



CHILDREN SAFEGUARDING POLICY

Of First Children's Embassy in the World Megjashi

ABSTRACT

All children, wherever they live and whatever their circumstances, have the right to be protected, nurtured and free from all forms of violence, abuse, neglect, maltreatment and exploitation as set out in the Convention on the Rights of the Child.

Respecting and supporting this right is the essence of child safeguarding.



ABOUT MEGJASHI

The First Children's Embassy in the World – Republika Makedonija, established in April 1992, is a non-partisan, non-governmental and non-profit association working in the child protection field. It was the first registered international non-governmental organization in the Republic of Macedonia, established in order to protect the rights of the children in the transition period, with a mission to advocate and protect the rights of children in Macedonia. The First Children's Embassy Megjashi is recognized as the leading Macedonian NGO for advocating and promoting children's' rights. In 2001 Megjashi was the first ever recipient of an award for civil society and democracy given in recognition of its lasting and sustainable contribution to the establishment of democratic society in Macedonia through its work for the rights of children. First Children's Embassy Megjashi is a member of Eurochild, ECPAT and Child Helpline International.

Mission

The First Children's Embassy in the World Megjashi advocates and protects the rights of children, encourages responsible parenting and respect for the child's personality, strengthens the civil movement for children's rights, promotes child participation and advocates for functioning of institutions in the best interest of the child. Megjashi promotes peace education, developing active citizenship based on the principle of non-violence and nurturing diversity and equal opportunities for all.

Vision

A fairer world for every child.

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Purpose and Description	This policy and related procedures describe FCEW Megjashi’s commitment to child safeguarding. The purpose of the policy is to ensure that FCEW Megjashi is safe for children by promoting awareness and prevention to mitigate the risk of or actual harm that may come to children by representatives across all programming, operations, campaigns, and activities.
Audience	<input checked="" type="checkbox"/> All staff of FCEW Megjashi <input checked="" type="checkbox"/> Assembly members <input checked="" type="checkbox"/> Volunteers <input checked="" type="checkbox"/> Partners, vendors, suppliers, consultants and others with whom we provide assets in exchange for services or products (collectively, “Partners”) <input checked="" type="checkbox"/> Children
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I. Introduction

First Children's Embassy in the World (FCEW) Megjashi is the leading children's rights organisation in Macedonia. One of the absolute fundamentals we have to ensure is that our programmes are safe and secure for children. We are firmly determined to do everything in our power to ensure that every child in our programmes feels safe. Child Safeguarding means that we have a set of internal policies, procedures and practices to ensure that FCEW Megjashi provides safe and secure operations for children.

FCEW Megjashi's work aims to ensure that the rights of all children are recognised in accordance with the UN Convention on the Rights of the Child. Article 19 of the Convention describes how the State Parties shall protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse.

FCEW Megjashi considers that all the above entails a violation of children's rights and that all children have the same right to freedom from such violations. This policy is a complement to FCEW Megjashi's Statute, Code of Conduct, and covers FCEW Megjashi's responsibility for protecting all children in our programmes from all forms of injury, abuse and exploitation. The Code of Conduct sets out the professional conduct and good practice expected of FCEW Megjashi staff and representatives in relation to children.

Fundamental values

FCEW Megjashi shall be a safe and secure organisation for children. We have zero-tolerance approach to all forms of discrimination, violation, violence, sexual abuse and exploitation of children, and do not accept any behaviour that breaches this policy. This means that all staff, all representatives and partner organisations have an obligation to have read the policy, and to share the basic philosophy and follow the obligations defined by FCEW Megjashi. We are strongly committed to children's right to freedom from all forms of violation, violence, abuse and exploitation, and our basic philosophy is that:

- a child is any person under the age of 18 years
- all children are of equal value and have the same rights, and must never be discriminated against, irrespective of the child's or parent/guardian's skin colour; gender, gender identity or gender expression; language; religion; political or other views; national, ethnic or social origin; property; functional variation; sexual orientation; civil or other status
- all children have a right to freedom from discrimination, and abuse, such as physical abuse, psychological abuse, neglect and sexual abuse, injury, sexual abuse and exploitation
- FCEW Megjashi works to ensure that children are aware of their right to be free from discrimination, violation, injury, sexual abuse and exploitation, and we shall inform them of this right
- FCEW Megjashi has an obligation to ensure that all our staff and all our representatives as well as staff in partner organisations, no matter where they are based, apply best possible practice in their behaviour towards children in both their professional and private lives.

