

**SAVE THE CHILDREN DEUTSCHLAND E. V.**

# **Child Safeguarding Policy**

**Spring 2017**



**Save the Children**



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# **Child Safeguarding Policy**

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## 1. Introduction

### 1.1 Child safeguarding: Definition, objectives and reasons

The protection of children from abuse and exploitation is a core task for Save the Children as the world's largest independent children's rights organisation. This also means that we do everything we can to protect children from such dangers within our own organisation. We do this by means of child safeguarding, i.e. institutional child protection. We make sure that:

- staff, staff of partner organisations and other persons who come into direct contact with children or their personal data through Save the Children Deutschland e. V. or through one of its partner organisations are committed, both generally and within their specific areas of activity, to clear standards for the protection of children.
- we raise awareness among staff and staff of partner organisations about children's rights and child protection.
- children and their families are informed about existing reporting and complaints mechanisms and their rights in association with these.
- the organisation has a standardised procedure so that cases of suspected abuse can be reported and investigated while maintaining confidentiality for all parties.

The basis for ensuring children are protected from harm in our organisation is our Child Safeguarding Policy which sets out corresponding standards. All measures that we derive from this Policy should, firstly, be preventative and minimise any risks for children within the course of our work and give us confidence in our actions. Secondly, they should responsibly ensure that when cases of suspected abuse arise, these are investigated thoroughly and that all parties affected – children, persons under suspicion, persons voicing suspicions and the people around them – are protected at all times, for instance from further abusive behaviour or slander.

The importance of systematic child safeguarding can be seen from the most recent official findings from public inquiries into abuse cases in Germany and other countries. These provide evidence that children who are supported or cared for by institutions are exposed to an increased risk of abuse. This also encompasses organisations in the field of development cooperation and humanitarian aid. Poverty, discrimination, crises, natural disasters and the power disparity between aid organisations and the local population can foster all kinds of discrimination, abuse and exploitation. At the same time, potential abusers repeatedly seek direct access to children through institutions – in Germany and all over the world.

### 1.2 Scope

The Child Safeguarding Policy applies to the following groups of people:

- full-time staff of Save the Children Deutschland e.V. including Senior Management and the Management Board, members of the General Assembly and the Supervisory Board, apprentices, temporary and freelance staff, student assistants, interns, school students, self-employed contractors and volunteers
- staff of partner organisations, i.e. of institutional donors, corporate and implementing partners, foundations and of other partner organisations who come into direct contact with children or their personal data through Save the Children Deutschland e. V. or through one of its partner organisations
- visitors to projects, programmes, events and campaigns that are promoted or organised by Save the Children Deutschland e.V.
- reporters, i.e. persons whose work for Save the Children Deutschland e.V. involves reporting in both traditional and social media.

Save the Children Deutschland e.V. is one of the national Save the Children organisations that are joined together in a global alliance called Save the Children International. The tasks of all member organisations, and hence of Save the Children Deutschland e.V., are the financing and management of international project activities, the

monitoring and evaluation of these activities, and the implementation of projects in its own country. On top of these come public relations work and political lobbying. The individual projects abroad are planned and implemented – always jointly with the member organisations that finance them – by country offices under the management and responsibility of the umbrella organisation. Within this framework the country offices, under the leadership of the umbrella organisation, are also responsible for developing and implementing local safeguarding standards and regularly monitoring and evaluating their implementation. In relation to Germany and Germany-based partner organisations, Save the Children Deutschland e.V. has the primary responsibility.

### 1.3 The child rights-based approach and child safeguarding

The work of Save the Children is child rights-based. By this we mean that realising the rights of children is not only the goal of our work but also determines the path we take to get there. In everything that we do, we take our guidance from the internationally recognised standards for human and children's rights, including the four fundamental principles of the United Nations Convention on the Rights of the Child: the right to life, survival and development, the primacy of the best interests of the child, the right to non-discrimination, and the child's right to be heard. Finally, we ensure that our work is aimed at strengthening duty-bearers and rights-holders in equal measure.

Our safeguarding work is likewise child rights-based. The Child Safeguarding Policy defines a legal framework clearly oriented to children's rights. Furthermore, the Policy helps to reinforce duty-bearers in exercising their competences. The aim is to enable them to fulfil their responsibility to respect and protect children and their rights. Also, measures are derived from the Policy which help to strengthen children and their families as rights-holders. These include informing children and their families about existing reporting and complaints mechanisms and associated rights so that they can claim these rights.

### 1.4 Legal framework

The right of children to protection from abuse and exploitation is anchored at international, regional and national level in various conventions and laws. These include:

- the United Nations conventions on human rights, particularly the Convention on the Rights of the Child along with its three Optional Protocols
- conventions of the International Labour Organization, for example the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour
- regional conventions such as the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse
- laws of the Federal Republic of Germany on the protection of children and young people, particularly Book Eight of the Social Welfare Law – Assistance for Children and Young Persons
- the relevant legislation of countries in which Save the Children works.

These laws and conventions serve as the legal frame of reference for the Child Safeguarding Policy. Furthermore, the Policy is aligned with the VENRO Code of Conduct for Children's Rights<sup>1</sup> and the safeguarding standards of the international network Keeping Children Safe. Last but not least, the Board of Save the Children International passed a Child Safeguarding Protocol for the entire organisation in 2010, from which this Policy – adapted to the German context – is derived.

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<sup>1</sup> Verband Entwicklungspolitik und Humanitäre Hilfe deutscher Nichtregierungsorganisationen e. V. (VENRO), VENRO Code of Conduct for Children's Rights: Protecting children against abuse and exploitation in development co-operation and humanitarian aid, 2011.

**Figure 1: Definitions of child abuse**

The World Health Organization view of child maltreatment differentiates between the following five forms of neglect and abuse which can pose a potential or actual risk to the health, development or dignity of the child:<sup>2</sup>

**Neglect and negligent treatment:** repeated or persistent failure by the responsible caregivers to provide the necessary care to meet a child's basic needs.<sup>3</sup>

**Physical abuse:** all forms of violence against children leading to physical injuries.

**Emotional abuse:** an attitude, comment or action by parents or caregivers who belittle, reject, isolate, ignore, degrade, threaten, terrorise or adultify the child and make him or her feel, for example, unwanted or worthless.<sup>4</sup>

**Sexual abuse:** sexual acts performed with or in the presence of a child either against his or her will or to which the child, being at a physical, emotional, cognitive or linguistic disadvantage, can unknowingly give consent.<sup>5</sup>

**Exploitation:** the economic or other exploitation of a child through activities carried out by the child for the benefit of a third party. These activities encompass exploitative child labour, child pornography and child prostitution as well as all other activities which carry risks, impede the child's education or could harm the child's health or physical, mental, emotional, moral or social development.<sup>6</sup>

## 2. Codes of Conduct for contact with children

Our aim is to ensure that children<sup>7</sup> receive the best possible protection from abuse and exploitation throughout the entire work of our organisation both in Germany and abroad. An important part of this is adhering to clear Codes of Conduct for contact with children within Save the Children Deutschland e.V. projects and programmes. Each Code of Conduct is intended to give us confidence in our actions and support us in establishing a safe environment for children.

