



CHILD PROTECTION POLICY

1. SCOPE OF THE POLICY

Oikos – Cooperação e Desenvolvimento bases its policies and practices on the Universal Declaration of Human Rights, the Convention on the Rights of the Child, the humanitarian principles of transparency, neutrality, and impartiality, and other relevant international human rights and child-related legislation, while promoting equality, tolerance, and social justice.

Oikos's activities share efforts and responsibilities, as well as facilitate solutions to ensure that all people and children enjoy the right to a dignified life within the framework of sustainable development. Oikos recognizes the importance of a responsible organizational culture that allows for the creation of a safe environment for its staff, partners, and the communities where it operates.

This recognition seeks to promote the importance of this policy among those with whom we work or who collaborate in the organization's activities, as well as to understand and acknowledge the growing concern with this issue, the risks to children posed by all those who collaborate in the organization's activities, and possible inadequate processes and operational management related to working with children.

Oikos believes that all children have the right to live free and should never be victims of any form of abuse, harassment, neglect, exploitation, and/or violence.

Oikos understands that unequal power relations may exist among staff, partners, and third parties, related either to organizational hierarchy and functions, or to the external social environment surrounding the organization in a given country, social context, or community. However, Oikos expects that the power resulting from the position of an individual or group of individuals should not be understood or used as an advantage or a justification to put at risk the dignity of others.

Under this policy, Oikos assumes that child protection entails their absolute and unconditional recognition as rights holders and constitutes an institutional obligation on the part of the organization.

Oikos guarantees zero tolerance towards cases of abuse, harassment, neglect, exploitation, and violence perpetrated or encouraged by staff, partners, or third parties related to the organization. All allegations and complaints will be duly investigated, triggering the necessary disciplinary measures and, whenever legally required, reported to the competent authorities and judicial entities within the applicable jurisdiction. To this end, Oikos will always seek to preserve the integrity and safety of whistleblowers whenever there is a substantiated suspicion that they could be put at risk.

Oikos's actions follow a victim-centered approach, with the organization's response being based on their needs, ensuring their dignity, respect, and privacy.

This policy also includes measures to prevent such behavior, always seeking to foster a safe environment and ensure the well-being of all those involved in the organization's activities. The "Policy on Protection Against Harassment, Exploitation and Sexual Abuse (including child abuse)" complements this policy.

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2. APPLICABILITY

This policy applies to all staff, partners, and third parties related to the organization's activities.

- Staff are understood to include all members of the Headquarters, comprising the members of the Board and the various Departments, as well as the different Delegations in each country where Oikos operates.
- Partners are understood to be all entities that, contractually or through formal agreements, share activities and responsibilities in the various projects and countries where Oikos operates.
- Third parties related to the organization's activities are understood to be volunteers, interns, donors, funders, consultants, and other national or international entities not included in the categories above.

This policy applies during and after contracted working hours, throughout the entire period of collaboration with the organization. Any activity by staff, partners, and third parties related to the organization's activities that takes place outside contracted working hours but does not comply with this policy will be considered a violation of it.

3. DEFINITIONS

Child

A child is defined as any person, of any gender, under the age of 18, regardless of local laws or definitions of majority.

Physical abuse

Physical abuse occurs when a person intentionally causes suffering or threatens to cause suffering to a child. Examples include hitting, beating, shaking, burning, pushing, or restraining. Physical abuse may be a single incident or a repeated pattern and does not necessarily leave marks or visible injuries.

Emotional abuse

Emotional abuse refers to inappropriate verbal or symbolic acts toward a child, or a long-term pattern that fails to provide emotional stability. Such acts may include restriction of movement, degradation, humiliation, intimidation, bullying (including online bullying), as well as threats, fear, discrimination, ridicule, or other non-physical forms of hostile or rejecting treatment. These actions have a high probability of damaging a child's self-esteem and social skills.

Sexual Abuse

Sexual abuse refers to physical intrusion of a sexual nature, whether completed or attempted, through force or under coercive and unequal conditions.

Sexual Harassment

Sexual harassment refers to any unwanted, unsolicited sexual advance in which consent is limited, as well as requests for sexual favors, sexual conduct, or verbal or physical gestures of a sexual nature. It includes any behavior that could be understood as offensive or humiliating to another person, particularly when such conduct undermines work or creates a relationship of intimidation, hostility, or offense in the workplace. Acts may include, but are not limited to, rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing, and touching.

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It may also include involving children in the viewing or production of sexual images, observing sexual activities, or encouraging sexually inappropriate behavior.

