



SAFEGUARDING PROCEDURE

Approved,
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PROCEDURE NAME	Safeguarding Procedure	PROCEDURE #	PRO-PRO-080
APPLIES TO / SCOPE	All ChildFund International [Country Offices (CO), Fundraising Offices (FRO), and International Office (IO)]	POLICY OWNER	Global Operations
SUPERSEDES	PROCEDURE GHR-PRO-080 December 5, 2019	APPROVAL DATE	June 13, 2023
APPROVAL BY	ChildFund International Executive Team	EFFECTIVE DATE:	July 1, 2023
NEXT REVIEW DATE	June 30, 2026	RELATED PROCEDURES	Safeguarding Policy

1. Purpose

ChildFund International (“ChildFund”) recognizes that safeguarding particularly sexual exploitation and abuse is an organizational risk which if not prevented would represent a catastrophic failure of protection and may bring harm to those we are mandated to protect, result in organizational reputational damage, impact on our operational viability, and lead to loss of funding and trust. The safeguarding policy and procedure provide guidance to ChildFund staff and representatives to implement viable measures and actions spanning all organizational activities to prevent, detect, report, and respond appropriately to sexual exploitation and abuse, neglect, and all forms of harm, violence, or misconduct that could occur to program participants (children, young people, and adults) through the actions or inactions of ChildFund staff, representatives, programs, and operations. ChildFund has a duty of care, to Do No Harm, build a safe, and trusted environment that promotes the rights, welfare, and best interests of those it works with directly or indirectly; and those under the care of the organizations we partner with.

The policy also reinforces ChildFund’s commitment (the CEO Pledge) made as a member of InterAction on Protection from Sexual Exploitation and Abuse (“PSEA”) by and of NGO staff to practices and policies that will not only protect our own staff, but also the communities we serve and documents ChildFund’s commitment to uphold the Inter-Agency Standing Committee’s six core principles¹ relating to Prevention of Sexual Exploitation and Abuse which are critical to our work.

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- ¹ “Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
 - Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
 - Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
 - Any sexual relationship between those providing humanitarian assistance and protection and a person benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
 - Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
 - Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.”

2. Scope

- 2.1. Adherence to the ChildFund International Safeguarding policy is mandatory for:
 - 2.1.1. All ChildFund staff contracted permanently, or temporarily,
 - 2.1.2. Representatives whilst engaged with work or visits to ChildFund, including but not limited to board members, partners, consultants, vendors, interns, volunteers, program visitors, journalists, and all other representatives acting for and on behalf of ChildFund in any capacity.
- 2.2. All must read, understand, and commit to adhere to ChildFund's safeguarding policy and procedures. Implementing Partners may have agreements with Country Offices such as the Letters of Agreement signed by Local Partners, which require them to maintain and adhere to their own Safeguarding Policy which is at least as stringent as ChildFund's.
- 2.3. This Policy is focused on protecting all program participants including children, young people/youth, and vulnerable adults anywhere ChildFund works from harm that may result from them coming into contact with ChildFund staff and representatives directly or indirectly.
- 2.4. The Policy equally applies to ChildFund programs and operations in the development and humanitarian context.

3. Policy Statement.

- 3.1. ChildFund has **zero-tolerance for sexual exploitation and abuse**, neglect, and all forms of harm, violence, or misconduct to program participants (children, young people, and vulnerable adults) by its staff or representatives. ChildFund believes that everyone we come into contact with, regardless of age, gender, disability, sexual orientation, or ethnic origin has the right to be protected from all forms of harm, abuse, neglect, and exploitation.
- 3.2. This overarching policy and procedure document our safeguarding framework for the prevention, detection, reporting and response to safeguarding concerns and incidents by staff and representatives, contextualized to each office and country where we work.
- 3.3. ChildFund's has a responsibility to provide a safe and trusted environment for those affected or at risk of harm, offer protection and support to survivors, as well as whistleblowers and/or witnesses; and commits to taking appropriate measures against any form of retaliation.
- 3.4. ChildFund commits to have ongoing training for staff, representatives, and program participants to understand the standards of behavior expected of them and from them; learn to recognize and respond to concerns of sexual exploitation and abuse, and other forms of harm towards children, young people, vulnerable adults, staff, and representatives.
- 3.5. All ChildFund partners are supported to develop and equally implement comprehensive safeguarding policies and procedures consistent with ChildFund's for the effective prevention, detection, reporting and response to safeguarding concerns and incidents.

4. Safeguarding Principles

- 4.1. ChildFund is committed to upholding the six core principles of safeguarding. The principles are critical to ChildFund's work and actions for the prevention of sexual exploitation and abuse and other harms to program participants, while also ensuring the best possible level of care and support is provided to survivors of abuse.
- 4.2. The safeguarding policy and procedure are aligned with our core values, global standards, commitment to the CEOs Pledge to protect the communities we serve by preventing sexual exploitation, abuse, and all other forms of harm/violence. In following the underlined

safeguarding principles while implementing this policy and the ChildFund Safeguarding Behavior Protocol (“Behavior Protocol”), we can be certain that we are doing the best to make sure our staff, partners, programs, and operations do not harm vulnerable people:

- 4.2.1. Empowerment:** To empower ChildFund program participants and the communities we serve, and all representatives by encouraging effective participation in decision-making processes for prevention, detection, reporting, and response to harm/abuse.
- 4.2.2. Prevention:** prioritizing prevention of harm from occurring over waiting to respond after harm has occurred.
- 4.2.3. Proportionality:** ChildFund shall respond to all safeguarding risks in a proportional, context appropriate, and ideally unintrusive manner
- 4.2.4. Protection:** Ensuring everyone has the knowledge and training required to protect vulnerable program participants from harm.
- 4.2.5. Partnership:** ChildFund will partner with other organizations and communities to support vulnerable people, and communities and ensure survivors have access to professional services.
- 4.2.6. Accountability:** It is ChildFund’s responsibility to make sure all staff and representatives understand their roles around safeguarding, being accountable, and transparent to one another and especially to program participants and communities we work with to address safeguarding concerns and incidents.

5. Safeguarding Procedures

5.1. Prevention Of Safeguarding Concerns

5.1.1. Dissemination of the Safeguarding Policy:

- 5.1.1.1.** The Safeguarding Policy and procedure are to be reviewed/updated every three years and approved by the Executive Team.
- 5.1.1.2.** ChildFund staff and representatives are trained on the policy and procedure and are confident and competent to proactively reference and put into practice and have signed commitment to comply with the policy.
- 5.1.1.3.** All staff and representatives know how to prevent, detect, report, and respond to breaches of the Safeguarding Policy.
- 5.1.1.4.** Child and youth-friendly safeguarding information materials, such as posters that include appropriate standards of behavior and how to report concerns, are made available to program participants, and communities; and are prominently displayed in offices, program/project sites and official websites.

5.1.2. Adaptation of the Safeguarding policy to context.

- 5.1.2.1.** Country Offices will document in a Country Office addendum to this policy, any exceptions to the policy that are needed to comply with local laws and contexts and will periodically review and update the addendum as those laws change. The Global Safeguarding Advisor will approve Country Office addendums upon development and updating.
- 5.1.2.2.** The adapted policy addendum to be reviewed and approved for consistency with the safeguarding standards outlined in this document and should be in accordance with local laws, and context. Country Offices may set stricter requirements as required by national laws or context.
- 5.1.2.3.** The Country Office and Local Partner Organizations in respective contexts coordinate in any national contextualization efforts.

5.1.3. ChildFund Safeguarding Behavior Protocol:

- 5.1.3.1.** When working with program participants, ChildFund staff and representatives are in a position of power and have a responsibility to always adhere to the highest standards of behavior to prevent harm.
- 5.1.3.2.** ChildFund has set clear expectations or standards of behavior for staff, and representatives, to ensure that personal and professional conduct is always of the highest standard. The standards are informed by the Inter-Agency Standing Committee's core principles relating to PSEA and they lay out the expected and unexpected standards of behavior to be adhered to by all staff, and representatives.
- 5.1.3.3.** The Behavior Protocol guides all ChildFund staff, representatives, and program participants on what constitutes acceptable behavior towards children, young people, and vulnerable adults; and what would constitute unacceptable, abusive, or risky behavior. The Behavior Protocol (below) is an attachment to this document within section 7 (ANNEXTURES).
- 5.1.3.4.** The Behavior Protocol shall be cascaded to partners, prominently displayed, and shared with program participants and communities, to know the expected standard of behavior of staff and representatives who come into contact with program participants.
- 5.1.3.5.** The Behavior Protocol shall be used in conjunction with this policy and other complimentary policies and procedures including ChildFund's Code of Business Conduct and Ethics.
- 5.1.3.6.** Any employee who has knowledge of any inappropriate behavior that breaches the ChildFund Behavior Protocol is obliged to report to the Safeguarding Focal Point within 24 hours of notice.
- 5.1.3.7.** ChildFund Country Offices will adapt the Safeguarding Behavior Protocol (Below) for all staff and representatives and ensure they read, understand it, and agree to comply with the Protocol by signing off appropriately together with the policy and procedure in WeConnect.

