Girl Effect
Global
Safeguarding
Policy
July 2020
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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.

Girl Effect’s Safeguarding Policy is based on the “three-P’s”:

- **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 abuse\(^1\); physical, emotional or psychological, neglect, sexual, financial or material, discriminatory, exploitation or harmful traditional practices, that results in actual or potential harm physically and/or digitally. This includes harm which is caused intentionally or unintentionally, directly or indirectly, on or offline.

Driven by Girl Effect’s Principles (these principles reflect the behaviour we expect from staff)

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.

Collaborative

Every child and young person has the right to protection and to a life free from violence and maltreatment, without discrimination. Upholding this right is everyone’s responsibility and requires collaboration across boundaries to solve problems and address risk.

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, Ambassadors, Journalists, cast members and consultants; and
- 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. We expect all partners to uphold the principles and adhere to the standards included in this policy. For more detail, see "Safe Partnerships."

Girl Effect operates a zero-tolerance approach to any form of harm caused by GE staff, operations or partners. This includes, but is not limited to, bullying, harassment, sexual misconduct and exploitation. We uphold a total commitment to safeguarding to ensure the safety and protection of the children and young people we work with. We treat all incidents seriously, and any concerns will be treated respectfully, confidentially, and swiftly acted on. All suspected policy breaches are investigated. 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 ten interlinked and mutually reinforcing standards which aim to ensure that Girl Effect is a child and youth-safe organisation. No standard can be considered in isolation, and each standard must be given equal weight and importance across the organisation.

**Our Standards**

1 Accountability  
2 Building Know-How  
3 Safe Recruitment  
4 Safe Partnerships  
5 Code of conduct  

6 Children & Young People’s Participation  
7 Safe Marketing & Communications  
8 Digital Privacy & Security  
9 Reporting & Response Procedures  
10 Adaptation to the Local Context

Tools have been developed to support the implementation of each standard and are available in the Safeguarding folder on the shared drive. Advice on implementation can also be sought from the Global Safeguarding Team or local Safeguarding Focal Points.
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 Conventions 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 children and 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, bullying, harassment, discrimination, financial or material, organisational, harmful traditional practices) whether these reach the threshold of significant harm or not and whether they occur on or offline.

Safeguarding - Safeguarding means promoting and protecting people’s health, well-being and human rights, and enabling them to live free from harm, exploitation and abuse. Safeguarding in practice means identifying and minimising the risk of harm, exploitation and abuse to children and young people from staff, representatives, partners, operations, programme activities and includes responding appropriately to any safeguarding concerns about children and young people within communities where we work. It includes a reporting and response system which allows Girl Effect to provide a swift and sufficient response when harm and abuse do occur.

Digital Safeguarding - Ensures Girl Effect’s digital products are designed and operated in a way that safeguards and protects children and young people from harm and abuse. The approach includes safe platform design, content, moderation and thoughtful signposting of children and young people to support services. This also includes promoting child/youth friendly content and information about digital privacy, security, safety and safeguarding any personal/sensitive data.

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, email address, phone number, and posts on social media or responses to surveys. Data can be numerical, descriptive or visual.
Standard 1: 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 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 and young people is both an organisational 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.

- No Place to Hide – Abuse thrives on secrecy and abusers seek out organisations with weak safeguarding 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.

- Whistleblowing – Girl Effect believes in supporting staff to come forward, in confidence and without fear of reprisal to report any concerns they may have about the behaviour of another employee or operations that may put individuals at risk of harm. Girl Effect’s Whistleblowing procedures include access to an external service provided by NAVEX Global. Girl Effect’s Whistleblowing procedures are detailed in our Speak Up Policy.

This standard is being met when...
- There is a Designated Board Member for Safeguarding within the Global Board and within all the relevant governing bodies in-country.
- Safeguarding is a standing agenda item at all Board meetings.
- There are dedicated Safeguarding Managers in every country, supported by the Global Safeguarding Team.
- 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 Champions Group exists to promote learning and improve practice.
- 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.
- Gaps in safeguarding are addressed through an appropriately resourced action plan.
- An independent evaluation of safeguarding procedures is commissioned every three years.

2 Speak Up: https://docs.google.com/document/d/1ptqEssgIPTm-ab0-0fMVdp3r_jxUHiM-NMKDjogfCg/edit
Roles & Responsibilities

Safeguarding is everyone’s responsibility, however, certain individuals have specific duties:

Designated Board Member for Safeguarding
- Act as a point of contact within the Board for any issues relating to safeguarding.
- Support Senior Leadership in managing safeguarding concerns/investigations which may affect the reputation and standing of the organisation.
- 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.

