

SAVE THE CHILDREN DEUTSCHLAND E. V.

Child Safeguarding Policy

October 2022

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1. Introduction

1.1 Child safeguarding: Definition, objectives and reasons

The protection of children 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 all forms of violence, accidents and other dangers within our own organisation. To accomplish this, we adhere to child safeguarding, i.e. institutional child protection. We make sure that:

- our 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 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 our 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 suspected violations of child safeguarding can be reported and resolved while maintaining confidentiality for all parties.

The basis for ensuring all this 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 suspicions of violations 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 from slander.

The importance of systematic child safeguarding can be seen from official findings from public inquiries into cases of abuse in Germany and other countries. These provide evidence that children who are supported or cared for by institutions are particularly exposed to the risk of

abuse. This also encompasses organisations in the field of development cooperation and humanitarian aid. Poverty, conflicts, natural disasters and diverse power disparities between organisations and the local population foster all kinds of discrimination, violence and exploitation. At the same time, potential abusers repeatedly seek direct access to children through institutions – in Germany and worldwide.

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 Supervisory Board and the General Assembly, apprentices, temporary and freelance staff, student staff members, interns, school students, self-employed contractors and volunteers
- staff of institutional donors, corporate and implementing partners, foundations and other partners who come into direct contact with children or their personal data through Save the Children Deutschland e. V. or 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 whose work for Save the Children Deutschland e. V. involves reporting in the media, including social media.

Save the Children Deutschland e. V. is one of the national Save the Children organisations that are joined together in the global alliance called the Save the Children Association. 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 and programmes in their 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 child safeguarding standards and regularly monitoring and evaluating their implementation. In relation to Germany, Save the Children Deutschland e. V. bears the primary responsibility.

1.3 The child rights-based approach and child safeguarding

The work of Save the Children is child rights-based. That means 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 respect for the child's views and wishes. Finally, we ensure that our work is aimed at strengthening duty-bearers and rights-holders in equal measure.

Our child 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 reinforce children and their families as rights-holders. These include informing children and the people around them 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 all forms of violence 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 Conventions on the Protection of Children against Sexual Exploitation and Sexual Abuse and on Preventing and Combating Violence against Women and Domestic Violence
- laws of the Federal Republic of Germany on the protection of children and young people, particularly the Eighth Book of the Social Code on social assistance to children and young people, and the Federal Child Protection Act
- the relevant legislation of the 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 Rights¹ and the Child Safeguarding Standards of the international network Keeping Children Safe². Last but not least, the Board of Save the Children International passed an updated Child Safeguarding Protocol for the entire organisation in 2019, from which this Policy – adapted to the German context – is derived.

¹ Association of German Development and Humanitarian NGOs (VENRO), VENRO Code of Conduct for Children's Rights: Protecting children against abuse and exploitation in development co-operation and humanitarian aid, 2011.

² Keeping Children Safe, The International Child Safeguarding Standards, www.keepingchildrensafe.global/accountability/, retrieved on 28.06.2022.

Figure 1: Manifestations of violence against children

The definitions below present the main manifestations of violence that pose a potential or actual risk to the health, development or dignity of the child. Often several forms of violence occur at the same time.

Neglect and negligent treatment

Repeated or persistent failure by the responsible caregivers to provide the necessary care to meet a child's basic needs. For example, these encompass needs of a physical nature such as eating, drinking and sleeping, needs for protection, and needs for understanding, appreciation and social bonds.³

Physical violence

The non-accidental, intentional use of violence against children. This covers a multitude of actions such as hitting, kicking, shaking, choking, suffocating, poisoning and burning.⁴

Emotional violence

Attitudes, speech or actions that discriminate against, belittle, reject, isolate, ignore, degrade, threaten, terrorise or adultify the child and thereby impair or harm the child developmentally.⁵

Sexual violence

Sexual acts performed with or in the presence of a child either against the child's will or to which the child, being at a physical, emotional, cognitive or linguistic disadvantage, cannot give informed consent.⁶ Even if a child consents to or initiates sexual acts, that is violence. Perpetrators exploit their position of authority and power to satisfy their own needs at the child's expense.⁷

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, depictions of the sexual exploitation of children, the exploitation of children through 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 or social development.⁸

Digital violence

Any form of physical, emotional and sexual violence against children that takes place via digital media.⁹ Among these are the belittling, harassment, discrimination and coercion of children. Digital violence may be closely linked to violent attacks in the physical world.¹⁰

- 3 Bavarian State Ministry of Family, Labour and Social Affairs, www.aerzteleitfaden.bayern.de/diagnose/vernachlaessigung.php, retrieved on 28.06.2022 (in German).
- 4 Bavarian State Ministry of Family, Labour and Social Affairs, www.aerzteleitfaden.bayern.de/gewalt/formen.php, retrieved on 28.06.2022 (in German).
- 5 Deutscher Kinderschutzbund [German child protection NGO], Stellungnahme zu Gewalt gegen Kinder und Gewaltprävention [Statement on violence against children and the prevention of violence], 2012 (in German); Bavarian State Ministry of Family, Labour and Social Affairs, www.aerzteleitfaden.bayern.de/diagnose/seelische-gewalt.php, retrieved on 28.06.2022 (in German).
- 6 Independent Commissioner for Child Sexual Abuse Issues (UBSKM), https://beauftragte-missbrauch.de/fileadmin/Content/pdf/Zahlen_und_Fakten/Fact_Sheet_Zahlen_und_Fakten_UBSKM.pdf, retrieved on 28.06.2022 (in German).
- 7 Bundeskoordinierung Spezialisierter Fachberatung gegen sexualisierte Gewalt in Kindheit und Jugend [Federal coordination of specialised counselling against sexualised violence in childhood and adolescence], www.bundeskoordinierung.de/de/topic/16.was-ist-sexualisierte-gewalt.html, retrieved on 28.06.2022 (in German). On sexual assaults among children and adolescents, see <https://beauftragte-missbrauch.de/themen/definition/sexuelle-uebergriffe-unter-kindern-und-jugendlichen>, retrieved on 28.06.2022 (in German).
- 8 United Nations Convention on the Rights of the Child, Articles 32, 34 and 36, 1989.
- 9 On the definition of the term "digital media", see Chapter 3, "Digital Child Safeguarding Standards".
- 10 Beratungsstelle gegen sexualisierte Gewalt [Counselling centre against sexual violence], <https://beratung-bonn.de/themen/digitale-gewalt/>, retrieved on 28.06.2022 (in German).

