

Child Protection Policy

Introduction

Every child is potentially at risk of abuse and exploitation. Family for Every Child recognises that the children with whom and for whom we work are particularly vulnerable to abuse and exploitation due to discrimination and marginalisation relating to their disability, socioeconomic status, gender, ethnicity, caste or living situation. Abuse can be perpetrated on a child of any age, and can happen to and between children. Perpetrators can be women and men, boys and girls.

The Child Protection Policy sets out our common belief and principles and describes the steps that will be taken by Family for Every Child to protect children involved in our activities. All Members of the alliance commit to the Child Protection Policy, and will be guided by this when undertaking activities on behalf of the network.

In developing this policy we have drawn upon ECPAT's Child Protection Policy, Keeping Children Safe Coalition Toolkit and referred to the work of other international organizations working within the child protection sector. Family for Every Child recognises the International Standards for Child Protection which provide a benchmark for agencies and organisations working with children.

Our Belief

Family for Every Child and its members believe that every child has a right to live free from abuse and exploitation.

We uphold the rights of children as defined in the United Nations Convention on the Rights of the Child (UNCRC)¹ and believe that all children have a right to protection:

'...from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s), or any other person who has the care of the child.'

Everybody has the responsibility to protect children from all forms of abuse, abandonment, neglect, exploitation, violence and discrimination.

Our Approach

Family for Every Child has adopted policies² and procedures to ensure that all of its staff, representatives and members, are knowledgeable about child protection risks and aware of the specific measures that they must take in order to protect children in the work that they do on behalf of the alliance.

Family for Every Child in general does not provide direct services to children. We support and endorse members' organisational child protection policies which are appropriate to the specific country context in which they operate and the vulnerable groups of children which they serve. The quality of prospective members' Child Protection Policies is assessed as part of the membership application process and will be reviewed on a regular basis.

¹ UNCRC 1989

² Child Protection Policy; Visual Images Policy, Standards for Consultation and Research, Participation Policy, and Guidelines on Engaging Children and Youths in Advocacy

Family for Every Child's child protection policies and procedures are in line with the UNCRC definition of a child as being anyone under the age of 18 years unless under the law applicable to the child, majority is attained earlier. Family for Every Child acts in accordance with the UNCRC; our decisions and actions in response to child protection concerns will be guided by placing the 'best interest of the child' at the forefront and the principle of do no harm.

It is not Family for Every Child's role to determine whether a child has been abused but to refer concerns of abuse to the relevant authorities in the country where the incident has been reported.

All information relating to child protection concerns will be treated as confidential. No retaliation or punitive action will be taken against anyone who, in good faith, raises a child protection concern (please see Family for Every Child's Whistle Blowing Policy).

The child protection policies and procedures have been endorsed by the Board of Trustees and clarify the organisations stance on and commitment to protecting children.

The policies and procedures will be available on our website and shared with other organisations or individuals Family for Every Child works with or anyone requesting a copy. We aim to continuously improve our policies and procedures and ensure that staff have access to adequate training and resources.

Our Commitment

Members of Family for Every Child have a common commitment to protect all children from abuse and exploitation and taking the necessary actions when children are in such situations. The abuse of children happens in all countries and in all societies across the world.

Our principles

- All children have equal rights to protection from abuse and exploitation
- Child abuse is never acceptable
- We all have a commitment and responsibility to support the care and protection of children with whom and for whom we work
- We listen to and act on the views and opinions of children
- We address all reports of actual or alleged abuse based on our policies and procedures, irrespective of the nature of the referral, who the allegations are about or who the referrer is or where s/he is from
- We treat as confidential all information relating to a child protection concern
- All of our actions and decisions will be guided by the 'best interests of the child' and the principle of do no harm
- All child abuse involves the abuse of children's rights

Our Standards³

³ Keeping Children Safe 2012

- We will implement all reasonable measures to ensure that the risks of harm to children's welfare are minimised
- We will ensure where there are concerns about children and young people's welfare, appropriate actions are taken to address those concerns,
- We will work to agreed local policies and procedures in full partnership with other local agencies
- We will ensure all staff and members are aware of their responsibilities to protect children and able to recognise risk factors.
- We will ensure that child protection forms an integral part of all stages of the activities we undertake as a network

Scope

The Child Protection Policies and Procedures apply to all 'staff' deemed in its broadest sense as employees, volunteers, interns, board members and other representatives of the organisation such as consultants, journalists and photographers commissioned on behalf of Family for Every Child who may come into contact with children or data concerning children.

