Girl Effect
Safeguarding Policy - Global

Policy reviewed & approved by Farah Ramzan Golant (Chief Executive Officer) April 2017
Our Commitment to Safeguarding Children and Young People
This Safeguarding Policy lays out Girl Effect’s commitment to ensuring the safety and protection of all children and young people with whom the organisation engages.

This includes:
- Promoting the welfare of children and young people and enabling them to achieve the best outcomes
- Preventing harm through proactive measures to identify and mitigate risks
- Protecting children and young people by responding quickly and effectively whenever harm or abuse is identified

This policy covers all forms of physical abuse, emotional ill-treatment, sexual abuse, neglect, commercial or other exploitation that results in actual or potential harm. This includes harm which is caused intentionally or unintentionally, directly or indirectly.

Driven by Girl Effect’s Principles

Girl-driven
In order to keep girls safe, we must understand her whole reality. This means actively engaging girls and boys and creating spaces where they feel valued, can voice their concerns and needs without fear and are connected to others who will help keep them safe and protected.

Pioneering
Breaking new ground inevitably involves confronting new risks. Together we will draw on our creative spirit to mitigate these risks and develop new approaches to ensuring the safety of children and young people.

Decisive
Ensuring children and young people’s safety requires all staff and representatives of Girl Effect to be well informed, confident and decisive in their actions. This policy aims to provide all representatives of Girl Effect with the information and guidance they require to take decisive action.

Tech-smart
Girl Effect uses technology to accelerate change for girls. We aim to pioneer new measures that go beyond simply managing the risks associated with technology but which proactively harness the potential of technology to keep children and young people safe.

One
Every child and young person has the right to protection and to a life free from violence and maltreatment. Upholding this right is everyone’s responsibility and requires collaboration across boundaries to solve problems and address risks.
Scope
The policy applies to:
- All staff who are contractually employed by Girl Effect
- All individuals who carry out work, paid or unpaid, in the name of Girl Effect. This includes board members, volunteers/interns and consultants.
- All Girl Effect visitors. This includes journalists, media personnel, investors and any other individual visiting Girl Effect’s work in any capacity.

Girl Effect Partners who are in contact (direct or indirect) with children or young people are expected to have their own safeguarding policies and procedures in place. For more detail see “Safe Partnerships”.

Girl Effect will treat any breach of its safeguarding procedures seriously. Failure to comply with this policy may incur sanctions ranging from disciplinary action (including possible dismissal), termination of contracts or partnerships and, where appropriate, referral to the police or other relevant authorities.

Structure
This policy contains 10 interlinked and mutually reinforcing standards which aim to ensure that Girl Effect is a child-safe organization. No standard can be considered in isolation and each standard must be given equal weight and importance across the organization.

Tools have been developed to support the implementation of each standard and are available Safeguarding folder on the shared drive. Advice on implementation can also be sought from the Global Lead for Safeguarding or local Safeguarding Officers.
Definitions

Child
For the purposes of this policy, a “child” is defined as anyone under the age of 18, in line with the United Nations Convention on the Rights of the Child (1989)

Young Person
For the purposes of this policy, a “young person” is defined as anyone aged 18 - 25. All guidance and procedures contained within this policy also apply to our engagement with young people.

Abuse and Harm
Abuse and harm are closely related concepts. Abuse is simply harm that is so severe or persistent that it is likely to have a lasting effect on the health and development of the child or young person. Safeguarding demands attention to all types of harm (physical, sexual, emotional, neglect, exploitation) whether these reach the threshold of significant harm or not.

Duty of Care
Girl Effect has a legal and moral obligation to:
- Take all reasonable steps to prevent foreseeable harm in any activity or interaction we are responsible for
- Only act within our competence & not initiate operations we cannot do safely
- Always act in the best interest of children and young people

Best Interest Decisions
Decisions that affect children or young people should be made based on consideration of their physical and psychological well-being and the need to prevent harm to them or others. Best interest decisions should be reached in consultation with both the child/young person and those responsible for their care.

Direct contact with children and young people
Being in the physical presence of a child or young person in the context of Girl Effect’s work, whether the contact is occasional or regular, short or long term. Direct contact also includes interaction with children and young people via the internet or telephone, even if a physical meeting never takes place.

Indirect contact with children and young people
Having access to personal information (data) on children and young people in the context of Girl Effect’s work such as names, locations, responses to research questions, photographs, videos or case studies. This also includes data generated or shared by children and young people via digital applications, tools or platforms.

Personal Data
Personal data is any information relating to an individual, whether it relates to his or her private, professional or public life. It can be anything from a name, photo, e-mail address, phone number, posts on social media or responses to surveys. Data can be numerical, descriptive or visual1.

1 Definition adapted from the European Data Protection Regulation 2016
Accountability

Girl Effect will designate responsibility for safeguarding to staff across the organisation to ensure that safety measures are monitored regularly and that any new risks are identified and addressed as quickly and efficiently as possible.

Who is this standard for?
- Members of Girl Effect’s Global board members as well as members of governance structures in-country
- All Girl Effect staff, particularly managers and senior leadership

Drivers Behind the Standard
- Organisational Responsibility – Safeguarding children is both an organizational and individual responsibility. The Girl Effect Board is ultimately responsible for ensuring the safeguarding policy is effectively implemented and that children benefiting from, or working with Girl Effect are not harmed in any way through contact with its staff or operations.2
- No Place to Hide – Abuse thrives on secrecy and abusers seek out organisations with weak communication and accountability structures. Girl Effect seeks to ensure an open culture where all concerns are taken seriously, where sensitive issues are discussed without embarrassment and where risks are addressed promptly and without fear.

This standard is being met when...
- There is a Designated Board Member for Safeguarding within the Global Board and within all the relevant governance bodies in-country.
- There are dedicated Safeguarding Officers in every country, supported by the Global Lead for Safeguarding based in London. Staff with designated responsibility for safeguarding have the skills and knowledge necessary to fulfil their role and receive regular training and support.
- A Global Safeguarding Task Force exists to promote learning and improve practice. The Task Force provides a regular space for Safeguarding Officers to share experiences, reflect on practice and ensures that lessons are learned from our successes and our challenges.
- The implementation and effectiveness of the safeguarding measures are reviewed annually and the Safeguarding Policy is updated based on the findings. The updated policy is approved by the Girl Effect Board.
- Safeguarding performance is reported to Girl Effect’s Global Board and relevant governance bodies in-country on an annual basis or whenever issues arise that may affect the reputation and standing of the organization. Gaps in safeguarding are addressed through an appropriately resourced action plan.
- An independent evaluation of safeguarding procedures is commissioned every 3 years.

