



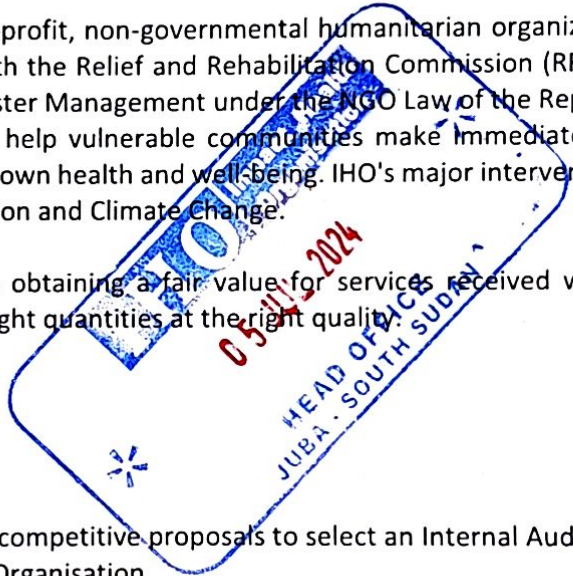
**REQUEST FOR PROPOSAL (RFP) FOR PROVISION INTERNAL AUDIT SERVICES**

**SPECIFICATIONS AND INSTRUCTIONS TO BIDDERS**

**A. Impact Health Organisation**

Impact Health organization is a national non-profit, non-governmental humanitarian organization established in 2013 and is fully registered with the Relief and Rehabilitation Commission (RRC) of the Ministry of Humanitarian Affairs and Disaster Management under the NGO Law of the Republic of South Sudan. IHO's primary mission is to help vulnerable communities make immediate and lasting changes to manage and maintain their own health and well-being. IHO's major interventions include Health, Nutrition, Wash, GBV/Protection and Climate Change.

Impact Health Organisation is committed to obtaining a fair value for services received with a competitive price and timely delivery of the right quantities at the right quality.



**B Administrative Information**

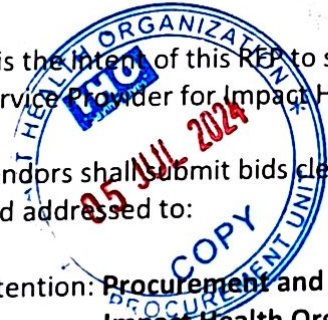
B1) It is the intent of this RFP to secure competitive proposals to select an Internal Audit Service Provider for Impact Health Organisation.

B2) Vendors shall submit bids clearly marked **RFQ JUB IHO2024IAP001** in the subject line and addressed to:

Attention: **Procurement and Logistics Manager**  
**Impact Health Organisation**  
**Bilpham Road, Next to Aida Hotel**  
**Juba, South Sudan**  
Email: [procure@ihosavinglives.org](mailto:procure@ihosavinglives.org) c.c [tender@ihosavinglives.org](mailto:tender@ihosavinglives.org)

B3) Bids must be received by **19th July 2024 at 16:00h CAT**. Bids submitted after the deadline will NOT be accepted.

B4) Impact Health Organisation shall notify the winning bidders in writing within fourteen (14) working days of the bid opening. Impact Health Organisation is under no responsibility to release the identity or contract terms of the winning vendor.



