

<b>Policies and Procedures Reference No.</b>	CS-01.5
<b>Policy Title</b>	Policy on Child Safeguarding (“Child Safeguarding Policy” or CSP)
<b>Category</b>	Big 9 Policies
<b>Author</b>	National Director of Child Safeguarding
<b>Vice President with Oversight</b>	Vice President, Legal & Risk Management
<b>Approver</b>	Senior Management Team
<b>Purpose and Description</b>	These policies and related procedures describe Save the Children’s commitment to Child Safeguarding. The purpose of the policy is to ensure that Save the Children is safe for children by promoting awareness and mitigating the <i>risk of</i> or <i>actual</i> harm that may come to children by employees, representatives, programming or operations.
<b>Compliance Requirement</b>	<input type="checkbox"/> Statute: <input type="checkbox"/> Regulation: <input checked="" type="checkbox"/> Industry Standards: <input type="checkbox"/> Not Applicable
<b>Audience</b>	<input checked="" type="checkbox"/> SCUS <input checked="" type="checkbox"/> All Head Start <input checked="" type="checkbox"/> SCAN <input checked="" type="checkbox"/> Sub-awardees, partners, vendors, suppliers, consultants and others with whom we provide assets in exchange for services or products (collectively, “Partners”)
<b>Effective date</b>	02/01/2019
<b>Revision date</b>	07/01/2020
<b>Retirement Rationale</b>	N/A

## DEFINITION & ACRONYMS

- A. Child or Children<sup>1</sup>:** 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/Negligent Treatment, Sexual Exploitation & Abuse and Exploitation.
- 1. Physical Abuse:** Non-accidental use of physical force that inadvertently or deliberately causes a risk of or actual injury or suffering to a child. *Physical force* includes but is not limited to hitting, shaking, kicking, pinching, pushing/pulling, grabbing, burning, female genital mutilation, torture, and other physical acts. *Physical injury or suffering* may include but is not limited to bruises, marks, soft tissue swelling, hematomas, fractures, sprains, dislocation, burns, damage to organs, death, permanent disfigurement, and any other non-trivial injury.
  - 2. Emotional Abuse:** 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 at, teasing, constant criticism, belittling, persistent shaming, etc.), failure to meet a child’s emotional needs, and rejecting, ignoring, terrorizing, isolating or confining a child.
  - 3. Neglect/Negligent Treatment:** The failure to meet a child’s basic physical and/or psychological needs either deliberately or through negligence. Neglect includes but is not limited to failing to provide adequate food, sufficient or seasonally-appropriate clothing and/or shelter; 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.).
  - 4. Sexual Exploitation & Abuse (SEA):** All forms of sexual violence and coercion, sexual solicitation, manipulation or trickery including incest, early and forced marriage, rape, involvement in or exposure to indecent images/video (aka pornography), sexual slavery/trafficking, and statutory rape. Sexual abuse may include but is not limited to indecent touching or exposure, explicit sexual language towards or about a child and grooming. Sexual abuse does not always involve touching. *Sexual Exploitation* is 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. Be aware that technology is a tool sometimes used to sexually exploit a child.

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<sup>1</sup> “Child or Children” is not qualified only as a beneficiary child; rather, this term is inclusive of all persons under the age of 18.

The sexual exploitation and abuse of children under the age of 18 is child abuse and a policy violation. It may also constitute a criminal offense, depending upon the age of consent, local laws and customs.<sup>2</sup>

- **Grooming** is the process in which an adult builds a relationship with a child or the child's caretaker to gain the child's or the caretaker's trust for the purposes of sexually abusing and/or exploiting the child. Grooming typically occurs in phases, and it can happen online or face to face, by a stranger or by someone the child or caretaker knows. Since it is a gradual process, it can sometimes be difficult to detect. Here are a few indicators that an adult may be grooming a child or his/her caretaker:
  - a. Favoring the child over others
  - b. Providing the child with rewards or privileges
  - c. Isolating the child from others
  - d. Expressing interest in a child who is particularly vulnerable or in need of support (e.g., previous abuse of the child by another)
  - e. Befriending the parents or caretakers who are responsible to protect the child
  - f. Providing the child with alcohol or drugs
  - g. Building intimacy (i.e., having inside jokes or telling the child that nobody understands him/her like the groomer does)
  - h. Threatening, blackmailing, intimidating, or scaring a child by saying the groomer will do something to the child's family or friends

5. **Exploitation**<sup>3</sup>: The actual or attempted abuse of a position of vulnerability, power differential, or trust for the benefit of the individual leveraging their position, power, privilege, or wealth (through enticement, manipulation, coercion or trickery) to engage a child in labor, domestic servitude, forced criminality, soldiering or organ harvesting. Typically, the person(s) exploiting a child does so in order to profit monetarily, socially, or politically. It can happen to one or a group of children, in the community of origin, outside of the community, or internationally. The exploitation of a child may include but is not limited to:

- domestic servitude (e.g., cleaning, childcare, cooking, etc.)
- forced labor (commonly in factories or agriculture)
- forced criminal activities such as pickpocketing, begging, transporting drugs, manufacturing drugs, selling pirated merchandise
- used for benefit fraud
- forced to become a child soldier or join a gang

**C. Child Data:** Paper or electronic information containing Personally Identifiable Information (PII) collected for our programmatic or operational purposes.

**D. Child Protection:** Child protection is making the world safe for children. It is our programmatic area of work aimed at protecting children from all forms of abuse and exploitation in all regions of the world. Child Protection responses are macro-level in scale and involve holistic approaches

<sup>2</sup> Sexual Exploitation of anyone under 18 is a violation of this policy. Sexual exploitation of any beneficiary, irrespective of age, is a violation of our Code of Conduct.

<sup>3</sup> Exploitation of anyone benefitting from Save the Children programs or activities is a violation of the Code of Conduct.

to meet the social and legal protection needs of children and their families within vulnerable communities.

