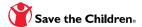


Policies and Procedures Reference No.	CS-01.2		
Policy Title	Policy on Child Safeguarding ("Child Safeguarding Policy")		
Category	Child Safeguarding		
Author	Assistant General Counsel - Compliance		
Vice President with Oversight	Vice President and General Counsel		
Approver	Senior Management Team		
Purpose and Description	These policies and related procedures describe Save the Children's commitment to child safeguarding		
Compliance Requirement	□ Statute: □ Regulation: □ Industry Standards: SCI Child Safeguarding Protocol □ Not Applicable		
Audience	 ⊠ SCUS △ All Head Start ∑ SCAN ∑ Sub-awardees, partners, vendors, suppliers, consultants and others with whom we provide assets in exchange for services or products (collectively, "Partners") ∑ Board of Trustees, Interns, and Volunteers 		
Effective date	November 5, 2015		
Revision date	November 5, 2016		
Retirement Rationale	N/A		



DEFINITIONS

- A. Child or Children: Anyone under 18 years of age.
- **B.** 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. The main categories of Child Abuse are Physical Abuse, Emotional Abuse, Neglect and Negligent Treatment, Sexual Abuse, and Sexual Exploitation.
 - 1. **Physical Abuse**: The use of physical force that causes actual or likely physical injury or suffering (e.g., hitting, shaking, burning, female genital mutilation, torture).
 - 2. **Emotional abuse:** Any humiliating or degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.
 - 3. **Neglect/Negligent Treatment**: Persistent failure to meet a child's basic physical and/or psychological needs, for example by failing to provide adequate food, clothing and/or shelter; failing to prevent harm; failing to ensure adequate supervision; or failing to ensure access to appropriate medical care or treatment.
 - 4. **Sexual Abuse**: All forms of sexual violence, including incest, early and forced marriage, rape, involvement in pornography, and sexual slavery. Child sexual abuse also may include indecent touching or exposure, using sexually explicit language towards a child and showing children pornographic material.
 - 5. 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. This includes exchange of assistance due to children benefiting from Save the Children programming. The sexual exploitation of a child who is under the age of consent is child sexual abuse and a criminal offense.
- **C.** Representatives of Save the Children: Employees, volunteers, interns, consultants, Board members, Partners and others who work with children on Save the Children's behalf, visit Save the Children's programs, or who have access to sensitive information about children in Save the Children's programs.
- **D.** Child Safeguarding: The set of policies, procedures and practices that we employ to ensure that Save the Children is a child safe organization.



POLICIES

I. Policy on Commitment to Children

Save the Children is committed to conducting its programs and operations in a manner that is safe for the children it serves and helping protect the children with whom Save the Children is in contact. All Save the Children Representatives are explicitly prohibited from engaging in any activity that may result in any kind of Child Abuse.

In addition, it is Save the Children's policy to create and proactively maintain an environment that aims to prevent and deter any actions and omissions, whether deliberate or inadvertent, that place children at the risk of any kind of Child Abuse.

All Save the Children Representatives are expected to conduct themselves in a manner consistent with this commitment and obligation. Any violations of this policy will be treated as a serious issue and will result in disciplinary action being taken, including termination and any other available legal remedy.

In furtherance of this Policy, Save the Children has adopted Procedures, described below, to promote:

- a. Prevention of Child Abuse: Striving, through awareness, good practice and training, to minimize the risks to children and take positive steps to help protect children who are the subject of any concerns.
- b. **Reporting of Child Abuse:** Ensuring that all Representatives know the steps to take and whom to contact where concerns arise regarding the safeguarding of children.
- c. **Responding to Child Abuse:** Engaging in action that supports and protects children when concerns arise regarding their well-being; supporting those who raise such concerns; investigating, or cooperating with any subsequent investigation; and taking appropriate corrective action to prevent the recurrence of such activity.
- d. **Training to Promote Awareness of Child Safeguarding Obligations:** Ensuring that all Representatives are notified of and made aware that they are expected to comply with the policy.

2. Policy to Comply with Applicable Laws and Regulations

It is Save the Children's Policy to ensure compliance with host country and local child welfare and protection legislation, or international standards, whichever affords greater protection, and with U.S. law, where applicable.

