



# CHILD SAFEGUARDING POLICY



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## FOREWORD

Founded in 1991, Secours Islamique France (SIF) is a Non-Governmental Organisation devoted to national and international solidarity and working for a caring and fairer world in which the basic needs of vulnerable people are met, and their rights are fulfilled. SIF works to reduce poverty and vulnerability in France and throughout the world, without proselytism or discrimination. The organisation mobilises emergency relief and implements both development

programmes and advocacy activities, especially in favour of children. SIF draws inspiration from Islam's precepts of solidarity and respect for human dignity, which are the NGO's core values. In keeping with its commitment, values and missions, SIF calls for active solidarity with other human beings, regardless of borders and differences.

SIF is a private, faith-based institution whose activities are secular, since it does not carry out nor organise religious practices. It is not a religious or missionary organisation. SIF therefore provides universal assistance to people in need, regardless of their religion, gender or origin.

SIF has set up an Ethical Committee (ECo), which has an advisory rather than a decision-making role, to reflect on the direction its humanitarian action should take, to develop the discourse behind such action and to answer [ethical] questions. This Child Safeguarding Policy, which has been developed by SIF's multidisciplinary teams, reflects our ethical convictions and forms an integral part of our solidarity principles.

Islam contains many references to education, children, learning and encouragement to acquire knowledge and a trade. Mistreating children is forbidden, and extra care is recommended for girls as they are more vulnerable than boys. Of course, Islam did not invent universal moral values, but supplemented them.

We would like to clarify two points regarding child safeguarding ethics as they relate to some of our programmes. First, the use of violence as part of children's education, in the name of the Muslim religion. Second, begging by children, which is sometimes justified on religious grounds.

## VIOLENCE AGAINST CHILDREN

Coercion in any form - whether it be psychological or physical - is against the precepts of Islam on the education of children. It is a principle of humanity that the more vulnerable a person is, the greater our attention to that person must be. Childhood is therefore one of the most delicate periods in a person's life. Accompanying and educating children therefore requires great kindness. Any form of aggressive behaviour - whether physical or verbal - could leave scars for the rest of the child's life. Children's education should as a consequence be based on encouragement and engagement, rather than punishment, as per the Prophet of Islam's teachings that gentleness is stronger and more effective than brutality. Indeed, many scriptural sources call for kindness, magnanimity, goodness and charity. They strongly warn against harshness, violence, aggressiveness, etc. All Muslims seek to follow the Prophet's example: he never hit anyone, nor told to anybody any aggressive or humiliating words. He showed great indulgence, particularly with vulnerable people.

And yet certain words are ascribed to him that contradict these teachings, such as the use of physical violence to force a child to fulfil their daily obligation of five canonical prayers. This Hadith, allegedly ascribed to the Prophet, unfortunately circulates among many Muslims, despite the fact that it contradicts the rest of his recognised teachings from the Koran and the authentic Traditions of the Prophet; and that it goes against the Islamic principle by which a person only becomes responsible when he or she reaches adulthood, i.e. once they attain majority. A ten-year-old child cannot therefore be considered responsible, especially as another principle stipulates that being forced into religious practices has no spiritual value since they require free will. Accordingly, it is not surprising that this "hadith" is not authentic. This legitimisation of violence against children must not consequently be attributed to the Prophet.

Violence is also the most infallible method to put a child off any sort of schooling or learning for the rest of his or her life. And as we know all too well: a child who suffers from violence is more likely to exhibit violent behaviour with their family and social circle either before or when they become an adult, because violence sets off a chain reaction of more violence.

## BEGGING BY CHILDREN

Islam does not encourage begging. There is a significant difference between living in poverty with dignity and begging, particularly when a child is forced to beg. It can impact children's dignity, especially when they are not supposed to seek charity.

Childhood is a time for education, instruction, learning and play; not for work or labour, and definitely not for begging. This is backed up by the canon opinion that forbids and warns parents and guardians against forcing children to beg rather than teaching them a trade. Begging is not working and is definitely not a profession. In more modern terms, one could say that children must be provided with the necessary schooling to enable them to carry out an honourable trade once they reach adulthood.

# INTRODUCTION TO THE CSP

Secours Islamique France (SIF) has worked in France and over forty other countries - in particular in Africa, Asia and Europe - since its creation. Projects supporting children's rights have always been at the heart of the organisation's action. Historically, through the establishment of SIF's Orphan Sponsorship Programme, whose action includes offering scholarships to several thousand orphans each year, and today more broadly through SIF's other programmes for children.

**The implementation of a policy and procedures guaranteeing compliance with humanitarian principles**, including the "Do no harm" principle<sup>1</sup>, is essential, as is the quality of our actions. Thus, our Child Safeguarding Policy (CSP) serves on a daily basis to oversee our actions for the people we support.

This document is the product of a collaborative process involving all SIF Departments and Field Missions: International Programmes and Operations, Social Action in France, Human Resources, Communication and Development, Administration and Finance, Advocacy. They all have contributed their expertise and worked together to develop a policy, procedures and operational tools adapted to the organisation's daily missions, which address all known child safeguarding risks at different levels.

This policy is also based on the United Nations Convention on the Rights of the Child (UNCRC), the International Keeping Children Safe Standards<sup>2</sup>, as well as on shared experience with other organisations and consultation with child protection specialists and civil society partners.

The objective of the collaborative CSP conception process was twofold. First, to guarantee that existing challenges and risks are suitably addressed to ensure child protection. Second, to guarantee effective Policy implementation by all individuals and entities working for or on behalf of SIF<sup>3</sup> and its partners.

**This CSP demonstrates our commitment to child protection and safeguarding<sup>4</sup>**, in particular via procedures aimed at strengthening our preventive measures and our ability to manage incidents appropriately. The CSP also defines policy monitoring and evaluation measures designed to ensure its continuous improvement and compliance with the highest applicable standards.

We are convinced that systematic implementation of this CSP is one of the best ways of ensuring that all children's right to protection - without distinction or discrimination - is respected.

<sup>1</sup> Please see glossary.

<sup>2</sup> Keeping Children Safe. Child Protection Standards and Implementation. 2014.

<sup>3</sup> Employed staff, paid volunteers, interns, consultants, unpaid volunteers, interim workers, day workers.

<sup>4</sup> Please see the distinction between "safeguarding" and "protection" in the glossary.







## 1 OUR COMMITMENTS TO CHILD SAFEGUARDING AND PROTECTION

SIF condemns all forms of violence perpetrated against children and commits to guaranteeing children's protection and well-being, and on a broader scale, to respecting children's rights in all its activities.

SIF oversees all its actions in order to ensure that its interventions guarantee and promote children's rights, in accordance with the requirements of the **UNCRC** and other international and national laws on the rights and protection of children.

Children's best interests and well-being are at the heart of our concerns. In any conflict of interest, the needs and rights of the child are always paramount.

To fulfil its commitment, SIF implements a Child Safeguarding Policy (CSP) to ensure that the organisation "does no harm" to children and meets its child protection responsibilities. The CSP also aims to protect people working for or on SIF's behalf by raising their awareness and training them in expected practices and behaviours. Moreover, the CSP contributes to the protection of the organisation by affirming SIF's commitment to never harm children.

Indeed, poorly designed activities, deficient operational management or inappropriate behaviour on the part of individuals intervening for or on SIF's behalf (staff, paid volunteers, interns, unpaid

volunteers, consultants, interim or daily workers) may result in considerable risks of harm to children.

Therefore, in full recognition of its responsibility with regard to the protection and well-being of children, the organisation has created and implements a **Child Safeguarding Policy and procedures which apply to the organisation's activities and internal operational management, and to all individuals intervening for or on the organisation's behalf.**

The CSP defines prevention and response mechanisms for any form of violence, abuse, exploitation or neglect perpetrated towards children who are in contact with SIF or impacted by its activities. The objective of the CSP's prevention mechanisms is to manage known risks and to ensure that **all necessary measures are implemented** to prevent the organisation from bringing harm, in any way, upon a child with whom it is, directly or indirectly, in contact. If a child protection incident does occur, an adapted response is facilitated by case management processes and remedial actions designed to guarantee child protection in all circumstances.



SIF commits to respecting the right of all children to be protected and takes special care to protect children who may be more vulnerable as a result of discriminating factors<sup>5</sup>, in particular when such factors are likely to restrict their access to assistance. No child should come to any harm, intentionally or unintentionally, as a result of being associated or in contact with SIF (by participating in a project, event, or in a fundraising or advocacy campaign). SIF recognises that types of risks and risk mitigation measures can vary significantly from one child to another.

**The safeguarding measures within SIF's CSP can be adapted to the culture and context.** However, levels of protection must never be reduced, and cultural specificity can never justify abuse or violence.

All individuals are responsible for child safeguarding. SIF therefore ensures that all individuals involved in its activities and all targeted communities are aware of the CSP, receive the support required to understand their roles and responsibilities and are able to report any failure in implemented safeguarding mechanisms. Ultimate responsibility for ensuring child protection lies with SIF's executive management.