CHILDFUND SAFEGUARDING BEHAVIOR PROTOCOL

CHILDFUND SAFEGUARDING BEHAVIOR PROTOCOL Staff and Representatives' Responsibilities to Program Participants	
Child Safeguarding	Adult Safeguarding
I understand that ChildFund Staff and Representatives MUST NOT	
- Engage in sexual activity with anyone under the age of 18. Mistaken belief in the age of the child is not a defense. - Sexually abuse or exploit children or young people or act in ways that may be perceived to be abusive, exploitative, harmful, or grooming behavior. - Subject a child or young person to physical, sexual, emotional, or psychological abuse, or neglect. - Engage in any commercially exploitative activities with children or young people including child labor or trafficking.	- Sexually abuse or exploit vulnerable adults. - Subject vulnerable adults to physical, emotional, psychological, sexual, or financial abuse, or neglect, bullying, discrimination
UNACCEPTABLE BEHAVIOR/CONDUCT FOR CHILDFUND PEOPLE	
As a ChildFund Staff and Representative, I MUST NEVER	
- Exchange money, employment, goods, or services for sexual activity. This includes any exchange of assistance that is due to program participants. - Engage in any inappropriate sexual relationships or conduct with program participants, since they are based on inherently unequal power dynamics. - Make inappropriate promises to program participants, especially children in relation to confidentiality which has implications for their safety or the safety of others. - Have a sexual or romantic relationship with a program participant or indulge in any form of sexual contact with a program participant. This is not acceptable under any circumstances. - Engage in behavior that constitutes any form of abuse, exploitation, neglect, discrimination, harassment, or violence. - Emotionally abuse another person by engaging in behavior intended to shame, humiliate, belittle, or degrade. - Use any form of technology or social media to abuse, exploit, harass, or distribute indecent images or harmful materials about program participants. - Condone or participate in behavior towards children which is illegal, unsafe, harmful, or abusive in any way or condone or participate in any child-related activity, which is illegal, exploitative, unsafe, or abusive. - Use physical punishment or discipline towards children (e.g., hitting, corporal punishment) - Communicate with a child via digital platforms (e.g., Facebook, Twitter, Instagram), mobile technology (WhatsApp, Skype, texting) or online without consent and knowledge of his/her parents or caregiver. - Abuse your position of power to withhold professional assistance or give preferential treatment to a program participant or behave in any way that discriminates. - Allow incidents or allegations of abuse or misconduct to go unreported.	
ACCEPTABLE BEHAVIOR/CONDUCT FOR CHILDFUND PEOPLE:	
- Adhere to the guidance provided in ChildFund's safeguarding policy and procedures. - Follow the 'two-adult' rule while conducting activities that involve children ensuring that two or more adults supervise all activities and are always visible and present. - Always be respectful, open, and honest in my interactions with program participants, and take their contributions and concerns seriously. - Be exemplary, model good behavior that I would wish for program participants to follow. - Respect boundaries and ensure that my contact with program participants is strictly in keeping with my professional role and responsibilities. - Take special caution when discussing sensitive matters concerning program participants and seek advice from a ChildFund designated safeguarding Focal Point when in doubt or in need of guidance in each context or situation. - Keep children and young people participating in all our activities safe through appropriate oversight/ supervision and by using methods, equipment, and techniques that prioritize their safety and welfare. - Behave appropriately online in accordance with ChildFund's guidelines on safe and ethical communication and the use of social media and digital technology. - Promptly report any safeguarding concerns, suspicions, or allegations to ChildFund through the established reporting mechanisms and the appropriate Safeguarding Focal Point.	

ChildFund Staff and Representatives are Obligated To:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy and procedures.
- Mandatory Report any safeguarding concern or suspicion regarding safeguarding violations by a ChildFund staff, representative, or a HUMANITARIAN AID WORKER from any agency, or any observed breach of the safeguarding policy and procedures including this behavior protocol to the Safeguarding Focal Point, Manager, or through established reporting mechanisms with 24 hours of notice.

Breach of the Safeguarding policy and behavior protocol

ChildFund has zero-tolerance for sexual exploitation and abuse, neglect, and all forms of harm, violence, or misconduct to program participants. Individuals who breach this safeguarding policy and behavior protocol may be subjected to ChildFund's disciplinary procedures leading up to termination. A serious breach may result in summary dismissal and/or referrals for criminal incidents being made to the police and/or relevant authorities.

5.1.4. Risk Assessments

- 5.1.4.1.** Risk assessments and management are considered foundational to ChildFund safeguarding practices - to understand when, where and how our mission interacts with program participants.
- 5.1.4.2.** ChildFund prioritizes continuous organizational capacity-assessments to check for compliance to safeguarding policy standards and procedures implementation as a best practice towards a safer organization.
- 5.1.4.3.** ChildFund shall undertake regular risk assessments including the risk of SEA in key aspects of its programs, operations, and specific activities to understand and document the potential safeguarding risks²; develop, and implement adequate mitigation plans to treat and mitigate any identified risk of harm.
- 5.1.4.4.** Identified risks to be documented, action plans and risk registers resulting from the risk assessments developed, implemented, tracked, and continuously reviewed for improvements.
- 5.1.4.5.** Senior leadership shall be updated periodically and have visibility of risk management.

5.1.5. Safe Recruitment and Selection

ChildFund is committed to safe recruitment and selection practices (per attached checklist) of staff and representatives to address and manage the safeguarding risks including PSEA in accordance with applicable laws and regulations. In all recruitment and selection processes, ChildFund will diligently take appropriate steps to systematically vet and screen all personnel (employees and representatives) in accordance with local laws including checking for prior involvement in SEA or other safeguarding concerns. Unsuitable individuals who are not of good character and conduct and might harm program participants shall not be onboarded as employees or representatives.

- 5.1.5.1.** ChildFund Global Human Resource to have in place guidelines/procedure on safe recruitment & selection of staff to ensure that the suitability of potential staff and representatives who are to be thoroughly screened, vetted and identified risks managed.
- 5.1.5.2.** The Safeguarding Policy and Behavior Protocol are part of all ChildFund recruitment, selection, onboarding, and performance management processes.

² A safeguarding risk is the possibility that a child or vulnerable adult could be harmed by personnel, programs, partners, or operations. This harm could include, sexual exploitation and abuse, violence, emotional harm or neglect among others.

- 5.1.5.3. Job descriptions:** Before advertising, the hiring manager shall assess all jobs or vacancies for the level of contact the role is to have with program participants and/or their personal data. All job descriptions/terms of references to include a statement on the position's safeguarding obligations and duty of care to program participants.
- 5.1.5.4. Job Advertisements:** All job advertisements shall include a statement of commitment to zero tolerance to sexual exploitation and abuse and all forms of harm and the organization's values to deter potential perpetrators.
- 5.1.5.5. Application forms:** All applicants are required to send an application form and CV, and these are assessed against the minimum safeguarding requirements of the role when shortlisting.
- 5.1.5.6. Interview process/techniques:** During the job interviews, a set of mandatory behavioral questions related to safeguarding including PSEA will be administered. Any gaps in employment history will be checked during the interviews.
- 5.1.5.7. Reference checks:** Prior to making a formal offer of employment, a minimum of two documented references are taken from previous employers which include questions on the candidate's conduct in relation to safeguarding/PSEA. In addition, to include a documented self-disclosure from an applicant.
- 5.1.5.8. Background Checks:** A criminal police background check prior to employment or placement is mandatory. Where national criminal background checks are not available or possible, an approved exemption for alternative checks will be undertaken as an addendum to the policy.
- 5.1.5.9. Identity Checks:** Candidates shall have an identification check. Qualifications are checked, and photographic identification is provided to confirm identity for roles working directly with program participants and/or their personal data.
- 5.1.5.10. Contracting:** New employees sign contracts which include safeguarding clauses and the organization's behavior protocol, and provisions for the suspension of a staff while under investigation and to dismiss staff if allegations are substantiated.
- 5.1.5.11. Onboarding/ Induction:** All new staff and representatives are required to receive, read, and acknowledge by signing the ChildFund Safeguarding Policy and behavior protocol and to receive at least an hours orientation on the policy and behavioral protocol by the Focal Point.
- 5.1.5.12. Performance Planning and Evaluation:** All staff's Performance Planning and Evaluations include a review of performance against safeguarding requirements for the role.
- 5.1.5.13. Representatives:** Recruitment and selection procedures outlined in the checklist shall be adapted to the selection processes for ChildFund representatives.
- 5.1.5.14. Disclosure of abusive record:** Recruitment policies and employment contracts shall include a provision allowing ChildFund, in case an employee is discharged for sexual exploitation, abuse, child maltreatment or other safeguarding concern, to disclose such information if requested by a prospective employer, and/or the authorities.
- 5.1.5.15. Breach of the safeguarding policy,** any breach of the safeguarding standards and protocols by any staff or representative shall result in disciplinary action leading up to termination in line with the terms of the contract, or letter of agreement.

