

### Statement

Stichting Kinderpostzegels Nederland (SKN) is committed to the human dignity of all people and thus does not tolerate any form of exploitation, abuse or harassment, whether verbal, physical or sexual in nature, anywhere in our organization or in our work.

### Scope

There are two groups in policy scope:

- **SKN Affiliated Person** is anyone officially affiliated with SKN: it refers to all full time and part time staff members, board members, volunteers, interns, consultants or independent contractors, and any other person who is officially contracted to represent SKN.  
*Affiliated Persons are expected to **comply** with the principles and requirements specified in this policy.*
- **SKN Associated Person** is anyone not officially affiliated with SKN who may however be associated or perceived to be associated with SKN: it refers to community partners (including animators, catalysts and the like), partner organizations, vendors, sub-contractors, investors, guests, or any other person who is perceived to be associated with SKN.  
*Associated Persons are expected to **act in accordance** with the principles and requirements specified in this policy.*

### Key Terms

**Safeguarding** is the set of measures designed to prevent and address behavior by SKN Affiliated or Associated persons that threatens the safety, well-being or human rights of others. Said behavior is unacceptable and is hereafter referred to as **misconduct**. Specific examples of such misconduct are detailed in Appendix A.

### Local Compliance

We recognize that laws and requirements may differ among countries, and that approaches cannot be universal. For those reasons, when needed, SKN may develop additional local policies to meet specific local requirements in any country. However, in no circumstances will the additional local policies serve to weaken or contradict this global policy.

### Accountability

Within the Supervisory Board, this policy resides under the member responsible for Integrity.

Responsibility for this policy lies with the Integrity Officer, who is:

- Naturally skilled with handling sensitive issues and information
- Trusted and respected by staff and community members
- Trained in how to handle safeguarding issues.

The Integrity Officer is tasked with the following key responsibilities:

- Brief new Affiliated Persons and conduct an annual local training on safeguarding
- Promote ongoing awareness on the importance of safeguarding
- Ensure that reporting mechanisms are in place, both in the workplace and in communities
- Conduct the initial fact gathering of any issues reported
- Coordinate with general management on concerns and investigations.

## **Approach**

This policy is organized by the four phases of Safeguarding:

- **Prevention:** proactive efforts to keep misconduct from occurring in the first place
- **Reporting:** procedures for detecting and reporting incidents that do occur
- **Investigation:** steps involved in fully understanding the facts of a reported incident
- **Discipline:** the unequivocal consequences of misconduct.

## **1. Prevention**

### **1.1 Policies**

This policy comes under the umbrella of SKN's Code of Conduct which is a set of guiding standards and principles that all representatives of SKN adhere to in practice and in spirit in all their decisions, procedures, actions and interactions.

All SKN Affiliated Persons are required to familiarize with and attest to the Code and its associated policies upon joining SKN and annually thereafter. Associated Persons are required to sign the Code prior to making visits to the field.

### ***Dissemination***

This policy will be made available on our website and in the policy handbooks of all SKN offices. It will be provided to all Affiliated Persons as part of their orientation. Summary forms of this policy with a link to the full policy will be provided to Associated Persons.

### ***Continuous Review***

By general management: Every reported incident will trigger a review of the policy to determine if, and which, change in our policies and practices could avoid a repeat of the same situation. New policies, white papers, training and recommendations from peer organizations or donors will be considered to improve the policy.

The policy will in any event be annually reviewed and updated as needed, informed by recommendations of the Integrity Officer.

## **1.2 Recruitment**

### ***Advertisement***

The job description and advertisement will refer to key policies including this safeguarding policy.

### ***Interview and References***

Appropriate questions are asked during the interview and reference check process to evaluate a candidate's commitment to safeguarding principles and to prevent prior offenders from joining SKN's team (see Appendix B).

### ***Background Check***

SKN Affiliated Persons who will work directly with children will be required, if available in their country of origin, to provide a certificate of good behavior. In addition, a criminal background check that specifically checks for prior incidents of child-related misconduct of any kind will be conducted.

## **1.3 Training**

Each employee will undergo safeguarding training on an annual basis. Any change in policy will be accompanied by appropriate training as necessary.