SIF is mindful that all individuals within the organisation, as well as anyone representing or working with the organisation, is committed to preventing any harm to children, both in the course of their professional duties and elsewhere.

In compliance with the principles of neutrality and independence, SIF takes seriously all whistleblowing and incident reports<sup>6</sup> relating to child safeguarding, and commits to taking all necessary measures, in accordance with applicable regulations, towards all parties, partners or visitors that are suspected of or have committed an abusive act against a child.

SIF applies a strict confidentiality policy to data and does not disclose sensitive personal data relating to a child or to any individual involved in a case of abuse, unless data disclosure to competent bodies is necessary or compulsory to ensure the child's protection.

**Fully aware that there are very real risks of abuse against children, SIF commits to continuously promoting and improving its CSP** via accountability mechanisms based upon transparency and participation. All individuals working for or with SIF, and all people in contact with SIF, including children, can express their concerns regarding the implementation of the Policy, and suggest ways to strengthen prevention and response mechanisms.

SIF also promotes the participation of children and communities in child safeguarding and protection mechanisms, so that they are fully aware of their rights and can report any violation of these rights or of the CSP. Children are encouraged to express their opinions, which must be acted upon according to their age and level of maturity. In this way, SIF supports children's development and self-fulfilment, including via CSP implementation.

<sup>5</sup> Such as age, gender, sexual orientation, sexual identity, physical appearance, belonging or not belonging to an ethnic group, religion or nation, language, health status, family situation including the family's financial situation, family name, customs, political opinions or trade union activities, or any other situation pertaining to the child or to the child's caregivers or legal guardians.

<sup>6</sup> Please see glossary.





## III. PREVENTION MECHANISMS

### A. HUMAN RESOURCES

#### 1. Overview of Child Safeguarding Roles and Responsibilities

All individuals in contact with children have a role to play in their protection. The CSP **applies to all individuals working for or with SIF**, whatever their status. All intervening individuals<sup>7</sup> must therefore first agree to the Policy's terms and conditions.

To reduce the risk of any harm to children from within the organisation, deliberately or through ignorance of what constitutes abusive behaviour, SIF makes it clear that no form of abusive treatment of children will be tolerated from individuals working for or with the NGO, partners included. This is done through its Code of Conduct, recruitment procedures, training modules and internal communications.

**Salaried staff, paid volunteers, interns, unpaid volunteers, consultants, interim workers, day workers and Board of Trustee members are required to sign and adhere to the Code of Conduct, and its child safeguarding provisions.**

SIF's Code of Conduct specifies which adult behaviours towards children are considered acceptable and which are considered

unacceptable. SIF's employment contracts include a commitment clause to respect the CSP. Unpaid volunteers must sign SIF's Volunteering Convention and respect the "Volunteers' Guide of Good Conduct with Children". SIF staff are responsible for ensuring that unpaid volunteers are appropriately supervised at all times.

**A breach of the CSP and/or Code of Conduct is likely to lead to suspension and/or termination of any type of cooperation, and may result in case referral to the competent authorities.** Decisions are made on a case-by-case basis, in observation of applicable employment laws and conditions, as well as the right to protection of privacy.

The CSP holds all individuals intervening for or on SIF's behalf accountable for behaving in a way that ensures the safety of all children with whom they come into contact, whenever they are working or acting under the organisation's responsibility. However, these individuals may represent or be identified with the organisation in any situation. Therefore, any breach of the CSP and/or Code of Conduct beyond the working environment is liable to be scrutinised by the organisation. If damage is caused to the organisation, disciplinary measures may be taken. Measures will always take the greatest possible account of the child's best interests and the intervening party's contractual commitments.

<sup>7</sup> Board of Trustee members, salaried staff (national and international, permanent or short-term), paid volunteers, consultants, interns, unpaid volunteers, interim workers, day workers, partners, service providers, suppliers and vendors.

## 2. Specific Roles and Responsibilities: Child Safeguarding Focal Points

SIF has also designated key staff members, with specific and clearly defined child safeguarding roles and responsibilities, at every level of the organisation.

SIF's Education and Well Being of the Child (EWBC)<sup>8</sup> Technical Adviser has been designated Child Safeguarding Adviser at Head Office. The Child Safeguarding (CS) Adviser is responsible for ensuring organisation-wide integration of child safeguarding measures and is the organisation's primary contact person on these matters. At head office, the CS Adviser is also supported by an EWBC / Child Safeguarding Project Manager. The CS Adviser and Project Manager can be reached using this email address: [childsafes@secours-islamique.org](mailto:childsafes@secours-islamique.org).

They are also supported by at least two **Child Safeguarding Focal Points**, appointed within each mission (both in France and internationally), one of whom must be a woman. These Focal Points are responsible for providing advice and support to staff and other SIF collaborators on day-to-day CSP Policy and procedure implementation, with technical support from the Child Safeguarding Adviser and Project Manager at Head Office. As far as possible, an individual with experience in child protection is appointed as Focal Point. If this is not possible, the role may be assigned to any person who is committed to respecting children's rights and safeguarding children, and who is deemed legitimate by his or her colleagues<sup>9</sup>. The Focal Point must receive appropriate training (listening skills, psychological first aid, etc.).

However, ultimate responsibility for child safeguarding in the field lies with the Head of Mission (abroad), and SIF's Executive Director (ED) in France. Therefore, if the CSP or procedures are not respected by an individual working for SIF, the Head of Mission or the ED will be held responsible, provided that he or she was aware of such misconduct and did not take the immediate and necessary measures provided for in the procedures.

## 3. Safer Staff and Unpaid Volunteer Recruitment

SIF has rigorous recruitment procedures in place in order to significantly reduce the risk of hiring anyone susceptible of posing a threat to children.

Staff and unpaid volunteer selection procedures, at national and international levels, aim to exclude suspicious individuals in the first stages of recruitment.

These procedures are based primarily on the analysis of each position/mission, which involves a precise description of the person's role and level of contact with children. They also comprise pre-selection, selection and integration phases that include robust child safeguarding measures to ensure maximum levels of security<sup>10</sup>.

In addition, a trial or probationary period (during internship, if applicable) is systematically integrated for salaried staff. Staff whose position involves high levels of child safeguarding risk must undergo reinforced supervision. Their behaviour towards children must be considered in trial period evaluations, as well as in performance evaluations.

## 4. Capacity-Building, Training, Consulting and Assistance

All staff members, unpaid volunteers and partners must be made aware of the CSP, within no more than 3 months of signing their contract. They must possess the necessary knowledge and skills to fulfil their responsibilities and obligations, ensure child protection, prevent risk and take appropriate action in the event of an incident.

In addition, staff (in particular Child Safeguarding Focal Points) and unpaid volunteers with specific roles, all individuals whose mission involves a high level of contact with children, and all individuals involved in EWBC programmes, must receive additional training on the protection and well-being of children (e.g. identifying child victims of violence, psychological first aid, case referral, etc.). Training content must be adapted to the person's role and responsibilities, nature of work (e.g. type and frequency of contact with children and/or with personal data) and previous experience.

Staff and unpaid volunteers must participate in CSP awareness-raising and training sessions on an ongoing basis. All these sessions must be documented<sup>11</sup> and archived in HR files.

To help implement the CSP - especially if a problem or incident occurs - staff members and unpaid volunteers have access to advice and assistance, which are provided by the Child Safeguarding Focal Points in the first instance. The Focal Points must therefore be capable of identifying the services available to assist children. As SIF Heads of Mission and Head Office Department Directors are responsible for CSP implementation, they must also provide support if necessary. All requests for support must be taken seriously and must never be considered as indicating a lack of knowledge or skill. Any individual working for or with SIF who is involved in a child protection incident - either as the object of an investigation or as a witness - shall be provided with appropriate assistance, such as psychological support or reinforced supervision.

<sup>8</sup> To make this document easier to read, all nouns, adjectives, pronouns or other words that have a feminine, masculine or plural form will be written in the most appropriate form to the sentence in which they occur.

All nouns, adjectives, pronouns or other words should nevertheless be taken to include all genders and any number of people.

<sup>9</sup> Guidelines on the role and responsibilities of the Child Safeguarding Focal Point (CSFP).

<sup>10</sup> Please see HR recruitment procedures.

<sup>11</sup> Including attendance registers, signed and dated by all participants.

## 5. Collaboration with Contractual<sup>12</sup> and Non-contractual Partners

When choosing operational partners for activities involving contact with children, these potential partners' compatibility and work experiences with children must be considered. One must always check whether partners have their own CSP or, at least, child safeguarding measures consistent with SIF's measures.

**In any partnership relationship, a child safeguarding risk assessment must be carried out. This assessment must include risk mitigation measures, and these measures must always be monitored. Special provisions addressing child safeguarding measures must appear in all partnership agreements.**

If SIF has a say in contract terms<sup>13</sup>, contracts must state each party's commitment in matters relating to child protection and safeguarding. Contracts must also address the question of how SIF and its partner will assist each other to ensure compliance with child safeguarding measures. Agreements must clearly define child safeguarding incident reporting and response measures (in particular, the required reporting procedure between partners, potential impacts of an incident on the partnership agreement, etc.). Whatever the precise contractual situation, SIF applies a Ranking Process to expected partner commitment as follows:

1. Partners in (direct or indirect) contact with children must make a commitment to respect the CSP in their contract. They must also sign the Code of Conduct.
2. Partners with no contact with children must at least sign the Code of Conduct.