Board of Trustees
- Accountable for global safeguarding policy and procedure adherence.
- Will receive updates at Board meetings on:
  - Safeguarding staffing updates;
  - Policy updates (implementing standards, training etc.); and
  - Reducing organisational risk.
- The Board of Trustees will be notified within 48 hours when reports are filed with Charity Commission.

Chief Executive Officer (CEO)
- Accountable for global safeguarding policy and procedure adherence.
- The CEO will:
  - Receive monthly reports on open and closed cases with a high level of detail of types of concerns reported from the Executive Team;
  - Be notified immediately of allegations made against a member of Girl Effect’s staff, consultant, visitor or partner; and
  - Be notified immediately when a concern is regarding a breach of GE’s Code of Conduct.

Executive Team
- Responsible for promoting a strong safeguarding culture within Girl Effect.
- Will receive monthly headline update on open and closed cases by geography with high-level detail of types of concerns.

Senior Director, Impact
- In partnership with legal counsel, decide when disclosures get reported to the Charity Commission and inform Board member responsible for safeguarding.
- Will have consistent access to the global tracker for all cause for concerns.
- Accountable for ensuring monthly updates are provided to the Executive Team.

Country Director; Product leads for non-GE country activities; and Functional Global Heads (for relevance cases)
- Accountable for ensuring timely and effective case reporting and management.
- Accountable for safeguarding policy and procedure adherence at national or product level.
- Responsible for updating Global Directors on any safeguarding matter in-country, as required.

Global Safeguarding team
- Responsible for managing global tracker for all cause for concerns, active and closed cases.
- Formally and immediately escalate cause for concerns to Senior Director, Impact when:
  - There is an immediate risk of harm to a child/young person;
  - There is an allegation made against a member of GE staff/visitor/consultant/partner; and/or
  - The concern is regarding a breach of GE’s Code of Conduct
- Produces a monthly analysis of global safeguarding register for the Executive Team.
- Responsible for global safeguarding policy and procedure adherence.

Safeguarding Managers in-country/Product Safeguarding Focal Points for with no GE local office
- Submit cause for concerns and lead case management.
- Responsible for ensuring safeguarding policy and procedure adherence at national or product level.
Tools for Implementation:
- Safeguarding Self-Assessment Framework;
- Terms of Reference: Global Safeguarding Champions Group;
- Job Description and Person Specifications; and
- Serious Incidences to Report to the Charity Commission.\(^3\)
Standard 2: Building Know-How

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?
- All Girl Effect Staff, in particular, People Team, Executive Team, Safeguarding Managers;
- All consultants, partners and others undertaking work on behalf of Girl Effect (e.g. Ambassadors, Journalists, Cast Members); and
- All visitors to Girl Effect products and offices.

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 Managers and Focal Points. The Executive Team 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 organisation 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 included in all employment contracts.
- All staff receive an induction on safeguarding within the six weeks of work, or sooner if their role requires contact with children and young people.
- Capacity building on safeguarding is provided across the organisation on an annual basis, including annual refresher training on the safeguarding policy.
- Staff with specific responsibilities for safeguarding receive regular specialist capacity building and have access to the resources and tools necessary to execute their responsibilities.

Partners
- All partners will go through Girl Effects due diligence process.
- All partners delivering services with children and young people must complete a safeguarding agreement which ensures:
  - compliance with Girl Effects safeguarding policy (including developing and sharing of risk assessments and risk management plans);
  - the provision of safeguarding training for all staff;
identifying and training a safeguarding focal point; and

- a commitment to ensure all staff understand and comply with Girl Effects Code of Conduct.

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 Girl Effect’s Safeguarding Agreement for Visitors, Partners & Consultants (includes Code of Conduct & signature page) 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 Focal Point.

- Visitors are accompanied by Girl Effect staff whenever in direct contact with children or young people.

Consultants
- Consultants read and sign a copy of Girl Effect Safeguarding Agreement for Visitors, Partners and Consultants (includes Code of Conduct & signature page).

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

- Consultants who will have direct contact with children and young people or who will be working with Girl Effect for a period of longer than 3-months will participate in mandatory Safeguarding training.

- 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 & Partners) PPT Deck

- Girl Effect Safeguarding Agreement for Visitors, Partners & Consultants (includes Code of Conduct & signature page)

- Due Diligence Guidance

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4 Due Diligence Guidance: https://docs.google.com/document/d/1g0YPV1tAh_VHG_c6PEmDnE35bxsWFRDpP8mg_VWsrs6Q/edit?ts=5c517a53
Standard 3: Safe Recruitment

Girl Effect will ensure that its recruitment processes minimise 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 Executive Team; and
- All 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 recognises 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 categorised as requiring either Foundation or Enhanced level police 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; and
  - 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 corresponds to the categorisation for the post-holder. Where specific checks have not been obtained, there is a documented rationale with appropriate authorisation from the Chief Operating Officer.
- Two 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 three years.
- In countries where police checks are not available or are known to be unreliable, the People Team will gain three references, with a minimum of one of these references being a verbal reference.
- All reference request forms will include a question around the candidate's suitability to work with children and young people.

