# Child Safeguarding Policy

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| **Effective Date** | February 24, 2020 | **Version** | 4.1 | **Version Date** | March 31, 2025 |
| **Responsible Team** | Ethics and Compliance Department | | | | **POLICY** |
| **Supersedes** | Version 4 | | | | |
| **Policy Type** | Tier 1 Policy | | | **Policy Number** | POL-1024 |

## 1. Purpose

1.1. At Prosper Global, we believe all children regardless of their or their parents' age, sex, gender, sexual orientation, race, religion, different capacities, social and economic conditions, political or other opinion, national or social origin, property, birth or other status have a right to be treated with respect and dignity at all times and protected from all forms of harm, abuse, neglect and exploitation. Prosper Global has zero tolerance for any form of abuse of a child (defined as anyone under the age of 18).

1.2. Prosper Global has a special obligation to ensure the safety, well-being and dignity of all children it comes into contact with through its work. This Policy reinforces our commitment to the United Nations (UN) Convention on the Rights of the Child and the best interests of the child. This Policy states Prosper Global's expectations regarding team member conduct with children and what conduct is prohibited. It also states the process and procedures Prosper Global will maintain to ensure that team members uphold these standards and describes how cases of misconduct are identified, reported, and addressed in an appropriate and timely manner.

## 2. Scope and Application

2.1. This Policy applies to Prosper Global (U.S.), Prosper Global (UK), and Prosper Global (NL), including their branches, subsidiaries, and controlled affiliates (together, "**Prosper Global**"); all Board Directors, officers, employees, seconded employees, interns, daily workers, and volunteers (collectively, "**Team Members**"); all subrecipients, partner organizations, contractors, consultants, agents, representatives, and other individuals acting on Prosper Global's behalf or at its direction (collectively, "Partners"); and all visitors to Prosper Global facilities or programs, including photographers, filmmakers, journalists, researchers, current and prospective donors, and other hosted guests ("**Visitors**").

2.2. This Policy applies to the above parties in all locations, at all times, both during and outside of working hours, and applies to current and past conduct.

## 3. Policy Statements

3.1. Prosper Global expects its Team Members, Partners and Visitors to demonstrate integrity, behave ethically at all times, and adhere to the highest standards of accountability and professionalism. Prosper Global has zero tolerance for any conduct which is abusive or exploitative to anyone, particularly children. Prosper Global expects management to fully enforce adherence to these standards. This also includes conduct that could reasonably be perceived as grooming. (see Section 5 - Definitions and Acronyms for details on what conduct would qualify under these terms).

3.2. Consistent with our mission, Prosper Global expects Team Members, Partners and Visitors to treat all children (defined as anyone under the age of 18), including members of the community and participants within our programs, with respect and dignity and to always act in the best interests of their physical and emotional well-being, and never engage in conduct that is or could be perceived as abusive or exploitative.

3.3. Prosper Global expects Team Members, Partners and Visitors to be constantly looking out for the best interests of Program Participants, especially the children with whom we work, to identify and minimize risks of harm, abuse or exploitation by others and to report and ensure follow up any time a Team Member, Partner or Visitor has reason to believe that a child is being harmed, abused or exploited by a Prosper Global Team Member, Partner or Visitor, or other aid or humanitarian worker.

3.4. All sexual activity or attempted sexual activity with children is considered child sexual abuse and is prohibited at all times (both during and outside of working hours) and in all places, regardless of the legal age of consent in the state or country where the child lives or an incident takes place. Mistaken belief in the age of a child is not a defense. Sexual activity with a child or the attempt thereof will result in termination of employment, and the pursuit of any other available legal remedy.

3.5. Prosper Global prohibits child labor, as defined by the International Labor Organization (ILO), and outlined in Section 5 of this Policy, in any of its programs, projects or operations. Prosper Global Team Members and Partners are prohibited from engaging child labor, including as domestic help, in their places of work, businesses or homes.

3.6. Prosper Global requires all Team Members, Partners and Visitors to immediately report knowledge or suspicions of child abuse or exploitation involving Prosper Global Team Members, Partners, Visitors, or Programs, or involving other humanitarian or aid workers. Reports should be submitted in accordance with Prosper Global's Speak Out! Policy. Prosper Global will review all such reports and will investigate in accordance with the Speak Out! Policy. Team Members who are aware of or suspect child abuse or exploitation and do not ensure that the issue is reported may be subject to discipline up to and including termination.

3.7. Persons who make good faith reports of suspected abuse or exploitation of children carried out by Prosper Global Team Members, Partners or Visitors or other aid or humanitarian workers will not be retaliated against for their reporting even if the allegations prove unfounded. Knowingly making false reports can, however, be grounds for disciplinary action.