Roles & Responsibilities

**Designated Board Member for Safeguarding**
- To act as a point of contact within the Board for any issues relating to safeguarding
- To support the Senior Leadership in managing any safeguarding concerns/investigations which may affect the reputation and standing of the organisation
- To report any serious safeguarding incidents involving Girl Effect staff or other representatives, paid or unpaid, to the Charity Commission in the UK or regulatory bodies in-country

**Safeguarding Officers**
- To promote awareness of the safeguarding policy and monitor its implementation
- To act as a source of support and information for staff on safeguarding issues
- To identify training needs and provide capacity building where needed
- To maintain clear records of any child protection concerns that are reported and the actions taken to address these concerns
- To report any issues or concerns to Senior Leadership in-country and the Global Lead for Safeguarding in London

**Global Safeguarding Task Force**
- To build the capacity of local Safeguarding Officers through sharing learning and best practice
- To promote consistency in the implementation of the safeguarding policy across the organisation
- To analyse data on safeguarding incidents and to generate learning and improve practice
- To develop tools and training to support the implementation of the safeguarding policy
- To conduct an annual review of safeguarding implementation and effectiveness across the organisation
- To coordinate reports on safeguarding for submission to Girl Effect governing bodies

**Tools for Implementation:**
- Safeguarding Self-Assessment Framework
- Terms of Reference: Global Safeguarding Task Force
- Sample Job Description & Person Specification for Safeguarding Officer
Building the know-how to keep children safe

Girl Effect will ensure that all staff, visitors and others undertaking work on behalf of the organisation understand their safeguarding responsibilities and have the knowledge and skills necessary to fulfil their obligations.

Who is this standard for?
- Safeguarding Officers
- All Girl Effect staff, particularly the People Team and Senior Managers
- All consultants and others undertaking work on behalf of Girl Effect
- All visitors to Girl Effect products

Drivers Behind the Standard
- **Mainstreaming protection** – Ensuring the safety and protection of children and young people is everyone’s responsibility, not just that of the Safeguarding Officers. The Senior Leadership must ensure that safeguarding is embedded in their areas of responsibility and that the appropriate levels of human and other resources are in place to ensure the full implementation of Girl Effect Safeguarding Policy.

- **Diverse skills but shared responsibility** - Girl Effect brings together professionals from diverse sectors, many of whom may have little prior knowledge or experience of safeguarding. The organization will equip all staff, irrespective of their area of expertise, to identify risks and contribute to the overall aim of keeping children and young people safe.

This standard is being met when...

**Staff**
- All staff read and sign a commitment to adhere to the Girl Effect Safeguarding Policy prior to commencing work
- Compliance with the Girl Effect Safeguarding Policy is a requirement in all employment contracts
- All staff receive an induction on safeguarding within the first month of work or sooner if their role requires contact with children and young people
- Capacity building on safeguarding is provided across the organization on an annual basis, including refresher training within 3 months of the safeguarding policy being updated.
- Staff with specific responsibilities for child safeguarding receive regular specialist capacity building and have access to the resources and tools necessary to execute their responsibilities

**Visitors**
- Expectations in regards to safeguarding are explained in a briefing prior to any visit which involves (direct or indirect) contact with children or young people
- All visitors sign a ‘Visitor Agreement Letter’ in which they agree to comply with the Girl Effect Code of Conduct and reporting procedures
- Visitors know who to contact in the event of any concerns and are provided with contact details for the local Safeguarding Officer

- Visitors are accompanied by Girl Effect staff whenever in direct contact with children

**Consultants**
- Consultants are provided with a copy of ‘Safeguarding in Girl Effect: Key Principles & Practices’ which they must read and sign a commitment to adhere to.

- Expectations in regards to safeguarding are explained in a briefing prior to undertaking assignments which involve (direct or indirect) contact with children or young people

- Contracts for consultants include a clause requiring compliance with Girl Effect’s Safeguarding Policy and the consequences of a breach.

- Girl Effect completes background checks on consultants working directly with children. For more detail see “Safe Recruitment”

**Tools for Implementation:**
- Child Safeguarding Induction (Staff) PPT Deck
- Child Safeguarding Briefing (Visitors & Consultants) PPT Deck
- Visitors Agreement Letter
- Safeguarding in Girl Effect: Key Principles & Practices – Summary for External Visitors and Consultants
Safe Recruitment

Girl Effect will ensure that its recruitment processes minimize the risk of engaging any individual who is unsuitable to work with children and young people.

Who is this standard for?
- Girl Effect People Team
- Girl Effect Senior Leadership
- Any staff responsible for recruiting staff or selecting consultants.

Drivers Behind the Standard
- Professional conduct, personal values - We seek to recruit staff who are committed to the highest standard of personal and professional conduct. This goes beyond simply complying with protocols, but extends to ensuring that individuals have an appropriate set of personal and professional values and are committed to promoting the safety and well-being of children.
- Recognition of risk – Girl Effect recognizes that some individuals may target organisations in order to gain access and abuse or exploit children. Screening is crucial to mitigating this risk.

This standard is being met when...

Staff
- All Job Descriptions are categorized as requiring either Foundation or Enhanced level checks. This will vary depending on:
  - The level of direct contact with children and young people
  - The level of indirect contact through access to personal data on children and young people
  - The level of responsibility for the design or management of initiatives that engage children and young people (both directly or indirectly).
- The level of background checks undertaken correspond to the categorization for the post-holder. Where specific checks have not been obtained, there is a documented rationale with appropriate authorisation from the Chief Operating Officer.
- Reference checks are clearly documented and available on all personnel files
- Disclosure and Barring Service (DBS) checks are completed for all UK nationals or UK residents whose role requires Enhanced Level checks. DBS checks are renewed every 3 years

Consultants
For all consultants whose work involves direct or indirect with children and young people:
- A DBS check obtained in the past 3 years must be produced. If one is not in place, Girl Effect will ensure a DBS is completed prior to any contact with children or young people. Where such checks are not available (e.g. where the associate is not a UK national or a UK resident), Girl Effect reserves the right to call referees to seek further information about the candidate’s practice in relation to children
- All consultants must provide Girl Effect with two independent referees which are verified by telephone or email. Referees cannot be family members and must have known the candidate for longer than 3 years.
Foundation Level Checks

Who?
All staff, even where the post is unlikely to involve either direct or indirect contact with children and young people.

