors: Visitors subject to this Policy include people going to a WV China field programme or meeting with a WV beneficiary child(ren). This includes sponsors, donors, and other delegations from Support Offices, celebrity or media as invited by WV. Government officials or institutional donors (government, multilateral) based in the hosting country do NOT require Safeguarding clearance, but are accompanied by a WV China employee.</p> <p>4.2 Visit Preparation: Visits are pre-approved by both the sending and the hosting offices. Unannounced visits to sponsored children or WV China’s project communities are not permitted. Support Offices are responsible to conduct police background checks on potential sponsor or donor visitors prior to any field visit, where permitted by law.</p> <p>4.3 Visitor Orientation to Safeguarding: WV China is diligent to ensure that visitors uphold the relevant sections of This Policy. The following requirements apply to visitors who visit a project or have direct contact with community members in WV programming areas.</p> <ol style="list-style-type: none"> a. Visitors from other WV offices who are employees or Board Members: The hosting office provides a brief orientation to the Safeguarding Behaviour Protocols of This Policy, as well as local customs regarding adult interaction with children. b. Visitors who are not WV employees or Board Members: All such visitors are briefed on Safeguarding Behaviour Protocols of This Policy (Section 2) and Prevention of Harm in Communications (Section 5) by the sending office prior to the visit. Upon arrival, visitors receive a brief written or oral orientation and sign acknowledgement of receipt of the protocols. The signed acknowledgement is kept on file by the hosting office or department of WV China. Non-employee or Board visitors are accompanied by a WV employee when visiting projects.
<p>5. Communications, Social Media and Digital Technology</p>	<p>5. Communications, Social Media and Digital Technology</p> <p>5.1 Dignity: WV China takes care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a subject, and WV China ensures images are honest representations of the context and the facts. In all forms of communications, children and adult beneficiaries are treated and portrayed with dignity and not as helpless victims or in sexually suggestive poses.</p> <p>5.2 Consent: Children or adult beneficiaries who are primary subjects of text, photo and/or video resource gathering by WV China must provide informed consent. Informed consent means the subject has a general understanding of the purpose of the reporting or photography, and gives verbal or written permission thereof. If the primary subject is a child, written consent is also collected from the parent, guardian, or other legally required entity or individual. In the following situations, written consent is collected from the child and their guardians or adult beneficiary:</p> <ol style="list-style-type: none"> a. child/adult beneficiary could be personally identified or b. the sensitive nature of their personal disclosure or situation could possibly cause damage to their privacy, dignity, safety or reputation, or c. where otherwise required by applicable law. <p>5.3 Digital Awareness: WV China actively supports Registered Children (RCs) and their parents/caregivers—as well as any children participating in WV organized Information and Communication Technology (ICT) activities—to understand how to</p>

	<p>safely and appropriately utilize social media and digital technology, while avoiding risks and appropriately responding to threats or incidents.</p> <p>5.4 Prevention of Harm in Communications: WV China is committed to storytelling that raises awareness of and promotes solutions to ending violence and abuse against children and adult beneficiaries. WV China takes the following steps to prevent harm through communications, social media and digital technology (including photographs/videos/audio clips, stories, articles, or any other communication materials):</p> <ol style="list-style-type: none"> a. Personal child and adult beneficiary information that is captured, stored or sent through electronic, on-line or mobile devices is password protected. In addition, data is handled in accordance with WV China’s current information security standards for personal data, which may include encryption and other requirements. b. Wherever possible, measures are taken to prevent electronic copying of photographs without WV permission (utilizing digital water-marking and right-click disable functions in accordance with the WV Partnership Minimum Standards for Internet Presence). c. Recognizing the special vulnerability of children, material posted on social medial or digital technology does not contain a child’s family name, sponsorship ID number, or child’s personal location/address. d. Material with a child or children is not geo-tagged to precise locations if it contains any part of the child’s name. An acceptable alternative is to retag photos with the child’s first name only to the Area Programme or project office location. e. WV China discourages direct, unfacilitated, undocumented communication through social media without WV China’s knowledge between: a sponsor/donor/visitor and registered/non-registered children and between employees/volunteers/other WV China affiliates and registered/non-registered children. f. WV China provides reporting and response options so that sponsors, donors, visitors, children or their caregivers can report any incident(s) where either party feels uncomfortable or threatened. g. Sponsorship welcome kits, WV China websites, domains and social media platform profile pages contain reporting options for child protection concerns or incidents. <p>5.5 Reporting Communications, Social Media and Digital Technology Policy Violations: All violations of This Policy should be reported as stipulated in Section 6 Safeguarding Incidents and Response Protocols.</p>
<p>6. Safeguarding Incidents and Response Protocols</p>	<p>6. Safeguarding Incidents and Response Protocols</p> <p>6.1 Responding to Safeguarding Incidents: WV China is required to investigate and respond to reports of child or adult beneficiary abuse in WV China programmes in ways which are consistent with local law.</p> <p>6.2 Reporting: All WV China employees and affiliates are responsible and obligated to report any suspicions of child or adult beneficiary abuse (or other safeguarding concerns, including any violations of this Policy) that is connected to WV or its programmes. In addition, any credible concern or suspicion of sexual abuse or exploitation by a humanitarian worker outside WV China is immediately reported.</p> <p>WV China uses three levels of Safeguarding Incidents to determine the approach of response, which is based on the seriousness of the incident and WV China’s role.</p>