5.1.6. Awareness raising

- 5.1.6.1.** ChildFund will disseminate and promote the safeguarding policy and Behavior Protocol to staff, and representatives, either in hard copy or electronically.
- 5.1.6.2.** Orientation, regular briefings, and training will be delivered to ChildFund staff and representatives as part of the process for induction and socializing the policy to raise awareness.
- 5.1.6.3.** ChildFund will also incorporate the safeguarding policy and Behavior Protocol into the standard induction agenda for all new staff and representatives.
- 5.1.6.4.** ChildFund will further take advantage of face-to-face events or gatherings that bring staff and representatives together to raise awareness and disseminate messages about the safeguarding policy and procedures.
- 5.1.6.5.** A record of all staff and representatives reached will be kept on file.

5.1.7. Mandatory Training and Education

- 5.1.7.1.** All new ChildFund staff and representatives shall undergo mandatory training on the Safeguarding Policy and Behavior Protocol as part of the process for onboarding/induction.
- 5.1.7.2.** Refresher training for staff and representatives to be undertaken at least once a year facilitated by the Focal Points to continue building a safe organizational culture and embedding a sound understanding of safeguarding.
- 5.1.7.3.** Training in Country Offices for staff and representatives should reflect the local context, be culturally appropriate, and be targeted. The training should integrate PSEA, and commitments required of staff to undertake in line with PSEA principles to ensure prompt reporting of allegations and referral of survivors.
- 5.1.7.4.** All ChildFund staff and representatives to undergo training on how to recognize the signs and symptoms of abuse to appropriately identify, and report timely any alleged safeguarding concern/ abuse/ incident/ or disclosure or breach of policy to the Focal Point.

5.1.8. Safeguarding Leadership and Governance

- 5.1.8.1.** ChildFund Leadership shall actively promote and support safeguarding and visibly encourage a culture of raising concerns at the earliest point.
- 5.1.8.2.** Safeguarding should be a regular agenda item at senior leadership and management meetings.
- 5.1.8.3.** Safeguarding roles and responsibilities
 - 5.1.8.3.1.** The ultimate accountability for the implementation of this policy rests with senior leadership, specifically the President and CEO who ensures that the Safeguarding policy is disseminated to all staff and procedures integrated at all levels of the organization executed through the existing organization leadership and management structures/functions.
 - 5.1.8.3.2.** The safeguarding policy provides in-depth detail of the procedures that different business units within ChildFund are responsible for.
- 5.1.8.4.** **Safeguarding Management Structure**
 - 5.1.8.4.1.** **Designated Safeguarding Lead:**

- 5.1.8.4.2. ChildFund shall have a designated safeguarding lead (DSL), the Global Advisor, Safeguarding, to lead organizational initiatives and provide technical support to ensure ChildFund's internal practices reflect the organization's safeguarding commitment.
- 5.1.8.4.3. The DSL will work closely with senior leaders and Focal Points across divisions and in country offices to ensure proper support and accountability measures are taken.
- 5.1.8.4.4. The role shall reflect the nature and structure of the organization and the person will be senior enough and have a direct communication line to the President/CEO and/or Board on matters pertaining to safeguarding, have enough support, structure, and resources, to carry out the functions of an organizational safeguarding lead.
- 5.1.8.4.5. ChildFund will appoint and designate Focal Points at divisional, regional and Country Office levels as immediate contact persons to whom staff, program participants, and representatives within their jurisdiction can report cases of abuse and for appropriate action.
- 5.1.8.4.6. ChildFund shall ensure a functional safeguarding structure at different levels with specific safeguarding mandates to ensure safeguarding is a top organizational priority to support policy implementation at both leadership and management levels:
- 5.1.8.4.7. ChildFund has strategically positioned the safeguarding policy implementation under Global Operations. Global Operations possesses a broader mandate over ChildFund's field operations and programs. The Global Operations Management Team consists of the Regional Directors, Emergency and Response, Safety and Security, and Program and Partnerships to ensure good integration.
- 5.1.8.4.8. The ChildFund Vice President for Global Operations is the designated Global Leadership Team member for safeguarding who ensures safeguarding is a standing agenda item at all leadership meetings and a key priority for the Global Leadership and Executive Teams. The Global Leadership Team is responsible for safeguarding policy development and updating functions; with the final approval vested in the Executive Team.
- 5.1.8.4.9. The Global Operations Management Team is designated as the Global Safeguarding Management Team responsible for the implementation of the approved policy.
- 5.1.8.4.10. At the Regional level, the Regional Directors (RD) shall designate a safeguarding Focal Point responsible for coordination and support of regional safeguarding functions e.g., staff capacity building, incident management - the Focal Point shall be accountable to the RD.
- 5.1.8.4.11. At the Country level, the Country Director shall appoint a CO Safeguarding Focal Point and CO Safeguarding Incident Management Team (SIMT) responsible for coordination of functions related to policy implementation, incident management, and support to partners guided by a CO Safeguarding Action Plan. The CO Focal Point shall be the secretary to the SIMT. Safeguarding committee members to receive annual safeguarding training or refreshers.

5.1.9. Safe Programs/Projects

- 5.1.9.1.** The Do No Harm and the Best Interest principles shall inform all ChildFund programming actions in the development and humanitarian contexts to ensure:
- 5.1.9.2.** Program participants are not harmed or put at risk of harm through the design and delivery of a ChildFund program, project, event, or other activities and processes.
- 5.1.9.3.** Safeguarding risk assessments and mitigation will be an integral part of every ChildFund program/project lifecycle/life-stages. Country Offices will conduct risk assessments at the Identification, Design, Implementation, Monitoring, Evaluation, and Learning stages of every program/project and maintain a risk register that is periodically updated.

- 5.1.9.4.** All programs and projects consider the environmental, social, and contextual impact (intended or unintended) on program participants and communities engaged.
- 5.1.9.5.** Program participants effectively participate in program and project interventions, and MEL processes, and their ideas and inputs are documented and considered to inform planning and to address necessary program/project changes.
- 5.1.9.6. Humanitarian context/Emergency response:**
 - 5.1.9.6.1.** ChildFund is cognizant of the fact that implementation of programs and projects in emergency settings may increase the risk of harm to program participants.
 - 5.1.9.6.2.** ChildFund upholds the responsibility of ensuring that emergency context programs and operations do not put persons of concern or affected populations at greater risk of harm.
 - 5.1.9.6.3.** ChildFund places people and communities affected by disasters and crises, especially children, at the center of emergency and humanitarian response.
 - 5.1.9.6.4.** All staff working on emergency responses shall play a critical role in ensuring ChildFund remains accountable towards the people we aim to assist. Refer to the AAP Guidelines annexed to the policy.