Checks:
- **A candidate specification accompanies each job description** to help ensure that only people with the suitable knowledge and skills are recruited for the post.
- Candidates complete a full application form and must explain gaps in their employment history.
- **Two references** are obtained from previous employers to check the candidate’s suitability for the post. References should include the last employer. Referees must have known the candidate for 3 years and cannot be family members.
- Staff with Foundation Level checks may, on occasion, visit Girl Effect products or events where they are in direct contact with children and young people. On these occasions, they will be accompanied by staff with enhanced level checks.

Enhanced Level Checks

Who?
All staff where the post involves contact with children or young people; indirect contact through access to children’s personal data; and/or responsibility for the design or management of initiatives which directly engage children and young people.

In addition to the Foundation Level Checks:
- For UK nationals, a Disclosure and Barring Service (DBS) check is completed. DBS checks are renewed every 3 years.
- DBS checks may only be completed for UK nationals or UK residents. **Alternative checks will be included in localized procedures developed by Girl Effect country offices.** Where such checks are not available, Girl Effect reserves the right to call referees to seek further information in relation to the candidate’s practice in relation to children.
- **Employment** referees will be informed that the candidate will have access to children and young people and will be asked about the candidate’s suitability to work with children.
- **Where staff (e.g. Safeguarding Officers) have job specific child protection responsibilities, the interview** includes specific questions designed to bring out their level of skills and experience in this area.

Tools for Implementation:
- Reference Request Form (Enhanced / Foundation Level)
- Interview questions to assess safeguarding knowledge or suitability

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*Only relevant convictions will be taken into account and, in the first instance, only the People Team will know the findings of the DBS check.* If the check raises concern about the candidate’s suitability for the post, a decision about appointment will be made by the Director, People Team in consultation with the Chief Operating Officer. DBS checked information will be securely destroyed after the process and in any event within the timescales laid out in the Home Office Code. See https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/474742/Code_of_Practice_for_Disclosure_and_Barring_Service_Nov_15.pdf
Safe Partnerships

*Girl Effect will ensure that all partners have the appropriate safeguarding policies and procedures in place to prevent harm to children and to respond effectively whenever protection concerns are identified.*

Who is this standard for?
- All Managers with responsibility for the implementation of Girl Effect products, research and events
- All staff who work with partners in the delivery of our work

Drivers Behind the Standard
- **Duty of Care** - Girl Effect has a legal and moral obligation to take all reasonable steps to prevent foreseeable harm in any activity or interaction it is responsible for. This includes a responsibility to ensure that partners acting on our behalf have the competence to fulfil their obligations safely and have the policies and procedures in place to prevent harm or abuse to children and young people.

- **Due Diligence** - The Girl Effect Board is legally accountable for ensuring that the organisation’s funds are used properly and for ensuring that due diligence checks are conducted to **identify** and **verify** who partners are, **assure** they have the capacity and skills to deliver initiatives safely, and **monitor** their activities and conduct⁴. This responsibility is delegated to the Directors and Project Managers for each initiative.

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**Types of Partnerships in Girl Effect**

**Financial Partners:** Organisations or individuals who invest or co-invest (either financially or through in-kind donations) in Girl Effect initiatives but have no direct contact with our staff, operations or children and young people.

**Portfolio Partners:** Organisations or individuals who invest or co-invest (either financially or through in-kind donations) in Girl Effect and work in collaboration with Girl Effect in ensuring delivery on the ground. This may include both direct and indirect contact with children and young people through the co-design and delivery of initiatives.

**Design & Content Partners:** Organisations or individuals who design and produce content for Girl Effect products and campaigns. This may include direct contact with children and young people as well as an indirect impact on children and young people through the materials that are produced.

**Implementing Partners:** Organisations or individuals who are responsible for implementing or co-implementing Girl Effect initiatives who have either direct or indirect contact children and young people. For example, research agencies collecting data directly from children and young people, agencies responsible for facilitating events or activities with children and young people.

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This standard is being met when:

Financial Partners
- Prior to confirming any partnership, Senior Leadership discuss the ethical implications of the partnership. Partnerships are not approved with individuals or organisations whose investments or operations (both past and present) expose children and young people to abuse or exploitation.

Portfolio Partners; Design & Content Partners
- Prior to confirming any partnership, Senior Leadership discuss the ethical implications of the partnership. Partnerships are not approved with individuals or organisations whose investments or operations (both past and present) expose children and young people to abuse or exploitation.
- Where data on children and young people is shared between Girl Effect and the partner, a written Data Sharing Agreement is developed which covers data privacy and security, data ownership, consent for use and re-use of data, sharing and destruction of data
- Where representative of the partner organisation visit Girl Effect products, they are provided with a briefing which includes expectations in regards to safeguarding. All visitors sign a ‘Visitor Agreement Letter’ in which they agree to comply with the Girl Effect Code of Conduct and reporting procedures

Implementing Partners
- Due diligence checks include a review of the policies, procedures and processes that are in place to safeguard children and young people.
- Partners receive a Safeguarding briefing which includes detailed information of Girl Effect’s minimum requirements for safeguarding.
- A written Safeguarding Agreement is compiled with details of the policies and procedures that will be followed in order to comply with Girl Effect minimum requirements. The agreement is signed by the Director of the partner organisation who is responsible for ensuring its implementation.
- Where data on children and young people is shared between Girl Effect and the partner, a written Data Sharing Agreement is developed which covers data privacy and security, data ownership, consent for use and re-use of data, sharing and destruction of data
- Where necessary, Girl Effect provides additional capacity building to ensure the safe practice of partners

Complex Partnerships
- On many occasions, organisations may straddle several different types of partnerships. Where this happens, the category with the highest level of checks will be applied

Tools for Implementation:
- Due Diligence Checklist
- Partnership Safeguarding Briefing PPT Deck
- Partnership Safeguarding Agreement
- Data Sharing Agreement
Code of Conduct

*Girl Effect will ensure that all staff, visitors and others undertaking work on behalf of the organisation comply with the Code of Conduct when interacting with children and young people.*

Who is this standard for?
- All Girl Effect staff
- All consultants and others undertaking work on behalf of Girl Effect
- All visitors to Girl Effect products

Drivers Behind the Standard
- **Organisational Reputation** – Our actions and behaviours can be misinterpreted, no matter how well-intentioned. Allegations of misconduct, whether founded or unfounded, can destroy the organisation’s reputation. Following this code, helps protect the organisation and individuals from accusations of improper conduct.

