



Child and Youth Safeguarding Policy

April 2023

General information

| Approved by | International Senate | | | |
|-------------------|---|---------|------------|---------|
| Approved on | 25 April 2023 | | | |
| Version | 1 | | | |
| Binding for | All member associations of SOS Children's Villages International (ordinary members), including their affiliated entities; the members of their governing bodies; and their employees and others working for them or on their behalf and SOS Children's Villages International, including its affiliated entities; the members of its governing bodies; and its employees and others working for it or on its behalf | | | |
| Based on | <Name of Policy or Foundation> | | | |
| Replaces | Child Protection Policy | | | |
| Related materials | Child and Youth Safeguarding Regulation Misconduct Incident Management Regulation Misconduct Investigation Regulation Sexual Misconduct Regulation (PSHEA) Code of Conduct Responding to Past Abuse Incidents Regulation (upcoming) Safeguarding Hub - Home (sharepoint.com) | | | |
| Next review | July 2028 | | | |
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| Section | Amended on | Comment | | |

If you have any general questions about this policy, please contact: childsafeguarding@sos-kd.org.

Policy framework

The SOS Children's Villages policy framework has three levels of binding rules for member associations and SOS Children's Villages International. They build a hierarchy, starting with foundations as the highest, followed by policies and finally, regulations.





Categories of rules

This policy defines the following categories of rules.

Legally binding (B): legally binding rules of a policy constitute the minimum common standard to be implemented and applied by each member association and SOS Children's Villages International. Subject to applicable national laws, member associations or SOS Children's Villages International can apply a stricter standard for policies or its individual rules, but they cannot go below the standard of rules as defined in the policy. Each member association and SOS Children's Villages International are obliged to notify the CEO in the event one or more rules of the policy contravene applicable national laws and they must mitigate the consequences by proposing alternative solutions to ensure compliance. The breach of a legally binding rule entails consequences, depending on the gravity of the breach. This includes disciplinary measures for employees, suspension/termination of governing body membership or suspension/expulsion of federation membership. Legally binding rules are phrased as "**must**" requirements.

Recommended (R): recommended rules go beyond the minimum common standard and are not required to be implemented and applied by member associations. SOS Children's Villages International, as the norm-setting authority, however, will implement and apply recommended rules, and all member associations are strongly encouraged to follow this example as far as applicable national laws or their internal policies allow, in order to achieve more uniform standards across the federation. Recommended rules are phrased as "**should**" requirements.



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Purpose

SOS Children's Villages is committed to ensuring that in everything that we do, children and young people are safe, their rights are protected, and they are treated with dignity and respect. The purpose of the work of SOS Children's Villages is to ensure a safe and nurturing environment for children and young people without parental care or at risk of losing it, where that they can form trusting relationships and be supported to become strong and resilient. This Child and Youth Safeguarding Policy defines the minimum standards required of all individuals and entities working for or on behalf of SOS Children's Villages to ensure that our actions are guided first and foremost by the safety and well-being of children and youth who come into contact with us.

The Child and Youth Safeguarding Policy is not a stand-alone document and must be applied in conjunction with other relevant policies, regulations and guidelines – in particular but not limited to the [Code of Conduct](#), [Misconduct Incident Management Regulation](#), [Misconduct Investigation Regulation](#), and other specific child safeguarding and protection guidance. Further guidance on the implementation and application of this policy is contained in the Child and Youth Safeguarding Regulation [\[LINK\]](#). The Child and Youth Safeguarding Regulation is mandatory and must be complied with at all times.

Meaning of child and youth safeguarding

Child and youth safeguarding is the responsibility that SOS Children's Villages has to take all possible steps to make sure its staff and representatives, its operations and its programmes do not harm children and young people or expose them to any risk of harm, including harm caused by other children and young people in care of and supported by SOS Children's Villages, and to respond appropriately when harm does occur.

In this context, harm means abuse, neglect or exploitation of children and young people (see "Definitions").

