ECPAT INTERNATIONAL

COMPENDIUM ON CHILD SAFEGUARDING POLICY DEVELOPMENT AND IMPLEMENTATION

For facilitators, advisors, and consultants

Photo by Nikhita S on Unsplash

Date of publication: December 2021

Author: Dr Szilvi Gyurkó

Experts' contribution: Astrid Winkler, Stana Buchowska

Publication developed under the project: "Stronger to Protect Children Rights"

Project coordinator: ECPAT Austria

Project management: Astrid Winkler, ECPAT Austria

This publication and "Stronger to Protect" project was implemented in cooperation between the ECPAT International and ECPAT Austria and financially supported by the PORTICUS Foundation and ECPAT International.

Table of Contents

Glossary 04

About the Compendium 05

I. General information on safeguarding 06

The definition of safeguarding

Holistic approach

Basic information on violence

The structure and elements of a child safeguarding policy

II. The process of policy development 18

Primary considerations

How to tailor a safeguarding policy

Policy Development procedure Implementation

Implementation

Annex 41

Glossary

CRC	Child Rights Convention or UN CRC
CS	Child Safeguarding
CS Advisor	One who gives recommendation, expert, and professional advice in a safeguarding development process; advising is often strategic.
CS Consultant	One who provides information and professional services to an organisation in a safeguarding development and implementation process; consulting entails custom work and includes more details of implementation
CS Facilitator	One who closely supports and coaches the whole safeguarding development and implementation process; facilitation has the strongest participatory approach compared to consulting or advising
Focal point	The key stakeholder of the safeguarding policy implementation - a staff member with clearly defined roles and responsibilities, especially in the reporting process
KCS	Keeping Children Safe (organisation)
Partner organisation	Any legal entity committed to develop a child safeguarding policy in cooperation with a CS advisor, CS consultant or CS facilitator
SP	Safeguarding policy, child protection policy, child safeguarding policy

About the Compendium

This handbook is intended for CS consultants, advisors and facilitators and for those who are interested in providing assistance at different levels to partner organisations, institutions, and informal groups on developing and implementing safeguarding policies. The Compendium provides information in order to support NGOs on developing and implementing safeguarding policies.

The Compendium is divided into two parts: the first focuses on **background information** concerning child safeguarding in general, while the second part is more practice based and includes **hands-on advice** and case studies.

Regarding the fact that there is no standardised training or unified curriculum for professionals dealing with child safeguarding and providing support to safeguarding development, the Compendium contains references to a wide range of information beyond this handbook. Checking these sources therefore is highly recommended.

The second part of the Compendium is intended to help those working in the field with partner organisations to have a well-designed and successfully implemented safeguarding policy. The content of these chapters focuses on the different **ways and levels** of assistance (consultancy, advisory, coaching) as well as identifying which is the best way in a particular situation according to the circumstances and the general characteristics of the partner organisation.

The concept of safeguarding children is explored in this handbook as 'everybody's business' with detailed analysis providing potential insight into a broader scope and style of child protection. The structure of the Compendium reflects this **holistic** point of view.

"(Safeguarding Policy)...offers an excellent opportunity not only for the improvement of the quality and professionalism of those working with children, but most importantly, it will help to achieve a greater impact for children."

Paulo Sérgio Pinheiro,
UN independent expert on violence against children

I. General Information on Safeguarding

> ***"Child Safeguarding is the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children, that is that they do not expose children to the risk of harm and abuse and that any concerns the organisations have about children's safety within the communities in which they work, are reported to the appropriate authorities."***
>
> Keeping Children Safe Coalition

This Compendium is a collection of useful, **practice focused**, hand-on information about child safeguarding. However, introducing some theory is inevitable to better understand the concept of institutional (organisational) responsibility in this field.

Definition of Safeguarding

First, we should make a distinction between safeguarding children and child protection.

Safeguarding includes the prevention of abuse/maltreatment and a more general imperative to optimise children's well-being through principles and well-designed, tailor made procedures. **Child protection** is part of the safeguarding process focusing on children in risk or already having suffered harm. In the short term, child protection is the way in which we respond to harm while safeguarding is what we do to prevent harm. But why do we consider child safeguarding at all?

Professionals (mainly sociologists) have noted an increased preoccupation with risk in the late modern society[1]. There has been a tendency to **identify and categorize risks in most spheres of human activity**, and institutions are increasingly required to manage these risks. Around the millennium, several publications have noted how such preoccupations with the management of risk have affected professionals and organisations[2]. **Due to organisations being concerned with managing the risk of reputational damage as well as risks associated with their main tasks,** professional discretion has been increasingly replaced by a preoccupation with procedures and the possibility of an audit trail for all actions. This process is starkly evident in children's safeguarding services across several Western countries.[3]

1 Source: Beck, U.: From industrial society to the risk society in Theory, Culture and Society (1992) 9, 99-123
2 Source and further reading: Parton, N.: Safeguarding Childhood: Early intervention and surveillance in a late modern society. Basingstoke, Palgrave Macmillan (2006)
3 Source: Holland, S.: Trust in the Community in British Journal of Social Work (2014) 44, 384-400

An overall approach to child safeguarding is rooted in understanding the risks to children deriving from the partner organisations itself (staff, programmes, operations) and addressing those risks with measures that create child-safe organisations. To learn more about the safeguarding approach, please read: Child Safeguarding Standards and how to implement them. Keeping Children Safe.
Source: https://ec.europa.eu/info/sites/info/files/standards_child_protection_kcsc_en_1.pdf [4]

The first **Child Safeguarding Standards were launched in 2002** by a coalition of relief and development charities that later became known as Keeping Children Safe.[5]

Since then there has been a growing recognition that, besides risks to children from staff and associates, inappropriately designed programmes and poor operational management can also create the possibility of risks to children. In general, there are three different areas of child safeguarding. The **formal sphere is the statutory sector,** including professionals centrally involved in child protection work such as child and family social services, guardianship authorities, child welfare agencies, visiting nurses, police, etc. The **semi-formal area** of child safeguarding includes supporting services run by local municipalities, trained volunteers and NGOs at local or community level to reflect the particular needs of the children and families. The third area of child safeguarding consists of non-professionals - neighbors, and other individuals who try to provide some protective measure for risked children and families. This is a so-called **informal safeguarding.**

With a child safeguarding policy in place, clearly declaring their responsibilities, organisations become part of the semi-formal child protection systems and can collaborate with professionals of the formal sphere. Having a safeguarding policy has obvious positive effects in protecting children who get in contact with the organisation and/or the organisation's activities in any form. But there are also **benefits** concerning the community around the organisation, like raising awareness about parenting issues (online safety, etc.); sensitise the community about vulnerability issues; encourage social responsibility; increase commitment towards important humanitarian issues (social inclusion, peaceful conflict resolution, etc.).

Photo by Note Thanun on Unplash

4 Last opened: 10 December 2020
5 Source and further reading: Child Safeguarding Standards and how to implement them. Keeping Children Safe (2014)
Source: https://ec.europa.eu/info/sites/info/files/standards_child_protection_kcsc_en_1.pdf
Last opened: 11 December 2020

Holistic Approach
Children's Rights and Trauma Sensitive Procedures

> ***"Together with good inter-professional and inter-agency communication, sharing information about both individual and community-level risks, a culture of listening to local people provides the conditions which enable the particular situations and contexts that place children at risk in different communities to be identified and addressed."***
>
> (The Role of Communities in Safeguarding Children and Young People, 2009, Child Abuse Review. Vol. 19., 96.)

The holistic approach refers to the fact that child safeguarding related issues are closely linked to management, HR and events but it also influences the **FR (fund raising), communication and PR activities** of the partner organisation - in all horizontal and vertical dimensions.

In most of the cases, it is challenging to change the ways an organisation uses images of and stories about children to promote its work and engage donors. Social media and other online platforms increase the risk of using inappropriate information or visuals in communication thus it is necessary to expand the principles of safeguarding to these activities as well.

It is important to **address the entire organisation** with the values of safeguarding. This holistic approach ensures the stability and coherence of safeguarding. It is also a sustainability issue, as long-term operation is only possible if everyone within the partner organisation understands the real meaning of safeguarding and the different divisions can support each other in applying it. A holistic approach also promotes and facilitates mutual understanding of different perspectives. In addition, it creates a good opportunity to discuss important issues, like children's rights to privacy, the responsibility of helpers, the 'power of messages', the purpose of communication, etc. The issues every staff member (including event organizers, FR, communication, marketing and PR) should discuss and understand in relation to child safeguarding:

- The rule of 'the internet does not forget' and what does it mean for the social media platforms of the organisation (what kind of pictures are posted, how to present vulnerable children, how to sensitise the community about poverty, violence, deprivation, disability without causing harm, etc.);
- The absolute 'no-go zones', like images of undressed children, or children in inappropriate or sexualised poses;
- How to respect the privacy of children/families - stories/images must not allow to identify children, their home etc;
- Preparation/ training of journalists, photographers;
- Respecting legal norms concerning data protection, privacy law, rights of the parents to give permission to take pictures of a child, make recordings or to use any data about the child.

Clear understanding of the benefits and advantages of safeguarding is fundamental for a successful implementation.

Due to the holistic approach, the partner organisation can determine the context of its operation and adopt the policy and procedures that include risk assessment and violence prevention as well as reporting processes and case management in several areas. Having a child safeguarding policy also entails **running safe events and activities** for children (ensuring that preventive measures are put in place to safeguard children).

Children's Rights - Safeguarding Policy Principles

The common understanding of child safeguarding is that **children are holders of human rights declared in the UN Child Rights Convention** - CRC[6] (1989) and children's rights belong to everyone under the age of 18. A child safeguarding policy should state explicitly that the partner organisation is committed to safeguarding all children, without any kind of discrimination. A SP is irrespective of ability, ethnicity, faith, sexuality or culture which means that all rights (and full safeguarding) apply to **all children**. This is the first principle.

The second one is the "**best interest** of the child" meaning that all actions concerning the child should be in their best interest. It sounds obvious and clear but this is one of the most complex child rights. Thus, reading more about the concept behind the best interest principle is strongly recommended; for instance, in Jean Zermatten's paper[7], on the website of Humanium[8] or in General Comment No. 14 of the Child Rights Committee[9]. The latter source provides the most detailed information.

