CHILD PROTECTION & SAFEGUARDING POLICY

Preventing harm | Reporting concerns |Protecting children

July 2020

This policy applies to all personnel, volunteers, contractors, partners and representatives of Silent Cry Foundation and all activities connected with the Foundation.

Document Control

Policy title	Child Protection & Safeguarding Policy
Organisation	Silent Cry Foundation (SCF)
Version / status	Version 1.0 — Draft for Board Review
Policy owner	Child Safeguarding Focal Point / Director General
Approval authority	Board of Directors
Effective date	To be inserted upon approval
Review cycle	At least every two years, or sooner after a serious incident or material change
Related documents	Code of Conduct; PSEA; HR Recruitment; Complaints and Whistleblowing; Incident Reporting; Data Protection and Communications Procedures

1. Purpose and Commitment

Silent Cry Foundation (SCF) is committed to protecting every child who comes into contact with its programmes, personnel, operations, communications or partners. Children must be treated with dignity and protected from abuse, exploitation, neglect, violence, discrimination and other harm. The safety and best interests of the child take priority over organisational reputation, programme targets, convenience or personal relationships.

SCF adopts a zero-tolerance approach to child abuse, sexual exploitation and abuse, grooming, retaliation against reporters, and deliberate concealment of safeguarding concerns. All concerns must be reported and assessed; proof is not required before reporting.

2. Scope and Definitions

This policy applies to Board members, employees, temporary personnel, consultants, volunteers, interns, visitors, contractors, suppliers, implementing partners and anyone acting for or representing SCF. It applies in offices, project sites, distributions, community activities, transport, accommodation, field visits, online spaces and any setting connected to SCF.

A child is any person under 18 years of age, regardless of local definitions of adulthood, marital status, disability, gender, nationality, displacement status or other characteristic. Child safeguarding means the policies, procedures and actions used to prevent and respond to harm arising from an organisation's personnel, programmes, operations, partners or activities.

Abuse includes physical abuse, sexual abuse and exploitation, emotional or psychological abuse, neglect, trafficking, harmful practices, bullying and exploitation. Online abuse includes grooming, sexualised communication, coercion, cyberbullying and misuse of a child's personal data or image.

3. Guiding Principles

- The best interests and safety of the child are paramount.
- Every child has equal rights to protection without discrimination, including children with disabilities and those affected by conflict, displacement, poverty or family separation.
- Listen to children and take their views seriously in an age-, language- and disability-appropriate way.
- Do no harm: avoid actions that increase danger, stigma, retaliation or exposure.
- Everyone has a duty to report concerns; only appropriately trained people should lead case management or investigations.
- Confidentiality and information sharing are limited to those who need information to protect the child and fulfil lawful duties.
- Responses must be child-friendly, survivor-centred, timely and respectful of dignity and participation.
- Handle allegations impartially without prejudging findings or exposing children to further risk.

4. Roles and Responsibilities

Role	Minimum responsibilities
Board of Directors	Approve the policy; oversee safeguarding risks and resources; ensure independent escalation; receive anonymised trend reports and serious-incident notifications as appropriate.
Executive Director	Accountable for implementation, reporting channels, safe recruitment, partner compliance, training, and timely escalation to the Board and donors where required.
Child Safeguarding Focal Point (CSFP)	Receive concerns; assess immediate safety; maintain restricted records; coordinate safe referrals; monitor actions. Must not manage a case where they are implicated.
Managers / Project Leads	Assess risks before activities; ensure safe staffing and supervision; communicate reporting channels; escalate concerns and implement corrective actions.
HR / Recruitment Lead	Apply safer recruitment and reference checks; obtain signed conduct commitments; maintain appropriate records securely; coordinate induction and training.
All personnel and volunteers	Follow this policy; maintain boundaries; report concerns immediately; cooperate with authorised processes; never retaliate or investigate independently.
Partners and contractors	Meet SCF safeguarding standards; brief their personnel; promptly report concerns; cooperate with referrals and corrective action.

SCF should appoint a primary and alternate Child Safeguarding Focal Point and publish verified contact details internally and in child-friendly formats where appropriate. If a concern involves the focal point, Executive Director or another senior leader, report directly to the Board-designated independent contact or appropriate external authority. Never report a concern only to the person implicated.

