

Child Safeguarding Policy

Version: 2nd March 2017

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1. Introduction

Sightsavers is an international development organisation committed to supporting the development of health systems in low and middle income countries and to advancing the rights and improving the quality of life of people with disabilities. Our programmes include health, education and social inclusion interventions in more than 30 countries worldwide. Many of those benefitting are children and young people. We do not implement projects primarily on our own but work with a range of partners including government, civil society actors and the private sector. It is therefore primarily our partners who work directly with children.

This Child Safeguarding Policy replaces the existing Child Protection Policy 2006. It provides clear definitions, sets standards across the organisation, and gives clear guidance on how to apply and implement the policy throughout the organisation and in relation to partner organisations. The “Keeping Children Safe” standards have been used as a reference.¹

What is child safeguarding?

A child safeguarding approach is one designed to identify and minimise the risks of harm or abuse to children from any planned activity. It is part of the more comprehensive child protection approach, which entails a wide potential range of policies, procedures and activities seeking to address child safety as their primary concern.

In Sightsavers' case, a child safeguarding approach means minimising the risk of harm to children from staff, operations and programme activities, including that any concerns about children's safety within communities where we work are reported to the appropriate authorities. This policy focuses on addressing those risks by developing standards and mitigating measures to target and reduce residual risk.

Following the widespread and serious allegations of sexual exploitation and abuse by aid workers in West Africa at the turn of the millennium, the UN Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse was issued in 2003. It has been applied by all major humanitarian agencies and integrated into their policies and procedures.

Subsequently the “do no harm” principle is now widely recognised and implemented and it is recognised that child safeguarding measures for organisations are an important element in the wider strengthening of child protection systems at national as well as local level when providing health, education and social protection services.

It is known that children with disabilities face particular risks relating to safeguarding. This policy recognises that these specific risks will be best addressed through a broader child safeguarding approach and therefore the focus is on a twin-track approach of strengthening this, with specific actions focused on children with disabilities where relevant.

¹ Keeping Children Safe :Child safeguarding standards and how to implement them,

www.keepingchildrensafe.org.uk

2. Target groups of the policy

The Child Safeguarding Policy is to be applied across all organisational activities and in all of Sightsavers' programme themes, including health, education, social inclusion and research. All Sightsavers' representatives and partner organisations² should be aware of and adhere to the policy. Sightsavers' representatives are defined as trustees, employees (permanent or temporary), consultants, volunteers who work directly for Sightsavers and donors travelling on Sightsavers business.

In addition to complying with the policy all representatives must sign and will be held accountable to Sightsavers' Child Safeguarding Code of Conduct³.

First and foremost, it is expected that partners will have policies and procedures in place covering child safety, in order for Sightsavers to enter into partnership. This will not always be the case as the start of a partnership, particularly with grassroots civil society partners. Where partners do not have appropriate policies, but it is deemed essential that Sightsavers work with them, policies will be developed as part of the early stages of the partnership, led by the due diligence process. These should include child safeguarding and partners could use this policy as a foundation, adapted to the legislation of the relevant country.

It is recognised that, for government partners in particular, national policy and legal frameworks take precedence. However, where the national legal framework is considered weaker than Sightsavers policy, it may be a specific national advocacy activity to strengthen that framework, particularly with regards to provision for children with disabilities.

Sightsavers is unable to enforce the policy with independent, external agencies, such as partner organisations. However we can choose not to work with partners, put specific conditions into partnership agreements, or end partnerships based on partners' policies and their implementation of these, including child safeguarding.

3. Purpose and commitment

The purpose of this policy is to ensure that Sightsavers activities are implemented in a safe and protective environment where abuse, exploitation and violence against children are effectively prevented as far as reasonably possible and responded to.

The policy has three specific objectives:

- 1) Keeping children safe
- 2) Safeguarding the reputation of Sightsavers, including guarding Sightsavers' representatives from false allegations or from operating within an unclear framework
- 3) Ensuring the highest standards of behaviour from representatives and minimising the risk of child abusers entering the organisation.

² Partner organisations here are defined as those included within Sightsavers' Partnership policy

³ See Sightsavers code of conduct, included as Annex 3

Sightsavers is committed to doing whatever we can to keep all children safe, with a specific focus on children with disabilities. Sightsavers' work with children is guided by the UN Convention on the Rights of the Child (CRC) (with specific reference to article 19 on protection from all forms of violence, injury, exploitation, abuse, neglect, mistreatment and sexual abuse) and the Convention on the Rights of Persons with Disabilities (CRPD) including its special provisions for the protection of children with disabilities from cruel, inhuman or degrading treatment or punishment (article 15) and exploitation and abuse, including gender-based violence (article 16). It also recognises the rights of children with disabilities to services, to access to justice, to full participation in their communities, in line with the CRPD. This means that effective safeguarding from the additional risks faced by children with disabilities does not include preventing them from accessing these rights.