The Child Safeguarding Policy contains Codes of Conduct for the following four groups of people:

- full-time staff of Save the Children Deutschland e.V. including Senior Management and the Management Board, members of the General Assembly and the Supervisory Board, apprentices, temporary and freelance staff, student assistants, interns, school students, self-employed contractors and volunteers<sup>8</sup>

2 World Health Organization, [http://www.who.int/topics/child\\_abuse/en/](http://www.who.int/topics/child_abuse/en/), retrieved on 22.03.2017.

3 Bayerisches Staatsministerium für Arbeit und Soziales, Familie und Integration/Bavarian State Ministry of Labour and Social Affairs, Family and Integration, <http://www.aerzteleitfaden.bayern.de/diagnose/vernachlaessigung.php>, (in German) retrieved on 22.03.2017.

4 Deutscher Kinderschutzbund/German Child Protection Association, Stellungnahme zu Gewalt gegen Kinder und Gewaltprävention [Statement on violence against children and the prevention of violence], 2012.

5 Bayerisches Staatsministerium für Arbeit und Soziales, Familie und Integration/Bavarian State Ministry of Labour and Social Affairs, Family and Integration, <http://www.aerzteleitfaden.bayern.de/diagnose/sexuelle-gewalt.php>, (in German) retrieved on 22.03.2017.

6 United Nations Convention on the Rights of the Child, 1989.

7 Following the United Nations Convention on the Rights of the Child, a child means every human being below the age of 18 years.

8 See Annex 1, "Code of Conduct for Staff of Save the Children Deutschland e. V."

- staff of partner organisations, i.e. of institutional donors, corporate and implementing partners, foundations and of other partner organisations who come into direct contact with children or their personal data through Save the Children Deutschland e.V. or through one of its partner organisations<sup>9</sup>
- visitors to projects, programmes, events and campaigns that are promoted or organised by Save the Children Deutschland e.V.<sup>10</sup>
- reporters, i.e. persons whose work for Save the Children Deutschland e.V. involves reporting in both traditional and social media.<sup>11</sup>

All the groups of people listed above are informed about the applicable safeguarding standards before having contact with children. They confirm with a signature that they have read and understood the Code of Conduct applicable to them and undertake to act in accordance with these provisions. Depending on how long or how regular the contact with children is expected to be, a case-by-case assessment will be made as to whether an enhanced criminal record check must also be supplied. It is the task of Save the Children Deutschland e.V. and the country offices locally, as the case may be, to ensure that the necessary precautions for compliance with the Code of Conduct are taken in a timely manner.

The wording of the Code of Conduct for Staff of Save the Children Deutschland e.V.:

1. I respect the rights of children and conform to the relevant legislation that applies at international, European and the respective national level.
2. I undertake to do everything I can to safeguard children from neglect and from physical, emotional and sexual abuse and exploitation.
3. I refrain from using language or behaviour that is violent, discriminatory, racist or sexist either towards children or in the presence of children.
4. I treat children as individuals with their own personalities and show them respect – regardless of, e.g. age, gender, origin, language, religion, skin colour, disability or political views.
5. I respect children’s opinions and concerns and give them a say in all matters affecting them, as appropriate for their age and their level of maturity.
6. I make sure that once children can do things of a personal nature unaided, they do these things for themselves – for example, going to the toilet or changing their clothes.
7. I respect the children’s guardians and am respectful of their responsibilities.
8. I ensure that when I have contact with children, a second adult is present or within sight or hearing at all times (“two adults rule”).<sup>12</sup>
9. I undertake to comply with the “Information and Guidelines for Reporters” during the preparation, dissemination and storing of media content.
10. I am careful and transparent about my role when dealing with children and their families, and do not abuse the power disparity that exists between aid organisations and beneficiaries and between adults and children.
11. I act responsibly to maintain safe physical and emotional boundaries and to avoid harmful forms of relationships with children, involving for example sexual abuse and exploitation.
12. I play my part in creating a culture of mutual responsibility in the workplace that enables any cases of suspected abuse arising at Save the Children Deutschland e.V. to be reported and dealt with confidentially for all parties.

<sup>9</sup> See Annex 2, “Code of Conduct for Staff of Partner Organisations”.

<sup>10</sup> See Annex 3, “Code of Conduct for Visitors”.

<sup>11</sup> See Annex 4, “Information and Guidelines for Reporters”.

<sup>12</sup> If this is not possible, there should be at least five children in the group. Supervising one child on his/her own is only permitted in exceptional situations for a short period of time.

13. I report any cases of suspected abuse that come to my attention in the course of my work for Save the Children Deutschland e. V. within 24 hours, confidentially, to the designated contact persons.

The Code of Conduct also states that Save the Children Deutschland e. V. will report every violation constituting a criminal offence to the police, irrespective of whether our own staff or third parties are involved. Violations not constituting a criminal offence may lead to disciplinary proceedings or other measures being initiated within the organisation, and – for staff members – may result in further steps being taken under employment law, up to and including dismissal.

### 3. Standards for informing children and their families about safeguarding

In order to ensure that we give children the best possible protection in the course of our work, it is essential to inform children about their rights. If children know about the existing reporting and complaints mechanisms and their associated rights, important prerequisites are in place enabling them to claim their rights and to lodge objections to existing and perceived instances of discrimination or violations of law.

Part of the process of informing children includes that children are heard when they voice concerns relating to staff of Save the Children Deutschland e. V., staff of partner organisations and external service providers. We ensure this in all projects and programmes in Germany by displaying the Code of Conduct in child-friendly language and providing the children with a channel for reporting issues and making complaints.<sup>13</sup> For longer-term activities it is vital that children have helped to develop the reporting and complaints mechanisms.

The children's families are also included in the way we explain these matters. In conformity with our policy, the guardians' consent has to be obtained for awareness-raising work with their children. Furthermore, we have the guardians participate in the explanation

process, mainly to prevent an imbalance between children and their families in their respective levels of knowledge. We thereby aspire to strengthen the rights of children, directly and indirectly.