Neglect

Considering context, resources, and circumstances, neglect or negligent treatment refers to the persistent failure to meet a child's basic physical and/or psychological needs, in ways that are likely to significantly impair their healthy physical, spiritual, moral, or mental development. This includes failure to adequately supervise and protect children from harm, to provide proper nutrition, shelter, and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol abuse, and neglect or mistreatment of a child with disabilities.

Sexual Exploitation

Sexual exploitation is understood as a form of sexual abuse that involves children in any sexual activity in exchange for money, gifts, food, shelter, affection, status, or any other need that the child or their family may have. This phenomenon may involve the manipulation or coercion of a child, including befriending children, gaining their trust, and subjecting them to drugs and alcohol. It is a form of abuse that can be misinterpreted by children and adults as consensual, and it can manifest in different ways. Specifically, it may involve an older perpetrator exercising financial, emotional, or physical control over a young person; peers manipulating or forcing victims to engage in sexual activity (e.g., in gang contexts); or the involvement of organized networks of perpetrators profiting financially from trafficking young victims across different locations to engage them in sexual activities with multiple men.

Commercial Exploitation

Commercial exploitation is understood as the exploitation of a child in any work or activity for the benefit of others and to the detriment of the child's development in terms of their physical and mental health, moral and socio-emotional well-being, and education. This phenomenon may include, but is not limited to, any form of child labor.

Grooming

Grooming is understood as behavior that enables an offender to target a child for sexual activity. It usually involves building trust with the child or with their family members, parents, or legal guardians with the purpose of sexually abusing the child. Grooming may include developing romantic feelings or exposing the child to sexual concepts such as pornography. It may also involve promises of future relationships, marriage, or monetary or material offers of social value or status, either to the child or to their family members, parents, or legal guardians.

Online Grooming

Online grooming is understood as the sending of electronic messages with inappropriate content to a recipient whom the sender believes to be under 18 years of age, with the intention of leading the recipient to engage in or send sexual content to another person, whether the sender themselves or third parties.

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Whistleblower

An individual who may be a staff member of the organization or a third party, internal or external to Oikos, who makes a substantiated report under the scope of this policy, denouncing sexual abuse and exploitation as well as child abuse. The report may be made upon becoming aware of the occurrence or by acting on behalf of the victim, either replacing them or assisting them in filing the complaint.

Reporter

An individual responsible for producing a report containing the facts and evidence of the allegation and complaint presented, including hearing the victim(s) and the accused. The reporter may be the direct supervisor or someone previously mandated by Oikos, or mandated by the supervisor themselves.

Supervisor

An individual who holds a position in the organization with hierarchical responsibility over the person in question, implying a relationship of functional dependency and accountability of the person to the individual holding the aforementioned position.

disability, or the beliefs of their parents or legal guardians.

- All activities, actions, and conduct of the organization must always be guided by the best interests of the child.
- Following the principle of “do no harm”, the organization takes responsibility for minimizing any harm that may inadvertently be caused as a result of its activities and actions.
- Any form of abuse, harassment, neglect, exploitation, and/or grooming of children carried out by staff or third parties related to the organization’s activities constitutes serious misconduct and provides grounds for termination of the contractual relationship.
- No attitudes or behaviors by any staff member or third party related to the organization’s activities that subject any child to inappropriate actions or unsolicited or unwanted sexual relations of any kind will be tolerated.

4. PRINCIPLES

In order to protect the most vulnerable groups, ensure their unconditional participation in the organization’s activities, projects, and social life, and to safeguard the integrity of the organization, Oikos follows the following principles:

- Non-discrimination of any child, regardless of race, sex, language, nationality, sexual orientation, gender identity, religion, political or other opinion, ethnicity, social origin,

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- Sexual activity with children is strictly prohibited, regardless of the local age of majority or consent. Misunderstanding a child's age will not serve as a justification for such conduct.
- The exchange of money, employment, assistance, goods, or services for any type of sexual activity by staff or third parties related to the organization's activities is strictly prohibited.
- If staff or third parties related to the organization's activities suspect or are concerned about possible abuse, harassment, neglect, exploitation, and/or grooming by another staff member, they must immediately report it in accordance with the defined mechanisms and processes.
- Non-retaliation is a core principle in the handling of complaints under this policy. The organization will not retaliate against any staff member for filing a complaint or participating in an investigation of a complaint.
- All staff and third parties related to the organization's activities are obliged to create and maintain an environment that prevents any abuse, harassment, neglect, exploitation, and/or grooming, and will actively promote the implementation of this policy.

