

Child Protection Policy

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Our Vision & Mission

The International Centre for Missing & Exploited Children (ICMEC) makes the world a safer place for children by eradicating child abduction, sexual abuse, and exploitation so that no child stands alone. We advocate, innovate, train, and collaborate to protect the world's children.

Our Commitment

We believe that all children have a right to live without fear of abduction and free from sexual abuse and exploitation. We believe every child deserves a safe childhood where they are able to grow into healthy and successful adults. Thus we strive to protect children from abduction, sexual abuse, and exploitation, on a global level, by implementing policies and programs to address these issues and improve child protection mechanisms worldwide.

Purpose

While ICMEC does not provide direct services to children or their families, it is nevertheless critical that child protection is integrated and incorporated into our strategy, structures, working practices, and programs.

This Child Protection Policy ("Policy") is meant to describe the responsibility of those working for and with ICMEC to ensure that our actions and programs are in line with international child protection principles while making certain that our actions do not further victimize the children we seek to protect.

Audience

The Policy addresses the protection of children and young people and defines a "child" as anyone under the age of 18 years as defined in Article 1 of the UN Convention on the Rights of the Child (CRC).

The Policy applies to ICMEC employees, interns, volunteers (including members of the Board of Directors), and independent contractors, both in the United States and overseas. It also applies to ICMEC's relationships and partnerships with law enforcement, policymakers, legislators, government officials, civil society representatives, educators, industry partners, and others.

Basis

ICMEC bases its work on the principles enshrined in the UN Convention on the Rights of the Child (CRC), in particular:

- Non-discrimination (Article 2);
- Best interests of the child (Article 3);
- Illicit transfer and non-return of children (Article 11);
- Privacy (Article 16);
- Abuse and neglect (Article 19);
- Refugee children (Article 22);
- Sexual exploitation (Article 34);
- Abduction, sale and traffic (Article 35); and
- Child welfare (Article 39).

ICMEC's work is further guided by the Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography, and the Hague Convention on the Civil Aspects of International Child Abduction.

Some of the key principles we adhere to include:

- The best interests of the child are of the utmost importance;
- All children shall be protected from all forms of discrimination including race, color, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status;
- All people have a responsibility to protect children from all forms of abuse, abandonment, abduction, exploitation, maltreatment, neglect, violence, and discrimination whether physical, material, psychological, or emotional and to support the care and protection of children.

Basis

It is the responsibility of ICMEC to ensure that its staff, practices, and programs do not jeopardize the safety of children in any way. To that end the following measures must be taken:

Recruitment and Employment

Advertisement for Vacancies

Advertisements and announcements for job vacancies should include reference to the Policy and screening process.

Interviews

All job interviews will specifically contain a question relating to the candidate's previous history and suitability of working for a child rights organization.

All offers of employment shall be subject to a minimum of two satisfactory references from previous employers in addition to the results of a background check for criminal charges of violent crimes, or crimes against children.

Background Checks/Screenings

All ICMEC employees must go through a standardized recruitment process including application, interview, reference check, and criminal background screening. The same may be requested of interns, volunteers, and independent contractors, at ICMEC's discretion.

ICMEC reserves the right to conduct background screenings of all ICMEC employees, interns, volunteers, and independent contractors on an ongoing and periodic basis. ICMEC will conduct a background screening at least once every five (5) years.

ICMEC employees, interns, volunteers, and independent contractors shall provide truthful and complete information for screening purposes, including granting written consent to conduct the screening.

Any ICMEC employee, intern, volunteer, or independent contractor who provides incorrect or incomplete information for the background screening may be subject to disciplinary measures up to and including termination.

Orientation and Training

The Policy shall be incorporated into ICMEC's Personnel Policies and Practices Manual, as well as the Procedures and Operations manual.

All ICMEC employees, interns, volunteers, and independent contractors will be fully informed of the Policy to ensure they understand the purpose and content.



Process of Engagement

Partnership agreements and contracts should contain a statement affirming the parties' commitment to the principles of child protection articulated in the Policy. Partnership agreements must include language about proper vetting of employees, including criminal background screenings and sexual offender registry searches.