5.1.10. Safe visits to ChildFund Programs/Operations

- 5.1.10.1.** Visits to programs may be undertaken by any supporter – sponsors, donors, corporations, media, celebrities, politicians, etc. All visits are coordinated by ChildFund, and a comprehensive donor visit procedure/checklist is in place.
- 5.1.10.2.** A pre-visit briefing regarding the safeguarding behavior protocol including aspects on confidentiality, and privacy is undertaken with the family of the child being visited and the supporter in advance of the visit.
- 5.1.10.3.** The pre-visit briefing includes supporter engagement staff advising the donor on the requirement to have a criminal background check and the importance of safeguarding.
- 5.1.10.4.** ChildFund screens visitors including conducting criminal background checks, prior to field visits. Note: In those countries where background checks are not legally allowed, alternative procedures, as determined by ChildFund Alliance partners, must be in place.
- 5.1.10.5.** Country Offices provide visitors with pre-arrival information on the culture, context-specific behavior protocols, logistics, ChildFund programs, and the sponsored child and community.
- 5.1.10.6.** Security briefing and review of the safeguarding policy and Behavior Protocol is undertaken and signed by the visitor before visiting the child.
- 5.1.10.7.** During the debrief meeting, the designated Country Office staff reviews the Safeguarding Policy/Behavior Protocol with the supporter and asks them to sign as a commitment to comply. The minimum safeguarding requirements outlined in the Behavior Protocol are explained to include among others: the visitor will always be supervised/accompanied by ChildFund staff during the visit, no contact information can be exchanged, follow photo consent procedures, and the visitor cannot return to the community without authorization and unaccompanied.
- 5.1.10.8.** If a ChildFund staff member is unable to accompany the visitor, the Country Office will authorize a designated Partner Organization representative, who must have signed, fully understands, and comply with ChildFund Safeguarding Policy and behavior protocol and visit guidelines.
- 5.1.10.9.** If the visit involves a sponsored child, the child's parent or guardian must also be present during the visit/meeting between the child and the visitor. At no time can the visitor and

- child be left alone, and meetings will take place in a public place and not the child's home.
- 5.1.10.10.** A post-visit debrief takes place with the Country Office. This allows the visitor to raise any concerns observed and provides an opportunity for the Country Office to respond, provide additional information, or answer questions. The Country Office sends a report on the visit to the International Office and describes any child safeguarding concerns that have arisen.
- 5.1.10.11.** Actual or suspected cases of any abuse or inappropriate behavior by a visitor are reported immediately to the Country Office Safeguarding Focal Point. An investigation is undertaken and may result in a criminal investigation.
- 5.1.10.12.** ChildFund reserves the right to refuse unannounced visits. Guidelines that are in place for dealing with unannounced visits require Country Offices to contact the International Office for guidance and advice. Any red flags or concerns noted in the sponsorship database are identified by the International Office, and the Country Office is informed. It is then at the discretion of the Country Director to decide if the visit should go ahead. As with all visits and upon approval, the visitor will be accompanied by a ChildFund or authorized Partner Organization staff, and a post-visit debrief must take place.
- 5.1.10.13.** **Managing Supporter Violations:** If a supporter or visitor is found to have violated the safeguarding protocols or if background checks reveal disqualifying events for sponsoring a child, the ChildFund sponsorship database marks these actual or potential sponsors as "safeguarding restricted." When an active sponsor is disqualified, the family of the sponsored child is notified and advised on how to protect themselves should the sponsor attempt to make contact. ChildFund does not allow sponsorship from individuals marked "safeguarding restricted."
- 5.1.10.14.** **Monitoring Supporter Engagement Practices:** Global Assurance conducts an audit of each Country Office at least every four years, including an assessment of the sponsorship procedures and controls, and an internal control review of each Local Partner at least every three years, including an assessment of the sponsorship practices against the requirements of the Letter of Agreement signed by the Local Partner.
- 5.1.11. Safe Child Participation**
- 5.1.11.1.** **Travel guidelines:** All ChildFund facilitated child and youth travels to participate in an event should comply or adhere to the child and youth event participation guidelines and all documentary evidence maintained on file, for all children or youth participating. This includes the participation agreement, Parental/guardian's consent Form; Medical History Form, Travel Registration Form; Media Consent Form; Letter to Parent, etc.
- 5.1.11.2.** **Child participation risk assessments:** Conduct thorough risk assessments prior to encouraging child/youth participation in program/project, advocacy activity/event; develop and implement mitigation plans to prevent the risk of harm or abuse identified.
- 5.1.11.3.** **Written Consent:** Participation must be voluntary and therefore written consent agreeing to participate in the activity/event should be obtained.
- 5.1.11.4.** **Confidentiality** should be assured in all child participation. The recording or documentation and sharing of information from the discussion should be kept safe and not accessed by any unauthorized persons.
- 5.1.11.5.** **Psychosocial support:** Protect children from any emotional distress/trauma, or other forms of harm. Plan for psychosocial support in case any child becomes distressed during the activity and needs assistance. In any case, the event/activity should be paused or stopped for support to be extended to any distressed child.

- 5.1.11.6. Respect Privacy:** Respect the privacy of participating children and follow acceptable standards of behavior, use age-appropriate facilitation techniques and be sensitive to any differences in culture, level of knowledge; power inequalities.
- 5.1.11.7. Expectations** Avoid raising unrealistic expectations or making promises that cannot be kept. Follow through on all commitments made and give children feedback.
- 5.1.11.8. Feedback:** Debrief with children after the event or activity to ensure they're not distressed in any way

5.1.12. Working through Partners and other third parties

- 5.1.12.1.** The ChildFund programming approach emphasizes working through local/implementing partners and in collaboration with other organizations at the strategic level.
- 5.1.12.2.** ChildFund will partner with local partner organizations that commit to comply with its Safeguarding requirements to ensure the delivery and implementation of safe programs and services. Refer to the [safe partnership procedure/checklist below](#) to be implemented by ChildFund to ensure safe partnerships (a detailed procedure/checklist is appended):

ChildFund Safe Partnership Procedure

Procedure	Description
a. Safeguarding Orientation:	- ChildFund's commitment to zero tolerance for any form of SEA, inaction, and retaliation against complaints/witnesses. - Implication of the ChildFund safeguarding policy requirements/clauses and behavior protocol included in the LOA.
b. New partners' safeguarding due diligence assessments:	- Include safeguarding criteria in the due diligence checks, and partner application forms, used to select potential partners. - Conduct safeguarding due diligence assessments to inform the go or no-go decision to formalize the partnership. - Develop a capacity improvement plan to address the gaps/risks within 90 days of signing the LOA. - The plan is implemented, regularly reviewed, and monitored
c. Risk Assessments for existing partners:	- Orient the partner on ChildFund Safeguarding Policy requirements. - Conduct a safeguarding capacity/risk assessment. - The partner is supported to develop and implement a safeguarding capacity improvement/risk mitigation plan within 60 days of the assessment. - The plan is implemented, regularly reviewed, and monitored,
d. Legal agreements	- All LOAs include a clause that requires partners to meet or exceed the standards of the ChildFund Safeguarding Policy and procedure. - All partner staff and representatives to have signed a commitment to comply with their safeguarding Policy and behavior protocol.
e. Partner safeguarding reviews and support:	- Partners shall be reviewed at least once a year for compliance. - Include safeguarding in partner quarterly, bi-annual, or annual reviews and reflections. - Provide partners with access to a safeguarding checklist, other useful resources, tools, templates, and training
f. Partner program reporting:	Questions on safeguarding shall be included in quarterly, bi-annual, or annual reporting templates for partners on safeguarding measures and actions.
g. Awareness for program participants:	Ensure partners develop and implement deliberate measures to continuously sensitize program participants on the safeguarding policy and the behavior protocol.
h. Reporting safeguarding policy concerns:	Mandatory requirement for partners to report all safeguarding concerns or incidents committed by a Partner Organization's staff or representative to the ChildFund CO Safeguarding Focal Point within 24 hours of notice.
i. Termination of agreements:	Failure to implement the capacity improvement plan by a partner will lead to a review of the partnership arrangement and funding.

Procedure	Description
	- Partners shall agree to terminate any staff or volunteer found to be in breach of the Safeguarding Policy and behavior protocol, subject to national/local Labor Laws. - Any breach of the Safeguarding Policy and procedures – through disregard or negligence--by any partner organization shall form a basis for termination of any running legal agreement, partnership, or Memorandum of Understanding.

5.1.12.3. Implementing Partners may have signed agreements with Country Offices such as the Letters of Agreement signed by Local Partners, which requires them to maintain and adhere to their own Safeguarding Policy and Procedure which is at least as stringent as ChildFund's. In the absence of such agreements, partners and their associated personnel will be required to comply with ChildFund's safeguarding minimum standards in this policy.

5.1.12.4. ChildFund commits to supporting local partner organizations to develop and strengthen their safeguarding systems and practices to comply with their organizational safeguarding policies.

5.1.12.5. ChildFund shall engage with local partner organizations to support and implement safe programs at all levels for program participants and everyone they interact with through partnership activities.

5.1.12.6. The partner shall have a dedicated focal point that has responsibility for the development and implementation of the organization's safeguarding policy or related procedures.