When referencing 'activities' this encompasses all activities undertaken on behalf of Family for Every Child by both its members and its staff. Family for Every Child in general does not provide direct services to children.

All members of the network will sign and commit to the Child Protection Policy, Visual Images Policy, Code of Conduct, and will be guided by these documents and the Standards for Consultation and Research when undertaking activities on behalf of the network.

The responsibility for managing and reviewing this policy in relation to the work of the Secretariat lies with the CEO of Family for Every Child and the designated Child Protection Officer. The responsibility for managing and reviewing this policy in relation to activities undertaken by members on behalf of the alliance lies with both the CEO and members.

The policies and procedures shall apply equally to all staff and members carrying out work on behalf of Family for Every Child, irrespective of location or activity.

This policy deals with the protection of children as defined under the UNCRC. Family for Every Child's actions will always be in the best interest of the child.

Our understanding of child abuse includes⁴:

Physical abuse of a child is the actual or potential physical harm from an interaction or lack of interaction, which is reasonably within the control of a parent or person in a position of responsibility, power, or trust. There may be single or repeated incidents (WHO, 1999).

Sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violate the laws or social

⁴ These sub-categories of child maltreatment and their definitions were devised following an extensive review of different countries' definitions of child maltreatment and a 1999 WHO consultation on child abuse prevention.

taboos of society. Child sexual abuse is evidenced by an activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to, the inducement or coercion of a child to engage in any unlawful sexual activity; the exploitative use of a child in prostitution or other unlawful sexual practices; the exploitative use of children in pornographic performances, internet pictures and materials (WHO, 1999). The recent use of technology such as the internet by adults, to entice children to meet or participate in virtual sex, is also an abuse.

Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure, so that the child can reach their full potential in the context of the society in which the child lives. There may also be acts toward the child that cause, or have a high probability of causing, harm to the child's health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power. Acts include restriction of movement, degrading, humiliating, scapegoating, threatening, scaring, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment.

Neglect and negligent treatment is the inattention or omission by the caregiver, to provide for the development of the child in: health, education, emotional development, nutrition, shelter and safe living conditions, in the context of resources reasonably available to the family or caretakers. In addition which causes, or has a high probability of causing, harm to the child's health or physical, mental, spiritual, moral or social development. This includes the failure to properly supervise and protect children from harm, as much as is feasible (WHO, 1999).

Sexual and commercial exploitation- Sexual exploitation is the abuse of a position of vulnerability, differential power, or trust for sexual purposes; this includes profiting monetarily, socially or politically from the exploitation of another (for example child prostitution and trafficking of children for sexual abuse and exploitation). Commercial or other exploitation of a child refers to the use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labour. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development (WHO, 1999).

Abuse of children in armed conflict- Children are affected by armed conflict in many different ways; the United Nations Security Council has identified six categories of violations: killing or maiming of children; recruitment or use of children as child soldiers; sexual violence against children; attacks against schools or hospitals; denial of humanitarian access for children; and abduction of children. Children associated with the armed groups and armed forces are defined as any person under 18 years of age who is part of any kind of regular or irregular armed force of armed group in any capacity including, but not limited to, cooks, porters, messengers and those

accompanying such groups, other than as purely family members. . It includes girls recruited for sexual purposes and forced marriage.⁵

A person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused within a family or in an institution or within their own community, by a person known to them or, more rarely, by someone they don't know.

Prevention

Risk Assessments

When activities which directly interact with children are carried out in Family for Every Child's name then a child protection risk analysis is carried out and relevant child protection procedures put in place compliant with this policy and the Standards on Consultation and Research to ensure that the risks of harm to children's welfare are minimised. If a member is conducting these activities then the procedures will also build on their own Child Protection Policy. If a member's Child Protection Policy is not as robust as Family for Every Child's Child Protection Policy then the latter takes precedence.

Recruitment and Employment

- The job advert should make reference to Family for Every Child's child protection policy and screening process.
- All job interviews will specifically contain a question relating to the candidate's previous history and suitability of working for a child rights organisation.
- All appointments shall be subject to two satisfactory references from previous employers. Where a candidate has previously worked for a children's organisation a reference will be specifically requested from this organisation.
- Verification conducted that references provided are genuine and explicitly request that referees confirm they have had no child protection concerns relating to the candidate in question.
- Verification conducted of unexplained gaps in employment history through checking and verifying additional references to eliminate possibility of previous dismissal and/or periods in custody as a result of suspicious activity.
- All staff will be required to provide a police clearance certificate, to undergo a police check for criminal convictions and sign a declaration (Annex 1) that they have no criminal convictions relating to offences against children.⁶
- All staff must sign the Child Protection Policy and Code of Conduct before commencing work for Family for Every Child