In our projects in Germany in which the use of social media by children is a firm component, we ensure that:

- children and their guardians are informed about the use of social media channels and associated risks, e.g. dangers like cyberbullying and online grooming.
- children receive adult support in the use of the social media.
- Internet-ready devices provided by us ensure safe access to the Internet, for example by having parental control software installed and activated.

### 4. Safeguarding standards in human resources policy

Save the Children Deutschland e. V. places the utmost value in a human resources policy that contributes to creating a safe environment for children. Its main purpose is to regularly make staff members aware of our Child Safeguarding Policy and the standards contained therein.

#### 4.1 Recruitment advertisements

In our standardised recruitment advertisements we emphasise the strong relevance of institutional child protection in our everyday work. We inform potential applicants that we require them to be willing to work according to our child safeguarding standards. Moreover, we draw attention to the fact that on taking up employment, an enhanced criminal record check will be required.

#### 4.2 Selection procedure

All persons who are invited to a job interview are made aware of our child safeguarding standards again

<sup>13</sup> Projects and programmes abroad – including their child safeguarding measures – are planned and implemented under the coordination of the Save the Children country offices. The country offices, in turn, are under the direction and responsibility of the umbrella organisation Save the Children International. For detailed information on the division of work within the organisation, see Chapter 1.

at that time. Questions are asked about their general attitude towards institutional child protection as well as on our Child Safeguarding Policy. We differentiate between positions involving indirect and direct contact with children; for the latter, additional references are obtained.

### 4.3 Staff induction

If offered a job, future members of staff must present an enhanced criminal record check at the time of induction. If the criminal record check contains relevant previous convictions which, with due regard to the aims of the Child Safeguarding Policy, bar them from taking up the job in question, the offer of employment will be retracted.

New staff members receive the Child Safeguarding Policy on their first day at work. After they have read it, they must submit a written confirmation that they have understood the Policy, including the Codes of Conduct, and will behave in accordance with them. Furthermore, staff members are informed that Save the Children Deutschland e. V. will report every violation constituting a criminal offence to the police. Violations not constituting a criminal offence may lead to disciplinary proceedings and result in further measures being taken under employment law, up to and including dismissal. For the recording of reported incidents, the organisation has an internal procedure in place for managing cases of suspected abuse.<sup>14</sup>

### 4.4 Staff in service

In the first three months and no later than the completion of the probationary period, all new staff members must have taken part in the introductory course on child protection and safeguarding. Attendance will be reviewed and confirmed by Human Resources Management.

As part of a continuous awareness-raising effort within the staff body on the theme of safeguarding, the Child Protection and Safeguarding Team keeps staff informed about the latest developments at regular intervals – by hosting theme-specific events and through updates in the organisation’s internal newsletter.

Finally, all staff members must supply an up-to-date enhanced criminal record check every two years. The costs of this are reimbursed by Save the Children Deutschland e. V.

## 5. Safeguarding standards in our communication

Reporting about children and their rights is of prime concern for Save the Children and our aim is to support reporters in this work. At the same time, the priority in every interview and article is to protect children from harm. In order to ensure the best possible protection, we expect every person reporting in both traditional and social media in the course of our work to abide by the German Press Code and the applicable local laws and customs. We also ask reporters to adhere to the following information and guidelines:<sup>15</sup>

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<sup>14</sup> See Chapter 8, “Procedure for managing cases of suspected abuse”.

<sup>15</sup> See also Annex 4, “Information and Guidelines for Reporters”.

### **Reporters can expect that:**

- we will explain to them the special measures required to safeguard children in the course of their reporting (e.g. the degree of pseudonymisation necessary).
- we will explain to all children involved and their guardians about the background and approach of the reporting.
- as a general rule, written consent forms will have been completed.
- we will ensure that a professional psychotherapist is present or on call if the interviews are likely to entail an increased risk of emotional stress for children.
- we will make sure that premises or locations used for conversations with children are appropriate for them and conducive to their protection.

### **At all times, we ask reporters:**

- to respect the rights of children, their guardians and other parties involved and treat and portray them at all times with dignity and respect.
- to act responsibly in maintaining safe physical and emotional boundaries and in their role as a reporter.

### **When producing media content, we ask reporters:**

- to respect the privacy of all interviewees and of the people around them.
- to have a member of Save the Children staff accompany them at all times – this is also for the reporters' own protection.
- to adapt interviews, videos and photos to the age and maturity of those taking part.
- to accept respectfully if children, their guardians or other parties involved want to take a break from or abandon the interview, filming or photography.

### **When disseminating media content, we ask reporters:**

- to pseudonymise all persons portrayed, as stipulated by Save the Children, in accordance with the level of potential risk to those particular persons (see Figure 2).
- only to use (including for private dissemination such as via Facebook) material that has been released under the terms of the consent form.
- to portray children in such way as to maintain their dignity and protection.
- not to use pictures themselves in unrelated contexts which might place children at risk due to stigmatisation, for instance. This would happen for example if a photo of a child from an education project in Kenya was used as a symbolic image for the HIV/Aids theme, although the original reporting was unrelated to HIV/Aids.

### **When storing media content, we ask reporters:**

- to maintain the stipulated level of pseudonymisation when tagging content, for example with names and places, and/or to add a note about the necessity for pseudonymisation.

### **If reporters witness an endangerment of the welfare of a child in the course of their reporting for Save the Children, we ask them:**

- to inform their contact at Save the Children confidentially within 24 hours.

## Figure 2: Pseudonymisation for the protection of particularly vulnerable children

In accordance with the Save the Children Global Brand Guidelines,<sup>16</sup> as a general rule only the first names of children and their guardians are to be used for publication. If particularly vulnerable children are the subjects of reports, additional steps in pseudonymisation are to be taken according to three levels of risk.

### Examples of particularly vulnerable children:

- children who were victims of abuse and exploitation
- (former) child soldiers
- children who themselves, or whose parents, suffer from a stigmatising illness
- orphans
- internally displaced persons, (unaccompanied minor) refugees and asylum seekers
- children accused of a crime or who have committed a crime
- children who have experienced emotional stress as a result of natural disasters or conflict
- children who could be exposed to risk through comments in an interview, e.g. by reporting abuse or expressing criticism of another person who could retaliate

### Steps in pseudonymisation of particularly vulnerable children according to level of risk:

*Risk level 1: Low risk of stigmatisation, abuse or exploitation*

- the name must be pseudonymised
- the approximate location may be given
- the face may be shown

*Risk level 2: Medium risk of stigmatisation, abuse or exploitation*

- the name must be pseudonymised
- the approximate location may be given OR
- the face may be shown

*Risk level 3: High risk of stigmatisation, abuse or exploitation*

- the name must be pseudonymised
- the location must not be given AND
- the face must not be shown

The risk is assessed on a number of factors such as the theme of the report, the child's private circumstances, the size of the location, and the type of publication and its likely reach. It follows that the level of risk has to be assessed individually in each case. Save the Children carries out this assessment and uses it as a basis to specify the appropriate degree of pseudonymisation. When in doubt, we must always decide in the best interests of the child.

