



CHILDFUND  
INTERNATIONAL  
CHILD SAFEGUARDING  
POLICY AND  
PROCEDURE

POLICY GHR-POL-080  
PROCEDURE GHR-PRO-080

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# Policy Document

## Purpose

1.1 ChildFund International strives to promote and safeguard children's best interests, and with this policy, it aims to prevent and respond to any actions and omissions, whether deliberate or inadvertent, among its practices, policies or processes that would expose children to the risk of any kind of Child Abuse. This policy applies to all ChildFund International representatives and guests who have direct access to children or child data.

**ChildFund International has zero tolerance for Child Abuse.**

## Policy

### Safeguard Children

ChildFund International is committed to safeguarding the interests, rights and well-being of children with whom it is in contact, and to conducting its programs and operations in a manner that is safe for children. All ChildFund International representatives are prohibited from engaging in any activity or omission that may result in any kind of child abuse.

All ChildFund International representatives are expected to conduct themselves in a manner consistent with this commitment. Any violations of this policy will be treated as a serious infraction and will result in disciplinary action, up to and including termination, and any other legal response.

In furtherance of this policy, ChildFund International has adopted procedures to promote:

#### 2.1.1 Preventing Child Abuse:

Minimize risks to children through awareness, good practice, and training, and take steps to protect children who are subjects of concern.

#### 2.1.2 Reporting Child Abuse:

Ensure that all representatives know the steps to take and whom to contact when concerns arise regarding the safeguarding of children.

#### 2.1.3 Responding to Child Abuse:

When concerns arise regarding a child's well-being, employ actions that support and protect them and those who raise such concerns, investigate or cooperate with any subsequent investigation and take appropriate corrective actions to prevent the recurrence of such concerns.

#### 2.1.4 Promoting Awareness of Child Safeguarding Obligations:

Ensure that all representatives are adequately trained and supported in preventing and responding to child safeguarding concerns and are aware of the expectations of this policy.

ChildFund International will take all reasonable steps to make the organization safe as it conducts its routine operations, program implementation, policy, and campaigning efforts.

### 2.2 Laws and Regulations:

It is ChildFund International's policy to ensure compliance with either host country local child welfare and protection legislation or international standards, whichever affords greater

protection, and with U.S. law where applicable. The requirements of this Child Safeguarding Policy are in addition to any other applicable legal requirements, including but not limited to donor requirements.

### 2.3 Sexual Activities with Children:

ChildFund International's policy defines anyone who is under the age of 18 as a child and considers them to be underage regardless of the legal age of consent of the country in which s/he lives and/or in which the offense occurs. An underage child cannot legally give informed consent to sexual activity. Consensual sexual activity with a child as defined by this policy will be treated as a serious infraction and result in disciplinary action up to and including termination and the pursuit of other legal response. Engaging in sexual activities and fraternizing with any children or program participants older than 18 who are enrolled in ChildFund Sponsorship or other program activities will similarly be considered an infraction of this policy and subject to disciplinary action that may result in termination.

### 2.4 Accountability of ChildFund International's Management:

ChildFund International's management is committed to taking all appropriate corrective action in response to any violation of the Child Safeguarding Policy, including disciplinary, legal or other applicable actions, against any representative who has committed the violation and/or any representative who knew of such a violation and failed to act on or report it.

### 2.5 Confidentiality of Child Information:

ChildFund International representatives will manage child records and sensitive information in a manner that is respectful, professional, confidential, and compliant with applicable laws. Child information and imagery will be used only with consent.

ChildFund International representatives who report, receive or investigate suspected Child Safeguarding incidents will keep all information strictly confidential and may divulge that information only to child safeguarding focal points in the affected country and their management in global operations (Country Directors), global assurance, legal, child safeguarding investigators, global human resources and/or other senior staff directly involved in the investigation, except as may be required by law.<sup>1</sup>

### 2.6 Partnerships and Project Management:

ChildFund International acknowledges that the work we do is associated with child safeguarding risks and expects that agreements with Local Partners and Business Partners define child safeguarding responsibilities. During the term of the Letter of Agreement with all Local Partners, they must maintain and adhere to their own child safeguarding policy that is consistent with and no less stringent than the Child Safeguarding policy of ChildFund International. It shall be the sole responsibility of the Local Partner to ensure its awareness, training, and compliance with its child safeguarding policy.

ChildFund International's programs must conduct a risk assessment in which child safeguarding risks are considered.

### 2.7 Supporter Relationships:

ChildFund International has an active supporter relationship program that encourages communication between children and supporters. ChildFund takes appropriate steps to ensure that these communications take place in a safe environment and to reduce risks for children by educating them on safe and appropriate communication with adults.

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<sup>1</sup> Fundraising Policy POL-FE-002, Global M&E Policy, Record Management Policy, Social Media Policy

## 2.8 Humanitarian Emergencies:

ChildFund International is committed to reducing children’s vulnerability during emergencies and ensuring their right to survival and development, as well as their rights of protection and to be heard (participation) during and after an emergency, through this policy and the associated procedures and by employing the standards defined in Keeping Children Safe: Safeguarding Children in Emergencies.<sup>2</sup>

## 2.9 Safe Recruitment:

By applying robust recruitment procedures, ChildFund International will take all reasonable precautions to ensure that our staff and representatives do not pose an unacceptable risk to children.

## 2.10 Education & Training:

ChildFund International will provide all new representatives with a child safeguarding briefing in which they will be introduced to the Child Safeguarding Policy and Child Safeguarding Procedures within 7 days of commencement. Refresher training on this policy and procedures will be provided annually. Specific functions will be provided additional training as required and, on an ad hoc basis.

## Definitions

3.1 **Child:** A child is anyone under the age of 18<sup>3</sup>.

3.2 **Child Protection:** The protection of children from all forms of abuse and exploitation everywhere; making the world safe for children.

3.3 **Child Safeguarding:** The responsibility of ChildFund International to make sure our representatives, guests, operations, and programs keep children safe and do not expose them to violence, abuse, neglect, or exploitation while in our care. It is our collective and individual responsibility to ensure that all children are safe from deliberate or unintentional acts that lead to possible or actual harm by a ChildFund International representative or guest who comes into contact with children or their data or who impacts them through our operations.

3.4 **Child Abuse:** Anything that individuals, institutions, or processes do or fail to do that directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood. The main categories of Child Abuse are Physical Abuse, Emotional Abuse, Sexual Abuse, Sexual Exploitation, Exploitation, and Neglect/Negligent Treatment.

3.4.1 **Physical Abuse:** Intentional use of physical force by another person that causes actual or likely physical injury or suffering (e.g., hitting, shaking, burning, female genital mutilation, torture).

3.4.2 **Emotional Abuse:** Harm to a child’s emotional, intellectual, mental, or psychological development, including humiliating, degrading, or intimidating treatment (e.g., bad name

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<sup>2</sup> Based on Keeping Children Safe definition

<sup>3</sup> In line with the UNCRC, Article 1

calling, constant criticism, persistent shaming, threats, solitary confinement and isolation), failure to meet a child’s emotional needs, rejection, ignoring, confining or terrorizing a child.

**3.4.3 Sexual Abuse:** The use of a child in a sexual act by another person, including indecent touching, voyeurism, and exhibitionism. Sexual abuse includes incest, early and forced marriage, rape, involvement in pornography, and sexual slavery. Sexual abuse includes forcing or enticing a child to take part in sexual activities, including the act of grooming a child with the intention of establishing a sexual relationship.

**3.4.4 Sexual Exploitation:** A form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family need<sup>4</sup>. The terms “child prostitution” and “child sex tourism” describe forms of sexual exploitation. Sexual exploitation also includes the exchange of sex for benefits from ChildFund International programming. Sexual exploitation also includes Online Sexual Exploitation and Abuse of Children (OSEAC), which is the production, for the purpose of online publication or transmission, of visual depictions (e.g. photos, videos, live streaming) of the sexual abuse or exploitation of a minor for a third party who is not in the physical presence of the victim, in exchange for compensation.