In all activities including children as participants or as beneficiaries, including fundraising, communications and programme activities, primary consideration should be given to child protection concerns, including child safeguarding measures, following the four key principles of the CRC, namely:

- a) "the best interest" of the child
- b) the child's right to life and development
- c) the child's right to be heard/participate
- d) the child's right to non-discrimination.

Children with disabilities

Sightsavers has a specific mandate to protect and promote the rights of children with visual impairment but is increasingly directly involved with support to other children with disabilities. Recent research on child protection and disability⁴ has found that children with disabilities experience far higher levels of abuse than their peers. Girls and boys with different impairments are vulnerable to many forms of abuse but most at risk are children with intellectual impairment and communication difficulties. Emotional and sexual abuse are mostly reported by girls with disabilities, but boys with disabilities are also targeted. Negative cultural norms around disability contribute to putting children with disabilities at risk of violence and abuse, including factors such as stereotyping, prejudice, discrimination, isolation, difficulty in protecting oneself or inadequately understanding and/or communicating that abuse has occurred.

Children with visual impairments are especially vulnerable as they are dependent on tactile guidance. They are also likely to be particularly vulnerable in care situations, where they require assistance with toileting, dressing, bathing etc.

Sightsavers will work with its programme partners to make sure that particular risks of violence, abuse, exploitation and neglect facing children with disabilities will be properly assessed, addressed and monitored within the local context where Sightsavers' partners operate.

Sightsavers commits to communicating this policy throughout the organisation, to partners and, where relevant, to children themselves, their parents and other beneficiaries in programme activities; as part of a broader programme to challenge stereotypes and cultural norms around disability, particularly with regards to children's potential and rights.

³ Plan International 2016 "Protect Us"-inclusion of children with disabilities in child protection

4. Standards

Standard and aim	Specific areas of activity / indicators	Owner
<p><u>Awareness and communication:</u></p> <p>All Sightsavers representatives are aware of the policy and the organisation communicates its approach to key stakeholders</p>	<p>1.1 All Sightsavers representatives are responsible for complying with the policy and code of conduct, including following all reporting and response procedures outlined.</p> <p>1.2 Sightsavers representatives⁵ will be introduced to the policy and sign the code of conduct as part of their induction, contracting or ongoing management process.</p> <p>1.3 All partner organisations must receive a copy of the policy and code of conduct as part of the development of any Memorandum of Understanding (MoU) or Project Funding Agreement process (PFA).</p> <p>1.4 Sightsavers will communicate the policy through its website and directly to core stakeholders⁶, to demonstrate its commitment and the importance of the policy</p> <p>1.5 In particular, Sightsavers will communicate about and where available share research of child safeguarding issues specifically in relation to children with disabilities</p>	
<p><u>Working in partnership to safeguard children:</u></p> <p>All Sightsavers partners will have policies and procedures in place covering child safety</p>	<p>2.1 Sightsavers will only enter into an MoU or PFA with organisations that either have these in place, or are committed to developing them, based on Sightsavers' policy, as an integral part of the partnership and where specifically mentioned within the PFA. This will be assessed during the due diligence process.</p> <p>2.2 Where a partner's policies and procedures are less strong than Sightsavers, and where they do not address issues of children with disabilities specifically, consideration will be paid to advocating for and providing technical support to strengthening of the policy.</p> <p>2.3 Assessment of risks to children are included as a specific part of the project development or inception phase of every project, using the approved toolkit.</p>	

⁵ Sightsavers' employees, permanent and temporary, consultants and volunteers employed by Sightsavers

⁶ To include, but not limited to: DFID, Irish Aid, European Commission, World Bank, Gates Foundation, USAID, WHO, select INGO partners (Fred Hollows Foundation, International Disability Alliance, ADD International etc), Comic Relief, Big Lottery Fund, selected major donors, Merck, Pfizer, Unilever, Standard Chartered Bank.