<sup>16</sup> Save the Children Global Brand Guidelines, May 2016.

## 6. Safeguarding standards in data protection

With regard to protecting the personal data of minors, Save the Children Deutschland e.V. adheres to the policy of not collecting any data about them unless absolutely necessary. In cases in which personal data of minors is collected, this is done in accordance with the data protection legislation in force, e.g. under the German Federal Data Protection Act.

### 6.1 Data on donors and donations

Fundraising appeals by Save the Children Deutschland e.V. are addressed exclusively to persons over the age of majority. Partly for this reason, the date of birth of all donors is routinely collected. If the organisation notices any indication that the age of majority has not been reached, permission is obtained from guardians to debit a donation from an account. Children can still help in many different ways: in this case guardians or other caregivers such as teachers and childcare workers can contact the donor service team and be advised on ways in which such help can be given.

### 6.2 Programmes and projects

In particular cases it can be necessary, e.g. because of administrative rules or for accounting purposes, to collect personal data from children receiving support or care and – with due regard for the data protection regulations in force – to use it for these purposes. Beyond these limits, for the protection of minors their data is pseudonymised as a matter of policy, in various ways depending on the purpose of the data processing.

### 6.3 Storing and using media content

The storage and use of media content showing children in the course of portraying the work of Save the Children Deutschland e.V. always happens on the basis of a declaration of consent by guardians and, age and maturity permitting, by their children. Furthermore, the steps in pseudonymisation for the protection of particularly vulnerable children set out in Chapter 5 also apply here.

## 7. Safeguarding standards in our cooperation with partner organisations

Cooperation with partner organisations is an important component of our work at Save the Children Deutschland e. V. To ensure that children receive the best possible protection throughout the entire work of our organisation, partner organisations must also be made comprehensively aware of institutional child protection, and risks within the cooperation must be minimised. Consequently, we require our local partner organisations to commit to the following safeguarding standards.<sup>17</sup> In the event of violations of these standards, Save the Children Deutschland e. V. reserves the right to terminate the contractual relationship or cooperation immediately.

### 7.1 Institutional donors

Every institutional donor with which Save the Children Deutschland e. V. cooperates will once be sent a copy of the Child Safeguarding Policy for information. In addition, every application that the organisation submits will contain a separate clause referring to our Policy, the standards it contains, and their relevance for our work.

### 7.2 Corporate partners and foundations

Save the Children Deutschland e. V. only cooperates with corporate partners and foundations that declare themselves willing to conform to our Child Safeguarding Policy in the course of the partnership. A corresponding clause is an element of all contracts.

### 7.3 Implementing partners

Cooperation agreements with implementing partners also state, in a separate clause, that they are subject to the provisions of the Policy. In addition, an individual assessment in advance of every agreement establishes which safeguarding standards the partner organisation already uses and whether they are equivalent to those of Save the Children Deutschland e. V. Based on this analysis, the clause further states

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<sup>17</sup> Projects and programmes abroad – including their child safeguarding measures – are planned and implemented under the coordination of the Save the Children country offices. The country offices, in turn, are under the direction and responsibility of the umbrella organisation Save the Children International. For detailed information on the division of work within the organisation, see Chapter 1.

which steps, if any, must be taken within which period of time to ensure that the project or programme meets our standards in the future.

With regard to the procedure for managing cases of suspected abuse, the following applies: if an implementing partner has its own procedure, Save the Children Deutschland e. V. assesses whether this procedure meets our minimum standards. Our minimum standards stipulate that: there must be one person responsible for child protection, there must be a reporting and complaints mechanism (accepted by and accessible for children) in place, and there must be a standardised procedure with clearly defined actors and responsibilities. If there is no in-house procedure in place, decisions are made about the necessary steps in conjunction with the partner organisation.

The partner organisation undertakes to inform us immediately about every case of suspected abuse. If an appropriate in-house procedure is in place when cases of suspected abuse arise, Save the Children Deutschland e. V. offers to provide the partner organisation with expert backup during the investigation process. In all other cases we make sure that the necessary steps are instigated.

#### 7.4 External service providers

External service providers are subject to the provisions of the Child Safeguarding Policy whenever they come into direct contact with children or their personal data through Save the Children Deutschland e. V. or through one of its partner organisations. In this event, they automatically become visitors or reporters, and must undertake to adhere to the relevant Code of Conduct. This undertaking is integral to the terms of the cooperation.

## 8. Procedure for managing cases of suspected abuse

Save the Children Deutschland e. V. has an institutional procedure for managing cases of suspected child abuse and child exploitation. The aim of the procedure is to ensure that cases of suspected abuse that arise are assessed and investigated quickly, thoroughly and with utmost confidentiality for all parties affected. In order to achieve this aim, the actors involved and their responsibilities are defined clearly in advance, and the sequence of actions under the procedure is defined comprehensively and transparently (see Figures 3 and 4). Defined standards apply to the procedure. In cases of suspected abuse that arise in our projects and programmes abroad, we work closely and confidentially with our country offices and the umbrella organisation Save the Children International.

