



CHILD SAFEGUARDING POLICY

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Related Documents:

- 2015-2018 Strategic Plan
- Ethical Code
- Code of Good Governance
- Child Participation Standards
- Suggestions, Complaints and Commendations Policy
- Partnership Policy Guide
- Gender Equity Policy
- Policy on collaborating with businesses
- Protocol for Action in Violent Situations
- Code of Conduct for Regulatory Compliance

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Contents

Definitions	5
Introduction	9
Statement of commitment and guiding principles	11
Objectives	13
Scope	14
Code of conduct	15
Child safeguarding risks assessment and management	17
Information and communication	18
a. Collecting information and images	18
b. Information and image usage	20
Responding to concerns, suspicions or incidents	22
Recruiting, employing and managing staff (including staff that provide external services)	26
Awareness raising and training	27
Local partner organisations and associated responsibilities	28
Implementating, monitoring and reviewing the policy	29
Bibliography	31
Annexes	33



All children have the right to reach their full potential and have a life free from all types of violence.



Definitions

The following definitions aim to assist in the understanding of this document and guide the behaviour and work of all the actors included in its scope (see section 4. Scope):

- **Children and adolescents:** Anyone under 18 years of age, regardless of whether current legislation in a given context determines an earlier age of majority.
- **Children with disabilities¹:** Children that present long-term physical, mental, intellectual or sensorial impairments, which, when interacting with a range of existing barriers in a given context, can prevent their full and effective participation in society, and from enjoying the same conditions as other children.
- **Discrimination/non-discrimination:** Discrimination is the denial of equal rights to a social group or its members, on the grounds of prejudice and stereotypes². Discrimination especially affects children, because they are the population group most vulnerable to its negative effects. Therefore, the principle of non-discrimination carries with it a responsibility to ensure that excluded persons or social groups have access to their rights on an equal basis with the rest of the population.
- **Child protection:** Educo understands child protection as preserving children's integrity and promoting safe environments for children to develop in, in which both the Rights of the Child and children's best interests are respected. This includes implementing actions for the prevention of, detection of and response to any form of violence, abuse, negligence or exploitation.
- **Child safeguarding:** It is the organisation's responsibility, through the application of a set of procedures, guidelines and practices, to ensure that its programs, projects and other interventions do not cause any harm or expose the children who participate in the activities we develop to any risk of violence and/or harm.

1. Definition adapted from United Nations (2006). *Convention on the Rights of Persons with Disabilities*.

2. Definition adapted from Fiske, S. (2010). *Social Beings: Core Motives in social Psychology*. Wiley & Sons.

- **Child positive treatment:** Educo understands positive treatment of children as the existence of relationships between children and between adults and children which are based on a profound respect for others and recognition of their value and their rights. They are balanced and empathetic relationships which create a positive context of affection and care and promote the full development and wellbeing of children.
- **Child wellbeing:** Educo understands child wellbeing as the realisation of the Rights of the Child and the fulfilment of the opportunity for every child can be all she or he can be in the light of their abilities, potential and skills³.
- **Best Interests of the Child⁴ Principle:** This principle establishes that every decision or measure that is adopted and concerns or involves a child or a group of children, must be made by prioritising their rights, interests and needs. It promotes the dignity of all children without exception, and guarantees their integrity, their holistic development and the full and effective enjoyment of all the rights they are entitled to. The application of this principle involves an ongoing process of assessment of the effects of a given situation on the rights of children, taking into consideration the context, the moment and, of course, their opinion and any special needs they may have.
- **Violence against children⁵:** The deliberate use of physical force or power, de facto or in the form of a threat, against or between children that causes or is likely to cause injury, death, psychological harm, developmental disorders or deprivation.
- **Physical violence against children:** To cause, in any way, real or potential physical harm to a child.



The best interest of children is protected and promoted in all situations and contexts.

3. Bradshaw, J.; Camfield, L et al. (2010). *Children's Well-being in Developing Countries: A conceptual and Methodological Review*. European Journal of Development Research Vol. 22, 3, 398-416.

4. Definition adapted from General Comment no. 14 by the UN Committee on the Rights of the Child.

5. Definition adapted from the World Health Organisation (2016). INSPIRE: *Seven strategies to end violence against children*.



- **Emotional/psychological violence⁶ against children:** To cause, in any way, real or potential psychological or emotional harm to a child. It includes acts such as restricting movement, degrading, humiliating, intimidating, harassing, ridiculing and other forms of hostile treatment or rejection, whether in person, in a family, school or community setting, or through the use of technology. It affects the emotional and psychological integrity and the development of the child. Being a witness of violence (accidentally or by force) is also a form of emotional/psychological violence.
- **Sexual violence against children:** Forcing or inciting a child to participate in sexual activities, either by adults or other children, with whom he or she has an unequal relationship owing to age, maturity or power imbalances. It includes acts which involve physical contact, consummated or attempted, with or without penetration, as well as sexual harassment, exposing children and adolescents to the observation of sexual activities or inciting them to behave in a sexually inappropriate manner. Another form of sexual violence is sexual exploitation, i.e. the use of children in any sexual activity in exchange for cash or in kind (gifts, food, accommodation, etc.) or any other compensation (status, etc.), which is given to the child or to third parties. It includes smuggling children for this purpose, sexual tourism, the production, promotion and distribution of pornography featuring children and distributing it via a range of channels, like the internet, and the use of children in sexual performances (public or private).
- **Child abuse:** A type of violence which we use to describe any action, omission or negligent treatment which deprives children and adolescents of their rights and wellbeing, which harms or could harm their physical, psychological, emotional or social development, and the perpetrators of which can be adults, other children, institutions or society⁷. In particular, we use the term abuse when referring to especially severe/intense acts, or those which are repeated over time.
- **Harmful practices:** Harmful practices constitute a form of child abuse. They are a denial of children's dignity and integrity, and a deprivation of their rights and fundamental liberties. They can be traditional or newly created practices rooted in social norms and are normally imposed on children and adolescents by their families, members of the community or society as a whole. These include child marriage, female genital mutilation and physical or corporal punishment. The latter is defined as any punishment in which physical force is used and the aim of which is to cause pain or discomfort, however slight⁸. In most cases this involves hitting a child or adolescent using the extremities of the body or an object. Physical or corporal punishment is still widely accepted by society, rooted in erroneous beliefs, traditions and practices in which it is seen as an indispensable disciplinary tool.