<p><u>Putting the policy into context:</u></p> <p>All Sightsavers countries apply and implement the policy</p>	<p>3.1 Each office location has a Child Safeguarding Focal Point (CSFP) in place with clear responsibilities for coordinating the implementation of the policy as well as mapping the local / external context (including legislation) for child safeguarding.</p> <p>3.2 Each country has in place a child safeguarding reference group which develops and reviews annually the country child safeguarding plan based on this policy, outlines the members of the reference group, contact details for the CSFP, any specific contextual adaptations to the policy (agreed with the CSM) and any advocacy, training and awareness plans.</p> <p>3.3 The plan will specifically include a communications plan including how it will be rolled out with partners, children, parents, communities.</p> <p>3.4 Each CSFP will work with the Child Safeguarding Manager (CSM) and reference group to assess any contextual issues with the policy and develop country specific procedures if relevant. These will include guidance for Sightsavers representatives about appropriate official reporting procedures in the case of an incident.</p> <p>3.5 Country procedures will be reviewed each time the global policy is reviewed, instigated by the CSM, or a specific incident occurs or the national legislative environment changes, instigated by the CSFP.</p>	
<p><u>Putting the policy into practice I:</u> Recruitment, selection and training</p>	<p>4.1 Sightsavers will ensure safeguarding issues are part of any relevant job description. This will include all positions reporting into the CEO, as well as specific positions where employees will be expected to come into direct contact with children.</p> <p>4.2 Recruitment processes for these employees will include relevant questions on experience working with children and additional references or background checks will be undertaken for posts identified as high risk.</p> <p>4.3 Sightsavers will provide necessary training and support to representatives to ensure effective implementation of the policy.</p> <p>4.4 Capacity – CSM and CSFP. Support, training and time to undertake the role.</p>	
<p><u>Putting the policy into practice II:</u> Programme activities</p>	<p>5.1 Specific programme guidance will be developed for each thematic area: inclusive education; social inclusion; eye health and NTDs, by the relevant Global Technical Lead or Technical Advisor, working with the CSM. This should be developed in consultation with children or their representative organisations to ensure it is robust and responsive to actual needs.</p>	

	<p>5.2 A child safeguarding focused risk assessment will take place during every new project as part of the risk assessment process, either during the Project Design Process (PDP) or the induction phase, with a specific section on children with disabilities in all cases.</p> <p>5.3 A risk assessment will also be conducted for any other activity directly involving children, including fundraising and communications activities where contact is made and information on the child is gathered.</p> <p>5.4 The risk assessment will include mitigating actions which will be incorporated into project design and documentation. This may include supporting the training of partner staff.</p>	
<u>Putting the policy into practice III: Communications activities</u>	<p>6.1 Sightsavers representatives will ensure that appropriate consent is obtained before images or stories of children are captured or shared.</p> <p>6.2 Sightsavers will ensure that children are represented in an appropriate way that does not victimise or sexualise them.</p> <p>6.3 Sightsavers will only collect data on children for a specific authorised purpose and it will only be used as intended. It will be stored in a way which complies with relevant legislation and our own data protection procedures.</p> <p>6.4 Any breaches to the security of child sensitive data must be reported and acted on immediately.</p> <p>6.5 Sightsavers staff will not use Sightsavers equipment to view, share or access illegal or inappropriate material including that which specifically includes children.</p>	
<u>Reporting and responding to child safeguarding incidents</u>	<p>7.1 Sightsavers will ensure that reporting and incident management procedures to handle incidents of child abuse are in place, communicated to staff and effectively used to enable an appropriate and swift investigation of any given case.</p> <p>7.2 All Sightsavers representatives must also follow appropriate and relevant national legislative and criminal reporting procedures as advised by the CSFP.</p>	

5. Measures to implement the policy

The child safeguarding policy requires the following steps for its implementation.

Staffing including the designation and training of a global Child Safeguarding Manager (CSM), as well as Child Safeguarding Focal Persons (CSFP) in each country office. The CSM role should be played by an existing senior member of staff.

Prevention measures including awareness raising, training of relevant staff, risk analysis, recruitment procedures, induction of staff in the policy and codes of conduct for Sightsavers' representatives and incorporation of the policy into relevant existing systems eg the Resilience travel sign off process.

Reporting and responding measures including steps for alerting and reporting incidents, investigation and incident management, duties and responsibilities of assigned managers and child safeguarding focal point persons.

Implementing and maintaining the policy, including training and capacity building of staff and partners, monitoring, reporting and review of the policy.

5.1 Staffing

Child Safeguarding Manager (CSM) and Child Safeguarding Focal Persons (CSFP)

Sightsavers will designate a CSM at international level and CSFPs to cover all countries of operation (these may be based in global teams outside of the country where relevant). These roles will be added to the job descriptions of existing staff, with the workload of those staff being adjusted to reflect safeguarding activities. The selection of the CSFP will be undertaken in discussion between the most senior staff member in each country and the CSM. In countries where Sightsavers has no office a staff member responsible for managing the local partner programme will be assigned. Sightsavers will not allocate this role to a non-staff member. The contact details of the CSFP must be included on all country information documentation provided to visitors to the country.

