

Policy Title	Safeguarding and Counter-Human Trafficking Policy
Version No.	SG-01
Effective Date	3/25/2024
Summary	This Policy describes Save the Children’s commitments to safeguarding children and adults in the communities we serve and to preventing Human Trafficking, including standards of conduct applicable to all Representatives.
Implementing Procedures	Safeguarding and Counter-Human Trafficking Procedures
Approver	Senior Leadership Team
Policy Owner	General Counsel
Point of Contact	Managing Director of Safeguarding
Applicability	<input checked="" type="checkbox"/> Save the Children Federation, Inc. <input checked="" type="checkbox"/> SCUS Head Start <input checked="" type="checkbox"/> Save the Children Action Network <input checked="" type="checkbox"/> Other: Sub-awardees, vendors, suppliers, consultants, and others with whom we provide assets in exchange for services or products (collectively, “Partners”)
Legal / Compliance Requirements or Other Standards	USAID ADS 303 Mandatory Standard Provisions on Trafficking in Persons (July 2015), and Safeguarding Against Exploitation, Sexual Abuse, Child Abuse, And Child Neglect (October 2023), Inter-Agency Standing Committee (IASC) Six Core Principles Relating to Sexual Exploitation and Abuse
Applicable Code of Ethics Principle	Principal 1 – Safeguarding is at the core of every decision that we make. Principal 5 – We raise our concerns, even if we are not sure something bad has happened

Purpose

This Policy, together with the Save the Children [Code of Ethics](#) and the Save the Children Global Child Safeguarding Protocol set out the commitments of Save the Children Federation, Inc., Save the Children Action Network, and SCUS Head Start Programs (collectively “SCUS”) to safeguarding and are fundamental to our mission and values.

Safeguarding is how we make SCUS *safe* for the children and adults who live in the communities where we operate. It refers to our individual and collective responsibility to prevent and respond to actions and omissions by our Representatives, whether deliberate or inadvertent, that place children and adults in the communities that we serve at risk of any kind of harm, abuse, or exploitation, including Human Trafficking.

Scope

This Policy is intended to cover all aspects of SCUS' activities. It applies to all SCUS Representatives (including employees, volunteers, interns, consultants, and Trustees), as well as SCUS Partners and Program Visitors.

SCUS Representatives must demonstrate the highest standards of behavior and conduct, both in their private and professional lives, 24 hours a day, and 7 days a week. When traveling to other countries, SCUS Representatives will also follow the applicable policies of Save the Children International or other Save the Children Association Members.

The Policy applies to Program Visitors while visiting SCUS Programs or attending SCUS events.

SCUS' Sub-awardees will be required to comply with this Policy or their own substantially similar policy when implementing part of a SCUS program. Other Partners will also be required to comply as per donor conditions and when provided with access to SCUS program participants or their data.

Policy Statement(s)

Upholding Our Legal Duties and Children's Rights

SCUS will comply with all applicable laws and donor requirements concerning child protection, child welfare, nondiscrimination, human trafficking, and the prevention of sexual exploitation and abuse. In addition, we affirm our commitment to the [Inter-Agency Standing Committee's Six Core Principles on Protection from Sexual Exploitation and Abuse](#), the Save the Children Global Child Safeguarding Protocol, and the Save the Children Disability Inclusion Policy. Where the SCUS Safeguarding Policy standard is higher than the applicable law, the SCUS' Policy shall be followed.

SCUS is committed to giving primary consideration to the best interests of children and children's rights in all actions we take related to preventing and responding to safeguarding violations. These rights include the child's right to life and development, the child's right to be heard/participate, and the child's right to non-discrimination as set forth in the United Nations Convention on the Rights of the Child. SCUS recognizes that certain individuals are at increased safeguarding risk, including children with disabilities, and we will take additional care to ensure that we protect their rights.