5. COMMITMENTS

To ensure compliance with the principles outlined, Oikos commits to:

- Creating safe spaces of well-being and healthy, positive treatment within Oikos, in all spaces and projects managed and promoted by the organization, and in those in which the organization participates. In these spaces, Oikos teams and staff act as promoters of safety, well-being, the defense and protection of children's rights, as well as their physical, psychological, and emotional development.
- Promoting the social and political participation of children, ensuring that no form of abuse, harassment, or violence can hinder the exercise of their right to access information, think, or make decisions freely and in a manner appropriate to their context, including their age.
- Developing prevention and response strategies to child abuse, harassment, neglect, exploitation, and/or grooming, including integrating these objectives into terms of reference for functions to be performed (covering training, complaints, response mechanisms, and progress reports).
- Recognizing the power imbalance inherent in abusive relationships between a victim and a perpetrator, where the victim's options are limited, and providing empowerment options and access to mechanisms that reduce the victim's vulnerability, exposure to the perpetrator, and ability to report harassment and abuse.

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- Conduct risk assessments to identify areas of risk and document the process of removing and mitigating these risks.
- Include this policy on child abuse, harassment, neglect, exploitation, and/or grooming in the code of conduct, training materials, and sessions provided to staff or third parties related to the organization's activities.
- Ensure that in partnerships, agreements, and contracts this policy is incorporated, including the explicit definition that failure to promote preventive measures against child abuse, harassment, neglect, exploitation, and/or grooming; failure to investigate or report possible occurrences; or failure to take corrective measures in response to any occurrence of child abuse, harassment, neglect, exploitation, and/or grooming constitutes grounds for contract termination.
- Disseminate the policy and regularly inform staff, third parties related to the organization's activities, or communities about prevention and response measures regarding child abuse, harassment, neglect, exploitation, and/or grooming. This information should be developed and disseminated in cooperation with relevant agencies and include details of mechanisms and processes, the status of investigations, and follow-up on defined measures.
- Promote support to communities and local authorities in the prevention of and response to child abuse, harassment, neglect, exploitation, and/or grooming by staff or third parties related to the organization's activities.
- Ensure that complaint mechanisms are accessible and understood by staff.
- In accordance with applicable laws, prevent perpetrators of child abuse, harassment, neglect, exploitation, and/or grooming from being hired or deployed. Human Resources and recruitment officers must ensure robust hiring processes for all personnel, particularly those who will have contact with children (including criminal record checks and behavior-based interview questions).
- Ensure that its staff, operations, and projects do not harm children—that is, they do not expose children to risks of harm or abuse and that any concerns the organization may have regarding the safety of children in the communities where it works are reported to the competent authorities.
- Ensure the creation and sustainability of a safe environment to address the matters covered by this policy, from the reporting of a suspicion or complaint to the conclusion of the investigation process and the sharing of the final outcome.
- Provide support and assistance to complainants of child abuse, harassment, neglect, exploitation, and/or grooming, which may include medical treatment, legal assistance, and psychosocial support, as appropriate, always taking into account confidentiality, cultural sensitivities, and the safety of the victims.

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- Investigate allegations of child abuse, harassment, neglect, exploitation, and/or grooming in a professional manner, using appropriate interview practices (particularly when involving children). Professional investigators and expertise should be engaged as appropriate.
- Take prompt and appropriate action against staff or third parties related to the organization's activities who commit child abuse, harassment, neglect, exploitation, and/or grooming, which may include disciplinary measures, including criminal prosecution, in the country of origin and/or host country.
- Take appropriate measures to protect individuals from retaliation resulting from the reporting of child abuse, harassment, neglect, exploitation, and/or grooming involving staff or third parties related to the organization's activities.
- Ensure continuous updating and learning to enable regular improvements in the prevention of and response to child abuse, harassment, neglect, exploitation, and/or grooming.
- Ensure that participation or engagement with children takes place collectively, in groups of at least five children, or, if fewer, ensure the presence of a tutor, educator, or legal guardian of at least one child, external to collaboration with the organization.
- Ensure monitoring and reporting systems on child abuse, harassment, neglect, exploitation, and/or grooming, with the aim of assessing the effectiveness of processes and improving prevention and response.
- Design all projects and activities with the purpose of minimizing the risk of harm to children with whom they come into contact or on whom they have a direct or indirect impact, taking into account their safety.
- Ensure that all data and images collected from children are processed lawfully, fairly, and transparently, in terms of storage and information processing. Data collection should only occur for specific, explicit, and legitimate purposes and should not be used outside those purposes. All data collected must be adequate, relevant, and limited to what is necessary for the implementation of the organization's activities. All data must be processed with appropriate security measures against potential loss, destruction, or damage, and in compliance with the duty of confidentiality.

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6. RESPONSIBILITIES

All staff and third parties related to the organization's activities

share the obligation to prevent and respond to child abuse, harassment, neglect, exploitation, and/or grooming. They are responsible for following the principles and commitments set out in this policy. All staff and third parties related to the organization's activities working alongside communities must also contribute to the monitoring of this policy by drawing on participants' feedback.

