

CHILD SAFETY IS EVERYBODY'S BUSINESS

Child safeguarding reporting and responding
procedures in member associations

March 2016 - Version 1.0

INTERNATIONAL POLICY SUPPORT DOCUMENT



CHILD SAFETY IS EVERYBODY'S BUSINESS.

CHILD SAFEGUARDING REPORTING AND RESPONDING PROCEDURES IN MEMBER ASSOCIATIONS

KEY USERS

Mandatory for:	All SOS co-workers, associates and partners at programme and national level
Recommended for:	Child safeguarding focal persons in all GSC offices, International Directors Region, Management Council, International Senate

RELATED POLICIES

Basic policy:	Who we are
Core policy:	SOS Child Protection Policy SOS Children's Village Programme Policy

RELATED DOCUMENTS, TOOLS, SYSTEMS

UN Guidelines for the Alternative Care of Children
Keeping Children Safe: Child Safeguarding Standards
Code of Conduct of SOS Children' Villages
Working together to protect children: Roles and responsibilities of the GSC in the reporting and responding process
SOS Children's Villages child safeguarding investigations

RESPONSIBLE FOR CONTENT

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CHANGE HISTORY

Version	Date	Changes
1.0	31.3.2016	Approved by the Management Council

**CHILD SAFETY IS EVERYBODY'S BUSINESS.
CHILD SAFEGUARDING REPORTING AND RESPONDING PROCEDURES IN MEMBER ASSOCIATIONS
ABBREVIATIONS USED IN THE DOCUMENT**

COO	Chief Operating Officer
CP	Child protection
CS	Child safeguarding
ECOM	External Communications
GSC	General Secretariat
HROD	Human Resources and Organisation Development
IDR	International Director of Region
IG	Individual Giving
IO	International Office
IOR	International Office Region
MA	Member Association
ND	National director

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DEFINITIONS OF THE TERMS USED IN THE DOCUMENT

Child protection	In its widest sense, child protection is a term used to describe the actions that individuals, organisations, countries and communities take to protect children from acts of maltreatment (abuse) and exploitation e.g., domestic violence, child labour, commercial and sexual exploitation and abuse, HIV, physical violence, to name but a few. It is also used as a term to describe the work organisations undertake in communities, environments or programmes to protect children from the risk of harm due to the situation they live in.
Child safeguarding	Child safeguarding includes all activities an organisation undertakes to ensure that its co-workers, operations, and programmes do no harm to children and do not expose them to the risk of harm and abuse; that appropriate responses and effective management of child safeguarding concerns are in place; and that any concerns the organisation has about children's safety in its own programmes and within the communities they work in are reported to the appropriate authorities.
Child safeguarding incident	A child safeguarding incident is a situation where the CP policy and/or the Code of Conduct have been breached. In a child safeguarding incident, multiple victims and perpetrators can be involved.
Initial incident assessment	The CS team's initial analysis of a reported CS incident or concern. It focuses on answering three questions: <ul style="list-style-type: none">- Is there an immediate risk for the safety of the child and/or the reporter involved?- Do the criteria for a high-profile incident apply?- Is there any conflict of interest at the level of the organisation responsible to deal with the incident which requires an escalation to the next level up?
Full incident assessment	Based on the outcomes of the initial incident assessment, the reported CS incident or concern is explored further. Depending on the nature of the incident, this full incident assessment is done either at programme or national level; however, the national CS focal person is always informed about its outcomes. The respective CS team gathers and analyses any available information about the incident as well as the risks for the victims, reporter and/or the organization. Based on the results of the assessment, decisions about further steps are taken. This can include a CS investigation or other corrective measures.
Child safeguarding investigation	In order to confirm or reject a reported incident or concern, a CS investigation can be commissioned. In this well-structured procedure with defined roles and responsibilities, evidence in different forms (written documents, interviews, video and audio recordings etc.) is collected. The overall frame of the whole investigation process is defined in the Terms of Reference. Findings of the CS investigation including recommendations are summarized in a CS investigation report.
Programme level	When this document speaks about programme level, it is seen from the perspective of the SOS Children's Village Programme Policy, i.e. 'programme' means all different types of interventions provided by the respective MA in one location. These programme components in one location form together one programme.
Reporter	The person who reports a CS incident, concern, allegation or suspicion.

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EXECUTIVE SUMMARY

SOS Children's Villages is committed to preventing child abuse and neglect whenever it can and to responding quickly and appropriately when a concern arises. This policy support document's main goal is to ensure appropriate responses and effective management of child safeguarding (CS) concerns at programme and national level. It is binding for all member associations and the procedures described must be applied in all SOS Children's Villages programmes.

