

SCI POLICY: SAFEGUARDING POLICY FRAMEWORK

Functional Area:	Global Safeguarding
Owner (Name + Position):	Susan Grant, International Safeguarding Director, Safeguarding Quality & Excellence Team
Approved by:	Chet Kuchinad, Chief People Officer
Date of Approval:	07/06/2021
Date for Review:	20/11/2022
Languages (inc. hyperlinks):	English, French, Spanish, Arabic
Applicable to:	All staff, Save the Children members' staff deployed/seconded to SCI, all representatives & third parties including trustees, partners, implementing partners, consultants, suppliers, contractors, visitors and volunteers (e.g., incentive workers, community volunteers) involved in the work of SCI

SECTION I: PURPOSE

Everyone has the right to live their life free from violence, discrimination, harassment, and any other form of abuse, exploitation or harm. Within Save the Children, effective policies, procedures, and practices seek to protect any individual - children and adults alike - from being harmed, abused, or placed at risk of harm by Save the Children programmes, staff, volunteers or other representatives.

This Policy Framework serves to identify the various policies developed within Save the Children International (SCI) to create and sustain a safe organization. There are many ways in which risks, harms, and abuses can occur within SCI. Specific policies have been developed so that every representative within SCI can better understand how to prevent harm and abuse, and to ensure proper mitigation measures and protections are in place. We recognize that while many of the policies overlap or are partially redundant with one another, each policy has been written in order to provide the necessary emphasis and specificity to the respective subject matter.

Safeguarding policies. The Code of Conduct is the over-arching policy, which should be read and applied in conjunction with:

- Child Safeguarding Policy
- Protection from Sexual Exploitation, Abuse and Harassment Policy (PSEAH Policy)
- Anti-Harassment, Intimidation and Bullying Policy
- Modern Slavery & Human Trafficking Policy

SCI defines 3 types of safeguarding

I. **Child Safeguarding (CSG)**

	<ul style="list-style-type: none"> ○ Safeguarding of any child with whom we come into contact through our work or in our personal lives; ○ Governed by the Child Safeguarding Policy; Code of Conduct; PSEAH Policy; Modern Slavery Policy ○ Managed by SCI Safeguarding
2.	<p>Adult Safeguarding (ASG)</p> <ul style="list-style-type: none"> ○ Safeguarding of adults in affected communities and with whom we come into contact through our work. ○ Governed by Protection from Sexual Abuse and Harassment (PSEAH) policy; Code of Conduct; Modern Slavery Policy ○ Managed by SCI Safeguarding
3.	<p>Staff Safeguarding (SSG)</p> <ul style="list-style-type: none"> ○ Safeguarding of all employees of Save the Children International (SCI), including Save the Children member staff who are deployed, seconded or visiting SCI and all partner staff and volunteers; ○ Governed by Anti-Harassment, Intimidation and Bullying Policy; Code of Conduct; Modern Slavery Policy ○ Managed by SCI People and Organisation (HR)

SECTION 2: POLICY STATEMENTS

1	<p>Code of Conduct</p> <p><i>Standards of behaviour for all employees and representatives, protecting all people who come in contact with our organisation.</i></p> <p>The Code of Conduct contains essential principles and rules that reflect the behaviours, standards and ethics that SCI expects from its employees and representatives working for or on behalf of the organisation in any capacity. The Code of Conduct outlines the high standards of integrity and professionalism that must be upheld.</p> <p style="text-align: center;">Applies 24/7 – work and personal life</p>
2	<p>Child Safeguarding Policy</p> <p><i>Protecting children from abuse and harm or risk of harm by Save the Children</i></p> <p>This policy is specifically concerned with protecting all children, defined as anyone under the age of 18 years, from harm or abuse by Save the Children. The Child Safeguarding Policy covers protection from all forms of child abuse perpetrated by Save the Children representative(s). Save the Children recognises five categories of child abuse, which are sexual abuse, physical abuse, emotional abuse, neglect and exploitation. Other sub-categories may be adopted from time to time. The policy also covers any unsafe or risky operational or programmatic practices that could result in harm or injury.</p> <p style="text-align: center;">Applies 24/7 – work and personal life</p>

3	<p>Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy</p> <p><i>Protecting children and adults in affected communities from sexual misconduct</i></p> <p>This policy is specifically concerned with preventing any form of sexual exploitation and abuse perpetrated by any Save the Children representative against any person directly or indirectly engaged in our programming and in the wider communities in which we work.</p> <p style="text-align: center;">Applies 24/7 – work and personal life</p>
4	<p>Anti-Harassment, Intimidation and Bullying Policy</p> <p><i>Protecting our employees from harm by other employees</i></p> <p>This policy is specifically concerned with providing a safe working environment for all those who work for Save the Children. It covers sexual harassment and other discriminatory or disrespectful behaviour within the workforce, including intimidation and bullying.</p> <p style="text-align: center;">Applies 24/7 – work and personal life</p>
5	<p>Modern Slavery & Human Trafficking Policy</p> <p><i>Preventing human trafficking and modern slavery within Save the Children and business partners and suppliers</i></p> <p>This policy outlines Save the Children’s principles, approaches to modern slavery, and our commitment to acting ethically and with integrity in all our business dealings and relationships, including implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in SCI’s business or in its supply chains.</p> <p style="text-align: center;">Applies 24/7 – work and personal life</p>