Managers, supervisors, and human resources officers

must ensure that all staff and third parties related to the organization's activities understand and comply with this policy, and they are responsible for recruitment and training. In the case of managers and human resources supervisors, they are also responsible for performance management within the scope of preventing child abuse, harassment, neglect, exploitation, and/or grooming. Supervisors are responsible for verifying and ensuring that investigations, reporting, and disciplinary consequences are properly carried out.

Country coordinators or representatives

must ensure that children are protected from abuse, harassment, neglect, exploitation, and/or grooming in projects in the country of operation. Country coordinators must ensure that the policy is culturally appropriate within the community, developing mechanisms to implement and monitor its effectiveness. This includes raising awareness among project

beneficiaries, staff, and third parties related to the organization's activities about protection against child abuse, harassment, neglect, exploitation, and/or grooming. Country coordinators must also ensure that complaints are received and subsequently investigated, following the necessary disciplinary measures. They are responsible for ensuring that all necessary assistance is provided to the victim.

Any staff or third parties related to the organization's activities who consider themselves to be victims of, or involved in, any form of child abuse, harassment, neglect, exploitation, and/or grooming, as set out above or under Portuguese law or the law of the country of operation, must report immediately to their direct supervisor, or, in case of a conflict of interest, report to the next level of hierarchical responsibility.

All individuals to whom this policy applies MUST:

- Fully comply with and respect the principles, commitments, and procedures set out in this policy, including their obligation to report.
- Recognize every child as a rights-holder, treating them with respect regardless of sex, sexual orientation, culture, ethnic origin, language, religion, political opinion, disability, or economic situation.

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- Promote the active and responsible participation and citizenship of children, ensuring their full physical, psychological, and emotional safety and protection.
- Create an inclusive, enriching, and safe environment that fosters dialogue on the rights and concerns of children and adolescents, as well as of their families and/or legal representatives.
- Promote and set an example of healthy lifestyle habits at the physical, psychological, and emotional levels.
- Assume their responsibilities as adults and staff members of the organization, acting as protective and supportive figures.
- Handle confidential information appropriately regarding children, adolescents, and their families or legal representatives.
- Respect children's personal space and their right to privacy.
- Understand interpersonal differences as something natural and positive.
- Promote creative and peaceful conflict resolution.
- Seek support whenever unsure about the best approach or intervention with children and their families.
- Humiliation, mocking, threats, ridicule, or any other situation that may cause harm or discomfort.
- Carry out any type of action or suggestion of a sexual nature, including exposing children to sexual acts or pornographic images; engaging in physical, verbal, or implicitly or explicitly sexual exchanges; engaging in sexual or romantic relations with children (including marriage), even if religious, ethnic, ideological, or other customs allow it; producing, publishing, consuming, or sharing child pornography.
- Display sexualized, erotic, or sexually provocative behavior in the presence of children and adolescents.
- Remain alone with children in a personal capacity outside the scope of intervention activities.
- Develop exclusive personal relationships with children.
- Display behaviors, attitudes, and/or comments that may incite hatred or stigmatize people who are different for any reason.
- Accept, encourage, and/or tolerate violent behaviors among children and adolescents or dynamics based on physical, psychological, and/or emotional power imbalances.

All individuals to whom this policy applies MUST NOT:

- Discriminate against any child or adolescent for any reason.
- Subject children and adolescents to any form of physical or psychological violence, nor engage in any degrading treatment such as insults, shouting,
- Carry out any type of activity without visibility, i.e., not in public spaces or without open doors, door windows, translucent windows, etc.
- At no time remain alone with a child in a closed space.
- Consume, during activities or interventions, or incite the

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consumption of psychoactive substances, alcohol, and/or tobacco in the presence of children.

- Share or request personal data from children, such as phone numbers, social media accounts, or home addresses, without authorization from a guardian or legal representative.
- Transport children in private vehicles.
- Establish relationships with children and adolescents for personal or commercial purposes.
- Take photos of minors without the express or written consent of their legal guardians (see Data Protection Policy).

7. HUMAN RESOURCES MANAGEMENT

The human resources management of Oikos must reflect its commitment to this policy. Accordingly, alignment with the Child Protection Policy is ensured through:

- **Recruitment processes:** Oikos will only hire individuals who can best guarantee the protection and proper treatment of children and full alignment with this policy and with the organization's principles. Therefore, selection processes include and emphasize criteria that respect this policy, particularly for positions that require direct or indirect contact with children. Selection processes include identity verification, reference checks from previous employment, and a criminal record clearance regarding sexual offenses. Upon signing the contract, individuals will also

be required to sign the organization's Code of Ethical Conduct in force and a Commitment Letter in accordance with the Child Protection Policy.

