

## Child Safeguarding

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Scope of policy: This policy applies to all PATH employees (including temporary and contract employees), consultants, contractors, sub recipients, volunteers, interns, fellows, or other talent program participants, individuals seconded to PATH, and anyone working on behalf of or representing PATH (“personnel”).

Department: Human Resources  
Owner (title): Global Human Resources Director  
Contact person: Laurie Harris  
Policy number: hr-bp.008  
Revised: May 2018

### Policy Summary

This policy describes PATH’s commitment to deterring all activities that would facilitate or condone abuse, exploitation or neglect of children who are served by PATH programs or who come into contact with PATH personnel implementing those programs. PATH prohibits any behavior or conduct that falls under the definitions set forth below.

PATH is committed to lawful, responsible, and ethical behavior in all of our activities. While such behaviors are broadly covered in PATH’s Code of Ethics, Governance, and Responsibility, this policy provides specific guidance on preventing any form of child abuse, exploitation, or neglect by PATH personnel.

### Definitions

Child: A child or children are defined as persons who have not attained 18 years of age.

Child abuse, exploitation, or neglect: Any form of physical abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; or commercial, transactional, labor, or other exploitation resulting in actual or potential harm to the 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.

Physical abuse: 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, hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.

Sexual Abuse: Constitutes fondling a child's genitals, penetration, incest, rape, sodomy, indecent exposure, and exploitation through prostitution or the production of pornographic materials.

Emotional abuse or ill treatment: Constitutes injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the child feel diminished or embarrassed.

## Human Resources

### Policy Statement

PATH strictly prohibits all PATH personnel from engaging in any form of child abuse, exploitation, or neglect.

#### Prohibited Activity

All PATH personnel must comply fully with host country and local child welfare and protection laws or with international standards, whichever gives greater protection, and must comply with U.S. law where applicable.

PATH personnel must consider child safeguarding in project design, planning, and implementation to determine and mitigate potential risks to children that are associated with project activities and operations.

PATH personnel implementing projects must take measures to reduce the risk of child abuse, exploitation, or neglect, including, but not limited to, limiting unsupervised interactions with children; prohibiting exposure to pornography; and complying with applicable laws, regulations or customs regarding the photographing, filming, or other image-generating activities of children.

#### Duty to report

PATH personnel are obliged to create and maintain an environment that prevents sexual exploitation and abuse of children.

PATH personnel who observe, suspect, or receive allegations of child abuse, exploitation or neglect must immediately report it to PATH following PATH's reporting procedure.

#### Consequences of Violations

PATH personnel who commit child abuse, exploitation or neglect; fail to report or forward reports of suspected child abuse, exploitation or neglect; or otherwise violate this policy or related procedures will be subject to disciplinary action, up to and including termination of employment or contract.

#### Related Policies and Procedures

- Procedures for Child Safeguarding
- Policy for Trafficking in Persons
- Procedures for Trafficking in Persons
- Code of Ethics, Governance, and Responsibility

#### External References

- USAID Standard Provisions for U.S. Nongovernmental Organizations M27 Child Safeguarding (June 2015)
- UN Secretary-General's Bulletin On Special Measures for the Protection from Sexual Exploitation and Sexual Abuse <https://oios.un.org/resources/2015/01/ST-SGB-2003-13.pdf>
- InterAction Private Voluntary Standards on Sexual Exploitation and Abuse