3. Policy Regarding Sexual Activity with Children

It is Save the Children's Policy that any individual under the age of 18 is a child and is "underage", regardless of the legal age of consent of the country in which s/he lives and/or in which the offense occurs. An



underage child cannot legally give informed consent to sexual activity. Save the Children considers that sexual activity with a child with or without their consent will be treated as a serious issue and will result in disciplinary action being taken, including termination, and the pursuit of any other available legal remedy.

Consensual sexual activity with a child over the legal age of consent of the country in which s/he lives and/or in which the offense occurs, but below 18 years will be treated as a serious issue and may result in disciplinary action being taken, including termination, and the pursuit of any other available legal remedy.

4. Policy on Accountability of SCUS Management

SCUS Management is committed to taking all appropriate corrective actions, including disciplinary, legal or other actions in response to any violation of the Child Safeguarding Policy, with respect to relevant individuals (including those who committed a child safeguarding violation and/or anyone who knew of such child safeguarding violation but failed to act), and taking steps following any findings of a violation of the Child Safeguarding Policy to review the applicable policies, procedures, and protocols to identify and address any gaps or weaknesses.

5. Policy on Confidentiality in Child Safeguarding Matters

SCUS has a duty to manage sensitive information in a manner that is respectful, professional and that complies with the applicable law. Staff must keep all information about any suspected or reported incidents strictly confidential, and must divulge only that information to the Child Safeguarding Focal Point (who is identified on SaveNet), Human Resources team and any other senior staff directly involved in the investigation (and in the case of incidents occurring overseas, to the relevant Country Office director), except as required by law.



PROCEDURES

Prevention of Child Safeguarding Incidents

A. Mitigating Child Safeguarding Risks in Project Planning And Implementation

- I. Where possible and practical, the 'two-adult' rule, wherein two or more adults supervise all activities where children are involved and are present at all times, should be followed.
- 2. Representatives must not stay alone overnight with one or more children benefiting from Save the Children programs who are not part of their immediate or extended family, whether in their house, project premises or elsewhere.
- 3. Representatives should not place themselves in compromising or vulnerable positions and should take care not to discriminate against, show differential treatment towards, or favor particular children to the exclusion of others.

B. <u>Background Checks</u>

Save the Children shall conduct criminal background checks on all Save the Children Representatives, and anyone who visits Save the Children's programs (e.g., journalists, donors, celebrities) and as it deems appropriate and as permitted by law.

2 Reporting of Child Safeguarding Incidents

All Representatives should know the steps to take and whom to contact when concerns arise regarding the safeguarding of children. Failure to report a reasonable suspicion of misconduct in accordance with this Policy will be treated as a serious issue and may result in disciplinary action.

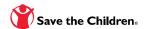
If a child is in danger or in harm's way, call 911 or the local authorities immediately.

Reporting Specifics

A. Mandatory Reporters

"Mandatory Reporters" (as defined below) must report concerns to the appropriate local authority (each state has its own reporting hotline). "Mandatory Reporters" are those individuals who are mandated by law to report child maltreatment (New Jersey and Wyoming do not have specific mandated reporters; rather they require all people to report). Individuals designated as Mandatory Reporters typically have frequent contact with children. Such individuals may include:

- Social Workers
- Teachers, principals, and other school personnel
- Physicians, nurses and other health care workers
- Child care providers
- Directors, employees, and volunteers at entities that provide organized activities for children, such as camps, youth centers and recreation centers



B. <u>U.S. Programs employees and other Representatives who have direct contact with children and all Head Start employees:</u>

Incident reports must be submitted by email to incidentreporting@savechildren.org within 24 hours. The report always should include:

- Date, time and location of the incident
- Type of incident (abuse, violence, inappropriate behavior, etc.) and nature of what happened
- The relevant actions that are happening right now

Record dates reporting to Licensing, OHS regional offices and/or state and local authorities as applicable.