Abuse, neglect and exploitation of children and young people:

- i. can be a deliberate act, accident or omission (such as failure to protect children, for example not supervising them adequately)
- ii. can be caused or carried out by an adult or a peer
- iii. result in actual harm to a child or young person or are likely to result in harm

Terms used

For the purposes of this policy, and to avoid repetition, the following terms are used:

- i. **SOS Children's Villages** – any entity associated with the SOS Children's Villages federation, including SOS Children's Villages International (including operations it runs in its own name and its governing bodies) and member associations. Where it is necessary to make a distinction between SOS Children's Villages International and the member associations, this is made clear in the text.
- ii. **Child** – anyone under the age of 18 years old, irrespective of the age of majority in local laws.
- iii. **Young person** – anyone between the ages of 18 to 24 years old.



Guiding principles

In all programmes and activities, those working for or on behalf of SOS Children's Villages must adhere to the guiding principles set out in this section.

Duty of care. SOS Children's Villages must take appropriate steps to ensure the safety and well-being of all children and youth in contact with the organization.

Do no harm. Any actions intended to safeguard children or youth from harm must not cause further harm or distress to the child or young person (for example, by re-victimizing or re-traumatizing them).

Non-discrimination and inclusion. Staff and others working for or on behalf of SOS Children's Villages must provide support and services in a way that does not discriminate against any child or youth based on their race, colour, sex or gender, language, religion, political or other opinion, national or social origin, property, birth or other status. This involves providing equal access to support and services appropriate to each person's needs and experiences. Where appropriate, additional measures should be taken to ensure the safety and well-being of groups of children who may be particularly vulnerable to abuse in the specific context (for example, girls, children with disabilities, different sexual orientation, etc.).

Zero tolerance against any form of child abuse, neglect and exploitation. All those working for or on behalf of SOS Children's Villages must report all concerns regarding child safety and well-being (even if no evidence exists and it is a vague concern) using the relevant reporting channels. All reports and concerns must be taken seriously, and appropriate action taken in line with the policy and other supporting regulations and guidance.

Best interests. The needs, rights and best interests of the child or young person must be the primary consideration in all decisions and actions concerning their safety and well-being, in line with the UN Convention on the Rights of the Child.

Child and youth participation. The views, choices and experiences of children and youth must be taken into account when assessing the short- and long-term impact of any decision on their well-being and safety. Children and youth must also be given opportunities to provide input on child and youth safeguarding planning and actions.

Multidisciplinary work. An interdisciplinary approach considering the different areas of competence or expertise must guide the decision making for the benefit of children and young people.

Cultural sensitivity. SOS Children's Villages recognizes that there are many ways of caring for children and youth and promoting their safety and well-being. However, SOS Children's Villages condemns all practices which constitute any of the abuse types as listed in this policy.

Victim/survivor-centred approach. When working with children and youth who have experienced harm, SOS Children's Villages must put the needs and rights of the victim/survivor at the centre of decision making. The victim/survivor has the right to be listened to, believed and supported in a way that respects their wishes and choices and considers their needs and experiences. They have the right to be involved in decisions that affect them.

Consent. Nothing in this policy should be understood as compelling or requiring a victim/survivor to disclose their experiences against their wishes. Consent must always be sought from victims/survivors in relation to actions taken, including referral to protection services. However, for children and young people,



consent must be carefully balanced with their best interests and the child's ability to make informed decisions.

Confidentiality and need to know. Staff and others working for or on behalf of SOS Children's Villages must keep Personal data about a child or young person and their situation, including their family, confidential. Such data can be disclosed only to individuals who are authorized to access it to perform their duties, for example to ensure a child's safety, or where express permission is given by the child or their legal guardian for information to be shared.

Prevention and response actions. Measures must be taken both to prevent incidents and concerns arising and to respond when incidents occur. Without exception, every victim/survivor must have access to appropriate, accessible, timely and high-quality support services.

Compliance with the law. Staff and others working for or on behalf SOS Children's Villages must respect and follow local and national child protection laws and applicable international and regional human rights frameworks.

Working with others. SOS Children's Villages must collaborate with local and national organizations and agencies including law enforcement, social services, health care providers and Ombuds Offices to safeguard children and youth, and to strengthen overall child protection frameworks.

Accountability. SOS Children's Villages is accountable to children, youth and others whom it serves for the safeguarding of all children and young people. All actions taken and decisions made under the policy must be recorded.

If circumstances arise which are not described or covered by this policy, then the spirit of the policy, as described in these guiding principles, and the more detailed Child and Youth Safeguarding Regulation [\[LINK\]](#), must be applied.