Behavioral Guidelines and Prohibited Conduct

SCUS Representatives and Program Visitors will review and adhere to the Safeguarding Behavioral and Conduct Guidelines in all their interactions with children and adults, including program participants and community members. Consistent with these materials, **SCUS prohibits all forms of Abuse, Exploitation, Human Trafficking, and Discrimination against child and adult program participants and community members**, including, without limitation, the following:

- Physical Abuse, Emotional Abuse, or Neglect of children.
- Engaging in any form of sexual activity with anyone under the age of 18 regardless of the age of consent locally. This includes grooming a child for sexual purposes. Ignorance or mistaken belief in the age of a child is not a defense.
- Engaging in sexual activity with an adult program participant or the caretaker of a child program participant, except in the circumstance that such relationship predates one or both parties' involvement with SCUS. Representatives are required to disclose any pre-existing relationships to their line manager.
- Exchanging money, employment, goods, or services for any form of sexual activity, including sexual favors or other forms of humiliating, degrading, or exploitative behavior. This includes exchanging assistance that is due to people participating in, or eligible for, SCUS Programs or buying or procuring sex acts from anyone at any time even when commercial sex transactions would be legal in the jurisdiction where they would occur.
- Engaging or attempting to engage in any form of sexual abuse or sexual harassment toward any program participants and community members, including any child or adult.
- The use of forced labor or engaging anyone under the age of 18 in any form of illegal or harmful child labor.
- The recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of any activity prohibited by this policy.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents or engaging in other activities that contribute to Human Trafficking.
- Discriminating against program participants or community members, including any child or adult, on any basis, including but not limited to race, ethnicity, religion, sex, sexual orientation, gender identity, disability, or any other basis prohibited by federal, state, or local law.

See Annex 1 for definitions for the prohibited behaviors outlined above and Annex 3 for additional detail on activities that contribute to Human Trafficking.

Essential Standards

Per the standards set out in the Save the Children Global Child Safeguarding Protocol, SCUS will adopt, maintain, and adhere to agency-wide procedures with respect to awareness and training of staff, prevention, reporting, and incident response. The People & Culture Division shall also maintain appropriate policies, procedures, and practices to combat human trafficking as set out in [Annex 3](#). In addition, SCUS Divisions may develop

internal procedures and guidance to address safeguarding-related risks in their areas of responsibility, so long as they are consistent with this Policy and its associated procedures and guidance.

To ensure that safeguarding considerations are always prioritized, if any other agency Policy or Procedure appears to conflict with this Policy, this Policy shall prevail.

Reporting and Incident Response

All SCUS Representatives and Visitors must report concerns, suspicions, and known violations of this Policy or its Procedures - no matter how trivial the issue may seem - within 24 hours of becoming aware of the concern. Reports may be made anonymously. Reporting pathways include:

- **By phone:** (844) 287-1892
- **Online:** [SavetheChildren.EthicsPoint.com](https://www.savethechildren.org/ethicspoint)
- **By email:** safeguardingscus@savechildren.org or hotline@savechildren.org
- **In person:** Speak with your manager, HR Business Partner, or a safeguarding practitioner. Managers, HR Business Partners, and safeguarding practitioners are required to report all allegations of Safeguarding policy violations disclosed to them to EthicsPoint within 24 hours.
- **International programs:** Employees traveling to international programs are required to report concerns via Datix or to the local Safeguarding Focal Point. Upon return from travel, employees must inform the SCUS National Safeguarding Team of any concerns, suspicions, or known incidents that have been reported.

Where Partners have safeguarding reporting requirements under their agreements with SCUS, they must also report concerns, suspicions, and known violations of this Policy through the channels noted above.

Representatives and Visitors reporting concerns or complaints will be protected from any form of retaliation or negative employment consequences, per Save the Children's Reporting and Resolving Policy Violations or Other Concerns Policy. Failure to report and/or knowingly reporting false information will be considered a breach of this Policy and may result in disciplinary action.

Information concerning suspected or reported safeguarding incidents should be treated as Confidential as defined in the Data and Information Classification Policy. Personal details concerning individuals involved in safeguarding incidents is Sensitive Personal Information, as defined in the Personal Information Protection Policies. The collection and use of this information is governed by the relevant provisions of those policies.

All safeguarding concerns, suspicions, and incidents as well as any potential violations of this Policy will be thoroughly examined and where needed, investigated by SCUS' National Safeguarding Team. Where a Representative leaves SCUS prior to the

commencement or completion of a safeguarding investigation and any subsequent disciplinary process, the process will continue, and a clear outcome will be recorded.