- **Training processes:** All individuals covered by this policy receive training on it, with regular updates/refresher sessions or whenever deemed necessary. Specific training processes are carried out when new projects involving children are launched, adapted to the concrete reality of the project. When developing specific materials for children, a verification committee is established to ensure the appropriateness of both form and content.
- **Internal monitoring:** Internal monitoring processes of projects always take into account the conduct of all staff involved.
- **Human resources evaluation:** Oikos's human resources evaluation processes take into consideration criteria of both personal and professional conduct.

8. COMPLAINTS AND REPORTING

Whistleblowers must submit a complaint or report as promptly as possible, either verbally or in writing, within a maximum period of 14 working days from the occurrence. For this purpose, reporters may use written correspondence, email, phone calls, verbal statements, third-party intermediaries, or other means, facilitating all types of communication with the organization, but providing concrete, preferably verifiable, information about the reported practice.

The response to the submitted complaint must not exceed 3 months from the date of the occurrence and subject of the report. In exceptional cases, Oikos may provide a response after the mentioned period if it recognizes the need for additional time due to the particular complexity or difficulty in verifying the facts. If a response cannot be given within the stated timeframe, the reporter will be informed of the progress made and the estimated date for receiving the final response.

8.1. Submission of Complaints and Reports at the Institutional Level

Any staff member with a complaint or report regarding any aspect of their employment relationship must discuss it with their direct supervisor, following the instructions for submitting complaints outlined in this section. In submitting complaints and reports, complainant(s) and/or whistleblower(s) may bypass the hierarchical levels immediately above them whenever these are implicated or provide

some type of protection and/or concealment of the practice in question, or whenever there is a reasonable suspicion of conflict of interest:

- i. This should occur if the whistleblower considers that their supervisor is not the appropriate person to resolve the issue that gave rise to the complaint (either being the perpetrator of harassment or discrimination or protecting the perpetrator of harassment or discrimination).
- ii. This should occur if the whistleblower considers that the reported practice was committed by the Country Coordinator or Country Representative, in which case they should communicate directly with the Director of Operations at Oikos – Cooperação e Desenvolvimento Headquarters in Portugal.
- iii. This should occur if the reporter considers that the reported practice was committed by the department director who supervises the reporter's functions, in which case they should communicate directly with the Executive Director at Oikos – Cooperação e Desenvolvimento Headquarters in Portugal.
- iv. This should occur if the reporter considers that the reported practice was committed by the Executive Director, in which case they should communicate directly with the Board of Directors at Oikos – Cooperação e Desenvolvimento Headquarters in Portugal.
- v. If the Board of Directors at Oikos Headquarters does not provide sufficient guarantees of independence from the Executive Director, the communication must be made directly to the President of the General Assembly Board or to the President of the Supervisory

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Committee of the Organization.

8.2. Submission of Complaints and Reports at the Community Level

Recognizing the specificity of each case, context, project, and country, Oikos – Cooperação e Desenvolvimento promotes the submission of complaints by beneficiaries and by staff of local teams and delegations. Any beneficiary with a complaint regarding any aspect of child abuse, harassment, neglect, exploitation, and/or grooming occurring in the course of a project must use the mechanisms established by the project or made available by the organization to do so:

- Direct contact and sharing with the Oikos Team and Delegation of the project in question, with proper identification;
- Contact by email with the Oikos Team and Delegation of the project in question;
- Contact through other communication channels made available by the Oikos Team and Delegation of the project in question.



9. NEEDS AND ATTENTION TO THE VICTIM

Oikos – Cooperação e Desenvolvimento recognizes that children have specific needs, and the attention given to them must effectively respond to those needs. Each victim is different, requiring a case-by-case analysis and responses at different times and stages. This policy acknowledges that not all children will initially come forward or report, as they may not feel ready to do so or may not understand the seriousness of the actions and events. However, they may still seek psychological, medical, or legal assistance, even if they do not wish to formalize a complaint or report.

The process of care and response to the victim's needs is complex, requiring respect for their will and decision-making capacity, ensuring that they are informed of their rights and responsibilities, as well as their condition as free individuals able to make their own decisions. It is, however, essential that victims and those around them are made aware of the means available to report cases, especially when they are minors under the legal guardianship of an adult.

9.1. First Contact with the Victim

The first contact is the starting point when victims seek support or answers. It is where they are provided with reassurance and confidence regarding the subsequent process, which may ensure access to justice and, in many cases, represents the only opportunity to collect the necessary evidence and information should the victim later wish to file a judicial complaint or report.