Application and scope

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| 1.1 | This policy applies to all those working for or on behalf of SOS Children's Villages in any capacity, whether paid or unpaid. This includes but is not limited to staff (full- and part-time), volunteers, board members and members of other governing bodies, consultants, contractors, suppliers, partners, donors, and visitors to SOS Children's Villages premises. | B |
| 1.2 | All those working for or on behalf of SOS Children's Villages must comply with this policy at all times. | B |
| 1.3 | All individuals and entities working for or on behalf of SOS Children's Villages must protect children and young people against any harm. This policy covers all forms of harm toward children and young people. | B |
| 1.4 | This policy covers: <ul style="list-style-type: none"> i. Children who come in contact with SOS Children's Villages. ii. Young people in contact with the organization up to the age of 24 years old. | B |



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| <p>Being in contact with the organization includes, but is not limited to:</p> <ul style="list-style-type: none"> • being in the organization's care; • receiving any other type of support or service (for example, family strengthening services, humanitarian services in an emergency, medical care, day care, education or training, and counselling); • participating in any event or activity involving anyone working for or on behalf of the organization; • involvement in research or consultation; • interacting in any other way and for any duration with any person working for or on behalf of the organization, whether that person is on or off duty; and • receiving any type of service offered by a partner, contractor or any other party working on behalf of the organization or in cooperation with SOS Children's Villages. | |
| <p>1.5 Where staff or others working for or on behalf of SOS Children's Villages have reason to believe that the safety and well-being of a child who is not in contact with SOS Children's Villages (for example, a child living in a nearby community) may be at risk, then such concerns must be reported to the appropriate local child protection agency and/or the police, as required by local law and policy.</p> | B |
| <p>1.6 Safeguarding incidents reported by or relating to those who have already left SOS Children's Villages alternative care or another type of support or service, which occurred while the person was a child or youth in direct contact with SOS Children's Villages, must be managed in accordance with the procedures for incidents of past abuse (upcoming).</p> | B |

Prevention

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| <p>2.1 SOS Children's Villages must put in place structures and processes to identify, prevent and respond to safeguarding risks and concerns in its programmes and operations, and continuously assess and manage safeguarding risks. These actions must be based on a comprehensive understanding of the local and national child protection context and up-to-date risk assessments.</p> | B |
| <p>2.2 Before a new project is developed, a risk assessment must be completed. Existing risk assessments for ongoing activities must be reviewed and updated annually. Such assessments must take into account the specific nature of operations and activities planned and consider the local context so as to understand how these factors impact on safeguarding. Mitigating actions, with appropriate resources, must be identified.</p> | B |
| <p>2.3 All those working for or on behalf of SOS Children's Villages must be vetted (in compliance with local labour and contract laws) to ensure that they do not pose a risk to children. They must be required to sign the Child and Youth Safeguarding Policy before their contract is finalized and any work commences.</p> | B |
| <p>2.4 All contracts with consultants, contractors, suppliers and partners must include a specific reference to the Child and Youth Safeguarding Policy and the Code of Conduct.</p> | B |



Awareness and training

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| 3.1 | SOS Children's Villages must provide this policy to children, young people and adults (including those working for or on behalf of SOS Children's Villages) in age-appropriate, culturally acceptable and accessible formats, in relevant local languages. | B |
| 3.2 | Appropriate training and orientation regarding this policy and the SOS Children's Villages approach to child and youth safeguarding, including regular refresher trainings, must be provided to all those working for or on behalf of SOS Children's Villages and to all children and young people in contact with the organization. | B |
| 3.3 | All programme visitors (e.g. donors, sponsors, journalists, foreign visitors, and partners) must receive orientation on the safeguarding rules they will need to follow before their visit takes place. | B |
| 3.4 | Staff with specific responsibilities for the direct care of children or for implementing child and youth safeguarding procedures must receive additional training to enable them to effectively discharge their roles. | B |
| 3.5 | <p>Except for information-giving sessions limited to raising awareness of the policy and how to report concerns, child and youth participation in other activities related to safeguarding must always be voluntary.</p> <ul style="list-style-type: none"> i. Children and youth must be informed of the purpose of the session and how their inputs will be used, and consent from the children and young people must be sought and kept on file. ii. Where appropriate, SOS Children's Villages should also seek the informed consent of the legal guardian of the child for the participation of their child. | B |