The document is based on the following principles:

Act on your concerns

- Every co-worker, associate and partner has the responsibility to protect children from all forms of abuse, abandonment, exploitation, violence and discrimination.
- Every co-worker has the responsibility to report any CS suspicion, concern, allegation or incident immediately: **IF IN DOUBT, SPEAK OUT!**
- Every co-worker has the responsibility to act without delay: Failure to act may place the child in further danger.
- Involve the right people at the right time: CS reports should be made to the CS team at programme level and/or to the respective line manager.

Child Centred Approach

- The protection of children is the most important consideration.
- The health and welfare needs of the child are addressed as prime priority.
- Decisions within the reporting and responding process are based on the 'best interests of the child'.
- The views and wishes of the child are sought, taken seriously and inform decision-making as far as possible.

Timely and Appropriate Response

- The responsible co-workers ensure a timely, effective and appropriate response to a CS concern and/or incident.
- Confidentiality is ensured and information only shared on a 'need to know' basis.
- The responding process is based on a thorough understanding and full recognition of the local context, including local laws and child protection system.
- Working together with other agencies, including statutory/national agencies for the protection of children is essential.

The procedures in this document fully apply to all children¹ and young adults in SOS programmes. For young adults over the age of 18 years, decisions are taken in dialogue with them.

This policy support document complements the "[Working together to protect children: Roles and responsibilities of the GSC in the reporting and responding process](#)" and "[SOS Children's Villages child safeguarding investigations](#)" and does not replace these existing documents.

1 Getting started

The reporting and responding processes described in this document apply to all our member associations working with children. Each MA needs to adopt these procedures to its local child protection and legal context. In this regard, the SOS Child Protection Policy serves as our internal law.

1.1 Nominating CS focal persons and teams

Member associations define clear and efficient channels to report any CS concern or incident by internal and external reporters. Information on how to report a CS concern or incident is regularly shared with all children, youth and families participating in SOS programmes, with all co-workers, associates and partners as well as the children's legal guardians (parents, child welfare authority etc.). At the same time, information about how to report a CS concern or incident needs to be easily accessible at all times.

Ideally, every child has at least one person he or she can trust and turn to in case of feeling unsafe or insecure about a situation. Who that person is, is up to the child and cannot be based on a "nomination" or recommendation from the organization. However, the child needs to be informed about all available reporting channels.

¹ According to the UNCRC a child is "every human being below the age of 18 years unless national law recognises the age of majority earlier"

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If a child shares information about an alleged CS incident with an SOS co-worker or associate, this person has to report the incident within 24 hours to a co-worker designated to deal with CS issues.

1.1.1 CS team at programme level

In accordance with the SOS Child Protection Policy, each MA assigns co-workers in all programmes and the national office to whom CS incidents can be reported.

The CS team at programme level consists of three co-workers. They are responsible for:

- Raising awareness of the SOS Child Protection Policy principles
- Develop a local strategy for the SOS Child Protection Policy implementation
- Preventing and mitigating possible CS risks for children
- Responding to all reported CS concerns and incidents in the programme

Members of the CS team at programme level are appointed by the national director (ND) in consultation with the national CS focal person based on the nominations from the programme. Views and nominations from children, young people and families participating in the programme are sought for and taken into consideration. At least, they are asked for their opinion through an anonymous poll and are never asked to share their nominations in public. The programme director is automatically a member of the CS team. He or she coordinates the CS team's work, takes decisions regarding actions and shares information about all reported CS concerns and incidents with the national CS focal person.

The programme director is responsible for organizing and driving the Child Protection Policy implementation and child safeguarding actions at programme level including sharing information about the current status of the Child Protection Policy implementation with the national CS focal person.

1.1.2 National CS focal person

At national level, a CS focal person is nominated who is responsible for:

- Coordinating the development and prioritization of national CS actions during the annual planning process.
- Coordinating activities around CS awareness and prevention
- Following up on reported CS concerns and incidents with the CS team at programme level
- Maintaining a National Child Safeguarding Incident Register (see chapter 3.2)
- Improving existing reporting and responding procedures

The position of the national CS focal person and the CS reporting and responding procedures are reflected in the MA's organizational structure. The CS focal person is a member of the national CS team.

1.1.3 National CS team

The national CS team consists of 2 to 4 people and it is strongly linked to the national management team. The ND is automatically chairing the national CS team. He or she has the ultimate responsibility for the implementation of the SOS Child Protection Policy in the MA. Besides the ND and the national CS focal person, the national CS team includes up to 2 other members of the national management team. The national CS team members are appointed by the national director.

1.2 Involving children and young people

When implementing the Child Protection Policy and defining related CS measures and actions, including the views of the children and young people participating in our programmes is very important. This can be done in different ways which also depend on the cultural context and the MA's organizational set-up. However, an atmosphere of open and honest discussion with children and young people is strongly promoted across the whole federation.

