

# 3Angels Nepal

## Transparency and Governance Policy



Version	2
File Number	3AN-T&G-1.2
Applicable to	3 Angels Nepal (3AN), its staff, volunteers, visitors, sponsors, contractors, and partner organizations, including sister entities (e.g., 3 Angels Mission School, 3 Angels Community Radio)
Authority	3AN Board
Responsible Officer	CEO and Office of the Admin
Responsible Office	Office of the Admin
Date Introduced	September 2020
Next Scheduled Review Date	September 2027
Scope/Short Description	This policy outlines 3AN's commitment to safeguarding children from harm, abuse, and exploitation across all programs, ensuring a child-safe environment in line with national and international standards.
Related 3AN Documents	3AN Code of Conduct Policy 3AN Conflicts of Interest Policy 3AN Privacy Policy 3AN Complaints Handling Policy 3AN Child Protection Policy 3AN PSEAH Policy 3AN Whistleblowing Policy
Related Legislation and External Documents	<ul style="list-style-type: none"> <li>• United Nations Convention on the Rights of the Child (UNCRC) 1989</li> <li>• Nepal's Children's Act 2048 (1992) / Act Relating to Children 2075 (2018)</li> <li>• Standards of Operations and Management of Residential Child Care Homes (Nepal, 2012)</li> <li>• Department of Foreign Affairs and Trade (DFAT) Child Protection Policy 2017</li> <li>• ACFID Code of Conduct (2019 revisions)</li> <li>• ACNC External Conduct Standards</li> <li>• Sustainable Development Goals (SDGs)</li> </ul>
Key Words	Child Safeguarding, Child Protection, Child Safety, Abuse Prevention, Risk Management, Data Protection, Code of Conduct

## 1. Policy Statement

3 Angels Nepal (3AN) is committed to safeguarding children and young people from all forms of harm, abuse, and exploitation. We recognise that child abuse is a global issue, particularly affecting vulnerable children in isolated settings such as boarding schools or children's homes. As an organisation dedicated to the rescue, prevention, and rehabilitation of children and women at risk of human trafficking, 3AN upholds a zero-tolerance stance on child abuse, neglect, and exploitation. This policy establishes a framework to ensure a child-safe environment across all 3AN programs, aligning with the United Nations Convention on the Rights of the Child (UNCRC), Nepal's Children's Act, and international standards from the Department of Foreign Affairs and Trade (DFAT) and the Australian Council for International Development (ACFID). Our commitment is rooted in biblical values, recognizing children as created in the image of God, deserving of protection, dignity, and care.

This policy outlines 3AN's principles, procedures, and minimum standards to prevent and respond to child abuse, ensuring that all personnel, volunteers, visitors, and partner organizations are accountable for safeguarding children. We aim to empower children to participate in decisions affecting them and to foster a culture of transparency, accountability, and continuous improvement in child protection.

## 2. Scope

This policy applies to:

- **3AN**, including its board members, national and international staff, house parents, caretakers, security guards, and sister entities (e.g., 3 Angels Mission School, 3 Angels Community Radio, 3 Angels Saving and Credit Cooperative Ltd, 3 Angels Initiative for Financial Sustainability).
- **Volunteers**, including local and international volunteers engaged in 3AN programs.
- **Visitors**, such as sponsors, donors, photographers, journalists, or contractors, visiting 3AN homes or programs.
- **Partner Organizations**, including community-based organizations (CBOs), local partner organizations (LPOs), and funding partners like the Asian Aid Organisation (AAO), must align with this policy's requirements.
- **Children**, defined as individuals under 18 years, in 3AN's care or impacted by its programs.

The policy applies in all contexts related to 3AN's work, including family homes, schools, safe havens, and community programs, both in Nepal and in collaboration with international partners, regardless of location, child's age, consent, or initiation of interaction.

## 3. Purpose

The purpose of this policy is to:

- Prevent child abuse and exploitation in all 3AN programs and activities.
- Establish a child-safe organizational culture through leadership, governance, and accountability.
- Ensure robust policies, systems, and procedures to identify, prevent, and respond to child abuse.
- Raise awareness among children, staff, volunteers, and communities about child rights and safeguarding measures.
- Empower children to participate in program design and decision-making.
- Ensure compliance with national laws (e.g., Nepal's Children's Act) and international standards (e.g., UNCRC, DFAT, ACFID).

