



Issue Department: Human Resource

Release Date: January 4, 2024

Approved By: Kelly Koch, Managing Director

Effective Date: January 15, 2024

Scope: This policy applies to all staff, associates (consultants, contractors, volunteers, etc), trainees and partners of all KOTO organizations including KOTO Co., Ltd. and Know One Teach One JSC.

1. Purpose

The primary purpose of the Staff & Associate Safeguarding Policy is to protect the staff and other associates such as consultants, contractors, volunteers, etc. who dedicate their talents and time to KOTO's mission. This policy establishes and documents the overarching principles that guide KOTO's approach to providing a safe and secure environment for its staff & associates in all aspects of its work.

2. Background

KOTO is committed to ensuring that it creates and maintains a safe and secure work environment for all individuals working with KOTO regardless of their gender, sexuality, ethnic grouping, faith, culture, family income, disability or any other defining feature. KOTO acknowledges its responsibility to create and maintain a work environment that is free from abuse of any kind and ensure safety and security by providing clear communications regarding their rights, establishing code of conducts for both the trainees and staff & partners, providing guidance and resources to prevent and respond to abuse of any form and being committed & prepared to respond promptly and decisively on any concerns that may arise.

3. Related References

- The Vietnam Labor Code No. 45/2019/QH14.
- Code of Conduct about Sexual Harassment at Workplace issued on May 25th 2015 by VCCI, MOLISA and Vietnam General Confederation of Labor (VGCL).

4. Definitions

4.1 Safeguarding – The responsibility and actions that an organization takes to protect the welfare and human rights of people that are in their care, particularly people that may be at risk of abuse, neglect or exploitation. It includes measures to prevent harm and in the worst case to take action in the event of any reports of concern of alleged incidents.

4.2 Abuse - Abuse includes physical abuse, emotional abuse, neglect, exploitation or sexual abuse. Both boys and girls, women and men can be the victims of abuse, and abuse can be inflicted on a child or other vulnerable person by men, women and other children. Please see [Definitions of Types of Abuse](#) for a detailed list of different types of abuse with explanations to ensure a clear understanding.

5. Safeguarding Measures

5.1 Personnel Recruitment, Screening & Orientation

KOTO recognizes that safe recruitment and candidate screening forms a fundamental part of safeguarding and protecting its staff and trainees by ensuring there are procedures and relevant checks in place to

screen out candidates unsuitable to a safe & secure work environment. The core components are:

- Ensure interviews include at least two interviewers and that behavioral questions are included regarding contact with children and vulnerable persons;
- Requiring at least two (2) references for each successful applicant before an offer is made;
- Receiving Police Checks for all successful applicants;

Further details of the recruitment & screening practices can be found in KOTO's Staff Recruitment procedures.

5.2 Orientation for KOTO Staff & Associates

The foundation of any safeguarding policy is to ensure that the intended individuals know their rights, the expectations regarding their actions and behavior and the relevant policies that are in place to ensure the physical and mental safety & security of themselves and their peers. KOTO has taken appropriate measures to document these and to ensure thorough orientation on each of these during their orientation.

5.2.1 Staff & Associate Rights

- A working environment where staff & associates are treated with respect and in which language or behavior towards each other is void of any inappropriate actions including harassing, abusing, sexually provocation, demeaning and/or culturally inappropriate manner. Any infractions from staff, representatives, partners or trainees are dealt with promptly and consistently.
- The provision of an organizational culture that prioritizes safeguarding and acts transparently so that it is safe to come forward and report incidents and concerns with the assurance that they will be handled sensitively and properly.

5.2.2 KOTO Code of Conduct

KOTO has established two Code of Conducts that ensure that staff and associates (consultants, contractors, volunteers, etc.) understand what is expected of them when working with KOTO. Firstly is the [Code of Conduct for working with Children & Young Persons](#). It states the behavior that is expected to ensure KOTO's operations are conducted professionally related to the interactions with the trainees to ensure their physical and mental safety & security. Secondly is the general [Code of Conduct](#). It outlines the principles and guidelines that every employee & associate of our organization is expected to follow. By adhering to these principles, we foster a culture of integrity, respect, and responsibility.

5.2.3 Orientation and acknowledgement of Safeguarding policy & related documents

KOTO's safeguarding policies are provided to incoming staff and associates prior to joining. An overall orientation is planned for all staff and associates within the first week, a detailed orientation session on KOTO's Safeguarding policies and procedures is conducted including interactive exercises to support the full comprehension of the definitions of abuse, measures in place and steps to take in the event that they encounter any concerns that should need to be raised. All staff and associates are required to sign a policy acknowledgement that states that they are aware of, understand and commit to comply with the policy documents. The Human Resource Department documents the list of trainings with participants and keeps records of the signed policy and Code of Conducts acknowledgement and ensures all staff and associates are included.

5.3 Ongoing Education & Training

As part of its commitment of prevention and preparation, KOTO provides ongoing training and resources to support staff, representatives, partners as well as trainees after the initial orientation sessions. These

educational sessions are intended to:

- raise awareness of the need, and measures in place, to keep KOTO's staff, associates and trainees safe;
- communicate the appropriate actions to take in the event a concern or incident occurs;
- provide further resources to help recognize the signs of possible abuse, build trust, etc; and
- keep KOTO's policies and procedures refreshed for all.

