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Cambodian Center for Human Rights

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CHILD PROTECTION POLICY



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CCHR CHILD PROTECTION POLICY

1. Introduction

The Cambodian Center for Human Rights (“CCHR”) has a vision of a peaceful Cambodia in which all people can enjoy the fundamental human rights to which they are entitled, all are subject to the rule of law without impunity, all are treated equally without discrimination, all are empowered to participate fully in the democratic process, and all can share in the benefits of Cambodia’s sustainable economic development. This vision commits CCHR to work towards the eradication of discrimination in all its forms. In line with this vision, CCHR does not tolerate sexual harassment or abuse of any kind in the workplace – all forms of harassment are unacceptable and may result in disciplinary action or dismissal. CCHR outlines the ways in which its commitment to protect individuals from sexual harassment and abuse must be adhered to by every employee.

This Child Protection Policy (“Policy”) outlines CCHR’s principles and procedures for safeguarding children and preventing exploitation. CCHR is committed to ensuring that no child is harmed by our staff, programs, or partners, and that every child we encounter is treated with dignity and respect. The Policy also provides clear expectations to protect staff and promote equality within the organization.

Aligned with the UN Convention on the Rights of the Child (UNCRC), the Policy integrates child protection into CCHR’s culture, conduct, programs, operations, and communications. It should be read alongside CCHR’s Gender Policy, Equality and Diversity Policy, Employment Policy, and Sexual Harassment Policy.

2. Definitions and Terms Used

- **Child:** Any person under the age of 18 (according to the Constitution of the Kingdom of Cambodia).
- **Child Abuse / Maltreatment:** Any form of physical, emotional, or sexual abuse, neglect, or exploitation that results in actual or potential harm to a child’s health, development, or dignity.
- **Child Sexual Abuse:** The engagement of a child in sexual activity by an adult or by another child who holds power, responsibility, or trust over them. It includes inducing or coercing a child into unlawful sexual activity, child prostitution, the production, distribution, or possession of child sexual materials, and involvement in sexual performances or grooming.
- **Exploitation:** The use of a child for the benefit or gain of another person. This includes activities such as child labor, prostitution, trafficking, or the production of sexual materials. Exploitation undermines a child’s health, education, development, and dignity.
- **Emotional Abuse:** It refers to any act or pattern of behavior toward a child that causes, or is likely to cause, harm to their physical, mental, spiritual, moral, or social development. It may include restricting a child’s movement, belittling or scapegoating, frightening or humiliating behavior, discriminatory treatment, ridiculing, or any other persistent hostile or rejecting actions.
- **Physical Abuse:** Any act that results in actual or potential physical harm to a child. Physical abuse may arise from an act, omission, or failure to act by a parent, caregiver, or any person in a position of responsibility, trust, or power. It may occur as a single incident or as repeated incidents.

- **Direct Contact with Children:** Being physically present with children during CCHR's work, activities, or programs.
- **Indirect Contact with Children:** Having access to children's personal information, images, case files, reports, or any funding, programming, or communication processes that affect children, even without physical presence.

3. Purpose, Guiding Principles, and Values

3.1 Purpose

The purpose of this policy is to establish clear standards and procedures that prevent and respond to child abuse and exploitation within CCHR's sphere of influence. It ensures that all conduct, decisions, and actions by CCHR personnel consistently prioritize the best interests, safety, and well-being of children, and comply with applicable national laws and international child-protection standards.

3.2 Guiding Principles and Values

- **Best Interests of the Child:** All actions and decisions must prioritize the child's safety, well-being, and development, ensuring that harm is prevented or minimized at every stage.
- **Non-Discrimination:** Every child is entitled to equal protection from abuse and exploitation regardless of gender, ethnicity, disability, religion, socio-economic status, legal status, or any other characteristic.
- **Child Participation:** Children—and their parents or guardians, where appropriate—should be encouraged to express their views. Their perspectives must be considered and given appropriate weight according to their age, maturity, and evolving capacities.
- **Zero Tolerance of Abuse:** CCHR maintains a strict zero-tolerance approach to all forms of child abuse and exploitation. A mistaken belief about a child's age does not constitute a defense for misconduct.
- **Do No Harm & Respect for Dignity:** All interactions, language, and decisions must uphold the dignity, privacy, and safety of children. Activities should be designed and implemented in ways that avoid creating risks or causing harm.
- **Shared Responsibility & Accountability:** Child protection is a collective obligation. All personnel share responsibility for preventing, identifying, and reporting concerns. The Management Committee is accountable for ensuring proper oversight, adequate resources, and continuous improvement.
- **Confidentiality:** Information related to child protection concerns must be handled with strict confidentiality. It may only be shared on a **need-to-know basis** to ensure the safety of children, support appropriate action, and protect the rights of staff involved.