In order to further foster a culture of transparency and respect in line with our Code of Conduct, the annual training will include a broad discussion about moral dilemma, which staff may struggle with.

## **2. Reporting**

It is mandatory for all SKN Affiliated Persons to immediately report any witnessed, suspected or alleged misconduct whether the incident occurred at the workplace or in a community. SKN's Whistleblower Policy protects Affiliated and Associated Persons from adverse consequences of reporting incidents in good faith.

There is a deeply entrenched culture of silence around exploitation, abuse and harassment. For that reason, it is incumbent upon all SKN offices to create reporting mechanisms that make it *easy and safe* for victims and observers to report any such misconduct.

All alleged incidents must be reported by the Integrity Officer to general management in real time. SKN will report annually on all reported incidents and their outcome. Serious incidents are reported in real time to the Supervisory Board member responsible for Integrity.

## **3. Investigation**

All suspected misconduct must be investigated. This includes rumors as well as formal reports.

### **3.1 Investigator**

If the incident occurred in a country office, the Integrity Officer is responsible for the investigation, with support from general management. If there is any allegation that the Integrity Officer or general management is involved in the incident, the Supervisory Board member tasked with Integrity is responsible for the investigation

Depending on the seriousness and complexity of the allegation, the investigation may be handled internally or referred to an outside expert, after consultation with general management or the Supervisory Board.

### **3.2 Process**

- The initial response to any allegation is to *take the report seriously*. The Integrity Officer or others who receive a complaint must not perpetuate the culture of diminishment around these serious issues.
- It is key to take all reasonable precautions to ensure protection of the alleged victim, including but not limited to removing the alleged victim and/or perpetrator from the situation, and offering access to professional psychological support.
- The Investigator may review relevant documents including electronic communications and takes steps to obtain and preserve those documents.
- The Investigator may interview parties involved, including relevant witnesses.
- The Investigator writes an Incident Report to document the investigation.

### **3.3 Confidentiality**

SKN will maintain the confidentiality of the complainant, the accused, and any witnesses, and each of their statements and records, to the fullest extent practicable and appropriate under the circumstances. SKN cannot promise absolute confidentiality but will conduct the investigation on a need-to-know basis.

#### **4. Discipline**

Disciplinary action will be taken against any SKN Affiliated or Associated Person found to have:

- Engaged in conduct that has violated SKN policies
- Contributed to the creation or continuation of a hostile work environment
- Failed to report an exploitation, abuse or harassment concern
- Intentionally made a false allegation; or
- Obstructed an internal investigation.

Disciplinary action may include, but is not limited to:

- Termination of all relations including employment, contractual or partnership agreements; and
- Reporting to authorities if it is suspected that a crime has been committed.

In addition to any disciplinary action taken by SKN, the SKN Affiliated and Associated Persons may be held personally liable for monetary damages if a civil action is filed against him or her.

#### **5. Closure**

SKN will inform the complainant, if known, of its determination as to whether SKN policy was violated. However, SKN will not disclose the nature of any disciplinary action that may have been taken because discipline is a confidential matter between SKN and the individual subject to corrective action. Discipline may take many forms, and those who raise concerns should not assume that disciplinary measures have not been implemented simply because SKN does not publicize such measures. Responsive action may include, for example, training, referral to counseling, or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay, termination, and/or pressing charges, as SKN believes appropriate under the circumstances.

The contact details at Kinderpostzegels, for reporting concerns or incidents are:

Stichting Kinderpostzegels Nederland  
Integrity Officer and/or Safeguarding Officer  
Schipholweg 97  
2316 XA Leiden  
The Netherlands

Phone +31 71 5259800  
Email: [hr@kinderpostzegels.nl](mailto:hr@kinderpostzegels.nl)

## Appendix A: Types of Misconduct

Unacceptable behavior under this policy includes, but is not limited to, the following types of misconduct:

- **Gender-Based Violence:** Under the Istanbul Convention, acts of gender-based violence are emphasized as resulting in 'physical, sexual, psychological or economic harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life.'
- **Sexual Harassment:** unwelcome or inappropriate advances, requests for favors, and other verbal, visual or physical conduct of a sexual nature, as well as offensive remarks about a person's sex or gender.
- **Sexual Exploitation:** an act or acts committed through non-consensual abuse or exploitation of another person's sexuality for the purpose of sexual gratification, financial gain, personal benefit or advantage, or any other non-legitimate purpose. It is the abuse of a position of vulnerability, differential power, or trust for sexual purposes.
- **Sexual Abuse:** any unwanted sexual or threatening act forced on the victim. This form of abuse is also often known as sexual assault or rape. Sexual abuse can include anything from unwanted touching to forced intercourse or forced sexual contact with another person.
- **Child Abuse:** verbal, physical, emotional or sexual abuse of a person under 18 years of age or above if legally higher in a specific country.
- **Disability Abuse:** when a person with a disability is abused physically, financially, sexually and/or psychologically due to the person having a disability.
- **Abuse of power:** misuse of authority is the commission of an unlawful act, done in an official capacity, in the course of performing work. The nature of NGO work creates an inherently unequal power dynamic—between those employed by or working with the NGO (which has resources and status), and the members of the communities where we work (who frequently have fewer resources and/or status).
- **Emotional or psychological abuse:** any behavior designed to hurt another person emotionally. Psychological abuse includes yelling, threats, shaming, humiliation, among other tactics.
- **Financial abuse:** when one person restricts access to money from another. This type of abuse includes actions like cutting off access to bank accounts, controlling where someone is allowed to work and preventing access to financial information.
- **Physical abuse:** any physical act or threat of a physical act designed to harm another person physically. This type of abuse includes actions like slapping, punching, assault or inappropriate physical contact, intimidating or hostile acts.
- **Verbal abuse:** occurs when an abuser uses words and body language with the intent to hurt another person. Verbal abuse includes put-downs, name-calling, insulting nicknames, derogatory statements, slurs, and unreasonable criticisms.
- **Visual abuse:** non-verbal communication that hurts others' dignity, for example displaying sexually suggestive posters, derogatory cartoons or drawings, sending inappropriate adult-themed gifts, leering, or making sexual gestures.
- **Elder abuse:** abuse perpetrated against an elder. This form of abuse often consists of financial, emotional and even physical abuse.
- **Spiritual abuse:** attacking another's belief system, denying access to a house of worship or forced participation in a cult.

## **Appendix B: Recruitment Sample Interview Questions**

### ***The child protection policy***

I expect you are aware of the child protection policy that the SKN network has regarding child protection?

Have you worked within an organization before that has had such a policy?

### ***Work environment***

Tell me about a time when you have been working with children or youth and have been concerned for their safety? If there has been one - what did you do? Why didn't you do anything? What concerns do you understand exist in relation to child protection and humanitarian staff working in the field?

### ***History***

Have you ever been accused of child abuse or been involved in a child abuse allegation as an investigator or witness? What happened with the case/how was the process managed?

Are you currently the subject of any misconduct investigation by an employer?

Are criminal charges pending against you, or are you the subject of any inquiry or investigation by a law enforcement agency in this or any other state, territory or country?

### ***Understanding the risk***

What concerns do you understand exist in relation to child protection and humanitarian staff working in the field?

### ***Applying the policy***

- You realize your employee is seeing prostitutes, possibly under aged ones - how do you react to the situation?
- You suspect one of your supervisors of abusing his or her authority for personal gain while visiting a community - how do you react to the situation?
- You are asked to investigate an alleged violation of the policy; how would you proceed?

### **Sample Reference Questions**

SKN has a Safeguarding Policy which governs staff behavior in relation to beneficiaries, resources and professional and private behavior while working for SKN.

- Has this person either managed or been involved in any staff conduct issues relevant to the information above? (Formally or informally)
- If there were any staffs conduct issues - either concerning behavior by (s)he or by the staff (s)he managed - which were not dealt with, why was this and how did (s)he handle the situation (if applicable)?
- Has the person resigned from or otherwise left employment (e.g., settlement or agreement) while allegations of misconduct were pending or under investigation?
- SKN works with vulnerable groups, including women and children. Are you confident in the applicant's suitability to work with these groups?