The programme director plays a key role in promoting child participation in CS as he or she is responsible for organizing and driving the Child Protection Policy implementation at programme level. CS teams at programme level organize regular prevention related activities with children and young people. All children and young people in our programmes are informed about the principles of the Child Protection Policy and related reporting and responding processes. They are encouraged to raise their questions and suggest improvements whenever they see it as necessary. Children's initiatives to discuss CS issues in other formal but also informal settings such as children and teenage clubs are always supported. Children and young people should also have the opportunity to provide their suggestions anonymously, e.g. through suggestion boxes placed in programmes. The national CS team is regularly informed about inputs provided by children

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and young people. These inputs are taken into account for the annual planning of CS activities at different levels of the organization.

Children and young people are also encouraged to report any CS concern or incident they become aware of. Information about who the members of the CS team at programme level are and how to report CS incidents to them is widely publicized. Anonymous reporting must also be possible, e.g. via a specific email address or through reporting boxes placed in a programme. In addition, children and young people are informed about external partners like Child Help Line they can turn to in case they feel unsafe.

1.3 Local mapping

A key element in responding appropriately and effectively to CS concerns is to have a clear picture of the local child protection context, so that the response is in line with the legal and social welfare realities. All MAs are asked to carry out the local mapping exercise as described below.

The mapping process is done by every CS team at programme level, in order to establish links to the responsible local authorities. The national CS team led by the national CS focal person completes the mapping process by covering the national level with processes and connections valid for the whole MA. The findings of the mapping exercise are made available to all CS teams and senior staff members of the MA.

The outcomes of the analysis are one of the main inputs for drafting CS actions at national and programme level. The local mapping is updated every 3 to 5 years or when there is significant change in the national child protection context. Templates for mapping the local context and at national level are provided in a separate document (Tools 1 and 2).

1.4 Risk assessment and risk mitigation

It is important to manage and minimise possible child safeguarding risks related to the processes and practises in different areas of work at all levels of the organization. To identify these risks, every member association conducts a child safeguarding risk assessment. The risk assessment is conducted at least annually and its findings are used as an input for the annual planning process.

The risk assessment is done by every programme CS team. The national CS team led by the national CS focal person completes the risk assessment by covering the national level. The findings of the risk assessment are inserted in the national CS risk register. The national CS risk register is maintained by the national CS focal person.

Each identified CS risk must be addressed and mitigated by an appropriate preventive action. Outcomes of the preventive actions are reviewed regularly by the CS team at the respective level of the organization. Findings of this review are shared with the national CS focal person who updates the national CS risk register accordingly.

Templates of the risk assessment tool and the national CS risk register are provided in a separate document (Tools 3 and 4). The risk assessment tool was originally developed by Keeping Children Safe as part of the Child Safeguarding Standards.

2 Definition of CS incidents

A child safeguarding incident is a situation where the CP policy and/or the Code of Conduct have been breached. In accordance with the SOS Child Protection Policy, any reported CS concern or incident is taken seriously and listened to carefully. We differentiate the following categories of CS incidents:

2.1 Internal CS incident

An incident is considered as an internal CS incident if any of the criteria mentioned below is met:

- A child in direct SOS care is involved in a reported child safeguarding incident either as victim or perpetrator;
- An SOS employee or associate is involved in a reported child safeguarding incident as a perpetrator;

The organisation has to address every reported internal CS concern or incident even if the external authority (e.g. child welfare authority, police or court) decides that it is not in conflict with the national law. The SOS Child Protection Policy and the Code of Conduct as our internal framework are always followed.

2.2 External CS incident

An incident is considered as an external CS incident if the child is not in direct care of SOS, and the perpetrator has no links or associations to our organisation.

