Tip Sheet
Individualized Child Protection Interventions (ICPIs)
August 2023

A. Background

On February 6, 2023, two major earthquakes with the epicentre of Kahramanmaraş happened in Türkiye's South-East Anatolia and Eastern Mediterranean region and 11 provinces are declared as earthquake affected zone. Infrastructure, shelters, market conditions, financial service providers and livelihoods opportunities have been disrupted as a result of the earthquake. The overall population affected is approximately 15.6 million people, including nearly 1.8 million registered refugees and nearly 5.6 million children. The Government of Türkiye quickly mobilized national and international assistance and has been leading a robust humanitarian response. This catastrophe has not only caused physical harm but has also forced people to leave their homes. Around 999,200 individuals have relocated to other provinces for safety, while a small proportion of 257,015 people have been able to return. Structural damage is extensive, with an estimated 316,000 buildings reported damaged, impacting the living conditions of thousands of people. The displacement caused by the earthquake has led to the establishment of new settlements. These include around 293 formal tent sites and 206 container sites across the provinces. The number of people now living in these provisional settlements is striking, with approximately 1,245,180 individuals living in tents, and 223,942 in containers. Humanitarian needs remain significant, with sustained support required for affected children, adolescents, and their families/caregivers in both the earthquake-affected provinces and the provinces hosting and providing services to earthquake-affected people. Around 2.6 million people currently living in formal and informal sites are likely to continue doing so for a while; raising concerns about shelter adequacy, access to water, sanitation and hygiene, health, and child protection services, especially for those facing prolonged stays and in precarious living conditions.

Access to education has been hampered for nearly 4 million children, including 350,000 refugee and migrant children. Of the 450,000 refugee children who remain out of school nationally, more than 240,000 reside in the affected provinces. Education resumed in all earthquake-affected provinces by the end of April without mandatory attendance requirements, but attendance levels in Hatay and Malatya remained below 50 per cent. School registration transfers were allowed from the earthquake-affected areas. However, for the children under temporary protection, their lack of ID or official travel permits became another barrier to their access to education. The situation of affected children appears very fragile, also because of high levels of non-attendance at school. Prior to the earthquake, in the affected region more than 3,7 students were attending more than 11,000 schools that were changed dramatically by the earthquakes. Children seem to see their food intake reduced more than adults (by 3 per cent more), as for other essential service/items expenditures (by 8 per cent more) and medical care (by almost 12 per cent more). Boys and girls are highly exposed to labour (32 per cent), marriage (17 per cent) and begging (16 per cent).[1] Functional learning spaces, accommodation for teachers, and transportation for students and teachers remain of great need across all affected areas. The psychological impact on children, adolescents, and families/caregivers remains high and will have long-lasting negative consequences, including due to exposure to abuse, and violence (including gender-based violence), and their protection remains paramount as well as ensuring there are safe and accessible channels for them to report abuse and exploitation.

According to MoFSS data, as of 7 April March, 1.915 children have been identified and registered as unaccompanied or separated from their parents or caregivers. Out of which, 1.783 have been reunified with their families and 72 have been confirmed orphans and are under state care. 23 UASC are still under FTR process.[2]

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[1] Humanitarian Transition Overview, Türkiye Earthquake Response (August 2023), OCHA. https://reliefweb.int/report/turkiye/humanitarian-transition-overview-turkiye-earthquake-response-august-2023

[2] https://www.aa.com.tr/tr/gundem/bakan-yaniktan-refakatsiz-cocuklara-iliskin-aciklama/2866724

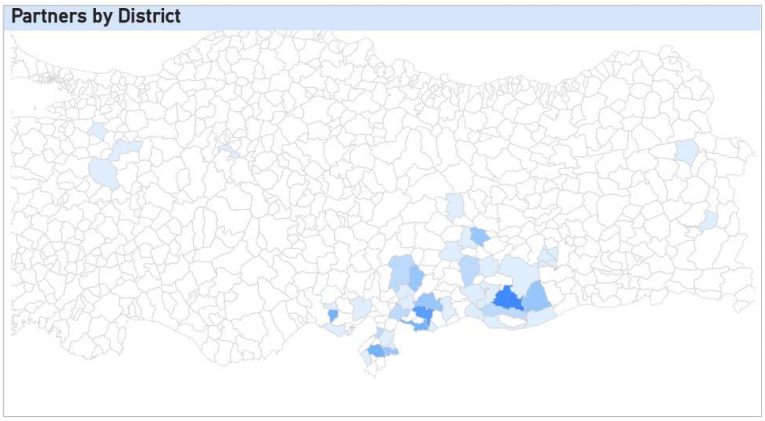
Between April and early June 2023, 206 structured observations were recorded by Protection Sector Earthquake Field Observation Tracking The majority of these observations were conducted in Hatay (39%) and Kahramanmaras (32%), with lesser proportions in Malatya (11%) and Adiyaman (10%). The observations covered all types of settlements, including formal tented sites (47%), spontaneous/informal sites (48%), and formal container sites (4%), mostly hosting refugees. According to the recorded observations:

