SAFEGUARDING AND CHILD PROTECTION POLICY

1. INTRODUCTION

As a charitable and philanthropic fund working to ensure that every child around the world has access to education, the Luminos Fund recognizes its responsibility to safeguard the welfare of all children who come into contact with our organization. We believe everyone has the right to live free from abuse, harm, or neglect regardless of age, ability or disability, sex, race, religion or belief, ethnic origin, sexual orientation, marital or gender status.

This safeguarding policy outlines our commitment to preventing and responding to instances, within our organization and in the communities we serve, of:

- Physical Harm
- Emotional Harm
- Neglect
- Sexual Exploitation or Abuse (SEA)
- Any other form of exploitation

In addition, this policy sets out our commitment to protecting the personal data and photographic images of any child who comes into contact with our program.

This policy is informed by:

- The United Nations Convention on the Rights of the Child, enacted in 1990, outlines nations' responsibility to promote the inherent dignity and rights of all individuals, “with particular interest in international cooperation for improving the living conditions of children in every country...”.
- The Universal Declaration of Human Rights, which states that all children are entitled to equal and special care and protection.
- The international safeguarding standards promoted by Keeping Children Safe, which were designed to assist organizations in meeting their responsibilities to safeguard beneficiaries.
- International good safeguarding practices, including the IASC Minimum Operating Standards for Protection from Sexual Exploitation or Abuse (SEA) for UN and non-UN Staff. Of special note, Luminos Fund is aligned with and accepts the UN’s standards of conduct outlined in the "Special Measures for Protection from sexual exploitation and sexual abuse, Section 3”.
- United States Agency for International Development (“USAID”) Requirements and Guidance on Child Safeguarding for Implementing Partners, which generally applies to USAID contracts and grants.

The Luminos Fund takes its duty of care for children seriously and aims to implement programs free of harm and minimize risk for children. The Luminos Fund has a zero-tolerance approach to harm, abuse, neglect, and exploitation by staff or associated personnel.

2. PURPOSE

The Luminos Fund's Safeguarding and Child Protection Policy demonstrates the organization's commitment to protecting all children from Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation. It aims to serve as a tool to educate Luminos Fund Staff, Providers, and Implementing Partner Organizations on appropriate conduct and minimum standards required to safeguard children who come into contact with our programs.

The objective of this policy is to uphold the highest protection of children through the Luminos Fund's provision of funds, the conduct of its Staff and Providers, and the implementation of activities by and conduct of its Implementing Partner Organizations.

3. SCOPE AND DEFINITIONS

This policy applies to all Luminos Fund staff, Providers and Implementing Partners (as defined below) while carrying out work in their professional capacity:

- **Luminos Fund Staff**: Defined as any individual employed by the Luminos Fund, including part-time and full-time employees.
- **Providers**: Includes consultants, volunteers, board members, researchers, interns, videographers, photographers, visitors, and any other individual or entity performing work, providing goods or services, or acting for, on behalf of, or at the direction of the Luminos Fund. Please note that the term 'Provider' does not include 'Implementing collaborators' – see definition below.
- **Implementing Partner Organization**: Any entity receiving grant funding from or through the Luminos Fund to implement projects or other activities. Please note that the term 'Implementing Partner Organization' does not include 'Implementing collaborators – see definition below.

In the rare circumstance where sufficient evidence is presented proving that the child safeguarding and protection standards of an Implementing Partner Organization's policy meets or exceeds the standards laid out in this policy, and there is proof that the policy has been formerly approved by the Implementing Partner Organization's governance board, the organization may be exempt from signing this policy upon approval from the Vice President of Programs at the Luminos Fund.

This policy draws a distinction between Luminos Fund Staff, Providers, and Implementing Partner Organizations, and 'Implementing Collaborators' (see definition below).

- **Implementing Collaborators**: Defined as entities and individuals who receive some form of support (for example, training, advice, or materials) from the Luminos Fund but who are not performing work, providing goods or services, or acting for, on behalf of, or at the direction of the Luminos Fund. This category includes but is not limited to:
    - Government officials (for example, officials working in the ministry of education or in regional education agencies);
    - Teachers, teaching assistants and administrative staff employed either by the government or by a private entity who benefit from training and/or materials provided by the Luminos Fund.