Why do children need safeguarding?

Child abuse includes all forms of physical and emotional ill-treatment, sexual abuse, neglect or negligent treatment, and commercial or other exploitation resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

The impacts of abuse on a child's physical, mental and emotional health can be severe and long lasting. Global studies suggest child abuse remains rampant. Violence and abuse against children often remain hidden because of the reluctance of victims to disclose their abuse, seek help to cope with the experience or take action to protect themselves from further victimization.

In most circumstances, children are less powerful than adults and this makes them inherently more vulnerable. Therefore, it is the responsibility and duty of adults to protect children from harm and respond in situations where children are at risk.

Since risks may become incidents in very different situations – ranging from physical and sexual abuse to violation of a child's data privacy to impacts of a viral advertising campaign – FCEW Megjashi will carry out a safeguarding risk assessment for each and every project and/or activity to identify which issues are relevant for them to address.

What is child safeguarding?

Child safeguarding is the responsibility that we have to make sure our staff, operations, programmes and partners do no harm to children, i.e. that they do not expose children to the risk of harm and abuse, and that any concerns we have about children's safety within the communities in which we work, are reported to the appropriate authorities. "Do no harm" is a principle that refers to FCEW Megjashi's responsibility to minimise the harm we may be doing inadvertently as a result of our organisational activities.

Child safeguarding refers to all of the actions we take to keep all children we come into contact with safe – and includes the proactive measures put in place to ensure children do not come to harm as a result of any direct or indirect contact with FCEW Megjashi. Child safeguarding encompasses the prevention of physical, sexual and emotional abuse, neglect and maltreatment of children by employees and other persons whom the FCEW Megjashi is responsible for, including consultants, partners, visitors to premises and volunteers.

Child protection is only one part of child safeguarding, which is the umbrella that covers all the child-centred actions and measures that Megjashi puts in place in order to prevent or reduce the likelihood of concerns arising (e.g., codes of conduct, safe recruitment procedures, policies and safe recruitment practices, training and communication). Despite these preventive measures, however, protection concerns about a child may still appear.

Child protection is an important part of safeguarding and refers to the actions FCEW Megjashi takes to address a specific concern that a particular child is at risk of significant harm due to her or his contact with FCEW Megjashi's staff, volunteers or partners. Child protection is essential if there is a concern that a child is being abused or his or her safety is compromised.

How is child safeguarding different from respecting child rights?

Freedom from abuse is every child's right, and safeguarding children against abuse is one part of our responsibility to respect and support child rights. But FCEW Megjashi's responsibilities extend to ensure that child rights – from the right to education and health to the right to be free from child labour and discrimination – are respected in all aspects of our activities. This includes not only safeguarding against abuses by employees and partners, but also ensuring that child rights are respected at each stage of the Megjashi's value chain, beginning with the risk assessment when designing a project, organization and implementation of activities, to procurement of materials and continuing on to the use of services by children.

Child safeguarding: an overall approach

An overall approach to child safeguarding is rooted in understanding the risks to children from Megjashi (its staff, programmes and operations) and addressing those risks with measures that create child-safe organisation. Acknowledging risks and implementing measures to address them is fundamental to our strategies and governance. The more this is recognised, the more risks can be prevented. How Megjashi as organisation responds to abuse is what is crucial for the child and for the organisation.

Scope

Every child in our programmes shall be protected from all forms of violation, injury, physical, psychological and sexual abuse, and sexual exploitation through compliance with the present policy and its annexes.

The children in our operations and their families/caregivers shall be aware of and understand the importance of this policy and FCEW Megjashi Code of Conduct. They shall be informed of how deviations from the policy are to be reported.

This policy must be clearly visible and accessible to all staff, all representatives and partners. There must also be a child-friendly version.

Contact persons for Child Safeguarding will be designated by the Operational Director.

The rights of the child are of primary importance. Every effort must be made to protect the rights of the child in any investigation. The safety and security of the child come first.