**3.4.5 Exploitation:** The actual or attempted abuse of a position of vulnerability, power differential, or trust for the benefit of the individual by leveraging their position, power, privilege, or wealth (through incitement, manipulation, coercion, or trickery) to engage a child in labor, domestic servitude, forced criminality, soldiering or organ harvesting. Typically, the person(s) exploiting a child does so to profit monetarily, socially, or politically. Exploiting a child in work or other activities is a violation of their rights and an injury to the child’s physical or mental health, education, moral or social-emotional development. The exploitation of a child may include but is not limited to:

3.4.5.1 Domestic servitude (does not include home chores).

3.4.5.2 Forced labor (commonly in factories or agriculture).

3.4.5.3 Forced criminal activities (pickpocketing, begging, drugs, and counterfeiting-related crime).

3.4.5.4 Forced conscription or joining of a gang.

3.4.5.5 Use for benefit fraud.

**3.4.6 Neglect/Negligent Treatment:** Persistent failure to meet a child’s basic physical and/or psychological needs; for example, failing to provide adequate food, clothing and/or shelter; failing to prevent harm; failing to ensure adequate supervision; failing to ensure access to appropriate medical care or treatment; and failing to provide a safe physical environment (exposure to violence, unsafe programming locations, unsafe sleeping environment; releasing a child to an unauthorized adult; access to weapons or harmful objects, etc.).

**3.5 Grooming:** The process in which an adult builds a relationship with a child or a child’s caretaker to gain the child’s or caretaker’s trust for the purposes of sexually abusing and/or exploiting the child. Grooming typically occurs in phases, and it can happen online or face to face, by a stranger or by someone the child or caretaker knows. Since it is a gradual process, it can sometimes be difficult to detect.

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<sup>4</sup> Based on Keeping Children Safe definition



### 3.6 Child Safeguarding Incident<sup>5</sup>

3.6.1 Gross violation of children’s right to shelter from harm, including but not limited to any form of violence, sexual exploitation, neglect, or abuse, which may include serious physical or psychological harm, injuries, or death.

3.6.2 Any violation of ChildFund International’s safeguarding policy that puts children at direct risk of harm.

3.6.3 Any death or serious injury of a child who is under ChildFund International’s temporary care or participating in a ChildFund activity, or that is caused directly by ChildFund staff or an affiliate.

**3.7 Children’s Sensitive Information:** This is any information that can be used to trace a child’s identity, including their name, image or photograph, address, government-issued identification number, date and place of birth, mother’s maiden name, biometric records, and any other information that is linkable to that child, such as medical, educational, financial or employment information, including responses to surveys or questionnaires that may be linked back to an individual child or family member. This also includes paper or electronic information as described above and is Personally Identifiable Information (PII) collected for programmatic or operational purposes.

**3.8 Representative:** Includes employees, volunteers, interns, consultants, Board members, and others who work with children on ChildFund International’s behalf, visit ChildFund International programs and have direct access to children or sensitive information about children in our programs.

**3.9 Partner Organizations:** Any organization that partners with ChildFund International to implement a project, irrespective of whether the organization receives financial assistance from ChildFund International to carry out the project; this includes local partners.

**3.10 Business Partners:** Contractors, sub-contractors, suppliers, and vendors. This policy applies to business partner with direct access to children or children’s sensitive information. All others are encouraged to commit to the protection of children in their business operations. ChildFund International will give special consideration to business partners who demonstrate through their internal policies and practices their commitment to keeping children safe.

**3.11 Guest:** Any non-employee, non-representative invited to visit programs or participate in an event or activity where children whom ChildFund International supports will be present, such as the media.

**3.12 Supporters:** Supporters include sponsors, individual donors, and visitors or guests.

**3.13 ChildFund International Senior Managers:** Senior Managers are defined as those staff who are members of Senior Management Teams at the Country, Regional, and International Offices. These positions are most likely to be titled “Director,” “Manager,” “Chief,” “Vice President,” or “President/CEO.”

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<sup>5</sup> Child Safeguarding Definition and Incident level adapted from Joining Voices Reporting Protocol.

**3.14 Public Communication:** Dialogue in the public sphere to deliver a message to a specific audience. Speaking events, newspapers, editorials, advertisements, email, social media and all forms of public communication.<sup>6</sup>

**3.15 Social Media:** Forms of electronic communication and content used to share information publicly. Comments, messages, images, video and other content delivered via social networks.

**3.16 Ethical standards:** Include the acquisition of informed consent from children and/or young people (and their parents/legal guardians where applicable), through the provision of all necessary details (including on any associated risk) to make an informed decision regarding their participation in research and MEL activities, including any surveys/interviews, voice recordings, video or photographs of children and/or young people (including how and where these will be used). Participation in and/or usage of research/MEL data should take place only after consent is obtained.

## Responsibilities

This section briefly describes how we apply safeguarding in our work. The accompanying Child Safeguarding Procedures provide in-depth detail of the procedures that different business units within ChildFund International are responsible for.

4.1 All ChildFund International representatives are responsible for familiarizing themselves with and adhering to the requirements of this policy and accompanying procedures. They are required to promote strong safeguarding practices within day-to-day behaviors and programs.

4.2 All ChildFund International representatives have an obligation to be alert for possible violations of this Child Safeguarding Policy and to report violations as soon as possible and not later than 24 hours, including that a child has been abused or exploited or is at risk of being abused or exploited. All representatives must cooperate fully and confidentially in any investigation of concerns or allegations.

4.3 ChildFund International Country Directors, International Office Directors and Managers are accountable for the implementation of ChildFund International's Child Safeguarding Policy and Procedure, including decisions on how best to apply these in the local context.

4.4 The Global Leadership Team and Board of Directors have ultimate responsibility for ensuring the safety of children.

4.5 Research and Monitoring, Evaluation, & Learning (MEL). All ChildFund International research and MEL activities require an ethical review in accordance with the law, donor requirements and/or ethical standards. The review process will ensure compliance with this Policy.

## Exceptions

Any application for exceptions should be sent to and approved by the Vice President, Global Human Resources.

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<sup>6</sup> Place link to social media policy

## Procedures Document

### Purpose

The procedures outlined in this document are intended to describe the practical actions performed by ChildFund International representatives to apply the Child Safeguarding Policy. They provide minimum requirements and guidance for ChildFund International Representatives toward being a safe organization for children and ensuring that appropriate action is taken if a policy violation occurs. Agreements with Partner organizations and Business Partners will define safeguarding responsibilities.

### Definitions

As per the Child Safeguarding Policy: GHR-POL-080

### Responsibilities

All ChildFund International Representatives are responsible for following the Child Safeguarding policy and implement this procedure. All ChildFund International Representatives are expected to remain alert and responsive to any child safeguarding risks, acquire relevant knowledge and skills that will enable them to promote strong safeguarding practices, understand the child safeguarding procedures, and conduct themselves in a manner consistent with them.

All ChildFund International Representatives have an obligation to report violations of this Child Safeguarding Procedure in a timely manner, including that a child has been harmed or is at risk of being harmed, according to the reporting requirements detailed in this procedure. All Representatives must cooperate fully and confidentially in any investigation of allegations.

ChildFund International Senior Management are accountable for the implementation of ChildFund International's Child Safeguarding Procedures, including decisions on how best to apply the procedures in the local context.

The Global Leadership Team and Board of Directors have ultimate responsibility for ensuring the safety of children.

Every ChildFund office will appoint a Child Safeguarding Focal Point who will support programs and operations to ensure that ChildFund International is safe for children.

Research and Monitoring, Evaluation, & Learning (MEL). All ChildFund International research and MEL activities require an ethical review in accordance with the law, donor requirements and/or ethical standards. The review process will ensure compliance with this Policy.

## Prevention of Child Safeguarding Incidents

### Statement of Intent

ChildFund International will conduct risk assessments for programs and activities involving children or those having a direct impact on children, to ensure that it meets the standards for safeguarding children. Other activities in addition to programming may include but are not limited to research, advocacy, media campaigns and events involving children.

### Prevention of Child Abuse

When conducting risk assessments, consideration must be given to factors such as age, gender, disability, language, culture, and all aspects of inclusion that may affect the risks and vulnerabilities associated with children participating in programs. Migration measures and plans must be implemented to address and minimize these risks.

To ensure that no systems or processes cause harm to children, documented self-assessments must be conducted for all ChildFund International work processes and activities that impact and involve children directly or indirectly.

Two-Adult Rule must be used because it: (1) significantly reduces the risk of an incident of abuse; (2) protects against false accusations; (3) reduces liability and claims of negligence; and (4) offers added support in the case of an emergency.