'Implementing Collaborators' are not covered by this policy as they operate under distinct legal frameworks and institutional policies with regards to child protection and safeguarding. The Luminos Fund is committed to working closely with government and non-governmental Implementing Collaborators to strengthen their child protection and safe-guarding practices. We will do this by routinely raising the issue of child protection and

safeguarding with Implementing Collaborators; integrating training on safeguarding and child protection into any training we provide; and by using our strong and trusted relationships with government partners to push for stronger approaches to protecting children from harm. We will proactively discuss our policy with Implementing Collaborators and urge them to adhere to the same zero tolerance approach to harm or abuse of children.

This safeguarding policy outlines our commitment to preventing and responding to instances, within our organization and in the communities in which we serve, of:

- **Physical Harm**: Defined as any intentional or unintentional act causing injury or bodily harm to an individual.
- **Emotional Harm**: Defined as any intentional or unintentional act causing psychological harm to an individual inflicted through verbal or nonverbal actions, such as bullying, intimidation, manipulation, exploitation, degradation, or harassment. Please note that harassment can occur even if the perpetrator does not intend to cause emotional harm, as the impact on the victim determines whether the behavior constitutes harassment.
- **Neglect:** Defined as failure to provide for a child's basic needs by those that are responsible for the care of a child in the absence of the child's parent or guardian.
- **Sexual Exploitation or Abuse (SEA)**: Defined as any form of sexual activity where consent has not been given or is not possible, including but not limited to rape, sexual assault, and sexual harassment. Sexual harassment can occur even if the perpetrator does not intend to cause offense, as it is the impact on the victim that determines whether the behavior constitutes harassment.
- **Other forms of exploitation:** defined as the use of a person for someone else's advantage, gratification, or profit, often resulting in harm to the child. This exploitation can take various forms, including trafficking, forced labor, labor exploitation, economic exploitation, criminal exploitation and emotional exploitation.

This policy aims to safeguard and protect children (defined as individuals under the age of 18) from Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation.

4. GUIDING PRINCIPLES

- All programs, services, and operations should be conducted with children's best interests as the primary consideration.
- It is the Luminos Fund's responsibility to support the implementation of programs in a manner that minimizes risks, prevents harm, protects the rights of children, and responds to concerns with the utmost care for the well-being of all individuals.
- All individuals should be protected equally against harm and any forms of discrimination or punishment.
- Abuse of children's rights as outlined in the Convention on the Rights of the Child constitutes child abuse and is not acceptable.
- All reporting and disciplinary action resulting from concerns of Physical harm, Emotional harm, Neglect, SEA or any other form of exploitation should consider the best interests of the affected individual.
- Children are key members of communities who should be provided opportunities to express their concerns and views on matters that apply to their communities and their well-being. The Luminos Fund prioritizes participatory approaches to program design, management, monitoring, and evaluation, including children's perspectives.

5. POLICY IMPLEMENTATION STRATEGY

- Screen new and existing staff who have or will have direct contact with children for history of child abuse or sexual exploitation, including background checks, such as police clearance certificates.
- All Luminos Fund Staff, Providers, and leadership of Implementing Partner Organizations will receive a copy of the Luminos Fund Safeguarding and Child Protection Policy. Each person will be asked to sign a statement of compliance.
- The Safeguarding and Child Protection Policy will be incorporated in Luminos Fund Staff and Implementing Partner Organization orientation.
- The Safeguarding and Child Protection Policy will be incorporated into relevant sub-awards and sub-contracts and, for USAID-funded programs, the specific requirements of USAID shall be included in such agreements.
- All Luminos Fund offices and Implementing Partner Organization offices will readily make the procedures and contact information available for reporting instances of Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation. The procedures and contact information should be in English and the appropriate local languages.
- Each Luminos Fund country office shall appoint a Safeguarding and Protection Focal Point, who is the designated individual (first point of contact) for all issues related to safeguarding and protection and leads in operationalizing the Luminos Fund Safeguarding and Child Protection Policy at the country level.
- The Safeguarding and Child Protection Policy will be reviewed and modified as appropriate and updated every three years at a minimum. Training will be provided to Staff, Providers, Implementing Partner Organizations, and others as appropriate.

6. GUIDELINES

All Luminos Fund Staff, Providers, and Implementing Partner Organizations should conduct themselves in a manner that observes and aligns with the Luminos Fund Safeguarding and Child Protection Policy and the United Nations Convention on the Rights of the Child.

In addition, all Luminos Fund Staff, Providers, and Implementing Partner Organizations are required to adhere to any program-specific guidelines and Standard Operating Procedures that further outline the treatment and protection of children.