- Protect 3AN's reputation, personnel, and stakeholders from false allegations while safeguarding children's welfare.

#### 4. Guiding Principles

3AN's child safeguarding efforts are guided by the following principles, which all personnel, volunteers, visitors, and partner organizations must uphold.

##### 4.1 Six Principles of Child Safeguarding

1. **Best Interests of the Child:** All decisions and actions prioritise the child's safety, well-being, and development, in line with the UNCRC.
2. **Zero Tolerance for Abuse:** 3AN does not tolerate any form of child abuse, neglect, or exploitation, and will not engage individuals or organizations posing risks to children.
3. **Shared Responsibility:** Safeguarding children is a collective duty for all 3AN stakeholders, from board members to house parents, ensuring accountability at all levels.
4. **Preventative Approach:** 3AN proactively identifies and mitigates risks through risk assessments, training, and robust screening processes.
5. **Child Participation and Agency:** Children's views and opinions are actively sought and incorporated into program design, implementation, and evaluation.
6. **High Standards in Resource Management:** 3AN ensures that all personnel and volunteers are vetted, trained, and supervised to maintain a child-safe environment.

##### 4.2 Five Rs of Child Safeguarding

3AN implements the "5 Rs" framework to ensure effective safeguarding:

1. **Recognition:** Identifying signs of abuse, neglect, or exploitation through training and awareness.
2. **Reporting:** Promptly reporting concerns or allegations within 24 hours, as outlined in Section 6.4.
3. **Response:** Taking immediate action to protect the child and investigate allegations confidentially.
4. **Referral:** Referring incidents to relevant authorities (e.g., police, District Child Welfare Board) when required.
5. **Review:** Regularly evaluating safeguarding measures through risk assessments and policy reviews to improve practices.

## 5. Definitions

Term	Definition
3AN Personnel	National and international staff, house parents, caretakers, security guards, interns, and board members employed or contracted by 3AN or its sister entities.
Child Abuse	All forms of physical, sexual, emotional abuse, neglect, or exploitation resulting in actual or potential harm to a child, including acts committed in the presence of a child.
Child Participation	Supporting children to express their views and participate in decisions affecting them, acknowledging their agency to influence their environment.
Child Protection and Right Officer (CPRO)	The designated point of contact for child safeguarding concerns and reporting.
Child Sexual Abuse	Involvement of a child in sexual activity they do not fully comprehend, are unable to consent to, or that violates legal or social norms, including indecent touching, exposure, or exploitation.
Child/Children	Any person under 18 years of age, including unborn children where applicable.
Exploitation	Using a child for work or activities that harm their physical, mental, or social development, including child labor, trafficking, or sexual exploitation.
Grooming	Building an emotional connection with a child or their caregiver to gain trust for the purpose of abuse, exploitation, or trafficking.
Neglect	Persistent failure to provide a child's basic needs (e.g., food, shelter, medical care), leading to significant harm or risk to their health and development.
Partner Organisation	Organizations, such as Asian Aid Organisation (AAO), with formal partnership agreements with 3AN.
Reasonable Grounds for Belief	A belief that child abuse has occurred, based on objective assessment of facts, indicating a child is in need of protection or has suffered significant harm.
Visitors	Individuals visiting 3AN programs, including sponsors, donors, photographers, or journalists.
Volunteers	Individuals, local or international, who support 3AN programs without payment, including short-term volunteers.

## 6. Policy in Action

### 6.1 Recruitment and Screening

3AN implements child-safe recruitment practices to minimise risks of harm:

- **Screening:** All personnel, house parents, volunteers, interns, and contractors undergo police clearance checks, reference checks, and interviews assessing suitability for working with children.
- **House Parents:** Must be Nepali citizens, Adventist couples (or trained single supervisors), with no criminal records and training in child psychology and Nepal's child protection laws.
- **Volunteers:** International volunteers require police clearance from their country of origin and three reference checks. No volunteers serve as house parents.