The third child rights principle concerning safeguarding is **participation**: the right of every child to be involved in processes and decisions which affect them. Every effort for the realisation of children's rights is to succeed only if children's point of view is also taken into account. According to the UN Convention on the Rights of the Child, children have the right to express their opinion and to be heard in all matters affecting them. Children are competent in issues affecting them and given the right questions, information, environment and support they are valuable partners in making a change in children's lives. Involving the beneficiaries of the organisation's activity into safeguarding development can be a good way to ensure the understanding of their interests and needs. From the point of view of safeguarding, this principle means active involvement of children in policy development as well as in implementation.

Recommended sources to read more about meaningful ways of child participation: General criteria of child participation on Save the Children website[10]; the practical "Child participation assessment tool" of the Council of Europe[11].

Sharing information about the safeguarding policy with child beneficiaries in **child-friendly language** and in child-friendly format (animation, video, etc.) is eminent and always challenging. Inspiring sources can be found on the website of Council of Europe[12], on ChildHub[13], or on the website of the UN Child Rights Committee.[14]

---

6 Source: https://www.ohchr.org/en/professionalinterest/pages/crc.aspx Last opened: 11 December 2020
7 https://www.childsrights.org/documents/publications/wr/wr_best-interest-child2009.pdf Last opened in 3 February 2021
8 https://www.humanium.org/en/the-childs-best-interest/ Last opened 3 February 2021
9 https://www2.ohchr.org/English/bodies/crc/docs/GC/CRC_C_GC_14_ENG.pdf Last opened in 3 February 20
10 https://resourcecentre.savethechildren.net/node/15984/pdf/general_criteria_of_child_particpation.pdf Last opened 3 February 2021
11 https://rm.coe.int/16806482d9 Last opened: 3 February 2021
12 https://pjp-eu.coe.int/en/web/charter-edc-hre-pilot-projects/child-friendly-material Last opened 2 February 2021
13 https://childhub.org/en/child-friendly-materials Last opened 3 February 2021
14 https://www.ohchr.org/EN/HRBodies/CRC/Pages/InformationForChildren.aspx Last opened 3 February 2021

The fourth principle is that all children have the right for a non-violent childhood and protection from all forms of violence. This **zero tolerance** principle is fundamental for safeguarding and emphasising the importance of the child rights approach in the whole process of policy development from situation analysis and priorities setting through implementation until monitoring and evaluation.

To learn more about children's rights, please visit UNICEF's website[15] for the short explanation of why these rights matter, or the thematic[16] website of the Council of Europe for a more complex introduction.

From a child rights' perspective, a safeguarding policy never creates new legal obligations for an organisation. Instead, the policy builds on internationally recognised standards and provides an operative framework for organisations to respect children's existing rights as established in the CRC. As seen in the chart below[17] , the child-rights approach is a **holistic** point of view that constitutes different needs, interests and rights of children.

Figure 1: Child rights in relation to organisational work principles

For additional recommended sources to learn more about children's rights approach please see **child rights programming** related documents of Save the Children. [18]

Primarily, parents are responsible for the execution and realisation of children's rights. But these fundamental rights of children have to be respected also by organisations, communities, and individuals. Through a safeguarding policy, organisations are able to express and practice this responsibility in a meaningful way.

15 Source: https://www.unicef.org/child-rights-convention/child-rights-why-they-matter Last opened 3 February 2021
16 Source: https://www.coe.int/en/web/commissioner/thematic-work/children-rights Last opened 3 February 2021
17 Source: https://www.unicef.org/csr/theprinciples.html Last opened: 7 December 2020
18 Source: https://resourcecentre.savethechildren.net/our-thematic-areas/cross-thematic-areas/child-rights-programming-crp Last opened 3 February 2021

Trauma Sensitive Approach

One of the fundamental principles of safeguarding policies is **realising the widespread impact of violence** and understanding potential paths to prevent causing harm. In case of violence, the staff members of the partner organisation should **recognise the signs and symptoms** of the consequences of the violence (potentially, the trauma) and they should actively seek to resist re-traumatisation (re-victimisation). The elements of this approach[19] are the core of a safeguarding policy. These elements are **safety; trustworthiness and transparency; peer support; collaboration and mutuality** and **empowerment** (voice and choice).

Regarding the fact that using a safeguarding policy often means violence-related interventions, it is really important to respect the needs of the survivor (victim); and it is also fundamental to work in a collaborative way with survivors (victims), their family, and other human services in a manner that will empower them.

Trauma-informed approach usually appears in the safeguarding policy training - especially, during the training of the focal points of the partner organisation. For instance, it is important to learn how they can properly conduct the hearing of victims/witnesses of violence. It is also important to have a proper attitude towards the victim/witness because the focal points can be promoters of healing - if the victim/witness feels being believed, being protected. Removing the perpetrator's access to the victim is also a key component of the trauma informed approach.

Concerning safeguarding policies, **trauma informed and trauma sensitive approach** is a relatively new requirement. More information[20] or additional consultation with a competent professional may be needed.

Photo by Joshua Clay on Unplash

19 For more information, visit: https://www.traumainformedcare.chcs.org/what-is-trauma-informed-care/ Last opened 12 December 2020

20 For more information, visit: https://www.plymouth.gov.uk/adultsandchildrenssocialcare/childrenssocialcare/academysocialworkplymouth/informationandresourcespractitioners/traumainformedpractice; https://dhhr.wv.gov/bhhf/ibhc/Documents/Presentations1115/BH%20conferenceTICPrinciples%20%20Case%20Examples%20FINAL.pdf Last opened: 15 December 2020

Basic Information on Violence

Most violence against children involves at least one of seven main types of interpersonal violence that tend to occur at different stages in a child's development:[21]

Maltreatment	(including violent punishment[22]) involves physical, sexual and psychological/emotional violence; and neglect of infants, children and adolescents by parents, caregivers and other authority figures, most often in the home but also in settings such as camps and schools. In organisational perspective, anyone can be such an authority figure (volunteers, staff members, employees, etc.) if their job involves caring, teaching, supervising children.
Bullying	(including **cyber-bullying**) is unwanted aggressive behaviour by another child or group of children who are neither siblings nor in a romantic relationship with the victim. It involves repeated physical, psychological or social harm, and often takes place in schools and other settings where children gather, and/or online.
Youth violence	is concentrated among those aged 10–29 years, occurs most often in community settings between acquaintances and strangers, includes physical assault with weapons (such as knives) or without weapons, and may involve gang violence.[23]
Intimate partner violence	(or **domestic** violence) involves violence by an intimate partner or ex-partner. Although males can also be victims, intimate partner violence disproportionately affects females. Among romantically involved but unmarried adolescents it is sometimes called "dating violence".

21 This is a short section and it clearly does not contain enough information for the facilitators. The only purpose of this section is to provide a context, and keep the relevant information together.

22 Homicide statistics represent an extreme violence that is shocking but relatively uncommon in the lives of children. The data show that far more children experience violence in the form of discipline - usually in their own homes and from a very young age. On average, **about 6 in 10 children worldwide (almost 1 billion) between the ages of 2 and 14 are subjected to physical (corporal) punishment by their caregivers on a regular basis.** For the most part, children are exposed to a combination of physical punishment and psychological aggression.

23 As children grow up, they become more vulnerable to other forms of aggression, including violence inflicted by their peers and intimate partners. Worldwide, more than one in three students between the age of 13 and 15 experience bullying on a regular basis. The experience of violence continues into late adolescence. Among girls aged 15-19 worldwide, almost one quarter (around 70 million) said they were the victims of some form of physical violence since age 15. Children with disabilities are 3-4 times more likely to be abused than others. Source: https://www.unicef.org/publications/files/Hidden_in_plain_sight_statistical_analysis_Summary_EN_2_Sept_2014.pdf Last opened 14 December 2020.

Sexual violence	includes non-consensual completed or attempted sexual contact; non-consensual acts of a sexual nature not involving contact (such as voyeurism or sexual harassment); acts of sexual trafficking committed against someone who is unable to consent or refuse; and online exploitation.[24]
Emotional or psychological violence	and witnessing violence includes restricting a child's movements, denigration, ridicule, threats and intimidation, discrimination, rejection and other non-physical forms of hostile treatment. **Witnessing** violence can involve forcing a child to observe an act of violence, or the incidental witnessing of violence between two or more other persons.
Commercial exploitation	using a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social emotional development. It includes, but is not limited to, **child labour.**

Table 1: Type of violence by age group affected [25]

	Maltreatment	Bullying	Youth violence	Intimate partner violence	Sexual violence	Emotional or psychological violence
18Y	●	●	●	●	●	●
11Y -17Y	●	●	●	●	●	●
5Y -10Y	●	●			●	●
0Y -5Y	●				●	●

24 Around 120 million girls worldwide (slightly more than 1 in 10) have experienced forced intercourse or other forced sexual acts at some point in their lives. Boys experience sexual violence too, but to a far lesser extent than girls. As with girls, incidents of sexual violence among boys most often occur for the first time between the ages of 15 and 19 and the most commonly named perpetrators are family members, trusted persons from the child's environment and current or former intimate partners. Source: https://www.unicef.org/publications/files/Hidden_in_plain_sight_statistical_analysis_Summary_EN_2_Sept_2014.pdf Last opened 14 December 2020.