Below there are guidelines for:

- Safeguarding children from:
    - Physical Harm
    - Emotional Harm
    - Neglect
    - Sexual Exploitation or Abuse
    - Any other form of Exploitation
- Recognizing and responding to safeguarding incidents
- Protecting personal data and photographic images

These guidelines are not exhaustive, and additional actions could be deemed a violation of Safeguarding requirements. All individuals and organizations covered by this Policy should operate in a manner that upholds the protection of children and the provisions outlined in the Convention of the Rights of the Child, any Standard Operating Procedures that may be applicable, and the provisions listed below.

SAFEGUARDING AND PROTECTION

General

Luminos Fund Staff, Providers, and Implementing Partner Organizations must:

- Provide a copy of the Luminos Fund Safeguarding and Child Protection Policy and the United Nations Convention on the Rights of the Child to all new Staff and have them sign a statement of compliance.
- Follow Luminos Fund's internal reporting and disciplinary action processes for incidents of Physical Harm, Emotional Harm, Neglect, or SEA of children.
- Be aware of situations that may present risks to children and manage accordingly.
- Provide training on Safeguarding and Child Protection.
- Ensure all team members understand safeguarding and the rights of children before initiating any work with communities.
- Treat all children with respect regardless of race, color, sex, gender identity, sexual orientation, language, disability, religion, political, national, ethnic, or social origin, etc.
- Provide a welcoming, inclusive, and safe environment for all children who interact with the program.
- Comply with local, national, and international Safeguarding laws.
- Revise and update as appropriate and provide training on the Safeguarding and Child Protection Policy.

Physical Harm

Luminos Fund Staff, Providers, and Implementing Partner Organizations must take a zero-tolerance approach to incidents of Physical Harm, including corporal punishment and any form of physical discipline or punishment inflicted upon an individual as a means of correction or control. Such incidents are ineffective in promoting positive behavior change and may lead to long-term negative consequences for the individual's physical and psychological well-being. They also violate the fundamental rights and dignity of children, including their right to be free from violence, coercion, and harm.

Luminos Fund Staff, Providers, and Implementing Partner Organizations **must not engage in**:

- Hitting, spanking, slapping, or shaking.
- Forcing someone to sit or stand in an uncomfortable position.
- Any other physical action or failure to act intended to cause, or likely to result in, pain, discomfort or physical harm.

Emotional Harm

Luminos Fund Staff, Providers, and Implementing Partner Organizations must take a zero-tolerance approach to incidents of Emotional Harm. Emotional Harm refers to any action, behavior, or communication that causes distress, humiliation, fear, or psychological trauma to an individual.

Luminos Fund Staff, Providers, and Implementing Partner Organizations **must not engage in**:

- Verbal abuse, such as insults, threats, or derogatory language.

- Bullying or harassment, including cyberbullying and exclusionary behavior.
- Manipulative or coercive tactics aimed at controlling or demeaning others.
- Intimidation or humiliation through gestures, body language, or non-verbal communication.
- Hiring children for domestic or any other labor that is inappropriate for their age or development, interferes with their education or play, or places them at risk of harm.
- Any other behavior undermining a child's self-worth, dignity, or mental well-being.

Neglect

Luminos Fund Staff, Providers, and Implementing Partner Organizations must provide for the basic needs of, and sufficiently supervise, children in a Luminos Fund program while they are in their care.

Luminos Fund Staff, Providers, and Implementing Partner Organizations **must not engage in**:

- Failure to meet a child's need for food, clothing, shelter, or safety.
- Leaving a child in an unsafe space.
- Failure to seek necessary medical attention for a child.

Sexual Exploitation or Abuse (SEA)

Luminos Fund Staff, Providers, and Implementing Partner Organizations must take a zero-tolerance approach to incidents of SEA. SEA refers to any form of sexual activity or behavior perpetrated against an individual without their consent or under coercive circumstances. We acknowledge that incidents of SEA are enabled by unequal power relations, which are often gendered. It is a high priority for the Luminos Fund to create a culture of gender equality in all of our work. SEA constitutes acts of serious misconduct and are, therefore, grounds for disciplinary measures, including summary dismissal.