- **Duty to Act** – Minor breaches of this code should be challenged directly or, where this is not possible or appropriate, the issue should be raised with the individual’s direct line manager. Any breach which places a child at risk of harm or where there is a suspicion of abuse, must be reported in line with Girl Effect reporting and response procedures. Failure to act will be considered a breach of the Safeguarding Policy.

This standard is being met when...
- All staff have read and signed a copy of the Code of Conduct and know when and how to report breaches of the Code of Conduct
- All consultants have read and signed commitment to ‘Safeguarding in Girl Effect: Key Principle & Practices’ which includes the Code of Conduct
- All visitors sign a Visitors Agreement which includes the Code of Conduct
- All partners working directly with children sign a Safeguarding Agreement which includes the Code of Conduct
- Child friendly versions of the Code of Conduct are developed by Country Offices and reflect children’s own expectations of staff and other Girl Effect representatives. These are displayed in spaces where children are engaged in activities
- Children and their parents or caregivers know when and how to report breaches of the Code of Conduct
- **Child Friendly Community Guidelines** are displayed on Girl Effect’s digital platforms of products where users are commenting or sharing their own information, ideas, photos and stories. These explain the expected behaviours when posting on the site and consequences for any violation.

Tools for Implementation:
- Child Friendly versions of the Code of Conduct
- Child Friendly Community Guidelines
- Social Media Guidelines
Code of Conduct

General Professional Conduct
- Be polite, considerate and provide an example of the good conduct that you wish others to follow
- Never use language or behaviour that discriminates on the grounds of gender, race, culture, age, disability, religion or sexuality
- Never engage in any activity that could bring the organisation into disrepute. Girl Effect does not seek to dictate the values by which you conduct your personal life but actions taken outside of working hours that contradict this policy will be considered a violation and will be investigated
- Challenge unacceptable behaviour and report any concerns immediately

Preparation for Visits
- Attempt to understand the local cultural and religious norms, particularly those related to contact between children and adults
- Ensure that you take clothing that is appropriate to the local culture and religion
- Discuss contact with children and young people with local staff in advance to identify and minimise any potential risks

Interactions with Children and Young People
- Always ensure that children and young people know who you are and why you are visiting.
- Always ask permission before taking photographs or videos and ensure that the proper consent for further usage is obtained.
- Always treat children and young people with respect and never act in a way which could shame, humiliate or degrade
- Never show favouritism or spend excessive time with one child or young person. Your presence is temporary & you should avoid developing close emotional ties with any one individual.
- Avoid offering money or gifts to individual children or their family. Where gifts are given, they should only be given to groups of children and should be of minimal value.
- Avoid being alone with children or young people or placing yourself in any situation which could be misinterpreted.
- Never take a child or young person in your car, to your hotel or to any other private spaces
- Never share personal details about yourself (your hotel, home address or contact details) or agree to connect with children or young people on social media

Physical Contact with Children and Young People
- Always wait for the child to initiate any type of physical contact - remember your presence may be unsettling and any attempt to initiate physical contact may be misinterpreted
- Never hit or physically chastise a child or young person (including using physical restraint to contain behaviour)
- Never give assistance in aspects of personal care (e.g. dressing, bathing etc.)
- Never engage in or allow sexually provocative games or behave in a manner which might be considered inappropriate or sexually provocative
- Never sleep in the same room or bed as a child or young person with whom you are working
- Never develop physical/sexual relationships with children, young people or other beneficiaries

Use of Social Media
- Never directly post images or stories about children or young people who are engaged with Girl Effect on your personal social media accounts. Consent is given to Girl Effect as an organisation and not to the individual for personal use.
- Never accept contact requests or engage with children and young people you have met through Girl Effect via personal social media
- Always think twice about what you post/share and what implications this may have for Girl Effect
- Never upload or post any racist, defamatory, obscene, or abusive content
Children’s Participation

*Girl Effect will ensure that safety measures, including risk assessments, are integrated in the design and implementation of all products, research and events in which children and young people are invited to participate.*

Who is this standard for?

- Girl Effect staff and consultants who plan, implement and manage the delivery of any products, research or events in which children and young people are invited to participate.
- Girl Effect staff and consultants who engage children and young people in generating content or collecting data

Drivers Behind the Standard

- **Right to Participation** – The United Nations Convention on the Rights of the Child establishes children’s right to participate and to have their views taken into account in matters that affect them. For the purposes of this standard, participation is understood to be activities or initiatives where Girl Effect invites children or young people to take an active role in the delivery of our initiatives or to share their views, ideas and experiences as part of our work.
- **Duty of Care** – Participation should only be initiated where Girl Effect can demonstrate that it is of benefit to children and young people, where reasonable steps can be taken to mitigate any risk of harm and where those delivering the initiative have the appropriate levels of knowledge, skills and resources to ensure the safety of participants.

This standard is being met when...

**Risk Management**

- Risk assessments are conducted prior to any activities, digital campaigns or other initiatives involving children or young people and result in a Risk Management Plan which addresses all aspects of child safety, including digital safety.
- Where children’s participation takes place within the community, key members of the community are informed and are available to provide support.
- When publishing content on sensitive topics, details of organisations who can provide support, advice and services will be provided to ensure children can access any additional help that they need. Girl Effect will liaise with diverse stakeholders to ensure that recommended services have been vetted and are child-friendly

**Children and Young People**

- Children and young people are provided with information in advance which explains the initiative and the role they are being asked to fulfil. They are given time to consider the request and it is made clear that their participation is voluntary.
- Where children or young people agree to participate, a written agreement is produced outlining Girl Effect’s expectations of them, the support they can expect from us and the extent/limit of their ongoing involvement. The agreement is signed by the child/young person and their parent/care-giver, confirming their informed consent to participate in the Girl Effect initiative.
- Separate consent is obtained for the use of any information provided by children and young people. No photographs, videos or digital images of a child are taken or published without explicit, signed consent for their specific use.

