

SCI POLICY: CHILD SAFEGUARDING POLICY

Functional Area:	Safeguarding
Owner (Name + Position):	Susan Grant, International Safeguarding Director
Approved by:	Veesh Sharma, Interim Chief Risk Officer
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Applicable to:	All SCI REPRESENTATIVES ¹ and all Save the Children Member employees deployed/seconded to or visiting SCI offices and programs.

¹ Bold capitalisation of words denotes that this is a specifically designed term and to refer to Section 3 Definitions.

SECTION 1: PURPOSE

Safeguarding the children that we come into contact with throughout our work is a key priority for Save the Children International (SCI)

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.

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, volunteers, children and their communities, in a language and format they understand.

SCI is aware that there may be additional vulnerabilities facing children associated with their age, socio-economic background, disability, gender, racial heritage, religious belief, actual or perceived sexual orientation, gender identity and expression, and other individual characteristics and their intersectionality. SCI is committed to ensuring that these factors do not create a barrier to effective safeguarding.

SCI will take all reasonable steps to make itself safe for children, both as an organisation and in the conduct of all aspects of its day-to-day operations, including humanitarian, development, policy, advocacy, media, communications and campaigning work.

SCI's Board-level risk appetite for child safeguarding is 'minimal/low risk'. This means that SCI is willing to limit the achievement of programme or advocacy objectives if those objectives result in risk to children's safety and/or wellbeing above this level. SCI's risk appetite on child safeguarding remains the same in 'enhanced conditions' (for example, humanitarian responses).

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.

This Includes:

- providing an appropriate and effective safeguarding staffing infrastructure for SCI;
- providing finances, information, guidance, training, learning and development at regional, country and program levels;
- assigning a designated Board Member with the responsibility for child safeguarding oversight through proactively 'checking and challenging' SCI to ensure that safeguarding is effective throughout the organisation, and is considered in relevant Board decisions;
- implementing appropriate responses to alleged breaches of this policy;
- providing 'Minimum Safeguarding Requirements' to ensure consistency of
- Safeguarding provision across SCI and its partner network.

Save the Children International Commits to:

- Valuing, listening and respecting all children and young people;
- ensuring that all staff and people directly associated with our work understand their personal responsibility to prevent harm 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 Risk Officer, Save the Children International**.

SECTION 2: POLICY STATEMENT(S)

1	<p>Child Safeguarding System:</p> <p>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, volunteers, our partners' staff and those who represent us.</p> <p>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, humanitarian and advocacy work in the countries we operate in either directly or through partners. We adopt a child-centred approach to child safeguarding.</p> <p>For further information, please refer to the Global Child Safeguarding Protocol.</p>
2	<p>Definition and Scope:</p> <p>SCI defines a child as anyone under the age of 18</p> <p>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.</p> <p>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.</p>
3	<p>Implementation and Review</p> <ul style="list-style-type: none"> • SCI's Child Safeguarding Policy will have an initial review after one year and then after every two 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	<p>AWARENESS AND PREVENTION</p> <ul style="list-style-type: none"> • Dissemination/Awareness Raising • SCI will ensure the Child Safeguarding Policy, Code of Conduct and reporting procedures and mechanisms are made widely available, accessible and publicised to children, their carers, all staff, partner staff, volunteers 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	<p>Personal Responsibility</p> <p>All staff, volunteers, representatives of SCI and third parties connected with SCI must demonstrate the highest standards of behaviour and conduct towards children in their both private and professional lives, 24 hours a day, 7 days a week. 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 (within 24 hours) and respond immediately to any child safeguarding concerns.</p> <p>‘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.</p> <p>For further information please see annex 1 – sample list of unacceptable behaviour</p>
6	<p>Recruitment and Induction Training of Staff</p> <p>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 is a signatory to the IASC Inter-Agency Misconduct Disclosure Scheme and has committed to share relevant HR information relating to sexual misconduct with other NGOs when references are requested.</p> <p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • 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

	<p>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.</p> <ul style="list-style-type: none"> All staff are required to attend refresher Child Safeguarding Training at least once every two years
7	<p>Ensuring our work is safe for children through Safer Programming</p> <p>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, communications, 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.</p> <p>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.</p> <p>This will be achieved by:</p> <ul style="list-style-type: none"> ensuring risks to children’s safety and well-being are identified and assessed and managed from program design to exit, including children with disabilities; 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, accessible and effective reporting response and feedback mechanisms are in place and monitored; 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, humanitarian, 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. <p>For further information, refer to the Child Safe Programme Guidelines’</p>
8	<p>Comprehensive Safeguarding Risk Assessment from ‘design to delivery and exit’ for all programmes, projects and humanitarian responses. This includes working with and through partners, and any reliance on the use of volunteers to deliver programmes.</p> <p>No program, project or proposal will be approved until a thorough safeguarding risk assessment has taken place which will include:</p> <p>Step 1: Identifying the level of contact with children, and the unique risks associated with the target group of children (e.g. age, gender, disability, ethnicity, prior trauma or adverse childhood experiences);</p>

	<p>Step 2: Identifying the risks to children inherent in the thematic areas of work/ approaches, operational procedures and systems and delivery of activities;</p> <p>Step 3: Assessing the individual program, project or organisation’s focus on children;</p> <p>Step 4: Assessing the strength of safeguarding systems already in place, including appropriate training and application and embedding of relevant policies and procedures;</p> <p>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;</p> <p>Step 6: Establishment of the overall contextual safeguarding risk and a decision to proceed or not;</p> <p>Step 7: Resource Plan and agreements to mitigate and manage risks;</p> <p>Step 8: Monitoring of any action plan and/or agreement in place within the programme, project or partner.</p> <p>For further information refer to the Safer Partnership tools and Child Safe Programming Guidance.</p>
9	<p>REPORTING AND RESPONSE</p> <p>Reporting and Investigations</p> <ul style="list-style-type: none"> • Save the Children is committed to a robust, confidential 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; • Where appropriate, SCI’s local Survivor’s Advocate/Liaison will work closely with the survivor(s) and their caregivers, to ensure a survivor-focus is always in place • 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;

