

Një projekt i Agjencisë Zvicerane për
Zhvillim dhe Bashkëpunim SDC



Schweizerische Eidgenossenschaft
Confédération suisse
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Agjencia Zvicerane për Zhvillim
dhe Bashkëpunim SDC

Zbatuar nga:



Save the Children



Tirana 26 / 06 / 2020

TERMS OF REFERENCE

(TOR) 2020-025

Assignment Title: Consultancy for Conception and Quality Assurance of the ICT tools for the needs of the project “Shkollat për Shëndetin” (“Schools for Health”)

As of March 1, 2020, Save the Children has started the implementation of a Swiss Agency for Development and Cooperation (SDC) project: “Shkollat për Shëndetin” (“Schools for Health”) in Albania.

Background Information on Save the Children

Save the Children is an independent child rights organisation working globally. Save the Children's Office in Albania runs a long-term development programme and has established a high profile and sound reputation in child rights issues, particularly in the following thematic priority areas: Education, Child Protection, Child Rights Governance and Health.

Save the Children in Albania focuses its work on capacity building and strengthening of services for children and the creation of a policy and legislative environment which responds to key child rights issues in the country. To achieve our tasks, we primarily work with and through partners like non-governmental organizations (local and international), UN and the Government. This ensures that the rights of the greatest number of children are met in the best possible way. We constantly monitor and evaluate all projects to ensure quality in our work.

Save the Children is establishing and strengthening structures and mechanisms which monitor and advocate for children's rights, promote ways to protect children from all forms of exploitation and violence and also empower and support children to meaningfully increase their participation in school life and beyond and be advocate of their rights and influence decisions that bring about changes in their future lives.

Background of the project

The overarching goal of the project is to reduce the exposure to the major risk factors for Non-Communicable Diseases (NCD) in the Albanian population in general, but with a particular focus

on schoolchildren. The project will promote positive behavioural changes among all primary schoolchildren in Albania in order for them, their respective families and communities at large to engage in healthy lifestyle practices including healthy nutritional practices, physical activity, and no use of smoking, alcohol consumption or drugs, as well as promotion of other healthy behaviours/lifestyles. This 9-year project consists of the Inception Phase (12 months), the Main Phase (4 years), and a Follow-up Phase (4 years).

For the Inception Phase, the main goal is to develop a structured and clear-cut implementation approach that will guide the intervention of the main phase with regard to achieving the ultimate goal of the project: that is to reduce the exposure to the major risk factors for Non-Communicable Diseases (NCD) among Albanian children and their families, thereby promoting healthy behaviours in the overall population. The project covers all schools in the 9-year system in Albania.

Key stakeholders and project components relevant to this consultancy:

To strengthen national, regional and local capacities and all the existing structures, while enabling a multi-sectoral approach and inter-institutional collaboration, the project will make sure to follow a fit for purpose structure and undertake some necessary measures. The proposed project will coordinate with all relevant central and local level institutions and will be fully in line with the emphasized priorities of the Albanian government to achieve universal health coverage and improve the health status of the overall population.

Below we introduce institutions and other actors, which we understand to be key for this project:

-Institutional level: Ministry of Health and Social Protection; Ministry of Education, Sport and Youth; Ministry of Agriculture and Rural Development and their subordinate institutions; Local government (Municipalities).

-Civil society: The preferred NGOs will be those with long experience in the area of child education, child health, as well as women associations and Roma/Egyptian NGOs, and other NGOs with experience in working with vulnerable/marginalized population groups. In addition, Parent Teacher Associations and other support structures and relevant organizations will be involved.

-Private sector: collaboration with private companies and a wide range of providers in the field of IT, health market and other sectors will be sought whenever relevant and efficient for the project.

-WHO: this project will be implemented jointly with the WHO Office Albania.

-International donors and agencies: complementarities and synergies will be sought with others projects funded by SDC and other donors and funding agencies.

Project components most relevant to this consultancy:

During the inception phase, the project will work amongst others on two components:

1. Preparatory work for main phase:

- 1.1 Conduct assessments (fine-tuning targets, geographic targeting, multi-sector coordination) that would need development of TORs, protocols for data collection, clearance from Ethics Commission

- 1.2 Disaggregate needed information and conduct primary data collection if needed;

- 1.3 Development of instruments for mapping of all schools in terms infrastructure, human resources and equipment suitable for an NCD prevention program together with online tool application suitable for mobile data collection
2. Establishing the Project's Monitoring, Evaluation, Accountability and Learning (MEAL) system through a project execution plan, which will include elements of:
 - 2.1 Information sharing to beneficiaries, stakeholders and donor;
 - 2.2 Tracking of information in real time manner, measuring progress against baselines and target values,
 - 2.3 Ensuring quality, transparent and reliable data
 - 2.4 Ensuring accountability mechanisms to take feedback and complaints from beneficiaries and refer them to appropriate public institutions
 - 2.5 Documenting good models for scale up and handover to government actors

General purpose of the service tendered

Save the Children is looking for a consultancy company to conceptualize the ICT tools and to provide Quality Assurance during their implementation making sure that these tools meet the needs of the project "Health Promotion and Non-Communicable Disease Prevention in Schools". The consultancy firm selected will develop the conceptualization of ICT Tools needed for this project as specified below and will provide Quality Assurance in collaboration with the Project Team, and will closely interact with and receive input from technical experts who will develop and implement the tools, ensuring their timely inputs and delivery of tasks. The consultancy firm selected will need to ensure taking advantage of using technology approaches in reaching community members at national level, as well building upon already established network of schools in the 9-year system from Save the Children's team in Albania in the framework of their education programme.

General description of the objectives of the Digital Tools to be developed

The project "*Shkollat për Shëndetin*" ("*Schools for Health*") aims to employ several digital (online) tools eventually supported by the same platform which needs to be developed in the Main Phase of the project, with the following objectives:

- To ensure a wide reach and eventually national coverage, at least for the baseline assessment of all schools, which is very important for informing decision-making and prioritization of main phase activities;
- To ensure timely and effective information exchange with beneficiaries, schools, and all relevant stakeholders at national and local level;
- To administer different types of surveys and apply a wide range of data collection instruments;
- To ensure direct participation and contribution of beneficiaries, schools and all institutions involved in project activities;
- To enable prompt feedback and valuable insights from all concerned parties and project beneficiaries;
- To monitor the timely and effective implementation of project activities.

- The expected benefits of employment of digital tools are not intended to pose additional burden or exert control over schools or other institutions.

The specific 6 digital tools required are listed under the deliverables below.

Principles and prerequisites

- The IT company should make sure that all tools that require hosting will be deployed at AKSHI (National Albanian Internet Society), which will ensure compliance with current national developments and also sustainability of use and application beyond the scope and timeline of the Project. In all cases, this issue should be agreed by the Project Team with the Government of Albania (GoA) and, eventually, all the relevant national institutions can use this as part of national policies and related instruments.
- The planning, design and development of all digital tools will be done in collaboration with national/local counterparts. The involvement of national/local stakeholders in the planning and design will strengthen their capabilities to manage the tools and, upon project closure, the ownership of the tools will be transferred to them.
- The most important contribution of digital tools is its potential reach. Whereas traditional methods of supervision, training, teaching, distribution of information materials, etc. have their limitations related to cost of preparation, logistics of distribution and delivery, costs of attendance (in case of training), etc., the digital tools overcome this limitation.
- Considering that several digital tools may have been already developed in Albania, the company should initially compile an inventory of all existing digital tools and a detailed assessment of their capabilities and usage will take place. Subsequently, the Project may:
 - support some of the current tools in use;
 - propose enhancements and content creation for some of the existing tools, or;
 - propose replacement and establishment of new tools that are more robust, more user-friendly, and more cost-effective.