6. Definition adapted from the World Health Organisation (2016). INSPIRE: *Seven strategies to end violence against children*.

7. Definition adapted from Keeping Children Safe (2014). *Standards for Child Protection and how to implement them*.

8. General Comment no. 8, par. 11, by the UN Committee on the Rights of the Child.

- **Neglect and negligent treatment:** A form of violence consisting in the persistent omission or failure to satisfy the physical and/or psychological needs of children or adolescents despite having the means to do so, which will most likely result in the severe deterioration of the physical and/or psychological development of the children or adolescents concerned. It includes not adequately supervising or protecting children and adolescents from possible harm, as well as not providing the conditions for their healthy and safe development (nutrition, health care, shelter, access to education). It can include negligence during pregnancy as a result of drug or alcohol abuse or any other substance that represents a risk to their health⁹.
- **Intimidation/bullying (includes cyberbullying):** Aggressive behaviour and intentional and continuous violent acts carried out on a child or adolescent by another child or adolescent or group of children or adolescents in which there is a real or perceived imbalance of power. It causes physical, psychological and/or social harm on a repetitive basis, and often takes place in education centres and other places in which children and adolescents gather, as well as online¹⁰.
- **Child commercial exploitation/labour:** Forcing a child to work and engage in other activities intended for the economic benefit of a third party which are detrimental to the child's physical or mental health, education or psychological, emotional and social development.
- **Institutional violence against children:** Any act of violence or denial of Human Rights (including discrimination) against a person or a given social group on behalf of public authority members or institutions. Institutional violence contributes to the revictimization of children and adolescents instead of providing the necessary attention required for their best interests, to strengthen their resilience and promote their development.
- **Gender violence¹¹:** Any act of violence based on the biological sex or a particular gender identity of an individual, which results in, or is likely to result in, physical, psychological or sexual harm or suffering.
- **Revictimization:** A process which involves additional suffering for people who have been victims of violence or whose rights have been violated. Revictimization occurs when a person has to remember an event in a traumatic way, and be or feel stigmatized, blamed or rejected during contact with institutions (in the framework of an investigation or the application of protective measures) or during contact with society (media, community, their own social circle, etc.). Revictimization increases a person's vulnerability, and as a consequence, their risk of suffering from recurring violence over time.

9. Definition adapted from Keeping Children Safe (2014). *Standards for Child Protection and how to implement them*.

10. Definition adapted from the World Health Organisation (2016). INSPIRE: *Seven strategies for ending violence against children* and from UNESCO (2017). *Report on School Violence*.

11. Definition adapted from the World Health Organisation (2016). INSPIRE: *Seven strategies for ending violence against children*.

Introduction

Educo is a non-governmental development and humanitarian action organisation which has been working for more than twenty-five years on behalf of children to defend their rights. Our identity and commitment are expressed in our institutional mission: *We work with children and their communities to promote fair and equitable societies that guarantee their rights and wellbeing.*

And our vision reflects the world we aspire to: *A world in which all children fully enjoy their rights and lead a dignified life.*

It is therefore vital that the organisation has a central instrument like the present policy, which is based on the principles gathered in the following reference documents:

- *Convention of the Rights of the Child (CRC)*, which provides the international framework for the right to protection from all kinds of violence (article 19), discrimination (article 2) and different forms of exploitation (articles 32.36).
- Resolution S-27/2 *A world fit for children* (2002) and General Comment number 13 (2011) by the Committee on the Rights of the Child regarding *the Right of children to not be subjected to any form of violence*, which establishes the protection of children and adolescents as an absolute priority.
- *Child Safeguarding Standards*, from the network Keeping Children Safe¹².
- *Child Safeguarding Policy Guidelines*, from ChildFund Alliance.

12. Keeping Children Safe (2014). *Child Safeguarding Standards and how to implement them*.

Similarly, it is important to acknowledge the work the organisation is developing in the area of humanitarian action, and the extreme importance that the issue of child protection has in this area. Therefore, this policy is based on and incorporates the relevant provisions contained in:

- *The Minimum Standards for Child Protection in Humanitarian Action (2012)*, elaborated by the Child Protection Working Group.
- Standards 4 and 5 from *The Core Humanitarian Standard on Quality and Accountability (2015)*, elaborated by CHS Alliance, Group URD and the Sphere Project.

Educo's work is therefore based on the recognition that all children and adolescents should have the opportunity to enjoy their rights, regardless of their national, ethnic or social origin, their gender, language, religion, political opinion or financial situation, their different abilities and any other condition¹³ they or their family have that could serve as a basis for discrimination. Educo firmly condemns all forms of discrimination, which has consequences, often serious ones, for children and adolescents.

Similarly, all children and adolescents have the right to achieve their full potential by having a life free from all forms of violence, which is multiplied and exacerbated in situations of discrimination. All children and adolescents therefore have the right to be and feel protected.

For this reason, and despite the fact that for the purposes of practical application of this policy, various forms and degrees of violence are defined, Educo recognises that all of them are very harmful and strongly condemns all types of violence against children and adolescents, including violence between peers, a phenomenon that must be dealt with firmly and with the utmost caution, defining the lines of action which incorporate the best interests principle.

13. This includes all those children who, although not belonging to officially recognised categories, have specific support or educational needs and may find themselves de facto in a situation of vulnerability, discrimination and limitation of their right to participation.

Statement of commitment and guiding principles

Educo, in the context of the adoption of the Child Rights-based Approach, has developed this Child Safeguarding Policy in order to create conditions which minimise the risk of unprotected situations for the children who participate, directly or indirectly, in our programs, projects, campaigns and activities. Additionally, this policy acts as a guide for the advocacy actions to be carried out in order to eradicate violence against children and promote child protection and positive treatment of children.