- B5) The submitted proposal shall include the following information. Failure to supply all requested information or comply with the specified formats will disqualify the bidder from consideration.
- i) Completed Bidder Response Document, including the following attachments
    - a. Signature to confirm compliance with Impact Health Organisations Policies (section 3)
    - b. List of NGO clients plus any recommendations (section 2)
    - c. Detailed list of services that meets or exceeds our criteria
  - ii) Copy of business registration documents (proof of legal operation in South Sudan).
  - iii) Pricing proposal based on the details provided in this RFP
- B6) Impact Health Organisation reserves the right to accept or reject any or all bids, and to accept the bid deemed to be in the best interest of Impact Health Organisation, and is not bound to accept the lowest priced bid submitted.
- B7) Impact Health Organisation reserves the right to award contracts to multiple vendors if deemed to be in its best interest.
- B8) The award criteria shall be based on the proposals overall response and “value for money” while taking into consideration donor and internal requirements and regulations. The award will be determined by a committee of Impact Health Organisation employees.
- B9) All bidders will be verified against the following sanctions lists:
  - UK Treasury List
  - EC List
  - OFAC List
  - Public Procurement and Disposal of Public Assets Authority
- B10) The successful vendor shall receive a contract for the period of the services required, which can be extended upon agreement of both parties.
- B11) The language for communications and required documents is English.

### C Technical Requirements & Specifications

The Internal Audit function is responsible for developing, directing, and coordinating a comprehensive internal audit program, which supports improvement of the risk management of Impact Health Organization South Sudan. Whilst risk management responsibility is that of the Country management, she/he is the main instrument for its implementation and improvement.

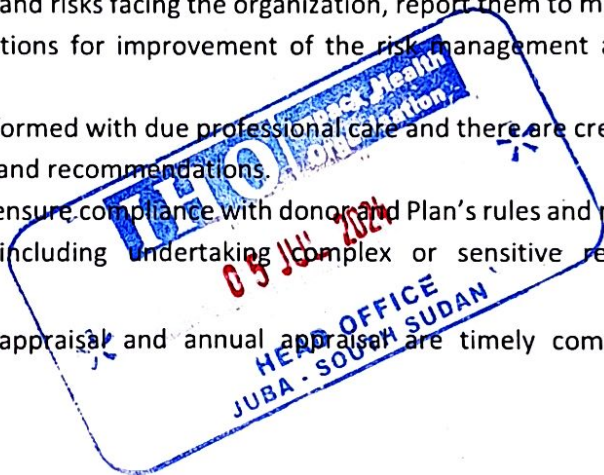
#### Dimensions of Role:

- Area of Responsibility – Countrywide.
- Located at Country level and reports to BOD.

- Programs and Finance systems, processes for compliance and management information.
- Risk Management and support for the proper functioning of all IHO systems.

**Typical Responsibilities – Key End Results of the Consultant:**

- Coordinate and monitor the Internal Audit function and programs.
- Participate in the design, implementation and monitoring of all the processes required in the audit work (annual plan, standard working papers, reporting format and protocols) etc.
- Strengthen the Risk Management processes in line with Impact Health Organization South Sudan requirements through facilitation of the country risk management plan of actions, update and monitoring of the country risk register.
- Review the current Internal Control Systems for its effectiveness and appropriateness to achieve the Organization’s objectives and report on areas of improvement.
- Monitor actions taken by management in response to audit reviews, ensuring that all agreed audit actions and recommendations are accurate and timely implemented.
- Work closely with external or visiting auditors and support their audit process.
- Analyze all success factors and risks facing the organization, report them to management and provide recommendations for improvement of the risk management and overall Internal Control system.
- Ensure that audits are performed with due professional care and there are credible audit observations, conclusions and recommendations.
- Perform Partner audits to ensure compliance with donor and Plan’s rules and regulations.
- Performs other duties, including undertaking complex or sensitive reviews and investigations as assigned.
- Ensure IAP, six months appraisal and annual appraisal are timely completed and documented.



**Providing Assurance:**

- Planning, monitoring and quality review of assurance engagements on key systems, processes, policies and controls carried out at the Country level.
- Develop a financial year (FY) work plan for the country/specific area of work, as agreed with the BOD that provides assurance on key systems, processes, policies and controls in Impact Health Organization South Sudan
- Prepare and monitor budget to implement the annual work plan.
- Review on-going assurance assignments on the work plan in line with International standards on internal auditing.
- Prepare reports to relevant stakeholders on audit engagement assignments undertaken.
- Monitor the process of management’s actions in response to audit/assurance reviews.