### 8.1 Procedural standards

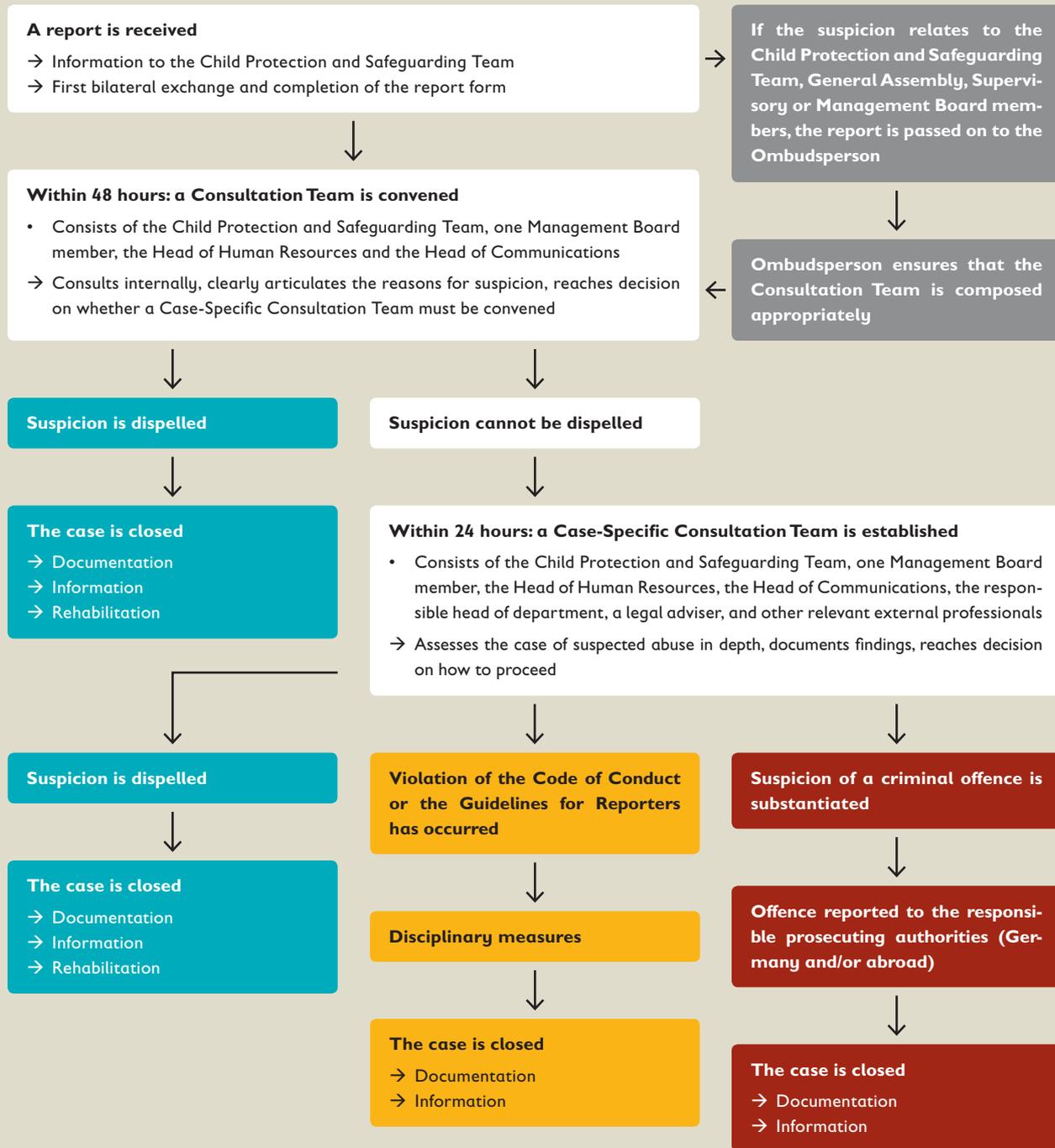
Throughout the procedure for managing a case of suspected abuse, it is ensured that:

- the affected child is protected and receives access to any necessary offers of help.
- guardians are informed by us about the case of suspected abuse and the further process, and supported by us if applicable.
- the individual under suspicion
  - if suspected of abuse or exploitation, is removed or sent on leave from direct work with children.
  - is subject to a fair procedure.
  - is kept appropriately informed about the progress of the investigation.
  - receives access to necessary offers of help.
- the allegation made by the person voicing the suspicion is treated confidentially by all actors involved.
- the case is continuously documented.
- there is continuous exchange with Save the Children International and with the responsible country office if applicable. Care is taken here in each particular case to comply with the data protection regulations in force applying to the data transmitted.

**Figure 3: Procedure for managing cases of suspected abuse, Scenario 1: Internal cases of suspected abuse**

**Person under suspicion:** staff member; member of the Management Board, Supervisory Board or General Assembly; apprentice; temporary or freelance staff member; student assistant; intern; school student; self-employed contractor or volunteer

**Alleged victim:** a child below the age of 18 years being supported directly or indirectly by Save the Children Deutschland e. V.



## 8.2 Actors and their responsibilities

### 8.2.1 The Child Protection and Safeguarding Team

**Definition:** The Child Protection and Safeguarding Team is composed of at least two and a maximum of three persons with significant expertise in the fields of children's rights, child protection and safeguarding. These are the primary contact persons for child protection and safeguarding within Save the Children Deutschland e. V.

**Responsibilities:** Within the framework of the procedure and maintaining confidentiality for all parties, the Team's responsibility is to record, assess (or pass on for assessment), investigate and document all reported cases of suspected abuse. At the same time, it ensures the protection of all parties affected – children, persons under suspicion, persons voicing suspicions, and the people around them.

### 8.2.2 The Consultation Team

**Definition:** The Consultation Team is composed of at least the Child Protection and Safeguarding Team, one Management Board member, the Head of Human Resources and the Head of Communications. For external cases of suspected abuse, the partner organisation's responsible contact person is also called in. The Management Board member decides on a case-dependent basis whether to call in the head of the department from which the partner organisation comes. The Consultation Team is convened when cases of suspected abuse arise.

**Responsibilities:** The Team's principal task is to clearly articulate the reasons for the suspicion and on that basis to decide whether a Case-Specific Consultation Team must be convened. If it emerges in the course of the procedure that a person has been wrongly accused, the complete rehabilitation of that person is also the task of the Consultation Team. It must re-establish the person's reputation and make sure that the person is fit for work. Rehabilitation is to be carried out with the same thoroughness as the investigation of a case of suspected abuse.

### 8.2.3 The Case-Specific Consultation Team

**Definition:** The Case-Specific Consultation Team is composed of the Consultation Team, a legal adviser, and other external professionals relevant to the case of suspected abuse. For internal cases of suspected abuse the responsible head of department is also called in, and for external cases, once again, the partner organisation's responsible contact person. This Team is convened if the reported suspicion is substantiated.

**Responsibilities:** This Team is responsible for investigating the case of suspected abuse in depth. Based on its investigation it decides whether the suspicion is dispelled, whether a violation of the Code of Conduct has been found, or whether the suspicion of a criminal offence is gaining substance. In accordance with the decision made, it initiates further measures.