- E. Child Safeguarding:** The set of policies, procedures and practices that we employ to ensure that Save the Children is a child safe organization. Child Safeguarding is making Save the Children *safe* for children. It involves our collective and individual responsibility and preventative actions to ensure that all children are protected from deliberate or unintentional acts that lead to the *risk of or actual* harm by Save the Children staff, representatives and third parties, who come into contact with children or impact them through our development interventions, humanitarian responses and operations. This includes our direct program implementation, work through partners and management of children’s personal data.
- F. Child Welfare:** Child Welfare is making the community safe for children. It includes claims of child abuse that happen *external* to Save the Children *and/or* that are required by law or local norms to be reported to local authorities, which may include familial, communal or institutional child abuse allegations.
- G. Guest:** Any non-employee, non-representative invited into Save the Children to visit programs or partake in an event or activity sponsored by Save the Children.
- H. Personally Identifiable Information:** Any information that can be used on its own or with other information to identify, contact, or locate a single person or to identify an individual in context.<sup>4</sup>
- I. Public Communication:** Dialogue in the public sphere in order to deliver a message to a specific audience. Speaking events, newspaper editorials, advertisements, email and Social Media are a few forms of public communication.<sup>5</sup>
- J. Representative:** 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.
- K. Social Media:** Forms of electronic communication/content used to share information, comments, messages, images, video and other content via a Social Network.<sup>6</sup>

**Save the Children has zero tolerance for Child Abuse.**

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<sup>4</sup> PII definition can be found at:

[https://savechildrenusa.sharepoint.com/lc/Lists/Legal%20Resource%20Index/Attachments/145/Personally%20Identifiable%20Information%20\(PII\)%20Definition.pdf](https://savechildrenusa.sharepoint.com/lc/Lists/Legal%20Resource%20Index/Attachments/145/Personally%20Identifiable%20Information%20(PII)%20Definition.pdf)

<sup>5</sup> Social Media Policy can be found at:

<https://savechildrenusa.sharepoint.com/hr/policylibrary/Documents/Social%20Media%20Policy.pdf#search=social%20media>

<sup>6</sup> See Social Media Policy

## POLICIES<sup>7</sup>

### 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 to 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. 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 infraction and will result in disciplinary action being taken, up to and 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 when 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 adequately trained and supported in preventing, reporting and responding to safeguarding concerns; and ensuring that all Representatives are notified of and made aware of the expectation to comply with this Policy.

Save the Children will take all reasonable steps to make the organization safe as it conducts its routine operations, program implementation (via non-emergency direct implementation, emergency and humanitarian responses, recovery and development work), policy and campaigning efforts.

### 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. The requirements of this Child Safeguarding Policy are in addition to any other applicable legal requirements, including but not limited to donor requirements.

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<sup>7</sup> SCI's Child Safeguarding Policy can be found at

[https://savethechildren1.sharepoint.com/tools/QualityFramework/Documents/SCI\\_POL\\_%20Child%20Safeguarding%20Policy.pdf](https://savethechildren1.sharepoint.com/tools/QualityFramework/Documents/SCI_POL_%20Child%20Safeguarding%20Policy.pdf)

SCI Key Guidance in Child Safeguarding Documents can be found at

<https://savethechildren1.sharepoint.com/How/People/SCDocuments/Key%20guidance%20in%20child%20safeguarding%20documents.pdf>

### **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. Sexual activity with a Child with or without their consent will be treated as a serious infraction 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 infraction and may result in disciplinary action being taken, up to and 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. Disciplinary, legal or other applicable actions in response to any violation of the Child Safeguarding Policy will be taken against any individual who has committed a Child Safeguarding violation and/or anyone who knew of such a violation and failed to act or report. SCUS Management will continuously evaluate findings of violations to the Child Safeguarding Policy to identify and address gaps and/or weaknesses in applicable policies, procedures and protocols.

### **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 an SCUS Local or National Child Safeguarding Focal Point<sup>8</sup> (CSFP, identified on SaveNet) or SCI<sup>9</sup> (identified on OneNet), Legal Department, Human Resources team and/or any other senior staff directly involved in the investigation, except as may be required by law. (In the case of incidents abroad/overseas, the relevant Country Office Director may be privy to such information.)

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<sup>8</sup> The National Child Safeguarding Focal Point and National Director of Child Safeguarding are synonymous and interchangeable throughout this Policy. <https://savechildrenusa.sharepoint.com/lc/Pages/Child-Safeguarding-Focal-Point.aspx>

<sup>9</sup> Found on the left-hand menu on an excel spreadsheet. <https://savethechildrenl.sharepoint.com/how/childsafeguarding/>

## PROCEDURES

<b>I</b>	<p><b><u>Prevention of Child Safeguarding Incidents</u></b></p> <p>Department- and program-specific guidance for the prevention of safeguarding violations is located in the Annex of this policy.</p> <p style="text-align: center;"><b>A. <u>Mitigating Child Safeguarding Risks in Project Planning and Implementation</u></b></p> <ol style="list-style-type: none"> <li>1. Risk Assessments will be conducted for all programming and activities involving children or those having a direct impact on children. All programs <i>from design until exit</i> will be evaluated to ensure it meets the standards for safeguarding children. In addition to programming, other activities carried out by Save the Children, contractors or partners may include but are not limited to research, advocacy, media campaigns and events (involving child travel and/or child participation).</li> <li>2. 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, shall be followed.<sup>10</sup></li> <li>3. Representatives must <b>never</b>: <ul style="list-style-type: none"> <li>• act in ways that may be abusive or place Children at risk of abuse;</li> <li>• hit, physically assault or physically abuse Children <i>or</i> threaten to do so;</li> <li>• engage in behaviors that are physically inappropriate or sexually provocative;</li> <li>• engage in sexual activity or have a sexual relationship with anyone under the age of 18 years irrespective of the age of majority/consent or local custom;<sup>11</sup></li> <li>• stay alone overnight with one or more Children benefitting from Save the Children programs who are not part of their family, whether in their house, project premises or elsewhere;</li> <li>• have a Child beneficiary, who is not a part of their family, stay overnight at their home;</li> <li>• sleep in the same bed as a Child beneficiary or sleep in the same room as a Child beneficiary, who is not a part of the their family;</li> <li>• invite Children to stay overnight in a compound, hotel or other accommodations, domestically or internationally, with a non-relative Save the Children representative<sup>12</sup>;</li> <li>• exchange personal contact information or ask for Children’s personal information;</li> <li>• develop relationships with Children which could in any way be deemed exploitative or abusive;</li> <li>• use language, make suggestions or offer advice to Children which is inappropriate, offensive or abusive;</li> <li>• do things for Child beneficiaries of a personal nature that they can do themselves (e.g., toileting, dressing, feeding, washing, etc.);</li> <li>• condone or participate in behavior of Children which is unsafe or illegal;</li> </ul> </li> </ol>
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<sup>10</sup> Two-Adult Rule must be used because it: (1) significantly reduces the risk of an incident of abuse; (2) protects against false accusations; (3) reduces liability and a possible claim of negligence; and (4) offers additional help if there is an accident or emergency.

<sup>11</sup> Mistaken belief in the age of a child is not a defense.

<sup>12</sup> Child-beneficiaries may attend Save the Children events hosted in hotels. Children traveling with Save the Children must be given reasonable accommodations that abide by this policy.

