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Section 1: INTRODUCTION

1.1. Children of the Mekong (COTM)

1.1.1. Children of the Mékong is an international charity headquartered in France. It was founded in 1958 through the action of a dentist in Vientiane Laos who started to help children and their families to escape from extreme poverty and to live with dignity.

1.1.2. COTM aims at providing education, training and support to help children and young people to improve their standard of living and to grow intellectually, emotionally and morally.

1.1.3. It acts in seven countries in Southeast Asia: Burma, Cambodia, China, Laos, Thailand, the Philippines, Nepal and Vietnam.

1.1.4. It runs 3 types of programs:

   1.1.4.a. Child and youth sponsorship with over 22,000 sponsored children in around 800 locations.
   1.1.4.b. Non formal education centres for children and students to provide them with good condition to study close to schools and universities.
   1.1.4.c. One-off development projects to support the sponsorship programs. Every year about 100 programs are funded with a budget of about 2 million euros. We support development projects such as:
   (a) Construction or equipment for education: Construction or renovation of schools, equipment, furniture, hygiene or mobility.
   (b) Social support and basic needs: construction or renovation of houses, social structures, health, nutrition, social entrepreneurship.
   (c) Holistic training: career guidance projects, scholarships, training or pedagogical activities, training of trainers.

1.1.5. COTM runs through a small central team supported by many volunteers:

   1.1.5.a. Sponsorship programs are managed by local volunteers, close to the field, being either religious, teachers, local associations. They are referred as “Local manager” below.
   1.1.5.b. Local coordination is managed by International Volunteers under VSI contract (an official contract under French laws). They are referred as “Bamboos” below.
   1.1.5.c. Fundraising is managed by groups of volunteers in France and abroad. The London office also handles fundraising and is set up as an independent charity. In the UK, the charity has been registered with the Charity Commission since 2011 (charity No 1116375). They are all referred to as “Branch” below.

1.1.6. COTM received material support from many parts:

   1.1.6.a. People and families sponsoring one or several children are referred as “sponsors” below.
   1.1.6.b. Companies, Trusts and Foundations or individuals funding development projects are referred as “funders” below.

1.2. Purpose and scope of the Safeguarding policy

1.2.1. Through its action, Children of the Mekong (COTM) faces thousands of children every day in different countries. Through its work with vulnerable communities, COTM is confronted with many situations where children can be abused, neglected, exploited or be ill-treated. It is its responsibility to take all the reasonable steps to prevent it.

1.2.2. This policy describes the different typologies of action and how it is linked to safeguarding issues.

1.2.3. This policy describes the anticipated risks and what is organised to prevent it or to handle it if it happens.
1.2.4. This policy lists all the existing policies, charters, legal documents that conduct COTM action regarding safeguarding policy.

1.2.5. This policy provides also general operating guidelines for COTM internal work such as confidentiality of information, rules of communication, recruitment methodology regarding safeguarding.

1.2.6. Children of the Mekong works with vetted local partner organisations in various countries. This Safeguarding Policy does not apply to partner organisations, who are independent entities with their own governance and management structures. However, Children of the Mekong recognises that by partnering with other organisations we are enabling them (through providing funds, training and other forms of organisational support) to work with children. For this reason, this policy has requirements of our programmatic work and who and how we partner with other organisations.

1.2.7. The Safeguarding Policy must be shared with all project partners, providing them with knowledge about what to expect from us and our staff (including codes of conduct and how to report concerns) as well as our requirements of them. A briefing about our Safeguarding Policy should take place with all partners (senior staff and relevant project team) as part of planned project management and monitoring visits.

1.3. Spirit of action

1.3.1. Following the spirit of its founder, René Pechard, COTM action is based on relationship, trust and loyalty in order to develop a family spirit between all actors.

1.3.2. All Local managers, bamboos, branches and staff share a common vision of the action. They are first selected because they share it.

1.3.2.a. The action is organized in order to deepen the relation between COTM and its volunteers and to create friendship.

1.3.2.b. Local manager and bamboos on the field are willing to help the children to grow. It starts with friendship before going into a material help.

1.3.2.c. Sponsors are part of this spirit of friendship and participate in it through the letters they write to their sponsored children or sometimes through field visits.

1.3.3. COTM is truly aware that abuse or neglect of children may happen. COTM is determined to protect the children under its responsibility from it.

1.3.4. As much as possible, like in a family, there will be no contractual relationship between the actors to preserve friendship.

