

CHILD SAFEGUARDING AND PROTECTION POLICY

POLICY STATEMENT

At CIFF, we are committed to recognising, promoting and protecting the rights of all children. CIFF believes that the welfare of children is the highest priority and that it is the responsibility of everyone who works for and with CIFF to ensure that children are protected from abuse and exploitation. We recognise that safeguarding considerations permeate all aspects of CIFF's work and we strive to prioritise safeguarding in all CIFF's policies, practices and activities.

In line with the United Nations Convention on the Rights of the Child (UNCRC), we recognise that all children, (meaning children under the age of 18 years), have a right to protection and freedom from abuse, including exploitation, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity.

As a grant-giving foundation, we require all CIFF Personnel and grantees to uphold and demonstrate best practice in child safeguarding and protection to ensure that children who come in contact with CIFF Personnel and/or a CIFF-funded project are protected from any form of abuse or exploitation.

DEFINITIONS

Child abuse: physical, sexual, emotional abuse and/or neglect. Abuse can take place in person and online, by other children and/or adults, including those in positions of trust.

Child safeguarding: *proactive* steps taken to prevent violence against children including all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse.

Child protection: *responding* to concerns and/or disclosures that a child may be experiencing, or be at risk of physical and/or mental violence, injury and/or abuse, neglect and/or negligent treatment, maltreatment and/or exploitation, and/or sexual abuse.

Disclosure and Barring Service: The Disclosure and Barring Service (DBS) in the United Kingdom helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA). It is responsible for processing requests for criminal records checks and deciding whether it is appropriate for a person to be placed on or removed from a barred list.

SCOPE OF THIS POLICY

This policy applies to all CIFF employees, **contractors**, trustees, consultants, fellows, advisors, interns and volunteers (referred to in this policy as '**CIFF Personnel**'). This policy recognises that CIFF Personnel may have access to sensitive, confidential information about children, access to images and may visit CIFF-funded programmes.

Additionally, CIFF recognises that direct services and support to children is primarily implemented by our grantees. Consequently, CIFF has requirements (set-out below) for all grantees, sub-grantees and third-parties that grantees may appoint.

EXPECTATIONS OF OUR GRANTEEES

The safeguarding and protection of children is a non-negotiable in all projects and programmes funded by CIFF. Therefore it is a requirement that all grantees:

1. Have their own tailored Child Safeguarding and Protection Policy.
2. Sign and adhere to CIFF's Safeguarding and Protection Agreement; and
3. Work collaboratively with CIFF's Designated Safeguarding Officers (**DSO**) where there are child protection concerns or disclosures.

This requirement also applies to all downstream personnel, partners and sub-contractors who are engaged by the grantee to perform any part of the grant activity where working with or contact with children is identified.

CIFF is committed to working with grantees to assist with drafting and implementing a Child Safeguarding and Protection Policy if they do not have one. CIFF will review the Child Safeguarding or Protection Policy of all grantees as part of the application process. Once a grant has been approved, CIFF will adopt a collaborative approach and work with grantees to develop and/or strengthen their tailored Child Safeguarding and Protection Policy and may provide additional support, both in terms of capacity and grant funds to assist with this.

Once a CIFF-funded project or programme begins, CIFF will have open and regular dialogue with the grantees regarding Child Safeguarding and Protection.

In the event that a concern or disclosure of abuse is reported to a grantee, the grantee will address it in accordance with its own child safeguarding or protection policy and national laws. In addition, the grantee must advise their local CIFF Designated Safeguarding Officer (**DSO**) or Programme Manger within 3 days of the knowledge of the concern or disclosure. Grantees are expected to provide regular updates to CIFF as to the status of any investigation and the outcome of the process. At any time, CIFF can request an independent audit of any grantee organisation, project or programme in relation to child safeguarding and protection.

Should any grantee fail to deal with safeguarding and protection issues in line with their policy or the CIFF Safeguarding and Protection Agreement, CIFF may terminate the Grant Agreement and any funding arrangements with immediate effect and, where appropriate, report the Grantee to appropriate safeguarding authorities.