25 Source: Inspire - Seven Strategies for Ending Violence Against Children. WHO. 2016. p16

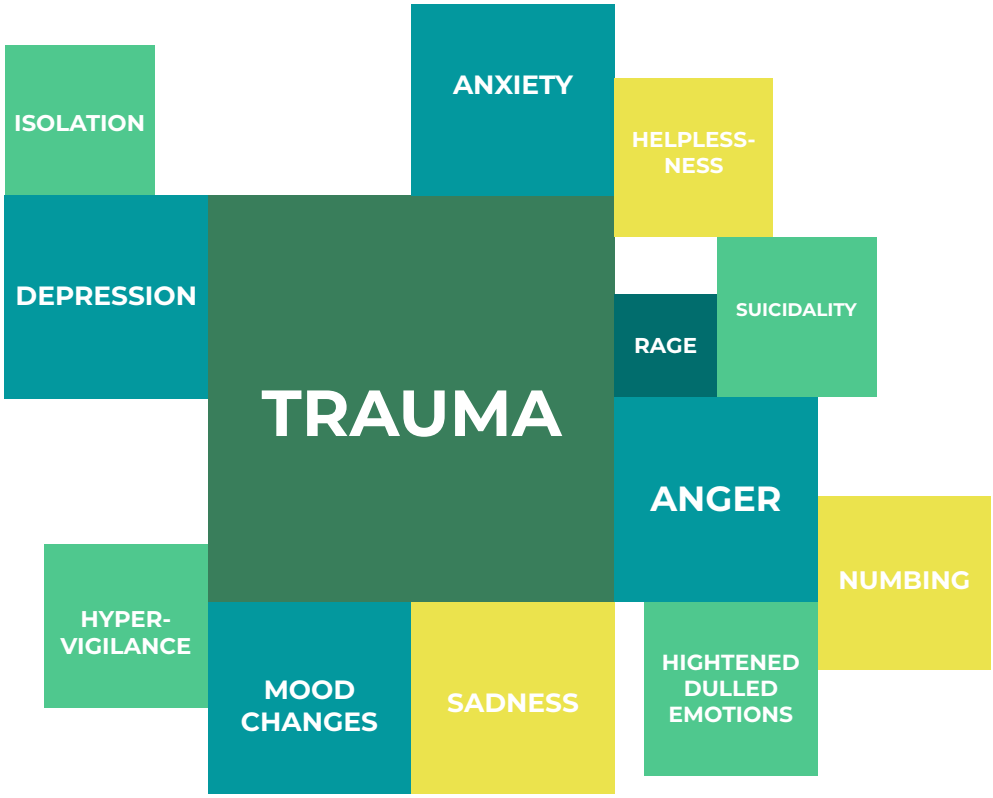
Consequences of Violence

The immediate and long-term public health consequences and economic costs of violence against children undermine investments in education, health, and child well-being, and erode the productive capacity of future generations. Exposure to violence at an early age can **impair brain development** and damage other parts of the **nervous system**, as well as the endocrine, circulatory, musculoskeletal, **reproductive, respiratory and immune systems,** with lifelong consequences. Strong evidence shows that violence in childhood **increases the risks of injury;** HIV and other sexually transmitted infections; mental health problems; delayed cognitive development; **poor school performance** and dropout; early pregnancy; reproductive health problems; and communicable and noncommunicable **diseases**.

Despite the high prevalence, violence against children is often hidden, unseen or under-reported. Its hidden nature is well documented - for example, a meta-analysis of global data finds self-reported **child sexual abuse 30 times higher and physical abuse 75 times higher than official report would suggest.**[26]

Violence against children is a multifaceted problem with causes at the individual, close relationship, community and societal levels, so it must be simultaneously confronted on several different levels. Developing and implementing a safeguarding policy serves a dual purpose in this regard. At community level, it creates a safer environment, and reduces risk factors through changing organisational culture and practices. While at societal level, a safeguarding policy ensures the execution of the legal norms prohibiting violence against children.

Figure 2: Impact of trauma on the survivor



26 Based on 'Hidden in plain sight - statistical analysis. UNICEF. 2014. Source: https://www.unicef.org/publications/files/Hidden_in_plain_sight_statistical_analysis_Summary_EN_2_Sept_2014.pdf Last opened 14 December 2020.

The concept of child safeguarding includes a focus on the role of bystanders and third parties in violence prevention. Violence never happens only between the perpetrator and the victims. There are always members of the family, community, society who may observe what is happening with a child. From the point of view of safeguarding, the reaction of bystanders is key and it is part of the policy implementation to encourage positive attitudes, like:

a.
Taking action instead of ignorance/turning a blind eye to violence;

b.
Always be aware of the 'do no harm' principle;

c.
Initiate interventions to prevent violence;

d.
Take responsibility in the community (violence is never a privacy issue);

e.
Being committed and persistent following the safeguarding principles.

Persistence is important because violence usually has a **cyclical pattern** and can happen repeatedly. Sometimes bystanders do not see the violence, only the consequences or the non-violent phase of the cycle of abuse (excuses, guilt). This cyclical nature of violence should be highlighted in the training of the focal points of the partner organisation together with the potential consequences, symptoms of a violent act. It is recommended to use case studies to illustrate the role of bystanders in different situations and it is also recommended to use role plays during the training to help understand the responsibility of bystanders.

To learn more about this topic and the relevant training tools, please read: KCS developed "Training tools for facilitators".[27]

The Structure and Elements of a Child Safeguarding Policy

> ***"Don't think that you can prevent all possible abuses. The way you respond to violence is as important as preventing it."***
>
> (Keeping Children Safe)

As described previously , there are three categories of safeguarding standards:[28]

1. Policy

The partner organisation has written policies that describe how the organisation aims to prevent harm to children and sets out how it responds to incidents. In terms of content, as a best practice the policy should:

27 Source: https://resourcecentre.savethechildren.net/node/8560/pdf/kcs_understanding_2014.pdf Last opened 22 December 2020
28 Relevant source: Safeguarding Guidelines for ECPAT-Partners

- Describe **how** the organisation is committed to preventing and responding appropriately to harm to children;
- **Express** the belief that everyone should be protected from all forms of abuse, neglect, exploitation and violence;
- **Commit** to a zero-tolerance approach towards harm against children;
- Openly **communicate** its safeguarding policy within its organisation;
- Conduct a risk assessment indicating the key safeguarding risks, accompanied with a set of measures aimed at risk minimization;
- Develop a written **code of conduct**, applicable to anyone who has contact with the vulnerable individuals (partner's staff, volunteers, trustees, visitors), specifying unacceptable behaviour towards vulnerable individuals.

2. People

The partner organisation:

- Provides a safeguarding awareness **training** for staff;
- Places clear **responsibilities** and expectations on its staff and supports them in understanding and acting in line with the safeguarding policy;
- Appoints one (senior) member of staff who is charged with and capable of dealing with safeguarding concerns and incidents (**focal point**);
- Cultivates an open **culture** where any safeguarding concerns can be shared.

3. Procedures & Accountability

The partner organisation has, to the extent permitted under local laws:

- Procedures in place to regularly **monitor**, review and update its safeguarding policy and the effective implementation thereof;
- Robust selection and **recruitment-screening** processes through reference and background checks;
- Internal procedures that enable staff to **report** any safeguarding concerns;
- Processes in place to ensure the **safety** of victims and whistle-blowers involved in incidents and to report violations of law to the local authorities;
- Employment contracts provisions allowing for the dismissal, suspension or transfer of any employee (or apply other legal **consequences** against) who breaches its safeguarding policy.

Child safeguarding policy may fulfill all the above mentioned requirements in a well-designed, tailor made way. The main role of the CS advisor/ CS counselor/ CS facilitator is to support this policy development and implementation process according to the circumstances and special characteristics of the partner organisation.[29]

Despite the particularities of the policy development in each and every partner organisation, the final result should be a Safeguarding Policy that covers all the following elements:

29 The second part of the Compendium reflects this job.

Introduction	A brief introduction to the policy, why it has been developed and who is covered by its provisions.
Policy statement/ commitments/ values	The partner organisation should make a statement to keep children safe from harm and, where appropriate, to promote their well-being and development. The statement should also refer to the partner organisation's overall mission.
What is the problem the partner organisation is trying to address?	State the partner organisation's understanding of safeguarding children, the problem of child abuse and overall risks of the organisation. Include definitions.
What is the partner organisation intending to do about it?	This is the main part of the policy and needs to include and describe: • Risk assessment/risk mitigation • Safe recruitment/ HR consequences of safeguarding violations • Safe marketing, communication and fundraising • Behaviour protocols/code of conduct • Education/training • Safe programme design • Communications/guidelines • Management responsibilities • Reporting/responding to concerns • Implementation and review • Regular monitoring and evaluation
Special regulations	According to the operation of the partner organisation, some special regulation may also be needed reflecting the particularities. For instance, • The partner organisation runs online services for children (helplines, chat platforms); • There are regular visits by volunteers, other adults; • There are meetings, visits, events between different groups of children; • The partner organisation works in emergency situations or in multicultural environments.
Case management	A brief introduction to the policy, why it has been developed and One of the most important parts of safeguarding is the clear procedure of case management with well-defined roles and responsibilities within the partner organisation. The safeguarding policy has to contain rules and regulations to ensure that all allegations are investigated even if the highest level of an organization is confronted with them.
Dissemination	The partner organisation should ensure to share the safeguarding policy and its most important details (with special focus on the reporting process and the focal point contacts) with the beneficiaries (children, their families, community members, etc.) in a proper way. Child-friendly language materials are required.

II. The Process of Safeguarding Development

> ***"A child safeguarding policy should set out what the organisation wants to say about how it keeps children safe and recognise the needs of all children to be safeguarded."***
>
> Keeping Children Safe Coalition

In this second part of this Compendium, CS advisors, CS consultants and CS facilitators can find relevant, practical, hands-on information about how to support partner organisations in the policy development and implementation process.

Primary Considerations

Roles

At first, it is necessary to define **what is the difference between the role and activity of a CS advisor, CS consultant and CS facilitator**. Everyone has a self-awareness and a professional identity that defines one's understanding about competencies and roles. Some professionals prefer to keep the distance from the partner organisation because they believe that it provides better judgment and neutrality. Others prefer to be involved more thus they have better understanding about the partner organisation. We all work with our personality and, vice versa, our personality is in our job. Consequently, there is neither hierarchy between these different roles or any particular expectation. In addition, beyond these personal preferences, there are other factors influencing the actual role of the professional, such as the characteristics of the partner organisation or any actual challenge (e.g.COVID-19 or a scandalous case). In all three ways of supporting the partner organisation, the professionals have to **understand the operational dimensions** of the organisation as well as its culture to focus mainly on three elements: people, policy and procedures.

Practically, the way how the professional works (according to which role) is based on one's understanding about what the job is and how it is the best to perform.

Table 2: The characteristics of the different supporting roles in a child safeguarding policy development and implementation process

Child Safeguarding Advisor	Child Safeguarding Consultant	Child Safeguarding Facilitator
One who gives recommendation, expert, and professional advice in a safeguarding development process.	One who provides information and professional services to an organisation in a safeguarding development and implementation process.	One who closely supports and coaches the whole safeguarding development and implementation process.
Advising is often strategic.	Consulting entails custom work and includes more details of implementation.	Facilitation has the strongest participatory approach compared to consulting or advising.
Advising is usually preferred in case of a least open organisational culture	Consulting is effective in case of closer cooperation/open organisational culture.	Successful facilitation needs collaboration and transparency.
Scheduled timeline; less personal meeting; limited working hours.	Timeline is scheduled but often prolonged; direct conversations and more personal meetings; extended working hours.	Timeline is scheduled but often prolonged; direct conversations and more personal meetings; extended working hours; involvement in trainings.