Training and Awareness

⁵ Adopted at the Symposium on the Prevention of Recruitment of Children into the Armed Forces and Demobilization and Social Reintegration of Child Soldiers in Africa, organized by UNICEF in cooperation with the NGO Sub-group of the NGO Working Group on the Convention on the Rights of the Child, Cape Town, 30 April 1997

⁶ For consultants contracted by Family for Every Child who will not have direct access to children or any sensitive data relating to children member's work with, signing a declaration would be sufficient.

- Child Protection Training, including awareness raising and reporting systems, will be provided to staff on an annual basis
- All new staff will be given an introduction to the Child Protection policies and procedures as part of their job orientation. This should take place within three months of starting employment
- All new members of the alliance will receive a briefing on Family for Every Child's child protection policies and procedures and will have electronic access to the documents.

External Visitors to member organisations and projects – donors, media and other NGOs

- External visitors must be briefed prior to or immediately on arrival and sign the Family for Every Child and the relevant members' child protection policy, Code of Conduct and Visual Images Policy
- All external visitors must be accompanied at all times by staff from Family for Every Child or the member organisation.
- No children who have participated in Family supported projects should be put in direct contact with the media or donors.

Visits to a member by Secretariat staff, board members, consultants, photographers and other members

- All internal visitors must be briefed prior to or immediately on arrival and sign the Member's Child Protection Policy, Code of Conduct and Visual Images Policy
- All internal visitors must be accompanied at all times by staff from the member organisation.

Visual Images and written content

Family for Every Child has a duty of care to the children who feature in all visual and written material and at all times must put their interests first. Any portrayal of children and their experiences must protect their identity, preserve their dignity and be accurate, balanced and fair. Any visual or written material will be gathered in accordance with the Visual Images Policy. A brief summary of the policy:

- Fully informed verbal consent (in their first language) must be obtained from parents/guardians or carers and the children before taking and using photographs, film footage, audio recordings or personal histories.
- The visual identity of any child will be obscured if dissemination of the image could make the child vulnerable to stigma, discrimination, abuse, violence or exploitation.
- Visual images or written material will not enable the specific location of a child to be identified - either from the imagery or accompanying captions/text.
- Portrayals of children should be accurate and balanced, with emphasis upon their dignity
- All content and data (names, photos, case studies) will be stored securely, and access will be restricted only to individuals who need it.

Ramifications of Misconduct

- Any child protection concerns relating to inappropriate conduct of Family for Every Child staff and volunteers will be dealt with under the Family for Every Child HR policies and disciplinary procedures.
- Any child protection concerns relating to inappropriate conduct of a Family for Every Child consultant will result in immediate suspension of the contract whilst an investigation into the claim is undertaken.
- Failure to act upon any child protection concern (reported or suspected) in relation to a third party will also be deemed to be professional misconduct that constitutes a failure on the part of Family for Every Child to protect children from real, potential or suspected harm. Any staff member or consultant who is found to be concealing information brought to their attention in relation to child protection will be subject to disciplinary procedures.

Reporting and Responding

Reporting Mechanism for Concerns and Referrals

The designated Child Protection Officer is the first point of contact for reporting and referring concerns about child protection issues and also a resource for staff and members to share concerns and discuss appropriate actions. The Officer reports to the CEO of Family who is responsible for the implementation of the policies and procedures.

See Annex 2 Child Protection Referral Form

- Staff and members will be informed of and have access to a designated Child Protection Officer (CPO) within the Secretariat. This person will be accessible to discuss concerns and dilemmas related to child protection and to receive any child protection related referrals.
- Staff and members have a responsibility to notify, without any delay, the CPO of any concerns that they may have about the safety and well being of any child or the worrying behaviour of any adult, irrespective of how they know the adult.
- Staff and members have a responsibility to notify the CPO of any concerns regarding the behaviour of colleagues
- No retaliation or punitive action will be taken against anyone who, in good faith, raises a child protection concern.
- All information in relation to child protection concerns will be kept confidential. Any information shared will be done so on a 'need to know' basis and with the knowledge of those concerned.
- Any records related to child protection referrals and concerns will be kept in a central location, with access to this strictly limited. If action is taken against a member of staff then a note of this will be made on their confidential personnel file, and will be disclosed by the CEO if a reference is sought.
- Where judged necessary, in line with the reporting matrix, appropriate referrals will be made to the relevant member in the country where the concern has been raised. The concern will then be investigated in line with the member's child protection policy and a referral made to the most relevant protection and investigating agency if

appropriate. A report will be shared with the Secretariat within one month of the referral.