Consultants
- For all consultants whose work involves direct or indirect with children and young people:
  
  o A DBS check obtained in the past three 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.

  o Where such checks are not available (e.g. where the associate is not a UK national or a UK resident), Girl Effect will call referees to seek further information about the candidate’s practice in relation to children.

  o All consultants must provide Girl Effect with two independent referees who are verified by telephone or email. Referees cannot be family members and must have known the candidate for longer than three years. References will be verified prior to work commencing.

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<th><strong>Disclosure &amp; Barring Service (Police) Checks</strong></th>
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<td><strong>Foundation Level Checks</strong></td>
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<td><strong>Who?</strong></td>
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<td>All Staff, even where the post is unlikely to involve either direct or indirect contact with children and young people.</td>
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<td><strong>Checks:</strong></td>
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<td>- A candidate specification accompanies each job description to help ensure that only people with the suitable knowledge and skills are recruited for the post.</td>
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<td>- Candidates complete a full application form and must explain gaps in their employment history (informally and ensuring this practice does not discriminate).</td>
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<td>- 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 three years and cannot be family members.</td>
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<td>- 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.</td>
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| **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. |
| **Checks:** |
| In addition to the Foundation Level Checks: |
| - For UK Nationals, a Disclosure and Barring Service (DBS) check is completed. DBS checks are renewed every three years. |
| - DBS checks may only be completed for UK Nationals and UK residents. Alternative checks will be included in the localised procedures developed by Girl Effect country offices. |
| - Where such checks are not available, Girl Effect will attain three reference checks and will call at least one of the referees to seek further information in relation to the candidate’s practice in relation to work with children and young people. |
| - 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. Executive Team Members) have job specific safeguarding responsibilities, the interview process will include 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;
- Speak Up (Whistleblowing) Policy;
- Dignity and Diversity Policy; and
- DBS Code of Practice.\(^5\)
**Standard 4: 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 and/or fundraising of Girl Effect products, research and events.
- All staff who work with organisations that are responsible for the delivery of our work (implementing partners). This encompasses all partners and suppliers working with Girl Effect, who may or may not be directly working with girls and/or have access to their data.
- All staff from partner organisations who regularly work with children and young people or have access to their data and staff from partner organisations who may visit Girl Effect’s offices, brands or products.

**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 conduct. This responsibility is led by the Girl Effect staff member leading the relationship with the partner or supplier and is coordinated with the Safeguarding Team, Finance Team, Operations Team and Legal Counsel.

**Types of Due Diligence Checks**
All partners require at least a basic level of due diligence checks. This may include funders, in-kind and other non-monetary partners, local implementing partners and suppliers. The Girl Effect staff member leading the relationship with the partner or supplier (in consultation with the Safeguarding Team, Finance Team, Operations Team and Legal Counsel where necessary) will determine whether a partner requires basic or enhanced due diligence checks.

- **Basic due diligence checks:** required for partners who are identified as potentially low-risk. This may include partners who have no direct or indirect contact with children and young people, have no access to children and young people’s data or personally identifiable information and/or have a low financial commitment – e.g. a printing company.
- **Enhanced due diligence checks:** required for partners who are identified as potentially high-risk. This may include partners who have direct or indirect contact with children and young people, have access to children and young people’s data or personally identifiable information and/or a high level of financial commitment – e.g. partner organisation committed to supporting fieldwork with children and young people.
Below are the various due diligence checks that should be completed throughout the lifecycle of a partnership. Levels of the checks required are dependent on whether we were conducting ‘basic due diligence’ or ‘enhanced due diligence.’

Pre-engagement checks: prior to engaging with a partner, a strategic alignment assessment and a risk assessment is completed to identify and assess any ethical implications of partnering with the organisation. 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 a risk is flagged, a risk management plan should be in place for any partners where there may be a risk to children and young people.

Pre-closing checks: prior to prior to confirming any agreement, a series of checks must be completed to ensure the organisation is able to deliver work on behalf of Girl Effect safely and is also not affiliated with any misconduct that is in conflict with Girl Effect’s values. This includes a review of all of, or at least one of, the organisation’s structures that may include safeguarding, data privacy, financial, operational, and governance structures.