3.8. Team members who violate this Policy will be subject to disciplinary action, up to and including termination, and may be ineligible for rehire. This ineligibility will be shared with prospective employers, including through the Interagency Misconduct Disclosure Scheme. They may also be subject to criminal prosecution. Partners who violate this Policy are in breach of any contractual agreements and may have their agreements terminated and/or be prohibited from working with Prosper Global in the future and may face criminal prosecution for any criminal conduct.

3.9. Prosper Global provides multiple avenues for submitting reports of child abuse or exploitation. Anonymous reporting options are available. Prosper Global ensures that all reports of child abuse or exploitation by Prosper Global Team Members, Partners or Visitors are reviewed, investigated by trained professional investigators, reported to donors in accordance with donor requirements, and reported to law enforcement where circumstances warrant. (see Prosper Global's Speak Out! Policy for details on how to report). Prosper Global will also ensure that child victims or survivors (or alleged victims or survivors) receive timely referrals for medical, psychosocial, or other support services.

3.10. This Policy is intended to ensure compliance with all relevant laws, regulations and donor requirements, including the international standards in the UN Convention on the Rights of the Child and International Labor Organization standards. Should any law or donor requirement exceed the requirements in this Policy, the donor or legal requirement will prevail.

## 4. Related Policies

- Speak Out! Policy
- Safeguarding Core Standards Policy
- Prevention of Sexual Exploitation, Abuse and Harassment of Program Participants and Community Members Policy
- Responsible Data Policy

## 5. Required Procedures

5.1. Prosper Global must ensure compliance with this Policy through the following actions as implemented through appropriate processes and procedures:

5.1.1. All potential new Team Members, and any volunteers, consultants, daily workers or others who may engage with children in any capacity must be screened appropriately and recruited safely before they are hired, including through background checks and Misconduct Disclosure Scheme (MDS) reviews where possible;

5.1.2. All Team Members must be informed and trained on what conduct this Policy requires (via code of conduct training) and their responsibilities under this Policy, including learning what constitutes child abuse and exploitation and how to report it, and all Team Members must certify that they understand this Policy and agree to abide by it;

5.1.3. Anyone in contact with children, including consultants, experts, donors, contractors, agents, representatives and Visitors (including journalists and researchers) must be informed of the requirements of this Policy and;

5.1.4. For each program, Prosper Global must identify the risk of harm to children and incorporate risk mitigation measures into the design and operation of the program (a risk-based approach) in accordance with the Safeguarding Core Standards Policy to ensure the risks of harm to children are minimized to the extent possible;

5.1.5. Prosper Global must require its Partners to commit in writing to act in accordance with the Policy Statements in this Policy, and any additional donor-required provisions relating to child safeguarding and to report to Prosper Global any allegations of child abuse or exploitation. Prosper Global must ensure that Partners have the capacity to ensure their compliance with this Policy, including conducting appropriate due diligence and monitoring of Partners to ensure they are not violating their commitments under this Policy.

5.1.6. Images, interviews and videos of children may only be taken after understanding their potential impact on the safety, dignity and well-being of the child, and in a manner that ensures respect for the child, including respect for their privacy, and in compliance with applicable laws. Published images of children should never include all three of the following risk factors. Where risks in a particular context or to a particular child are potentially higher, at least two factors should be removed.

5.1.7. Identifiable image of face

5.1.8. Specific location (including on school uniform, sign or other depiction in image itself)

5.1.9. Child's name

5.1.10. Identifiable images and stories of children may only be obtained and used after receiving informed consent from parents/guardians who must be informed of the various ways the images or story may be used. Consent should be documented using the Consent Form. For children over 12 years of age, in addition to parental/guardian consent, documented, informed consent must be obtained directly from the child.

5.1.11. Identifying information of child program participants may only be disclosed with their parent/guardian's written permission (and permission of the child over age 12) unless the sole reason for such disclosure is the urgent well-being or protection of the child;

5.1.12. Personal identifying information must be stored in a properly secured manner in accordance with our Responsible Data Policy;

5.1.13. Any communication with a child participant or community member via digital platforms (e.g. Facebook, Instagram, Twitter, SnapChat), via mobile technology (e.g. texting, WhatsApp, Skype), or online must be with the consent and knowledge of the child's parents, guardians, or caregivers. No communication on mobile, digital or online platforms with children may be sexual in nature or appear to involve grooming.

