



Prevention of Sexual Exploitation, Abuse & Harassment (PSEAH) Policy

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Related Policies

- Organisational Code of Conduct
- Complaints Policy & Procedure
- Child Protection Policy & Procedures
- Recruitment Practices (Employee Handbook)
- Sexual Harassment in KOTO's workplace policy.

Introduction

- KOTO's staff, Representatives and Partners operate in a position of trust and are often working with children and other community members who are in less powerful and vulnerable situations. KOTO recognises the serious obligation it holds to do everything possible to respect and protect the children and adults with whom it works. Sexual exploitation and abuse of the very children we aim to protect, or vulnerable adults in communities, are among the most grievous ways that KOTO can fail in its mission. The Child Protection Policy and Procedures sets out expectations, systems and processes aimed at preventing all abuse of children, including sexual exploitation, abuse, and harassment. The Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy sets out the expectations, systems and processes aimed at preventing sexual exploitation of other people we work with such as vulnerable adults and community members, as well as the actions that will ensue if incidents of sexual exploitation, abuse and harassment are identified. The Harassment in this policy relates to people outside the organisation who may be the target of harassment by staff of the organisation.

Policy Statement

- KOTO categorically prohibits, and has zero tolerance for, any actions by all people who work, interact or relate to KOTO's trainees as defined in **section IV** that constitute sexual exploitation, abuse or harassment of children and adults. KOTO Staffs, Representative's and Partners have a strict obligation to take all possible steps to strengthen protection, prevent sexual exploitation and abuse, and to promote the rights of children and other community members with whom we work. If a KOTO Staff, Representative or Partner acts in a way that is sexually exploitative or abusive, immediate steps will be taken to protect and support those affected, and to impose disciplinary action as outlined in this Policy and the related Procedure. Action will include referral to law enforcement agencies, while considering risks to those who have been affected. This Policy should be read in conjunction with the KOTO's Child Protection Policy and related Procedure.

Scope

All Personnels: KOTO Staff, Representatives, Partners, Volunteers, Interns, alumni and all students. Including all suppliers, individuals and organisations with whom KOTO directly enters into an Agreement to deliver its objectives, including but not limited to:

- Suppliers of goods and services.



- Contractors and service providers including consultants, advisers and other directly contracted individuals.
- Other non-Government Organisations (NGO), Civil Society Organisations (CSO).
- Donor partners and stakeholders.
- Researchers

Objectives

This Policy outlines

- What is defined as sexual exploitation, abuse and harassment.
- KOTO's approach to preventing sexual exploitation, abuse and harassment and our commitment to the safety of adults with whom we work.
- KOTO's expectations of Our People.
- The reporting of and the consequences in the case of identified policy breaches. PSEAH Policy – May 2022 Page 4 - 8.
- Definitions People/Person refers to all employees, interns, volunteers, Board members, contractors, consultants, partners, ambassadors, suppliers, and service providers.
- Partners refers to organisations that KOTO works with in the delivery of project or country services.
- Staff refers to permanent or contract employees of KOTO.
- A child is any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.
- Fraternalisation refers to any relationship occurring while conducting KOTO's business, that involves — or appears to involve — partiality, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour. It includes sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations.

Definitions

Partners refers to Contractors, Consultants, Suppliers and Service providers with whom KOTO directly enters into an Agreement to deliver its objectives.

Staff refers to permanent or contract employees of KOTO

Child/Children (sometimes referred to as KOTO's "beneficiaries"). A child is any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.

Fraternalisation refers to any relationship occurring while conducting KOTO business, that involves — or appears to involve — partiality, preferential treatment or improper use of rank or position including but not limited to voluntary sexual behaviour. It includes sexual behaviour not amounting to intercourse, a close and emotional relationship involving public displays of affection or private intimacy and the public expression of intimate relations.

Vulnerable Adults are defined as:

- Those aged over 18 years;
The current Vietnamese Youth Law (Law No. 53/2005/QH11) defines young adults, or youth, as 16 to 30 years old. However, KOTO defines young adults as 18 to 30 years old, to be consistent with the United Nations Convention on the Rights of the Child (UNCRC), which defines a child as "any person under the age of 18 years, regardless of whether a country's laws recognise adulthood earlier" (UNCRC, 1989). Vietnam is a signatory to the



UNCRC. A young adult is deemed to be vulnerable if he or she is, or may be, unable to protect him or herself against significant harm or exploitation.