In exceptional cases in which a partner may not be able to immediately commit to respecting SIF's Code of Conduct, a partnership agreement may nevertheless be signed. In this agreement, the partner must commit to complying with the Code of Conduct or, at least, to reinforcing its own child safeguarding measures, within a given time period that is inferior to the partnership agreement duration (including support from SIF). **In this case, it is imperative that the Head Office Child Safeguarding Adviser validates the agreement.**

**In addition, all of SIF's contractual partners must have access to the CSP and participate in awareness-raising or training sessions on child safeguarding measures. These measures shall be determined locally according to known risks, to clarify the partners' child safeguarding responsibilities. If necessary, contractual partners must be provided with policy implementation support. During the partnership, an internal assessment of the partner's contact with and impact upon children shall be carried out.**

Non-contractual partners (e.g. community actors, local public bodies) can also be made aware of child safeguarding in order to positively influence their practices. **SIF can also support partner organisations in developing minimum child safeguarding measures tailored to the partner organisation and its activities.**

In this way, SIF contributes to promoting and developing child safeguarding norms and standards locally and, as far as possible, to their implementation, by providing resources and technical expertise.

**In the event of suspected maltreatment of a child by a partner, SIF may report the facts to the competent authorities, with due consideration for local context and the applicable legal framework<sup>14</sup>.**

SIF may also suspend or terminate the partnership, or withdraw its support, including financial support, in particular if the incident is not managed correctly. Whether the partnership continues will depend on the facts, as well as the partner's response and involvement in managing the incident and implementing solutions (requesting support, following advice, upholding the child's best interests, etc.).

## 6. SIF Project Visitors

Individuals from outside SIF interventions may visit a project or participate in an activity provided they have obtained **explicit authorisation** from the concerned Head of Mission or Department Director and have understood and accepted the terms and conditions of the "Volunteer and Visitor Guide of Good Conduct with Children".

**SIF staff are responsible for ensuring that all visitors have been made aware of the CSP and are supervised throughout their visit.** This means that visitors must be accompanied at all times and never be left alone with children.

<sup>12</sup> Including service providers, vendors and suppliers.

<sup>13</sup> If SIF has no say in contract terms, the organisation must still take action to ensure that child safeguarding is mentioned in the partnership agreement.

<sup>14</sup> Example: A case might not be reported to authorities in exceptional duly documented circumstances, in particular if the local system does not allow for reporting and/or if reporting might put the child victim and/or his or her relatives/close social circle in danger.



## B. DATA MANAGEMENT<sup>15</sup>

Specific measures must be taken for the processing<sup>16</sup> of children's data, in particular for personal data and sensitive protection data.

### 1. General principles relating to the management of children's data

**All recent information required for child rights protection programming must be collected, used, shared, retained and destroyed in full compliance with international child protection principles** - in particular, the principles of confidentiality, "doing no harm" and the child's best interests - and with established information protection and sharing protocols.

Any processing of children's data must pursue clearly defined and specific objectives in favour of children. Information must never be collected simply because it is "good to know".

**In addition, SIF staff must assess risks at each stage of data collection and processing, in order to prevent and minimise potentially harmful impacts, in particular on children.** SIF must also avoid duplicating data collection operations, by always first seeking to obtain the information already available, in order to spare children and other persons concerned any additional inconvenience and unnecessary risks. It is also essential not to raise false hopes during data collection by making promises of assistance which cannot be kept. Children's data must be processed in an objective, impartial and transparent manner, in order to prevent or minimise the risk of bias and discrimination.

SIF staff must also continuously monitor the way in which children's data is collected and processed using operational monitoring-evaluation processes (including feedback and complaint mechanisms), in order to swiftly identify any risk of harm and take appropriate measures.

### 2. Additional Measures Applicable to Personal and/or Sensitive Data

SIF staff must process children's personal data and/or sensitive protection data in accordance with the rules and principles of international law and applicable regional<sup>17</sup> and national legislation.

**Each mission must develop and implement formal procedures for the management of this data. These procedures must be adapted to local contexts, and abide by data access rights, data use responsibilities and security rules.**

The individuals who will be managing the data must be trained in the basics of data protection and use the appropriate systems and protocols.

**Personal data processing is only authorised if it is based on a legal basis and/or legitimate interest**, and if the child's legal guardian(s) has indicated his or her freely given, specific, informed and unambiguous indication of consent<sup>18</sup>. In the absence of such consent, data processing is still possible if it is necessary to safeguard the child's vital interests<sup>19</sup> or to achieve a legitimate interest pursued by SIF. The child's agreement is also necessary, whenever possible.

**SIF staff must process personal and/or sensitive data with the appropriate level of security.** Paper-based data must be stored in locked office furniture exclusively reserved for this use. Electronic data must be password-protected, pseudonymised and/or encrypted, or anonymised if name(s) no longer serve a recognised purpose.

Information sharing protocols must be drawn up between all partners of any project involving management of personal and/or sensitive data. SIF continues to take full responsibility if information collection or processing is subcontracted, including to its partners, and therefore must ensure compliance with applicable standards. A minimum amount of data must be retained for a pre-defined, minimum duration. An emergency personal and/or sensitive data removal plan must be prepared in order to guarantee confidentiality in the event of evacuation or other force majeure incidents.

## C. PROJECT MANAGEMENT<sup>20</sup>

**Implementing the CSP is essential in all stages of project management, including for projects that are unrelated to children.** SIF works with the Minimum Standards for Child Protection in Humanitarian Action<sup>21</sup>.

**Contextual analysis, in particular of existing child protection systems (legal mechanisms, social services, etc.) and a child safeguarding risk assessment must be carried out beforehand and updated, if necessary, during project implementation (using the "Risk Assessment Grid").**

<sup>15</sup> For further information, please see the Guidance note on children's data management.

<sup>16</sup> Data processing: Any operations performed on personal data, such as collection, use, correction, sharing, retention, archiving, disposal, etc.

<sup>17</sup> In particular, the European General Data Protection Regulation (GDPR).

<sup>18</sup> Please see glossary.

<sup>19</sup> Protect the life, physical or mental integrity, health, dignity or safety of the individual concerned.

<sup>20</sup> For further information, please see the Guidance Note on Child-safe Project Management.

<sup>21</sup> The Alliance. Minimum Standards for Child Protection in Humanitarian Action. 2019.

This process must identify all the risks potentially faced by children (especially the most vulnerable) as a result of the planned activities, as well as the measures required to manage these risks. This risk assessment shall be carried out if possible in collaboration with partners and communities, including children, and will confirm whether the project or activity is feasible or not. In addition, the “Child-safe Project/Activity Checklist” makes it possible to verify that measures are taken to ensure the secure management of any project/activity.

For example, since SIF is aware of the risks generated by the placement of children in institutions and support for such institutions, the NGO is committed, through its extensive Sponsorship Programme, to supporting only orphaned children and young people living in families and not in orphanages. While enabling these children to remain with their family, SIF contributes to the realisation of their basic rights, in particular their rights to protection and education.

**Caregivers/legal guardians must give prior consent in order for children to participate/be involved in any activity organised by SIF.**

Children’s participation must respect the following principles:

- Participation must always be relevant and meaningful for the child;
- It must be voluntary and informed;
- It must cause no harm to the child;
- It must be inclusive and accessible to all children.

Participation processes are implemented and assessed by trained and competent personnel<sup>23</sup>.

The monitoring and evaluation of interventions, risk reduction measures and corrective actions is also essential to the application of the CSP.

In the field, a number of individuals are responsible for child-safe projects:

- At the programmatic level, the Project Manager, Programme Coordinator - or Territorial Supervisor (in France) - and Head of Mission are primarily responsible for child-safe project management, for all projects, including those unrelated to children. They guarantee compliance with the CSP and its procedures, as well as the correct use of related tools.
- At the technical level, the Child Safeguarding Focal points assist staff and other intervening parties in the daily implementation of the CSP and its procedures. To achieve this, Child Safeguarding Focal points offer awareness-raising and training sessions. They can also support project teams by mobilising their network of contacts with local child protection, social welfare, health and legal professionals, etc., in particular to provide an appropriate response to cases of child abuse.

## D. COMMUNICATION, MEDIA AND ADVOCACY<sup>24</sup>

### 1. Terms, Conditions and Ethical Rules

SIF commits to not causing any harm to children and to ensuring that its official communication and advocacy activities consider children’s best interests. It also commits to raising staff, partner and visitor awareness (including private and institutional donors and the media) on the rules of ethical communication.

#### Consent

- Before taking a photograph or video of a child (or group of children), obtain the written authorisation of the legal guardians, and if possible, the child’s agreement. Both the objective and intended use of the photograph/video/testimony must be explained to the child (or children) and to the legal guardians. If they refuse, they must not be pressured in any way.