The objective is to protect the integrity of the victim, safeguard and, if necessary, provide emergency support for their physical and emotional health, as well as to gather the necessary information to understand what happened and assess the risk in order to respond and protect in the best possible way, according to the individual timing and circumstances of each victim.

Before any other intervention, victims must be referred to the appropriate institutions, taking them to the nearest health center and psychological support unit, if possible. In cases of sexual abuse, victims must be informed about the availability of urgent medical support, such as contraceptives and prophylaxis against sexually transmitted infections, in accordance with their wishes.

If the sexual abuse was recent, the information must be provided cautiously and sensitively, emphasizing not changing clothes or bathing and the importance of receiving medical and psychological support. Victims must be informed of the steps to follow in case of filing a complaint or report. If victims have not followed these indications, the appropriate authorities must be contacted.

9.2. Initial Interview with the Victim

After ensuring the response to the victim's immediate physical and mental health needs, the initial interview must take place in an environment of trust and privacy, where the following is carried out:

- **Identify the problem**, as this identification is fundamental for an adequate response and attention to the victim. Identification allows for an understanding of the type of violence suffered, the modality, scope, consequences, and possible risks. Identification should be carried out by specialized personnel whenever possible, according to the emotional state and circumstances of the victim. The identification of the problem must also include an analysis of the resources available to the victim, such as a support network, a safe place to stay, or an emotional state that allows them to make free and informed decisions.
 - **Assess and detect risk**, contributing to preventive protection, understanding the level of risk, and recognizing risk factors.
 - **Prepare a record of the incident**, using a standardized form (attached) common to all records, which allows for the identification of vulnerability factors: victims' immediate needs, situations of discrimination, types of violence suffered, characteristics of perpetrators, existing support networks, among others. This form will be used to ensure institutional follow-up of the event.
- If the interview cannot be conducted with the support of specialized personnel, communication should be adapted to the circumstances, following the points listed below:
- Give credibility to the narrative, subject to investigation, and establish eye contact with the victim to provide reassurance and trust.
 - Provide sufficient time, without rushing the victim's story or interrupting, respecting silence, and paying attention to emotions.
 - Listen actively, empathetically, and respectfully, free of prejudice and stereotypes, considering the particular conditions of vulnerable adults and children according to their age, disability, social status, sexual orientation, religious belief, or any other situation of vulnerability or cultural and social norms.
 - Do not expect communication to always be fluid and do not doubt the account of facts for that reason; it is important to remember that abuse and sexual exploitation primarily attack the person's identity, undermine their self-determination, affect their psychological organization, and alter their ability to communicate.
 - Allow the expression of feelings and emotions (e.g., pain, crying, anxiety, shame, anger, and fear), as well as express words of encouragement to the victim, acknowledging their courage in filing a complaint or report, and provide protection. It is important to convey that the victim should not feel shame or guilt for the incident.

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- Be clear about the next steps, available options, and possible courses of action, as well as the victim's rights. Facilitate the empowerment of child victims of abuse and sexual exploitation, respecting their decisions and timing.
- Keep in mind that many children deny, minimize, or do not understand that they are victims of abuse, harassment, neglect, exploitation, and/or grooming.
- Communicate to the victim, if necessary, the danger they are in, reminding them that they are not alone, supporting them in self-assessment and in objectively understanding their situation.
- Pay special attention to body language and avoid making any complaints, gestures of disapproval, or signs of doubt regarding the victim's statement.
- Do not ask questions that: show disbelief or prejudice about the victim's actions; could be interpreted as seeking justification for the violent act; or rely on questions such as "Why did you say that? Why didn't you do this?" Do not blame, minimize, or justify the violence experienced by the victim.
- Do not become irritated or upset when the victim does not act or does not want to act in a certain way, and do not judge their attitude. Manage the victim's expectations appropriately.
- Do not ask questions that the victim may be unable to answer (such as circumstantial details of the episodes, clothing, exact time, verbal interaction with the perpetrator, detailed reactions, among others).

10. INVESTIGATION AND FINAL DECISION

Oikos – Cooperação e Desenvolvimento will investigate all allegations of child abuse, harassment, neglect, exploitation, and/or grooming as quickly and confidentially as possible.

All parties involved must act responsibly and truthfully in their allegations and in providing information for the investigation. The receipt of a complaint is notified to the reporter, thereby triggering an Investigation or an Investigation Committee.

The initiation of the investigation includes interviewing the complainant, interviewing the person who is the subject of the complaint, reconciling evidence (if available), and interviewing possible witnesses to the incident(s).

The individual responsible for investigating the complaint must carry out the investigation to the depth they deem appropriate and in accordance with the procedures mentioned.