**Change Management, management support and learning:**

- Influence change within and across the Organization to strengthen risk management,

accountability, effectiveness, and support management in improving operations and to provide a platform for learning across Plan.

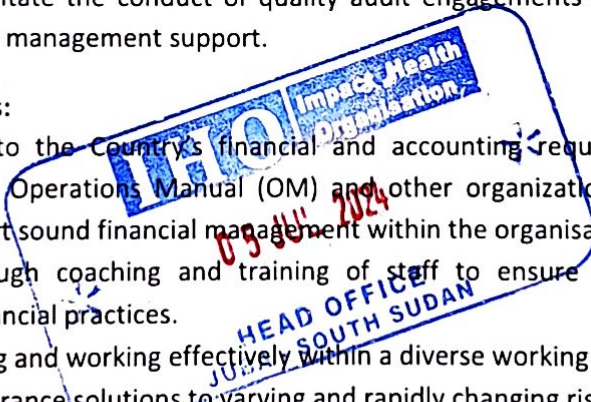
- Provide practical recommendation on how to improve systems, processes, policies and controls.
- Facilitates the sharing of learning, based on best practices or from different units within the Organization as well from best standards and practices from the industry.
- Provide technical support in network meetings and other Organizational trainings focusing on risk management and effectiveness of the control framework.
- Provides advice to Country Management Team (CMT) on systems, processes and policy reviews, in agreement with the Country Director.
- Actively participates in Regional and other leadership meetings to provide strategic input on risk management.
- Contributes to the induction of new CMT members upon request on risk management, effectiveness of the control framework and the role of internal audit.

#### Relationship Management

- Builds relationships with internal and external stakeholders to facilitate audit engagements and exchange of knowledge on audit best practices.
- Build relationship with key internal stakeholders mainly program unit and country management to facilitate the conduct of quality audit engagements and identify appropriate areas for management support.

#### Dealing with Problems:

- Ensures adherence to the Country's financial and accounting requirements as per requirements of the Operations Manual (OM) and other organizational policies and procedures to support sound financial management within the organisation.
- Offers support through coaching and training of staff to ensure improvement in performance and financial practices.
- Be creative in building and working effectively within a diverse working environment.
- Finding effective assurance solutions to varying and rapidly changing risk levels.
- Advising management on effective risk management and accountability.
- Making effective recommendations to management on how to improve the control framework and manage risks in various contexts and across different functions.
- Influencing management to implement recommendations made from assurance review
- Ability to manage competing priorities and expectations from internal and external stakeholders and remain calm and resilient in the face of pressure.
- Use Plan procedures to settle conflicts among colleagues.



- Refer, whenever necessary, any case to Country Director.

**Communications and Working Relationships:**

- Country Management Team (including Program/Project Managers)
- Maintains high contact with staff regarding Plan, policies and procedures

**Deliverables**

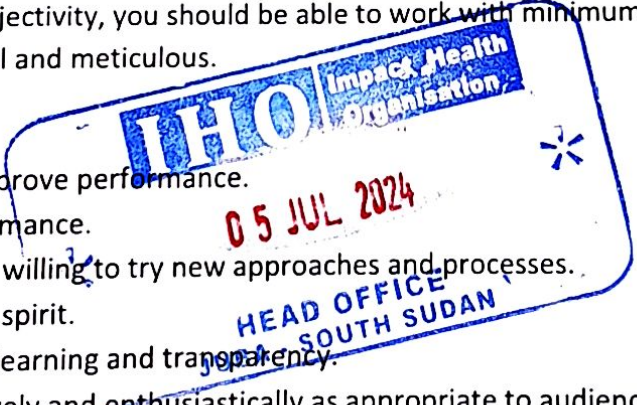
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**Knowledge, Skills, Behaviours, and Experience Required to Achieve Role’s Objectives: Qualification, Experience and Knowledge:**