- act in ways that shame, humiliate, belittle or degrade Children, or otherwise perpetrate any form of emotional abuse;
- discriminate against, show unfair preferential or differential treatment towards particular Child beneficiaries to the exclusion of others;
- ask to meet Children away from other adults or spend excessive time alone with Child beneficiaries away from others in a manner which could be interpreted as inappropriate; and/or
- expose Child beneficiaries to inappropriate images, films, music and websites including mature content, indecent images (pornography) and violence.

**This is not an exhaustive or exclusive list.** Representatives must, at all times, avoid actions that could be construed to constitute poor practice or potentially abusive behavior. Representatives must never place themselves in a position where they are made vulnerable to allegations of misconduct.

**B. Safe Recruitment**

*Safe Recruitment* means using recruitment processes that help keep children safe, including robust safety checking. Save the Children will only recruit representatives who are suited to work with children. Strict child safe recruitment practices apply to all candidates, which include but are not limited to confirming the candidate's identity, obtaining references, conducting interviews and completing a Background Record Check (BRC) to include criminal and sexual offender database searches.

**C. Background Record Checks - Any exception to the BRC process must be approved by the General Counsel.**

**i. Staff, Interns, Volunteers, Fellows, Trustees & Consultants**

Save the Children shall conduct **background record checks (BRCs)** on all Save the Children Staff, Interns, Volunteers, Fellows, Trustees & Consultants. To appropriately screen for Child Safeguarding indicators, BRCs must minimally include comprehensive criminal and sexual offender histories. Any BRC discrepancies must be reviewed by the National Director of Child Safeguarding and cleared by the General Counsel prior to any direct contact between the individual and children or their data.

**ii. Other Representatives & Visitors**

Save the Children shall conduct a BRC for all Representatives (e.g., donors, sponsors, site visitors, invited guests, etc.) prior to the individual's contact with children or child data and/or as it deems appropriate and permitted by law. In the alternative, non-employee Representatives may provide a letter from his/her employer identifying that: (a) a comprehensive BRC for criminal and sexual offender histories has been conducted; (b) date of last BRC; (c) there is no history of a criminal or sexual nature; and (d) there are no known concerns indicating that the individual would pose a risk to children or vulnerable adults. **(Letter template, Annex VII)**

BRCs are screening tools and are not intended to replace or remove other processes and procedures designed to keep children in our programs safe. All Save the Children staff must continue to ensure proper supervision, as outlined in this policy.

	<p style="text-align: center;"><b>iii. Journalists, Celebrities &amp; Talent</b></p> <p>Save the Children works with journalists, celebrities &amp; talent to promote and make visible the programs we implement across the globe. Protecting children from harm is paramount to successfully and safely delivering programs. Understanding the unique challenges for vetting journalists, celebrities and talent, the following protocol will be exercised without exception:</p> <ol style="list-style-type: none"> <li>1. Child Safeguarding phone briefing<sup>13</sup></li> <li>2. Risk Assessment</li> <li>3. Active Supervision within the program</li> <li>4. Talent Vetting Template<sup>14</sup></li> </ol> <p style="text-align: center;"><b>D. Policy Acknowledgements and Verbal Briefings</b></p> <p>All site and program visitors must receive and review the Child Safeguarding (short form) and sign the accompanying acknowledgement form prior to contact with Children or Child Data. On the ground, representatives and visitors will receive a verbal briefing on Child Safeguarding, for which the visit lead will be responsible. Verification of briefings will be sent to <a href="mailto:CSQuestions@savechildren.org">CSQuestions@savechildren.org</a>. (See <u>Verbal Briefing, Annex IV</u>)</p> <p style="text-align: center;"><b>E. Active Supervision of Representatives and Visitors in the Field</b></p> <p>The visit lead is responsible to ensure that all visitors are appropriately supervised during any contact with Children or Child Data and that behavior complies with this Policy. (See <b>Annex III</b> for guidance on supervising visitors.) All SCUS Staff hosting or leading visitors will understand how to safely and appropriately intervene if the Child(ren) are believed to be at risk or harmed by a visitor.</p>
2	<p><b>Reporting of Child Safeguarding Incidents</b></p> <p>All Representatives shall know the steps to take and whom to contact when concerns arise regarding the safety of children. Failure to report a concern, reasonable suspicion or knowledge of misconduct in accordance with this Policy will be treated as a serious infraction and may result in disciplinary action.</p> <p style="text-align: center;"><i>If a child is in imminent danger, call 9-1-1 or the local authorities immediately.</i></p> <p>All Head Start program visitors must wear a badge indicating that they have been properly vetted and have permission to be on site/at the program.</p> <p><b>Reporting Specifics</b></p> <p><u>Mandated Reporters</u> (Note: All Head Start and Early Head Start staff are Mandated Reporters)</p> <p>“Mandated Reporters” are required by US law to report all Child Abuse concerns to the appropriate local authority. Each state has its own definition of “Mandated Reporter,” reporting requirements and reporting hotline. Individuals designated as “Mandated Reporters” typically have frequent contact with children and may include:</p> <ul style="list-style-type: none"> <li>• Social Workers</li> </ul>

<sup>13</sup> 1-3 are the processes for Media and Journalists and are managed by Media, Communications and Fundraising (MCF)

<sup>14</sup> Celebrity and Talent Acquisition are responsible for completing this tool

- Child care providers, teachers, principals, and other school personnel
- Physicians, nurses and other health care workers
- Entities that provide organized activities for children (e.g., camps, youth center, rec centers)

If a Child Safeguarding Policy violation is suspected or known, please note that there may be a dual reporting requirement - local authorities and the Save the Children reporting system. Not all policy violations will be reportable to local authorities (e.g., failure to use the Two-Adult Rule) and the local Child Safeguarding Focal Point or National Child Safeguarding Focal Point should be contacted if additional support or instruction is needed.

#### **A. All SCUS Staff & Representatives**

All reports of suspected or known violations to this Policy must be submitted via EthicsPoint/NavEx within 24-hours of occurrence or upon learning of the violation. For overseas reporting requirements, please refer to **section C** below (“Staff Overseas”). All Representatives covered by this Policy may report the concern:

- i. to their direct supervisor (if an SCUS employee);
- ii. to the local or National Child Safeguarding Focal Point;
- iii. directly to EthicsPoint/NavEx anonymously or in name.

The report always should include:

- Date, time and location of the incident;
- Nature of what happened;
- Relevant actions that are happening at the time of the report to keep the Child(ren) safe; and
- Any immediate help or actions required

Head Start and other school staff (via direct implementation or partner programs) must record the date that the concern was reported to Licensing, OHS regional offices and/or state and local authorities as applicable.

