



CHILD SAFEGUARDING POLICY

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Scope and Purpose

Reaffirming the organisational and behavioural principles, commitments and obligations set out in the overarching INTERSON Safeguarding Framework, this policy specifically sets out INTERSON's approach to the **Safeguarding of Children** and should be read in conjunction with INTERSON's Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) for adults in the communities in which we work and INTERSON's Dignity at Work Policy for misconduct in the workplace. This policy applies to all INTERSON employees (international, national personnel and at country, regional and HQ level), interns, volunteers, consultants, contractors, board members, plus accompanying partners, and family members of international staff. Whenever employees or staff are mentioned in this document it is intended to include all these groups of people. This policy does apply not only to our organisation, but it extends to cover those we work with. Both INTERSON's staff and partners having agreements in place with INTERSON are expected to comply with the principles and reporting requirements outlined in this Policy. Through partnership agreements, INTERSON shall ensure that Child Safeguarding is part of the due diligence processes for these organisations and seek assurances of their application. For the purposes of this policy, unless otherwise stated, INTERSON adopts the following definitions:

Child: In line with the United Nations Convention on the Rights of the Child (UNCRC), INTERSON defines a 'child' as "every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier" (1989, Article 1). While INTERSON respects and adheres to national laws in countries of operations, this policy does not define a child based on the legal age of majority. The Committee on the Rights of the Child, the monitoring body for the Convention, has encouraged States to review the age of majority if it is set below 18 and to increase the level of protection for all children under 18.

Child Protection: "The prevention of, and response to, abuse, neglect, exploitation, harmful practices and violence against children". It is embedded in the Convention on the Rights of the Child and the Sustainable Development Goals. Child protection is about making *the world* safe for children. It refers to actions to protect specific children from concerns of risk or harm.

Child safeguarding refers to all the actions INTERSON takes to keep all children it comes into contact with safe and includes the proactive measures put in place to ensure children do not come to harm as a result of any direct or indirect contact with INTERSON. Child safeguarding is about making *INTERSON* safe for children.

Policy Statement

INTERSON has a **zero-tolerance** policy towards any forms of violence, exploitation, abuse, neglect, and harassment of children. In many of the contexts in which INTERSON works (such as extreme poverty, conflict, and natural disasters), there can be an increased risk of child abuse, neglect and exploitation. INTERSON has the responsibility to safeguard and protect the children we work with,

are in contact with, or who are affected by our work and operations, in and outside of the workplace, whether during or outside of working hours, and expects all its employees (international, national personnel at country, regional and HQ level), interns, volunteers, consultants, contractors, suppliers, implementing partners, board members, plus accompanying partners and family members of international staff to adhere to the principles, values and commitments in their work with or through INTERSOS as outlined in this policy as well as in INTERSOS Charter of Values and Code of Conduct and within the United Nations Convention on the Rights of the Child (UNCRC).

Application

a) Core principles

This Policy is underpinned by the following core principles:

- The **safeguarding and well-being of children** is INTERSOS' **first priority**. This takes precedence over all other considerations.
- INTERSOS strictly **prohibits staff and other representatives from engaging in any kind of sexual activity with children** (defined as anyone under the age of 18, or older if the local law indicates this). Mistaken belief of age is no defence. Breach of the policy shall lead to dismissal and can result in criminal prosecution.
- INTERSOS strictly prohibits staff and other representatives from engaging in or promoting any form of **abusive, exploitative or harmful behaviour** towards children.
- **All children**, regardless of age, disability, gender, religious belief, sexual orientation, or identity, have the **right to equal protection** from all types of harm and abuse and will be treated equally by INTERSOS.
- All INTERSOS programmes and activities shall be designed with the intention of **maximising the safeguarding of children** and encouraging them to talk about things which make them unsafe or concerned.
- **No staff member shall ever agree, negotiate, or assist any settlement** (financial or otherwise) between the family of a victim of abuse and an alleged perpetrator. Such cases shall be reported immediately.
- INTERSOS will **not hire or employ anyone with a prior conviction** for child abuse, paedophilia, or related offence. In the case that applicable national laws prohibit this rule, no person with such a conviction shall be hired, or permitted to hold a position with implies direct contact with children or access to their personal information, including photographs.
- When an INTERSOS staff and associates develops **concerns or suspicions regarding** any form of **abusive, exploitative, or harmful behaviour** towards children, he or she must immediately report such concerns via the established reporting mechanisms. Not doing so can lead to disciplinary action up to and including dismissal.
- Any staff member or other representatives planning an event, performance or visit which may involve children (anyone under the age of 18) shall engage with INTERSOS staff with safeguarding responsibilities to ensure that the event or visit is appropriately managed to ensure it does not place children in harm.