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10.1. Complainants and Whistleblowers

Oikos – Cooperação e Desenvolvimento seeks to promote a favorable, safe, and confidential environment so that reports of potential abuse can be made directly by the complainant or by a whistleblower, whether internal or external to the organization.

Complainant. The report may be made by the victim themselves, in the capacity of complainant, directly affected by abuse or violence perpetrated by one or more individuals within the scope of the Organization's activities (staff member, individual linked to a partner, service provider, donor, or public authority involved in an Oikos project).

Whistleblower. The report may be made by a whistleblower, internal or external to Oikos, acting on behalf of the victim or having become aware of the occurrence as a result of their duties or actions.

10.2. Investigation Process at Headquarters

In the case of reports submitted at Oikos Headquarters, investigations must be conducted by the hierarchical supervisor or the Executive Director. If there are substantiated suspicions of incapacity to respond on the part of the hierarchical supervisors, another responsible person must be appointed to conduct the investigation, impartial to the situation in question.

10.3. Investigation Process in Delegations and Representations

In the case of reports at the level of an Oikos Representation or Delegation, investigations must be conducted by the Representative or General Coordinator or by the Administrative Coordinator, but always with the knowledge of the Director of Operations and the Executive Director. If there are substantiated suspicions of incapacity to respond on the part of these officials in the country, the Director of Operations will appoint another responsible person to conduct the investigation. When the allegation is forwarded directly to Headquarters, a person of recognized competence will be appointed by the Executive Director.

10.4. Results of the Investigation

Once the investigation is concluded, appropriate measures will be taken to resolve the identified problem. Under normal circumstances, provided there are no contradictory pieces of information or absence due to work or vacation, the person who received the complaint must deliver a final decision on the investigation to the complainant or whistleblower in writing, within 15 working days. In cases where the complaint is received by the Executive Director and/or members of the Governing Bodies, the final decision of the investigation must be communicated to the whistleblower in writing within 30 working days.

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The resolution or final decision of the investigation must be documented and communicated to the parties involved in the incident, along with the measures to be taken, determining whether there has been a violation of the Code of Conduct or whether the conduct does not constitute such a violation. In cases constituting serious violations and in accordance with the law, or where the responsible party, the Investigation Committee, or the organization does not have the necessary capacity to resolve or make a final decision regarding the complaint investigation, the competent judicial authorities must be contacted and informed.

In accordance with the conclusion of the investigation, the person accused of abuse or sexual exploitation shall have the right to be heard and to defend their good name, in order to avoid unfounded accusations, blackmail, or bad faith. Any staff member proven, after investigation, to have committed abuse, harassment, neglect, exploitation, and/or grooming of children in violation of this policy shall be subject to a disciplinary process that may result in dismissal for just cause and even referral to the authorities. The whistleblower will be informed of the conclusion and outcome of the investigation as quickly as possible.

10.5. Appeal of the Final Decision

If the reporter considers the written decision insufficient or unfair, the matter must be referred to the Executive Director, or if that person is involved, to the Board of Directors or, alternatively, to the Supervisory Committee. The complainant or whistleblower may formally appeal in writing to the next hierarchical superior. The appeal to the final decision of the investigation must be submitted within a **maximum of**

5 working days after receiving the decision.

The appeal must comprehensively describe the problem and previous attempts at resolution made by the staff member. A new individual responsible for the complaint may conduct a new investigation, with the depth they deem appropriate to resolve the complaint. Under normal circumstances, provided there are no contradictory pieces of information or absence due to work or vacation, the person who receives the complaint must deliver a final decision on the investigation to the reporter, in writing, within 30 working days.

After the internal appeal process, the interim process is closed. However, it remains possible to extend the appeal to national judicial authorities in the country where the alleged abuse, harassment, neglect, exploitation, and/or grooming of children occurred or, in the case of an employee under contract with Oikos, to the competent judicial authorities indicated in the respective employment contract.

11. FURTHER INVESTIGATIONS

The conclusion of a complaint or report does not prevent Oikos – Cooperação e Desenvolvimento from conducting subsequent investigations whenever there are substantiated suspicions that the abuse, harassment, neglect, exploitation, and/or grooming of children perpetrated may have had antecedents and that there may be other silent victims requiring intervention for reparation and assistance.

There is also the need to identify possible systemic vulnerabilities, cultural and socio-economic environments, or networks of perpetrators of child abuse, harassment,

CHILD PROTECTION POLICY

neglect, exploitation, and/or grooming, involving staff or other stakeholders, that may call for reinforced internal vigilance and attention in the prevention, reporting, and reparation of such acts.