The characteristics of these roles have no textbook differentiation and there are no strict boundaries between them. Still Table 2 helps to understand the limits of advising, consulting and facilitation as well as it presents their benefits. This is the first step to pose the questions: "Who am I in this situation? What is my role?" The second step is to ask: "Why does this organisation want to develop a safeguarding policy?"

Motivation and Persuasion

What motivates a partner organisation to develop and implement a safeguarding policy is one of the most important questions and the answer can be a long list ranging from 'previous scandals' through 'the fear from scandals' to the deep commitment until the 'do no harm' principle.

However, the most common narratives are that developing and successfully implementing a child safeguarding policy:

- States the organisation's commitment on children's rights;
- Shows that the organisation takes responsibility to the wellbeing of future generations;
- Makes an impact on social development in the community;
- Declares that children are the most valuable stakeholders of the organisation (as future employees, customers, volunteers, donors, supporters);
- Builds a brand that is responsible.

The above mentioned narratives are also **selling points.** We can use them during negotiation and also for persuasion.

The motivation can be different but understanding the risks to children from the organisation as well as implementing proper measures to mitigate those risks is eminent. Even the most opportunist organisation can admit that having a safeguarding policy is useful because it reduces risk of reputational damage. Violence, child abuse and poor management of these cases can damage the trust of supporters/donors and can lead to loss in organisational value. Minimising the **risk of reputational damage** is a general benefit and easily understandable for every staff member.

'Understanding the risks' sounds easy but it also means acknowledging that the operation of the organisation and/or the staff may not be perfect. In case of previous scandals, 'imperfection' is obvious. But there are very easy ways to "solve" such situations without any kind of understanding either with "naming and blaming" or hiding. The latter is the "best solution" if the management acts in the name of the best interest of the organisation - instead of the best interest of the child. In addition, "imperfection" could mean that somebody is responsible for the existence of those risks - in general, those responsible persons are the leaders of the organisation. Consequently, lack of previous scandals or problems in the life of an organisation can either mean perfect operation or perfection of the management in hiding and in negotiating harmful situations behind the scenes.

Thus, it is clear that the first and fundamental need of developing a safeguarding policy (acknowledging and understanding the risk factors) is the hardest because it naturally means acknowledging and understanding problems, mistakes and acknowledging the responsibility for them. In one word: **transparency**. It is challenging, if the procedures, policies are not transparent in the organisation in general. If permitting information or data to pass through different levels of the organisation is exceptional or unfamiliar, then the implementation of a safeguarding policy will be really hard. For the CS advisor/ CS consultant/ CS facilitator, it is important to know that difficulties about a safeguarding policy are often deeply rooted in structural or cultural challenges of the partner organisation - like the lack of transparency -, but solving these problems are out of their competence. In a lot of cases, staff members clearly see the need of a safeguarding policy while the management turns a blind eye to the problem. In some cases, the community where the organisation operates or the beneficiaries of the partner organisation recognise the problems but the organisation refuses to acknowledge . These are difficult situations for a CS advisor/ CS consultant/ CS facilitator due to the lack of understanding and acknowledgment. But still there are some **strategies** and **tactics** that can be used in these situations:

- Encourage the committed staff members to form a 'coalition', stand out and express their opinion (always recommended to act in a group not as an individual!);
- Provide the committed staff members with issues / narratives of persuasion;
- If Board decision is needed to start a policy development, consider potential persuasion strategy for each Board member (think in individual persuasion - instead of convincing the Board as a group);

- List cases/scandals that have already reached the public (present the damages it caused to the organisation);
- Use global movements as selling points, like #metoo;
- Use public scandals of other organisations as an opportunity - at the time when the fear from reputational damage is stronger;
- Organise events/platforms or conduct survey/research where beneficiaries can express their opinion about the operation of the organisation (including the risks).

To seek and grope what is the best strategy and which one has potential are part of the preparatory meeting with the partner organisation. The CS advisors are usually not involved in operating such convincing strategies. However, CS consultants and CS facilitators may **discuss** these strategies with the committed staff members and **help** them to be prepared for these tactics. But it is not even part of the CS facilitators' role to be actively involved in these activities as this could compromise their professional impartiality. The CS consultant and CS facilitator should be supportive but neutral in these situations (being aware of the limits of roles and competences).

Developing a safeguarding policy is a **mutual** learning process between the supporting person and the partner organisation. First and foremost, the CS advisor / CS consultant/ CS facilitator has to provide opportunities for the staff to understand what child safeguarding means and what commitments are needed under the policy. Group discussions, in-person meetings, webinars, presentations, posters are good ways to raise awareness.

It is key to set-up an **in-house team** with responsible staff members (including the focal-point). The main way of communication between the supporting person and the partner organisation is through this team. Creating a **participatory environment** is also crucial. Procedure-wise, it means drafting and revising the safeguarding policy more than once, involving every competent person in the organisation.

Everyone in contact with children has a role to play in their safeguarding. They can only carry out this role confidently and effectively if they have the right attitude towards children, are well aware of child safeguarding issues and have the necessary knowledge and skills to keep children safe. The CS facilitator may have the responsibility to provide training and development opportunities for their staff as well as adequate information. This is a stage also to increase commitment and motivation within the partner organisation. Later, the focal point (or team) and designated leaders of the organisation will take this place.

Having a safeguarding policy is not compulsory for most of the organisations so it is clear that they can say no to the cooperation. However, it is rarely discussed that the CS advisor/ CS consultant/ CS facilitator also has this right in situations, when:

a.
The organisation is not really committed, they declare that they are not interested in real implementation or the Board/Director refuses to sign, legally adopt the policy;

b.
The organisation is not cooperative, they hide facts, information, corrupt the policy development procedure or try to corrupt the facilitator;

c.
During the policy development/ implementation, the organisation has to face a child abuse case and they refuse to take responsibility (or they act against the fundamental principles of the safeguarding policy).

In situations like these, it is obvious that the organisation tries to use the facilitator contrary to the real purpose of the safeguarding policy. It is a dilemma here which is the less bad outcome. Pushing through a policy - so at least the organisation has 'something' or declaring that the policy (or the procedure) is defeated. The facilitator should make this decision concerning all facts and circumstances of the particular case.

The Culture of Safeguarding

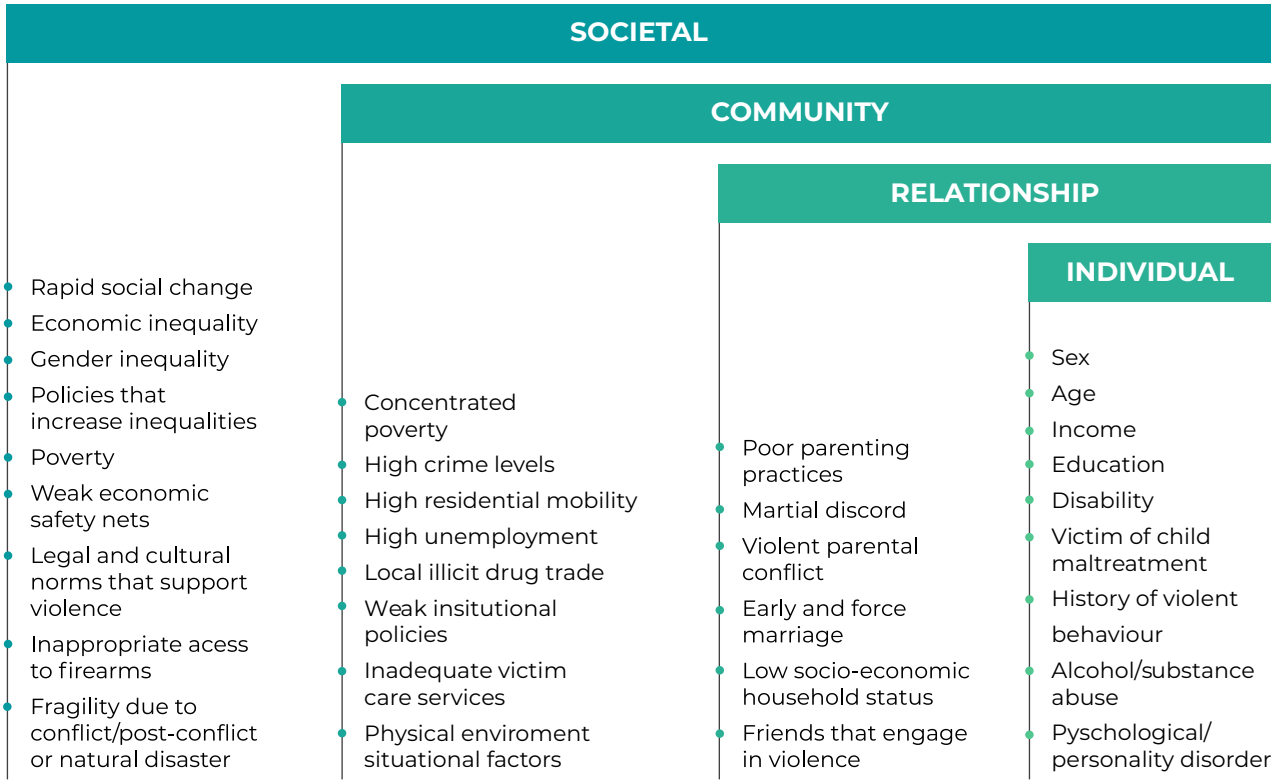
The **common sense**, the **general understanding** of child protection and the **public opinion** on safeguarding can play a key role in the development and implementation of a safeguarding policy. The concept of child safety is based on history, tradition, and conventional role of communities. The professional who assists the partner organisation has to be aware of these factors especially in case of cross-border cooperation in which cultural issues are more significant.

A key factor that makes children and adolescents, particularly girls, vulnerable to violence and increases the likelihood that boys and men perpetrate such violence is social tolerance of both victimisation of girls and perpetration by boys and men. Often this maltreatment or exploitation is perceived as normal and beyond the control of communities which, alongside shame, fear and the belief that no one can help, result in low levels of reporting - low levels of safeguarding.