- This may be due to a combination of:
 1. Personal circumstances or those of their family.
 2. Experiences of trauma.
 3. History of abuse or neglect.
 4. Mental or Physical health.
 5. Barriers to participation including a disability, impairment or some form of discrimination or stigma.
 6. Lack of legal status.
 7. Level of education and development.
 8. Poverty
 9. Religious Identity.
 10. Economic or Social Status.
 11. Sexual Orientation.
 12. Gender.
 13. Ethnicity.

Abuse definitions

Outlined below are specific to the Prevention of Sexual Exploitation, Abuse & Harassment (PSEAH) Policy. In addition to these, the definitions outlined in the Child Protection Policy are also relevant to our understanding and actions of safeguarding and protecting young adults. Abuse happens to males and females of all ages, ethnicities and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion. Abuse includes physical, sexual, emotional, neglect, and exploitation. Abuse can be committed by anyone, including people in a position of trust. Abuse can also be committed by other young adults and children.

Sexual Exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, included but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another (*from the United Nations Secretary General's Bulletin: Special measures for the protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)*).

Sexual Abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (*from the United Nations Secretary General's Bulletin: Special measures for the protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)*).

Sexual Harassment means the unwelcome sexual advance, or an unwelcome request for sexual favours, from one person to another, or the engagement in other unwelcome conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated, or intimidated. Sexual harassment can take various forms. It can be obvious or indirect, physical, or verbal, repeated or one-off and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff and personnel (*from Australian Government Department of Foreign Affairs*



and Trade, Prevention of Sexual Exploitation, Abuse and Harassment Policy, 2019). The sexual harassment of staff and personnel within KOTO is covered in the Workplace Discrimination and Assessment Policy.

Workplace is the business location where the Staff usually undertake work activities, or where they are working remotely undertaking work activities (for example, undertaking a field visit or overseeing a program at a partner's location). This includes working outside usual business hours and any work-related events including conferences and social events either at the usual business location or an external location.

Policy Principles

KOTO adapts and applies the core principles as defined by the UN Secretary-General (ST/SGB/2003/13) and Socialist Republic of Vietnam on Child protection - Children's Law - Law No.102/2016/QH13 National Assembly Socialist Republic of Vietnam

1. Sexual activity with children is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense (further details are in the Child Protection Policy).
2. Exchange of money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behaviour, is prohibited.
3. KOTO staff, Representatives and Partners are typically in a position of power in relation to beneficiaries of assistance/ program participants. Any actual or attempted abuse of this power for sexual purposes is exploitative, undermines the credibility and integrity of the work of KOTO, and is prohibited.
4. Where a KOTO staff, Trainees/Students, Representatives and Partners develops concerns or suspicions regarding Sexual Exploitation, Abuse or Harassment by someone, whether in the same agency or not and whether within KOTO, he or she must immediately report such concerns via established reporting mechanisms (see Child Protection Policy)
5. Preventing Sexual Exploitation, Abuse and Harassment is a shared responsibility. KOTO staffs, Representatives and Partners are obliged to help create and maintain an environment that prevents Sexual Exploitation, Abuse and Harassment. KOTO managers at all levels have a particular responsibility to support and develop systems that maintain this environment.
6. Zero tolerance of inaction of incidents of Sexual Exploitation, Abuse and Harassment is core to KOTO.
7. Sexual Exploitation, Abuse and Harassment by KOTO staff, Representatives and Partners is never acceptable and constitute acts of serious misconduct and are therefore grounds for termination of employment, or professional relationship severing in the case of non-employees and may require referral to law enforcement agencies.