- Affected women at risk were identified as the most vulnerable group, followed by people with disabilities. Other vulnerable groups include older persons, persons with chronic diseases, children at risk, and persons who lost family members during the earthquake. Harmful coping mechanisms observed included reduction of food intake, accepting high-risk or exploitative jobs, family separation, and child-early and forced marriage.
- The most prominent protection issues were non-attendance of school and mental health and psychosocial support (MHPSS) needs. These were followed by social tensions, documentation issues, security/safety inside the site, gender-based violence (GBV), and housing, land, and property (HLP) issues.
- The most urgent needs across the visited sites were water, sanitation, and hygiene (WASH), hygiene kits, livelihoods, shelter, and access to food. However, the ranking of these needs varied depending on the location.
- Only 32% of affected individuals reportedly knew how to access services corresponding to their needs. Existing community structures were either inactive, passive, or disrupted as a result of the earthquake, according to 56% of respondents. Men were consulted more often than women, and there was a low representation of women in community structures or in the planning/implementation of assistance.
- Compared to the immediate response phase of the disaster, partners observed that need for cash assistance has increased on the side residents and local economy, especially in the current context in which the need for cash assistance has increased compared to the in-kind distribution needs, which were higher during the immediate aftermath of the earthquakes.

While the response shifted from in-kind distribution during the immediate aftermath of the earthquakes to cash assistance in the medium and long term, protection partners have been working in close collaboration with MoFSS institutions to identify individuals at risk and provide with individual protection interventions in the forms of cash, voucher and in-kind assistance that are integrated to overall protection and case management programs. According to OCHA's "Türkiye Earthquake Response Partner Operational Presence[3]" Update, 19 implementing partners[4] reportedly provided cash/in-kind assistance to meet protection needs of 26,2397 individuals between February and June 2023. Below map showcase the areas of operations for partners implementing cash/in-kind assistance for protection outcomes.

[3] https://reliefweb.int/report/turkiye/turkiye-earthquake-response-2023-partners-operational-presence-3w-31072023

[4] ASAM, Bonyan, Concern Worldwide, DRC, Gokkusagi Association, HRDF, IOM, Malatya Yaşam, Mercy Without Limits, MSYD-ASRA, NSPPL, Sanliurfa Metropolitan Municipality, STL, TKV, UNFPA, UNHCR, UNWomen, UOSSM Turkey, WHH.



B. Objective

The primary objective of this document is to introduce and provide guidance on Individualized Child Protection Interventions (ICPIs), focusing on the utilization of cash, voucher, and in-kind assistance for child protection outcomes. ICPIs are different types of services provided for child protection cases. This document was developed to complement Individual Protection Interventions Guideline from child protection point of view. Similar to the IPIs, ICPIs are distinct from non-sectoral CVAs including MPCA, as they have a direct relation with child protection outcomes and are often achieved through holistic case management. The ICPI model seeks to ensure a comprehensive response to complex child protection risks, working in tandem with other case management interventions. Special attention is given to the responsible handling of cash assistance, communication with children, and integration with overall protection responses.

In addition to outlining the principles and methods of ICPIs, the document also provides various risk mitigation measures aiming to:

- ensure child-friendly communication
- encourage child participation and involvement
- safeguard CVA disbursement
- implement training and referrals
- enforce data protection
- align with best practices
- adhere to child protection case management guiding principles

C. Introduction

The evidence shows that resorting to negative coping mechanisms that are harmful to children, such as hazardous child work, early marriage and early pregnancy, may be in part motivated by household livelihood pressures. While sectoral cash programs focus on addressing basic needs, food security, education and livelihood components, it is also important to integrate CVA into child protection case management to address complex child protection concerns, especially in Türkiye context characterized by socio-economic deterioration, displacement, and natural disasters. Combining CVA under ICPI with overall protection response, such as PSS, training and awareness raising focused on behavioral changes, case management, legal support and outreach, aims to result in a more sustainable protection impact that goes beyond the duration of cash transfer. These programs aim to address mainly complex child protection risks, including child labor, street connected children, child marriage and other risks that require a comprehensive response package through case management. Therefore, it is important to note that IPI is not a stand-alone support to the family/children but a complementary form of assistance that is being provided in parallel with other case management interventions. To ensure linkages to other services, cash assistance is provided usually alongside other educational or child protection activities (or formal school where applicable). The support that is given to the child can also be linked with further in-kind support, which can include safety

equipment, registration in vocational training centers, psychosocial support, referrals to specialized services as needed, and other actions that will ensure a comprehensive action plan is in place to ensure the child's wellbeing is met.