Partners are responsible for reporting any suspected or known violations of the Policy. Partners will ensure its staff members have been vetted via safe recruiting practices and will consider child safety and safeguarding measures during program development.

In addition, ICMEC encourages organizations with whom we collaborate to develop institutional child protection policies and/or to abide by the requirements outlined here to protect against the victimization and re-victimization of children.

Reporting (External Complaints)

ICMEC employees, interns, volunteers, independent contractors, and partners are expected to report to local or international law enforcement when they are made aware of reports of missing or abducted children, or sexual abuse or exploitation of children through programmatic and other engagement/interactions outside of ICMEC. ICMEC employees, interns, volunteers, and independent contractors in the United States will report via the call center or CyberTipline of the National Center for Missing & Exploited Children (NCMEC) – the mandated agency in the U.S. – any reports received by any means regarding missing or abducted children, and sexual abuse or exploitation of children. Overseas employees, interns, volunteers, and independent contractors should contact local, national, or international law enforcement or other mandated agencies to file a formal complaint as required by law.

In addition, in the course of conducting research, if a website or other materials seem to contain child sexual abuse content, ICMEC employees, interns, volunteers, and independent contractors will immediately report that site to the U.S. CyberTipline or other mandated agency and will not open the link, image, or material. ICMEC's Chief Technology Officer should be informed in order to determine a course of action to ensure the removal of questionable content from ICMEC computers, networks, and servers. If needed, an ICMEC employee, intern, volunteer, or independent contractors may also speak with ICMEC Management or his/her Supervisor for additional support.

Reporting (Internal Complaints)

ICMEC employees, interns, volunteers, and independent contractors shall report suspected or known violations of the Policy within 24-hours of occurrence or upon learning of the violation.

ICMEC employees, interns, volunteers, and independent contractors covered by the Policy may report the concern:

1. to their direct Supervisor;
2. to the Human Resources Representative;
3. to the President/Chief Executive Officer.

The report must include:

- Date, time, and location of the incident;
- Parties involved;
- Nature of incident;
- Relevant actions taken at the time of the report to keep the child(ren) safe; and
- Any immediate help or actions required.

Any Supervisor/Manager who has knowledge of or receives a report of a known or suspected violation of the Policy must report it immediately to local, national, or international law enforcement or other mandated agencies to file a formal complaint as required by law.

Investigations

ICMEC takes very seriously every allegation of a violation of the Policy. ICMEC Management is responsible to ensure all credible allegations are investigated, recorded, and tracked/monitored.

The Supervisor or designee is accountable for conducting investigations, interviewing all involved personnel, and making recommendations that will inform the necessary corrective actions and/or remedial measures. The Supervisor or designee will present the findings of the investigation to ICMEC Management and Human Resources to decide on further steps. During the investigative process, reasonable efforts should be made to contact the caretakers of the child(ren) identified in the report or known to be put at risk of or actually harmed within our programs.

Individuals covered by the Policy must fully cooperate with any investigation or inquiry by ICMEC and preserve all records relating to any alleged violation of the Policy. While confidentiality cannot be guaranteed, the reported concerns will remain confidential to the extent possible.

1. Initial Assessment: Upon receipt of a report, an initial screening will be conducted by the Supervisor or designee. A full account of the matter including dates, times, and facts of the incident(s), any immediate personnel action, and all documentation will be recorded in a confidential written central record. All conversations pertaining to the investigation will be properly documented.
2. Recommendations: Discuss and agree the next steps (verbally and in writing) including disciplinary actions with ICMEC Management (Chief Executive Officer, Vice President(s), and Human Resources Representative). A final report will be completed for all incidents that have been investigated. Reports shall include the findings of the investigation, recommendations for disciplinary or personnel actions, and a statement of action taken.
3. Report to the Authorities: Ensure that the incident has been properly reported to law enforcement or other relevant authorities.

Monitoring and Review

A written central record should be kept of any reports received by ICMEC Management or Supervisors concerning child abuse or sexual misconduct or a missing/abducted child related to staff actions. The written record should be reviewed regularly by senior staff to ensure that any child protection concerns have been handled according to the Policy.

The Policy is to be reviewed every two (2) years by ICMEC Management and ratified by the Board of Directors.