Timeline

Indicative assignment dates: July 2020 – October 2020.

A possible timeline on the service implementation can be as per the following Gantt chart:

No.	June-October 2020			
	June-July	August	September	October
1.	Preparation of TORs for six Digital Tools			
2.		Supervision and Follow-up on digital tools creation		
3.		Technical Evaluation		
4.				Product Certification

DELIVERABLES

The main outcomes of the consultancy company will consist of the following:

1. Preparation of TORs for six deliverables:

- GIS: geographic information system (for mapping and digitalization of all 9-year schools in Albania).
- BAS: online application tool for administration of the “Baseline Assessment of Schools” (BAS), which will be needed for a nationwide appraisal of all primary schools in Albania.
- SHI: online application tool for administration of the “School Health Index” (SHI), which will be needed for an annual nationwide assessment of all primary schools in Albania.
- Online collaboration tool for stakeholders.
- Information sharing channels between stakeholders.
- Social digital marketing survey.

2. Plan for Monitoring, Evaluation, Accountability and Learning (MEAL)

Conceptualization and Quality Assurance of tools for a vital Monitoring, Evaluation, Accountability and Learning (MEAL) system:

- Conceptualization and Quality Assurance of the project website

The project website will be an important tool for info sharing of project activities starting from the inception phase of the project. In addition, a social media engagement platform will be developed, addressing different inquiries from the parents, teachers, doctors, or other staff and providing online responses to their needs – as part of parent and wider public education.

- Conceptualization and Quality Assurance of a digital knowledge base portal

A digital knowledge base portal will also be developed and updated throughout main Phase consisting of a resource pool where teachers, parents and doctors may get support documents, videos, flyers, promotional materials to support the delivery of NCD content to children.

- Conceptualization and Quality Assurance of an E-learning platform

E-learning platform online education platform of distance learning that delivers content (video, presentations, handouts, resource materials) either in synchronous (webinar style) or asynchronous (store and forward) mode, that enables course authoring and delivery, monitoring of attendance, generation of evidence of attendance as well as evaluation of pre/post course knowledge.

- Conceptualization and Quality Assurance of Mobile Apps

Mobile Apps for parents, teachers and doctors will be developed in order to enable an effective delivery of education content as well as communication with beneficiaries, especially for targeting vulnerable children (app for communicating with parents of children with diabetes and/or obesity; app for communicating with parents of children with special needs).

3. Supervision and follow-up Report on digital tool creation

4. Technical Evaluation Report

5. Product certification

Important aspects to consider for the development of the ToR and quality assurance of the above listed tools:

1. Conceptualization and Quality Assurance of an online collaboration tool

The consultancy company will be responsible for conceptualization of an online collaboration tool, which will enable all stakeholders, being national, international, beneficiaries, etc. to participate and contribute to the activities of the Inception Phase. Various forums will be setup and supported with the idea of gathering valuable insights and feedbacks from all concerned parties, as well as to establish ownership.

2. Conceptualization and Quality Assurance of support data collection and analysis

The consultancy company will be responsible for conceptualization of a mobile-optimized interface that will enable the data collection teams to use mobile and tablets to collect data, upload them securely in the survey server and analyses them.

A survey form with multiple sections (tabs) will be designed as a Mobile Data Collection (MDC) Tool that can be completed in computer, tablet or smart phone.

3. Conceptualization and Quality Assurance for Social digital marketing survey

The consultancy company will be responsible for conceptualization and quality assurance of the digital marketing assessment. The scope of the digital marketing assessment will be to determine key words, search patterns, etc. that are used by young people and parents when accessing internet for the purpose of obtaining information related to NCD and NCD prevention. The digital marketing assessment will strongly rely on Google and social media analytics and will inform the design of the subsequent phase of the project.

ASSESSMENT

The tenders will be evaluated based on the technical proposal (40 points), key staff available (20 points) and financial proposal (40 points), with a maximum of 100 points.

Exclusion criteria

Tenderers shall be excluded from participating in the tender procedure if they:

1. Have been sentenced by final judgment on one or more of the following charges: participation in a criminal organisation, corruption, fraud, money laundering;
2. Are in a situation of bankruptcy, liquidation, termination of activity, insolvency or arrangement with creditors or any like situation arising from a procedure of the same kind, or are subject to a procedure of the same kind;
3. Have received a judgment with res judicata force, finding an offence that affects their professional integrity or serious professional misconduct;
4. Do not comply with their obligations as regards payment of social security contributions, taxes and dues, according to the statutory provisions of their country of incorporation, establishment or residence.

Save the Children reserves the right to ask tenderers, at a later stage, to supply the following supporting documents:

- An extract from the record of convictions or failing that or equivalent document issued by the competent judicial or administrative authority of the country of incorporation, indicating that the first three requirements listed above under “exclusion criteria” are met.
- A certificate issued by the competent authority of the country of incorporation indicating that the fourth requirement is met.

Eligibility criteria

Tenderers shall demonstrate that they fulfil the following criteria:

- Be legally registered company
- Must have a yearly turnover of the last two financial years above EUR 250.000; this criterion applies to the tenderer as a whole, i.e. the combined capacity of all members of a group in case of a joint tender.
- Must have a distinct profile in consultancy, proving a successful experience working for international development programs in Albania in the last five years.
- Prove human resources organizational capacity, having at least eight employees.

Award Criteria for Technical proposal (40 points in total):

1. Technical proposal / plan of activities and milestones. – 8 points
2. Minimum required: Capable and experienced management carrying out scopes of work of similar size and complexity in projects financed by international donors (to be proved with at least five similar contracts, in the last five years). – 5 points
3. Minimum required: Proven experience with implementation of at least one national database, other digital tools, or other type of work with AKSHI, in the last five years. – 4 points
4. Experience working for development partner programs in low- and-middle income countries will be considered an advantage. – 4 points
5. Previous experience working preferably with online systems or different types of digital tools in health and pre-university education level in Albania and/or other low- and-middle income countries, in the last five years will be an advantage. – 3 points
6. Previous experience in the design and/or implementation of Software Systems supporting vulnerable groups of children in Albania or similar settings, in the last five years will be an advantage. –1 point
7. Previous Experience in designing and/or implementing Software Systems for public central institutions in Albania and/or other low- and-middle income countries, in the last five years will be an advantage. – 3 points
8. Previous Experience in designing and/or implementing Software Systems for local institutions in Albania or similar settings will be an advantage. – 3 points
9. Having references for successful implementation of similar projects funded by

- international donors in the last five years; will be considered an advantage. – 3 points
10. Previous experience in managing teams of consultants/experts in similar projects, proved with expert's contracts, will be considered an advantage. – 4 points
11. Standard Quality Management System, proved with ISO 9001/2015 or later certification. – 1 point
12. Standard Information Security System, proved with ISO 27001/2013 or later certification. – 1 point

Award Criteria for List of Key Professional Positions whose CV and experience would be evaluated (20 points):

The Consulting Company will provide a team of unique experts with extensive experience in designing and implementing Software Systems to satisfactory and timely deliver the expected outputs.

