

SAVE THE CHILDREN CANADA POLICY AND PROCEDURE

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| Policy Title: | Child Safeguarding Policy | Department: | People, Organization and Strategy |
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1. Policy Statement

Safeguarding the children that we come into contact with throughout our work is a key priority for Save the Children Canada. Save the Children Canada acknowledges fully the duty to safeguard and promote the welfare of children, and ensure all our safeguarding measures are embedded, accessible and communicated clearly to staff, partners, children and their communities, in a language they understand. Within Save the Children, Child Safeguarding is making Save the Children safe for children. It is our individual and collective responsibility to ensure all children are protected from deliberate or unintentional acts that lead to the risk of, or actual, harm caused by Save the Children staff, representatives, partners, volunteers, contractors and visitors to our programmes.

2. Policy Scope

Save the Children Canada defines a child as anyone under the age of 18. All Save the Children staff, board members and all others involved in the work of Save the Children must act in accordance with this policy in both their professional and personal lives, without exception, this includes:

- All Save the Children Canada employees and agency workers
- Board members, volunteers and trainees ('representatives')
- The policy also applies to secondees, interns, and third parties connected with SCI, including partners, implementing partners, consultants, contractors, and all visitors to Country Offices
- This policy covers all aspects of Save the Children Canada day-to-day operations of emergency responses, humanitarian programs, developmental programs, policy and campaigning work.

3. Policy

This policy covers all forms of child abuse. Save the Children Canada recognises five categories of child abuse, which are sexual abuse, physical abuse, emotional abuse, neglect and exploitation. Other sub-categories may be adopted from time to time. The policy also covers any poor safeguarding practice.

Save the Children Canada is aware that there may be additional vulnerabilities facing children associated with their age, socio-economic background, disability, gender, racial heritage, religious belief, identity, sexual orientation or identity, and is committed to ensuring this does not form barriers to effective safeguarding.

Save the Children Canada will take all reasonable steps to make itself safe, both as an organisation and in the conduct of all aspects of its day-to-day operations of emergency, humanitarian, developmental, policy and campaigning work.

Humanitarian workers and other representatives of INGOs, such as Save the Children Canada, are placed in a position of special trust by the populations they serve. When that trust is exploited and standards for safeguarding children fail, immense damage is caused with long-term effects on the lives of children and their families, and implications for the credibility and reputation of the organisations involved. Save the Children Canada has a zero-tolerance approach to child abuse and sexual exploitation of children by our staff, our partner's staff and those who represent us.

Save the Children Canada's Child Safeguarding system is made up of four key areas: Awareness, Prevention, Reporting and Response. Each of these areas has activities that continue throughout the life cycle of our development and humanitarian work in the countries we operate in either directly or through partners. We adopt a child centred approach to child safeguarding.

Recruitment, on boarding and training of new employees

Safer recruitment: Save the Children Canada ensures its recruitment processes are rigorous, in line with statutory requirements and best practice guidance. These processes include the use of vulnerable sector police checks where available on all employees, and checking three references.

SCC reserves the right to terminate contract negotiations or refuse to engage an individual, if appropriate criminal record checks are not undertaken, or cannot be undertaken for roles that are identified as working with or having contact with children. This will also apply in the event where background and reference checks reveal that the person is not suitable to work with Save the Children Canada or has omitted key information.

All staff, board members, volunteers and interns are required to complete mandatory Child Safeguarding training within a designated time period from joining the organisation and attendance is recorded.

Staff are required to complete mandatory safeguarding on-line awareness training within the first working week, with an additional face to face training provided within the first 90 days or prior to travelling to the field and having direct contact with children in our project areas;

Dissemination/Awareness Raising

- Save the Children Canada will ensure the Child Safeguarding Policy, Code of Conduct and reporting procedures and mechanisms are made widely available and publicised to children in programs, their carers, all staff, partner staff and all relevant third parties and stakeholders and in a language and format, they understand.
- All visitors to SCC programs or SCI country offices who will have contact with children will be made aware of the SCC Child Safeguarding Policy, relevant procedures and Code of Conduct and the behaviour and conduct expected of them.