The power of IPI often comes from flexibility in its design as the delivery mechanism, amount and the frequency of assistance provided under CfP, SNF and IFS can be adjusted based on protection risk analysis of each child protection cases. IPI also enables targeting caregivers/legal guardians to have positive affect on children and promotes the best interest of the child through *financial proxy/custodian agreement (Annex-1).* In exceptional circumstances children headed households and unaccompanied and separated children can also be the direct recipient of the assistance. However, considering that MoFSS is the only authorized institution to carry out the social work interventions and follow-ups for unaccompanied and separated children, any other organization cannot support UASC with accommodation, financial and other assistance, unless the ministry coordinates these interventions.

Acknowledging the leading role of MoFSS in child protection, prerequisite of aligning with laws and regulations, as well as present protection safety nets, the principled implementation of IPI for child protection cases should be complementary to the statutory services, filling gaps in response, and creating exit strategies with the safety net and nationwide social assistance programs considering the best interest of the child. In this context, cash assistance for child protection should be provided within the case management intervention during the case planning step that also includes a variety of other services including referrals and direct specialized protection support. Cash should not replace the actual case management process, instead can be considered an appropriate modality to address specific protection threats alongside or in combination with other modalities (protection services, case management, etc.). Additionally, presence of Individual Facilitative Support (containing translation, transportation, accompaniment, family unity counseling, information counseling, document issuing fees should be leveraged to remove barriers for children to access services and rights.

This guide elucidates the critical role of IPI in child protection case management. It sheds light on fundamental principles and considerations, and also clarifies the underlying reasoning for employing such intervention and assistance within child protection programs that are interconnected with national safety nets and social protection schemes.

D. Individualized Child Protection Interventions (ICPIs)

A central component in child protection is ICPIs, which are frequently deployed to achieve child-centered outcomes in a holistic fashion. These interventions play a dual role by contributing to sector-specific outcomes (such as Cash for Protection) as well as multisectoral outcomes (such as Special Needs Funds). Many of these contributions either have a direct influence or induce secondary effects on child protection.

Special Needs Funds (SNF) are particularly instrumental in fostering child protection outcomes. SNF is provided in the forms of cash, voucher and in-kind. SNFs contribution lies in the prevention of risks and vulnerabilities associated with child protection by mitigating the economic frailty of households. In doing so, SNFs pave the way for the realization of outcomes in other sectors. In contrast, Cash for Protection (CfP) specifically focuses on achieving child protection outcomes by curbing child labor, preventing family separation, and mitigating various forms of violence against children.

In addition, Individual Facilitative Support (IFS) offers a comprehensive package of services aimed at eliminating barriers to access. This includes providing information counseling, translation services, transportation, and accompaniment. Furthermore, IFS serves as a bridge, facilitating a smooth transition for child protection actors through mandatory reporting, and making referrals to statutory services and social assistance programs.

Lastly, it is vital to recognize that the efficacy of CfP, SNF, and IFS is strongly dependent on the existence of a well-structured child protection case management process respecting key child protection case management principles. Such a process is crucial for the successful implementation and monitoring of result-based protection interventions.

E. Eligibility Criteria

It is important to consider households or individual children at risk when choosing the targeting approach and applying different eligibility criteria set under Cash for Protection, Special Needs Funds and Individual Facilitative Support, as sub-models of ICPIs.

In order to be eligible for cash for protection under child protection case management, three criteria must be met.

- Eligible cases must have an urgent protection need related to child protection outcomes, such as a sudden and unexpected shock, or have child protection risks that is financially based, such as child and early forced marriage, child labor, and out of school children, for which a CVA can achieve the intended outcome. It is important to note that the frequency of payments for child protection cases should be decided through case planning and the monitoring and follow-up of the case plan that often measured the efficiency and effectiveness of CVA for child protection outcomes.
- Cases must demonstrate limited financial capacity to cope - yet, the cash for protection should not be used to solely cover basic needs or replace one-off or multiple cash interventions related to food safety, shelter, etc, that is already existing, when all of those could be covered through non-sectoral CVA including MPCA.
- Cases in need of assistance that cannot be covered through SNF and referrals to MPCA.

In order to identify targeted mitigation strategies and protections, factor following into decision making on eligibility:

- Does excluding children/caregivers from receiving ICPI leave them without access to essential services and assistance?
- What protections can be put in place to minimize harm associated with cash assistance?
- What are the particular concerns or compounded risks for children?