There are two fundamental aspects to these roles, with specific levels of responsibility within each for the CSM and each CSFP:

- 1) To build the understanding and capability of the organisation required to implement this policy. This will include direct knowledge and information transfer, and accessing appropriate external expertise.
- 2) To act as the reporting mechanism for any incident and use lessons learned from specific incidents to improve policy and practise.

Sightsavers will ensure sufficient time is given to the CSM and CSFPs to acquire the necessary skills and knowledge and to undertake the above activities. Line managers will recognise the priority of CSFP roles in incident reporting and response when an incident occurs and the dual reporting line required for this area of work.

In addition, each country office will have a designated child safeguarding "reference group" (consisting of the Country Director, the CSFP and an additional senior manager where available).

The members of this group should be noted in the national child safeguarding plan, but may need to be adapted in response to the specific nature of an incident, see below.

5.2 Prevention

Staff recruitment

All recruitment of staff will include a full induction to the safeguarding policy and code of conduct, including the procedures should any concern for children's safety arises.

When recruiting staff Sightsavers will make sure that questions regarding child safeguarding are included in relevant job interviews and that safeguarding issues are part of any job description where the employee will be expected to come into contact with children during their assignment. Where possible, references should be sought from previous employers to get more information of the suitability of candidates to work with children. Whenever feasible and for all relevant roles criminal records of candidates should be checked, for example for staff coming into frequent contact with children or likely to be meeting children without other employees being present (for example, staff who accompany consultants or contractors on project visits).

All Sightsavers representatives will be required to acknowledge receipt of and compliance to the Child Safeguarding Policy and sign up to the Code of Conduct prior to their employment.

Awareness

Sightsavers will designate staff with the responsibility of building internal awareness and supporting relevant capacity development of the organisation in child safeguarding, as detailed in section 5.1 of this policy. All Sightsavers' representatives and partner organisations will be duly notified of the Child Safeguarding Policy and be made aware of how they will be expected to comply with it. The policy will be translated into the appropriate national languages where Sightsavers operate. It will be the responsibility of all Sightsavers staff to share the policy and approach as relevant to external stakeholders.

Sightsavers will provide necessary training and support to global and country staff and partner organisations to enhance understanding and ensure effective implementation of the policy.

Sightsavers' country offices will be requested to adapt the policy to their country context particularly where national legislation conflicts with the policy. This will be done in discussion with the CSM, to ensure the intent of the policy remains. In all circumstances, the Code of Conduct will remain the same. Each country will develop a country policy schedule, including naming the CSFP and country reference group.

Sightsavers will ensure that all supporters, donors, sponsors and media representatives involved with Sightsavers work have access to the Child Safeguarding Policy through its website and will take appropriate steps to communicate that availability.

Risk analysis

When working with partners, Sightsavers will endeavour to ensure that the programmes it supports are safe for the children they serve. To ensure that appropriate child safeguarding measures have been put in place, Sightsavers will work with the partner, either during the project development process, or the inception phase, to carry out a risk analysis which specifically includes any child safeguarding issues and propose actions to mitigate these risks, prior to the activities taking place.

Such risk analysis will be an integral part of project proposals, programme planning guidelines and partnership assessment tools.

Code of Conduct

All Sightsavers representatives are required to understand their responsibility to keep children safe and to sign and abide by the Sightsavers Code of Conduct (Annex 1) which lists acceptable and unacceptable behaviour, primarily designed to safeguard children. It also serves to guard the name and reputation of Sightsavers and its representatives from false accusations. All Sightsavers staff are responsible for encouraging and promoting the implementation of the Code of Conduct.

The adherence to this code is mandatory for all Sightsavers' representatives. Any violation of the Code of Conduct will result in disciplinary procedures in addition to any relevant legal action. To give maximum protection to beneficiaries, the organisation and staff, the Code of Conduct is to be applied both within and outside of working hours.

5.3 Reporting and responding to incidents

Sightsavers will ensure that reporting and incident management procedures to handle incidents of child abuse are in place and effectively used to enable an appropriate and swift investigation of any given case. Sightsavers' representatives should be properly informed of the reporting and incident management procedures. Any Sightsavers representative having concern or suspicion regarding child abuse by someone representing another agency must report such concerns to a Sightsavers senior manager or designated CSFP.

Confidentiality

All reports and the information herein will be handled with the strictest confidentiality to protect the identity of the child concerned, the informer and the accused, both appropriately and in accordance with relevant British and or other national legislation.

