STREET CHILD OF NEPAL

BENEFICIARY FEEDBACK MECHANISMS

Beneficiary Feedback Mechanisms (BFMs) for Street Child of Nepal Programmes

This Beneficiary Feedback Mechanism (BFM) policy rests on the assumption that serious concerns will only be raised when trust in the ability of an organisation to listen and respond appropriately has been established. It aims to effectively close the feedback loop through contextualised, inclusive and accessible BFMs that are well resourced and contribute towards increased community buy in and project ownership amongst project participants.

Street Child of Nepal institutes project-specific BFM tools, providing sufficient platforms for project participants to share their input on all aspects of the project, enabling responsive project adaptations. They promote a process of dialogue which ensures engagement, accountability and transparency within all our projects; regular and rigorous evaluation of feedback underpins this process.

Our BFMs are designed for flexibility and can be adjusted as required, throughout the project lifetime, to address immediate and emergent issues as flagged by project participants.

Beneficiary Profile

BFMs are currently structured to reflect the needs of direct and indirect beneficiaries on Breaking the Bonds and Marginalised No More including Musahar girls aged 10 to 19, Musahar boys aged 10 to 19, Community Management Committee members (majority of whom are Musahar women) and Musahar community members.

The districts where the two projects and BFMs are being implemented, have the lowest educational indicators in the country. Further, a mere 3.8% of Musahar women and girls are literate and 85% are unable to read or write at all. Therefore, our BFMs are tailored to effectively function in this low-literacy context.

Coordination for Delivery

Overall delivery of BFMs are led by Street Child of Nepal Programmes and Monitoring and Impact Assessment team with Social Workers from local partner organisations responsible for implementation on the ground.

When Street Child of Nepal enter into a working agreement with a local partner, a Memorandum of Understanding (MoU) is signed which outlines the responsibilities and requirements of both parties to deliver BFMs throughout the programme. Within this agreement, Street Child of Nepal is responsible for providing technical support in terms of orienting and training partner staff on BFM policy, principles and practices. Partners are then required to ensure effective implementation of these processes across the programme, including assistance in data collection and results sharing. Street Child of Nepal's commitment to strengthening partner capacity is demonstrated by a partnerships framework which recognises the critical role partners have in implementing localised, contextualised BFMs.

Guiding Principles

Street Child of Nepal's use of BFMs is guided by principles established within Bond's Feedback and Accountability Learning Group (FALG) paper - Eight principles for building trust through feedback. However, although Street Child of Nepal's BFM principles are based on those created by FALG they have, in alignment with Principle 1, been adapted to meet the context. Finally, it is important to state that the principles below are interdependent and interrelated, and therefore non-linear and non-hierarchical.

1. Context-Specific

Street Child of Nepal's use of feedback mechanisms is contextually appropriate with consideration given to the social, cultural and gender norms of our beneficiary groups as well as the wider context. Community ownership is achieved through consultations from the design phase which to ensure mechanisms are practical and utilised. Heterogeneity and power disparities within households are addressed through the use of socio-culturally adapted mechanisms which create forums for open discussion. Marginalised and vulnerable groups are not only included but in fact positioned as the fundamental participants and beneficiaries of all Street Child of Nepal programmes, and therefore the target of all programme outputs and impacts. Educational, linguistic, technological and financial barriers to reporting and raising complaints are responded to through mechanisms which use verbal, visual, paper-based and inexpensive channels. Preferences for reporting and response are accepted and encouraged through a variety of mechanisms which allow reporting outside of predefined channels and predetermined opportunities. Finally, relationships have been and will continue to be built with a range of organisations representing marginalised people in order to build a mechanism which will support reporting of issues outside of our organisational skillset and programmatic remit.

2. Inclusive and Accessible

Street Child of Nepal's use of feedback mechanisms is inclusive and accessible, regardless of gender, age, disability or any other dimension of diversity which may inhibit a participant or beneficiary's ability to raise complaints and seek redress. Mechanisms are designed to ensure gender equality taking into account needs, risks and vulnerabilities through the provision equitable channels which address gendered issues such as sensitivity, privacy and confidence. Multiple mechanisms and channels are used to ensure that feedback is collected from a diverse range of stakeholders with different capacities, languages and constraints. Safety and ease-of-use are considered throughout the mechanism to ensure that everyone involved feels and is respected. A combination of proactive and reactive channels are employed to both directly solicit feedback and allow it to occur spontaneously and naturally. Finally, informal and traditional feedback mechanisms based on personal relationships are, and will increasingly be, accepted avenues to raise concerns.

3. Empowering

Street Child of Nepal's use of feedback mechanisms are people-centred through an equitable process which values participant and beneficiary perspectives regardless of involvement in order to enhance a sense of agency and ownership of concerns raised and solutions found. A cross section of programme participants, indirect beneficiaries and representative interest groups was consulted during the selection and design of the feedback mechanisms with particular emphasis based on channels they deemed important to increase use and effectiveness. Furthermore, the rights of participants and beneficiaries to report outside of predefined channels and predetermined opportunities, or not at all, are respected within a mechanism which treats all channels of feedback equally. Finally, regularly and consistently informing participants and beneficiaries of Street Child of Nepal's remit, expected and accepted staff behaviour, and delivery limitations after each cohort throughout the programme will foster agency and result in targeted feedback over time.

4. Impartial

Street Child of Nepal's use of feedback mechanisms is credible and sustained through the assurance that issues raised will be investigated thoroughly and with impartiality. The power and incentive systems that can affect programme staff in forming unbiased judgements have been examined to provide a clear a transparent process for the investigation of safeguarding concerns. An organisational culture that encourages the disclosure of conflicts of interest has been fostered through raising staff awareness of its importance and full-back or parallel channels which designated persons responsible for reporting can use when a perceived conflict of interest occurs have been designed in order to enable impartiality. Finally, multiple mechanisms and channels which support feedback through a variety of different modalities and systematic gathering and review of feedback ensure impartial oversight.

5. Closing the Feedback Loop

Street Child of Nepal's use of feedback mechanisms enables a two-way channel of communication through the systematic acknowledgement and answering of feedback which maintains confidentiality, responds promptly, investigated transparently, and consistently communicates closes the feedback loop. Transparency over feedback raised builds confidence in the mechanism and creates an environment which elicits further feedback from less confident and more marginalised groups. When feedback of a confidential nature is raised, it is appropriately acknowledged and addressed with sensitivity within investigation procedures which are clearly documented, shared and understood by participants and beneficiaries in order to build trust. Awareness about available mechanisms, established timelines and procedures for responding alongside reports of changes made as a result of feedback are regularly communicated to ensure that feedback continues to be put forward. Finally, feedback is regularly consolidated and shared across relevant stakeholders in order to incorporate changes into programme design, implementation and practice and to shape future interventions.