Representatives must *never*:

- Act in ways that may be abusive or place children at risk of abuse.
- Hit, physically assault, or physically abuse children or threaten to do so.
- Engage in actions that are physically inappropriate or sexually provocative.
- Partake in sexual activities or have a sexual relationship with a child, irrespective of the age of majority or consent or local custom.
- Engage in a sexual relationship or sexual activity with an enrolled person or someone benefitting from a ChildFund program or activity.
- Stay alone overnight with one or more children participating in ChildFund programs who are not a part of their family, whether in their house, on project premises or elsewhere.<sup>7</sup>
- Have a child participant who is not part of their family stay overnight at their home.
- Sleep in the same bed as a child participant or sleep in the same room as a child participant who is not part of their family.
- Exchange personal contact information or ask for children's personal information.
- Call, text or communicate with child participants outside of the project or on a personal basis.
- Develop relationships with children that could be deemed exploitative or abusive.

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<sup>7</sup> Child participants may attend events and travel on behalf of ChildFund International and must be given reasonable accommodations that abide by the Child Safeguarding Policy and this procedure.

- Share or transfer enrolled child or child program participant data outside of ChildFund, without encryption.
- Store enrolled child or child program participant data on a personal device.
- Use language, make suggestions, or offer advice to children that is inappropriate, offensive, or abusive.
- Do things for child participants of a personal nature that they could do for themselves, such as dressing, feeding, and washing.
- Improperly disclose children’s sensitive information.
- Condone or participate in behavior toward children that is unsafe or illegal.

All representatives must know the steps to take and how to report concerns regarding the safety of children. Failure to report a concern, reasonable suspicion or knowledge of misconduct or a violation of the Child Safeguarding Policy will be treated as a serious infraction and may result in disciplinary action.

### Child Safeguarding Focal Point Person

Every ChildFund International Office will appoint a Child Safeguarding Focal Point Person, and in most cases, this will be the Child Protection Specialist. The Child Safeguarding Focal Point Person is integral to the Child Safeguarding framework and will be the primary contact person for coordination and implementation of the policy and procedures and will receive and coordinate the response to complaints about violations of the Child Safeguarding Policy and Procedures. All responsibilities are detailed in the Child Safeguarding Focal Point’s job description.

## Reporting of Child Safeguarding Incidents

### Statement of Intent

All ChildFund International Representatives are required to report alleged violations of the Child Safeguarding Policy and any concerns that a child<sup>8</sup> has been harmed or is at risk of being harmed. All allegations made must be reported and reviewed for appropriate follow-up, including conducting an inquiry when appropriate.

Any allegations of abuse made against Partner Organizations, including Local Partners, will be address by the Partner Organization and monitored by ChildFund International.

The ChildFund International Whistleblower Policy ensures that any Representatives, Partner Organizations, Guests, and Supporters who in good faith report a protection concern will be fully supported.

All reports will be treated as confidential; however, some information may need to be shared on a need-to-know basis in consideration of the child’s best interest, compliance with local laws, etc.

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<sup>8</sup> This relates principally to children in contact with ChildFund International through its work, but also encompasses other children in the wider communities where we work, if we become aware of actual or potential harm to them.

## Reporting

The nature of ChildFund International's work requires all staff to report all Child Abuse concerns, including reasonable suspicion and knowledge of misconduct in accordance with the Child Safeguarding Policy.

If a Child Safeguarding Violation is suspected or known, note that there may be dual reporting requirements - to both local authorities and the ChildFund International Whistleblower reporting system. Not all policy violations will be reported to local authorities, such as failure to use the two-adult rule. The local Child Safeguarding Focal Point or the Director of Safety and Security should be contacted if additional support or instruction is required.

Reports of suspected or known violations to the Child Safeguarding Policy must be submitted within 24 hours of occurrence or learning of the violation. Reports can be made:

- To the Country Director, International Office Department Head, manager, or your supervisor. These resources must notify Global HR or Assurance of the report upon receipt.
- To the local or national child safeguarding focal point. This resource must notify Global HR or Assurance of the report upon receipt.
- Directly through the Whistleblower system online at <http://speakup.childfund.org> or by calling the hotline number provided for your country on that website.
- By email at [complaints@childfund.org](mailto:complaints@childfund.org).

The report should include:

- Date, time, and place of the incident.
- Nature of the violation - what happened?
- Actions taken at the time of the report to keep the child(ren) safe - what been done?
- Help or actions needed?

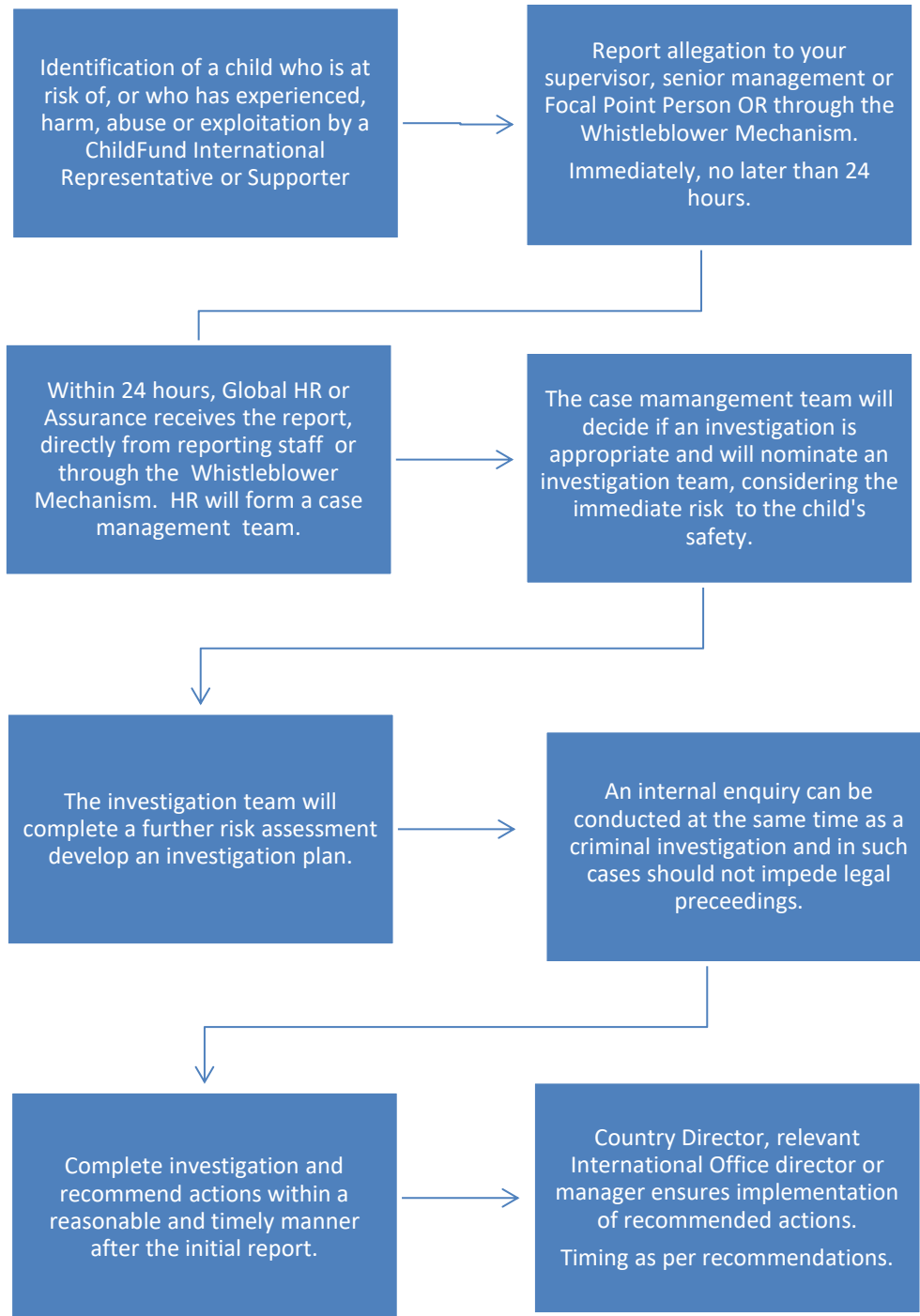
The Director of Global Assurance reports the number of child safeguarding complaints received and their outcome to the President and CEO, VP Global Operations, CFAO, and Audit Committee of the Board of Directors three times a year. General counsel will report the number of cases to the Board on an annual basis.

