

CHILD SAFEGUARDING POLICY STATEMENT

Khiri Travel is fully committed to promoting children's rights, notably their right to be protected from harm, abuse and exploitation and to be involved in any decisions that directly affect them.

Khiri Travel has a duty of care to implement effective policies and procedures for safeguarding the welfare of children and young people. In order to achieve this, we will ensure our staff, agents and volunteers are carefully selected, screened, trained and supervised.

Furthermore, we will endeavor to keep up to date with national developments relating to the care and protection of children and young people.

Khiri Travel will:

1. Ensure that all workers understand their legal and moral obligations to protect children and young people from harm, abuse and exploitation
2. Develop best practice in relation to the recruitment of all workers (paid staff and volunteers)
3. Ensure that all workers understand their responsibility to work to the standards and procedures detailed in the organizations, Code of Conduct, Child Safeguarding procedures e.g. Child Safeguarding Guideline
4. Ensure that all workers understand their obligations to report care or protection concerns about a child/young person, or a workers conduct towards a child/young person, to the organization
5. Ensure that all procedures relating to the conduct of workers are implemented in a consistent and equitable manner
6. Ensure that the designated ChildSafe Focal Person understands his/her responsibility to refer any child protection concerns to the statutory child safeguarding agencies (i.e. police and/or social work)
7. Ensure that the organization meets all its responsibilities in adhering to the requirements of the Children's Act 2004 and Protection of Children (Scotland) Act 2003
8. Provide opportunities for all workers (paid and unpaid) to develop their skills and knowledge particularly in relation to the care and protection of children and young people
9. Ensure that children and young people are enabled to express their ideas and views on a wide range of issues and will have access to the organization's complaints procedures
10. Endeavour to keep up to date with national developments relating to the care and protection of children and young people

11. Require staff to take reasonable steps to ensure that children and young people in their care are protected against exposure to abuse through their use of the internet, email and social networking.

CHILD SAFEGUARDING PROCEDURES

Section 1 – Introduction

- ⊗ A child is defined as a person under the age of 18 (Children’s Act 1989)
- ⊗ For the purpose of this policy document the term ‘Student’ shall be used to describe all children and young persons participating in any Khiri Travel led activity. The term ‘staff’ will be used to describe those employed on a contract of employment at Khiri Travel including those working on a temporary, voluntary or unpaid basis. The term ‘Trip’ shall include all activities associated with the training, build up, fundraising and promotion of any product provided by Khiri
- ⊗ Staff should implement this policy using the following guidelines when conducting any activity that involves children. This will protect the safety and well-being of children engaging with the company and that of our own staff
- ⊗ All adults participating in our trips are in loco parentis and have a duty of care with respect to all members of their trip. All young people participating on a trip are expected to be treated in the manner defined within this policy, irrespective of whether or not they have reached the age of consent or are over 18.
- Khiri Travel has a commitment to children’s rights, notably their right to be protected from harm, abuse and exploitation and to be involved in any decisions which directly affect them
- ⊗ It shall be the responsibility of the Lead Child Safeguarding Officer to develop and review the Child Safeguarding policy statement and other care and protection policies and guidelines
- ⊗ Khiri Travel actively promotes equality of opportunity and freedom from discrimination on the grounds of age, cultural background, class, disability, ethnicity, gender, religion, or sexual orientation

Section 2 – Recruitment

- ⊠ Khiri Travel will take all reasonable steps to ensure safe recruitment of staff by checking their suitability to work with children
- ⊠ All applicants (staff and volunteers) will be required to complete an application form capable of eliciting the necessary information to allow checks to be carried out on the applicant's past
- ⊠ Details of all applicants (staff and volunteers) will be checked every three years against police records held by the relevant body in their country of origin to determine an applicant's suitability to work with children e.g., Disclosure and Barring Service (DBS) for England and Wales, Tour Guides/Tour Leaders will require to produce a letter from their local police
- ⊠ Any applicant found to be fully listed on the Disqualified from Working with Children's List will not be appointed to work (paid or unpaid) in connection with any Khiri Travel activity
- ⊠ Khiri Travel shall ensure that staff are selected on their suitability and competency for the activity requirements and their ability to demonstrate that they can work safely with children