6. Collective Responsibility

Street Child of Nepal's use of feedback mechanisms is responsive to collective responsibility and Do No Harm commitments through a design in which appropriate and timely referrals are used to ensure that marginalised and vulnerable participants and beneficiaries are able to report concerns without risk of stigma, retribution or retaliation. When feedback is shared with the community it is handled with a do no harm approach in which confidentiality and anonymity are essential in order to protect the individuals identity. Likewise, when allegations of misconduct are raised, protection and respect of confidentiality and anonymity are afforded to all parties in order to retain trust, credibility and approachability. Finally, where coordinated mechanisms for referrals are not currently established, analysis of the operating context which map present state and non-state actors with their capacity to respond and risks associated with referring sensitive cases to them will be conducted.

7. Appropriately Resourced

Street Child of Nepal's use of feedback mechanisms is responsive to collective responsibility and Do No Harm commitments through a design in which appropriate and timely referrals are used to ensure that marginalised and vulnerable participants and beneficiaries are able to report concerns without risk of stigma, retribution or retaliation. When feedback is shared with the community it is handled with a do no harm approach in which confidentiality and anonymity are essential in order to protect the individuals identity. Likewise, when allegations of misconduct are raised, protection and respect of confidentiality and anonymity are afforded to all parties in order to retain trust, credibility and approachability. Finally, where coordinated mechanisms for referrals are not currently established, analysis of the operating context which map present state and non-state actors with their capacity to respond and risks associated with referring sensitive cases to them will be conducted.

What BFMs does Street Child of Nepal use?

Street Child of Nepal uses multiple entry points to collect feedback, aiming to overcome barriers that project participants might experience within their existing contexts. These mechanisms are outlined in the table below which also details how and when mechanisms are used, what their intended impact is and who implements them.

Mechanism	Implementation	Output and Outcome	Delivery Staff	COVID-19 (Remote) Delivery
Surveys	Surveys and questionnaires are structured feedback mechanisms in which community educators/Transition Advisors examine programme outputs and outcomes through one-to-one discussion. Surveys and questionnaires are used throughout the programmes – at baseline, midline and end-line – in order to measure the perspectives, experiences and understandings of participants, beneficiaries and stakeholders and assess programme impacts.	Surveys and questionnaires are feedback mechanisms which solicit responses from selected respondents on specific topics identified as relevant. The use of surveys and questionnaires creates community ownership through a people-centred process of consultation at the design phase of the programme. As a BFM, surveys and questionnaires address linguistic, safety and usability issues while also acting as both an opportunity to inform participants and beneficiaries of programmatic remit, behaviour and limits; and collect data for consolidated reporting to stakeholders.	Aasaman Nepal Community Educators and Transition Advisors conduct surveys and questionnaires and Street Child of Nepal Education Officers analyse the data and provide response and action recommendations	Phone surveys are carried out with support from Community Management Committee Focal Points. Where scenario is favourable for field travel, surveys are conducted by staff using PPE, employing social distancing and in communities with low transmission rates. In high risk areas, this mechanism is only used if required data cannot be obtained alternatively. Adherence to Street Child of Nepal's Remote Communication Standard Operation Procedure (SOP) is required.
Focus Group Discussions	Focus group discussions (FDGs) are a semi-structured feedback mechanism in which Community Educators/Transition Advisors examine programme outputs and outcomes through generating group discussion. FDGs are used twice per programme – at baseline and end-line – in order to measure the perspectives, experiences and understandings of participants, beneficiaries and stakeholders and assess programme impacts.	FGDs are a feedback mechanism which solicit responses from selected respondents on specific topics identified as relevant with emphasis given to those focused on by the group. The use of FGDs creates community ownership through a people-centred process of consultation at the design phase of the programme. As a BFM, FGDs act as an effective platform to build relationships; inform participants and beneficiaries of programmatic remit, behaviour and limits; and report changes made as a result of feedback. Furthermore, FGDs act as a parallel channel to surveys and questionnaires and collect data for consolidated reporting to stakeholders.	Aasaman Nepal Community Educators and Transition Advisors conduct focus group discussions and Street Child of Nepal Education Officers analyse the data and provide response and action recommendations.	FGDs will be conducted by staff using PPE, employing social distancing, in communities with low transmission rates and with groups of no more than 6 participants only if and when data from this mechanism is required and cannot be obtained alternatively.
Suggestion Box	Suggestion boxes are a semi-structured feedback mechanism in which Social Workers manage programme issues through collecting anonymous comments, concerns and complaints. Suggestion boxes are used throughout the programme implementation (and hopefully beyond) in order to acknowledge and respond to feedback from participants, beneficiaries and stakeholders.	Suggestion boxes are a feedback mechanism which gathers unsolicited feedback from random respondents who have particular comments, concerns, or complaints. The use of suggestion boxes addresses sustainability, confidentiality and technological issues in a mechanism which elicits further feedback through a process of systematic acknowledgement and response. As a BFM, suggestion boxes allow and encourage participants and beneficiaries to practice an anonymous feedback preference; provide personalised referrals to respondents; and collect case studies for consolidated reporting to stakeholders.	JWAS Social Workers manage suggestion boxes and communicate any collected to Street Child of Nepal Project Managers to analyse and provide response and action recommendations.	Projects are unable to use Suggestion Boxes to collect feedback due to project activities being pivoted to remote implementation.