Closing checks: whilst confirming the contractual agreement, a number of additional agreements may be required to ensure partners abide by agreed conditions to deliver a safe partnership. This may include a non-disclosure agreement, safeguarding agreement, and data privacy agreement.

Ongoing checks: when a partnership is active, a number of checks are in place to ensure partners have not recently engaged in activities that put children and young people at risk or is in conflict with Girl Effect’s values and that they continue to maintain and uphold the dignity and privacy of children and young people. This may include an annual risk assessment, logging and updating risk registers and ensuring appropriate risk management plans are in place, refresher safeguarding training, review of existing agreements and amending those according to changes in the partnership activity.

All partnerships at Girl Effect should follow the Due Diligence Guidance Checklist to ensure the correct level of due diligence checks are completed for the different types of partners Girl Effect engages with.

This standard is being met when:
- All Partners are graded as requiring either Basic or Enhanced Due Diligence Checks.
- Prior to confirming any partnership requiring Enhanced Due Diligence, the Executive Team 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.
- Partnerships, where data on children and young people is shared between Girl Effect and the partner, a written Safeguarding Agreement, is developed which covers data privacy and security, data ownership, consent for the use and re-use of data, sharing and destruction of data as part of the due diligence process.
- Where a representative of any partner organisation visits Girl Effect products, they are provided with a briefing which includes expectations in regard to safeguarding.
- All visitors sign a 'Girl Effect Safeguarding Agreement for Visitors, Partners and Consultants 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 necessary, Girl Effect provides additional capacity building to ensure the safe practice of partners.

- There is a clear process in place for handling situations where partners contravene the Safeguarding Agreement.

Tools for Implementation:
- Due Diligence Guidance;

- Safeguarding Agreement Template; and

Standard 5: Code of Conduct

Girl Effect will ensure that all staff, visitors and other 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 Girl Effect Partners;
- All consultants and others undertaking work on behalf of Girl Effect; and
- All visitors to Girl Effect products.

Drivers Behind the Standard
- 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 and addressed accordingly. Girl Effects Speak Up policy ensures there will be no reprisals against those that report.
- 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.

This standard is being met when...
- All staff, consultants and volunteers have read and signed a ‘Girl Effect Safeguarding Agreement for Visitors, Partners and consultants’ which includes the Code of Conduct, they know the standards expected of them and how to report a safeguarding concern.
- All partners working directly with children sign a Girl Effect Safeguarding Agreement for Visitors, Partners and Consultants which includes the Code of Conduct, they know the standards expected of them and how to report a safeguarding concern.
- 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 and young people are engaged in activities.
- Children, young people 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 behaviour when posting on the site and consequences for any violation.

Tools for Implementation:
- Girl Effect Safeguarding Agreement for Visitors, Partners & Consultants (includes Code of Conduct & signature page); and
- Girl Effects Modernizing Safeguarding Guidance.
Code of Conduct

General Professional Conduct
- Be polite, considerate and provide an example of the good conduct 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 than 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 and 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 young people 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 and young people on social media.

Physical Contact with Children and Young People
- Never 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 children or young people (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 children and young people with whom you are working.
- Never develop physical or 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 or young people you have met through Girl Effect via personal social media.
Standard 6: Children and Young People’s Participation

Girl Effect will ensure that safety measures, including risk assessments, are integrated into 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 activities, 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 in to 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.
- Community Engagement – When Girl Effect interfaces with communities, it is important that those communities are aware of the standards of behaviour they can expect and that they know how to report any safeguarding concerns.

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 and youth safety, including digital safety.
- 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 and our partners 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/caregiver, confirming their informed consent to participate in the Girl Effect initiative.

- Children, young people and community members (including parents and caregivers) are informed of what a safeguarding concern is and how to report it.

- 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 or young person are taken or published without explicit, signed consent for their specific use.

- Where children and young people participate online 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 take into account different levels of literacy and understanding. This includes a briefing on safety measures – e.g. 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 online, and all interaction is monitored 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 will be covered 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 the 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 debriefing upon return home.

Staff and Consultants

- Staff and consultants facilitating children or young people’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 Manager within Girl Effect.
Tools for Implementation:
- Template Consent Forms for different activities;
- Risk Assessment Template;
- Staying Safe – Briefing for Children and Young People PPT Deck;
- Girl Effect’s Research Ethics Toolkit;
- Girl Effect, Digital Safeguarding - Modernising Policy and Practice; and
- Youth Friendly Fact Sheets; ‘Stay Safe, Stay Connected’: Bangladesh, Ethiopia, Malawi, Nigeria, Rwanda & Tanzania.
Standard 7: 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, partners, consultants and others producing content and media for Girl Effect;
- Girl Effect staff, partners, consultants and others facilitating activities with children; and
- Visitors to Girl Effect products and activities.