In a safeguarding policy, it is important to recognise that different forms of violence share common root causes thus they often occur together and one can led to another. **Through safeguarding programs, organisations could decrease the penetration of violence in the whole society.**

The safeguarding policy is always in harmony with the child protection rules but sometimes is conflicting with the local concept of child safeguarding. At first, the organisation has to be aware of this situation, and then (together with the CS counselor or CS facilitator) they have to figure out a way to mitigate this risk. In advisory-kind of support this issue is less determined.

Figure 3: Social ecological model for understanding and preventing violence against children



The Character of the Partner Organisation

From start-ups to 'historical' ones, every organisation has its own **life cycle**. Developing a safeguarding policy is ideal for the start-ups and for 'fresh' ones (with 3-5 years of operation). In general, these organisations have no - or only a few - shadows from the past, and they are usually more flexible, adaptive and open. Historical organisations have more fixed structures, set informal procedures, undeviating staff members - and sometimes they have scandals from the past. Obviously, there are always exemptions. But it is necessary to choose the way of assistance according to the general characteristics of the organisation. **Other characteristics** beyond the life cycle of the organisation that could be important:

- The size of the organisation;
- The inner-structure/hierarchy;
- Departments/in-house services (fund raising, marketing, communication, advocacy);
- Direct/indirect activities with children;
- General HR strategy (ways of recruitment, trainings, conflict resolution, case management, volunteers);
- Policies and the way of policy making.

The professional who provides assistance for a safeguarding development process should be **familiar with the above mentioned factors** at the very beginning of the whole process and (s)he has **to tailor make the ways of assistance** (the strategy of support) according to these characteristics. For instance, advisory-type support usually fits partner organisations with stronger hierarchy and more experience in policy development while facilitation needs more flexibility and openness.

Structural and Non-structural Requirements

The following table maps the relationship between the CS advisor/ CS counselor/ CS facilitator and the partner organisation by listing the structural (legal, written, statutory, formal) and non-structural (informal, behavioural and attitude based) needs of safeguarding policy development. Regardless of the level of commitment, these requirements should be fulfilled during the whole policy development procedure.

Photo by Katerina Holmes on Pexels

Table 3: Structural and non-structural requirements of policy development (and implementation)

Structural requirements	Non-structural requirements
Contract/Terms of reference (to define the purpose and the structures of the policy development project)	Appropriate plan developed with the organisation (agreeing on budget, outcomes and timing)
In-house team/Focal point (responsible staff member(s) for policy development)	Presence (competent staff members attend all sessions promptly and ready)
Confidentiality (respecting data protection and confidentiality rules)	Transparency and regular communication about the safeguarding
Follow-up, Monitoring and Evaluation Plan (measuring goal achievement and the outcomes of the policy)	Ownership (the organisation makes decisions and owns the results/takes responsibility for its acts)
Formal approval by the organisation's management (legal implementation of the policy; signed, voted, adapted by the Board/ director)	Respect the culture of the organisation (non-judgmental way of cooperation)
Responsibility (managers have specific responsibility for overseeing the implementation of the policy)	Raising awareness (on child safeguarding related issues)
Paramount policy (SP applies to all the organisation's staff, volunteers, associates and partners)	Commitment (to the fundamental principles and values of child safeguarding)

These requirements are the **minimum** to carry out a development process where the CS advisor/ CS counselor/ CS facilitator can establish a successful working relationship with the organisation. In addition to the above mentioned requirements, there is a strong need to:

- Develop an open and honest working relationship;
- Create effective ways of communication and support;
- Ensure that CS advisor/ CS counselor/ CS facilitator has relevant knowledge about the partner organisation;
- Establish disciplined, well-structured working methods.

To fulfil these requirements, the CS advisor/ CS counselor/ CS facilitator should create a supportive, **learning environment** where everyone shares knowledge and experiences to learn from each other and this is recognised and rewarded. While presenting clearly the core values of safeguarding the CS counselor/CS facilitator should avoid/refrain from blaming/criticising and should emphasize that anyone can make mistakes. Policy development can be successful only through an **actively encouraging creativity**, idea generation and innovation in the partner organisation.

Finally, the last requirement is **time**. It is said that Rome was not built in a day meaning that every stable and successful instrument needs time to be set-up. Developing a safeguarding policy is a **long-term** cooperative relationship between the organisation and the professional providing assistance. Based on experience, it's a 6-12 month collaboration from preparation until the last training (advisory-like assistance can be significantly shorter). In case of consultation and facilitation this collaboration may not end with the finalisation of the safeguarding policy. The assisting professional usually follows-up the implementation and provides some kind of mentoring to the organisation if needed.

Developing a safeguarding policy is an in-depth procedure thus it takes time to do it properly.

How to Tailor a Safeguarding Policy

> ***"No policy can offer complete protection for children but following the safeguarding rules minimises the risk to children of harm. "***
>
> (Keeping Children Safe)

The safeguarding policy should be designed **according to the particular needs** of the organisation. The policy (principles, procedures) adopted by the partner organisation needs to be tailored not just lifted straight from a generic manual or model policy.

In most cases the CS advisor/ CS counselor/ CS facilitator uses a template as a starting point or lists the basic elements of the safeguarding policy as a structural framework. But **there is no off-the-shelf, one-size-fits-all policy document.**

Tailoring the safeguarding policy means (1) proper preparation, (2) defining the needs of the organisation clearly and specifically, (3) making the policy realistic, (4) training all employees in policies and procedures through meaningful case studies and relevant every-day situations, (5) reviewing the policy implementation and redesigning it if necessary.

As seen in these points, tailoring is a process and it needs constant attention and awareness of the particularities of the partner organisation.

Tailoring is also about **assessment**. The safeguarding policy needs to make sense in respect of the partner organisation's size and internal structure. Since the safeguarding policy represents a holistic approach, it is also important to assess the relevant department's (responsible staff member) **workload, responsibilities, procedures and already existing policies** as it was described in the previous chapter.

Designing the safeguarding policy according to the needs and particularities of the organisation also means determining **the best way to implement the policy**. There are different options from deploying in stages to full roll-out as described in the last chapter of this Compendium.

To achieve the goal of a well-tailored safeguarding policy, the CS advisor/ CS consultant/ CS facilitator should **collect information** regarding the **field work and other child related activities of the partner organisation**. Both the supporting professional and the partner organisation should understand the organisation's impact on children and the associated risks.

To identify these impacts, it is important:

- To list all the relevant **activities**;
- To understand the different **nature** and **levels** of contacting children by staff members volunteers, associates or partners (direct, personal or indirect contact; advocacy, communication, FR, etc.);
- To collect **policies and procedures** being already in place related to child safeguarding (including informal policies);
- To identify the **risks** related to the activities related and how the organisation can **mitigate** them;
- To identify the best way of **reporting** child safeguarding related incidents;
- To identify the **key members** of the staff and other stakeholders within and around the organisation who need to be involved in the policy development, implementation and the ownership of the SP.

The safeguarding policy has to be **integrated** with existing processes and systems (risk assessment and mitigation strategy, strategic planning, budgeting, recruitment, performance management, partner agreements). Integration also means changing or modifying other procedures and policies because of the safeguarding policy.

Legal Compliance

While it should go without saying, the CS advisor/ CS consultant/ CS facilitator should ensure that the proposed **safeguarding policy is not in conflict with any legal norms and regulations**. This entails collecting all the relevant information about the following items - which is a part of the policy development process (in preparatory phase):

- National child protection system;
- Criminal law related to online safety, child maltreatment and other forms of interpersonal violent acts (the legal terminology of different forms of violence);
- Civil law on parental rights, protecting privacy of children;
- Rules of compensation in case of causing harm to a child;
- GDPR and other law on data and information protection;

- Reporting system related to child abuse and neglect;
- Steps and ways of intersectoral cooperation, focal points in the statutory child protection system;
- Responsibilities of organisations dealing with children (responsibilities of the legal representatives of organisations);
- Institutional obligations concerning child safeguarding.

The safeguarding policy reflects the rights of children to protection from all forms of maltreatment, harm, violence, abuse and exploitation as outlined in the **UN CRC**.

It is recommended that CS consultants/CS facilitators check the last **Concluding Observation** of the country where the organisation is located/operates. In this document, the Child Rights Committee highlights the most important problems in relation to children's rights and child protection.

The safeguarding policy also has to fit into the statutory child protection system with special focus on **reporting** child abuse. Designing the reporting procedure is one of the most important elements of policy development. It needs to encompass reports being made by children and communities as well as reports by staff members, volunteers, associates and partners. The attitude of reporting is deeply rooted in the culture of the organisation and closely linked to core values like transparency, commitment, social responsibility.[30]

Reporting abuse to local or national authorities may not be straightforward if the reports are not handled properly. There are, however, always organisations working nationally and locally that can provide advice on reporting cases, and local mapping will identify these.

The safeguarding policy also has to fit into the statutory child protection system with special focus on reporting child abuse. Designing the reporting procedure is one of the most important elements of policy development. It needs to encompass reports being made by children and communities as well as reports by staff members, volunteers, associates and partners. The attitude of reporting is deeply rooted in the culture of the organisation and closely linked to core values like transparency, commitment, social responsibility.

Reporting abuse to local or national authorities may not be straightforward if the reports are not handled properly. There are, however, always organisations working nationally and locally that can provide advice on reporting cases, and local mapping will identify these.

Some examples of reporting:

a.
Complaints boxes (placed where children are comfortable using them);

b.
Helplines, help chats, mails;

c.
Designated child safety or child welfare agents (trusted adults);

d.
Peer reporting (through trained peer advisers working in a team with the child safety focal point of the organisation).

30 In cross-border consultancy or facilitation, the following questions are also important to investigate related to the justice system and the legal background: Is the organisation located in places where child abuse is prevalent? Is the organisation located in places where laws and authorities are weak in responding to child abuse?

Rules and regulations on reporting are closely linked to the partner organisation's responsibility in **case management**. The policy has to provide a clear definition of 'what is violence', 'in which violence cases does the partner organisation have responsibility to react' as well as 'what are the proper reactions'.