	<ul style="list-style-type: none"> • Non-SCI staff can report verbally or in writing through local reporting procedures; or via the safeguarding@savethechildren.org or whistleblowing@savethechildren.org email addresses • Where required SCI's legal department will report serious safeguarding <ul style="list-style-type: none"> ○ 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.
10	<p>Poor Safeguarding Practice:</p> <p>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.</p> <p>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.</p> <p>Examples of poor safeguarding practice include:</p> <ul style="list-style-type: none"> • when insufficient care is taken to prevent harm; for example, in failing to complete adequate risk assessments and take mitigating actions • allowing abusive or concerning practices to go unreported; • placing children or young people in potentially compromising, dangerous or 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;
11	<p>Humanitarian Responses</p> <p>SCI has a commitment to protecting children affected by natural disasters and human-induced crises and to prevent and reduce the violence, exploitation and deprivation faced by people in such situations.</p> <p>SCI recognises that children living in areas affected by humanitarian crises are particularly at risk of harm and abuse. 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.</p>
12	Online Safeguarding

	<p>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.</p> <p>SCI will, as far as possible:</p> <ul style="list-style-type: none"> • 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; including their own personal social media use • 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. <p>SCI's mandatory Child Safeguarding Processes must be followed at all times.</p>
13	<p>Relevant Laws & Endorsements</p> <p>This policy will be implemented in accordance with:</p> <ul style="list-style-type: none"> • 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	<p>Data Protection</p> <p>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.</p>

15	<p>Compliance and Audit</p> <p>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.</p> <p>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.</p>
16	<p>Reporting to the Board</p> <p>All serious child safeguarding cases will be reported to the SCI Board at their board meetings. Safeguarding will be a standing agenda item on the Board agenda.</p> <p>An annual Safeguarding Report will be submitted to the SCI Board.</p>

SECTION 3: DEFINITIONS

Word/Term	Definition
Child Safeguarding (Save the Children's definition)	Child Safeguarding is making Save the Children <i>safe</i> 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 <i>risk of or actual</i> 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 18¹
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	<p>Neglect includes but is not limited to failing to provide adequate food, sufficient or seasonally appropriate clothing and /or shelter.</p> <p>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.</p>
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	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;

(a) in exchange for something the victim needs or wants, and/or

(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.

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.

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:

- ❑ is mentally, physically, socially or morally dangerous and harmful to children; and
- ❑ interferes with their schooling by:
 - ❑ 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.

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.

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. It is not acceptable for Save the Children to engage anyone under the age of 18 to undertake any work which may be considered harmful.

SECTION 4: RELATED DOCUMENTS

1	SCI SG Safeguarding Policy Framework Document EN.pdf
2	SCI SG Annex 1 Child Safeguarding Policy EN.docx
3	SCI SG Safeguarding Risk Assessment & Risk Directory EN.xlsx
4	SCI SG Safeguarding Focal Point (SFP) ToR EN.docx
5	SCI SG Investigations & Case Management Procedure EN.docx
6	SCI SG Protection from Sexual Exploitation, Abuse & Harassment Policy EN.doc.docx
7	SCI SG Protection from Sexual Exploitation, Abuse & Harassment Procedure EN.docx
8	SCI HR POL Code of Conduct EN.pdf,
9	SCI SG Safeguarding Humanitarian Procedure EN.docx SCI SG Safeguarding in Emergencies Toolkit EN.pdf
10	IASC 6 principles relating to SEA
11	SCI HR POL Anti-Harassment Intimidation and Bullying Policy EN.pdf
12	SCI LEG Modern Slavery & Human Trafficking Policy POL ENG.docx,
13	SCI HR POL Whistleblowing Policy EN.pdf
14	SCI SG Guidance Local Safeguarding Procedures Mapping EN.docx SCI SG Appendix i SCI Safeguarding Legal Mapping Tool Template EN.xlsm SCI SG Appendix ii SCI Safeguarding Legal environment questionnaire EN.docx
15	SCI SG Annual CO Safeguarding Self-Assessment EN.xlsx SCI SG RASCI Safeguarding Activities EN.xlsx
16	SCI SG Contact Sheet Victim Survivor Support EN.docx
17	SCI SG Appendix iv SCI Safeguarding Victim support questionnaire EN.docx
18	SCI HR POL Disciplinary Policy EN.pdf
19	SCI SG Child Safe Programming Guidance EN .pdf
20	SCI SG Guidance PSEAH one-pager EN.pdf
21	SCI SG Safeguarding & Social Media (Field-Friendly Guidance) EN.pdf SCI SG Safeguarding & Social Media (Full Written Guidance) EN.pdf
22	SCI COM Social Media Guidelines EN.docx
23	SCI Social Media Policy
24	SCI COM Safeguarding Content Gathering,Communicaitons & Media Quick Guide EN.pdf SCI COM Safeguarding Children in Media and Comms Work EN.pdf FOR MEDIA - Visiting our work - Guidance for media working with SC UPDATED AUG 2022.pdf
25	Global Diversity, Equity and Inclusion policy English French Spanish Arabic Portuguese
26	SCI SG Safeguarding & Digital Technology Tipsheet EN.pdf