A suspected or known Child Safeguarding violation can be reported anonymously or in name online at **SavetheChildren.EthicsPoint.com** or 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](http://SavetheChildren.EthicsPoint.com) for a full listing of contact numbers by country. The US hotline processes reports in English and Spanish.

#### **B. Manager Responsibilities**

Any manager or local Child Safeguarding Focal Point who has knowledge of or receives a report of a known or suspected violation of this Policy **must** report it immediately by filing a report online at [SavetheChildren.EthicsPoint.com](http://SavetheChildren.EthicsPoint.com).

#### **C. Staff Overseas**

As an SCUS Representative, when **traveling or working** overseas in SCI offices, suspected or known allegations of Child Abuse must be reported to *both* SCI and SCUS.

	<p>Secondees and SCI Representatives must report all concerns and/or suspected or known Child Safeguarding violations alleged to have occurred in SCI Country Offices to Datix<sup>15</sup> within 24 hours of its occurrence or knowledge of the incident.</p> <p><b>D. <u>Reporting to Senior Management Team at SCUS</u></b></p> <p>On a quarterly basis, the General Counsel and National Director of Child Safeguarding shall report aggregated incident data to the Senior Management Team (SMT), and the General Counsel shall report such data at a minimum annually to the designated trustees on the Board of Trustees. The General Counsel or the National Director of Child Safeguarding shall immediately report all exceptional cases, as defined below in 3(C), to appropriate members of the SMT and the designated trustee on the Board of Directors.<sup>16</sup></p>
<p><b>3</b></p>	<p><b><u>Responding to Child Safeguarding Incidents</u></b></p> <p><b>A. <u>Child Safeguarding Focal Points</u></b></p> <p>SCUS shall establish and maintain local Child Safeguarding Focal Points (CSFPs) to support direct implementation, emergency domestic responses and partner programming. An integral part of the SCUS framework, CSFPs are Save the Children employees trained and appointed to support programs and operations in our continued effort to ensure that Save the Children is safe for the Children. Their responsibilities include:</p> <ul style="list-style-type: none"> <li>• Be the first point of contact for Child Safeguarding concerns raised by members of staff and other SCUS representatives;</li> <li>• Liaise with the national team on employee-related Child Safeguarding issues prior to initiation of any action or inquiry into the incident at the local level;</li> <li>• Support staff during the investigation process;</li> <li>• Provide basic advice &amp; guidance on Child Safeguarding concerns;</li> <li>• Conduct and/or facilitate staff training on Child Safeguarding with support from the National Child Safeguarding Focal Point;</li> <li>• Provide consultation on <i>child welfare</i> issues by helping members of staff to identify issues of abuse and neglect and how to report to the local authorities; and</li> <li>• Ensure that suspected or known Child Safeguarding violations are reported via EthicsPoint and any other accompanying reports (i.e., child protective services, licensing, OHS) are filed.</li> </ul> <p>CSFPs are available to receive Child Safeguarding reports and provide overall support to the wider implementation of policies and procedures to safeguard children, namely the Child Safeguarding Policy and other related policies and documents such as the Code of Conduct and Reporting Grievances Policy.</p> <p>A list of the local and National Child Safeguarding Focal Points can be found on SaveNet (Operations → Child Safeguarding → Resource Page → Child Safeguarding Focal Point).<sup>17</sup></p>

<sup>15</sup> Datix is an online system, and all SCI and Member staff have access to it. The link to Datix can be found on the right hand menu at <https://savethechildren1.sharepoint.com/how/childsafeguarding/>. If the online system is not working, there is an offline form that must be completed and submitted within 24 hours of the alleged incident.

<sup>16</sup> While the process for SCI reporting is not explicit in the current policy, SCI has begun to report quarterly to its Board. The SCI policy addresses escalation of “serious child safeguarding cases” to the SCI Board on page 8 of its policy.

[https://savethechildren1.sharepoint.com/tools/QualityFramework/Documents/SCI\\_POL\\_%20Child%20Safeguarding%20Policy.pdf](https://savethechildren1.sharepoint.com/tools/QualityFramework/Documents/SCI_POL_%20Child%20Safeguarding%20Policy.pdf)

<sup>17</sup> **SCUS** Child Safeguarding Focal Points can be found at <https://savechildrenusa.sharepoint.com/lc/Pages/Child-Safeguarding-Focal-Point.aspx>

**SCI** Child Safeguarding Focal Points can be found on the left-hand menu at <https://savethechildren1.sharepoint.com/how/childsafeguarding/>

### B. Investigating and Follow-up of Child Safeguarding Allegations

SCUS takes every allegation of a violation of our Child Safeguarding Policy seriously. The National Director of Child Safeguarding is responsible to ensure all credible allegations are investigated, logged and tracked in the reporting database.

The National Director of Child Safeguarding or designee is accountable for conducting investigations, interviewing all involved SCUS personnel and making recommendations that will inform the necessary corrective actions and/or remedial measures.<sup>18</sup> During the investigation process, reasonable efforts should be made to contact the caretaker of the Child(ren) identified in the report or known to be put at risk of or actually harmed within our programs. Whenever possible, the Child(ren) should be interviewed and such interviews conducted by a skilled and trained child interviewer.

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, the reported concerns will remain confidential to the extent possible.

1. Initial Assessment: Upon receipt of a report, an initial screening will be conducted by the National Director of Child Safeguarding. A full account of the matter, any immediate personnel action and all documentation will be recorded in EthicsPoint/NavEx.
2. The designated personnel with investigative capacity will develop a Terms of Reference for the internal investigation and conduct it in accordance with the Investigation Workflow Process.
3. Reporting to Applicable Authorities: **In the US**, referrals must be made to Child Protective Services (CPS) or the police as soon as possible, but no later than 24 hours of the incident. Be advised that nearly all U.S. states impose penalties in the form of **fin**es or **imprisonment** for a **Mandated Reporter** who fails to timely report suspected or known child abuse, including physical, sexual and emotional abuse, neglect and/or maltreatment.

**If the incident happens abroad**, then it will be the responsibility of SCI to determine a path for investigation<sup>19</sup>, which may be done in partnership with SCUS. In addition, the relevant authorities in that location must be informed so that the appropriate response can be launched in accordance with local procedures. Irrespective of the local outcome or response, Save the Children staff must report (verbally and in writing) to a senior staff member at the organization/project where they are working or via the established reporting system.

<sup>18</sup> Corrective actions or remedial measures may involve Human Resources, who are responsible for using the facts from the investigation to determine any necessary personnel action. Child Safeguarding recommendations will also be made relative to training, coaching or program implementation issues (e.g., processes, procedures).