Section 3 - Training

- ⊠ All staff and volunteers must agree and sign up to the Khiri child safeguarding policy and procedures
- ⊠ All staff with a responsibility for ensuring the safety and well being of Students shall receive training and given access to the company's Child safeguarding policy, procedures and code of behavior
- ⊠ The contact details of the company's ChildSafe Focal Contact person will be provided

Section 4 – Types of Abuse and a summary of sign and indicators

- ⊠ Definitions of abuse
 - **Neglect** is defined as a failure to safeguard health, safety and wellbeing and includes nutritional neglect, failure to provide medical care and to protect from physical and social danger. In outdoor pursuits this includes exposing the young person to undue cold or risk of injury without proper care and protection

Signs & Indicators

Constant hunger, Poor personal hygiene, Constant tiredness, Poor state of clothing, Emaciation, Untreated medical problems, No social relationships, Compulsive scavenging, Destructive tendencies

- o **Physical abuse** is defined as hurting or injuring a young person by, for example, hitting or shaking them, through any form of bullying, by plying them with alcohol or inappropriate drugs or in outdoor pursuits by forcing them to participate in an activity when the nature or intensity of that activity exceeds the capacity of their physical capabilities

Signs & Indicators

Unexplained recurrent injuries or burns, Improbable excuses or refusal to explain injuries, wearing clothes to cover injuries, even in hot weather, Bald patches, Chronic running away, Fear of medical help or examination, Self-destructive tendencies, Aggression towards others, Fear of physical contact - shrinking back if touched

- o **Sexual abuse** is defined as an adult using his/her power, authority, or position to use a young person sexually to satisfy his/her own needs, and ranges from sexually suggestive comments to full intercourse, and includes involving them in any form of pornography

Signs & Indicators

Being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age, Medical problems such as chronic itching, pain in the genitals, venereal diseases, Other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia, Personality changes such as becoming insecure or clinging, Regressing to younger behavior patterns such as thumb sucking or bringing out discarded cuddly toys, Sudden loss of appetite or compulsive eating, Being isolated or withdrawn, overreacting to criticism

- o **Emotional abuse** is defined as depriving a young person of help and encouragement and replacing it with derision, ridicule, or ostracisation and includes racially and sexually abusive remarks

Signs & Indicators

Physical, mental and emotional development lags, Sudden speech disorders, Continual self-depreciation ('I'm stupid, ugly, worthless, etc'), Overreaction to mistakes, Extreme fear of any new situation, Inappropriate response to pain ('I deserve this'), Neurotic behavior (rocking, hair twisting, self-mutilation), Extremes of passivity or aggression

Section 5 – Procedures for responding to reports or concerns about abuse /neglect

The following action should be taken where a child or other party with knowledge of an incident reports a suspected abuse or there are signs and indicators that a child has suffered abuse:

- Stay calm and be reassuring
- Find a quiet place to talk and establish the facts
- Believe in what you are being told
- Listen, but do not press for information
- Remain open minded, do not prejudge
- Say that you are glad that the child told you
- If it will help the child to cope. say that the abuser has a problem
- Say that you will do your best to protect and support the child
- If necessary, seek medical help and contact the police or social services
- If the child has told another adult, such as a school leader or guide, contact them.
- Determine if this incident may affect how the child reacts on Trip.
- Acknowledge that the child may have angry, sad or even guilty feelings about what happened, but stress that the abuse was not the child's fault. Acknowledge that you will probably need help dealing with your own feelings
- Do not make any promises not to pass on the information
- Inform the Trip leader, Khiri senior manager or Person in charge of the activity. Ensuring the Lead Child Safeguarding Officer has been made aware.
- At the earliest opportunity, make written notes
- Take all necessary steps to protect the child from a continuation of the alleged abuse

In a case where a worker has harmed a child or placed a child at risk of harm and has been removed from a childcare position, there are grounds for a referral under the Protection of Children to the local police in the first instance. Ensuring you record all details of who the information is given to.