The policy is applicable to:

1. All staff, irrespective of whether they work full or part time, internationally or within Macedonia
2. Staff who are employed on short-term contracts, e.g. consultants, researchers, etc.
3. Active members, volunteers, and Assembly members
4. Children who are active and/or participate in our programmes will be informed in appropriate form according to their age, mental stage of comprehension, language and cultural background etc
5. Staff and representatives of partner institutions (schools) and individuals, groups and organisations with a formal/contractual relationship with FCEW Megjashi that involves contact with children – unless it has been agreed that the partner organisation may apply its own child safeguarding policy
6. Donors, journalists, politicians and other people who visit FCEW Megjashi programmes or offices and who may come into contact with children

Definitions of harm

It is difficult to define “harm” to children because children can be abused in so many ways depending on the context and culture. They may be abused in a family, an institution, community or faith setting, or via social media/internet. They may be harmed by an adult or adults or another child or children. There are also practices such as forced or early marriage that cause significant harm to children. Although the definition of harm is rather broad and depends indeed on context, there is a worldwide recognition and agreement on forms of violence /and abuse. According to WHO, “Child maltreatment is the abuse and neglect that occurs to children under 18 years of age. It includes all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial

or other exploitation, which results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. Exposure to intimate partner violence is also sometimes included as a form of child maltreatment."

Physical abuse: The act in which a person causes a child physical injury, illness or pain, or subjects the child to neglect or similar. This may involve the person hitting the child with or without an implement, pinching, kicking, pushing, throwing, shaking, pulling the child's hair, scratching or biting the child, stepping or stamping on the child, or forcing objects into the child's mouth. Physical abuse also includes poisoning, burning, scalding, scratching, and trying to drown or suffocate the child. Any form of corporal punishment is considered physical abuse of children.

Psychological abuse: Psychological abuse includes severe punishment, ridicule, criticism, mockery, disparagement, rejection, freezing out, unreasonable demands, forced isolation from social contacts and ageappropriate activities, and constant refusal to listen to what the child has to say. Certain harmful experiences shall also be considered psychological abuse, for example if the child is forced to witness (see or hear) violence in his/her immediate environment or live in an environment where there is frequent violence or threats of violence. All forms of physical abuse of children, including sexual abuse, involve psychological abuse.

Sexual abuse: Covers all forms of sexual acts forced on a child by another person. Sexual abuse means that the other person is exploiting the child's position of dependence, and the act is based on the other person's needs, violates the child's integrity, takes place against the child's will, or is something that the child cannot understand, is not mature enough to undertake or cannot give informed consent to.

Sexual exploitation: Actual or attempted abuse of a child's vulnerable position for sexual purposes based on a position of power or trust. This includes, but is not limited to, promising the child monetary, social or political gain through sexual exploitation.

Sexual abuse online (through the internet): Covers all forms of sexual abuse, physical and non-physical, forced on a child by another person through the internet. FCEW Megjashi shall pay attention to, prevent, and act and report on this form of abuse of children.

We, at FCEW Megjashi shall do everything to prevent, report and act on the above events.

All staff, Assembly members, volunteers and partners of FCEW Megjashi shall strive:

- to plan and organise their work and workplace in such a way as to minimise the risk of children being exposed to abuse, exploitation, injury or other violation of their rights
- to promote an environment characterised by openness concerning children's vulnerability to abuse and exploitation, where all questions or views can be explored and discussed
- to empower children and their families/caregivers and talk to them about their rights, what is acceptable and unacceptable, what they can expect from their interaction with FCEW Megjashi and what they can do if any problems arise
- to work proactively to protect children, not least in connection with disaster relief work

II. Prevention

Awareness: Reducing the risk of harm by staff, volunteers and associates

Whilst it is difficult to contemplate, there are staff, volunteers and associates who do harm children, whether deliberately or through a lack of understanding of what constitutes abusive behaviour. To reduce this risk, Megjashi must ensure that all are informed about this policy and act in accordance with all its provision. This obligation of “do no harm to children” on staff, volunteers and associates to keep children safe extends to their conduct towards children with whom they have contact, outside the work environment as well as inside.

FCEW Megjashi will ensure that this policy, the Code of Ethics, and reporting procedures are publicized, accessible, and made available to children, their caretakers, all staff & representatives, and all relevant third parties and stakeholders in a language and format they understand.