Educo is also committed to working for the prevention of violence by creating a culture of positive treatment, in which relationships with children promote their dignity and favour their full development and wellbeing in an emotional environment that is positive and caring. We therefore work to ensure that all the actors included in the scope of this policy (see section 4. Scope) apply the highest standards of behaviour towards children, both in their professional and private lives.

To do this, Educo is guided by the following principles:

- The best interests of the child are protected and promoted in all situations and in any context.
- All children, without exceptions of any kind, have the right to be protected against any form of violence and to have their dignity respected.
- The protection and positive treatment of children is a responsibility that is shared between the board of trustees and the Educo staff team, the actors we work with, the communities we work in, the children themselves and the State bodies which develop programs, projects, campaigns and activities with us.
- A positive treatment culture is promoted, and emphasis is placed on and efforts are made to provide safe environments (at school, in the family and in the community) which allow for the positive development of children, taking into consideration the specific situation of children with disabilities and those with particular characteristics within their communities (for example albino children in certain contexts).
- The creation of an active safeguarding and positive treatment network within the organisation is promoted, joining forces so that children are protected effectively.

- Any type of violence against children or between children is a violation of their rights. We exercise a zero-tolerance stance towards all types of violence against children.
- The development of a safe reporting culture is promoted so that any concerns, suspicions or incidents relating to child safeguarding and positive treatment are reported in a timely and proper manner.
- Educo responds to any case of violence, abuse and exploitation, whether it is suspected, attempted or carried out, always in accordance with the nature of the case, in a careful manner and with a guarantee of confidentiality.
- Educo respects the conceptions and customs of the different population groups which live in the places it works in and takes into account their legal and socio-cultural context, provided they are not inconsistent with an approach that promotes positive treatment.
- Where possible, Educo collaborates in the strengthening of the abilities of the different actors it works with, to guarantee that all of its activities are developed in a protected, positive treatment environment for children.
- Where possible, children's opinions are collected and used to guide the design, implementation and review of this Child Safeguarding Policy which, in any case, shall be an instrument which is perfectly well-known and understood by the children themselves.

Based on these principles, Educo fulfils its commitment by carrying out the following actions:

- **Training and awareness raising:** all the actors included in the scope of this policy (see section 4. Scope) shall be informed, know about and understand the consequences of violence and the related risks which children are faced with, and therefore know what steps to take to report any concern, suspicion or incident which emerges in relation to the safeguarding and positive treatment of children.
- **Prevention:** all the actors included in the scope of this policy (see section 4. Scope) shall make an effort to minimise the risk of violation of the rights of children and create the adequate environment for a positive treatment culture.
- **Responds in a serious, quick and effective manner:** any suspicion of violence, abuse or any type of exploitation of children is dealt with swiftly, and all associated risks are assessed, and actions are taken to protect children and adolescents and all other parties involved.

Objectives

The objectives of this policy are:

- **To raise awareness and promote a culture of protection and positive treatment towards children** in the workplace, at home and in the community.
- **To guarantee that all the people included in the scope of this policy (see section 4. Scope) are prepared, understand, accept and support the fulfilment of their responsibilities** in relation to safeguarding and positive treatment of children.
- **To guarantee that Educo has clear procedures for preventing and responding to violence against children**, establishing safe and transparent channels to report concerns, suspicions and incidents in relation to safeguarding and positive treatment of children.



We raise awareness and promote a culture of protection and positive treatment for children.

Scope

This policy applies to the following actors:

- a. **Educo Board of Trustees.**
- b. **Educo team:** staff, volunteers, interns, trainees and people on work experience.
- c. **External services providers.**
- d. **Educo Ambassadors.**
- e. **Local partner organisations that have a formal contractual relationship with Educo.**
- f. **Suppliers.**
- g. **Other people related to Educo,** when they have contact with children in the context of the organisational work, or access to information about them:
 - Sponsors, donors and supporters.
 - Journalists and other media professionals.
 - Photographers.
 - People who visit projects, including anyone that accompanies them.

All these actors accept the obligation to respect this policy and the responsibilities arising from a failure to comply. This should be expressed formally by signing the relevant letter of commitment (see *Annex 1: Letters of commitment for the Child Safeguarding Policy*), a signature that will be renewed according to the periodicity established in each country office (this should take place at least every time this policy is reviewed).

Code of conduct

Failure to comply with this Code of Conduct will result in the application of the disciplinary measures established in *Annex 2: Internal cases of violation of the Child Safeguarding Policy and related measures*.

Code of conduct	
The people included in the scope of this policy (see section 4. Scope) must:	The people included in the scope of this policy (see section 4. Scope):
<p>a) Treat all children with respect, regardless of their sex, ethnic origins, language, religion, political or other opinion, national or social origins, financial position, the fact that they have any kind of disability, or any other condition a child, and his or her family or legal guardians may have.</p> <p>b) Provide an inclusive, safe and positive treatment environment for all children, parents and legal guardians, and one which allows for and promotes dialogue about children's rights and concerns.</p> <p>c) Favour a positive treatment culture among children so that they respect each other and become positive treatment agents in their communities.</p> <p>d) Comply with the laws, customs and traditions in the areas we work in or visit. In cases where the laws, customs or traditions contravene with the CRC, the latter prevails.</p> <p>e) Guarantee that he/she is always visible when in contact with children participants in our projects and activities, or accompanied by at least one other adult, who does not necessarily need to be an Educo staff member. The possible exceptions to this rule will be studied case by case.</p> <p>f) Report any concern, suspicion or incident immediately following the established procedure, about a violent act against a child, or any non-fulfilment of this Policy and Code that they know about.</p>	<p>(a) Must not subject children to any form of physical or psychological violence, or any degrading or humiliating treatment such as insulting, shouting, humiliating, ridiculing, threatening or any other type of situation or action which may cause physical or psychological damage, regardless of whether or not the treatment is culturally acceptable.</p> <p>(b) Must not subject children to any harmful practices.</p> <p>(c) Must not make any kind of sexual advances or subject children and adolescents to any other kind of sexual violence, perpetrated or attempted, including, but not limited to, exposing the child to sexual acts or pornographic images.</p> <p>(d) Must not marry or engage in sexual relations with children, even if this practice is accepted by the local laws and customs.</p> <p>(e) Must not produce, publish, consume or share child pornography.</p> <p>(f) Must not employ or rely on children's services for domestic work or any other kind of work that is inappropriate for their age or development stage and/or that which is detrimental for their physical or mental health, education, or their psychological, emotional or social development.</p> <p>(g) Must not ask for personal information from the children that participate in our projects and activities (except the contact details of their legal guardians) unless this is justified for their best interests. In the case of adolescents, it is acceptable to ask them for information when this is necessary for the development of an activity.</p>

g) Adhere to the established rules in relation to gathering and using information about and/or images of children (see section 7. Information and Communication).