Mechanism	Implementation	Output and Outcome	Delivery Staff	COVID-19 (Remote) Delivery
Counselling Desk	Counselling desks are an unstructured feedback mechanism in which Social Workers manage programme issues through providing an opportunity for face-to-face discussions at the office, within predetermined weekly hours. Counselling desks are used throughout the programme implementation in order to acknowledge and respond to feedback from participants and beneficiaries.	Counselling desks are a feedback mechanism which gathers unsolicited feedback from random respondents who have particular comments, concerns or complaints. The use of counselling desks addresses linguistic, sensitivity and usability issues in a mechanism which elicits further feedback through a people-centred process of systematic acknowledgement and response. As a BFM, counselling desks allow and encourage participants and beneficiaries to practice a face-to-face feedback preference; provide personalised referrals to respondents; and act as a fall-back channel to suggestion boxes.	JWAS Social Workers manage counselling desks and communicate any feedback to Street Child of Nepal Project Managers to analyse and provide response and action recommendations.	Counselling desks are conducted remotely over the telephone where possible, with assistance from Community Management Committee Focal Point. In communities with low transmission rates, these are delivered by staff using PPE, employing social distancing. Security scenario is determined based on Government of Nepal guidelines. Adherence to Street Child of Nepal's Remote Communication Standard Operation Procedure (SOP) is required.
Communication Boards	Communication boards are a semi-structured feedback mechanism in which Social Workers manage programme issues through informing, sharing and responding. Communication boards are used throughout programme implementation (and hopefully beyond) in order to regularly inform participants and beneficiaries of feedback policies and procedures; share relevant feedback collectively; and respond to feedback transparently.	Communication boards are a feedback mechanism which informs, shares and responds to feedback from respondents who have particular comments, concerns or complaints. The use of communication boards creates community ownership through a process which regularly informs participants and beneficiaries of programmatic remit, behaviour and limits. As a BFM, communication boards address issues of confidentiality and sustainability in a mechanism which elicits further feedback through a process of systematic acknowledgement and response and reports changes made as a result of feedback.	JWAS Social Workers manage communication boards and communicate any feedback to Street Child of Nepal Project Managers to analyse and provide response and action recommendations.	Communication boards will be implemented as intended with no adaptations necessary.
House Visits	House visits are an unstructured feedback mechanism in which Social Workers respond to programme issues through providing an opportunity for face-to-face discussions in the respondents home, within agreed hours. House visits are used throughout the programme implementation in order to acknowledge and respond to feedback from participants and beneficiaries. Safeguarding risks associated with this mechanism are managed through continuous appropriate practice trainings.	House visits are a feedback mechanism which respond to feedback, and also further solicit it, from respondents who have particular comments, concerns or complaints. The use of house visits addresses physical accessibility, usability, linguistic, sensitivity, safety and confidentiality issues through a people-centred process which builds relationships and respects the use of a traditional feedback channel. As a BFM, house visits allow and encourage participants and beneficiaries to practice a face-to-face feedback preference; act as a fall-back channel to communication boards; and an opportunity to inform participants and beneficiaries of programmatic remit, behaviour and limits.	JWAS Social Workers conduct house visits and communicate any feedback to Street Child of Nepal Project Managers to analyse and provide response and action recommendations.	House visits will only be conducted where absolutely necessary and when approved by Project Coordinators. Beneficiaries and their families will instead be encouraged to come to centres where staff will use PPE, and employ social distancing in communities with low transmission rates.

Mechanism	Implementation	Output and Outcome	Delivery Staff	COVID-19 (Remote) Delivery
Informal Feedback	Informal feedback is unstructured feedback in which participants and beneficiaries decide to provide feedback through channels which are not predefined or determined. Informal feedback is collected throughout the programme, and equally valued with all other feedback, in order to respect, acknowledge and respond to feedback to participants and beneficiaries.	Informal feedback is a feedback mechanism which gathers unsolicited feedback from random respondents who have particular comments, concerns or complaints. The use of informal feedback creates community ownership through a process which respects the rights of participants and beneficiaries to provide feedback through informal and traditional channels. As a BFM, informal feedback addresses linguistic, usability and sensitivity issues in a mechanism which provides a parallel channel that allows and encourages participants and beneficiaries to use whatever practice they prefer.	JWAS Social Workers remain receptive to informal feedback and communicate any received to Street Child of Nepal Project Managers to analyse and provide response and action recommendations.	Informal feedback will continue as standard through Community Management Committee Focal Points who will share information to Social Workers remotely where field travel is not possible.

ANNEX

The policies provided below guide our **Counselling Desks and Communication Boards** which warrant specific delivery methods for effective and appropriate implementation. **The Feedback Categorisation table which follows is a supporting document designed for the implementation of these and all other BFMs. Our Remote Communication Standard Operating Procedure (SOP) which concludes this annex is cross-cutting and applicable to our overall BFM procedures during COVID-19**.

1.1 Counselling Desk Policy

Counselling desks are an unstructured, beneficiary-led feedback mechanism adopted by Street Child in which Social Workers manage programmatic and safeguarding issues through the provision of predetermined weekly hours in which beneficiary issues are acknowledged, reported and responded to in a face-to-face forum. The use of Counselling Desks provides a people-centered process which overcomes illiteracy, responds sensitively and respects beneficiary rights to report unsolicited feedback. This mechanism is designed to elicit further feedback through a process of reactive acknowledgement and response, managing beneficiaries personably.

How do Counselling Desks work?

Counselling desks are predetermined hours in which direct and indirect beneficiaries are able to approach Social Workers with verbal, sensitive and unsolicited feedback. Social Workers and Centre Management Committee (CMC) members will receive an orientation of this policy and its supporting documents, which will then be trickled down through orientations delivered by both to beneficiaries, covering Counselling Desk policies, procedures an active hours all of which will be permanently available on Communication Boards.

Workers will allocate one hour per centre, per week for Counselling Desks to be delivered and decide on this hour collectively with the beneficiaries of each centre through discussions. The active Counselling Desk hour for each centre may vary dependent upon need and change when necessary but must always be clearly communicated to beneficiaries to ensure access. Counselling Desk active hours may be changed in response to (i) multiple beneficiary requests, (ii) programme activity changes but their District Coordinator must always be made aware of any changes when made. CMC members will be responsible for ensuring beneficiaries are aware of their centre's hour and that Social Workers consistently conduct them.

COUNSELLING TIPS

- Make Feedback provider feel comfortable sharing their feedback.
- Listen patiently and let the feedback provider completer their say.
- Be as much polite as you can.
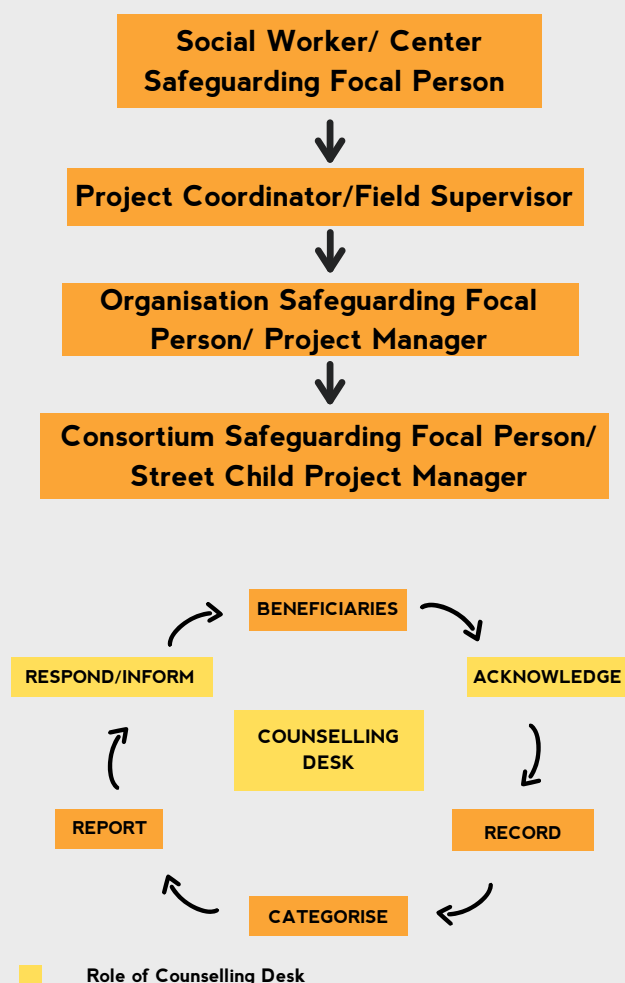- Ensure you react and respond sensitively.