Policy in Action

Reporting incidents or concerns

1. Any KOTO Staff, Trainees, Representatives and Partners having reasonable grounds to suspect that Sexual Exploitation, Abuse or Harassment has occurred is mandated to report the matter immediately (within 24 hours) to their Manager or Executive Team Member. This includes any notifications received from partners and any alleged incidents that pose a significant reputational risk to KOTO. Any KOTO staff, Representatives and Partners requiring advice can contact the KOTO Foundation Director who serves as KOTO PSEAH focal person



2. Community members or any other external person are strongly encouraged to immediately notify a KOTO management if they, or someone they know, is thought to have been the victim/ survivor of Sexual Exploitation, Abuse or Harassment perpetrated by a KOTO staff, Representatives or Partners. Community members or other external persons can notify a concern or incident using any of the following mechanism:
 - For KOTO trainees, meeting in person to report the incidents to any KOTO staff is strongly suggested.
 - For staff, representative, volunteers, meeting in person to report the incidents to line manager or/and board of management
 - For others, referring the following instructions:
 - Inform any KOTO representative at any time in person or via phone, text, email or other communication;
 - Via the contact details contained in KOTO's Complaints procedure or Child Protection policy published in local language.
 - Via KOTO response contact - **Foundation Director** Ms. Hoang Thi Hanh **Mobile:** +84 (0) 904 505 393; **Email:** hanh.hoang@koto.com.au; **Trainee service supervisor** Ms. Ngo Hong Nhung, **Mobile:** +84 (0) 988555608, **Email:** nhung.ngohtihong@koto.com.au; **Medical Care Service's Hotline** Ms. Nguyen Thi Thuy, **Mobile:** +84 (0)9881500108; **Police's Hotline** Mr. Ngo Van Trai, **Mobile:** +84 (0)868239358, **MOLISA (Ministry of Labour, Invalids and Social Affairs) Hotline, Phone:** 02437737493. In the case that the numbers above are unreachable, call the KOTO hotline number at:
3. The process for receiving and managing allegations and concerns under this Policy will be according to KOTO ***Child Protection Policy May, 2022.***
4. The Foundation Director and KOTO Board of Management are responsible for implementing KOTO's Complaints Policy and Procedure and ensuring this is accessible and for reporting any instances of Sexual Exploitation, Abuse and Harassment to local authorities, donors and DFAT within the required timeframes.
5. The Foundations Director is responsible for regularly informing our Staff, Representatives, Partners and communities on measures taken to prevent and respond to Sexual Exploitation, Abuse and Harassment. Such information should be developed and disseminated in the country in cooperation with other relevant agencies (DFAT) and should include details on complaints mechanisms, the status and outcome of investigations in general terms, feedback on actions taken against perpetrators and follow-up measures taken as well as assistance available to complainants and survivors.
6. The Foundation Director is responsible for reporting all incidents arising under this Policy to Board members.
7. The foundation Director is responsible for reporting all incidents arising under this Policy to relevant donors in line with contractual and partnership obligations. Reports of abuse or exploitation of individuals under the age of 18 years must follow KOTO's ***Child Protection Policy May, 2022.***

Investigation Process

If a protection concern happens to a KOTO Trainee in the community (including but not limited to at KOTO offices) and not related to a KOTO staff or associated personnel, an important principle when dealing with the concerns is that the trainee has a right to express their desired outcome. KOTO has a responsibility to advocate for the trainee and to advise them of the courses of action available to them which take into account their safety and wellbeing. All victims of protection concerns should be treated in a sensitive manner, and should be assured that information on their case will be shared on a "need-to-know" basis only. Process to follow is proclaimed in the ***Child Protection Policy May 2022.***



In cases where the allegations involve a staff member or associated personnel, KOTO management is responsible for conducting an investigation and will call on external support if needed. The victim's concerns must always be heard, addressed seriously and they should precede any other claims or evidence in either unofficial or official hearings. The accused too, will have the right to hear the concerns raised against them and respond; this is an important concept called 'due process'. If the incident is reasonably proven to have occurred, and depending on the severity of the breach, disciplinary measures will be taken in line with the Human Resources manual, up to and including dismissal. If the concern is determined to be a criminal matter, it will be referred to the appropriate authorities. Process to follow is proclaimed in the ***Child Protection Policy May, 2022***.

Confidentiality

Instances of Sexual Exploitation, Abuse and Harassment raised under this Policy will be treated confidentially. However, when an incident is identified it may be necessary for those managing the incident to reveal its substance to people such as other KOTO personnel, relevant agencies, external persons involved in the investigation process or law enforcement agencies.

Where there is a reasonable belief that a criminal offense has occurred, the matter will be reported to the appropriate law enforcement agency while considering risks to those who have been affected. When a referral is made to law enforcement, any action by KOTO will be guided by such an agency.