- **Training:** All personnel, volunteers, and contractors receive induction on this policy, the Child Safe Code of Conduct, Friendly Code of Conduct, and data protection procedures, with regular refresher training.
- **Reporting Changes:** Personnel must report changes in circumstances (e.g., criminal charges) to the CPRO, with reviews conducted per 3AN's disciplinary policy.

## 6.2 Risk Management Approach

3AN adopts a proactive risk management approach to reduce child safeguarding risks:

- **Annual Child-Focused Risk Assessment (CFRA):** Conducted by the Welfare and Protection Team to assess risks across all programs and homes.
- **Activity-Specific Risk Assessments:** Required for all activities involving child contact, impact, or access to personal information, documented in a Child Safeguarding Risk Management (CSRM) matrix.
- **Child-Led Risk Assessments (CLRA):** Children are involved in identifying risks in their environment, empowering their agency.
- **Annual CSRM Review:** The CPRO and HOD review the CSRM matrix to evaluate risks and mitigation progress.
- **Partner Organisations:** Must conduct Program Wide Risk Assessments (PWRA) and report progress to 3AN and funding partners like AAO.
- **Reporting:** Risk assessment findings and incident reports are shared with the 3AN Board and AAO annually.

## 6.3 Responsibilities

Safeguarding children is a shared responsibility:

- **3AN Board:** Holds ultimate responsibility for policy implementation, oversight, and ensuring effective internal controls.
- **Director/CEO:** Investigates incidents, ensures compliance with laws and policies, manages media inquiries, and provides training support.
- **Head of Department (HOD):** Promotes child safety, conducts risk assessments, supervises staff training, and facilitates reporting within their department.
- **Child Protection and Right Officer (CPRO):** Manages safeguarding concerns, coordinates reporting, and maintains confidential records.
- **Welfare and Protection Committee:** Supports incident investigations and policy implementation.
- **House Parents and Staff:** Ensure a safe family environment, report suspicions, empower children's voices, and comply with the Child Safe Code of Conduct.
- **Volunteers and Visitors:** Adhere to this policy, sign the Child Safe Code of Conduct, and report concerns to the CPRO.
- **Partner Organisations:** Develop and review their own safeguarding policies, train personnel, and report incidents to 3AN and authorities.

## 6.4 Reporting

All personnel, volunteers, visitors, and contractors must report concerns within 24 hours to the CPRO, immediate supervisor, HOD, Designated Safeguarding Officer, Welfare and Protection Committee, Nepal Police, or Central Child Welfare Board when they:

- Witness, suspect, or receive allegations of child harm.
- Have reasonable grounds to believe a child is at risk due to actions by 3AN personnel, volunteers, visitors, or partner organisation staff. Examples include:
- Disclosures of abuse by a child or adult.

- Observations of harm or potential harm.
- Breaches of this policy or the Child Safe Code of Conduct. Reporting follows the **Incident Report Form** and is documented confidentially, protecting the reporter's and child's identities to the extent permitted by law. The CPRO escalates reports to the Director/CEO, HOD, and, if required, the District Child Welfare Board, Nepal Police, or National Child Rights Council (NCRC). Children and families are informed of reporting processes in age-appropriate language.

## 6.5 Partner Organisation Reporting

Partner organizations, including AAO, must:

- Report incidents within 24 hours to the 3AN Director/CEO, HOD, and CPRO, using the Incident Report Form.
- Address incidents involving 3AN personnel, volunteers, visitors, or their staff/contractors.
- Provide annual safeguarding reports to 3AN, detailing risk assessments and incident outcomes.
- Align with 3AN's reporting procedures, Nepal's legal requirements, and the 3AN PSEAH Allegation Management SOP.

## 6.6 Marketing, Fundraising, and Public Relations

3AN protects children's privacy in marketing, fundraising, and public relations activities:

- **Child Sponsorship and Promotion:** Personal information, images, and stories are collected only when strictly necessary and proportionate, managed per the 3AN Privacy Policy, Ethical Communications Policy, and Data Protection Policy, ensuring dignity and informed consent.
- **Confidentiality:** Sensitive information (e.g., abuse disclosures) is shared only with authorized personnel (e.g., CPRO, HOD) and authorities, maintaining strict privacy.
- **Data Security:** Personal information is stored securely, both physically and digitally, using encryption and access controls to prevent unauthorized access, disclosure, alteration, or destruction. Data is retained only for the duration necessary, as outlined in the 3AN Data Protection Policy.
- **Individual Rights:** Children, guardians, and community members have the right to access, rectify, or request deletion of their personal information, subject to legal and ethical considerations. Procedures for handling such requests are defined in the 3AN Data Protection Policy.
- **Compliance:** Aligns with UNCRC privacy rights, Nepal's data protection laws, and international standards (e.g., DFAT, ACFID).