Children and their caretakers must be made aware of procedures for reporting concerns, complaints, or violations of this policy.

Implementing partners are responsible to take preventative measures to protect children involved in programming. All partners must be made aware of procedures for reporting concerns, complaints, or violations of this policy and its accompanying procedures.

Journalists, politicians, celebrities & talent promoting and making visible the programs we implement across the globe are responsible to protect children from harm. All such persons are required to receive and review this policy.

Guests traveling to program sites with or on behalf of FCEW Megjashi are required to receive and review this policy.

Recruitment and Assessment

Safe Recruitment means using recruitment processes that help keep children safe, including robust safety checking. FCEW Megjashi will only recruit representatives who are suited to work with children. Strict child-safe recruitment practices apply to all candidates, which include but are not limited to comprehensive background screening in the jurisdictions, thorough interviewing procedures, and robust reference checks (Annex 1).

The Children Safeguarding Policy is signed by all staff and is a binding commitment that the employee agrees and is committed to following all safeguarding policies and procedures, both in their professional and personal interactions with children.

FCEW Megjashi will outline its commitment to child safeguarding at the earliest opportunity in recruitment adverts, interviews and as part of contracts of employment. Staff, consultants and volunteers should be recruited to clear job or role descriptions that include a statement on the position or role’s responsibilities to meet the requirements of the organisation’s child safeguarding policy. All interviews should include a discussion on child safeguarding, the candidate’s understanding of this and the organisation’s commitment. Contract offers for those whose work will bring them directly into contact with children, or gain them access to children’s information, should be dependent on suitable references and criminal record checks.

Checklist for recruitment and selection

1. When you are designing the job description, analyse the role and think about the issues of child safeguarding and risk in that job:

- What contact with children will the job involve?
 - Will the employee have unsupervised access to children, or hold a position of trust?
 - What other sort of contact may the person have with children (e.g via email, phone, letter, internet)?
2. Develop clear job descriptions, terms of reference/role briefs for all posts including where short-term contracts, consultants are being recruited.
 3. Make sure that the selection-criteria outlines the relevant experience needed if the post involves direct work with children.
 4. Make sure that the commitment to keeping children safe is included in details of any post sent to prospective job candidates.
 5. Develop application forms that ask for consent to gain information on a person's past convictions/pending disciplinary proceedings.
 6. Ask for documentation to confirm identity and proof of relevant qualifications.
 7. Make sure you have a well-planned interview process and ensure the interviewers have the relevant experience of and knowledge about child safeguarding and best practice.
 8. Include some specific questions in the interview that draw out people's attitudes and values in relation to the protection of children. Can they give examples of where they have acted to protect a child, what they learnt from this, what impact it has had their current practice?
 9. Take up to three references including some from previous employees or others who have knowledge of the candidate's experience and suitability to work with children.
 10. Verify the identity of referees
 11. Conduct as many background checks as possible.
 12. Consider the use of probationary periods of employment to ensure suitability once in post.

* Adapted from Nolan, P (2004) The role of HR in Child Protection, People in Aid, taken from Keeping Children Safe (2014) Child Safeguarding Standards and how to implement them

The role of the Child Safeguarding Focal Person

The role and responsibilities of the Child Safeguarding Focal Person (CSFP) is to support the FCEW Megjashi's operations with the day to day implementation of the Child Safeguarding Policy. The CSFP is the person who is first contacted in case of concern for the protection of any child.

Specific duties include:

- To act as the main point of contact within the delegation for child safeguarding
- To ensure that staff, volunteers, representatives and partners are aware of the Child Safeguarding Policy and their responsibilities within it (providing training, guidance etc.)
- To advise and support staff, volunteers, representatives and partners with the implementation of the policy, including risk assessment
- Establish links with local specialist child welfare, health and law enforcement contacts in order to have information available if an incident occurs and/or external advice is needed
- Ensure that the policy and our commitment to children's rights is made known to children, families and communities who work with us and that the policy is available
- To act as first point for concerns regarding child protection incidents and to raise those concerns to the senior management
- Keep an accurate record of any incident
- To support the implementation of the policy by providing an annual report to the operational director together with a plan for further action required to implement the policy

Skills and characteristics of the CSFP:

- Have a knowledge and experience about child safeguarding and child protection
- Have respect and authority within the organization so that their opinions are valued

- Be approachable, with good communication skills with adults and children
- Be able to keep calm when concern is raised, especially if a child needs assistance
- Be able to work with others to ensure that the policy is implemented, and respond where a child protection incident occurs
- Commitment to safeguarding children and upholding their rights – together with the ability to advocate for and defend safeguarding
- Training and presentation skills
- Be able to keep information confidential.