4. Scope of the Policy

This Policy applies to all individuals who work for, represent, or act on behalf of CCHR. Specifically, it covers:

- All CCHR employees, as defined in the Employment Policy, including full-time, probationary staff, consultants, interns, and volunteers engaged by CCHR in any capacity.
- Contractors and service providers are hired by CCHR, regardless of the duration or nature of their engagement.

- Any person participating in CCHR’s work, programs, or activities, including partners or collaborators who may meet children or access child-related information.

This Policy applies to all situations arising from, during, or connected to CCHR employment or roles. It covers activities and responsibilities carried out in the workplace, commuting to and from work when acting in an official capacity, and any representation of CCHR outside the office—including meetings, workshops, trainings, conferences, and field missions.

Thus, the scope of this policy also extends to beneficiaries of CCHR’s programs and projects, ensuring that all children connected to CCHR—directly or indirectly—are protected from harm.

5. Staff Recruitment and Procedures

CCHR integrates safeguarding considerations at every stage of the hiring process. Safer recruitment requires robust screening practices designed to evaluate the candidate’s suitability, experience, and values related to child protection.

5.1 Recruiting Process

- Inform applicants early in the process that child safeguarding is a core organizational priority, and that adherence to the Child Protection Policy is mandatory for employment or engagement.
- Use written applications that document the applicant’s qualifications, employment history, and relevant experience, especially in roles involving contact with vulnerable groups.
- Conduct structured interviews that assess both technical competencies and behavioral attitudes toward working with children, including scenario-based questions on safeguarding.
- Require at least two professional reference checks that include explicit questions about the candidate’s prior conduct with children, ethical behavior, disciplinary history, and suitability to work in a safeguarding environment.

5.1 Vetting

Beyond general screening, specific vetting measures are required for positions involving direct contact with children or access to children’s personal data or case information. Such measures require candidates to sign an Applicant Declaration, confirming:

- They have no previous convictions, investigations, or allegations related to child abuse, exploitation, or gender-based violence.
- They consent to CCHR completing any necessary background verification.
- They understand that providing false or misleading information is grounds for disqualification.

5.2 Conditional Engagement and Disqualification

Engagement with CCHR—as a staff member, consultant, intern, or partner representative—is conditional upon the successful completion of all required screening and vetting processes. CCHR may refuse employment or engagement if an applicant does not meet safeguarding standards, provides incomplete information, or raises reasonable concerns regarding suitability.

CCHR also retains the authority to suspend a hiring or engagement process while concerns are being reviewed, and to immediately terminate employment or engagement if new information indicates that an individual poses a risk to children or has breached safeguarding expectations.

5.3 Induction

All newly engaged personnel must complete a safeguarding induction before starting their duties. This induction provides an overview of CCHR's Child Protection Policy, expected behavioral standards, reporting obligations, disciplinary consequences, and staff roles and responsibilities in safeguarding.

The induction also covers CCHR's reporting mechanisms, including the requirement to report any concern within 24 hours, along with guidance on safe working practices, appropriate communication, and the safe use of digital tools and images. All personnel must sign a written acknowledgment confirming they have received, read, and understood the Policy and agree to comply with its provisions.

6. Standard Behavior of CCHR Staff

CCHR personnel must uphold the highest standards of ethical and professional conduct to ensure a safe, respectful, and protective environment for all children. These standards not only safeguard children from harm but also protect staff from false allegations by establishing clear professional boundaries. They apply to all staff, the Management Committee, consultants, interns, and contractors representing CCHR in any capacity.

