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| POLICY NAME | Safeguarding Policy | POLICY # | PRO-POL-080 |
| APPLIES TO / SCOPE | All ChildFund International [Country Offices (CO), Fundraising Offices (FRO), and International Office (IO)] | POLICY OWNER | Global Operations |
| SUPERSEDES | POLICY GHR-POL-080 PROCEDURE GHR-PRO-080 November 2020 | APPROVAL DATE | June 13, 2023 |
| APPROVAL BY | ChildFund International Executive Team | EFFECTIVE DATE: | July 1, 2023 |
| NEXT REVIEW DATE | June 30, 2026 | RELATED PROCEDURES | Safeguarding Procedure |

1. PURPOSE

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

The policy also reinforces ChildFund’s commitment (the CEO Pledge) made as a member of InterAction on Protection from Sexual Exploitation and Abuse (“PSEA”) by and of NGO staff to practices and policies that will not only protect our own staff, but also the communities we serve and documents ChildFund’s commitment to uphold the Inter-Agency Standing Committee’s six core principles relating to Prevention of Sexual Exploitation and Abuse¹ which are critical to our work.

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

2. POLICY

- 2.1. ChildFund has **zero-tolerance for sexual exploitation and abuse**, neglect, and all forms of harm, violence, or misconduct to program participants.
- 2.2. **Adherence** to this policy is mandatory for all staff, partners, board members or trustees, consultants, vendors, interns, volunteers, program visitors, journalists, and all other representatives acting for and on behalf of ChildFund in any capacity. Alternatively, Implementing Partners may have signed agreements with Country Offices such as the Letters of Agreement signed by Local Partners, which require them to maintain and adhere to their own Safeguarding Policy which is at least as stringent as ChildFund's.
- 2.3. **Local Adaptation:** Country Offices will document in a Country Office addendum to this policy, any exceptions to the policy that are needed to comply with local laws and contexts and will periodically review and update the addendum as those laws change. The Global Safeguarding Advisor will approve Country Office addendums upon development and updating.
- 2.4. **Behavior protocol:** ChildFund has set clear expectations or standards of behavior for staff, and representatives, to ensure that their personal and professional conduct is always of the highest standard.
- 2.5. **Risk assessment:** To understand when, where and how ChildFund's mission interacts with program participants, we shall periodically conduct safeguarding risk assessments in all its programs and operations to have a common understanding of safeguarding issues across the diverse environment in which we operate as the foundation to our safeguarding practices.
- 2.6. ChildFund staff, programs, and operations shall **Do No Harm to program participants**, communities, and staff and representatives shall equally be protected, especially when they are vulnerable or at risk of harm.
- 2.7. **Prevention:** ChildFund commits to putting in place effective systems and procedures to prevent and protect program participants from harm or abuse. The procedure accompanying this policy details measures covering policy dissemination and awareness, adaptation, behavior protocols, risk assessments, recruitment, background checks, programs/projects, mandatory training and education, program visits, partnerships, procurement, communications, management, supporter engagement, child participation, culture, general operations, etc.
- 2.8. **Detection:** ChildFund commits to undertake robust safeguarding training and awareness for all staff, representatives, and program participants to be able to recognize the different signs and symptoms of potential abuse or harm to act appropriately.
- 2.9. **Reporting:** It is mandatory for all ChildFund staff and representatives to report a safeguarding concern (alleged or actual) related to program participants or any breach of this policy and behavior protocol. Reporting must be done within 24 hours of notice or being informed of the concern.
 - 2.9.1. Concerns may be reported to any ChildFund Manager, who must then contact Global Assurance within 5 business days.
 - 2.9.2. ChildFund commits to having a **centralized system for allegation and incident management** internally and externally to report and record safeguarding concerns in a safe, confidential, accessible, transparent, and survivor focused manner.
 - 2.9.2.1. **Internally:** ChildFund to have a robust safeguarding reporting mechanism for timely and confidential reporting for staff and representatives by way of: a safeguarding incident reporting form to a designated Focal Point; via the complaints email: complaints@childfund.org; anonymously using the whistleblower at <http://speakup.childfund.org> or calling the hotline number provided for each country on the website.