CIFF'S SAFEGUARDING COMMITMENT

Awareness:

At CIFF, we commit to;

- ensuring that CIFF Personnel understand what safeguarding and child protection are; what the risks to children they work with are; what is expected from their behaviour with children and their responsibilities to prioritise the well-being of children at all times;
- ensuring that CIFF Personnel have read, understood and agree to uphold this policy;
- ensuring that CIFF Personnel know where to access this policy and that it can be easily found on the CIFF intranet and website;
- actively promoting safeguarding and children's rights to be protected, and ensuring that safeguarding is discussed with all grantees or potential grantees and that they agree to take their obligations seriously;
- sharing this policy with the broader donor community with whom CIFF operates.

Prevention:

We commit to:

- working collaboratively with our grantees to promote child safeguarding and protection best practices;
- discuss child safeguarding and protection actions, challenges and concerns/disclosures with grantees at each CIFF-grantee reporting interval (or at least every three months);
- have robust recruitment and selection processes to check that, to the best of our knowledge, all CIFF Personnel are suitable to work with or have contact with children (regardless of whether or not contact with children will actually take place). This includes background checks, such as Disclosure and Barring Service (DBS) checks (or the local equivalents in CIFF's other geographies) (which should be refreshed

at least every three years), behaviour based interviewing, specific questions on safeguarding in interviews to understand individuals' attitudes to safeguarding, completing a self-disclosure form, and reference checks on suitability to work with children. The appropriate level of DBS check (basic, standard or enhanced) shall be determined by CIFF taking into account the level of contact the individual is expected have with children. Should there be a change of circumstance or role (for example increased travel) resulting in increased contact with children, it is the responsibility of the individual to notify CIFF who will conduct a further DBS check at a higher level;

- ensuring that all potential CIFF Personnel sign up to and abide by this policy and the attached Code of Behaviour (**Annex 1**) before commencing employment / contracted work/ appointment;
- appointing a trained Designated Safeguarding Officer for each office who is supported by the General Counsel;
- taking stringent measures against any CIFF Personnel or grantee who abuses a child, or who does not uphold this policy, including not taking action when they have reasonable grounds to suspect a child might be at risk of harm. This includes CIFF reporting the individual/grantee to the relevant authorities and registers;
- safe storage of all confidential material, including material with personal data, in line with GDPR Regulations and CIFF policies.

Reporting:

We commit to:

- CIFF Personnel being clear what to do when child protection concerns or disclosures arise;
- CIFF Personnel knowing who their local DSO is and how to contact them;
- all concerns or disclosures being reported to the DSO immediately (within working hours);
- all Personnel knowing what steps to take if the concern/disclosure is outside of working hours, they cannot contact the DSO or the concern is regarding the DSO.

Responding:

We commit to:

- ensuring the safety of the child is always the first priority and that action is taken to support and protect children who are the subject of concerns regarding possible abuse;
- applying the principle of 'best interests of the child' to all child safeguarding protection concerns and disclosures;
- taking all concerns and disclosures seriously and fully supporting any CIFF Personnel who in good faith raises his or her concerns. No form of coercion, intimidation, reprisal or retaliation against any CIFF representative who reports any suspected form of abuse or exploitation is tolerated. See also CIFF's Whistleblowing Policy in the CIFF Staff Handbook and CIFF's Whistleblowing statement on its website;
- handling all concerns and disclosures in a confidential manner, with information shared on a 'need to know' basis;
- all incidents being dealt with promptly, and all cases relating to CIFF Personnel being investigated and reported to the Executive Team within one month of being reported to the DSO. Where deemed necessary or appropriate (such as cases of serious harm to a child) the DSO will inform the Executive Team and Trustees of CIFF of grantee case details.