## Self-Reporting an Allegation

If an allegation is made against you, directly to you, you should make a written record of the allegation and advise your manager and/or the Child Safeguarding Focal Point Person immediately. The Child Safeguarding Focal Point Person will inform Human Resource Business Partner. Possible situations that should be reported include such things as:

- You accidentally hurt a child, or a child is harmed in any way.
- A child appears to be sexually aroused by you.
- A child misunderstands or misinterprets anything you have done in a way that could be construed as a breach, or potential breach, of the policy.
- You are involved in activities that might be misconstrued as a breach of the Child Safeguarding Policy.

## How to Report an Allegation of Harm of a Child<sup>9</sup>



<sup>9</sup> ChildFund International can offer advice and support to partners to ensure that their investigations are conducted responsibly and do not cause further harm.

## Responses to Policy Breaches<sup>10</sup>

Each country office and international office departments (per CEO Management Teams) will appoint Child Safeguarding Focal Points who are responsible for supporting the Child Safeguarding Policy's direct implementation or implementation through partners in a continued effort to ensure that ChildFund International is safe for children.

There are different potential breaches of the ChildFund International Child Safeguarding Policy:

The steps to report and investigate policy breaches will vary depending on who is alleged to have done something and the nature of the act.

1. Allegations that a ChildFund International Representative, Supporter, has abused, harmed, or exploited a child.
2. Allegations that a ChildFund International Representative or Supporter has breached the Child Safeguarding Policy but has not abused, harmed, or exploited a child. Examples include failure to provide safeguarding information on a job advertisement, not conducting a pre-visit briefing for a visitor, not storing children's data with a password on IT equipment and using ChildFund International's IT network to look at pornography. While a child in contact with a ChildFund International program has not been directly abused, harmed, or exploited, the policy has been breached and safeguarding risks exposed.
3. Concerns about a child not enrolled in ChildFund International but who may live in a community reached by ChildFund International or have some other connection that makes a ChildFund International Representative concerned about the child's safety.

These different types of allegations are responded to in different ways:

1. Internally managed: ChildFund International Representatives and Supporters who will directly interact with enrolled children sign an agreement of acceptable behavior based on our Child Safeguarding Policy and Procedures, to show they have received and understand them. Any allegation about a Representative or Supporter is managed internally by ChildFund International. This allegation triggers an investigation that is coordinated by a case management team, overseen by the Vice President, Global Human Resources and carried out in coordination with the country office, international office department head (of the staff member who the allegation is made against) or Child Safeguarding Focal Point Person, and the Director of Safety and Security (hereafter referred to as the Case Management Team). The investigation may refer the allegation to local authorities.

## Internal Management of Allegations of Harm to a Child

### *Reporting Principles*

- The child's best interests are paramount, and the child's interests will be central to the reporting process and response.
- Any response should be informed by a risk assessment of the situation and consideration to additional threats that may exist.

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<sup>10</sup> These procedures equally apply to the Counter-Trafficking in People Policy



- Appropriate support will be provided to the child during and following any investigations, including working with the family where this is in the child's best interests.
- Confidentiality is a critical part of the process, and information will be shared only on a need-to-know basis. The child will be informed prior to any information about them being shared.
- The safety and well-being of persons making reports and those involved in the investigation are important.
- ChildFund International will not tolerate retaliation, harassment, or victimization against its Representatives, Supporters, Business Partners and Partner Organizations for reporting concerns or complaints in good faith and in line with the Whistleblower Policy.
- All records of investigations will be retained and disposed of per Privacy, Confidentiality and Security of Sensitive Information procedures.

#### **Internal Investigations of Other Breaches of the Child Safeguarding Policy**

Breaches of the Child Safeguarding Policy that do not involve allegations of harm to a child in contact with ChildFund International, such as failure to include safeguarding questions in interviews, will be responded to in the same way as allegations of harm, and the same reporting process for a breach concerning harm to a child will be followed. Examples of breaches that do not directly involve harm to children include but are not limited to:

- Lax employment screening
- Inconsistent risk assessments
- Not obtaining informed consent from parents for use of child images and data
- Lack of safe storage of child records
- Not following the two-adult rule

2. Externally managed: ChildFund International Partner Organizations and Business Partners are governed by their own Child Safeguarding Policy. Allegations received by ChildFund International will be reported to the Partner Organization or Business Partner, and the investigation will be managed by the partner. Partner Organizations are required to inform ChildFund International of allegations received, which implicate their organization, within 24 hours. Specifically, they will inform the ChildFund International Child Safeguarding Focal Point Person, Senior Manager or Country Director, who in turn will immediately notify the Vice President, Global Human Resources of the allegation for incident tracking and reporting purposes and to determine if there are support requirements. The Country office will work with Global Human Resources to identify any actual or potential risks to the child and ChildFund International. Risk management actions are to be agreed to and put in place.

For allegations made against one of our own representatives, we take direct responsibility. However, when an allegation is against a person connected to a partner, the partner is responsible for acting. ChildFund International will advise and assist in that process if needed; either way, we require the partner to inform us of the result of their investigation. If we are to remain their partner, we have an interest in ensuring that their investigation is conducted safely, fairly, and objectively and their conclusions are reasonable. But we must also be clear — if we become aware of a child being harmed by a person not connected to us or a partner, we still have an obligation to act.

The Partner Organization will investigate the allegation following their procedures. In cases where the Partner does not have a strong investigation ability, ChildFund International will provide advice and assistance to ensure a safe investigation process is followed. The ChildFund International Focal Point Person is responsible for monitoring the progress of the Partner’s investigation and conclusion and keeping VP Global HR informed about that. The Partner will send a summary report of their investigation’s outcome to ChildFund International, and a copy will be shared with Global Assurance for their awareness, global reporting requirements and record purposes. Any final risks management actions will be identified and acted upon.

3. If ChildFund International becomes aware of allegations of abuse, harm or exploitation of a child not enrolled with ChildFund International that are not against a ChildFund Representative or partner, the organization has a duty to refer the allegation to the local authorities. The child will be referred to local support services, if required, which may include the community-based child protection committee. ChildFund International will follow up to ensure a satisfactory conclusion.
4. When the Case Management Team is satisfied that the child is no longer at risk of abuse, harm or exploitation and the allegation has been investigated and a conclusion reached, including taking disciplinary action as appropriate, the case can be closed. The Director of Global Assurance should be provided with appropriate documentation and information so that the status can be updated and closed in the system. The case may remain open within the local authority and support services.

## Privacy, Confidentiality and Security of Sensitive Information

### Statement of Intent

ChildFund International will manage children’s sensitive information in a manner that is respectful, professional, confidential, and compliant with applicable laws and standards and includes storage, retention, handling (including transmission) and disposal of children’s sensitive information.

Maintaining the confidentiality and security of children’s information applies to all of us!

### Confidentiality

At all times, confidentiality of children’s sensitive information is to be maintained. This includes information on children, as well as information relating to any alleged cases of child abuse, neglect, or exploitation, including information on alleged or actual perpetrators. In certain circumstances, any lack of confidentiality may have devastating effects for children.

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.

### Security of Children’s Sensitive Information

Parents or caregivers are required to give informed written consent prior to ChildFund’s gathering, storing, or sharing children’s sensitive information. Standards that govern the safe storage, retention, handling (including transmission) and disposal of children’s sensitive information (including all sponsorship communications, images and consent forms, information relating to child safeguarding incidents, investigations, and reports) must be in place. Children and their caregivers may have access and review information held about them.

At the end of a partnership, all children’s sensitive information held by the Partner Organization is returned to ChildFund International and will be securely archived or disposed of.

When sharing enrolled and program participant children’s sensitive information outside of ChildFund International, the transfer should be encrypted.

## Child Safeguarding Risk Assessment

### Statement of Intent

A Child Safeguarding risk assessment enables actual or potential risks to be identified and mitigating actions to be built into work processes and program design and delivery to minimize the likelihood that children will experience harm during their contact with ChildFund International. ChildFund International conducts Child Safeguarding risk assessments that cover all the organization’s activities that may impact children directly or indirectly.