Building child-safe projects and programmes

FCEW Megjashi designs all its projects and programmes in a manner to minimise the risk of harm to the children we come into contact with or impact upon directly or indirectly by taking sufficient account of child safety, whatever the focus of the work.

A child safe project must ensure that it takes account of the environment, context and impact (intended or unintended) on the children and communities it is engaged with. Megjashi determines the context in which we are working and employs risk assessing to all proposed programmes, adapts programmes so they become safer for children including additional safety strategies during the implementation phase.

When planning activities, various considerations need to be taken into account in order to avoid risks. These include the following:

- Recognising that the family or community do not always welcome the participation of children in such activities.
- Ensuring that particular care is taken to ensure preventative measures are put in place to safeguard children if activities or events are to take place in unfamiliar places and outside family care.

FCEW Megjashi's Code of Conduct: Our commitment and responsibilities

All staff and all representatives of FCEW Megjashi, including Assembly members, volunteers, external collaborators **are committed to:**

- treat children and their families with respect and equally;
- provide an enabling environment for children's personal, physical, social, emotional, moral and intellectual development;
- help children to take part in decisions which concern them;
- maintain a culture of communication and create trust with the children and their families;
- use non-violent and positive behavior methods when supervising children;
- be aware what constitutes violence, abuse and exploitation;
- recognize signs of abuse and report suspicions immediately to the Safeguarding Policy Focal Person;
- respect the confidentiality of children;
- ensure that there is a minimum of two staff members present in meetings with children;
- ensure that a child who is to take part in an activity without being a beneficiary, e.g. in a campaign, prize ceremony, panel or some other event, or in social networking online, is protected by this policy.

All staff and all representatives of FCEW Megjashi, including Assembly members, volunteers, external collaborators **must not**:

- violate child rights, abuse and exploit children;
- engage in any form of sexual activity with children regardless of the legal age of sexual consent;
- perform activities for children that they can do themselves, including dressing, bathing;
- discriminate, shame, humiliate, children;
- invite a child or their relatives to home or develop a relationship with a child and/or their family which may be considered outside normal professional boundaries;
- show the faces of children who are exploited sexually, victims of trafficking, in conflict with the law, or who can easily be located even if their identity has been modified;
- act in ways that may place a child at risk of abuse, including not giving due consideration to assessing and reducing potential risks to children as a result of implementing activities;
- transport a child alone;
- be alone with a child in any circumstances that might be questioned by others.
- talk to or touch children in ways that may be perceived as inappropriate or offensive, or making suggestions that may be perceived in the same way
- expose children to situations that they cannot understand, are not sufficiently mature to deal with and to which they cannot give their consent
- act with the intention of making children feel guilty, degraded, devalued or shamed, or otherwise expose a child to emotional abuse
- overlook or participate in children's behaviour that is illegal, dangerous or wrong
- sleep in the same bed or room as the children we meet in our work, unless this is necessary for the safety of the child and has been agreed in advance with a superior or independent third party. This arrangement must be put in writing, explained and notified to the responsible regional contact person, who will forward it to the central contact person

Learning and development

Child Safeguarding training will be available and delivered to all staff, representatives and relevant staff of partner agencies. Training will include a review of the Child Safeguarding Policy, guidance on promoting a culture where children's rights are observed, how to identify potential harm to children, and how to report allegations and suspicions of abuse. The training of the new employees will be conducted in the first month of employment

Partners

FCEW Megjashi when partnering identifies core activities to ensure the integration of required child safeguarding practices.

All agreements with partners must include the requirements of this policy. If a partner elects to use its own policy, the partner policy must be of equal or higher standard for protecting and recognizing the rights of children.