Investigating:

CIFF Personnel:

- If a concern or disclosure relates to a CIFF Personnel, CIFF will form a Child Protection Investigation Committee consisting of an Executive Director, the HR Director, the General Counsel and an external protection expert.
- Where an allegation is made about a CIFF Personnel, the individual may be immediately suspended from their employment or contract without prejudice, whilst the investigation takes place. Where feasible, a decision as to whether the individual can return to work, be dismissed or further time to make a decision is required, will be made by CIFF's Executive Team and the DSO within 28 days. In some cases, particularly where local authorities are involved, more time may be required before a decision can be made.
- Should an allegation of abuse or other breach of this Safeguarding and Child Protection Policy be substantiated, the individual will be subject to disciplinary action in accordance with CIFF's Disciplinary Procedures which may include dismissal or termination of contract and reporting the concern/disclosure to relevant safeguarding authorities.

CIFF grantees:

- Where a concern or disclosure relates to a grantee, CIFF requires all grantees to inform CIFF within three (3) days of the concern / disclosure being made. Where the grantee chooses to seek advice or support from CIFF regarding a concern or disclosure, CIFF will support the grantee to investigate all concerns and disclosures in line with their Child Safeguarding and Protection Policy and local legislation. CIFF and the grantee may decide to:
 - Internally investigate the concern or disclosure
 - Report a concern or disclosure to a local children's protection services
 - Report a concern or disclosure to the police particularly if someone is or may be in immediate danger
 - Report the outcome of the investigation to relevant external bodies such as the criminal records bureau and/or Charity Commission (UK) or equivalent in other geographies
- Where CIFF has concerns that a partner organisation is not following best practice, CIFF may take independent action in line with this policy.
- All allegations regarding CIFF Personnel and grantees will be handled equitably and transparently (with due regard to confidentiality) irrespective of whom they are made against, and taking into account the rights of the parties involved. Whilst aiming to make fair, fact-based decisions, CIFF will always prioritise the well-being of children in its decision-making.

Training and Education:

We:

- Provide training to all new CIFF Personnel that may come into contact with children in their role, during their induction process, and in any case, within three months of starting with CIFF.
- Provide annual refresher training to CIFF Personnel that may come into contact with children in their role;

- Ensure CIFF Personnel who have specific responsibilities for keeping children safe (including DSOs) have access to specialist advice, support and regular opportunities to update their skills and knowledge.

Media and Communications:

We acknowledge that child abuse, including exploitation can occur through the use of information technology, such as when children are photographed or filmed in an inappropriate way. Transparency, openness and appropriate professional purpose underpin any CIFF Personnel's interaction with children including via electronic and digital means.

We:

- obtain informed consent from the child and the parents/guardian before taking a photograph, video or audio recording and ensure that an explanation as to how, where, when and for how long the photo or film will be used is provided;
- take care to assess local traditions or restrictions for reproducing personal image and endeavour to comply with them;
- ensure that children are presented in a dignified and respectful manner in text, photographs and film and that images are an honest representation of the context and facts;
- ensure that no pictures of children that can be interpreted as sexualised or degrading or shaming in any way shall be published by CIFF or CIFF Personnel;
- ensure that no personal data or sensitive information about any individual child that could compromise their care or protection is disclosed in publications or other materials, including surnames or any specific location details;
- ensure that pictures, materials and personal information regarding children are held in a secure place, whether physical or online and any lost or stolen equipment containing material should be reported immediately to the local DSO and to CIFF's IT Director
- report and record any complaints or concerns about inappropriate or intrusive images as a safeguarding concern.

Monitoring and Review:

With grantees:

- CIFF prioritises the monitoring and evaluation of proactive approaches to keeping children safe and responding to child protection concerns and disclosures.
- CIFF requires that safeguarding is evaluated on a regular basis as agreed between CIFF and the grantee. Safeguarding should be included in regular grantee reporting and evaluation.
- CIFF may request further information based on evaluation reports. Reasons for this may be (1) high numbers of child protection cases (2) no reported child protection cases (3) other reasons as specified by CIFF.

Internally, CIFF will:

- monitor compliance of this policy within CIFF and evaluate the effectiveness of this policy through annual checks, including an annual report to the Executive Team and the Board detailing the number of incidents or concerns of safeguarding reported;

- commit to review this Safeguarding and Child Protection policy every two years or sooner where there are changes in legislation or within the organisation that affect this policy.