### 8.2.4 The Ombudsperson

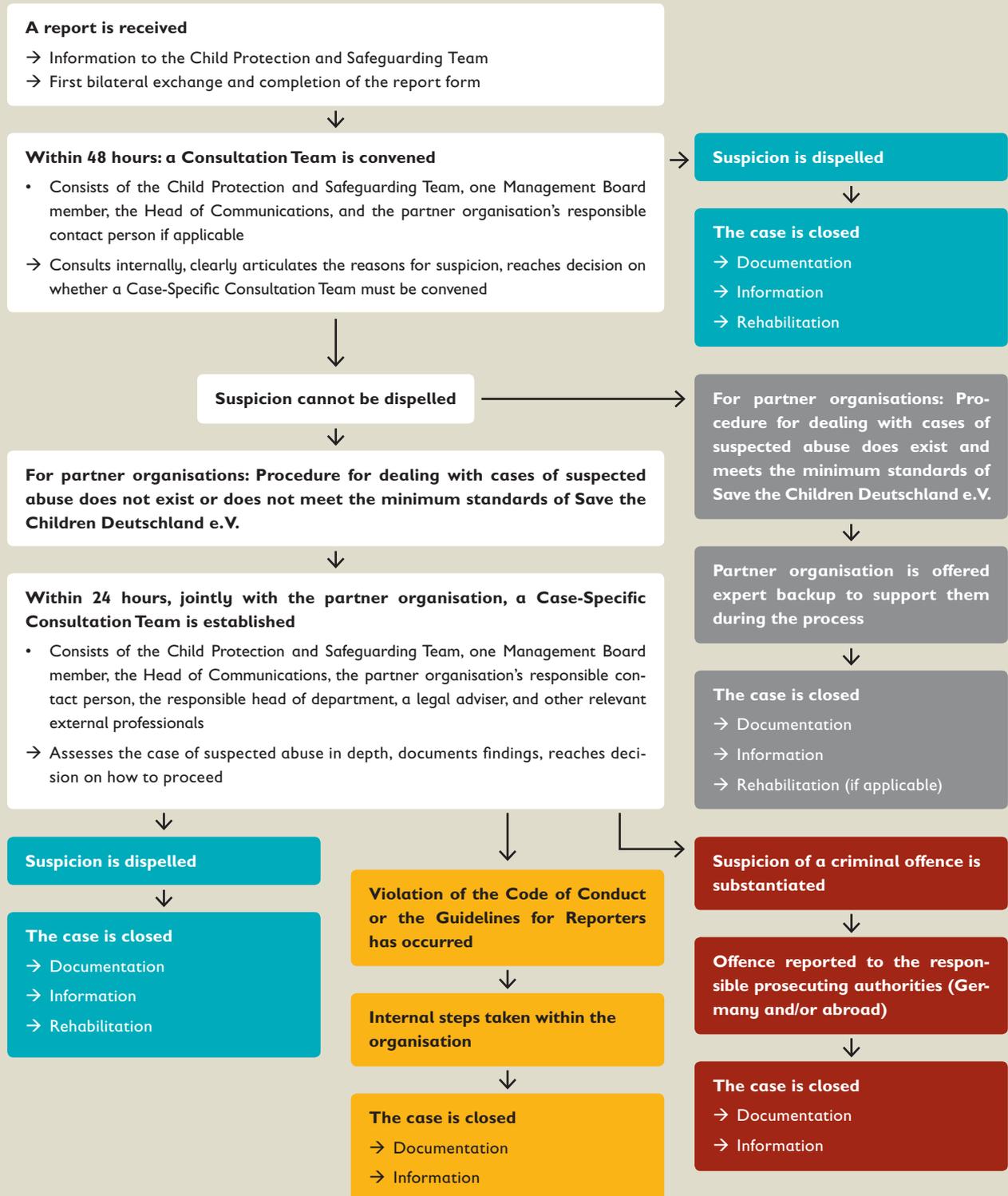
**Definition:** The Ombudsperson is an external, independent, neutral and confidential contact person for suggestions and complaints about all the activities of Save the Children Deutschland e. V.

**Responsibilities:** Cases of suspected abuse can be brought directly to the Ombudsperson, who forwards them to the Child Protection and Safeguarding Team. If a suspicion relates to the Child Protection and Safeguarding Team, Management Board, General Assembly or Supervisory Board members, the Ombudsperson ensures that the (Case-Specific) Consultation Team is composed appropriately.

**Figure 4: Procedure for managing cases of suspected abuse, Scenario 2: External cases of suspected abuse**

**Person under suspicion:** a staff member belonging to one of the partner organisations or a person who came into direct contact with children or their personal data through Save the Children Deutschland e. V. or through a partner organisation

**Alleged victim:** a child below the age of 18 years being supported directly or indirectly by Save the Children Deutschland e. V.



## 9. Monitoring and evaluation

In order to ensure the long-term effectiveness of the Child Safeguarding Policy, we continuously monitor its implementation, evaluate the Policy as a whole, and make any adaptations found to be necessary as a result.

### 9.1 Internal monitoring

The Child Protection and Safeguarding Team meets regularly to review the implementation of the Policy with the help of an internal monitoring system.

### 9.2 External audits

An independent organisation carries out external audits regularly. Save the Children Deutschland e. V. undertakes to implement the recommendations made within this framework.

### 9.3 Evaluation and adaptation

Alongside the continuous monitoring of the implementation of the Child Safeguarding Policy, the document is reviewed and subsequently adapted every three years. These adaptations are based on lessons learned, the results of internal monitoring and the external audit, feedback from staff members, partner organisations, other third parties, children and their families, as well as possible changes in (inter-)national safeguarding practice.

### 9.4 Reporting

The Child Protection and Safeguarding Team and the Management Board report:

- every six months to the Senior Management Team regarding progress made in implementing the Child Safeguarding Policy
- once a year to all staff members, the General Assembly and Save the Children International about the progress made with implementation and the cases (of suspected abuse) reported in the previous year.

The Supervisory Board member responsible for safeguarding delivers regular reports to the Supervisory Board about the progress made in implementing the Child Safeguarding Policy.

## **Annex 1: Code of Conduct for Staff of Save the Children Deutschland e. V.**

### **1. Objective**

Our aim is to ensure that children<sup>1</sup> receive the best possible protection from abuse and exploitation throughout the entire work of our organisation both in Germany and abroad. Save the Children Deutschland e. V. is therefore committed to the following Code of Conduct. It is intended to give us confidence in our actions and support us in establishing a safe environment for children.

### **2. Scope**

The Code of Conduct applies to:

- full-time staff including Senior Management and the Management Board
- members of the General Assembly and the Supervisory Board
- apprentices, temporary and freelance staff, student assistants, interns, school students, self-employed contractors and volunteers.