### Child Safeguarding Risk Assessments - Program Focus

Documented risk assessments are to be conducted when designing programs and activities. Aside from the regular project activities that children may be involved in, additional risk assessments are required for special events, such as research projects, travel, Child Safeguarding investigations, or overnight trips involving children.

The assessment of risk and its mitigation should be part of the ongoing program management cycle, especially when designing projects, and then also when planning and running activities that are part of the project.

Consideration is to be given to factors such as age, gender, disability, and other issues of inclusion that may affect the risks and vulnerabilities associated with children participating in programs. In addition to focusing on safeguarding children from abuse, risk assessments must also cover issues relating to health and safety, such as physical safety of buildings and equipment as well as accident/injury prevention, capacity of partners, legal risks, etc.

Risk assessments are regularly conducted to identify and respond to changing circumstances.

### Child Safeguarding Risk Assessments - Operational Focus

Documented risk assessments are to be conducted across the organization to ensure that no systems or processes cause harm to children. These may include but are not limited to:

- Participation of children in media and communications.
- ChildFund International events and concerts.
- Electronic and paper data collection storage of information on children.
- Use of information technology to restrict access to inappropriate websites.
- Contracting goods and services.

### Mitigation Plans

Once risks have been identified, mitigation plans are put in place to address recognized risks and ensure that all projects and activities are designed to minimize risk of harm to children by taking sufficient account of safety, whatever the focus of the work.

## Safe Recruitment and Selection

### Statement of Intent

ChildFund International is committed to the safe recruitment of Representatives in accordance with applicable employment laws and regulations. All human resource child safeguarding processes are documented to ensure compliance.

## Recruitment

All job descriptions/terms of references include a statement on the position's responsibilities for meeting the requirements of the Child Safeguarding Policy. All jobs are assessed for level of contact with children and data held on children. All jobs working directly with children and/or children's data have child safeguarding responsibilities detailed in the job description along with required skills and experience. Roles that have a higher level of contact with children and/or data will be required to undergo additional child safeguarding checks.

All job advertisements will include a statement on ChildFund International's commitment to child safeguarding.

The safe recruitment and selection of staff is critical, but these same steps — background and reference checks — apply equally to staff, volunteers, interns, and Board members.

## Selection

Selection criteria outline the relevant experience and knowledge needed if the role involves direct work with children and/or children's data. All applicants are required to send a CV or application form, and these are assessed against the minimum requirements of a role.

During interviews for all roles, the ChildFund International hiring manager asks candidates to confirm their willingness to meet the requirements of the Child Safeguarding Policy. Additional Child safeguarding questions are included in interviews for roles working directly with children and/or children's data.

Provisional employment offers are made subject to satisfactory background checks. Prior to making a formal offer of employment, a minimum of two verbal documented references, one of which is to be a former employer or educator, are completed for all staff. The reference checks include a requirement for the referee to state whether the person is suitable to work in an organization that works with children. Any indication that a person is not suitable to work with children will result in an employment offer being withdrawn. Qualifications are checked and photographic identification provided to confirm identity for roles working directly with children and/or children's data.

Where possible, all jobs are also subjected to national criminal background checks. Where criminal background checks are not available nationally, ADP<sup>11</sup> checks are conducted. Any conviction for abuse or neglect of children will exclude a candidate from employment with ChildFund International. Other convictions are considered relative to the job, and decisions are to be made in consultation with Global Human Resources. Staff who are convicted of any crime during their employment with ChildFund International must inform ChildFund International. Failure to do so will result in disciplinary action. Consultants' criminal checks are updated every two years.

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<sup>11</sup> ADP is a US-based company that provides Human Resource management support globally and can conduct background checks globally.

## Onboarding

Within the first week of employment, all new representatives are required to read and acknowledge the ChildFund International Child Safeguarding Policy to confirm they understand the policy and the consequences of violating it. Representatives receive induction training to the ChildFund International Child Safeguarding Policy within 90 days of commencing employment by the Child Safeguarding Focal Point. The review of the six-month introductory period for new employees includes consideration of the employee's compliance with the Child Safeguarding Policy.

It is critical to sensitize new representatives to Child Safeguarding during their onboarding process, so we embed safeguarding into our organizational culture.

## Performance Planning and Evaluation

The Performance Planning and Evaluation meeting includes a review of performance against child safeguarding requirements for the role, ensures that required signoffs and trainings have been conducted, and confirms that the staff has the required knowledge of their technical area and child safeguarding responsibilities.

## Consultants, Volunteers, Interns and Board Members

Recruitment and selection procedures outlined above apply to all consultants, interns, volunteers, and board members. In addition, consultants', interns', and volunteers' contracts include the requirement for them to read and sign the ChildFund International Child Safeguarding Policy, and this is annexed to the consultant or volunteer agreement, as appropriate.

International volunteers may be recruited by organizations that conduct background checks. In that case, ChildFund International must ask for signed confirmation that background checks have been completed. Where the organization does not conduct background checks, ChildFund International is responsible for doing so.

## Training and Development

### Statement of Intent

ChildFund International recognizes that for the Child Safeguarding Policy to be well understood and effectively implemented, it is essential that there is widespread, high awareness regarding the policy and that staff and others are confident and competent in putting the policy into practice.

### Dissemination of the Policy

The Child Safeguarding Policy will be available and translated as needed to all Representatives. All Representatives will know how to report breaches of the Child Safeguarding Policy.

Child-friendly Child Safeguarding information materials, such as posters that include how to report concerns, are made available to children and communities. There are also face-to-face awareness-raising activities, presented during events and activities.

### Annual Refresher Training

Annual refresher training facilitated by the Child Safeguarding Focal Points, is required for all staff to continue building a child-safe culture and embedding a sound understanding of the policy. Training in Country Offices should reflect the local context and be culturally appropriate.

As part of our commitment to Child Safeguarding and to deepening our work around child protection, opportunities to access information and training will become more robust. This also means keeping Focal Point Persons abreast of areas of need and interest.

Managers will brief their teams on child safeguarding and their responsibilities under the policy upon their engagement with ChildFund International. All representatives are trained in accordance with their level of responsibility and contact with children and children's sensitive data. Representatives with a high level of direct contact with children and/or specific responsibilities relating to child safeguarding will receive additional training as organized by the Focal Point Person. Specific training needs are defined by job descriptions and the performance planning process. Managers are required to report training attendance to Global Human Resources for recordkeeping purposes, through the performance evaluation process.

ChildFund International may provide Partner Organizations with access to child protection training, resources, and capacity development to enable them to be compliant with child safeguarding standards and policies.

## Program Design, Implementation and Monitoring

### Statement of Intent

The Do No Harm and Best Interests of the Child principles inform all ChildFund International programs and projects. Ensuring that children are not harmed or put at risk because of the design and delivery of ChildFund programs, projects, events, or activities is critical. All ChildFund International projects and programs must take account of the environment, context, and impact (intended or unintended) on the children and communities they engage with. ChildFund International recognizes that implementing programs and projects in emergency settings may increase the risk of harm to children. To this end, ChildFund International upholds the responsibility of ensuring that emergency operations do not put children at greater risk of harm.

All program designs must be informed by a risk assessment, and Child Safeguarding procedures must be embedded into the project design and implemented throughout the project management cycle.

## Risk Assessment

A risk assessment is an exercise where ChildFund International examines all aspects of our operations from a safeguarding perspective, to establish whether there are any practices, processes or features that have the potential to put children at risk.

The risk assessment process is intended to enable ChildFund International to:

- Identify potential risks.
- Develop policies, practices, and procedures to minimize risk and to respond in a timely manner to potential risks.
- Review whether adequate precautions are in place and have been taken to eliminate or reduce these risks.

At the program development stage, a situational analysis takes place to review the overall context for the program and assess the legal and policy framework, services, and stakeholders in child protection. On this basis, an understanding of the rights and protection environment for children is established to inform strategic and program planning. Children's safe participation in the situational analysis forms part of the assessment process for program design, enabling their views to be considered in the final program. Similarly, consultation with communities and the mapping of existing child protection mechanisms within ChildFund International program areas form part of the risk assessment process and inform the program or project design. Consideration must be given to all threats that could cause harm and must include the health and safety of children.

During emergency responses, additional rapid assessments are undertaken to understand the new and evolving child safeguarding environment.