Section 6 – Summary of the referral process to child protection agencies

It shall be the responsibility of the ChildSafe Focal Contact person and country General Manager to take decide the necessary action and refer any incident to the appropriate authority and child protection agency

Where it would likely prejudice any investigation or expose a child to subsequent abuse the ChildSafe Focal Contact person shall reserve the right not to disclose any or certain details of a report to a child's parent, carer, guardian, or school.

Section 7- Whistle blowing

If there is a concern about any member of staff or the management team you must report it to the ChildSafe Focal Person. If you feel for whatever reason your concern may not be dealt with appropriately, you may contact your social services/police and/or local authorities, if a crime may have been committed, without delay.

Section 8 – Protection of Workers who report care and protection concerns

Staff should be reassured that the law protects them from actions by those individuals who have been implicated in abuse, harm and/or neglect of a child or young person as long as the worker's report was not malicious or vexatious.

Section 9 – Data Protection and management of confidential information

Khiri Travel is fully compliant with The Data Protection Act and will not pass on information shared in confidence without the permission of the child/young person concerned unless they or someone else is considered to be at risk of harm.

Section 10 – Review of Child Safeguarding policy and procedures

The ChildSafe Focal Person along with Operations shall review the child safeguarding policy and procedures annually or upon introduction of legislation likely to affect the policy.

CHILD SAFEGUARDING GUIDELINE

This guideline is aimed at all Khiri Travel's staff including Manager-level who may need to respond to a child protection and safeguarding incident that has arisen on a Trip. It should be read with direct reference to the Khiri Child Safeguarding Policy.

Key principles

The following key principles must remain at the forefront of individuals' minds when responding to such incidents. All incidents of this nature need extremely sensitive handling by those involved.

- Children and young people's safeguarding must remain the absolute and immediate priority, consider both team members and local young people that are met on Trip
- Record details of the information immediately. Focus on gathering and reporting facts only. Initial data captured can be used in subsequent investigations to help stop offenders in future
- Recognise that adults sometimes need guarding from unfounded allegations
- It is not Khiri's decision to decide if an allegation of abuse is true or not: just record information and report this to the appropriate authority

Incident considerations

The circumstances behind incidents of this nature will vary widely so below are listed a number of incident handling considerations rather than a specific procedure of checklist. The ChildSafe Focal Person shall utilize their experience, training and judgment based upon the nature of each incident.

Internal communications

- All staff to confirm with caller informant (likely to be trip leader but could be SL, School itself or other individual) that all details of the call will be written down in detail and report in the report form
- Remain open minded, do not prejudge
- Gather facts
- If the Student has told another adult, such as a school leader or guide, contact them
- Do not make any promises not to pass on the information
- At the earliest opportunity, make written notes
- immediately notify Child Safeguarding Officer team
- It may be necessary to take steps to immediately protect the child from a continuation of the alleged abuse if, for example, the alleged abuser has access to the Student during the Trip. This could necessitate immediate removal of a Leader or supplier employee from the team if they are alleged to have breached the Child Safeguarding Policy. They shall not be permitted access to the Student or Team until approval by the Lead Child Safeguarding Officer
- It will not be possible to guarantee secrecy to the Student, but you can confirm that the absolute minimum number of people will be informed to deal with the incident correctly
- Consider taking the incident handling away from all staff who are not involved in order to conserve confidentiality and keep details restricted to a minimum (and strictly to those who need to know)
- Consider recording and logging incident communications through a more secure method Do not leave handwritten notes left unattended

- For incidents involving suppliers or local children/young people, consider tasking the ChildSafe Focal Person first. Local agencies are then likely to lead further action.
- For incidents involving the ChildSafe Focal Person themselves, consider deploying a suitable senior member of Staff or other employee to the destination