Reporting concerns and incidents

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| 4.1 | SOS Children's Villages must establish safe, accessible, appropriate and accountable reporting procedures, including independent channels such as through Ombuds' Offices. Specific child-friendly reporting channels must be put in place for children and youth. Ways of reporting concerns and incidents (including anonymous reports) must be widely publicized. | B |
| 4.2 | All reports must be considered seriously, regardless of how much time has elapsed since the incident is said to have occurred and irrespective of who is the subject of the report, the reporter or the alleged perpetrator, even if the incident seems unlikely or fantastical. | B |
| 4.3 | Where a report is made in good faith, no retaliatory action may be taken against the person who made the report, even if it is subsequently determined that the report was unfounded. | B |



Responding

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| 5.1 | In a life-threatening situation, anyone working for or on behalf of SOS Children's Villages must take action in order to immediately protect the child or young person. The situation must be reported as soon as possible. | B |
| 5.2 | SOS Children's Villages must respond to all reported incidents and concerns. This includes ensuring that those who have experienced abuse, neglect or exploitation are appropriately supported. | B |
| 5.3 | All those working for or on behalf of SOS Children's Villages must fully cooperate with any assessment or investigation of a safeguarding concern, whether conducted internally or by an agency mandated by the state authorities. | B |
| 5.4 | SOS Children's Villages must hold every person found guilty of abuse, neglect, exploitation or other misconduct related to safeguarding accountable. The consequences faced by the guilty party must be in proportion to the severity of their wrongdoing and in line with national legislation. The position or status held by the person accused of misconduct must not affect management of the reported incident or the consequences they face for their misconduct if found guilty. Where applicable, action against a person found guilty must include referral to the relevant law enforcement authority. | B |

Monitoring and evaluation

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| 6.1 | SOS Children's Villages must monitor, evaluate and audit the implementation of and compliance with this policy. | B |
| 6.2 | When requested, member associations, operations runs by SOS Children's Villages International or partners implementing a project or activity with or on behalf of SOS Children's Villages must provide information regarding their actions taken to implement the policy, including data on reported and confirmed child and youth safeguarding incidents, so that SOS Children's Villages International and Ombuds' Offices can assess the effectiveness of implementation across the organization. | B |

Responsibilities

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| 7.1 | Each member association, SOS Children's Villages International and each operation run by SOS Children's Villages International must have a specific description of its child and youth safeguarding organizational structures, the roles and responsibilities of the staff involved and other persons working for or on behalf of SOS Children's Villages, and communication flows for matters relevant to child and youth safeguarding. This must be made available to all those working for or on behalf SOS Children's Villages. | B |
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Annex 1: Definitions

| Term | Definition |
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| Abuse | Any action or lack of action, whether deliberate or accidental, which causes harm to a child or young person. By convention, there are four main categories of abuse recognised internationally: physical, emotional (psychological), sexual and neglect. SOS Children's Villages International also recognizes bullying, financial abuse and violation of privacy as specific forms of abuse. |
| Bullying | Bullying is a form of persistent threatening and aggressive physical behaviour or verbal abuse directed towards other people, especially those who are younger, smaller, weaker, or in some other situation of relative disadvantage. Cyberbullying is verbally threatening or harassing behaviour conducted through electronic technology as cell phones, e-mail, social media, or text messaging. |
| Emotional abuse | Behaviour, speech and actions such as bullying, intimidating, threatening, taunting, ridiculing, degrading, humiliating or creating a hostile or fearful environment that has a negative impact on a child's self-perception and development. Emotional abuse can also be inflicted online. |
| Exploitation | The use of a person in order to benefit self or a third party in cash or in kind. Exploitation is a complex manifestation of abuse which involves one or more of the main forms of abuse (physical, emotional or sexual abuse or neglect). It also includes exploiting the traumatic experiences of an individual child or young person to induce sympathy in target audiences for fundraising purposes. Exploitation also includes employing children for domestic labour. |
| Financial abuse | Financial abuse relates to incidents where children and young people become victims of theft, waste or misuse of their financial means, including daily allowances, leaving care support funds, sponsorship donations, and the like. |
| Child and youth safeguarding | Responsibility of SOS Children's Villages to take all possible steps to make sure its staff and representatives, its operations and its programmes do not harm children and young people or expose them to any risk of harm, and to respond appropriately when harm does occur. |
| Child and youth safeguarding incident | <p>A situation when a child or young person is harmed as a result of action or inaction by staff, volunteers, members of governing bodies or any other persons working for or on behalf of SOS Children's Villages International or its member associations, or by a child or young person entrusted into alternative care or youth care organized by SOS Children's Villages.</p> <p>Specifically in the case of children and young people entrusted into alternative care or youth care organized by SOS Children's Villages, an incident may also involve a situation when a child or young person is harmed as a result of action</p> |