6.1 Required Conduct

All CCHR personnel are expected to demonstrate conduct that promotes children's dignity, well-being, and rights. The following behaviors are mandatory:

- **Respectful and Rights-Based Interaction:** requires treating all children with respect, patience, and empathy. Staff should use language that is appropriate, non-demeaning, non-threatening, and free from discrimination. It is also essential to consistently uphold children's rights, including outside working hours, recognizing that staff conduct always reflects CCHR's values.
- **Maintaining Professional Boundaries:** requires applying the two-adult rule whenever possible to reduce risks of misconduct or false allegations. When this is not feasible, staff must use alternative safeguards such as working in open, visible areas or ensuring another responsible adult is present. Staff must also maintain clear physical and emotional boundaries and avoid any behavior that could appear as favoritism, secrecy, or inappropriate closeness.
- **Safe Physical Contact:** requires obtaining explicit verbal permission before any necessary touch, such as mobility support, comforting a child, or providing first aid. Contact must be appropriate, task-specific, non-invasive, and culturally respectful. Whenever possible, such interactions should occur in the presence of another adult to ensure transparency.
- **Safe Communications & Use of Images:** require strict adherence to CCHR's child-safe standards. Staff must obtain informed consent from the child and guardian before taking photos or recordings and ensure images respect dignity and do not cause harm, stigma, or trauma. Public materials must avoid identifiable details and must not sensationalize suffering.

or reveal private trauma. Digital boundaries must always be upheld, including avoiding private messaging, secret communication, or sharing personal contacts with children.

- **Upholding Organizational and Legal Responsibilities:** requires acting immediately on any concerns or suspicions of abuse in accordance with CCHR's reporting procedures. Staff must also ensure that their personal behavior—both online and offline—never violates child-safeguarding principles or places children at any form of risk.

6.2 Prohibited Conduct

The following behaviors are strictly forbidden and constitute grounds for disciplinary action, including termination:

- **Sexual Conduct and Exploitation** are strictly prohibited, including any form of sexual activity, contact, or communication with people under 18, regardless of perceived consent, cultural norms, or mistaken belief about age. Staff must also refrain from all grooming behaviors and from making sexual jokes, flirtatious remarks, suggestive comments, or engaging in any similar exchanges with children.
- **Inappropriate Physical Interactions** are strictly prohibited, including any culturally insensitive or unsuitable forms of touching such as hugging, kissing, fondling, sitting children on laps, back rubbing, or touching private body areas. Staff must also refrain from offering gifts, money, or special privileges to children in any manner that could be perceived as manipulative, coercive, or exploitative.
- **Isolation or Overnight Situations** that compromise child safety are strictly prohibited. Staff must not be alone with a child in private, isolated, or enclosed spaces where there is no visibility or the presence of another adult. Likewise, staff must never sleep in the same room, bed, or accommodation with an unsupervised child, except when the child is their own family member and such arrangements are both legally and culturally permissible.
- **Child Labour and Exploitation** are strictly prohibited. Staff must not hire children for domestic, personal, or informal work that violates national law or places them at any form of risk. Additionally, children must never be assigned tasks that interfere with their education, recreation, safety, or overall, well-being.
- **Misuse of digital tools** is strictly prohibited. Staff must not access, view, produce, store, or distribute any sexually exploitative material involving children. Additionally, staff are prohibited from taking photographs of children without proper permission or in inappropriate contexts, including situations involving distress, nudity, detention, or sensitive protection cases.
- **Abusive or degrading conduct** is strictly prohibited. Staff must never use physical punishment, verbal abuse, intimidation, humiliation, threats, or any form of harmful disciplinary action toward children. They are also prohibited from encouraging, enabling, or allowing unsafe, illegal, or abusive behaviors among children in any circumstance.

6.3 Consequences of Violations

Consequences for violating these behavioral standards are severe, as such actions constitute a serious breach of CCHR's Child Protection Policy. Depending on the nature and gravity of the

violation, possible consequences may include verbal or written warnings, mandatory retraining or enhanced supervision measures, suspension pending investigation, or termination of employment, consultancy, volunteer engagement, or board membership.

When conduct may amount to a criminal offense, CCHR will report the matter to the appropriate law enforcement or child protection authorities, and may also inform relevant partner organizations, donors, or regulatory bodies where necessary. In all cases, CCHR prioritizes the safety, dignity, and well-being of children and will take swift and decisive action to address any misconduct.