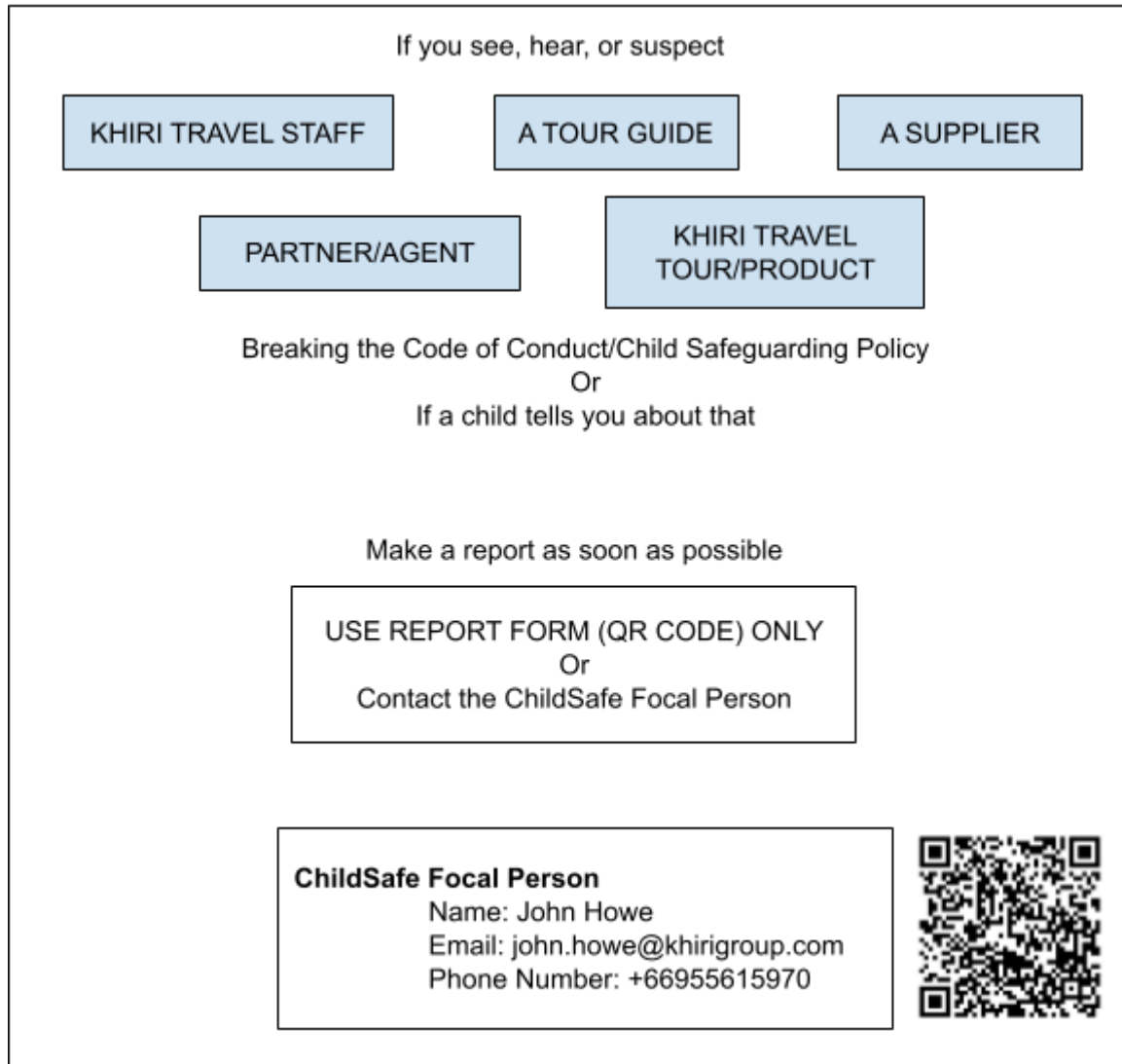
External communication

- Notify school Head/Deputy/Assistant (Pastoral). The school should then activate their own internal school protocol. Clarify responsibilities and duties between school and WildChina in order to prevent miscommunication or potential information or process gaps. Establish a schedule of updates between School and a Child Safeguarding Representative
- Notify parents – ensure School makes this call. In some cases, parents may not be informed if it might prejudice an investigation or put child at risk