The members of the team of experts should be full-time employees of the Consulting Company, at least for one month, with the profiles listed below:

Position	Key qualification	Experience	Evaluation Points: 20
Team Leader/Project manager	Degree in Informatics, Public Health, or similar fields. After graduation, studies such as Master in Informatics, Public Health, or related fields will be an advantage.	Minimum 10 years of working experience as IT solution architect. Experience in designing and implementing software systems. Proven experience with government projects on digital tools and online systems.	8 points
Business analyst	Degree in Informatics or similar fields. Software Development Certifications are an advantage.	At last 10 years of experience on the field. Experience in information system. Experience in analytical processes involving elicitation of requirements in complex business scenarios. Proven skills on data presentation, concept	4 points

	PHD in Informatics or related fields is an advantage.	and knowledge presentation. (PhD)	
Data Analyst	Degree in Informatics or similar fields. Holding full path certification for database systems such as MCDBA, MCSE, OCP or equivalent	At last 10 years of experience in data analysing and training end-users. Extensive knowledge on design, implementing and managing databases.	4 points
Web Technologies Experts(4)	Degree in Informatics or similar fields.	Experience in designing, developing and implementing web systems.	4 points

The following team members shall be contracted* on a fee-based contract for the services:

Position	Key qualification	Experience
Pre-university education levels expert	Degree in Educational Sciences. Master of Sciences diploma in Educational Sciences, or related fields.	Expertise in pre-university education levels in national level.
Child Protection and Social Care expert	Degree in Social Science; (Psychology, Social Work or similar fields). Proven Extensive Experience with vulnerable groups are an advantage. PHD in Social Science is an advantage.	Management expertise to foster technical and programmatic developments Multidisciplinary services for children in street situation and children with learning disabilities Psychosocial evaluations Expertise in research methodology implementation Expertise in child protection

*These additional consultants should be contracted by the company and should be included in the financial proposal.

Financial Proposal evaluation (40 points):

1. Breakdown costs into clear activities and components with units and quantities specified (20 points).
2. Value of the service is appropriate for the completion of the Terms of Reference (20 points).

• **Evaluation of the offers**

All the qualifying offers will be evaluated by an (internal) evaluation committee based on the following criteria:

Item	Description	Points
Technical proposal	Adequacy of the profile of the organization; Capacity to meet the prescribed deadlines; Capacity to interact with other systems and scope for the future development	40
CV of the applicant	Adequacy of the CVs of proposed staff	20
Financial proposal	Level of consultancy fees <u>will be accepted in ALL with all taxes included.</u>	40

• **Submission of application**

1. Item	Description
1	* <u>Cover letter</u> with original signature (including address, website, focal person if additional info is required)
2	* <u>Business Licenses – Registration Papers, Tax Payment Certification, etc.</u> <u>Balance sheet for the last 2 years</u>
3	The Supplier must have procedures and rules in order to guarantee the quality of project management and confidential information, which will possess during project implementation. To meet this demand, the Supplier must be certified for: <ul style="list-style-type: none"> ○ ISO 27001 2013 Certificate of Conformity for Information Security Management (research, design, development, production, integration, installation, customization and maintenance of computer software and automated information system. Consultancy and training services.) ○ ISO 9001 2015 Certificate of Conformity for Quality Management System (research, design, development, production, integration, installation,

	<p>customization and maintenance of computer software and automated information system. Consultancy and training services.)</p> <p>*Patent Registrations (optional).</p>
4	List of thematically and geographically relevant projects implemented in the last 5 years (CV of the company). Indicate please the number of experts of your organization involved in each mandate.
5	* <u>CVs and IDs of the proposed experts (7 minimum)</u>
6	Technical proposal including a detailed list of activities proposed and the respective deliverables.
6	Financial Proposal: daily fee of the proposed experts (all taxes included), differentiating between senior experts and junior experts. In addition, costs for travel, accommodation and per diems.

- **Timetable of the procurement**

Date	Activity
Launching/Publication	
26.06.2020	Call Publication
03.07.2020	Deadline for submission
13.07.2020	Decision by internal committee
14.07 2020	Contracting and start of work

- **Administrative aspects**

Applicants can submit questions to: info.albania@savethechildren.org within 29 June 2020. Kindly allow 2 (two) working days for the reply. **Deadline for submission of Applications is 3rd July, 2020.** The offer shall be submitted in English in a sealed envelope. **Financial offer should be submitted in a separate envelope. On each envelope should be written in a clear way the full name of the tender you are applying to.**

Address: The complete offer is to be submitted to the following address:

Please do not open

Save the Children Albania country office
Street. "Komuna e Parisit", Lagjia 8,
Building 1 Maji, Vila "Lami"; P.O. Box 8185
Tel: +355 4 2261840 / +355 4 2261929 / +355 4 2266227
Fax: +355 4 2263 428

E-mail: info.albania@savethechildren.org

Late submissions: Bids submitted too late cannot be taken into consideration. They will not be opened and will be destroyed.

Award decision: All bidders will be informed in writing of the award decision.

- **Conditions**

- The rates to be offered will be accepted in ALL with all taxes included. This includes VAT claims and overhead costs, but not reimbursable costs (accommodation, transport and per diem). Costs for travel, accommodation and per diem are regulated in the Annex to the contracts based on internal rules of SDC. The rates are fixed and do not change, despite of the tax system changes.
- There is no appeal or reconsideration procedure foreseen and the decision by the evaluation committee (and/ or SDC) is final.
- An important evaluation criterion is the quality and adequacy of the proposed experts. The experts proposed by a bidder must be effectively available for the implementation of the mandate. The unavailability of the proposed experts is a rightful reason for not going into project agreement with a bidder.
- Save the Children Child Safeguarding Policy: As a condition of entering into a consultancy agreement, the individual/s or agency must sign Save the Children International Child Safeguarding Policy and abide by the terms and conditions thereof.

- **Confidentiality**

All information of any kind that comes to the attention of the bidder in connection with the tendered mandate of the awarding authority is to be treated as confidential. The content of the present tender may only be made available to persons taking part in the preparation of the bid.

The tender documentation may not be used for any other purposes than preparation of the bid, even in extracts.

Bidders treat facts as confidential that are not public knowledge or publicly available. In cases of doubt, facts are to be treated as confidential. This obligation to secrecy remains valid even after

conclusion of the tender procedure.

The awarding authority undertakes to maintain confidentiality about this bid towards third parties subject to the reserve of statutory publication requirements.

- **Integrity**

Bidders undertake all necessary measures to avoid corruption, especially not to offer or accept payments or other advantages.

The bidder notes that a violation of the integrity clause leads as a rule to the cancellation of the award or to early termination of the contract by the contracting authority for important reasons.

The Parties shall inform each other in case of any well-founded suspicions of corruption.