The obligation of violence prevention is general and paramount which means a constant care and attention to avoid every potentially abusive, violent or negligent situation caused by any In general, the partner organisation has to define its responsibility in relation to internal cases. staff member or partner of the partner organisation. The details of prevention are a massive part of a SP. But beyond the general responsibility of prevention, the partner organisation has obligations to react properly if violence happens after all. This is another solid part of a SP. The reactions start with the proper rules of reporting (Who, How, What, When, Whom), and follow the recognition and engagement of competences.

In general, the partner organisation has to define its responsibility in relation to internal cases. If the violent act occurred within the organisation or during an organisational operation, the case is internal. The case is also internal if the perpetrator is linked to the partner organisation (as partner, staff member, volunteer, employee, mandate, board member, etc.). In internal cases, the clear procedure of reporting and reacting must happen in accordance with the rules defined in the safeguarding policy. What are the usual step-by-step reactions in an internal case?

- Written report filed by a beneficiary, child, family members, staff members, etc. (anyone observed or informed about the violent act);
- The focal point registers the report and establishes the inner procedure according to the severity of the violent act (organise a hearing, inform the focal team, investigate the case, file a report to the authorities, file a report to the Board/Head of the partner organisation etc.);
- The responsible person or team applies the consequences of the violent act (disciplinary measures, suspension of the suspected staff member, termination of contracts, etc.);
- Actions of victim support;
- Debriefing the inner community of the partner organisation about what happened - if necessary, inform the public about the case.

There are situations, where the focal point or other staff member of the partner organisation are alerted about a violent act perpetrated in the community or in the family of a child beneficiary of the partner organisation. In these cases there is no close link between the violence and the partner organisation however, the zero tolerance principle binds the organisation to take steps even in these cases. According to the best interest of the child, these steps can be reporting the case to the statutory child welfare agencies, organising a meeting with other competent professionals to discuss the situation or providing special services to the child, his/her family.

The particular rules about case management can differ depending on the characteristics of the partner organisation but it is necessary to design a closed procedural circle that starts with a report and closes with the debriefing of the person filing the report.

A case management is designed decently if:

- There is more than one way of reporting including anonymous reporting;
- Children can report directly;
- The focal point who is primarily responsible for handling the reports is competent, trained and can act independently (without any pressure of the Board or the Management);
- The focal point works in team

- There are clear regulations in the SP when reporting to the authorities is necessary;
- Transparency in the procedure is ensured (debriefing the person who filed the report, informing the Board and/or the community);

The quality of the case management is regularly monitored and evaluated.
Case management is not easy even if the above mentioned requirements are fulfilled. In cases of serious allegations (like sexual abuse or harassment) as well as in situations where suspicion arises with the management or the director of the partner organisation, the focal point can find himself/herself in a very challenging situation. At first, CS advisors/ CS counselors / CS facilitators should raise awareness about these potential challenges as being prepared (to prevent the problem) is the best way to handle them.

A good internal structure and mechanism in terms of case management ensure that allegations are investigated even if the highest level of an organization is confronted with the allegation. Appointing a competent focal point, or training one properly and keeping him/her independent is the fundamental principle of successful safeguarding, in addition, the reporting procedure should be in harmony with the legal requirements. Transparency, accountability, regular monitoring and evaluation are the key words in designing a safeguarding policy.

Photo by Tamara Bellis on Unsplash

The Policy Development Procedure

1. Preparation: Screening and Contracting

From the angle of policy development, screening is a process in which the CS advisors and CS counselors **check** the following information:

- The organisation legally exists
- The contact person represents the organisation or (s)he has the right to start policy development procedure.

Screening performed by a CS facilitator ensures that the right match is made between the work to be done and the person who will do it. During the screening, the CS facilitator c**ollects all relevant and available information** about the organisation (size, structure, activities), c**hecks public sources** and investigates the need of the organisation as well as its **motivation**.

- Official websites, social media platforms, statutory databases are checked
- In-person/online interview with competent staff members
- Commitment/clear motivation on the side of the organisation.

The **methods** of detailed screening can be in-person/online interview with staff members; searching available online sources (website, social media platforms, etc.); online/in person meeting with the managements; reference check. If the CS facilitator has doubts about the success of the cooperation between him/her and the partner organisation it is strongly recommended to step down and name another facilitator. If the CS facilitator or CS counselor recognises lack of real commitment, (s)he can increase the level of dedication by tactics and strategies mentioned in the previous chapter.

Example

In the 2000s an NGO needed a safeguarding policy to apply for an EU Grant. They got in contact with an advisor and told her that they need a SP within 3 months. They seemed committed to develop a real SP (not just having one because of the formalities). They dedicated an inner team of 3 staff members, in addition to the focal point who was the advocacy director of the NGO. The in-house team of the NGO worked closely with the SP advisor 15-20 hours a week in this project. Because of the rush, other staff members started seeing the SP project as a burden. The in-house team members suffered from the extreme workload and the constant feeling that there is not enough time to go deep into the details and design a really good SP. At the end of the day, the implementation of the policy remained superficial.

The CS facilitator and CS counselor has to keep in mind that commitment is a non-structural requirement on the side of the organisation. Obviously, the supporting professional is not exclusively responsible for the motivation of the organisation.

Contracting

Regardless of who took the first step (the CS advisor/ CS counselor/ CS facilitator or the organisation), making a contract about the details of the policy development process is always the supporting person's responsibility. In general, some preparatory work precedes contracting such as meeting with the leaders of the organisation and staff members or sending out a one-pager (leaflet) about child safeguarding.

The contract has to be **detailed** enough so that responsible decision makers of the organisation can presume the workload, timeline and financial needs of the project. But it is also important to leave the contract **flexible** enough for unforeseen, unexpected situations. In most of the cases, the supporting person works within a strict time frame and the contract ends when the organisation adapted the safeguarding policy. However, ideally, the facilitator should be mandated for follow-up and **monitoring**. When the facilitator provides a 'certificate' to the organisation (as verification) it is strongly recommended to extend the contract with the period of monitoring.

The preparatory phase of policy development is completed if there is:

- Written contract with timeline, contact names, confidentiality issues, training plans and budget
- Detailed and clear description of the policy implementation project
- Written commitment by the head of the organisation to adapt a SP at the highest level at the end of the project.

2. Auditing/Self-auditing/Risk Assessment

Auditing means a structured investigation **assessing** the partner organisation and its environment (community, partners, statutory child protection system, etc.), and **reviewing** the structural/non-structural requirements of policy development. During this task, the supporting professional should recognise the pitfalls (challenges, weaknesses) and make a plan how to handle these. In general, auditing is carried out by the CS counselor or CS facilitator in cooperation with the partner organisation but sometimes partner organisations conduct a **self-audit** or **risk assessment**. In practice it is quite rare that a CS advisor would provide detailed audits. They usually just check the results of the risk assessment.

Each written policy should be evidence based. The main source of evidence is a **risk assessment** which enables the partner organisation to recognise potential and actual risk factors in its own operation and develop strategies to reduce them. Child safeguarding related risk assessment includes seven stages: (1) Establishing the context, scope and setting of the organisation. (2) Identifying the organisation's potential impact on or contact with children. (3) Identifying and analysing the potential risks of that impact or contact. (4) Evaluating the risks in terms of likelihood they could occur and the seriousness of the impact on children. (5) Implementing strategies to minimise and prevent risk. (6) Reviewing and revising risks and preventative measures. (7) Communicating and consulting.

ECPAT provides particular toolkits of risk assessment. Keeping Children Safe and Terre des hommes also developed a standardised structure of risk assessment. (See Annex)

A **mapping** or **auditing** existing policies and procedures and identifying what is needed in addition to prevent harm and how to respond to appropriate concerns is also a key component. Auditing can be carried out by the CS consultant or CS facilitator but self-auditing tools are also available. The one developed by Keeping Children Safe is the best-known. (See Annex)

There are several ways to conduct a proper auditing or risk assessment depending on the characteristics and culture of the partner organisation. A CS counselor/CS facilitator rarely follows strict rules; (s)he sets up a system which fits best to the purpose of developing a good safeguarding policy. However, CS advisors usually use pre-prepared risk assessment tools.

This seems simple in theory, yet in practice there are instances where a special **transparency vs. confidentiality** conflict appears. Basically, it is a situation where the supporting professional needs to know more information than the partner organisation is willing to share. To mitigate risks emerging from this issue, the suggested protocol is: (1) the contract must contain clear confidentiality regulations; (2) the supporting professional should listen carefully to the concerns and should not put too much pressure on the partner organisation to share more information (while she has to be persistent); (3) the supporting professional should explain the reasons for transparency and explain the details of confidentiality; (4) re-tailor the rules if necessary.

It is strongly recommended to carry out the auditing or self-auditing with the **participation** of the beneficiaries of the partner organisation. When it comes to **child participation**, CS counselors or CS facilitators should contact a child participation expert to discuss alternatives of meaningful ways of child participation and develop an adequate plan for it.

Example
In the late nineties, a religious organisation supported a community based safeguarding project in a region where a lot of Roma people lived. The head of the project was a French professional living in Lausanne and it was his first field work. There was no Roma representation either in the project management or among the field workers. They did not even consult with community members when they started the project. The background materials of the project (including the safeguarding policy) were translated and not adapted.
The project was a complete failure.

Inspiring sources about the "culture of listening" are available on the website of Bond network[31], on ChildHub[32], or in the Child Safeguarding Guideline of Council of Europe[33].

The auditing/self-auditing/risk-assessment phase of policy development is completed if there is:

- An audit or self-audit report;
- A list of structural/non-structural requirements fulfilled;
- A plan of child participation.

3. Policy Development and Special Concerns

A good safeguarding policy outlines the key elements that should be in place to keep children safe and it also lists requirements that will help the organisation meet the policy.

The policy should describe good practices for the organisation to ensure that programmes, operations, staff and partners do not put children at risk of harm and should enable appropriate responses when concerns and incidents arise. As such, safeguarding policy provides a **comprehensive benchmark** for preventing harm to children and is complementary to other standards and principles.

Organisations already working with standards/policies, should use the policy development process to ensure their quality and accountability initiatives do include children and safeguards for children.

The safeguarding policy should be written in such a way that it is relevant and accessible in all contexts. However, this may be more difficult or challenging to implement in some countries and local contexts than in others. Thus the organisation should discuss the best way to apply the policy in the local context, the behaviour required by the partner organisation of its own staff and partners, and how it wants to be credible as child-safe organisations.