Ensuring a Survivor-Centered Approach

SCUS is committed to safeguarding approaches that put survivors at the heart of this Policy and related Guidance or Procedures. This means that the safety, dignity, and well-being of the survivor are the primary considerations in all steps SCUS takes to prevent and respond to concerns of safeguarding policy violations. Survivors have the right to decide whether they wish to be involved in any investigation. If desired, and with the informed Consent or Assent of the survivor, survivors will be referred to support services, which may include but are not limited to medical, psychosocial, and legal assistance. Support will be provided to survivors of safeguarding policy violations regardless of status or outcome of an investigation, including when a survivor does not wish to participate in an investigation.

Zero-Tolerance

SCUS has a zero-tolerance approach to Abuse, Exploitation, Human Trafficking, Harassment, and Discrimination against program participants and community members by any of our Representatives. Failure to adhere to the requirements set out in this Policy is a serious disciplinary breach and will result in disciplinary action up to and including termination of employment.

For Partners, violation of this Policy or their own substantially equivalent policy, failure to comply with contractual reporting requirements, and failure to take appropriate corrective action may result in suspension or immediate termination of the agreement and may also result in the party being deemed ineligible for future agreements with SCUS.

Exception Approval Procedure

Procedure/ Action	Action Owner
Exceptions to this policy requires written approval by the Vice President, General Counsel	Person seeking exception to policy
File and retain exception approval	General Counsel

Version Control

Version number	Version Date	Revisions made
SG-01	3/25/2024	New comprehensive Policy which includes PSEA, Adult Safeguarding, and Human Trafficking
CS-01.7	12/15/2021	Updates to match new titling structure
CS-01.6	10/01/2020	Revisions of existing Child Safeguarding Policy
CS-01.5	02/01/2019	Revision of existing Child Safeguarding Policy

CS-01.4	04/12/2017	Updated format
CS-01.3	07/25/2016	Revision of existing Child Safety Policy

Annex 1 – Definitions

Term/Acronym	Definition
Assent	Assent is the expressed willingness or agreement of the child that is unable to give informed consent due to their age or maturity.
Child	Anyone under 18 years of age.
Best interest of the child	A commitment to ensuring that the child’s wellbeing and interests are always the primary priority.
Child Abuse	Anything which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood. Abuse may occur through direct contact, online or without the knowledge of the child. Child Abuse includes Physical Abuse, Emotional Abuse, Neglect, Sexual Exploitation & Abuse, and Exploitation.
Child Labor	Work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development. It includes work that is illegal, is mentally, physically, socially, or morally dangerous and harmful to children, or 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.
Child Protection	Our programmatic area of work aimed at protecting children from all forms of abuse and exploitation in all regions of the world.
Child Welfare	Making the community safe for children. It refers to risks that are <i>external</i> to SCUS programs/operations. Child Welfare matters are required by law or local norms to be reported to local authorities, which may include familial, communal, or institutional child abuse allegations.
Children with disabilities	Children who have long-term physical, mental, intellectual, or sensory impairments which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others.
Consent	Informed consent is an ongoing agreement which is freely given based upon a clear appreciation and understanding of the facts, implications, and future consequences of an action.
Discrimination	The treatment of one individual differently than another because of that individual’s membership in, or affiliation with, a protected category, or that of the individual’s relatives, friends, or associates.