Drivers Behind this Standard
- The 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 minimum 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 four years, photos and case studies will be destroyed or archived (with updated consent), 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 is important to safeguard the identity and location of children and young people. To maintain the full impact of the story but to safeguard the child or young person, it is important to change the child/young person’s name and other details. In these circumstances, the case study is reviewed by the Safeguarding Manager or Focal Point 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 portrayed as vulnerable, 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 exist, content decisions should be discussed with the Safeguarding Focal Point and escalated Global Safeguarding Team where appropriate.

- 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 both the child and their parent/caretaker. Consent may be obtained through a signature on a consent form, video/audio recorded consent or through the digital confirmation of consent. In all circumstances, consent must demonstrate that the child/young person understands:
  
  o How their photo/information will be used and for how long, and by whom;
  
  o Who will see it;
  
  o How their privacy will be upheld;
  
  o That their consent is voluntary; and
  
  o That they have the right to decline or withdraw consent at any time before publication. After publication, we may remove the photograph, video or audio from our own platforms, but we cannot control where or who may have saved these externally.

- Consent for the 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 or official 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.

- Image and stories are held securely, and access restricted to the minimum number of people who necessary.

- Consent is provided for the 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 and young people’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 templates for media and communications;
- Scripts for obtaining consent through video, audio or online;
- Girl Effect, Digital Safeguarding - Modernising Policy and Practice; and
- Moderation Guide and Training PPT.
Standard 8: 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 minimises 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.
- Digital education and literacy are an integral part of Girl Effects training with children and young people.
- 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 summaries 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 is 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 and after a period of 4-years.
- Loss of data on children and young people (e.g. lost laptops, pen drives, etc.) is immediately reported to the local Safeguarding Focal Point and the Global Safeguarding Team.
Tools for Implementation:
- Digital Risk Assessment & Checklist;
- Child-friendly Terms and Conditions (T&Cs);
- Digital Mapping Tool: national and global laws, guidelines and regulations;
- Scripts & process guide for obtaining consent online; and
- Girl Effect, Digital Safeguarding - Modernising Policy and Practice.
Standard 9: 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 Focal Point is a mandatory requirement in Girl Effect. Failure to report will be considered a serious breach of Girl Effect’s Safeguarding Policy and appropriate action will be taken.

- Equal right to protection – protection from harm and abuse is every child and young person’s right. Girl Effect requires mandatory reporting of harm caused to any child or young person regardless of their relationship with Girl Effect and irrespective of age, religion, gender, race or socioeconomic status.

- Ensuring health and well-being – Girl Effect takes its role seriously to ensure all those affected by harm and abuse are supported in accessing relevant and appropriate care and support services (e.g. medical, psychosocial, and legal). Concerns about harm or abuse must be internally reported where:
  o The subject of the complaint is a Girl Effect staff, visitor, associate or a member of staff of a partner organisation.
  o The subject of the complaint is a member of the child/young person’s family, community or is unknown to the child/young person.
  o The subject of the complaint is also a child or young person, although responses should take into account the protection and safety of both the child/youth victim and the child/youth subject of the complaint.
  o The abuse is historical. Most abuse is not disclosed until many years after it has occurred, but the risks of harm to children and young people may persist and require investigation.
  o 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:
  o Ensuring that the child or young person is safe and that any response operates in the best interests of the child/young person and is survivor-centred.
  o Listening and providing reassurance to the child or young person.
  o Helping the child or young person to share their concerns with a trusted adult who can help them decide what further action to take (e.g. parent/caregiver).
- Ensure the family or caregiver of the child or young person has the appropriate support.

- Providing details of recognised child/youth-friendly agencies who can provide protection (e.g. the 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 Focal Point or the Global Safeguarding Team 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 and youth 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 Safeguarding Team.

- 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.

  - Appropriate care and support services that will be promoted as a point of referral.

  - Identification of referral services for both child, young person and adult survivors as follows:
    
    - Psychosocial care - general and those with expertise in sexual abuse. A psychologist should also be identified.
    
    - Medical - general medical care, emergency care, and expertise in sexual abuse, including rape.
    
    - Legal - legal aid for the survivor and their family that is relevant and appropriate within their context. Legal expertise in the area of protection, harm and abuse preferred.
    
    - Safe shelter - domestic abuse shelters for women identified.

  - Identification of appropriate police services, for example, victim support centres, in cases where criminal conduct is suspected. Knowledge of local laws and local security risks should be understood in cases where law enforcement is suspected of abuses.

  - If any of the above is not available, then the Girl Effect office should, where possible, find alternatives to fill this gap in service provision.
Each Girl Effect country office, product and initiative have a documented reporting procedure which takes into account local laws and the mapping of the local child protection context. All staff, consultants and partners understand and are able to explain the procedure.