Luminos Fund Staff, Providers, and Implementing Partner Organizations **must not engage in**:

- Sexual assault, rape, or attempted rape. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense.
- Sexual harassment, including unwelcome advances or propositions, requests for sexual favors, or other verbal or physical conduct of a sexual nature.
- Exploitation of vulnerabilities for sexual purposes, such as offering goods, services, or opportunities in exchange for sexual acts.
- Using inappropriate language—whether of an offensive, discriminatory, demeaning, abusive, or sexual nature—when speaking with or while in the presence of a child.
- Acting in a sexually provocative manner or engaging children in any form of sexual activity, including paying for sexual services.
- Holding, kissing, cuddling, or touching a child in an inappropriate, unnecessary, or culturally insensitive way.
- Sleeping in the same room or bed with a child with whom they are working.
- Accessing or creating sexually abusive images of children.

Other Forms of Exploitation

Luminos Fund Staff, Providers, and Implementing Partner Organizations must take a zero-tolerance approach to any other forms of exploitation which include but are not limited to labor exploitation, economic exploitation, criminal exploitation, and emotional exploitation.

Luminos Fund Staff, Providers, and Implementing Partner Organizations **must not engage in**:

- Engaging children in labor other than reasonable classroom responsibilities (such as refilling water containers, guiding visitors around the classroom, or cleaning the blackboard)
- Seeking financial payment from children (or their parents)
- Involving children in any illegal activities
- Coercing children to give false statements to supervisors or evaluators about the Luminos Fund Program

DEALING WITH SUSPECTED SAFEGUARDING OR CHILD PROTECTION INCIDENTS

Recognizing

Luminos Fund Staff, Providers, or Implementing Partner Organizations should have sufficient knowledge of this policy to recognize incidents of Physical Harm, Emotional Harm, Neglect, or SEA.

Reporting

If any Luminos Fund Staff reasonably suspects Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation of a child or receives a report of Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation perpetrated against a child, the Staff member must make an immediate report to his or her direct supervisor. If reported to the supervisor, the supervisor then becomes responsible for ensuring that the suspected Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation is reported to the Country Manager/Director, who must be informed of the report of the incident within 24 hours of receiving it. The Country Manager/Director must report the incident by email to the Luminos Fund Safeguarding and Child Protection Global Lead (copying Luminos Fund CEO and Vice President of Programs) within 48 hours of the incident first being reported.

If any Provider or Implementing Partner Organization reasonably suspects Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation of a child perpetrated by a Luminos Fund Staff, Provider, and/or Implementing Partner Organization, an immediate report must be made to their primary Luminos Fund point of contact. The point of contact then makes an immediate report to his or her supervisor. If reported to the supervisor, the supervisor then becomes responsible for ensuring that the suspected Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation is reported to the Country Manager/Director, who must be informed of the incident within 24 hours of it occurring. The Country Manager/Director must report the incident to the Luminos Fund Safeguarding and Child Protection Global Lead (copying Luminos Fund CEO and Vice President of Programs) within 48 hours of the incident occurring. The Luminos Fund Safeguarding and Child Protection Global Lead is responsible for approving the proposed action/next steps for any suspected case of abuse, including as appropriate reporting to local law enforcement authorities, taking disciplinary measures against employees up to and including termination, and terminating agreements with Providers and Implementing Partner Organizations.

Luminos Fund Staff, Providers, and Implementing Partner Organizations should use their judgment to determine the credibility of information they receive concerning potential incidents of Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation against children. Staff members may discuss

the allegations and facts with their supervisors when in doubt but should keep in mind that waiting for more information to turn up may place a child at greater risk of harm.

Luminos Fund will ensure that all children are given training early in the year on how they should report any concerns. If any child or beneficiary is a victim of or suspects Physical Harm, Emotional Harm, Neglect, SEA, or any other form of exploitation of a child, they should report it immediately to their classroom facilitator, staff from an Implementing Partner Organization, a Luminos Fund staff member, a member of the Community Engagement Committee, a member of the Parental Engagement Group or any other trusted adult. Any such person receiving a report of a potential safeguarding incident is expected to report the concern up the chain of command and the report should reach the country manager/director within 24 hours of receiving the report. The Country Manager/Director must report the incident to the Luminos Fund Safeguarding and Child Protection Global Lead (copying Luminos Fund CEO and Vice President of Programs) within 48 hours of receiving the report. The Luminos Fund Safeguarding and Child Protection Global Lead is responsible for approving the proposed action/next steps for any suspected case of abuse, including as appropriate reporting to local law enforcement authorities, taking disciplinary measures against employees up to and including termination, and terminating agreements with Providers and Implementing Partner Organizations.