Regarding particular policies developed in the safeguarding procedure, one of the most important is the **code of conduct**. A code of conduct is a clear and concise guide of what is and what is not acceptable behaviour or practice for employees and associates of the organisation. It should include acceptable and unacceptable behaviour with regards to children. **All staff and associates including volunteers should agree to the code of conduct** when they are employed and/or start their assignment. It is an essential element of an organisation's child safeguarding policy and, when implemented properly, should reduce or limit the risk of child abuse from occurring.

It should also include actions the organisation will take in case the code is breached co or not followed correctly.

31 https://www.bond.org.uk/news/2019/03/facilitating-meaningful-child-participation-in-safeguarding Last opened 5 February 2021
32 https://childhub.org/en/legal-information/child-participation-guideline Last opened 5 February 2021
33 https://rm.coe.int/child-safeguarding-policy-children-s-rights-division-22-may-2018-as-up/16808c8b91 Last opened 5 February 2021

Staff who work for organisations with a child safeguarding policy and code of conduct need to follow that code within and outside the workplace. This means adopting an appropriate behaviour themselves and reporting concerns they have about a child whether **in or outside work**. This can often be seen challenging for staff but it is important to understand that the organisation is creating an environment that contributes to keeping all children safe.

> ***"Where concerns are raised by staff and volunteers about other staff, volunteers and partners, even if these are not substantiated, providing there was no malicious intent, no punitive action will be taken against the person raising the concern or making the report. A Whistle Blowing Policy ensures that reports can be raised safely and applies when reporting child protection incidents or concerns about the implementation of the Safeguarding Policy."***
>
> Terre des hommes SP

To reduce the risk of harm by staff, volunteers, associates, the organisation must make it clear through a code of conduct, HR recruitment procedures, training and internal communications that child abuse will not be tolerated. It is a reputational benefit for the organisations to **declare zero tolerance** to the staff, partners and associates but also to the community. In addition, there is a **benefit at HR level**: to train staff members and to make them committed toward the values of the organisation. By implementing a safeguarding policy, the trained staff learns how they are expected to behave with children and what they need to do if there are concerns about the safety of a child.

Beyond training and raising awareness about safeguarding in general, the partner organisation should name a **focal point** (an appropriate designated person) to receive and manage any safeguarding concerns and subsequent inquiry or investigation. The focal point is responsible for making sure that the child safeguarding measures are integrated throughout the organisation. This role should reflect the nature and structure of the organisation and the person should be senior enough, and have enough support and resources, to carry out the role. At each **appropriate level** or setting there should be a named person or persons who people can talk to about child safeguarding matters. It is good practice to identify the designated person at the earliest possible point of the policy development process thus everyone knows how to contact him/her.

In larger organisations there should be a structure identifying a number of designated people across the different regions and activities. It is up to the organisational needs to add this role as an extra to one of the staff members or develop a new job for this role. However, the designated person should not normally be a head of service or have sole responsibility for the management of child safeguarding for an organisation. It is always better to ensure there are other **lines of accountability** and responsible people so there is not one reporting route only. The role should be shared or supported by several people and there should be arrangements in place to cover for absences.

See below an illustration from the Safeguarding Policy of *Terre des hommes* about the roles and responsibilities of the focal point:

Roles and Responsibilities of the Child Safeguarding Focal Point

To support the country operations with the day implementation of the Child Safeguarding Policy - with the technical support of the Regional Child Protection Advisor based in Lausanne

Specific duties include:		
To act as the main point of contact within the delegation for child safeguarding;	To ensure that staff and partners are aware of the Child Safeguarding Policy and their responsibilities under it (for example by providing training and guidance);	To advise and support staff and partners with the implementation of the safeguarding policy - including risk assessments;
Establish links with local specialist child welfare, health and law enforcement contacts in order to have information available if an incident occours and/or external advice is needed;	Ensure that safeguarding policy and our commitment to children's rights is made known to children, families and communities who work with Terre des hommes, and that policy is accessible;	Ensure that name and contact details of the Child Safeguarding Focal Point are made available so that people know how to raise a concern/where to seek advice;
To act as first point of contact for concerns regarding child protection incidents and to raise those concerns to the Senior Manager/Regional Child Protection Advisor as appropriate;	Keep an accurate record of any incidents;	To support the implentmentation and monitoring of the Child Safeguarding Policy by providing an annual progress report to the Risk Management Advisor in Lausanne (as requested) together with a plan for further action required to implement the Child Safeguarding Policy at local level.

Developing a safeguarding policy is a beautiful job in most of the cases but everyone makes mistakes, even safeguarding policy advisors, counselors and facilitators. This Compendium is intended to help **prevent** some of the irmost common ones with raising awareness. In addition, proper screening, contracting and auditing play roles also in prevention. Still, there are some potential mistake and pitfall stemming from the optimistic assumptions of the CS advisor, CS counselor, CS facilitator, like

1. The supporting professional works harder to develop the safeguarding policy than the partner organisation. Though, the facilitator's job is 'only' to encourage the staff, and to support the procedure (with knowledge, information and sometimes with belief).
2. The supporting professional follows a safeguarding policy form/model strictly regardless the real needs of the organisation. Being flexible, open-minded and aware of changing directions if necessary are essential skills for a CS advisor/ CS counselor/ CS facilitator.
3. Supporting a safeguarding policy development often requires courage. Risk assessment is not easy because it means facing the problems, challenges, weaknesses. The supporting professional has to be committed to say out loud what needs to be said and encourage the staff to step out of their shadow.
4. Owning the policy making procedure or the outcome is a typical mistake. The partner organisation owns all the credits for this procedure and the CS advisor/ CS counselor/ CS facilitator did the best job if the organisation says, "the supporting person was pretty good, but we really did most of the important stuff by ourselves."
5. Last but not least, a common mistake of the policy development process is if the CS counselor or CS facilitator focuses only on the policy. Working with a team means influencing people, having insights and actions, making changes. Having a safeguarding policy is not the only achievement here.

The CS advisor/ CS counselor/ CS facilitator supports the policy development process not just with his/her knowledge and information but also with skills and attitudes. Safeguarding policy is against violence thus only non-violent ways of communication and peaceful ways of conflict resolution are permitted during the process. While supporting safeguarding policy development in general, it is also important how professionals work. One has to give both positive and negative feedback to the partner organisation in a collaborative way, with empathy and recognition of the needs and interests of the staff. The CS counselor and CS facilitator should also do more listening than talking.

Special Concern - Meaningful Ways of Child Participation During Policy Development

It is strongly recommended to involve children into the safeguarding development process based on a particular plan developed during the auditing. Fundamentally, child participation processes have to be in line with the ethical principles set out in General Comment No. 12 (2009). Since child participation needs special knowledge and experience, CS counselors and CS facilitators usually involve special experts to ensure a meaningful way of child participation in the whole process. Here the main principles are:

- The transparency of decision-making shall be ensured so that children may participate to the best of their capacities. Initiatives by children should be given an increased priority.
- Child volunteers should be granted the opportunity to freely express their opinion in all circumstances. The opinion of children shall be respected.
- All steps shall be taken to create and maintain a safe and comfortable environment for children.
- The participation of children cannot violate their right to education and the right to leisure and free-time.

Special Concern - Emergency Situations

2020 taught us to be prepared for emergency situations. When a country is hit by a disaster, its usual structure may be severely affected and the services which once used to be utilised to address child safety concerns may not operate anymore. It is therefore extremely important for the organisations to carry out a mapping exercise in order to provide an analysis of the child safeguarding risks.

The mapping process must include an analysis of the relevant legal environment (like regulations during COVID pandemic), the service providers available and suitable for children (incl. health, social, etc.), existing community infrastructure and identifying the safeguarding risks children may face in the particular context.

The process will help to identify child safeguarding concerns, responsible organisations and authorities as well as suitable service providers where children may be referred to if necessary. In many cases it will be helpful to make contact with key agencies and individuals to make sure there is an effective, coordinated and child-friendly response.

The development phase of policy development is completed if:

a.
Focal point and/or the focal team is appointed and prepared;

b.
Regular meetings, calls with the focal point, team happened;

c.
Minutes/reports of meetings about policy development are available;

d.
Draft and revised versions of safeguarding policy is prepared;

e.
Final version of the safeguarding policy is published.

4. Implementation

A policy to ensure the safeguarding of children has no impact if it is not put into practice. The policy is the foundation of the safeguarding measures – it communicates the position of the organisation in regard to keeping children safe and provides details on how the partner organisation intends to make it happen. Clear procedures and guidance will need to be developed and followed strictly to ensure prompt responses whenever concerns about a child's safety or welfare are raised.

It is also important that the partner organisation ensures that key staff members as well as children are properly **involved** in the implementation and provides information to them for proper tailoring. For instance, for a new policy to be effective, it is important that people tasked with carrying out the policy are actually able (and willing) to do so. There are many possible "right" ways to implement a new policy and actually **introduce** it to the staff members, associates and partners. The best way depends on the size and policy making culture of the organisation.

It is strongly recommended for the CS facilitators to involve key stakeholders (not just focal points) in the policy development process before implementation. Get feedback from program leaders and from staff members who would be subject to the safeguarding policy. Pay attention to what these people have to say and make modifications in the policy as appropriate (or as necessary). Regardless of which way or method the CS facilitator chooses, it can be helpful

to provide relevant background to the staff, volunteers, associates and partners explaining what the reasons behind the policy are. The staff who understands what, why and how of the safeguarding policy are much more likely to comply with it.

Education and training are very powerful ways to improve practice. It is essential that all those employed or engaged by the organisation have access to regular training on child safeguarding that is appropriate for their role and responsibilities, beginning at the induction/orientation stage.

Good preparation and thoughtful policy development are the key for successful implementation. When the CS advisor/ CS consultant/ CS facilitator could take attention to the details at every stage of the procedure, there will be no serious problems with implementation at the end of the procedure. Good implementation is a consequence not an independent task.

Special Concern - How to Introduce the Safeguarding Policy
First of all, introducing the policy is an integrated part of the implementation process and starts with the involvement of the staff. CS advisors and CS counselors rarely deal with policy introductions while CS facilitators usually play an important role in this activity.

