Safeguarding of Children Policy

Effective: October 2026

Purpose

HIAS is committed to assuring safe environments for children, free from any harm caused from their participation in HIAS programming or contact with HIAS Associated Personnel. HIAS maintains a zero-tolerance approach to any form of abuse, neglect or exploitation of children. We expect that anyone working in the name of or on behalf of HIAS will treat all children with dignity and respect, and not engage in conduct that is abusive, exploitative, or negligent. While HIAS does not tolerate any form of abuse, this Policy specifically covers any form of abuse, neglect or exploitation of children caused by:

- The conduct of HIAS Associated Personnel.
- The design and implementation of HIAS' programs and activities, including operations, employee recruitment, procurement, fundraising, and communications.

This policy does not cover:

- Sexual exploitation or abuse of adults, as this is addressed by HIAS' Safeguarding Policy for Protection from Sexual Exploitation and Abuse (PSEA)
- Discrimination, harassment, or bullying of Program Participants or community members that does not amount to exploitation, abuse, or neglect which is covered by HIAS' Anti-Discrimination, Bullying, Harassment, and Abuse of Power Policy (see Associated Policies below).
- Child protection concerns in the wider community not perpetrated by HIAS Associated Personnel.

See Appendix A for a glossary of terms and definitions.

Applicability

This Policy applies to all HIAS staff and other Personnel, HIAS Partners and HIAS Visitors globally (collectively referred to as "Associated Personnel").

This Policy applies at all times, including outside working hours.

Following this Policy is mandatory. Non-compliance will lead to disciplinary action, up to and including termination. Associated Personnel found to have committed sexual exploitation and/or abuse or engaged in sexual activity with children may also be subject to criminal action.

For HIAS Partners, violation of this Policy or failure to take appropriate corrective action may result in suspension or immediate termination of the partnership agreement and may also result in the party being deemed ineligible for future partnership agreements with HIAS.

HIAS follows the law. If any part of this policy conflicts with the law, the law must be followed. However, if HIAS' standards for Safeguarding are stricter than the law, then HIAS' standards must be followed.

Policy Statement

HIAS is committed to the prevention of any form of abuse, exploitation, or neglect of children through participation in our programming and/or or contact with Associated Personnel. HIAS will operate in a way that minimizes opportunities for abuse or exploitation to occur and commits to engaging in responses to concerns in a timely, survivor-centered manner.

HIAS is committed to Safeguarding children by protecting them from harm in alignment with the United Nations Convention on the Rights of the Child (UNCRC).

All Associated Personnel are required to comply with the following:

- Any sexual activity with any child is prohibited. A child is defined as any person under age 18, regardless of the age of majority or age of consent locally. Claiming to not know a child's age is not a defense.
- Possession/use of any child sexual abuse material (physical or digital, whether portraying an actual child, child likeness or computer/AI generated child imagery) is prohibited.
- Physical, emotional, or sexual abuse or exploitation of any child, regardless of program participation is prohibited.
- Associated Personnel may not recruit or utilize any child for labor which could be harmful or hazardous, or which prevents a child from attending school. Additionally, Personnel will follow all local labor laws regarding the employment of children.
- Physical punishment or discipline of a child, such as spanking, caning, slapping, forcing a child to carry heavy objects, etc. is prohibited in program activities.
- Associated Personnel may not be alone with a child Program Participant somewhere that is isolated or where they cannot be observed by others.
- Program design and implementation must minimize risks to children. This includes ensuring appropriate staffing to support programmatic oversight, assessment of physical structures and implementation of safety mechanisms and use of developmentally appropriate activities.
- Associated Personnel must not contact children outside of established programmatic activities or programmatic reasons. This includes in-person, phone and digital contact, including through social media.
- Associated Personnel must request and receive consent from children and their parents or guardians before taking any photographs or videos of children and may not publicize these without the written consent of parents or guardians, including for personal use. Any publication of children's likeness or information must monitor for and mitigate risk of inappropriate identification or exploitation.
- Associated Personnel should exercise good judgment and act in ways that uphold the dignity and respect of children and avoid actions or behavior that could lead to abuse or exploitation.
- Associated Personnel must immediately report any concerns or suspicions of conduct that violates this Policy via HIAS' reporting mechanisms.
- Associated Personnel must cooperate in any investigation when requested.

Managers and leaders must:

- Promote a culture that prevents abuse and supports this Policy.
- Make sure their teams understand and follow the Policy.
- Take all reports seriously and either personally report concerns via HIAS' reporting mechanisms or ensure staff under their supervision immediately complete reporting responsibilities.
- Protect whistleblowers from retaliation.

- Ensure staff performance supports a safe and accountable workplace.
- Ensure all members of their team attend proper training on Safeguarding children.
- Build systems that help enforce this Policy.