2. Codes of Conduct for contact with children

Our aim is to ensure that children¹¹ receive the best possible protection from all forms of violence, accidents and other dangers 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 Supervisory Board and the General Assembly, apprentices, temporary and freelance staff, student staff members, interns, school students, self-employed contractors and volunteers¹²
- staff of institutional donors, corporate and implementing partners, foundations and other partners who come into direct contact with children or their personal data through Save the Children Deutschland e. V. or one of its partner organisations¹³
- visitors to projects, programmes, events and campaigns that are promoted or organised by Save the Children Deutschland e. V.¹⁴
- reporters whose work for Save the Children Deutschland e. V. involves reporting in the media, including social media.¹⁵

All the groups of people listed are informed about the applicable child 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 their contact with children is expected to be, a case-by-case assessment will be made of whether, in addition, they must supply an up-to-date enhanced criminal record check or sign a "Self-declaration regarding the enhanced criminal record check".¹⁶ 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 good time.

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 legislation in force to protect them.
2. I undertake to do everything I can to safeguard children from neglect and from physical, emotional and sexual violence 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 act responsibly to maintain safe physical and emotional boundaries and avoid harmful forms of relationships with children.

¹¹ In accordance with the United Nations Convention on the Rights of the Child, a child is any person who has not reached 18 years of age.

¹² See Annex 1, "Code of Conduct for Staff of Save the Children Deutschland e. V."

¹³ See Annex 2, "Code of Conduct for Staff of Partner Organisations".

¹⁴ See Annex 3, "Code of Conduct for Visitors".

¹⁵ See Annex 4, "Information and Guidelines for Reporters".

¹⁶ Exceptions to this are staff of Save the Children Deutschland e. V., who must supply an up-to-date enhanced criminal record check for inspection at the time of induction and then every two years. See Chapter 5, "Child safeguarding standards in our human resources policy".

5. I treat children as individuals with their own personalities and show them respect – regardless of age, gender identity, sexual orientation, background or racial ascription, language, religion, social background, disability or political views.
6. I respect children’s opinions and give them a say in all matters affecting them, as appropriate for their age and their level of maturity.
7. 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.
8. I respect the children’s legal caregivers and am respectful of their responsibilities.
9. 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”).¹⁷
10. I undertake to comply with the “Information and Guidelines for Reporters” during the preparation, dissemination and storing of media content.¹⁸
11. I undertake to comply with the “Digital Child Safeguarding Dos and Don’ts” when carrying out activities or projects involving digital media.¹⁹
12. I am careful and transparent about my role when dealing with children and their families. I do not abuse the diverse power disparities that exist between organisations and the local population, as well as between adults and children.
13. I do not share my private contact details (e.g. phone number and email address) with people we reach through our work.
14. I play my part in a culture of mutual responsibility in the workplace that enables all suspicions of violations that arise at Save the Children Deutschland e. V. to be reported and dealt with confidentially for all parties.
15. I report all suspected violations of child safeguarding that come to my attention in the course of my work for Save the Children Deutschland e. V. to the designated contact persons, confidentially, within 24 hours.

The Code of Conduct also states that Save the Children Deutschland e. V. will report every violation constituting a criminal offence to the relevant police force, irrespective of whether our own staff or third parties are involved. Violations not constituting a criminal offence may lead to 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.

¹⁷ If this is not possible, there should be at least five children in the group. Supervising one child on its own is only permitted in exceptional situations for a short period of time.

¹⁸ See Annex 4, “Information and Guidelines for Reporters”.

¹⁹ See Annex 5, “Digital Child Safeguarding Dos and Don’ts”.

3. Digital child safeguarding standards

Save the Children Deutschland e. V. increasingly implements activities and projects making use of digital media.²⁰ This may provide children with opportunities. For example, digital media enable access to information, resources and communication platforms that would otherwise be inaccessible. In this way, they contribute to the realisation of children's rights to protection, promotion and participation. At the same time, digital media harbour various risks that may lead to digital violence against children.

Examples of digital violence against children are:

- Cyber-bullying: individuals or groups insult, humiliate or threaten a child, e.g. on social networks or via messenger services, sometimes in front of a large audience and with the aim of exposing or ostracising the child.
- Cyber-grooming: using digital media and often under a false identity, a person builds up a trusting relationship with a child in the aim of subjecting the child to sexual violence or sexual exploitation – in the digital or in the physical world.
- Sextortion: a person obtains nude photos or videos of a child, e.g. on social networks or via messenger services, and then threatens to publish the shots or footage in an attempt to extort money or further material.

Violence against children by means of digital media has increased sharply in recent years and continues to grow rapidly.²¹ This form of violence is also increasingly common within peer age groups. Moreover, it can be closely linked to violent assaults in the physical world.²² These trends require organisations like Save the Children Deutschland e. V. to adopt new measures to protect children.

By applying digital child safeguarding standards, we seek to ensure that all activities²³ and projects we offer involving digital media are safe for children. Staff members of Save the Children Deutschland e. V. and partner organisations who use digital media must ensure that they minimise online risks for children as far as possible. For this purpose, we have developed Digital Child Safeguarding Dos and Don'ts. These are to be understood as a supplement to the Codes of Conduct and the Information and Guidelines for Reporters.²⁴ All persons who come into direct digital contact with children or their personal data are informed about our current "dos and don'ts".

