



Child Protection Policy

This policy affirms the commitment of NESsT Inc. and its associated legal entities (hereinafter referred to as NESsT) to protect children from discrimination, harm, abuse and exploitation. NESsT endorses the UN Convention on the Rights of the Child (1989) and specifically Article 19 which states:

Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.

In compliance with the UN Convention of the Rights of the Child, NESsT considers a child to be a person below the age of 18 years. NESsT adheres to local and international child protection criminal laws, which prohibit the abuse and exploitation of children.

NESsT also seeks to address all levels of child protection that may be directly affected by the organization's work, and will regularly revise its policy to ensure that it remains relevant and complies with current legal requirements.

The purpose of this policy is to inform NESsT trustees, employees and volunteers about child abuse and exploitation and provides guidance on how to respond to concerns and allegations of child abuse and exploitation. It also provides a framework for representatives of social enterprises who enter into agreements with NESsT for funding and/or business development support (hereinafter referred to as NESsT Portfolio Enterprises) to implement within their own organizations.

APPLICATION

The following standards apply to all NESsT trustees, employees and volunteers who come into contact with children while supporting, working or officially traveling for NESsT.

Representatives of NESsT Portfolio Enterprises are required to affirm their commitment to protecting children in their own organizations when they sign their Memorandum of Understanding (MOU) with NESsT, which legally formalizes the partnership.

Unlawful or other conduct by NESsT trustees, employees, volunteers or representatives of NESsT Portfolio Enterprises that violates the intent of the Child Protection Policy & Standards and jeopardizes NESsT's reputation or position, whether during or after business hours, will not be permitted or tolerated and will be grounds for termination of employment or exit from the portfolio.

DEFINITIONS

The abuse of a child can occur in several different ways, including:

- **Physical abuse:** Occurring when a person purposefully injures or threatens to injure a child and can include, but is not limited to, slapping, punching, shaking, kicking, burning, shoving or grabbing.
- **Emotional abuse:** A chronic attitude or behavior directed at a child whereby a child's self-esteem and social competence is undermined or eroded over time. This can take the form of, but is not limited to, name calling, bullying, threatening, ridiculing, ignoring, devaluing, terrorizing or isolating a child.
- **Neglect:** The failure to provide a child with the basic necessities of life, such as food, clothing, shelter, space and supervision, to the extent the child's health and/or development are placed at risk.
- **Sexual abuse:** When a child is used by another person for his or her own sexual stimulation or gratification. Sexual exploitation is the abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the exploitation of another. Child prostitution and trafficking in children for sexual abuse and exploitation are examples of this.
- **Commercial or other exploitation of the child:** Refers to the use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labor. These activities are to the detriment of the child's physical or mental health, education, moral or socio-emotional development (WHO, 1999). Children being recruited for armed conflict would also come under this category.

CORE OBLIGATIONS

All NESsT trustees, employees, volunteers and representatives of NESsT Portfolio Enterprises should:

- Treat all children with the highest standards of respect and courtesy regardless of age, ancestry, color, creed, ethnicity, family responsibilities, gender, gender identity or expression, level of income, marital status, national origin, perceived or actual sexual orientation, physical or mental disability, political affiliation, pregnancy, race, religion, sex, or other protected class or characteristic as may be prohibited by U.S. federal and/or Maryland state law or other applicable nondiscrimination laws within the national and local jurisdictions where NESsT operates (as required by NESsT's Anti-Discrimination Policy)
- Familiarize themselves with situations that may present risks and learn how to deal with those situations

- Contribute to an environment where children are able to recognize unacceptable behavior and feel able to discuss their rights and concerns
- Minimize instances of working alone with one child by employing the “two adult” rule and ensuring that adults are always visible to others when working with children
- Refrain from disclosing information (including the use of children’s last names and community information) without consent of the parent or legal guardian and restrict access to other identifying or contact information that may be stored for program purposes
- Handle with sensitivity the use of images of children on the Internet and do not use images without consent from the parent or legal guardian
- Raise any concerns about any case of suspected abuse in accordance with applicable procedures

ORGANIZATIONAL AWARENESS & TRAINING

All NESsT employees and volunteers will be educated in NESsT’s Child Protection Policy and Standards and that compliance is required. The Child Protection Policy and Standards are part of the NESsT Employee Handbook, which is reviewed by new employees and volunteers during orientation and by current employees at least annually. All employees are required to sign an acknowledgement form stating that they have reviewed, understand and will comply with the policies.

