



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 psycho-social 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 phones

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 call 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 timeframe
- 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 services.

Key Free Services for Protection, Psycho-social & Health Support

S.N	Service Provider	Service	Help lines/ Toll free numbers	Remarks
1	Ministry of Health & Population	Any Information on COVID 19	1115, 9851255839, 9851255839, 9851255834	Service from 8 am to 8 pm
2	WOREC Safe House	For survivors and those at risk of domestic violence and abuse	16600178910	N/A
1	WOREC Nepal	For any psychosocial counselling service Nepal Police and WOREC	1660012005 or 1660010205	N/A
3	Anti-Human Trafficking Bureau	Report Domestic Violence during LOCKDOWN	1177	N/A
4	Nepal Police	Psychosocial counselling	1660012005	N/A
5	Nepal Police	Report violence against children, elderly people and vulnerable adult	100/104	N/A
6	TPO Nepal	Psychosocial counselling	16600122322, 166001185080, 16600102005, 1145	N/A
7	Nepal Police	Emergency Service	1113	N/A
8	CWIN	To report violence against children	1098	N/A
9	WOREC Nepal	Report any forms of violence against women and girls	16600178910	N/A
10	Sukraraj Tropical and Infectious Disease Hospital	Health Service- Treatment of COVID 19	Dr.Shraban kumar Mishra : 9851168220 Dr. Rangit Sah : 9827701465 Dr. Rajesh Kumar Gupta :9851239988 Dinesh Thapa Magar :9823168540 (Night Time)	N/A
11	Child Helpline	For anyone facing or witnessing GBV, to receive support for shelter, psycho-social support, child support and legal aid	1145	N/A