Social Workers are responsible for conducting Counselling Desks in a public-private setting – visible but not audible – maintaining confidentiality between themselves and the beneficiary while also informing them that the feedback they provide will not remain only with Social Workers but will be shared with colleagues. In these meetings Social Workers will be responsible for acknowledging and recording feedback on a Counselling Desk Form which will then be shared with Project Coordinators.

Counselling Desk Dos and Don'ts

Do's	Don'ts
• Make beneficiaries feel comfortable. • Speak politely, softly and clearly. • Listen and give full attention. • Stay calm reassuring and non-judgmental. • Ask open ended questions. • Use simple and understandable language. • Thank them for reaching out and trusting.	• Deny the beneficiaries' feeling. • Force beneficiaries to give details. • Ask question in direct and embarrassing way. • Threaten them with the consequences. • Become immersed in the situation. • Make promises that you cannot keep. • Don't impose your situation on them.

Counselling Desks Feedback

The feedback received in Counselling Desks may vary but can be broadly categorised as environmental, programme quality or safeguarding. Environmental refers to classroom, family or community issues; programme quality refers to delivery, content and staff issues; and safeguarding refers to sensitive issues. Feedback can also be categorised by risk and will be escalated accordingly to different members of staff as illustrated here. Feedback concerning the Accelerated Learning Programme will be handled by Aasaman and SC's Education team and feedback concerning the Livelihood Support Programme will be handled by SAHAS and SC's Livelihood team while all safeguarding feedback will be handled by Organisational and SC Safeguarding Focal Points.

Social Worker/ Center Safeguarding Focal Person
↓
Project Coordinator/Field Supervisor
↓
Organisation Safeguarding Focal Person/ Project Manager
↓
Consortium Safeguarding Focal Person/ Street Child Project Manager

BENEFICIARIES → ACKNOWLEDGE → RECORD → CATEGORISE → REPORT → RESPOND/INFORM → BENEFICIARIES

COUNSELLING DESK

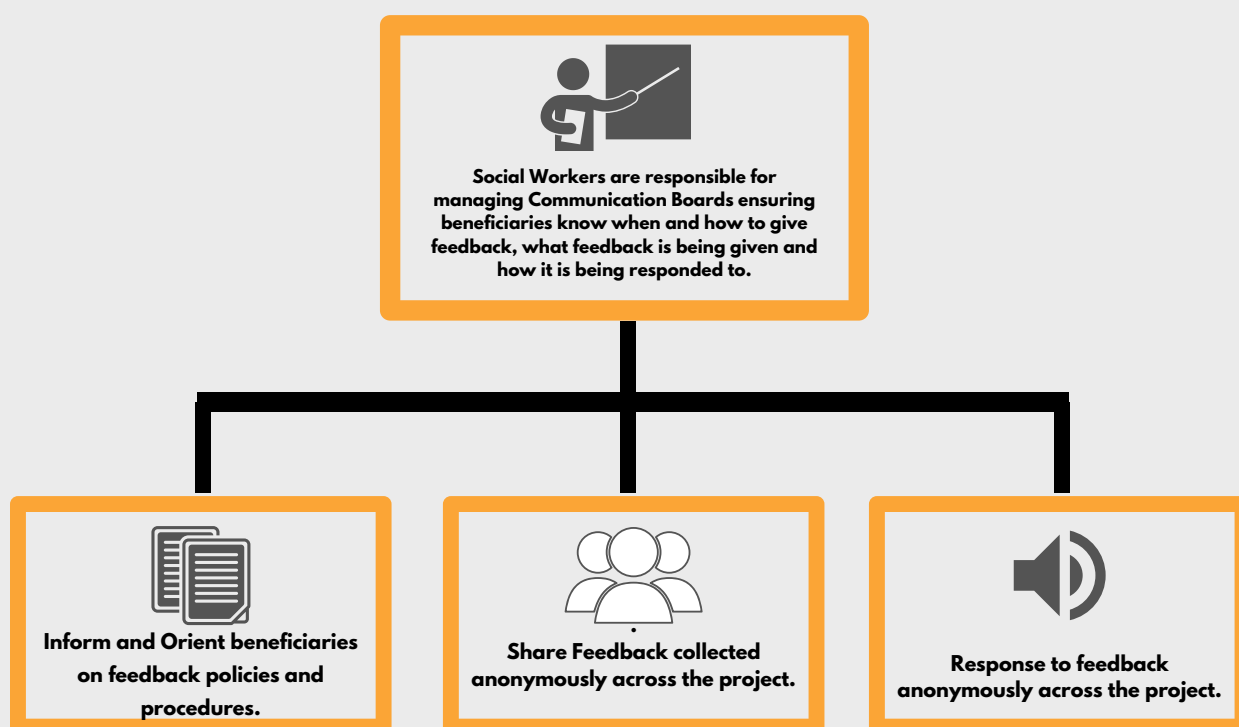Role of Counselling Desk

1.2 Communication Board Policy

Introduction to Communication Boards

Communication Boards are a semi-structured feedback mechanism in which Social Workers manage programmatic issues through informing, sharing and responding to feedback from beneficiaries who have particular comments, concerns or complaints. The use of Communication Boards creates community ownership through a process which informs beneficiaries of feedback policies and procedures, shares relevant feedback anonymously and responds transparently. This mechanism is designed to elicit further feedback through a process of systematic acknowledgement and response, reporting actions taken in response.

How do Communication Boards work?

Communication Boards are equally divided according to its three aims to inform, share and respond. The first section of the boards will inform beneficiaries of feedback policies and procedures through a combination of clearly worded policies written in Maithili and illustrative procedure diagrams, for which Social Workers will be responsible for orienting beneficiaries. The second section of the boards will share feedback received from across the project anonymously in a dialogical process in which Social Workers are responsible for explaining the comment, concern or complaint and the reporting policy and procedure. The final section of the boards will respond to feedback received in a process wherein responses to feedback received from across the project are shared anonymously in a dialogue in which Social Workers are responsible for explaining the comment, concern or complain; the reporting policy and procedure; and the response rationale.
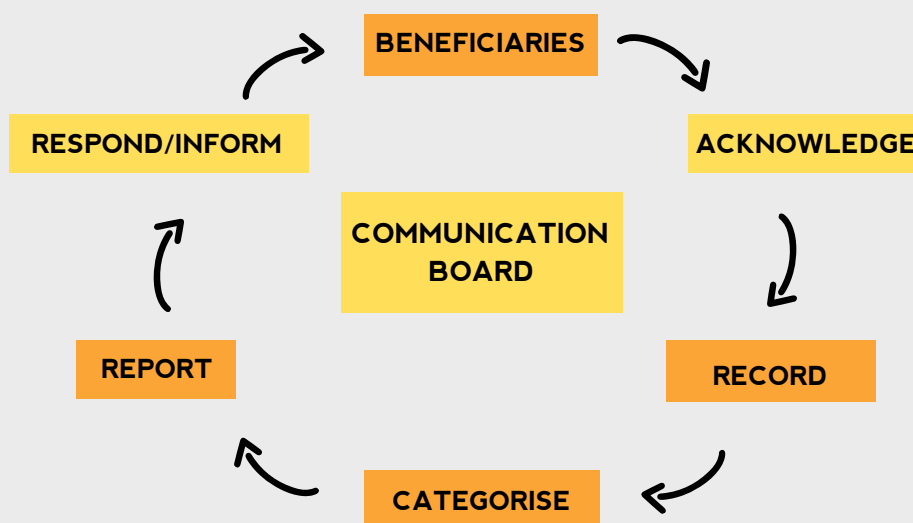
COMMUNICATION BOARD