Procedures to be followed in the case of an incident

Agreed procedures to be followed are included as Annex 2.

Consequences of abusing children

Inappropriate behaviour towards children including failure to follow the general requirements and specific code of conduct of this policy is grounds for the following measures

Representatives

If an employee has been under investigation by Sightsavers or by official law enforcement authorities for any area of child abuse as defined under this policy, they will be subject to the relevant employee disciplinary procedures. Under these procedures they may be temporarily suspended during the investigation. If an employee is dismissed for proven abuse Sightsavers will inform the relevant authorities, disclose this information to prospective future employers and / or refuse a reference, depending on the details.

Partner organisations

Appropriate action will be taken up to and including immediate termination of a partnership or service agreement. In this case, the short or long term impact on beneficiaries of the termination of a partnership will be considered.

5.4 Implementing, maintaining and reviewing the policy

Sightsavers will integrate child safeguarding measures into relevant core internal processes and tools such as programme technical guidelines, partner assessments and agreements, training modules, programme design, monitoring and accountability systems and recruitment procedures.

Sightsavers will make sure that proper induction and training in child safeguarding will be made available to all staff, permanent and temporary, consultants and volunteers. The CSM and CSFPs will receive additional training in order to manage their responsibilities for rolling out, managing and coordinating the child safeguarding policy and procedures.

Where relevant, Sightsavers will support partner organisations by including relevant training and technical advice to build capacity in the field of child safeguarding, with a particular focus on children with disabilities.

The policy will be monitored on a regular basis by the designated CSM and the CSFPs. An annual summary report, including all concerns received, will be submitted by the CSM to senior management. Any findings requiring a change in policy will be discussed at Council

Each Sightsavers country will develop an annual implementation plan for the policy, including actions to be taken, details of the CFSP and country child safeguarding team and relevant policy amendments adopted.

Review

A full review should take place every three years, instigated and led by the CSM and including the CSM conducting a review of external changes to child safeguarding standards that apply nationally and internationally.

6. Communications regarding children

Sightsavers is committed to adhering to ethical guiding principles on communications to minimise the risks of people with ulterior motives misusing photographs and related information beyond the agreed purpose and consent. The best interests of the child are to be safeguarded as a primary consideration. To this effect, Sightsavers' representatives and partners will abide by the following guidelines

- Ensure all interviews and images of children are undertaken with sensitivity in order to safeguard the child's rights to dignity, identity, confidentiality and privacy. Where possible children should be prepared for interviews prior to being interviewed. A parent or guardian should be present during interviews, or their permission sought before-hand for a professional adult with agreed responsibility (such as medical or educational professionals) to be present on their behalf.⁷
- Pictures of children should be decent and respectful and should not stigmatize community, family or individual child. All children, both girls and boys, should wear decent clothing appropriate to the local custom.

⁷ Annex 5 "Consent Form to interview and use images of children"

- Prior consent to use information collected in interviews and / or images of children should be obtained from children themselves (if they possess the maturity to do so) and from their parents and/or guardians. To help keep children safe, consideration should be given to how much information is published.
- Sightsavers and its partners are committed to carefully guard any information about children who feature in their publications, ensuring that their personal data are used appropriately. This also applies when material is made available to third parties. Full names should never be provided alongside other identifiers such as date of birth or community.
- Pictures, materials and personal information regarding children will be held in a secure database and according to the appropriate Sightsavers data security protocols. Access to these materials will be employees only through a password protected system. The misuse of images accessed will be treated in the same way as other breaches of this policy. Applicable data protection laws for all stored images will be followed.

Annex 1

Definitions

Child

For the purpose of this policy Sightsavers considers a child to be a person under the age of 18 years.

Child abuse

Child abuse occurs when adults or other children hurt a child, either physically or mentally. In the majority of cases the abuser is someone the child knows well, such as a parent, other caregiver, relative or friend. There are several forms of child abuse including:

a) Physical abuse

Physical abuse is the use of physical force against a child that results in injury and harm to the child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning. All forms of corporal punishment are to be viewed as physical abuse.

b) Emotional/ mental abuse

Emotional abuse is harm done by persistent or severe emotional ill treatment or rejection, such as degrading punishment, threats, bullying, not giving care and affection to a child resulting in adverse effects on the behaviour and emotional development of a child. Other harmful experiences such as frequently being forced to witness violence in their domestic environment are also classified as mental abuse.