C. All other Representatives

Representatives covered by this policy must report any suspicion of misconduct covered by this policy as soon as practicable to their direct supervisor (if an employee). If you feel you cannot raise the concern with your direct supervisor for any reason, or if you are a non-employee representative, you should contact the child safeguarding champion for your office or location. Alternatively, you can report the matter confidentially to the Child Safeguarding Focal Point at hotline@savechildren.org, file an anonymous report on-line at SavetheChildren.EthicsPoint.com or anonymously via phone 844-287-1892 (in the US). If you are outside of the US and would like to report by phone, go to SavetheChildren.EthicsPoint.com for a full listing of contact numbers by country.

D. Manager Responsibilities

Any manager who receives a report of any allegation of a violation of this Child Safeguarding Policy must forward the report as soon as practicable to the Child Safeguarding Focal Point at hotline@savechildren.org or file a report on-line at SavetheChildren.EthicsPoint.com.

E. Staff Overseas

When travelling or working overseas in SCI offices, you are required to report any allegations of Child Abuse to SCI in accordance with SCI's child safeguarding reporting procedures. However, you also must report any such incidents or suspicions to SCUS pursuant to these Procedures.

F. Reporting to Senior Management Team

On an annual basis, the General Counsel shall report all pending cases to the Senior Management Team and the Board of Trustees. The General Counsel or the Child Safeguarding Focal Point shall report immediately all Exceptional Cases, as defined below, to the Senior Management Team and the Child Safeguarding Champion of the Board of Directors.

3 Responding to Child Safeguarding Incidents

A. Child Safeguarding Champions



SCUS shall establish "Child Safeguarding Champions" who are trained on the specifics of the processes around child safeguarding and who will coordinate with the Child Safeguarding Focal Point, and others as appropriate, when conducting any child safeguarding investigation. The Child Safeguarding Champions can be found on SaveNet.

B. Investigating and Follow-up of Child Safeguarding Allegations

SCUS takes every allegation of a violation of our Child Safeguarding Policy seriously. The Child Safeguarding Focal Point is responsible to ensure all credible allegations are logged and tracked in the SCUS central database.

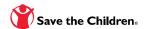
The Child Safeguarding Focal Point is tasked with following up with the other involved SCUS personnel to ensure all allegations are properly investigated and all appropriate corrective action and remedial measures are taken.

Representatives covered by this policy must cooperate fully with any investigation or inquiry by SCUS and preserve all records relating to any alleged violation of this Child Safeguarding Policy. Although we cannot guarantee confidentiality, we will keep reported concerns confidential to the extent possible.

- Initial Assessment: Upon receipt of a report, an initial assessment will be conducted by
 one of the designated Child Safeguarding Champions. A full account of the matter and any
 further action will be recorded on a Child Safeguarding Report Form. The Human
 Resources team and Child Safeguarding Focal Point will consider the circumstances of the
 report, seek professional advice and determine next steps.
- Reporting to Applicable Authorities: In the US, referrals can be made to children's services or the police as soon as possible, but must be within one working day.
 Be advised that nearly all U.S. states impose penalties in the form of fines or imprisonment for a mandated reporter who fails to timely report suspected child abuse, neglect or maltreatment of a child.
 - If the incident happens abroad, then it will be the responsibility of the relevant authorities there to organize an investigation. Irrespective of the local outcome, Save the Children staff must report (verbally and in writing) to a senior staff member at the organization/project where they are working.
- C. <u>Investigation in Exceptional Cases</u>: In cases where the allegations relate to a member of the Senior Management Team, Extended Senior Management Team, is likely to result in serious reputational injury, or other exceptional cases (collectively, "Exceptional Cases"), the Child Safeguarding Focal Point shall consult with the General Counsel and others within the Senior Management Team, as appropriate, on how the investigation should proceed, including to determine whether SCUS should retain an external party to investigate the allegations.

4 Training to Promote Awareness of Child Safeguarding Obligations

All SCUS staff must undertake an initial training on the Child Safeguarding Policy within the first six months after induction to SCUS, and/or within the first six months following the promulgation of this policy, and must take refresher trainings every two years.



Head Start employees are also required to take any state required Mandatory Reporter (as defined herein) training.

Managers at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given trainings as described above.

Other trainings will be required dependent on job specific responsibilities.

5 Agreements with Partners

All agreements with Partners (as defined above) must include this Policy as an addendum and must include a provision in which the Partner agrees to comply with this Policy (subject to the Exception Approval Procedure contained herein).