This policy has been approved by the Board and is effective from 20 February 2018. The policy was updated in November 2018.

ANNEX 1 – CODE OF BEHAVIOUR

CIFF is committed to recognising, promoting and protecting the rights of all children. CIFF believes that the welfare of children is the highest priority and that it is the responsibility of everyone who works for CIFF and with CIFF to ensure that children are protected from exploitation or abuse.

CIFF representatives working with or having contact with children are expected to treat all children with respect and dignity, prioritising the child's safety and well-being at all times. As we expect the highest standard of behaviour from our representatives, this Code of Behaviour applies both in private and professional lives.

As a CIFF representative you **must**:

- Act in a way that seeks to care for and protect the rights of children and act in their best interests
- Immediately report concerns or disclosures of child exploitation and abuse and policy non-compliance in line with the CIFF Reporting Procedure
- Disclose any child related convictions or investigations you have been subject to which occurred before or during your association with CIFF

As a CIFF representative you **should**:

- Be aware of situations which may present risks and manage, plan and organise the work so as to minimise risks
- Ensure that another adult is always present when working in the proximity of children
- Ensure that a culture of openness exists to enable any issues or concerns to be raised and discussed
- Seek advice from your Designated Safeguarding Officer if you are concerned about a child, even if it doesn't appear significant, such as something not seeming quite right or making you feel uncomfortable.

As a CIFF representative you should **never**:

- Use language or behaviour towards children that is inappropriate, harassing, abusive, sexual, provocative, demeaning or culturally inappropriate
- Act in ways intended to shame, humiliate, belittle or degrade children or otherwise perpetrate any form of emotional abuse
- Form an intimate relationship with a child or any other relationship that could in any way be deemed exploitative or abusive
- Engage children under the age of 18 in any form of sexual activity, including showing a child sexual images, asking a child to take or show you sexual images and/or using sexualised language and/or sexualised behaviour in front of a child
- Invite unaccompanied children into a private residence
- Sleep in the same room as unsupervised children without a second adult being present
- Condone, or participate in, behaviour of children which is illegal, unethical, unsafe or abusive
- Condone abusive activities between children such as initiation ceremonies or bullying
- Use computers, mobile phones, video cameras or social media to exploit or harass children or access child exploitation material through any medium
- Befriend children who you come into contact with through work on social media
- Use physical punishment on children
- Hire children for domestic or other labour
- Photograph or film children without consent.

This is not an exhaustive or exclusive list. The principle is that CIFF Personnel should avoid actions or behaviour which may constitute poor practice or (potentially) abusive behaviour. Whilst "children" for the purposes of this policy means children under the age of 18 years, the Code of Behaviour also applies to CIFF Personnel's interactions with any young person of or over the age of 18 who is connected with a CIFF-funded programme.

I have read the above Code of Behaviour, understand it, and agree to comply with it:

Signature: _____

Date: _____

Name: _____

Role title: _____

ANNEX 2 – RESPONSIBILITIES

Trustees Responsibilities

- Ultimately responsible for Child Safeguarding and Protection at CIFF, including the application and implementation of this Policy.

Designated Safeguarding Officer Responsibilities

- Act as a focal point to receive, record and assess relevant information in relation to child protection (and consult with others including local protection agencies and local authorities). Any report should include, as far as possible, only facts. In the case of direct disclosure of alleged child abuse, the language used by the person disclosing should be recorded as closely as possible.
- Ensure that this Safeguarding policy is implemented and that it is effective and in line with recommended best practice
- Report to and advise the Executive Team on all Safeguarding and Child Protection matters, including an update on concerns/disclosures about individual CIFF Personnel at each Board meeting; and annual safeguarding reports to the Board outlining the numbers and types of cases raised by CIFF grantees.
- Increase knowledge and understanding of Safeguarding and child protection matters, especially where changes or updates to relevant best practice recommendations, legislation or other amendments are recommended.

Child Protection Investigation Committee

- Undertake full and objective investigation into concern of disclosure regarding any CIFF Personnel and submit a written report, including recommendations, to the CIFF Executive Team.