7. Reporting and Investigation

All concerns must be reported within 24 hours. Investigations begin within 48 hours and follow child-friendly¹, confidential procedures.

- **7.1 Duty to report:** All personnel have a duty to report any suspicion, concern, observation, or disclosure of abuse, exploitation, neglect, or breach of the Policy within 24 hours. Failure to report such information in a timely manner constitutes a violation of CCHR's Child Protection Policy and may result in disciplinary action.
- **7.2 Reporting channels** for child protection concerns include the immediate line manager or Management Committee, and the Executive Director or Board of Directors. These channels ensure that all concerns are addressed promptly, appropriately, and in accordance with CCHR's safeguarding procedures.
- **7.3 Immediate protection:** If a child is at immediate risk, staff must take prompt action to secure the child's safety and contact the relevant authorities without delay, while also notifying the Management Committee as soon as possible. Immediate protection always takes precedence over internal reporting steps.
- **7.4 Investigation process:** It must be initiated within 48 hours. The Management Committee appoints an investigation committee to ensure a child-friendly, confidential, and impartial process. The individual accused will be informed of the allegation and given an opportunity to respond, with full respect for due process. Where necessary, an interim suspension may be applied to safeguard children and maintain the integrity of the investigation.
- **7.5 Records & confidentiality:** must always be upheld. Staff are required to use the standard incident report form, documenting verbatim statements, relevant dates and times, witnesses, and actions taken. All records must be stored securely with strictly restricted access to ensure confidentiality and protect the privacy and safety of the child and all individuals involved.

8. Responding to Investigation

8.1. Prioritize the Child's Safety and Well-being

CCHR must always place the child's safety, dignity, and best interests first. When abuse or misconduct is confirmed, disciplinary actions are taken, and support for the affected child

¹ "Child-friendly"- something is easy, safe, and nice for children to understand or enjoy. It uses simple words, kind ideas, and examples kids know. It does not include scary, confusing, or complex topics.

becomes the immediate priority. All responses must follow CCHR’s safeguarding standards and legal obligations.

8.2. Communicate the Investigation Outcome

At the conclusion of the investigation, CCHR informs:

- (a) the child and their guardian, and
- (b) the accused individual of the findings and any resulting actions. Communication must be respectful, confidential, and appropriate to each person’s role.

8.3. Actions When Abuse or Misconduct Is Substantiated

If abuse or misconduct is confirmed, CCHR provides necessary support to the child—including medical care, psychosocial support, and a tailored safety plan. Staff responsible for misconduct will face disciplinary measures up to and including termination.

8.4. Report on Criminal Offenses to Authorities

If misconduct involves a criminal offense, CCHR reports the case to the appropriate competent authorities and fully cooperates with all legal procedures. This includes cases involving expatriates or situations where extraterritorial jurisdiction may apply.

8.5. Actions When Allegations Are Unsubstantiated

If the allegation is not substantiated, CCHR provides appropriate support to both the accused and the reporting individual. Any maliciously false claims will be addressed, and lessons learned will be integrated into future safeguarding practice.

9. Information and Training

All staff are required to receive comprehensive induction and annual refresher training to ensure full understanding and compliance with CCHR’s Child Protection Policy. Induction training covers the Policy’s key provisions, expected behavioral standards, reporting pathways, potential disciplinary or legal consequences, and Policy for the safe use of images and information technology. Annual refresher sessions are conducted to reinforce learning, review lessons from past cases, and ensure that safeguarding practices remain current and effective.

In addition, all personnel must provide written acknowledgement, confirming that they have received, read, and understood the Policy. These acknowledgements are maintained in HR records, and any updates to the Policy are circulated to staff and require renewed acknowledgment to ensure continued awareness and accountability.

10. Advocacy

CCHR promotes and defends the rights of children across all its activities and communications. As a human rights organization, CCHR and its personnel commit to advocating for children’s rights within communities and public discourse, while consistently modeling right-respecting behavior both on and off duty.

All advocacy efforts must be designed to protect children from retaliation, stigma, or re-traumatization, including using anonymized case examples, safe and context-appropriate imagery, and dignity-preserving language.

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