The wording of the Digital Child Safeguarding Dos:

- I only use my work account to communicate with children and not any private accounts (e.g. phone, email or Facebook).
- I always practise the two adults rule even in digital spaces. That means I am always supported by an additional adult when I communicate with children online. This applies in the same way to video calls and to the moderation of group chats on communication platforms such as Facebook.
- I ensure that as part of activities and projects with a digital component, children receive an introduction to the safe use of digital media tailored to their needs as a target group, and that they are adequately supervised in the further course of the activity or project.
- I take care that Internet-ready devices provided by us or a partner organisation ensure safe access to the Internet, for example by having parental control software installed and activated.

²⁰ There are different ways of defining the term "digital media". We understand it to mean Internet-enabled devices (e.g. laptops, tablets and smartphones), our own website (www.savethechildren.de), social networks (e.g. Facebook, Instagram, Twitter, TikTok and Pinterest), messenger services (e.g. WhatsApp and Signal) and (live) streaming services (e.g. YouTube and Twitch).

²¹ Innocence in Danger, www.innocenceindanger.de/harte-fakten/, retrieved on 28.06.2022 (in German).

²² Bavarian State Ministry of Family, Labour and Social Affairs, <https://bayern-gegen-gewalt.de/gewalt-infos-und-einblicke/formen-von-gewalt/digitale-gewalt/>, retrieved on 28.06.2022 (in German).

²³ Examples of these include social media campaigns, online surveys and virtual meetings with children as well as interviews conducted with or by children.

²⁴ See Annexes 1 to 4.

- I make sure that during video chats with children, the background is neutral and appropriate (e.g. not in the bedroom, no recognisable faces in photos, no valuables or status symbols).
- I refrain from being alone with children online.
- I never present myself anonymously when I communicate with children online, but always using my real name and, if possible, my job title.

The wording of the Digital Child Safeguarding Don'ts:

- I do not share any personal data of children and their legal caregivers (e.g. name, date of birth, address, phone number, name of school) online or offline unless written consent has been obtained from the legal caregivers and their children.
- I do not share my private contact details (e.g. phone number and email address) with people we reach through our work. If a child or an adult asks me for my private contact details or sends a contact request, via Facebook for example, I politely decline and refer to our Codes of Conduct for the protection of children and adults.
- I refrain from any form of digital violence against children. This includes making sure that any information shared with children online does not, for example, discriminate against them, hurt them, frighten them or endanger them.

4. Standards for informing children and their legal caregivers about child safeguarding

To ensure that in the course of our work with children in Germany we give them the best possible protection, 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 take action against instances of discrimination or violations of law.

Another part of informing children about child safeguarding is to make sure that children are heard when they voice concerns relating to staff of Save the Children Deutschland e. V., partner organisations and external service providers. We ensure this in all projects and programmes in Germany by handing out or displaying our Code of Conduct for contact with children in child-friendly form and – if necessary

– in multiple languages, and by providing the children with at least one channel for reporting issues and making complaints. This also applies to digital activities with children. On longer-term projects and programmes, it is vital that children have played a part in developing relevant reporting and complaints mechanisms.

The children's families are also included, where relevant, in the way we explain these matters. First of all, it is essential to obtain the legal caregivers' consent for their children's participation in the activities planned. Furthermore, in the future we wish to involve legal caregivers more in the subsequent process 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, and to protect them.

5. Child safeguarding standards in our human resources policy

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

5.1 Recruitment advertisements

From the start, 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.

5.2 Selection procedure

All persons who are invited to a job interview receive a link to the Child Safeguarding Policy along with the letter of invitation. Appropriate reference to the Policy is made during the job interview, differentiating between positions involving indirect and direct contact with children.

5.3 Staff induction

If offered a job, future members of staff must supply an up-to-date enhanced criminal record check for inspection 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, no induction will take place.

New staff members receive the Child Safeguarding Policy with their contractual documentation. They give a written confirmation that they have understood the Policy including the Code of Conduct and will behave in accordance with it. The Code of Conduct includes the statement that Save the Children Deutschland e. V. will report every violation constituting a criminal offence to the police. Violations not constituting a criminal offence will be met with necessary, appropriate and proportionate consequences. For the recording of reported incidents, the organisation has an internal procedure for managing suspected violations of child safeguarding.²⁵

5.4 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 training session on child safeguarding. Attendance will be reviewed and followed up by Human Resources Management.

As part of a continuous awareness-raising effort on the issue within the staff body, the Child Safeguarding Team keeps staff informed about current developments at regular intervals – for example, about new tools and publications or about the cases of (suspected) child safeguarding violations reported nationally and internationally in the previous year.

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

²⁵ See Chapter 9, “Procedure for managing suspected grave violations of child safeguarding”.

6. Child 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. To ensure the best possible protection, we expect every person reporting in the media, including 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 guidelines²⁶:

Reporters can expect that:

- we will explain our child safeguarding standards to them beforehand and inform them about the special measures required to safeguard children in the course of their reporting.
- we will give all children involved and their legal caregivers an adequate explanation of the background and approach of the reporting.
- the necessary written consent forms covering children and their legal caregivers will have been completed.
- we will ensure that an appropriate professional or trusted adult (e.g. psychotherapist, trauma counsellor or social worker) 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 expect reporters:

- to respect the rights of children, their legal caregivers and other parties involved, and to always treat and portray them 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 expect 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 legal caregivers or other parties involved want to take a break from or abandon the interview, filming or photography.

When disseminating media content, we expect reporters:

- to pseudonymise all persons portrayed, as stipulated by Save the Children, in accordance with the level of potential risk to those persons.²⁷
- only to use material that has been released under the terms of the consent form.

²⁶ See also Annex 4: "Information and Guidelines for Reporters".

²⁷ See Figure 2.

- not to use previously released material if a consent form is withdrawn.
- to portray children in such way as to maintain their dignity and protection.
- not to use pictures in unrelated contexts which might place children at risk, for instance due to stigmatisation. This would happen, for example, if the photo of a child from an education project in Kenya is used as a symbolic image for the HIV/Aids theme although the original reporting was unrelated to HIV/Aids.