F. Guiding Principles

All humanitarian practitioners, including CVA and child protection actors, and non-specialized actors of all different humanitarian sectors should be familiar with the Sphere Standards and Principles. Integrating child protection principles throughout the program cycle can help ensure that protection risks are mitigated, prevented and responded, and benefits are mainstreamed as part of all humanitarian assistance and protection.

In line with the UNHCR's global Guidance on Child Protection Outcomes through Cash Based Interventions, the provisions of ICPI needs to consider and take into consideration the specific risks and contexts in which the intervention is provided. It further outlines how to ensure that children of different age groups, sex and specific needs should benefit from cash programs if child protection considerations are considered in all stages of the program cycle in order to prevent or mitigate any potential harm. It is therefore pre-condition that all actors in the refugee response providing cash shall ensure that child protection principles are integrated at all stages of the cash-based intervention. Some of the most relevant child protection principles in the context of CVA include:

Do No Harm: conduct actions, procedures and programs in a way that does not place children at further risk of harm, including as a result of unintended consequences. Any actor planning to introduce and provide cash assistance should therefore consider specific risks and benefits associated with the provision of cash assistance for children in Türkiye and its potential positive and negative impact on children.

Right to survival and life: children have the right to life and access to services, including adequate food; CP staff shall ensure that children have access to food, sanitation and water. The provision of cash may address basic needs of refugee children as well as be implemented to reduce and mitigate specific risks, including separation from family members, access to education, gender-based violence, health and psychosocial support.

Best Interests of the Child: shall be a primary consideration in all decisions and actions undertaken for and with children including during all humanitarian procedures, i.e., all activities must serve or not be standing in contrast to the child's physical, social/relational and emotional well-being. All actors of the refugee response implementing CVA are therefore held accountable to ensure that potential positive or negative impacts resulting from the implementation of CVA are assessed and considered to ensure the child's wellbeing.

Equity and non-discrimination: promote an inclusive and non-discriminatory approach to the protection of refugee children, irrespective of their nationality, age, sex/gender, gender identity, race or place of residence. All children who are eligible for cash assistance shall receive the same entitlements without discrimination based on nationality or background.

Inclusivity/AGD: ensuring equal access to resources for children with specific risks or marginalized children, considering age, sex/gender, gender identity nationality consideration of boys and girls, as well as children with disabilities and children with development needs.

Urgency: ensure prioritization of and immediate response to protection risks for children including prioritizing the most at-risk children. This can include children separated from parents or other family members and caregivers, children with disability without access to support, children exposed to violence, abuse or severe neglect, or other marginalized groups of children within the community.

Child Participation: cash programs should be built around the needs expressed by children of different age groups and different sex and gender identity. CVA should also promote the participation of children in accordance with their age, gender, maturity and capacity. Partners providing cash should therefore ensure children are consulted prior to the targeting being undertaken and also include them in post-distribution monitoring activities.

G. General Considerations

The below outlines key considerations and steps that child protection case management actors shall consider and follow during the provision of Individual Protection Interventions for children:

Assessment of Child Protection Risks

Depending on the intended recipient of ICPI (either adult caregivers or direct recipient children -UASC & CHH), child protection actors shall scrutinize the below factors for best interest assessment:

- Dependency ratio (working adults/dependents in the household)
- Ability to meet basic needs (expenditure/income categories, ability to cover own and children's basic needs)
- Reliance on harmful coping strategies (children involved in covering basic needs, negative coping mechanisms and their root causes)
- Household tension (relationship between children and other HH members, feeling of safety, risk of neglect, psychological violence, or other harmful behaviours.
- Preference and priorities (preferred way of being assisted – transfer modalities i.e. cash, voucher, in-kind, card & the intended use of the cash)
- Safety concerns related to cash and vouchers
- Family or community support

Mandatory Reporting Laws and Policies

When implementing child protection case management programs and using ICPI to address a child protection concern/risk, it is important to follow-up mandatory reporting laws and policies to ensure alignment with national child protection system set up by Ministry of Family and Social Services, as a mandated lead agency for child protection in Türkiye. The principles of '*do no-harm and the best interests of the child'* should always be considered when notifying.

Social Services Law No. 2828, Article 3-b, defines a "Child in need of protection" as follows:

- If their physical, mental or moral development or personal safety is in danger;
- Motherless or fatherless or both,
- Unknown mother or father or both,
- Abandoned by mother or father or both,
- Neglected by the mother or father; and made vulnerable to all kinds of social dangers and bad habits, such as prostitution, begging, using alcoholic beverages or drugs, etc. and drifting away

Child Protection Law No. 5395, Article 3-a (1) defines a child in need of protection as; "A [child] whose physical, mental, moral, social and emotional development and personal safety are at risk, who is neglected or abused, or is a victim of crime." *Child Protection Law No. 5395* recognizes the right of all children to protection, including the right to receive social assistance. The Law also establishes the Ministry of Family and Social Services (MoFSS) as the lead agency for child protection in Türkiye.