or inaction by a member of their family of origin, or by another adult from the community.

This definition includes the following:

- a. situations when children impacted by abuse and neglect do not receive necessary support and remain vulnerable to further abuse or replicate abusive behaviour towards their peers
- b. situations when peer violence among children or young people is not addressed by appropriate actions
- c. situations when staff fail to meet their duty of care obligations, for example by failing to respond appropriately to reported concerns

Governing body

Supervisory body of a member association.

Grooming

The process of establishing a relationship with a child or a young person over a period of time with the objective of sexual abuse at a later stage, including acts online (*Sexual Misconduct Regulation*).

Neglect

Inattention or omission to provide adequate supervision, nutrition, clothing or shelter, or violation of the child's right to health, education and safety. This includes failure to provide adequate support to children impacted by abuse and neglect, failure to address peer-to-peer violence, and failure to respond to child and youth safeguarding concerns.

Peer-to-peer violence

Peer-to-peer violence describes incidents where children and young people abuse other children or young people. This can be in person or online and can include:

- i. physical abuse
- ii. sexual abuse (including sexual coercion, harassment and exploitation)
- iii. emotional abuse (including harassment, coercion and exploitation)
- iv. financial abuse
- v. bullying
- vi. violation of privacy

Personal data

Any information relating to an identified natural person or one who can be identified, directly or indirectly, in particular by name, an identification number, location data, an online identifier or one or more factors specific to the identity of that natural person.

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).

Physical abuse

Physical injury or mistreatment of a child such as hitting, slapping, shaking, pushing, biting, hair or ear pulling, acts of corporal punishment or other actions that cause physical pain and/or harm. Corporal punishment is prohibited by this



policy in all member associations and operations run by SOS Children's Villages International, regardless of whether it is allowed by law.

In all member associations and operations run by SOS Children's Villages International, it is also prohibited to practice harmful and potentially harmful traditional practices resulting in physical pain and/or harm, including female genital mutilation.

Sexual abuse

The actual or threatened intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual abuse may be contact or non-contact, including acts online (*Sexual Misconduct Regulation*).

Sexual harassment includes any unwanted sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be perceived to cause offence or humiliation to another, including acts online (*Sexual Misconduct Regulation*).

Sexual exploitation is any actual or attempted abuse of a position of differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another, including acts online (*Sexual Misconduct Regulation*).

Sexual coercion means the use of verbal or physical means (including administering drugs or alcohol either with or without consent) to obtain sexual activity without freely given consent. Sexual coercion includes psychological or emotional pressure and sexual grooming and can also take place online (*Sexual Misconduct Regulation*).

Any sexual activity of any kind between a child and those working for or on behalf of SOS Children's Villages is considered sexual abuse.

Violation of privacy

The protection of a child's privacy refers to personal data of the child or young person as well as pictures, texts, films or other materials which are produced for publicity purposes. Violation of privacy refers to arbitrary or unlawful interference with the privacy. This includes, but is not limited to: disclosure of information about a child's or young person's history, medical condition and family background to others without a legal reason; being a subject to searches of personal belongings; unnecessary surveillance e.g., with CCTV; and monitoring and disclosure of correspondence and online communication.

However, limited interference of a child's privacy does not constitute a violation of privacy if it is necessary for reasons of safety and security and is in the best interest of the child; the degree of interference is proportionate to any legitimate risk and, where applicable, it is conducted by law enforcement based on a duly authorised warrant.