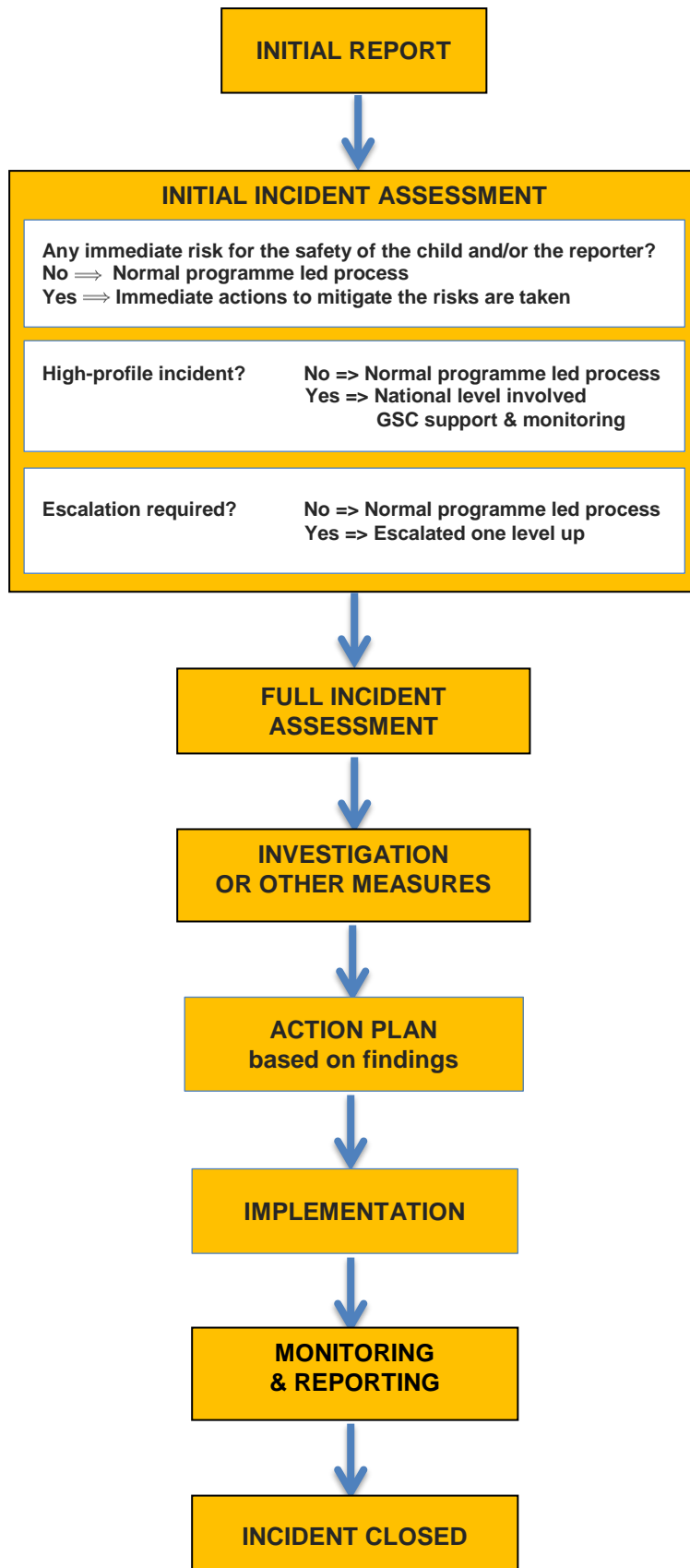
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An external incident is only counted when SOS Children's Villages is involved in dealing with the incident (i.e. through reporting to and/or supporting the responsible external authority).

The organisation has to report the "external" incident to the responsible external authority (e.g. child welfare authority, police or court) and to provide this external authority with further cooperation whenever requested. However, SOS Children's Villages does not investigate it further.

3 Reporting and responding process within MAs



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3.1 Reporting

When a CS incident or concern is reported to a co-worker at programme level, he or she shares it within 24 hours with the CS team in the respective programme. Details of the reported incident are recorded in the Initial Reporting Form. If it is not possible to contact any member of the CS team in the programme, the report is forwarded directly to the national CS focal person.

When a CS incident or concern is reported to a co-worker at national level, he or she shares it within 24 hours with the national CS focal person who informs the national CS team about the reported incident. Details of the reported incident are recorded. If the reported incident is related to a specific programme, the national CS focal person shares this information with the CS team in the respective programme unless there is a conflict of interest. In such case, the national CS team decides on how the incident is further dealt with.

If it is not possible to contact the national CS focal person, the report is forwarded to any other member of the national CS team including the ND as the chairperson of the national CS team. If due to any reason this is also not possible, the report is shared with the CS focal person in the IOR.

Any information on CS incidents or concerns can also be sent confidentially to the GSC through a reporting form on the website of SOS Children's Villages International. A template for the Initial Reporting Form is provided in a separate document (Tool 5).

3.1.1 Anonymous reporting

In every MA it has to be possible to report a CS incident or concern anonymously, both by internal and external reporters, e.g. via a specific email address or through reporting boxes placed in a programme. Anonymous reports are to be taken as seriously as 'named' reports, although the extent to which they can be investigated may be limited. Also for children and young people ways to report CS incidents or concerns anonymously are required, e.g. via a complaints box.

3.1.2 Failure to report and consequences

Every co-worker must report any CS incident or concern they become aware of. This commitment is included in the employment contracts of all SOS co-workers and associates. Reports have to be made even if the identity of the perpetrator is unknown. Failure to report may result in actions against the respective co-worker or associate. All co-workers, associates and partners need to be properly informed about possible consequences of failing to report a CS incident or concern.

3.1.3 False or malicious reporting

False or malicious allegations may occur. However, it is not possible to distinguish between founded and false or malicious allegations without following up on these by a full incident assessment and eventually a formal investigation. Not responding to a CS concern may result in further risks for children and/or the continuing suspicion against a co-worker which deprives them of the opportunity to clear their name.

No action will be taken against anyone who reports a CS concern in good faith even if upon investigation they were unfounded. However, if a co-worker knowingly and wilfully makes a false report or gives false or malicious information regarding another co-worker, disciplinary action is taken.