5.1.12.7. Local partners are required to report breaches of their own safeguarding policies to the ChildFund safeguarding focal points. This aligns with the principle of being accountable and transparent to one another in addressing safeguarding concerns and incidents.

5.1.12.8. Failure to report safeguarding concerns on the part of the local partner may lead to the review and termination of the partnership relationship or letter of agreement.

5.1.12.9. The requirements under this section must be included in any agreement with Implementing Partners and the Letter of Agreement must be updated to include them.

5.1.13. Procurement of business partners/vendors and other third parties:

5.1.13.1. ChildFund will ensure that processes for procuring and contracting vendors who supply the organization goods and services are designed, implemented, and reviewed in line with safeguarding requirements and principles. Contractors and Suppliers who have contact with program participants and/or their personal data will be:

5.1.13.2. Assessed for the level of contact with program participants and/or access to data through the delivery of services and goods.

5.1.13.3. If the nature of their work requires them to interact with program participants' data, the vendor or contractor is required to take all appropriate measures to ensure the protection and confidentiality of that data.

5.1.13.4. The Behavior Protocol is annexed to all contracts where there will be contact with program participants and/or their data, and the policy is made available to all other contractors and suppliers on request.

5.1.13.5. Contractors and vendors who may come into direct contact with program participants, or have access to data held on them, receive a pre-contract briefing on ChildFund's safeguarding policy, behavior protocol, and Non-Disclosure Agreement which they sign as part of the contract (include appropriate clauses or attachments to the contract).

5.1.13.6. In addition, the vendor or contractor must guarantee that personnel providing those goods and services do not have current or past convictions related to sexual exploitation and abuse, neglect, or other criminal convictions.

- 5.1.13.7.** If the vendor or contractor later finds out that personnel do have current or past convictions related to abuse, ChildFund reserves the right to terminate the contract.
- 5.1.13.8.** ChildFund has zero tolerance for all forms of child labor³ as defined by the International Labor Organization (ILO) convention. In all its programs, partnerships, or business dealings, ChildFund does not tolerate the use of children in work or forced labor that prevents school attendance, nor the exploitation of children or engaging children in work that is hazardous to their physical or mental health.

5.1.14. Communications and Data Management that are Safe and Ethical

- 5.1.14.1.** Abuse or harm can take place during direct contact with program participants online or physically. ChildFund will manage program participants' sensitive information or data in a manner that is respectful, professional, confidential, and compliant with applicable laws and standards regarding the collection, storage, retention, handling, and usage (including transmission) and disposal of such information and data.
- 5.1.14.2. Awareness:** To prevent harm, program participants, staff and representatives are made aware of the risks in the collection, storage, and usage of personal information or data, visual images, videos, and audios, for persons who feature prominently in a story for marketing and communications purposes, and how to utilize social media and digital technology platforms safely and appropriately to prevent/mitigate any risk of harm and report such safeguarding risks or concerns for appropriate action.
- 5.1.14.3. Training of data collectors:** ChildFund shall always ensure that data collectors are appropriately screened, undergo background checks, are trained on safeguarding policy and behavior protocols, and are made aware of their responsibilities to appropriately prevent, detect, report, and respond to harm during data collection.
- 5.1.14.4. Informed Consent⁴:** Informed consent or permission is obtained from all program participants who primarily feature in ChildFund documented stories, videos, and before they are published either online⁵ or in the print media. Where the primary subject is a child, parental/guardian consent written in a locally understood language is obtained from either the parent, guardian or other legally required entity or individual. ChildFund does not share images (digital or non-digital) that would in any way exploit, degrade, or abuse program participants.
- 5.1.14.5. Dignity and Respect:** There are guidelines for posting or sharing images/ information and web publishing standards adhered to ensure the images shared to promote the dignity and respect of respective program participants, including appropriate geo-tagging, digital watermarking, hiding the identity when required, and image tracking. Program participants are not treated or portrayed in images as helpless victims or in sexually suggestive ways/poses but as an honest representation of the context and facts.
- 5.1.14.6. Security of sensitive information:** Standards that govern the safe storage, retention, handling (including transmission) and disposal of program participants' sensitive information (including all sponsorship personal information, communications, images and consent forms, information relating to safeguarding incidents, investigations, and reports)

³ Child labour, as defined by the International Labour Organization (ILO) Convention is "work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under the age of 18 that is hazardous to the physical or mental health of the child.

⁴ Informed consent means the subject has a general understanding of the purpose of the reporting or photography and gives verbal or written permission thereof.

⁵ Online abuse can include creating abusive images, online grooming, sexual harassment, online exploitation, radicalization, stalking, cyber bullying, 'sexting', exposure to inappropriate content such as pornography featuring adults or distressing content such as violence or discriminatory content.

in place. Children and their caregivers have access to, and review information held about them. At the end of the partnership, all sensitive information held by the Partner Organization is returned to ChildFund International to be securely archived or disposed of appropriately.

- 5.1.14.7. Confidentiality⁶:** Always maintain confidentiality of sensitive information. This includes personal information on children and vulnerable adults (program participants), as well as information relating to any alleged cases of abuse, neglect, or exploitation, including information on alleged or actual perpetrators. In certain circumstances, any lack of confidentiality may have devastating effects on survivors.
- 5.1.14.8. Information sharing:** When sharing enrolled children's and other program participants' sensitive information outside of ChildFund International, the transfer should be encrypted, and information only shared on the "need-to-know" basis.
- 5.1.14.9. Reporting concerns:** All ChildFund website homepages, web pages, portals and social media profile pages shall contain reporting options for safeguarding concerns or incidents, including a legal privacy and confidentiality disclaimer. All policy breaches or concerns are reported to the safeguarding focal point through established reporting mechanisms. At community level, safeguarding concerns from program participants are to be reported, tracked, and handled through community-based Complaints Response Mechanisms.

5.1.15. Supporter Engagement

- 5.1.15.1.** ChildFund's approach to Supporter Engagement incorporates safeguarding by communicating and promoting a commitment to safeguarding by supporters, monitoring, and screening physical or virtual communications between children and sponsors, acting when behaviors put children or sponsors at risk of sexual exploitation and abuse and other harms, and regularly assessing safeguarding procedures to ensure a child-safe environment.
- 5.1.15.2.** The ChildFund Standard Operating Procedure Manual for Child Sponsorship provides detailed guidance on this.
- 5.1.15.3.** To prevent harm, supporters, staff, and representatives are to be informed of ChildFund's commitment to safeguarding and to align their own behaviors with this commitment. This includes their understanding of how communications between sponsors, as a subset of all supporters, and children are managed.
- 5.1.15.4.** To ensure that children are not placed at risk through communications with sponsors, several risk mitigation strategies are to be adhered to:
 - 5.1.15.4.1. Selection Criteria:** That selection of children for sponsorship is done based on clearly defined criteria to ensure non-discrimination among children, within families, and communities.
 - 5.1.15.4.2. Review of Sponsor Communications:** All communications/correspondences (paper or electronic) between supporters and children go through Content and they are screened to prevent exchange of inappropriate or harmful content and addresses between the child and supporter to prevent risk of direct, unsupervised contact.
 - 5.1.15.4.3. No Unsupervised Contact Between a child and Supporter:** All direct communications and contact between a supporter and child either physical, and/or virtual through social media

⁶ Confidentiality protections require that names and identities of persons involved in a policy violation are made available only to those who are directly involved in any decisions taken, with the full understanding that they are not to disclose that information to anyone else except as may be required by applicable law.

and digital technology platforms online are supervised, facilitated, and monitored by ChildFund International through authorized mechanisms and platforms that protect the privacy of both the child and sponsor, and prevent any risk of harm or abuse.

- 5.1.15.4.4. **Train Staff and Representatives:** Training of staff and local partners to monitor, recognize and respond to abuse, facilitate constructive interaction with parents and children, implement child protection programming interventions, securely handle, and store children's personal information, and gather only the minimum elements of personal information necessary for the program.
- 5.1.15.4.5. **Awareness raising:** Staff and representatives are made aware that a child's personal information/data is to be accessed only by ChildFund staff and authorized representatives who require the information to perform their work.
- 5.1.15.4.6. **Confidentiality Of Child and Supporter Data:** All personal information/ photos/ videos/ audio clips about children and sponsors is stored in locked and secure facilities or password protected; accessed, shared, and controlled by a limited number of authorized people. Any information shared does not include the child or supporter's physical address or contacts.
- 5.1.15.4.7. **Supporter Visits:** Visits by the sponsor to the child are pre-planned and take place in a neutral place facilitated and supervised by a ChildFund staff and/or authorized representative.
- 5.1.15.4.8. **Safe Use of social media:** All children, their parents, and adult participants in supporter engagement or other program/project activities with information technology elements are always trained on how to utilize social media and digital technology platforms safely and appropriately while avoiding risks and appropriately responding to threats/harm.
- 5.1.15.4.9. ChildFund will not knowingly allow a supporter to remain in a sponsorship relationship if they have a **conviction for child abuse or a related offense**. ChildFund implements this protection tenet by consistently following procedures such as background checks and public records searches when supporters are to come in direct, physical contact with children, and ChildFund retains the right to carry out such checks at other times, when deemed appropriate.