Any decision not to refer to law enforcement requires the approval of the Foundation Director and Board members who will document and record the reasons for the decision. KOTO will take reasonable precautions to store any records or files relating to a matter of Sexual Exploitation, Abuse and Harassment securely and to permit access by authorised persons only. **Unauthorized** disclosure of information relating to a matter will be taken seriously and may result in disciplinary action, which may include dismissal.

Awareness

- KOTO will publish this PSEAH Policy on its websites.
- This policy will be translated into the relevant local languages to ensure it is understood by all our People and the communities we work with.
- Foundation Director and Human Resources are responsible for developing communications materials about PSEAH, expected staff behaviours, and accessible complaints processes for communities in appropriate languages and media.

Risk Assessment & Risk Management

- Management will include in the organisational risk review process, identification of risks relating to PSEAH and actions to mitigate such risks.
- Foundation Director and HR are responsible for undertaking SEAH risk assessment as part of project and program design. PSEAH risks and mitigation are assessed, documented, and monitored throughout the life of a project/program.
- Foundation Director and HR are responsible for ensuring that partner due diligence and/or capacity assessments include an assessment of partner implementation of key safeguarding and risk policies including PSEAH.
- Foundation Director and Human Resources Manager are responsible for ensuring that local complaints mechanisms are developed in consultation with the communities we work with.



- KOTO Board has overall responsibility for all policies including Risk Management and PSEAH Policies. The Foundation Director will provide a quarterly incident report to the Board and relevant agencies of all instances of PSEAH policy and actions taken by management. Should a significant instance occur that may have significant risk to the affected individual or the organisation, this will be directly reported to the Foundation Director, Board and relevant agencies at the earliest opportunity and outside the normal reporting timelines.
- The Board will review the systems and processes every two years to continually strengthen the organisation's approach to the prevention of sexual exploitation, abuse, and harassment.

HR Practices, Training and Investigations

- The Human Resource Manager is responsible for implementing robust recruitment and hiring practices to screen candidates. This includes use of background and criminal reference checks along with targeted and objective reference checking.
- The Human Resources Manager is responsible for including KOTO standards on PSEAH in induction materials and related training courses for KOTO's Staffs, Trainees, Representatives and Partners. Training will be conducted at KOTO offices at every orientation month (first month when they come to KOTO) of new trainees' cohort and new staff commencing, at least every six months.
- The HR manager is responsible for ensuring KOTO's Staff, Trainees, Representatives and Partners know how to report allegations and concerns related to SEAH.
- Foundation Director is responsible for managing organisational investigations of allegations of Sexual Exploitation, Abuse and Harassment when it comes to Trainees and Human Resources Manager are responsible for managing organisational investigations of allegations of Sexual Exploitation, Abuse and Harassment when it happened to staff, volunteers and interens. All investigations will be conducted in a timely and professional manner. An external consultant may be used to support any such investigation.
- KOTO will take swift and appropriate disciplinary action in relation to People who commit acts of Sexual Exploitation, Sexual Abuse and Harassment. This will usually include suspension while investigations are conducted. Substantiated acts of SEAH are regarded as serious misconduct and will result in disciplinary action including dismissal and/or referral to relevant external authorities including referral to law enforcement agencies in the event of suspected criminal action.
- The Foundation Directors and Human Resources will transparently share misconduct information with other organisations who make a request as part of their own due diligence and integrity checks on their people and partners.

Partners

- The Foundation Director and the Human Resources Manager are responsible for ensuring that our Partners are aware of KOTO's expectations regarding this policy and will highlight that any failure on their part to report or take action where Sexual Exploitation, Abuse and Harassment has occurred shall constitute grounds for the termination of any Agreement or PSEAH Policy – May 2022 Page 8 of 8 partnership with KOTO. Contracts and Agreements with Partners will reflect this expectation in compliance with our commitment to PSEAH policy.

Support for survivors and non-retaliation

- KOTO's managers are responsible for taking appropriate action to ensure that retaliatory actions are not taken against the survivor or reporter of PSEAH. KOTO Whistleblowing Policy assists with how to ensure this occurs.



- Wherever possible KOTO will provide or arrange support to survivors of Sexual Exploitation, Abuse and Harassment. This may include assistance with medical/health treatment, counseling, referral, or legal support.