Failure to Comply/Disciplinary Action

All ICMEC employees, interns, volunteers, and independent contractors shall know the steps to take and whom to contact when concerns arise regarding the safety of children. Non-compliance with the Policy shall be taken seriously. In the case of any violation of children's rights by an employee, intern, volunteer, or independent contractor, an internal investigation will be undertaken, and the case shall also be referred to the designated authority and/or social services for further external investigation.

Failure to report a concern, reasonable suspicion or knowledge of violation of the Policy will be treated as a serious infraction and may result in disciplinary action.

Any ICMEC employee, intern, volunteer, or independent contractor who fails to comply with the Policy shall be subject to disciplinary action up to and including termination. Formal reprimand and any other disciplinary action shall be noted in the written central personnel record. Information about substantiated child protection concerns will be conveyed in references.

In the case where a Partner fails to comply with the Policy and endangers the safety of a child(ren), the Partnership Agreement may be terminated.

ICMEC employees, interns, volunteers, and independent contractors who have questions, comments, or concerns about the Policy or a related situation in violation of this or a similar policy should report their concerns to the Human Resources office immediately for review.

Use of Images in Presentations

Any images (whether still or moving) used in presentations shall not contain child sexual abuse material (CSAM), obscenity, adult pornography, or any other content that is deemed offensive or inappropriate by ICMEC.

Any graphic still or moving images that are shown must be sanitized. There is no exception to this rule. Sanitizing an image of CSAM includes completely covering the child's entire face (not just the eye area) with a filled-in square, circle or other object and completely covering the child's chest, stomach, sexual organs, lower back, and buttocks with a filled-in square, circle or other object.

All public presentations to be made by ICMEC employees, interns, volunteers, or independent contractors are subject to internal review by ICMEC Management and/or Supervisors to confirm compliance with the Policy.

Working with Children in Professional Settings

Staff who have incidental contact with children in their work will abide by the ICMEC or partner organization child protection policy, whichever is more restrictive. The taking of photographs is by consent only, and images should be cleared by an institution representative to ensure no children are pictured without their consent.

Adult Communication With or About a Child

It is understood that staff will never seek contact with, personal information about, or correspond with a child as part of their work role unless this is approved as integral to a program and safeguards are in place.

Personal details about a child (children) should never be shared on personal social media accounts (i.e., tagging, sharing full names, birthdays). Personal or physical information that identifies the location of a child should never be shared on a website or in communications (i.e., posting the address of a camp or name of school). Communication about children should be respectful and kept to information that is necessary to provide a safe environment.

Case reviews should be anonymized. Explicit permission should be obtained before case details are used in training and identifying information should be changed. Email correspondence containing case information should be deleted as soon as support has concluded.

Confidentiality and Safe Space Announcements

Presentations and training involving child protection professionals should take care not to trigger survivors of childhood abuse, insofar as it is possible. It is recommended that child protection content should include trigger warnings at the start of a presentation when content is beyond the routine professional experience of the participants. If participant experience varies or is not known, assume a higher level of warning is required. Presentations of challenging content to non-professionals or parents/guardians require the most robust safe space warnings. Warnings may include the following:

- This presentation will include the following: note if the content includes descriptions, obscured images, cases, or sensitive topics.
- We acknowledge there are likely to be survivors or supporters of survivors of abuse among us.
- Talking about abuse can cause strong emotions. Feel free to detach or step away if needed. We will not ask you why you stepped away.
- Only anonymized cases should be shared. If a case is shared by training participants, participants agree to seek explicit permission before repeating the details of the case.
- In cases of participants without professional engagement in child protection (such as parents/guardians), and/or potentially triggering content, it may be necessary to provide a written safe space notice or station someone at the door for late arrivals.

General Data Protection Act (GDPR) Obligations

Although the GDPR contains exceptions to data retention in the event of child safeguarding concerns, such as details of a child protection inquiry, much of the data held by ICMEC will be expected to comply with the data protection regulations of a number of countries. Child protection provisions are found in Articles 6, 8, 12, 40, and 57 of the GDPR. See the website for regulations in full [here](#).

Portal reference: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN>