



MANUAL AND SAFEGUARDING STANDARDS









SAFEGUARDING CHILDREN AND YOUNG PEOPLE POLICY

SAFEGUARDING CHILDREN AND YOUNG PEOPLE IN ALL THEIR DIVERSITY

PLAN INTERNATIONAL

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DEFINITIONS, GLOSSARY AND ACRONYMS

When used in this document:
"Associate" refers to a range of contracted paid and non-paid individuals who have committed to work with or support a Plan International Entity. It includes, among others, board members, volunteers (including community volunteers), interns, sponsors, researchers, donors, consultants and contractors, staff and/or representatives of partner organisations and local governments (when operating in partnership agreement with a Plan International Entity).

"Child" in line with the United Nations Convention on the Rights of the Child and for the purposes of this Global policy, is defined as any person — girl, boy, young woman, young man, and child of other gender identities — under the age of 18 years (UNCRC Article 1). (See definition of Young Person/People or Youth below).

"***Director***" is an Executive Director of PII or a National Director.

"Direct beneficiaries" are the people who are the target of, and who we know will be immediately affected by one or more project outputs, irrespective of whether these are delivered directly by Plan International or by partners or organisations who are acting on behalf of Plan International.

- Direct beneficiaries are individuals who receive materials, equipment; interventions such as training, awareness raising, mentoring or other personal support.
- Direct beneficiaries may be a single member of a household (for example a mother participating in training on nutrition); or it may be all members in the household (for example, distribution of hygiene kits or malaria nets that the whole family use).

"***Harm"*** is any detrimental effect on a child's or young person's physical, psychological, or emotional wellbeing. Harm may be caused by abuse or exploitation whether intended or unintended.

"Manager" refers to a Staff member who has responsibility for line managing or supervising the work of Staff or Associates.

"National Organisation" or "NO" refers to a legal entity that has signed a Members' Agreement and License Agreement with PII.

"PII" refers to Plan International, Inc., including when operating through one of its subsidiaries. It generally includes international headquarters, regional offices, liaison offices, and country offices.

"Safeguarding children and young people' — the responsibilities, preventative, responsive and referral measures that we undertake to protect children and young people, ensuring that no child or young person is subject to any form of harm as a result of their association with the organisation. This includes ensuring that their contact with us and those associated with us and/or their participation in our activities, interventions and operations is safe. Where there are concerns over a child or young person's welfare or where a child or young person has been subject to violence, appropriate and timely actions are taken to address this and incidents are analysed so as to ensure continued learning for Plan International Entities.

"***Safeguarding - Gender Responsive Safeguarding"*** is a safeguarding approach that:

- takes full account of gender in considering the specific safeguarding needs of girls, boys and other gender identities
- integrates safeguarding measures that address protection risks for children and young people (girls, boys, young women, young men, and children of other gender identities) that stem from issues relating to gender bias and discrimination
- supports the empowerment and fosters the inclusion of girls, particularly in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection
-

"Staff" refers to individuals who receive a regular salary for work in any Plan International Entity as well as individuals paid by or through a Plan International Entity but located in another entity.

"Survivor-centred" refers to a particular approach in receiving and responding to reports of harm and abuse. A survivor-centred approach is integral to human and child rights approaches: it prioritises the rights, needs and wishes of the survivor.

"Violence" against a child or young person includes all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation of a child or young person. Acts of violence can also take place online through, for example, the web, social media or mobile phones. It may be an intentional act involving the use of physical force or power or it may be failing to act to prevent violence against a child or young person. Violence consists of anything which individuals, groups, institutions or organisations do or fail to do, intentionally or unintentionally, which either results in, or has a high likelihood of resulting in, actual or potential harm to the child or young person's wellbeing, dignity and survival and development.

"Visitor" refers to a range of persons who are visiting our offices or programmes and may come into contact with children and young people through a Plan International Entity, including journalists, media, researchers, visiting sponsors and celebrities.

"Young Person/People" or "Youth" in line with United Nations definitions, include individuals – young women, young men, and young persons of other gender identities — aged 15 years to 24 years old. This group spans the categories of 'children', 'adolescents' and 'adults' but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

INTRODUCTION

ABOUT THIS MANUAL

Plan International's Global Policy on Safeguarding Children and Young People, *Say Yes to Keeping Children and Young People Safe* (hereafter referred to as the 'safeguarding policy') and accompanying standards ensure its safeguarding measures are integrated into all core organisational systems, processes and practices. The aim is that all Plan International's operations, thematic portfolios, programmes, projects, activities, influencing work and interventions are designed and delivered in a manner that does no harm to children and young people.

The organisation has recently re-established its long-term focus and strategic direction to work with the most vulnerable and excluded children, paying particular attention to the needs and rights of girls. Whilst Plan International has put child safeguarding at the core of its work for many years, there is recognition that the organisation's approach to safeguarding needs to better reflect the different type of risks that girls, boys, children and young people *in all their diversity* face from their involvement with Plan International's work. This is particularly so where we work specifically to promote equality and challenge discrimination.

Since February 2018 the aid and development sector has shone a light on the implications and impact of power, bias, gender and diversity on the capacity of organisations to safeguard those who work in or with them. This manual describes Plan's approach to safeguarding which requires the application of a gender and intersectional lens. It highlights the potential impact of power and bias (within both the organisation and individuals) on our ability to safeguard children and young people effectively. The manual can be used to support the organisation, its staff and associates in continually challenging ourselves to do all we can to safeguard girls, boys and young people in all their diversity (hereafter referred to as children and young people in all their diversity).

1. PLAN'S APPROACH TO SAFEGUARDING

BACKGROUND

Violence and abuse are global phenomenon, affecting all societies and communities. They have devastating effects on children and young people, impair childhood development, and increase poverty. At Plan International, we have been committed for many years to realising children's rights as enshrined in the UN Convention on the Rights of the Child — including their right to protection and freedom from abuse and exploitation. Plan International has recognised that issues such as violence against women and girls and gender-based violence (GBV) are structural problems that arise from power inequalities within families, communities and societies as a whole and are not simply behavioural or cultural issues.

Violence and abuse within the aid and development sector reflect the power and structural inequalities that can be seen in societies. Violence against girls, boys, children and young people (as well as women and men) is often linked to gender or identity. Any organisation or agency working with families, communities and the wider society has a moral and legal responsibility to take all reasonable measures to ensure that the risks of harm (both intentional and unintentional) are minimised. No-one should be exposed to harm and abuse as a result of their contact with the organisation, its staff or its representatives either through their participation in the organisation's projects and activities, or as a result of any operational processes and activities. This requires organisations to think beyond the safeguarding policy and procedures.

In Plan International, one of our priorities is to keep the girls, boys, children and young people we work with safe and protected ('safeguarding') as described in our Global Policy on Safeguarding Children and Young People.

This policy demonstrates our commitment to hold ourselves to account for ensuring that no child or young person is harmed, or placed at risk of harm, as a result of their association with us. The policy governs the behaviours of Plan staff, associates and visitors (who are obliged through Plan International's Code of Conduct to behave appropriately with all people, in all their diversity), ensures that we specifically minimise risks to girls, boys, children and young people in all their diversity and that we report on and respond to any concerns appropriately putting the rights, needs and wishes of the survivor at the forefront.

The most well-intentioned safeguarding (or diversity or inclusion) policies do not, however, necessarily mean we will act or behave safely and in the best interests of those within the organisation and those we work with, without applying certain stereotypes or bias.
We need to be mindful of the ways in which these biases (consciously and/or unconsciously)[1] might inform our decisions, how we behave with others, and whose knowledge and experience we tend to take seriously. We need to work towards overcoming these stereotypes and bias to work inclusively in diverse teams that deliver the best outcomes for children and young people in all their diversity. Our approach to safeguarding aims to do just that.

OUR APPROACH TO SAFEGUARDING

Plan's approach to safeguarding explicitly recognises the implications of power, how power confers certain privileges[2] on groups within societies and how this may potentially negatively impact *(through all stages of safeguarding - from prevention to response and reparation)* on individuals and groups with certain identities.

All individuals have multiple identities and multiple social characteristics[3] and the way in which these intersect shapes their experience and may make them privileged or, alternatively, subject to discrimination, increased risk and disadvantage. **The application of an gender and intersectional lens to safeguarding** requires us to identify how interlocking systems of power impacts those who are most marginalised in society. We need to reflect on how factors such as class, race, sexual orientation, age, religion, creed, disability and gender, are woven together, as well as what this means for the power, privilege and biases that are associated with groups in all societies. We also need to recognise how this plays out within the organisation (the privileges conferred to certain job positions and what it means

1 Inclination or prejudice for, or against, a person or group, especially in a way considered to be unfair. May be conscious or unconscious and thus policies, procedures and standards plus internal self-reflection and cognisant effort are required to address this.
2 A special right, advantage, power or immunity granted or available only to a particular person or group.
3 This includes age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, any history of conflict with the law, where they live or any other aspect of their background or identity

for the identity of the person(s) holding them), as well as between the organisation and the wider society within which we work (recognising that we are a large influential INGO)[4].

- We have made firm commitments in our programme and influencing work to strengthen our support to children and young people who are discriminated against on the basis of their *real* or *perceived* gender identity as well as other intersecting identities such as sexual orientation[5], ethnicity and disability. Similarly, our Safeguarding Policy commits us to safeguarding girls, boys, children and young people in all their diversity[6] when they participate in our organisation's projects and activities and/or are in contact with our staff and those who represent us, or are impacted by our work.

The application of a gender and intersectional lens to safeguarding means we:

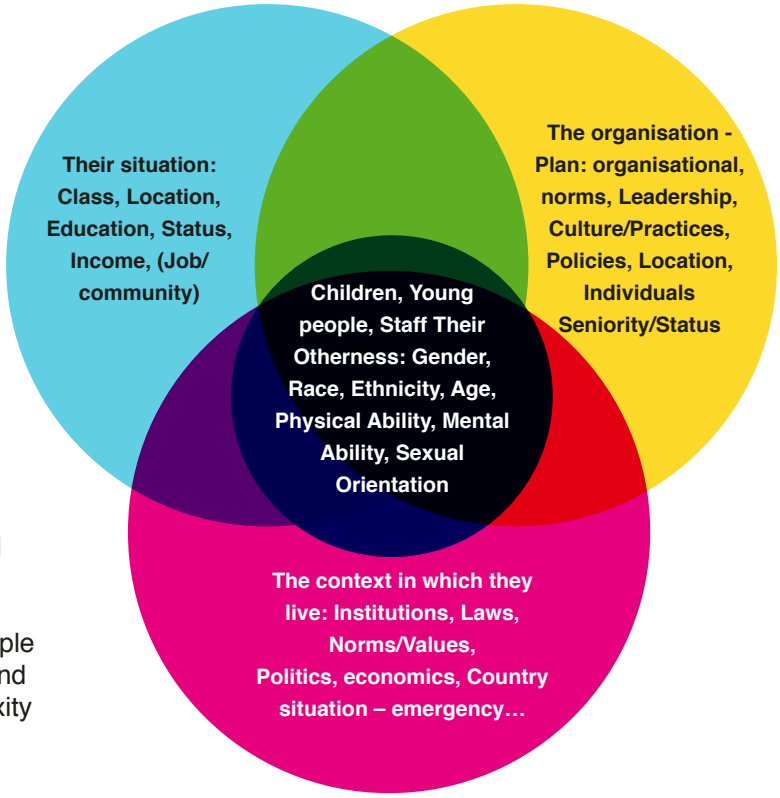
- take into account people's (children, young people and adults) gender and overlapping identities and experiences in order to understand the complexity of the prejudice and/or inequality they face, or conversely how this may lead to a heightened privileged status;

- reflect on our status as a prominent INGO and acknowledge the power imbalance this causes within the organisation (where within the organisation power lies, who typically are the "dominant"[7] and "subordinate"[8] groups and how this impacts on decisions we take on safeguarding), as well as between the organisation and the wider society;

- develop our capacity to analyse how girls, boys, non-bonary children and young people can be at risk of harm and abuse as a result of our organisation's work *because* of their particular identity (gender, sexual orientation, tribe, race, colour, disability etc.);

- consider how we can most effectively create safe spaces for all staff and for the children and young people, in all their diversity, with whom we work, where it is safe to challenge and address inequality, power and bias.

APPLYING A GENDER AND INTERSECTIONAL LENS TO SAFEGUARDING



As individuals and as an organisation we consciously choose to use our individual and collective power to work together with others and with girls, boys, children and young people in all their diversity to create a safer environment which benefits us all. This entails:

- Practising Plan International's organisational values and principles

- Recognising our power (both positively and negatively), as well as our own biases and privileges

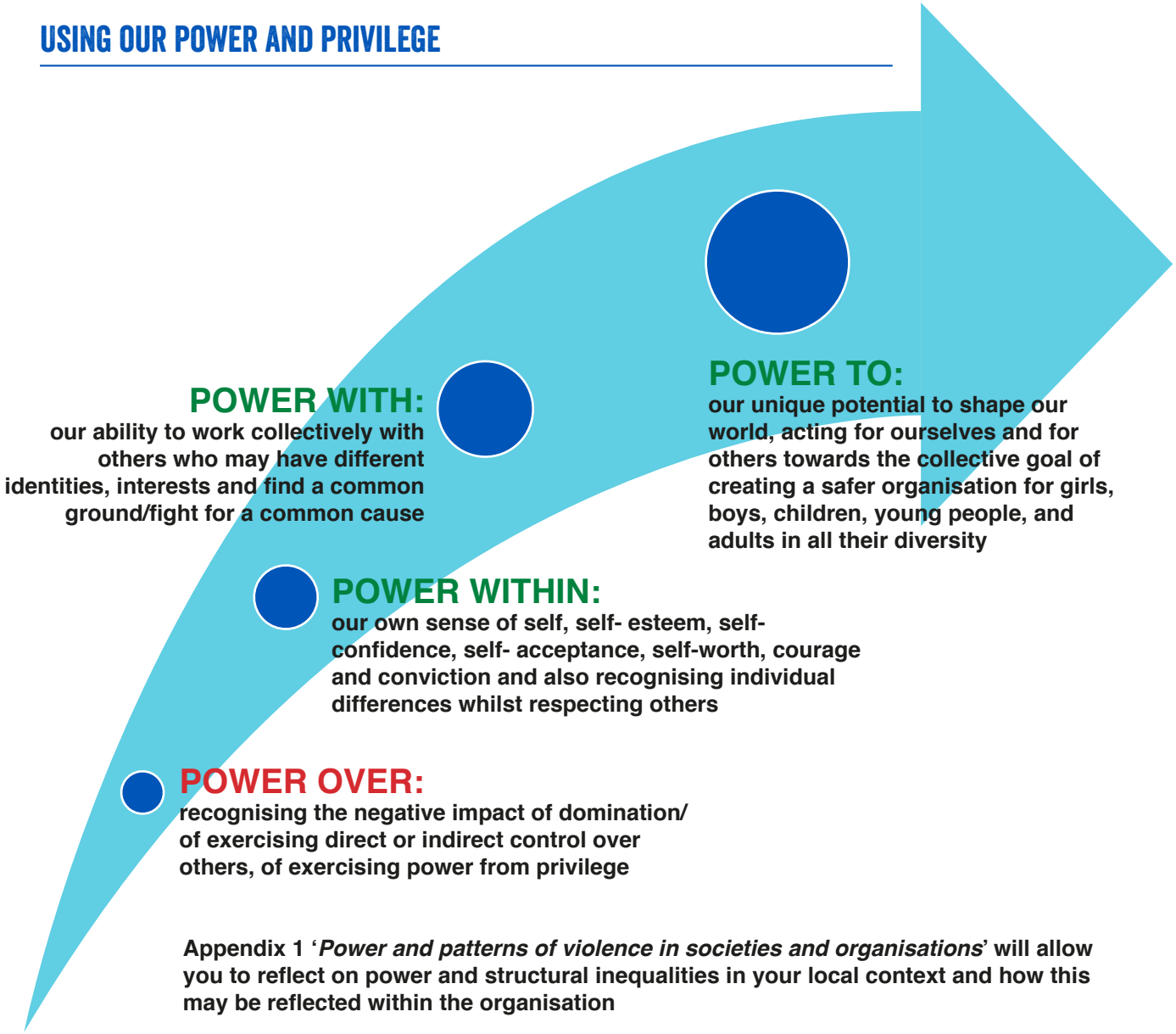
- Creating safe environments within the workplace and our interventions

- Being transparent, particularly around how decisions are taken and where we place our priorities in terms of safeguarding

4 Who we are in relationship to what society rewards by granting privileges and power to those who embody them and conversely oppressing /excluding/ discriminating against those who don't.
5This includes those who identify as lesbian, gay, bisexual, transgender or intersex (LGBTI) or those who have questions about their sexual orientation and/or gender identity (Q). The full term - LGBTIQ - respects that while some people have a clear sense of 'who and what they are' and are able and comfortable to define their status, many others may be uncertain. In reality, sexual orientation and/or gender identity is a spectrum of identities, characteristics, expressions and behaviours. Please note that while the term LGBTIQ is increasingly understood and used in different regions on the world, in many countries other terms may be preferred by LGBTIQ persons to self-identify.
6 This includes age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, any history of conflict with the law, where they live or any other aspect of their background or identity
7 Those with the most power, greatest privileges and access to and control over resources
8 Those with less power and authority, limited access to or control over resources

- Fostering a culture where staff and partners are able to challenge decisions when the safety of different groups of staff, children and young people might be compromised
- Supporting girls, boys, children and young people, when they need to, to say no to participation in the organisation's activities or listening properly to how they might be at risk from their participation and what needs to happen to minimise that risk
- Understanding the risks to (and vulnerabilities of) individuals who may step outside gender or group 'assigned' norms – being mindful of what we see and what we don't see
- Creating the mechanisms and opportunities for staff, girls, boys, children and young people in all their diversity to feel safe and able to report inappropriate behaviour
- Developing the systems, and creating the culture, where reports and concerns are taken seriously and acted on through a survivor-centered approach, bearing in mind the obligations the organisation has to responding where harm and abuse has arisen through the actions of our organisation.
- Representing the girls, boys, children and young people who are impacted by our work in a manner which doesn't reinforce power inequalities or reinforce negative stereotypes
- Promoting, in a safe way, equality for staff, children and young people in all their diversity
- Challenging abuse, inequality, exclusion, and discrimination

USING OUR POWER AND PRIVILEGE



POWER TO:
our unique potential to shape our world, acting for ourselves and for others towards the collective goal of creating a safer organisation for girls, boys, children, young people, and adults in all their diversity

POWER WITH:
our ability to work collectively with others who may have different identities, interests and find a common ground/fight for a common cause

POWER WITHIN:
our own sense of self, self- esteem, self-confidence, self- acceptance, self-worth, courage and conviction and also recognising individual differences whilst respecting others

POWER OVER:
recognising the negative impact of domination/ of exercising direct or indirect control over others, of exercising power from privilege

Appendix 1 '*Power and patterns of violence in societies and organisations*' will allow you to reflect on power and structural inequalities in your local context and how this may be reflected within the organisation

2. PLAN'S SAFEGUARDING FRAMEWORK

We take our responsibility to '**do no harm**' very seriously.

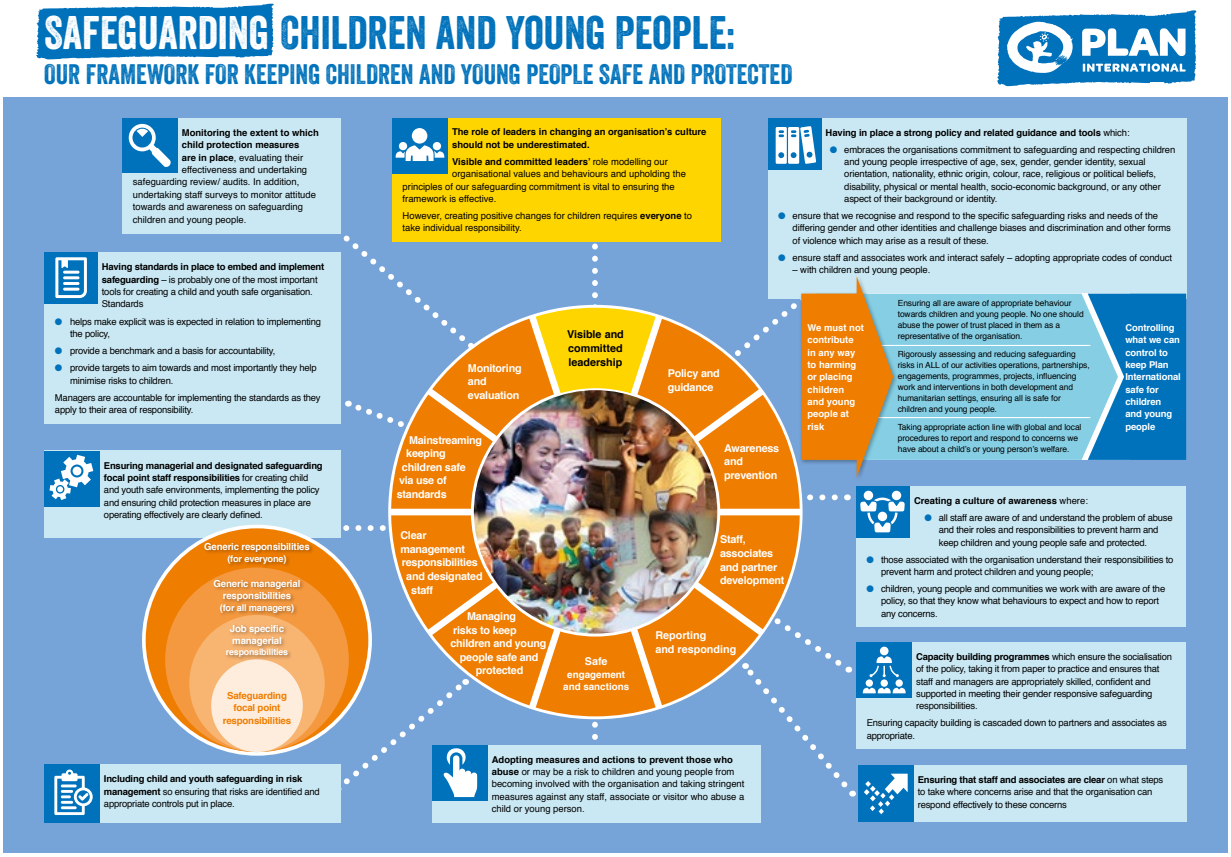
Our People are expected to take a proactive role in safeguarding, in understanding their roles and responsibilities to make safeguarding happen, in preventing harm to children and young people and in responding to alleged cases of abuse and exploitation.

Our leadership is committed to modelling behaviour that creates a safe environment for all those who work in and with Plan and invests time and resources required to ensure safety of children and young people we work with.

Our Programme, Research and Influencing Interventions safely address the problem of violence against children and young people in wider society and particularly the violence, abuse, discrimination or marginalisation that is based on gender and other identities. We are focused on challenging social norms and attitudes and on being gender transformative. Our programmes, therefore, present challenges, not least that children and young people may face increased risks of harm from peers, parents and others in the community (or more widely) because of the changes we are supporting them to bring about. We aim to design and deliver ambitious programmes, including influencing, monitoring and research work as safely as possible. We prioritise the safety of all those who participate in or are impacted by our work.

Our Public Relations is committed to representing children and young people in all their diversity in our storytelling, marketing and fundraising communications. We communicate on the real issues facing different groups of children and young people, but we always put ethics, safety, and respecting dignity first.

We deliver safeguarding through a holistic framework consisting of a comprehensive set of tools and guidance, awareness raising and capacity building, clear reporting and responding procedures, safe recruitment and engagement, risk management, assigned responsibilities for implementing safeguarding, a set of standards for which attainment is annually assessed and a leadership committed to a culture supportive of safeguarding.[9]



9 See graph in Appendix 4

ROLES AND RESPONSIBILITIES FOR SAFEGUARDING

LEADERSHIP AND CULTURE	• Organisational culture creates environment for safeguarding; leaders model organisational values and leadership behaviours, including accountability for a safe organisation • Leaders promote diversity, gender equality, inclusion and the positive use of power • Organisational strategy commits to creating the environment, processes and resources for safeguarding
PROGRAMMES	• All programmes/projects identify the range of risks that arise for children and young people in all their diversity, as well as the impact that programmes/projects might have when they aim to challenge and change social norms and gender dynamics and implement effective risk reduction and mitigation measures • Partner organisations are supported to have the appropriate organisational culture, systems, processes and skills to implement agreed safeguarding measures • M&E, Accountability & Learning processes/outcomes and impact indicators include awareness of the organisation's safeguarding framework amongst beneficiaries and whether the programme is safe for children and young people in all their diversity
INFLUENCING WORK	• All interventions identify appropriately the range of risks that arise for children and young people in all their diversity who are engaged in or impacted by such work • Stakeholders have the necessary skills and expertise to implement agreed safeguarding measures
MEDIA, PUBLICITY AND COMMS	• Images and information on children and young people meet safeguarding and ethical requirements and do not reinforce or exacerbate stereotypes
AWARDS/GRANT MANAGEMENT	• Safeguarding requirements are included in award criteria and sign off processes • Safeguarding activities and risk mitigation measures are appropriately resourced from the design stage • Donors, as far as possible, are supported to understand commitments to safeguarding
RISK MANAGEMENT	• Issues relating to safeguarding are appropriately reflected in risk management tools and guidance, with a particular focus on gender and identity-related issues
PEOPLE MANAGEMENT	• Teams reflect the skills, competencies and profile necessary to safeguarding children and young people in all their diversity • Competency and appraisal frameworks include knowledge, skills and attitudes for safeguarding children and young people in all their diversity • Recruitment, induction and ongoing training include testing and building awareness/ capacity on safeguarding children and young people in all their diversity • Organisational environment based on respectful relations that are example of how we behave in the external environments where we work
SAFEGUARDING	• Support to teams/departments to strengthen processes, tools and guidance ensuring safeguarding in the design and delivery of all Plan's work • Capacity building on how to promote a safe organisational culture and how to identify, mitigate, manage & monitor risks presented by Plan's work
ASSURANCE	• Audits include assessing whether, and how, programmes and operations are incorporating a safeguarding approach which reflects the needs of children and young people in all their diversity

ROLES AND RESPONSIBILITIES FOR SAFEGUARDING

KNOW-HOW GROUPS	COMPETENCIES FOR SAFEGUARDING
KNOW-HOW NEEDED BY INDIVIDUALS	
All staff (including those listed in job families and groups)	**Knowledge** • Understands organisational safeguarding and gender policies • Reflects on their value system and takes account of their biases towards individuals (including children and young people) in all their diversity • Understands the relevance of safeguarding to their work **Skills** • Challenges inappropriate behaviours of peers • Is able to implement safeguarding requirements in their area of responsibility **Behaviours** • Acts as a role model for the organisation's commitment to non-discrimination, safeguarding and safeguarding standards
KNOW HOW NEEDED BY JOB FAMILIES	
Executive Management (at local, regional and global level)	**Knowledge** • Understands power imbalances and ways in which the organisation may be reinforcing negative stereotypes and biases, as well as the impact these factors have on safety for children and young people in all their diversity **Skills** • Creates an organisational culture of inclusivity and diversity • Explicitly and visibly challenges gender bias and discrimination in organisational systems and processes • Creates organisational mechanisms which strengthen accountability to communities and donors on safeguarding **Behaviours** • Articulates and promotes the strategic importance of safeguarding in all aspects of the organisation's work • Demonstrates leadership in ensuring that staff, programmes and operations are safe for all children and young people in all their diversity • Emphasises the safety of children and young people above the organisation's resourcing needs • Walks the talk, putting values and knowledge into practice
Organisational Management/ Administration and those who lead core functions (Media, Communications, HR, Marketing, Research, Legal, Finance and etc.) at local, regional and global level	**Knowledge** • Understands what safeguarding means for the teams/departments they manage **Skills** • Leads teams to develop the necessary skills and expertise to undertake their roles and responsibilities for safeguarding • Leads on organisational change for relevant teams to ensure safeguarding is embedded • Develops indicators and frameworks for measuring how well teams are delivering on roles and responsibilities for safeguarding **Behaviours** • Holds teams accountable for delivering on safeguarding standards • Ensure relations based on respect.

Designated safeguarding staff	**Knowledge** • Understands the scope of safeguarding and how safeguarding children and young people fits within this • Understands the implications and impact of power within organisations and communities on safeguarding and how to apply a gender and intersectional lens to safeguarding children and young people • Understands the range of tools and resources available for implementing safeguarding across all business areas • Understanding on how to address issues that may arise in the implementation of the Safeguarding Policy **Skills** • Develops and facilitates learning and training events for staff and other stakeholders to safeguard children and young people in all their diversity • Presents written work in a clear and concise manner, easily accessible by a range of users • Is influential with staff, senior management and external stakeholders on safeguarding generally, and specifically on dismantling bias and addressing issues of power which negatively impact on safeguarding children and young people in all their diversity **Behaviours** • Maintains confidentiality • Self-reflective and aware of when personal biases might compromise safeguarding actions
Programme and Influence	**Knowledge** • Understands foundations of good quality programme and campaign design and delivery and how to incorporate safeguarding • Builds knowledge on gender, bias and discrimination and the impact of intersectionality on girls' and boys' experiences of safety within programming and influencing work **Skills** • Skilled in participatory approaches which are used to good effect in mapping social norms, patterns of violence and identifying risks and mitigation measures within their interventions. • Takes effective, considered and timely decisions to ensure programmes are safe • Makes sound judgements on risk management and particularly how to support bold programmes or campaigns which are carrying risks, ensuring that these are monitored and action taken where necessary • Develops and implements innovative solutions to minimise risks to children and young people in all their diversity • Sources required technical and professional expertise to design and deliver safe gender transformative programming **Behaviours** • Ensures contributions to programme and campaign design and delivery come from those with the relevant knowledge and expertise • Always considers safeguarding risks in all activities and interventions.

ACCOUNTABILITY FOR IMPLEMENTING SAFEGUARDING POLICY

- The **Boards of Plan International, Inc./ Limited and Plan National Organisations** are accountable for the Safeguarding Policy.

- The **CEO and Executive Directors of Plan International, Inc./Limited and the National Director**s are responsible for the implementation of the Safeguarding Policy.

- At office level, the **Office Director** (i.e. National / Regional / Country Director) is responsible for the implementation of the Safeguarding Policy and associated procedures.

- **Managers** are responsible for ensuring that the Safeguarding Policy is fully embedded within their areas of responsibility in accordance with the Safeguarding Implementation standards as applicable to their area of responsibility.

- **The Safeguarding Policy Focal Points** — are staff who have delegated responsibility, from the Office Director, for supporting the implementation of the Safeguarding Policy within a defined operational unit.(i.e unit at the National,Region al,Country,Global, Programme or Department, level). Note they are a resource for their unit and it is not their role to take on the safeguarding responsibilities for their unit).

- **Staff:** Generic staff responsibilities are detailed within the Safeguarding Policy. Staff may also have job specific safeguarding responsibilities

3. PLAN'S SAFEGUARDING STANDARDS

WHY STANDARDS? - PURPOSE AND SCOPE

Plan's Safeguarding Standards are designed to ensure that **safeguarding measures are integrated** into all core systems, processes, practices and activities that the organisation engages in. They are **informed by the principles which underpin the Safeguarding Policy** [available in **English**, **French**, **Spanish**] ensuring that we, and all who represent us, undertake our collective responsibility to 'do no harm' to girls, boys, children and young people in all their diversity.

The standards **provide a benchmark** against which safeguarding measures can be measured and audited, help **identify areas for improvement** and establish a **basis for accountability and challenge** should practice fall below the required level. Although implementing the standards cannot guarantee that children and young people will not be exposed to harm because of our work, the aim is to **minimise the risk** of abuse, harm and exploitation and ensure that as an organisation we do everything we reasonably can to **make Plan International safe**.

THE STRUCTURE OF THE STANDARDS

There are **11 standards**. These have been divided into **6 'core standards',** which are applicable across all Plan International offices and departments at all times, and **5 'business standards'** which are specific to the type of business or area of work the office engages in, or the activities being implemented, their relevance and applicability will vary according to 'when' and 'if' the office engages in that type of work or activity. An overview of the standards and their applicability is shown in the table below. It is important that all staff, teams and departments are familiar with all core and business standards so the standards and indicators, which are cross cutting, are applied as appropriate to the work or activities being implemented.

Each standard is accompanied by a set of '**attainment indicators'**, describing actions that contribute to the implementation or attainment of that particular standard. These 'attainment indicators' represent the minimum requirements that must be met in order to achieve compliance for that standard and ensure that the office is operating at a basic acceptable level of safety. For each indicator, guidance is provided on how the attainment/ implementation of that indicator may be evidenced/ verified - 'suggested means of verification'.
It is important, however, that each office strives to go beyond the minimum level of implementation for each standard, where this is applicable to the work the office carries out. The aim is to build good, safe practice in line with all standards across all parts of Plan International and thus work towards optimum implementation of the Safeguarding Policy.

Note: At the end of each standard is a list of resources which aid the implementation of the standard. Links to the resources are not provided as are updated frequently. However, all resources can be found in the Safeguarding Policy Standards Resources Library (located in Planet Say! Yes to Keeping Children and Young People Safe team site) and/or in the Planet Site of the Department that owns the resource.
If you have any trouble locating the documents please kindly contact the Global Safeguarding Unit at SafeguardingandEngagment.Unit@plan-international.org

CORE STANDARD	STANDARD AIM	APPLICABILITY
CS1: Creating a Safeguarding Culture	Leaders, managers and staff create an environment where it's safe to address structural inequalities, challenge issues of power and bias and promote equality for girls, boys, children and young people in all their diversity. Their behaviour demonstrates the safeguarding values and principle of the organisation	Standards 1 to 6 are 'core standards' and **apply to all parts of the organisation at all times.** All offices must always ensure: • a culture supportive of safeguarding • safeguarding risks are assessed and managed • all recruited/engaged are suitable to work/be in contact with children and young people • all are aware of, and educated on safeguarding • all contact and engagement with children and young people is safe • everyone remains vigilant to safeguarding breaches The aim is to ensure there is appropriate behaviour by all to children and young people in all their diversity; that concerns are reported / dealt with appropriately and that individuals and the office are held accountable for safeguarding.
CS2: Managing Safeguarding Risks in Plan's Business Areas	Risks to girls, boys, children and young people in all their diversity from their contact with, or the impact of the organisation, are identified and minimised. Risk management strategies for safeguarding are integral to all business systems and processes.	
CS3: Safe Recruitment, Selection and Engagement with Plan	Recruitment and engagement processes minimise as far as possible the risk of engaging an individual or organisation unsuitable to work with different groups of children, young people and communities.	
CS4: Awareness, Communication and Education on Plan's Commitment to Safeguarding	All staff and stakeholders have the requisite knowledge and understanding on safeguarding girls, boys, children and young people in all their diversity. Awareness, communication and education on safeguarding are targeted, regular and appropriate to the audience.	
CS5: Engaging Safely with Children, Young People and Communities	All types of engagement with, and inclusion of, girls, boys, children and young people in all their diversity, give priority to their best interest and safety. Behaviour towards children and young people is respectful, non-discriminatory and appropriate.	
CS6: Reporting and Responding to Safeguarding Concerns	Complaints mechanisms and reporting lines are appropriate for receiving reports of harm and abuse experienced by girls, boys, children and young people in all their diversity. Responses are survivor-centred, prioritise the best interests of the child or young person, and are timely and efficient.	
BUSINESS STANDARD	**STANDARD AIM**	**APPLICABILITY**
BS1: Safe Partners and External Stakeholders	Plan's partners and other external stakeholders, have the commitment, skills and capacity to safeguard girls, boys, children and young people in all their diversity.	**Business Standards 1 to 5 relate to measures specific to the type of business or area of work the office engages in, therefore their relevance and applicability will vary:** E.g., an office that manages a sponsorship programme, would need to implement Business Standard 4 – Safe Child sponsorship.
BS2: Safe Programming, Influencing, Monitoring and Research Work	Programming, influencing, monitoring and research work — including all such work undertaken in emergency/ humanitarian settings —¬ are designed and delivered in a manner which is safe for girls, boys, children and young people in all their diversity.	
BS3: Safe Publicity, Media and Communications	Publicity, media and communications preserve the privacy and dignity of girls, boys, children and young people in all their diversity, ensuring they are not harmed or exposed to risk through contact, as well as power imbalances or reinforcing negative gender or other identity stereotypes	
BS4: Safe Child Sponsorship	Child sponsorship programmes support the best interest of the child. Information on the child and their family as well as contacts between sponsors and children are handled sensitively and appropriately, to ensure they remain safe for both the child and the adult.	
BS5: IT and Digital Safeguarding	Plan's use and promotion of digital platforms to capture and present its work and encourage children and young people in their use of technology ensures that girls, boys, children and young people in all their diversity are safeguarded.	



THE SAFEGUARDING STANDARDS

CORE STANDARD 1: CREATING A SAFEGUARDING CULTURE

Leaders, managers and staff create an environment where it is safe to address structural inequalities, challenge issues of power and bias and promote equality for girls, boys, children and young people in all their diversity. Their behaviour demonstrates the safeguarding values and principle of the organisation.

All staff have a responsibility to ensure they do no harm and create safe environments for children and young people. We all need to recognise the impact and implications of power, privilege and bias on our ability to safeguard girls, boys, children and young people in all their diversity. Managers have a particular role and responsibility for setting high standards, acting as role models, recognising the inequalities within the organisation and creating an organisational environment which is safe, respectful and encourages questioning, challenging poor practice and speaking out on concerns and issues regarding safeguarding.

Where Plan responds, or is likely to respond, to emergencies it is also important that the environment for safeguarding is maintained, despite the additional pressures on the organisation to act quickly and efficiently in a changing environment. Managers and staff need to recognise the additional challenges as well as the increased risks faced by girls and boys and young people and be prepared to respond accordingly.

INDICATORS WHICH DEMONSTRATE THE ATTAINMENT OF THIS STANDARD

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS 1.1.Managers establish a culture of openness, reflection, learning and accountability in each location.	• Local safeguarding procedures clearly map out general management and leadership responsibilities for safeguarding implementation • Sample review of appropriate managers — role profiles should show specific management responsibilities for implementing the SCYPP implementation standards are included. • Evidence that managers have completed and attended safeguarding inductions/workshops and supported staff attendance of the same. • There is a plan of action — at local, regional and global level and implementation is regularly monitored by management.Evidence that managers are proactive in their responsibilities to implement safeguarding Evidence that efforts to create a safeguarding culture are co-ordinated and complementary to other organisational culture initiatives e.g. gender • Managers support and encourage the development of safe spaces for staff to challenge and support safeguarding culture of the office. This may be, for example, via the creation of a safeguarding oversight team whose remit is to discuss and lead on safeguarding for the Plan office. The team must be diverse, reflect staff at different levels and functions. It could be a route via which staff may raise concerns about negative power dynamics and poor safeguarding practice in the country and offer ideas and recommendations for improvement to be put forward to management and governance forums. The role, responsibilities and operating mechanisms of the Leadership Team must be formally agreed and defined through a Terms of Reference.
CS 1.2.Staff are supported to challenge inappropriate behaviour, negative power dynamics, poor practice and hold each other to account.	• Implementation responsibilities and objectives are reflected in Individual Accountability Plans against which performance is managed appropriately. • Staff have opportunity for one-to-one discussions with their line managers where they are able to discuss concerns (not just on safeguarding). • Staff are provided with regular opportunities to express their opinions on the safeguarding environment in a way that is safe – e.g. through anonymous surveys

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS 1.3 Management and governance forums regularly review how the organisation is creating an environment for safeguarding, addressing power imbalances or structural inequalities within the organisation which compromise safeguarding and managing safeguarding risks. Furthermore, there is genuine opportunity for staff to input to and influence decisions.	• Briefings on safeguarding, self-assessment results, implementation activities, recommendations from the safeguarding oversight team (see CS 1.1) and progress on the same are included in appropriate forums (e.g. department meetings) and/or communicated appropriately • Reports of review meetings provide evidence of related actions by such forums. • Interview with staff and associates (including management board and board of trustees) shows compliance to this indicator.
CS 1.4 Designated staff member(s) (aka safeguarding focal points) are appointed who are responsible for coordinating the implementation of safeguarding, and are skilled in providing training, technical advice and support to managers and staff, as well as different groups of associates, including children and young people we work with.[10]	• List of focal points for all geographical locations and/or departments is available, sight of defined role and responsibilities, evidence that contacts are publicised in a manner appropriate to the stakeholder group (e.g.inter/intranet, briefings/meetings with staff, children and communities, associate agreements) • Evidence of appropriate support mechanisms (e.g. task groups, delegate focal points, networking) • Evidence of the safeguarding focal points training on the different safeguarding aspects
CS 1.5 Additional (as necessary) designated staff members to be identified at the outset of any emergency, with their responsibilities and contact details to be known by all staff, associates, visitors and communities (including children and young people)	• List of suitable (skilled and knowledgeable) Safeguarding Focal Points for the emergency (this should also be evidenced in the disaster preparedness plan) • Evidence that contact details are disseminated and the list remains current • Interviews with staff and affected children, young people and families should show compliance to this indicator.
CS 1.6.All staff understand their safeguarding responsibilities, and are able to ensure safeguarding is embedded in their activities or area of work.	• Observations and interviews with staff (and associates as appropriate) reveal awareness of safeguarding commitments, of key documents and where to access them, how to report concerns and assurance that concerns are taken seriously
CS 1.7. Staff receive, read and sign up to Plan's Safeguarding Policy, Code of Conduct and Whistle Blowing Policy prior to signing an employment contract and when significant policy revisions are made	• Documented evidence that all staff sign up to policy, code of conduct and whistle blowing policy • Sample interview with staff show that this was done prior to, or at the time of, signing an employment contract

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS 1.8.Associates and Visitors sign up to the Safeguarding Policy and the Safeguarding Code of Conduct or other guidance[11] on appropriate behaviour towards children and young people as agreed with the engaging manager whilst engaged with Plan[12]	• Sample review of associate agreements show inclusion of the Safeguarding Policy and agreed appropriate codes of behaviour towards children and young people • Documented evidence that visitors receive and sign up to the Safeguarding Policy and appropriate codes of behaviour (e.g. signed visitors safeguarding leaflets)
CS 1.9. Concerns and reports are taken seriously; response and support is survivor-centered	• Interviews with staff show they are aware that all safeguarding concerns must be reported • A sample review of incidents reported reveal that concerns are responded to in line with global procedures – in particular that the wishes of the person who suffered the safeguarding incident are taken into consideration, and guide the response (where it has not been possible to do so – due to risks, implications, or legal requirements for example – reasons are documented and appropriately authorised), they are treated with dignity and respect and their rights to privacy and support (legal support, medical support, counselling etc) are prioritised.

CS 1.10.Lessons from practical case experiences are fed back into organisational learning systems and improvements made to practices	• Recommendations made against safeguarding incidents/ investigations, for strengthening safeguarding measures, are regularly drawn to the attention of senior management and this leads to improved practices in line with endorsed recommendations
	• A mechanism exists to:
	  • consolidate and analyse case data so as to learn and improve
	  • communicate case experience to those responsible for designing and delivering safeguarding modules and training
	  • A sample review of documentation shows compliance to this indicator.

RESOURCES WHICH AID THE IMPLEMENTATION OF THIS STANDARD

- Global Policy Safeguarding Children and Young People (SCYPP) [English, French, Spanish]
- Global Policy Safeguarding Children and Young People - Frequently asked questions [English, French, Spanish]
- Plan International's Framework for Safeguarding Children and Young People [English, French, Spanish]
- SCYPP Guidance: An Overview of SCYPP Accountability and Responsibilities [English, French, Spanish]
- PII Code of Conduct [English, French, Spanish]
- Harassment, Bullying and Discrimination Policy [English, French, Spanish]
- SCYPP Guidance On: The Selection and Responsibilities of Safeguarding Policy Focal Points and Networks [English, French, Spanish]
- Plan's Safeguarding Policy training toolkit – 'Helping Plan's people to become Active Protectors of Children and Young People' [English, French, Spanish]
- Plan's Online Self Directed Safeguarding Induction Module

10 Refer to Plan International's Guidance on the Selection and Responsibilities of a Safeguarding Focal Point
11 Associates may comply with their own Safeguarding Code of Conduct provided the contracting manager ensures it is consistent with Plan's Safeguarding Code of Conduct, alternatively an appropriate guide may be developed and agreed with the contracting manager using Plan's Safeguarding Code of Conduct as a guide
12 It is the responsibility of the engaging office to ensure that associates and visitors are informed of, briefed on and sign up to the Safeguarding Policy and agree codes of behaviour. It is the responsibility of the receiving office to provide incoming associates and visitors with a briefing and information on the policies in the local context and relevant local procedures (e.g. reporting concerns



CORE STANDARD 2: MANAGING SAFEGUARDING RISKS IN PLAN INTERNATIONAL'S BUSINESS AREAS

Risks to girls, boys, children and young people in all their diversity from their contact with, or the impact of, the organisation are identified and minimised. Risk management strategies for safeguarding are integral to all business systems and processes.

Managing safeguarding risks in all Plan's business areas is fundamental to ensuring "Do No Harm". Risk management needs to operate at different levels. A situation analysis or mapping of the external context in the country (or at local level – e.g., programme unit level, where significant variation exists) must be carried out, as well as a gender and other significant identity analysis. This will inform local procedures and risk mitigation strategies for preventing and responding to harm to, children and young people, but it also needs to clearly identify how risks differ between girls, boys, children and young people in all their diversity.

Country/departmental/project risk registers need to include potential risks of harm to children and young people from the systems or processes being implemented. Activities or events[13] which include children or young people need to be thoroughly risk assessed, including an assessment of specific and differentiated risks that different groups of girls, boys, children or young people might face from their participation in the event or activity.

If responding to emergencies which have caused unexpected changes, initial rapid assessments should become the basis of the country's initial response plan. Include in this assessment risks pertinent to the emergency (risks pre-existing the emergency and those created by the emergency) and an analysis of how risks are likely to be exacerbated or reduced as the emergency progresses.

INDICATORS WHICH DEMONSTRATE THE ATTAINMENT OF THIS STANDARD

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS 2.1. Mapping of the external context is undertaken including legislative and policy frameworks in place for protecting children and young people, potential risks children and young people face in their societies and communities and the services and support available for reporting, referral and response.[14] The mappings are regularly reviewed particularly during an emergency as service availability and/or functionality is likely to be compromised.	• Evidence of documented local mapping of the external context[15] and that it is made available to managers and staff as appropriate and feeds into the development of local safeguarding procedures (reporting and responding in particular). • Evidence that the office keeps abreast of legal requirements and changes are reflected in local mapping and procedures

13 Events - activities, formal or informal events where children and/or young people are brought together e.g. research activities, attendance at conferences or other activities involving children where risks to their safety might be increased (e.g. travelling away from home)

14 Pays particular attention to any local risk factors for girls, boys, children and young people in all their diversity, protection issues that constitute a crime in country and the legal, social welfare and protection arrangements and other local resources (this includes government agencies, local NGOs, CBOs, health services, interagency forums etc. which work on or have responsibility for child protection issues) in the context in which the organisation works. The global guidance on Reporting and Responding to Safeguarding Concerns contains a template for conducting the Local Mapping Exercise

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS 2.2. The Safeguarding Policy, its requirements and implications is disseminated widely and publicised to all relevant stakeholders and external communication that describe Plan's work and interventions includes reference to and/or information concerning Plan's commitment to safeguarding and the priority given to the best interests of the child.	• Evidence of communication channels (e.g. on websites, department/office team meetings, office display, briefings) and materials (newsletters, visit brochures, leaflets, posters, child friendly materials) as appropriate to the office type and activities. • A review of a sample of external communication material (online and offline) describing Plan's interventions shows compliance with this indicator.
CS 2.3. Local safeguarding procedures are developed in consultation with the appropriate staff, as well as girls, boys, children and young people in all their diversity, and communities (as far as possible) to determine their needs, key risks and appropriate procedures to mitigate these. The procedures are in line with global equivalents where these exist.	• Evidence of local procedures and consultation process (if appropriate) and assurance that they are in line with global equivalents and outcomes of mapping process (where appropriate). • Evidence that department/functional procedures reflect the requirements of the safeguarding standards as appropriate. • Interview with appropriate staff shows that in depth analysis is made for different groups of children and young people in all their diversity. • Interviews with staff, children, young people and community we work with describe an inclusive, consultative process of developing/ monitoring/ reviewing safeguarding measures which impact on them
CS 2.5. Emergency Preparedness Plans and Disaster Risk Reduction strategies should include potential risks for children and young people in all their diversity from Plan's emergency response, particularly identifying the likely implications for upholding the safeguarding commitments and implementation of the standards[16] in an emergency situation[17].	• Documented emergency preparedness plan shows compliance with this indicator. Of particular importance is: • dealing with high turnover of staff, • how safeguarding awareness will be maintained for staff, all groups of children and young people and other stakeholders, • how reporting and responding to safeguarding concerns will take place, • what additional principles and codes of conduct will need to be adopted given the context, • identification of the emergency Safeguarding Focal points There should be clear links with the mapping of the external child protection context.

15 ibid
16 Refers to the risk of Plan failing in its commitments under the Safeguarding Policy 'to do no harm' to children and young people.
17 Includes a mapping of local resources (refer to CS 2.1) and the provision of open, participative and transparent systems and processes for managing safeguarding related risks

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS 2.6. Review any safeguarding risk assessments within 48 hours of an emergency occurring. Conduct an ongoing review and update of the risk assessment and mitigation strategies as the situation continues to evolve, or at least on a monthly basis.	• Documented response plan in place. Risk assessment of the emergency considers safeguarding risks and mitigation strategies • Documented review of risk management strategies and evidence of issues followed through • Documented evidence of dissemination amongst staff, associates, visitors and children and/or interviews with then should show awareness of process and any amendments
CS 2.7. The standards are used as a self-assessment, learning and development and risk rating tool to track implementation of safeguarding, identify areas for improvement and measure the risk that may arise from lack of/weak internal safeguarding controls and measures. An action plan is put in place to address areas of partial or non-implementation.	• Assessed standards illustrate compliance with the attainment indicator • Evidence documented implementation plan which details required actions/activities, assigns responsibilities, completion dates and needed resources.

RESOURCES WHICH AID THE IMPLEMENTATION OF THIS STANDARD

- Rapid Risk Assessment Guide [English, French, Spanish]
- Plan's Child and Youth Safeguarding risk assessment process guidance [English, French, Spanish]
- SCYPP Guidance On: How to Conduct an Assessment of External Child Protection Context and Resources. "The Local Mapping Exercise" [English, French, Spanish] – an adaptation is available for an Emergency Context " [English, French, Spanish]
- Excel Version of the SCYPP Implementation Self-assessment and Risk Rating tool [English, French, Spanish]
- SCYPP Guidance: Online Completion and Review of the SCYPP Self-Assessment and Risk Rating [English, French, Spanish]



CORE STANDARD 3: SAFE RECRUITMENT, SELECTION AND ENGAGEMENT WITH PLAN INTERNATIONALS

Recruitment and engagement processes minimise as far as possible the risk of engaging an individual or organisation unsuitable to work with different groups of children, young people and communities.

Quality recruitment and engagement processes are an important part of ensuring that Plan International creates safe environments for those working in, and with the organisation. A minority of individuals will target organisations in order to gain access to children or vulnerable populations in order to abuse them. Others may have harmed staff, children or communities opportunistically in prior employment.

General good practice in hiring staff, engaging associates, and in contracting partners and suppliers, will help maintain high standards of conduct and competence, as well as ensuring alignment with organisational values and safeguarding competencies. In addition, the recruitment process provides an opportunity to create more diversity within the staffing cohort which will, in turn, contribute to better safeguarding of girls, boys, children and young people in all their diversity.

In contexts where implementing robust recruitment practices may be challenging, for example in emergencies or in countries where criminal record checks are not possible, consider what is necessary as a minimum to ensure that the recruitment of staff is as safe as possible, for example getting additional references.

INDICATORS WHICH DEMONSTRATE THE ATTAINMENT OF THIS STANDARD

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS3.1 • **There are clear policies and procedures on recruiting/engaging staff, volunteers (including community representatives, board members), consultants and contractors, assessing and vetting[18]** • **their competencies for safeguarding;** • **their suitability to be engaged with Plan and/work with children, young people and vulnerable populations or have access to their information;** • **their understanding of, and commitment to, safeguard people in all their diversity in line with Plan International's Code of Conduct.** **The guidelines should be developed using the global guidance[19] available as a guide.**	• Documented staff recruitment procedures and processes for engagement of associates and visitors cover safe recruitment practices[20]. • A sample review of staff personnel folders and associates' contracts/agreements show evidence that due process has been followed and capacity assessments for safeguarding took place. • A sample review of questions used to assess candidate's attitude, values and competences is available and evidence that this has been applied for successful candidates • Where the full/normal process has not been followed there is a documented rationale with appropriate authorisation.

18 The engagement of Partners is covered under Business Standard 1. The engagement of Sponsors is covered under Business Standard 5
19 Global Safeguarding Unit's Guidance on Vetting and Assessing Safeguarding Contact Levels of Job Positions and Guidance on Safeguarding Related Questions for Job Interviews

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS3.2 • **Policies and procedures on recruiting and engaging staff are duly complied with. In particular and as a minimum:** • **Jobs are assessed to identify the level of contact with children and young people, or access to their data, and the level of prevention checks needed for the post-holder.** • **Appropriate selection measures and pre-employment/engagement checks are carried out on all successful candidates or potential staff and associates.** • **Checks are completed before the person takes up the post** • **Interviews are prepared and planned ensuring consideration is given to the safeguarding competencies that candidates for that particular role need to demonstrate and include specific questions to draw out the candidate's attitudes and values, and potential for working to those competencies.** • **Staff and Associates sign up to the Safeguarding Policy and it is included in contracts**	• Documented staff recruitment procedures and processes for engagement of associates and visitors cover safe recruitment practices[20]. • A sample review of staff personnel folders and associates' contracts/agreements show evidence that due process has been followed and capacity assessments for safeguarding took place. • A sample review of questions used to assess candidate's attitude, values and competences is available and evidence that this has been applied for successful candidates • Where the full/normal process has not been followed there is a documented rationale with appropriate authorisation.
CS3.3 Plan International's commitment to safeguarding is included in all job advertisements, job profiles and pre/post-interview documentation to candidates.	
CS 3.4. Consideration is given as to how to attract a more diverse staff group, particularly for positions that have contact with diverse groups of children and young people or those who will have key decision-making responsibilities which could impact on safety.	• A review of the recruitment process for such positions should show compliance with indicator.
CS 3.5. Job specific safeguarding responsibilities are included in role profiles and are reviewed and evaluated within the current performance management process.	• A sample review of job descriptions for such staff indicate safeguarding responsibilities • A sample review of individual accountability plans and performance and management process indicate safeguarding implementation objectives, and identification of any training/support requirements.

20 ibid

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS 3.6. Contractual documentation, for example, contracts for consultants, contractors, suppliers (including vendors and service providers) and corporate agreements, include a clause on safeguarding[21], consequences of a breach, and the safeguarding measures/guidelines applicable to the type of engagement and work with Plan (e.g., data protection, safeguarding in media guidelines, making sure events are safe for children and young people etc).	• A sample review of agreements/contracts should show compliance with indicator.
CS 3.7.Third parties[22] having access to and/or managing child/youth sensitive data are vetted[23] appropriately to ensure their credibility and ability to guarantee the security of data held, before being covered by a contract. Access to Plan information is not granted until the contract has been signed.	• Documented procedures for assessing or vetting third parties, their credibility and evaluating their services • A sample review of documentation on engaging third party agents' show that due process has been followed. • Where not followed, there is an appropriately authorised documented rationale.

RESOURCES WHICH AID THE IMPLEMENTATION OF THIS STANDARD

- SCYPP Guidance On: Vetting Staff /Temporary Staff/Consultants and Assessing Contact Risk Levels [English, French, Spanish].
- SCYPP Guidance On: Sample Child Protection Related Interview Questions [English, French, Spanish]
- SCYPP Guidance – Screening and Vetting Potential Staff and Candidates in an Emergency Context [English, French, Spanish]
- The SCYPP Standards and Implementation Resources Library 'Resources for SCYPP: Core Standard 3– Safe Recruitment, Selection and Engagement with Plan' also contains guidance produced by other organisations on how to involve children in the recruitment and selection process.

The following documents are owned by the GH Legal Department and therefore not housed in the SCYPP Standards and Implementation Manual Resource Library

- Standard SCYPP clause for contracts GH , Regional and Country Offices (available in English only)
- Standards and Contract templates and guidance by the GH Legal Department – for GH and Regional and Country Offices

21 This should be in accordance with or guided by the contract templates set by the Global Hub's Legal department which ensures incorporation of clauses on safeguarding as well as other mandatory areas such as data protection are included in contracts
22 Someone other than Plan.
23 For example: examining, evaluating services and performance, performing a background check on the party



CORE STANDARD 4: AWARENESS, COMMUNICATION AND EDUCATION ON PLAN INTERNATIONAL'S COMMITMENT TO SAFEGUARDING

All staff and stakeholders have the requisite knowledge and understanding of safeguarding girls, boys, children and young people in all their diversity. Awareness, communication and education on safeguarding are targeted, regular and appropriate to the audience.

Plan International understands that in order for its organisational safeguards to be fully and effectively implemented, it is essential to raise the awareness of everyone associated with Plan (staff, associates, visitors, children, families and communities) on the obligations and commitments described in Plan's Safeguarding Policy. Education and training on safeguarding are critical for ensuring high levels of awareness and understanding on the impact we have as individuals and as an organisation, as well as for building confidence and competency in applying appropriate safeguards in our area of responsibility. It is also important that we build knowledge and awareness on issues of power, bias and intersectionality so we can examine and reflect on our own attitudes and challenge our thinking and approaches to safeguarding children and young people in all their diversity.

INDICATORS WHICH DEMONSTRATE THE ATTAINMENT OF THIS STANDARD

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS4.1. All offices and departments promote the policy, safeguarding code of conduct, standards and safeguarding measures to relevant stake holders (including children and young people) and assist different audiences, as appropriate, in understanding what they are for and what is expected from them with the respect to safeguarding of girls, boys, children and young people in all their diversity[24]	• Evidence of communication channels (e.g. on websites, department/office team meetings, office display, briefings) and materials (newsletters, visit brochures, leaflets, posters, child friendly materials) as appropriate to the office type, audience and activities. • Documented samples of key messages show compliance with the indicator. • Interviews with staff, associates, children and young people illustrate understanding and application of indicator.
CS4.2. The girls, boys, children and young people in all their diversity that we work with are engaged in developing materials which recognise the different issues that may be faced by children and young people in terms of how they individually identify themselves and how to communicate safeguarding in a way that speaks to them.	• Evidence of child friendly safeguarding training, briefing and communication resources which include diversity and intersectionality • Interviews with the children and families we work with should demonstrate awareness and understanding and describe how they contribute to Plan's safeguarding approach • A review of a sample of external communication material (online and offline) describing Plan's work shows compliance with this indicator.

24 Communication/Promotion should include key messages on Plan International's application of a gender and intersectional lens to safeguarding

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS4.3 Staff, Associates and Visitors are provided with safeguarding induction[25], briefing, training, learning, capacity building and support appropriate to their role and responsibilities (those with specific/ additional responsibilities should have access to specialist training) and engagement with Plan[26]. This is refreshed and updated as appropriate.	• Documented induction and training plans which include safeguarding induction/briefings/training and ongoing sessions scheduled and delivered. • Attendee lists of staff, children, young people and communities who have benefited from safeguarding capacity building opportunities. • Evidence that staff with specialist responsibilities for safeguarding (e.g. Focal Points, managers, staff handling sensitive data of children and young people) have received relevant training and are well supported to enable them to perform their safeguarding duties, or are appropriately skilled and are part of appropriate support/learning networks. • For staff, there is evidence that the performance management process shows that training needs are regularly assessed and addressed appropriately. • Documented records of safeguarding inductions/briefing/ training kept to track list of attendees and attendance dates. Reasons should be documented for those who could not attend and personnel folders record that staff have undertaken safeguarding induction on joining and subsequent training appropriate to their role. Staff, Associates, children, young people and members of communities interviewed show appropriate safeguarding awareness and skills • A documented strategy for learning on safeguarding, with a plan for regular refreshing and updated where appropriate.
CS4.4. At all times, including in an emergency (subject to risk assessing the safety of this), Plan International staff, associates and visitors (engaging in Plan's work) are visibly identified as members of Plan.	• Evidence process for identification • Interviews with staff, associates and visitors should show awareness and implementation of this indicator • Interviews with children and families should show that appropriate identification took place.
CS4.5 Appropriate and regular information and training on safeguarding is provided to the different groups of children, young people and communities we work with. Should include how to identify specific risks they may face because of their environment or identity, their rights to be safe from abuse, what behaviours breach our safeguarding policy, what to expect from Plan staff and Associates and how to report concerns. This should be delivered in a manner that is meaningful for them and safe enough to allow the open discussion of issues or concerns they face.	• Interviews and documented evaluations with children, young people and communities corroborate that they have received appropriate information and training on safeguarding in a way that is safe and meaningful for them. • Samples of communication materials and modules on safeguarding for the target group is available. • Evidence of target group friendly training and communication materials is available • Documented attendance sheet shows diversity of groups

25 Plan Academy's Self-Directed Safeguarding Online Modules – may be used for this purpose
26 All Safeguarding Focal Points have access to the Safeguarding Training Resource Library which contains many resources available for safeguarding training at different levels and different audiences

RESOURCES WHICH AID THE IMPLEMENTATION OF THIS STANDARD

- Say Yes! To Keeping Children Safe with Plan communicated on Plan's external website [English, French, Spanish] – please adapt to suit your needs

- SCYPP leaflets, posters, publications and policy documents and etc. produced by various Plan offices covering various subject areas for different target groups (including child and reader friendly versions) and for different contexts (e.g. office, development, emergency) can be found in the SCYPP Standards and Implementation Resources Library under 'Resources for SCYPP : Core Standard 4 – Awareness, Communication and Education on Plan's Commitment to Keep Children Safe'

- Sample posters on Plan's SCYPP commitments for emergency context - for children [English, French, Spanish]; and for staff and associates [English, French, Spanish]

- Plan's SCYPP training toolkit – 'Helping Plan's people to become Active Protectors of Children and Young People' – [English, French, Spanish]. This toolkit may be used to deliver training of trainers for SCYPP Focal Points as well as workshops for different audiences (e.g. staff, managers and partners). It also contains suggested pre and post workshop evaluations. The complete toolkit can be found in the SCYPP Community Workspace Training Document library on planet– (accessible to SCYPP Focal Points only).

- Plan's Online Self Directed Safeguarding Induction Module – [English, French, Spanish].

- Sticks and Stones – Involving Children in their own Protection – contact Plan's Asia Regional Office

- The SCYPP Focal Point Network Team site houses the Training Document library (both are accessible to SCYPP Focal Points only) and contains a number of training materials from within and external to Plan, covering a variety of topics (e.g. Preventing Sexual Abuse and Exploitation, Positive Discipline, Safeguarding and Social Media, Child Participation, Child Participation in Child Protection, General Child Protection, Working with Partners) for various audiences including children. The site also houses Plan's a bank of case studies which may be used in workshops.



CORE STANDARD 5: ENGAGING SAFELY WITH CHILDREN, YOUNG PEOPLE AND COMMUNITIES

All types of engagement with, and inclusion of, girls, boys, children and young people in all their diversity, give priority to their best interest and safety. Behaviour towards girls, boys, children and young people in all their diversity is respectful, non-discriminatory and appropriate.

The behaviour of Plan staff and associates when engaging with children and young people is the single most important aspect of Plan's commitment to safeguard them. The Safeguarding Policy covers safeguarding children and young people in all their diversity from various possible sources of harm, but there is a particular concern to ensure that no one associated with Plan is in any way responsible for deliberately or inadvertently harming a child or young person. Plan has clear guidelines on acceptable and unacceptable behaviour. Staff and associates must work to these guidelines. It is also important that our staff and associates understand how their own conscious or unconscious biases can lead to harming children and young people of differing intersecting identities. For example, we may inadvertently communicate with girls with disabilities differently than girls without a disability, or we may respond inappropriately to a boy or girl who does not identify within gender 'norms' which can leave that boy or girl feeling humiliated or more isolated.

INDICATORS WHICH DEMONSTRATE THE ATTAINMENT OF THIS STANDARD

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS 5.1. Staff, Associates and Visitors visiting a country other than the one in which they are based are provided with written guidance on what is acceptable and unacceptable behaviour towards children and young people in the context of the country they are visiting, and are advised to adapt their behaviour as necessary[27].	• Visitors' information guide/briefing pack, includes references to safeguarding section of the CoC, and any behaviours/issues/norms specific to the local context. • Sample a number of visits – observation and/or interviews with staff/visitors should show compliance. • Visitors' log books show visitors who have been briefed on safeguarding
CS 5.2. Ensure that children and young people participating in Plan projects, activities and events do so in a way that is ethical, meaningful and transparent. That full consideration to their best interests, remains safe, inclusive, and transparent[28] and is subject to all relevant permissions and informed consents[29].	• Sample review of events show adherence to Plan's guidance. Proposal and authorisation process on 'Making Sure Events Involving Children and Young People are Safe'. • Interviews with responsible staff show awareness of process to be followed. • Interviews with children and young people (where possible and appropriate) reveal due process was followed • Post event evaluation report is available and has been disseminated to the relevant audience. Children and young people's views were sought.
CS 5.3. Events that involve the engagement/ participation of children and young people should be adequately, planned, prepared, thoroughly risk assessed, accompanied by a risk management plan, is appropriately chaperoned and supervised/ managed by staff adequately skilled in ensuring the wellbeing and safety of children and young people, all individuals involved are briefed, and the engagement is appropriately approved. This must be in line with Plan's guidance on 'Making Sure Events Involving Children and Young People are Safe'[30]	

27 No behaviour should be in violation of Plan International's policies.
28 As guided by Plan International's Making Sure Events are Safe for Children and Young People and the supporting resources
29 This means that Plan must disclose everything which is significant to the agreement to which the party/individual giving consent is agreeing to, and particularly where the child / young person is being asked to perform a particular role at the event and/or when that event takes place away from home.
30 Plan's Making Sure Events Involving Children and Young People are Safe' Pack contains useful checklists, templates, preparation, risk assessment, proposal and approval forms and a number of resources such as Consulting with Children on Sensitive topics. Your Event may not be approved if it has not been prepared in line with this guidance.

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS 5.4. Prohibit the exchange of personal contacts, including social media contacts, Skype, webcam etc. with any child or youth associated with Plan's work, unless explicitly and appropriately authorised[31] for business purposes in a manner which is in line with local Plan policies and procedures, has the consent of the child's parent/ guardian, or the youth and is supervised by the relevant line or supervising manager.	• Evidence that this is included in local procedures. • Interviews with staff, children and young people show awareness of this.
CS 5.5. Plan staff, associates and visitors are accompanied by a (or another) member of Plan staff from the host country at all times when visiting/ interacting with children and young people[32].	• Visitors log book may provide evidence. • Sample a number of visits – observation and/ or interviews with staff/visitors should show compliance
CS5.6. Children visiting Plan offices are accompanied by an adult (where appropriate) or have a letter authorising the visit (depending on the age of the child and local context), are adequately supervised at all times during the visit and are registered by the first point of contact (e.g. reception). Appropriate staff (Human Resources or Office Services for example) are informed if necessary	• Visitors log book may provide evidence. • Sample a number of visits – observation and/ or interviews with staff/visitors should show compliance
CS5.7. Create child safe environments in all activities involving children and young people by fostering and promoting positive relations between girls, boys, children and young people in all their diversity. This may involve supporting them to understand different gender and other identities, their own biases that may stem from this and how to behave with each other in a respectful and inclusive manner. Work with them to identify measures which will contribute to a safe environment fostering diversity and inclusion.	• Evidence of guidelines for adult-to-child/ youth behaviour and child/youth-to-child/youth behaviour (child and youth friendly) • Observation/interviews with staff, children and young people show awareness of this being followed. • A sample review of programme/activities involving direct work with/involvement with children and young people shows compliance. • Documented feedback/engagement process with children, young people and communities we work with, includes discussion and feedback on safeguarding measures (particularly those that impact them), to assess what is working and what needs to be done differently.

31 For Plan Staff: By the Office/Department Director for example, For Plan partner organisations, appropriate authorisation for exemptions to safeguarding procedure should be agreed with the partner and detailed in the agreement
32 Sponsor visits are covered in Business Standard 4: Safe Child Sponsorship

RESOURCES WHICH AID THE IMPLEMENTATION OF THIS STANDARD

- SCYPP Guidance - Making sure Events are Safe for Children and Young People [English, French, Spanish] this pack contains process and authorisation templates and flow charts, events preparation templates and a number of guidance and resources to ensure safe participation in events (e.g. training, guidance and roles and responsibilities for accompanying chaperones, safeguarding policy and presentation for the event, principles and ethics of participation, risk assessment guidance and post event evaluation questionnaire)

- SCYPP Guidance – Safeguarding Checklist – Consulting with Children on Sensitive topics [English, French, Spanish]

- SCYPP Guidance – Engaging Young People in Policy Development [English, French, Spanish]

- Sticks and Stones – Involving Children in their own Protection – contact Plan's Asia Regional Office

- SCYPP leaflets, posters, publications and policy documents and etc. produced by various Plan offices covering various subject areas for different target groups (including child and reader friendly versions) and for different contexts (e.g. office, development, emergency) can be found in the SCYPP Standards and Implementation Resources Library under 'Resources for SCYPP : Core Standard 4 – Awareness, Communication and Education on Plan's Commitment to Keep Children and Young People Safe'

- Plan's SCYPP training toolkit – 'Helping Plan's people to become Active Protectors of Children' – [English, French, Spanish accessible only to Safeguarding Focal Points] – Exercise 6.6 is dedicated to Risk Assessing Incidents Reported and Events involving Children.

The following documents are owned by the Global Influencing and Partnerships Department

- How to network safely and respectfully [English, French, Spanish]



CORE STANDARD 6: REPORTING AND RESPONDING TO SAFEGUARDING CONCERNS

Complaints mechanisms and reporting lines are appropriate for receiving reports of harm and abuse experienced by girls, boys, children and young people in all their diversity. Responses are survivor-centred, prioritise the best interests of the child or young person are timely and efficient.

Plan International's safeguarding approach is focused on the prevention of harm to children and young people in all their diversity, as well as to the wider community where relevant. However, there will be times when concerns or incidents occur — when a child or young person is harmed or at risk of harm because of the work of the organisation, or by a member of staff, volunteer or other associate. Reporting these concerns or incidents is a mandatory requirement in Plan. This can include cases of sexual exploitation and abuse of vulnerable people (known as PSEA – Protection from Sexual Abuse and Exploitation). It is also a requirement to report any protection or gender-based violence (GBV) issues being experienced by children or young people within families and communities where we work.

It is important that complaints mechanisms are established with the participation and input of different groups of girls, boys, children and young people, as well as communities, so they work for all children, young people and adults as necessary. This could include, for example, incorporating mechanisms for girls with communication disabilities to use for reporting; or ensuring that a girl or woman can report sexual exploitation and abuse in contexts where she might be seriously harmed if family members were aware of it. Another example could be supporting a young man to report rape by a community elder without risk of disbelief or ridicule.

In the event of an emergency, existing complaints and reporting mechanisms will need to be reviewed at the onset, to make sure that these mechanisms still work in the changed circumstances[33]

INDICATORS WHICH DEMONSTRATE THE ATTAINMENT OF THIS STANDARD

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS6.1. A reporting process is identified and publicised for each geographic location which is in line with Plan's global procedures for reporting and responding[34]. This should include the identification of appropriately skilled staff with clear roles and responsibilities for receiving and responding to reports, mapping of the external protection context (see indicator CS 2.1), compliance with local statutory requirements for reporting serious or criminal cases, the establishment of appropriate referral mechanisms, guarantee of confidentiality and ensuring the welfare and safety of all parties involved.	• Evidence of reporting process for each geographic location which complies with indicator (link to attainment indicator CS 2.1 and 2.3) • Evidence of appropriate briefing and distribution to staff (e.g. on intranet/included in Safeguarding workshops/staff meetings etc). • Interviews with staff show awareness and ability to use. • Identified staff are appropriately trained and skilled to receive and respond to reports. • Observation and interviews with staff show awareness and compliance.

33 For instance, the sudden unavailability of previous identified service providers, communication channels or staff as well as the change in accessibility to certain areas may affect the functionality of both complaint and/or reporting mechanisms.
34 Plan International's Global Guidance on Reporting and Responding to Safeguarding Concerns

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS6.2. Children, young people, families and communities that we work with are consulted and involved in the development of complaints and reporting mechanisms to ensure they are relevant, safe, user friendly and ensure their best interest. This should specifically take into account risks that may arise as a result of their intersecting identities and how they may be treated by service providers and agencies within the referral mechanisms.	• Documented child and/or user friendly complaints and response mechanisms (in appropriate language and format) and evidence of consultation and distribution processes • Interviews with children, young people and families, indicate awareness of the complaints mechanism, how to make complaints, and confidence in using it. • Evidence of feedback from specific groups of children and young people regarding the workability of reporting mechanisms for diverse groups faced by other forms of risks in relation to their diversity • Documented risk management strategy for reporting safeguarding concerns on particular groups of children and young people • Interviews with service-providers and members of referral pathway indicate awareness of how to treat children and young people of diverse groups in line with their best interest and safety.
CS6.3. Staff and visitors to each specific location are provided with a briefing and/or written guidance on the process for reporting and responding to child safeguarding or protection concerns at that particular location.	• Documented evidence that visitors receive and sign up to safeguarding and codes of behaviour (e.g. visitors safeguarding leaflet, acknowledgment forms back copies of signed leaflets). Link to CS 3.1
CS6.4. Respond to all reports or concerns in line with the local reporting and responding procedures (see CS 6.1), ensuring the responses are safe and survivor centered. In particular it must be ensured that as a minimum: **• The needs of the survivor/sufferer of the incident are prioritised** **• Immediate action should be taken, if necessary, to address protection and safety concerns of the survivor/sufferer of the incident/reporter/witnesses.** **• Confidentiality is maintained and information shared on a need-to-know basis and in line with the established local procedures. Staff are aware that breach of information sharing will result in disciplinary action.** **• Criminal offence is referred to relevant local/ statutory authorities responsible for receiving and investigating such reports in line with local reporting procedures.** **• Decisions made to not report serious incidents to the authorities e.g. where there is doubt about integrity and/or competence of such bodies, or reporting may lead to violation of the best interests of the child or young person; require the presentation of a business case to be submitted to Senior Management at the Global Hub for review and authorisation.**	• A sample review of safeguarding incidents reported show compliance • Documented rationale and appropriate senior management authorisation for deviations from normal processes. • Interviews with managers, safeguarding Focal Points and other responsible staff show awareness of procedures to be followed. • A sample review of investigation reports provides evidence that due process has been respected. • Sample review of incidents reported /investigated provides evidence that recommendations on improved practices have been made where appropriate. In addition there is a documented process of follow up on the implementation of endorsed recommendations. • Clear notes on fact-finding exercise preceding a full-fledged investigation is available • Link also to C.S 1.7

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
CS6.5. Where investigations are carried out on safeguarding breaches and concerns, this is guided by Plan's global guidance on the same[35] ensuring that as a minimum: • **there are clearly defined roles and responsibilities for carrying out and managing the investigation,** • **a basic fact finding exercise precedes the investigation in order to decide on next steps, a risk assessment and management plan is in place, investigations are only conducted by skilled personnel and the outcomes of any investigation process and any subsequent follow up processes recommend improvements to safeguarding practices.**	• Documented criteria for designated personnel with competence to conduct an investigation process. • Sample review of incidents reported/investigated provides evidence that recommendations on improved practices have been made where appropriate. In addition there is a documented process of follow up on the implementation of endorsed recommendations (Link to CS 1.8).
CS6.6 There is a process for formally recording, storing and disposing of reports on safeguarding issues.	• Evidence that safeguarding incidents/ investigations are formally recorded and reports are kept safely and can only be accessed by appropriate staff.

RESOURCES WHICH AID THE IMPLEMENTATION OF THIS STANDARD

- Global Guidelines Reporting and Responding to Safeguarding Issues in Plan [English, French, Spanish]
- SCYPP Guidance On: How to Conduct a Mapping of the External Child Protection Context and Resources and mapping template. [English, French, Spanish]
- Guidelines for Carrying out Administrative Investigations – [English, French, Spanish]
- List of Plan staff trained in the global workshop on Carrying out Administrative Investigations
- List of Plan staff trained in the global workshop on Managing Complaints and Investigations

Documents owned and produced by Plan GH's Disaster Response Management Department

- Child Friendly Complaints and Response Mechanisms Guidance [English, French, Spanish]

Documents owned and produced by Plan GH's Legal Department

- Retention, Storage and Destruction of Key Documents Policy [English]– document owned by Legal and guidelines
- Data Protection Policy and Guidelines [English]

35 Plan International's Global Guidance on Carrying out Administrative Investigations into Safeguarding Breaches and Concerns



BUSINESS STANDARD 1: SAFE PARTNERS AND EXTERNAL STAKEHOLDERS

Plan's partners[36] and other external stakeholders have the commitment, skills and capacity to safeguard girls, boys, children and young people in all their diversity.

Plan works directly, and indirectly, with partners across the world to achieve its long-term mission to 'strive for a just world that advances children's rights and equality for girls'. Plan has a responsibility to make sure that all partners, and other stakeholders it works with, are able to safeguard children and young people in all their operations. Plan acknowledges that its partners vary in terms of the size and nature of their operations, and in their existing levels of capacity in relation to safeguarding; there may also be imbalances of power between Plan International and its partners which need to be taken into account. The type of relationship Plan has with partners has a bearing on how closely the partner and Plan's safeguarding commitments and practices align. The intention is to ensure that all partner organisations are equipped to identify, prevent and respond to safeguarding risks and demonstrate good practice in working with girls, boys, children and young people in all their diversity. We will also strive to work with partners on building the capacity of our respective organisations in relation to safeguarding, gender equality, intersectionality and non-discrimination, recognising that some partners may have specific expertise and be more effective than Plan in certain aspects, for example where issues/risks arise for children or young people because of their gender and/or other aspects of their identity.

During emergencies particularly, it is important to work strategically and coordinate with relevant stakeholders who can support Plan's safeguarding approach.

INDICATORS WHICH DEMONSTRATE THE ATTAINMENT OF THIS STANDARD

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS 1.1.All potential partners are assessed on their capacity and commitment to safeguard girls, boys, children and young people in all their diversity and this informs the decision on working with the partner and the level of support required[37].	• Sample partners engaged and review process of assessing partner's commitment and capacity to keep children safe. Using the Partner assessment tool as a guide, review adequacy of the assessment. Review how it informed partner selection process.
BS 1.2.Partnerships include reference to safeguarding and state that a violation and persistent failure to adhere to agreed safeguarding requirements[38] (see BS 1.3) may result in the termination of the agreement or contract. A copy of the safeguarding policy is included as an addendum to the agreement.	• A sample review of partner agreements should show compliance with this indicator. Contract must be in line with global templates on the same. • Partnership contract includes requirements/ clauses for safeguarding

36 For the purposes of these standards, partners are those organisations with whom we are working collaboratively to increase our impact e.g. NGOs, Government bodies or funders, interagency partnerships or consortiums

37 As per Safeguarding Policy requirements, the Partner may either adhere to Plan's Safeguarding Code of Conduct or other appropriate guidance developed by a Manager at the relevant Plan International and as relevant to their engagement using Plan's Safeguarding Code of Conduct as a guide; or comply with their own Code of Conduct, provided the contracting Manager ensures that it complies and is consistent with this Global Policy

38 Where appropriate you may use the Child Rights and Business Principles developed by UNICEF, the UN Global Compact and Save the Children See http://childrenandbusiness.org/

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS 1.3. It is agreed (documented and reflected in the agreement or as an addendum) with partner/s the: • **Codes of conduct in relation to interaction with children and young people[39]** • **Minimum safeguarding measures/ requirements that the partner will comply with in relation to the work they are engaged in with Plan, and an assessment of how these requirements will be met. (Where Plan is the lead/donor agency it reserves the right to verify that agreed requirements have been implemented).** • **Arrangements for reporting and case management between Plan and partner/s, appropriate to the partner relationship and the individual partner's safeguarding measures. This may include joint protocols for reporting where appropriate.**	• A sample review of partner/s interagency/ consortium agreements should show compliance with this indicator. • The minimum safeguarding requirements should show links to the safeguarding assessment of partner (refer to indicator BS 1.1) and the nature of the work they are engaged in with Plan.
BS 1.4. Safeguarding implementation (particularly in relation to minimum safeguarding requirements agreed at the outset of the agreement – see Attainment indicator BS 1.3) forms part of the regular partner review process or as agreed in interagency/consortium agreement.	• For partners sampled evidence that there have been regular reviews of, and reporting on, the progress of implementing the safeguarding requirements agreed and other general safeguarding issues and concerns and support requirements have been appropriately addressed.
BS 1.5. Corporate partners are assessed on their commitment and capacity to keep children, young people in all their diversity safe, taking into account the nature of work in which they are engaged. Agree on how safeguarding will be reflected in agreements[40].	• Sample corporate partners engaged shows attainment of this indicator.
BS 1.6. The partnership arrangement is used as an opportunity to build Plan and/ or the partner's capacity (drawing on partner's capacity assessment – see B.1) to safeguard girls, boys, children and young people in all their diversity. Capitalise on respective knowledge, skills and expertise in safeguarding.	• An action plan/ capacity building support plan for partner is available • Documented reports on capacity building/support provided. • Interviews with selected partners and programme staff should also provide evidence and an indication of adequacy of the support given.

RESOURCES WHICH AID THE IMPLEMENTATION OF THIS STANDARD

- Visit the SCYPP Community Workspace Training Document library on planet – (accessible to SCYPP Focal Points only) for safeguarding training tools for partners.
- Plan's SCYPP Partner Assessment Tool [English, French, Spanish].
- Joint Reporting Protocols for SCYPP Breaches – for partner arrangements [in English only]
- Local Partnership Agreement [guidance note, information sheet, long form and short form templates] – documents produced by the Global Hub Legal Unit

39 As per Safeguarding Policy requirements, the Partner may either adhere to Plan's Safeguarding Code of Conduct or other appropriate guidance developed by a Manager at the relevant Plan International and as relevant to their engagement using Plan's Safeguarding Code of Conduct as a guide; or comply with their own Code of Conduct, provided the contracting Manager ensures that it complies and is consistent with this Global Policy

40 Where appropriate you may use the Child Rights and Business Principles developed by UNICEF, the UN Global Compact and Save the Children See http://childrenandbusiness.org/



BUSINESS STANDARD 2: SAFE PROGRAMMING, INFLUENCING, MONITORING, EVALUATION AND RESEARCH

Programming, influencing, monitoring and research work — including all such work undertaken in emergency/humanitarian settings is designed and delivered in a manner which is safe for girls, boys, children and young people in all their diversity.

Safeguarding in programming, influencing, monitoring and research work requires recognising inequalities within the communities in which we work and how these may determine the safety of those participating in, or impacted by, our programmes and campaigns. The aim is to identify and mitigate, or minimise, risks arising from the organisation's work for all adults, children and young people, particularly recognising those that stem from, or are exacerbated by, social structures, bias and discrimination.

Safe programming involves supporting the empowerment and inclusion of girls, women, and other excluded groups in the programming process, in a manner that promotes equality, equity and ultimately their increased safety and protection. It also recognises that individuals may identify themselves in a number of ways which intersect with one another[41] and impact on how they can safely participate in programmes or influencing work and how they experience potential harm arising from programme or campaign outcomes.

INDICATORS WHICH DEMONSTRATE THE ATTAINMENT OF THIS STANDARD

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS2.1 In developing any programming, influencing or monitoring evaluation and research (MERL) interventions full consideration is given to the mapping of the local protection context (main protection risks for girls, boys, children and young people in all their diversity, situation of their families, prevailing norms within the community that may assist or hinder safeguarding, legal and social welfare provision, implications if the project engages virtual platforms or digital communications and safety assets). This informs all stages of the cycle of the intervention. (refer to Core Standard 2.1).	• Sample review of intervention documentation should show compliance with this indicator. • Interview with technical programme staff depicts the use of local mapping at all stages of the intervention cycle and informs a 'go' or 'no go' for proposal writing stages.
BS2.2 Where possible, community participation processes, including consultations with the different groups of community members and children and young people (bearing in mind differing identities) should be adopted to include specific discussions of risks from their perspective, and assessing and minimising the risks presented by the potential programme/ influencing/MERL intervention objectives and activities.	• There are documented records of planning and monitoring activities with children and families and that these provide evidence of discussion and consultation on protection aspects of the project/ programme. • There is evidence that their views have been considered in the programme/project design. Interviews with children and families may provide further verification

41 Identities can include gender, race, ethnicity, class, mental ability, physical ability, sexual orientation, tribe etc.

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS2.3 The identification, analysis and management of safeguarding risks is included in the regular risk management process at all stages of the programme/influencing/ project/MERL intervention cycle ensuring safe environments and the safeguarding of girls, boys, children and young people in all their diversity[42]. • **Consider a range of interventions or activities that can deliver the objectives of the work safely and ensure a safe environment.** • **Ensure the design and is flexible enough to be adapted if found unsafe during implementation.** • **Identify and prepare indicators which can determine whether the programme/project/ campaign is being, or has been, delivered safely.** • **Regularly risk assess all activities that children and young people will participate in, ensuring that this is done in consultation with them and the assessment captures the risks and vulnerabilities that might emerge during the activity as a result of how they identify themselves.** • **Design closure strategies that include an assessment of all potential risks of the closure for girls, boys, children and young people in all their diversity who have been involved in or impacted by that programme/project/campaign.**	• Documented risk assessment and management plans are available for sampled programmes/ projects and this links to the mapping of the external context. • Risks identified for the different target groups of children and young people and appropriate mitigation strategies are in place. • Review of interventions risk management documents for sampled interventions shows safeguarding indicators agreed for the interventions • Evidence that staff of interventions are capacitated to assess risks and involve children and young people in the assessment exercise to address their risks and vulnerabilities. • Documented project samples depict the process of ensuring safe programming and influencing work through risk assessment and management for girls, boys, children and young people in all their diversity from design to closure. • There is regular review/update at each stage of the programme/project cycle.
BS2.4 Regularly monitor and evaluate whether the programme/project/influencing/ MERL intervention is being delivered safely. Consideration is given to the implementation of additional child protection measures which may be necessary to address any new, emerging or unexpected child protection issues identified.	• Evidence that impact and effectiveness of safeguarding measures has been incorporated into the monitoring and review process for the programme/project (impact/quality) and that any issues have been appropriately addressed.

42 Plan International's Safe Programming and Influencing Toolkit provides full guidance on this and safeguarding trigger questions for each stage of the cycle.

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS2.5 Work plans and budgets should appropriately consider the cost of safeguarding risk management strategies, safeguarding improvement work as well as the selection and safeguarding capacity building of all key stakeholders[43] (staff, community, government, partners, contractors etc.) to the work. (Note: Where a grant is being applied for and the resources required for safeguarding is over and above the standard measures Plan would deploy (for example, where the work is particularly high risk or where the safeguarding capacity of proposed partners/key stakeholders is especially low) then this should be incorporated into the proposal).	• Sample review key stakeholders and view selection process • Sample risk management strategies and ensure they are appropriately resourced • View grant proposals

RESOURCES WHICH AID THE IMPLEMENTATION OF THIS STANDARD

- Plan's Safeguarding in Programming and Influencing work: Guidelines for Ensuring Programmes and Influencing Work Are Designed And Delivered In A Way That Is Safe For Girls, Boys, Children and Young People In All Their Diversity [English, French, Spanish]

- Plan's Safeguarding in Programming and Influencing work: Training Materials /Active Implementation Guide; Ensuring Programmes and Influencing Work Are Designed And Delivered In A Way That Is Safe For Girls, Boys, Children and Young People In All Their Diversity [English, French, Spanish]

- SCYPP Guidance On: How to Conduct an Assessment of External Child Protection Context and Resources. "The Local safeguarding Mapping Exercise"[available in English, French, Spanish]. Appendices to the guide can be found in the SCYPP Standards and Implementation Resources Library under the Core Standard 2 – Managing Safeguarding Risks in Plan's Business Areas

- The Minimum Standards for Child Protection in Humanitarian Action Handbook", http://cpwg.net/minimum-standards/#sthash.s6qmXzTu.dpuf

Documents owned and produced by Plan IH's Legal Department

- Retention, Storage and Destruction of Key Documents Policy [English]– document owned by Legal

- Data Protection Policy and Guidelines (in development and led by IH Legal Department).

The following documents are owned by the GH Research Department and is therefore not housed in the SCYPP Standards and Implementation Manual Resource Library

- Framework for Ethical Monitoring, Evaluation and Research Guidelines which incorporates all safeguarding requirements for Monitoring, Evaluation, Research and Learning interventions

43 Note the selection and capacity building of stakeholders should meet requirements under CS3: Awareness, Communication and Education on Plan's Commitment to Safeguarding, BS1: Safe Recruitment, Selection and Engagement with Plan and BS4: Safe Partners and External Stakeholders as appropriate



BUSINESS STANDARD 3: SAFE PUBLICITY, MEDIA AND COMMUNICATIONS

Publicity, media and communications preserve the privacy and dignity of girls, boys, children and young people in all their diversity, ensuring they are not harmed or exposed to risk through power imbalances or reinforcing gender, identity or other stereotypes

Media, publicity and communications work that features or involves children and young people encompasses a range of activities. These can include media and publicity visits from a wide range of people such as journalists, researchers, celebrities and other visitors, interviews with children and young people or opportunities for them to speak on public platforms at conferences, and images of, and information on, children and young people being used to illustrate Plan's work or raise funds.

The inclusion of children and young people in media, publicity and communications work requires a considered approach. There is need for careful management when including, or providing information on girls, boys, children and young people in all their diversity and deciding how this is used to represent Plan's work. Those involved in media, publicity and communications work need to be particularly mindful of the impact of power imbalances when making decisions on how children and young people are involved or featured. There is tension between being bold and impactful in messaging, and being safe and ethical; this needs to be recognised.

In times of emergency, when children's vulnerability is increased, it is crucial to ensure that the acquisition/use of data (including images) of children or young people continues to keep them free from harm and does not involve their exposure to extra risks, despite the pressure to present the often devastating impact of emergencies on children and families.

INDICATORS WHICH DEMONSTRATE THE ATTAINMENT OF THIS STANDARD

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS3.1 When risk assessing media and communications work, assessment and mitigation strategies should take account of particular risks or vulnerabilities associated with girls, boys, children and young people in all their diversity, including the risk of reinforcing negative stereotypes.	• Documented risk assessments and risk management strategies identifying specific risks in accordance with the profile of the children and young people engaged • Documented monitoring and follow up on actions identified to address risks.
BS3.2. The desired objectives of the media, publicity or communications work and the type of message that might achieve this are clarified. A range of options and opportunities that will achieve the objectives are identified and risk assessed for their impact on the girls, boys, children and young people in all their diversity who are featured in, or affected by, the work.	• Sample review of documentation and interviews with relevant staff should show attainment of this indicator
BS3.3. Ensure that individuals' and organisations' (who must be appropriately vetted and briefed in line with Core Standard 2 and Business Standard 1) contracted to deliver media, publicity or communications work – or those who might be doing so as part of an event – understand Plan International's commitment to, and their responsibilities for, safeguarding children and young people in all their diversity and what this means for how children and young people are involved and how they are featured in interviews, media publicity, news etc. (Use and disseminate the Safeguarding in Media Guidelines as appropriate to aid this work)	• Sample review media/communication visits and link to verification under Core Standard 2 and Business Standard 1 • In addition procedures provided to staff/ associates are specific to the event • Interviews with staff and associates (if possible) for the sampled event show compliance with indicator

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS3.4. Media/publicity visits include a Plan member of staff or associate whose role includes ensuring the upholding of Plans safeguarding commitments and safeguarding media guidelines requirements are fully understood, and adhered to. In addition, their primary purpose is ensure that the best interest of the child/ren and/or young person/ people and their protection remains a priority over the opportunity for advocacy on child/ youth issues.	• Documentation on sample media/communication visits/activities outlines who accompanied the visit and their role. • Interview with responsible staff show awareness of their role and responsibility
BS3.5. Prepare children and young people, their families and communities on what to expect when involved in media and communications work, what will happen in media interviews, what is acceptable and unacceptable, what they can do if they do not feel comfortable.	• Documented briefing sessions or briefing presentation/documentation or distribution list (if available) is available and reviewed as appropriate (child, youth reader and user friendly) – in particular it details what to expect and how to report concerns. • Interviews with children/young people show awareness of this
BS3.6. Explore with children and young people of different groups (including disadvantaged groups), how they would like to be represented, and what kinds of stories they want to tell about themselves. Discuss with children and young people, families and communities the various implications of using the images, of giving an interview and publishing a story, particularly where there could be a negative impact on a child or young person or on their identity, and how they wish to be represented. Support them in their decisions on what they want to say and how they wish to engage bearing in mind the organisation's duty of care, their best interests and protection.	• A sample review of media events documentation should show compliance with this indicator i.e. documented list of who attended briefings and what information was provided / or • Briefing presentation/documentation is available and reviewed as appropriate
BS3.7. Children and young people are respected and their safety and protection is not compromised when obtaining and using information on and images of them. Particular attention is paid to ensuring that a) personal information which could lead to the identification of a child/young person is never used[44]; b) images/pictures of children and young people show them suitably dressed and never in poses that could be interpreted as sexually suggestive or in ways that impact negatively on their dignity or privacy and c) anonymity[45] is prerequisite where the story is sensitive and the child/young person is below 18 (above this age is based on a through risk assessment).	• A review of media material (e.g.: documents, internet, intranet, intranet, publications) show compliance with this indicator. • Interviews with responsible staff (e.g. in media, communications) show awareness of this requirement

44 Ensuring the child or young person's face is not displayed or represented in any way that may lead to identification or concealing/changing names and locations (where names and locations have been changed a disclaimer should be used for example - 'The names and location have been changed for child protection and privacy purposes') or not using the name in in conjunction with other personal information (e.g. community name, birth date, names of family members, school)

45 Ensuring the child or young person's face is not displayed or represented in any way that may lead to identification or concealing/changing names and locations (where names and locations have been changed a disclaimer should be used for example - 'The names and location have been changed for child protection and privacy purposes') or not using the name in in conjunction with other personal information (e.g. community name, birth date, names of family members, school)

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS3.8. The informed consent[46] of the child/young person and/or parent/guardian where applicable is always obtained before recording information or obtaining images and their intended use(s) (including where this information/image will be displayed) explained.	• A sample review of consent forms for recording/ photograph/interview or image which meets the requirements of the indicator. • Sample review media activities/events and review consents obtained for child data associated with the event/visit.
BS3.9. The office ensures that staff and visitors are aware that the taking of images of children and young people for personal use is discouraged. If it is proposed to obtain images of children for personal use consent must be sought from the office and in line with the above standards. This must be done in a manner that respects the rights of children, young people and their family and in no way puts them in situations of risk or harm, whether intended or unintended. In addition images of children and young people associated with Plan International taken for personal use should not be uploaded to non-Plan International social media pages without the full and explicit consent of Plan International, nor must personal devices be used to collect work data on children and young people associated with Plan International[47]	• Review of staff and visitor safeguarding briefing materials show attainment of this indicator • Interviews with staff and associates show awareness of this requirement.

RESOURCES WHICH AID THE IMPLEMENTATION OF THIS STANDARD

Safeguarding in Media Guidelines [English, French, Spanish] Documents owned and produced by Plan's Global Communications Department

- Global Length of Image Use Guidelines [English]
- Global Media Visit Guidelines [English]
- Global Social Media Guidelines [English]
- Media Consent Form – [available in English only]

Documents owned and produced by Plan IH's Legal Department

- Retention, Storage and Destruction of Key Documents Policy [English]– document owned by Legal
- Data Protection Policy and Guidelines (in development and led by IH Legal Department).

SCYPP Guidance - Making sure Events are Safe for Children and Young People [English, French, Spanish] Note: this is listed as a resources primarily under Core Standard 5 – Engaging Safely with Children, Young People and Communities.

SCYPP Standards and Implementation Resources Library : under Resources for SCYPP:

- Core Standard 4: Awareness, Communication and Education on Plan's Commitment to Keep Children and Young People Safe', you will find SCYPP leaflets, publications and policy documents etc. produced by various Plan offices covering various subject areas for different target groups
- Business Standard 4: Safe Child Sponsorship you will find Sponsor Visit/Visitors Guides and Brochures produced by various Plan offices.
- Business Standard 3 – Safe Publicity, Media and Communications; you will find various media guidelines/procedures produced by various Plan offices and external organisations
- Plan's SCYPP training toolkit – 'Helping Plan's people to become Active Protectors of Children and Young People' –[English, French, Spanish accessible only to SCYPP Focal Points] – Exercise 6.6 is dedicated to Risk Assessing Incidents Reported and Events involving Children.

46 This means that Plan must disclose everything which is significant to the agreement to which the party/individual giving consent is agreeing to.
47 Plan International will seek informed consent as appropriate from the child or young person and parents or guardians where applicable.



BUSINESS STANDARD 4:
SAFE CHILD SPONSORSHIP

Child sponsorship programmes support the best interests of the child. Information on the child and their family, as well as contacts between sponsors and children, are handled sensitively and appropriately, to ensure they remain safe for both the child and the adult.

Plan International's sponsorship model brings many benefits to children, families and communities and to the organisation itself and is central to
the work of Plan. However, inherent in sponsorship models is an imbalance of power between the sponsor and sponsored child. There may be a divisive effect on the child, family or community, as well as potential safeguarding risks where individuals use sponsorship as an avenue to enter into the organisation and gain access to/ establish relationships with children[48] .

It is important that staff and sponsors understand this and that the impact of the sponsorship programme is regularly monitored in order to ensure any negative impacts on the child/children are addressed and the best interests of the child always remain a priority.

Plan International takes every reasonable precaution to ensure children are not harmed through involvement in its sponsorship programme, by employing robust engagement processes for sponsors (e.g. screening of sponsors, ensuring understanding of, and sign up to, the safeguarding policy and appropriate behaviours for interacting with children). Additional measures take into account the specifics of the sponsorship model, such as ensuring that all contact is supervised, whether this be via correspondence or visits.

INDICATORS WHICH DEMONSTRATE THE ATTAINMENT OF THIS STANDARD

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS 4.1 On making initial enquiries about child sponsorship with Plan, sponsors receive an explanation of Plan's Safeguarding Policy and appropriate guidelines[49] to ensure the sponsorship relationship remains safe for both the child and the adult and they can report any concerns they may have.	• A review of sponsor information/joining/welcome pack shows compliance along the lines detailed in indicator and footnote.
BS 4.1. It is ensured that individuals taking out sponsorship with Plan are appropriate to do so and acknowledge receipt and acceptance of the sponsorship and safeguarding rules and regulations[50] .	• Documented process/evidence and/or interviews with sponsorship staff show that offices do everything within their control to ensure that individuals taking out or continuing sponsorship are suitable to do so e.g. has no convictions of crimes against children or are in prison for any type of crime (including awaiting trial)
BS 4.3. All unsupervised contact between sponsor and sponsored child is prohibited. This may include but is not limited to visits and any form of communication via social media, emails, letters etc., as well as exchange of personal contact details between children and sponsors. Breaches are reported.	• Sample interviews with staff, sponsored children and community should show awareness of this. • Child and/or family friendly communication on this and where to report concerns (e.g. briefing note)/ proof of communication on this to children and families (e.g. meetings held, list of attendees). • Where there have been unsupervised contact evidence of completed incident reporting form and action taken.

48 Through some high profile cases within the industry. Please contact your lead Safeguarding Focal Point for more information.
49 Such guidelines would include but is not limited to guidance on appropriate behaviour protocols, how Plan manages their contact (including visits - prohibition of unannounced visits or visits to the home) and correspondence with children, appropriate and permissible uses of images of and information on the child, prohibition of the publication of children's information on personal websites and the complaints procedures. In addition sponsors should be aware that Plan reserves the right to carry out background checks (or suitable alternatives) at any time to satisfy its child safeguarding obligations.
50 Whether there is a written terms of engagement or not, sponsors commit to these policies by engaging with Plan (i.e. acceptance by conduct).

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS 4.4. Sponsor visits are conducted in accordance with safeguarding procedures detailed in the sponsorship manual and procedures for pre, during and post-visit. These include: • **background checks/screening of visiting sponsors,** • **the visitors' information guide including appropriate behaviour protocols[51] ,** • **how to host the visit in a safe and protected space (hosting visits in the home of the sponsored child is prohibited).** • **The recording and retention of all post visit reports.**	• A sample review of sponsor visits provides evidence that procedures for visits as detailed in the sponsorship manual are being followed and that there are documented post sponsor/ visitor reports showing debriefings (with sponsor, sponsored child and family) and any issues appropriately addressed.
BS 4.5. Staff, sponsors, community and children are appropriately briefed on Plan's zero tolerance to unannounced visits. Unannounced visits are treated and reported in line with the Sponsor Visits to the Field Policy and guidance on dealing with such visits are made available for staff as well as for children/families and the community	• Sample interviews with staff, sponsored children and community should show awareness of this. • Proof that relevant staff have received in depth briefing on its implementation of policy and procedures • Child and/or user friendly version of the policy and where to report concerns /or other such document (e.g. briefing note)/ proof of communication on this to children and families (e.g. meetings held, list of attendees). • Where there have been unannounced visits, evidence of completed incident reporting form and action taken in line with policy.
BS 4.6. All (100%) sponsor to sponsored child communication, and vice versa, is screened for content which is inappropriate or compromises the dignity, privacy and safety of children (including details which can lead to identification and location)[52] and any issues or incidents are documented and reported for follow up action[53].	• Documented guidelines for those checking correspondence on what is appropriate and inappropriate content (in appropriate language). • Interviews with individuals responsible for checking correspondence show awareness and that they are have been appropriately briefed or trained • Sample review of correspondence allowed reveals no inappropriate content or inappropriate content is logged due process followed.

51 Appropriate behaviour protocols during the visit, appropriate and permissible uses of stories, images of and information on the child, prohibition of the publication of children's information on personal websites
52 Global safeguarding Unit Guidance on Reviewing Correspondence Between Sponsor and Sponsored Children provides guidance on this
53 Sponsor communication should be screened by the National Offices. Sponsored Child communication should be screened by the Country Offices

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS 4.7. Consideration of, and approval of, requests for continued contact on graduation (i.e. when the sponsored child reaches the age of 18 years) are the exception and must be processed in accordance with the established sponsorship safeguarding framework for reviewing and risk assessing 'Continued Contact On-Graduation' (this includes requirements to risk assess the request, vetting the sponsor, and ensuring the 'child' and family are aware of the implications of any continued relationship). **Where the request for continued contact is assessed as favourable, and successfully processed ensure that the personal contact details of sponsor are provided to the graduated sponsored child (and never the other way round).**	• Sample review of request for continued contact between sponsor and graduated sponsored child or vice versa show compliance with indicator.
BS 4.8. Ensure that risk assessments undertaken for piloting any new models of sponsorship (e.g. ICT systems for sponsored schools, digital communication, and community sponsorship) include an assessment of safeguarding risks. These should be closely monitored and reviewed.	• Documented risk assessments are available including how identified risks will be managed. • Documented monitoring and follow up on actions identified to address risks.

RESOURCES WHICH AID THE IMPLEMENTATION OF THIS STANDARD

- Sponsor Visits to the Field Policy and Guidelines
- SCYPP Guidance: Reviewing Correspondence Between Sponsors and Sponsored Children' [English, French, Spanish]
- Process for reviewing request for 'Contact On Graduation' [English]
- Frequently asked Questions and Answers in relation to Plan's Global Policy on Safeguarding Children and Young People [English, French, Spanish])

SCYPP Standards and Implementation Resources Library : under Resources for SCYPP:

- Core Standard 3: Awareness, Communication and Education on Plan's Commitment to Safeguarding', you will find SCYPP leaflets, publications and policy documents etc. produced by various Plan offices covering various subject areas for different target groups
- Business Standard 5: Safe Child Sponsorship you will find Sponsor Visit/Visitors Guides and Brochures produced by various Plan offices.

Documents owned and produced by Plan GH's Legal Department

- Retention, Storage and Destruction of Key Documents Policy [English]– document owned by Legal and guidelines [English]
- Data Protection Policy and Guidelines



BUSINESS STANDARD 5: IT AND DIGITAL SAFEGUARDING

Plan's use and promotion of digital platforms to capture and present its work and encourage children and young people in their use of technology ensure that girls, boys, children and young people in all their diversity are safeguarded.

The speed, convenience and benefits of new technologies, and the number of new forums available to engage people and issues globally, is ever-changing for both Plan and the children and communities where we work. Plan uses a number of social networking forums to share our work, we know that our supporters also access these forums and there is a rapid increase in the number of children and young people across the world who are using these, and other, digital platforms.

The digital world is a vast and unregulated space, and this poses potential risks for the children we work with and for. Children and young people from disadvantaged groups may be particularly vulnerable to abuse via social media, for example based on their gender and/or other aspects of their identity.

Power imbalances are also at work which can lead to children and young people getting involved in risky situations. We need to take the necessary measures to control how we store information and what we place on our own digital platforms. We will make our supporters more aware of the potential risk that such platforms can pose[54] to children and young people in all their diversity, and that we support children and young people to understand how to stay safe online.

INDICATORS WHICH DEMONSTRATE THE ATTAINMENT OF THIS STANDARD

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS 5.1 Data relating to children and young people (including that used on Plan's social media sites) is collected for a specific authorised use, only used as intended with the appropriate informed consent[55] and protected in accordance with Plan International's Data Protection, Privacy and Retention Policies (how the information must be held, for how long, who should have access and what can be done with the information) and applicable local laws.	• Appropriately signed consent forms. • A sample review of consents obtained should show use only as intended and that use is in line with policy and procedures. • Plan's policies on Data Protection, Privacy and Retention are complied with
BS 5.2. Ensure that information that identifies children, young people and/or families is not disclosed or accessed by unauthorised persons or without the appropriate and informed consent whilst prioritising the best interests and protection of the child/young person/ individuals.	• Check access to personal information on families and children is secure. • There is a system in place to track who has access to information and documented follow up on anomalies
BS 5.3. Develop and implement local policies and/or procedures that govern the safe collection, storage, retention, handling (including transmission) and disposal of child sensitive data/information (including all sponsorship communications, images and consent forms, information relating to safeguarding incidents or concerns)	• Office complies with Global IT policies and or local policies and procedures are guided by global policies • Testing of data held shows compliance to the indicator (refer to implementation guidance)

54 From Plan Australia's Ensuring Child Protection - section Social Networking Media
55 Departments such as sponsorship and media/communications have consent forms which are specific to their activities. Please contact these departments for the appropriate forms.

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS 5.4. Develop and implement local policies that expressly prohibit staff from browsing or viewing websites that contain pornographic, offensive or harmful material, and/or downloading, displaying, storing, printing, distributing, or re-distributing any such material, in line with Plan's Global ICT Policies[56]	• Documented local policy and procedures exist • Interviews with managers/staff responsible for receiving reports/with safeguarding Focal Points show awareness of procedures to be followed.
BS 5.5. Breaches to the security of child sensitive data (electronic information, printed information, or knowledge information) and child and/or youth sensitive data loss (including information that may be on lost assets e.g. on laptops, thumb drives, etc.) are reported and acted on immediately.	• Documented procedures (showing process for reporting and acting upon breaches). • Incident/Breach Reports (showing action taken and follow through on breaches reported). • Interviews with staff show awareness of procedure
BS 5.6. Provide training and information to girls', boys' children and young people in all their diversity on how to stay safe online, particularly where they are involved in Plan projects which engage interacting with social media. Ensure that the training/advice/ information includes specific risks associated with online 'friends', sharing very personal information publicly, speaking out on issues, time spent online, social media addiction and where to report concerns or get help.	• Evidence of specific training/briefing/ communication material which is child and youth friendly
BS 5.7. Ensure that any social networking site for children and young people hosted by Plan clearly identifies Plan as the owner, allows communication between child/youth participants to be moderated, vetted and monitored and does not allow contact between adults and child/youth participants[57], has a clear link to the safeguarding policy and safeguarding code of conduct and reporting process (which may be adapted for the purpose of the site).	• Review of Plan hosted social media sites should show attainment of this indicator.

56 These policies are fully applicable to Plan International, Inc, branch offices and subsidiaries. National Offices are expected to use them as a guideline
57 Staff will have to be involved in the project. However, any communication between staff and children should be vetted/supervised/monitored, and be governed by documented procedures for the project which should ensure full adherence to the principles underpinning the Safeguarding Policy.

ATTAINMENT INDICATORS	SUGGESTED MEANS OF VERIFICATION
BS 5.8. Ground rules are established when working with groups of children and young people online. These are established and agreed with the children and/or young people and address the implications of online misconduct (including, cyber bullying, online grooming and exploitation, uploading of inappropriate content) and also ensure the protection of individual children's privacy	• Review how the ground rules were established and that they are appropriate to the user's ages, profile and understanding. • Review that established rules are in line with safeguarding principles
BS 5.9. Risk assessments of, and management strategies for, IT uses, Plan social media sites and projects include documented consideration, management and review of safeguarding risks	• Documented risk assessments are available including how identified risks will be managed. Documented monitoring and follow up on actions identified to address risks.

RESOURCES WHICH AID THE IMPLEMENTATION OF THIS STANDARD

- Online Safety Procedures for Children - the 'eleven rules' for children to follow to ensure they stay safe online [available in English only]
- 'Working Together with Children for Safety in the Virtual World ' by Plan Australia [English]
- Child Protection and Social Media by the Keeping Children Safe Coalition [English]

Good websites for 'Online Child Protection' resources and materials :

- International Telecommunications Union http://www.itu.int/osg/csd/cybersecurity/gca/cop/;
- The UK's Child Exploitation and Online Protection Centre http://ceop.police.uk/

Documents owned and produced by Plan GH's IT Department

- Information Security Policy [English]
- Information Classification Policy [English]
- Access Control Policy [English]
- Global ICT Policy for Users Policy [English, French, Spanish]

Documents owned and produced by Plan GH's Legal Department

- Retention, Storage and Destruction of Key Documents Policy [English]– document owned by Legal and guidelines [English]
- Data Protection Policy and Guidelines

APPENDICES

APPENDIX 1 – POWER AND PATTERNS OF VIOLENCE IN SOCIETIES AND ORGANISATIONS

In all societies there are groups or individuals who have the most power, social status and access to resources and work to maintain the social or 'cultural' norms that favour them. How this impacts on the way in which we design and deliver our work with communities is described in more detail in the Safe Programming and Influencing Work guidelines.

Within the organisation, we need to recognise that despite our own best intentions, we are all from societies where certain groups or individuals have the most power. We will have formed our own biases, whether conscious or unconscious[58]. These impact on how we view race, gender, sexual orientation, body size, religion, accent, height, even hand dominance, and more. We make assumptions about people and situations based on our own identity, background, personal experience and outlook on life. We are exposed to, and surrounded by, ideas systems and structures that influence how we think and understand the world; these can often support stereotypes and inequality. Regarding gender, for example, we may take men more seriously than women, or we may think men's priorities and concerns are more important than women's. There is also what is known as the "halo effect", a type of bias where our overall impression of a person influences how we feel and think about his or her character. We may, for example, be more likely to listen to women or girls or a child when they are conforming to what we think 'good' women/girls/children should be – and less likely to listen to those we consider 'difficult'.

The assumptions we make can be largely unconscious, but may have a significant negative impact when it comes to how we engage with our peers and those with whom we work. Our biases can influence how we see the risks faced by individuals with different identities from our own. Our own assumptions, for example, about what is 'appropriate' for girls or boys may limit our capacity to think about what equality might look like. We may assume we know about the expectations or social norms in communities for girls and boys. We may agree with those social norms; or we may not know how to challenge that thinking in a way that is meaningful and does not expose girls, boys, children and young people to harm. We may be more likely to listen to certain groups and give them more weight in our decision-making; we may for example listen to the perspectives of adults – and particularly men - more than those of children and young people (and particularly a girl child/young person).

SOME POTENTIALLY 'DANGEROUS' BELIEFS

- **Some forms of disability are a sign of witchcraft at work.**
- **A child who challenges an adult could be under a spell.**
- **Homosexuals are not normal people.**
- **Refugees have no right to complain if they are mistreated. They should be grateful for any kind of assistance given to them.**
- **A girl who wears revealing clothes is asking to be raped.**
- **Men can be cured from HIV by having sex with a virgin.**
- **Real men have multiple sexual partners.**

Organisations often reflect the power and structural inequalities that can be seen in society because 'we' – i.e. staff and associates – come from and are part of society. The norms and group dynamics that exist in society therefore also exist in an organisation. Structures and systems reinforce these and shape the ways in which power and dominance operate in organisations. Certain positions may be dominated by men, while women may be more concentrated

58 See https://www.fastcompany.com/3037359/how-unconscious-bias-affects-everything-you-do

in what are considered to be 'softer' or more 'people focused' areas of an organisation, such as human resources. An organisation's culture may be more 'masculine' in nature e.g. it has adopted a management style and approach which is 'command and control' rather than 'democratic' or 'participative'.

An organisation's structure and culture has a significant impact on how the organisation safeguards its own people, as well as the children and communities with whom it works. The ways in which these dynamics work can be extremely subtle, including factors such as whose knowledge is more valued, who is included in meetings and information-flow and who is not, who has the 'last word' in decision-making and so on. These dynamics are often shaped along the lines of intersecting identities. People with a shared identity, for example, may bond despite being unequal in other ways – for example white international male staff may bond more readily with national male staff (who are otherwise unequal through e.g. race or position within the organisation). Sharing discriminatory attitudes to women and using 'banter' and 'joking' can allow men to reinforce that bond of gender and their dominant position. In addition such attitudes tend to favour lenience ,deflecting behaviour toward sexual exploitation, abuse and harassment,

Women staff, for example, whilst they have the privileges of being employed as professionals, are more often exposed to harassment and abuse both within their organisations and within communities, than their male counterparts. There is also a need to recognise that we do not necessarily always align with or support our own identity – for example, women will not necessarily have a woman-centred perspective and may not necessarily advocate on behalf of females (adult or child). For some women, surviving and succeeding in male-dominated organisations means taking on those values and behaving in ways that meet the approval of the organisation.

Understanding the influence and impact of power, how this is maintained through social and other norms, and the patterns of violence against different groups of people, children and young people is vital to understanding what we need to do to create create an enabling environment for safeguarding. This will help us to foster equality and inclusion in our workplaces, as well as in understanding whether our work is likely to improve the situation for different groups of girls and boys or exacerbate existing norms and patterns of violence.

QUESTIONS TO PROMPT REFLECTION ON ORGANISATIONAL POWER

- **How diverse is the organisation's staffing?**
- **Who holds the explicit power within the organisation (leadership positions), from which 'community' or 'group' are they largely drawn from (women, persons with disability, communities the organisation supports e.g. refugees) and what is the impact of intersectionality? Do men with disabilities have more access to power and decision-making than women, for example?**
- **Who holds implicit power within the organisation (staff without the traditional formal power but who nonetheless have a considerable influence)? What impact does gender and other identities have on this?**
- **Where is decision-making largely based within the organisation? Close to the children and communities affected by the decisions, or nearer to those who fund the decisions?**
- **In relationships and decision-making between the organisation and communities, who is involved in this? Which community members have the strongest voice and the strongest relationships? What are the opportunities for women's groups, children and young people (and particularly girls and other marginalised groups) to shape those relationships and decision-making?**

APPENDIX 2 - PLAN'S SAFEGUARDING CHILDREN AND YOUNG PEOPLE POLICY AND SAFEGUARDING CODE OF CONDUCT

GLOBAL POLICY SAFEGUARDING CHILDREN AND YOUNG PEOPLE. SAY YES! TO KEEPING CHILDREN AND YOUNG PEOPLE SAFE AND PROTECTED

APPLICATION

As a Global Policy, this policy applies to:

(a) Plan International, Inc. ("PII"), including its headquarters in the United Kingdom (operating through its UK subsidiary, Plan Limited), and all of its country offices, regional offices, liaison offices, and any other offices, some of which operate as branches and some as subsidiaries;

(b) All National Organisations that have signed a Members' Agreement and License Agreement with PII; and

(c) All other entities that agree to be bound by the Global Policies.
(together, "Plan International Entities", or may be referred to as "we" or "us" in this document).
All of the Plan International Entities, including PII, shall enact their own procedures which must be in line with global procedures, regulations, or other regulatory documents that enable compliance by its employees (and/or, when appropriate, contractors and other partners) with this Global Policy. Where required by law or local practices, PII offices and National Organisations may enhance the standards and requirements set out in this policy.

Girls
Due to our Purpose, this Global Policy, has a particular focus on girls and young women aged up to and including 24 years. Girls may be especially vulnerable and at risk from certain forms of violence, including sexual and gender-based violence[59].

Violence against girls is not only against the values and principles we uphold as described in this Global Policy, but also in direct opposition to the aims of our work. As such, we are particularly concerned with ensuring that girls do not experience harm, abuse, exploitation, or any other form of violence as a result of their engagement with us or our programmes, projects, events, and processes. Furthermore, we need to ensure that our safeguarding approach and response to safeguarding concerns are gender responsive.

Young People
We work with Young People, and therefore the protective scope of this Global policy extends to young people we are supporting or are in contact with, through our youth engagement work. We recognise that young people have particular safeguarding needs requiring distinct consideration. For example, some young people engaging with and attending events supported by a Plan International Entity may be over the formal age of majority and so face fewer legal restrictions in what is permissible, but still require protection from violence and we retain a duty of care towards them.

PURPOSE

Plan International recognises that violence against children and young people is prevalent throughout the world and in all societies. Violence against children includes physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment and sexual abuse. Furthermore, children and young people may be vulnerable and at risk due to, for example, reasons of gender, sexual orientation, ethnic origin, disability and age or illness.

Plan International is fully committed to ending violence against children and acknowledge that we have a duty to promote the gender responsive safeguarding of children and young people and particularly those with whom we work or are in contact.

The purpose of this policy is to ensure that:

- all who work for and engage with us are skilled, confident, understand, and are well supported in meeting their responsibilities to safeguard children and young people from violence and engage positively with them in ways that enhance the achievement of our Purpose;
- we have in place procedures to prevent and deal with the actions/behaviour of our Staff, Associates, Visitors or us as an organisation that result in violence against a child or young person and/or places them at risk of the same; and
- children and young people we work with are aware our responsibilities to prevent and respond to any harm against them arising from actions and behaviours of our Staff, Associates and Visitors, and, the routes for reporting such incidents.

POLICY STATEMENT

- **We are fully committed to the gender responsive safeguarding of all children and young people from all forms of violence. We take very seriously our responsibility and duty to ensure that we, as an organisation, and anyone who represents us does not in any way harm, abuse or commit any other act of violence against children and young people or place them at risk of the same.**
- **We promote child and youth safe practices, approaches, interventions and environments which respects, recognises and responds to the specific safeguarding needs and addresses the protection risks of the differing gender and other identities. We will challenge and do not tolerate inequality, discrimination or exclusion.**
- **We respond to a child or young person who may be in need of protection and or psycho-social support and intend that their welfare and best interests will at all times be paramount consideration.**
- **We ensure all who work with and engage with us understand and are supported in their meeting safeguarding roles and responsibilities. We take positive action to prevent anyone who might be a risk to children and young people from becoming involved with us and take stringent measures against any Staff, Associate or Visitor who perpetrates an act of violence against a child.**
- **We promote the active involvement of children and young people in their own protection.**

APPLICABLE REQUIREMENTS

This Global Policy is underpinned by the following set of principles that guides its implementation:

1 All children and young people aged under 18 years have equal rights to protection from all forms of violence as declared in Article 19 of the United Nations Convention on the Rights of the Child. In addition, the Universal Declaration of Human Rights recognises fundamental human rights, the dignity, worth and equal rights of people at any age, thus including young people aged 18 to 24 years old.

2 The human rights of children and young people will be respected and applied to all irrespective of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, any history of conflict with the law or any other aspect of their background or identity. Inequality, exclusion, and discrimination will be challenged and will not be tolerated.

3 All children and young people should be empowered and encouraged to fulfil their potential. Decisions made about children and young people will be made as far as possible with their participation and in their best interest giving full consideration to how such decisions will affect them. Children will be encouraged to express their views this will be given 'due weight' in accordance with their age and lev el of maturity.

4 We have a responsibility to care for and protect children and young people, especially those that are vulnerable, and make sure they are not harmed.

5 We have particular responsibilities to children and young people with whom we come into contact. No child or young person must suffer harm, intentionally or unintentionally, as a result of their engagement, association or contact with us whether as a sponsored child, a participant in our programmes, projects, events, processes, or youth advisory panels or as part of a fundraising or influencing campaign.

6 We have a responsibility to inform and empower children and young people so that they learn about and are better able to exercise their rights to protection. We will work with children and young people ensuring they understand the essence of this policy, our safeguarding commitment and the means via which they can report policy breaches. We will also involve them in the development of safeguarding measures within Plan International in accordance with their evolving capacities.

7 We are open and transparent, and will hold ourselves to account for our commitment to safeguard children and young people. Safeguarding concerns can be raised and discussed, poor practice and inappropriate behaviour challenged and addressed, and our safeguarding measures continuously reviewed and strengthened to ensure we remain accountable to children, young people, and their families.

8 We will act on on safeguarding concerns, ensuring that our actions are timely, appropriate and centered around the child or young person, taking into account their gender and other specific safeguarding needs and vulnerabilities.

9 We work together in partnership with other agencies to promote the safeguarding of children and young people within organisations engaged with us and in the wider community.

59 Boys are also vulnerable to sexual abuse and exploitation but the overwhelming majority of reported incidents identify girls as the victims.

10 We will never knowingly allow a person to become or continue to be, a sponsor where the person:
(a) is currently in prison for any type of crime including awaiting trial; or
(b) has committed crimes against children

11 Our safeguarding approach recognises and responds to the specific safeguarding risks and needs of the differing gender and other identities. It takes appropriate measures to address gender bias and other forms of discrimination and violence which may arise as a result of these. It supports the empowerment and fosters the inclusion of girls in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection.

12 Our safeguarding approach is mainstreamed in all stages of our operations, thematic portfolios, programmes, projects, activities, influencing work, and interventions in both development and humanitarian settings thus ensuring that these are designed and delivered in a manner that does no harm to children and young people.

In light of our commitment and accompanying principles, we give the highest priority to the safety and protection of children and young people.

We will ensure our Staff, Associates, and Visitors are supported to meet their safeguarding responsibilities and requirements, understand the specific risks to children and young people of differing gender and other identities and how they can work and engage in ways that increase the safety and protection of children and young people with whom we are in contact.

Our Safeguarding Implementation standards lays down the requirements for ensuring safeguarding measures are embedded in all parts of our operations and interventions.

Sanctions
Breaches of this policy will be investigated in accordance with disciplinary procedures and contractual agreements, or a referral may be made to statutory authorities for criminal investigation under the law of the country in which they work. Breaches may incur sanctions including disciplinary action leading to possible dismissal, termination of all relations including contractual and partnership agreements, and where relevant, appropriate legal or other such actions.

If a legitimate concern about the suspected abuse of a child or young person is raised but proves to be unfounded on investigation, no action will be taken against the reporter. However, appropriate sanctions will be applied in cases of false and malicious accusations.

ROLES AND RESPONSIBILITIES

1. All Staff, Associates and Visitors shall:
a. commit and contribute to an environment where children and young people feel respected, supported, safe and protected
b. never act or behave in a manner that results in violence against a child or young person or places a child or young person at risk of violence;
c. be aware of and adhere to the provisions of this Global Policy.

2. All Staff shall:
a. comply with this Global Policy, including the Safeguarding Code of Conduct (Annex 1); and
b. report and respond to safeguarding concerns and breaches of the policy in line with the applicable procedures of the applicable Plan International Entity.

3. Associates and Visitors shall:
a. agree, by signing, to complying with either:

i: the Safeguarding Code of Conduct (Annex 1); or

ii: other appropriate guidance developed by a Manager at the relevant Plan International Entity on appropriate behaviour towards children and young people as relevant to their engagement using the Safeguarding Code of Conduct (Annex 1) as a guide; or

b. comply with his/her own Code of Conduct, provided the contracting Manager ensures that it complies and is consistent with this Global Policy.

4. Managers shall ensure that:
a. Children, young people and communities with which we engage, work or are in contact are made aware of the provisions of this Global Policy to ensure they have the confidence and ability to report any incidents occurring against children and young people;

b. Staff, Associates, and Visitors are aware of the Safeguarding Implementation Standards that are applicable to their role or engagement with us;
c. they support and develop systems which maintains an environment which is safe for and prevents violence against children and young people; and

d. they are accountable for ensuring that the policy is fully embedded within their areas of responsibility in accordance with the Safeguarding Implementation Standards (Annex 2).

5. **Directors shall ensure that:**
   a. the relevant Plan International Entity has in place local procedures that are consistent with this Global Policy and with the global document *Reporting and Responding to Safeguarding Issues* which outlines the reporting requirements and the manner in which they are escalated within each Plan International Entity. These local procedures should be developed with the assistance of local advisers and updated regularly. The policy and applicable procedures must be made available in local languages and child-friendly formats; and

   b. the relevant Plan International Entity implements our Safeguarding Implementation Standards as they apply to their context, the people (Staff, Associates, and Visitors), children and young people with whom they engage, as well as the processes, programmes, projects, events and activities they undertake.

6. **Organisations that work with us** in carrying out our programmes, projects, processes, events and/or activities involving children and young people must comply with the Safeguarding Guidelines contained in Annex 2.

7. **All Plan International Entities** shall monitor compliance with this Global Policy through the mandatory tracking and auditing of the Safeguarding Implementation Standards and Safeguarding Code of Conduct (see Annex 1). Auditing against the standards will be led by PII's Global Assurance Department. In addition, we will work with and ensure the participation of children, young people, staff, associates and visitors to review, monitor and evaluate the implementation of this Global policy.

TERMS AND DEFINITIONS

When used in this document:

"Associate" refers to a range of contracted paid and non-paid individuals who have committed to work with or support a Plan International Entity. It includes, among others, board members, volunteers (including community volunteers), interns, sponsors, researchers, donors, consultants and contractors, staff and/or representatives of partner organisations and local governments (when operating in partnership agreement with a Plan International Entity).

"Child" in line with the United Nations Convention on the Rights of the Child and for the purposes of this Global policy, is defined as any person – girl, boy, young woman, young man, and children of other gender identities - under the age of 18 years (UNCRC Article 1). (See definition of Young Person/ People or Youth below).

"***Director***" is an Executive Director of PII or a National Director.

"Direct beneficiaries" are the people who are the target of and who we know will be immediately affected by one or more project outputs; irrespective of whether these are delivered directly by Plan International or by partners or organisations who are acting on behalf of Plan International.

- Direct beneficiaries are individuals who receive materials, equipment; interventions such as training, awareness raising, mentoring or other personal support.

- Direct beneficiaries may be a single member of a household (for example a mother participating in training on nutrition); or it may be all members in the household (for example, distribution of hygiene kits or malaria nets that the whole family use).

"***Harm"*** is any detrimental effect on a child's or young person's physical, psychological, or emotional wellbeing. Harm may be caused by abuse or exploitation whether intended or unintended.

"Manager" refers to a Staff member who has responsibility for line managing or supervising the work of Staff or Associates.

"National Organisation" or "NO" refers to a legal entity that has signed a Members' Agreement and License Agreement with PII.

"PII" refers to Plan International, Inc., including when operating through one of its subsidiaries. It generally includes international headquarters, regional offices, liaison offices, and country offices.

"'Safeguarding children and young people' is the responsibilities, preventative, responsive and referral measures that we undertake to protect children and young people, ensuring that no child or young person is subject to any form of harm as a result of their association with the organisation. This includes, ensuring that their contact with us and those associated with us and/or their participation in our activities, interventions and operations is safe and where there are concerns over a child or young person's welfare or where a child or young person has been subject to violence, appropriate and timely actions are taken to address this and incidents are analysed so as to ensure continued learning for Plan International Entities.

"***Safeguarding - Gender Responsive Safeguarding"***[60] is a safeguarding approach that:

- takes full account of gender in considering the specific safeguarding needs of girls, boys and other gender identities;
- integrates safeguarding measures that address protection risks for children and young people (girls, boys, young women, young men, and children of other gender identities) that stem from issues relating to gender bias and discrimination; and
- supports the empowerment and fosters the inclusion of girls, particularly in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection

"'Staff" refers to individuals who receive a regular salary for work in any Plan International Entity as well as individuals paid by or through a Plan International Entity but located in another entity.

"Violence" against a child or young person[61] includes all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, emotional ill-treatment or psychological violence, sexual abuse and exploitation, harassment, and commercial or other exploitation of a child or young person. Acts of violence can also take place online through, for example, the web, social media or mobile phones. It may be an intentional act involving the use of physical force or power or it may be failing to act to prevent violence against a child or young person. Violence consists of anything which individuals, groups, institutions or organisations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to the child or young person's wellbeing, dignity and survival and development.

"Visitor" refers to a range of persons who are visiting our offices or programmes and may come into contact with children and young people through a Plan International Entity, including journalists, media, researchers, visiting sponsors and celebrities.

"Young Person/People" or "Youth" in line with United Nations definitions, include individuals – young women, young men, and young persons of other gender identities - aged 15 years to 24 years old. This group spans the categories of 'children', 'adolescents' and 'adults' but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

60 A working definition developed by PII Child and Youth Safeguarding Unit which may change on completion of our Gender Responsive Safeguarding toolkit.
61 A working definition. Awaiting final definition from International Programmes.

SAFEGUARDING POLICY ANNEX 1: CODE OF CONDUCT

Plan International is committed to creating a safe environment for children and young people. All staff have a duty to uphold the principles of the Global Policy on Safeguarding Children and Young People and commit to maintaining an environment that prevents violence against children and young people. Further to this, sexual exploitation and abuse by staff (including those that work in our humanitarian response) constitutes acts of gross misconduct and is therefore grounds for termination of employment.

As such, I agree that I will:

a. Adhere to the Global Policy on Safeguarding Children and Young People and be open and honest in my dealings with children and young people, their families, and communities participating in programmes, projects, processes, events, and activities.

b. Treat children and young people in a manner which is respectful of their rights, integrity, and dignity and considers their best interests regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, or any history of conflict with the law.

c. Create and maintain an environment which prevents the abuse and exploitation of children and young people ensuring that I am aware of potential risks with regards to my conduct and work, and take appropriate action so as to minimise risks to children and young people.

d. Contribute to building an environment where children and young people we engage with are:

- respected and empowered to participate in and discuss decision making and interventions into their safeguarding in accordance with their age, maturity and evolving capacities; and
- well informed on their safeguarding and protection rights and what to do if they have a concern.

e. Display high standards of professional behaviour at all times, providing a positive role model for children and young people.

f. Comply with all relevant international standards and local legislation in relation to child labour, and refrain from using children and young people aged below 18 years for domestic or other labour, if such work is inappropriate, exploitative or harmful given their age or developmental capacity, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury, exploitation, or violence. In addition, I understand that I must not use children and young people of any age that we work with for domestic or other labour.

g. Respect the privacy and confidentiality of children and young people associated with Plan International. This means I will:

- Never ask for or accept personal contact details or invitations to share personal contact details (this includes email, phone numbers, social media contacts, address, webcam, skype, etc.) from any child or family associated or formerly associated[62] with our work or share my own personal contact details with such individuals except where this has been explicitly authorised by Plan International and/or for Plan International business purpose.[63]
- Never disclose, or support the disclosure of, information that identifies sponsored families or children, through any medium, unless that disclosure is in accordance with standard Plan International policies and procedures and/or has the explicit consent of Plan International[64.] Media include paper, photographs, and social media
- Never make any contact with a child, young person, or family members associated with Plan International's work that is not supervised by a (or another) member of Plan International Staff. Such contact may include but is not limited to visits and any form of communication via social media, emails, and letters.
- Always ensure that when on an official or work visit with Plan International and I wish to take pictures of children and young people associated with the organisation, for personal use, I will:
  - Always consult first with the local Plan International office so as to make sure that it is ok to take pictures in the local context and that the intended use of the pictures does not conflict with Plan International's policies.

62 Where the child is a sponsored child requests for continued communication upon 'graduation' of the sponsorship (when the sponsored child reaches 18 years) must comply with Plan International's Sponsorship guidelines on the same.
63 Plan International will seek informed consent as appropriate from the child or young person.
64 Plan International will seek informed consent as appropriate from the child or young person.

- Ask permission of the child or young person (or in the case of young children, their parent or guardian) informing them of the specific purpose(s) and intended use (including how and where) and respect their decision to say no making it clear that there will be absolutely no negative repercussions from denying such consent.

- Ensure the images are respectful and do not impact negatively on their dignity and privacy.

- Ensure that the use of the images does not put the child or young person at risk of being identified or located.

- Never upload the images of children and young people associated with Plan International to non-Plan International social media pages without the full and explicit consent of Plan International[65].

h. Report and respond to any concerns, suspicions, incidents or allegations of actual or potential abuse to a child or young person in accordance with applicable procedures of the engaging office.

i. Cooperate fully and confidentially in any Plan International investigation of concerns or allegations of abuse to children and young people.

j. Immediately disclose all charges, convictions, and other outcomes of an offence, which occurred before or occurs during association with Plan International that relate to exploitation and abuse of a child or young person.

I will not:

a. Abuse or exploit a child or young person or behave in any way that places a child or young person at risk of harm, including through harmful traditional practices such as, for example, Female Genital Mutilation, forced or child marriage.

b. Engage in any form of sexual activity or develop physical/sexual relationships with anyone under the age of 18 regardless of the age of consent locally. Mistaken belief in the age of a child is not a defence.[66]

c. Engage in sexual relationships with Plan International youth direct beneficiaries aged 18 to 24 years as these undermine the credibility and integrity of Plan International's work and are based on inherently unequal power dynamics'.[67]

d. Use physical punishment/discipline or use of physical force of any kind towards children and young people.

e. Engage young people in any form of sexual activity which involves the exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of assistance that is due to beneficiaries[68]

f. Use language or behave towards a child or young person in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate.

g. Fondle, hold, kiss, hug or touch children or young people in an inappropriate or culturally insensitive way.

h. Have a child/children/young person with whom I am in contact in a work related context, stay overnight at my home or any other personal residential location or accommodation.

i. Sleep in the same room or bed as a child or young person with whom I am in contact in a work related context. Where it is necessary to sleep close to unaccompanied children and young people, I will make sure that another adult is present and it is in line with authorised procedures.

j. Do things of a personal nature for children or young person, with whom I am in contact in a work related context, (e.g. taking a child/young person to the toilet/bathroom; helping them get un/dressed etc.) that they can do for themselves.

k. Spend time alone away from others with children and young people with whom I am in contact in a work related context; I will always make sure that another adult is with me and/or I am with the child/young person in an open public place, where others are around and in plain view of others.

l. Hit or otherwise physically assault or physically abuse children or young people.

m. Act in ways that shame, humiliate, belittle or degrade children and young people, or otherwise perpetrate any form of emotional abuse.

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65 Plan International will seek informed consent as appropriate from the child or young person and parents or guardians where applicable.
66 ST/SGB/2003/13: UN Secretary-General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse, 2003 (endorsed by Plan International).
67 We recognise that our incentive Workers and Community Volunteers live in communities where we operate and so on rare occasions, relationships may develop that may be seen as acceptable in the community but would breach this element of the code. However, we expect Incentive Workers and Community Volunteers working in Programme areas to make known to the relevant manager any potentially compromising relationship they are in or considering, that involve a beneficiary who is aged 18 years and above.
68 ST/SGB/2003/13: UN Secretary-General's Bulletin on Special measures for protection from sexual exploitation and sexual abuse, 2003 (endorsed by Plan International).

n. Discriminate against, show differential or preferential to, or favour particular children and young people to the detriment of them or others.

o. Develop relationships with, engage in any practice with or develop behaviour towards children and young people which could in any way be deemed or interpreted as exploitive or abusive.

p. Condone or participate in behaviour of children or young people which is illegal, unsafe, or abusive.

q. Use any computers, mobile phones, video and digital cameras, or any such medium to exploit, harass or bully children or young people.

r. Use computers, mobile phones, or video/digital cameras or other electronic devices, to access, view, create, download, or distribute pornography, especially abusive images of children or young people.

The above is not an exhaustive list. Staff, Associates, and Visitors should consider all related actions and behaviour which may compromise the rights and safeguarding of children and young people.

Personal Conduct outside Work or Engagement with Us

We do not dictate the belief and value systems by which Staff, Associates, and Visitors conduct their personal lives. However, actions taken by them out of working hours that are seen to contradict this policy will be considered a violation of the policy.

Our Staff, Managers, Associates, and Visitors are required to adhere to principles of the Global Policy on Safeguarding Children and Young People both at work and outside work.

SAFEGUARDING POLICY ANNEX 2: GUIDELINES FOR IMPLEMENTING SAFEGUARDING IN PRACTICE

These guidelines outline the requirements for safeguarding children and young people that are applicable to organisations that work with Plan International Entities in carrying out our programmes involving children and young people.

They are particularly applicable to organisations assessed as having contact with children and young people, working with children and young people, and/or whose projects, programmes, processes, activities, advocacy and influence work impact on children and young people. Organisations funded by a Plan International Entity are expected to build on these guidelines as appropriate based on the nature of their activities and risks to children and young people.

The guidelines illustrate our commitment to support and respect children's and young people's rights to be protected from harm, and to provide a safe and protective environment for children and young people who are involved with any programmes funded by a Plan International Entity.

The guidelines should be applied in relation to children and/or young people as appropriate, depending on *the group the organisation works with.*

1 **Prevention:** The Organisation must take appropriate measures to manage child and/or youth safeguarding risk factors and prevent abuse and exploitation before it occurs. Prevention measures should include organisational safeguarding policies, codes of conduct and associated procedures; the management of safeguarding risks in relation to its operations, activities and interventions; and the production and promotion of 'child and young person friendly' safeguarding information and resources.

2 **Code of Conduct:** Each Organisation is required to ensure that their personnel avoid any behaviour or conduct that compromises the safety and protection of children and/or young people within its activities, operations and programmes. In addition, programmes and activities working directly with children and/or young people or involving direct contact between the same should develop guidance on expected and acceptable behaviour for children and/or young people towards each other. This should be incorporated into policy and practice documents.

3 **Gender Equality and Non-Discrimination:** The Organisation should ensure that all Safeguarding Children and/or Young People policies and procedures take into account gender equality and non-discrimination requirements. Recognising that girls, boys, young women, young men, and children and young people of different gender identities may face different risks relating to their safety and protection and that all children and/or young people have an equal right to protection, irrespective of: age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, or class.

4 **Screening Procedures:** There should be detailed screening procedures for all personnel (including unpaid volunteers) who will come into contact with children and/or young people (directly or indirectly). Screening procedures should be as available in each country and updated on a regular basis, where possible. Screening procedures may include: certificate of good conduct, police reference checks or equivalent, verification that applicants are not listed in national registries of child offenders; a detailed application and interview process; references who support the applicant's suitability to work with children and/or young people.

5 **Awareness:** The Organisation should ensure that all personnel, sub-contractors or consultants or affiliates involved with children and young people's programmes are aware of safeguarding risks, policies and procedures; and their safeguarding responsibilities. In addition children and/or young people engaged and their parents, guardians or carers should be informed of the same so that they know what behaviours to expect and how to report any concerns.

6 **Capacity Building:** The Organisation should develop the capacity of all who work with and for children and/or young people to appropriately prevent, detect, report and respond to safeguarding concerns and particularly as they pertain to differing gender and other identities. Efforts should be made to ensure organisational policies and practices are understood and can be effectively implemented through mandatory inductions and on-going training courses for all employees and volunteers and other associates.

7 **Participation of children and/or young people:** Children and/or young people should be actively, meaningfully and ethically involved in the development of safeguarding measures in accordance with their evolving capacities. Children and/or young people must not be treated simply as objects of concern but rather listened to and taken seriously and treated as individual people with their own views.

8 **Reporting Mechanisms for children and/or young people and Staff:** Mechanisms should be established that enable the safe reporting of safeguarding concerns. Such mechanisms should ensure appropriate escalation of concerns within the organisation, referral to the appropriate authorities and confidentiality. In addition child and youth reporting mechanisms should be accessible, friendly and sensitive to their differing needs

9 **Response and Follow Up:** Organisational policies and procedures should include appropriate measures to support and protect children and/or young people when concerns arise. All measures taken to respond to a safeguarding concern should take into account the best interest of the child or young person and be sensitive to their differing gender and other identities ensuring they are kept safe and protected. Response measures should be appropriately risk assessed and endeavour to ensure no further harm comes to the child and/or young person as a result of any actions taken by the Organisation.

Concerns should be written up and information kept in accordance with the privacy and confidentiality policies of the Organisation and/or local legislation. In addition, organisational processes should ensure response evaluation and follow up for organisational learning.

The Organisation should also advise Plan International of any complaints of abuse to children and/or young people in line with the working agreement.

10 **Implementation, Monitoring and Review:** The implementation and monitoring the Safeguarding Children and/Young People Policy for each Organisation should be reviewed at regular intervals as determined necessary by the Organisation, preferably at least every three (3) years, where possible.

11 **Sanction and Discipline of Organisation personnel:** The Organisation policies and procedures should provide for appropriate sanctions and disciplinary measures which ensures children and young people are protected from further potential harm. This may include the immediate suspension of personnel until such time as the allegations are followed up and either substantiated or refuted and/or where personnel is convicted of abusing a child or young person, the said personnel is immediately terminated with cause from his or her position.

12 **Informed Consent:** The Organisation should provide children and/or young people (and their parent(s)/legal guardian(s) where applicable), with all necessary details (including on any associated risk,) to make an informed decision regarding their participation in programmes and activities, including any voice recordings, video or photographs of children and/or young people (including how and where these will be used). Participation and/or usage of information and/or images should only take place after consent is obtained.

13 **Protection of Personal Information:** Personal information regarding any Child or children and/or young people, whether or not such information is obtained as part of the programmes involving children and/or young people, should be treated confidentially. There should be clear procedures showing the responsibilities within the organisation for accessing and using such data with appropriate authorisations. In addition such data should not be disclosed to any third party, except in accordance with the policies of the Organisation or as required by applicable local laws. Personal information includes, but is not limited to, any information that can be linked to or used to identify a Child and/or Young Person.

14 **Working with partners:** The Organisation should ensure adequate safeguarding assessments are made as part of its due diligence processes when it comes to partnership working. Third party entities that are contracted or supported to work with children must be subject to the same safeguarding principles and approach outlined in the Organisations policy and procedures. Vendors, suppliers and other contractors that may be in direct or indirect contact with children must also be subject to appropriate safeguarding measures.

APPENDIX 3 - FREQUENTLY ASKED QUESTIONS (FAQ) TO THE POLICY

This document aims to provide answers to some of the commonly asked questions and comments made on the Global Policy on Safeguarding Children and Young People (also referred to as the Safeguarding Policy) - *issued November 2017 and replacing the Child Protection Policy.* It does **not** replace the requirement for Plan International offices to have in place, distribute and communicate their local Safeguarding Policy procedures, **nor** does it remove from staff and associates their responsibility to refer to such procedures.

If you have any questions not answered by this document or require any additional information on the policy or terms used within this document, or on reporting and responding to concerns, please speak to your local Plan International Office Director, your local Safeguarding Children and Young People Focal Point. You may also direct your queries directly to Plan International's Safeguarding Children and Young People Unit at International Headquarters.

FAQ: Scope of the policy

1. Why does the protective scope of the policy extend to include young people aged 18 to 24 who we support or are in contact with, through our youth engagement work'? They are effectively adults with their own rights and thus responsible for themselves.

2. Why does the Safeguarding Children and Young People Policy apply to Plan International, Inc. and its Member National Organisations? The National Organisations are autonomous and can set their own standards.

FAQ: Concepts, terminology

3. The 2017 version of the policy use the term safeguarding instead of protection. Why is this and how does child safeguarding differ from child protection programming?

4. In my country the translation of the term 'safeguarding' means something other than what the organisation intends it to mean. What can we do?

FAQ: Reporting

5. The policy requires me to report any safeguarding concerns and breaches of the policy in accordance with applicable local office procedures. Am I expected to report all such concerns that I have?

FAQ: Safeguarding Code of Conduct

6. Why am I prohibited from disclosing information that identifies sponsored families or children or from using images of children or young person in a manner that puts them at risk of being identified or located (that is unless disclosure/use is in accordance our established procedures)?

7. Why does Plan International prohibit unsupervised contact with children, young people or family members associated with Plan International's work?

8. Some of the codes of behaviour listed in the Safeguarding Code of Conduct are not illegal. How can the organisation hope to enforce this?

9. Questions on Plan International's prohibition of 'physical/sexual relationships with anyone under the age of 18 years regardless of the age of consent locally.

10. Questions on Plan International's prohibition of sexual relationships between staff and young people direct beneficiaries aged 18 to 24 years.

11. What about local/commonplace/traditional practices that conflict with the policy?

12. Why am I expected to adhere to the principles of the Safeguarding Children and Young People Policy outside of work or in my personal life?

13. As I am expected to uphold the principles of the Safeguarding Children and Young People Policy outside work or in my personal life will offices be policing the personal lives of staff?

FAQ: guidelines for implementing safeguarding in practice

14. Why have we included guidelines for implementing safeguarding in practice as an annexe to the Policy?

FAQ: SCOPE OF THE POLICY

1. Why does the protective scope of the policy extend to include young people aged 18 to 24 who we support or are in contact with, through our youth engagement work'? They are effectively adults with their own rights and thus responsible for themselves.

In line with United Nations definitions, Plan International uses the terms "Young Person/People" or "Youth" to refer to individuals aged 15 years to 24 years old.

For young people and children aged below 18 years, the Safeguarding Children and Young People Policy has always applied. However, we work with young people aged 18 to 24 years and so the protective scope of the policy now extends to **young people we are supporting** through our programme and other such interventions **or are in contact with, through our youth engagement work for example. [Note** that the references throughout the policy and its appendices to 'young people' strictly refer to this category of young people.]

We recognise and know that know that young people who are young adults have particular safeguarding needs that are different from the needs for younger children and older adults. For example, transitioning into independent living and employment for the first time can place young people at risk.

However, although a young person may move to adulthood at the age of 18 years, that does not mean they cannot be vulnerable or at risk of harm. Where we are working with the young person we do not stop being concerned for their safety and protection nor do we relinquish our duty towards them. We have particular responsibilities to the young people whom we work with and this is clearly explained in the policy.

Furthermore, the Safeguarding Children and Young People Policy does **not** affect the rights of young people aged 18 years and over, nor of children for that matter. Their rights remain intact. Rather the policy governs **our** behaviour and places responsibilities on **us** as staff and associates of PII. It is about ensuring that our Staff, our Associates and those who Visit with us, commit to keeping children and young people safe and protected and behave appropriately towards them and that we as an organisation do not put child and young people at risk of harm, abuse or exploitation.

The 2017 version of the Safeguarding Children and Young People Policy, therefore, rightly extends its protective coverage to reflect the nature of our work and the continued concern we have to keep all children and young people we support, safe from harm.

2. Why does the Safeguarding Children and Young People Policy apply to Plan International, Inc. and its Member National Organisations? The National Organisations are autonomous and can set their own standards.

Plan International as a whole is committed to keeping children and young people safe and protected. Setting and maintaining high standards on child safeguarding has long been recognised as fundamental to all parts of the organisation. This is not only because it is at the core of our concern for children and young people, but also because it is a key way in which we manage one of the most significant risks to the organisation.

We also aim to be accountable as an organisation and have made ourselves open to external scrutiny on our safeguarding arrangements.

This involves all parts of the organisation being assessed against our own and international standards for child safeguarding. In order for us to be certified in this respect, it is essential that all parts of the organisation meet the required standards.

As we now work with young people aged 18 years to 24 years, the scope of protection now also extends to these young people that we support (e.g., beneficiaries) or are in contact with through our youth engagement work for example (see question 1 above).

The Safeguarding Children and Young People Policy sets a minimum standard for all of Plan International for keeping children and young people safe and protected. Offices may enhance the standards and requirements set out in the policy (i.e. set higher standards) so as to reflect their local context, practice, requirements and laws.

Note also that the policy asks that associates and visitors either sign up the Safeguarding Code of conduct or to appropriate behaviour protocols developed/approved by the contracting Plan International Manager using the Safeguarding Code of Conduct as a guide. Thus it is fully expected that National Organisations will put in place behaviour protocols which are more relevant for sponsors for example.

Furthermore, the policy is significantly implemented via the attainment of our Safeguarding Implementation Standards which Plan International Directors are responsible for implementing as applicable to their context. This takes into account the people, children and young people the office engages as well as the processes, programmes, projects, events and activities they undertake. Thus application of the policy should reflect the safeguarding risk profile of the office.

FAQ: CONCEPTS, TERMINOLOGY

3. The 2017 version of the policy use the term safeguarding instead of protection. Why is this and how does child safeguarding differ from child protection programming?

Child Safeguarding and Child Protection Programming are separate areas of activity within Plan International and other similar organisations however, they also overlap. There are clear complementarities when it comes to fundamental purpose, as **both areas are aimed at ensuring children are not harmed or abused in any way.** However, the difference between the two, very simply put is that, child safeguarding is about making *Plan International* safe for children, and child protection programming are our interventions to make the *world* safer for children.

The 2017 version of the Safeguarding Children and Young People Policy uses the term 'safeguarding' or 'child safeguarding' to distinguish the more internal, organisational efforts to keep children safe **and** protected, from the externally focused child protection programme work.

Child Safeguarding:
Any organisation or agency working with children has a moral and legal responsibility to take all reasonable measures to ensure that the risks of harm (both intentional and unintentional) to children's welfare are minimised and that children are not exposed to harm and abuse as a result of their contact with the organisation, its staff, its representatives, or their participation in the organisation's projects and activities or as a result of any operational processes and activities. Furthermore, where there are concerns about children's welfare, appropriate actions should be taken to address those concerns. An organisation may be held liable for the failure to take "reasonable steps" to prevent harm and would be considered negligent if its' actions or omissions contributed to the harm.

***Safeguarding young people aged 18 to 24 who we support or are in contact with through or youth engagement work**:*

In many countries there are significant differences in laws that govern the safeguarding of children and young people aged under 18 years and those young people aged 18 years and above (and thus now adults). However, organisations still have a moral and ethical duty to ensure the safety and protection of young people aged 18 years and above whom the organisation has invited to partake it its activities, projects and events and those who are still beneficiaries of the organisation. (Please see question 1)

In Plan International, the organisation's responsibility to keep children and young people safe and protected ('safeguarding') is described in our Global Policy on Safeguarding Children and Young People. The Safeguarding Policy demonstrates our commitment to safeguard children and young people from harm. It makes clear to all what is required in relation to ensuring we remain safe for children and young people, and that whatever we do, we do them no harm.

The policy:

- **governs the behaviour of staff and associates** of an organisation ensuring that individuals do not abuse the power of trust that comes from being associated with the organisation;

- **requires the organisation to rigorously assess and reduce risks** to children and young people they engage with in **all** of the organisation's operations, programmes (including child protection programmes and child protection in emergency responses), processes, projects, activities, initiatives, partner relationships and any other contractual arrangements; and

- **commits an organisation, its staff and associates to report and respond concerns** over a child's or young person's welfare in line with the organisation's procedures on the same.

Procedures associated with the policy provides guidance and standards for - safe behaviour, safe recruitment, safe partnerships, safe programming, risk reduction and appropriate response and reporting, for example.

Child Protection Programming
Plan International's work is committed to supporting the fulfilment of children's rights. One of the Child Rights thematic areas that Plan International has chosen to work in is that of Child Protection.

Child Protection Programming involves the design and delivery of programmes focused on preventing the violation of children's right to protection in the communities and countries in which Plan International works. Work may focus on particular issues such as trafficking, child marriage, child labour, and universal birth registration and on improving external violence prevention mechanisms by working with communities, civil society and government agencies to develop and/or improve local child protection systems (i.e. external/wider society prevention mechanisms). Child Protection Programming work also includes the design and delivery of programmes focused on protecting children from violence, exploitation, abuse and neglect in times of disasters and emergency. In addition to the areas of work listed above, this could include preventing and responding to family

separation, the recruitment of children into armed forces or armed groups, psychosocial distress, sexual violence and dangers and injuries.

4. In my country the translation of the term 'safeguarding' means something other than what the organisation intends it to mean. What can we do?

In some of the countries Plan International works in there is no translation for the term 'Safeguarding' or the resulting translation does not convey the real meaning of the word (for example, the Spanish translation for the word 'Safeguarding' results in a word meaning 'Health and Safety'). If this is the case for your office, then you may wish to use the name 'Children and Young People Protection Policy'.

FAQ: REPORTING

5. The policy requires me to report any safeguarding concerns and breaches of the policy in accordance with applicable local office procedures. Am I expected to report all such concerns that I have?