#### Preserving child safety

- Assess potential risks (e.g. reprisals, stigmatisation, rejection, legal proceedings) for the child, his or her family and/or other members of the community before taking any photographs or videos.
- Guarantee the child’s safety during the photo/video shoot, for example by ensuring that the location is not dangerous for the child and, if necessary, that the contracted service provider (e.g. photographer) is systematically accompanied by a SIF representative.
- Choose the visual background carefully. Ensure that the child’s home, community and location are not identifiable, in order to avoid placing the child in any danger.
- Never communicate any of the child’s personal data, such as the child’s name or any other information that would enable the child to be identified or located. Never include personal indications on the supporting medium.
- Protect all photographs and videos during each processing stage.
- Use SIF’s own distribution channels to publish media intended for public use.

#### Preserving child dignity

- Ensure that photographic and video materials represent the child in a way that is dignified, respectable and non-compromising (including sexually).
- Do not take or publish photographs or videos that show children naked or barely dressed.
- Do not take or publish any shocking images of children (e.g. badly wounded or injured children).
- When taking photographs and videos, place yourself at the level of the child, if possible, to avoid any form of “superiority”.

<sup>22</sup> Or exceptionally, if there are no parents/legal guardians, individuals responsible for providing for their needs.

<sup>23</sup> International Bureau for Children’s Rights. Guidelines for the Participation of Children in the IBCR’s Project Management and Programmes [online]. March 2018. Available at: [http://www.ibcr.org/wp-content/uploads/2018/06/Lignes-directrices-participation-AN\\_WEB.pdf](http://www.ibcr.org/wp-content/uploads/2018/06/Lignes-directrices-participation-AN_WEB.pdf)

<sup>24</sup> For further information, please see the Guidance Note on Communication, Media and Advocacy.

- Avoid miserabilism of any kind. Seek to elicit a positive reaction from the target audience (e.g. hope, support) despite the difficult context portrayed by the chosen medium.

#### The child's environment

- Avoid attitudes and comments that are judgemental or insensitive to cultural values and social norms, or that might bring humiliation upon a child.
- Make sure that the context is portrayed as faithfully as possible using the chosen medium.

#### Collecting testimony

- Be mindful of how children are consulted, in particular (but not only) by limiting the number of interviewers and ensuring that they communicate in a child-friendly way.
- Avoid setting the scene in any way (this includes not asking a child to tell a story other than his or her own for communication purposes).
- Ensure that the child feels comfortable and is able to tell his or her story with no external pressure, including from the interviewer.
- Avoid attitudes and comments that might reactivate a child's pain and grief after traumatic events.

## 2. Information Technology (IT) and (non-IT) Technology Management

SIF has its own rules for information technology (IT) and (non-IT) technology management<sup>25</sup>. **The use of communication tools provided by SIF to its staff for the performance of their professional duties is subject to the CSP and to the rules governing the CSP.**

Deliberate access to websites, beyond the context of professional child protection work, in violation of the CSP and harmful to SIF's reputation, is totally prohibited and may lead to disciplinary measures, such as employment contract termination. **Therefore, in order to avoid misunderstanding, unintentional access to harmful data must be reported to hierarchical managers immediately.**

SIF respects individuals' right to protection of privacy. However, in exceptional situations, SIF reserves the right to access private files if its Code of Conduct is seriously violated (e.g. if it is suspected that information and communication technology tools have been used to access child pornography)<sup>26</sup>.

## 3. Online Communication via Social Media

Social media represent increasing risks for children, and all individuals working with or on SIF's behalf must be aware of this fact. In particular, it is essential to ensure that children's anonymity is respected in all instances of online communication. Respecting anonymity is even more critical in sensitive contexts in which the widespread dissemination of a child's identity or other personal information might put them in danger.

## 4. Advocacy

SIF advocates for children's rights, in particular children's rights to education and protection. The purpose of child-centred advocacy is to uphold children's interests and to give children a voice (through stories, testimonies, and even children's direct participation in advocacy activities).

For any advocacy initiative, a risk assessment and specific risk management measures are necessary in order to ensure that children are protected and supported. For all collectively led actions, during which children participate via partner structures, SIF ensures that the accompanying organisations' safeguarding policies and measures are in line with its own policy.

**SIF cannot speak on behalf of children or involve children directly in any activities without the freely given and informed consent of their legal guardian(s). The child's agreement is also necessary, whenever possible.** In any form of verbal communication with children, simple and suitable language must be used, such that, in particular, children are able to understand the objective and the repercussions of their participation. Participation must always be relevant and meaningful for the child. SIF commits not to involve children in a symbolic or "decorative" way, nor to manipulate their speech, nor to attempt to modify or influence their contributions.

Participation must cause no harm to the child, and the child's anonymity must be protected<sup>27</sup>. The participation process must be implemented and evaluated rigorously by competent trained staff.

<sup>25</sup> Please see SIF's Information Technology Charter.

<sup>26</sup> For further details, please contact the Human Resources Department. Local legislation must always be respected.

<sup>27</sup> Only the child's first name, and not his or her family name, may be disclosed.





## III. REMEDIAL ACTION: INCIDENT MANAGEMENT

### A. INCIDENT REPORTING

According to SIF's Incident Reporting Procedure<sup>28</sup>, any person, who is a victim of or witness to individual abusive behaviour on the part of a person working for or on SIF's behalf (e.g. a partner) must immediately inform SIF of this behaviour. If the incident involves a SIF staff member, this must be done using appropriate line-management channels. If not, the following channels must be used: [stop@secours-islamique.org](mailto:stop@secours-islamique.org) or the dedicated telephone line (international: +33 (0) 7 61 34 11 65 or the local line).

However, in some cases, the above incident reporting channels may not be appropriate. **Missions must therefore also develop a locally adapted Incident Reporting Procedure, clearly specifying which other reporting channels may be used and any specific modalities** (e.g. complaint box, community mechanism). As local Incident Reporting Procedures are embedded into local systems, they must consider local law, the local authorities and local services to which incident reports must be addressed, and the local organisations that can provide appropriate assistance if necessary. Local staff and community members, including children, must be involved in the creation of this Incident Reporting Procedure so that they feel comfortable with it, or they will not use it.

Adequate measures must always be taken to ensure that children and their families are not exposed to greater risks or made more vulnerable as a result of incident reporting. Therefore, if official authorities are unable to ensure a child's protection, an incident can be reported to other organisations that are capable of handling the case appropriately (e.g. a child protection NGO). The Incident Reporting Procedure must be widely communicated to ensure that everyone knows exactly what to do.

When an incident report is received via the [stop@secours-islamique.org](mailto:stop@secours-islamique.org) email address, or via the international telephone line, the situation is first examined at Head Office, in accordance with the conditions defined in SIF's Incident Reporting Procedure.

When the incident report is received through the local telephone line or through another locally implemented reporting procedure, it is examined by the Child Safeguarding Focal Point. The CSFP first determines if immediate action is required to ensure the child's safety. To decide how to manage the case, he or she then determines whether the incident stems from an external situation or is internal to the organisation. **All reports concerning the abusive treatment of a child must be taken seriously and the child's security must always be the primary consideration.** The Child Safeguarding Focal Point ensures child safety and support throughout the entire procedure.

<sup>28</sup> SIF-specific Abusive Individual Behaviour Reporting Procedure.