- All INTERSOS staff and associates shall ensure that the use of technology does not expose children to risk of harm through a failure to **secure sensitive data or the misuse of technology itself** (i.e., accessing indecent or inappropriate material)
- All INTERSOS staff and associates shall abide by INTERSOS **Ethical Images Policy** at all times.

All INTERSOS personnel are obliged to adhere to these standards of behaviour. Failure to comply with these standards or failure to report child protection concerns is grounds for disciplinary action pursuant to the INTERSOS Charter of Values, Code of Conduct, Safeguarding Framework and Associated Policies. This action may include **termination of contract or summary dismissal** and may result in the case being forwarded to local authorities for **criminal prosecution** when appropriate and in accordance with applicable national laws.

b) Commitments

INTERSOS will meet its duty of care to protect children from harm through Prevention, Reporting and Responding.

1) Prevention:

Safe recruitment: In compliance with applicable laws, INTERSOS is committed to prevent perpetrators of harm to children from being hired, (re)hired or (re)deployed. Managers and Human Resource teams shall ensure robust recruitment screening processes for all personnel, including employees, volunteers, consultants, and other representatives. This includes:

- **Job descriptions** for all positions will make reference to responsibilities to comply with Safeguarding and Protection of Children, Code of Conduct, and other specific policies relevant to the position advertised- and shall include links to INTERSOS' policies.
- **Advertisement** shall make clear INTERSOS' commitment to Child Safeguarding and Protection
- **Shortlisting** – INTERSOS will scrutinise information in applications/CVs – aimed at resolving any gaps, discrepancies, or anomalies in employment history.
- **Interviews** shall include questions around Child Safeguarding, the Code of Conduct and working with children.
- **Checks** – INTERSOS will verify the successful applicant's identity, their employment history and qualifications. Offers shall not be confirmed until all checks have been completed.
- At least two professional **references, including from the last line manager**, shall be obtained and any concerns followed up.
- Information on eventual disciplinary measures related to safeguarding allegations shall be requested in the references and information shared as part of the **Disclosure of Misconduct Scheme**¹

¹ The Inter-Agency Scheme for the Disclosure of Misconduct establishes a minimum standard for organisations to share information as part of their recruitment process about people who have been found to have committed sexual abuse, sexual

- **External checks** shall be conducted by INTERSOS prior to confirmation of offers. This includes a criminal record check or equivalent in the country of origin and anti-terrorism checks if required by the donor. Should none of the above be available in the country of origin, a personal declaration stating any criminal convictions, including spent convictions will be used in lieu. All staff will have their criminal record check renewed every three years and/or when they change roles to one which carries a new Child Protection level. For newly recruited staff, the criminal record check should not be done more than three months prior to their initial deployment.
- **Staff Training:** All new staff and partners shall be given **an induction** which includes a training on the standards of behaviour within the Code of Conduct, Child Safeguarding and Protection policy and related policies. New managers shall be provided with further support regarding the implementation of these policies. Staff shall also be reminded of the contents of this policy during the **safeguarding refresher training carried out annually**. In addition, relevant training will be provided to those with specific Child Safeguarding and Protection responsibilities e.g., HoMs, Protection and HR Managers responsible for conducting investigations and staff with safeguarding responsibilities.
- All staffs, volunteers, community committee members, interns and consultants will be **required to acknowledge in writing the receipt, understanding and commitment to the Child Safeguarding Policy** and related standards of behaviour prior to commencement of their contract/ placement. The signed statement of commitment to the CS Policy will be kept on file together with the signed employment or collaboration contract.
- An assessment of the individual's commitment to comply with and promote implementation of the CS Policy will be included in the standard internal **performance review** process cycle

Safe Partnerships Agreements: INTERSOS will not enter into contractual agreements for the supply of goods, services or works with contractors or partnership arrangements with entities – international or national, humanitarian, or institutional - which are known to utilise child labour or are involved in any other practice that can harm or is likely to cause harm to children.