Discussing the reporting and responding mechanisms with children and young people helps them to understand their responsibility to not misuse these mechanisms for any other purpose. If an incident or concern reported by a child or young person within the programme is found to be a malicious allegation, it needs to be addressed primarily by an expert team supporting the child or young person and his or her family. Possible sanctions against the children and young people who submitted a malicious allegation can be taken according to the national legislation and the organization avoids any serious internal disciplinary actions such as removing the child or young person from the programme.

3.2 Registration

Every CS incident or concern reported to any co-worker in the MA is registered in the **National Child Safeguarding Incident Register**. The national CS focal person maintains this tool to monitor progress on all reported CS incidents².

² Child Safeguarding Incident Register includes anonymised data, so no details of alleged victims or perpetrators are revealed

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The register holds all information related to incidents received through the following channels:

- CS incidents which are reported directly to the national office or forwarded by the IOR
- All CS incidents which are reported at programme level

The national CS focal person updates the information in the register regularly, at least after every incident review (see chapter 3.7) or according to important incident developments. The template of the Child Safeguarding Incident Register is provided in a separate document (Tool 6).

3.2.1 Confidentiality

All information relating to CS issues, including details about alleged victims, witnesses and alleged perpetrators **must** be treated confidentially. This means handling information carefully and respectfully and only passing it on to those who really need to know. Usually, only the respective CS team dealing with the reported CS incident and the national CS focal person have full access to all information. **It does not mean keeping secrets.** Information about possible or actual child abuse must always be reported.

Every effort has to be made to ensure the security and confidentiality of these files (secure filing cabinet, password protected electronic files etc.) including when information is transferred, i.e. verbally, through email, electronically, or carried on portable electronic devices.

3.3 Initial incident assessment

To determine the exact nature of a CS incident or concern and to make decisions on next steps, basic information is required. The CS team at the respective level looks into the following questions:

- Is there an immediate risk for the **safety of the child** and/or the reporter involved? (Initial risk assessment)
- Do the criteria for a **high-profile** incident apply?
- Is there any **conflict of interest** at the level of the organisation responsible to deal with the incident which requires an escalation to the next level up?

The initial incident assessment can include collecting basic information about the alleged victims and/or perpetrators from their personal files kept by the organization, medical or police records of the incident, initial media coverage etc. It is important not to approach or inform the alleged perpetrator/s at this stage as this may put the child or children at risk and undermine any subsequent police or internal investigation.

If the reported incident or concern relates to a specific programme, this initial incident assessment is done by the CS team at programme level. If it is not possible to link the reported concern or incident to a specific programme, it is done by the national CS team.

The initial incident assessment is done within 48 hours after having received the report, and all collected information is shared with the national CS focal person. Outcomes of the initial incident assessment are not intended to verify or reject the reported incident, but serve as basis for planning next steps.

3.3.1 Criteria for a high-profile incident

A CS incident is considered as high-profile if at least one of the following criteria is met:

- Maltreatment, neglect or any other harmful activity that leads to severe health consequences, attempted suicide or death of a child or young person participating in one of our programmes.
- There is high media coverage, donor, public and/or government interest or the risk of it.
- A CS incident was escalated from the same MA to the GSC in the past five years.

3.3.2 Criteria for a conflict of interest

The term "conflict of interest" in a CS response refers to situations where:

- An allegation includes the management of a particular office or association.
- There is evidence of negligence on the part of the responsible MA or GSC office to meet the organisational requirements in dealing with the incident.

3.4 Actions taken

The following set of next steps is taken based on the outcomes of the initial incident assessment.

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3.4.1 Child and/or reporter safety

When the initial incident assessment identifies an immediate risk for the safety of the child and/or the reporter, this risk is highlighted to the responsible level of the organisation and immediate actions to mitigate the risks are taken. As a possible action, the alleged perpetrator may be suspended or removed from the programme until the allegation is fully assessed and further actions are defined.

3.4.2 High-profile incident

Based on the outcomes of the initial incident assessment, the national CS focal person decides, in consultation with the IOR CS focal person, whether it is a high-profile incident or not. If the reported incident or concern relates to a specific programme, the national CS focal person must consult with the respective programme CS team before making the decision.

If a CS incident is considered as a high-profile incident, the national CS focal person notifies the IOR CS focal person through a status report. The IOR CS focal person can enquire about the incident assessment from the national CS focal person. High-profile incidents are treated with priority and require more regular reporting on the progress of the incident.

The template for the status report for high-profile child safeguarding incidents is provided in a separate document (Tool 7).

3.4.3 Escalation

When a conflict of interest is identified at programme level, the ND can decide to escalate the incident to the national level. If there is disagreement between the CS team doing the initial incident assessment and the ND about a possible conflict of interest, the national CS focal person consults with the IOR CS focal person.

3.4.4 Referral to the responsible level

Based on the findings of the initial incident assessment, the CS team performing the initial incident assessment decides which level of the organization deals with the incident further. The national CS focal person can enquire about the decision from the respective team. The decision may change based on the development of the incident and findings of the full incident assessment.