Child Protection Law No. 5395, contains most of the principles of Convention on the Rights of the Children, and defines children '' as individuals under age of 18''. In Article 6/1-a of the *Turkish Criminal Law,* child is defined as ''person who has not yet completed the age of 18''.[2]

Laws have been prohibiting sexual assault including rape, marital rape, forced and minor (at age of child) marriage (indicated below), sexual harassment, physical assault and threat as well as honor killing. According to the *Turkish Civil Law,* the legal age of marriage in Turkey is 18. However, 17-year-old persons (those who have passed into 18) are legally entitled to marry with consent of parents or legal guardians. A 16-year-old child can marry 'in exceptional circumstances' with a Court Decision and the consent of his/her legal guardian. The law covers all women regardless of marital status or nationality.

It should be emphasized that all personal data can be recorded by taking the consent of the person. According to *Law on Protection of Personal Data* Article 5 and Paragraph 1, ''Personal Data cannot be processed without consent of the person''. According to Article 6 of the *Law on the Protection of Personal Data*; The race, ethnicity, political view, philosophical belief, religious, sect or other beliefs, and clothes, membership of association, foundation and union, health, sexual life, criminal conviction or security measures, biometric and genetic data are sensitive data. (2) It is forbidden to process personal data without the explicit consent of the person.

Turkish Criminal Law 102- 103 and 104; In terms of sexual abuse crimes, the concept of child is handled in three different categories:

- Sexual abuse of children who have not yet completed age of 15,
- Sexual abuse of children who have completed the age of 15 but have no ability to perceive the legal meaning and consequences of the act directed against them,
- Sexual abuse of children between the ages of 15-18 based solely on coercion, threats, deception or any other reason affecting the will.

Child Protection Law No. 5395, Article 6 defines the obligation of notification to Social Services and Child Welfare services. Accordingly. "Judicial and administrative authorities, law enforcers, health and education institutions and non-governmental organizations are obligated to notify children, who are in need of

protection, to the Social Services and Child Welfare Service. Child and caregivers can apply to Social Services and Child Welfare Service to take the child under protection.

Provision of ICPI

As a fundamental rule, the ICPI including cash for protection should not be handed out to a child; rather cash should be paid to families/caregivers or to a duly designated person who is above 18 years of age who agrees to the objective of the assistance. In the cases families and legal guardians are the recipient of the cash assistance, it is imperative to sign *Financial Proxy/Custodian Agreement (Annex-1).* As an exception, an individual who is identified as being at risk and satisfies the criteria for cash assistance but who is under the age of 18 is eligible to receive a cash transfer without parent/guardian/adult supervision (In case where the child is the head of the household and/or unaccompanied and separated, exceptions could be made following the best interest assessment as per *Child Protection Sub Cluster Case Management SOPs.* It is important to note that any type of assistance for UASC relies on MoFSS's mandate). As a general principle, permission to proceed with providing assistance is sought from both the child and their caregiver (e.g., parent) unless it is deemed that the involvement of the caregiver/adult is against the best interest of the child. The child does, however, remain the rights holder and is expected to be engaged and participate in the discussions of support.

In deciding the provision of assistance, it is important to use *IPI Assistance Approval Forms* and ensure:

- Assess development capacity by age, factoring in maturity and life experience and role of the child within the household
- Actively identify and assist children and their caregivers with registration
- Facilitate access to education and health services
- Enroll children in child protection case management based on prioritization and risk assessment (Child Protection Sub Sector Child Protection Case Management SOP)
- Provide children with basic financial literacy or life skills training

Delivery Mechanism Selection

The assistance provided through ICPIs shall be delivered in the forms of cash, voucher or in-kind. It is important for child protection actors to use *IPI Assistance Approval Forms*. The delivery mechanism selected should afford children/caregivers the most dignity and flexibility of choice. Consult children on their past experiences, their level of capacity and literacy, access to needed technology, and their preferences. Be mindful of certain challenges or additional needs, such as

- Does the **mechanism allow children to adequately and reasonably access the cash assistance**, in a safe and secure manner, including their transportation to and from the distribution site?
- **Will the mechanism allow the children choice and flexibility** in purchases and selection? Are there any **additional regulations needed for children** to be able to access cash?
- Are there any **additional regulations needed for children** to be able to access cash?
- Are the **financial service providers sensitized** on humanitarian perspective? Do they meet compliance criteria including but not limited to child safeguarding, accountability and feedback, language proficiency, accessibility principles, as well as ability to provide services for vulnerable groups?