- 2.9.2.2. **Externally:** COs shall establish Community Feedback Mechanisms (CFM) for program participants and communities, to report safeguarding concerns/complaints. CFMs shall have multiple reporting channels, designed in collaboration with communities and that are inclusive; established based on already existing communication methods; provide opportunities for regular communication, collaboration, and feedback.
- 2.9.2.3. Reporting mechanisms shall have accompanying operational guidelines upon which all staff, representatives, program participants, and communities will be trained.
- 2.10. **Response:** ChildFund emphasizes the **Survivor Centered Approach** in the provision of assistance and referrals to survivors of sexual exploitation, abuse, neglect, and all other forms of harm while ensuring the best possible level of care and support is provided to survivors.
 - 2.10.1. Safeguarding concerns received shall be dealt with appropriately, promptly, and adequately in line with established safeguarding procedures while respecting the dignity of the affected.
 - 2.10.2. ChildFund is committed to be a “trauma-informed” organization in which all components of the organization have been evaluated in light of the basic understanding of how trauma resulting from harm/violence affects the lives of survivors.
 - 2.10.3. ChildFund commits to **having a system** in place to ensure survivors of sexual exploitation, abuse, and other harms, receive immediate professional assistance. **Support services will be mapped** out in respective program locations or countries to have functional referral pathways for provision of comprehensive range of services to survivors, based on their needs and consent.
 - 2.10.4. **Survivors shall be informed of the available services**, referral pathways, and the guiding principles for the provision of assistance and support - including confidentiality and informed consent. Where ChildFund cannot provide the necessary assistance, referrals to professional service providers will be made appropriately regarding the following services: *Safety, Psychosocial support, medical care, Legal aid, Basic material assistance.*
 - 2.10.5. Where the alleged act constitutes a crime, ChildFund shall explore with the complainant or survivor to ensure appropriate reporting to law enforcement, authorities, or the police.
- 2.11. **Accountability:** ChildFund commits to promoting a culture of open dialogue and shared accountability for the safety and well-being of staff, representatives, program participants, and communities.
- 2.12. Procedures or guidance on how to **apply and implement** this policy are provided so that safeguarding is meaningfully integrated into everyday culture and practices across the organization.
- 2.13. **Investigations:** ChildFund will undertake timely administrative investigations and management of all cases, allegations or incidents of safeguarding nature reported as indicated in section 2.9 above. This includes development of individual case plans and management through referrals, follow-ups, and timely closure of all concerns/cases.
 - 2.13.1. **Administrative Investigations** shall be conducted by experienced and qualified professionals.
 - 2.13.2. **Confidentiality** is a cardinal principle that shall be upheld, while carrying out investigations on alleged abuse, regarding information, in all communications with the media and when making referrals including for criminal investigations.
 - 2.13.3. ChildFund **Investigations shall follow these general steps** i.e., Receive an allegation; Make management decision on how to proceed; Appoint investigation team Plan the investigation and undertake a risk assessment; Gather and study background material and documentary evidence; Update investigations plan and draft interview questions; Interview witnesses; Write the investigation and management outcome report; Conclude the investigation and submit report to management for appropriate follow-up.