(h) Must not share personal information about the children that participate in our projects and activities, especially their contact details, with third parties, except in the case of legal guardians or if it is justifiable for the best interests of the child in question.

(i) Must not interact with children who participate in Educo programs and activities outside their working hours, except in cases where they live in the same community and this contact is a consequence of family or social circumstances. **In these circumstances, the confidentiality and privacy of the information the person has access to at work will be guaranteed.**

(j) Must not communicate with the children who participate in programs, projects, campaigns or activities using their personal phone number or email address or establish any kind of relationship through personal social media profiles. If there is a need to communicate this should be done using the official communication channels provided by the organisation.

(k) Must not behave in a way which could be considered a bad example or have a negative influence, directly or indirectly, on the child participants in our projects and activities. Therefore, during work with child participants in our projects and activities, smoking and drinking alcoholic beverages is not permitted. In the same way, they will not consume any narcotic substances in a professional context.

(l) Must not sleep alone in the same room as the child participants in our projects and activities, except in cases strictly justified for professional reasons and only when the relevant security protocols that exist at country office level have been applied.

(m) Must not stay in, or select for carrying out activities, any establishment which is directly or indirectly complicit in child labour exploitation or the commercial sexual exploitation of children.

(n) Must not transport children in institutional vehicles, except in cases where it is strictly necessary for the development of a program, project or campaign or other activity, and only when the relevant security protocols that exist at country office level have been applied.



Child safeguarding risk assessment and management

Educo will include as an objective in all its areas of action, programs, projects, campaigns and activities, the preservation of the integrity of children in safe and protected environments.

Educo staff will carry out a systematic child safeguarding risk assessment in all its areas of action, and, in particular, in the programs, projects, campaigns and activities in which it has contact with children. It is important to remember that these children may be participants in the activities themselves, or they may be accompanying adult participants.

The assessment should identify risks, analyse them and establish the steps that will be carried out to reduce or eliminate them.

This process should include the participation of the children themselves where possible. It will be carried out during the preliminary design of the programs, projects, campaigns or activities and during the phase in which they are being formulated. The monitoring and updating of this risk assessment should be reflected in the intermediate and final reports of these programs, projects, campaigns and activities.

Of course, this participation process will follow the guidelines established in the Educo *Child Participation Standards* and at the same time the intrinsic risks associated with participation processes will be evaluated in order to avoid any dangerous or revictimization situations for the child participants. Special attention will also be given to the stage of development the children concerned are in.

These risk assessments will lead to the elaboration of the relevant mitigation strategies, indispensable for preventing violence and promoting a safe environment and a positive treatment culture for child participants in Educo programs, projects, campaigns and activities.

More information can be found about this, as well as tools available for this purpose, in *Annex 3: Tools for risk assessment and management*.

Information and communication

When collecting, processing and using information and images, be they photographs or videos, of child participants in programs, projects, campaigns or other Educo activities, the basic principle for this work is respect for and protection of their dignity, as well as that of their families and communities. It is important to always take into consideration children's rights to privacy and ensure that none of the activities – programmes, sponsorship, advocacy, communication, marketing – put their safety at risk.

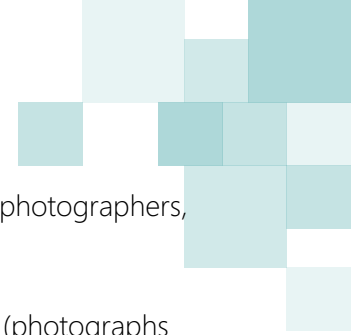
Where possible, at the beginning of the implementation of a programme, project, activity or campaign, the general consent of the child participants, their families and communities should be sought for collecting communication material, and joint decisions should be made about what the overall messages will be, what kind of images are appropriate, and how this communication material will be used afterwards.

All media staff, photographers and visitors in general must be accompanied by local Educo staff during their visit and throughout the contact with the child participants in the Educo activities and with their families. If these people have any doubts in relation to what is established in this section of the Child Safeguarding Policy, they must immediately get in touch with the Educo staff that are preparing their visit or accompanying them.

The people and organisations that request the use of resources like personal information, photographs, videos and statements from the children must sign an agreement about the adequate use of this material. Failure to comply with the terms of such an agreement may result in termination of the agreement.

a. Collecting information and images

- Efforts should always be made to act in accordance with local culture and tradition when images are being taken (photographs or video) of a child, and special attention should be paid to the advice and concerns of the staff from the Educo country office and/or the staff from the local partner organisation.
- In the case of reports made by external media staff and/or photographers, the actions must be carried out as established in Annex 4: Interviewing children using a rights-based approach.