HIAS will:

- Design and implement all programs and activities (including data and content gathering) in a way that protects children from abuse, exploitation or neglect, that may occur through participation in programming or from contact with Associated Personnel.
- Organize the work of Personnel and the physical layout of the workplace to minimize risks when working with children. In particular, this means keeping activities visible to others and ensuring the presence of at least two adults when working with children.
- Use strong Safeguarding practices when hiring and managing staff, including by conducting relevant and legally obtainable criminal background, reference and Misconduct Disclosure checks.
- Train all staff on this Policy and their specific responsibilities at hire and annually thereafter.
- Post clear, visible information about this Policy and how to report concerns in all offices and project sites, in relevant languages.
- Assign a Safeguarding focal point in each country to support staff, raise awareness, and receive reports.
- Inform child Program Participants, their caregivers and communities about this Policy and how to report Safeguarding concerns. Information to children must be presented in developmentally appropriate ways and using language suitable for the child's age.
- Provide multiple child-friendly safe, confidential, and accessible ways for people to give feedback or report concerns, as outlined in the Accountability to Affected Populations Guidance. Reports will be escalated quickly to HIAS' General Counsel and the Global Safeguarding Team.
- Include the requirements of this policy in contracts and agreements with partners, assess their ability to follow this Policy, and monitor their compliance.
- Swiftly respond to any reports of conduct that violate this Policy, regardless of the time that has passed since the alleged conduct occurred.
- Follow national laws regarding work with children. If HIAS standards are stricter than local laws, HIAS standards will apply.

Reporting

HIAS requires all Associated Personnel to immediately report any Safeguarding concerns to HIAS' General Counsel by telephone (1-888-559-8518 or EthicsPoint numbers listed on website), email (ethics@hias.org) or www.hias.ethicspoint.com. Reports may also be submitted to Safeguarding staff or focal points where they are trained and in place. Reports may be submitted anonymously.

Any staff reporting concerns or complaints will be protected from any form of retaliation or negative employment consequences, per HIAS' Whistleblowing Policy. Anyone who knowingly gives false information will violate this Policy and may face disciplinary action.

HIAS' Global Safeguarding Team and General Counsel will report Safeguarding concerns to the Executive Group. They will also decide if the funder or donor needs to be informed, based on reporting rules. If the concern involves criminal behavior, it may be reported to relevant authorities, while considering the survivor's safety, security, and preferences.

Investigations

HIAS will carry out independent, confidential, and survivor-centered investigations by trained investigators based on a standard of Best Interest of the Child. Investigators will recognize the rights and interests of everyone involved, including the person making the report and survivor (if different from the reporter), witnesses, and subject of complaint. Investigations will be carried out according to HIAS' Standard Operating Procedures for Dealing with Safeguarding Concerns. If necessary, HIAS may also refer reports to other agencies for investigation.

Confidentiality

HIAS will keep all information about Safeguarding concerns confidential. Only people who need to know will be given access to the details, and all information related to the report and any follow-up actions will be stored securely. If laws like the European Union's General Data Protection Regulation (GDPR) apply, HIAS will follow those laws while still keeping information secure.

Associated Policies

- HIAS Code of Conduct
- HIAS Safeguarding Policy for Protection from Sexual Exploitation and Abuse (PSEA)
- HIAS Anti-Trafficking Policy
- HIAS Anti-Discrimination, Harassment, Bullying, and Abuse of Power Policy
- HIAS Whistleblowing Policy

Changes and Updates to this Policy

HIAS reserves the right to make changes and updates to this Policy as required. If modified, the Policy will be communicated to all HIAS Associated Personnel and posted on HIAS.net, indicating the date of the latest revision.

HIAS Personnel Safeguarding of Children Certification Form

- I confirm that I've received and read the HIAS Safeguarding of Children Policy. I understand what it says and agree to follow all its rules.
- I will report any possible or actual violations of this Policy or related procedures.
- I understand it's my responsibility to ask questions if anything in the Policy is unclear, and I've had the chance to do so.
- I understand that if I violate this Policy, fail to report a violation I know about, or intentionally hide a violation, I may face disciplinary action. This could include losing my job or contract with HIAS, and HIAS may take legal action against me.
- I also understand that violations may lead to criminal or civil penalties under the law, which HIAS may choose to pursue.
- I agree to sign this Policy when I start working with HIAS and again annually.

_____ _____

Print Name Position or Affiliation with HIAS

_____ _____

Signature Date

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APPENDIX A: Glossary of Terms

Associated Personnel refer to all HIAS Staff and Other Personnel, HIAS Partners and HIAS Visitors. Associated Personnel are covered by this Policy and are subject to Policy requirements.

Best Interest of the Child: HIAS makes decisions about child safety based on "Best Interest of the Child." This includes protecting their health, well-being, and emotional needs when responding to violations of this Policy. Whenever possible:

- Children will be allowed to share their views, and those views will be considered based on their age and maturity.
- HIAS will get permission from the child's (non-offending) parents or guardians before taking any action that affects the child.
- HIAS will ask the child for their agreement before moving forward in responding to alleged Policy violations.

Child is a person below the age of 18 - *UN Convention on the Rights of the Child, Article 1*.