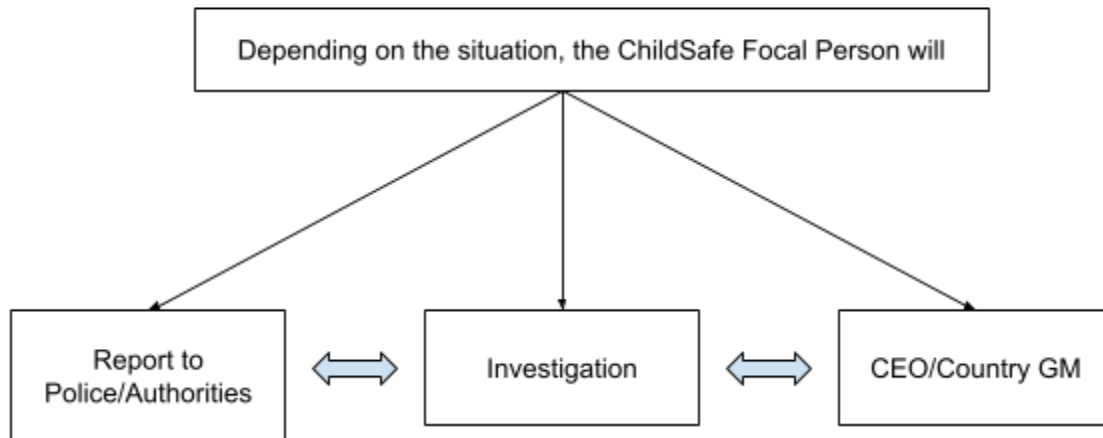
Follow-up actions

- Collate all communications in a secure file
- Ensure appropriate home authority to the Student has taken control of the incident
- Consider the need to refer the alleged abuser to the Disclosure and Barring Service. There is a legal requirement for this to be conducted in certain cases.
- Notify HR & Operations to withhold Guide/ Leader payments or Plans to withhold supplier payment as applicable
- Consider potential of disciplinary action when external action is not being taken

KHIRI TRAVEL'S CHILD ABUSE - REACTION FLOW CHART



KEEP THE CHILD SAFE



If the ChildSafe focal person at your company is suspected of abuse: staff need to report to the Director and/or General manager.

REPORT FORM



CHILD WELFARE CODE OF CONDUCT (STAFF)

This Code of Conduct is aimed at safeguarding the physical and mental well-being of all children and young people (hereon referred to as “child/children”) including but not limited to children in destination communities, children as clients, and children of staff.

All staff, including but not limited to both payroll staff & contractual staff, interns, volunteers, board members, are required to agree, abide by, and sign this Code of Conduct.

Sufficient concerns about a staff member’s behavior with children will result in full dismissal and possible referral to relevant authorities.

Any employee of **Khiri Travel** not in compliance with any of the guidelines below will be subject to disciplinary action which may lead to termination of employment, as determined by managerial discretion. Additionally, the situation will be reported to the relevant authorities as appropriate.

1. Be ChildSafe Prepared and Avoid Putting Yourself, Travelers, and Your Company in Risky Situations

Do:

- Make sure you are familiar with your company’s Code of Conduct and Child Safeguarding Policy
- Learn to identify your company’s ChildSafe Focal Person, who you should approach with any questions or concerns about child safety and well-being
- Be aware of the contact details of local authorities and emergency services for the countries in which you work

Do Not:

- Condone or participate in behavior that is illegal and/or unsafe
- Condone or participate in behavior that contravenes your company’s Code of Conduct and/or your Child Protection Policy.
- Believe “It could never happen to me”

2. IN CASE OF INTERACTIONS WITH CHILDREN

Do Not:

- Initiate contact with a child. Hugging, holding a child on your lap, or even tapping a child on the shoulder may be considered inappropriate depending on the circumstances
- Take easily identifiable photos of individual children, or photos of you posing with a child or children. “Selfies” are not encouraged. These kinds of photos, especially when posted online, may pose an identification risk to the child, and it infringes on their right to control how their image is used
- Show favoritism toward, or spend excessive time with one child
- Offer gifts to individual children. If providing a gift is appropriate, it should be given to parents/caregivers in a public setting or through a reputable organization with prior

agreement about what is needed. "Gifts" such as candy, or other wasteful items, or items brought from home, are not encouraged