- Membership of an internationally recognised institute of accountants or Auditors (e.g. CPA, ACCA, CIMA, IIA) or Master’s Degree in Auditing, Accounting/Finance, or related area.
- At least 5 years’ experience in a similar role.
- Provide evidence of similar work undertaken in the last 2 years.
- Recommendations from at least 3 clients for similar services.
- Demonstrate that she/he possesses the requisite knowledge, skills and competences needed to perform responsibilities expected in this assignment with due professionalism.
- Good analytical and synthesis skills.
- Ability to study and quickly understand new operating environment and organizational systems.
- Good communication skills (written and oral).
- Good listening and interviewing skills.
- Independence and objectivity, you should be able to work with minimum supervision
- Organized, methodical and meticulous.

**Attitudes:**

- Influencing staff to improve performance.
- Promoting high performance.
- Open to feedback and willing to try new approaches and processes.
- Having excellent team spirit.
- Promotes innovation, learning and transparency.
- Communicates effectively and enthusiastically as appropriate to audience.
- Behaves consistently in their approach to work and decision-making.



**Demonstrated behaviour’s needed by the post holder to successfully perform the role.**

- Communicates clearly and effectively.
- Ability to facilitate participative processes for all stakeholders for implementing grant projects.
- Strong team building skills, Organized and methodical.
- Independence, objectivity and integrity.



**Skills Specific to the post needed to put knowledge into practice:**

- Good supervisory & coordination skills and ability to deliver to tight deadlines.
- Fair knowledge of project planning, management, supervision, monitoring and evaluation tools.
- Excellent and demonstrable experience in grant and financial management.
- Highly developed interpersonal and communication skills including good listening skills, influencing, negotiation and coaching.
- Capacity to build and maintain relationships and to work effectively in a multi-cultural and multi-ethnic environment respecting diversity.
- Experience with Microsoft Word, Excel, Power Point and Outlook.



### Impact Health Organisation Terms and Conditions of Purchase

1. The bid documents and subsequent correspondences constitute part of this contract
2. The vendor shall keep all proprietary information accessed confidential and will not use this contract or any other related items such as the logo of Impact Health Organisation for any other business without the prior approval of Impact Health Organisation.
3. It is agreed that at minimum a quarterly review meeting will be held between senior representation of both Impact Health Organisation and the vendor to review performance of this contract. Each parties agrees to cover the cost of the meetings independently.
4. The vendor agrees to produce a statistical report to Impact Health Organisation at the end of every month.

#### **Payment and Fess Condition:**

5. The vendor agrees to honor the pricing terms presented in the RFP response for the period of the resulting contract
6. All payments will be made in the agreed currency in accordance with the agreed payment terms with the following supporting documents;
  - a. The purchase order confirming the supply of goods/services from an authorized Impact Health Organisation staff member as set out in the contract showing the price.
  - b. A signed proof of delivery of the goods/services ordered by the Impact Health Organisation.
7. The vendor provider will give a proper and immediate update on any promotional fares when introduced for the goods/services and also facilitate Impact Health Organisation to benefit from it.

#### **Force Majeure**

8. If the performance of the resulting contract is delayed, hindered or prevented or is otherwise frustrated by reason of force majeure which will mean any event beyond the control of the party affected including inter alia, Acts of God, Acts of regulation or Laws of Government or similar authority, war, civil commotion, destruction of facilities or materials by fire, earthquake or storm, labor disturbances, epidemics, failure of public utilities, then the party so affected will immediately notify the other in writing.
9. Upon acceptance in writing by the other party of the existence of any such event, or if the other party has failed to respond within 5 working days, the obligations of both parties will cease or shall be suspended for an appropriate period of time to be arranged between the vendor and Impact Health Organisation.