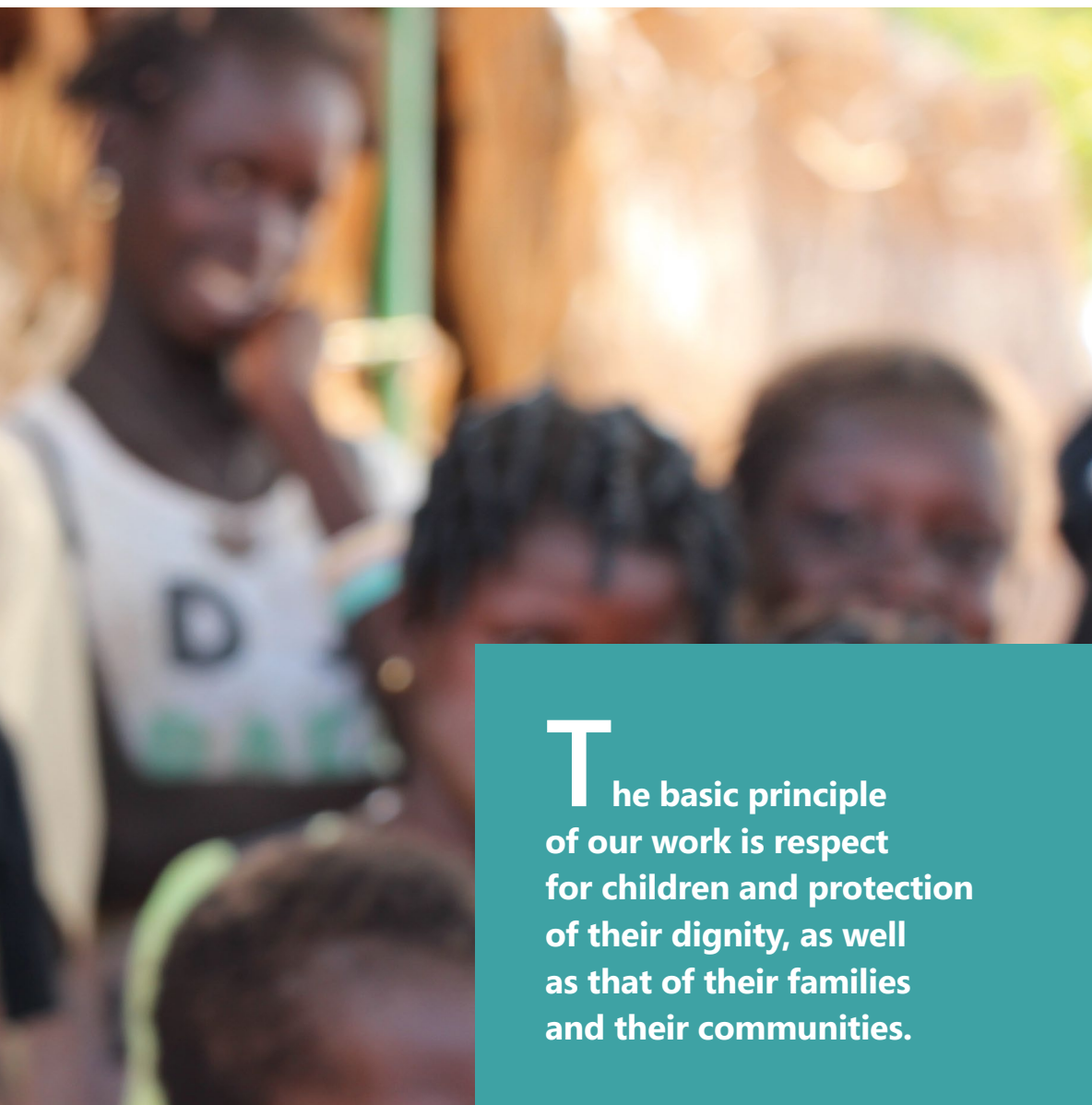
- All visitors must provide an inclusive, safe and positive treatment environment. In the case of reports made by external media staff and/or photographers, the journalist must respect the right of the child or children to refuse, cancel or stop the interview at any time.
- Before proceeding with collecting information (for example, for carrying out a report or the writing of life stories) or capturing any images (photographs or video), informed consent must be obtained from the child, as well as informed consent in writing from the parent or legal guardian. A clear explanation of how the information and/or images (photographs or video) collected will be used: why, for what purpose, potential channels in which it will be disseminated if it is the case.
- It must be ensured that the information and images (photographs or video) collected honestly represent the context and facts and are not forced or manipulated.
- It must be guaranteed that the images (photographs or video) project a balanced, respectful and dignified image of the children. They must be presented as rights holders and agents of change, even if they are in a vulnerable situation, and in particular in the case of crises or disasters, any kind of sensationalist image must be avoided, and they must not be shown as the passive beneficiaries or recipients of an intervention.
- No images (photographs or video) must be captured of children who are naked or dressed inappropriately.
- Interviews about issues relating to violence against children should only be carried out with children who have fully overcome the violent situation, in order to minimise the risk of revictimization.
- In the case of children in vulnerable situations who have experienced violent and/or exploitative situations and where there is a high risk of harm or trauma, alternative images (photographs or video) should be used to illustrate the information about these children, and their faces should not be shown under any circumstances.
- In the case of the board of trustees and the Educo staff team, the capturing of images (photographs or video) is strictly reserved for professional use.

b. Information and image usage

- Information and/or images (photographs or video) that have not been obtained according to that established in the previous section 7.a: Collecting information and images, cannot be disseminated.
- Any information that could lead to the identification of a child and put them at risk cannot be made public, especially in the case of victims of violence: name, surname, date of birth, address, place of study, name of father, mother, caregiver or legal representative, other sensitive information (such as health conditions or other data that may cause stigmatization) or excessive detail. In particular, any sensitive information that may appear in document titles or photograph captions and metadata¹⁴ must be eliminated.
- In the case of child sponsors, some information can be provided, like the name and surname of the child and their parents, caregivers or legal guardians, the name of the education centre they attend and the grade or year they are in, but not their home address or that of members of their family or any other sensitive information.
- The members of the board of trustees and the Educo staff team should follow the guidelines established institutionally regarding the use of information and images.
- In terms of information and communication technology, in all Educo workplaces firewall and filtering software must be installed to block access to inappropriate and/or offensive websites.
- If inappropriate and/or offensive material is received, the Educo IT Department must be informed immediately, and this material must never be forwarded.

14. Data that can be used to locate other data and, in particular, information on the geographical location and the date on which the photograph was taken.





The basic principle of our work is respect for children and protection of their dignity, as well as that of their families and their communities.