<sup>19</sup> See SCI's guidance on **Reporting, Response & Case Management Procedures and Investigation Procedures**. (Not yet posted to OneNet)

	<p><b>C. <u>Investigation in Exceptional Cases</u></b></p> <p>In cases where the allegations are likely to result in serious harm to a Child, reputational injury, or other exceptional cases (collectively, “Exceptional Cases”), the National Director of Child Safeguarding 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.</p> <p><b>D. <u>Documentation</u></b></p> <p>All individuals with documents pertaining to an investigation will ensure that such documents are preserved and have been provided to the lead internal investigator or National Director of Child Safeguarding for upload to EthicsPoint/NavEx.<sup>20</sup> Representatives must not forward <i>any</i> sensitive information to personal email accounts or add non-Save the Children email accounts to emails containing information about possible Child Safeguarding violations, Child Data or personnel information. Any documents shared with external parties or stakeholders must be approved by the General Counsel via the National Director of Child Safeguarding.</p> <p>All conversations pertaining to the investigation will be properly documented and provided to the lead internal investigator or National Director of Child Safeguarding.</p> <p>A final report will be completed for all incidents that have been investigated and uploaded to EthicsPoint/NavEx. Reports shall include the findings and Child Safeguarding recommendations (e.g., processes, procedures and/or personnel actions) for Human Resources review and determine corrective or personnel actions.</p>
<p><b>4</b></p>	<p><b><u>Training to Promote Awareness of Child Safeguarding Obligations</u></b></p> <p>All SCUS staff must undertake an initial training on the Child Safeguarding Policy within the first three months (90 days) after induction to SCUS and must take refresher trainings every two years.</p> <p>Head Start employees and other staff who are directly implementing programs are also required to take any state required Mandated Reporter training.</p> <p>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.</p> <p>Other required training will depend as it relates to job specific responsibilities.</p>
<p><b>5</b></p>	<p><b><u>Agreements with Partners</u></b></p> <p>All agreements with Partners must include the requirements of this Policy, including a provision in which the Partner agrees to comply with this Policy (subject to the Exception Approval Procedure contained herein).</p>

<sup>20</sup> Sensitive documents shall be sent with the label of “confidential” via the internal email system only. Whenever possible, documents should be password protected, and the recipient should receive the password in a separate email.

	<p>All partner agreements must include language about proper vetting of employees, including criminal background checks and sexual offender registry search, and ensure that any processes for “clearing” a discrepancy does not place any Child or vulnerable adult at risk of harm or injury.</p> <p>All Partners are responsible for reporting any suspected or known violations of this Policy as outlined above.</p> <p>All Partners will conduct a Risk Assessment to ensure programming is safe for children. Partners will ensure its staff members have been vetted via safe recruiting practices.</p> <p>Partners receiving funds from donors with relevant requirements must comply with those child safeguarding requirements.</p>
<b>6</b>	<p><b><u>Communications Materials (interviews, photography and filming)</u></b></p> <p>Any communications materials that include images of or information about children are subject to the Communications Guidelines attached as <b>Annex I</b> and included as part of this Policy.</p>
<b>7</b>	<p><b><u>Guests on Site, Program or Project Visits</u></b></p> <p>All Representatives of Save the Children on project visits involving children are subject to the Program Visit Child Safeguarding Guidelines attached as <b>Annex II</b> and included as part of this Policy. As a condition to the visit, all Representatives visiting projects involving Children in Save the Children programs are required to sign the Child Safeguarding Policy Acknowledgement attached as <b>Annex VI</b> prior to the visit. Once at the project, there shall be a <u>verbal briefing (Annex IV)</u> made to the guests regarding safe conduct.</p>
<b>8</b>	<p><b><u>Research and Monitoring, Evaluation, Assessment &amp; Learning (MEAL)</u></b></p> <p>All research and MEAL activities require an ethical review in accordance with the law, donor requirements and/or ethical standards. The review process will ensure compliance with this Policy.</p>
<b>9</b>	<p><b><u>Social Media and Child Safeguarding</u></b></p> <p>As a representative of SCUS, please be mindful when using your personal social media accounts. Remember, the Child Safeguarding Policy and Code of Conduct applies to your personal and professional lives, and all use of social media should be governed by the principles of respecting and protecting Children. To ensure that Children are safe and represented with dignity and care, the following guidance has been developed:</p> <ol style="list-style-type: none"> <li>a. <b>Sensitive, Confidential or Internal Communications about Children:</b> Discussing or sharing, via Public Communication<sup>21</sup>, any sensitive, confidential or internal matters concerning Children, their data or Child Safeguarding violations is strictly prohibited.</li> <li>b. <b>Use of Social Media:</b> It is not acceptable for Representatives to accept or make friend requests from/to any beneficiary who is a Child and/or has been or continues to be a recipient of services through Save the Children. Similarly, making contact with a Child’s caretaker or guardian for purposes of connecting with a Child for reasons unrelated to Save the Children is not allowed.</li> </ol>

<sup>21</sup> As defined by the Social Media Policy

Always exercise caution and professional judgment when communicating with an unknown social media request or a person you have reason to believe is under the age of 18.

- c. **Following Children via Social Media:** Where profiles are often public, you may want to follow a Child due to her/his public persona or relevancy to your work. This is acceptable as long as you have undertaken due diligence to ensure that this is appropriate and in alignment with this Policy and the Code of Conduct.
- d. **Communicating with Children:** If part or all of your work includes communicating with Children, this must be done via professional channels such as your work email address or an official social media account. Personal social media should never be used to conduct work activities, especially as it relates to communications with Children. If you have had an occasion to communicate with a Child through anything other than a Save the Children account, your line manager must be informed and alternative means of communication arranged.
- e. **Public Profile:** If your social media are in public settings, always remember that any content you generate can be viewed by anyone, including Children.
- f. **Child Beneficiary Sends a Social Media Request:** If a Child contacts you or sends a social media request to your personal account, consult with your line manager for guidance and direction on how to proceed.
- g. **Posts and Blogging:** If your social media or blogs are public and accessible to Children, specifically beneficiaries through Save the Children, you should be cautious with the information that you are sharing about yourself and loved ones, including images of your friends, family and Children (whether a beneficiary or not), and exercise caution and good judgment when posting pictures or videos of Children.

If your blog is public and content contained therein refers to work that is performed on behalf or because of your association with Save the Children, you are responsible for adhering to this Policy. Photos, video, artwork or stories of beneficiary Children that have not been obtained with proper consent and for purposes of Save the Children business cannot be used for personal accounts without permission from Media and Communications. After approval, any photo, video, artwork or story referring to Children in Save the Children programs must adhere to the Communications Guidelines in **Annex I** of this Policy.

The use of personal cell phones or other personal recording devices must not be used in Save the Children programming or operational spaces where children are present. Official Save the Children mobile devices or media equipment should be used for photography and/or filming.