c) Neglect

Neglect is understood as the failure by a parent or caregiver to provide a child (when they are in a position to do so) with the conditions that are culturally accepted as being necessary for their physical and emotional development and wellbeing. Neglect of children with disabilities is more common than neglect of children without disabilities and is often under- reported.

d) Sexual abuse

Sexual abuse is any kind of sexual activity involving a child, whether or not the child is aware of or consents to what is happening. Sexual abuse implies the use of a child for sexual gratification by an adult, significantly older child or adolescent, violating the child's integrity and exploiting its position of dependency. Sexually abusive behaviour include rape, incest, fondling genitals, masturbation, voyeurism, exhibitionism and exposing or involving the child in pornography or any other sexual activity, real or simulated, including on the internet or in any other medium.

e) Exploitation

Exploitation of a child refers to the use of a child for work or other activity for economic gain which may be hazardous or harmful to the child's health or development or interfere with the child's education. This includes but is not limited to, child labour and child prostitution. Sexual exploitation occurs when a child is used for sexual purposes and offered monetary or social gain as a reward.

f) Harmful traditional practices

These refer to cultural rituals, traditions or other practices that have a harmful and negative impact on the life, health, physical and psychological integrity and development of a child. Such

traditions include Female Genital Mutilation (FGM) and forced early marriage. They may also include different forms of ritual ceremonies involving children forcefully in harmful religious or spiritual activities, especially as children with disabilities may be at higher risk of becoming victims of witchcraft beliefs in certain contexts for example children with albinism.

Acronyms/glossary

Best interest of the child

An overarching principle in the Convention on the Rights of the Child:

“in all actions concerning children, whether undertaken by public or private institutions, the best interest of the child should be a primary consideration. In all matters affecting the child the views of the child should be seen as important and given due weight in accordance with the age and maturity of the child.”

Child protection

Prevention and response to abuse, neglect, exploitation and violence of children, including all measures, structures and services (child protection systems) that a society put in place for prevention and response.

Child safeguarding

Measures, policies and procedures an organisation puts in place to keep children safe from any abuse or violence by its own representatives. Child safeguarding is an element of child protection.

CRC The UN Convention on the Rights of the Child (1989)

CRPD The UN Convention on the Rights of Persons with Disabilities (2008)

CSFP Child Safeguarding Focal Person

CSM Child Safeguarding Manager

Sightsavers representatives

Sightsavers' employees, permanent and temporary, consultants and volunteers employed by Sightsavers.

Annex 2

Procedures to be followed in the case of an incident

1. Any representative of Sightsavers who suspects, receives an allegation or is made aware of an actual case of abuse or other child safeguarding concern must report it immediately to the designated CFSP in the country where the incident occurred. If the representative cannot contact the CFSP, the CSM must be informed before other staff in the country are informed.
2. From the point when they are aware of the incident, the CFSP must submit a written report⁸ to the CSM wherever possible within 24 hours or, if this isn't possible, to call, email or text a summary report within this period, with a written report to follow as soon as possible. The CSM should then inform the Head of Governance and Assurance (HGA).. The HGA maintains a formal record of all such reported incidents which must be summarised and reported in the annual return made to the Charities Commission.
3. The CSM and HGA will assess the severity of the incident and decide whether to invoke the global crisis response process. In all cases, Sightsavers' CEO will be informed of the incident and crisis response invoked, with all relevant staff and governance level communication initiated. In all instances, the CEO will inform, as a minimum, one of the following Trustees: the Chairman, Vice Chairman, Treasurer or Chairman of the Audit Committee.
4. If the incident is to be dealt with by the relevant country safeguarding reference group, the CSM will communicate with the most senior member to initiate the group. This may involve adding an additional member or members, including external members such as a lawyer.
5. If all or part of the role of the country reference group is to be played by the global crisis response team, that team will include the CSM and country staff as appropriate. The first meeting of the team will agree the roles of the global and country teams, in accordance with the procedures and control documentation in Sightsavers' Crisis Management Protocol.
6. Once constituted, the group will determine the immediate steps to be taken including:
 - a) Reporting immediately, or as soon as possible after becoming aware, to relevant local law enforcement agencies or any other external body if the matter is of a criminal nature. All incidents must be reported at the global level in the UK to the Child Exploitation and On-line Protection department of the National Crime Agency must be informed, the Charities Commission via email: rsi@charitycommission.gsi.gov.uk and other affected organisations must also be advised (this includes major donors and other regulatory bodies).
 - b) Referring the concerned child/children and their families to the relevant support services, or ensuring the partner organisation directly in contract with the child does so
 - c) Monitoring and reporting on the progress of the investigation and providing information and guidance as appropriate,
 - d) Supporting staff in any related legal procedures, such as giving of evidence.
 - e) Liaising with CSM to determine if internal investigation is required and if the matter is viewed as a breach of this policy, including whether disciplinary procedures should be invoked.
 - f) Subsequent to the investigation, the CSM will compile a written report including all necessary information on the nature of the case, child safeguarding concerns, investigation process and any learning to inform policy, practice, programmes or country plans.