	<p><i>Protected categories can be found in SCUS' Policy and Procedures Regarding Discrimination, Harassment and Workplace Culture.</i></p>
Emotional Abuse	<p>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, failure to meet a child's emotional needs, and rejecting, ignoring, terrorizing, isolating, or confining a child.</p>
Exploitation	<p>An umbrella term used to describe the abuse of children and adults who are forced, tricked, coerced, or trafficked into exploitative activities. Exploitation includes modern slavery and trafficking and children forced or recruited into armed conflict.</p> <p><i>Sexual Exploitation definition can be found below.</i></p>
Grooming	<p>Behavior that makes it easier for an offender to procure a child or vulnerable adult for sexual activity. It often involves the act of building the trust of children and/or their carers or a vulnerable adult, to gain access to them to sexually abuse them. Grooming may occur in person or online.</p>
Harassment	<p>For the purposes of this policy, harassment of program participants and community members is conduct that denigrates or shows hostility or aversion toward an individual because of that person's membership in, or affiliation with, a protected category, or that of the individual's relatives, friends, or associates, and that has the purpose or effect of creating an intimidating, degrading, humiliating, hostile or offensive environment.</p> <p><i>Sexual Harassment definition can be found below.</i></p>
Human Trafficking	<p>The recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.</p> <p>Exploitation includes, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery, or practices similar to slavery, servitude or the removal of organs.</p>

	The definition of human trafficking also includes bonded labor, debt bondage, involuntary domestic servitude, child labor, the recruitment and deployment of child soldiers, and child sex trafficking.
Neglect	Failure to meet a child’s basic physical and/or psychological needs either deliberately or through negligence.
Partner	Sub-awardees, vendors, suppliers, consultants, and others with whom we provide assets in exchange for services or products.
Physical Abuse	Non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury or suffering to a child.
Program Participant	Individuals or communities who receive direct or indirect assistance from SCUS’ activities, including but not limited to our campaigns, event, fundraising, and programming. Program participants include the caretakers of children that we support.
Program Visitors	Any non-employee, non-Representative invited to visit programs or partake in an event or activity sponsored by SCUS.
Safeguarding	How we make SCUS <i>safe</i> for the children and adults who live in the communities where we operate. It refers to our individual and collective responsibility to prevent and respond to actions and omissions by our Representatives, whether deliberate or inadvertent, that place children and adults in the communities that we serve at risk of any kind of harm, abuse, or exploitation, including Human Trafficking.
Safeguarding Practitioners	SCUS staff with dedicated safeguarding responsibilities including the National Safeguarding Team, Safeguarding Focal Points, and Safeguarding Advisors.
SCUS Representatives	Employees, volunteers, interns, consultants, and Trustees/Board Members of SCUS.
Sensitive Personal Information (“Sensitive PI”)	Sensitive PI includes certain types of information that relates to an identified or identifiable Data Subject that require additional security safeguards and other types of information that SCUS considers to be sensitive.
Sexual Abuse	<p>The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes all forms of sexual violence and coercion, sexual solicitation, manipulation, or trickery.</p> <p>Any sexual activity with children (persons under the age of 18) is considered sexual abuse.</p>
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but

	not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.
Sexual Favors	Any sexual or sexualised acts, in exchange for something such as money, goods, services, opportunities and so on. Also includes demands for inappropriate photographs, filming, and exposure to pornography and so on.
Sexual Harassment	Unwelcome conduct of a sexual nature, which has the purpose, or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, or offensive environment. Such conduct may take place on a single occasion or on several occasions.
Sub-awardees	An entity that receives a sub-award from SCUS to carry out part of a SCUS program or activity.
Survivor	The term “survivor” is used to describe a person who has experienced some form of violence, abuse, or another form of misconduct.
Survivor-Centered Approach	A survivor-centered approach is one for which the survivor’s dignity, experiences, considerations, needs, and resiliencies are placed at the center of every step we take in responding to safeguarding concerns.
Zero Tolerance	Zero tolerance refers to the principle that every allegation is taken seriously and acted upon in line with SCUS established procedures for responding to safeguarding concerns as outlined in this Policy.

Annex 2 – Safeguarding Policy Framework

In addition to this Safeguarding Policy, the Safeguarding Policy Framework sets out the ‘key documents’ that detail the organization’s safeguarding commitments and practices so that they can be consistently incorporated and operationalized.