(See Policy, Roles and Responsibilities, 2.b)

Plan International works in many countries where the situation of many children and young people may be described as 'abusive'. Millions of children and young people live in extremely difficult circumstances where they are denied their basic human rights, are exploited and are in need of protection in a collective sense. Many of these issues are ones that we may tackle through our child protection programme and influencing work (see question 3 – section on 'Child Protection Programming'). The Safeguarding Children and Young People Policy, being an internal/organisational policy does not require that Plan International Staff, Associates and Visitors intervene in the lives of children and young people where abuse is occurring in the "wider sense" as this would be an unrealistic use of the policy.

For this reason Plan International office's local procedures (*which must be consistent with our global procedures on Reporting and Responding to Safeguarding Issues*) are used first and foremost to report and respond to incidents of or concerns about violence against children and young people where the alleged perpetrator/s falls within the scope of the Safeguarding Policy (i.e. Staff, Associates or Visitors).

However, the guidance also covers violence against children and young people which are perpetrated by individuals who are outside the scope of our Safeguarding Policy (i.e. individuals who are not Plan International Staff, Associates or Visitors) where such violence is serious and criminal in nature.

Reporting under the policy can therefore be summarised as follows:

a. Where the **alleged perpetrator is a Plan International Staff, Associate or Visitor**, **all** safeguarding concerns **and** breaches of the policy **(including** those related to our interventions, activities, operations and engagement) must be reported.

b. Where the **alleged perpetrator is outside the scope of the policy (i.e. not a Staff, Associate or Visitor) only safeguarding concerns** relating to sexual abuse and exploitation, concerns which suggest a crime has been committed as per the local legislation, and other serious forms of violence which are reported to the Plan International office/staff, should be reported under the policy.

c. All types of abuse and violence regardless of who the perpetrator is **where local law so requires.**

The above reporting requirement ensures that as an organisation we never ignore serious forms of violence and crimes perpetrated against children regardless of whom the perpetrator might be and ensures that we address **all** safeguarding issues and concerns within own activities.

Within each office there are staff designated for dealing with breaches of the Safeguarding Children and Young People Policy. These staff are known as the Safeguarding Children and Young People Focal Points.

IMPORTANT: If you have a concern, don't worry or waste time wondering whether the concern is something that should be reported under the policy. Simply make a report to your Safeguarding Children and Young People Focal Point and/or the relevant Office Director. They will then take further action to ensure that the issue is addressed and appropriate referrals are made in line with local procedures.

It is the responsibility of your local/engaging office to provide you with written guidance (and training as appropriate to your engagement with Plan International) on how to report and respond to safeguarding concerns and breaches of the Safeguarding Policy (this will include what should be reported and to whom to report)**.** If this is not done, ask to speak to your Office Director or Safeguarding Children and Young People Focal Point.

FAQ: SAFEGUARDING CODE OF CONDUCT

6. Why am I prohibited from disclosing information that identifies sponsored families or children or from using images of children or young person in a manner that puts them at risk of being identified or located (that is unless disclosure/use is in accordance our established procedures)?

(See Policy, Annexe 1 Safeguarding Code of Conduct; 'I will' 'g')

We strive to ensure that children, young people and families that we work with are not only protected, but that their right to privacy is also respected. One of the ways we do this is by ensuring that the identities of children and families do not fall into the hands of those who may wish to harm the child and/or invade the child's, young person's and family's privacy.

For this reason, our Safeguarding Children and Young People Policy prohibits the use of identifying information such as the child's or young person's address, full name, or using the name in conjunction with other personal information (e.g. community, village or town name, birth date, names of family members or school names; and any such information that would allow the child's or young person's location to be identified) and/or image/picture.

Also any image should not contain details which may lead to the identification of the child or young person – for example names of schools should be blurred out.

Appropriate information to use would be, for example, the child's first name, age and country (e.g. Zinnat, 10 years old, Bangladesh).

If for any reason you need to use more information than this, then, for Staff it should always be in accordance with Plan International policies and procedures; and for Associates it should be within the remit of your engagement with and/or subject to explicit consent from Plan International.

Please contact the relevant office Director and/ or Safeguarding Children and Young People Focal Point **if you require information on how to use information pertaining to children and young people Plan International works with.**

7. Why does Plan International prohibit unsupervised contact with children, young people or family members associated with Plan International's work?

(See Policy, Annexe 1 Safeguarding Code of Conduct; 'I will' 'g')

Plan International's Safeguarding Children and Young People Policy aims to not only protect children and young people, but also our Staff, Associates and Visitors.

Unsupervised contact (such contact may include but is not limited to visits and any form of communication via social media, emails, letters etc.) with children and young people we support or are in contact with through our youth engagement work for example (see question 1) may result in inappropriate behaviour or communication going unreported or unchallenged.

Contacts with children, young people we support or family members associated with Plan International's work should always be supervised. This means, for example, that visits to children or family members/ guardians associated with our work will be supervised by a Plan International Staff and/or in line with local procedures. Visits by Plan International Staff will always be accompanied by another staff member and written correspondence will be reviewed by Plan International staff and/or in line with local procedures.

The risks associated with unsupervised contact of adults with children and young people we work with and vice versa:

- Whilst most of our Staff, Associates and Visitors have the best intentions for children and young people we recognise that a small number of individuals who wish to harm, abuse and exploit children and young people do exist. Supervised contact inhibits inappropriate and ill intended behaviour from such individuals and allows other safeguarding procedures to be implemented. In addition, any inappropriate behaviour can and should be reported and dealt with immediately.
- Unsupervised contact with children and young people may lead to unwanted solicitations or requests for gifts or money from children, young people or their families/guardians.
- Unsupervised contact may (and has) sometimes result in false allegations of inappropriate behaviour being made against the adult.
- It is also for these reasons that Plan International requests that, unless required to do so by the organisation[69] you never share your personal contact details (this includes email addresses, phone numbers, social media contacts, postal address, skype name etc.) with nor ask for or accept such details from any child, young person or family associated or formerly associated with Plan International. (Note that there is a defined process of assessing and approving requests from sponsors to continue contact with their former sponsored children aged 18 or over. All staff must channel such requests through this process).

Where contact is supervised, Plan International is able to intercept, put a stop to inappropriate behaviour or communication and take action to protect the child, young person or the adult. In addition, criminal behaviour can be reported to the appropriate authorities. Supervised contact means a safer interaction and relationship for both the child, young person and the adult.

It is important that all associated with Plan International understand the risks associated with unsupervised contact and why Plan International prohibits this type of contact.

8. Some of the codes of behaviour listed in the Safeguarding Code of Conduct are not illegal. How can the organisation hope to enforce this?

The Safeguarding Code of Conduct does not only detail codes of behaviour which harm a child or young person, but also those which may put a staff member at harm and/or damage the reputation of the organisation.

For example, Safeguarding Code of Conduct, 'I will not', 'i' and 'k', respectively forbid Staff (when carrying out work for, or with Plan International) to '*sleep in the same room or bed as a child or young person with whom I am in contact in a work related context'* and *'spend time alone away from others with children and young people with whom I am in contact in a work related context'.*

Neither of these acts are necessarily illegal. However, apart from potentially putting the child/young person at risk, it may lead to misinterpretation of activities and behaviour which would also put the Staff or Associate and the organisation at risk.

Also, organisations all over the world regularly contract staff and prohibit them or limit them from actions that would otherwise be accepted at law.

For example, many organisations have a no smoking policy which prohibits smoking on office premises while smoking is legal nationally. These are examples of binding employment contracts, which if breached, can lead to disciplinary measures but would otherwise be allowed by law. Therefore, it is possible to contractually bind staff to certain types of behaviour that are otherwise legal under national law. This includes prohibition on exchanging money for sex in countries where it is legal or prohibiting relationships with people under the age of 18 years where the local age of consent is younger[70] . (Also see FAQ 9 below).

The Safeguarding Policy and Code of Conduct exist to protect children, young people we work with, staff and the organisation. Breaches of these policies that are not illegal may nonetheless result in the appropriate disciplinary action being taken by the organisation, including where relevant dismissal.

9. Questions on Plan International's prohibition of 'physical/sexual relationships with anyone under the age of 18 years regardless of the age of consent locally.

(See Policy, Annexe 1 Safeguarding Code of Conduct; 'I will not' 'b')

We recognise that internationally there are anomalies around the definition of a child and the age of consent. However, Plan International along with the UN and most INGOs adopt the UNCRC's (United Nations Convention on the Rights of the Child) definition of a child as being anyone under the age of 18 years (regardless of whether national laws recognise the age of majority earlier).

Whilst in many countries that Plan International works in, the age of consent is lower than 18 years, our Safeguarding Code of Conduct prohibits staff from developing physical/sexual relationships with children and young people who are under the age of 18 years (and this under the UNCRC is still under the banner group of children).

In answering questions raised around this code of conduct:

- ***Protecting Children and Preventing Sexual Abuse and Exploitation:*** There is sometimes a difference between local laws and Plan International's commitment to protect children. As a child rights organisation we are fully committed to ending violence against children. We therefore take our responsibility to safeguard children and young people and provide safe environments, including those prevent sexual abuse and exploitation, very seriously.

The prohibition of sexual relationships with children - i.e. any persons aged below 18 years - is a protective measure afforded by our policy to children. **It is not only a requirement of the safeguarding policy but also a requirement of the UN Secretary General's Bulletin of Preventing Sexual Abuse and Exploitation** (UNSGB PSEA) which Plan International signed up to in 2003.

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69 For example; when a child or young person reports alleged abuse and the Safeguarding Children and Young People Focal Point needs to take their details, or when a child or young person attends a Plan International supported event or are engaged with the organisation through our youth engagement activities and contact details are required. Such instances will always be requested in line with established procedures, documented an authorised by the relevant line manager.
70 Humanitarian Accountability Partnership (now called CHS Alliance) 'Building Safer Organisations Handbook – Preventing Sexual Abuse and Exploitation'.

Additionally, in accordance with the UNSGB PSEA, '*mistaken belief in the age of the child is not a defence'*. It is therefore your responsibility to know the age of the person you are in relationship with. If you are not sure then do not have a sexual relationship with the person[71].

- ***In many countries where Plan International works, the age of consent is lower than 18 years. How can we demand staff to sign a code that prohibits activity allowed by law?*** Please refer to FAQ 8 above.

- ***Does this affect Staff's rights?*** In some countries, employment law states that employment terms and conditions cannot require a party to that contract to sign away their statutory rights and entitlements and unreasonable terms and conditions will generally not be upheld at law. However, this is not a rights based issue. The age of consent is the protective measure afforded by the law of that country to children; it does **not** create any right to have sex with the child.

Signing an employment contract that prohibits sexual activity with a child is **not** signing away a right or an entitlement.[72]

- ***The issue of "consent":*** Most national laws refer to the 'age of consent'. In most environments where we work, the difference in power between staff and a "consenting" child makes it difficult to determine whether consent is real or makes any consent invalid. (Important: please also read FAQ 10 below). So even if local laws or customs regard relationships with a child under 18 years as consensual and non-exploitative, they have the potential to put Plan International's reputation at risk and may be seen by our stake holders and others in the humanitarian community as an abuse of power and trust or as a conflict of interest. It undermines the credibility and integrity of our work.

The Safeguarding Codes of Behaviour are our terms and conditions for working and engaging with us. If any staff member feels that the requirements are impossible for them to adhere to, they can always exercise their choice to seek an alternative employer.

10. Questions on Plan International's prohibition of sexual relationships between staff and young people direct beneficiaries aged 18 to 24 years.

(See Policy, Annexe 1 Safeguarding Code of Conduct; 'I will not' 'c')

In addition to responses given under FAQ 9.

- **These groups of young people are adults and can make decisions about who they wish to be in a relationship with. Does this code not place a restriction on the behaviour of young people?** The Safeguarding Children and Young People Policy is about **'us'**. The Safeguarding Code of Conduct places restrictions on the behaviour of staff and associates, and not on those of children and young people we work with(although programme staff working with children and young people are expected to develop child/young people to child/young people codes of behaviour in consultation with them).

- **A staff member and a young person aged 18 to 24 years, both being adults are able to have a consenting relationship. Why would the organisation prohibit such a relationship?** Where the young person/beneficiary of Plan International is aged over 18 years and thus considered an adult, who is able to have a consenting relationship with a Plan International staff, the issue of consenting adults in such a relationship can be debated. There is an imbalance of power between the two individuals weighted in favour of the Plan International staff and thus a high risk of sexual and emotional exploitation.

It is very common, and within the legal frameworks of most countries, to prohibit anyone in 'a position of trust from having any sexual contact with a person in their care or with a person who is in a client relationship with them'. The individual in a position of trust has a responsibility to look out for the best interests of the person/client in their care.

For example, many professions make it clear that even where 'consent' appears to have been given, consent will be deemed to be invalid by virtue of a relationship of power. Therefore a sexual relationship is banned even where the young person is over the age of consent or an adult.

Professions which are bounded by such professional codes of behaviour include teachers, doctors and counsellors, for example where those in these professions would be breaking the law if they had sexual relationships with their students, patients or clients irrespective of whether these individuals are aged 18 years or over.

Plan International Staff are placed in actual or perceived positions of trust and responsibility with children and young people, including those beneficiaries who are aged 18 years. Furthermore,

71 UNSGB PSEA FAQ November 2008
72 Humanitarian Accountability Partnership (now called CHS Alliance) 'Building Safer Organisations Handbook – Preventing Sexual Abuse and Exploitation'.

as staff of the organisation providing services for, benefits to or working with children and young people, we are in a position of power.

As detailed in FAQ9 sexual relationships with any child (i.e. individuals aged below 18 years) is prohibited.

Where a young person is aged 18 years and above, only sexual relationships with those young people who are direct beneficiaries is prohibited. This recognises the inherent unequal power dynamics that may exist in such relationship which increases the risk of exploitation.

There may be exceptions in the case of incentive workers and community volunteers who live in communities where we operate and so on rare occasions, relationships may develop that may be seen as acceptable in the community but would breach this element of the code. However, these will be dealt with on a case by case basis. We expect Incentive Workers and Community Volunteers working in Programme areas to make known to the relevant manager any potentially compromising relationship they are in or considering, that involve a beneficiary who is aged 18 years and above

It is important that we maintain the highest professional codes of behaviour which protect children and young people upholding their best interests, protect staff, protect the organisation and the credibility and integrity of our work.

The Safeguarding Codes of Behaviour are our terms and conditions for working and engaging with us. If any staff member feels that the requirements are impossible for them to adhere to, they can always exercise their choice to seek an alternative employer.

11. What about local/commonplace/traditional practices that conflict with the policy?

In many countries where we work there are different understandings of what is considered harmful to children and young people. Some local norms or modes of behaviour will challenge the implementation of the policy.

Each Plan International office is expected to identify country specific issues around keeping children and young people safe (such as female genital mutilation, physical punishment and child marriage) and develop local guidelines and procedures that fit with the local context and are in line with Plan International's position on the same. This does not mean that Plan International accepts norms and values that condone abuse or inappropriate behaviour towards children. We have a responsibility to challenge behaviour and seek to change practices that result in harm to children. We cannot advocate on these issues and at the same time accept behaviour and practices which do not support the safeguarding of children and young people.

All but one of the countries in which we work has ratified the United Nations Convention on the Rights of the Child (UNCRC). These internationally agreed standards are at the heart of Plan International's Safeguarding Children and Young People's Policy.

12. Why am I expected to adhere to the principles of the Safeguarding Children and Young People Policy outside of work or in my personal life?

(See Policy Annexe 1 Safeguarding Code of Conduct, last paragraph)

It is important as an organisation committed to the realisation of children's rights and keeping children and young people safe and protected that we set high standards for ourselves with regards to how we interact with children and young people at all times whether it be during work hours or in our own personal lives.

Creating positive changes for children and young people requires each one of us to take individual responsibility to ensure children and young people are protected. In addition to this, your behaviour, both professional and personal, is always associated with and reflects on the image of Plan International.

The Safeguarding Children and Young People Policy places a requirement for Staff, Associates and Visitors to apply high standards of behaviour towards children and young people and uphold the principles of the policy at all times. This is also in line with current best practice thinking amongst leading NGOs working with children. It is important for Plan International staff in particular to 'practice what we preach' at all times.

Sanctions, as detailed in the Safeguarding Children and Young People Policy, will be applied in cases of breaches of the policy or failure to meet the standards of behaviour set out in the policy.

13. As I am expected to uphold the principles of the Safeguarding Children and Young People Policy outside work or in my personal life will offices be policing the personal lives of staff?

(See Policy Annexe 1 Safeguarding Code of Conduct, last paragraph)

It would not be practical or desirable for managers to actively monitor compliance with the Safeguarding

Children and Young People Policy outside of work. With regards to staff, managers have a responsibility to support the ethos of the policy and to ensure that all staff fully understand the policy and the implications of the policy at both work and outside of work. In addition, regular training and awareness-raising activities (including discussion between staff and their managers at supervisions and in team meetings) will strengthen implementation of the policy. It is important that Staff and Associates understand that the principles of the policy should be upheld at all times and that Plan International will take action against any breaches which come to light whether those breaches have occurred during or outside of work hours

FAQ: GUIDELINES FOR IMPLEMENTING SAFEGUARDING IN PRACTICE

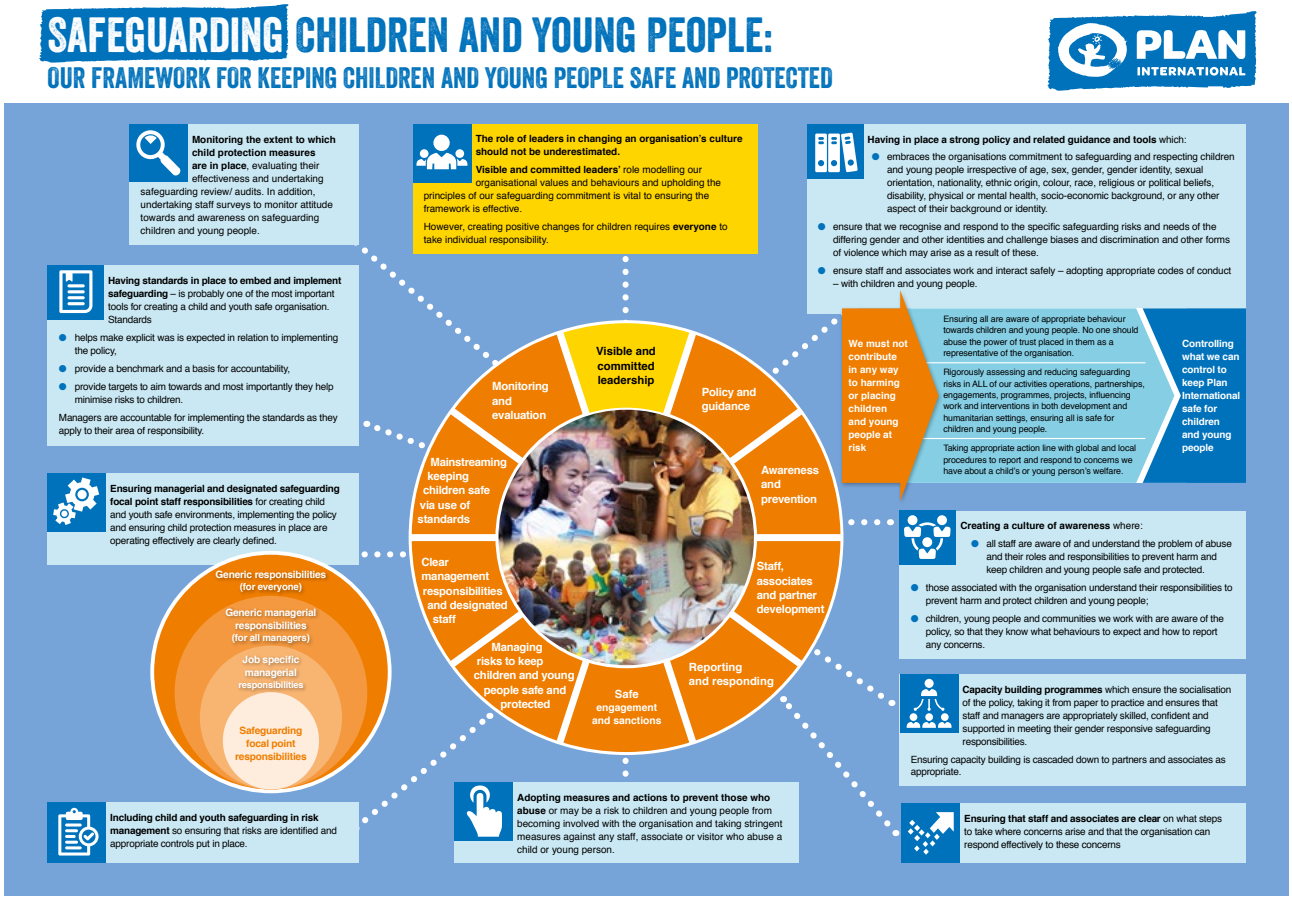
14. Why have we included guidelines for implementing safeguarding in practice as an annexe to the Policy?

These guidelines outline the safeguarding requirements that may be required of all organisations that work with Plan International in carrying out its programmes involving children and young people and particularly those that have contact with children and young people beneficiaries, work with children and young people beneficiaries and/or whose projects, programmes, processes, activities, advocacy and influence work impact on children and young people.

It is necessary to provide assurance to our donors that organisations we fund and with whom we work are held accountable for keeping children and young people safe and protected. Many of our donors have safeguarding requirements that we must adhere to and which they expect us to flow down to partners we have engaged to work with on the donor funded activity.

The policy is also used as a communication tool. These guidelines communicate to organisations we fund and work with, from the outset the importance we place on keeping children and young people safe and protected.

APPENDIX 4 – PLAN INTERNATIONAL'S SAFEGUARDING FRAMEWORK















ABOUT PLAN INTERNATIONAL

Plan has been working for and with children for more than 75 years. We currently work in 50 low and middle income countries across Africa, Asia and the Americas to promote child rights and lift millions of children out of poverty. We focus on the inclusion, education and protection of the most marginalised children in partnership with communities, local and national government and civil society.

Plan works with more than 90,000 communities each year, covering a population of 78 million children. Plan is independent, with no religious, political or governmental affiliations.

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