5. Safer Recruitment, Induction and Training

- Assess safeguarding risks for each role, especially roles involving direct or unsupervised contact with children or access to child data.
- Verify identity, employment history, qualifications and at least two references where feasible; seek a reference about work with children for child-facing roles.
- Conduct lawful background or criminal-record checks where available and appropriate. If formal checks are unavailable, document alternative checks and risk controls; lack of a check is not proof of suitability.
- Require personnel to sign the Child Safeguarding Code of Conduct before starting duties. No unsupervised child-facing work until required checks, induction and authorisation are complete.
- Provide induction before deployment and refresher training at least annually; provide additional training for focal points, case managers, drivers, communications staff and programme leads.
- Include safeguarding clauses, reporting obligations, cooperation requirements and consequences for breach in employment, procurement and partnership agreements.

6. Code of Conduct and Safe Interactions

- Treat every child respectfully and fairly. Never shame, humiliate, intimidate or punish a child through violence.
- Maintain professional boundaries. Never engage in sexual activity or romantic relationships with anyone under 18, regardless of claimed consent or local custom.
- Never hit, threaten, exploit, groom, sexually harass or otherwise abuse a child; never exchange assistance, goods, services, money or opportunities for sexual contact or access.
- Avoid isolated one-to-one situations. Use observable settings and risk-based supervision arrangements wherever feasible.
- Do not invite a child to a private residence, share sleeping accommodation or arrange private transport without documented authorisation, safeguards and required caregiver consent. Emergency exceptions must be necessary, documented and reported.
- Use approved, transparent channels for work-related communication with children. Do not privately message children through personal accounts.
- Never request, create, store, send or share sexualised images of children. Do not photograph or record a child in a degrading, unsafe or identifying context that creates risk.
- Physical contact must be necessary, appropriate, explained, proportionate and respectful of the child's wishes and dignity.
- Do not discriminate, favour children for personal benefit, or use a position of power to influence a child or caregiver.

- Report accidental injury, boundary breaches, unsafe practice, missing-child incidents, disclosures, allegations or suspected abuse immediately.

7. Safe Programme Design and Delivery

- Complete a documented child-safeguarding risk assessment before each new project, distribution, event, field visit, research activity or material programme change; review it when conditions change.
- Consider risks from participant selection, cash and in-kind assistance, registration, queues, transport, accommodation, WASH facilities, photography, digital tools, volunteers and partner interactions.
- Use safe and accessible venues, appropriate supervision, child-friendly information, complaints channels, and clear arrival, departure, transport and reunification arrangements.
- Explain activities, expected conduct and reporting routes to children and caregivers in accessible language and formats.
- Obtain informed caregiver consent and age-appropriate child assent for participation, travel, referrals, research and use of images where appropriate. Consent must be voluntary and not a condition for receiving assistance unless strictly necessary for the activity.
- Never make assistance conditional on providing a photograph, story, interview, personal data or publicity material.
- Assess risks relating to child labour, family separation, trafficking, exploitation, recruitment by armed actors and unsafe referrals; use appropriate specialist pathways.
- Screen partners proportionately for safeguarding capacity and agree corrective action where gaps exist. Suspend activities or terminate arrangements where serious risks are not addressed.

8. Photography, Stories, Data and Digital Safety

- Use images and stories only for a legitimate purpose, with informed caregiver consent and child assent where appropriate; explain intended use and risks.
- Avoid publishing a child's full name together with an identifiable image, precise location, school, household details or sensitive case history unless a documented safeguarding assessment establishes a lawful and necessary exception.
- Do not stage humiliating or distressing scenes or portray children as helpless for fundraising.
- Use organisation-managed devices and secure storage where possible; restrict access, remove unnecessary geolocation metadata, and follow retention and deletion schedules.
- Never share identifiable case details or images through public social media, personal messaging groups or unauthorised cloud services.
- Report online grooming, image misuse, cyberbullying, data loss or unauthorised disclosure through safeguarding and data incident channels.

9. Reporting Concerns and Responding to Disclosures

Report immediately when a child may be unsafe. In an emergency, take reasonable steps to secure immediate safety and obtain urgent medical or emergency assistance. Do not wait for proof or internal permission before seeking urgent help.