#### **Cessation and Suspension of Obligations**

10. In the event of the cessation of obligations Impact Health Organisation is obliged to pay any sum due or outstanding based on the number of goods/services to have already been issued/completed under the terms of this contract at the date of cessation;
11. Each party has the right to terminate this contract within 30 (thirty) days prior written notice in the event that;
  - a. the vendor does not remedy a failure in the performance of their obligations under this contract within thirty (30) days after being notified in writing or within such further period as Impact Health Organisation may subsequently approve in writing; or
  - b. the vendor become insolvent; or
  - c. as a result of Force Majeure, the vendor is unable to perform a material portion of the Services for a period of not less than thirty (30) days; or.
  - d. If donor terminates, significantly alters or suspends its contract with Impact Health Organisation, which will trigger a significant reduction in activities or programme closure.

#### **Arbitration**

Impact Health Organisation



12. Should the parties be in dispute on the meaning or interpretation of any of the terms of this Agreement, including a failure to agree on an event of force majeure, the matter will be referred to an arbitrator to be nominated by the parties or, failing contract, to be appointed in accordance with the United Kingdom Arbitration Act, and the decision of the arbitrator or ruling of the Court will be final and binding on both parties.

**Governing Law**

13. This contract will be governed by and construed in accordance with the Laws of South Sudan.





## Anti-Bribery Policy

### 1. Purpose and context

Impact Health Organisation's policy is to conduct its work in an honest and ethical manner. Impact Health Organisation, wherever it operates, takes a zero-tolerance approach to bribery and is committed to ensuring that its employees act professionally, fairly and with integrity in all dealings wherever Impact Health Organisation operates. This is to ensure that the organisation benefits from a valued reputation, and donor and partner and beneficiary confidence.

### 2. Principles

Impact Health Organisation is committed to implementing and enforcing effective systems to counter bribery.

### 3. Scope

This policy applies to all individuals in the organisation, including trustees, senior managers, employees (whether permanent, fixed term or temporary), volunteers and interns, consultants, partners and any other person or organisation providing services to Impact Health Organisation whether paid or unpaid.

All employees will be trained on this policy on joining the organisation as part of their finance induction. They will be asked to sign that have read, understood and agree to abide by its content. All other persons associated with the organisation will be informed of this policy through their contractual arrangements. For existing employees and associated persons the policy is to be communicated via the Country Director, the Regional Programmes Director in the regions and the Financial Controller in each country.

### 4. Definition and terms

#### What is a bribe?

A bribe is a financial or other advantage offered or given:

- To anyone to persuade them to or reward them for performing their duties improperly or;
- To any public official with the intention of influencing the official performance of their duties. This includes any form of gift or payment to an official in an attempt to speed up or complete a process quicker than usual. The size of the gift is irrelevant.

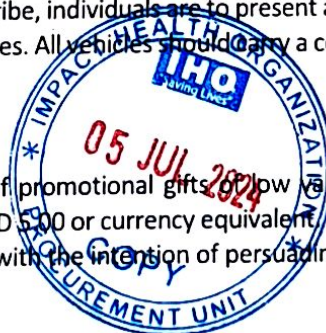
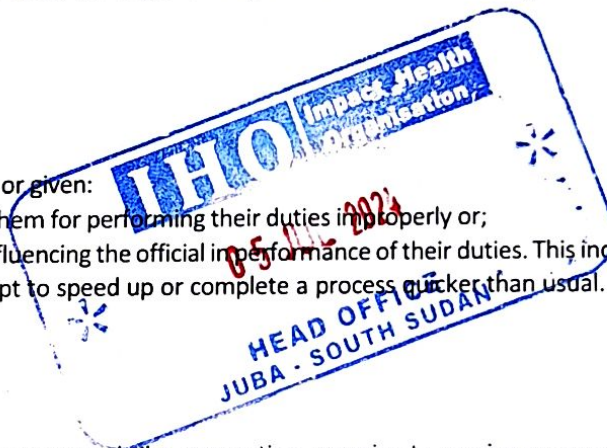
### 5. Implementation

Any individual suspected of offering, promising or giving a bribe, requesting, agreeing to receive or accepting a bribe or bribing a public official will be investigated under the organisation's disciplinary policy and if found guilty will be dismissed for gross misconduct. For any contractor found to offer, promise or give a bribe or requested or agreed to receive or accept a bribe or bribing a foreign public official, will have their contract terminated immediately, all business dealings will cease and financial compensation will be sought and it will be reported to the authorities as required by the Act.