## B. Case management

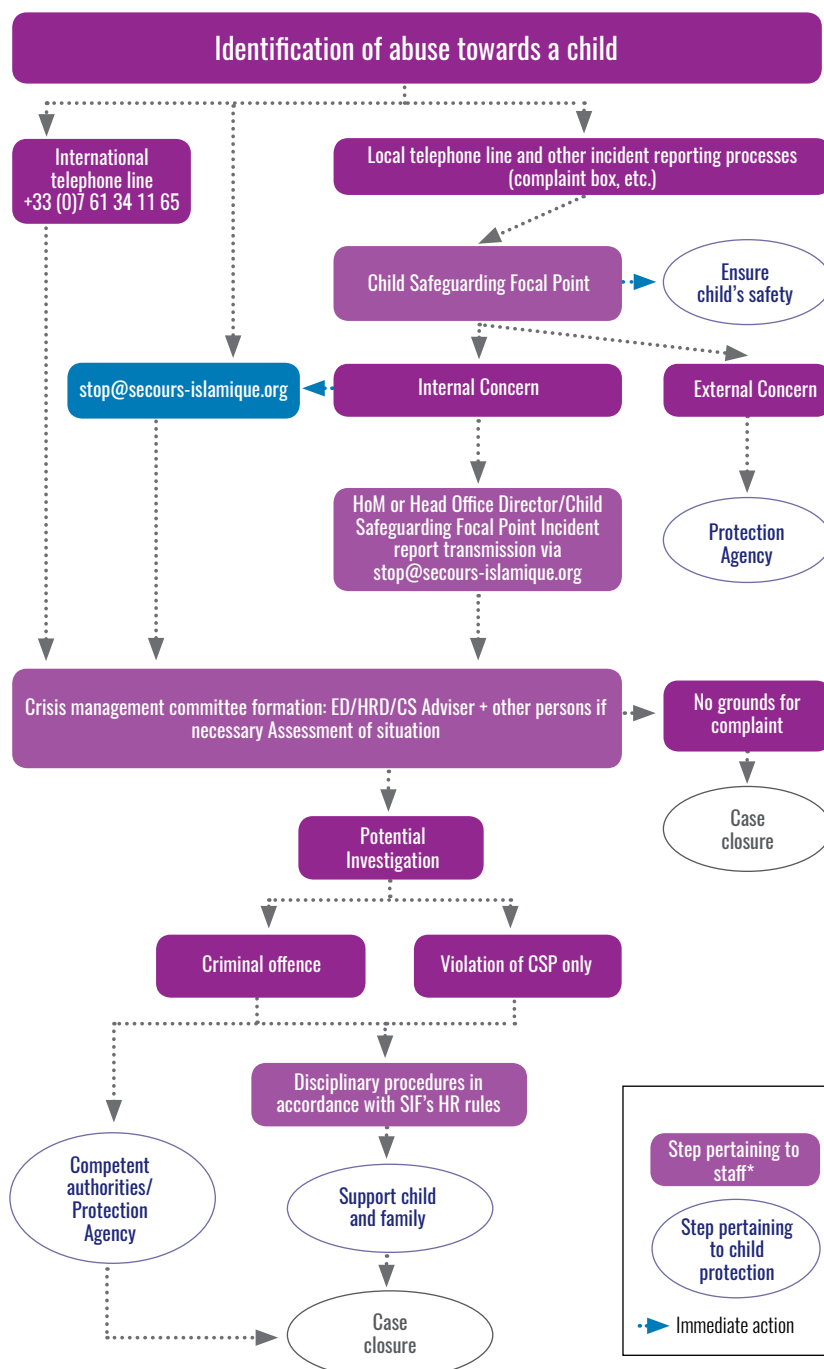
### External incidents

If the suspected or proven child abuse was perpetrated by a member of the child's family or community, and is not ascribable to SIF activities, staff or partners, the case does not fall within the scope of the CSP. However, SIF has to report any suspected or proven child abuse potentially endangering the child to competent authorities. Such incidents can then be managed locally and addressed by the Child Safeguarding Focal Point, with the support of the Child Safeguarding Adviser at Head Office, if necessary.

### Internal incidents<sup>29</sup>

The course of action to follow when the incident report concerns CSP non-compliance, and in particular any child protection incident involving an individual working for or on SIF's behalf (staff member, paid volunteer, consultant, unpaid volunteer, etc.), or a partner or visitor, is described precisely in SIF's Incident Reporting Procedure. This Incident Reporting Procedure is presented in the following diagram.

### Incident Reporting and Case Management Procedure



(\*) All individuals involved in abuse must be excluded from the process

<sup>29</sup> In compliance with French Decree N° 2017-564 of April 19, 2017 relating to procedures for the collection of reports from whistleblowers.



## IV. CSP IMPLEMENTATION, MONITORING AND EVALUATION

### A. CSP IMPLEMENTATION PLAN

#### 1. Distribution of CSP implementation responsibilities

SIF's Executive Director is responsible for the CSP on a general institutional level. Head Office and Missions are responsible for CSP implementation. Responsibilities may be represented as follows:

| All staff   | "Key" project staff (Project Managers, etc)  | Child Safeguarding Technical Adviser and CS Focal Point (Head Office and Missions)   | Directors (at Head Office) and Heads of Mission   |
|---|--|--|---|
| <ul style="list-style-type: none"> <li>• Respect CSP, its procedures and Code of Conduct</li> <li>• Limit and prevent risks and abuse against children</li> <li>• Report any abuse perpetrated upon a child</li> <li>• Share and encourage open communication about child safeguarding issues</li> <li>• Promote good practices and call into question bad practices</li> </ul> | <ul style="list-style-type: none"> <li>• Ensure that all staff is fully aware of CSP</li> <li>• Assess risks generated by activities potentially impacting children and take remedial action</li> <li>• Ensure that projects respect communication rules, information technology (IT) and (non-IT) technology management rules and data management rules</li> <li>• Ensure that partners satisfy CSP requirements</li> </ul> | <ul style="list-style-type: none"> <li>• Develop an Annual Action Plan to ensure continuous and improved CSP application</li> <li>• Raise awareness/train and advise intervening parties to enable continuous CSP implementation</li> <li>• Process Child Safeguarding incident reports</li> <li>• Assess the evaluation of the CSP implementation</li> <li>• And in addition, for Focal Point: <ul style="list-style-type: none"> <li>&gt; Ensure children and communities can access and are aware of CSP</li> <li>&gt; Develop a network of contacts able to participate in CSP implementation</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>• Ensure CSP implementation for all activities within their field of responsibility (for Directors) or conducted by their mission (for Heads of Mission)</li> <li>• Ensure that budget is specifically allocated to CSP implementation</li> <li>• Ensure Code of Conduct is respected</li> <li>• Implement Incident Reporting and Case Management Procedure</li> </ul> |



Each Department/Mission develops and implements an Annual Action Plan to ensure the compliance of its own strategy, procedures and practices with the Child Safeguarding Policy and procedures. Human and financial resources are made available to support the development and implementation of child safeguarding measures.

## 2. Stakeholder Awareness-raising Plan

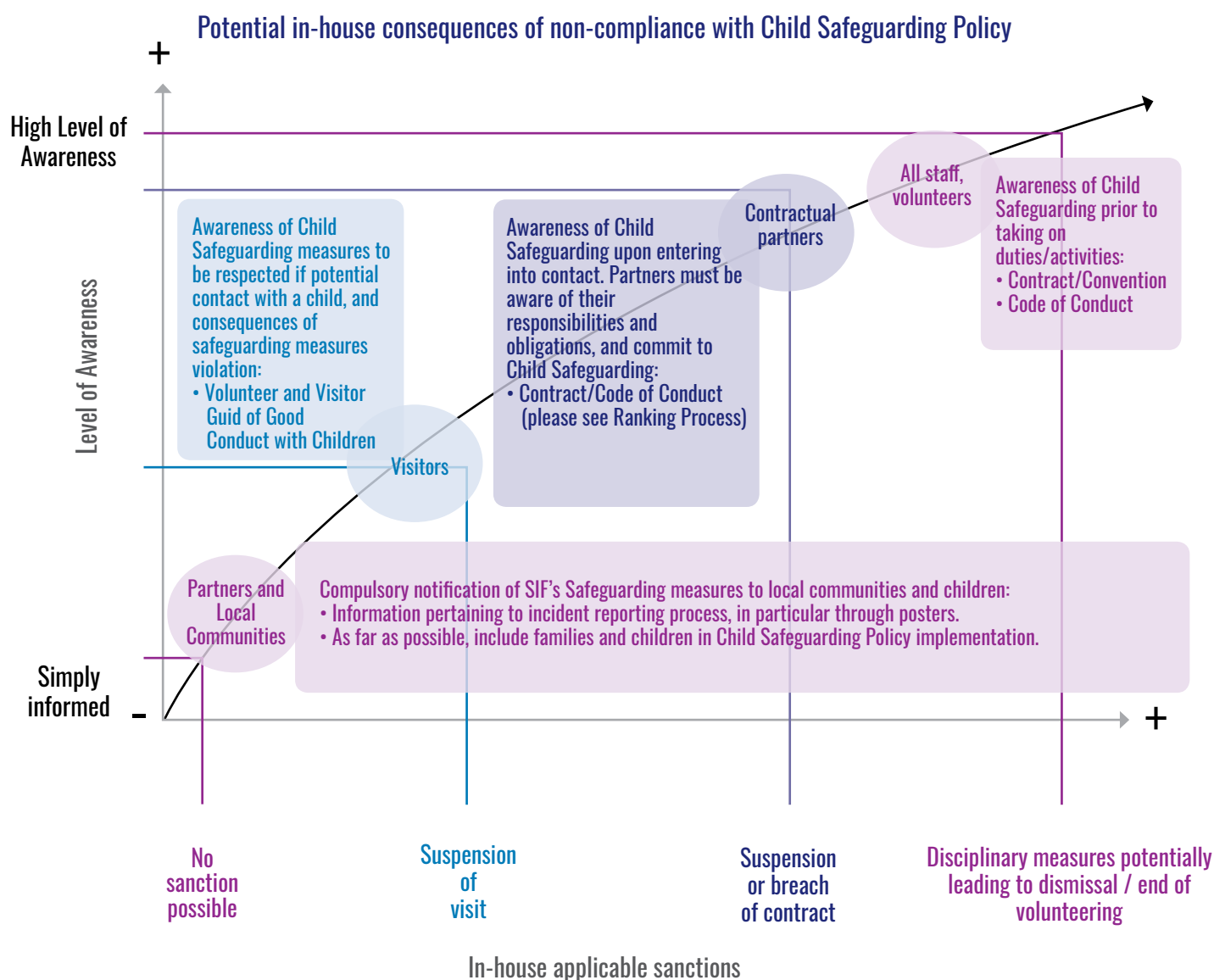
The CSP is made public, in particular via the SIF website. It is also brought to the attention of and made available to all stakeholders.