## 6.7 Sponsorship Guidelines

- **Eligibility:** Children must be orphaned/abandoned, rescued from trafficking, under 8 years (or 3 for prison rescues), with complete legal documentation.
- **Sponsorship Plans:** Approved before admission, with no contributions expected from relatives.
- **Communication:** Children are informed about sponsorship, but do not directly contact sponsors unless approved by the HOD.
- **Vacations:** Children are not sent to relatives during vacations without formal arrangements.
- **Exit Procedures:** Immediate reporting to sponsors/partners upon a child's exit, involving house parents and the HOD.



## 6.8 Visitation Policy

- **Pre-Arrangement:** All visits are prearranged with the HOD and house parents.
- **Screening:** Visitors sign a visitation form and provide police clearance (for international visitors). The Director/CEO may deny visits if concerns arise.
- **Supervision:** 3AN staff or house parents are present during all visits. Children are not taken off-site without approval.
- **Physical Contact:** Handshakes are acceptable; hugs are limited to same-sex interactions; embraces or culturally insensitive touches are prohibited.
- **Photography:** Prohibited without HOD permission and child/guardian consent.
- **Confidentiality:** Children's contact details are not disclosed to non-sponsors.

## 6.9 Use of Children's Images and Personal Information

3AN ensures the safe and ethical use of children's images and personal information:

- **Dignified Portrayal:** Children are portrayed in a dignified and respectful manner, as part of their community, appropriately clothed, and not in vulnerable or sexually suggestive poses. Local cultural traditions are considered to ensure appropriate representation.
- **Honest Representation:** Images and personal information honestly reflect the context and facts, aligned with the 3AN Ethical Communications Policy.
- **Consent:** Explicit written consent is obtained from the child (where age and understanding permit) or their guardian, clearly stating the purpose, use, duration, and access of the image or information. Consent forms are securely maintained, and consent can be withdrawn at any time, with clear procedures communicated per the 3AN Data Protection Policy.
- **Secure Storage and Transmission:** Images and personal information are stored securely, with file labels and metadata avoiding identifying information. Electronic transmission uses secure protocols (e.g., encryption) to prevent unauthorized access.
- **Screening:** Photographers and individuals handling personal information undergo police checks and suitability assessments.
- **Authority:** 3AN reserves the right to deny photography or information collection and to remove unconsented images or information from online or published sources.
- **Data Security:** Technical and organizational measures, including encryption and access controls, protect against accidental or unlawful destruction, loss, alteration, or unauthorized disclosure. Personal information is retained only as long as necessary, per the 3AN Data Protection Policy.

## 6.10 Child Safe Code of Conduct

All 3AN personnel, volunteers, visitors, interns, board members, agents, and contractors (collectively, workplace participants) must adhere to the following Child Safe Code of Conduct, which sets professional boundaries and ethical standards to protect children and reduce risks of abuse. Compliance is mandatory, and all workplace participants must sign the Child Safe Code of Conduct Declaration (Annexure 1). Non-compliance may result in disciplinary action, including termination.

### Acceptable Behaviors:

- Treat all children with respect and dignity, regardless of age, gender, ethnicity, religion, disability, or other status.
- Listen to and value children's opinions, involving them in decisions about activities, policies, or processes affecting them where possible.
- Create a safe, supportive, and inclusive environment that promotes children's participation and cultural safety.