Children and young people are provided with information about whom 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 is limited to the Safeguarding Focal Point, Country Director and Global Safeguarding Team. Access by other individuals requires permission from the Safeguarding Focal Point.

A central register of all child protection incidents is maintained. The data is anonymised but is analysed regularly by the Global Safeguarding Team who will share analysis of concerns reported to the Global Safeguarding Champions Group and the Girl Effect Board on an annual basis to evaluate the effectiveness of the response, identify gaps in resources and knowledge and develop methods to improve practice.

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 Focal Point or, if unavailable, the Global Safeguarding Team or Country Director to discuss next steps.

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

- 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, psychosocial 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 recognised 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/young person’s individual situation may place the child at additional risk.

- Responses should be limited to:
  - Acknowledging the child/young person for taking an important step towards disclosing harm or abuse (Voice).
  - Re-affirming the child/young person’s right to protection (Value).
  - Encouraging the child/young person to share their concerns with a trusted adult (Connection).
  - Providing details of support services that have been vetted as child/youth-friendly by either Girl Effect, our consultants, partners or recognised 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 on a Cause for Concern form and sent to safeguardingconcerns@girleffect.org. The Safeguarding Focal Point must be notified within 24 hours.

Allegations Against Staff
- If the alleged subject of the complaint is a member of Girl Effect staff, a consultant, visitor or a representative of a partner organisation the Country Director (where appointed), Safeguarding Manager in-country, and Global Safeguarding Team must be informed. If there is no dedicated Safeguarding Manager in-country (e.g. where we work through a partner), then the Global Safeguarding Team is the first point of contact.

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

- In most cases, the Global Safeguarding Team, Country Director, Director of People and Culture and Legal Counsel will hold a case management meeting (with 48 hours) to decide next steps and the nature of investigation including who will lead case management and who needs to be involved (to ensure confidentiality and anonymity for the subject of the complaint). The instigation will be formal or informal, based on the evidence reviewed at the Case Management Meeting.

- 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.

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

- Where allegations against Girl Effect staff, consultants, 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/young person or their family, all potential risks should be assessed before any actions are taken. Any decision must take in to 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 Safeguarding Team.

- 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 Safeguarding Team 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 Manager. 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 Focal Point 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.

- Records from safeguarding cases will be kept for a minimum of ten years.

Tools to support implementation:
- Cause for Concern Form (Annex 3);
- Reporting & Response Procedure Flow Chart (Annex 2);
- Example child protection reporting procedures (Digital & In-country);
- Mapping template for Child Protection Mappings;
- Youth Friendly Fact Sheets 'Stay Safe, Stay Connected'; Bangladesh, Ethiopia, Malawi, Nigeria, Rwanda & Tanzania;
- Guidance on Managing Disclosures & Making Best Interest Decisions⁹; and
- Internal Global Register of Child Protection Concerns and Responses.
**Standard 10: 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 Managers; and
- Product Safeguarding Focal Points.

**Drivers Behind the Standard**
- Universality – Every child/young person has the right to be protected from all forms of violence, abuse and maltreatment irrespective of their nationality, race, religion or socioeconomic status.
- Respect for local laws and customs – Girl Effect has operations in diverse contexts and suspected harm to children or young people 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 or when a national emergency is declared. The mapping is signed off by the Country Director and the Global Safeguarding Team.
- Within each GEO, the mapping identifies, as a minimum:
  - A summary of the legal framework;
  - Community attitudes, gender norms, customs and practices which relate to safeguarding;
  - 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; and
  - 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 in to 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 Focal Point for each location.
What should a CP mapping exercise include?

Overview of the main protection risks:
- Prevalence of different forms of harm, including cultural practices that may be harmful (e.g. FGM, child labour) and details of any locations where this is known/believed to be particularly prevalent.
- Local attitudes towards child abuse and protection (e.g. possible reprisals towards survivors).

Statutory child protection:
- Summary of legislation governing protection, including regulations for online protection and brief analysis of the extent of implementation/enforcement of legislation as far as is known etc.
- Structure and responsibilities of Government agencies with statutory authority for the protection, including a brief assessment of the effectiveness of these services.

Criminal Investigation/prosecution, police, and judiciary:
- A brief analysis of enforcement, including mandatory reporting, 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.

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.