- Where children and young people participate on-line through sharing their own information, ideas, photos or stories, **child friendly terms and conditions are displayed outlining Girl Effect’s expectations of behaviour online, how Girl Effect will use their data and content, and the manner in which their privacy and security will be maintained.**

- **Children and young people are provided with training and information to support their participation and to build their self-esteem and confidence.** Information is presented in child friendly formats which takes into account different levels of literacy and understanding.

- **Children and young people involved in Girl Effect initiatives receive a briefing on safety measures.** This includes advice on how to keep themselves safe and where to go for help. They are provided with a child friendly version of reporting procedures specific to each initiative.

- In digital spaces, children and young people are provided with information and guidance about staying safe on-line and all interaction is moderate to detect any potential risks or harm.

- **Children and young people do not incur costs as a result of their participation (e.g. travel, materials, food and drink).** All reasonable costs should be covered, in advance, by Girl Effect.

- **Children and young people are given clear feedback on the impact of their involvement, the outcome of any decisions, next steps and the value of their involvement.** Feedback is sought about their satisfaction with the participation process and ways in which it could be improved.

- **Any decision to invite children and young people to attend international events must be taken in their best interests with serious consideration given to both positive and negative impact of their involvement.** Additional safeguarding measures are put in place including a risk assessment, a pre-departure briefing, contact details for 24-hour emergency support and a de-brief upon return home.

**Staff and Consultants**

- Staff and consultants facilitating children’s participation are provided with appropriate training and tools to enable them to work effectively with children and young people. This includes, as a minimum, training on the safeguarding measures to be implemented throughout the initiative.

- Staff and consultants are provided with guidance on what steps should be taken to prevent or respond to child protection concerns, including contact details for the local Safeguarding Officer within Girl Effect.

**Tools for Implementation:**

- Participation Agreements / Consent Form for Participation in Girl Effect Activities
- Risk Assessment and Management Plan Format
- Staying Safe – Briefing for Children and Young People PPT Deck
- Girl Effect’s Research Ethics Toolkit
- Guidance on Ethical Research with Children and Young People
- Child Friendly Terms & Conditions (T&Cs) Template
Safe marketing and communications

*Girl Effect will take every precaution to preserve the privacy and dignity of children and ensure they are not exposed to risk as a result of their involvement in Girl Effect’s publicity activities, communication materials or campaigns.*

**Who is this standard for?**
- Girl Effect staff, consultants and others producing content and media for Girl Effect
- Girl Effect staff, consultants and others facilitating activities with children
- Visitors to Girl Effect products

**Drivers Behind this Standard**
- **Best interest of the child** - The public use of images and stories of children and young people inevitably poses potential risks. Where there is a risk of potential negative consequences for children and young people, Girl Effect will make decisions which favour children’s safety and protection.
- **Dignity** - In all communications, Girl Effect will seek to uphold the rights and dignity of the child or young person, their family and the wider community. We will not use language and images that stereotype, degrade, victimise or shame children and young people.
- **Privacy** – Girl Effect upholds every child’s right to privacy. Information shared will be kept to the minimal necessary to achieve wider goals and we will never share information that could put a child or young person at risk.
- **Accuracy** - The organisation’s portrayal of individuals or groups must not be manipulated or sensationalised in any way, but instead should provide a balanced depiction of their life and circumstances. Girl Effect will avoid taking or using pictures or stories out of context. After 4 years, photos and case studies will be archived, to maintain an accurate portrayal of our work.

**This standard is being met when...**

**Content**
- **The maximum information given about a child/young person** should be their first name and the name of the district in which they live. Information or images that could be used to identify the child’s specific location (such as village or community names, school, parish, etc.) should not be used.
- **When producing case studies**, it may be important to disclose the child/young person’s full name and other details to maintain the full impact of the story. In these circumstances, **the case study is revised by the Safeguarding Officer** to assess potential risks prior to publication. If publication puts the child at risk of harm and it is not possible to mitigate these risks, the story will not be published.
- **Where children or young people are survivors of violence or human rights violations**, their faces are not displayed and no information is shared which could lead to their identification. Content will clearly stipulate ‘the names and locations have been changed for protection and privacy purposes’.
- **All content, publications and presentations featuring children or young people** are reviewed to ensure no child is put at risk. Content is reviewed by staff with appropriate levels of
knowledge and experience in relation to safeguarding. Where doubts exists, content decisions should be discussed with the Safeguarding Officer or Global Lead for Safeguarding.

- Images will not be used that could be considered sexually provocative or where children and young people are not fully clothed.

Consent
- Informed consent for photographs, video, audio or personal information is obtained from the child and, where the child is under 18, from their parent/caregiver. Consent may be obtained through a signature on a consent form, video/audio recorded consent or through digital confirmation of consent. In all circumstances, consent must demonstrate that the child/young person understands:
  - How their photo/information will be used and for how long, and by whom
  - Who will see it
  - How their privacy will be upheld
  - That their consent is voluntary and they have the right to decline

- Consent for use of images or stories is distinct from other forms of consent (e.g. consent to participate in activities, research). Specific consent forms must be used. Consent for other purposes cannot be considered as consent for media and communications.

- Pictures taken for personal use may not be shared on personal social media or in any publications or presentations. Consent is provided to Girl Effect and not to any individual

- Individuals or organisations that request the use of Girl Effect’s creative assets, such as photographs, will be required to sign a lending agreement with Girl Effect as to the proper use of such materials. Lending will be limited to Girl Effect partners.

- Consent documentation is stored alongside the data, stories, photos or other digital assets. Images and stories are held securely and access restricted to the minimum number of people who necessary.

- Consent is provided for use of images and stories over a 4 year period after which the images/stories are archived or destroyed, depending on the agreement at the time of consent.

Children’s Voice
- Children and young people are enabled to give their own accounts and personal narratives, rather than have people speak on their behalf. When using content created by children and young people, Girl Effect shares media ownership with them as long as it does not place them at risk.

- Child Friendly Community Guidelines are displayed on Girl Effect’s digital platforms of products where users are commenting or sharing their own information, ideas, photos and stories. These include guidance on sharing personal information and preventing risks of harm.