5.1.14. Prosper Global's computers, cameras, telephones, video recorders, communication channels, internet, or network systems must not be used to view or share sexually explicit images of children;

5.1.15. Program Participants and communities we serve (including children, where applicable) must be informed about Prosper Global's commitments under this Policy and how to report any suspected child abuse or exploitation by Prosper Global Team Members, Partners or Visitors;

5.1.16. Team Members, Partners, Visitors, Program Participants (including children, where applicable) and communities must report (anonymously if they choose) all forms of child abuse or exploitation by Prosper Global Team Members, Partners or Visitors via any available CARM or other channel. All such reports must be immediately provided to Prosper Global's Integrity Hotline (mercycorps.org/integrityhotline or integrityhotline@prosperglobal.org);

5.1.17. All reports must be confidentially, independently and thoroughly investigated by an investigator trained on how to conduct investigations into child abuse or exploitation and in a manner that prioritizes the protection and well-being of the child;

5.1.18. All reports must be disclosed to donors as required. If reports include allegations of criminal misconduct, they must also be disclosed to local authorities unless to do so would put a child at risk of harm;

5.1.19. Prosper Global will suspend any Team Member, Partner team member, or Visitor who is the subject of credible allegations of child abuse, or otherwise minimize risk of further harm, while Prosper Global and/or law enforcement investigates the matter.

## 6. Definitions and Acronyms

6.1. **"Child":** Any person under the age of 18 years of age.

6.2. **"Abuse":** Includes a range of behavior from physical abuse, emotional ill-treatment, sexual abuse, neglect or insufficient supervision, and resulting in actual or potential harm to a child's health, well-being, survival, development, or dignity. It includes, but is not limited to, any act or failure to act which results in death, serious physical or emotional harm to a child, or an act or failure to act which presents an imminent risk of serious harm to a child. It also includes attempted abuse.

6.2.1. **"Physical abuse":** Constitutes acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm or risk of harm to a child's health or welfare, or death. Such acts may include, but are not limited to, punching, beating, kicking, biting, shaking, throwing, stabbing, choking, or hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.

6.2.2. **"Emotional abuse":** Constitutes injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. It may include bullying, harassing, insulting, intentionally humiliating, inappropriately controlling, isolating a child from family, intentionally degrading, and any other deliberate activities that are intended to make a child feel isolated, diminished or embarrassed.

6.2.3. **"Sexual abuse":** Forcing, coercing, enticing or convincing a child to take part in sexual activities. This may include, but is not limited to, sexual touching of any kind, fondling a child's genitals, penetration, rape, oral sex, or sodomy. This may also include non-contact activities, such as exposing one's private parts to a child, involving children in looking at, or in the production of, sexual images or videos, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

6.3. Any **"Sexual activity with a child"** is a form of sexual abuse. All sexual contact or activity with anyone under the age of 18, in all places and at all times, both during and outside of working hours, regardless of the legal age of consent in the country or state of the child's residence or the location where the incident occurs. Mistaken belief in the age of a child is not a defense. This includes child marriage.

6.4. **"Sexual exploitation":** A form of sexual abuse that involves someone engaging, or attempting to engage, children in any sexual activity in exchange for money, gifts, food, accommodation, affection, status or anything else that they or their family needs or wants. This includes paying for sexual activity. It may also include involving children in looking at or being used to produce pornographic images or involvement in commercial sex work.

6.5. **"Child Exploitation":** Child exploitation is an umbrella term used to describe the abuse of children who are forced, tricked, coerced, trafficked or otherwise engage in exploitative activities. For Prosper Global, child exploitation includes child labor, or recruiting or forcing children into armed conflict, or other exploitative activities.

6.6. **"Attempted abuse or exploitation":** The intentional act of trying to engage in child abuse or exploitation whether it is physical, emotional or sexual abuse, but where for some reason the abuse does not actually take place.

6.7. **"Grooming":** Grooming is when an adult builds a relationship, trust or emotional connection with a child or young person so they can manipulate, exploit or abuse them. Examples of grooming behavior could include: singling a child out for special attention, buying gifts or giving extra benefits to a particular child, or contacting a child or communicating with a participant child outside of program activities.

6.8. **"Neglect":** Allowing for context, resources and circumstances, neglect refers to a persistent failure to meet a child's basic physical and/or psychological needs that is likely to result in serious impairment of a child's healthy physical, emotional and mental development. It can include, but is not limited to, failures to supervise, protect from known harms, provide adequate nutrition, shelter

or safe working/living conditions. It can also include acting in ways that may put a child at risk for exploitation or abuse.

6.9. **"Child Labor":** Following the International Labor Organization (ILO) definition, Prosper Global defines "child labor" as work that deprives children (anyone under the age of 18) of their childhood, their potential and their dignity, and that is harmful to their physical and mental development. Child labor includes work that:

6.9.1. Is mentally, physically, socially or morally dangerous and harmful to children; and/or interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

6.9.2. Aligned with ILO Convention 138, Prosper Global recognizes that not all work carried out by children below the age of 18 is child labor and that certain types of work, appropriate to a child's age and performed with adequate protection, may be beneficial to the child's development.