Head Office and missions develop their own Awareness-raising Plans to ensure proper CSP implementation. Thus, SIF ensures that all intervening parties and stakeholders, including communities, are informed of the CSP's existence, and of the Incident Reporting Procedures to follow in the event of an incident/child abuse. Children are also informed of their right to be protected from all forms of abuse and made aware of the existence of SIF's CSP. Just like their caregivers/legal guardians, children must

know who to contact if they need help, and how to get advice and support from SIF if they need it.

To ensure that information is both accessible to everybody and appropriate, the specific modalities of each mission's Awareness-raising Plan are developed locally and adapted to the context and the assessed risk level for children. If necessary, the CSP is translated into local languages.

Context-specific documents and media must also be created and made available. Stakeholders and contractual partners must have access to the CSP and its procedures. Unpaid volunteers and visitors must be provided with a "Volunteer and Visitor Guide of Good Conduct with Children". The Guide must define expected behaviour to ensure that no child is ever harmed. Finally, the awareness of local communities, including children, can be raised during discussions with SIF staff, as well as through posters that affirm children's right to protection and describe the Incident Reporting Procedure.



### 3. Adaptation of CSP Procedures to Context and Community Participation

**CSP implementation requires that certain procedures be clarified and adapted to the local context before use.** This ensures that the CSP is successfully applied, that effective awareness-raising is carried out, and that the Incident Reporting Procedure is used appropriately, if and when required.

However, this adaptation of procedures does not on any account mean dispensing with minimum child protection and safeguarding standards. Rather, the objective is to prevent counterproductive reactions.

As a humanitarian NGO, it is SIF's duty to listen to local populations, including children, and to involve them, to the greatest extent possible, in the development and implementation of all measures impacting them directly. Thus, certain individuals can relay the Policy within their community (e.g. by participating in a Child Protection and Safeguarding Committee).

Such individuals can contribute to the definition of relevant and effective Policy implementation mechanisms, such as (child harm or abuse) incident reporting mechanisms. These individuals can also contribute to child safeguarding awareness-raising (including raising awareness of Policy implementation mechanisms), incident identification and reporting, case management and monitoring of affected children. Participation of these individuals in CSP monitoring and evaluation is also recommended.

## B. MONITORING-EVALUATION AND IMPROVEMENT

**To ensure CSP relevance and effectiveness, SIF has a certain number of mechanisms in place to regularly monitor and evaluate the Policy, procedures and practices.** These mechanisms include the transmission of feedback, complaints and suggestions from the field to each mission, then on to Head Office. **All stakeholders must be able to contribute** (intervening parties, partners, local communities, children, etc.).

**Missions must have inclusive and locally adapted feedback mechanisms in place in the field.** These include permanent processes enabling continuous collection of feedback on the CSP (e.g. suggestion box) and occasional processes to carry out mission Monitoring-Evaluation Plans (e.g. field monitoring visits, focus groups, workshops).

**All feedback from the field is first handled by the Child Safeguarding Focal Point, who takes immediate action to ensure child safety if necessary.** Feedback is also integrated into the

annual report prepared by the Child Safeguarding Focal Point and transmitted to the Child Safeguarding Adviser. This annual report evaluates CSP implementation by the mission and makes recommendations for CSP improvement, drawing upon the experiences and practical cases encountered.

External and/or independent bodies, such as the Board of Trustees and the Assessment and Control Commission ("COMEC"), are also called upon to monitor the organisation's performance in terms of child safeguarding and report to executive management.

Based upon all this feedback, the **Child Safeguarding Adviser** proposes amendments to the CSP:

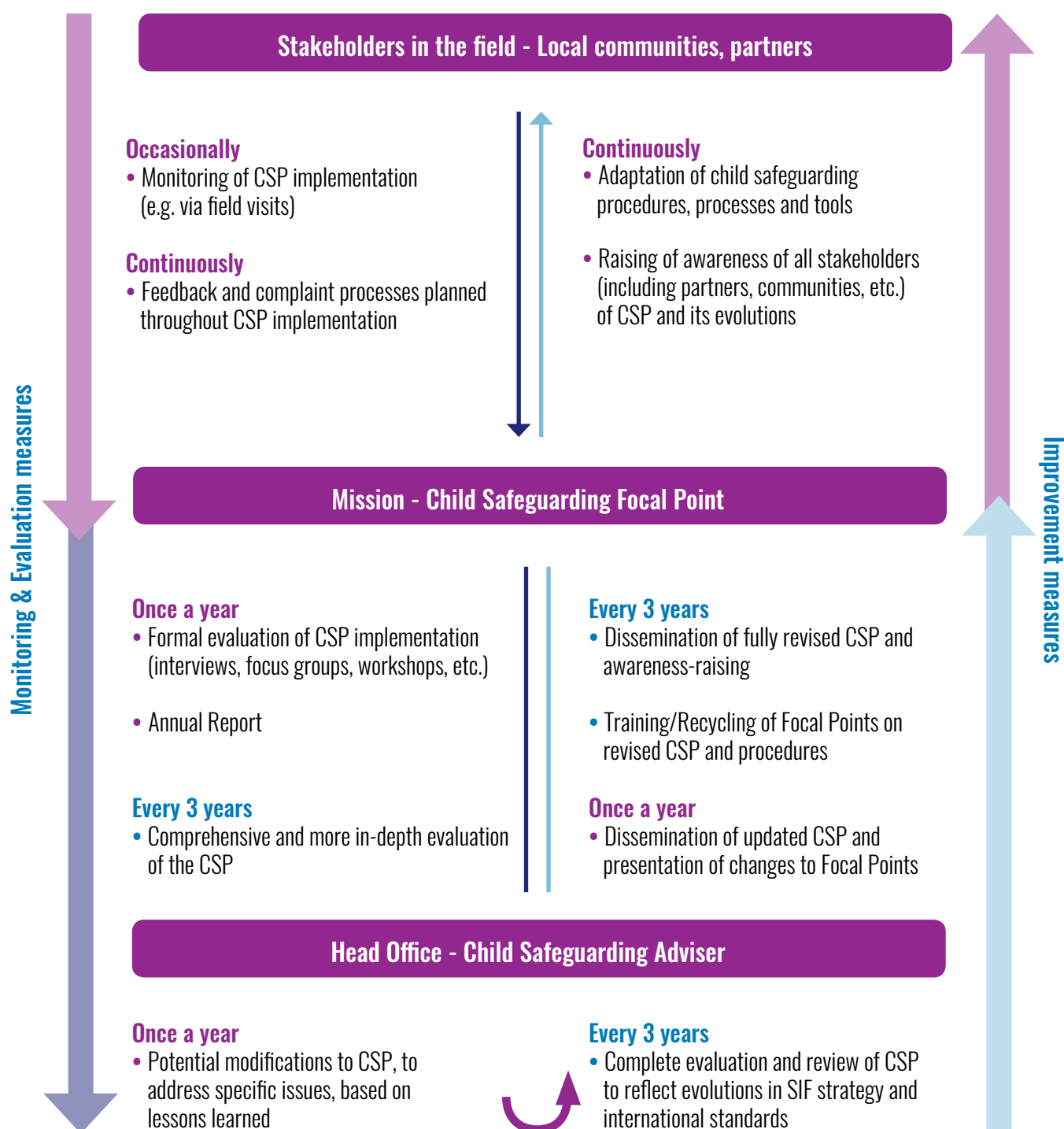
- **Once a year:** Based on the annual evaluation, and to address major recommendations requiring swift implementation, the Child Safeguarding Adviser can propose changes to specific points within the Policy;
- **Every three years:** In order to adapt the Policy and procedures to changes in SIF's multi-year Strategic Plan and international child safeguarding standards, the Child Safeguarding Adviser carries out a full assessment of the Policy and procedures and revises them as necessary.

SIF's executive management reviews and validates the Child Safeguarding Policy and procedures as amended based on the Child Safeguarding Adviser's proposals. Thus, executive management is involved in monitoring child safeguarding progress and performance.

The revised policy and procedures are sent to the missions, where they are once again adapted to the local context, before being circulated and put into practice. Child Safeguarding Focal Points coordinate these improvement initiatives with the support of the Head Office Child Safeguarding Adviser.

**Child safeguarding progress, performances and lessons learned are communicated to the main stakeholders of SIF's interventions and integrated into SIF's Annual Report.**

## Summary diagram of the CSP Monitoring-Evaluation and Improvement Process





# GLOSSARY

**Abuse** Deliberate act resulting in an actual or potential negative impact upon a child's safety, well-being, dignity or development, perpetrated by an individual cultivating a relationship of trust, power or responsibility with the child (e.g. family member, guardian). There are four main types of abuse: emotional or psychological abuse, physical abuse, sexual abuse and neglect.