Social Workers are responsible for managing Communication Boards ensuring beneficiaries know when and how to give feedback, what feedback is being given and how it is being responded to.

Inform and Orient beneficiaries on feedback policies and procedures.

Share Feedback collected anonymously across the project.

Response to feedback anonymously across the project.

Social Workers are responsible for maintaining and updating the information on their Communication Boards while Centre Management Committee (CMC) members are responsible for ensuring their accessibility and safe storage. Social Workers and CMC members will receive an orientation of this policy and its supporting documents, which will then be trickled down through orientations delivered by both to beneficiaries, covering policies written in Maithili and procedures illustrated in diagrams. Finally, the Organisational Safeguarding Focal Point will be responsible for deciding what feedback collected and responded to is shared on the Communications Boards, anonymising and circulating these to all Social Workers who will then copy the content onto the boards and conduct discussions with beneficiaries.

Communication Boards Feedback

The feedback displayed on Communications Boards may vary but can be broadly categorised as environmental, programme quality or safeguarding. Environmental refers to classroom, family or community issues; programme quality refers to delivery, content and staff issues; and safeguarding refers to sensitive issues. Feedback can also be categorised by risk and will be escalated accordingly to different members of staff as illustrated here. Feedback concerning the Accelerated Learning Programme will be handled by Aasaman and SC's Education team and feedback concerning the Livelihood Support Programme will be handled by SAHAS and SC's Livelihood team while all safeguarding feedback will be handled by Organisational and SC Safeguarding Focal Points.

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Project Coordinator/Field Supervisor
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BENEFICIARIES

ACKNOWLEDGE

RESPOND/INFORM

COMMUNICATION BOARD

RECORD

REPORT

CATEGORISE

Role of Communication Board

1.3. Feedback Categorisation

Nature	Risk		
	Low (Project Coordinators and/or Field Supervisor)	**Medium** (Organisation Project Manager)	**High** (Street Child Project Manager)
Environment (Classroom, Family, Community)	Comparing Socioeconomic Status of one Beneficiary to another; Inadequate Classroom Space	Exclusion of Beneficiaries of Staff based on Age, Disability, Sexuality or Religious/Political Beliefs.; Staff Discrimination Against or For Beneficiaries; Disobedience and Disciplinary Behaviour in Class	Staff Name Calling Beneficiaries (e.g. Langade, kaali etc); Staff Insulting Beneficiaries based on Learning Ability
Programme Quality (Delivery, Content, Staff)	Lack of Staff Punctuality	Limited Beneficiary Understanding of Content; Lack of Regular Student Assessment; Unvaried Teaching Methods; Inequitable Teaching Methods	Limited Beneficiary TaRL Level Progression; Improper/Inadequate knowledge and use of TaRL pedagogy
Safeguarding	Use of Culturally Inappropriate Language in Centre; Peer-to-Peer Name Calling (e.g. Langade, kaali etc); Inter-Peer Insulting based on Learning Ability; Beneficiary use of Abusive and Inappropriate Language	Physical, Sexual or Emotional Violence; Sexting; Contacting and Meeting with Beneficiaries Outside of Designated Programme time for non-programme reasons	Sexual Interaction between Staff and Beneficiaries; Use of Sexualised Language/Behaviour with Beneficiaries; Staff Consumption of Alcohol or Illicit Drugs when at work; Evidence of Possible Abuse or Neglect; Staff Use of Physical or Humiliating Punishment; Staff Insulting Beneficiaries based on Learning Ability; Threatening Phone Calls or Messages sent to Beneficiaries; Staff use of Abusive and Inappropriate Language; Peer bullying

1.4. COVID-19 Remote Communication Safeguarding Standard Operating Procedure

1. Objective

Working with girls over the phone or the internet is a high-risk activity. Our objective is to ensure that all staff, volunteers and beneficiaries are as safe using two-way communications as they are when working in person.

All staff members and volunteers working with children and vulnerable adults via phone or online are to be familiar with this Standard Operating Procedure. Unless they have thoroughly familiarised themselves with the document, individuals should not engage in this type of communication with girls. Proof of knowledge of the Standard Operating Procedure should be documented in writing.

2. Related policies

This document is a part of a suite of safeguarding policies and procedures. It must be used in conjunction with the following documents:

- Safeguarding Policy
- Child Protection Policy
- Whistleblowing policy
- Fraud, Bribery and Corruption Policy
- Finance Policy
- Procurement Policy
- Conflict of Interest Policy
- Data Protection policy
- IT Policy
- HR Policy
- Code of Conduct
- Complaints Handling Mechanism
- Reporting and Referral Mechanism
- Any additional protection policies developed globally or locally by Street Child of Nepal

All staff members, volunteers and associated personnel must be familiarised with these additional materials prior to working in any capacity with the beneficiaries. In addition, it is recommended that anyone engaging with beneficiaries over the phone or the internet must be submitted to all the HR processes that are conducted for those engaging in work with a child or vulnerable adult in person, including criminal record checks and reference checks.

Code of Conduct

1. Purpose

Street Child's code of conduct ("Code of Conduct") has been prepared for Street Child of Nepal ("Street Child") to promote ethics, honesty and professionalism within the organisation and among its employees. The organisation believes that the actions of all employees affect the entire organisation; thus, any employee should operate in the organisation's interests within legal limits and is accountable for preventing loss of the organisation's interests. The organisation expects all employees to abide by this Code of Conduct in carrying out their duties so as to preserve public trust and ensure the organisation's sustainable growth and development.

2. Scope

The measures outlined in this Code of Conduct are applicable to all employees in the course of their employment with Street Child (including, but not limited to, work at Street Child's office or at any project site).