Appendices:

SCI Code of Conduct

SCI Fraud Bribery & Corruption Policy

SCI Child Safeguarding Policy

Policy Title:	Code of Conduct
Version:	1.0
Approved Date:	29 th January 2014
Approved by:	Madalyn Brooks, Chief of People Officer
Author:	Joan Coyle, HR Director
Review Date:	29 th July 2017

SECTION I

I.1 POLICY STATEMENT

This policy - the Code of Conduct - applies to Save the Children International (SCI) employees, trustees, volunteers, interns, trainees, contractors and consultants and others who represent our organisation. The policy applies to us 24/7, 365 days a year, and is as relevant and applicable to our personal life as it is to our professional life. For this reason, all those who work for SCI or who represent the organisation in any capacity are required to sign a declaration confirming that they have read and understood the Code of Conduct and agree to comply with the requirements of the Code at all times.

- SCI is a rights based organisation. Those who work for SCI, in whatever capacity, endorse the concept of human rights in general and children’s rights in particular, and commit to respecting those rights in all our decisions and actions.
- SCI’s work is based on deeply held values and principles. It is essential that our commitment to children’s rights and humanitarian principles is supported and demonstrated by all employees and other representatives. If any of us fails to act in a way that is consistent with our values and principles, we fail as an organisation.
- Our ability to achieve our aims, often in complex and insecure environments, is linked to our reputation. This reputation relies heavily on everyone who works for us upholding and promoting high standards of conduct. Working for SCI means you are accepting a special responsibility for safeguarding human rights in general and children’s rights in particular.
- The basic values of SCI require that we observe the laws, customs and traditions of countries worked in or visited. In cases where such laws, customs or traditions contravene the UN Convention on the Rights of the Child and/or the Universal Declaration of Human Rights, these latter two shall prevail. They are founded on the conviction that all children and adults are of equal value, children have special rights and everyone has a responsibility to uphold those rights.
- If you are a manager, you have a particular responsibility to set a good example; and to create a working environment that supports employees and other representatives in upholding these standards and that helps you to manage behaviour that breaches the Code of Conduct.
- With this common rights perspective, we strive for exemplary behaviour and the realisation of effective and reliable work for children’s rights. We consider that it is of the utmost importance to ensure that

all resources are used in an appropriate and effective way, be they personal or economic resources, and that they are used for the means for which they are designated.

- In order to make this Code of Conduct come alive within Save the Children, we must not only apply it individually but also be ready to bring to the attention of relevant senior managers within SCI any potential incident, abuse or concern that we witness or of which we are made aware.

SECTION 2

2.1 PRINCIPLES

The Code of Conduct requires that all those who work for SCI, in whatever capacity, sign up to and adhere to the principles set out in the statement below:

1. I will respect others:

- I will respect the basic rights of all human beings, regardless of gender, disability, ethnicity, religion, caste, language, HIV status and other aspects of identity. I will act fairly, honestly and tactfully in order to treat people with dignity and respect.
- I will not take part in any form of discrimination, harassment, or abuse (physical, sexual or verbal), intimidation or exploitation, or in any other way infringe the rights of others.

2. I will work actively to safeguard children:

By carrying out my special responsibility for children to whom SCI has a duty of care and by creating a safe environment for children in order to prevent their physical, sexual or emotional abuse or neglect.

I will:

- Comply with all relevant policies and procedures
- Attend all required training
- Report any concerns about the welfare of a child or the behaviour of an adult

I will not:

- act in any way that breaches SCI's Child Safeguarding Policy and procedures or in any way places children at risk of harm;
- Withhold information about any current criminal convictions, charges or civil proceedings relating to child abuse, either when I join SCI or arising during my time of employment with SCI or during the period in which I am representing SCI in any capacity.

3. I will maintain high standards of personal and professional conduct:

By striving for high standards in my work, taking responsibility for my actions and not abusing my position of power as a representative of SCI. I will not behave in a way that undermines my ability to do my job or is likely to bring SCI into disrepute.

I will not:

- engage in sexual relations with anyone under the age of 18, or abuse or exploit a child in any way

- exchange money, employment, goods or services for sexual favours or engage in any form of sexual exploitation
- drink alcohol or use any other substances in a way that affects my ability to carry out my role or affects the reputation of the organisation
- be in possession of, nor profit from the sale of, illegal goods or substances
- ask for or invite any personal payment, service or favour from others, especially beneficiaries, in return for our help, support, goods or services of any kind
- accept bribes or significant gifts (except small tokens of appreciation) from governments, beneficiaries, donors, suppliers or others which have been offered as a result of my employment or other representational role with SCI
- enter into any sort of business relationship on behalf of Save the Children with family, friends or other personal/professional contacts for the supply of any goods or services to SCI or any employment related matters without authorisation.
- view, download, create or distribute inappropriate material, such as pornography, on SCI computer/systems, or any other computer systems, including my own personal property.

4. I will seek to protect the safety and wellbeing of myself and others:

- By being aware of and complying with local SCI health & safety and security policies and practices and highlighting any areas of concern to management.
- I will not behave in a way that causes unnecessary risk to myself or others.

5. I will protect Save the Children’s Assets and Resources:

- By handling our financial and other resources carefully, ensuring that SCI’s resources are not mis-used and protecting them from theft, fraud and damage.
- I will not release to others any private and confidential information relating to SCI (or for which we are responsible) unless legally required to do so.

6. I will report any incident or concern that relates to, or may relate to, a breach of this Code of Conduct.

- I recognise that in order to realise our ambitious goals for children, SCI must effectively report and respond to any fraud, misconduct or wrongdoing by our employees and representatives; and that employees/representatives are therefore expected to raise any concerns they may have about the conduct of others or the way we operate as an organisation.
- Therefore I **will** raise any matter that I believe are in breach of – or may be in breach of - the Code of Conduct through the appropriate channels.

SECTION 3

3.1 SUPPORTING/RELATED DOCUMENTATION

Links to Supporting Documentation	
I.	UN Convention on the Rights of the Child UN Declaration of Human Rights UN Secretary-General’s Bulletin on the Prevention of Sexual Exploitation and Abuse

2.	SCI Child Safeguarding Policy
3.	SCI Whistleblowing Policy
4.	SCI Disciplinary Policy
5.	Personal Declaration form

SCI POLICY: FRAUD, BRIBERY AND CORRUPTION

Functional Area:	Fraud Management
Owner (Name + Position):	Head of Fraud – Josephat Groenewegen
Approved by:	Chief Risk Officer – Dominiek Vangaever
Date of Approval:	03 July 2018

Version:	
Date for Review:	03 July 2021
Languages (inc. hyperlinks):	English
Applicable to:	<ul style="list-style-type: none"> • SCI staff including agency workers, seconded workers, volunteers, interns, contractors and consultants • Third parties including partners, suppliers, distributors, agents and advisers

SECTION 1: PURPOSE

<p>The purpose of this policy and accompanying procedure is to:</p> <ul style="list-style-type: none"> • Set out our responsibilities as an organisation and how SCI will achieve our aim to observe and uphold our zero-tolerance approach to fraud, bribery and corruption in our work including with any third party that SCI engages with; and • Provide information and guidance to those working for SCI on how to recognise and deal with fraud, bribery and corruption. <p>Where the guidance in this policy conflicts with any applicable laws or regulations, the higher standard must at all times be observed, so that SCI is compliant with all applicable laws and regulations.</p> <ul style="list-style-type: none"> • All SCI staff including agency workers, seconded workers, volunteers, interns, contractors, consultants, and agents are responsible for ensuring compliance with this policy, with the Senior Management Team (SMT) in each country and region taking lead responsibility for implementing and raising awareness of this policy. • SCI employees must ensure third parties working with SCI are made aware of and understand their obligations under this policy. • Each supplier, partner and consultant must confirm their knowledge of and adherence to the principles of this policy as part of their contractual relationship with SCI. • All employees will be required to undertake and be able to demonstrate they have completed the compulsory fraud awareness training (either face-to-face or through the SCI Fraud Awareness e-learning module) within the first three months of their employment or three months following the publication of this policy for existing employees.