Key Documents	Description
Code of Ethics	The Code is the overarching policy of this Framework, outlining the Agency’s Core Values and Key Principles, and linking these to workplace behaviors. The Code of Ethics emphasizes workforce expectations through five individual pledges focused on: Safeguarding; Reporting; Speaking with care, dignity, and integrity; Being a trusted voice; Upholding trust of supporters; and being a safe and supportive workplace.
Global Child Safeguarding Protocol	The Protocol ensures that SCI and each Member take all reasonable steps to make itself safe for children both as an organization and in the conduct of all aspects of its day-to-day operations of emergency, humanitarian, developmental, policy and campaigning work. The Protocol describes the standards that SCI and each Member are required to apply and monitor to ensure that any children who we come into contact with are respected and protected from abuse and sexual exploitation of any sort.
Safeguarding Behavior and Conduct Guidelines	The aim of this document is to help SCUS Representatives understand prohibited behaviors and preventative actions that relate to safeguarding and provides practical non-exhaustive list of examples of behaviors that would be considered conduct violations under key policies.
Safeguarding & Counter-Human Trafficking Procedures	These Procedures operationalize the Safeguarding & Counter-Human Trafficking Policy. The Procedures have been developed to align with the Global Child Safeguarding Protocol and outline key actions and responsibilities across all programming, operations, campaigns, and activities to ensure that SCUS is safe for children, their caregivers, and other adults in the communities in which we work.
Safeguarding Investigations & Case Management Procedures	This document sets out accountabilities and mandatory actions required during investigations and case management of safeguarding concerns.
Safeguarding Risk	While not a policy, the Safeguarding Risk Management Framework is an inter-departmental tool that identifies agency-level safeguarding risks,

Management Framework	key mitigations and controls, and trainings, policies, and procedures for addressing these risks across programs and divisions.
Head Start Child Safeguarding Policy Notebook	These policies outline additional requirements for Head Start Representatives to ensure that Head Start programs are delivered safely for children and to ensure compliance with federal Head Start rules and regulations.

In addition, certain elements of Safeguarding awareness, prevention, reporting and responding framework are addressed in other Policies, including but not limited to:

Reporting and Resolving Policy Violations or Other Concerns	Reflecting the Core Values and Key Principles in the Code of Ethics, particularly the Reporting Pledge, this Policy outlines reporting procedures including contact information, a statement of confidentiality and anonymity for the reporting party, steps that are taken during an investigation, and a statement of non-retaliation.
Background Check and Employee Disclosure Policy	Statement of policy outlining SCUS policy on pre-employment/engagement background checks, re-check policy of current employees, and policy on disclosure of personal disclosure of criminal activity process.
Alcohol and Drugs Policy	Describes the Agency’s policy with respect to illegal or recreational drugs and alcohol, including their use, possession, sale, or transfer while on or during the use of Agency property. The policy requires employees to report certain drug or alcohol-related criminal convictions and describes potential remedies for violation of the policy by employees.
Social Media Policy	This policy establishes employees’ responsibilities regarding the use of personal and official SCUS Social Media accounts while employed by SCUS. This policy establishes good use practices that will protect the employee and SCUS from damaging our reputation and putting our work at risk.
Save the Children Disability Inclusion Policy	Our Policy for Disability Inclusion guides Save the Children to program, advocate, partner and organize with and for adults and children with disabilities to enjoy their rights and fundamental freedoms on an equal basis with others.
Personal Information Protection Policy	This Policy sets out the principles SCUS applies in handling and safeguarding Personal Information entrusted to SCUS and sets out the obligations of Staff in relation to Personal Information SCUS holds or Processes. Staff members each have a responsibility in securing and protecting the Personal Information in SCUS’s care.

Workplace Culture Policy	This policy sets forth the type of behavior that violates workplace culture, including discrimination and harassment, how employees can report that behavior, and the Agency's procedures for investigating and responding to that behavior.
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Annex 3 – Human Trafficking Prohibitions

The People and Culture Division shall adopt appropriate policies, procedures, and practices to combat trafficking persons, and the following activities shall be prohibited by SCUS:

- Use of forced labour.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local Labor laws of the country in which the recruiting takes place.
- Charging employees recruitment fees.
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a SCUS contract or subcontract;
- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- Failing to provide an employment contract, recruiting agreement or other work document in writing where required by law in the language that the employee understands. If the employment requires the employee to relocate, the work document shall be provided to the employee at least five days prior to the employee relocating. The work document shall include, but not be limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs (if applicable), time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.