⁸ Annex 4 Reporting form for suspected cases of abuse

Annex 3

Code of Conduct (to be applied within and out of working hours⁹)

I, (insert name), acknowledge that I have read and understand Sightsavers' Child Safeguarding Policy.

By signing this document, I agree:

- To comply with the Child Safeguarding Policy of Sightsavers and this Code of Conduct.
- To report any concerns or incidents in line with the procedures set out in the policy.
- To raise awareness of the policy and Code of Conduct in my work environment where relevant.

I will:

- Be committed to playing my part in creating a culture of openness and mutual accountability at the work place. This culture will enable all safeguarding protection concerns to be raised and discussed and where abusive behaviour can and must be challenged.
- Help create and/or uphold an environment where children are listened to and respected as individuals and which is safe, positive and encouraging for them.
- Ensure the use of the 'Two Adult Rule'. This means, when interacting with children in a work context I will ensure that another adult is present or within reach.
- Ensure physical contact is at all times appropriate and not an invasion of the child's privacy.
- Use positive, non-violent methods to manage children's behaviour.
- Respect children's dignity and their need to be safeguarded at all times when taking photographs, filming or writing reports for public relations work.
- Ensure that when photographing, filming or interviewing children, the guidelines within the policy are followed and that consent has been obtained, children are properly dressed and are not depicted in sexually charged poses or in ways that characterise them as entirely reliant on the viewer.¹⁰
- Recognise that deliberately favouring some children to the exclusion of others can actually lead to further ostracising them from their peer group, acting to minimise favouring particular children to the exclusion of others.
- Protect and handle personal data of children with care, to minimise the risks posed by third parties who receive information about children from Sightsavers or its partner organisations.
- Respond to all concerns, allegations or disclosures according to the reporting protocol¹¹.
- Comply with any investigation (including interviews) and make available any information necessary.

⁹ For consultants and volunteers, this only applies while undertaking Sightsavers business, but this includes out of working hours while on Sightsavers business.

¹⁰ Consent form in Annex 5

¹¹ Reporting form for suspected cases of abuse in Annex 4

I will never:

- Engage in sexual activity or have a sexual relationship with a child, regardless of consent or local custom. Mistaken belief in the age of a child is not a defence.
- Make sexually suggestive comments or actions to a child, even as a joke.
- Act in ways that may be abusive or may place a child at risk of abuse.
- Hit or otherwise physically assault, or physically abuse a child. Use any form of corporal punishment as a disciplinary measure.
- Condone, or participate in behaviour with children that is illegal, unsafe or abusive, including being part of harmful traditional practices, spiritual, ritualistic or substance abuse.
- Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
- Condone or in any way force a child to participate in pornography or any other form of sexual activity, real or simulated, on the internet or in any other medium
- Exploit children for their labour (e.g. domestic servitude, street begging) or for sexual purposes, e.g. prostitution)¹² or trafficking of children. The definition of child domestic work does not include occasional house help, babysitting, kitchen gardening during school holidays or general domestic tasks out of school time.
- Touch, hold, kiss or cuddle children in an inappropriate and/ or culturally insensitive way.
- Engage in activities involving close body contact with children beyond professional requirements.
- Help children with acts of an intimate or private nature, which they can do for themselves. Such actions may only be undertaken for a child who has acknowledged the need for that assistance directly or through a parent / guardian.
- Marry a person below the age of 18, regardless of consent and local custom.
- Develop relationships with children that could in any way be deemed exploitative or abusive.
- Spend excessive time alone with a child, away from others, behind closed doors or in a secluded area in line with the 'Two Adult Rule'
- Take a child met through work to my home or visit a child met through work at their home when I may be alone with that child.
- Sleep in the same bed or the same room as a child met through work or allow a child met through work to stay overnight at my home.
- Take a child met through work alone in a vehicle unless it is absolutely necessary and with parental and managerial consent.

Location and date: _____

Signature: _____

¹² unawareness of a child's age does not count as an excuse

Annex 4

Incident reporting form

To be sent to the designated Child Safeguarding Manager at Sightsavers and/or the Child Safeguarding Focal Person in your office location.