### **3. Code of Conduct**

1. I respect the rights of children and conform to the relevant legislation that applies at international, European and the respective national level.
2. I undertake to do everything I can to safeguard children from neglect and from physical, emotional and sexual abuse and exploitation.
3. I refrain from using language or behaviour that is violent, discriminatory, racist or sexist either towards children or in the presence of children.
4. I treat children as individuals with their own personalities and show them respect – regardless of, e.g. age, gender, origin, language, religion, skin colour, disability or political views.
5. I respect children's opinions and concerns and give them a say in all matters affecting them, as appropriate for their age and their level of maturity.
6. I make sure that once children can do things of a personal nature unaided, they do these things for themselves – for example, going to the toilet or changing their clothes.
7. I respect the children's guardians and am respectful of their responsibilities.

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<sup>1</sup> Following the United Nations Convention on the Rights of the Child, a child means every human being below the age of 18 years.

8. I ensure that when I have contact with children, a second adult is present or within sight or hearing at all times (“two adults rule”).<sup>2</sup>
9. I undertake to comply with the “Information and Guidelines for Reporters”<sup>3</sup> during the preparation, dissemination and storing of media content.
10. I am careful and transparent about my role when dealing with children and their families, and do not abuse the power disparity that exists between aid organisations and beneficiaries and between adults and children.
11. I act responsibly to maintain safe physical and emotional boundaries and to avoid harmful forms of relationships with children, involving for example sexual abuse and exploitation.
12. I play my part in creating a culture of mutual responsibility in the workplace that enables any cases of suspected abuse arising at Save the Children Deutschland e.V. to be reported and dealt with confidentially for all parties.
13. I report any cases of suspected abuse that come to my attention in the course of my work for Save the Children Deutschland e.V. within 24 hours, confidentially, to the designated contact persons.

#### 4. Declaration of Commitment

I have read and understood the Code of Conduct and undertake to act in accordance with these guidelines.

I am aware that Save the Children Deutschland e.V. will report every violation constituting a criminal offence to the police. Violations not constituting a criminal offence may lead to disciplinary proceedings being initiated and result in further measures being taken under employment law, up to and including dismissal.

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Place, Date

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Name, Signature

<sup>2</sup> If this is not possible, there should be at least five children in the group. Supervising one child on his/her own is only permitted in exceptional situations for a short period of time.

<sup>3</sup> See Annex 4 of the Child Safeguarding Policy.

## Annex 2: Code of Conduct for Staff of Partner Organisations

### 1. Objective

Our aim is to ensure that children<sup>1</sup> receive the best possible protection from abuse and exploitation throughout the entire work of our organisation both in Germany and abroad. Save the Children Deutschland e. V. therefore requires its partner organisations to commit to the following Code of Conduct. It is intended to give us confidence in our actions and support us in establishing a safe environment for children.

### 2. Scope

The Code of Conduct applies to:

- staff of institutional donors, corporate and implementing partners, foundations and of other partner organisations who come into direct contact with children or their personal data through Save the Children Deutschland e.V. or through one of its partner organisations.<sup>2</sup>

### 3. Code of Conduct

1. I respect the rights of children and conform to the relevant legislation that applies at international, European and the respective national level.
2. I undertake to do everything I can to safeguard children from neglect and from physical, emotional and sexual abuse and exploitation.
3. I refrain from using language or behaviour that is violent, discriminatory, racist or sexist either towards children or in the presence of children.
4. I treat children as individuals with their own personalities and show them respect – regardless of, e.g. age, gender, origin, language, religion, skin colour, disability or political views.
5. I respect children's opinions and concerns and give them a say in all matters affecting them, as appropriate for their age and their level of maturity.
6. I make sure that once children can do things of a personal nature unaided, they do these things for themselves – for example, going to the toilet or changing their clothes.
7. I respect the children's guardians and am respectful of their responsibilities.

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1 Following the United Nations Convention on the Rights of the Child, a child means every human being below the age of 18 years.

2 If the implementing partner on the project or programme to be visited has an equivalent Code of Conduct, this may also be signed.

8. I ensure that when I have contact with children, a second adult is present or within sight or hearing at all times (“two adults rule”).<sup>3</sup>
9. I undertake to comply with the “Information and Guidelines for Reporters”<sup>4</sup> during the preparation, dissemination and storing of media content.
10. I am careful and transparent about my role when dealing with children and their families, and do not abuse the power disparity that exists between aid organisations and beneficiaries and between adults and children.
11. I act responsibly to maintain safe physical and emotional boundaries and to avoid harmful forms of relationships with children, involving for example sexual abuse and exploitation.
12. I play my part in creating a culture of mutual responsibility in the workplace that enables any cases of suspected abuse arising at Save the Children Deutschland e.V. to be reported and dealt with confidentially for all parties.
13. I report any cases of suspected abuse that come to my attention in the course of my work for Save the Children Deutschland e. V. within 24 hours, confidentially, to the designated contact persons.

#### 4. Declaration of Commitment

I have read and understood the Code of Conduct and undertake to act in accordance with these guidelines.

I am aware that Save the Children Deutschland e. V. will report every violation constituting a criminal offence to the police. Violations not constituting a criminal offence may lead to measures being taken within the organisation, including termination of the contractual relationship or cooperation.

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Place, Date

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Name, Signature

<sup>3</sup> If this is not possible, there should be at least five children in the group. Supervising one child on his/her own is only permitted in exceptional situations for a short period of time.

<sup>4</sup> See Annex 4 of the Child Safeguarding Policy.

## Annex 3: Code of Conduct for Visitors

### 1. Objective

Our aim is to ensure that children<sup>1</sup> receive the best possible protection from abuse and exploitation throughout the entire work of our organisation both in Germany and abroad. Save the Children Deutschland e.V. therefore requires all visitors to projects, programmes, events and campaigns to commit to the following Code of Conduct. It is intended to give us confidence in our actions and support us in establishing a safe environment for children.

### 2. Scope

The Code of Conduct applies to:

- visitors to projects, programmes, events and campaigns that are promoted or organised by Save the Children Deutschland e.V.<sup>2</sup>

### 3. Code of Conduct

1. I respect the rights of children and conform to the relevant legislation that applies at international, European and the respective national level.
2. I undertake to do everything I can to safeguard children from neglect and from physical, emotional and sexual abuse and exploitation.
3. I refrain from using language or behaviour that is violent, discriminatory, racist or sexist either towards children or in the presence of children.
4. I treat children as individuals with their own personalities and show them respect – regardless of, e.g. age, gender, origin, language, religion, skin colour, disability or political views.
5. I respect children's opinions and concerns and give them a say in all matters affecting them, as appropriate for their age and their level of maturity.
6. I make sure that once children can do things of a personal nature unaided, they do these things for themselves – for example, going to the toilet or changing their clothes.
7. I respect the children's guardians and am respectful of their responsibilities.