Ensuring our work is safe for children through Safer Programming

Safer Programming is a crucial element of our child safeguarding approach and commitment to 'Do No Harm' as a result of the initiatives and activities within all of our programmes and humanitarian responses. This includes our media, advocacy and campaigns work. All areas of work must be resourced appropriately to prevent, mitigate and manage the risk of abuse, exploitation and harm to children at every stage of the project cycle.

Save the Children Canada will, as far as possible, provide a safe physical environment for children by applying health and safety measures in accordance with relevant law and regulatory guidance. We will comply with the relevant industry/sector standards and promote good practice within all thematic areas in which we work.

This will be achieved by:

- Ensuring risks to children's safety and well-being are identified and assessed and managed from program design to exit;
- Carrying out risk assessments for activities involving children or those, which have a direct impact on children. This includes any construction carried out by SCC or a third party on SCIs behalf, research, advocacy and media campaigns and events and travel involving the participation of children;
- Ensuring child friendly reporting response and feedback mechanisms are in place;
- Integrating child safeguarding into the project planning and management cycle, including monitoring, evaluation, accountability and learning;
- Child safeguarding forms part of Save the Children's thematic 'common approaches' which set out our best understanding of how to solve a particular problem for children and improve our quality and impact for children;
- Child safeguarding is integrated into all of our functions including, but not limited to, programme quality and impact, operations, supply chain, logistics, IT, Awards, Human Resources, safety and security, partnerships, advocacy, campaigns, media and communication; resources for child safeguarding are included in every program design, project proposal and budget

Comprehensive Safeguarding Risk Assessment from 'design to delivery and exit' for all programmes, projects and humanitarian responses. This includes working with and through partners.

No program, project or proposal will be approved until a thorough safeguarding risk assessment has taken place which will include:

Step 1: Identifying the level of contact with children;

Step 2: Identifying the risks to children inherent in the thematic areas of work/ approaches, operational procedures and systems and delivery of activities;

Step 3: Assessing the individual program, project or organisation's focus on children;

Step 4: Assessing the strength of safeguarding systems already in place, including appropriate training and application and embedding of relevant policies and procedures;

Step 5: Assessing the potential risk posed by the individual program/project or organisation, identifying mitigating factors as the result of Steps 3 and 4;

Step 6: Establishment of the overall contextual safeguarding risk and a decision to proceed or not;

Step 7: Resource Plan and agreements to mitigate and manage risks;

Step 8: Monitoring of any action plan and/or agreement in place within the programme, project or partner.

Reporting and Investigations

- Save the Children Canada is committed to a robust reporting and investigation procedure which leads to timely and effective reporting and investigation involving the right internal or external professionals
- All staff, partner staff, implementing partner staff, contractors, visitors and volunteers are mandated to report any suspected child safeguarding incidents or concerns to the SCC Child Safeguarding Lead or Focal Point; and Child safeguarding concerns involving criminal conduct reported to the relevant statutory authority unless to do so would place the child at additional risk of harm or there is another justifiable risk in reporting
- There is no threshold for reporting a child safeguarding concern as described in this policy. Any concern, however minor, must be reported;
- All suspected or actual incidents are to be reported as a matter of urgency and always within 24hrs of a person becoming aware of the incident;
- Save the Children Canada is responsible for notifying donors as per their contractual requirements;
- Non-SC staff can report verbally or in writing through local reporting procedures;
- Taking no appropriate action when there is a concern regarding the welfare of a child is not an option; SCI staff, trustees and all others involved in the work of SCI including but not limited to secondees, volunteers, interns, and third parties connected with SCI recognise that the failure to report is a breach of the Child Safeguarding Policy.

Poor Safeguarding Practice

Poor safeguarding practice takes place whenever staff or any other person fail to provide the standard of care and support expected and directed by policies, procedures and training delivered by SCC. Poor safeguarding practice can occur through non-compliance with policies and procedures and when staff and third parties to whom this Policy applies ignore the rights and welfare of beneficiaries. Continued poor safeguarding practice may cause harm and can become abuse.