1.3.5. The rules may be common to the association or particular to each country of action.

1.4. Legal basis

1.4.1. Children of the Mekong’s Safeguarding Policy is consistent with the following laws, frameworks and organisations’ principles, as amended from time-to-time:


1.4.1.b. Children Act 1989, currently providing the legislative framework for child protection in England;

1.4.1.c. Children Act 2004, which strengthens the 1989 Act and encourages partnerships between agencies and creates more accountability.
1.4.2. COTM follows the regulation of the countries wherever it leads its own action (Cambodia, the Philippines and Thailand). In the countries where COTM partners with other organizations, the management of regulation is led by its partners

1.5. Safeguarding team

1.5.1. In line with the organisational structure at COTM, the safeguarding team is composed of a General Safeguarding Officer and a Deputy. In addition, each country of action has a local safeguarding officer.

1.5.2. Role of the General Safeguarding Officer
   1.5.2.a. Day-to-day implementation, supervision and monitoring of the policies and rules described in this document
   1.5.2.b. Responsible in front of the board of trustees to demonstrates that the policy is followed
   1.5.2.c. Improve child protection practices and policies within the organization

1.5.3. Role of the Deputy Safeguarding Officer
   1.5.3.a. Assist the General Safeguarding Officer in his/her duty

1.5.4. Role of the local Safeguarding Officer
   1.5.4.a. Day-to-day implementation, supervision and monitoring of the policies and rules described in this document for their countries
   1.5.4.b. Manage and adapt local policies to the context of their countries
   1.5.4.c. Improve child protection practices within the action in their countries

1.5.5. The team is composed of:
   1.5.5.a. General Safeguarding Officer: Mr Damien VERNY, Action director
   1.5.5.b. Deputy Safeguarding Officer: Mr Loïc LAHALLE, Operations director
   1.5.5.c. Cambodia Safeguarding Officer: Mr Martin Maindiaux, country manager
   1.5.5.d. Laos and Thailand Safeguarding Officer: Mr Loïc LAHALLE, country manager
   1.5.5.e. Myanmar Safeguarding Officer: Mrs Anne MONMOTON, country manager
   1.5.5.f. The Philippines Safeguarding Officer: Mr Clément NICOT, country manager
   1.5.5.g. Vietnam and China Safeguarding Officer: Mrs Hélène CLAVEYROLAS, country manager

1.6. Section 2 : Types of operations

2.1. Typologies of action

2.1.1. Depending on places, COTM is working with five different typologies of action directly related to children and youth. Development projects are not considered here as they are either not directly connected to children (construction work) or linked to a sponsorship programme.

2.1.2. Sponsorship programmes with partners
   2.1.2.a. A Local manager coordinates the sponsorship program on the field for COTM
   2.1.2.b. These local managers are mainly religious people, teachers, staff of local associations or simple citizens. They are not contractually connected to COTM but handle the program on a volunteer basis.
   2.1.2.c. Most of them were already supporting the children of their programs before meeting with COTM. COTM gives them regular and long-term support to sustain their own action.
   2.1.2.d. They do not replace the families but try to support and advise them for education of their children. They are not legally responsible for the children.
2.1.2.e. Their task is to know the children and their families, to distribute the sponsorship, provide a simple accountancy, organise letter exchanges with the sponsors
2.1.2.f. Bamboos not only visit them regularly to maintain a deep link between COTM and them, but they also visit the families and follow the supported children, advise them in the management of the program, check accountancy and if the spirit of the program is being followed.

2.1.3. Sponsorship programmes (SP) managed by COTM
2.1.3.a. In some locations, COTM cannot find trusted local managers to handle the coordination of sponsorship programmes. In such cases, local COTM staff handles the coordination.
2.1.3.b. Local COTM staff who manage the programmes are social workers who have either graduated in the subject or have been trained internally where it is not possible to hire a graduate SW.
2.1.3.c. They do not replace the families but try to support and advise them for education of their children. They are not legally responsible for the children.
2.1.3.d. Local COTM staff are followed locally by bamboos

2.1.4. Partner centres
2.1.4.a. A local manager manages a structure that welcomes children, either boarding houses to bring the children near to schools and universities, or educational centres for orphans or care centres for handicapped, abused or street children.
2.1.4.b. These structures are part of a local organisation different from COTM. Most boarding houses or centres for orphans are run either by schools or religious congregations, in line with local regulations. Care centres are mostly run by more structured associations, some connected to international organisations.
2.1.4.c. These structures are responsible for the children they accommodate.
2.1.4.d. COTM acts as a donor to these structures and sponsorship is usually managed collectively, seen as a support to each sponsored child to live in the structure.
2.1.4.e. Bamboos visit them regularly to maintain a deep link between COTM and them, follow the supported children, advise them in the management of the program, check accountancy and if the spirit of the program is being followed.