When storing media content, we expect 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 any endangerment of the welfare of a child in the course of their reporting for Save the Children, we expect them:

- to inform their designated contact person 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 Image Guidelines,²⁸ as a general rule only the first names of children and their legal caregivers are to be used for publication. At a child's express wish and with the written consent of the child's legal caregivers, it is possible to use the child's real name. If reporting about particularly vulnerable children, their real names are never used. Instead, additional pseudonymisation measures are undertaken according to three risk levels.

Examples of particularly vulnerable children:

- children who are survivors of violence and exploitation
- children who were recruited by armed groups
- children who themselves, or whose parents, suffer from a stigmatising illness
- children whose parents have died
- internally displaced, accompanied and unaccompanied child refugees
- 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, violence 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, violence or exploitation

- the name must be pseudonymised
- the approximate location may be given
- the face must not be shown

Risk level 3: High risk of stigmatisation, violence or exploitation

- the name must be pseudonymised
- the location must not be given
- 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, the type of publication and its likely reach. It follows that the level of risk must 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.

²⁸ Save the Children Global Image Guidelines, February 2018.

7. Child 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 European General Data Protection Regulation.²⁹

7.1 Programmes, projects and activities

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, as a matter of policy their data is pseudonymised in various ways depending on the purpose of the data processing.

7.2 Storing and using media content

The storage and use of media content showing children while portraying the work of Save the Children Deutschland e. V. always takes place on the basis of a written declaration of consent by legal caregivers and, age and maturity permitting, by their children. The procedures for informing children and caregivers set out in Chapter 4 and the pseudonymisation requirements for the protection of particularly vulnerable children set out in Chapter 6 also apply here.

7.3 Donors and data on 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 a legal caregiver to debit a donation from an account. Children can still make a contribution in many different ways: in this case legal caregivers or other accompanying adults such as teachers and childcare workers can contact the donor service team and be advised on ways in which such support can be given.

²⁹ Detailed information on data processing by Save the Children Deutschland e. V. can be consulted at www.savethechildren.de/datenschutz (in German).

8. Child safeguarding standards in our cooperation with partners

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, our partner organisations must also be made comprehensively aware of institutional child protection, and risks within the cooperation must be minimised.

Should staff of a partner organisation come into direct contact with children or their personal data – e.g. in the course of a project visit – they must undertake the following measures, regardless of the type of partnership concerned: signing the appropriate Code of Conduct³⁰, supplying an enhanced criminal records check for inspection or signing a so-called “Self-declaration regarding the enhanced criminal record check”, and attending a Child Safeguarding Briefing.

In addition, and depending on the type of partnership, we require our partner organisations to adhere to the child safeguarding standards below. 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.

8.1 Institutional donors

Every institutional donor with which Save the Children Deutschland e. V. cooperates will be sent a copy of the Child Safeguarding Policy once a year for information. In addition, every application submitted by the organisation will make reference to our Policy, the standards it contains and their relevance for our work, in a separate clause as far as possible.

8.2 Corporate partners and foundations

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

³⁰ See Annexes 1 to 5.

³¹ See Chapter 9 for the definition of “suspected grave violations”.

8.3 Implementing partners

The agreements with implementing partners state, in a separate clause, that they are subject to the provisions of the Policy. In addition, we examine individually which child safeguarding standards a partner organisation already operates and whether they are equivalent to those of Save the Children Deutschland e. V. Based on this analysis, we stipulate which steps, if any, the partner organisation must take within which period of time to ensure that the project or programme meets our standards.

With regard to the procedure for dealing with suspected violations of child safeguarding, the following applies: if an implementing partner has its own procedure, Save the Children Deutschland e. V. examines whether this procedure meets our minimum standards. If there is no in-house procedure or if the minimum standards are not met, decisions are made in a process of dialogue with the partner organisation about the necessary steps to be taken.

The partner organisation undertakes to inform us about every suspected violation of child safeguarding. Suspected grave violations³¹ must be reported to Save the Children Deutschland e. V. within 24 hours of the incident first becoming known. If an appropriate in-house procedure is in place when suspicions of violations arise, Save the Children Deutschland e. V. offers to provide the partner organisation with expert backup during the process of resolving such cases. In all other cases we make sure that the necessary steps are instigated. Furthermore, Save the Children Deutschland e. V. will be informed in every case about the conclusion of the procedure, the findings, and the instigation of necessary, appropriate and proportionate measures.

8.4 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. When this is the case, the measures mentioned at the beginning of this chapter also apply to them. Where external service providers are contracted by a partner organisation, it is the duty of partner organisations to ensure that the measures are adhered to.

9. Procedure for managing suspected grave violations of child safeguarding

Save the Children Deutschland e. V. has an institutional procedure for managing suspected grave violations of child safeguarding involving violence against children and accidents to children. Our procedure differentiates between internal and external suspected violations. For internal suspected violations, the person under suspicion is a Save the Children Deutschland e. V. staff member. For external suspected violations, the person under suspicion is a staff member of a partner organisation or a person who, through Save the Children Deutschland e. V. or one of its partner organisations, has come into direct contact with children or their personal data.

The procedure set out here concentrates on suspected grave violations. A suspected grave violation is a case where a child has suffered or could have suffered severe harm. Included in this category are accidents resulting in serious injury or death as well as the perpetration of different forms of violence against a child, such as emotional, physical or sexual violence and exploitation.

The aim of the procedure is to ensure that suspicions of violations that arise are examined and resolved quickly, thoroughly and with utmost confidentiality for all parties affected. To achieve this aim, the parties involved in the procedure as well as their responsibilities are clearly defined in advance, and the sequence of actions under the procedure is comprehensible and transparent.³² Defined standards are in place for the procedure.

9.1 Procedural standards

Throughout the procedure for dealing with a suspected violation of child safeguarding, it is ensured that:

- a risk analysis is carried out at the beginning and periodically to give all parties involved the best possible protection.
- the affected child is protected and receives access to any necessary offers of help.