If any individual is confronted with a request to make a bribe, individuals are to present a copy or explain this Anti-Bribery Policy and must not agree to the bribe in any circumstances. All vehicles should carry a copy of the policy for this purpose.

#### **Gifts and hospitality**

This policy does not prohibit the giving and receiving of promotional gifts of low value and normal and appropriate hospitality. Low value gifts are defined as those below USD 500 or currency equivalent. Gifts and hospitality may amount to bribery; therefore these must not be offered or given with the intention of persuading anyone to act improperly or to



influence a public official in the performance of his duties. Any gifts or hospitality offered must be reported to the Country Finance Manager before acceptance and instruction given to the individual on whether or not the gift is to be accepted.

Any offer or promise must be documented, whether it is approved or not by the Finance Manager on the register of interest and gifts for the country. Impact Health Organisation does not give out gifts, although within projects, some activities, such as low cost incentives to voluntary workers, may be acceptable. These must be within the original project and its budget as agreed with the donor.

The register will be accessible by the Country Director, internal and external auditors and to regional and HQ staff performing checks on visits to the country.

### Facilitation payments and kickbacks

Impact Health Organisation does not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official, for example to clear goods or persons through customs. Kickbacks are typically payments made in return for a business favour or advantage, for example, to reduce delivery time on goods and services. All employees must avoid any activity that may lead to, or suggest, that a facilitation payment or kickback will be made or accepted on behalf of Impact Health Organisation.

### Donations

Impact Health Organisation does not make contributions of any kind to political parties.

### Financial Systems

Impact Health Organisation will keep financial records and ensure appropriate internal controls are in place to ensure there is an evidence trail for any payments made to third parties, in order to prevent corrupt payments taking place.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with the financial procedures and must specifically record the reason for the expenditure.

All accounts, invoices, memoranda and any other documents and records relating to dealings with third parties, such as clients, suppliers and other business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal any payments.

### Whistle Blowing

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage in accordance with Impact Health Organisation’s Whistle Blowing Policy. Impact Health Organisation will apply criminal and administrative sanctions in a robust manner to demonstrate a zero tolerance to bribery.

### Monitoring

The effectiveness of this policy will be regularly reviewed by the Board of Trustees and internal control systems and procedures will be subject to audit under the internal audit



## Anti-Fraud and Anti-Corruption Policy

### 1. Purpose and context

The aim of Impact Health Organisation's fraud and anti-corruption policy is to minimise fraud through a series of measures, including clear policies and processes, regular internal and external audits and training for all staff.

### 2. Principles

Impact Health Organisation is committed to investigate any and all suspected acts of fraud, misappropriation or other similar irregularity. Detecting fraud and corruption is everyone's responsibility and if any incident or potential incident is discovered staff must report it immediately, as required by Impact Health Organisation's whistle blowing policy.

### 3. Scope

Impact Health Organisation is committed to maintaining an untainted reputation with its donors, partners, beneficiaries and vendors. All Impact Health Organisation employees and service providers are under obligation to maintain integrity in all actions and must avoid circumstances that compromise their decisions or actions. All employees must ensure that the ethical business practices and interests of the organisation are observed.

It is a major violation of Impact Health Organisation's policies for employees or service providers to knowingly conceal, falsify or misrepresent a material fact relating to any transaction. Misrepresentation may include but is not limited to: signing for receipt of goods or services not yet received or completed, or altering any document to disguise or change the outcome, including the back-dating of documents. For employees proven violations will lead to disciplinary action up to dismissal from employment and legal action. For service providers proven violations will result in the immediate termination of their contract and the cessation of all business dealings.