6 Communications Materials (interviews, photography and filming)

Any communications materials that include images of or information about children are subject to the Communications Guidelines attached as Annex I and included as part of this Child Safeguarding Policy

Guests on Project Visits

All Representatives of Save the Children on project visits involving children are subject to the Program Visit Child Protection Guidelines attached as <u>Annex II</u> and included as part of this Child Safeguarding Policy. Once at the project, there should be a verbal presentation made to the guests regarding appropriate conduct.

TRAINING REQUIREMENTS

Training Course	Who?	Frequency	Training moment
Child Safeguarding Policy	All	Upon induction, and then every two years	First six months after induction or within six months following the promulgation of policy
Child Safeguarding On- line Course	All	Within six months following promulgation of this policy, and then every two years	First six months after induction or within six months following the promulgation of policy



MONITORING MECHANISMS

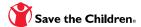
What are you monitoring?	Data source	Action Owner	Escalation levels	Frequency
Policies and procedures are being communicated to relevant audience	Attestation Exception Aging Report from the Policies and Procedures Management System	Policies and Procedures Management System Administrator	Vice President to whom the relevant persons reports.	Annual
Relevant Trainings	Human Resources training tracker	Human Resources	Vice President who has oversight of the policies and procedures manuals.	Annual

EXCEPTION APPROVAL PROCEDURE

Procedure/ Action	Action Owner
Exceptions to this policy requires written approval by the Chief Operating Officer	Person seeking exception to policy
File and retain exception approval	Policies and Procedures Management System Administrator

VERSION CONTROL

Version number	Version Date	Revisions made
CS-01.1	September 28, 2015	Revision of existing Child Safety Policy



ANNEX I COMMUNICATIONS GUIDELINES

Guidelines for ethical reporting about children

We have a responsibility to the children we represent to tell their stories in a responsible and ethical manner. The child's best interest should always be our primary consideration. We work with some of the world's most vulnerable children and communities. We want people to be motivated to support Save the Children's work. To do this, we need to show the injustice children face in a way that creates an emotional response and compels people to act to make the world a better place for children. However, in doing so we must respect the dignity and humanity of the children we serve and we must not exploit their situation in order to raise funds or attract attention for our cause.

Children and young people have all the rights of adults. In addition, they have the right to be protected from harm. Reporting on children and young people carries this added dimension and restriction, especially in the current era when it is nearly impossible to limit a story's reach. This document is meant to support the best intentions of ethical reporting – serving the public's interest for truth without compromising the rights of children.

In some instances, the act of reporting on children places them or other children at risk of exploitation, retribution or stigmatization. When in doubt, we must err on the side of caution and ensure the right of the child to be protected from harm.

Guidelines for interviewing children

- I) Do no harm to any child. Avoid questions, attitudes or comments that are judgmental or insensitive to cultural values, that place a child in danger or expose a child to humiliation, or that reactivate a child's pain and grief from traumatic events.
- 2) Ensure that the child and guardian know they are talking with a reporter. Explain the purpose of the interview and its intended use.
- 3) Assess any potential risks to the child or children, including:
 - a) Reprisals,
 - b) Stigmatization, rejection or attacks by family or communities,
 - c) Legal prosecution,
 - d) Misguided or malicious attempts by outsiders to "rescue" the child from a difficult situation.
- 4) No staging: Do not ask children to tell a story or take an action that is not part of their own history. Do not ask children to promote products contributed by corporate supporters.
- 5) Obtain permission from the child and her or his guardian for all interviews, videotaping and, when possible, documentary photographs. When possible and appropriate, this permission should be in writing. Permission must be obtained in circumstances that ensure the child and guardian are not coerced in any way and understand they are part of a story that might be disseminated locally and



- globally. This is usually ensured only if the permission is obtained in the child's language and if the decision is made in consultation with an adult the child trusts.
- 6) Pay attention to where and how the child is interviewed. Limit the number of interviewers and photographers. Try to make certain that children are comfortable and able to tell their story without outside pressure, including pressure from the interviewer. In film, video and radio interviews, consider what the choice of visual or audio background might imply about the child and her or his life and story. Ensure that the child will not be endangered or adversely affected by showing their home, community or general whereabouts.
- 7) If a child discloses bad practice during an interview (such as abuse, criminal activity or a violation of Save the Children policy), the person carrying out the interview should know the local procedures for reporting this. Staff should also be familiar with Save the Children's Child Safeguarding Policy.
- 8) No payments or any other form of compensation are to be provided to children or parents in exchange for their interview, photo or consent.