All partner agreements must include information on guidelines & procedures of safe recruiting, reporting suspected or known policy violations, and conducting risk assessments to ensure the safety of children during its programming activities.

III. Reaction and Protection

Reporting

Megjashi shall report on suspected or actual child abuse even though it may not be due to organisation's programmes or operations. This will be reported to the Police, Social Care Centres, Public prosecutor, Ombudsman and other authorities. The reporting process will ensure that children and their families are not put at further risk or made vulnerable by the very action of reporting harm and/or abuse.

All reporting must take place immediately, within 24 hours to the Safeguarding Policy Focal Person – using the safeguarding reporting form (annex 3).

The guiding principle here is that the safety of the child is always the most important consideration.

The following section clarifies what is meant by 1) incident reporting, 2) near miss reporting (A Near miss is an unplanned event that did not result in injury, illness, or damage – but had the potential to do so), 3) notification of concern or 4) reporting to the police.

- 1) incident reporting - If there has been a breach of the present policy in our own programmes, reports are made in and to our own organisation, in accordance with our reporting procedures. A child has been exposed to intentional or unintentional injury, violation, discrimination, some form of physical or psychological violence, sexual abuse or exploitation.
- 2) near miss reporting - failings in our operations that could have breached the Child Safeguarding policy but where no child has come to harm as yet. Near miss reporting is an important part of ensuring that FCEW Megjashi's operations are safe and secure for children but also an important element in continuously strengthening and improving our own operations and our procedures. Reporting must be carried out irrespective of the level of risk; anything that increases the risk of harm to children must be reported.
- 3) notification of concern - All staff and all representatives of FCEW Megjashi and our partner organisations must act in accordance with this policy in both their professional and private lives. This means that we must act if we find out or are concerned that a child is coming to harm, even if this is not within our own programmes. In this case, we do not follow the incident reporting procedure described above, but notify our concern to social services in the municipality where the child lives.
- 4) reporting to the police - If the law has been broken in connection with harm to a child, even if this is not within FCEW Megjashi's own programmes, this must be reported to the nearest police station, provided this does not put the child at risk.

Reporting procedure

FCEW Megjashi's employees or volunteers, or Assembly members, or partners who suspect, observe or are informed of a deviation from the policy shall:

- 1) Inform FCEW Megjashi's designated contact person immediately
- 2) Not pass on details to others unless they have been delegated responsibility for forwarding or responding to notifications.

For each case raised or suspected, records will be stored securely with access limited – only the Child Safeguarding Focal Person and the senior management.

Decisions about child protection incidents must not be made by individual staff in isolation.

The first stage is to decide whether the concerns are **internal** or relate to an **external** situation.

If the concern is **internal** – regarding the behavior of staff, volunteers, interns, you have to consider whether you need to report to the local/national public. If **not**, the internal safeguarding procedure needs to be applied. If **yes**, you have to report to the designated authorities and follow-up on action taken by the authorities and decide on further response, record case and action taken.

Internal Safeguarding Procedure:

- Organisation **will immediately suspend** any employee who is alleged to have violated the Safeguarding Policy, pending the outcome of the investigation;
- Organisation reserves the right to take any **disciplinary action** against any of the above who have been proven guilty in an investigation, which may include reporting the incident to the police;
- **Internal investigation** completed by the Safeguarding Policy Focal Person **will be submitted** to the Executive Director and the Steering Committee Board who will come to a decision about action to be taken;
- Acts of a **criminal nature will be referred** by Megjashi to the police and/or social services and may result in a criminal investigation and conviction;
- When investigating concerns or complaints, the process should be always be fair and, where complaints are upheld, the individual will have the right to appeal the decision;
- Management will come to a final decision, which will be confirmed in writing. The decision from the appeals process is final.

How to make a report?

- A verbal and documented report must be made within 24 hours.
- The discussion with your manager/contact person shall focus on:
 - i. Description of the matter
 - ii. The risks to the child/children
 - iii. Action/next steps.
- Use the relevant form: Child Safeguarding – Incident reporting or Child Safeguarding – Near miss reporting. Ensure that detailed notes are made of all events and note what the child said in his/her own words (if this is possible).
- If the matter requires immediate action, both Operational Director and the responsible manager/contact person shall be contacted as soon as possible during the investigation.
- Immediately seek medical assistance for the child/children if the situation requires.
- the Child Safeguarding Focal Person is reachable immediately for the manager concerned to discuss the case, documents discussions, follows up the details of the response to a report where immediate action was necessary, makes sure that the report is saved in a central confidential archive.
- the CSFP shall draw up action plans to address the needs identified, based on the best interests of the child/children.