SECTION 2: POLICY STATEMENT(S)

1	SCI is committed to acting professionally, fairly and with integrity in our work and relationships in all the countries in which we work. SCI takes its moral, legal and ethical responsibilities extremely seriously and has put in place effective systems to protect against fraud, bribery and corruption in our organisation
2	SCI takes a “ zero-tolerance approach ” to fraud, bribery and corruption, which means SCI is committed to the highest standards of corporate governance, fiduciary duty, responsibility and ethical behaviour. Fraud, bribery, and corruption diminishes our impact for children, undermining the viability of our organisation, and breaching the trust placed in us by our donor community.

3	All SCI employees are responsible for taking all necessary and appropriate steps to prevent, deter, and detect fraud, bribery, and corruption within their areas of responsibility.
4	SCI employees should consider fraud, bribery, and corruption risks at the outset of any new activity and take practical steps to mitigate those risks through a comprehensive fraud risk assessment at programme design stage.
5	SCI is committed to taking all appropriate corrective actions, including disciplinary, legal or other actions, in light of any findings of fraud, bribery, or corruption with respect to relevant individuals (including those who have committed fraud and/or anyone who knew of such fraud but failed to act). SCI will take steps following any incidents of fraud, bribery, or corruption to review controls and protocols to identify and address any gaps or weaknesses.
6	As a UK charity, SCI is bound by the laws of England and Wales, including for these purposes the Fraud Act 2006 and the Bribery Act 2010, in regards to our conduct both at home and abroad. SCI will uphold all local laws relating to fraud, bribery and corruption in all the jurisdictions in which we operate.
7	SCI employees who are guilty of bribery and corruption could face a criminal prosecution resulting in imprisonment. If SCI is found to have taken part in corrupt activities, we may be subjected to regulatory censure, unlimited fines, be excluded from tendering for institutional funding, and face serious damage to our reputation. All these have a direct negative impact on the children we are trying to help and it is with this in mind that SCI fully commits to preventing fraud, bribery and corruption in our organization.
8	SCI has a responsibility to keep our Donors and Members fully informed and promptly updated on any suspicion of fraud relating to their funds
9	Suspicious of fraud, must be reported through one of the official reporting channels (as described in the fraud, bribery & corruption procedure). Any information relating to a suspicion of fraud must be treated with utmost confidentiality and not be shared with any third party other than those identified as part of the defined reporting channels.

SECTION 3: DEFINITIONS

Word/Term	Definition
FRAUD	<p>An act of deception intended for personal gain to obtain an advantage, avoid an obligation or to cause loss to another party even if no such gain or loss is in fact caused. For the purpose of this policy, fraud also covers the dishonest appropriation of property belonging to another, with the intention of permanently depriving them of it.</p> <ul style="list-style-type: none"> • <u>embezzlement</u>: improperly using funds, property, resources, or other assets belonging to SCI for their own personal advantage instead; • <u>collusion</u>: improperly colluding with others to circumvent, undermine, or ignore our rules, policies, or guidance (e.g. fixing the amounts of a tender in order to bring it below a certain threshold); • <u>abuse of a position of trust</u>: improperly using one's position within Save the Children for personal benefit (e.g. accessing confidential

	<p>material or passing confidential information) or with the intention of gaining from, unfairly influencing or depriving the organisation of resources, money and/or assets;</p> <ul style="list-style-type: none"> • <u>nepotism or patronage</u>: improperly using employment to favour or materially benefit friends, relatives, or other associates, or where someone requests that a Save the Children employee offer employment or some other advantage to a friend or relative (e.g. awarding contracts, jobs, or other material advantages); • <u>false accounting</u>: deliberately entering false or misleading information into accounts or financial records (e.g. entering false refunds or voids through the till in a retail shop); • <u>false invoicing</u>: knowingly creating or using invoices that are false in any way; • <u>expenses fraud</u>: dishonestly using the expenses system to pay money or other benefits to which the recipient is not entitled; • <u>payroll fraud</u>: dishonestly manipulating a payroll system to make unauthorised payments (e.g. by creating ‘ghost’ employees or by increasing an individual’s salary); • <u>tax or duty evasion</u>: knowingly avoiding the payment of tax or any other duty that a person is aware should be paid; • <u>forgery</u>: dishonestly creating or altering documents to make any information in the document incorrect or misleading often with the effect of depriving the organisation of resources, money and/or assets; • <u>brand fraud</u>: dishonestly using Save the Children’s name, branding or documentation for personal or private gain; • <u>obstructing proper process</u>: threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; • <u>failing to disclose information</u>: not providing accurate and complete information relevant to your position which will adversely impact your ability to perform your role; for example, failure to disclose a ‘conflict of interest’
BRIBERY	<p>Offering, promising, giving, soliciting or accepting any financial or other <i>advantage</i>¹, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for <i>acting improperly</i>², or where the recipient would act improperly by accepting the advantage. The outcome or reward for which the bribe is offered or given never actually has to occur for it to be a bribe; the promise of such an outcome/reward is sufficient.</p>

¹ An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value

² A person acts improperly where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind

	<ul style="list-style-type: none"> • <u>paying or offering a bribe</u>: give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given; • <u>receiving or requesting a bribe</u>: accept a payment, gift or hospitality from a third party including from government officials, representatives or other politicians that you know or suspect is offered with the expectation that it provides them or anyone else an advantage in return; • <u>receiving improper benefits</u>: give or accept a gift or provide any hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence SCI's decision-making; • <u>receiving a 'kickback'</u>: improperly receiving a share of funds or a commission from a supplier as a result of involvement in a bid, tender or procurement exercise.
CORRUPTION	<p>The abuse of entrusted power or position for private gain. It relates to dishonestly accepting, obtaining or attempting to obtain a gift or consideration as an inducement or reward for acting, or omitting to act.</p> <ul style="list-style-type: none"> • <u>facilitation payments</u>: typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are an inherent risk in Fragile and Conflict affected states and constitute a form of diversion of aid from reaching those intended and potential sources of criminal and or terrorist financing. • <u>improperly seeking to influence a public official</u>: to obtain or retain a business or other advantage either directly, or through a third party by offering, promising or giving a financial or other advantage that is not legitimately due to the official or another person at the official's request or with his/her assent or agreement.
CONFLICT OF INTEREST	<p>A Conflict of Interest arises where an employee has a private or personal interest which may, or could be perceived to, compromise their ability to do their job. Actual, potential (could develop) or perceived (could be considered likely) conflicts of interest can arise across all areas of our work. Conflicts may be of a personal, financial or political nature.</p> <p>A conflict of interest would arise when an employee or agent, any member of his or her immediate family, or an organisation which employs any of his family, has a financial or other interest in, or a</p>