Complementarity with national social protection safety nets and child protection policies

The social assistance system in Türkiye consists of various programs administrated by different General Directorates of Ministry of Family and Social Services (MoFSS). Social assistance programs' eligibility criteria, target groups and transfer amounts vary based on program objectives, level of beneficiaries' vulnerabilities as well as the assessment of the social workers who provide service under the Ministry and its provincial entities – Provincial Directorate of Family and Social Services (PDoFSS). Social Safety Nets in Türkiye are administered by Ministry of Family and Social Services (MoFSS) through Social Solidarity and Assistance Foundations (SASFs) and Provincial Directorates of Family and Social Services (PDoFSS). SASFs have an economic and neediness-based assessment, targeting the families in need of basic need

support; PDoFSSs have a mandate to focus on protection along with socio-economic vulnerability. The types of available assistances are:

- Social Assistance Programs of DG Social Assistances of MoFSS
- Family Support Program of DG Social Assistances of MoFSS
- Social and Economic Support of DG Child Services of MoFSS

ICPIs plays an important complementarity and bridging role to the national social protection safety nets. In this context, CfP and SNF aims to provide immediate resources to mitigate, prevent and respond child protection issues, while IFS, along with the mandatory reporting procedures facilitate children's access to social protection systems. Integration of the ICPIs into a holistic protection response, therefore, aims to address immediate protection risks through enhancing protective factors, in parallel with extensive referrals to the statutory services.

Accountability and Monitoring

Communication with children according to their age, capacity and in children-friendly ways must be prioritized throughout all case management steps and IPI decision making process.

Establish communication plans and systems for children. Communicate to children the main objectives and requirements of the program. If the recipient is a child, all program details need to be communicated to them clearly, ensuring they have understood the program, what their responsibilities are, and agree to undertake them. Provide children the opportunity to ask questions. Children may need more frequent communication and reminders. Ensure that changes in the program are communicated and understood. If possible, have more than one mode of communication for children.

Child-friendly feedback and complaints mechanisms should be available to all children. These are key accountability measures that help strengthen program quality and monitor harm and abuse. Encourage their use. Ensure that children know these are safe and they will not be punished or retaliated against for using them – monitor to ensure that is the case. Additionally, establish grievance and redress procedures for children receiving HCTs. Inform children of actions taken in response to their feedback.

Monitoring of programs that involve children should include children. Children may be able to provide information on changes within their household, their experiences with negative coping and discrimination, and information connected to spending and basic needs.

- **Consult children in PDM**. Ensure those undertaking the monitoring are trained in child-friendly techniques, safeguarding, and on how to take informed consent or assent.
- **Ensure that all data collectors and PDM teams are trained on how to make referrals** for any risks reported to them or which they may encounter, including incidents requiring urgent action.
- Include relevant **child protection outcomes and indicators within monitoring frameworks**.
- **Enforce strong data protection measures, including anonymizing personal details.** Safely collect, store, process, and share data. Have strong information sharing protocols in place.

H. Best Practices on Risk Mitigation in providing cash for Child Protection

Risk	Mitigation Measures
Lack of understanding of potential safeguarding risks can lead to **risks not being appropriately identified and therefore mitigated.** This includes risks of all types of child abuse and harm to children i.e. emotional abuse, neglect, physical abuse, sexual abuse (including sexual exploitation), exploitation.	Ensure affected communities (both adult and children) are active participants in all relevant elements of the project. This means involving them throughout the situation and response analysis, program design, implementation, and monitoring phases. Their perceptions and feedback on the risks and barriers they face should inform all elements of program design and implementation.
Individuals or single organizations holding control over a wide range of decisions **increases opportunities for exploitation or maltreatment of beneficiaries** as no one else can hold them to account. **Exploitation of children, including sexual exploitation** (e.g. grooming, or pressure to provide sex-for-assistance) may arise from the unequal power dynamic between on the one hand children (who are particularly vulnerable) and / or families who may need cash or assistance and on the other hand, those who have the power to distribute these resources. This **risk could come from your organization's staff, delivery partners, or the local community** (especially if they are part of the distribution committee).	Ensure targeting and disbursement or distribution processes are not managed by a single individual, and responsibilities are shared and reviewed or signed-off by different individuals / teams i.e. there is a **segregation of duties**. Segregation of duties between teams and between organizations can both be used to reduce risks. Sharing responsibilities and duties between teams and between organizations increases accountability between staff members to ensure that procedures and codes of conduct are always adhered to. It's important that children, adults and staff members and volunteers know that there are several places to report concerns and incidents, especially as child safeguarding (CSG) concerns might be in relation to a particular staff member or team.
Unaccompanied or separated children may be at risk of being left out of CVA scheme or may bear the burden of multiple risk factors, particularly when placed with non-relational or extended-relation caregivers. Making sure UASCs have access to assistance may prevent some bad coping mechanisms which could lead to GBV.	Coordinate with the Child Protection sub-cluster to understand risks and mitigation measures for children especially UASCs. Consider variable transfer amounts for different household dynamics and couple cash assistance with strong CP case management, including services for UASC.