The Operational Director is responsible for following up the procedure.

Consequences of breaching the policy

Measures under employment law may be taken with respect to staff who are in breach of the policy or the Code of Conduct. Assembly members may have their membership revoked. All staff and all representatives of FCEW Megjashi and partners must be aware that any claims that they have abused or exploited children will be investigated:

- a) in accordance with the legislation concerning the investigation and prosecution of crimes according to the Criminal Law
- b) by means of FCEW Megjashi's internal investigation process in accordance with established reporting procedures in the case of suspected breaches of the present policy.

IV. Media and Communications

Communication and Media Guidelines

This chapter of the Children Safeguarding Policy sets out the principles that organization pursues for external communication. It contains general principles for ensuring children are kept safe at all times, as well as specific guidelines which must be followed by organization staff as well as photographers, film crews and journalists who accompany or visit the events and activities of the organization. All child protection measures in the Children Safeguarding Policy are equally applicable in media and communication activities including the use of social media. In order to make sure that all children are protected in all situations it is important to obtain written consent of the parent/carer or legal guardian of children that clearly states if they agree that photos or statements of children can be publicly used or not. (Annex 5 includes a specific media consent form).

Principles

The rights and dignity of the child must be respected at all times and the best interests of the child maintained as the paramount concern of our communications. FCEW Megjashi will never use discriminatory or degrading language. This section is providing guidelines on the use of images, films and stories of children for media and communication purposes to ensure data protection and to protect children themselves. Abusers have sometimes targeted children whose pictures they have seen in media and communication material.

In FCEW Megjashi's communications about children, the following principles will apply:

Dignity: The child's dignity must be preserved at all times. Languages must not degrade, victimize or shame the child. In images, children should always be dressed appropriately and should never be depicted in any poses that could be interpreted as sexually provocative. Do not make or disclose photographs of children who are completely naked or dressed inappropriately. Do not present your children as a victim (weak, desperate, etc.). Images should present strength, hope in children, and present them in a 'positive' way.

Accuracy: The portrayal of children must not be manipulated or sensationalized in any way. Images and stories should provide a balanced depiction of the child's life and circumstances, showing the progress that children are making. Communications should avoid making generalisations, which do not accurately reflect the nature of the situation and pictures should not be taken and used out of context.

Privacy: Any information that could be used to identify a child or put them at risk will not be used. FCEW Megjashi must ensure that:

- Only use first names of children: be careful not to reveal details about the place where they live, their school and other information to would lead to their place of residence. If needed for child safeguarding, the names and the image of children must be changed.

- Information about a child/children's life and photographs of children (including information stored on the computer) will be kept in secure files. Access to these should be limited to those that need to use them during the course of their work.
- The recorded images should focus on an activity and, where possible, feature groups of children rather than individuals.
- FCEW Megjashi is committed to represent a broad range of children – boys and girls, of various ages, abilities and ethnic groups in its publications, videos. Organization will ensure diversity of children to be presented in its communication material.

Complaints procedure: Any complaints or concerns about inappropriate or intrusive images must be reported and recorded like any other child protection concern.

Informed Consent

Informed consent must always be sought before taking any photos, videos, or requesting personal information about children's lives that may then be used in organization materials. Informed consent means that children are told how organization may use the information or image/film. Children are free to refuse to publish images and materials around them. They should also be reassured that locations and other identifying information that might to the location of residence of children will be changed. They will need to be asked whether they give consent that their first name is shared with the information or image/film.

Consent must be obtained by completing and signing the media consent form (included in the consent forms in annex 6).

Consent is also required from the child's parent/carer or guardian, who must countersign the form. If this is not possible, then it should be request from the organisation working with children. The organisations working with the children should lead on asking for consent of children and families, as they may feel more comfortable to refuse consent when asked by someone they already know and trust.