CIFF Executive Team

- Decide on further action, following receipt of a report from the Child Protection Investigation Committee, including whether the abuse should be reported to local authorities (such as police) or a serious incident report should be submitted to the Charity Commission of the United Kingdom or other regulator.

Human Resources

- Safe recruiting and selection practices including:
 - checks, such as Disclosure and Barring Service (DBS) checks for all CIFF Personnel,
 - behaviour based interviewing, specific questions on safeguarding in interviews to understand individuals' attitudes to safeguarding,
 - provision of a self-disclosure form
 - reference checks on suitability to work with children.
- Working in conjunction with CIFF Designated Safeguarding Officer/s and any external authorities and legislation where a concern or disclosure is raised about a CIFF Personnel

Legal

- Training for all staff that covers, how to:
 - proactively safeguard children
 - work with grantees to promote safeguarding, identify challenges, concerns and solutions, and investigate any child protection concerns or disclosures
 - recognise, respond to, report and record abuse in line with this policy
 - recognise safeguarding risks in CIFF grant-making, partners and projects
 - ensure they are appropriately knowledgeable, skilled and confident in meeting their safeguarding protection responsibilities.

Programme Managers Responsibilities

- Discuss Child Safeguarding and Protection with new potential grantees.

- Review Child Safeguarding and Protection policy of grantees and provide assistance to develop and improve if required
- Ensure safeguarding is discussed in project monitoring and evaluation

All Staff

- Attend training and understand obligations
- Sign and return Code of Behaviour
- Report any child related convictions, investigations or allegations that have been made against them to the DSO.

ANNEX 3 – CIFF SAFEGUARDING AND CHILD PROTECTION AGREEMENT FOR GRANTEES

We commit to:

- Prioritising the safety and wellbeing of all children who come into contact with our organisation (our centres, projects, staff and/or volunteers)
- Clearly outlining to everyone our policies and processes and code of conduct that keep children safe. These are mandatory for everyone involved in our organisation
- Having a tailored, up-to-date procedure for reporting child protection concerns and disclosures that everyone (staff, volunteers, children and their parents/guardians) knows about and feels confident in implementing
- Having at least one named child protection member of staff who has the knowledge and skills to promote child-safe environments and respond to concerns and disclosures
- Ensuring everyone understands their safeguarding roles and responsibilities and is provided with appropriate learning opportunities to recognise, identify and respond to child protection concerns and disclosures
- Using safe, transparent recruitment processes including (1) a signed-off criminal records check (where staff come into contact with children) (2) two positive references that confirm that the referees are not aware of any reason why the applicant should not work with children (3) up-to-date safeguarding training for all personnel
- Accurately recording and safely storing confidential information
- Conducting safeguarding risk assessments of our organisations, locations, projects and processes to have safe, inclusive environments for all children we support
- Giving children a voice – creating an environment and providing opportunities for children to tell us what we are doing well, what risks there are to them and how we can help keep themselves and others safe. We will be open to considering whether any independent oversight might be helpful to enable such an environment.

Our Safeguarding and Child Protection policy includes:

- A statement outlining our organisation's commitment to safeguarding and child protection
- Specific safeguarding concerns/risk areas for our organisation and how we address them
- Who is responsible for safeguarding and child protection
- How to report concerns and disclosures
- What happens if someone does not uphold the policy or procedures
- How we protect whistleblowers
- Related policies and processes

Our Code of Conduct for our organisation's representatives includes:

- Our expectations of their interactions with children
- Our expectations regarding their online contact with children (such as not befriending children who come into contact with the organisation on social media sites such as Facebook)
- Not being alone with a child where possible
- Not having sexual relations with anyone under the age of 18 years old or with any young person of or over the age of 18 who is connected with our organisation or programmes
- Reporting all concerns and disclosures (including any historic unreported concern or disclosure)
- Promoting the safety and well-being of children at all times

Grantee Representative Signature: _____

Representative's Role Description: _____

Grantee Name: _____

Date: _____