6.3 Level 1 Child Protection Community Incidents: Abuse of or harm to a child, in a community where WV has programme operations and that is not committed by WV employees or affiliates, is a Level 1 Incident. Field offices report Level 1 Incidents to the WVI Safeguarding Unit in cases of serious harm that threaten the child victim's survival, safety or development.

Upon knowing the level 1 child protection community incidents, project management shall report to Zonal Manager and Child and Adult Safeguarding Focal Point in a quarterly report. The report shall include information about the level 1 incident(s) and Child and Adult Safeguarding Focal Point is responsible for consolidating the quarterly report and provide recommendation to the Safeguarding Working Group.

WV China had included in their Safeguarding Incident Preparedness Plans specific and practical guidance on responsibilities, actions and limits which are consistent with local law, for local team responses to Level 1 incidents.

6.4 Level 2 Safeguarding Incidents: Level 2 Incidents are defined as any violation of this Policy which puts children or adult beneficiaries in direct risk of potential harm, but where no actual harm is believed to have occurred. WV Entities report Level 2 Incidents to WVI Safeguarding within 24 hours of first notice. Response is implemented by the national entity with oversight by and accountability to the WVI Safeguarding Director and support from the Regional Safeguarding focal point.

6.5 Level 3 Safeguarding Incidents: A Level 3 Incident is an allegation or accusation of harm or abuse to a child or adult beneficiary by a WV employee or affiliate. If a child is involved, two additional types of incidents qualify:

- a. death or serious injury of a child while participating in or at a WV activity or caused directly by a WV-related person, and/or
- b. a road traffic accident involving a WV vehicle or driver affiliated with WV in which a child is injured or killed

WV China report actual or alleged Level 3 Incidents to WVI Safeguarding within 24 hours of first notice. Response is implemented by the WV China with oversight by and accountability to the WVI Safeguarding Director and support from the Regional Safeguarding focal point. Where mandated by applicable law, grant requirements, or agreements with WVI, relevant Support Offices are informed immediately in coordination with WVI Legal.

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

- a. Report to programme manager, zonal manager, department heads, members of Senior Leadership team;
- b. Report to Child and Adult Safeguarding Focal Point
- c. If confidentiality required/preferred, or if the above options are not available for whatever reason: Use WV Integrity and Protection Hotline: <http://worldvision.ethicspoint.com>
- d. Use Confidential Incident Reporting form in WV's Integrated Incident Management (IIM) system (trained reporters only): www.worldvisionincidentreport.ethicspoint.com

6.7 Disclosure: Whilst WV China maintains appropriate confidentiality for individuals in Safeguarding Incidents, WV China may disclose information about incidents, when lawfully permitted, in order to support prosecution of suspected criminal activity, meet donor and regulatory requirements, support learning and accountability, advocate to prevent future incidents, or as required by law.