In requests for financial support, beneficiaries may have an attitude of dependence on the support and caseworkers who provide it. Beneficiaries may not understand that the support is short-term or one-time, or they may request more. In addition, there may be an attitude that the institution or caseworker should solve every child protection risk experienced.	The beneficiary should be informed in detail about the duration, amount and output of the support provided. The caseworker should not engage in any behaviour that would distort the professionalism of the relationship with the beneficiary. It should be ensured that any financial support is provided in line with the outputs of protection and in an approach to empowerment.
It is important to provide support for cases such as custody and guardianship, such as power of attorney, notary fee or document translations. Because in such cases, it is important to make sure that the process is started, especially if the unaccompanied or separated children are cared for by a caregiver, and the case should be followed up. However, giving the necessary fee to the beneficiaries in cash for the initiation of this process may cause this support to be used specifically for other needs, not to start the process or to delay it.	Instead of delivering the document translation and notary fees to the beneficiary in cash, it can be encouraged to pay directly to the notary public or the relevant institution. In addition, it is recommended to accompany the beneficiary in this process. Payments made by receiving a receipt or invoice in return for this type of payment will both ensure that the support is provided and contribute to the transparency of the institution.

The following examples are specific for children who are directly the recipients of cash and voucher assistance

If children are not able to use certain delivery mechanisms more indiscrete and less flexible delivery systems, such as large sums of physical cash in hand, may be used which could lead to increased risk of physical abuse and theft.

Children accessing the marketplace may expose them to safety risks such as physical dangers in the marketplace or on the journey (e.g. open sewers, or areas that were severely destructed/damaged due to the earthquake) or risks of being exploited (e.g. traders overcharging children). The risks are particularly high if children are on their own.

Children accessing distributions alone will be placed in vulnerable positions either because they are immediately vulnerable to theft or attacks or because they are marked out as different and so open to physical and emotional bullying. This is particularly an issue where it is clear to the community that only groups with specific vulnerabilities (e.g. UASC, child mothers, children with HIV) are targeted as beneficiaries as they are more likely to face stigmatisation.

Children may be at risk of exploitation if they are unfamiliar with how to manage a budget and the cost of goods and services.

Children may, more easily than adults, be bullied into not reporting SG issues they are facing leading to a continuance of the harm being caused them. In addition, they may find the complaint and feedback mechanisms (CFMs) too intimidating, difficult to access, or confusing, may not know that they even exist, or may not fully understand that what is being done to them is wrong.

Consider at least the following when conducting a **risk/benefit analysis:**

- If there are laws preventing children from accessing financial service providers (FSPs) or other forms of assistance e.g. there may be legal age restrictions on banking or mobile network operators (MNOs) distributing SIM cards to minors

- Whether there are discrete and flexible delivery mechanisms which can be used with children

- Children's situation, for example are they UASC, head of household, parents, etc., and whether their inclusion/exclusion from assistance exposes them to greater risks and vulnerabilities

- Children's ability to access physical markets and the risks they might be exposed to in doing so

- Whether children can safely store physical cash or cash equivalents

- Children's perception of risks and preferred method of assistance

Gather expert advice and source training from teams experienced with working directly with children (e.g. CSG focal points, child protection or education teams and clusters, experienced local community organisations).

Where there are concerns about children's capacity to manage funds and budget appropriately consider **splitting transfers** to children (or other vulnerable recipients) into bi-weekly, or weekly, instalments and advocating with Child Protection actors **to compliment CVA distributions with life skills courses** on financial management.

Note: *The advantages of splitting one large transfer into multiple, smaller transfers should be balanced against the risk of children frequently travelling to distribution / disbursement sites.*

Consider identifying community members or focal points that can **provide support to children** directly receiving CVA on food preparation, shopping and cooking where relevant.

Training on financial literacy, the delivery mechanism, and what constitutes child abuse or exploitation, and other project **communications should be done in a child-friendly manner** and delivered using materials that are accessible to children. Seek advice from colleagues who are experienced in working with children on how to adapt the training you are delivering to others.