Child Sexual Abuse Involves forcing, coercing, or enticing a child to take part in sexual activities which may involve physical contact (penetrative acts, touching etc.) or non-contact activities, whether or not the child is aware of, consents to, or initiates the behavior. Examples include all forms of sexual violence including indecent touching or exposure, using sexually explicit language towards a child, early and forced marriage, rape, involvement in pornography (including showing children pornographic material and viewing or disseminating child sexual abuse material), the exploitative use of a child in prostitution, and sexual slavery.

Child Sexual Abuse Material refers to sexually explicit content involving a child. This can include photographs, videos, art, computer-generated or artificial intelligence produced images that depict a child in a sexually explicit manner, or record a child being sexually abused. While the US government uses the term "child pornography" in criminal prosecution, the term "child sexual abuse material" is preferred in the sector and by survivors of abuse. *(Adapted from information taken from We Protect Global Alliance and Thorn).*

Emotional Abuse is harm to a person's emotional, intellectual, mental or psychological development. This may occur as a severe isolated event or on a pervasive, ongoing basis. Emotional abuse includes but is not limited to any humiliating or degrading treatment (e.g., bad name-calling; threats; yelling, screaming, or cursing; teasing; constant criticism; belittling; persistent shaming; etc.), failure to meet a child's emotional needs, and rejecting, ignoring, terrorizing, isolating or confining a child.

Exploitation is the actual or attempted abuse of a position of vulnerability, power differential, or trust to engage a a person in labor, domestic servitude, forced criminality, soldiering or organ harvesting. The exploitation may include but is not limited to: domestic servitude (e.g., cleaning, childcare, cooking, etc.) forced labor, forced criminal activities such as pickpocketing, begging, transporting drugs, manufacturing drugs, selling pirated merchandise, used to commit fraud, forced to become a child soldier or join a gang.

Harm is physical, sexual, or emotional abuse; neglect; or exploitation and other conduct that causes or creates an injury to an individual's physical safety, mental health, dignity, or substantial interference with an individual's legally protected rights.

Harmful Child Labor is work that, by virtue of the child's age or the nature of the work, is prejudicial to any aspects of the child's welfare, among other things the child's health or physical, mental, spiritual, moral or social development.

HIAS Partners refers to external parties in association (contractual or non-contractual) with HIAS such as HIAS' partners, affiliates, sub-recipients, suppliers, and vendors, working for or receiving funding from HIAS.

HIAS Staff and Other Personnel is (a) permanent, fixed term, and temporary staff; (b) board members; (c) outside consultants, independent contractors, and sub-contractors; (d) third-party representatives and agents; and (e) volunteers, community workers, interns and public service or fellows who conduct work on behalf of HIAS.

HIAS Visitor refers to visitors or guests at HIAS programs, programmatic sites or offices invited to HIAS locations or acting in an official capacity with HIAS Program Participants that are not otherwise covered by mutual agreements (such as UNHCR representatives) handled by contract or at the global level.

Misconduct Disclosure Scheme is an interagency agreement to systematically request and share information on substantiated allegations or ongoing investigations of sexual exploitation, abuse, and harassment (SEAH) during the recruitment process.

Neglect is the persistent failure (allowing for context, resources, and circumstances) to provide a child with the conditions that are culturally accepted as being essential for their physical, emotional and mental development and well-being.

Physical Abuse is the non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury or suffering to a child.

Program Participant is someone who directly receives goods or services from HIAS' program(s). In some locations or programs, a Program Participant may be referred to as a participant, client, beneficiary or beneficiary of services.

Safeguarding Children means any action, measure, or structure to prevent and protect any child from harm.

Safeguarding is the measures put in place by organizations to reduce harm that may be caused by inappropriate sexual activity, abuse or exploitation, or other exploitative or abusive conduct. It is the organization's responsibility to make sure their staff, operations and programs "do no harm" to children and vulnerable adults, and to not expose them to the risk of or actual harm and abuse.

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.

Survivor-Centered Approach: HIAS is committed to responding to all reports of conduct that violate this Policy with a survivor-centered approach. This means that the safety, dignity, and well-being of the survivor are the primary considerations in all steps that HIAS takes in responding to Safeguarding concerns and in taking precautions to minimize any additional harm to the survivor. HIAS will seek to ensure that survivors are referred to medical,

psychosocial, legal, and safety support services, as appropriate and available, and according to the survivor's specific needs and wishes. HIAS will assist survivors with reporting incidents to the proper authorities should they choose.

Whistleblower is a person who reports a reasonable belief that one or more HIAS Associated Personnel has violated a law, rule, regulation or HIAS policy. This person can expect to be protected from retaliation when making a report, in line with HIAS' Whistleblowing Policy.

Zero Tolerance is the organization's responsibility to adequately respond to any concerns of violations of this Policy. This includes the obligation to report any knowledge, suspicion, or concern about a Safeguarding violation, the responsibility to investigate any concerns that are brought to our attention, and, in the case of substantiated allegations, to respond with adequate remedial and corrective measures, including through disciplinary action, up to and including termination of employment or a third-party agreement.