SCC takes poor safeguarding practice seriously and deems it unacceptable. Poor safeguarding practice must be reported. All reported cases of poor safeguarding practice will be dealt with in line with SCC safeguarding policies and/or disciplinary processes.

Examples of poor safeguarding practice include:

- When insufficient care is taken to prevent harm;
- Allowing abusive or concerning practices to go unreported;
- Placing children or young people in potentially compromising and uncomfortable situations with adults, including through the use of technology/social media
- Ignoring health and safety guidelines

Humanitarian Responses

Save the Children Canada has a commitment to protecting people affected by natural disasters and human-induced crises and to prevent and reduce the violence, exploitation and deprivation faced by people in such situations.

Save the Children Canada recognises that children living in areas affected by humanitarian crises are particularly vulnerable. All organisations and third parties implementing Save the Children Canada's disaster risk reduction and humanitarian preparedness and response activities must assess safeguarding risks, apply, and build on this policy's minimum child safeguarding requirements. Development and implementation of humanitarian response strategies and activities must identify, mitigate and manage child safeguarding risks. This includes safer recruitment and safer programming approaches.

Online Safeguarding

Save the Children Canada believes that online safety is an essential part of safeguarding. Save the Children Canada will enable internet content filtering and evaluate other online safety mechanisms periodically to ensure that this policy and any linked policies are consistently applied.

Save the Children Canada will, as far as possible:

- Identify approaches to educate and raise awareness of online safety throughout our programs
- Enable all staff to work safely and responsibly, to role model positive behaviour online and to manage professional standards and practice when using technology;
- Identify clear procedures to use when responding to online safety concerns;
- Save the Children Canada will develop, where appropriate, project interventions that can influence online behaviour change, teach resilience and promote prevention, in addition to providing general guidance on online safety where possible. Save the Children Canada's mandatory 'Child Safeguarding Procedures' must be followed at all times.

Relevant Laws & Endorsements

This policy will be implemented in accordance with:

- The United Nations Convention on the Rights of the Child (UNCRC), The UN Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13) and other applicable international treaties, laws, and conventions.
- All relevant Canadian laws protecting children from abuse, violence and harm and those outlining measures for reporting known or alleged cases of abuse;
- Applicable laws within the countries where Save the Children Canada operates

Data Protection

Compliance with data protection law and policies must be central to all our processing of children's personal data. All Save the Children Canada staff, representatives and third parties collecting children's data on Save the Children Canada's behalf or in relation to any of our work must adhere to Save the Children Canada policies, procedure and practice or ensure their own mechanisms comply with legal requirements for data protection.

Reporting to the Board

All serious child safeguarding cases will be reported to the Save the Children Canada Board at their board meetings.

Roles and Responsibilities

All staff, representatives of Save the Children Canada and third parties connected with Save the Children Canada must demonstrate the highest standards of behaviour and conduct towards children both in their private and professional lives. They have a responsibility to understand and promote the Child Safeguarding Policy, procedures and the Code of Conduct. They must do all that they can to prevent, report and respond immediately to any child safeguarding concerns.

Unacceptable behaviour and conduct' refers to committing any acts of physical, emotional or sexual abuse, neglect or exploitation of a child and putting them at risk of deliberate or unintentional harm; non-compliance with policies and procedures and failing to take appropriate action to prevent or report any violations and poor safeguarding practice. It is the responsibility of every individual contracted or associated with Save the Children Canada's work to make sure incidents that breach the Save the Children Canada Child Safeguarding Policy, Code of Conduct and other related policies are reported and recorded through the appropriate mechanisms.