3. Responsibility

The Chief Executive Officer and Country Director of Street Child are responsible for directing and monitoring the procedures outlined in this Code of Conduct. All managers are responsible for adhering to the procedures outlined in this Code of Conduct for their role, ensuring that employees are familiar with this Code of Conduct and providing advice and support to the employees reporting to them.

4.1 Ethics and Integrity

Street Child's standards of conduct are not confined to legal compliance. Each employee of Street Child is obliged to carry out their duties with ethics and integrity and avoid any activity that would be considered incompatible with such ethics and integrity. This includes: Carrying out all duties with integrity and truthfully recording all organisational activities. Ensuring that all information is recorded, filed and treated with the appropriate level of confidentiality when carrying out duties, while respecting the assets and intellectual property of the organisation as well as of all donors, partners and beneficiaries of the organisation. Ensuring that all accounting ledgers, invoices, records, accounting entries, capital and assets are securely catalogued and safeguarded to ensure that all organisational transactions are recorded accurately and transparently. It is strictly forbidden to fabricate, falsify or create misleading claims or to fabricate or falsify any accounting entries, records, financial reports or any other related documents. It is also strictly forbidden to intentionally hide or disguise the state of the organisation's transactions and to open, maintain or access any illegitimate accounts with a bank or a third-party institution to conduct account transactions related to the organisation. Ensuring that any records that may be linked to an investigation, litigation or legal settlement are not destroyed, altered or forged.

Employees who encounter incidents involving unethical conduct or have suspicions of unethical conduct are obliged to inform Street Child's management team.

4.2 Respect for Stakeholders

Street Child respects the privacy and integrity of all employees and upholds strict standards of privacy and confidentiality for personal information. Treatment of beneficiaries, partners, donors and suppliers and data concerning other individuals shall also be bound by this principle of confidentiality.

Each employee must deal fairly and inclusively with beneficiaries, partners, donors and suppliers, treating all stakeholders with dignity and respect. No employee should take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other arbitrary practice.

Street Child is to maintain open communication channels to encourage all employees to be active participants in the organisation and express their ideas and opinions freely.

4.3. Avoidance of Conflict of Interest

Employees should avoid incidents that may involve a conflict of interests with Street Child. Where there is an actual, potential or perceived conflict of interests, employees must fully disclose such conflict of interests to their manager and to the Street Child's Country Director as required. More detailed guidelines on conflicts of interests are set forth in Street Child's Conflict of Interests policy. All employees are required to file a Conflict of Interest form with the organisation citing any possible conflict of interests that might concern the individual or the organisation.

4.4. Substance Abuse

Street Child expects all employees to come to work in a condition fit to perform their duties. Employees may use prescribed medications whilst at work, provided that the use of such medications does not adversely affect the performance of their duties, the employee's safety, or the safety of others.

The unlawful manufacture, possession, distribution, transfer, purchase, sale, use, or being under the influence of alcohol or illegal drugs during working hours; whilst at work or at project site; or while in possession of, or operating, a vehicle or machine leased or owned by the organisation is strictly prohibited.

Street Child reserves the right to request that employees undergo drug or alcohol testing in accordance with the relevant laws. Any employee who appears to be under the influence of alcohol or illegal drugs during working hours (whilst at work or at project sites) shall be removed from the premises as quickly as safety permits, and shall remain off the premises pending the outcome of an investigation. Upon completion of the investigation, Street Child will initiate the appropriate response. Any employee who violates these rules will be subject to disciplinary action, up to and including termination of employment when deemed appropriate.

Threats and Violence

Any person who poses threats, exhibits threatening behaviour or engages in violent acts during working hours whilst at work or at project sites shall be removed from the premises as quickly as safety permits, and shall remain off the premises pending the outcome of an investigation. Upon completion of the investigation, Street Child will initiate the appropriate response. Any employee who violates these rules will be subject to disciplinary action, up to and including termination of employment (when deemed appropriate) and may additionally be subject to civil liabilities and criminal penalties.

4.5. Sexual Harassment

Sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature are strictly forbidden. These behaviours constitute sexual harassment when they influence a decision regarding the employee(s) involved, including training, promotion, awards and other benefits; interfere with an employee's work performance or create an intimidating, hostile, or abusive work environment.

Sexual harassment may include sexual pranks, repeated sexual teasing, jokes, or innuendo, in person or via e-mail or other electronic communication; verbal or physical abuse of a sexual nature; repeatedly standing too close to or brushing up against a person; repeatedly making sexually suggestive gestures; making or posting sexually demeaning or offensive pictures, cartoons or other materials in the workplace; giving gifts that are sexually suggestive; and repeatedly asking a person to socialise when the person has said no or has indicated he or she is not interested. Victims of sexual harassment can be of all genders and can be of the same or different gender as the harasser.

Employees who are alleged to have subjected another employee to unacceptable conduct of a sexual nature (whether such behaviour meets the legal definition of sexual harassment or not) will be subject to an investigation. Upon completion of the investigation, Street Child will initiate the appropriate response. Any employee who violates these conditions will be subject to disciplinary action, up to and including termination of employment (when deemed appropriate) and may additionally be subject to civil liabilities and criminal penalties.

5. Violations

Violations of this Code of Conduct will not be tolerated and will lead to disciplinary action up to and including termination of employment.

An allegation of violation of this Code of Conduct or related laws and the basis for the allegation shall be communicated confidentially to the manager of the alleged violator, or to the Board of Trustees or Country Director of Street Child when appropriate. Measures shall be taken to ensure that no adverse action is taken, either directly or indirectly, against an employee who reports potential misconduct, provides information or otherwise assists in any inquiry of investigation of potential misconduct.

5.1. Reporting Potential Misconduct

Street Child expects employees to report concerns in good faith if they believe there has been a violation of this Code of Conduct. Employees should report any problems or complaints to their manager as soon as possible, in person or in writing. If employees feel uncomfortable addressing their concerns with their manager, they can report directly to Street Child's Operation Manager or Country Director as deemed appropriate.

5.2. Investigation of Potential Misconduct

If Street Child receives an allegation of violation, or has reason to believe any violation is occurring, it will take the necessary steps to ensure that the matter is investigated and addressed promptly. If the allegation is deemed credible, the organisation will take immediate and effective measures to end the violation.

Street Child expects employees to cooperate in good faith with investigations, and where possible, will seek to protect the identities of the alleged victim and perpetrator, except when reasonably necessary. The organisation will also take the necessary steps to protect from potential retaliation the employees who report concerns in good faith.

Street Child commits to resolving the issue or reaching an acceptable compromise with all the concerned parties as soon as reasonably possible.

6. Code of Conduct Certification

Upon commencement of employment and annually thereafter, all employees must complete a Code of Conduct certification. All managers at Street Child should be trained annually on evaluating and effectively addressing violations of the Code of Conduct.