The NESsT Employee Handbook also includes the Anti-Discrimination Policy and Reporting Procedures and the Code of Conduct, both of which require employee compliance with policies to protect against discriminatory behavior and practices.

The NESsT operations team is responsible for providing training on the Child Protection Policy and Standards during new employee orientations and for holding refresher trainings, as necessary. NESsT portfolio directors are responsible for ensuring board members and advisory network volunteers are informed about the Child Protection Policy and Standards.

Representatives of NESsT Portfolio Enterprises will also be informed of and provided with a copy of NESsT’s Child Protection Policy and Standards. Representatives of NESsT Portfolio Enterprises will receive notification of the standards in a Welcome Letter, which explains requirements for cooperation with NESsT. Representatives are required to affirm their commitment to protecting children in their own organizations when they sign their Memorandum of Understanding with NESsT, which legally formalizes the partnership.

The Memorandum of Understanding also includes the NESsT Commitment to Integrity, which requires compliance with policies that protect against discriminatory and exploitative behavior and practices that may devalue the dignity or self-worth of constituents.

NESsT portfolio directors are responsible for ensuring the NESsT Portfolio Enterprises in their region have reviewed and acknowledged a commitment to protecting children as part of the Memorandum of Understanding documents.

NESsT archives signed hardcopy MOUs within the relevant local office and electronically on the organization's secure document-sharing platform (SharePoint).

RECRUITMENT AND STAFF MANAGEMENT PRACTICES

NESsT recruitment and selection process follows local legal requirements and the stated Anti-Discrimination Policy documented in the NESsT Employee Manual. The recruitment process involves: (1) open posting of a position to local and international job boards, (2) use of a standard application form, (3) a scoring system that ranks candidates on job requirements, and (4) a series of interviews with short-listed candidates who are evaluated by at least two employees at NESsT. The operations team conducts reference checks before an offer of employment is extended. All employees are required to provide official or government-issued proof of identity documents, such as a passport, before beginning their employment with NESsT.

Background checks are not currently required as part of the recruiting process, since NESsT employees and volunteers do not regularly work with or come into direct contact with children while supporting or working for NESsT. However, if NESsT determines it is necessary or appropriate, background checks may be conducted for employees and volunteers whose work brings them into direct contact with children. Background checks may include police record or criminal history checks.

New NESsT employees receive performance evaluations after the first six months of employment. After that, performance evaluations are conducted on an annual basis. Performance evaluations include peer assessments, a self-assessment and the supervisor's evaluation.

Inappropriate behavior towards children, including failure to follow NESsT's Child Protection Policy and Standards, is grounds for discipline, up to and including dismissal from employment, volunteer/internship and board/advisory network membership.

Representatives of NESsT Portfolio Enterprises should develop recruitment and staff management practices that will ensure a child-safe environment in their organizations. These practices should be documented in a child protection policy for their organizations.

TRAININGS OR EVENTS

NESsT does not regularly hold trainings or events where children are in attendance. However, some NESsT Portfolio Enterprises may offer training to young people under the age of 18 years as part of their programmatic work. If children are expected to participate in trainings or events, NESsT and NESsT Portfolio Enterprises should adhere to the following requirements:

- All trainings or events for children or young people will be conducted under the supervision and with attendance of their parents, legal guardians, teachers, tutors, parents, etc.
- Parents or legal guardians must provide written permission for children attending trainings or events. Information about the time, place, content and materials to be used at the training or event must be shared when requesting written permission. Any parent, legal guardian or child

has the right to refuse to participate in an activity in part or full at any stage of the training or event.

- The location of the training or event should be in a public location that is accessible to people with disabilities. The location must also meet all local fire and safety regulations, have a first aid kit and/or other emergency medical supplies, and have access to a telephone.
- All computers and other equipment used at the training or event must meet local regulations for safety (i.e. EU certification) and training is provided to any users of the equipment. Children and young people should be supervised when using equipment at a training or event. Internet usage by children should be limited and/or monitored during the training or event.
- Parents or legal guardians must provide written permission if the training or event is being recorded via video or photography.

INFORMATION AND COMMUNICATIONS ABOUT CHILDREN

NESsT does not regularly come in direct contact with children as part of its core work. However, it may receive information and photographs, video or other information from NESsT Portfolio Enterprises.