12. CONFIDENTIALITY

This policy of the organization guarantees full confidentiality of the situation. In some cases, complaints must be kept confidential in order to safeguard the dignity of the victim, the safety of the complainant or whistleblower, or to preserve the integrity of a broader ongoing investigation. Third parties will only be included in the resolution of confidential complaints on a case-by-case basis and with the agreement of the victim and the whistleblower.

Anonymous complaints are discouraged in order to avoid undermining an ongoing investigation process or the filing of complaints made in bad faith. If the behavior or situation reported by the whistleblower cannot be acted upon without their identification, a director or senior officer will discuss the implications with the whistleblower, and a decision will be made on whether or not to proceed with the investigation.

The submission of complaints will be kept confidential to the fullest extent possible, regardless of the channel used to file the complaint, and neither the staff member nor the whistleblower shall be subject to any form of retaliation for submitting the complaint.

To protect the child or children involved, ensure the integrity of any investigation, and respect the procedural rights of all parties, information related to reports of conduct incompatible with this policy as well as the handling of such reports and any investigation must be treated confidentially and with the utmost discretion, even within the organization itself.

13. MUTUAL RESPECT AND PROTECTION OF STAKEHOLDERS

All those who submit a complaint or report to Oikos – Cooperação e Desenvolvimento will be treated with courtesy and respect. No stakeholder or whistleblower acting in good faith regarding a violation—whether directors, managers, or staff members—shall be subject to persecution, retaliation, or employment-related penalties for filing or participating in an investigation of a complaint or report.

Any stakeholder who seeks to promote acts of persecution, retaliation, or employment-related penalties against a good-faith report will be subject to disciplinary measures, including the possibility of dismissal for just cause.

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The organization expects complainants or whistleblowers to communicate and submit their complaint or report in a correct and appropriate manner. Oikos reserves the right to modify or reject the complaint or reporting process in cases of abusive behavior, disproportionate persecution, or harassment of the subject of the complaint.

In order to protect innocent parties and safeguard the right to the good name of its staff or third parties related to the Organization, Oikos will take the necessary judicial or disciplinary measures, including dismissal for just cause, whenever bad faith on the part of the whistleblower is proven,

namely through:

- False or slanderous reporting;
- Intent of blackmail or retaliation;
- Evident malice or forged evidence; or
- Repeated behavior in filing false reports.

Oikos – Cooperação e Desenvolvimento promotes and encourages its staff to follow ethical conduct based on respect, responsibility, transparency, confidentiality, and non-discrimination.



ANNEXS

CHILD PROTECTION POLICY

ANNEX – FORM FORM

A. General Information

	Registration No.:													
Location:	District/Municipality/Province	Date:												

B. Data of the Person Assisted

Name:				Age:		
Date of Birth:		Place of Birth:		Identification Number:		
Address:				Phone:		
Other persons accompanying to file the complaint or report:	Nº	Name	Sex	Age	Organization	
	1					
	2					
	3					
	4					
	5					
6						

C. Reported Situation

Brief Description of Events:	
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CHILD PROTECTION POLICY

Name of the Perpetrator (if known):	
Organization to which they belong:	

	Yes	No	If yes, in which institution?	If no, why was no complaint or report made before?
Has a complaint or report been previously filed?				

D. Offices and Institutions Involved

Health Clinic	
Specialized Institutional Unit on the subject	
Human Rights Protection Organization	

E. Request for Assistance or Support

Brief Explanation of Assistance to Victims	
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F. Psychosocial Status

Physical and/or Psychological Health Status before the abuse event	Physical and/or Psychological Health Status during and after the abuse event	Specify if there are any health complications

CHILD PROTECTION POLICY

The environment was affected.		There is intimidation by the perpetrator.		There is social pressure or fear preventing the filing of a complaint or report.		There is fear of possible retaliation if a complaint or report is filed.	
Yes	No	Yes	No	Yes	No	Yes	No
Description:		Description:		Description:		Description:	

G. Vulnerability Factors

What risks or threats are visible due to the abuses?

Is there a risk to the victim's physical integrity?	Yes	No	If the answer is negative, is the victim potentially vulnerable to further abuse by the perpetrator?	Yes	No	Further details on the response:

H. Support Network

Name	Relationship	Contact	Address

CHILD PROTECTION POLICY

I. Coping Capacities

What measures did the victim take to overcome the impact of the abuses (how did they survive)?	Victim's capacities to prevent further abusive acts	Possible resilience strategies for the future



Oikos – Cooperação e Desenvolvimento is a Non-Profit Association, internationally recognized as a Non-Governmental Development Organization. We believe in a world without poverty and injustice, where human development is equitable and sustainable at both local and global levels. For this reason, we have assumed the mission of eradicating poverty and reducing inequalities so that all people may enjoy the right to a dignified life.

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