After the risk assessment has been completed, ChildFund International is required to develop Child Safeguarding practices as outlined in our policy and these procedures, and then to embed them into the program design to reduce and manage the identified risks.

## Program Design

ChildFund International incorporates effective strategies to identify and prevent the risk of harm, including violence, abuse, or exploitation, and to promote child safeguarding in the design of all ChildFund International programs, projects, and activities. Documented programming and risk assessment guidelines and tools are in place, including advice on consulting with children and families and on incorporating child safeguarding throughout the program management cycle.

## Program Implementation

Management and staff are made aware of their specific safeguarding responsibilities. Individuals are recruited, vetted, selected, oriented and trained to ensure that they have the skills to identify, mitigate, and monitor the negative impacts of projects and take steps to safeguard children participating in ChildFund International projects.

Project locations must be safe for children from a health and safety perspective.



Children are briefed on how to stay safe, the standards of behavior they can expect from ChildFund International staff and Representatives, and how to report concerns. A Child Safeguarding Policy is available for all children in a format that is easily understood.

Adequate General Liability insurance is in place for all ChildFund International operations.

### Running Safe Events and Activities for Children

When planning activities, a risk assessment is undertaken to consider potential risks and mitigating actions to be implemented. While undertaking activities with children, ChildFund International Representatives and Partner Organizations continue to assess potential child safeguarding risks arising from activities organized by ChildFund International and Partner Organizations. This ensures that adequate risk mitigation measures are in place, such as appropriate staff-to-child ratios, arrangements for the supervision of children, and protocols for addressing illness, injuries, accidents, or other harms. Care is to be taken to ensure that adequate preparation and preventive measures are in place to safeguard children when activities or events take place in unfamiliar places and outside family care. Adults who represent ChildFund International at events, including volunteers, must acknowledge our Child Safeguarding Policy and Procedures and background checks for those representatives is required.

According to one of ChildFund's peer organizations, one of the single most significant changed practices brought on by child safeguarding was ensuring the two-adult rule — a single staff person is not to be alone with a child or group of children.

### Travel and Overnight Stays

When ChildFund International arranges for children to travel and/or have an overnight stay, the following steps are taken:

- Informed written consent for children to participate in an event is obtained from parents or caregivers.
- An adequate number of responsible adults (one adult for five children is suggested, but this may vary as children get older) must accompany and supervise the children.
- The responsible adults should be the same sex as the children they are travelling with.
- The 'two-adult' rule must always be followed, wherein two or more adults supervise all activities where children are involved and are present always. If it cannot be followed, an exception must be requested detailing the circumstances from the Vice President, Global Human Resources.
- Responsible adults may include parents, caregivers, trusted relatives, and ChildFund International or Partner Organization Representatives.
- Adults accompanying the children to the event are to be approved by the Country Office or International Office Department staff member responsible for the event.
- Responsible adults are briefed on the Child Safeguarding Policy and Code of Business Conduct and Ethics.
- Transportation arrangements for the event are planned and managed to ensure the safety of children.
- A safe walking route is to be arranged if children are required to walk to an event.
- Appropriate first aid equipment is to be available.
- At least one supervising adult must have a first aid qualification or should be ready to access external medical services if required.

- If overnight stays are required, supervisory and accommodation arrangements are to be made in compliance with the Child Safeguarding Policy.
- Responsible adults may not share a bed with a child, and where possible, each should have their own bedroom.
- If it is required to share a bathroom, the responsible adult may not use the bathroom at the same time as a child.
- Responsible adults may not consume alcohol while traveling with children.
- Sleeping and bathing arrangements should be carefully considered to ensure that children have privacy while remaining safe and under supervision by the responsible adults.

### Program Monitoring and Evaluation

Children participating in research, monitoring and evaluation activities (and all activities where children provide sensitive information to ChildFund International) are required to have provided informed consent as appropriate to their evolving capacity, in addition to a signed parental/caregiver permission form. Children’s verbal assent is also sought. When children do not assent, they do not participate in the research. Consent and assent can be withdrawn at any time. Confidentiality of children’s data is maintained. Where applicable, evaluations explore child safeguarding outcomes and inform future project design and implementation.

ChildFund International’s M&E process includes questions about the protection of children that are asked directly to children and youth. It is important that data collectors are trained not only in how to ask these types of questions in the appropriate way, but also in how to handle situations that suggest the possibility that a child has experienced harm.

All data collectors are trained in the Child Safeguarding Policy and how to respond to any information or observations that suggest the possibility of a child experiencing harm, abuse, neglect or exploitation, in line with the Breaches of Policy reporting structure. Data collectors will immediately report any actual or suspected breaches or harm of children to the Child Safeguarding Focal Point Person.

The Child Safeguarding Focal Point Person works directly with the program monitoring and evaluation personnel to provide regular feedback on program implementation to help identify any new, emerging, or unexpected child safeguarding risks.

Global Human Resources will identify lessons learned on Child Safeguarding Policy breaches available across the organization to Child Safeguarding Focal Points, who will use it to inform organizational and program learning where appropriate.

### Partner Organizations

Partner organizations are subject to an organizational assessment, which includes documentation of child safeguarding risks and responses. This risk assessment informs the decision to enter a partnership or not and will be regularly reviewed over the partnership’s duration.

It is important to always keep in mind that Partner Organizations are separate, independent organizations that are responsible for developing their own policies, procedures, and practices.

Legal agreements signed with Partner Organizations include a clause that requires partners to maintain and adhere to a child safeguarding policy that is consistent with and no less stringent than the ChildFund International Child Safeguarding Policy.<sup>12</sup> *Staff and volunteers are required to read, understand, and sign the Child Safeguarding Policy and Code of Conduct.*

Any alleged Child Safeguarding Policy violation committed by a Partner Organization's Representative in the implementation of a ChildFund International project is to be communicated to the ChildFund International Child Safeguarding Focal Point within 24 hours of learning of the policy breach.

ChildFund International may provide Partner Organizations with access to child protection training, resources, and capacity development to enable them to be compliant with child safeguarding standards and policies.

## Supporter Engagement

### Statement of Intent

Supporters are to be informed of ChildFund International's commitment to child safeguarding so that they can 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. To ensure that children are not placed at risk by communications with sponsors, several risk mitigation strategies are to be in place.

ChildFund International 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 International implements this child 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 International retains the right to carry out such checks at other times, when deemed appropriate.

ChildFund International's approach to Supporter Engagement incorporates child safeguarding by communicating and promoting a commitment to safeguarding by supporters, monitoring and screening communication between children and sponsors, acting when behaviors put children or sponsors at risk, and regularly assessing safeguarding procedures to ensure a child-safe environment. The ChildFund International Standard Operating Procedure Manual for Child Sponsorship provides detailed guidance on this.

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<sup>12</sup> Key criteria for the review of a partner's policy and procedures include the following: Screening of staff and volunteers; program risk assessment, management, and implementation; safe events and activities for children, including travel; if applicable, sponsor engagement, inclusive of screening, safeguarding identities, and visits; electronic and paper information safeguards; procurement; managing allegations, investigations and violations; and monitoring and reporting on safeguarding.

## Monitoring and Screening Donor-to-Child Virtual and Physical Contact

All donor communications through ChildFund are screened for inappropriate content, and any issues or incidents are documented and reported for follow-up action. There are procedures for screening communications from the child to the donor and from the donor to the child. All communications are screened by Partner Organizations, with a selection of communications screened at Country Offices.

Country Office content reviewers are required to inform the Partner Organizations when a child's communication raises concerns about the child's well-being; such reports can be made through Child Safeguarding reporting mechanisms addressed earlier in this document.

Sponsors' communications are screened for offensive, derogatory, or demeaning content, and efforts to groom<sup>13</sup> the child or family. Furthermore, letters must not contain any sexual references, provide sensitive or identifying personal details, or compromise the dignity of the child. All personal contact information is removed from all children's and sponsors' communications.

## Visits to Programs

Visits to programs may be undertaken by any Supporter — sponsors, donors, corporations, media, etc. All visits are coordinated by the International Office of ChildFund International, and a comprehensive donor visit procedure is in place. The pre-visit briefing includes supporter engagement staff advising the donor on the requirement to have a background check and the importance of child safeguarding. ChildFund International reserves the right to screen visitors (including criminal background checks) prior to field visits. Note: In those countries where background checks are not legally allowed, alternative procedures, as determined by ChildFund International's Alliance partners, must be in place.