- Report any concerns about a child's safety or well-being promptly to the CPRO, immediate supervisor, HOD, Designated Safeguarding Officer, Welfare and Protection Committee, Nepal Police, or National Child Rights Council (NCRC).
- Adhere to 3AN's Child Safeguarding Policy, PSEAH Policy, Privacy Policy, and Data Protection Policy.
- Undergo regular child protection and data protection training as part of induction and refresher programs.
- Be aware of and respect cultural contexts and sensitivities when interacting with children.
- Maintain professional boundaries in all interactions with children, both in-person and online.
- Ensure any physical contact is appropriate, necessary, and limited to the child's care and safety (e.g., handshakes or same-sex hugs where culturally appropriate).
- Obtain informed written consent from the child (where age-appropriate) and their guardian before taking photographs, videos, or collecting stories, explaining the purpose, use, and context.
- Respect children's privacy and confidentiality, avoiding disclosure of personal or sensitive information unless required by 3AN's reporting procedures.
- Be a positive role model, demonstrating ethical and courteous behavior.
- Comply with 3AN's protocols on communication with children and record-keeping/information sharing.
- Contribute to 3AN's policies, discussions, and reviews on child safety and well-being where appropriate.
- Identify and mitigate risks to children's safety per 3AN's risk assessment processes.

**Unacceptable Behaviours** (not tolerated under any circumstances):

- Any form of child abuse, including physical, sexual, emotional, or neglect.
- Any form of sexual harassment, exploitation, or grooming.
- Any form of discrimination, favouritism, bullying, or intimidation.
- Any form of verbal abuse, humiliation, or inappropriate language.
- Any form of exploitation, manipulation, or neglect.
- Inappropriate or unnecessary physical contact with children.
- Being alone with a child in a private setting without another adult present.
- Giving gifts or special Favors to individual children, which may create perceptions of favouritism.
- Arranging personal contact (including online) with children for purposes unrelated to 3AN activities.
- Using language or behaviour that could harm, offend, or endanger a child.
- Showing or providing children access to inappropriate images or material.
- Working with children while under the influence of alcohol or prohibited drugs.
- Ignoring or disregarding suspected or disclosed child harm or abuse.
- Terminating unborn children, recognizing the sanctity of life from conception, in alignment with 3AN's biblical values.

**If a Breach is Suspected:**

- Prioritize the best interests of the child and take immediate action to ensure their safety.
- Promptly report concerns to the CPRO, HOD, Director/CEO, Designated Safeguarding Officer, or Welfare and Protection Committee, following 3AN's reporting procedures.
- Comply with Nepal's legislative requirements and 3AN's internal/external reporting policies.

**7. Policy Breach**



Breaches of this policy, the Child Safe Code of Conduct, or Friendly Code of Conduct are investigated by the CPRO, Director/CEO, and Welfare and Protection Committee, with support from the Human Resources Manager. Breaches may result in:

- **Initial Meeting:** Discussion with the alleged perpetrator to understand the situation.
- **Disciplinary Measures:** Warnings, increased supervision, compulsory retraining, or duty adjustments.
- **Investigation:** Internal review, potentially involving Nepal Police or an independent investigator.
- **Suspension:** Alleged perpetrators are stood down on full pay, distanced from children and workplaces.
- **Termination:** Confirmed breaches lead to severance of ties, including employment or engagement.
- **Legal Action:** Referral to authorities for criminal investigation, as required by Nepal's laws.
- **Reporter Protection:** No action is taken against reporters of legitimate concerns. Intentionally false or malicious allegations result in disciplinary action.
- **Confidentiality:** All parties must maintain confidentiality during investigations, protecting the reporter's and child's identities to the extent permitted by law.

3AN reserves the right to implement safety management plans or terminate engagement for significant or repeated breaches posing risks to children.

## 8. Policy Amendment Table

Version	Date	Description of Amendment	Approved By
1	June 2024	Initial policy development, incorporating AAO standards, 6 Principles of Child Safeguarding, 4 Principles of Child Rights, and 5 Rs of Child Safeguarding.	3AN Board
1.1	June 2024	Updated Sections 6.1, 6.6, and 6.9 to fully incorporate 2023 guidelines on image and personal information use, including data security, consent documentation, and individual rights. Added reference to 3AN Data Protection Policy.	3AN Board
1.2	June 2024	Removed Section 4.2 (4 Principles of Child Rights) due to overlap with 6 Principles of Child Safeguarding. Updated Section 6.10 to fully incorporate Child Safe Code of Conduct (CSCC) requirements, including acceptable/unacceptable behaviours and declaration. Added Annexure 1 for CSCC Declaration. Expanded reporting contacts in Section 6.4.	3AN Board
1.3	June 2024	Added prohibition on terminating unborn children to Section 6.10 (Child Safe Code of Conduct) under Unacceptable Behaviours, reflecting 3AN's commitment to the sanctity of life. Updated definition of Child/Children to include unborn children where applicable.	3AN Board

## 9. Annexure 1: Child Safe Code of Conduct Declaration

All 3AN personnel, volunteers, visitors, interns, board members, agents, and contractors must sign this declaration to acknowledge their commitment to the Child Safe Code of Conduct.