- Online discussions are moderated to maximise safety and privacy and minimise risks

Tools for Implementation:
- Consent forms for media and communications
- Scripts for obtaining consent through video, audio or online
- Girl Effect Photo/Resource Release and Lending Form
- Guidelines on obtaining consent & publishing images of children
Digital privacy, security and safety

*Girl Effect will ensure that its digital applications, platforms and services are safe, secure and do not result in inappropriate or unethical capture and/or use of data on children and young people.*

Who is this standard for?

- Girl Effect staff, partners, consultants and contractors responsible for developing or managing digital applications, platforms or services
- Girl Effect staff, partners, consultants and contractors who collect, use, analyse or otherwise have access to digital data or content belonging to, or about children or young people.

Drivers Behind this Standard

- ‘Do No Harm’ - Data collected about or from children will be used in ways that respect their privacy and minimizes the risk of harm. Girl Effect will consider the most vulnerable girls as the baseline for determining privacy, safety and security policies and practices. In cases where the risk to the user is unclear, Girl Effect will err on the side of risk prevention and mitigation.

- Data Minimisation - Only data that is directly relevant and necessary to accomplish Girl Effect’s stated purposes will be collected from children and young people.

- Privacy by Design - ensuring privacy is our default setting when designing digital applications, services or platforms.

This standard is being met when...

Security and Safety

- **A risk assessment is completed prior to launching** any product that has a digital component. Where high risks are identified, activities do not proceed until a risk mitigation strategy is developed that reduces the risk to a medium or low level. The risk assessment is approved by the Director leading the initiative.

- Child friendly Terms and Conditions (T&Cs) exist for all Girl Effect digital applications, services or platforms. Acceptance is captured in such a way that it is not the default position.

- Child Friendly Community Guidelines are displayed for users of Girl Effect digital platforms and products. These explain expectations regarding posting or commenting on the site and establish consequences for misuse.

- All website and platforms where children and young people are commenting or sharing information, photos and stories are moderated by staff with appropriate levels of knowledge and experience in relation to safeguarding. Site moderators address inappropriate content in line with the Child Friendly Community Guidelines. Where concerns of harm or abuse are identified, the Girl Effect reporting procedures are followed.

- **Procedures for reporting and responding to harm or abuse exist for each digital platform or product.** These take in to account local laws, cultural norms and the availability of protection services.
Ethical access to and use of children and young people’s data.

- A mapping is conducted and summarises the national and global laws, guidelines and regulations that govern data collection, data privacy, security and transmission. When Girl Effect’s own policies are stronger and more favourable to children and young people, Girl Effect’s policies will be upheld in addition to national and global laws and regulations.

- The summary of legislation and regulations is reviewed annually or whenever there are major changes to regulations or to Girl Effect processes or technology. It is the responsibility of the Director responsible for the initiative to ensure that Girl Effect is aware and complies with data laws.

- Users of digital platforms must be given the opportunity to agree to a specified use of their personal information and this is not assumed based on consent for other activities (e.g. participation, media consent). Active consent must be captured in a way so that consent is not the default option. Consent documentation is stored alongside the data, stories, photos or other digital assets.

Securely collect, use, transmit, manage and store data by ensuring that:

- Digital/electronic information is password protected, and hard copies filed in lockable storage.

- Data is only stored or hosted using cloud-based services that meet the highest industry security standards, including restricted, password protected access and encryption.

- Authorised access is only given to staff that require the data in order to perform their duties. Unauthorised access is considered a breach of the Safeguarding Policy, is investigated immediately and appropriate action taken.

- Children and young people’s data is only transferred by authorised means, e.g. VPN, SSL etc. Data is de-identified or anonymised and encrypted before transmission.

- A written agreement is in place to control and authorise the release of information on children (data, images) to partner organisations, the Internet, the public domain or any third party. The sign-off includes a written assessment of the need/benefit of sharing information and is balanced against potential risks.

- Copyright and ownership issues for digital data, photos, stories and other digital assets are clearly defined and explained both to those collecting data and those providing it during contracting and/or at the point of requesting informed consent.

- Hard copies of confidential and sensitive child data are disposed of or destroyed in a secure manner, e.g. through an appropriate supplier and in line with country legislation.

- Loss of data on children and young people (e.g. lost laptops, pen drives, etc.) is immediately reported to the local Safeguarding Officer and the Global Lead for Safeguarding

Tools for Implementation:

- Digital Privacy, Security, Safety Principles & Guidelines
- Digital Risk Assessment & Checklist
- Child friendly Terms and Conditions (T&Cs)
- Digital Mapping Tool: national and global laws, guidelines and regulations
  - Data Sharing Agreement
  - Scripts & process guide for obtaining consent online
Reporting and response procedures

*Girl Effect will ensure that all child protection concerns are reported through a clear reporting structure and responded to in a timely fashion in a way that safeguards the best interests of children and young people.*

Who is this standard for?
- All Girl Effect staff, consultants, partners and visitors.

Drivers Behind this Standard
- **Mandatory Internal Reporting** - It is the responsibility of all staff and partners to take seriously any concerns, complaints, allegations, suspicions and incidents involving children and young people. Reporting these concerns to the designated Safeguarding Officer is a mandatory requirement in Girl Effect. Failure to report will be considered a serious breach of Girl Effect’s Safeguarding Policy.

- **Equal right to protection** – Mandatory reporting relates to harm caused to any child or young person regardless of their relationship with Girl Effect and irrespective of age, religion, gender, race or socio-economic status. Concerns about harm or abuse must be internally reported where:
  - The alleged perpetrator is a Girl Effect staff, visitor, associate or a member of staff of a partner organisation
  - The alleged perpetrator is a member of the child’s family, community or is unknown to the child
  - The alleged perpetrator is also a child, although responses should take into account the protection and safety of both the child victim and the alleged child abuser
  - The abuse is historical. Most abuse is not disclosed until many years after it has occurred but the risks of harm to children may persist and require investigation
  - The report is anonymous as this does not automatically mean that it bears less substance but may indicate fear of reprisal, shame or other barriers to disclosure. Anonymous reports should be taken seriously as ‘named’ reports although the extent to which they can be investigated may be limited by the anonymity.