- It must be guaranteed that all the people included in the scope of this policy (see section 4. Scope) receive adequate and sufficient information about the appropriate use of information and communication technology, including social media and mobile telephones.
- In the case of children that use social media or other types of technology in the framework of the programs, projects, campaigns or other Educo activities, the people responsible for the activity must train the children beforehand in the risks that exist, for example in order to avoid being identified or sharing their geographical location. Equally, it is important to insist that they always report suspicious contacts and that they do not meet up with anyone that they have met online.
- Educo saves the personal information, images (photographs and videos) and any other material about child participants in programs, projects, campaigns or other activities in a safe place, taking all the necessary precautions to guarantee its safety. Access to this information, images or material is restricted to authorised users.

Responding to concerns, suspicions or incidents

All the people included in the scope of this policy (see Section 4: Scope) have a responsibility and an obligation to report any relevant information if they have reasonable causes to suspect that a child is suffering from harm or is at risk from suffering: any concern, suspicion or incident relating to behaviour that contravenes the Child Safeguarding Policy must be reported within 24 hours of becoming aware of the situation, using the relevant established procedures. Similarly, Educo must issue a first initial response within 72 hours of receiving a report.

In country offices, all possible actions will be undertaken to guarantee that children can report concerns, suspicions or incidents in a way that is adapted to their characteristics, starting with the sharing of this policy, along with a detailed explanation of its scope and objectives.

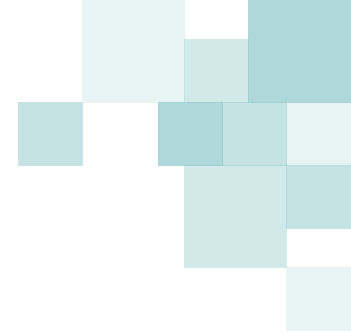
In the case of situations which are not explicitly covered by this policy, common sense and the best interests of the child should be applied.

The reporting of concerns, suspicions, or incidents will not damage the person's contractual relationship with Educo unless proper investigation shows that there was bad faith in the reporting. Similarly, if a person consciously chooses not to report a concern, suspicion, or incident, he or she may be subject to disciplinary action, including possible termination of the relationship with Educo.

All anonymous notifications are accepted and taken seriously. However, Educo does not encourage anonymity, because in these cases the follow-up processes of investigation and personalised responses are made extremely difficult. It could make it impossible to adequately investigate something if the person or team responsible for the investigation cannot obtain additional information from the person who has reported or determine whether the notification was made in good faith. Additionally, a situation could arise in which enough evidence cannot be gathered (or corroborated) to substantiate the allegations. Therefore, Educo develops informative and awareness-raising campaigns about these issues in order to promote the presentation of notifications that are NOT anonymous.

The concerns, suspicions and incidents can include the following types:

- Direct observation of a case of violence against a child.



- Revelation or indication by third parties of a case of potential violence against a child.
- Breach of this Child Safeguarding Policy or its associated procedures on behalf of a person included in its scope (see section 4: Scope).
- Knowledge of legal/judicial procedures related to violence against children that have been applied to any person included in the scope of this policy (see section 4: Scope).

All the notifications received are considered with equal seriousness, although they will require different response actions depending on which of the categories mentioned above they fall into, and depending on the seriousness of the allegations.

Child safeguarding focal points should be designated at global, regional, national and local levels (if there are local offices in the country and/or in case of emergency response deployment), incorporating in the selection process, where possible, the opinion of the children and adults participating in Educo programmes, projects, campaigns and activities. Similarly, for each of these positions a delegate should also be designated, in case the main person is absent or in the case of a conflict of interest in a particular situation.

These child safeguarding focal points are the people responsible for receiving notifications, activating the relevant procedures and providing advice in relation to child safeguarding risk assessment and management. Therefore, they must be duly trained and accompanied, in order to guarantee the utmost quality in the institutional responses to cases of violation of children's rights or breach of this Child Safeguarding Policy.

All the parties concerned (Educo staff or local partner organisations, children, their families, etc.) must know exactly which people are designated as child safeguarding focal points.

In the case of a concern, suspicion or incident, the Basic Reporting and Response Procedures must be activated (see *Annex 5: Basic reporting and response procedures in the case of concerns, suspicions and incidents*). Each regional and country office must adapt these basic procedures and define their reporting and response procedures to include, in a detailed and clear way, the internal communication channels and the tasks and responsibilities of all the people involved. These procedures must be elaborated in accordance with the local context, any applicable legislation and the national child protection system. Similarly, for the registration and monitoring of a case *Annex 6: Concerns, suspicions and incidents registration* form should be used, which can also be adapted according to specific contexts, but must always contain the sections indicated and the minimum information required.

During the reporting and response processes special attention must be paid to the following aspects:

- It is essential to document in writing all the concerns, suspicions or incidents which are reported, in order to maintain a register and to monitor the registered cases, as well as for accountability purposes regarding how these have been investigated.
- It is vital to ensure the confidentiality of the notifications and all the actors involved, this being a joint responsibility which includes the people that report right up to the people in charge of assessing and/or investigating, where applicable, and making decisions. In each step of the process special measures should be taken aimed at guaranteeing this confidentiality, at the same time as sharing the information with the relevant parties.
- The safety of the children should be prioritised by taking immediate protective measures adapted to the specific situation and risk, always taking into account the best interests of the children involved.
- The protection of Educo staff must also be guaranteed (through the relevant institutional protection and security plans) as well as any other party involved.
- It is the organisation's responsibility to adequately accompany the child safeguarding focal points, including the provision of psychological support in the situations that require it.
- Depending on the case and the context, the responsible parties can decide if they carry out, as well as an extensive assessment, a formal investigation procedure (see *Annex 5: Basic reporting and response procedures in the case of concerns, suspicions and incidents*). It is important that the formal investigations are carried out solely by specific teams made up of trained professionals, different from the child safeguarding focal points. These formal investigations can be external or internal (as long as they are undertaken by properly trained and qualified staff).
- In the event of a possible offence that breaches the applicable law, Educo must ensure the best interests and the safety of children at every step. The decision about reporting something to the competent authorities must be taken at the highest executive level (see *Annex 5: Basic reporting and response procedures in the case of concerns, suspicions and incidents*) and must include specialised legal advice; it must be well-founded and be registered clearly and comprehensively.
- In the event that a concern, suspicion or incident has been brought to the attention of the competent authority, Educo must halt any investigation of its own, whether it is internal or external, and collaborate with the relevant authorities in the event that this is necessary.