- Legal caregivers are informed about the suspected violation and the further process, and are supported if need be, provided that this procedure does not endanger the child.
- the person under suspicion
 - if suspected of perpetrating violence 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 persons involved.
- the suspected violation is continuously documented.

9.2 Participants involved and their responsibilities

9.2.1 The Child Safeguarding Team

Definition: The Child Safeguarding Team is composed of at least two and a maximum of three persons with long-time expertise in the fields of children's rights and (institutional) child protection. These are the primary contact persons for child 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 the recording, examination, onward referral if necessary, resolution and documentation of all reported suspected violations of child safeguarding. At the same time, it ensures the protection of all parties affected – children, persons under suspicion, persons voicing suspicions, and the people around them.

³² See Figures 3 and 4.

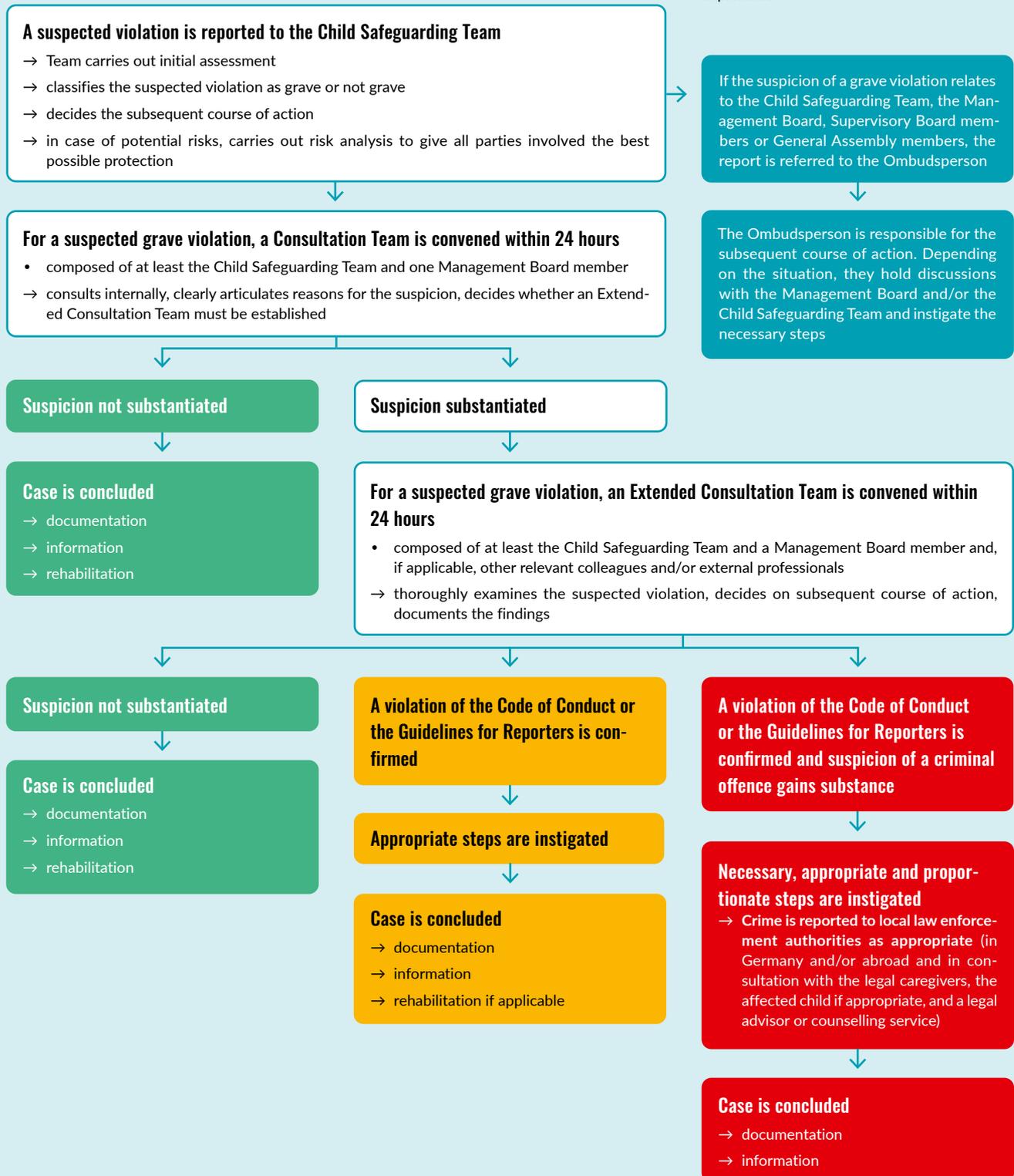
Figure 3: Procedure for managing suspected grave violations of child safeguarding

Scenario 1: Internal suspected violations

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

Child allegedly affected: child under 18 years old who is directly or indirectly supported or cared for by Save the Children Deutschland e.V. or has been in contact with the organisation

Suspected grave violation: a case where a child has suffered or could have suffered severe harm; includes accidents resulting in serious injury or death as well as the perpetration of different forms of violence against a child, such as emotional, physical or sexual violence and exploitation



Throughout the procedure, all parties involved are adequately protected and kept informed.

9.2.2 The Consultation Team

Definition: The Consultation Team is composed of at least the Child Safeguarding Team and one Management Board member. For external suspected violations, the partner organisation's responsible contact person is also called in. The Consultation Team is convened when suspicions of grave violations of child safeguarding are raised.

Responsibilities: The team's principal task is to clearly articulate reasons for the suspicion and on that basis to decide whether an Extended Consultation Team must be convened. If it emerges in the course of the procedure that a person has been wrongly accused, it is also the task of the Consultation Team to rehabilitate the person fully. It must restore their reputation and make sure that they are fit for work. Rehabilitation is to be carried out with the same thoroughness that is applied to resolving a suspected violation.