- As part of the pre-qualification and bidding processes, all potential contractors shall be required to submit the **Supplier/Tenderer's Declaration** stating that they are aware and formally agree to abide by INTERSOS Code of Conduct and Safeguarding Framework, including the CS policy.
- Whenever possible, an independent **background check** of the contractor's business practices shall be conducted to inform the pre-qualification assessment or bid analysis.
- For partners, INTERSOS will conduct **due diligence assessments** on partner capacity to safeguard and protect children from any form of harm prior to signing a partnership agreement or sub-agreement.
- Partners which do not have their own robust CS Policy shall be required to sign up to the **INTERSOS CS Policy** as a condition for any partnership arrangement.

exploitation or sexual harassment "Misconduct" during employment. It complements the work that organisations are already doing as part of their recruitment processes.

- Where necessary, INTERSON will provide **capacity development** and support to partners on CS as part of entering into any new partnership.
- Child safeguarding **ethics clauses will be integral part of any supply, service, works and partner contract**, where it will be expressly stated that the failure of those entities or individuals to take preventive measures against child abuse, neglect, and exploitation, to investigate and report allegations thereof, or to take corrective actions when an incident has occurred, shall constitute grounds for INTERSON to terminate such agreements.

Safe programmes: All INTERSON programmes shall be designed and implemented to minimise actual or potential risks of harm to the children they come into contact with or impacted upon directly or indirectly. This includes conducting programme and projects risks assessments, embedding good practice and mitigation measures throughout the programme and project cycle (project design, grant proposals, assessments, complaints and feedback mechanisms, and monitoring and evaluation) to avoid any risk of harming children.

- Each country programme shall strengthen **Child Safeguarding risk analysis** and integrate Child safeguarding considerations into the design of needs assessment and new project proposals, including identification of activity-specific Child Safeguarding risks and related mitigation measures.
- **CS context analyses and referral mapping** shall be completed at country level so that the programme knows how to refer complaints to local authorities, welfare, and social services as needed.
- Each country programme shall allocate **dedicated resources** (human and financial) for CS activities in country programmes' budgets.
- INTERSON Missions will work directly with children, their caregivers and communities to **promote understanding of community-based childhood development, child rights and child safeguarding and protection** including through the establishment and support of community committees on child protection and child rights clubs and encourage children's participation in decisions that affect their lives, including participation in the design, monitoring and evaluation of INTERSON's activities and reporting mechanisms.
- When operating **interim institutional care arrangements** and/or working with foster families, INTERSON will develop specific child safeguarding SOPs based on international best practices and review them regularly.

Safe communication: INTERSON has a **duty of care** towards the beneficiaries of its programmes and at all times must put their **best interests** first. Beneficiaries have the right to be accurately represented with their own identity and dignity preserved. The "**Do No Harm**" principle must guide the collection and use of images and information about beneficiaries.

- Ensure that appropriate procedures, protocols, and processes are established and followed for **ethical collection, storage and use of children's stories, interviews, photos, videos, and images** including protocols on managing personal data relating to children so as to not put

children at risk, guarantee their protection, ensure to “do no harm” and respect the child’s dignity and privacy, **including on all social media.**

- Provide for the **safe use of information and communication technologies** such as the Internet, social networking sites, and digital photography so as to not put children at risk.
- Conform to the highest standards of children’s rights (UNCRC) and encourage children to give their own accounts as much as possible.
- Take and use images and stories only with the full **understanding and permission of the child or his/her parent/legal guardian/caregiver.** The informed consent needs to be signed (or verbally agreed to and recorded) and filed in a secure location.
- **Do not disclose personal information** (such as location) and names of the children to protect their identity unless they/their parent/legal guardian/caregiver have explicitly stated their agreement that their genuine name should be used, and there are no security implications
- Report in a timely manner any complaint or concern about inappropriate or intrusive images through the same procedures as for reporting child protection concerns.
- All media folders and photographs need to be **stored in a secure area** to which a limited number of people have access on a need basis.