- When a case of concern, suspicion or incident involves staff from a local partner organisation, Educo must make contact with the legal representatives of the organisation in question in order to make joint decisions, as established in *Annex 5: Basic reporting and response procedures in the case of concerns, suspicions and incidents*.
- Educo should also assist in responding to concerns, suspicions or incidents that arise in the communities it works in, even if not directly involved as an actor, by identifying the type of support required, by supporting the referral of the case to the most appropriate body, as well as by assisting in the collection of follow-up information and in informing the relevant authorities. For the management of this type of situation the *Basic Reporting and Response Procedure for External Cases* should also be applied (see *Annex 5: Basic reporting and response procedures in the case of concerns, suspicions and incidents*).

Recruiting, employing and managing staff (including staff that provide external services)

The commitments undertaken in this Safeguarding Policy must be reflected throughout the human resources management cycle.

In particular, during recruitment processes, Educo must employ those people that best guarantee the safeguarding and positive treatment of the children it works with, also ensuring that the selection criteria include and emphasise the necessary experience for jobs that involve direct contact with children.

In this way, the highest standards are applied in all recruitment processes to guarantee the suitability of the candidates to work with children and their understanding of the concepts of protection, safeguarding and positive treatment of children. These processes include strong checks based on the verification of identities, reference checks (at least two) and the consultation of criminal records and/or police records, as long as the specific legislation in each country permits it. If this is not the case, the candidate will be required to provide a statement about their criminal history.

More detailed information can be found about this in *Annex 7: Recruiting, employing and managing staff (including staff that provide external services)*.



All of us share the
responsibility of fulfilling the
institutional commitment to
safeguarding children.

Awareness raising and training

All the actors included in the scope of this policy (see section 4: Scope) must receive training about it, adapted to the level of contact with children that each of them have, and in accordance with their general responsibilities in the organisation, as well as with those specific to the area of safeguarding.

The people that make up the board of trustees and the Educo staff team must receive an initial orientation about this during the process of joining the organisation, which is then strengthened by applying awareness raising, updating and ongoing training plans that ensure that they have the necessary skills to adequately apply the policy. The country office must develop, with the support of the regional teams and the Global Commission for the Child Safeguarding Policy (see section 12: Implementation, monitoring and revision of the policy), these plans for awareness-raising, updating and ongoing training, so that they are adapted to each context and each local legislative framework.

In particular, staff with explicit responsibilities in the area of protection, safeguarding and positive treatment must receive specific comprehensive training within the first six months of joining the organisation. Equally, all staff that work in direct contact with children must receive training about how to manage a hypothetical situation in which a child reports about a concern, suspicion or incident.

Similarly, intensive work must be done to disseminate the policy among the other interest groups concerned: actors included in its scope (see section 4: Scope), local authorities, educational communities, communities in general and, in particular, children themselves. To do so, it is necessary to rely on the adequate support material, like translations of the policy in various languages and friendly versions of the policy that are more accessible and adapted to the different stakeholders.

Local partner organisations and associated responsibilities

Educo must guarantee that the children who participate in the programs, projects, campaigns and activities organised by the local partner organisations enjoy the standards of child safeguarding that this policy establishes. Therefore, all the Educo local partner organisations must comply with it.

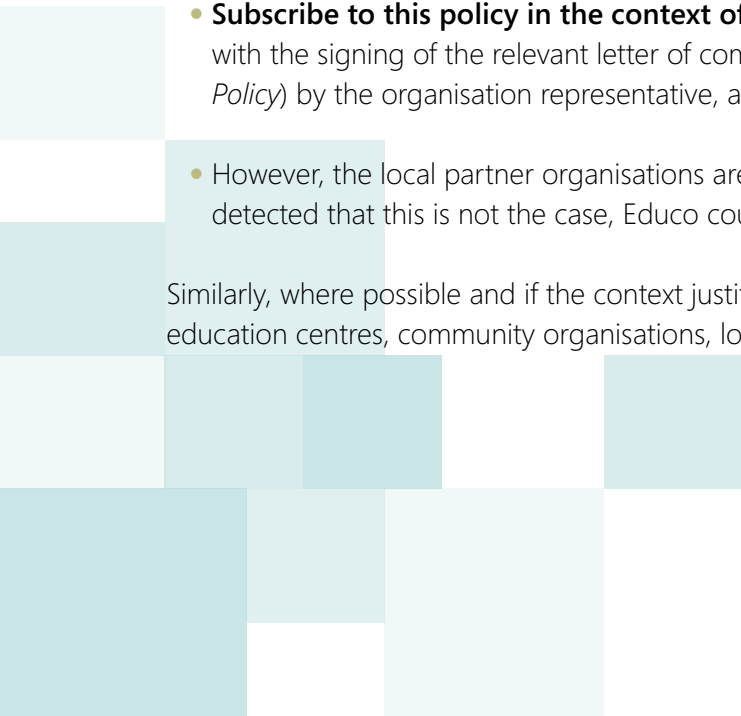
Educo must:

- Encourage local partner organisations to undergo training and promote the existence of a debate and ongoing monitoring regarding the safeguarding and positive treatment of children.
- Encourage local partner organisations to have their own Child Safeguarding Policy coherent with this document and provide the necessary support for their elaboration and implementation.

The local partner organisations must:

- **Subscribe to this policy in the context of all the projects, programs, campaigns and activities that are implemented jointly**, and document this with the signing of the relevant letter of commitment for the Child Safeguarding Policy (see *Annex 1: Letters of commitment to the Child Safeguarding Policy*) by the organisation representative, as well as all the staff that participate in the program, project or activity in question.
- However, the local partner organisations are expected to **behave in a way that is coherent with this policy throughout all their activities**. If it is detected that this is not the case, Educo could contemplate terminating the relationship.