6.9.3. Whether or not particular forms of work are "child labor" depends on the child's age, the type and hours of work performed, the conditions under which it is performed, the objectives of the work and the legal and social setting of a given country. Examples of work that may be acceptable for children to engage in include:

6.9.4. Work performed by children in schools as part of their education or training.

6.9.5. Work performed by children at least 14 years old in enterprises, provided that the work is part of a program of a school or training institution or a apprenticeship approved by government authorities

6.9.6. Household chores as long as they do not interfere with education and are not hazardous

6.9.7. Work performed by children at least 14 years old, providing they are not performing hazardous work and work does not interfere with compulsory education

6.9.8. Participation by children in artistic performances acceptable under national laws and that does not interfere with education

6.9.9. Prosper Global considers the following to be innately hazardous and not appropriate for anyone under the age of 18: excavation, work with or near explosives or toxins, mining, or using dangerous machinery.

6.10. Online and/or digital risks: Prosper Global recognizes the range of risks to children and young people in the online context which include:

6.10.1. Contact Risks – children and young people can be at risk of contact from others such as bullying or grooming

6.10.2. Content Risks – children and young people can access content that is discriminatory, violent, sexual, extremist or otherwise harmful

6.10.3. Conduct Risks – young people can adopt risky or harmful behaviors such as creating sexual content without recognition of the potential impact (e.g. sexting, sending images of themselves to others) or bullying another young person.

In order to safeguard children from online sexual harassment, grooming for sexual abuse and exploitation, or other forms of abuse related to the risks identified above, all online activity where children may be involved must be assessed for safeguarding risk with plans for mitigation. This includes activities that involve the provision or use of computers, smartphones, or tablets to children.

## 7. Roles and Responsibilities

7.1. Prosper Global's Ethics and Compliance Department is responsible for ensuring this Policy remains up-to-date, compliant with donor requirements, and effectively implemented. In particular, the Ethics and Compliance Department is responsible for:

7.1.1. Maintaining this Policy;

7.1.2. Communicating this Policy to Team Members;

7.1.3. Providing training on this Policy for all Team Members;

7.1.4. Supporting Senior Management in all countries and areas where Prosper Global operates on the implementation and compliance of this Policy in all programs and operations;

7.1.5. Maintaining a reporting hotline (www.mercycorps.org/integrityhotline), which allows Team Members and Partners to report allegations of child abuse or exploitation, including anonymously, and ensuring Team Members and Partners are aware of the hotline and how to use it;

7.1.6. Monitoring Prosper Global's Integrity Hotline and responding to and ensure proper investigation and reporting of reports of violations of this Policy;

7.1.7. Maintaining a register of child abuse and exploitation allegations, which is the responsibility of the Ethics and Compliance Department, to identify trends and common issues and ensuring allegations are reported to the Joint Ethics and Safeguarding Committee;

7.2. Senior Management in all countries and areas where Prosper Global operates is responsible for:

7.2.1. Overseeing the full implementation of this Policy and the Safeguarding Core Standards Policy in their area of operations, with the support of the Ethics and Compliance Department, which includes ensuring Team Members are trained on this Policy and safe recruitment measures are in place;

7.2.2. Ensuring that all allegations of child exploitation, abuse, or other violations of this Policy are immediately reported to the Ethics and Compliance Department is; and

7.2.3. Creating and maintaining an environment and culture that promotes dignity and respect towards children and prevents any form of child exploitation and abuse.

7.3. The People Team is responsible for ensuring that child safe recruiting processes are in place including safeguarding risk levels, background and Misconduct Disclosure Scheme checks as applicable.

7.4. Managers, Country Directors, and heads of departments are responsible for ensuring that all team members undergo annual code of conduct training and sign the annual Code of Ethics completion certification.

7.5. The Grant Compliance team is jointly responsible with Country Teams for requiring partners to commit in writing to adhere to this Policy and for supporting Country Teams with appropriate due diligence and monitoring of Partners to ensure compliance with this Policy.

7.6. All team members are responsible for ensuring that images and stories they collect that involve children are obtained with the proper consent and consideration for the child's well-being as described in this Policy. The Marketing Operations Department is responsible for ensuring that images available on Identity Central have been obtained in accordance with this Policy.

7.7. Team members are responsible for ensuring that they understand and adhere to this Policy and immediately report any known or suspected violations of this Policy.

## 8. Policy Governance

Version 4 of the Policy was approved by the Prosper Global Board on March 7, 2023.

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| **RESPONSIBLE TEAM** | Ethics and Compliance Department | | |
| **POLICY OWNER** | Senior Director, Safeguarding | | |
| **EXECUTIVE SPONSOR** | Chief Ethics and Compliance Officer | | |
| **POLICY APPROVER** | Prosper Global Board | **PROSPER GLOBAL BOARD** | Prosper Global Board |
| **LAST REVIEWED** | March 31, 2025 (minor revisions) | | |
| **NEXT FORMAL REVIEW DATE** | April 1, 2027 | | |