TRAINEE'S BEHAVIORAL EXPECTATIONS

KOTO PSEAH in-house Trainee EXPECTATIONS.

- Sexual activities at KOTO residence is prohibited at ANY time – consensual or otherwise.
- Entering dormitories of the opposite sex is prohibited at any time.
- Engaging in sexual encounters with other trainees for money is strictly prohibited.
- Forcing yourself sexually and violently onto any other student or KOTO's staff, representative or partner in any location at any time is prohibited.
- It is strictly forbidden to perform sex or any other sexual activity on a person under the age of 18 years old, at any time and any location. Mistaking someone's age is not an excuse.
- It is prohibited to blackmail or exploit someone transgression for sex or sexual activities.

Trainees Rights (Know your rights)

- It is prohibited for any Trainee and/or beneficiaries, to request any protection, placement or any other form of assistance in exchange for sex or sexual favours from KOTO staff, representatives, partners and other program participants.
- It is prohibited for any of KOTO's staff, representatives, partners and other participants to request sexual favours from trainees and/or beneficiaries, including children or other vulnerable population in the community in which KOTO operates in return for protection, placement and any form of assistance.
- It is prohibited for any of KOTO's staff, representatives, partners and other participants to engage in any sexual activity with Trainees and beneficiaries. This includes community members where KOTO programs are located and within KOTO residence.
- It is prohibited for any of Trainee and/or beneficiaries to exchange sex, including sexual favours and other exploitative behaviours for money, employment, preferential treatment and goods and services with KOTO staffs, representatives, partners and other program participants.

Trainees and/or beneficiaries found to have breached the above mentioned expectations will face immediate expulsion from the KOTO program and may face criminal charges.

Reporting incidents or concerns

1. Any KOTO trainee and/or beneficiaries suspect that Sexual Exploitation, Abuse or Harassment has occurred or is occurring to themselves or others, is to report the incident to a trusted adult who will be mandated to report the matter immediately (within 24 hours) to their Manager or Executive Team Member. This includes any notifications received from trainees, other trainees and/or beneficiaries.
2. Trainees and/or beneficiaries can contact KOTO directly Via KOTO response contact - **Foundation Director** Ms. Hoang Thi Hanh **Mobile:** +84 (0) 904 505 393; **Email:** hanh.hoang@koto.com.au; **Trainee service supervisor** Ms. Ngo Hong Nhung, **Mobile:** +84 (0) 988555608, **Email:** nhung.ngothihong@koto.com.au; **Medical Care Service's Hotline** Ms. Nguyen Thi Thuy, **Mobile:** +84 (0)9881500108; **Police's Hotline** Mr. Ngo Van Trai, **Mobile:** +84 (0)868239358, **MOLISA (Ministry of Labour, Invalids and Social Affairs) Hotline, Phone:** 02437737493.



3. The process for receiving and managing allegations and concerns under this Policy will be according to KOTO ***Child Protection Policy and Procedure April 2022.***
4. The Foundation Directors and KOTO Board members are responsible for implementing KOTO's Complaints Policy and Procedure and ensuring this is accessible for reporting any instances of Sexual Exploitation, Abuse and Harassment.
5. The Foundations Directors is responsible for regularly informing our Staff, Representatives, Partners and communities on measures taken to prevent and respond to Sexual Exploitation, Abuse and Harassment. Such information should be developed and disseminated in the country in cooperation with other relevant agencies (DFAT) and should include details on complaints mechanisms, the status and outcome of investigations in general terms, feedback on actions taken against perpetrators and follow-up measures taken as well as assistance available to complainants and survivors.
6. The Foundation Director is responsible for reporting all incidents arising under this Policy to Board members.
7. The foundation Director is responsible for reporting all incidents arising under this Policy to relevant donors in line with contractual and partnership obligations. Reports of abuse or exploitation of individuals under the age of 18 years must follow KOTO's ***Child Protection Policy May 2022.***

Support for survivors and non-retaliation

- KOTO's managers are responsible for taking appropriate action to ensure that retaliatory actions are not taken against the survivor or reporter of PSEAH. KOTO Whistleblowing Policy assists with how to ensure this occurs.
- Wherever possible KOTO will provide or arrange support to survivors of Sexual Exploitation, Abuse and Harassment. This may include assistance with medical/health treatment, counseling, referral, or legal support.