If you see any inappropriate or indecent content, communication, images or video of Children online, please report this immediately to the social media's reporting system. If you believe that any inappropriate or indecent content is connected to or implies a connection to Save the

	<p>Children, you must immediately report this to your direct manager or National Director of Child Safeguarding within one (1) business day.</p> <p>All Representatives are required to report any suspected or known social media violations in the same manner as any other Child Safeguarding Policy violation. You are not expected to provide evidence or proof but any that you may have should be included in your report. You are not to investigate the concern; however, you may take whatever action is necessary to ensure the safety of Children involved.</p>
<b>10</b>	<p><b><u>Child Data</u></b></p> <p>All Representatives are expected to comply with the processes for collecting, storing, transmitting and destroying Child Data or PII. Information about Child Data Protection and PII can be found on the Child Safeguarding SaveNet page.</p>
<b>11</b>	<p><b><u>Children with Different Abilities or Disabilities</u></b></p> <p>Children with different abilities or disabilities are at an increased risk of abuse. Where children with special needs benefit from our programs, we must make all necessary accommodations to ensure their inclusion and safety. To promote the best delivery of services to children with different abilities or disabilities, please:</p> <ul style="list-style-type: none"> <li>• Consult with the child to better understand his/her needs.</li> <li>• Consult with parents/caretakers to better understand the needs of the child, as well as any limitations to activities offered.</li> <li>• Be aware of attitudes that the child, his/her family, the community and other children in the program/activity may have towards the child with special needs and encourage inclusion and participation to the full extent possible.</li> </ul> <p>Programs and activities shall be designed to be inclusive and mindful of children with unique or special needs. For children whose different abilities or disabilities may not be visible or patent, staff shall make reasonable efforts to adjust program activities to promote inclusion and offer alternative activities in which all children can join. The validity of a special need must never be questioned or dismissed.</p>
<b>12</b>	<p><b><u>Child Participation and Inclusion</u></b></p> <p>To promote the safety, inclusion and equitable participation of all children irrespective of their abilities, racial heritage, tribal affiliations, religious beliefs, languages, gender or gender association, LGBTI+ identity and/or medical/physical conditions, all programs and activities shall be assessed to ensure consideration of such factors from its inception through delivery. The aforementioned factors are not an exhaustive list. These aspects must be included in the Monitoring and Evaluation frameworks for such activities.</p>
<b>13</b>	<p><b><u>Budgeting</u></b></p> <p>The cost of implementing the standards associated with this Child Safeguarding Policy must be reflected in all operational plans, budgets and funding proposals.</p>

## TRAINING REQUIREMENTS

Training Course	Frequency	Training moment
Child Safeguarding Policy Foundations Training	Upon induction, and then every two years	Within 45 days of induction

## MONITORING MECHANISMS

What are you monitoring?	Data source	Action Owner	Escalation levels	Frequency
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 Vice President & General Counsel	Person seeking exception to policy
File and retain exception approval	Vice President & General Counsel

## VERSION CONTROL

Version number	Version Date	Revisions made
CS-01.5	February 1, 2019	Revision of existing Child Safeguarding Policy
CS-01.4	April 12, 2017	Updated Format
CS-01.3	July 25, 2016	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. 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 youth have all the rights of adults. In addition, they have the right to be protected from harm. Reporting on children and youth 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

- 1) 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; and/or
  - 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 the child's guardian for all interviews, videotaping and, when possible, documentary photographs. When possible and appropriate, this permission should be in writing. Permission must be obtained under 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 a child is comfortable and able to tell her/his 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, her/his life and the story. Ensure that the child will not be endangered or adversely affected by showing her/his home, community or general whereabouts.
- 7) If a child discloses bad practice during an interview (such as abuse, criminal activity or a violation of any 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 forms of compensation are to be provided to children or parents in exchange for their interview, photo or consent.

#### **Guidelines for Reporting on Children (Including Solicitation Materials)**

- 1) Do not further stigmatize any child. Avoid categorizations or descriptions that expose a child 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; or
  - f) 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, refugee or internally displaced person; and/or
  - b) Orphaned, abandoned or separated from parents/guardians.<sup>22</sup>
  
- 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 interest; however, when a child's identity is used, s/he 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 her/his right to freedom of expression and to have her/his 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 her/his name and identity as a part of healthy development; and/or
  - 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 used. 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 or 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

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<sup>22</sup> In the case of orphans, please be sure to mention when they are in the care of relatives or guardians.

- **Clarity:** Please take clear photos and videos, test sound quality and write conversationally while remaining grammatically 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 (e.g., 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 Indicator - Protection:

- **Coverage/Clothing:** Children must not be photographed, filmed or otherwise pictorially represented in any state of undress. Genitalia and breasts must not be exposed with very strict discretion around shirtless children to ensure the child's image does not serve as fodder for pedophiles or potential wrongdoers.
- **Dignity:** Does the image, video or story present the child in a state or quality of being worthy of honor or respect? Is the subject portrayed as a helpless victim or as a brave survivor 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, etc.).
- **Releases:** Releases are required, and may be obtained verbally in case of emergencies. Releases include informing the child and her/his guardian *in their preferred language* of the intended use of the photo, film or story 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 SAFEGUARDING GUIDELINES

#### Standards & Procedures for Child Safeguarding and Site Visits:

I.1 Uphold the agency Child Safeguarding Policy standards through background checks, policy review, signed policy acknowledgements, verbal briefings, and general application to all Save the Children site visitors. Examples of visitors include staff, interns, consultants, volunteers, vendors, policymakers, talent, corporate or foundation partners, board members, etc.

##### Procedure before Site Visit:

- Prior to any contact with children, the Save the Children organizer of the site visit will provide expectations for site visits to the visitor(s).
- The organizer of the site visit will provide a copy of Save the Children's Child Safeguarding Policy (CSP) to the site visitor(s) prior to visit. Save the Children visitor(s) must review the policy and return a signed CSP acknowledgement to the organizer of the site visit.
- The organizer will scan and send the forms to [CSQuestions@savechildren.org](mailto:CSQuestions@savechildren.org).
- Signed copies of CSP acknowledgements, per standard SC policies and practice, will be retained in the CS Policy Library on SaveNet.
- If a visitor participates in multiple visits, s/he only needs to sign a policy acknowledgement every two years.
- In some cases, staff at sites will have additional Child Safeguarding or Ethics Conduct forms for visitor(s) to review and sign.

I.2 Adhere to the Two-Adult Rule and Supervision Guidelines, as Outlined in the Child Safeguarding Policy.

##### Procedure during Site Visit:

- 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.
- Children must **never** be left alone with any visitor(s). (See **Annex III**)

I.3 Provide a Verbal Briefing for All Site Visitors.