3. DEFINITIONS

- 3.1. ChildFund: Includes the International Office (“IO”) and Country Offices (“CO”). The policy also extends to all grant funded ChildFund Projects and Operations.
- 3.2. Program participants: Any person or group of people who directly receive goods or services through participation or involvement in one or more of the programs, projects, interventions, operations supported by ChildFund directly or through its representatives.
- 3.3. Representative: Any person or entity formally related to ChildFund in a paid or unpaid capacity and their associated personnel (i.e., partner, volunteer, Intern, contractor, consultant, vendor, donor, visitor, board member, etc.)
- 3.4. Safeguarding: For purposes of this policy, safeguarding means taking all reasonable steps to prevent SEA, neglect, and all forms of harm, violence, or misconduct from occurring; to protect program participants, especially children, young people, and vulnerable adults, from that harm; and to respond appropriately when harm does occur. ChildFund adapts the following international definitions for related concepts, particularly those of the UN:
 - 3.4.1. Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting monetarily, socially, or politically from sexual exploitation of another. Under UN regulations it includes transactional sex, solicitation of transactional sex and exploitative relationship.
 - 3.4.2. Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It includes sexual assault (attempted rape, kissing / touching, forcing someone to perform oral sex / touching) as well as rape. Under UN regulations, all sexual activity with someone under the age of 18 is sexual abuse, regardless of the age of majority or consent locally. Mistaken belief in the age of a child is not a defense.
 - 3.4.3. Protection from Sexual Exploitation and Abuse (PSEA) is the term used by the UN and NGO community to refer to measures taken to protect people from SEA by their own staff and associated personnel.
- 3.5. Staff: Any person who has been formally appointed as an employee of ChildFund on a contract basis.
- 3.6. Managers: Senior Management, Directors, Supervisors, or other individuals who manage or supervise people at different levels of the organization, programs, and projects.
- 3.7. Senior Management: ChildFund’s President and Chief Executive Officer, Vice Presidents, Regional Directors, International Office Directors, and Country Directors.

4. RESPONSIBILITIES.

- 4.1. Board of Directors: Provide strategic direction, guidance, and oversight to create a safe organization.
- 4.2. President and CEO: Communicate strategy for creating a safe organization and motivate staff and representatives to implement it.
- 4.3. Senior Management/Leadership: Actively promotes and supports safeguarding and visibly encourages a culture of raising concerns at the earliest point. Safeguarding is a regular agenda item at senior leadership and management meetings; and promotes strict adherence to the safeguarding policy and procedure.
- 4.4. Safeguarding Focal Points: To coordinate and technically support the development and implementation of the safeguarding policy and procedures.
- 4.5. All Managers: Managers have a particular responsibility to create a safe and conducive environment for the implementation of this policy and procedures.

- 4.6. Program Managers: Lead, coordinate and manage the implementation of safe programs/projects and supervise project teams.
- 4.7. MEL: Monitor, track and report program/project activities including components of the safeguarding policy.
- 4.8. Global Human Resources: Safely recruit, manage, and develop staff to create a safe organization.
- 4.9. Global Assurance: Maintain the process for receiving and handling concerns and complaints reported to ChildFund through any means, including managing an anonymous reporting mechanism for the organization. With Global Human Resources and Legal, screen complaints, determine which complaints require investigation, develop investigation plans with Senior Management, coordinate investigations, and communicate results of investigations to Senior Management and the Audit Committee of the Board of Directors.
- 4.10. Communications: Manage the organization's visibility and oversee communications (online and offline) to ensure promotion of safeguarding and protection of program participants from harm, and media crisis management when safeguarding concerns occur.
- 4.11. All staff: Mandatory reporting and contribute to creating a safe organizational culture.

5. EXCEPTIONS

- 5.1. None

6. RELATED REGULATORY REQUIREMENTS

- 6.1. Inter-Agency Standing Committee Minimum Operating Standards for Protection from Sexual Exploitation and Abuse for UN and non-UN staff.
- 6.2. The Core Humanitarian Standards.
- 6.3. Keeping Children Safe International Child Safeguarding Standards
- 6.4. Core Humanitarian Standards Alliance
- 6.5. Awarding agency requirements e.g.,
 - 6.5.1. DFAT Minimum requirements for Safeguarding,
 - 6.5.2. InterAction's from Pledge to Action,
 - 6.5.3. UNICEF's Program Cooperation Agreement (PCA) Safeguarding Requirements, etc.

7. RELATED/COMPLIMENTARY CHILDFUND POLICIES AND PROCEDURES

- 7.1. ChildFund Safeguarding Procedure
- 7.2. Code of Business Conduct and Ethics
- 7.3. Emergency Response Policy and Procedure
- 7.4. Whistleblower Policy and Procedure
- 7.5. Fraud Prevention and Awareness Policy and Procedure
- 7.6. Purchasing Procedure
- 7.7. Security Incident Response Policy
- 7.8. Social Media Policy