2.1.5. Partner centres with Bamboos
2.1.5.a. Some partner centres request support of bamboos in their structure. The bamboos act as an older brother or sister to the children, helping them in daily life, counselling them, organising fun and pedagogical activities.
2.1.5.b. Bamboos are not legally responsible for the children.
2.1.5.c. COTM remains responsible for the behaviour of the bamboo but his/her daily tasks are guided by the local structure.

2.1.6. COTM centres
2.1.6.a. In some countries, COTM has created its own centres when civil society in that specific location is not yet strong enough to handle it. There is two types of centres:
   (a) Youth centres that accommodate children that attend secondary schools from grade 7 to 12
   (b) Student centres that accommodate young people over 18 that attend professional trainings or university
2.1.6.b. Youth centres are official structures in the country they behalf.
2.1.6.c. Student centres are mainly official structures in the country they behalf. Some might remain informal structures when all the students are of legal age and the situation does not require particular registration.
2.1.6.d. COTM is responsible for the youth accommodated in these centres.
2.1.6.e. Bamboos live in these centres in rooms separated from the youth. They handle the management of the centres with local staff of COTM.
2.2. **Countries of action**

2.2.1. Depending on the typology of action, COTM is not officially registered in all its countries of action.

2.2.2. Decision to register is guided by multiple parameters:
- 2.2.2.a. COTM leads its own action with children (sponsorship programmes or centres for children)
- 2.2.2.b. Risk of corruption
- 2.2.2.c. Freedom to help the poorest

2.2.3. Countries where COTM is registered: Thailand, Cambodia and the Philippines

2.3. **Map between typologies and countries of action**

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- X: Present
- Informal: Informal activities

- X & informal: Informal activities in some countries
Section 3: Safeguarding risks identification, prevention and response

3.1. Identified risks for children

3.1.1. COTM points out four types of child abuse:

3.1.1.a. Physical Abuse: including hurting or injuring a child, inflicting pain, poisoning, drowning, smothering or deprivation.
3.1.1.b. Sexual Abuse: including direct or indirect sexual exploitation or corruption of children by involving them (or threatening to involve them) in inappropriate sexual activities.
3.1.1.c. Emotional Abuse: repeatedly rejecting children, humiliating them or denying their worth and rights as human beings.
3.1.1.d. Neglect: the persistent failure to meet a child’s basic physical or psychological needs, including love, stimulation, safety, nourishment, warmth, education and medical attention, leading to adverse or impaired physical or emotional functioning or development.

3.2. Risk prevention

3.2.1. COTM mainly helps children who live with their families. Parents are legally responsible for the children. COTM can only act through parental training and counselling to prevent abuse in the families.

3.2.2. For all the actors directly operating with COTM, including staff, bamboos, branches and local managers, the following prevention steps are followed:

3.2.2.a. Safe recruitment through interviews focused on the spirit of action and validated recommendations
3.2.2.b. Close relationship through regular meetings and discussions to follow the spirit of action and detect any issues
3.2.2.c. Trainings
3.2.2.d. Specific charter of action to define the code of conduct to adopt

3.2.3. For all donors and funders that are rarely connected physically to the children, the following prevention steps are followed

3.2.3.a. Regular communication including the spirit of action and a positive vision of the situation
3.2.3.b. Specific charter to define code of conduct during field visits
3.2.3.c. No direct communication (letters, emails, social networks, phone) for under 18 children
3.2.3.d. Sponsors cannot visit their sponsored children unaccompanied. Depending on the situation, a bamboo and/or the local manager must accompany them.

3.3. Risk detection

3.3.1. With exception of sexual abuse, risk detection is complicated as local culture may be more tolerant than Western culture to a certain extent. Local advice will be required to identify what is acceptable or not in that specific culture.

3.3.2. Detection is based on multiple levels of monitoring:

3.3.2.a. Monitoring of the families by local manager. Local managers are encouraged to regularly visit the families and meet with the sponsored children.
3.3.2.b. Monitoring of the local managers and the families by regular visit of bamboo or staff
3.3.2.c. Monitoring of local staff by bamboo or staff
3.3.2.d. Monitoring of the bamboos by COTM staff through regular calls and field visits
3.3.2.e. Monitoring of letters written by sponsored children and their sponsor made by translator. Any suspicion of problem is forwarded to the local translation coordinator who may forward the letters to the local manager, bamboo or staff.
3.4. **Response to potential abuse**

3.4.1. The local manager leads most of the action. COTM funds and advises their own action. However, COTM cannot replace them for decision-making.

3.4.2. In case of potential abuse detected in a family in a program (sponsorship or centre) under responsibility of a partner:

3.4.2.a. Bamboo or staff must advise the local manager to work with local social services when it exists and is reliable, otherwise to work with local organization able to handle these situations.
3.4.2.b. Bamboo or staff must report to the local COTM safeguarding officer that will help to identify the correct response.