	<p>tangible personal benefit from, a firm considered for a contract.</p> <p>To protect the integrity of SCI processes, all employees, partners, volunteers, interns, consultants, contractors and other third parties must immediately declare any actual or perceived conflict of interest between any personal, private interest and SCI's work</p>
<i>THIRD PARTIES</i>	<p>Any individual or organization SCI comes into contact with during the course of our work, and includes actual and potential clients, customers, partners, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.</p>

SECTION 4: RELATED DOCUMENTS

1	<p>SCI Fraud Awareness E-learning Module https://www.savethechildrenlearning.org/mod/scorm/view.php?id=5357</p>
2	<p>SCI Fraud, Bribery & Corruption Procedure</p>
3	<p>Whistleblowing Policy and Procedure</p>
4	<p>Code of conduct</p>

Functional Area:	Child Safeguarding
Owner (Name + Position):	Helle Thorning-Schmidt , Chief Executive Officer, Save the Children International
Approved by:	Senior Leadership Team
Date of Approval:	20/11/2018
Version:	V2
Date for Review:	20/11/2019 (1 year for the initial review and then every three years).
Languages (inc. hyperlinks):	English, French, Spanish, Arabic plus any other language as needed to ensure the document is fully understood
Applicable to:	All SCI staff, trustees and all others involved in the work of SCI including, but not limited to, secondees volunteers, interns, and third parties connected with SCI, including partners, implementing partners, consultants, contractors, and visitors to Country Offices.

SECTION I: PURPOSE

<p>Safeguarding the children that we come into contact with throughout our work is a key priority for Save the Children International (SCI)</p> <p>Within Save the Children, Child Safeguarding is making Save the Children safe for children. It is our individual and collective responsibility to ensure all children are protected from deliberate or unintentional acts that lead to the risk of, or actual, harm caused by Save the Children staff, representatives, partners, volunteers, contractors and visitors to our country programmes.</p> <p>SCI acknowledges fully the duty to safeguard and promote the welfare of children, and ensure all our safeguarding measures are embedded, accessible and communicated clearly to staff, partners, children and their communities, in a language they understand.</p> <p>SCI is aware that there may be additional vulnerabilities facing children associated with their age, socio-economic background, disability, gender, racial heritage, religious belief, sexual orientation or identity, and is committed to ensuring this does not form barriers to effective safeguarding.</p> <p>SCI will take all reasonable steps to make itself safe, both as an organisation and in the conduct of all aspects of its day-to-day operations of emergency, humanitarian, developmental, policy and campaigning work.</p> <p>SCI's Board, including a Safeguarding Trustee, plus the Senior Leadership Team, will ensure that adequate steps are taken to best reflect the cost of implementing this policy in operational plans, budgets and funding proposals.</p> <p>This includes:</p> <ul style="list-style-type: none"> <input type="checkbox"/> providing an appropriate safeguarding staffing infrastructure for SCI; <input type="checkbox"/> providing finances, information, guidance, training, learning and development at regional, country and program levels; <input type="checkbox"/> assigning a designated Board Member with the responsibility for child safeguarding oversight through proactively 'checking and challenging' that safeguarding is effective throughout the organisation, and is considered in relevant Board decisions; <input type="checkbox"/> implementing appropriate responses to alleged breaches of this policy; <input type="checkbox"/> providing 'Minimum Safeguarding Requirements' to ensure consistency of safeguarding provision across SCI and its partner network.
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Save the Children International commits to:

- valuing and listening to all children and young people;
- ensuring that all staff and people directly associated with our work understand their personal responsibility to prevent and report any form of child abuse and sexual exploitation of children;
- diligently implement our child safeguarding system by applying relevant policies, procedures, training and other learning opportunities across SCI and with our partners and relevant third parties;
- ensuring that the organisation creates the right culture and a safe and trusted environment for anyone to report child safeguarding incidents and/or concerns verbally or in writing and through child friendly and accessible mechanisms;
- all safeguarding actions and decisions are taken in the best interests of the child and put the safety and welfare of the child first;
- reporting suspected or known child safeguarding concerns, violations of this policy and Code of Conduct through the SCI incident reporting system (DATIX) within 24 hours of the incident coming to SCI's attention. Local reporting requirements for child abuse and potential criminal offences also apply and should be done in accordance with applicable legal standards;
- ensuring that detailed and accurate records of all safeguarding concerns are collected, processed and stored securely, in accordance with the relevant data protection laws;
- implement systems and processes to ensure we do not knowingly employ or contract anyone who poses a risk to children or brings them into contact with children connected to SCI;
- applying the safeguarding components as set out within the partnership procedures and tools;
- addressing failure to comply with this policy without delay, which may ultimately result in termination of contracts or agreements, including dismissal;
- prompt reporting of serious child safeguarding incidents, by the SCI legal team, to the Charity Commission and other law enforcement agencies and regulators as required.

This policy has been approved in its entirety and must not be modified or customised without the express authorisation of the Senior Leadership team through the Chief People Officer, Save the Children International.

SECTION 2: POLICY STATEN (S)

List each policy statement, outlining the principles that govern the way SCI works.

I- Child Safeguarding System:

Humanitarian workers and other representatives of INGOs, such as Save the Children, are placed in a position of special trust by the populations they serve. When that trust is exploited and standards for safeguarding children fail, immense damage is caused with long-term effects on the lives of children and their families, and implications for the credibility and reputation of the organisations involved. Save the Children has a zero-tolerance approach to child abuse and sexual exploitation of children by our staff, our partner's staff and those who represent us. SCI's Child Safeguarding system is made up of four key areas: Awareness, Prevention, Reporting and Response. Each of these areas has activities that continue throughout the life

cycle of our development and humanitarian work in the countries we operate in either directly or through partners. We adopt a child centred approach to child safeguarding.

2 - Definition and Scope:

- SCI defines a child as anyone under the age of 18
- The highest standards of safeguarding must be applied across all of SCI's programmes and offices and applied to all SCI staff. The policy also applies to secondees, volunteers, interns, and third parties connected with SCI, including partners, implementing partners, consultants, contractors, and all visitors to Country Offices.
- This policy covers all forms of child abuse. Save the Children recognises five categories of child abuse, which are sexual abuse, physical abuse, emotional abuse, neglect and exploitation. Other sub-categories may be adopted from time to time. The policy also covers any poor safeguarding practice.

3 - Implementation and Review

- SCI's Child Safeguarding Policy will have an initial review after one year and then after every three years.
- SCI's Child Safeguarding Policy and procedures together with the SCI Code of Conduct covers all aspects of our operations and programming and will be implemented in all SCI country programs, regional offices, Centre and any other office or program operating under the auspice of SCI.

4 - AWARENESS AND PREVENTION

Dissemination/Awareness Raising

- SCI will ensure the Child Safeguarding Policy, Code of Conduct and reporting procedures and mechanisms are made widely available and publicised to children, their carers, all staff, partner staff and all relevant third parties and stakeholders and in a language and format, they understand.
- All visitors to SCI programs or offices who will have contact with children will be made aware of the SCI Child Safeguarding Policy, relevant procedures and Code of Conduct and the behaviour and conduct expected of them.