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

Tools for implementation:
- Country context mappings;
- Youth Friendly Fact Sheets ‘Stay Safe, Stay Connected’; Bangladesh, Ethiopia, Malawi, Nigeria, Rwanda & Tanzania; and
- National Safeguarding Policies for all GEO’s.
Annex 1: Definitions of Abuse

1. **Physical abuse** is causing injury to a person, however slight. This may involve hitting, shaking, throwing, poisoning, biting, burning or scalding, drowning, suffocating or otherwise causing or attempting to cause physical harm to a person. Physical harm may also be caused through the misuse of medication, restraint or inappropriate sanctions (for example, corporal punishment) or being given alcohol or a substance that is known to cause harm.

2. **Emotional or psychological abuse** is the emotional ill-treatment of a person that adversely affects their well-being or development. Some level of emotional abuse is involved in all types of ill-treatment, though it may occur alone. It includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks. Other harmful experiences, such as frequently being forced to witness violence in their domestic environment, are also classified as emotional abuse.

3. **Neglect** is the continuing failure to prevent harm that damages or impairs health and/or development by not meeting a person’s basic physical and/or psychological needs. This includes ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, withholding medication, inadequate hygiene, nutrition, housing or heating, or preventing someone from interacting with others. Professional judgement is needed to decide whether the experience of neglect is intentional or due to material deprivation and should be based on the severity of the neglect and how the individual is being treated relative to their peers in the community and wider cultural norms.

4. **Sexual abuse** is the involvement of a person in sexual activities which they do not want or truly understand, or to which they are unable to give valid or effective consent. This may involve rape, sexual assault, inappropriate sexual contact or exposure to inappropriate material. Any kind of sexual activity involving a child or young person constitutes sexual abuse, whether or not the child or young person is aware of, or consents to, what is happening. This includes rape, incest, fondling genitals, masturbation, voyeurism, exhibitionism, exposing a child to young person sexual material, or making them take part in any sexual activity, real or simulated, whether face-to-face, online, or in any other medium.

5. **Financial or material abuse** is the theft or misuse of a person’s property or assets. This includes money being withdrawn or stolen, goods or services purchased in someone’s name without their consent, being deliberately overcharged for goods or services, misappropriation of property, possessions or benefits, or money being borrowed by someone who is providing a service to the vulnerable person.

6. **Discriminatory abuse** is repeated, ongoing or widespread discrimination due to a person’s age, sex, gender, disability, racial heritage, religious belief, sexual orientation, appearance or cultural background, marriage or civil partnership, pregnancy and maternity. This can include unfair or less favourable treatment, sexual or gender preference, slurs, harassment, name-calling, breaches of civil liberties, and unequal access to health or social care.

7. **Organisational abuse** is the mistreatment, abuse or neglect of children or young people by an organisation or its personnel. It can take place within settings and services that children or young people live in or use, and it violates their dignity, resulting in a lack of respect for their human rights. It can take the form of an organisation failing to respond to or address incidents of poor practice brought to its attention.

8. **Exploitation** Those who want to exploit children and young people will seek out those who are in vulnerable circumstances to use them for their own purpose, activity or gratification. This could be financial, commercial, sexual or related to extremism and terrorism. Exploitation involves a process of grooming; when someone builds an emotional connection with a child or young person to gain their trust for the purpose of exploitation. They may also manipulate their environment, so they become isolated from those who could help or support
them. Those affected may not realise they have been groomed, or that what has happened is abuse. Exploitation can occur online as well as in-person.

9. **Harmful traditional practices** are forms of violence which have been committed (primarily against women and girls) in some communities and societies for so long that they are considered, or presented by abusers, as part of accepted practice. Such traditions include Female Genital Mutilation (FGM) and forced early marriage. They may also include different forms of ritual ceremonies involving individuals in harmful religious or spiritual activities.

10. **Digital abuse** is the use of technology to harm and or abuse someone. Children and young people use the internet and their phones for social networking, playing games, searching for information and so on. However, this isn’t without its risks as children, and young people may experience different types of abuse, such as cyberbullying, emotional abuse, grooming, sexting, sexual abuse, and sexual exploitation.

11. **Bullying** is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end. Examples of bullying would include picking on someone or setting them up to fail or making threats or comments about someone’s job security without good reason.

12. **Harassment** is unwanted conduct that:

   - has the purpose of violating someone’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person, or is reasonably considered by that person to have the effect of violating their dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them, even if this effect was not intended by the person responsible for the conduct. Examples of harassment include:

     - demeaning comments about someone’s appearance;

     - unwelcome jokes or comments of a sexual or racial nature or about an individual’s age;

     - excluding an individual, because they are associated or connected with someone with a protected characteristic (e.g. their child is gay, a spouse is black, or parent is disabled);

     - repeated name-calling related to an individual’s religion or belief;

     - ignoring an individual because they are perceived to have a protected characteristic, whether or not they do (e.g. an employee is thought to be Jewish, or is perceived to be transgender);

     - the use of obscene gestures; and

     - the open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person (e.g. magazines, calendars or pin-ups).