As the world has shrunk, anecdotes suggest that children and sponsors are increasingly making contact outside of ChildFund's mediation. For this reason, it is critical to elevate our education of both families and sponsors, so they are more aware of the safeguarding risks and how to protect themselves.

Country Offices provide visitors with pre-arrival information on the culture, logistics, ChildFund International programs, and the sponsored child.

Security briefing and review of the safeguarding policy will take place before the sponsor meets with the child. During this initial meeting, the Country or Local Partner Office reviews the Child Safeguarding Policy with the supporter and asks them to sign their commitment to child safeguarding. The minimum safeguarding requirements are explained, namely that the visitor will be supervised by ChildFund International or local Partner Organization staff at all times during the visit, that no contact information can be exchanged, and that the visitor

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<sup>13</sup> Grooming refers to behavior that makes it easier for an offender to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to sexualize that relationship. This includes online grooming, which is the sending of an electronic message by an adult to a recipient whom the sender believes to be under 18 years of age, with the intention of establishing a sexual relationship.

cannot return to the community unaccompanied by ChildFund International and/or local Partner Organization staff.

If a ChildFund International staff member is unable to accompany the visitor, the Country Office will delegate a local Partner Organization escort, but the Representative must have signed and must fully understand and comply with ChildFund International's Child Safeguarding Policy.

If the visit involves a sponsored child, the child's parent or guardian must also be present during meetings between the child and visitor. At no time can the visitor and child be left alone. Meetings will preferably occur in public places. ChildFund International permits visits to a child's home rarely, and only with parental permission.

A post-visit debrief typically takes place with the Country Office. This allows the visitor to raise any concerns they 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.

Actual or suspected cases of any abuse or inappropriate behavior by a visitor are reported immediately to the Country Office Child Safeguarding Focal Point. An investigation is undertaken and may result in criminal investigation.

ChildFund International has 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 at the discretion of the Country Office to decide if the visit can go ahead. As with all visits, the visitor is accompanied always by ChildFund International or Partner Organization staff, and a post-visit debrief must take place.

### **Managing Supporter Violations**

If a Supporter is found to have violated child safeguarding protocols or if background checks reveal disqualifying events for sponsoring a child, ChildFund International's sponsorship database marks these actual or potential sponsors as "safeguarding restricted." When an active sponsor is disqualified, the family of the sponsored child is to be informed and coached as to how to protect themselves should the sponsor attempt to make contact. ChildFund International does not allow sponsorship from individuals marked "safeguarding restricted."

### **Monitoring ChildFund International's Supporter Engagement Child Safeguarding Practices**

Global Assurance conducts an audit of each Country Office at least every four years and an internal control review of each Local Partner at least every three years, including an assessment of the sponsorship practices compared to policy and procedure.

## Information and Communications About Children<sup>14</sup>

### Statement of Intent

ChildFund International maintains the highest standards of integrity in the preparation and distribution of images and messages related to children. ChildFund International is committed to undertaking all communications by and about children in a safe manner, such that the communications do not pose any potential or actual risk to children because of the material generated.

### Children's Images and Stories

All information and visual images, both photographs and moving images, of children, families and communities respect the dignity of the people depicted. Content (photo or video and text) that potentially stereotypes, sensationalizes, or discriminates against children, situations or places is not used.

Information for publication will be obtained in a safe and confidential manner. Guidelines mandate that children and all other human subjects depicted in photos are clothed appropriately for the culture. In cultures where children wear few items of clothing, ChildFund International ensures that images do not show areas of children's bodies that would be covered by underwear. Children should be clean and presented in dignified situations and settings. To maintain confidentiality, neither the child's full names nor any other identifying details (such as birth dates, family names or specific school or village names) are included in photos or stories. Where the risk of stigma is high, additional protective steps are taken to ensure that the child's identity remains unknown, such as images that do not reveal the child's or other human subject's face. In such cases, photographs should be taken from the back and any likeness to the child should be cropped.

ChildFund International aims to use high-resolution, good-quality images. All images for potential public use are reviewed by a designated person in the International Office prior to being made available in the media bank, at which point it becomes available across the organization. Country offices and other users upload photos to the media bank, where they are automatically designated as "pending review," at which stage they are not available for use. The images are accessible within the media bank only once they have been approved by the designated person, who will change the status to "active," i.e., available for use.

Once approved images are stored securely on ChildFund International's media bank, they may be downloaded and kept on ChildFund's IT equipment in accordance with relevant data and privacy laws. Anyone who works for ChildFund International or any of the Alliance members can request and receive access to the media bank. People who do not work for ChildFund International or an Alliance member can have access to the media bank when contracted to carry out a specific ChildFund-related activity. They must request access through their contact person within ChildFund to ensure that their request is legitimate. ChildFund

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<sup>14</sup> This procedure is focused on communications *about* children for the public. The Supporter Engagement procedure is focused on communication *between* children and sponsors and with sponsors about their specific sponsored children.

International's media bank minimum standards include the safeguards that children's full identities remain confidential and that images are not to be sold or assigned to another party; they can be used only by members of ChildFund Alliance, by contractors connected to ChildFund activities, or by selected others with special permission from the Executive Director of Brand and Communications.

ChildFund International obtains informed consent from parents/caregivers of children involved in programs and activities to use their stories and images. The informed consent involves explaining how the image will be used. In addition, children are asked to assent to their image or story being created and consent in line with their evolving capacities. Images and stories are never taken without assent or used without consent. Children who take part in ChildFund International activities but have not consented or assented to images and stories will wear something to identify them, such as a badge. If photos taken include these children, ChildFund International sees the identifier and does not use the image. The identifier also means that these children are not approached to give information.

Any complaints or concerns about inappropriate or intrusive images are reported in line with the Breach of Policy process.

Risk assessments for publicity, media and communications and advocacy activities are carried out regularly, and measures to reduce risk are put in place to ensure that children's, parents', and caregiver's identities remain confidential.

### Media

Children are briefed and prepared for interaction with journalists, photographers, or filmmakers. They are provided with information on how to keep themselves safe and how to report any concerns. A parent or caregiver should always be with the child.

Journalists are required to sign the Child Safeguarding Policy before they are in direct contact with children and are subject to checks in line with ChildFund International's procedures on recruiting consultants. Prior to meeting children, all journalists are briefed on the limits of the interview and/or contact with children in line with ChildFund International's visitor procedures. They are also informed of how to report concerns if they become aware of a child who is at risk or experiencing harm. They are always accompanied by ChildFund International and/or Partner Organization staff who have been trained in the Child Safeguarding Policy to ensure the safety of children and adherence to protocols.

### Social Media<sup>15</sup>

ChildFund International is committed to protecting children and their rights in all social media communications.

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<sup>15</sup> The term "social media" applies to any web-based and mobile technologies, in use now or developed in the future, that enable individuals or entities to publicly disseminate or receive information, communicate, or otherwise interact on a mass scale, and includes, without limitation, communications such as social posts, blogging, micro-blogging, bulletin boards, and so on, through providers such as, but not limited to, Facebook, Instagram, LinkedIn, Twitter, YouTube, WhatsApp, Snapchat and others.



ChildFund International staff and Representatives are personally responsible for any social media activity conducted with the ChildFund social media accounts they handle, and all ChildFund International staff and Representatives are personally responsible for any social media activity conducted on their personal social media accounts.

The use of social media has obviously spread over the past few years, and the question of how best to safeguard children through policies, procedures, and practices is challenging.

Representatives are expected to observe and follow existing organizational policies and agreements, including the Child Safeguarding Policy, the policies of the online/social networking venue, and applicable law. The Child Safeguarding Policy thus applies to Representatives' use of personal social media. Representatives and Supporters are prohibited from using social media to post or display comments or images that violate the organization's Child Safeguarding Policy.

Representatives and Supporters must not use or disclose ChildFund International's confidential or proprietary information in any form of social media. Information on, and images of, children accessing ChildFund International programs is also considered confidential, unless informed consent is obtained, as stated earlier. (When sharing information on or images of children with consent, all identifying information must be removed to protect children's privacy, as stated earlier.) Sharing this type of information without informed consent, even unintentionally, can potentially result in harm to the individual, harm to ChildFund International's business, and ultimately lawsuits against you and/or ChildFund International by an individual, other businesses or the government.