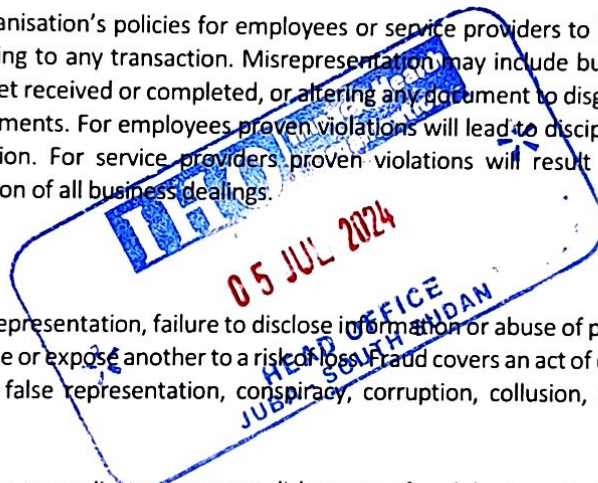
### 4. Definition and terms

Fraud is defined in the Uganda Act, as false representation, failure to disclose information or abuse of position, in order to make a gain for yourself or another or to cause or expose another to a risk of loss. Fraud covers an act of deception, bribery, forgery, extortion, theft, misappropriation, false representation, conspiracy, corruption, collusion, embezzlement, or concealment of material facts.

Anti-corruption: relates to the measures taken to eradicate or prevent dishonest or fraudulent conduct.

Both corruption and fraud amount to abuse and theft. Acts of fraud and corruption include, but are not restricted to:

- Falsifying time sheets or payroll records
- Falsifying travel and entertainment expenses
- Fictitious reporting of receipts from suppliers or shipments to customers
- Creation of false invoices or purchase orders, including the back-dating of documents
- Misappropriation of Impact Health Organisation and donor equipment, resources and even data
- Misstatement of income
- Misstatement of assets
- Understatement of liabilities
- Paying bribes, that is payment to another person to induce a certain action from them, this includes payments to officials such police officers requesting unofficial payments on road blocks
- Receiving money or gifts in order to undertake a certain action for example ordering with a specific supplier



- Obtaining Impact Health Organisation income or assets by deception
- Claiming to provide services to beneficiaries that do not exist, and other forms of identify fraud

## 5. Implementation

### Steps to mitigate occurrence

The organisation adopts the following anti-fraud measures to minimise its risk from fraudulent activity:

- Clear policies on the expected conduct of staff in the organisation, for example Anti-Bribery and Code of Conduct communicated as part of induction programme and updates staff in team meetings.
- Records and investigates all incidences including suspected and confirmed fraud, in line with MC Guidance on Conducting a Fraud investigation.
- Reports fraud to the police and to the Charity Commission.
- Implements robust controls and informs staff about the procedures and measures in place.
- Ensures records of all income and expenditure are kept and receipts, invoices and supporting documents are adequate.
- Checks that financial controls are not overridden, by-passed or ignored
- Reconciles bank accounts monthly and conducts spot checks
- Uses tiered delegated authority and signature levels for all payments
- Restricts and closely monitors access to sensitive information
- Implements an Internal Audit function reviewing processes and procedures on a risk basis
- Establishes clearly defined roles for staff that include segregation of duties

Impact Health Organisation has a zero tolerance to fraud and corruption. Impact Health Organisation will apply robust sanctions to combat fraud and corruption including disciplinary action and reporting suspected criminal activity to the police.



## Child Safeguarding Policy

### STATEMENT OF COMMITMENT

Impact Health Organisation is committed to comply with all relevant local law on child rights and welfare in order to provide what is in 'best interest of the child' including employment law that apply to children.

