



## **COCD Safeguarding and Counter Human Trafficking Policy**

### ***Purpose***

This Policy, together with Cross Over Community Development (COCD) Core Values (insert link), the COCD Child Safeguarding Protocol and Safeguarding Reporting and Resolution set out the commitments of COCD to safeguarding and are fundamental to our mission and values.

Safeguarding is how we make COCD safe for the children and adults who live in the communities where we operate. It refers to our individual and collective responsibility to prevent and respond to actions and omissions by our Representatives, whether deliberate or inadvertent, that place children and adults in the communities that we serve at risk of any kind of harm, abuse, or exploitation, including Human Trafficking.

### ***Scope***

This Policy is intended to cover all aspects of 'COCD activities. It applies to all COCD Representatives (including employees, volunteers, interns, consultants, and Advisors), as well as Partners and Program Visitors.

COCD Representatives must demonstrate the highest standards of behavior and conduct, both in their private and professional lives, 24 hours a day, and 7 days a week. The Policy applies to Program Visitors while visiting COCD Programs or attending COCD events.

COCD partners are required to comply with this policy or their own substantially similar policy when implementing part of a COCD program. Others are required to comply as per donor conditions and when provided with access to COCD program participants or their data.

### ***Policy Statement(s)***

#### ***Upholding Our Legal Duties and Children's Rights***

COCD will comply with all applicable laws and donor requirements concerning child protection, child welfare, nondiscrimination, human trafficking, and the prevention of sexual exploitation and abuse. In addition, we affirm our commitment to the Inter-Agency Standing Committee's Six Core Principles on Protection from Sexual Exploitation and Abuse, the COCD Child Safeguarding Protocol. Where the COCD Safeguarding Policy standard is higher than the applicable law, the COCD Policy shall be followed.

COCD is committed to giving primary consideration to the best interests of children and children's rights in all actions we take related to preventing and responding to safeguarding violations. These rights include the child's right to life and development, the child's right to be heard/participate, and the child's right to non-discrimination as set forth in the United Nations Convention on the Rights of the Child. COCD recognizes that certain individuals are at increased safeguarding risk, including children with disabilities, and we will take additional care to ensure that we protect their rights.

#### ***Behavioral Guidelines and Prohibited Conduct***

COCD Representatives and Program Visitors will review and adhere to the Safeguarding

Behavioral and Conduct Guidelines in all their interactions with children and adults, including program participants and community members. Consistent with these materials, COCD prohibits all forms of Abuse, Exploitation, Human Trafficking, and Discrimination against child and adult program participants and community members, including, without limitation, the following:

- Physical Abuse, Emotional Abuse, or Neglect of children.
- Engaging in any form of sexual activity with anyone under the age of 18 regardless of the age of consent locally. This includes grooming a child for sexual purposes. Ignorance or mistaken belief in the age of a child is not a defense.
- Engaging in sexual activity with an adult program participant or the caretaker of a child program participant, except in the circumstance that such relationship predates one or both parties' involvement with COCD. Representatives are required to disclose any pre-existing relationships to their line manager.
- Exchanging money, employment, goods, or services for any form of sexual activity, including sexual favors or other forms of humiliating, degrading, or exploitative behavior. This includes exchanging assistance that is due to people participating in, or eligible for, COCD Programs or buying or procuring sex acts from anyone at any time even when commercial sex transactions would be legal in the jurisdiction where they would occur.
- Engaging or attempting to engage in any form of sexual abuse or sexual harassment toward any program participants and community members, including any child or adult.
- The use of forced labor or engaging anyone under the age of 18 in any form of illegal or harmful child labor.
- The recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of any activity prohibited by this policy.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents or engaging in other activities that contribute to Human Trafficking.
- Discriminating against program participants or community members, including any child or adult, on any basis, including but not limited to race, ethnicity, religion, sex, sexual orientation, gender identity, disability, or any other basis prohibited by federal, state, or local law.

### *Essential Standards*

Per the standards set out in the COCD Safeguarding Protocol, COCD will adopt, maintain, and adhere to agency-wide procedures with respect to awareness and training of staff, prevention, reporting, and incident response.

To ensure that safeguarding considerations are always prioritized, if any other agency Policy or Procedure appears to conflict with this Policy, this Policy shall prevail.

### *Reporting and Incident Response*

All COCD Representatives and Visitors must report concerns, suspicions, and known violations of this Policy or its Procedures - no matter how trivial the issue may seem -

within 24 hours of becoming aware of the concern. Reports may be made anonymously. Reporting pathways include:

- By phone:
  - (937) 559-7195
  - Montgomery County Children Services hotline at (937) 224-KIDS (5437)
- By email: [info@crossovercd.org](mailto:info@crossovercd.org)
- In person: Speak with Executive Director, Catherine Bitwayiki or Education Director, Jessica Ashe

Where Partners have safeguarding reporting requirements under their agreements with COCD, they must also report concerns, suspicions, and known violations of this Policy through the channels noted above.

Representatives and Visitors reporting concerns or complaints will be protected from any form of retaliation or negative employment consequences, per COCD's Reporting and Resolving Policy Violations or Other Concerns Policy. Failure to report and/or knowingly reporting false information will be considered a breach of this Policy and may result in disciplinary action.

Information concerning suspected or reported safeguarding incidents should be treated as Confidential as defined in the Data and Information Classification Policy. Personal details concerning individuals involved in safeguarding incidents is Sensitive Personal Information, as defined in the Personal Information Protection Policies. The collection and use of this information is governed by the relevant provisions of those policies.

All safeguarding concerns, suspicions, and incidents as well as any potential violations of this Policy will be thoroughly examined and where needed, investigated by COCD senior leadership. Where a Representative leaves COCD prior to the commencement or completion of a safeguarding investigation and any subsequent disciplinary process, the process will continue, and a clear outcome will be recorded.

### ***Ensuring a Survivor-Centered Approach***

COCD is committed to safeguarding approaches that put survivors at the heart of this Policy and related Guidance or Procedures. This means that the safety, dignity, and well being of the survivor are the primary considerations in all steps COCD takes to prevent and respond to concerns of safeguarding policy violations. Survivors have the right to decide whether they wish to be involved in any investigation. If desired, and with the informed Consent or Assent of the survivor, survivors will be referred to publicly available support services. Support will be provided to survivors of safeguarding policy violations regardless of status or outcome of an investigation, including when a survivor does not wish to participate in an investigation.

- [Montgomery County Child Abuse Bureau](#)
- [The Care House](#)

### ***Zero-Tolerance***

COCD has a zero-tolerance approach to Abuse, Exploitation, Human Trafficking, Harassment,

and Discrimination against program participants and community members by any of our Representatives. Failure to adhere to the requirements set out in this Policy is a serious disciplinary breach and will result in disciplinary action up to and including termination of employment.

For Partners, violation of this Policy or their own substantially equivalent policy, failure to comply with contractual reporting requirements, and failure to take appropriate corrective action may result in suspension or immediate termination of the agreement and may also result in the party being deemed ineligible for future agreements with COCD.