The media consent forms and other consent forms will be kept on the child's file by organization.

Obtaining prior written consent, does not mean that there is no requirement to obtain verbal consent at the time of taking photographs/video/interviews.

Interviewing Children

Interviewing children requires skills and certain basic principles should be followed to ensure their dignity and their rights are respected.

Informed Consent: In relation to interviews, informed consent includes explaining what subjects are likely to be covered in the interview and clarifying the child's right to withdraw their consent at any point. The interviewer should review the child's understanding of consent at the start of the interview.

Provision of support: There should be someone else present during the interview, who the child is familiar with. Wherever possible, the child should be given a choice regarding who supports him/her during the interview.

Respecting the right to say No: Be clear before you start the interview that the child only has to talk if they are comfortable doing so, and they can stop and withdraw their consent at any point.

Gender: Consider the different needs of boys and girls and whether they would be more comfortable to talk to a man or a woman. Gender must be considered when deciding what topics may be discussed.

Respecting the right to information: If you are going to take notes, or record the interview in another way, you must explain this to the child and verbally ask their permission to do so.

Visits by Photographers, Films Crews, Journalists and Others

Special care must be taken when organizing visits for external photographers, filming crews, journalists or visitors within the scope of organization projects, activities and publications:

- Journalists, photographers/film crews must be fully briefed about organization's child protection policy before they meet the children, who will be interviewed, photographed or filmed. They should sign their commitment to adhere to this policy.
- Make sure that photographers and filmmakers are not allowed to spend time with or have access to children without supervision. They have to be accompanied by organization staff at all times.
- Children, parents and guardians must be informed about how the film, photograph or story will be used and consent for this obtained. This is distinct to the consent they have given for use of materials by organization they are involved in.
- Copies of images, film and story should be sent to parents, and children.
- In order to protect the confidentiality and privacy of the children, organization must be notified as to how the photographer or film maker intends to use the images or stories. Organization reserves the right to refuse use of photographs, film, stories if it is felt that, in doing so organization is not acting in accordance with child protection policy and media and communication principles.
- If an image or any material is to be used by another organisation, the right to use should be obtained by marking the copyright of the © organization as well as the name of the photographer with an appropriatecaption.

V. Monitoring and Accountability

Accountability: Monitoring and evaluation of the implementation of the Children Safeguarding Policy

The aim of monitoring and evaluating the Child Protection Policy is to learn from practical case experiences, which will contribute to inform policy reviews and changes to the Child Protection Policy. Organization will regularly monitor the implementation of its Child Protection Policy and procedures. Progress, performance and lessons learned are reported every year by the Child Protection Focal Person to the management or board annually and included in organization's annual reports. Monitoring and evaluation will be done by checking whether the standards from the Child Protection Policy are implemented and whether safeguards are working. This will be done by carrying out a survey among organization staff, interns and volunteers on how the standards from the Child Protection Policy are being met, how effective they are and what needs improving.

Next to the overall monitoring and evaluation of the Child Protection Policy, reactive monitoring will take place, after incidences have occurred, which will contribute to a learning process for organization and if necessary changes to the Child Protection Policy or reporting procedures. Every three years an internal review of the policy will be carried out and its results will be approved by the highest management organ. In addition, it is recommended an external evaluator to review the policy and practices. This could be done by Keeping Children Safe.

Responsibility for implementation, compliance, measurement & continuous improvement

The following job positions have responsibility for implementing and following up the policy within their areas of work:

- Managers
- Operational Director
- Safeguarding Focal Point

Policy follow-up

The Operational Director and Head of Research, Development and Sustainability Department are responsible for following up the policy.

Annexes

- Annex 1 – Character references
- Annex 2 – Flowchart for raising concern
- Annex 3 – Procedures and reporting procedures
- Annex 4 – Statement of acceptance
- Annex 5 – Accountability in the organisation
- Annex 6 – Consent forms

Supporting & related documents

Documents that support the policy and its implementation:

- FCEW Megjashi's Code of Conduct
- Child Safeguarding Protocol (forthcoming)
- Guidelines for voluntary work within FCEW Megjashi (forthcoming)
- Child Safeguarding in our communications work (forthcoming)
- Risk assessment for Child Safeguarding (forthcoming)