2) Prompt, safe, and survivor-centred reporting

- Each INTERSOS Mission, through his/her Head of Mission and Accountability officers where present, will be responsible to ensure that complaint mechanisms for reporting child protection concerns are developed and integrated within existing complaint and feedback structures at the field and country level.
- Complaint mechanisms for reporting child protection concerns shall be developed and regularly reviewed with the **involvement of children, caregivers, and communities.**
- **Reporting, using one of INTERSOS channels, is mandatory and must be immediate** (within 24 hours of becoming aware of an alleged incident)
- **Awareness raising** on CP risks among local communities is mainstreamed across all INTERSOS programs. Communities, including children and caretakers, shall be sensitized on the importance of denouncing any abusive, violent, exploitative, and harmful behaviour towards children and shall be aware of the strict ban on staff and partners engaging in such behaviour and of the mechanisms in force to report any misconduct.
- **Multiple channels** are in place for INTERSOS’ representatives, partners, and community members we work with, and others to safely report CP concerns. These channels shall be designed **in consultation with children and caretakers,** to ensure that they are safe and accessible.
- Everyone working/collaborating with INTERSOS and the communities we work with have information on **how to access** these safe reporting channels, including messaging that is suitable for specific groups. This should include posting reporting procedures in **local languages** and regularly explaining these channels.

- Robust **induction and continuous training** and information to INTERSOS' representatives and partners shall be conducted to ensure they understand their obligations and how to discharge their duties should they receive a complaint related to Child Safeguarding
- **Child safety and wellbeing** must be paramount to reporting and their information treated confidentially. Whistle-blowers shall similarly feel safe and protected during the reporting process.
- Any intentionally false, malicious, or vexatious statement, misrepresentation, or accusation against another INTERSOS representative or third party will be subject to disciplinary action up and to including dismissal.
- **Complaints can be made anonymously.** Information that identifies individuals involved in a complaint shall be limited to personnel with the absolute need to have such information and will not be shared further without obtaining the **informed consent** of the survivor, except if someone's life is at risk, or as required by law in consultation with legal counsellor and when safe to do so. Non-identifying information shall be shared as per donor and regulatory body reporting requirements. Employees who breach **confidentiality** may be subject to disciplinary action up to and including termination of employment.

3) Prompt, safe, and survivor-centred response

- All reported allegations shall be **acknowledged within 48 hours**, and a safeguarding team shall convene a case conference to assess immediate risks and next steps within **72 hours**.
- INTERSOS will carry out **independent, safe, and discreet investigations** through trained investigators, recognizing the rights and duty of care to everyone involved, including whistleblower and/or survivor, witnesses, and the subject of complaint.
- The **safety and security of the child** and her/his caretakers if relevant is the primary consideration.
- INTERSOS will **identify GBV/CP case management services** provided by different agencies, organizations or structures at the base and country level and agree on SOPs for case referral to enable swift response should a child safeguarding/protection concern be reported.
- In responding to child victims, INTERSOS shall adopt a **child-sensitive approach** that takes into account the vulnerabilities and capacities of the child in a manner consistent with the Convention on the Rights of the Child: non-discrimination; best interests of the child; the right to life, survival and development; the evolving capacity of the child and their right to express one's views and have them considered.
 - As a primary consideration, a **determination of the best interests of the child** involves an ongoing assessment as to what would best protect a child's physical, psychological and emotional safety, security and well-being, and applies to decisions which affect the child as an individual, as a member of a specific group, and in general.
 - In cases involving children, informed consent includes the **informed consent of the child**, according to their evolving capacities, **and the child's parent, legal guardian or person acting in loco parentis**, except when informing the parents or caregivers could put the child

- at risk (of retaliation, violence, abuse and/or neglect). Consent should be explained at the outset and obtained prior to, or in conjunction, with the provision of assistance to child victims.
- During any investigation or legal process that may ensue, a **child victim/survivor should be provided with appropriate assistance**, which should include the accompaniment by a trained professional throughout the process when it is in the child's best interests.
 - As in the **case of any victim/survivor of sexual exploitation and abuse**, children shall be informed of the process and provided with clear information as to what to expect. This should include the provision of psychosocial support during information-collection and investigations. Interviews with children shall be conducted in a way that is sensitive to the developmental stage and capacities of the child by properly trained persons on interviewing in a child-sensitive manner.
 - The **views of the child** are important in the decision-making process and shall be considered a significant factor in the settlement of the issue concerned.
 - Child victims/survivors shall receive **equal and fair treatment** regardless of their age, gender, race, religion, nationality, ethnicity, sexual orientation, or any other characteristic.
 - INTERSOS will take **swift and appropriate action** against INTERSOS staff and partners who are found to have committed harm towards children. This may include administrative or disciplinary action up to and including dismissal, and/or referral to the relevant local authorities if appropriate and safe to do so. An independent decision-making panel will be assigned in every investigation to ensure impartiality, transparency, and accountability (e.g. for country cases the panel may include people from outside of country): if the case involves a national staff member, the decision making panel will be appointed and chaired by INTERSOS Head of Mission; if the case involves an international staff, the decision making panel will be appointed and chaired by INTERSOS Director General or his/her delegate. The decision-making process will always be subject to scrutiny by the Global Safeguarding Coordinator.
 - All information related to the case shall be held in the **strictest confidence**, recorded and the record held in a **secure location** with the Head of Mission and/or other designated personnel. It shall be disclosed only on a need-to-know basis in order to resolve the matter. Any breach of the data protection and sharing protocols may be subject to disciplinary action, up to and including dismissal.