1. Listen calmly. Let the child speak in their own words; reassure them that they did the right thing by telling and that the harm is not their fault.
2. Do not promise secrecy. Explain that information will be shared only with people who need to help keep them safe.
3. Ask only minimal, open questions needed to understand immediate safety needs. Do not interrogate, lead, repeatedly interview or ask the child to demonstrate what happened.
4. Do not confront the alleged perpetrator, arrange mediation, or alert anyone who may place the child at further risk.
5. Record the child's exact words where possible, date, time, location, people present, observations and actions. Separate facts from opinions or hearsay.
6. Report promptly to the Child Safeguarding Focal Point through the approved secure channel. If unavailable or implicated, use the alternate contact or appropriate external service.
7. Assess immediate risk, protection needs, safe caregiver involvement and whether referral to competent child protection, health, psychosocial, police or other services is appropriate and safe.
8. Document decisions, referrals and follow-up. Share information only on a need-to-know basis and in accordance with applicable law and the child's safety.

Caregiver involvement must be assessed case by case. Do not automatically inform a caregiver if they may be implicated, could retaliate or if notification could increase danger. Seek advice from qualified child protection professionals or competent authorities.

Where a concern relates to SCF personnel, consider immediate risk controls, including temporary reassignment or suspension from child-facing duties, without treating interim measures as a finding of guilt. External reporting must not be delayed by internal processes.

10. Case Management, Investigations and Fair Process

- Only authorised and competent personnel should coordinate safeguarding case management. SCF personnel should not conduct forensic interviews or criminal investigations.
- Separate the safeguarding response from any employment or disciplinary investigation.
- Use an impartial, conflict-free decision-maker. Anyone implicated or conflicted must not manage the case.
- Protect children and reporters from retaliation, intimidation, threats, adverse treatment or pressure to withdraw a concern. Retaliation is a serious policy breach.
- Protect fair process for the accused at the appropriate stage, provided this does not compromise child safety, evidence or an external investigation.
- Possible actions include training, restrictions, disciplinary action up to dismissal, contract termination, referral to authorities and partner corrective action.
- Close a case only when safety needs, referrals, actions and follow-up have been addressed or formally transferred to an appropriate service. Review lessons learned without identifying the child.

11. Confidentiality, Records and Information Sharing

Safeguarding records must be accurate, factual, dated, access-controlled and stored separately from general programme files where possible. Access is limited to authorised people with a legitimate safeguarding purpose. Do not promise absolute confidentiality.

Share information only, when necessary, proportionate, secure and lawful to protect a child, support a referral, meet a reporting duty or manage a legitimate investigation. Assess risks before sharing with caregivers, authorities, donors, partners or community leaders. Seek specialist advice where legal duties or risks are unclear.

Record access, sharing decisions, referrals and retention decisions. Retain records according to an approved schedule consistent with applicable law, donor obligations, investigation needs and the child's safety. Never store sensitive case details in open registers or routine email lists.

12. Complaints, Whistleblowing and Non-Retaliation

SCF must provide accessible, safe and confidential ways for children, caregivers, staff, partners and community members to raise concerns. Channels should reflect language, literacy, disability, gender, age and safety; they may include a focal point, designated phone or email, complaints box or trusted independent contact.

Complaints must be assessed promptly and referred through the appropriate safeguarding pathway. Anonymous concerns must be assessed on available information. No person may be punished for raising a concern in good faith or participating honestly in a response.

13. Partner and Third-Party Compliance

Before engagement, SCF should assess a partner's safeguarding policy, reporting pathways, focal point, safer recruitment, training, incident response and ability to protect child data. Agreements must set minimum standards, prompt reporting duties, cooperation requirements and consequences for non-compliance.

Monitor partner compliance proportionately to risk through induction, field monitoring, feedback, document review and corrective-action plans. Serious or unmanaged safeguarding risks may require suspension, referral to competent services or termination.

14. Monitoring, Accountability and Policy Review

- Track safeguarding risk assessments, personnel screening, signed codes of conduct, training, partner assessments, reports received, response timeliness and corrective actions, using anonymised information wherever possible.
- Review safeguarding risks and corrective actions at management level at least quarterly; report serious incidents promptly through approved governance and donor channels.
- Conduct post-incident reviews when safe and appropriate, without blaming the child or compromising confidentiality or external processes.

- Review the policy at least every two years, after a serious incident, when programme risks materially change, or when legal, donor or organisational requirements change.
- Communicate the policy in relevant languages and accessible formats, and ensure personnel, partners, children and caregivers know how to raise a concern.

15. Approval and Implementation

This policy becomes effective only when formally approved by the SCF Board of Directors. The Director General is responsible for implementation, resourcing, appointing focal points, training and ensuring reporting channels and supporting procedures are in place.

Approved date July 2020