**Best interests of the child** one of the four guiding principles of the UNCRC (Article 3), which guarantees that the child's fundamental rights shall be respected. Children have the right to have their best interests, i.e. whatever is best for their well-being, be a paramount consideration in all decisions made in their name. A child's best interest, determined by a variety of individual circumstances (age, level of maturity, presence or absence of parents, etc.), should a priori prevail over the interests of adults concerned. However, the best interests of children should not be "the only" consideration but should instead be one of the first elements to consider, and should weigh heavily in all decisions made in their name.

**Child** According to the UNCRC: "Every human being below the age of 18 years unless under the law applicable to the child, majority is attained earlier".

**Child labour** any work that deprives children of their childhood, their potential and their dignity, and that harms their education, health, or physical and mental development.<sup>30</sup>

The minimum legal age at which children are allowed to work varies with the type of work:

- **The minimum age** must not be under the minimum compulsory school leaving age, and never under 15 years.
- Children between the ages of 13 and 15 may be allowed to perform light work, provided that this work does not jeopardise their health, safety, school attendance, or participation in vocational guidance or professional training programmes.
- **Hazardous work:** The minimum age for any type of work likely to compromise adolescents' health, safety or morality must not be under 18 years.

**Child protection** The prevention of and response to abuse, neglect, exploitation and violence against children.

**Child safeguarding** "The responsibility that organisations have to make sure their staff, operations and programmes do no harm to children, that is that they do not expose children to the risk of

harm and abuse, and that any concerns the organisation has about children's safety within the communities in which they work, are reported to the appropriate authorities."<sup>31</sup>

**Community** For the purposes of this document, community is defined as a group of people living in a particular geographical area, such as a village or urban area (e.g. children and their families, education staff, health staff, religious and/or traditional leaders, members of groups or associations, etc.).

**Contractual partner** Legal entity with which SIF has entered into a contract committing both parties to the execution of activities and/or the provision of a service or goods, in exchange for compensation.

**Data** A collection of facts and information, such as numbers, measurements or observations.

**«Do no harm»** Guiding principle underscoring the commitment of NGOs to implement all prevention mechanisms required in order not to harm children through their actions.

**Exploitation** Abuse of a position of power or trust with a child for personal purposes, in order to gain advantage and/or profit, by means of cruel, unjust activities that endanger a child's physical health, mental health and healthy development.

**Gender** A set of norms, behaviours, roles and opportunities associated with being a woman, man, girl or boy. Gender influences relationships between girls and boys, and between women and men. Gender interacts with but is different from sex, which refers to biological and physiological characteristics.

**Individuals intervening for or on SIF's behalf** Employed staff, paid volunteers, interns, consultants, unpaid volunteers, interim workers, day workers.

**Informed consent** Agreement voluntarily given by an individual who is free to choose and considered capable of consenting. This implies that the individual is capable of understanding his or her own situation and making a decision in accordance. It is possible to seek the informed consent of a child who is old and mature enough.

<sup>30</sup> International Labour Organisation What is child labour? [online]. Available here: <https://www.ilo.org/ipecc/facts/lang--en/index.htm>.

<sup>31</sup> Keeping Children Safe Coalition – [www.keepingchildrensafe.org.uk](http://www.keepingchildrensafe.org.uk).

**Maltreatment** Any form of violence, abuse, exploitation and neglect that occurs to children under 18 years of age. It includes all types of physical and/or emotional ill-treatment, sexual abuse, neglect and commercial or other exploitation, which results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power<sup>32</sup>.

**Neglect** The intentional or unintentional failure, where there are resources and capacities available, to provide for a child's physical and psychological needs, on the part of the child's legal guardian, parent or the public institutions responsible for the well-being of children.

**Non-contractual partner** Natural person or legal entity with which SIF collaborates in order to achieve a common purpose.

**Participation** Continuous processes based upon mutual respect and the right to adapted information, characterised by dialogue both among children, and between children and adults. Through the voluntary exercise of this right to participation, children can play an active role in all decision-making processes impacting them, and learn how their own perceptions and those of adults are taken into account and influence the outcome of these processes. Several levels of participation are possible, from simple consultation to full participation (e.g. projects initiated and led by children).

**Personal data** Any information relating to an identified or identifiable natural person. A natural person can be identified directly (e.g. by their family name or first name) or indirectly (e.g. through a telephone number, licence plate, location data, their voice or an image). Personal data may include sensitive data.

**Physical violence** Deliberate maltreatment impacting a child's state of physical health, whatever the impact. Any physical aggression perpetrated upon a child by any individual, including beating, shaking, drowning, scalding, choking, etc.

**Psychological, emotional, moral violence** Utterances or actions likely to emotionally destabilise a child, at a precise point in time or over a continuous period, without the perpetration of direct physical violence (e.g. humiliation, threats, belittling or imposition of unreasonable demands likely to impact a child's psychological well-being or mental health).

**Reporting of a child protection incident** Procedure whereby a substantiated or unsubstantiated accusation of confirmed or potential child maltreatment is brought to the attention of the individual responsible for incident management.

**Sensitive personal data** Personal data revealing alleged racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data and/or biometric data processed for the purpose of uniquely identifying a natural person; health data or data relating to the sexual life or sexual orientation of a natural person.

**Sensitive protection data** Data that if accessed or disclosed without authorisation is likely to cause harm - in particular through discrimination - to specific individuals (such as information sources or other identifiable individuals or groups of individuals), or to impair an organisation's ability to exercise its activities, or to alter the general public's perception of an organisation or its activities. Certain data or information may be considered sensitive in one context, but not in another<sup>33</sup>. Sensitive data is not necessarily personal data.

**Sexual violence** Sexual violence against children encompasses both sexual exploitation and sexual abuse of children and can be used as an umbrella term to refer jointly to these phenomena, both with regard to acts of commission and omission and associated to physical and psychological violence<sup>34</sup>.

**Violence** The intentional use of physical force or power, threatened or actual, by an individual or group against a child, resulting in actual or potential harm to the child's health, survival, development or dignity<sup>35</sup>.

**Visitor** Any individual not directly employed by SIF travelling to one of the organisation's areas of intervention to witness operational activities, who therefore may come into contact with children (e.g. journalists, institutional donors, private donors or unofficial visitors such as staff member acquaintances).

<sup>32</sup> World Health Organisation. Child maltreatment [online]. (updated June 8, 2020). Available on: <https://www.who.int/news-room/fact-sheets/detail/child-maltreatment>.

<sup>33</sup> International Committee of the Red Cross. Professional Standards for Protection Work. 2018.

<sup>34</sup> Interagency Working Group on Sexual Exploitation of children. Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse. 2016.

<sup>35</sup> E. G. Krug et al. (ed.). World report on violence and health. Geneva: World Health Organization, 2002, p. 5.

# APPENDICES

## SUMMARY OF STAKEHOLDER COMMITMENTS AND LEVELS OF AWARENESS

|  | Selection Process  | Commitment/Documents to sign   | Training/Awareness-raising  |
|--|--|--|---|
| <b>Individuals intervening for or on SIF's behalf</b>                        |  |  |   |
| <b>Board of Trustees</b>   |  | <b>Code of Conduct</b> including child safeguarding provisions.  | <b>Awareness-raising</b> on CSP and delivery of a copy of CSP   |
| <b>Staff, paid volunteers, interns</b>                                       | Recruitment in accordance with HR procedure, in compliance with CS measures                            | <b>Contract</b> with commitment clause requiring CSP compliance<br><b>Code of Conduct</b>  | <b>Awareness-raising</b> on CSP for all staff and delivery of a copy of CSP<br><b>Training</b> for Focal Points and staff involved in Childhood projects and/or whose job positions involve high levels of contact with children  |
| <b>Unpaid volunteers</b>   | Recruitment in accordance with HR procedure and in compliance with CS measures                         | <b>Volunteering Convention</b> stipulating SIF's commitment to the CSP<br><b>Code of Conduct</b>   | <b>Awareness-raising</b> on CSP for all unpaid volunteers and delivery of a copy of the "Volunteer and Visitor Guide of Good Conduct with Children"<br><b>Training</b> for unpaid volunteers involved in Childhood projects and/or whose job positions involve high levels of contact with children |
| <b>Consultants</b>   | Recruitment in accordance with the Guidelines on the Selection of Consultants in line with CS measures | <b>Contract</b> with commitment clause requiring CSP compliance<br><b>Code of Conduct</b>  | <b>Awareness-raising</b> on CSP   |
| <b>Day workers and interim workers</b>                                       | Simplified recruitment process   | <b>Contract</b> stipulating SIF's commitment to the CSP<br><b>Code of Conduct</b>  | <b>Awareness-raising</b> on CSP   |
| <b>Other individuals/entities</b>  |  |  |   |
| <b>Contractual partners including service providers and suppliers</b>        | Selection in accordance with partner selection process in compliance with CSP measures                 | Ranking Process:<br>• Contact with children: <b>Contract with commitment clause</b> requiring CSP compliance and Code of Conduct<br>• No contact with children: <b>Code of Conduct</b><br>• Exception: <b>Contract with commitment clause</b> requiring impending compliance or strengthening of child safeguarding measures | <b>Awareness-raising</b> and/or <b>training</b> on CSP, based on roles, responsibilities and known risks  |
| <b>Visitors</b>  | Visitor authorisation by HoM / Department Director   | <b>Guide for good behaviour towards children</b>   | <b>Awareness-raising</b> on CSP   |
| <b>Other stakeholders: Non-contractual partners, local communities, etc.</b> |  | No formal commitment   | <b>Awareness-raising</b> on CSP possible via interventions  |



## CODE OF CONDUCT - EXTRACT

According to the United Nations Convention on the Rights of the Child (1989), the term “child” refers to all human beings under eighteen years of age.