Complaints and feedback mechanisms must be accessible to children.

A few suggestions for the provision of assistance:

The beneficiary should be informed about the aim of assistance being provided. This aims to address the planned and agreed-upon outcomes agreed in the case plan and target the beneficiary's unique protection concerns. The assistance is not registration-based; instead, it is individually identified protection intervention tailored to the beneficiary's specific protection needs.

The service provider should exercise caution to ensure that this assistance does not result in inequality within the community and does not harm the beneficiary. If the situation involves a formal tent and camp area, an assessment should also be conducted for other residents in the area. Additionally, other residents with protection concerns that can be alleviated through this assistance should also be supported, especially

if the beneficiary resides in a formal tent/camp area. In such cases, other residents might withdraw their social support, potentially impairing the beneficiary's support network due to perceived inequalities.

The method of providing assistance should not contradict the cultural norms and practices of both the beneficiary and the community. The assistance must never expose the beneficiary to additional risks or threats. It is imperative that the assistance strategy respects and upholds the beneficiary's honor, ensuring that no harm comes to their dignity.

İ. Key Resources

- Individual Protection Interventions Guidance, Final Draft, Protection Sector
- Inter-Agency Child Protection Case Management SOP Türkiye, Draft, Child Protection Sub Sector
- Child Protection Key Considerations for Humanitarian Cash Transfer Programmes, UNICEF
- Child Protection and Cash Based Interventions Tip Sheet, UNHCR
- Cash and Child Protection, How cash transfer programming can protect children from abuse, neglect, and violence, Save the Children
- Child Safeguarding for Cash and Voucher Assistance Guidance. Judith Amar, Hannah Hames, and Nik Klifton. 2019. Save the Children.
- Cash and Voucher Assistance and Child Protection in Humanitarian Action: Guidance Note on Cash and Voucher Assistance for Child-headed households (CHH) and Unaccompanied Children (UAC), The Alliance for Child Protection in Humanitarian Action.
- Designing cash and voucher assistance to achieve child protection outcomes in humanitarian settings, The Alliance for Child Protection in Humanitarian Action.
- Toolkit for Monitoring and Evaluating Child Protection when using Cash and Voucher Assistance. The Alliance for Child Protection in Humanitarian Action.
- Safer Cash Toolkit: Collecting and using data to make cash programs safer, August 2019, USAID and IRC.
- Child-Centred Multi-Risk Assessments: A field guide and toolkit, Plan International, July 2018.
- Protection Risks and Benefits Analysis Tool, Enhanced Response Capacity Project.

Annex-1 Financial Proxy/Custodian Agreement

Child's basic bio-data	
Case ID / Unique Case Code	

The agency (*name*) _____ has, after thorough assessment and consideration, identified (*name of proxy/custodian*) _____ residing at *(address of proxy/custodian)* _____ as a financial proxy/custodian for the above-mentioned child.

The proxy/custodian _____ will have the mandate of safeguarding (overseeing and supporting) the delivery of cash disbursement to the above-mentioned child.

The full cash amount is USD _____ (TRY _____) in (*number of installments*) _____ over a period of (*number of months or weeks*) _____ .

The proxy/custodian _____ will:

1. Provide advice in managing the money in the best interest of the child and/or the child headed household,

with the understanding that there will be no personal gain, financial or otherwise.[5]

2. Not abuse or exploit the child in any way.
3. Notify the agency (listed above) prior to any move to another location, including a change of residence in and outside the present location.
4. Cooperate with the agency, including attending monitoring visits or phone calls and participating in the overall monitoring process (PDMs).
5. Proactively engage and seek advice/assistance from the agency if there are any problems with the financial proxy/custodian arrangement, using the feedback mechanisms provided.

The agency _____ will:

1. Transfer the agreed cash/voucher amount and/or type of in-kind assistance
2. Have the right to terminate the proxy/custodian arrangement, if there is evidence or suspicion of exploitation, abuse, mistreatment or fraud.

This agreement reflects agreement from the child, the proxy/custodian and the agency and the endorsement of the community representatives.

Note, this is not a foster care or adoption agreement. This agreement is only related to cash transfer programming, of which the child is a beneficiary.

Signed:

Name of financial proxy/custodian	
Signature	
Date	

Name of community representative	
Signature	
Date	

Name of Agency Representative	
Signature	
Date	

Name of child beneficiary	
Signature	
Date	

This agreement is binding and effective from the date of signature.

[5] In case the provided assistance in different modalities is lost or misused, the assistance cannot be delivered again. Guardian is responsible to provide the proof that the assistance is actually utilized in the best interest of the child. Organizations are expected to follow-up the use of assistance with the guardian and child.