9.2.3 The Extended Consultation Team

Definition: The Extended Consultation Team is composed of the Consultation Team, a Management Board member and, if appropriate, other relevant colleagues and/or external professionals. For external suspected violations, again the partner organisation's responsible contact person is called in. The Extended Consultation Team is convened when the previously raised suspicion of a grave violation is substantiated.

Responsibilities: This team is responsible for examining the suspected violation in depth. Based on its examination it decides whether the suspicion is not substantiated, whether a violation of the Code of Conduct or the Guidelines for Reporters has occurred, or whether the suspicion of a criminal offence is gaining substance. In accordance with the decision made, the team initiates further measures.

9.2.4 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: Suspected violations of child safeguarding can be brought directly to the Ombudsperson, who is then responsible for the subsequent course of action. Depending on the situation, they hold discussions with the Management Board and/or the Child Safeguarding Team. If a suspicion relates to the Child Safeguarding Team, Management Board, Supervisory Board members or General Assembly members, the Ombudsperson ensures that the (Extended) Consultation Team is composed appropriately.

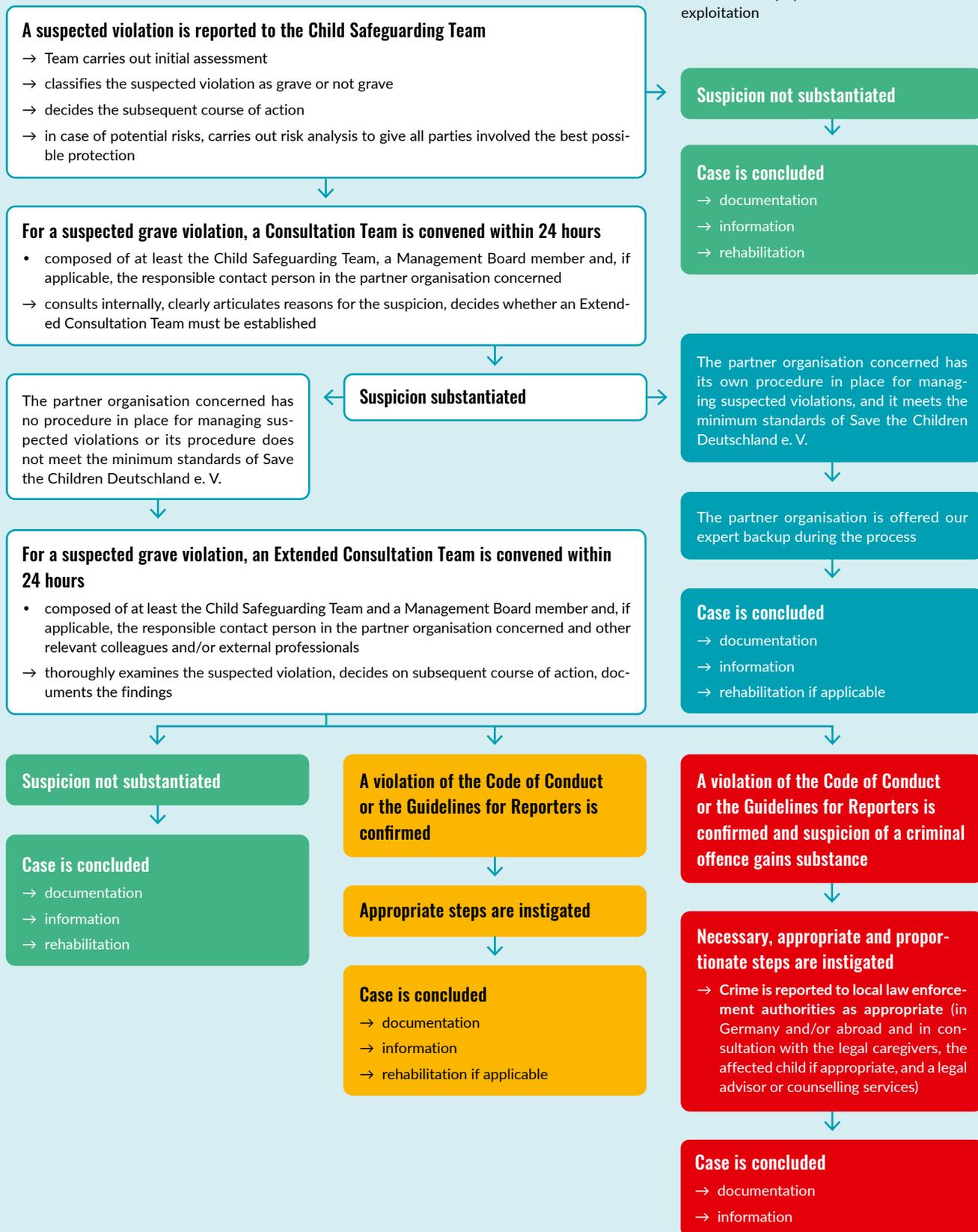
Figure 4: Procedure for managing suspected grave violations of child safeguarding

Scenario 2: External suspected violations

Person under suspicion: staff member of a partner organisation or a person who, through Save the Children Deutschland e. V. or one of its partner organisations, has come into direct contact with children or their personal data

Child allegedly affected: child under 18 years old who is directly or indirectly supported or cared for by Save the Children Deutschland e. V. or has been in contact with the organisation

Suspected grave violation: a case where a child has suffered or could have suffered severe harm; includes accidents resulting in serious injury or death as well as the perpetration of different forms of violence against a child, such as emotional, physical or sexual violence and exploitation



Throughout the procedure, all parties involved are adequately protected and kept informed.

10. Monitoring and evaluation

To ensure the long-term effectiveness of the Child Safeguarding Policy, we monitor its implementation and continuously make any resulting adaptations that are found to be necessary.

10.1 Internal monitoring

The Child Safeguarding Team meets monthly to discuss the implementation status of the Policy. It makes use of an Activity Plan to plan relevant measures annually and to review progress with implementation regularly.

In addition, every six months there is a meeting of the Child Safeguarding Working Group, which is composed of staff members from all departments. It records what successes departments are achieving in implementing the Child Safeguarding Policy and what challenges they face. Appropriate solutions are developed in collaboration with the Child Safeguarding Team.