### Child Safe Code of Conduct Declaration

I, [Full Name], agree to abide by the 3 Angels Nepal (3AN) Child Safe Code of Conduct during my engagement with 3AN and its sister entities. I understand that breaches of this Code may lead to disciplinary action, including termination of my employment or engagement.

**I will:**

- Act following 3AN's child safety and well-being policies and procedures at all times.
- Behave respectfully, courteously, and ethically towards children, their families, and other staff.
- Listen and respond to children's views and concerns, particularly if they indicate feeling unsafe or unwell.
- Promote the human rights, safety, and well-being of all children in 3AN programs.
- Demonstrate appropriate personal and professional boundaries.
- Consider and respect the diverse backgrounds and needs of children.
- Create an environment that promotes children's participation and is welcoming, culturally safe, and inclusive.
- Involve children in decisions about activities, policies, and processes affecting them where possible.
- Contribute to 3AN's policies, discussions, learning, and reviews on child safety and well-being.
- Identify and mitigate risks to children's safety per 3AN's risk assessment processes.
- Respond to concerns or complaints of child harm or abuse promptly, per 3AN's procedures.
- Report all suspected or disclosed child harm or abuse as required by Nepal's National Child Rights Council (NCRC) and 3AN's reporting policies.
- Comply with 3AN's protocols on communicating with children and record-keeping/information sharing.

**I will not:**

- Engage in any unlawful activity with or with a child.
- Engage in activities likely to physically, sexually, or emotionally harm a child.
- Unlawfully discriminate against any child or their family members.
- Be alone with a child unnecessarily.
- Arrange personal contact, including online contact, with children for purposes unrelated to 3AN activities.
- Disclose personal or sensitive information about a child, including images, unless consented by the child and guardian or required by 3AN's reporting procedures.
- Use inappropriate language or provide children access to inappropriate images or material.
- Work with children while under the influence of alcohol or prohibited drugs.
- Ignore or disregard suspected or disclosed child harm or abuse.
- Terminate unborn children, recognizing the sanctity of life from conception.

**If I suspect a breach of this Code:**

- I will prioritize the best interests of children and take actions to ensure their safety.
- I will promptly report concerns to the CPRO, HOD, Director/CEO, Designated Safeguarding Officer, or Welfare and Protection Committee.
- I will follow 3AN's policies for receiving and responding to complaints and concerns.
- I will comply with Nepal's legislative reporting requirements and 3AN's reporting procedures.

**Signature:** \_

Full Name: \_

Date: \_\_\_\_

**10. Appendix I: International Conventions and Obligations**

Framework	Description
United Nations Convention on the Rights of the Child (UNCRC) 1989	Sets out children's civil, political, economic, social, and cultural rights, including non-discrimination, best interests, survival/development, and respect for views. Nepal ratified the UNCRC in 1990.
Sustainable Development Goals (SDGs)	17 global goals set by the UN for 2030, with 3AN contributing to SDGs 1 (No Poverty), 3 (Health), 4 (Education), 5 (Gender Equality), and 16 (Peace and Justice).
DFAT Child Protection Policy 2017	Australian framework to prevent child exploitation in aid programs, guiding 3AN's alignment with donor (AAO) standards.
ACFID Code of Conduct (2019)	Australian NGO standards for safeguarding, with 3AN aligning to ensure compliance with donor expectations.
ACNC External Conduct Standards	Australian charity standards for overseas operations, requiring 3AN to maintain appropriate behavior and oversight.
Nepal's Children's Act 2048 (1992)	National law protecting children's rights, guiding 3AN's legal obligations.
Standards of Operations and Management of Residential Child Care Homes (2012)	Nepali guidelines for children's homes, shaping 3AN's family home model.