SECTION 3: DEFINITIONS

<p>Definitions for policy specific terms can be found in the respective policies. The following are terms to ensure proper understanding of this guidance document.</p>	
Word/Term	Definition
<p>Adult Safeguarding (see Annex I)</p>	<p>Adult Safeguarding within Save the Children refers to our collective and individual responsibility to prevent and respond to any form of abuse, exploitation or harassment committed by Save the Children employees or representatives, against any person 18 years and older</p>

	receiving benefits, engaged in community programming, and/or living in the affected communities and populations where we operate.
Affected Communities	Any location in which SCI has a business presence which may include but is not limited to delivering programmes, services, and projects, responding to a humanitarian crisis, working on a development project, and/or delivering a campaign.
Child	A person under the age of 18, regardless of the age of majority or age of consent locally.
Child Abuse	Child abuse consists of anything, which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood. Five main categories of child abuse are Physical Abuse, Sexual Abuse, Emotional Abuse, Exploitation, and Neglect.
Child Safeguarding (Save the Children's definition)	Child Safeguarding is making Save the Children <i>safe</i> for children. It involves our collective and individual responsibility and actions to ensure that all children are protected from deliberate or unintentional acts that lead to the <i>risk of or actual</i> harm by Save the Children staff, representatives and third parties, who come into contact with children or impact them through our development interventions, humanitarian responses and operations. This includes our direct programme implementation, work through partners and management of children's personal data.
Staff Safeguarding	Staff Safeguarding is about preventing and responding to all forms of harassment, intimidation, discrimination, abuse of authority and bullying between staff in the workplace or in work related settings. Harassment, intimidation, discrimination and bullying may be carried out by an individual against an individual (perhaps by someone in a position of authority such as a manager or supervisor) or involve groups of people. It may be obvious or it may be insidious.
Zero Tolerance	Save the Children does not tolerate any form of exploitation, abuse or harassment against any person. Save the Children commits to applying the same standards to all its employees and subject them to the same processes regardless of their position, influence, or reputation within or outside of the organization.
Zero Tolerance for Inaction	Save the Children will respond to all credible concerns or allegations and, where necessary, take prompt action (including conducting an investigation and taking disciplinary action, if applicable).

SECTION 4: RELATED DOCUMENTS

1	SCI Code of Conduct
2	SCI Child Safeguarding Policy
3	PSEAH
4	SCI Anti-Harassment Policy
5	UK Modern Slavery Act 2015
6	UN Secretary General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)
7	SCI Safeguarding Investigation Procedure
8	SCI Incident Reporting Procedure
9	SCI Whistleblowing Policy
10	SCI Disciplinary Policy
11	SCI Data Retention Policy

ANNEX I: Understanding Adult Safeguarding

Preface As a child rights and social justice organization promoting the education, health, and protection of children, Save the Children works in some of the most complex contexts across the globe to deliver programs and activities to children in some of the world's most vulnerable communities. However, children are not the only people with whom we have contact. While we recognize the special vulnerabilities of children, we are also cognizant of the fact that adults¹ in affected communities are susceptible to abuses by humanitarian and development workers. This risk is of particular concern to INGOs in which inherent power imbalances exist and high levels of trust are granted. These inequalities can be exacerbated by other factors such as socio-economic status, gender, age, disability, ethnic & tribal identity, faith or religious affiliation, and/or sexual orientation, all of which can reinforce dependency and increase vulnerability to harm and abuse.

Types of Adult Safeguarding:

1. **Physical Abuse:** The *non-accidental* use of physical force that inadvertently or deliberately causes a *risk of or actual* injury or suffering to any adult over the age of 18. All persons - children and adults alike - have the right to autonomy over their bodies. Intrusion of one's body may occur in the form of hitting, slapping, kicking, pulling, punching, grabbing, genital mutilation, shaking, pinching, pushing, striking a person with any instrument (e.g., stick, shoe, or other objects) or other physical acts.
2. **Sexual Exploitation and/or Sexual Harassment:** Sexual exploitation and harassment is the actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This type of harassment and sexual violence can include but is not limited to unwelcomed sexual advances, requests for sexual favours, and other verbal or physical conduct of sexual nature that is implicit or explicit.
3. **Neglect/Negligent Treatment:** The failure to meet an adult's basic physical and/or psychological needs either deliberately or through negligence (omission/failing to act). Some ways that adult neglect may manifest through our work includes but is not limited to (a) providing inadequate/poor health care (e.g., maternal health care, post-natal follow up care, etc.); (b) refusing to provide a service for which the adult is eligible; or (c) failing to improve unhealthy or dangerous environments at a distribution (e.g., adults standing in sun without shelter for extended time or without hydration, lines forming near busy streets, etc.)
4. **Exploitation:** Gaining socially, politically or financially from an adult *or* exploiting them in return for something they or their families want or need.
5. **Bullying, Harassment, and Intimidation:** SCI's policy can be found on OneNet via the Quality Framework.² In addition bullying, harassment and intimidation, adults have the right to be protected from discrimination³ and emotional abuse.⁴
6. **Road Traffic Accidents:** Any injury or death of an adult caused by any SCI representative as a result of negligent driving, inattention, or accident.