5 - Personal Responsibility

All staff, representatives of SCI and third parties connected with SCI must demonstrate the highest standards of behaviour and conduct towards children both in their private and professional lives. They have a responsibility to understand and promote the Child Safeguarding Policy, procedures and the Code of Conduct. They must do all that they can to prevent, report and respond immediately to any child safeguarding concerns.

'Unacceptable behaviour and conduct' refers to committing any acts of physical, emotional or sexual abuse, neglect or exploitation of a child and putting them at risk of deliberate or unintentional harm; non-compliance with policies and procedures and failing to take appropriate action to prevent or report any violations and poor safeguarding practice.

It is the responsibility of every individual contracted or associated with SCI's work to make sure incidents that breach the SCI Child Safeguarding Policy, Code of Conduct and other related policies are reported and recorded through the appropriate mechanisms.

6 - Recruitment, induction and training of staff

Safer recruitment: SCI ensures its recruitment processes are rigorous, in line with statutory requirements and best practice guidance. These processes include the use of DBS or police checks where available on all employees, and checking three references.

SCI reserves the right to terminate contract negotiations or refuse to engage an individual, if appropriate criminal record checks are not undertaken, or cannot be undertaken for roles that are identified as working with or having contact with children. This will also apply in the event where background and reference checks reveal that the person is not suitable to work with Save the Children or has omitted key information.

All staff, volunteers and interns are required to complete mandatory Child Safeguarding training within a designated time period from joining the organisation and attendance is recorded.

- Country office staff are required to complete mandatory safeguarding on-line awareness training within the first working week, with an additional face to face training provided within the first 90 days or prior to travelling to the field and having direct contact with children in our project areas;
- SCI Centre staff, volunteers and interns are required to complete the online child safeguarding awareness session within the first week of joining the organisation and attend a child safeguarding face-to-face induction training within 90 days of starting.

7- Ensuring our work is safe for children through Safer Programming

Safer Programming is a crucial element of our child safeguarding approach and commitment to 'Do No Harm' as a result of the initiatives and activities within all of our programmes and humanitarian responses. This includes our media, advocacy and campaigns work. All areas of work must be resourced appropriately to prevent, mitigate and manage the risk of abuse, exploitation and harm to children at every stage of the project cycle.

SCI will, as far as possible, provide a safe physical environment for children by applying health and safety measures in accordance with relevant law and regulatory guidance. We will comply with the relevant industry/sector standards and promote good practice within all thematic areas in which we work.

This will be achieved by:

- ensuring risks to children's safety and well-being are identified and assessed and managed from program design to exit;
- carrying out risk assessments for activities involving children or those, which have a direct impact on children. This includes any construction carried out by SCI or a third party on SCIs behalf, research, advocacy and media campaigns and events and travel involving the participation of children;
- ensuring child friendly reporting response and feedback mechanisms are in place;
- integrating child safeguarding into the project planning and management cycle, including monitoring, evaluation, accountability and learning;
- child safeguarding forms part of SCI's thematic 'common approaches' which set out our best understanding of how to solve a particular problem for children and improve our quality and impact for children;
- child safeguarding is integrated into all of our functions including, but not limited to, programme quality and impact, operations, supply chain, logistics, IT, Awards, Human Resources, safety and security, partnerships, advocacy, campaigns, media and communication;
- resources for child safeguarding are included in every program design, project proposal and budget.

For further information refer to the 'Safer Programming Procedures' and 'Child Safe Programming Guidelines'.

8 - Comprehensive Safeguarding Risk Assessment from 'design to delivery and exit' for all programmes, projects and humanitarian responses. This includes working with and through partners.

No program, project or proposal will be approved until a thorough safeguarding risk assessment has taken place which will include:

Step 1: Identifying the level of contact with children;

Step 2: Identifying the risks to children inherent in the thematic areas of work/ approaches, operational procedures and systems and delivery of activities;

Step 3: Assessing the individual program, project or organisation's focus on

children;

Step 4: Assessing the strength of safeguarding systems already in place, including appropriate training and application and embedding of relevant policies and procedures;

Step 5: Assessing the potential risk posed by the individual program/project or organisation, identifying mitigating factors as the result of Steps 3 and 4;

Step 6: Establishment of the overall contextual safeguarding risk and a decision to proceed or not;

Step 7: Resource Plan and agreements to mitigate and manage risks;

Step 8: Monitoring of any action plan and/or agreement in place within the programme, project or partner.

For further information refer to the 'Partnership Procedures' and the 'Safer Programming Procedure and Guidelines'.

9 - REPORTING AND RESPONSE

Reporting and Investigations

- Save the Children is committed to a robust reporting and investigation procedure which leads to timely and effective reporting and investigation involving the right internal or external professionals
- All staff, partner staff, implementing partner staff, contractors, visitors and volunteers are mandated to report any suspected child safeguarding incidents or concerns to the SCI Country Child Safeguarding Lead or Focal Point; and Child safeguarding concerns involving criminal conduct reported to the relevant statutory authority unless to do so would place the child at additional risk of harm or there is another justifiable risk in reporting
- There is no threshold for reporting a child safeguarding concern as described in this policy. Any concern, however minor, must be reported;
- All suspected or actual incidents are to be reported as a matter of urgency and always within 24hrs of a person becoming aware of the incident;
- SCI's Regional Child Safeguarding Directors are to notify the relevant Member via the DATIX system of a suspected incident or concern within 48 hours of receiving a report and no later than 5 business days;
- Save the Children Members are responsible for notifying donors as per their contractual requirements;
- Incidents must be reported through the on-line reporting system (DATIX) which allows anyone working for SCI and with an SCI email address contracted by the Centre, Regional and Country Offices to report incidents in a safe and confidential manner and must be used by SCI employees;
- Non-SCI staff can report verbally or in writing through local reporting procedures;
- Where required SCI's legal department will report serious safeguarding incidents to the Charity Commission and UK law enforcement agencies;
- Taking no appropriate action when there is a concern regarding the welfare of a child is not an option; SCI staff, trustees and all others involved in the work of SCI including but not limited to secondees, volunteers, interns, and third parties connected with SCI recognise that the failure to report is a breach of the Child Safeguarding Policy.

For further information refer to SCI's Reporting, Response & Case Management Procedures and Investigation Procedures.

10 - Poor Safeguarding Practice

Poor safeguarding practice takes place whenever staff or any other person fail to provide the standard of care and support expected and directed by policies, procedures and training delivered by SCI. Poor safeguarding practice can occur through non-compliance with policies and procedures and when staff and third parties to whom this Policy applies ignore the rights and welfare of beneficiaries. Continued poor safeguarding practice may cause harm and can become abuse.

SCI takes poor safeguarding practice seriously and deems it unacceptable. Poor safeguarding practice must be reported. All reported cases of poor safeguarding practice will be dealt with in line with SCI safeguarding policies and/or disciplinary processes.