- **Duty of Care** – Girl Effect has a legal and moral obligation to respond to cases of harm and abuse when these are identified through our engagement with children and young people. We must not, however, initiate interventions or offer advice that requires specialist child protection expertise as this is outside our area of competence and could inadvertently result in further harm to the child. When cases of abuse are identified, Girl Effect’s duty of care encompasses:
  - Listening and providing reassurance to the child
  - Helping the child to share their concerns with a trusted adult who can help them decide what further action to take (e.g. parent/carer-giver)
  - Providing details of recognised, child-friendly agencies who can provide protection (e.g. police) or additional advice and support (e.g. recognised telephone helpline, a local child protection agency)
  - Ensuring concerns relating to Girl Effect staff, consultants, partners or visitors are fully investigated and action taken

- **Organisational Responsibility** – the responsibility for decisions and actions rests with Girl Effect as an organisation and not with any individual. Staff and any other representatives of Girl Effect must not act in isolation but must consult with Girl Effect’s designated
Safeguarding Officer or the Global Lead for Safeguarding before taking any action in response to child protection concerns.

You will know when you are meeting this standard when:

- A mapping of the local child protection context is undertaken prior to entering a new GEO and is updated annually. The mapping is signed off by the Country Director and the Global Lead for Safeguarding.

- Within each GEO, the mapping identifies, as a minimum:
  - An emergency number that children and young people can contact if they are at immediate risk of harm.
  - An agency that children and young people can contact to discuss safety concerns and seek advice about next steps (e.g. a recognised and approved telephone helpline service)
  - A child protection agency that can assess cases and provide follow up support and advice to children and their families

- Each Girl Effect country office, product and initiative has a documented reporting procedure which takes into account local laws and the mapping of the local child protection context. All staff, consultants & partners understand and are able explain the procedure

- Children and young people are provided with information about who they contact when they have any concerns or they feel unsafe. This includes child friendly information on the limits of confidentiality and the duty to report

- Details of concerns are treated with the highest degree of confidentiality and only shared with the minimum number of people necessary to ensure the safety of the child. Access to records are limited to the Safeguarding Officer, Country Director and Global Lead for Safeguarding. Access by other individuals requires permission from the Safeguarding Officer.

- A central register of all child protection incidents is maintained. The data is anonymized but is analysed regularly by the Global Lead for Safeguarding and the Global Safeguarding Task Force to evaluate the effectiveness of response, identify gaps in resources and knowledge and develop methods to improve practice
You observe or receive a report of harm/abuse to a child

Listen & confirm facts

Where possible, speak to child & confirm what they want to happen

Key Decisions Taken:
- How to ensure the child’s safety
- Whether to report to police / authorities
- Who to inform from child’s support network

Report the concern to Girl Effect’s Safeguarding Officer (SO)

Additional steps when the allegation refers to Girl Effect staff, partners or other representatives

Inform the Country Director & Global Lead for Safeguarding

Inform the COO, Director-People & Nominated Trustee

Nominated Trustee informs the Charity Commission

For UK nationals or UK residents

LADO informed in UK Children’s Services

Cause for Concern form is completed by the person receiving the report & shared with the Safeguarding Officer

Safeguarding Officer maintains a record of all subsequent actions

Will the case be investigated by local authorities / police?

Girl Effects cooperates with investigation

Internal Investigation conducted

Country Director contacts individual who may be suspended pending investigation

Within 24 hrs

Within 48 hrs

Within 24 hrs

On-going

Within 24 hrs
Reporting & Response Procedure

- Listen carefully and calmly to the allegations and ask questions to clarify the allegation. Confirm what steps (if any) have already been taken to ensure the safety of the child/young person. Remember, your role is to clarify facts NOT to conduct an investigation.

- Where the report comes directly from a child or young person, ask them what they feel would help keep them safe, what they would like to happen next and try to identify a trusted adult in their lives who can be contacted to support them and help to keep them safe.

- NEVER promise to keep secrets. Internal reporting is mandatory within Girl Effect and the concern may have to be reported to other agencies as well. You can tell the child that you will only tell people who need to know in order to keep them safe and that you will discuss with them the best way to share information (e.g. who they would like to be told, whether they want to tell the person themselves etc.).

- Before taking any further action, you must immediately contact the Girl Effect Safeguarding Officer or, if unavailable, the Global Lead for Safeguarding or Country Director to discuss next steps.

- In deciding how to respond, the following questions need to be considered:
  - How can the immediate safety and well-being of the child be ensured? Who is best placed to provide protection?
  - Is a criminal act suspected? Does this need to be reported to the police or other authorities?
  - Who else needs to be informed to support & protect the child (e.g. parent/ caregiver, other trusted adult)?

For further information, please refer the ‘Guidance on Managing Disclosures and Making Best Interest Decisions’

- It is important to remember that Girl Effect is not a child protection agency and cannot provide the support and services a child may need following an incident of abuse. In collaboration with the child, it is important to identify a safe and trusted adult from within the child’s family or wider support network who can provide support.

- Decisions about referrals to wider agencies (e.g. for counselling, psycho-social support) should be led by the child and the trusted adult they identify, not Girl Effect. Girl Effect will, however, provide details of support services that have been vetted as child-friendly by either Girl Effect, our consultants, partners or a recognized child protection agencies (e.g. UNICEF, Save the Children).

Reports made through media or digital channels

- If it is not possible to discuss the allegation with the person concerned, providing specific advice without sufficient understanding of the child’s individual situation may place the child at additional risk.

- Responses should be limited to:
  - Acknowledging the child for taking an important step towards disclosing harm or abuse (Voice)
  - Re-affirming the child’s right to protection (Value)
  - Encouraging the child to share their concerns with a trusted adult (Connection)
- Providing details of support services that have been vetted as child-friendly by either Girl Effect, our consultants, partners or recognized child protection agencies (e.g. UNICEF, Save the Children) (Connection)

- Even where a report of abuse is made through media or digital channels and it is possible to communicate with the person concerned (e.g. IVR), advice should only be given by suitably qualified and experienced safeguarding specialist. If the person receiving the report is not a specialist, they should provide the generic safeguarding response detailed above.

- All concerns and response provided should be recorded and the Safeguarding Officer notified within 24 hours.

**Allegations Against Staff**

- If the alleged perpetrator is a member of Girl Effect staff, a consultant, visitor or a representative of a partner organisation the Country Director must be informed in addition to the Safeguarding Officer.

- The Country Director must inform both the Chief Operating Officer and the Director, People to seek advice regarding next steps and to decide whether the individual should be suspended from duties pending an investigation. Suspension is not a presumption of guilt but is to protect both the individual and anyone associated with the allegation.