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1 Following the United Nations Convention on the Rights of the Child, a child means every human being below the age of 18 years.

2 If the implementing partner on the project or programme to be visited has an equivalent Code of Conduct, this may also be signed.

8. I ensure that when I have contact with children, a second adult is present or within sight or hearing at all times (“two adults rule”).<sup>3</sup>
9. I undertake to comply with the “Information and Guidelines for Reporters”<sup>4</sup> during the preparation, dissemination and storing of media content.
10. I am careful and transparent about my role when dealing with children and their families, and do not abuse the power disparity that exists between aid organisations and beneficiaries and between adults and children.
11. I act responsibly to maintain safe physical and emotional boundaries and to avoid harmful forms of relationships with children, involving for example sexual abuse and exploitation.
12. I play my part in creating a culture of mutual responsibility in the workplace that enables any cases of suspected abuse arising at Save the Children Deutschland e.V. to be reported and dealt with confidentially for all parties.
13. I report any cases of suspected abuse that come to my attention in the course of my work for Save the Children Deutschland e.V. within 24 hours, confidentially, to the designated contact persons.

#### 4. Declaration of Commitment

I have read and understood the Code of Conduct and undertake to act in accordance with these guidelines.

I am aware that Save the Children Deutschland e.V. will report every violation constituting a criminal offence to the police. Violations not constituting a criminal offence may lead to measures being taken within the organisation, including termination of the contractual relationship or collaboration.

-----  
Place, Date

-----  
Name, Signature

<sup>3</sup> If this is not possible, there should be at least five children in the group. Supervising one child on his/her own is only permitted in exceptional situations for a short period of time.

<sup>4</sup> See Annex 4 of the Child Safeguarding Policy.

## Annex 4: Information and Guidelines for Reporters

Reporting about children and their rights is of prime concern to us and our aim is to support you in this work. At the same time, the priority in every interview and article is to protect children from harm. In order to ensure the best possible protection, we expect every person reporting in both traditional and social media in the course of our work to abide by the German Press Code and the applicable local laws and customs. We also ask you to adhere to the following information and guidelines:

### **You can expect that:**

- we will explain to you the special measures required to safeguard children in the course of your reporting (e.g. the degree of pseudonymisation necessary).
- we will explain to all children involved and their guardians about the background and approach of your reporting.
- as a general rule, written consent forms will have been completed.
- we will ensure that a professional psychotherapist is present or on call if the interviews are likely to entail an increased risk of emotional stress for children.
- we will make sure that premises or locations used for conversations with children are appropriate for them and conducive to their protection.

### **At all times, we ask you:**

- to respect the rights of children, their guardians and other parties involved and treat and portray them at all times with dignity and respect.
- to act responsibly in maintaining safe physical and emotional boundaries and in your role as a reporter.

### **When producing media content, we ask you:**

- to respect the privacy of all interviewees and of the people around them.
- to have a member of Save the Children staff accompany you at all times – this is also for your own protection.
- to adapt interviews, videos and photos to the age and maturity of those taking part.
- to accept respectfully if children, their guardians or other parties involved want to take a break from or abandon the interview, filming or photography.

**When disseminating media content, we ask you:**

- to pseudonymise all persons portrayed, as stipulated by Save the Children, in accordance with the level of potential risk to those particular persons (see box below).
- only to use (including for private dissemination such as via Facebook) material that has been released under the terms of the consent form.
- to portray children in such way as to maintain their dignity and protection.
- not to use pictures themselves in unrelated contexts which might place children at risk due to stigmatisation, for instance. This would happen for example if a photo of a child from an education project in Kenya was used as a symbolic image for the HIV/Aids theme, although the original reporting was unrelated to HIV/Aids.

**When storing media content, we ask you:**

- to maintain the stipulated level of pseudonymisation when tagging content, for example with names and places, and/or to add a note about the necessity for pseudonymisation.

**If you witness an endangerment of the welfare of a child in the course of your reporting for Save the Children, we ask you:**

- to inform your contact at Save the Children confidentially within 24 hours.

I have read and understood the Information and Guidelines for Reporters:

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*Place, Date*

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*Name, Signature*

## Box: Pseudonymisation for the protection of particularly vulnerable children

In accordance with the Save the Children Global Brand Guidelines,<sup>1</sup> as a general rule only the first names of children and their guardians are to be used for publication. If particularly vulnerable children are the subjects of reports, additional steps in pseudonymisation are to be taken according to three levels of risk.

### Examples of particularly vulnerable children:

- children who were victims of abuse and exploitation
- (former) child soldiers
- children who themselves, or whose parents, suffer from a stigmatising illness
- orphans
- internally displaced persons, (unaccompanied minor) refugees and asylum seekers
- children accused of a crime or who have committed a crime
- children who have experienced emotional stress as a result of natural disasters or conflict
- children who could be exposed to risk through comments in an interview, e.g. by reporting abuse or expressing criticism of another person who could retaliate

### Steps in pseudonymisation of particularly vulnerable children according to level of risk:

*Risk level 1: Low risk of stigmatisation, abuse or exploitation*

- the name must be pseudonymised
- the approximate location may be given
- the face may be shown

*Risk level 2: Medium risk of stigmatisation, abuse or exploitation*

- the name must be pseudonymised
- the approximate location may be given OR
- the face may be shown

*Risk level 3: High risk of stigmatisation, abuse or exploitation*

- the name must be pseudonymised
- the location must not be given AND
- the face must not be shown

The risk is assessed on a number of factors such as the theme of the report, the child's private circumstances, the size of the location, and the type of publication and its likely reach. It follows that the level of risk has to be assessed individually in each case. Save the Children carries out this assessment and uses it as a basis to specify the appropriate degree of pseudonymisation. When in doubt, we must always decide in the best interests of the child.

<sup>1</sup> Save the Children Global Brand Guidelines, May 2016.

## Sources of inspiration for this Child Safeguarding Policy

- Save the Children International Child Safeguarding Protocol
- Save the Children International Child Safeguarding Policy
- Kinderschutz-Policy [Child Protection Policy] of Kindernothilfe e. V.
- Richtlinien zum Kinderschutz [Guidelines on child protection] of World Vision Deutschland e. V.
- Kinderschutzrichtlinie [Child protection guidelines] of CBM Christoffel-Blindenmission
- VENRO Code of Conduct for Children's Rights
- VENRO Kinderschutz konkret [Concrete child protection]: <http://www.kinderschutz.venro.org/>
- Child protection within Arbeiterwohlfahrt Saarland's social and youth workers' network

## **Imprint**

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[www.savethechildren.de](http://www.savethechildren.de)