Save the Children's Board, including a Safeguarding Trustee, and the **Senior Leadership Team**, will ensure that adequate steps are taken to best reflect the cost of implementing this policy in operational plans, budgets and funding proposals. This includes:

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

Save the Children Canada commits to:

- Valuing and listening to all children and young people;
- Ensuring that all staff and people directly associated with our work understand their personal responsibility to prevent and report any form of child abuse and sexual exploitation of children;
- Diligently implement our child safeguarding system by applying relevant policies, procedures, training and other learning opportunities across Save the Children and with our partners and relevant third parties;
- Ensuring that the organisation creates the right culture and a safe and trusted environment for anyone to report child safeguarding incidents and/or concerns verbally or in writing and through child friendly and accessible mechanisms;
- All safeguarding actions and decisions are taken in the best interests of the child and put the safety and welfare of the child first;
- Reporting suspected or known child safeguarding concerns, violations of this policy and Code of Conduct through the Save the Children incident reporting system within 24 hours of the incident

coming to Save the Children's attention. Local reporting requirements for child abuse and potential criminal offences also apply and should be done in accordance with applicable legal standards;

- Ensuring that detailed and accurate records of all safeguarding concerns are collected, processed and stored securely, in accordance with the relevant data protection laws;
- Implement systems and processes to ensure we do not knowingly employ or contract anyone who poses a risk to children or brings them into contact with children connected to Save the Children;
- Applying the safeguarding components as set out within the partnership procedures and tools;
- Addressing failure to comply with this policy without delay, which may ultimately result in termination of contracts or agreements, including dismissal;
- Prompt reporting of serious child safeguarding incidents to law enforcement agencies and regulators as required.

Definitions

Child Safeguarding (Save the Children's definition)

Child Safeguarding is making Save the Children safe for children. It involves our collective and individual responsibility and actions to ensure that all children are protected from deliberate or unintentional acts that lead to the 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 programme implementation, work through partners and management of children's personal data.

Child Everyone under the age of 18

Child Abuse

Child abuse consists of anything, which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of a safe and healthy development into adulthood.

Physical Abuse

Physical abuse is the non-accidental use of physical force that deliberately or inadvertently causes a risk of/ or actual injury to a child. This may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing non-accidental physical harm to a child. Physical harm can also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness or temporary, permanent injury or disability of a child.

Neglect

Neglect includes but is not limited to failing to provide adequate food, sufficient or seasonally appropriate clothing and /or shelter.

Neglect is also failing to prevent harm; failing to ensure adequate supervision; failing to ensure access to appropriate medical care or treatment or providing inappropriate medical treatment (e.g. administering medication when not authorized); or failing to provide a safe physical environment (e.g. exposure to violence, unsafe programming location, unsafe sleeping practices, releasing a child to an unauthorized adult, access to weapons or harmful objects, failing to child-proof a space that children will occupy etc.). It can also be SCI staff, partners, contractors and sub-grantees failing to apply minimum requirements as set out in mandatory procedures.

Emotional Abuse

Emotional abuse involves doing harm to a child’s emotional, intellectual, mental or psychological development. This may occur as an isolated event or on an ongoing basis. Emotional abuse includes but is not limited to any humiliating or degrading treatment (e.g. bad name-calling, threats, yelling/screaming/cursing, teasing, constant criticism, belittling, persistent shaming etc.), failure to meet a child’s emotional needs, and rejecting, ignoring, terrorizing, isolating or confining a child.

Sexual Abuse

Sexual abuse is the involvement of a child in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Adult males do not solely perpetrate sexual abuse. Women can also commit acts of sexual abuse, as can other children.

Cross Reference Policies/Procedures and Related Documentation

Code of Conduct

Anti-harassment and Anti-discrimination – Respect in the Workplace Policy and Procedure

Talent Acquisition and Retention Policy and Procedure

Investigation Guidelines

SCI Safer Programming Procedure and Guidelines

SCI Social Media Policy

SCI Image Guidelines

SCI Child Safeguarding Media and Communications Guidelines

SCI Child Safeguarding in Humanitarian Procedure

SCI Partnership Procedures and tools

SCI Child Safeguarding Minimum Requirements Framework

SCI Child Safeguarding in Humanitarian Procedure

SCI Partnership Procedures and tools

SCI Child Safeguarding Procedure

UN Secretary General’s Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13 <http://www.unhcr.org/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protection-sexual-exploitation.html>)

• **Policy Revision History**

| Version | Summary of Changes | Revised By | Revision Date |
|---------|--|---------------|---------------|
| 2019 | Updated policy and alignment with PSEA | Carol Tisshaw | August 2019 |