- In most cases, the Country Director will contact the individual concerned to provide a brief outline of the allegations (except where this may expose the child to further risk) and give them an opportunity to respond. If the individual is suspended from duties, they will be prohibited from contacting other Girl Effect staff or accessing the Girl Effect drive. The Country Director will act as the main point of contact until the investigation is completed.

- Where the individual is a UK national or UK resident, the matter must also be reported to the Local Authority Designated Officer (LADO) in the area where the individual lives in the UK. This is in addition to any official reporting in-country. The LADO will advise whether Children’s Services or the police will take further action and whether a UK investigation is required. They will also provide advice regarding referrals to the Disclosure & Barring Service (DBS).

- Any allegation of harm or abuse caused by a member of staff, anyone representing Girl Effect or arising as a direct result of Girl Effect operations, must be reported to the Charity Commission in the UK. This report must be submitted irrespective of where the incident took place. This report should be submitted by the Nominated Board Member for Safeguarding or Girl Effect’s Chief Operating Officer

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5 The Charity Commission must be informed of:

- Any incident where the beneficiaries of your charity have been or are being abused or mistreated while under the care of your charity or by someone connected with your charity such as a trustee, member of staff or volunteers
- Any incident where someone has been abused or mistreated and this is connected with the activities of the charity
- Any allegations have been made that such an incident may have happened, regardless of when the alleged abuse or mistreatment took place
- Where there are grounds to suspect that such an incident may have occurred

Investigation

- In most circumstances, Girl Effect will only pursue an investigation in cases relating to staff, partners or other representatives of Girl Effect. Wherever possible, the decision to pursue investigations by perpetrators unconnected to Girl Effect will rest with the child and their family.

- Where allegations against Girl Effect staff, partners or other representatives of Girl Effect are reported to the police or other statutory authorities, these agencies should lead the investigation. Girl Effect will cooperate with any investigation that is undertaken.

- In countries where there is doubt about the integrity and/or competence of statutory authorities and/or reporting may lead to reprisal or re-victimisation for the child or their family, all potential risks should be assessed before any actions are taken. Any decision must take into account the legal obligations as failure to report may, in some countries, constitute a legal offence. Any decision not to report cases to the relevant local authorities must be documented and authorised by the Country Director and the Global Lead for Child Safeguarding.

- In circumstances where the incident is not reported to the police or other statutory authorities or where they decline to investigate the matter, Girl Effect should conduct its own investigation. Any decision to undertake an internal investigation must be made by the Girl Effect Country Director, in discussion with the Global Lead for Safeguarding and the Chief Operating Officer.

- Formal investigations should be undertaken by appropriately trained individuals. This may involve bringing in an external professional to conduct or advise on the investigation. Separate guidance is provided on conducting a formal investigation.

Documentation

- The person receiving the initial report of harm to a child, must complete a Cause for Concern form within 24 hours and share this with the Safeguarding Officer. The information recorded should be as factual and objective as possible and personal opinion should be avoided.

- The form should be signed and dated. This is important as the form could be used in any subsequent criminal investigation or disciplinary proceedings.

- The Safeguarding Officer is responsible for documenting all subsequent actions, communications with external agencies and the outcome of any investigation.

- All documents (soft and hard copies) must be kept confidential. Digital/electronic information must be password protected, and hard copies filed in lockable storage. Data must be encrypted before it is transmitted electronically.

Tools to support implementation:

- Cause for Concern Form
- Example child protection reporting procedures (Digital & In-country)
- Mapping the external/local CP context and resources
- Guidance on Managing Disclosures & Making Best Interest Decisions
- Guidance on Conducting Internal Investigations
- Internal Register of Child Protection Concerns and Responses
Adaptation to the local context

*Girl Effect will ensure that its Global Safeguarding Policy is adapted by Country Offices to reflect the legal, cultural and social context in which they operate*

Who is this standard for?

- Girl Effect Country Office staff & Senior Leadership
- Safeguarding Officers

Drivers Behind the Standard

- Universality – Every child has the right to be protected from all forms of violence, abuse and maltreatment irrespective of their nationality, race, religion or socio-economic status

- Respect for local laws and customs – Girl Effect has operations in diverse contexts and suspected harm to children must be responded to and investigated in the context of local laws and customs. It is a requirement for all Girl Effect Country Offices to localise child protection reporting and referral pathways.

You know you are meeting this standard when...

- A mapping of the local child protection context is undertaken prior to entering a new GEO and is updated annually. The mapping is signed off by the Country Director and the Global Lead for Safeguarding.

- Within each GEO, the mapping identifies, as a minimum:
  - An agency that children and young people can contact to discuss safety concerns and seek advice about next steps (e.g. a recognised and approved telephone helpline service)
  - An emergency number that children and young people can contact if they are at immediate risk of harm.
  - A child protection agency that can assess cases and provide follow up support and advice to children and their families

- Local reporting procedures exist which comply with national laws and take into account the availability of local services. All staff are aware of the procedure and child-friendly versions are available for children and young people engaged with Girl Effect activities.

- A locally specific Code of Conduct has been developed in collaboration with girls and boys. It should reflect their expectations of staff and other representatives of Girl Effect and should be displayed in local offices and safe spaces where staff are interacting with children and young people

- There are local lines of accountability in place, including a Safeguarding Officer for each location.

Tools for implementation:

- Mapping the external/local CP context and resources
What should a CP mapping exercise include?

1. **Overview of the main protection risks:**
   - Prevalence of different forms of harm, including cultural practices that may be harmful (e.g. FGM, child labour)
   - Local attitudes towards child abuse and protection (e.g. possible reprisals towards survivors, etc.).

2. **Statutory child protection:**
   - Summary of legislation governing protection, including regulations for online protection.
   - Structure and responsibilities of Government agencies with statutory authority for the protection, including a brief assessment of the effectiveness of these services.

3. **Criminal Investigation/prosecution, police and judiciary:**
   - Brief analysis of enforcement, including likely response, any associated costs and any risks associated with engaging police/judiciary
   - Location and contact details of police and judicial services, including details of gender desk where available.

4. **Non-Statutory Service Provision**
   - Details of health and other services provided by NGOs and other service providers, including referral criteria, costs and a brief assessment of service quality where known

5. **Community:**
   - Details of informal and community-based protection mechanisms and how these function and brief assessment of their effectiveness.
   - Key community figures who can be contacted to provide support for protection within the community.