Email subject: “URGENT: Attention, please treat this email confidentially”

The information contained in this form is confidential. This form is for reporting concerns about potential violations of Sightsavers Child Safeguarding Policy and Code of Conduct. It should only be sent to the Child Safeguarding Manager in line with the procedures within that policy.

Please try to provide as much information as possible in the form. Areas where you have nothing to report can be left blank. If you have any doubt whether you should report your concerns, the following check list may help you to make a decision:

What kind of situation are you concerned about? (Delete as appropriate)

Did you witness child abuse?

Yes No

Do you suspect someone of child abuse?

Yes No

Has someone been accused of child abuse?

Yes No

Has someone reported child abuse to you?

Yes No

Does your concern relate to one of the following categories?

Yes No

Do you believe that a child may have been neglected?

Yes No

Do you believe that a child may have been mentally abused?

Yes No

Do you believe that a child may have been sexually abused?

Yes No

Do you believe that a child may have been physically abused?

Yes No

Do you believe that a child may have been exploited?

Yes No

Your concern is justified if you have answered YES to any of these questions. As a Sightsavers Representative it is your duty to report your concern with this form. Please do not delay; a child

could be at risk or in serious danger if you do not act. However, please do not take any personal action or disclose any information to Third Parties until you have spoken with the Child Safeguarding Manager or Child Safeguarding Focal person.

A) Information about you

Name:

Position within Sightsavers or relationship to Sightsavers:

Contact information

Address:

Mobile:

E-mail:

What is your relationship to the child or children concerned?

B) Information about the child (delete as appropriate, or leave blank if unknown)

If more than one child is affected, please fill out a separate form for each

Name:

Gender:

Nationality:

Age:

Date of birth:

Name of Sightsavers Partner/Project:

Relationship of the child to the potential abuser:

Address of the child (or information about the person with whom the child lives):

Current location of the child:

What measures have been instituted to ensure the child's safety? Who has carried these out?

What if any measures have been instituted to ensure that the abuse cannot continue? Who has carried these out?

What other measures are necessary to protect the child?

Does the child have a disability or are they particularly vulnerable to abuse in another way? If so, please explain further.

If the child has specific communication needs, please specify

Has the child been repeatedly abused? Yes No

Has the child been traumatized? Yes No

Please mention any special cultural factors that need to be taken into consideration:

What relevant bodies have been informed, mention date and time contact was made, the name of the person with whom you spoke and any details of the conversation.

C) Information about the potential abuser (delete or leave blank as appropriate)

Name:

Gender:

Age:

Nationality:

Relationship to the child:

Relationship to Sightsavers or partner:

D) Information about your concern

Type of concern/suspicion (please describe the course of events as you understand it. Include the nature of the abuse or mistreatment, who reported it, circumstances of the abuse, location, date and time of abuse and any witness). Take as much space as needed.

Conversation report: If you have spoken to the child concerned, describe exactly what the child said with his or her own words and what you said. Don't direct the conversation with leading questions, report only exactly what the child says.

Observations (such as injuries, emotional state, general impression of the child, etc.):

Have you confronted the suspected individual with the allegations? Yes No

If yes, how did the suspected individual respond to the allegations?

Location:

Signature:

Date:

Annex 5

Permission for collection and use of content

Translate and/or read this statement: "Sightsavers uses photos, video, interview answers and audio to tell the stories of those affected by disability and/or sight loss and its causes, and to show people how our work can help. To do this, we request your permission to take an interview, audio, photos and/or videos. The material may be used in external communications by Sightsavers and our partners, in your country, and internationally, and will be held securely in the Sightsavers image library.

Date: _____

Translator/field worker: "I confirm I have translated and/or explained the information above."

Signed: _____ Name: _____

Participant: "I understand the information above, and give my permission for my content to be collected and used as indicated below."

1) Participants/group's name: _____ **Age:** _____

2) I am [tick as appropriate]:

- Over 14 and I sign for myself
- Age 7-14 and I sign for myself, with my parent/guardian's consent
- A parent signing for a child under 14: My name is _____
- Signing for a group: My relationship to the group/job role is _____

3) I agree to a Sightsavers' representative [tick all that apply]:

- speaking to me and recording my words
- taking my photograph
- making a video

4) I agree to Sightsavers and partners using my [tick all that apply]:

- Story
- Voice audio
- Photos
- Video

5) I agree for my content to be used in [tick all that apply]:

- Newspapers
- The internet
- Social media
- Radio
- Television
- Publications/educational materials

6) In [tick all that apply]:

- My country
- Internationally, except the following country [if applicable] _____

7) Signature/thumbprint Participant: _____ Parent: _____

For field worker: Identifier/Description: _____