Information in ongoing investigations of Safeguarding Incidents, and information about past incidents, is shared only with those on a 'need-to-know' basis, as deemed necessary by the national office or regional office or WVI Safeguarding Unit. If it is likely that sensitive information about survivors or about violence against children or

	<p>adults will not be kept confidential, and would put people at risk if accessed by unauthorized parties, such information is not collected.</p> <p>Detailed personal information, in particular health information, is not obtained or maintained by WV China, except for the minimum necessary to ensure WV China handles the matter appropriately. Such personal data is kept strictly confidential and protected in accordance with the applicable data protection and informational security standards.</p> <p>6.8 Reporting to Authorities: WV China shall evaluate reporting safeguarding violations to appropriate legal authorities, assessing any legal obligations to report, as well as the interests of the survivor(s). Besides, WV China shall plan for response action as stipulated by related local laws, and in the best interests of the survivor(s).</p>
<p>7. Programming Considerations for Safeguarding</p>	<p>7. Programming Considerations for Safeguarding</p> <p>7.1 Safeguarding Essentials in Programming: In all programmes across the three Lines of Ministry, WV China seeks to do no harm to children or adult beneficiaries, to keep the interests of community members - especially children - at the center of all activities, and to utilize opportunities to help children be safer within their families and communities. This includes consideration during programme design of local child protection threats and issues, and influencing local actors and groups to be safer organizations for children and adult beneficiaries.</p> <p>In emergency programme designs, humanitarian protection threats are considered in addition to child protection threats.</p> <p>7.2 Community Feedback and Complaints Mechanisms: Children, parents, and other adults are aware of established feedback mechanisms in WV China projects and their right to be safe from abuse and exploitation in WV programmes. Every community-level WV programme:</p> <ol style="list-style-type: none"> a. works with children and adults in the community to help them recognizing inappropriate conduct by WV employees or affiliates, and to develop safe and contextually appropriate community feedback mechanisms by which community members can report both general suggestions and any serious incidents of misconduct by WV China employees or affiliates. b. provides information on how to report child abuse, sexual exploitation and abuse, or other breaches of Behaviour Protocols of This Policy by WV China employees or affiliates. <p>7.3 Institutionalization and Adoption: WV China does not facilitate the adoption of children or support programming within long term institutions in ways that perpetuate the institutionalization of children.</p>
<p>8. Sponsorship</p>	<p>8. Sponsorship</p> <p>8.1 Prevention of Harm in Sponsorship: Sponsorship is implemented in a manner that keeps the safety of children as the top priority. This includes the review of all sponsor correspondence, training of staff and child monitors to recognize and respond to abuse, constructive interaction with parents and children, implementation of child protection programming interventions, the secure handling and storage of personal information, and gathering only the minimum elements of personal information necessary for the programme</p>

	<p>8.2 Responding to Abuse: Sponsorship child monitors promote appropriate follow-up action or referrals if child safeguarding needs are observed or reported, as stipulated in WV China’s Safeguarding Incident Preparedness Plans and consistent with local law.</p>
<p>9. Safe Child Participation</p>	<p>9. Safe Child Participation</p> <p>9.1 Prevention of Harm in Child Participation: WV China works to empower children as citizens and participants in their own well-being, and to minimize any risk of harm or negative consequence resulting from participation in activities promoted by WV China. Child participation programmes and activities are based on context analysis with clearly identified needs and expected results, along with how the project will measure progress towards achievement while mitigating risks through risk assessments.</p> <p>9.2 Ethics: Child participation activities are designed and implemented to adhere to principles and ethics from the UN Convention of the Rights of the Child (UNCRC) which keep the best interests of children as the top priority.</p> <p>9.3 Informed Consent in Child Participation: Child participation activities are voluntary and inclusive (especially of the most vulnerable children), and both children and parents/caregivers make informed decisions regarding participation, including due consideration of the benefits and risks that could be associated with the activity.</p> <p>9.4 Child Travel: When it is in the best interests of children, WV sometimes helps children travel to events, activities or other opportunities. In such cases the parents or caregivers, or other legally required entity or individual, give informed consent prior to the travel. The child’s health, safety, well-being, and meaningful participation are the most important priorities during travel supported by WV. WV does not facilitate visits of children outside of their country to their sponsor.</p>