## Business Partners

### Statement of Intent

ChildFund International will ensure that processes for contracting and supplying goods and services are designed, implemented, and reviewed in line with child safeguarding requirements and principles.

### Contractors and Suppliers Having Contact with Children and/or Children's Data

ChildFund International assesses the level of contractor and supplier contact with or access to data held on children through the delivery of services and goods. If the nature of their work requires them to interact with children, the supplier should have their own Child Safeguarding Policy, deemed consistent with the standards of ChildFund International's policy, that is signed by their staff. Failing that, the contractor or supplier who has the contact with children must agree to comply with ChildFund International's Child Safeguarding Policy.

While we want all Business Partners to safeguard children, we recognize that not all Business Partners are equal. Some have direct contact with children or information about children, where safeguarding risks are higher than for those who do not have such contact. We therefore set different standards for Business Partners based on their exposure to children or children's sensitive data.



If the nature of their work requires them to interact with children’s data, the supplier or contractor is required to take all appropriate measures to ensure the protection and confidentiality of that data.

The ChildFund International Child Safeguarding Policy is annexed to all contracts where there will be contact with children and/or their data, and the policy is made available to all other contractors and suppliers on request.

Contractors and suppliers who may come into direct contact with children, or have access to data held on them, receive a pre-contract briefing on child safeguarding and codes of behavior. In addition, the supplier or contractor must guarantee that personnel providing those goods and services do not have current or past convictions related to child abuse. If the supplier or contractor later finds out that personnel do have current or past convictions related to child abuse, those personnel must not provide the services outlined in the contract.

### **Other Suppliers**

All other vendors or contractors are encouraged to commit to the protection of all children in their business operations. As part of the selection process, ChildFund International will give special consideration to vendors who demonstrate through their internal policies and practices that they are committed to keeping children safe.

### **All Business Partners**

Contracts with suppliers and contractors contain standard clauses that they agree to ChildFund International’s commitment to child safeguarding and understand how it applies to the supplier contracted.

Ongoing suppliers of goods and services must inform ChildFund International that they are not knowingly engaging child labor, and ChildFund International documents this confirmation.

ChildFund International receives gifts in kind, or contributions of goods or services other than cash grants, from corporations and businesses. Due diligence is conducted on donors. These gifts in kind are subject to international quality and safety standards.

## **Information Technology**

### **Statement of Intent**

ChildFund International creates stores and processes large amounts of information on children. It is important that ChildFund International manages this information in a way that is safe and secure and neither harms the dignity and privacy of children it serves nor compromises the integrity of the data it holds. Furthermore, ChildFund International prevents information technology from being used in ways that may cause harm to any child.

### Electronic Storage of Information on Children

All electronic information held on, and emails about, children are password protected. Access to children’s data is given only to designated people who require the information as part of their work.

### Monitoring Electronic Communications

ChildFund International utilizes electronic communications systems including but not limited to computers, internet systems, telephone, email and voice mail systems, through which employees receive and send messages. These communication systems are intended primarily for business use and are the property of ChildFund International.

ChildFund International upholds the applicable laws, guidelines and regulations that govern what information can be reasonably collected and how this information must be held and used.

ChildFund International may access its electronic communications systems and obtain the communications within the systems, without notice to users of the system, in the ordinary course of business when the company deems it appropriate to do so. ChildFund International also has the right to, and consistent with applicable law may, conduct spot checks to inspect or monitor without notice any devices employees use to access the company’s electronic communications systems, including but not limited to computers, laptops, notebooks, tablet computers or mobile devices.

With so much information being in digital form these days, we rely on IT to help us store and use children’s sensitive information in ways that are secure.

### Prohibited Usage of Information Technology

ChildFund International Information Technology guidelines prohibit the use of its electronic communication systems, networks, websites, social media sites, and digital photography in ways that may put children at risk and/or violate national laws or ChildFund International policies, including the Child Safeguarding Policy. This guidance covers the use of these technologies by ChildFund International Representatives as well as by children who utilize the technologies as part of ChildFund International operations.

ChildFund International’s policy prohibiting all types of harassment applies to the use of ChildFund International’s electronic communications systems, including internet access. No one may use electronic communications in a manner that may be construed by others as harassment based on race, national origin, gender, sexual orientation, age, disability, religious beliefs, immigration status or any other characteristic protected by applicable federal, state or local law.

When personal computers and other electronic devices (tablets, smart phones, etc.) are used to access ChildFund Computer systems, all necessary steps must be taken to secure the device. The loss of a personal device used to access ChildFund Computer systems must be reported immediately. No data of enrolled and program participant children may be stored on a personal device. Improper use of electronic equipment includes statements or images

that are pornographic, sexual or obscene in nature as well as files containing material that may be considered offensive or inappropriate according to the ChildFund International Child Safeguarding Policy. Web filters are in place and monitored to prevent access to websites and content that is not compliant with the web browsing policy.

## Accountability, Monitoring and Review of the Child Safeguarding Policy and Procedure

### Statement of Intent

Establishing clear governance and accountability mechanisms is critical to successful implementation of the Child Safeguarding Policy. Accountability for adherence to the Child Safeguarding Policy is ultimately held by ChildFund International's Global Leadership Team and Board of Directors.

### Monitoring of the Policy

Toward informing the organization whether all these accountabilities are being met, the General Counsel, working directly with Vice President, Global Human Resources, reports at least once a year to the Global Leadership Team and Board of Directors. This report is then made available to the whole organization. The report includes statements on the following:

- Number and nature of all reported policy violations, both allegations of harm to a child and general policy breaches, by ChildFund International Representatives.
- Status of open investigations.
- Results of closed investigations.
- Evidence of Child Safeguarding Policy, Procedure and Code of Conduct being understood and complied with across the whole organization.
- Statement on compliance with the overall policy, including identification of areas of strength and weakness, to be informed by an assessment process that includes country offices and the international office.
- Recommendations to strengthen the application of the policy and procedures.

As an organization that aims to be safe for children, we will need to learn from what works and which practices need to be strengthened. To this end, we closely track and report on the results of reported allegations and their resolutions, and we will refine our Child Safeguarding Policy and Procedures based on that.

Global Assurance reviews Country Offices and Local Partners periodically for compliance with policies, procedures, and legal agreements.

### Review of Policy

At least every three years, the Vice President, Global Human Resources leads the review of the Policy and Procedures and updates them as appropriate. The procedure for conducting the review is determined by the Vice President, Global Human Resources.

## References:

- ChildFund International Code of Business Conduct and Ethics
- Whistleblower Policy
- Whistleblower Procedure
- ChildFund International Standard Operating Procedure Manual for Child Sponsorship
- Supporter Care Child Protection Team Documentation Breaches of the Child Safeguarding Policy
- ChildFund International Employee Handbook
- Job descriptions
- Interview question template
- Background check authorization ADP
- Reference questionnaire
- Onboarding checklist
- Performance Planning and Evaluation Guidelines for Managers
- Consultant agreement template
- Life Stage Program Reference Manual
- Strengthening Community-Based Child Protection Pathways
- Agreement Template US-based INGO
- Letter of Agreement
- Child Protection in Emergencies Toolkits
- Sponsorship Standard Operating Procedure
- Sponsor Care Child Protection Team Documentation
- Social Media Policy
- Electronic Communications Policy
- ChildFund International Procurement Policy and Procedures
- Gifts in Kind Policy
- Internal Investigation Manual

## Related Regulatory Requirements

- USAID Acquisition and Assistance Policy Directive (AAPD 05-04) of June 9, 2005
- USAID Policy/Guidance on the Implementation of USAID Child Safeguarding Standards; A Mandatory Reference for ADS Chapter 200 of August 2015
- USAID Counter-Trafficking in Persons Contractor/Recipient Compliance: Agency-Wide Standard Operating Procedures, June 2012
- United Nations Convention on the Rights of the Child
- Inter-Agency Task Force on the Prevention of Sexual Exploitation of Displaced Children
- Child Protection Working Group (CPWG) Minimum Standards for Child Protection in Humanitarian Action (Updated 2019 [https://alliancecpha.org/en/CPMS\\_home](https://alliancecpha.org/en/CPMS_home))