I have read and understood the Trainee expected behaviour regarding the Prevention of Sexual Exploit, Assault and Harassment.

Trainee Name: _____

Signature: _____

Date: _____

Residence Location: KOTO, Hanoi, VN _____



Review of This Policy

KOTO's PSEAH Policy is reviewed every 3 years by KOTO Managers and Directors. This review could involve speaking with staff, observing implementation, and comparing the policy to relevant compliance standards. The policy will be reviewed sooner if necessary — for example if there is a significant change in program or country operating context, or if a major breach or alleged breach of the Code of Conduct results in an investigation. This should be an automatic trigger for a quick policy review. In addition, KOTO Management reviews the implementation of this policy each year. The policy can be updated at any time by the Foundation Director and HR, with input from relevant agencies, and all changes must be approved by the Board.

Code of Conduct

The PSEAH Policy provides detail about the expectations of our KOTO's Staff, Representatives and Partners concerning the prevention and reporting of Sexual Exploitation, Abuse and Harassment. The PSEAH Policy is to be utilized in conjunction with KOTO Child Protection Policy when relevant.

KOTO's Staff, Representatives, Trainees and Partners

- Will treat all beneficiaries with respect and not use language or behave towards them in an inappropriate way, harassing, abusing, sexually provocative, demeaning or culturally inappropriate manner.
- Will not exchange money, employment, goods or services, protection, or assistance for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- Will not engage in transactional sex during KOTO related business.
- Non-national staff are prohibited from fraternisation while engaged in KOTO related business.
- Will not participate in or support any form of Sexual Exploitation, Abuse or Harassment activity including, for example, people trafficking, or pornography.
- Will immediately (within 24 hours) report any concerns or suspicions regarding possible violations of this Policy via the defined reporting approach within the Complaints Policy and Procedure, the Whistle-blower Policy and Procedure or in the case of those under 18 years of age, the Child Protection Policy and Procedures. Failure to report such conduct could lead to disciplinary action.
- Will take all reasonable steps commensurate with their role to prevent, oppose and combat all Sexual Exploitation, Abuse and Harassment.
- Will immediately disclose charges, convictions and other outcomes of an offence that relates to Sexual Exploitation, Abuse and Harassment, including those that may be acceptable under traditional law.
- Will always strive to create and maintain an environment that promotes adherence to and implementation of this Policy.

Any substantiated violation of these expectations is regarded as a serious breach of policy and will result in disciplinary action which may include termination for our Staff, interns, volunteers, Board members, contractors, and consultants, and could lead to the cessation of any partnership agreement with our Partners. Criminal behaviour will be reported to law enforcement agencies.

KOTO's 'Code of Conduct' should be read in conjunction with KOTO's Child Protection Policy and PSEAH Policy. All staff, board members, partners, interns and volunteers must read, sign and abide by the Code of Conduct. The Code of Conduct is intended to guide all staff and associated personnel in making ethical decisions and ensuring the protection of



children and young adults at all times (this includes inside and outside of working hours). KOTO's ability to ensure the protection of children and young adults that it works with depends on the commitment and ability of its staff and volunteers to uphold and promote the highest standards of care, best practice, ethical and professional conduct.

All people working with KOTO in any capacity, paid or otherwise, must agree to and abide by the following:

I, _____ am engaging with KOTO Foundation in the position of _____

I have read KOTO's Child Protection Policy and PSEAH Policy. I understand the responsibilities of all people when working with or around the children and young adults at KOTO, and I will abide by this Code of Conduct at all times.

I understand I must always:

- Treat children and young adults with respect regardless of gender, race, colour, language, sexual orientation, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Endeavour to provide an inclusive and safe environment for all children and young adults.
- Avoid circumstances where my behaviours may be misinterpreted as hostile, neglectful or inappropriate to children and young adults.
- Recognise that children and young adults have a right to make their own independent choices and to give or withhold consent to an activity or service.
- Use computers, mobile phones, video cameras, cameras or social media appropriately, and never to exploit or harass children or young adults, or access child exploitation or abuse material through any medium.
- Safeguard and use KOTO information and resources in a responsible manner which will not place children and young adults at any risk of harm.
- Abide by KOTO's confidentiality agreement to ensure the safety and privacy of beneficiaries and their information at all times.
- Uphold the integrity of KOTO by ensuring that my professional and personal conduct is, and is seen to be, of the highest standard at all times.