7. Interpretation

An overview of all conduct related situations that may arise at Street Child is beyond the scope of this document. Therefore, employees must use sound judgement to avoid any appearance of misconduct. Employees with any questions about this policy or its application should maintain caution and transparency and seek advice from their manager.

All employees and volunteers must confirm that they have read, understood and agreed to abide by the Code of Conduct, and that they understand that such adherence is a condition of employment, and that violations may be grounds for termination with just cause, without notice.

3. Behaviour protocols

Project specific behaviour protocol for staff, volunteers and associated personnel
The following behaviour protocol applies to Street Child's staff, volunteers and associated personnel (including operations and programmes) and it is put in place in order to ensure that the aforementioned personnel do no harm to children, young people and vulnerable adults.

Unacceptable Community Educators' and other staff's behaviour in relation to beneficiaries and other stakeholders involved in the programme

- Exposing the beneficiaries to violence, exploitation, neglect and abuse
- Exposing the beneficiaries to discrimination, corporal punishment and bullying
- Being alone with a single child, including in a car, overnight, in one's own house or the child's house
- Engaging in or allowing sexually provocative games with children: e.g. kiss, hug, fondle, rub, or touch a child in an inappropriate or culturally insensitive way
- Using language that sexualises a person
- Encouraging any crushes by a child
- Creating, viewing or distributing images in any format (print or electronic) of a child who is not appropriately clothed and/or who is depicted in any poses that could be interpreted as sexually inappropriate
- Exposing beneficiaries to pornography or sexually suggestive images/videos/written text
- Exchanging money or any resources for sex or labour
- Acting in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrating any form of emotional abuse
- Discriminating against, showing different treatment or favouring particular students to the exclusion of others
- Insulting, condemning or perpetrating other psychological and emotional abuse
- Discriminating between beneficiaries on the grounds of gender, religion, caste, race, culture, age, disability, religion, sexuality or political beliefs
- Breaking beneficiaries'rights to privacy and confidentiality e.g. obtaining or sharing information without their consent
- Doing things for beneficiaries of a personal nature that they can do for themselves e.g. using latrines, bathing or clothing
- Condoning or participating in illegal, unsafe, or abusive beneficiaries' behaviour.

Additional behaviour protocols for staff, volunteers and associated personnel working with beneficiaries via phone or internet two-way communication.

DO NOT:
- Contact beneficiaries without obtaining appropriate permission either from the student themselves or their parents
- Breach the consent form stipulated with the beneficiaries and/or their parents in any way

- Contact any of the beneficiaries after class and for any non-programme related reason
- Communicate, follow or interact with beneficiaries on personal social media accounts
- Engage beneficiaries online or on the phone without seeking permission from the parents/guardians or students themselves
- Share contact details or personal information of beneficiaries unless Street Child has provided express authorisation and has entered into a confidentiality agreement with the third party
- Discuss personal and private matters online or on the phone with beneficiaries, during or outside of classes
- Engage in online bullying, cyberstalking or any inappropriate activity of the sort.

Child-to-child behaviour protocols

Children and young people are expected to

- Be friendly and particularly welcoming to new children
- Cooperate with each other
- Be helpful
- Challenge (where they feel safe to do so) or report the bullying of their peers
- Be helpful and supportive to peers/younger children in completing their tasks
- Avoid perpetrating any kind of violence (sexual, emotional, physical)
- Respect each other's differences
- Treat staff and volunteers with respect
- Not bully
- Respect the rights, dignity and worth of others regardless of age, gender, ability, race, cultural background or religious beliefs
- Report anything that worries or concerns you to either your Protection Advisor, Community Management Committee Focal Point or any of the below free protection, health and psychosocial services outlined by Protection Advisors.

Additional behaviour protocols for distance learning, or keeping in touch via internet or phone

- Do not share anyone else's number or contact details without their permission (if they are an adult or an emancipated adolescent) or their parent's permission (if they are under the age of 18)
- Do not take or share photos of yourself in online spaces or via SMS with anyone
- Do not take or share photos of others in online spaces or via SMS without their permission (if they are an adult or an emancipated adolescent) or their parent's permission (if they are under the age of 18)
- Be aware that behaviour protocols that applied in classroom and other learning activities, also apply online and on the phone.

4. Procedures for communicating through Mobile phone

- Street Child and implementing partner staff should only use mobile phones provided by the project to contact girls and communicate with team members and should refrain from using their personal mobile phones.
- Street Child and implementing partner staff are not expected to always be 'on call' and should only be contacted during working hours and/or during designated hours for reporting, unless there is a justifiable emergency that requires immediate remote support.
- Only trained, designated Street Child or implementing partner staff (Community Educator, Protection Advisor or Transition Advisor) are to be in charge of contacting the girls via phone calls or texts: they must adhere to the protocols outlined in this Standard Operating Procedure.
- All Street Child and implementing partner staff and volunteers engaged in program activities involving direct contact with girls need be trained on the protocols outlined in this Standard Operating Procedure.
- Parents/guardians of minor children should be contacted and informed on the reasons why their daughters will be contacted via phone, and on the aim of the activity they will be involved in. Their daughter's engagement is discussed, especially if the girl is a minor.
- Informed consent and assent are taken from the girls' and their family members in order to obtain permission to contact them via phone or to share their phone numbers with the members of Street Child and/or implementing in charge of the activity and any relevant stakeholders.
- The objectives and proposed topics of the phone calls /texts are discussed with the girls.
- The girls are provided with information regarding the expected topics to be discussed over call/texts, the times that moderators are going to carry out this activity and when they are not available (e.g. outside working hours).
- All members of the activity, especially facilitators, must refrain from calling outside of the agreed hours and from discussing topics outside of the aim of the activity (e.g. personal matters).
- If a personal distressing matter is reported by the girls to Street Child/implementing partner staff during the phone call (e.g. abuse, domestic violence, etc), this should be immediately escalated to safeguarding focal point and/or reported to the relevant authorities as deemed appropriate, with strict confidentiality.
- Ensure that a Complaint Response Mechanism is in place and that the girls are fully aware of how to provide feedback and report any inappropriate phone call or text they might receive from Street Child/implementing partner staff safely and anonymously.
- Cluster-wise focal point will be appointed whose job will be to ensure that the regular telephone calls made for remote learning was helpful and safe.
- Any change on pre-scheduled times for remote learning will be communicated beforehand to guardians and parents.
- Girls can openly communicate their preference of gender of the facilitator (considering the likeliness of girls being uncomfortable with a male teacher).

Orienting girls on the safety measures while communicating through

When working with girls through phones, during COVID-19, it is important to communicate to them the risks of increased use of phone for communication. Girls will be made aware of the following risks and measures to mitigate against them.