- Act or speak in any way that is, or could be interpreted as, inappropriate, threatening or sexually provocative
- Stay alone with a child where no one else can see what you are doing (in a closed room, for example)
- Take a child who is not under your guardianship to your home, hotel, or other private space
- Hit or physically abuse a child or any person.
- Develop any form of romantic or sexual relationship with children or young people, whether physically, verbally or online
- Act or use language in a way that could shame, humiliate, or degrade a child
- Take pictures of naked children or children in distress under any circumstance
- Take pictures of children depicting or mimicking sexually explicit behaviors
- Ask children to pose for photographs in exchange for money, food or gifts
- Visit websites, download material, or send emails that involve children in pornographic, sexual, discriminatory, intimidating, violent or criminal situations

Whilst We Deem Appropriate and Encourage You To:

- Always be an example of the good conduct you wish others to follow
- Treat all children equally and without discrimination on the basis of age, gender, disability, faith, sexuality, etc.
- Explain clearly and honestly what you intend to do at the start of any experience that involves being in contact with children or young people
- Communicate with children and young people in a manner that is respectful, transparent and visible to other persons in the area
- Share the correct ways to interact with children with clients (adult and child travelers) and take corrective action if you witness inappropriate behavior. This includes behavior relating to cultural sensitivities and photographing and videoing
- Take pictures of children only with informed consent, with a professional objective and in full respect of the company's Media and Communications Guidelines
- Ensure that children are aware of their right NOT to participate and that they may withdraw from an experience/activity at any time
- Raise any concerns or suspicions you have regarding the safety or well-being of children to your company's ChildSafe Focal Person and/or relevant national authorities or organizations (such as national child helplines or local child protection organizations). When making a report collect as much information as you safely can. Avoid confronting the person about whom you are suspicious, and don't question the child involved, as this could put you at unnecessary personal risk and cause further harm to the child
- Respect local laws and traditions. Be aware that your actions are bound by both the laws of your country of residence and destination country, and you may be prosecuted by both when breaking laws. Never believe that you are above or not bound to local laws

I, _____, agree to abide by all the terms in this Code of Conduct. I understand that any breach may result in immediate termination of my contract, position and/or involvement at Khiri Travel.

APPENDIX

- DO** put this code into practice at all times
- DO** treat everyone with dignity and respect
- DO** set an example you would wish others to follow
- DO** treat all young people equally
- DO** plan activities that involve more than one other person being present, or at least are within sight and hearing of others
- DO** follow recommended adult/young people ratios for meetings and activities
- DO** respect a young person's right to personal privacy
- DO** avoid unacceptable situations within a relationship of trust e.g. a sexual relationship with a youth Member over the age of consent
- DO** have separate sleeping accommodation for Students and Adults
- DO** allow young people to talk about any concerns they may have
- DO** encourage others to challenge any attitudes or behaviors they do not like
- DO** avoid being drawn into inappropriate attention seeking behavior e.g. tantrums and crushes
- DO** try to avoid becoming engaged in private one on one conversation with a Student
- DO** follow the company alcohol guidance when young people are in your care
- DO** make everyone aware of the company child protection procedures – Students, parents, leaders and other staff
- DO** remember this code even at sensitive moments e.g. when responding to bullying, bereavement or abuse
- DO** keep other Leaders informed of where you are and what you are doing
- DO** remember someone else might misinterpret your actions, no matter how well-intentioned
- DO** take any allegations or concerns of abuse seriously and refer immediately

- DO NOT** trivialize abuse
- DO NOT** form a relationship with a young person that is an abuse of trust
- DO NOT** permit abusive peer activities e.g. initiation ceremonies, bullying
- DO NOT** engage in inappropriate behavior or contact . physical, verbal, sexual
- DO NOT** play physical contact games with young people
- DO NOT** show favoritism
- DO NOT** make suggestive remarks or threats to a young person, even in fun
- DO NOT** use inappropriate language. writing, phoning, email or internet
- DO NOT** let allegations, suspicions, or concerns about abuse go unreported
- DO NOT** allow unwarranted criticism of other members of the adult leadership team to go unchallenged
- DO NOT** just rely on your good name to protect you