Although some incidents are not considered as high-profile, they cannot be dealt with at programme level only. This includes incidents with a criminal background and incidents where a conflict of interest at programme level was identified.

Regular incidents:

- Incident dealt with by the programme CS team
- National CS focal person gets informed about the development of the incident and provides further support and advise to the CS programme team if requested
- Decisions are taken by the programme director and the national CS focal person gets informed

High-profile incidents and other incidents requiring particular attention:

- Incident dealt with by the programme CS team
- National CS focal person is involved, provides support and advise to the team, monitors the development of the incident and informs the national CS team
- If a decision is needed, it is taken by the national director

If the reported incident cannot be linked to a specific programme, the incident is dealt with by the national CS team.

3.5 Full incident assessment

The organisational level where the CS incident has been referred to (according to the outcomes of the initial incident assessment) takes on the responsibility for its full incident assessment and further steps.

The purpose of the full incident assessment is to review the details of all reports available to that date, collect more information about the incident when necessary, agree on the nature of the concern, and decide on immediate actions and next steps. The full incident assessment is also used as a frame for the regular review of the incident (see chapter 3.7).

A template for the full incident assessment is provided in a separate document (Tool 8).

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3.5.1 Responsibilities

Regular incidents:

The assessment of a regular CS incident is done by the programme CS team. The team may also involve other co-workers who are able to support the discussion and decision-making based on their knowledge and experience or their responsibility with regard to the child or the family involved.

The national CS focal person is informed about the findings of the assessment and shares this information with other members of the national CS team. Members of the national CS team can enquire about the findings from the national CS focal person.

If the reported incident cannot be linked to a specific programme, the assessment is done by the national CS team.

High-profile incidents and other incidents requiring particular attention:

For all high-profile incidents and other incidents requiring particular attention, the participants of the assessment are:

- Members of the national CS team
- The SOS Children's Village programme director and/or managing co-worker (e.g. village director) of the respective programme

When dealing with a high-profile incident or an incident requiring particular attention (see chapter 3.4.4), other experts may be drawn in to support the assessment. It is recommended to seek advice from or where necessary to include:

- Members of the CS team in the respective programme
- Human resources advisor/representative (for advice on employment matters, e.g. suspension, labour law considerations)
- Local external CS expert, CS advisor in the respective IOR and/or in the IO
- External communication co-worker in the MA (or regional editor, IOR or IO communications advisor)
- Others as appropriate e.g. members of the board of the MA, CVI representative

If any of the above listed persons is the alleged perpetrator, he or she must not be part of the assessment.

3.5.2 Assessment areas

The responsible team assesses, reflects on, decides and plans actions in relation to the following questions / areas:

- Immediate protection and medical and/or therapeutic support measures for the child
- Keeping the child informed about the process and asking him or her about their experiences
- Can the incident be referred to the local police for criminal investigation? Any rationale for not doing so must be recorded.
- Can the incident be referred to the local statutory government ministry investigating CS concerns?
- How to cooperate with and best support the responsible external authority?
- Informing the child's family of origin
- Which other parties - such as the legal guardian and/or agency that referred the child to SOS Children's Villages, other co-workers at regional, continental and/or international level - need to be informed?
- Is an internal CS investigation required?

3.5.2.1 Risk assessment

Special focus must be laid on potential risks with regard to the CS incident. The risk assessment is based on the outcomes of the initial incident assessment. Its main purpose is to deepen the initial risk analysis with a particular focus on the following questions:

- What is the risk?
- Who is at risk?
- What factors place him/her at risk?
- What protective measures are in place?
- What is the risk rating (low / medium / high) of the incident?
- What additional agreed protective measures are to be put in place?

The risks are reviewed and the findings are updated, whenever a significant change in the incident occurs.

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3.5.3 Action plan

Based on the results of the full incident assessment, an action plan including responsibilities and time frame is elaborated. All actions, outcomes and decisions are clearly recorded. The decisions and actions include informing other stakeholders as appropriate, e.g. members of the board of the respective MA, the CVI representative and the IOR CS focal person. Psychological support and/or counselling should be offered and made available both to the victim and the alleged perpetrator.³

A template for the action plan is provided in a separate document (Tool 9).

3.6 Actions implemented

For CS incidents dealt with on programme level, the programme director needs to agree with the proposed actions and is responsible for their full and timely implementation. For CS incidents dealt with at national level, the ND agrees on the proposed actions and is responsible for their full and timely implementation.

3.6.1 Commissioning a CS investigation

One outcome of the full incident assessment can be that an internal CS investigation is required. All CS investigations need to be commissioned by the responsible line manager.

Detailed information on the principles of CS investigations in SOS Children's Villages can be found in [SOS Children's Villages child safeguarding investigations](#).