These types of behaviour can be harassment whether they’re intended to offend or not. Something intended as a “joke” may offend another person. Everyone has the right to decide what is acceptable to them and to have their feelings respected.

It may not always be clear that some types of behaviour would be unwelcome (e.g. certain “banter”, flirting or asking someone for a private drink after work). In these cases, first-time conduct that unintentionally causes offence will not be harassment, but it will become harassment if the conduct continues after the recipient has made it clear, by words or conduct, that such behaviour is unacceptable to them. A single incident can be harassment if it is sufficiently serious.

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10 References for bullying and harassment included in GE’s Dignity and Diversity Policy, there is a standalone policy for sexual harassment.
13. **Exploitation** Types of exploitation include:

a. **Sexual exploitation**: a type of sexual abuse in which children or young people are sexually exploited for money, power or status. Some children and young people are trafficked into or within a country for this purpose. They may be tricked into believing they are in a loving, consensual relationship. Abusers will use various means to gain compliance such as drugs, alcohol, gifts, threats and bribes.

b. **Modern slavery (human trafficking)**: this includes forced labour, domestic servitude or coercing, deceiving and forcing an individual into a life of abuse. People are trafficked for sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and illegal work. Some people are coerced, but most are trapped in subversive ways. For example, promised education or ‘respectable’ work in restaurants or as domestic servants, or parents might be persuaded that their children will have a better life elsewhere.

c. **Radicalisation**: the process by which those who are vulnerable come to support terrorism or violent extremism and, in some cases, to directly participate in or support terrorist groups. There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas. The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. It may follow the experience of racism or discrimination. They believe that joining a movement offers social and psychological rewards such as adventure, camaraderie and a heightened sense of identity.
Annex 2

Reporting & Response Procedure Flow Chart - Global

You observe or receive a report of harm/abuse to a child

Listen & confirm facts

Immediately

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

Immediately

You observe or receive a report of harm/abuse to a child

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

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

Child & their trusted adult are provided with information about relevant services

Within 24 hrs

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

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

Inform the Country Director & Global Lead for Safeguarding

Immediately

Inform the COO, Director-People & Nominated Trustee

Within 48 hrs

Nominated Trustee informs the Charity Commission

For UK nationals or UK residents

Within 48 hrs

LADO informed in UK Children’s Services

Country Director contacts individual who may be suspended pending investigation

Within 24 hrs

Will the case be investigated by local authorities / police?

YES

Girl Effects cooperates with investigation

NO

Internal Investigation conducted

On-going
Annex 3: Cause for Concern

Girl Effect Cause for Concern Form

Please email this form to safeguardingconcerns@girleffect.org.

<table>
<thead>
<tr>
<th>Case Number (From Safeguarding Register)</th>
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<tr>
<th>Country</th>
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<tr>
<th>Does this case relate to: (circle)</th>
<th>Individual</th>
<th>Group</th>
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<tr>
<td>Category (circle)</td>
<td>TEGA</td>
<td>Springster</td>
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<thead>
<tr>
<th>Name:</th>
<th>Tel. Number &amp; Email</th>
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<tr>
<td>Relationship with Girl Effect</td>
<td>Relationship to Child</td>
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<tr>
<td>Date report submitted</td>
<td>Submitted to (Name &amp; role in GE)</td>
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<th>Was the concern:</th>
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<tr>
<td>Observed</td>
<td>Reported by a child</td>
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<th>Date of incident:</th>
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If reported by a third party, please state their name & relationship to the child:

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<tr>
<th>Details of Child/Children involved:</th>
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<tbody>
<tr>
<td>Name</td>
<td>Age</td>
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DETAILS OF Concern (What happened; When; Where; Who was involved)

VOICE: What does the child want to happen?

Discussion with Safeguarding Officer:

Agreements:

Date/Time:

CONNECTION: Is there a trusted adult who can be contacted to support the child?

Name of Trusted Adult:

Relationship to Child:

Contact Details:
Details of Discussion & Agreements with Trusted Adult:

VALUE: What actions were taken to ensure the immediate safety of the child?

CONNECTION: Was the case referred to the police or other government agencies?  
YES / NO  
If yes, please give details. If no, please give reasons.

CONNECTION: Was the child & their trusted adult referred to any other agencies or services?

<table>
<thead>
<tr>
<th>Date</th>
<th>Description of Decisions/Action taken/Outcomes</th>
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Reasons for Closing the Concern:

Learning: What can we learn from this concern that will help improve practice in the future?

Closure Approved by  | Date  
(Signature)        |      |