¹ Adults include anyone over the age of 18 in communities where we work (e.g., affected communities). Adults have the right to self-determination. If an adult lacks the capacity for self-determination due to cognitive or physical disabilities, this can increase the risk of harm or abuse to that person.

² Access OneNet. Select International Programs → International Programs Operations → Quality Framework → People & Organization → Anti-Harassment Intimidation and Bullying Policy

³ Treating an individual differently than another because of that individual's membership in, or affiliation with, a protected category, or that of an individual's relatives, friends, or associates.

⁴ Emotional abuse may occur as an isolated event *or* on an ongoing basis. Emotional abuse includes but is not limited to any humiliating or degrading treatment (e.g., bad name-calling, threats, yelling/screaming/cursing at, teasing, constant criticism, belittling, persistent shaming, criticizing a parent's rearing style, etc.), failure to meet an adult's emotional needs, and rejecting, ignoring, terrorizing, isolating or confining an adult.

7. **Unsafe Programming:** Any form of injury or harm to an adult related to an unsafe programming environment including but not limited to poor construction or accident leading to injury.
8. **Other:** Any activities or behaviours that create a risk to adults including but not limited to exchange of personal contact information, sharing or misusing personal data, and/or using images, video, or narrative without prior and full informed consent.

How is Adult Safeguarding different from Child Safeguarding? Save the Children is responsible to protect all persons from the *risk of or actual* abuse or harm that may occur in the course of programming or business operations, and we, therefore, commit to making our organization safe for *all* members of affected communities. The principles of Adult Safeguarding run parallel to Child Safeguarding in that Save the Children has **zero tolerance** for any sexual harassment, exploitation, and/or abuse perpetrated by SCI representatives against adults in affected communities. This means that all employees, volunteers, partners, and other representatives are responsible for knowing how to safely engage with adults in affected communities and how to report concerns when they arise.

How to report an Adult Safeguarding concern: If you have a concern, suspicion, or know about an adult in an affected community being harmed or abused, it must immediately be reported through an approved Save the Children reporting channel like Datix, the Whistleblowing email, the SafeCall hotline, or to your local Safeguarding focal point.

How can we prevent Adult Safeguarding violations? Preventing harm to adults in affected communities requires an understanding of how to safely engage in communities where we work and increasing vigilance in how we can detect risks or indicators of harm and/or abuse. There are several things we can do - starting today - to ensure that adults in affected communities are safe from harm, abuse, and exploitation:

1. Save the Children representatives will treat all adults with dignity and respect.
2. Adults have the right to self-determination and autonomy. Their opinions, bodies, and decisions should be respected.
3. It is our responsibility to engage communities, to understand their concerns, to respond to their concerns, and to implement solutions suggested by community members that will increase their safety and improve the efficacy of our work in their communities.
4. Aid is always free. This message must be clearly delivered and reinforced in all areas where Save the Children is operating. Wherever culturally and operationally appropriate, there should be clear signs about PSEAH⁵ and Safeguarding of children and adults, along with information about reporting concerns. Translations should be culturally appropriate for ease in understanding concepts associated with PSEAH.
5. Two Save the Children employees should always be present during all programming and operational activities in which there is interaction with adults in affected communities. Wherever possible, there should be a gender balance in representation of staff present at distributions, health centres, and other programming locales where adults and/or children are present.
6. Outside of normal operating hours, Save the Children representatives should not seek out or otherwise engage with adults from the affected communities for purposes of exploiting their position of trust and/or power within the community. Save the Children representatives should seek counsel from the safeguarding focal point, human resources professional, gender/equality specialist, or Country Office management if there are questions about acceptable interactions outside of normal business hours.
7. For Save the Children representatives who live in the communities and are from the affected communities, it is strongly encouraged that any relationship with an adult from the affected community is disclosed to the local human resources professional.

⁵ Protection Against Sexual Exploitation, Abuse, and Harassment.

8. Any and all concerns, suspicions, and known occurrences of harm and/or abuse must be immediately reported through an established reporting channel. (See above.)