Impact Health Organisation is committed to the welfare and rights of children. All staff, volunteers, interns, consultants, visitors, donors, service providers, trustees or sponsors of Impact Health Organisation are expected to treat all children and other staff with respect and dignity regardless of race, colour, sex, language, religion or belief, political or other opinion, ethnic or social origin, disability, birth or other status. This includes all children less than 18 years of age.

Inappropriate, harassing, abusive, sexually provocative or demeaning language or behaviour towards children will not be tolerated. Different forms of child abuse include:

- **Physical Abuse:** Any punishments and physical abuse to children like beating including with a stick or other implement, poisoning, shaking and smothering or forcing the child to work in an unsafe way/environment. These are things that deliberately and negatively affect the physical well-being of children.
- **Mental Abuse:** Any actions (gestures, words and behaviour) that deliberately affect a child's mental/emotional well-being for example by making them afraid, anxious, annoyed or discouraged.
- **Neglect:** Any actions that deliberately neglect to provide the four essential rights of children (right to live, right to learn, right to participate and the right to speak).
- **Sexual Abuse:** Any actions with sexual intent towards children such as touching children's genitals, forcing child to watch or take part in pornography or coercing the child to have sex.

Impact Health Organisation is committed to informing children, decision makers, and the public through the media that child abuse is wrong. It is also understood that keeping silent is also wrong.

Where possible children are also included as key stakeholders because Impact Health Organisation believes that children have the right to speak and be heard. Involving them in the process also enables them to know their right to protection. Children are encouraged to have active cooperation, share information and be involved in advocacy initiatives.

All staff, visitors, partners and service providers agree to this policy which is reviewed every two years.

### BEHAVIOURAL PROTOCOLS

- Whenever possible, it should be ensured that another adult is present when working in the proximity of children. Sleeping close to unsupervised children will not be allowed unless absolutely necessary.
- That a child will not be engaged in any form of sexual activities or acts. Adults will always be responsible for their behaviour and cannot blame the child even if the child 'provokes' or acts in a 'seductive' way.
- That computers, mobile phones, video and digital cameras will be used appropriately, and never to exploit or harass children or to access child pornography through any medium.
- If protocols are broken the person involved will be disciplined and such disciplinary action could result in summary dismissal.



- Communities and children with whom Impact Health Organisation staff work will be informed of the protocols and will be assured that project support will not be discontinued if they report suspicious behaviour. Also Staff will not be asked to leave for reporting suspicious behaviour.
- Where children are placed in communities, there will be careful screening and training of foster parents to ensure safe and adequate care will be given.
- Impact Health Organisation, its partners and service providers will not hire children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.

## RESPONSES TO ALLEGATIONS

Individuals must immediately report concerns or allegations of child abuse. Where an allegation has been made that a staff member/visitor/service provider to the organisation has abused a child then the Impact Health Organisation will investigate and take the appropriate action to deal with the situation.

- Impact Health Organisation will have a designated person who is to be responsible for dealing with child safeguarding issues in the organisation.
- Both victim (and perpetrator) will be treated with respect from the start of the process to the end.
- Children rarely lie in situations like this so their story must be heard and believed unless proven otherwise. They may also require extra protection if the perpetrator has not been arrested.
- Impact Health Organisation will have a reporting procedure where the Country Director is informed and then others as the need arise.
- Records should be made of all facts related to the investigation and these should be carefully and confidentially filed.
- The relevant Embassy should be informed if a foreigner is involved.
- There should be a person designated to deal with the police.

## USE OF CHILDREN'S IMAGES AND PERSONAL INFORMATION FOR PROMOTION, FUNDRAISING AND DEVELOPMENT EDUCATION

When photographing or filming a child for work related purposes, Impact Health Organisation must:

- Before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
- Before photographing or filming a child, obtain consent from the child or a parent or guardian of the child. This must be explained to the child how the photograph or film will be used:
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels do not reveal identifying information about a child when sending images electronically.