If a Luminos Fund Staff, Providers, and Implementing Partner Organizations suspects Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation of a child whom he or she comes into contact with during his or her personal time (outside of Luminos Fund), the Staff member, Provider or Implementing Partner Organizations is encouraged, but not required, to report the matter as a private citizen. However, if a Luminos Fund Staff, Provider, and/or Implementing Partner Organization encounters a situation involving a Luminos Fund Staff, Provider, and/or Implementing Partner Organization during his or her personal time, they are required to report the suspected Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation in accordance with the processes outlined above.

Willful failure to report a case of Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation that should be reported is a violation of Luminos Fund's Safeguarding and Protection Policy and is grounds for disciplinary action or termination. Furthermore, anyone reporting a case shall not be threatened, discriminated against, removed, terminated, or otherwise subjected to retaliation or, in the case of an employee, be subjected to adverse employment consequences, as a result of such report under the Luminos Fund Whistleblower Policy.

Luminos Fund commits to fulfill specific funder-required reporting requirements as well as official reporting requirements (to police and/or government agencies) within the country. For specific reporting procedures in each country of operation, please contact the country safeguarding focal point and/or refer to country-specific guidelines.

The Luminos Fund CEO is ultimately responsible for Safeguarding matters, with support from the team, Boards, and others as needed. However, neither the individual nor the institution will be held liable for honest mistakes and good faith efforts in interpreting the often-difficult allegations and facts involved in these cases.

Investigating

An investigation into any allegations of Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation should be led by the country team safeguarding focal point in conjunction with the country manager. The investigation should be initiated immediately and advanced expeditiously to a successful and comprehensive conclusion, with continuous updates to Luminos Fund senior leadership as appropriate. Evidence should be gathered from learners, staff, and communities as appropriate.

Recording

Each Safeguarding and Protection incident needs to be documented by noting the different stakeholders involved, specific description of the event and witnesses, whether there was a referral to an external agency, and justification of the action that was taken. Incidents should be clearly classified as either:

- **Safeguarding/Child Protection Incident**: These are incidents which are alleged to be direct violations of the Luminos Fund Safeguarding and Child Protection Policy – i.e. alleged actions perpetrated by Luminos Fund Staff members, Providers, and/or Implementing Partners.
- **Community Incidents**: Children's wellbeing is a paramount concern for the Luminos Fund and therefore we encourage Luminos Fund Staff members, Providers, and/or Implementing Partner Organizations to report any incidents of harm or abuse of children which they become aware of in the community that is perpetrated by individuals who are not governed by this policy (parents, community members, etc.).

Every confirmed Safeguarding/Child Protection Incident and corresponding investigation and action is recorded as an official memo by the Luminos Fund Country Manager/Director using the Luminos Fund Safeguarding and Child Protection Incident Reporting template. A SharePoint link to the completed incident report should be shared over email with the Global Safeguarding Lead within one week of the incident being raised.

The Luminos Fund CEO is responsible for updating the Luminos Fund Board of Directors on any safeguarding/child protection incidents on an annual basis.

Responding

If any Luminos Fund Staff, Provider, or Implementing Partner Organization identifies or suspects a case of Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation they should remain fact-based and non-judgmental. The first priority is to ensure the child is removed from the source of harm or that the source of harm is removed from the situation. The individual should remain calm and show concern but try not to act overly alarmed.

If a child himself/herself comes forward to share an incident of Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation, the Luminos Fund Staff or Implementing Partner Organization should respond with care and concern, assuring the child know that what happened is not his or her fault. Utmost care must be taken to protect the individual and listen without passing judgment.

The Luminos Fund will do its utmost to support the well-being of any child who has been a victim of a Safeguarding/Child Protection Incident. The appropriate support for a victim will be determined on a case-by-case basis by Luminos Fund Staff in consultation with the child's parents or caregivers. Support may include providing counselling or medical treatment. Luminos Fund Staff will also continue to monitor the well-being of the child and make every effort to ensure that they are well and continue to engage in their studies.

Disciplinary Actions

Perpetration of Physical Harm, Emotional Harm, Neglect, SEA or any other form of exploitation by Luminos Fund Staff, Providers, or Implementing Partner Organizations may result in the termination of any current agreement and/or relationship with the Luminos Fund, whether through formal dismissal, termination of contract, or otherwise. Termination of agreements will be determined by the Luminos Fund's CEO, in consultation with the Board of Directors. Luminos Fund leadership will consider the nature of the misconduct, the entity's response, and the ability to prevent such future abuses.