Similarly, where possible and if the context justifies it, Educo should promote the development and implementation of child safeguarding policies in education centres, community organisations, local governments and similar institutions.



Implementating, monitoring and reviewing the policy

Every single person that is part of Educo, from the board of trustees to the executive committee and the whole staff team, share the responsibility of working in favour of safeguarding and positive treatment, through compliance with this policy and the promotion of actions of ongoing improvement that enable progress.

In fact, the issues related to child safeguarding should have a permanent space in the meetings that the board of trustees and the executive committee have, in order to guarantee the strategic role that these issues have in the organisation and its work.

In addition, a series of specific structures have been set up to manage the implementation and monitoring of this policy more directly.

On a global level, a Global Commission for the Child Safeguarding Policy has been created, made up of several members that represent the entire organisation, whose main duties include:

- **Promotion, awareness raising and training:** sharing this policy with all the actors included in section 4: Scope, alongside awareness-raising activities and ongoing training, as described in section 10: Awareness raising and training.
- **Implementation:** implementation of the policy and its corresponding action plan, while ensuring that its principles are fulfilled and applied.
- **Monitoring and evaluation:** regular monitoring and evaluation of the application of the relevant action plans, through the analysis of the indicators they include. In addition, it is important to note that Educo has an Audit and Compliance Unit, one of whose tasks is to verify the correct implementation of the internal policies.
- **Capitalisation:** systematisation and sharing of good practices and lessons learned.
- **Reviews:** this policy will be reviewed every three years, and the possible modifications will be presented to the executive committee and then to the board of trustees for validation.

Child safeguarding committees have also been created in each Educo country office, as the bodies responsible for the implementation and monitoring of the policy at that level and which work in coordination with the Global Commission.

One of the tasks of the Country Child Safeguarding Committees is the elaboration of semi-annual reports about the progress achieved in the implementation of the policy, the existing challenges, and the notifications received, and cases dealt with, which are written in accordance with the established confidentiality rules. The Global Commission receives these reports and issues an annual document that compiles all of this information, in order to communicate and be accountable to the entire organisation and guide the subsequent action plans.

Lastly, as mentioned previously, both in the head office and at a regional level, in country offices and in local offices, there are specific people designated as child safeguarding focal points, who provide guidance about child safeguarding, receive notifications about concerns, suspicions and incidents in the area of child safeguarding and respond with diligence by activating the procedures that must be followed.

The specific responsibilities of all the key people, areas and structures in the implementation of this policy are described in detail in *Annex 8: Specific responsibilities for the implementation of the Child Safeguarding Policy*.



Bibliography

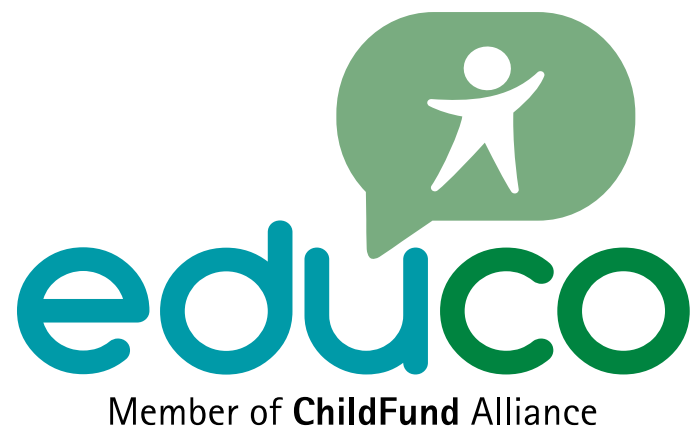
- United Nations (1989). *Convention on the Rights of the Child*.
- United Nations (2002) Resolution S-27/2 *A World Fit for Children*
- General comment no. 13 (2011) from the Child Rights Committee: *the right of a child not to be subjected to any form of violence*.
- ChildFund Alliance (2017). *Child Safeguarding Policy Guidelines*
- CAFOD (2015). *Child Protection Policy*
- Keeping Children Safe (2014). *Standards for Child Protection and how to implement them*.
- Keeping Children Safe (2011). *Tool 1. Standards for Child Protection*
- Keeping Children Safe (2011). *Tool 3. Training for Child Protection*
- Keeping Children Safe (2011). *Tool 4. Children's Participation in Child Protection*
- Keeping Children Safe (2014). *KCS Standards and how to implement them*
- Keeping Children Safe (2014). *Child safeguarding guidance for journalists and filmmakers*
- Plan International (2016). *Plan Policy: Child Protection* https://plan-international.org/sites/files/plan/field/field_document/annex_b.pdf
- Save the Children Australia (2014). *Child Protection Policy* http://www.savethechildren.org.au/_data/assets/pdf_file/0004/5458/Child-Protection-Policy-2014.pdf

- Terre des Hommes (2015). *Child safeguarding Policy*
- SOS Children International (May 2008). *Child Protection Policy*
- Unicef, Stage 1. Introducing child protection <http://www.unicef.org/violencestudy/pdf/CP%20Manual%20-%20Stage%201.pdf>
- Davey, C. and Nolan, S. (2014). *Girl Safety Toolkit: A Resource for Practitioners*. Girl Hub. <https://www.viva.org/wp-content/uploads/2017/10/Girl-safety-toolkit.pdf>




ANNEXES


- Annex 1. Letters of commitment to the Child Safeguarding Policy
- Annex 2. Internal cases of breach of the Child Safeguarding Policy and associated measures
- Annex 3. Tools for risk assessment and management
- Annex 4. Interviewing children and adolescents using a rights-based approach
- Annex 5. Basic reporting and response procedures in the case of concerns, suspicions and incidents
- Annex 6: Concerns, suspicions and incidents registration form
- Annex 7. Selecting, contracting and managing staff (including staff that provide external services)
- Annex 8. Specific responsibilities related to the implementation of the Child Safeguarding Policy



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