- Where judged necessary, in line with the reporting matrix, in countries where no member is present a referral will be made to the most relevant protection and investigating agency if appropriate. Permission will be sought from the source of the information before passing on their contact details. Details will not be passed on if it is detrimental to the interest of the child.
- Once a concern has been reported it will be the responsibility of the CPO and CEO to determine an appropriate response.

Disclosures from children

Family for Every Child will ensure that it will handle disclosures from children with sensitivity and will take alleged abuse seriously. If a child or young person informs you that they are being or have been abused, you are advised to:

- Listen to the information being shared, but don't press for further information
- Ask open questions, and only enough questions to give you an idea of the facts? E.g. "Can you tell me what happened?", "Is there anything else you want to tell me"
- Reassure the child or young person that they have done the right thing by telling you.
- Let them know that you will need to pass on the information to another person, what you will do next and that you will let them know what happens
- Do not conduct any investigations or question the alleged abuser
- Assess whether there is an immediate risk to the child or young person over the next day or two. Take steps to mitigate these risks, seek advice from the CPO
- Complete a Referral Form and pass this onto the CPO immediately.

Monitoring and Review

Implementation of the policy will be monitored in accordance with the organisation's monitoring and evaluation framework.

Child Protection policies and procedures will be reviewed every two years by the Board or appropriate Board Committee.

Complaints

The Child Protection policies have been put in place to ensure that Family for Every Child is not supporting activities or employing staff who put children at risk of abuse. In the event of a complaint received, this will be addressed in line with Family for Every Child's Complaints Policy.

Family for Every Child Child Protection Code of Conduct

As child rights organisations Family for Every Child and its members have a moral and legal obligation to ensure that the children with whom we work or have an impact upon are safe. We are committed as an alliance to upholding the highest standards of behaviours in and outside of the work environment.

The Code of Conduct serves to protect the reputation of Family for Every Child, its members and the people who work within, or on behalf of, the alliance.

All staff and members of Family for Every Child who are in contact with children **MUST NEVER:**

- discriminate, prejudice or display oppressive behaviour or language in relation to: race, culture, age, gender, disability, religion, sexuality or political views;
- spend time alone with children away from others;
- develop physical/sexual/exploitative relationships with children under 18 years of age, regardless of local laws;
- develop relationships with children under 18 years of age, which could in any way be deemed abusive or exploitative, regardless of local laws;
- hold, kiss, hug or touch children in an inappropriate, sexually provocative or culturally insensitive manner;
- do things of a personal nature which the child can do themselves such as toileting, bathing and dressing;
- use language, make suggestions or offer advice which is inappropriate, offensive or abusive;
- act in ways intended to shame, humiliate, belittle or degrade;
- condone or participate in behaviour which is illegal, unsafe or abusive;
- behave in a manner which is abusive, exploitative, inappropriate or sexually provocative;
- or seek to deliberately or intentionally support or develop any initiatives which contravene the rights of children as laid out in the UN Convention of the Rights of the Child.

Non-compliance with the code above will be taken seriously. In accordance with the Child Protection Policy immediate reporting and investigation of all concerns and suspicions is mandatory and will include referral of cases to the police and/or social services if child rights laws have been violated.

Annex 1

Family for Every Child Self Disclosure Form

All staff and representatives connected with Family for Every Child, and who will come into contact with children or their personal details, must complete and sign this declaration. This information will be held confidentially and stored in a secure location.

1. Have you ever been convicted of any criminal offence? Please include cautions and bind-overs as well as convictions.

Yes No Don't know

2. Have you ever been the subject of a disciplinary hearing by any professional body?

Yes No Don't know

3. Have you ever been the subject of any allegation, concern or disciplinary process in relation to your contact or care of children by any official body?

Yes No Don't know

4. Have you ever been dismissed or been asked to leave employment or voluntary activity due to allegations of inappropriate behaviour towards a child?

Yes No Don't know

5. Have you ever been disqualified from working with children or young people?

Yes No Don't know

If you have answered 'yes' or "don't know" to any of these questions please include a statement setting out the details and context of the situation in a separate envelope addressed to the relevant member of staff undertaking your recruitment.

This declaration must be signed and returned to the designated Manager prior to commencing any direct work with children and young people.