NESsT undertakes all reasonable precautions to protect this information about children in paper and electronic formats and expects representatives of NESsT Portfolio Enterprises to do the same. At all times, employees and volunteers are required, to the best of their abilities, to adhere to the following policies to protect the privacy of children.

IDENTIFYING OR CONTACT INFORMATION

- NESsT employees and volunteers do not regularly work directly with children. However, NESsT collects data for impact reporting purposes regarding (1) the number of people who have attended trainings or events and (2) the improvements of livelihoods of beneficiaries of NESsT Portfolio Enterprises. A small portion of these data pools may include young people under the age of 18 years and identifying contact information is kept in separate systems from the relevant impact data.
- Attendees of NESsT trainings and events are tracked for impact reporting purposes. NESsT does not enter contact information for children under the age of 18 into this tracking system. Only attendance by the young person will be noted to ensure accurate training numbers are recorded.
- NESsT completes an annual survey of the beneficiaries of NESsT Portfolio Enterprises, and a small portion of the beneficiaries may be young people below the age of 18 years. All contact information is kept in a separate system from the survey data (i.e. income, education, employment information, etc.), and access is restricted to senior-level employees. All beneficiaries are informed that records are kept, what kind of data is collected and the reason for recording the data (i.e. tracking performance, helping them to find jobs and monitoring social impact of portfolio organizations).
- Additionally, representatives of NESsT Portfolio Enterprises who work directly with children or young people may collect information for programmatic purposes. If information is shared with NESsT, access is only given to a small number of NESsT team members working on the program. Details are held securely and access to NESsT computer systems are protected by passwords.
- NESsT Portfolio Enterprises who work with children are expected to set up appropriate safeguards for protecting identifying or contact information collected for programmatic purposes.

PHOTOGRAPHS, VIDEOS AND STORIES

- All communications involving children must use images and text that are decent, respectful and age-appropriate. Photographs and videos must present children in a dignified and respectful manner and not in a vulnerable manner that endangers their safety. Children should be appropriately clothed for their cultures and depicted activities. Images and text should be honest representations of situations and facts.
- The identities of children in photographs and videos are not disclosed without the written consent of the parents or legal guardian. Once consent is given, a child may only be identified by his or her first name and home country.
- Representatives of NESsT Portfolio Enterprises must obtain and keep consent documents on file for any photographs or videos that they capture or produce that include children. In providing photographs, videos or other information (i.e. stories) about children to NESsT, they are affirming that they have received and recorded consent from the parents or legal guardians.

- NESsT is responsible for obtaining and keeping consent documents for photographs, videos or other information (i.e. stories) featuring children that may be produced by NESsT employees or volunteers during site visits to NESsT Portfolio Enterprises or during trainings and events.
- Photographs and videos not utilized must be securely stored with access being limited only to relevant employees or volunteers.

REPORTING AND INVESTIGATION GUIDELINES

All NESsT trustees, employees and volunteers must raise any concerns of inappropriate behavior immediately, including the following situations:

- Disclosure or allegation from a child, community member or NESsT trustee, employee, volunteer or representative of a NESsT Portfolio Enterprise regarding the safety, abuse or exploitation of a child
- Behavior by any NESsT trustee, employee, volunteer or representative of a NESsT Portfolio Enterprise that breaches this policy
- Inappropriate use of NESsT technology including computers and photographic equipment

Alleged cases of child abuse should be reported to the relevant portfolio director and/or the director of communications & operations depending on the location of the alleged abuse. They will refer the matter to local authorities and decide on other appropriate steps, including informing relevant NESsT officials and/or supporting criminal prosecution. The parents or legal guardians of the child(ren) involved in the alleged incident will be promptly notified in accordance with local regulations.

An alleged perpetrator of child abuse will be suspended from his/her normal relationship with NESsT during the investigation of the allegations. NESsT will sever all relations with any employee, volunteer or representative of a NESsT Portfolio Enterprise who is proven to have committed child abuse. Reinstatement will occur only after all allegations have been cleared to the satisfaction of the portfolio director, director of communications and operations, and Co-CEOs.

The director of operations oversees the Child Protection Policy and Standards at NESsT. The director of will consult with the Co-CEOs if the policy has been violated in any way in order to determine the best course of action. If the Co-CEOs are suspected of violating the policy, the director of operations will consult directly with the Chair of the Board of Directors. The Co-CEOs will also consult with the Board of Directors if they determine that NESsT could be in jeopardy as a result of the violation and determine the best course of action.

The Board of Directors will provide input and approval on any changes or updates to this policy.