Optional ways of safeguarding policy introduction can be:

- In-person sessions run by the trained focal point (option for small organisations), or
- In two stages: (1) formal introduction by the organisation leader and the focal point in a dedicated event, (2) training (option for organisations with 15-30 staff members, volunteers, associates), or
- At first, rolling out the policy via e-mail and then in-person training (option for organisations with more than 30 staff members), or
- Foreshadow the coming policy, giving the staff advanced notice that some changes will be introduced and then, training (option if the involvement of the staff was limited during policy development), or
- Disseminate the policy at first, and then provide group session(s) to collect questions - after that, training (option for organisations up to 30 staff members, volunteers, associates),
- Any other alternative way according to the needs of the partner organisation.

Beyond the introduction, the policy should be made available to all staff, volunteers, associates, partners, beneficiaries, children, families and the community. Publishing the policy may include presenting posters in open spaces, ensuring a copy is available for everyone, alternating the language of the policy based on the needs of the beneficiaries of the partner organisation, developing child-friendly language versions of the policy and promoting the policy in the community.

Example:
In 2019 a Hungarian foundation faced a special challenge while implementing the SP. The foundation ran after school activities for children living in foster care. The activities were provided by approx. a hundred volunteers and the fluctuation among volunteers was relatively high (20% per year). Thus, the foundation needed a special way to introduce the policy for the new volunteers. The solution was to develop an online training platform and an e-learning material about the safeguarding policy. This way, the new volunteers could learn the details of the policy at the very moment they were recruited and they could also refresh their knowledge anytime it was needed.

Special Concern - How to Develop Child-friendly Language Materials

Implementation should be a smooth process at the end of a satisfying policy development procedure. However, designing a child-friendly version is always challenging as well as creating easily understandable, short versions of SP for the public.

In the 21st century, designing also means that sometimes it is better to create a short, animated video than printing out posters or leaflets. Where reaching out to children and other beneficiaries is crucial, it is always recommended to contact an expert.

Fundamental principles of developing a child-friendly material:

Visualize a child	Imagine for example a 12 year old child whom you know personally. What is he/she like? What does he/she know about your topic? Imagine a personal discussion with him/her. What would he/she be interested in? What would you say to him/her about the topic concerned? How would you explain it? Whenever you continue working on your paper, always start with the clearest possible vision of an exact child.
Talk to children	Tell about your work to a teenager in your family or circle of friends and learn more about their related interests or concerns and practice formulating your messages to your target audience. If you have capacities (human, financial, professional), consider involving children in developing the material at any level (consultation or collaboration).
Consult others	If you have not met anyone from your target group for a long time, talk to others who can help you bring you closer to their experiences, or preferably get involved in developing the material.
Get informed about the relevant issues and trends	Familiarize yourself with the world of a teenager/child. Take a look at the Instagram profile of an influencer, read about their habits to get information (online and offline), and of course, read the conclusions or recommendations of relevant research on what children need to feel more comfortable during a procedure.
Stay relevant	Put children's questions first. Learning about your audience helps put yourself in children's shoes and find real answers to the real questions. Restrict yourself to the information that is truly necessary and interesting for your target group. Be honest with yourself: are the numbers of articles, laws, exact dates, historical backgrounds, etc. really matter?

The implementation phase of policy development is completed if there are:

- Copies of training plan, attendance records and training evaluations;
- Copies of information for children about procedures and sources of support (available also online);
- Partnership agreements and agreement forms;
- Reporting forms;
- Parental Consent Form;
- Risk Assessment Template for Activities/Projects;
- Code of conduct;
- Guideline on reporting for staff, partners, children and community.

5. Evaluation and Monitoring

Monitoring and evaluation is **inseparable** from policy implementation. The lessons learnt have to be reported to **key stakeholders** of the partner organisation and/or **external auditors** to provide an opportunity to make changes in procedures or the policy standards.

The way of evaluation depends on the size, structure, culture of the partner organisation but it has to mean **regular follow-up**.

There are two main ways of monitoring and SP should refer to both of them: **proactive** monitoring and reactive monitoring. Proactive monitoring tools are usually the surveys, semi-structured interviews provided by the HR department, and regular team discussions to ensure that the safeguarding policy is working. For the organisations, to **collaborate** and work with other organisations who can support safeguarding related efforts can be a good way of proactive monitoring. It is easier to do child safeguarding together with others.

Reactive monitoring has to happen when the organisation failed the safeguarding policy or any department/staff member made a mistake. Reactive monitoring also includes case study and risk assessment.

The CS facilitator's contract should include the role (s)he plays in the evaluation and for how long.

Example:
A global NGO with more than three hundred staff members implemented a safeguarding policy in 2016. The NGO and the facilitator had a three year commitment. Their contract included one year CS facilitation, and then two years of monitoring/evaluation. The facilitator played an active role in mentoring the NGO staff on safeguarding issues in the contracting years. Mentoring was part of proactive monitoring in this case.

The evaluation and monitoring phase of policy development is completed if:

- Copy of monitoring tools (both proactive and reactive tools are implemented) are available;
- Frequency of the monitoring is decided and approved by the head of the organisation;
- Internal audit reports are issued and/or external audit expert contracted;
- Certification of monitoring/evaluation is published (if applicable).

Figure 4: The process of child safeguarding development and implementation from the point of view of CS advisors/ CS counselors/ CS facilitators

Annex

General Information
List of links and websites with good practice and for further information

- Read me - Information package (ECPAT, 2020)
- Child Safeguarding Policy (good example)

  Child Safeguarding Policy (Terre des hommes, 2015) https://www.tdh.ch/sites/default/files/955ede1a-c959-4e91-914e-5aa7fb944b28_r_pse_d_pol_en_original_0.pdf

  Safeguarding children in Emergencies (Save the Children, 2012) https://resourcecentre.savethechildren.net/node/6822/pdf/6822.pdf
- Child Safeguarding Policy Implementation (good example)

  Child Safeguarding Standards and how to implement them (KCS, 2014) https://ec.europa.eu/info/sites/info/files/standards_child_protection_kcsc_en_1.pdf

  Understanding Child Safeguarding - a facilitator's guide (KCS, 2014) https://resourcecentre.savethechildren.net/node/8560/pdf/kcs_understanding_2014.pdf
- Child-friendly safeguarding materials (good examples)

  Child Safeguarding in child-friendly language (HA, 2020) https://hintalovon.hu/wp-content/uploads/2020/10/gyb-iranyelv_gyerek-onkenteseknek_EN.pdf

  Child Safeguarding standards in child-friendly language (HA, 2020) https://hintalovon.hu/wp-content/uploads/2020/10/gyb-iranyelv_alt.-infok_EN.pdf

Guidance for Occasional Volunteers and Visitors (Good Example)

Core mission of the organisation in one paragraph:

Protecting children is the duty of every colleague, volunteer, supporter, participant, advisor and visitor.

According to Article 19 of the UN Convention on the Rights of the Child, State Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse. The (organisation's) Child Safeguarding Policy is based on this principle, and therefore every volunteer and visitor shall accept them.

We would like our volunteers and occasional visitors to get access to our projects and help our work, obeying the following rules.

Ethical norms on production and exploitation of pictures, audio and video recordings:

- *Production of pictures, audio and video recordings exclusively in relation to the Foundation's projects.*
- *One shall always ask for permission before taking a picture or an audio or video recording.*
- *Please ensure that you do not jeopardise the child, his/her family or environment by disseminating the picture!*
- *Communicate (to the child) that you are producing the picture, video or audio recording as the employee of the (organisation).*
- *Do not release pictures of naked or not properly dressed children. These pictures shall never in any case be used!*
- *Respect of the child's dignity is of utmost importance and shall be taken into account when using a picture, an audio or video recording.*
- *Only officially endorsed pictures and video recordings can be shared on social media platforms.*
- *The child's personal data (full name, address, or any other information likely to identify the child) shall not be indicated on the picture, audio or video recording.*

The volunteer shall refrain from any conduct that harms the *(organisation's)* objectives and legitimate interests.

I, the undersigned, declare that:

- *I will never act inappropriately, or in a way that prejudices the child's interests.*
- *I will never act in an offensive or sexually provocative way towards the child. (ex. hug, kiss)*
- *I declare zero tolerance on any form of violence or maltreatment against children.*
- *I do not discriminate against the child.*
- *I do not trespass professional limits.*
- *I do not take the child anywhere without the legal representative's consent unless this is strictly necessary for the protection of the child.*
- *I will not be under alcohol and/or drug influence while working with children. I do not handle the child as a victim.*
- *I will not hide any unlawful fact that I became aware of.*

I, ... the undersigned have understood and accepted the *(organisation's)* present Policy. Being fully aware of my criminal liability, I hereby declare that I was not charged with child abuse or sexual harassment and no examination was conducted against me in such cases. I do hereby declare that I am under no prohibition by final judgement to exercise professional activity and I was never convicted by a final judgement for committing a crime. I declare that the information provided to *(the organisation)* is truthful.

Date, signature

Risk Assessment Chart (Good Example)

Identifying/evaluating risks

Your Organisation
Type of Work
Location Operations

Risk Areas					
Staff	**Partners**	**Associates**	**Services**	**Information and Communication Technology (ICT)**	**Income Generation**
Potential Risks					
1. How do you recruit staff? **2.** Do you make proper reference and poclice checks on staff? **3.** What level and type of contact and interaction do staff have with children in your organisation? **4.** Is there a high turnover of staff? **5.** Do you have temporary or volunteer staff? **6.** Do all staff have briefings/ induction training on child safeguarding?	**1.** What is your partner's impact upon or contact with children? **2.** Where are partners located? **3.** What risks does their organisation present for children? **4.** Do they have their own policy or are they working to yours?	**1.** Whose are your associates and what level and type of contact or interaction do they have with children (e.g. consultants, contractors, service providers)? **2.** How are they engaged by your organisation?	**1.** What services do you provide that target children and famililes? **2.** How have those services been designed? **3.** What consideration has there been for children accesssing the services? **4.** Have you considered the needs of different children - boy/girls? **5.** Who delivers those services?	**1.** What images and information on children does you organisation use? **2.** How is this information stored and presented to whom? **3.** What ICT does your organsiation employ, for whom? **4.** How is the use of that ICT governed? **5.** Do you allow staff to refer to the organisation in their presonal social media?	**1.** How do you raise funds or generate income? **2.** Are children involved in some way?