3.7 Regular review

3.7.1 Regular incidents

Regular incidents are reviewed at least once per quarter by the respective MA. The review focusses on how the incident is dealt with, whether necessary actions are taken and information is shared with relevant co-workers.

- If the incident is dealt with by the programme CS team, the review is done by the CS team at programme level and the national CS focal person.
- If the incident is dealt with at national level, the review is done by the national CS team.

After completing the review, the national CS focal person updates the National Child Safeguarding Incident Register with the findings and the planned next steps.

3.7.2 High-profile incidents

High-profile incidents are reviewed according to their development but at least on a bi-weekly basis. The national CS focal person discusses the outcomes of the full assessment with the CS focal person in the IOR (4-eye principle). After every review, the national CS focal person shares the findings in a status report (Tool 7) with the IOR CS focal person, who updates the Regional Child Safeguarding Incident Register accordingly and assigns a colour rating to the incident.

COLOUR RATING OF CS INCIDENTS

GREEN

The member association (MA) takes the lead, and all steps and processes as defined in the SOS Child Protection Policy and related policy support documents are fully met. The required information is shared among the responsible co-workers within the MA and the different levels of the GSC on time.

YELLOW

The MA takes the lead, and in general the incident is handled in accordance with the SOS Child Protection Policy and related policy support documents, but there are areas in which the MA is unable to fulfil the necessary steps and/or processes and where support from the GSC or external partners is required. Other criteria for a yellow rating are delays and/or problems in the communication flow between the MA and the different levels of the GSC.

³ A person is innocent until found guilty. Being accused of child abuse can be devastating.

RED

There are serious concerns on how the MA is leading the incident and there are grounds for escalation. The steps and processes as defined in the SOS Child Protection Policy are not met and/or there are serious problems with the communication flow among the responsible co-workers within the MA and the different levels of the GSC. The incident needs to be escalated one level up.

4 Incident closure

4.1 Decision to close the incident

When the implementation of the action plan has met its goals, the responsible line manager closes the incident by signing off a closure notice based on the recommendation of the respective CS focal person. If the incident was referred to the external authorities, it cannot be closed till the authority officially closes the incident.

4.1.1 Regular incidents

If the incident is managed by the programme CS team, then the decision to close the incident is taken by the SOS Children's Village programme director and the national CS focal person is informed about the decision. If needed, the national CS focal person can enquire about the incident closure from the programme director.

4.1.2 High-profile incidents, other incidents requiring particular attention, and incidents handled at national level

If the incident is managed by the national CS team and in all high-profile incidents and other incidents requiring particular attention (see chapter 3.4.4), the decision to close the incident is made by the ND.

In high-profile incidents and incidents forwarded by the IOR, the national CS focal person informs the IOR CS focal person about the decision to close the incident in a status report (Tool 7). If needed, the IOR CS focal person can enquire about the incident closure from the national CS focal person.

4.2 Final report

Once the CS incident is closed, a final report is prepared by the respective CS team. The national CS focal person inserts the final report of every CS incident in the MA - containing key findings and related actions together with the closure notice - into the National Child Safeguarding Incident Register.

In high-profile incidents and incidents forwarded by the IOR, the national CS focal person shares the final report with the IOR CS focal person. A template for the final report is provided in a separate document (Tool 10).

4.3 Information to the reporter

Once the CS incident is closed, the final summary containing the key findings and actions taken relating to the reporter's allegations is communicated back to him or her by the national CS focal person. This report is edited in a way that protects the confidentiality of all persons involved. The reporter is also informed about the option to appeal against the outcomes of the CS incident in accordance with the national procedures.

For incidents initially reported to the IOR, it is the IOR CS focal person who informs the reporter on the findings and actions taken relating to the reporter's allegations. .

4.4 Lessons learnt

When an incident is closed, it is important to collect lessons learnt to inform improvements in processes and practice as well as to identify future training needs at programme and national level. The lessons learnt are collected by the respective CS team dealing with the incident in a report that is shared with the national CS focal person.

Based on the lessons learnt, the national CS focal person updates the national CS risk register (see chapter 1.4). He or she also shares the report with line management and the board of the MA. Lessons learnt are also fed back to all programmes and shared and discussed in relevant networks at different levels of the organization.

4.5 Appealing against decisions and actions taken

The reporter can appeal against the outcomes of the CS incident if he or she is not satisfied with how the incident was addressed. If the reporter appeals to the MA, the co-worker who receives the appeal shares it within 24 hours with the national CS focal person. The incident is explored further in consultation between the national CS focal person and the respective CS team and possible next steps are suggested to the ND. At the same time, also the IOR CS focal person is informed by the national CS focal person about the status of the appeal.

4.5.1 The National CS Ombuds body

Experience shows that sometimes a CS incident is reported again because the reporter is unhappy with how the incident was handled by the member association although a good process was followed. This is an opportunity for the organisation to ask for an external review to clarify whether a CS incident or concern has been responded to appropriately or not. The external review supports the organisation when incidents resurface and provides the opportunity to correct mistakes if they were made. Also with regard to media and government enquiries it can be a backup for the organisation.