5.2. REPORTING SAFEGUARDING CONCERNS AND THE ESCALATION PROCEDURE

ChildFund will ensure there are safe, confidential, accessible, transparent, and survivor-focused **allegation and incident reporting mechanisms** established for staff, representatives, program participants, and communities to raise concerns in a timely manner. Additionally, there will be complaints response mechanisms for program participants and communities, to raise safeguarding complaints/concerns related to sexual exploitation, abuse, neglect, and all other forms of harm arising from their interactions with ChildFund staff, partners, and all representatives, programs, and operations.

Country Offices shall have communication materials and reporting channels available in locally relevant languages and presented in a way that all groups including children understand. There will be a detailed description of how all stakeholders can report concerns and the Focal Points shall keep a detailed register of safeguarding issues raised and how they are dealt with.

5.2.1. Raising a Safeguarding Concern or Incident Report by staff and representative:

It is mandatory for ChildFund staff and representatives to report safeguarding, child protection, human sex trafficking or sexual exploitation and abuse concerns within 24 hours of notice or being informed of a potential or alleged violation, incident, or breach of the Safeguarding Policy, Behavior Protocol, and any other alleged form of misconduct or harm towards program participants including reasonable suspicion and/or knowledge of misconduct. This relates principally to any abuse/harm of a program participant in contact with ChildFund through its work but also encompasses other members of the

wider communities where we work if we become aware of actual or potential harm to them by ChildFund staff, programs and/or operations.

5.2.2. Self-Reporting a safeguarding concern or incident:

- 5.2.2.1.** If an allegation is made against you, directly to you, you should make a written report of the concern, allegation, or incident to your Safeguarding Focal Point or Manager immediately.
- 5.2.2.2.** The Safeguarding Focal Point or Manager will notify Global Assurance to act appropriately per nature and the level of incident reported.
- 5.2.2.3.** Possible situations that should be self-reported include such things as:
 - 5.2.2.3.1. You accidentally hurt a child or vulnerable adult, or they are harmed in any way.
 - 5.2.2.3.2. A child or vulnerable adult appears to be sexually aroused by you.
 - 5.2.2.3.3. A child or vulnerable adult misunderstands or misinterprets anything you have done in a way that could be construed as a breach, or potential breach, of the safeguarding policy.
 - 5.2.2.3.4. You are involved in activities that might be misconstrued as a breach of the Safeguarding Policy or behavior protocol.

Who to Report To:	How to Report
1. Directly to your Manager, Global Advisor, Safeguarding and PSEA, Global Assurance, Global Human Resources or Legal	Verbally or email: complaints@childfund.org
2. Your Safeguarding Focal Point	Using an incident report, Who then submits an incident report through the Ethics Point website.
3. Complaints email (may be anonymous or provide your name)	complaints@childfund.org
4. Whistleblower Mechanism via Website or Telephone (may be anonymous or provide your name)	http://speakup.childfund.org The telephone number for your country is on the website.

5.2.3. Escalation of Safeguarding Incidents/Concerns Reported by Staff or Representative:

Global Assurance will ultimately receive complaints reported through the Whistleblower Mechanism and the complaints mailbox and, with GHR and Legal, conduct the screening process. Safeguarding complaints will be screened and categorized according to the following definitions:

INCIDENT	Definition	Reporting and Escalation Protocol by Global Assurance:	Action Steps & Responsibilities for Management Action
Level 3	- A gross violation (actual or suspected abuse) of a program participant's right to protection committed by a ChildFund staff or representative resulting into harm including but not limited to any form of violence, exploitation, abuse, neglect (sexual, physical, emotional, verbal, or financial) - Any death or serious injury of a program participant while under ChildFund's temporary care, or while participating in or at a ChildFund organized or facilitated event, activity, or caused directly by a ChildFund staff, representative.	- Gross violations shall be reported within 24 hours of occurrence or first notice of the occurrence of the violation. - Reports are made to the Safeguarding Focal Point, Country Director, and the IO Global Safeguarding Lead through the established reporting mechanism. - ChildFund shall respond with accountability to the ChildFund CEO and VP of Global Operations. - The Global Operations Management Team shall be accountable for the effective management of level 3 safeguarding concerns in collaboration with Global Human Resource, Legal Counsel, Security and Safety, etc. as appropriate.	Focal Point: Receive incident report. - Focal Point/CD convene CO Safeguarding Incident Management Team meeting. - The Safeguarding Incident Management Team develops a Case/Incident Management Action Plan that is survivor-centred and coordinates response action. - Assess and address the survivor's needs through assistance and referral i.e., safety, medical, MHPSS, legal, material, etc. Communications: Assess media risk and prepare a crisis management/response plan/communique. All communications with the media are to be made by the authorized officer or spokesperson only. Legal Counsel: Assess legal implications and decision for referral if criminal. Quality Assurance: To undertake an administrative investigation to establish the facts in relation to the allegation. Focal Point: Track the progress of implementation of actions and keep the CD, RD, Safeguarding Advisor, VP Global Operations, and CEO updated/informed. - Documentation: The Focal point tracks, records and documents every stage of the process/action - CD is responsible and the VP Global Operations/RD is Accountable for Level 3 incidents. CEO notified and updated on progress.

INCIDENT	Definition	Reporting and Escalation Protocol by Global Assurance:	Action Steps & Responsibilities for Management Action
			11. The lead investigator advises Global Assurance of remediation and closure of the investigation when complete.
Level 2	Any violation or breach of the ChildFund Safeguarding policy, procedure, behaviour protocol, or code of business conduct and ethics by a ChildFund staff or representative putting program participants in direct risk of harm or abuse, but where no actual harm is believed to have occurred	- Shall be reported to ChildFund within 48 hours of occurrence or first notice of the occurrence of the breach that puts program participants at risk of harm or abuse. - ChildFund shall respond to level 2 with accountability to the Regional or Divisional Director. - Cases identified as level 2 shall be reported to the Safeguarding Focal Point for management.	Focal Point: Receive incident report. - Focal Point/CD convene CO Safeguarding Incident Management Team meeting. - The Safeguarding Incident Management Team develops a Case/Incident Management Action Plan that is survivor-centred and coordinates response action. - Assess the risk and develop a mitigation plan with adequate treatments to address the concern in a timely manner to strengthen safeguards. Focal Point: Tracks and documents the progress of implementation of actions, updates the risk mitigation plan and keeps leadership, and the Incident Management Team updated on progress and support needs Global Operations and CEO updated/informed.
Level 1	This refers to child protection incidents that are NOT committed by a ChildFund staff or representative, but by any other member of the community or an external agency not affiliated to ChildFund. This may include a child protection incident involving serious physical,	- Accountability for management of Level 1 incidents shall be with Local Partners - ChildFund CO safeguarding Focal Point to be notified within 72 hours of notice in cases of serious harm that would threaten the safety and well-being of the child or young person.	- The Local partner to develop and implement a Child Protection Response Plan and referral pathway that addresses the best interest principle⁷. - Develop and implement a comprehensive individual Case plan in consultation with the family/guardian. - Report the incident to the appropriate authorities. - Timely notify ChildFund highlighting any support needs in line with the case plan

⁷ This requirement would have to be put in the agreement with the Implementing Partner or in the LOA with the Local Partner

INCIDENT	Definition	Reporting and Escalation Protocol by Global Assurance:	Action Steps & Responsibilities for Management Action
	emotional, sexual, or psychological harm, or other form of violence, injury, or death of a program participant e.g., an enrolled child.	ChildFund will monitor and appropriately follow-up with the local partner to ensure adequate and timely support to the victim.	