10.2 Evaluation and adaptation

Alongside the continuous monitoring of the implementation of the Child Safeguarding Policy, the document is reviewed and updated every five years. These updates are based on lessons learned, the results of internal monitoring, feedback from staff members, partner organisations, third parties, children and their families, as well as possible changes in (inter)national child safeguarding practice.

10.3 Reporting

The Child Safeguarding Team reports:

- annually to the Management Board, the Senior Management Team, the General Assembly and to all staff members concerning the implementation status of the Child Safeguarding Policy as well as the cases of (suspected) child safeguarding violations reported internationally and nationally in the previous year.
- quarterly to SCI on the cases of (suspected) child safeguarding violations reported in the previous quarter, and on the percentage of new staff members who have attended the obligatory introductory training session.

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

1. Objective

Our aim is to ensure that children¹ receive the best possible protection from all forms of violence, accidents and other dangers 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 members of the Management Board
- members of the Supervisory Board and the General Assembly
- apprentices, temporary and freelance staff, student staff members, interns, school students, self-employed contractors and volunteers.

3. Code of Conduct

1. I respect the rights of children and conform to the legislation in force to protect them.
2. I undertake to do everything I can to safeguard children from neglect and from physical, emotional and sexual violence 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 act responsibly to maintain safe physical and emotional boundaries and avoid harmful forms of relationships with children.
5. I treat children as individuals with their own personalities and show them respect – regardless of age, gender identity, sexual orientation, background or racial ascription, language, religion, social background, disability or political views.
6. I respect children's opinions and give them a say in all matters affecting them, as appropriate for their age and their level of maturity.
7. 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.

¹ In accordance with the United Nations Convention on the Rights of the Child, a child is any person who has not reached 18 years of age.

8. I respect the children's legal caregivers and am respectful of their responsibilities.
9. 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").²
10. I undertake to comply with the "Information and Guidelines for Reporters" during the preparation, dissemination and storing of media content.³
11. I undertake to comply with the "Digital Child Safeguarding Dos and Don'ts" when carrying out activities or projects involving digital media.⁴
12. I am careful and transparent about my role when dealing with children and their families. I do not abuse the diverse power disparities that exist between organisations and the local population, as well as between adults and children.
13. I do not share my private contact details (e.g. phone number and email address) with people we reach through our work.
14. I play my part in a culture of mutual responsibility in the workplace that enables all suspicions of violations that arise at Save the Children Deutschland e. V. to be reported and dealt with confidentially for all parties.
15. I report all suspected violations of child safeguarding that come to my attention in the course of my work for Save the Children Deutschland e. V. to the designated contact persons, confidentially, within 24 hours.

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 other measures being initiated within the organisation and may result in further steps being taken under employment law, up to and including dismissal.

Place, date

Name, signature

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

³ See Annex 4 of the Child Safeguarding Policy.

⁴ See Annex 5 of the Child Safeguarding Policy.

Annex 2: Code of Conduct for Staff of Partner Organisations

1. Objective

Our aim is to ensure that children¹ receive the best possible protection from all forms of violence, accidents and other dangers 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 other partners who come into direct contact with children or their personal data through Save the Children Deutschland e. V. or one of its partner organisations.²

3. Code of Conduct

1. I respect the rights of children and conform to the legislation in force to protect them.
2. I undertake to do everything I can to safeguard children from neglect and from physical, emotional and sexual violence 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 act responsibly to maintain safe physical and emotional boundaries and avoid harmful forms of relationships with children.
5. I treat children as individuals with their own personalities and show them respect – regardless of age, gender identity, sexual orientation, background or racial ascription, language, religion, social background, disability or political views.
6. I respect children's opinions and give them a say in all matters affecting them, as appropriate for their age and their level of maturity.
7. 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.

¹ In accordance with the United Nations Convention on the Rights of the Child, a child is any person who has not reached 18 years of age.

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 respect the children's legal caregivers and am respectful of their responsibilities.
9. 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").³
10. I undertake to comply with the "Information and Guidelines for Reporters" during the preparation, dissemination and storing of media content.⁴
11. I undertake to comply with the "Digital Child Safeguarding Dos and Don'ts" when carrying out activities or projects involving digital media.⁵
12. I am careful and transparent about my role when dealing with children and their families. I do not abuse the diverse power disparities that exist between organisations and the local population, as well as between adults and children.
13. I do not share my private contact details (e.g. phone number and email address) with people we reach through our work.
14. I play my part in a culture of mutual responsibility in the workplace that enables all suspicions of violations that arise at Save the Children Deutschland e. V. to be reported and dealt with confidentially for all parties.
15. I report all suspected violations of child safeguarding that come to my attention in the course of my work for Save the Children Deutschland e. V. to the designated contact persons, confidentially, within 24 hours.

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.

Place, date

Name, signature

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

⁴ See Annex 4 of the Child Safeguarding Policy.

⁵ See Annex 5 of the Child Safeguarding Policy.

Annex 3: Code of Conduct for Visitors

1. Objective

Our aim is to ensure that children¹ receive the best possible protection from all forms of violence, accidents and other dangers 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.²

3. Code of Conduct

1. I respect the rights of children and conform to the legislation in force to protect them.
2. I undertake to do everything I can to safeguard children from neglect and from physical, emotional and sexual violence 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 act responsibly to maintain safe physical and emotional boundaries and avoid harmful forms of relationships with children.
5. I treat children as individuals with their own personalities and show them respect – regardless of age, gender identity, sexual orientation, background or racial ascription, language, religion, social background, disability or political views.
6. I respect children's opinions and give them a say in all matters affecting them, as appropriate for their age and their level of maturity.
7. 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.

¹ In accordance with the United Nations Convention on the Rights of the Child, a child is any person who has not reached 18 years of age.