c) Roles and responsibilities

In addition to the roles and responsibilities outlined in the INTERSOS Safeguarding Framework, the following functions shall have dedicated responsibilities to help INTERSOS prevent and respond to CS concerns:

INTERSOS Board hold overall accountability for this policy and its effectiveness in practice.

All INTERSOS Directors are responsible for integrating its implementation into daily decisions and for promoting awareness of this policy within their departments.

All INTERSOS staff, partners and suppliers are obliged to adhere to these standards of behaviour. Failure to comply with these standards or failure to report CS concerns is grounds for disciplinary action pursuant to the INTERSOS Charter of Values, Code of Conduct, Safeguarding Framework

and Associated Policies. This action may include termination of contract or summary dismissal and may result in the case being forwarded to the local authorities for criminal prosecution when appropriate and in accordance with applicable national laws.

All INTERSOS Head of Missions hold overall responsibility for roll-out of the CS policy in their Mission. This includes:

- Creating a safe environment where staff and others feel comfortable to raise concerns without fear of retribution by setting a positive example both on and off duty and promote the global Child safeguarding policy.
- Ensuring at least one senior staff member has safeguarding responsibilities in the country programme.
- Ensuring CS risk assessment, context analysis and referral mapping are embedded in their programme.
- Ensuring all country programme staff receive an annual refresher training on safeguarding, including CS.
- Ensuring raised concerns are promptly reported to the Global Safeguarding Coordinator
- Ensuring adequate funding is in place to support CS and Safeguarding activities in their country (e.g., budget to ensure that all staff receive annual training, budget for translation of policies and other core documents to ensure they are accessible to all).

INTERSOS Global, Regional and Country Protection staff (where recruited) shall be providing technical support for the implementation of and adherence to the CS Policy at the global, regional and country level until dedicated staff with safeguarding responsibilities will be appointed. They shall also provide support on the development and revision of the country-specific CS strategies and related SOPs.

A **Decision-making panel** shall be appointed and meet on *ad-hoc* basis to provide oversight and management support for alleged CS Incidents

TO REPORT A CONCERN, YOU CAN:

- Do this verbally or in writing to your Line Manager, HR, Head of Mission, country programme staff with safeguarding responsibilities or
- Send an email to: complaint@intersos.org or
- Send a WhatsApp message to: +39 3808970033
- Fill an incident report and put it in one of INTERSOS feedback boxes.

For reporting a complaint at field level, please refer to the existing Complaint Response Mechanism in each INTERSOS mission, which includes a dedicated email address and phone number.