Examples of poor safeguarding practice include:

- when insufficient care is taken to prevent harm;
- allowing abusive or concerning practices to go unreported;
- placing children or young people in potentially compromising and uncomfortable situations with adults, including through the use of technology/social media;
- ignoring health and safety guidelines;
- failing to adhere to SCI's construction policy and procedures;
- failing to adhere to supply chain procedures which result in risk or harm to child/children;

SCI's mandatory 'Child Safeguarding Procedures' must be followed at all times.

11 - Humanitarian Responses

SCI has a commitment to protecting people affected by natural disasters and human-induced crises and to prevent and reduce the violence, exploitation and deprivation faced by people in such situations.

SCI recognises that children living in areas affected by humanitarian crises are particularly vulnerable. All organisations and third parties implementing SCI's disaster risk reduction and humanitarian preparedness and response activities must assess safeguarding risks, apply, and build on this policy's minimum child safeguarding requirements. Development and implementation of humanitarian response strategies and activities must identify, mitigate and manage child safeguarding risks. This includes safer recruitment and safer programming approaches.

For more information, see the Child Safeguarding in Humanitarian Procedure.

12 - Online Safeguarding

SCI believes that online safety is an essential part of safeguarding. SCI will enable internet content filtering and evaluate other online safety mechanisms periodically to ensure that this policy and any linked policies are consistently applied.

SCI will, as far as possible:

- identify approaches to educate and raise awareness of online safety throughout our programs
- enable all staff to work safely and responsibly, to role model positive behaviour online and to manage professional standards and practice when using technology;
- identify clear procedures to use when responding to online safety concerns;

- SCI will develop, where appropriate, project interventions that can influence online behaviour change, teach resilience and promote prevention, in addition to providing general guidance on online safety where possible.

SCI’s mandatory ‘Child Safeguarding Procedures’ must be followed at all times.

13 - Relevant Laws & Endorsements

This policy will be implemented in accordance with:

- All relevant UK laws protecting children from abuse, violence and harm and those outlining measures for reporting known or alleged cases of abuse;
- Applicable laws within the countries where SCI operates; and
- The United Nations Convention on the Rights of the Child (UNCRC), The UN Secretary General’s Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) and other applicable international treaties, laws, and conventions.

14 - Data Protection

Compliance with data protection law and policies must be central to all our processing of children’s personal data. All SCI staff, representatives and third parties collecting children’s data on SCI’s behalf or in relation to any of our work must adhere to SCI policies, procedure and practice or ensure their own mechanisms comply with legal requirements for data protection.

15 - Compliance and Audit

Compliance with policy and procedures is monitored through reviews and a program of safeguarding audits and spot checks. This includes downstream partners, sub-grantees, contractors and suppliers. ‘**Minimum Safeguarding Requirements**’ will be applied across SCI country programs and during spot checks.

Requirements will be monitored by a cycle of audits, including annual self-audit, and other internal teams including but not limited to the Regional Child Safeguarding Directors and, when required, by external experts.

16 - Reporting to the Board

All serious child safeguarding cases will be reported to the SCI Board at their board meetings. An annual Safeguarding Report will be submitted to the SCI Board.

SECTION 3: DEFINITIONS

Word/Term	Definition
Child Safeguarding Save the Children’s definition)	Child Safeguarding is making Save the Children safe for children. It involves our collective and individual responsibility and actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm by Save the Children staff, representatives and third parties, who come into contact with children or impact them through our development interventions, humanitarian responses and operations. This includes our direct programme implementation, work through partners and management of children’s personal data

Child	Everyone under the age of 18*
Child Abuse	Child abuse consists of anything, which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of a safe and healthy development into adulthood.
Physical Abuse	Physical abuse is the non-accidental use of physical force that deliberately or inadvertently causes a risk of/ or actual injury to a child. This may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing non-accidental physical harm to a child. Physical harm can also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness or temporary, permanent injury or disability of a child.
Neglect	Neglect includes but is not limited to failing to provide adequate food, sufficient or seasonally appropriate clothing and /or shelter. Neglect is also failing to prevent harm; failing to ensure adequate supervision; failing to ensure access to appropriate medical care or treatment or providing inappropriate medical treatment (e.g. administering medication when not authorized); or failing to provide a safe physical environment (e.g. exposure to violence, unsafe programming location, unsafe sleeping practices, releasing a child to an unauthorized adult, access to weapons or harmful objects, failing to child-proof a space that children will occupy etc.). It can also be SCI staff, partners, contractors and sub-grantees failing to apply minimum requirements as set out in mandatory procedures.
Emotional Abuse	Emotional abuse involves doing harm to a child’s emotional, intellectual, mental or psychological development. This may occur as an isolated event or on an ongoing basis. Emotional abuse includes but is not limited to any humiliating or degrading treatment (e.g. bad name-calling, threats, yelling/screaming/cursing, teasing, constant criticism, belittling, persistent shaming etc.), failure to meet a child’s emotional needs, and rejecting, ignoring, terrorizing, isolating or confining a child.
Sexual Abuse	Sexual abuse is the involvement of a child in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Adult males do not solely

	perpetrate sexual abuse. Women can also commit acts of sexual abuse, as can other children.
Exploitation and child labour	<p>Child exploitation is an umbrella term used to describe the abuse of children who are forced, tricked, coerced or trafficked into exploitative activities. For Save the Children child exploitation includes modern slavery and trafficking of children and children forced or recruited into armed conflict. Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity;</p> <p>(a) in exchange for something the victim needs or wants, and/or</p> <p>(b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.</p> <p>Child sexual exploitation does not always involve physical contact; it can also occur with the use of technology. Within Save the Children child sexual abuse and exploitation also includes child early and forced marriage.</p> <p>Child Labour is work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It is work that:</p> <ul style="list-style-type: none"> • is mentally, physically, socially or morally dangerous and harmful to children; and • interferes with their schooling by: <ul style="list-style-type: none"> • depriving them of the opportunity to attend school; • obliging them to leave school prematurely; or • requiring them to attempt to combine school attendance with excessively long and heavy work. <p>If a young person, under the age of 18 is part of an apprenticeship scheme within the statutory law of the country and does not meet any of the above, this would not be considered by SCI as child labour. However, any contractor or sub-contractor must inform SCI of the name of any apprentice who will be directly involved with our work.</p> <p>For Save the Children it is not acceptable for any staff or representatives to engage anyone under the age of 18 to work as domestic help in their place of work or at home.</p>

SECTION4: RELATED DOCUMENTS

1	SCI Code of Conduct
2	SCI Child Safeguarding Procedure
3	SCI Procedure Global Recruitment and On-boarding
4	SCI Child Safe Programming Guidelines
5	SCI Reporting, Response and Case Management Procedures and Guidelines
6	SCI Investigation Procedures and Guidelines
7	SCI Child Safeguarding in Humanitarian Procedure
8	SCI Partnership Procedures and tools
9	SCI Child Safeguarding Minimum Requirements Framework
10	UN Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13 http://www.unhcr.org/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protection-sexual-exploitation.html)
11	SCI Anti-Harassment Policy
12	SCI Accountability Guidance Pack in English, French, Spanish and Arabic
13	SCI Social Media Policy
14	SCI Image Guidelines
15	SCI Child Safeguarding Media and Comms Guidelines
16	Children and the GDPR: Information Commissioners Office Guidelines