5.2.4. Recording safeguarding concerns:

- 5.2.4.1.** Focal Points shall maintain an accurate record or register of all safeguarding concerns that have been received/reported and keep a detailed register of how they are dealt with or managed to closure.
- 5.2.4.2.** All safeguarding concerns are tracked and recorded by the Focal Points, and all have been reported to Senior Management and Global Assurance. There are no cases of employees or representatives failing to report safeguarding concerns.
- 5.2.4.3.** Reports of suspected or known violations must be submitted within 24 hours of notice of occurrence or learning of the violation.
- 5.2.4.4.** The report should include among other details: the Date, time, and place of the incident; Nature of the violation - what happened; Actions that are happening at the time of the report to keep the survivor safe; Help or actions required.
- 5.2.4.5.** The Senior Director of Global Assurance reports the number of safeguarding complaints received and their outcome to the President and CEO, VP Global Operations, CFAO, and Audit Committee of the Board of Directors three times a year.
- 5.2.4.6.** The General Counsel will report the number of cases to the Board on an annual basis.
- 5.2.4.7.** The organization limits the number of people with access to reported information and removes identifying information of those involved when sharing information.

5.2.5. Complaints Response Mechanisms (CRM) for Communities

A complaints response mechanism is a way for communities who participate in your organizational projects and activities to raise safeguarding concerns and complaints. Safeguarding concerns, however, do need to be dealt with differently from other complaints since such concerns are sensitive and confidential.

- 5.2.5.1.** ChildFund to establish Community-Based Complaints Response Mechanisms (CFMs) in all community-based programs, and all program participants made aware of how to access and report abuse, exploitation, and other breaches of the safeguarding policy and Behavior Protocol by ChildFund staff, and/or representatives.
- 5.2.5.2.** Communities, program participants, or affected populations (including children) in the case of humanitarian settings are consulted about the design, implementation and monitoring of the complaints and feedback mechanisms.
- 5.2.5.3.** Are accessible, inclusive, safe, confidential, transparent, survivor-centered/focused and based on existing communications methods that the community already uses.

- 5.2.5.4.** Have multiple channels for communities to provide feedback designed in collaboration with program participants taking into consideration the vulnerabilities and preferences of all demographic groups.
- 5.2.5.5.** Provide opportunities for regular communications, collaboration, and feedback between staff and program participants on reporting channels.
- 5.2.5.6.** Have accompanying guidelines on receiving, handling, and responding appropriately in a timely manner to complaints/reports of harm and abuse.
- 5.2.5.7.** Staff and partners have been trained in how to effectively receive and respond to a safeguarding report or complaint.
- 5.2.5.8.** Complaints that cannot be addressed by ChildFund and its partners, are referred in a timely manner to other relevant organisations or service providers.
- 5.2.5.9.** Partnership agreements include clear definitions of the roles, responsibilities, and commitments of each partner, including how each partner will contribute to the complaints and feedback mechanisms.
- 5.2.5.10.** The processes and procedures or mechanisms are made known to and understood by communities; staff; partners; and other representatives. The functionality of the Complaints and Feedback Mechanisms are monitored.

5.3. RESPONDING TO SAFEGUARDING CONCERNS AND SURVIVOR SUPPORT

ChildFund COs shall have in place a system to ensure survivors of abuse, including children, young people and vulnerable people receive immediate professional assistance referring them to relevant service providers.

5.3.1. Assistance and Referral

- 5.3.1.1.** ChildFund emphasizes the **Survivor Centred Approach**⁸ in the provision of assistance and referrals for support to survivors of sexual exploitation, abuse, and all other harms. At the forefront of any complaint and investigation, the survivors' views and needs are seen as a priority and central to every action or decision-making process.
- 5.3.1.2. Organization level**
 - 5.3.1.2.1.** ChildFund will complete a trauma-informed organizational self-assessment to examine the organization's existing practices.
 - 5.3.1.2.2.** Ensure staff at all levels of the organization receive training and education on the Trauma-Informed Approach to recognize and respond effectively to survivors' needs and are aware of case management and referral procedures/processes.
- 5.3.1.3. Country Office Level for Program Participants:**
 - 5.3.1.3.1.** ChildFund shall map support services in respective program locations or countries so that survivors have functioning referral pathways for a comprehensive range of services available locally, based on their needs and consent.
 - 5.3.1.3.2.** Country Offices/partners to maintain an updated list of local service providers and information on local support services available for victims/survivors?

⁸ In a Global Scoping of Initiatives to Support Survivors of SEA it was identified that there is no single, universally agreed, survivor centred model or set of standards. While guidance exists in the areas of case management, Child Protection, gender-based violence and violence against women it is not consolidated/adapted to SEA. As there is no universally agreed survivor centred model, associated standards, guidance, and tools. This creates challenges to the aid sector as organisations may respond quite differently in reporting and response (Plasket, I. (2020) *Global Scoping of Initiatives to Support Survivors of SEAH: From Reporting to Response*, RSH Helpdesk Research Report No. 2. London UK: RSH)

- 5.3.1.3.3. ChildFund to have a system in place to ensure survivors of sexual exploitation, abuse, and other harms, receive immediate professional assistance and are referred to professional service providers.
- 5.3.1.3.4. **Survivors shall be informed** of the available services and procedure on the referral pathway/process, outlining the steps to take, and the guiding principles for the provision of assistance and support - including concerning confidentiality and informed consent. Where ChildFund programs cannot provide the necessary assistance, referral to appropriate support services below would be recommended:
 - 5.3.1.3.4.1. **Safety:** Immediate assistance may include the development of an urgent safety or protection plan to address the risk of retaliation, re-traumatization, or further harm to the victim. The safety response to include advising victims about any limits in the capacity to protect them.
 - 5.3.1.3.4.2. **Psychosocial support:** Includes Psychological First Aid (PFA) or basic counselling to assist victims in addressing practical matters arising from the complaints, as well as enabling access to basic services, peer-to-peer support, enhanced social support through reconnecting with family members, friends and neighbours, and/or fostering social connections and interactions through existing community networks.
 - 5.3.1.3.4.3. **Medical care:** This includes informing victims about the importance of seeking medical care within 72 hours in cases of sexual abuse, including HIV post-exposure treatment and emergency contraception as needed and desired while providing a referral.
 - 5.3.1.3.4.4. **Legal services:** Victims may be referred to providers of legal assistance, where available, and if so desired by the victim.
 - 5.3.1.3.4.5. **Basic material assistance:** This may include the provision of food, clothing, shelter, school, reintegration, and livelihood support, to help address the immediate needs of particularly the most vulnerable victims.
- 5.3.1.3.5. Where the alleged act constitutes a crime, the focal point should explore with the complainant or survivor whether they would like assistance with reporting to law enforcement authorities or police. For a vulnerable adult, the decision to report to the rests solely with the complainant/survivor. In the case of a child, reporting is mandatory.

5.3.2. Investigation of Safeguarding Concerns

- 5.3.2.1. ChildFund has in place a process to ensure timely administrative investigation⁹ of all allegations or incidents of a safeguarding nature reported through ChildFund's established reporting mechanisms.
- 5.3.2.2. This includes a referral and follow-up system for investigations whereby all cases or incidents reported are referred and acted upon.
- 5.3.2.3. Administrative Investigations are undertaken by experienced and qualified professionals who are trained in sensitive investigations and on the survivor-centred approach.
- 5.3.2.4. Confidentiality is a cardinal principle and shall be upheld regarding information, while carrying out investigations on alleged abuse, in all communications with the media and when reporting or referring safeguarding incidents including for criminal investigations.

⁹ The SEA administrative investigation takes place after an SEA complaint is received and assessed. Its purpose is to determine whether any SEA policies have been breached.

- 5.3.2.5.** The exact process of the investigation will be determined by the nature of the incident. However, the general process steps and actions in the attached checklist shall be followed by ChildFund during investigations:

5.3.3. The difference between Administrative and Criminal Investigations

Administrative Investigation	Criminal Investigation
Determines whether the subject of complaint has violated an organization's policies or procedures, such as an organization's Behavior Protocol.	Determines whether any law has been violated.
Does not result in filing formal charges.	May result in formal charges being filed against the Subject of Complaint/Concern.
Should be postponed or suspended pending the outcome of a criminal investigation if one is already underway, to avoid the possibility of damaging the criminal investigation.	Always takes precedence over an administrative investigation.

5.4. ACCOUNTABILITY, REVIEW, AND LEARNING

5.4.1. Risk Assessment and Management.

- 5.4.1.1.** ChildFund will conduct periodic internal safeguarding risk assessments to identify the risk type, risk impact potential, and implication to program participants.
- 5.4.1.2.** This will inform the development of a risk matrix/register and mitigation measures to prevent harm, monitor, and evaluate the effectiveness of safeguarding policy implementation.
- 5.4.1.3.** Risks to program participants that are identified through the risk assessments will be integrated into annual operation programs and budgeted for, and where necessary may constitute a specific project intervention.
- 5.4.1.4.** An updated safeguarding risk register shall be reviewed and shared on a quarterly basis with senior leadership and the board.