3.4.3. In case of potential abuse from a local manager:

3.4.3.a. Bamboo or staff must directly report to the local and the General Safeguarding Officer to identify the correct response.
3.4.3.b. Escalation to the upper hierarchy of the local manager will be made immediately when it exists. If not, a way to declare to the authorities will be found.
3.4.3.c. Support to the program will be stopped immediately to protect the children if a replacement cannot be found.

3.4.4. In case of potential abuse from a bamboo:

3.4.4.a. The local safeguarding officer must come to the place to analyse the situation.
3.4.4.b. Depending on the severity of the situation, the bamboo will be either coached, receive disciplinary action or have his/her contract terminated.
3.4.4.c. The chain of command guiding these decisions is the the Local Safeguarding Officer, the General Safeguarding Officer and the Human Resources Director.

3.4.5. In case of potential abuse in sponsorship program managed by COTM

3.4.5.a. The local staff must report immediately to the local social worker manager and to the local safeguarding officer.
3.4.5.b. Both will decide on the correct steps to follow depending on the gravity of the situation. They will follow local policies.

3.4.6. In case of potential abuse in centres managed by COTM

3.4.6.a. Local staff or bamboo must report immediately to the centre manager and to the local safeguarding officer.
3.4.6.b. Both will decide on the correct steps to follow depending on the gravity of the situation. They will follow local policies.
Section 4 : Available policies and procedures

4.1. Introduction

4.1.1. Since COTM operates in many different countries and contexts, a single document to gather all the policies and procedures cannot be provided.

4.1.2. Many criteria influence the current organisation:
   4.1.2.a. Local culture
   4.1.2.b. Local regulations and COTM’s chosen legal status within the country of action
   4.1.2.c. COTM direct or indirect responsibility for the children

4.2. General

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<th>Documents</th>
<th>Trainings</th>
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| General   | - Charte de déontologie (Charter of ethics), available in French  
- Document unique d’évaluation des risques professionnels, legal document in France to list all the potential risks for all people involved or beneficiary of COTM action | - France: Regular trainings and information workshop  
- Asia : yearly workshop and trainings |
| Staff     | - Charte du volontaire bambou (overseas volunteer policy), available in French | - Mandatory orientation and induction training including presentation of the UN Convention on the Rights of the Child  
- Midyear workshops |
| Bamboos   | - Charte du bénévole (volunteer policy), available in French | - Regular workshops (every one or two years)  
- Training for educators |
| Local manager | - Charte de visite de filleul (visit pack), available in French  
- Charte ambassadeur (volunteer policy), available in French | - Yearly workshop « Réunion de famille » |

4.3. Local legal documents

4.3.1. Cambodia
   4.3.1.a. Règlement intérieur (Rules of procedure), available in French and Khmer
   4.3.1.b. HR policy, available in French and Khmer

4.3.2. Philippines
   4.3.2.a. Youth protection policy
   4.3.2.b. Manual of Operations
Section 5: Confidentiality, communication and recruitment

5.1. Confidentiality

5.1.1. Only internal staff and bamboos have access to the database of the sponsored children. They are not allowed to communicate private information of the children outside of their work with COTM.

5.1.2. Staff and bamboo access to the database is restricted to the children of their country of operation.

5.1.3. A strong security access is set up to avoid breach into the database.

5.2. Communication

5.2.1. COTM communication policy is joy.

5.2.2. Without hiding the reality of the life of the sponsored children, it is against COTM’s policy to show pictures of children apparently sad or suffering. Any picture must respect the dignity of the people in it.

5.3. Recruitment

5.3.1. Staff

5.3.1.a. 2 steps interview
   (a) Personnel director
   (b) Operations manager

5.3.2. Bamboo

5.3.2.a. 3 steps interview:
   (a) Director of volunteers
   (b) Psychologist
   (c) Deputy General Director

5.3.2.b. 2 references
5.3.2.c. Internet check: social networks, blogs, videos…
5.3.2.d. Criminal record extract
5.3.2.e. Attend a recruitment day with situational activities, meetings with former volunteers

5.3.3. Branch

5.3.3.a. Through recommendation only
5.3.3.b. Interview with the person responsible for the branch

5.3.4. Local manager

5.3.4.a. Through recommendation only
5.3.4.b. Multiple meetings and discussions to validate the spirit of action
5.3.4.c. Visits of potential children to be supported before to start cooperation
Section 6 : Management of the Safeguarding policy

6.1. Revision cycles

6.1.1. Revision of the Safeguarding Policy is under the responsibility of the General safeguarding officer.

6.1.2. Revision of the related documents is under each country safeguarding officer and must be proofread by the General safeguarding officer.

6.1.3. Revision of local documents and ensuring that operations follow local regulation is the responsibility of the local safeguarding officer.