I confirm that the above information given by me is correct and that I consent to my personal data being processed and kept for the purpose of safeguarding and promoting the welfare of children and young people in accordance with the UK Data Protection Act 1998⁷.

Name

Signature

Date

⁷ The UK Data Protection Act-principles include that all individuals' personal data should only be obtained and held on the organisation's computerised or manual systems when it is necessary for business purposes. Where such information is required, it will be stored accurately and securely, to prevent unauthorised access.

Annex 2

Child Protection Referral Form- Internal

For use by staff, members, and representatives of Family for Every Child.

All information will be treated as confidential and stored in a secure location. Please complete this form providing as much information as possible and send it to the CPO.

About You

Your name, position, organisation and email address:

If You Are Reporting a Disclosure from a Child

Name of the Child:

Sex and age:

Who does the child live with?

Address /place of residence (and telephone if available):

Are you reporting your own concern or passing on those of others, give details:

Brief description of what has prompted those concerns (date, location, time of specific incidences):

Observations made by you (physical, behavioural or indirect):

Have you spoken to the child? If so what was said (if possible, use the direct language of the child)?

Has anyone been alleged to be the abuser? If so give details:

Have you consulted a government department or any other agency, or reported this to anyone else? (Give details, name, organisation, date, time):

Does the Child require any medical attention?

If You Are Reporting a Concern Regarding a Representative of Family for Every Child

Name of the individual, position, and organisation:

Are you reporting your own concern or passing on those of others, give details:

Brief description of what has prompted those concerns (date, location, time of specific incidences):

Observations made by you (physical, behavioural or indirect):

Name

Signature

Date

Child Protection Referral Form- External

For referrals from individuals/organisations who are not formally connected with Family for Every Child

All information will be treated as confidential and stored in a secure location. Please complete this form providing as much information as possible and return it to info@familyforeverychild.org.

About You

Your name and email address:

Relationship to Family for Every Child:

About the Child

Name of the child:

Sex and age:

Who does the child live with?

Address /place of residence (and telephone if available):

About Your Concern

Are you reporting your own concern or passing on those of others, give details:

Brief description of what has prompted those concerns (date, location, time of specific incidences):

Observations made by you (physical, behavioural or indirect):

Have you spoken to the child? If so what was said (if possible, use the direct language of the child)?

Has anyone been alleged to be the abuser? If so give details:

Have you consulted a government department or any other agency, or reported this to anyone else? (Give details, name, organisation, date, time):

Does the child require any medical attention?

Name

Signature

Date

Annex 3

Reporting Matrix

The matrix outlines who the first point of contact is for reporting and decision making for any child protection concerns, and the subsequent steps to be taken and the timeframe with which actions should take place. Members must comply with their organisational child protection policies and reporting procedures when concerns are raised about any of its staff, representatives, partners or communities with which it works whilst simultaneous also reporting the concern to the Family for Every Child CPO or CEO if the concern relates to a project or activities supported by Family for Every Child.

Nature of concern/referral	First point of reporting and decision making	Subsequent Action Required	Information shared	Timeframe
Tier 1 General Enquiry	First Contacted Staff – consult Transparency Policy	Letter/email in response to general enquiry If general response not appropriate consult Child Protection Officer (CPO)	Log with Comms enquiry tracker	5 days
Tier 2 Non specific/vague allegations	Head of Fundraising & Communications for web/written enquires received by Secretariat Staff, consultants and Member to complete referral form and contact Child Protection Officer	Letter/email in response to allegation in line with Complaints Policy and if required consult with CPO CPO to undertake actions as deemed necessary and coordination with member where appropriate	CPO	72 hours
Tier 3 Specific names and locations mentioned	Staff, member, consultant to complete referral form and contact Child Protection Officer	CPO to undertake actions as deemed necessary and coordination with member where appropriate	CEO of Family for Every Child	Initial decision on action within 48 hours
Tier 4 Sensitive- involving Family for Every Child staff, board members, consultants, network members	Staff, member, consultant to complete Internal Referral form (Annex 2) and contact Child Protection Officer (CPO) and CEO. In absence of CEO, contact CPO and CPO deputy.	Actions as deemed necessary and coordination with member where appropriate (minimum action as deemed necessary until CEO available)	Chair of Board of Family and Chair of Board of member where necessary	Initial decision on action within 48 hours

CEO: amanda.griffith@familyforeverychild.org

CPO: hugh.salmon@familyforeverychild.org

CPO deputy: TBC @familyforeverychild.org