##### Procedure during Site Visit:

- Prior to or at the onset of the site visit, all visitors shall receive a verbal briefing to foster compliance with expected behaviors as outlined in this Policy. (See **Annex IV**)

I.4 Protect the Privacy and Sensitive Personally Identifiable Information (PII) of Children and Families.

##### Procedure before Site Visit:

- Site staff must explain the Consent for Photos, Videos, Original Artwork and/or Interviews to all participants of the upcoming site visit, including all caretakers, guardians and parents of children at the site. If an authorized adult or guardian/caretaker of a child has not signed the consent prior to the visit, the child cannot be included in photographs, video, quotes or other materials intended for publication, marketing or other business use. Copies of the consent forms should be filed at the site as per standard SC policies and practices. (See Procedure 8: Social Media and Child Safeguarding)

#### During Site Visit:

- Please follow Save the Children’s safeguarding guidelines for social media and communications.

#### After Site Visit:

- Please follow SC’s child safeguarding guidelines for social media and communications.

1.5 Ensure all site visits are authorized, and visit procedures are followed.

#### Procedure:

##### Before Program, Site &/or Sponsorship Visits:

- All visitors must completed a background record check (BRC) in advance of the visit. (See Procedure 1(C)(ii))
- The BRC is valid for two (2) years. The BRC must be completed and cleared before the visit.
- Exceptions to the BRC process may only be granted by the General Counsel.
- Prior to domestic (US) and international program visits, parent/guardian consent forms must be signed in the parent’s/guardian’s preferred language prior to any photography or filming of Children in the programs, and use of photos or films must adhere to the guidance provided in this policy.

##### Additional Guidance for Sponsorship Visits:

- Prior to domestic (US) and international sponsored child visits, parent/guardian consent forms must be signed in their preferred language prior to any photography or filming of Children in the programs, and use of photos or films must adhere to the guidance provided in this policy.
- Program or Country Office visits that do not involve contact with the sponsored child do not require parental consent forms to be completed. (For example, if a sponsor is not able to visit her/his sponsored child but will generally be visiting a program with other children.)
- Prior to sponsorship visits, both domestically and internationally, please:
  - Confirm the child’s eligibility in sponsorship programming;
  - Obtain written consent from the child’s parent/guardian prior to the visit between the child and sponsor;

- Ensure that field staff has spoken to the child about his/her comfort with the visit; and
- Request the sponsor send the child a letter prior to the upcoming visit.

#### During Site Visit:

- If a visitor unexpectedly arrives at a program office or site requesting a site visit, staff should explain that a visit cannot take place because the proper forms and BRCs have not been completed. Staff should then contact the Child Safeguarding Focal Point (CSFP). 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 (2) 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).

## ANNEX III

### PROGRAM/SITE VISIT SUPERVISION GUIDELINES

Save the Children is responsible for the safety of all children. As part of the Child Safeguarding Policy, staff, representatives and partners have agreed to ensure that children are safe in our care. To ensure that children are properly supervised at all times, please refer to this guidance document to help direct the necessary practices and procedures within your program or activity.

#### Supervising Children

There is no exhaustive list for identifying all the ways to actively supervise children. There may be additional strategies that you know. There are, however, two basic practices that remain true for all site and program operations:

- a. Children must never be left alone. There must always be a minimum of two staff persons (e.g., the Two-Adult Rule) at all Save the Children events and programmatic spaces.
- b. Children must never be unattended<sup>23</sup>. Staff within programmatic spaces or at events must ensure that children are always visible and within earshot of a paid staff person.

For events and programs, the following considerations should be made prior to the onset of the event or program:

1. Develop an active supervision plan.
2. Set up the environment to ensure active supervision of children at all times.
3. Establish a clear procedure for signing children in and out of the program or event.
4. Consider adding temporary or permanent (based upon the program or event site) bells or chimes to any doors through which children could exit.
5. Identify an adequate ratio of staff to provide supervision to children.
6. Place staff throughout the space so that all children can be seen and heard.
7. Create clear paths where children are playing, sleeping or eating in case a quick response is needed.
8. Establish clear physical boundaries for outside spaces in which children will be playing.
9. Count children periodically throughout the day to ensure the correct number of children are present. This is especially critical during times of transition (e.g., bathrooms, cafeteria, outdoors, etc.).
10. Maintain an accurate attendance list of children.
11. Review rules of the space with children.
12. Identify a specific location for drop-off and pick-up at the program or event.
13. Anticipate children's behaviors and proactively develop a plan to mitigate risks.

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<sup>23</sup> The difference between alone and unattended: Alone is when there is not adult supervision present. Unattended is when an adult may physically be present but is not actively supervising and does not view of a child.

## Supervising **Visitors**

Save the Children visitors, including parents of children in programs or at events, shall:

1. Never be left alone or unattended with children in program spaces or events. The parents of children in our programs or at events must never be left to care for or supervise a child who is not theirs.
2. Always be accompanied by a Save the Children staff member.
3. Never speak with children without a staff member present.
4. Always be vetted prior to the visit (e.g., complete background record check, sign CS acknowledgement form and receive a verbal briefing).

Please take care to ensure that visitors are always in the company of a staff person throughout their visit. Staff persons and visitors should be mindful of rules regarding the use of bathroom areas, as some areas are designated only for the use of children (e.g., Head Start programs).

Save the Children staff and partners must intervene if there are any indicators that a visitor *may or has actually* harmed a child, either through physical/sexual contact or verbally. Interventions must be done safely to ensure the protection of the child(ren) as well as staff.

## ANNEX IV

### SITE VISIT VERBAL BRIEFINGS

#### Child Safeguarding Verbal Briefing Script

For SCUS Staff: This script is intended for all individuals visiting Save the Children USPA programs, including Head Start every day and in times of crisis. All visitors must complete a Background Record Check (BRC) and sign a Child Safeguarding Policy acknowledgement form prior to visiting with children or having access to data.<sup>24</sup> The Team Leader/host is responsible to ensure that the Child Safeguarding Acknowledgement forms or sheet for USPA & Head Start has been completed and emailed to [CSQuestions@savechildren.org](mailto:CSQuestions@savechildren.org). All documents may be found on SaveNet.

No individual is allowed to visit with children if his/her presentation is indicative of any substance use<sup>25</sup> or otherwise presents as erratic or unsafe.