Guidelines for reporting on children

- Do not further stigmatize any child. Avoid categorizations or descriptions that expose children to negative reprisals – including additional physical or psychological harm, or to lifelong abuse, discrimination or rejection by their local communities.
- 2) Always provide an accurate context for the child's story or image.
- 3) Do not give any information that could lead to a child being identified or traced. For example, if the child is from a small village, it might be easy for the child to be identified by another villager. Provide the region or district where the child lives, rather than naming the village. Do not name the school the child attends. Use first names only.
- 4) Always change the name and obscure the visual identity of any child who is identified as:
 - a) A victim of sexual abuse or exploitation,
 - b) A perpetrator of physical or sexual abuse,
 - c) Charged or convicted of a crime,
 - d) A current or former child combatant,
 - e) HIV positive, living with AIDS or has died from AIDS, unless the child, a parent or a guardian gives fully informed consent,
 - f) Or any child who does not wish to be named and identifiable, or whose parent/guardian does not wish the child to be named and identifiable.
- 5) Always change the name and consider obscuring the visual identity of a child identified as:
 - a) An asylum seeker, a refugee or an internally displaced person,
 - b) A beneficiary of Save the Children's domestic programs or a resident of a U.S. community,
 - c) Orphaned, abandoned or separated from parents/guardians. In the case of orphans, please be sure to mention when they are in the care of relatives or guardians.



- 6) Do not change a child's identity when it is important to the child and the story. In certain cases, using a child's identity name and/or recognizable image is in the child's best interests. However, when a child's identity is used, he/she must still be protected against harm and supported through any stigmatization or reprisals. Some examples of these special cases are:
 - a) When a child initiates contact with the reporter, wanting to exercise their right to freedom of expression and to have their opinion heard.
 - b) When a child is part of a sustained program of activism or social mobilization and wants to be so identified.
 - c) When a child is engaged in a psychosocial program and is claiming their name and identity as a part of their healthy development.
 - d) When a child has died and the parent/guardian wants the child's name to be used in order to raise awareness of a problem or change policy.
- 7) When changing a child's name to protect their identity, ask them at the time of the interview what name they would prefer to be known as. If the child does not state a preference for a certain name, work with someone from the community to select a name that is culturally appropriate given the child's gender, ethnicity, religious background, etc. Whenever possible, choose a name that is short and easily pronounced/understood by an audience that may be unfamiliar with the child's culture.
- 8) Confirm the accuracy of what the child has to say, either with other children or an adult, preferably with both.
- 9) When in doubt about whether a child is at risk, report on the general situation for children rather than on an individual child, no matter how newsworthy the story.
- 10) Do not invent a tragic future the child may face "if we don't help". If the child's image or story are to be used in this way, the child and parent or guardian must see the creative treatment and give additional consent.

Guidelines for use of videos and photos including children

Quality Indicator Definitions

- Clarity Please take clear photos and videos, test sound quality and write conversationally while remaining gramatically correct.
- Composition Videos, stories and images should convey a story with a clear beginning, middle and end or imagery that conveys emotion or action.
- Context Include setting or background for the story or reference that references Save the Children's work. Describe the problem we are trying to solve or the solution to a problem. For example, feeding a hungry child or distributing books at a library.
- Compelling Take pictures and videos that would make you want to stop what you are doing and take action.

Compliance Indicators

Protection:



- Coverage (No private parts, ever. Very strict discretion around shirtless children to ensure asset does not serve as fodder for pedophiles.)
- Dignity (Is the subject portrayed as a helpless victim, or as a brave survivor who is contributing to his/her own success?)
- Care (Children in grave health or dangerous situations are not to be depicted without care e.g. a baby alone and crying; under attack, severe acute malnutrition, fresh wounds or extreme physical trauma)
- Released (Releases are required, some verbal in case of emergencies. Releases include informing
 the subject of the intended use of the photo and protecting the identity of high-risk children
 such as those in conflict settings, exploited workers, former slaves and those affected by deadly
 infectious diseases including HIV/ AIDS and Ebola.)