At a minimum, staff and trainees are required to attend refresher trainings at least once a year as well as any time the policy or procedures are updated. Additionally, key points of this policy and related guidelines & procedures will be highlighted in Managing Director communications and/or regular Staff meetings at least once a quarter.

Annual affirmation of this policy will be made each year through mandatory policy acknowledgements for all staff and associates. Records related to the training and policy acknowledgements will be held by the Human Resources department.

6. Responding

KOTO will treat all concerns raised seriously and ensure that all parties will be treated fairly and without bias or judgment. All reports will be handled professionally, confidentially and expediently.

KOTO staff, volunteers, associates, etc. are required to immediately (within no more than 24 hours) report any suspected, alleged or evidenced incident of exploitation, abuse or non-compliance of the Safeguarding policies using the [Safeguarding Reporting & Investigation Procedures](#). This Procedure also outlines the requirements for appropriate and timely referrals to statutory agencies in response to concerns regarding possible abuse.

KOTO, in turn, is obligated to notify some of its funders of any suspected, alleged or evidenced incidents as outlined in the Safeguarding Reporting & Investigation Procedures and such notification will be managed by the Managing Director.

If a staff or associate experiences an incident of abuse or suspects/is made aware of an incident related to a fellow staff or associate, s/he should immediately report it to one of the following people:

- Managing Director
- Human Resources Manager
- Relevant Heads of Departments

Alternatively, a written notification can be placed in the Comments, Complaints, Compliments box that is located at the KOTO Training Centre and the KOTO Training Restaurant. These boxes will be checked at least once a week.

In the event that you are approached with an allegation of an incident, it is important to stay calm and take the time to listen to the allegation. Offer reassurance that the person reporting the abuse has done the right thing to report this incident. Do not interrogate the person reporting the abuse, but accept what they have to say and inform the person that you will need to report it. Do not promise secrecy; however, assure them that it will be addressed sensitively. Follow the Safeguarding Reporting & Investigation Procedures to report the allegation.

7. Working with Partners

KOTO employees and associates are expected to build and maintain professional relationships with KOTO's

partners and to adhere to the guidelines outlined in this policy when collaborating with partners. In the event of any safeguarding incidents occurring while working with partners, KOTO employees and associates should diligently follow the Safeguarding Reporting and Investigation Procedures. Any errors caused by employees or associates that impact partners will be addressed in accordance with established regulations.

8. Disciplinary Action

KOTO has a principle of zero tolerance towards acts of abuse and will exercise its right to disciplinary measures including, in serious cases, dismissal (from employment), withdrawal (from consultant or voluntary assignment), contract termination (from partnerships) and/or expulsion (from trainee program) when investigations conducted per KOTO's Safeguarding Reporting & Investigation Procedures demonstrate that the person or organization poses an unacceptable risk to the safety or well-being of its staff, associates and/or trainees.

If deemed appropriate, KOTO may place a staff member accused of abuse on paid suspension or transfer them to other duties as a temporary measure while an investigation is conducted. They will be advised not to contact or come into close contact with the victim during the investigation. If this advice is disregarded, a restraining order may be issued against the accused.

KOTO reserves the right to terminate contract negotiations, refuse to engage an individual, or require an individual to be replaced if appropriate criminal record checks are not undertaken, or cannot be undertaken.

9. Policy Management

This policy has been reviewed and approved by the KOTO Management Board including the Founder and Managing Director.

KOTO encourages its staff to contribute to the continual improvement of its operational environment. In this regard, it welcomes recommendations for improvements and/or revisions to this policy by staff during the course of operations. These improvements should be shared with the Human Resource Manager and Managing Director. These will be reviewed and considered for policy revision. Minor adjustments or additions can be made by the Managing Director. Any substantial changes must be made in consultation and with the approval of the Management Board.

Every three years it is required that the Management Board make a thorough review of the policy and take any identified actions to ensure that the policy continues to meet the needs of the evolving organization.

Additionally, KOTO Managing Director will monitor the awareness, understanding and implementation of this policy. A confidential survey will be conducted to ensure that KOTO staff, associates and partners are aware and understand the policy within 6 months of the policy or subsequent substantial revision is issued. KOTO's ongoing surveys (focused individual/group discussions or questionnaires) will include questions regarding its safeguarding policies and procedures. Spot checks of the required actions for the implementation of this policy will be conducted by the Managing Director or his/her delegate (staff or consultant) at a minimum of twice a year. This includes, but is not limited to, the Recruitment procedures, the policy & code of conduct acknowledgements as well as the orientation and training refresher courses. The agreement between KOTO International and KOTO stipulates that the representatives from the Board of Directors will also conduct spot checks on KOTO's key policies including the Safeguarding policies and procedures during their annual review visits.

10. Change History

History of changes to this document

Date	Modification	Approved by
January 4, 2024	Replace the PSEAH policy	Management Board

11. Related Documents

- Definitions of Types of Abuse
- Code of Conduct for Working with Children and Young Persons
- KOTO Employee Recruitment Procedures
- Code of Conduct
- Safeguarding Reporting & Investigation Procedures