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 respect the children's legal caregivers and am respectful of their responsibilities.
9. 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").³
10. I undertake to comply with the "Information and Guidelines for Reporters" during the preparation, dissemination and storing of media content.⁴
11. I undertake to comply with the "Digital Child Safeguarding Dos and Don'ts" when carrying out activities or projects involving digital media.⁵
12. I am careful and transparent about my role when dealing with children and their families. I do not abuse the diverse power disparities that exist between organisations and the local population, as well as between adults and children.
13. I do not share my private contact details (e.g. phone number and email address) with people we reach through our work.
14. I play my part in a culture of mutual responsibility in the workplace that enables all suspicions of violations that arise at Save the Children Deutschland e. V. to be reported and dealt with confidentially for all parties.
15. I report all suspected violations of child safeguarding that come to my attention in the course of my work for Save the Children Deutschland e. V. to the designated contact persons, confidentially, within 24 hours.

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.

Place, date

Name, signature

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

⁴ See Annex 4 of the Child Safeguarding Policy.

⁵ See Annex 5 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. To ensure the best possible protection, we expect every person reporting in the media, including 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 our child safeguarding standards to you beforehand and inform you about the special measures required to safeguard children in the course of your reporting.
- we will give all children involved and their legal caregivers an adequate explanation of the background and approach of the reporting.
- the necessary written consent forms covering children and their legal caregivers will have been completed.
- we will ensure that an appropriate professional or trusted adult (e.g. psychotherapist, trauma counsellor or social worker) 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 expect you:

- to respect the rights of children, their legal caregivers and other parties involved, and to always treat and portray them 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 expect 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 legal caregivers or other parties involved want to take a break from or abandon the interview, filming or photography.

When disseminating media content, we expect you:

- to pseudonymise all persons portrayed, as stipulated by Save the Children, in accordance with the level of potential risk to those persons.¹
- only to use material that has been released under the terms of the consent form.
- not to use previously released material if a consent form is withdrawn.
- to portray children in such way as to maintain their dignity and protection.
- not to use pictures in unrelated contexts which might place children at risk, for instance due to stigmatisation. This would happen, for example, if the photo of a child from an education project in Kenya is used as a symbolic image for the HIV/Aids theme although the original reporting was unrelated to HIV/Aids.

When storing media content, we expect 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 any endangerment of the welfare of a child in the course of your reporting for Save the Children, we expect you:

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

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

Place, date

Name, signature

¹ See Figure.

Figure: Pseudonymisation for the protection of particularly vulnerable children

In accordance with the Save the Children Global Image Guidelines,² as a general rule only the first names of children and their legal caregivers are to be used for publication. At a child's express wish and with the written consent of the child's legal caregivers, it is possible to use the child's real name. If reporting about particularly vulnerable children, their real names are never used. Instead, additional pseudonymisation measures are undertaken according to three risk levels.

Examples of particularly vulnerable children:

- children who are survivors of violence and exploitation
- children who were recruited by armed groups
- children who themselves, or whose parents, suffer from a stigmatising illness
- children whose parents have died
- internally displaced, accompanied and unaccompanied child refugees
- 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, violence 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, violence or exploitation

- the name must be pseudonymised
- the approximate location may be given
- the face must not be shown

Risk level 3: High risk of stigmatisation, violence or exploitation

- the name must be pseudonymised
- the location must not be given
- 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, the type of publication and its likely reach. It follows that the level of risk must 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.

² Save the Children Global Image Guidelines, February 2018.

Annex 5: Digital Child Safeguarding Dos and Don'ts

Save the Children Deutschland e. V. increasingly implements activities and projects making use of digital media.¹ By applying digital child safeguarding standards, we seek to ensure that all activities² and projects we offer involving digital media are safe for children. Staff members of Save the Children Deutschland e. V. and partner organisations who use digital media must ensure that they minimise online risks for children as far as possible. For this purpose, we have developed Digital Child Safeguarding Dos and Don'ts. These are to be understood as a supplement to the Codes of Conduct and the Information and Guidelines for Reporters.³

The wording of the Digital Child Safeguarding Dos:

- I only use my work account to communicate with children and not any private accounts (e.g. phone, email or Facebook).
- I always practise the two adults rule even in digital spaces. That means I am always supported by an additional adult when I communicate with children online. This applies in the same way to video calls and to the moderation of group chats on communication platforms such as Facebook.
- I ensure that as part of activities and projects with a digital component, children receive an introduction to the safe use of digital media tailored to their needs as a target group, and that they are adequately supervised in the further course of the activity or project.
- I take care that Internet-ready devices provided by us or a partner organisation ensure safe access to the Internet, for example by having parental control software installed and activated.
- I make sure that during video chats with children, the background is neutral and appropriate (e.g. not in the bedroom, no recognisable faces in photos, no valuables or status symbols).

The wording of the Digital Child Safeguarding Don'ts:

- I do not share any personal data of children and their legal caregivers (e.g. name, date of birth, address, phone number, name of school) online or offline unless written consent has been obtained from the legal caregivers and their children.
- I do not share my private contact details (e.g. phone number and email address) with people we reach through our work. If a child or an adult asks me for my private contact details or sends a contact request, via Facebook for example, I politely decline and refer to our Codes of Conduct for the protection of children and adults.
- I refrain from being alone with children online.
- I never present myself anonymously when I communicate with children online, but always using my real name and, if possible, my job title.
- I refrain from any form of digital violence against children. This includes making sure that any information shared with children online does not, for example, discriminate against them, hurt them, frighten them or endanger them.

¹ There are different ways of defining the term "digital media". We understand it to mean Internet-enabled devices (e.g. laptops, tablets and smartphones), our own website (www.savethechildren.de), social networks (e.g. Facebook, Instagram, Twitter, TikTok and Pinterest), messenger services (e.g. WhatsApp and Signal) and (live) streaming services (e.g. YouTube and Twitch).

² Examples of these include social media campaigns, online surveys and virtual meetings with children as well as interviews conducted with or by children.

³ See Annexes 1 to 4 of the Child Safeguarding Policy.

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