5.4.2. Monitoring, Reporting & Learning:

- 5.4.2.1.** ChildFund to establish a safeguarding Monitoring and evaluation framework with feasible indicators for monitoring harm/abuse caused by programs; and measuring policy implementation integrated in the CAMEL system; to track and measure progress, actions or decisions taken on reported concerns.
- 5.4.2.2.** ChildFund shall regularly conduct compliance checks/self-assessments to monitor and report on the progress of policy implementation. Performance trend analysis is performed to inform learning, and recommendations are reported to key stakeholders (Senior Leadership/Management, the board of directors, and partners) and included in the organization's reports.
- 5.4.2.3.** Those monitoring have been trained and know how to recognize concerns, and how to ask questions to understand whether the program is being delivered safely.
- 5.4.2.4.** The designated safeguarding focal points conduct periodic internal and partner compliance monitoring and reviews to check on the progress of efforts to implement the safeguarding policy and procedures through a clearly laid out accountability structure.

- 5.4.2.5.** Safeguarding metrics are integrated in established programs and partner learning events or at country, regional, and global levels with staff, and partners to reflect on what is going well and areas for continuous improvement.
- 5.4.2.6.** Regular feedback on safe program implementation and partner performance is provided to senior management including the board for appropriate action and to inform decision-making.

5.4.3. Review of the Policy and Practices

- 5.4.3.1.** Global Assurance performs limited reviews of Country Office compliance with the Safeguarding Policy and Procedure during their periodic audits.
- 5.4.3.2.** The ChildFund Safeguarding Policy and procedures shall be formally evaluated to inform policy revisions at least once every 3 years.
- 5.4.3.3.** Program participants and local partners shall be consulted as part of the review of the safeguarding policy and its effectiveness; and informed by any changes in the operational and legal context.
- 5.4.3.4.** Learning from practical case experiences shall inform policy review and changes to ChildFund's Safeguarding measures and procedures.
- 5.4.3.5.** ChildFund leadership is committed to supporting staff through training; access to professional development on safeguarding and in some cases access to counselling to create, promote, and facilitate a safeguarding culture change.

5.4.4. Breaches of the ChildFund Safeguarding Policy and Procedure

- 5.4.4.1.** Any breach of this safeguarding policy and behavior protocol by staff or representative will be treated as a disciplinary issue including failure to report a safeguarding concern or incident and will be dealt with in line with the disciplinary policy and procedures laid out in the appropriate Country Office Human Resource manual.
- 5.4.4.2.** Report any observed breaches of this policy and the Behavior Protocol to ChildFund the designated Safeguarding Focal Point/Lead through and/ or established reporting mechanisms.
- 5.4.4.3.** Serious breaches may result in termination of contracts and/or referrals made to law enforcement or other relevant authorities.

6. Key Terms and Definitions of the Policy

Terms	Definitions
Administrative investigation	It is a fact-finding process involving searching for, gathering, and examining information. Administrative investigations of sexual exploitation, and abuse (SEA) differ from criminal investigations of SEA.
Child	Is anyone under the age of 18 (as defined in the United Nations Convention on the Rights of the Child, regardless of the age of majority or consent in the country where the safeguarding violation may occur).
Child Abuse	Abuse refers to an act or pattern of behavior (often by someone in a position of power) that causes harm or injury to another person (usually in a less powerful position: Types of child abuse include physical, emotional, and sexual abuse, neglect, and exploitation, all of which can harm a child's health, survival, development, or dignity.

Terms	Definitions
Child labour	As defined by the International Labour Organisation (ILO) Convention is “work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under the age of 18 that is hazardous to the physical or mental health of the child.
Child Protection	Measures and structures are put in place to prevent and respond to abuse, neglect, exploitation, and all forms of violence against children.
Child Safeguarding	Is the responsibility of all organizations to make sure their staff, operations, partners, and programs do no harm to children.
Commercial Exploitation	Exploiting a child in work or other activities for the benefit of others and to the detriment of the child’s physical or mental health, education, moral or social-emotional development. It includes but is not limited to, child labor.
Contractor	Any person or company that has entered into an agreement with ChildFund to provide goods or services for a specified period.
Emotional Abuse	Persistent emotional maltreatment that impacts on emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyberbullying) and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.
Exploitation	Constitutes the abuse of a child where some form of remuneration is involved or whereby the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to physical or mental health, development, education, or well-being
Harm	It is difficult to define “harm” to children and vulnerable adults because children and vulnerable adults can be abused in so many ways depending on the context and culture. They may be abused in a family, an institution, a community, a faith setting, or via social media/internet. They may be harmed by an adult or adults or another child or children. There are also practices such as female genital mutilation (FGM) and forced or early marriage that cause significant harm to children and vulnerable adults.
Incident Reporting Form	A form that is used to record a case of safeguarding nature.
Program Participant	Any person or group of people who directly receive goods or services through participation or involvement in one or more of the programs, projects, interventions, or operations supported by ChildFund directly or through its representatives.
Project Participants	All actors participating and benefitting from ChildFund activities at both community and organizational levels.
Physical abuse	Actual or potential physical harm perpetrated by another person, adult or child. It may involve hitting, shaking, poisoning, drowning and burning. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.
Representative	Any person or entity formally related to ChildFund in a paid or unpaid capacity (i.e., staff, partner, volunteer, Intern, contractor, consultant, vendor, donor, visitor, board member, etc.)

Terms	Definitions
Safeguarding	The responsibility that an organization undertakes to make sure their employees/staff, operations, and programs Do No Harm to children, and vulnerable adults, thereby limiting their exposure to the risk of discrimination, neglect, harm, abuse, and exploitation. The term ‘safeguarding’ also refers to the measures put in place by the organization to prevent, report and respond to various forms of harm that could occur through the actions or inactions of your organization through all activities
Safeguarding Behavior Protocol	A document that lays out the acceptable and unacceptable behaviors which all employees and representatives are required to sign to affirm their understanding and commitment to safeguarding as laid down in the safeguarding policy.
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.
Informed Consent	Informed consent means the subject has a general understanding of the purpose of the engagement or activity and gives verbal or written permission thereof to voluntarily participant or get involved. When you ask for permission for children or vulnerable adults, to be involved in your activity, event, or program, ensure that (<i>for children and their parents or caregivers if needed</i>) fully understand: What the activity is about; what is expected of participants; what the risks and benefits of participating are; and that participating in the activity is voluntary.
Sexual Abuse	is actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions
Survivor-Centered Approach	means that the survivor’s and whistle-blowers’ rights, needs, and wishes are prioritized over the reputational consequences for the organization i.e., where the needs of victims are prioritized [...Where the individual has rights:] to be treated with dignity and respect, to choose, to privacy and confidentiality, to non-discrimination, to information.
Neglect and negligent treatment	Allowing for context, resources and circumstances, neglect and negligent treatment refer to a persistent failure to meet basic physical and /or psychological needs, which is likely to result in serious impairment.
Vulnerable Adult:	Any person over the age of 18 who is a program participant in ChildFund’s programs and who may not be able to make an informed decision that protects them from harm or exploitation. This may include a person with a disability and/or age, illness, or life circumstances that render him/her unable to take care of themselves.
Youth/Young People	to mean persons between the ages of 15 and 24. ChildFund recognizes that this category spans the categories of children and young adults but regards youth as having safeguarding needs that require distinct consideration aside from younger children and older adults.

7. ANNEXTURES

Definition of Key Terms  Key safeguarding terms and definitions.	CEO Pledge for InterAction Members  InterAction - CEO Pledge on Preventing
Safeguarding roles and responsibilities  Safeguarding Roles and Responsibilities.d	Safe partnership procedure  Safe Partnerships Procedure.docx
ChildFund Safeguarding Behavior Protocol  ChildFund Safeguarding Behavior	ChildFund Accountable to Affected Persons Framework and Guidance   1. ChildFund AAP Framework_Final.doc 2. ChildFund AAP guidance_Final.docx
Safe recruitment & selection criteria  Safe recruitment and selection procedure.d	Whistleblower Policy
ChildFund International Safeguarding Incident Reporting Tool  ChildFund Safeguarding Incident	DFAT Minimum Requirements/Checklist  DFAT Minimum Standards for CSG an
Safeguarding Investigations process steps  ChildFund Safeguarding Investig	