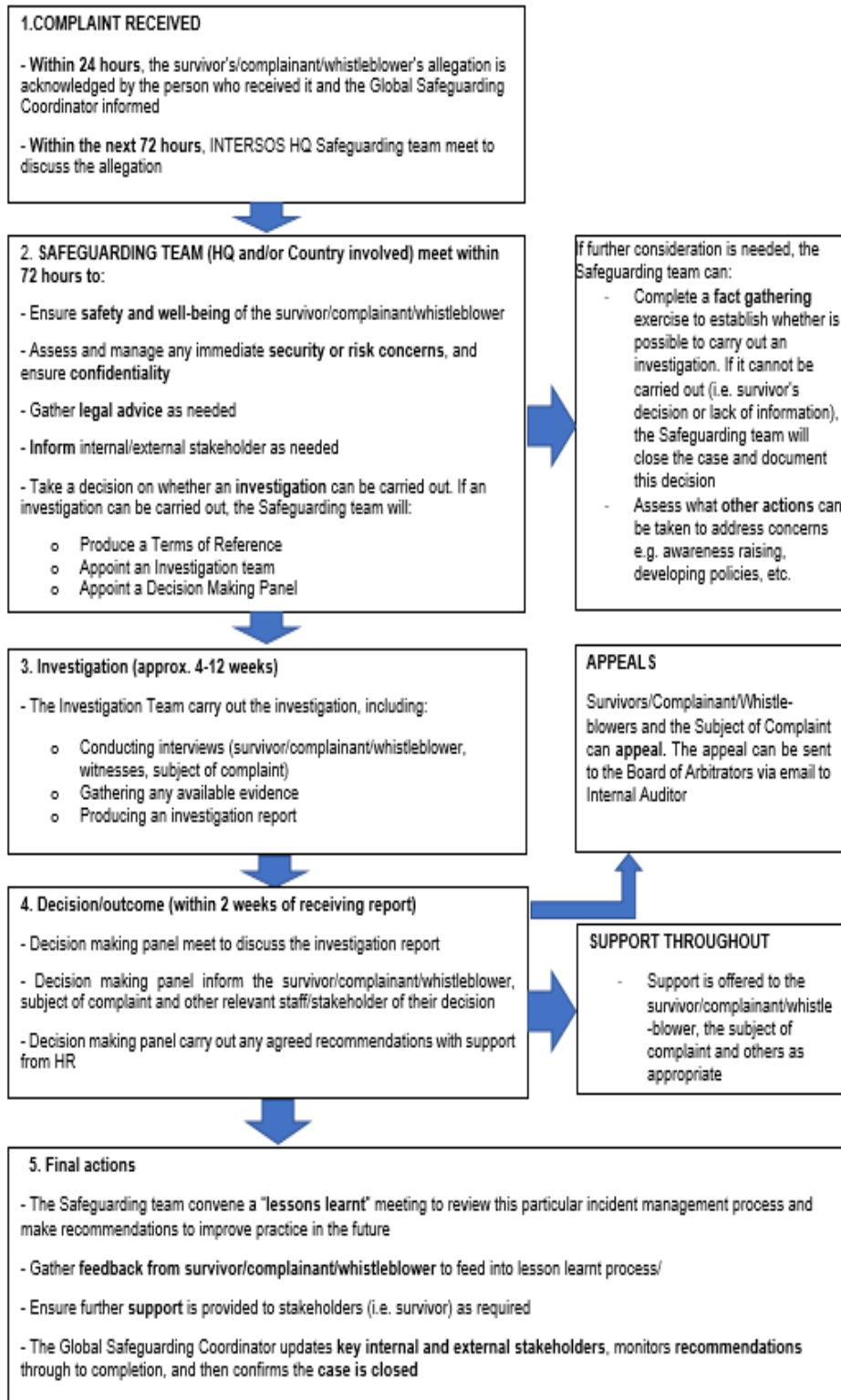
REPORTING FLOWCHART



- > The survivor/complainant/whistleblower can choose how to raise their concern
- > Everybody else must ensure that the concern is reported to the Global Safeguarding Coordinator as soon as possible

It is MANDATORY for all INTERSOS staff and associates to report complaints, concerns, or suspicions of CS in accordance with the established procedures. This includes acts or omissions resulting in placing a child at risk of harm, or an act of harm itself. If an INTERSOS staff or associate is aware of a CP incident involving INTERSOS staff or associates, or other humanitarian aid workers, and fails to report it, he/she may be subject to disciplinary action, up to and including dismissal or interruption of contractual or partnership agreement in case of suppliers or partners.

INCIDENT REPORTING FLOWCHART



References:

This Policy must be read in conjunction with: Code of Conduct, Charter of Values, Safeguarding Framework; Equal Opportunities Policy; Dignity at Work Policy; Anti-Modern Slavery Policy; Misconduct Policy; Whistleblowing and Investigation Policy, Conflict of Interest Policy, Ethical Images Policy, PSEAH Policy, Environmental and Data Protection Policies.

Approval and Dates:

This policy was approved on 6 December 2023. This version of the policy takes effect on 23 March 2024 and will be reviewed in 36 months' time.

Policy Owner:

Global Safeguarding Coordinator