- Teachers start discussing personal matters: there is a risk that the teacher will discuss personal matters with the girls (e.g. personal relationships, family matters etc.), which is inappropriate when the topics discussed go beyond general questions to know how the girls are doing during covid-19. This behaviour might have an adverse impact on the girls, especially if the personal matters discussed are grossly inappropriate, and is also detrimental to their education, because precious educational time is wasted discussing other matters instead. Girls should be instructed on what to expect from the topic of their lesson, and if the teacher discusses personal matters instead, they should report it to the Safeguarding Focal Point.

- Sexting: there is a risk that teachers or any staff involved in online/on the phone activities with the children might send or request sexually explicit photographs or messages via phone or online communication (i.e. sexting). This would impact the girls psychologically, deteriorate mutual trust and damage Street Child and partners' reputation. Girls are to be aware of what sexting is, and must know that if a teacher sends them or requests a sext (e.g. in exchange for better marks) this has to be reported immediately. Moreover, girls need to be aware that they can report this information confidentially, and that there will not be repercussions on their safety and/or education as a result.

- Not obliged to pick the call beside scheduled time: there is a risk that teachers or staff might call beside the scheduled time. Unless previously agreed with the girls, this is an inappropriate behaviour, especially if the call is made to discuss personal matters instead of educational activities. This might deteriorate mutual trust between the girls and Street Child. Girls should be instructed on what times they should expect calls from the teachers, and if the teacher/staff call them repeatedly outside of the agreed hours, they should report it to Safeguarding Focal Point.

- Inform parents about the schedule: as outlined above, there is a risk that teachers or staff might call beside the scheduled time. Unless previously agreed with the parents and/or the girls, this is an inappropriate behaviour, especially if the called is made to discuss personal matters instead of educational activities. This might deteriorate mutual trust between the parents and/or girls and Street Child. Parents should be informed on what times they should expect calls from the teachers, and if the teacher/staff call them repeatedly outside of the agreed hours, they should report it to Safeguarding Focal Point.

- Communicate without hesitation: there is a risk girls might feel unsafe reporting any of the inappropriate behaviours outlined above. This might deteriorate mutual trust between the girls and Street Child and could result in serious breaches of the Code of Conduct going unreported. In order to mitigate this, Street Child's staff should instruct girls on how to safely communicate their feedback (e.g. code phrases) and assure them that their safety and confidentiality will be prioritised.

- Do not retaliate, simply hang up the call and report if you experience harassment or bullying through phone: there is a risk girl might retaliate instead of reporting inappropriate behaviour. This might put them at risk, especially if Street Child staff are unaware that inappropriate behaviour is being carried out. As outlined above, in order to mitigate this, Street Child's staff should instruct girls on how to safely communicate their feedback (e.g. code phrases) and assure them that their safety and confidentiality of information will be prioritised.

Dealing with safeguarding complaints and reports

[In line with Street Child's existing safeguarding reporting, case handling framework and survivor assistance]
As indicated in Street Child's complaint hearing mechanism document, the following is applicable for all complaint hearing and reporting mechanisms.

- The complaint can be received in two ways:
- It can be flagged to a Community Management Committee member
- It can be flagged directly to a member of staff

- Once received, the Focal Point acknowledges the complaint either in writing, which is the standard procedure, or orally, if any written acknowledgment is deemed unsafe or unwanted

- The complaint is then categorised according to its nature and urgency and passed onto the Complaint Hearing Committee

- The Committee usually meets once a month to discuss all complaints received, but if one of the complaints is deemed extremely severe, the Committee can organise an ad hoc meeting to discuss it

- The Committee then decides what kind of action to take, depending on the gravity and nature of the case

- The Focal Point is responsible for communicating the outcome of the investigation to the complainant within a feasible time-frame

- If the complainant is dissatisfied with the resolution of the complaint, he or she may lodge an appeal within thirty days of receipt of the decision; zero reprisal is guaranteed. The Safeguarding Complaints Committee will be responsible for analysing the appeal and determining whether there is sufficient information and evidence to open an investigation.

Additionally, when working through distance learning activities, or when keeping in contact over the phone, girls may not be able to report using the usual means of reporting. Women and girls may lack confidential space to speak on the phone. Making girls aware of the code phrase "I need to speak to Mrs. Krishna" one way staff and volunteers can ask girls to tell them when an incident has occurred. Working through call or one-to-one SMS/Chat communication, the staff can ask the girl to disclose information if they feel comfortable, or to ask if the girl requires urgent care. The staff should know the local referral pathway for each area that the project takes place in. At a minimum, the staff should send the girl a list of services. In the context of COVID-19, services 'availability may change. Below (Figure 2) is a list of help lines/toll free numbers for services available during COVID-19. A more extensive local service mapping can be found in the annex.

Harassment/ Bullying through phone

On one hand, the use of mobile phone eases communications while on the other hand, it could be used as weapon to harass and bully others. In order to ensure that no harm is done and to ensure the best use of phone calls in project activities specifically related to distance learning, Street Child will strictly follow the developed behaviour protocol. The following will be regarded as examples of bullying and harassing through phone calls and will not be accepted in any case:

1. Threatening and humiliating through phone calls and text messages (e.g. threatening someone for reporting a teacher's abusive behaviour or humiliating a student for being on a low learning level).
2. Sending inappropriate, unwarranted, or offensive messages to the beneficiaries' cell number.
3. Verbal abuse (e.g. scolding, use of derogatory language).
4. Ridiculing (e.g. using belittling phrases and words like "it's no use teaching you, you can never learn").
5. Name calling (i.e. using demeaning labels e.g. ugly, fat, stupid etc).
6. Shouting or raising one's voice at girls for not being able to interact on the phone or not being able to answer a question.
7. Demanding sexual favours (e.g. sexting).

Preventive Measures

- All staff from SCON and Implementing partners will be oriented on the Behaviour Protocols and Keeping in Contact with Girls Standard Operating Procedure.
- Girls will be made aware of the probable harassment and bullying; other protection issues they might face and the reporting mechanism to address those issues.
- Girls will be offered a variety of ways to report bullying in the ways indicated in the Reporting Mechanisms/Channel section.

Reporting Channels during COVID-19

Girls who have any complaints or need to report any safeguarding breaches can report them in the following ways. These channels are functional during the lockdown despite restricted mobility.

- Through Community Management Committee representative who will be a member of complaint hearing committee. Committee representative should be in touch with girls on a weekly basis for a general update, providing an opportunity to report any concerns. The representative can escalate the incident to Protection Advisors.
- Talk directly to the Safeguarding Focal Person (Protection Advisors). The complaint is forwarded by the Focal Point to the organisation Safeguarding Focal Point. Protection Advisors will be in touch with girls regularly for delivery of Protection Programme (remote life skills) so girls have an easy access to raise any alarm to them.
- Connecting directly to the existing community protection mechanism like police office, health post (using service directory provided by the Protection Advisors). The girls are familiarised with the process of reporting directly to community/government authorities - this means linking them directly to community protection mechanism such as police stations or health service.