Script: Save the Children is committed to keeping children in our programs safe. Anyone under the age of 18 is a child. Our top priority is to ensure the safety of children in all that we do, and we have **zero tolerance** for Child Abuse and Exploitation. Here are some of the things you need to know during your program visit:

1. During this visit, it is the responsibility of Save the Children staff to accompany you (the visitor/s) throughout your program visit. Our duty to protect children means that we must actively supervise any contact between you and the children in our programs, including conversations.<sup>26</sup>
2. Please take care to treat all children with dignity and respect.
3. We do not tolerate any form of child abuse - inadvertent or deliberate - including inappropriate physical contact of a violent or sexual nature, verbal aggression, and/or emotional maltreatment.
4. Please do not provide money or anything of value to a child.
5. Please do not help children do things of a personal nature that they can do for themselves (e.g., dressing, toileting, washing, etc.).
6. Exchanging contact information with children is not allowed. This includes phone, email, social media, instant messaging, or any other method of communication.
7. Please do not ask children to share any personal information about themselves (e.g., last names, addresses, school location, etc.).
8. The use of personal mobile phones or devices to photograph or record children is not allowed in our operational or programming spaces during your visit unless our Media and Communications team has approved it. Save the Children has specific guidelines that we must

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<sup>24</sup> Parents volunteering at their child's Head Start program are not required to complete BRCs. Parents will need to sign the CS policy acknowledgement sheet unless they have already signed and returned the formal acknowledgement form.

<sup>25</sup> Slurred speech, odor of alcohol emanating from person or breath, bloodshot eyes, unsteady on feet, incoherent speech, erratic behavior, boisterous without awareness of it, dilated pupils.

<sup>26</sup> A chaperone must be made aware of his/her commitment to actively supervise children in their care.

follow with respect to legal consent, use of location and identifiable information, *geotracking* and/or names of children in the photo description.

9. While on this program visit, we ask that you immediately inform a staff member of any concern that you may witness.
10. If you have questions about our Child Safeguarding policies or behaviors that are deemed to be harmful to children, please let the team leader/host know.

If we observe any concerns during the visit, it is our responsibility to intervene to ensure the safety and protection of the child. You can also refer to the visitors' pamphlet for a condensed version of our Child Safeguarding Policy.

## ANNEX V

### HEAD START PROGRAMS

All staff, representative and guests in the Head Start programs are governed by this Child Safeguarding Policy. There are, however, additional considerations unique to Head Start that require special attention.

#### A. Ratio

All Head Start programs are required to ensure proper ratio of staff in the classrooms. This is strictly mandated by Head Start, and all programs are required to conform with such regulations.

This policy encourages the use of the Two-Adult Rule at all times to: (1) Reduce the risk of an incident of abuse. Abusive behavior tends not to happen when there is a witness; (2) Protect against false accusations; (3) Reduce liability and a possible claim of negligence; and (4) Offer additional help if there is an accident or emergency.

#### B. Counting Children

It is important that throughout the day, Head Start staff **Scan and Count** all of the children in the program/center. The ECKLC website has a lot of great resources to provide guidance on Active Supervision and Counting Kids. No child should ever be left alone or unattended. (NOTE: The difference between alone and unattended. Alone is when there is not adult supervision present. Unattended is when an adult may physically be present but is not actively supervising and does not view of a child.)

A protocol for Counting Kids means that:

- Staff are always able to account for the children in their care.
- They continuously scan the entire environment to know where everyone is and what they are doing.
- They count the children frequently.
- They are especially vigilant during transitions (i.e., when children are moving from one location to another).

All Head Start programs shall develop written procedures to ensure the proper accounting of children throughout the school day. This includes but is not limited to:

- I. Developing a Counting Kids process for each center within the program.
  - a. How are children counted (e.g., by name, placing hand on the head, asking children to count off, buddy system, etc.)?
  - b. Who is accountable to ensure children are counted?
  - c. How does the center/program respond if a child is “missing” after a count is completed?
  - d. How frequently are children counted?
  - e. How is counting captured (e.g., documentation)?

2. Ensuring proper ratio of staff during transitions (e.g., bathroom, playground, cafeteria, etc.), which are the most vulnerable times in which children are not counted.
3. Identifying a person in each center to monitor the process and ensure consistent compliance.

### **C. Dismissal**

All Head Start programs shall develop written procedures to ensure safe and consistent dismissal practices. This includes but is not limited to:

1. Processes to sign children in and out of the center/program.
2. Identifying authorized adults and maintaining an updated list of authorized adults.
3. A no-show parent/caretaker procedure.
4. A protocol for when a parent/caretaker appears impaired or is otherwise unable to care for the child.
5. A procedure for when an unauthorized adult comes to pick up a child.
6. Children may **ONLY** be released to authorized adults *currently* on the contact list. Parents and caretakers may not call, text or email requests to add individuals to pick-up children. Additional authorized adults may only be added in person and by the legal custodian/guardian of the child.

### **D. Transportation**

All Head Start programs offering transportation to children shall develop written procedures to ensure safe transportation of all children. This includes but is not limited to:

1. Maintaining a current roster of children identified to ride the bus, which includes pick-up and drop-off location, as well as an authorized adult to receive the children upon drop-off.
2. On-boarding and off-boarding children from the bus.
3. Safely securing children into seats via belts or harnesses.
4. Implementing Redundant or (Fail-Safe) Safety Systems, in accordance with the ECLKC standards for when children are off-boarded.
5. A bus monitoring system to ensure that processes are practiced consistently.
6. A no-show parent/caretaker procedure.
7. An accident or bus break-down protocol.

## ANNEX VI

### CHILD SAFEGUARDING ACKNOWLEDGEMENT

I acknowledge that I have been provided with and have reviewed Save the Children US's Policy on Child Safeguarding with the effective date of July 1, 2018 (the "Policy"). **I agree to comply with all aspects of the Policy, and I understand that my ongoing compliance with the Policy is a condition required for my participation in any visits to Save the Children program sites or any other Save the Children related activities.**

This Child Safeguarding Acknowledgement shall have effect for a period of two (2) years from the date on which it has been signed as indicated below.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Site Visit Location: \_\_\_\_\_

Date: \_\_\_\_\_

**ANNEX VII**

**BRC VERIFICATION**

On the employer, company, corporation or entity's **letterhead**, please copy and paste the following:

**Verification of Completed Background Record Check (BRC)**

Date: \_\_\_\_\_

Employer: \_\_\_\_\_

Employee's Name: \_\_\_\_\_

Please check the following that apply:

(a) A comprehensive BRC for criminal and sexual offender histories has been conducted

(b) There is no history of a criminal or sexual nature

(c) There are no known concerns indicating that the individual would pose a risk to children or vulnerable adults

(d) Date of last BRC \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

\_\_\_\_\_  
Printed Name of Supervisor/Manager or Human Resources Rep

\_\_\_\_\_  
Signature of Supervisor/Manager or Human Resources Representative