### All recipients must accept their responsibility to adhere to this Code of Conduct, and in particular to:

- Respect children’s rights, especially their right to safety, and always act in the best interests of children.
- Support children and their families to take part in deliberations and decisions that affect them (with regard to their well-being, standard of living, etc.) according to their age and level of maturity.
- Treat all children with respect and fairness, without any discrimination.
- Behave in a non-violent, caring and educational manner without ever abusing their authority or their position as an adult.
- Obtain authorisation from the child and their parents or legal representatives prior to taking photos, making videos and/or using their image or telling their story.
- Ensure that the dignity and rights of children are always respected when taking photos, recording videos and gathering children’s testimonies, and that the child and their family are never put in danger as a result of Secours Islamique France communication.
- Foster open communication and a climate of trust with other employees, unpaid volunteers, partners, children, their families and other members of the community to facilitate the sharing of concerns, and the reporting of child protection incidents and to discuss child safeguarding improvements.
- Immediately report to the Child Safeguarding Focal Point any suspected or alleged breach of the Child Safeguarding Policy or this Code of Conduct, including any type of child abuse (even if the information is vague). Confidentiality will be observed throughout the procedure.

### All recipients must accept their responsibility to never:

- Abuse or physically assault a child, whether as a disciplinary punishment or in any other context.
- Engage in sexual activity with a person under the age of 18, regardless of the legal age of consent or the local law and customs, or make sexual comments about children. Sexual activity with children is systematically considered non-consenting, regardless of whether a victim gave consent. SIF will therefore reject all arguments alleging ignorance of the victim’s age.

- Enter into an inappropriate relationship with a child that might endanger their life, their development and their well-being, even if this relationship is permitted by law or by local customs.
- Behave in an inappropriate manner with a child through gestures or words that could humiliate, demean, or unsettle them or be misinterpreted and place the child in an uncomfortable or dangerous position with respect to their community and thus affect their psychosocial development.
- Discriminate or exclude a child, or conversely demonstrate favouritism, in both cases creating a situation of injustice.
- Remain alone with a child, especially in an enclosed space, unless this is necessary for the child’s safety. Always be accompanied by at least one other adult. If exceptionally it is necessary to remain alone with a child, always stay within another adult’s field of vision.
- Engage in a non-professional relationship with the child and/or the child’s family. This includes inviting a child to one’s home or making contact via social media.
- Support or participate in any form of illegal, exploitative or abusive activities, and in particular any form of child labour.
- Take and/or publish images of children for non-professional use, especially on social media, and particularly if the children are identifiable. In all cases, recipients of this Code of Conduct commit to updating the privacy settings of all publications that include images of children, in order for personal accounts to remain private.
- View, publish, share or produce any child pornography images or share pornographic images with children.
- Stigmatise children by portraying them as victims, as weak or helpless and powerless, as this could harm them.
- Violate the consent obtained from children, their parents or legal representatives or the lack of consent (e.g. non-transfer of image rights).

<sup>36</sup> Marriage with a person under 18 years of age is also prohibited. This ban does not however apply to SIF’s partners who are legally married to a person under 18 years of age, provided that this person is over the age of majority or consent in their country of citizenship.

## ROLES AND RESPONSIBILITIES OF THE CHILD SAFEGUARDING FOCAL POINT

The CSFP plays a central role in establishing, implementing and evaluating the CSP. To clarify the CSFP's role, the following list of specific tasks and responsibilities shall be adapted according to the situation.

### Specific Tasks:

- Act as the mission's primary child safeguarding contact point.
- Develop an annual CSP implementation plan for the mission, adapted to the local context and legal framework, and ensure the monitoring and evaluation of this plan.
- Deliver briefings and/or training to staff and associates (in particular, partners) so that they have a good understanding of the CSP and associated responsibilities. Training staff includes creating/adapting the necessary tools for child safeguarding and/or protection.
- Advise and assist staff and partners/associates on implementing the Child Safeguarding Policy, including the initial risk assessment stage.
- Develop a network of contacts and carry out mapping of local experts, protection agencies and competent authorities in the fields of child protection, social assistance, health, national legislation, etc. so that the right information is available when external guidance or support are required (including in the event of an incident) in order to provide an appropriate response (e.g. shelter, medical care); keep this list of contacts up to date.
- Make sure that the children, families and communities working with SIF have access to and are aware of the CSP, and in particular the Incident Reporting Procedure.
- Participate in setting up a child-friendly feedback and complaints mechanism, as necessary, in collaboration with the mission's MEAL staff. This mechanism must be defined with the children and communities concerned, to make it accessible to them. It must also comply with SIF's internal procedures to ensure that it functions effectively.
- Make sure the CSFP's name and contact details are accessible, so everyone knows who to contact if child abuse is suspected, and how to follow the Incident Reporting Procedure.
- Act as the first point of contact for child safeguarding incident reporting at the local level, and forward information to the Head of Mission (or to the France Social Action Department Director).
- Record all incidents precisely in a secure register and ensure that the information contained therein remains confidential.
- Participate in child safeguarding case management decision-making, ensure that the child's best interests are considered and, where appropriate, ensure the child's participation in the case management procedure. Make sure that the privacy and rights of the persons concerned (children, whistleblowers, offenders, etc.) are respected during the case management procedure.

- Provide feedback to the whistleblower and the people involved in the procedure to guarantee a systematic institutional response and ensure SIF's accountability and credibility with regard to communities and its partners.
- Communicate with the Data Protection Officer (DPO) in matters relating to the right to be informed, as well as to personal data deletion and rectification.
- Take part in child safeguarding discussions and working groups.
- Prepare and transmit an Annual Report to the Child Safeguarding Adviser at Head Office regarding progress on CSP implementation, together with an action plan to ensure the continuous and improved local application of the Policy, through capitalisation on past experience.
- Participate in training and request the necessary resources (internal and/or external) to acquire the required skills to occupy the CSFP role; seek information on "best practices" in line with international humanitarian standards.

### Required Profile:

Based on the provisions of the CSP, the following list of skills and abilities has been defined to help designate CSFPs who are capable of assuming their role and responsibilities:

- Have knowledge and experience in child safeguarding/protection (or at least experience working with children) and/or MEAL
- Be a national staff member (in particular for permanent CSFPs)
- Speak one of the local languages, to facilitate communication with children
- Have the capacity to carry out the various CSFP tasks during working hours
- Be a respected member of the mission whose opinions are valued
- Show commitment to children and the ability to advocate for their rights
- Communicate in a child-friendly manner (active listening, patience, tolerance)
- Manage stress and decision-making in emergency situations
- Be a team player (both locally and with the child safeguarding team at head office)
- Demonstrate impartiality and integrity; uphold confidentiality
- Possess the necessary skills to lead training sessions and pass on knowledge
- Show sensitivity on cross-cutting issues (gender, inclusion, culture, migration).

Nevertheless, it is important to note that all CSFPs will receive capacity-building training on child safeguarding, especially if the mission does not have staff with the necessary skills.

## CSP KIT: SIF PROCEDURES AND TOOLS TO IMPLEMENT THE CSP

### Human Resources

- > SIF Code of Conduct
- > Child-safe recruitment procedure
- > Child Safeguarding Focal Point basic job description
- > Guidelines for Child Safeguarding Focal Points
- > CSP implementation terms for contracts with partners
- > Guide of Good Conduct with Children
- > CSP checklist for visitors

### Data Management

- > Guidance Note on the management of children's personal data
- > Data Management Checklist
- > Personal Data Consent Form
- > IT data protection measures

### Project Management

- > Guidance Note on Child-safe Project/Activity Management
- > Child-safe Project/Activity Checklist
- > Child safeguarding Risk Assessment Grid
- > Factors that may increase risks for children
- > Examples of risk factors and mitigation strategies

### Training and awareness raising

- > CSP awareness-raising materials for staff
- > CSP awareness-raising materials for partners
- > Resources for training on child safeguarding

### Communication and Advocacy

- > Guidance Note on Communication, Media and Advocacy
- > Activity and Image Consent Form

### Case Management

- > Incident Reporting Procedure
- > Child Abuse Case Management Procedure
- > Guidelines to support children lodging a complaint
- > Child protection legal and policy mapping
- > Mapping local child protection actors

### Implementation

- > CSP action plan for missions
- > FAQ

This is a non-exhaustive list. Please see the toolbox for all available documents and/or contact the childsafe team by email: [childsafe@secours-islamique.org](mailto:childsafe@secours-islamique.org)

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