PROTECTING PERSONAL DATA AND PHOTOGRAPHIC IMAGES GUIDELINES

Data Record Retention and Storage

The Luminos Fund only collects and maintains records and files containing personal information of the type and for the length of time reasonably necessary to accomplish the Luminos Fund's legitimate business purposes or to comply with other state or federal regulations and under local applicable law.
Individual data refers to paper or electronic information containing personally identifiable information collected for our programmatic or operational purposes. This data is considered confidential. Luminos Fund only keeps those records about students we serve to provide the level of education program the students need in our classrooms.

Terminated employees must return all records containing personal information, in any form, that may be in the former employee's possession at the time of such termination, and such employee's physical and electronic access to personal information shall cease when said employee departs.

Luminos Fund has designated the Finance Director as the Data Security Coordinator to implement, supervise, and maintain information security. The Data Security Coordinator must dispose of personal information when no longer needed by Luminos Fund, in compliance with United States law, specifically Massachusetts General Laws c. 93I. Paper documents containing personal information shall be redacted, burned, or shredded so that personal information cannot be read or reconstructed practicably. Electronic and other non-paper records will be destroyed or erased so personal information cannot be read or reconstructed practicably. The Data Security Coordinator may contract with a third party to dispose of such personal information.

Access to records containing personal information shall be limited to persons reasonably required to know such information to accomplish Luminos Fund's legitimate business purpose or to enable Luminos Fund to comply with other state or federal regulations.

Access to electronically stored personal information shall be limited to those having a unique login ID, and passwords must be changed periodically.

Employees may not remove from the office paper files containing personal information except in rare circumstances and with the approval of their supervisor.

Capture and Use of Images

Luminos Fund Staff, Providers, and Implementing Partner Organizations must:

- Understand and apply local customs and context when reproducing personal images.
- Obtain written consent (using the Luminos Fund Release Form) from the parents or guardians of children before recording, photographing, or filming any individual and explain in the consent how any images will be used in promotional materials in a language that is understood by them.
- Ensure photographs and footage present children in a dignified, appropriate, and respectful manner.
- Obtain continued consent for significant change or additional use of photographs or video footage of individuals.
- Respect any child's decision to refuse to be interviewed or photographed.
- Avoid negative, degrading, or stigmatizing images of children
- Before recording, photographing, or filming any individual, introduce the Luminos Fund and the purpose of the request to capture images and/or video footage.

Luminos Fund Staff, Providers, and Implementing Partner Organizations must not:

- Take photographs or video footage of children without appropriate permission.
- Use images of children in a manner that does not accurately portray the context or that has not been consented to by the parent or guardian.
- Share photographs of children publicly using the individual's full names, specific locations, or contact information, or at all without the written consent of the parent or guardian.
- Portray children in an undignified or disrespectful manner.

7. SAFEGUARDING AND PROTECTION OF ADULTS

This policy focuses on our safeguarding and protection approach for children who are particularly vulnerable to harm and abuse. However, for the avoidance of doubt, Luminos Fund Staff, Providers, and Implementing Partner Organizations must also take a zero-tolerance approach to Physical Harm, Emotional Harm (including bullying and/or harassment), SEA or any other form of exploitation perpetrated against adults while carrying out work in their professional capacity.

Luminos Fund Staff, Providers and Implementing Partner Organizations should take particular note that sexual harassment is not tolerated within Luminos Fund Programs. Sexual harassment can occur even if the perpetrator does not intend to cause offense, as it is the impact on the victim that determines whether the behavior constitutes harassment.

If any Luminos Fund Staff, Provider or Implementing Partner Organization is found to have perpetrated Physical Harm, Emotional Harm, SEA or any other form of exploitation against an adult during the course of their work with the Luminos Fund, this may result in the termination of any current agreement and/or relationship with the Luminos Fund, whether through formal dismissal, termination of contract, or otherwise.

8. STATEMENT OF COMPLIANCE

I have received a copy of, and have read and understood, the Luminos Fund's Safeguarding and Child Protection Policy and Code of Conduct. I understand the United Nations Convention on the Rights of the Child and the Luminos Fund's commitment to upholding standards of Child Protection and Safeguarding and minimizing the risk of abuse.

I understand that adherence to this policy is required and that failure to do so would constitute a breach of any current agreement or work with the Luminos Fund.

By: _____

Name: _____

Title: _____

Date: _____