I understand that it is inappropriate to:

- Spend excessive time alone with children and young adults away from other people.
- Spend time with children and young adults outside of approved KOTO activities or the requirements of my particular role in the organisation.
- Take children and young adults to my home.

I understand I must never:

- Use physical punishment on children and young adults such as smack or hit them.
- Develop intimate or sexual relationships with children and young adults.
- Develop relationships with children and young adults which could in any way be deemed exploitative or abusive.
- Act in ways which may be 'grooming' a child or young adult for abuse, in ways which are abusive or which may place a child or young adult at risk of abuse.
- Use language or behaviour towards children and young adults which is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate.



- Sleep in the same room or bed with a child or young adult, unless absolutely unavoidable, in which case I must inform and receive approval from KOTO Management first.
- Do things for children and young adults of a personal nature which they, themselves, can do independently, for example, dressing and undressing or going to the toilet.
- Condone, or participate in, behaviour of children and young adults which is illegal, abusive or exposes them to danger.
- Act in ways intended to shame, humiliate, belittle or degrade children and young adults.
- Discriminate against, or favour, particular children and young adults to the exclusion of others.
- Hire children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities or which places them at significant risk of injury.
- Hire young adults for domestic or other labour through physical threats, psychological coercion, illegal methods, deception or other coercive means.
- Exert undue influence or coercion over a child or young adult's financial affairs or arrangements or misuse or misappropriate his or her property, possessions or benefits.
- Release or discuss any personal or confidential information about suspected or proven child abuse or young adult abuse cases other than with the designated Child Protection Focal Point, CEO's or as per KOTO's Child Protection Policy.

When photographing or filming a child or using children's images for work-related purposes, I will:

- Be informed and respectful of local traditions or restrictions before photographing or filming a child.
- Obtain informed consent from the child and parent or guardian of the child by explaining the possible uses of the photograph or film, before photographing or filming.
- Ensure photographs, films, and videos present children in a dignified and respectful manner and not in a vulnerable or submissive manner.
- Ensure children are adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels, data or text descriptions do not reveal identifying information about a child when sending images electronically and publishing images in any form.
- Ensure all photos and videos are kept in a secure, password-protected folder or location, accessible only to those with permission to do so.
- Never use photos or film of KOTO's beneficiaries for my personal use, including posting on my personal social media, except when reshaping content from the KOTO social media.

To ensure my commitment to this Code of Conduct, I will:

- Make myself aware of situations that may present risks and manage them accordingly. If I am unsure I will ask my supervisor for support.
- Participate in KOTO's Child Protection and PSEAH policy induction training, and other mandatory training that is provided or organised by KOTO.
- Plan and organise my work and the workplace so as to minimise risks to children and young adults.
- Ensure that, whenever possible, another adult is present when working within the proximity of children.
- Contribute to a culture of openness to enable any issues or concerns to be discussed.



know one, teach one

- Talk to children and young adults about their contact with staff and volunteers, in order to build their skills in protective behaviours and understanding their rights to protection from abuse and harm.
- Encourage and support children and young adults to raise any protection concerns or incidents.
- Comply with all relevant local legislation and international conventions, including labour laws in relation to child labour and forced labour.
- Immediately report any protection concerns or suspicions in accordance with KOTO's Child Protection Policy and PSEAH Policy and associated guidelines.
- Immediately disclose all charges, convictions and other outcomes of an offence which occurred before or occurs during my association with KOTO that relate to exploitation and abuse of children and young adults.
- Ensure photographs, films, and videos present children in a dignified and respectful manner and not in a vulnerable or submissive manner.

I have fully disclosed to KOTO any information that is relevant to an assessment of my suitability to work with or near children and young adults. I understand that the responsibility is on me, as a person associated with KOTO Foundation, to use common sense and avoid actions or behaviours which could be construed as exploitation or abuse of children and young adults. I understand that at all times I can contact KOTO's management to discuss any aspect of the Child Protection Policy and PSEAH Policy that remains unclear.

Name: .

Signature:

Date:

For volunteers/staff who are aged under 18 at the time of application, the co-signature of a parent or guardian is required:

Name of parent/guardian:

Signature:

Date:

Thank you for contributing to the care and protection of children and young adults at KOTO.