ANNEX II

PROGRAM VISIT CHILD PROTECTION GUIDELINES

Standards & Procedures for Child Safeguarding and Site Visits:

1.1 Uphold the agency Child Safeguarding Policy standards through signed acknowledgement, training, and application by all Save the Children visitors. Visitors are defined as staff, interns, consultants, volunteers, vendors, policymakers, talent, corporate or foundation partners, board members, etc.

Procedure:

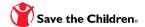
Before Site Visit:

- Prior to any contact with children, Save the Children's to review expectations for site visits with visitor(s), including an acknowledgement of the Child Safeguarding Policy.
- Provide a copy of Save the Children's child safeguarding policy to Save the Children visitor(s)
 prior to each visit. Save the Children visitor(s) must review and return a signed copy of the
 child safeguarding policy to the organizer of the site visit.
- Retain signed copies of Acknowledgement of Child Safeguarding policies per standard SC policies and practice.
- If a representative participates in multiple visits annually, he/she only needs to sign and return the policy once a year.
- In some cases, each Country Office will have additional Child Safeguarding or Ethics Conduct forms for visitor(s) to review and sign.
- 1.2 Adhere to the two-adult rule, as outlined in the SCI Child Safeguarding Policy.

Procedure:

During Site Visit:

• Children must never be left alone with visitor(s). Save the Children staff must adhere to the two-adult rule: two or more adults are required to supervise all activities where children are involved and are present at all times.



1.3 Protect the privacy and sensitive personal information of children and families.

Procedure:

Before Site Visit:

• Country office staff must explain the "Original Materials, Interviews, Film, Photos, Tape and Video Consent and Release" form to all participants of the upcoming site visit, including all caretakers, guardians, parents of children at the site. If an adult or guardian/caretaker of a child has not signed the form prior to the visit, they cannot be included in photographs, video, quotes or other materials intended for publication, marketing or other use are gathered during the visit. Copies of the release forms should be filed at the Country Office as per standard SC policies and practices.

During Site Visit:

• Do not share children's full names or locations on social media. Turn off location devices that automatically populate the location on social media. Please follow Save the Children's safeguarding guidelines for social media and communications.

After Site Visit:

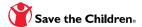
- Do not share children's full names or locations on social media. Please follow SC's child safeguarding guidelines for social media and communications.
- 1.4 Ensure all site visits are authorized, and visit procedures are followed.

Procedure:

Before Site Visit:

- All site visitors must go a thorough background check, as permissible in their market, on the sponsor and all other accompanying visitors in advance of the visit. The organizer of the visit must send the Save the Children representative a background authorization form a month in advance of the visit. The Save the Children visitor must complete, sign and return the form to the visit organizer. The Authorization to Obtain Background Reports form must be signed by hand in pen (electronic signatures are not acceptable). Save the Children does not require an original copy of the form: faxes, scans, and photocopies are fine.
- The visit organizer must submit the form and budget code to their legal department.
 Background checks can take several weeks, and cost from \$20-\$500 depending on what courts the system needs to run through. The background check is good for a year's time. The background check must be completed and cleared before the visit.
- The Country Office must secure parental/guardian permission for the site visit via a signed consent form. (link to the form used in child sponsorship)

During Site Visit:



- If a visitor arrives at a CO unexpectedly requesting a site visit, the CO should explain that a visit cannot take place because the proper forms and background checks have not been completed and notify the appropriate SC member of the request. Under no circumstances should a Save the Children guest visit a child, program or community unannounced.
- Visitors must not stay overnight with one or more children benefiting from Save the Children programs who are not part of their immediate or extended family, whether in their house, project premises or elsewhere.
- Sponsors/children may not visit children's/families' or sponsors' homes, respectively. Sponsor visits should take place in a communal, public location (e.g., not at the child's home).
- Sponsor site visits may not exceed two days.
- In the case of a violation pertaining to sponsor visits, the sponsorship relationship will be terminated if deemed necessary (after reviewed for severity of breach).