Another scenario where an external review is indicated is when a reporter appeals to the MA and this appeal cannot be handled by the ND or there is a conflict of interest.

For such situations, a National CS Ombuds body may be established. The need to establish an Ombuds body depends on whether appropriate child welfare and judicial systems are in place in the country to deal with disagreements on outcomes. This information is gathered and analysed in the local mapping exercise (see chapter 1.3).

The National CS Ombuds body reviews the whole process of how the respective CS team managed the incident. This includes how the investigation was conducted, a review of the investigation report, a review of the action plan, actions implemented and support to victims provided. Based on the review findings and the additional information submitted by the reporter and the MA, the national CS Ombuds body decides either to take further actions or to close the incident. The national CS Ombuds body's decision is binding for all stakeholders.

Information about the decision is communicated back to the reporter and the respective MA as well as the IOR CS focal person.

4.5.2 Members of the CS Ombuds body

The national CS Ombuds body should be an independent body composed of three external experts with significant knowledge in the area of child safeguarding and child welfare who are nominated by the board. The CS Ombuds body meets within 60 days after having received information about the incident. Decisions taken by this Committee are final.

4.5.3 Anonymity of the reporter

The reporter can decide to remain anonymous, regardless of the channel he or she uses to submit the appeal. The reporter can also choose to remain anonymous for the respective MA while revealing his/her identity to the national CS Ombuds body. If the reporter wants to remain anonymous, the national CS Ombuds body takes all necessary steps to protect his/her privacy towards all other stakeholders involved in the incident and its review.

4.6 Periodic reporting

Details of all CS incidents are recorded at the level of the organization which deals with the incident. The national CS focal person keeps an up-to-date overview of the current status of all CS incidents reported at programme and national level or forwarded by the IOR CS focal person in the National Child Safeguarding Incident Register (see chapter 3.2).

The national CS focal person prepares an annual CS report covering the period of January to December and submits the report to the national director. The report includes the number of reported and confirmed CS incidents as well as lessons learnt collected in the CS incidents that the MA has dealt with in the past year. The national director shares the report with the board of the MA.

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4.6.1 Aggregated statistical reports

Aggregated statistical reports summarizing number, nature and current status of all CS incidents are submitted for review to the CS focal person at the next level up on an annual basis, covering the period of January to December.

In the annual statistical reports, the following information is collected:

- 1) The number of reported and confirmed CS incidents;
- 2) The number of child and/or adult perpetrators involved in all CS incidents;
- 3) The number of children and young people affected as victims in all CS incident;

A template of the annual statistical report is provided in a separate document (Tool 11).

Examples of **internal CS incidents**:

- An SOS mother physically abused 3 children in her SOS family.

Number of CS incidents	Number of victims	Number of perpetrators
1	3	1

- Two SOS employees abuses 5 children from the surrounding community.

Number of CS incidents	Number of victims	Number of perpetrators
1	5	2

Examples of **external CS incidents**:

- An SOS employee gets information that 2 children taking part in an FS programme were abused by their father. The MA reports this incident to the responsible welfare authority.

Number of CS incidents	Number of victims	Number of perpetrators
1	2	1

- The police requests support from an MA in a reported incident of sexual abuse of a child from the surrounding community taking part in an SOS educational programme. There are 2 alleged perpetrators from the surrounding community.

Number of incidents	Number of victims	Number of perpetrators
1	1	2

5 Handling Media Attention

If an incident of child abuse or neglect occurs in one of our programmes and becomes known to the public, it is essential to be cautious in the communication with media, so no additional harm to the persons involved in the incident as well as to the reputation of the organisation is caused. Therefore, every incident is taken seriously also in relation to the media.

When an incident raises media attention and thus is considered a high-profile incident, the ND assigns a co-worker to manage media attention and crisis communication. This person is part of the national CS team. Appropriate steps must be taken according to the [Crisis Communications Policy Support Document](#).

Some principles always apply:

- Crisis communication does not replace, direct or substitute any CS measure or process.
- In a crisis situation, the child always remains the focus of the CS process.
- We do not hide facts about CS incidents. We acknowledge that not being transparent potentially damages the organisation's reputation far more than an honest statement.
- Communication about a CS incident must be transparent both internally and externally. Not being transparent can damage our brand even more.
- CS focal persons are responsible for the CS process and communication teams are responsible for crisis communication. Close cooperation is strongly encouraged during crisis situations.

6. Appendices

Appendix 1

Profile of the national CS focal person

A CS focal person needs to be nominated at national level. This person is responsible for:

- Completing the local mapping at national level
- Maintaining the national CS risk register
- Coordinating the development and prioritization of national CS actions during the annual planning process.
- Coordinating activities in the area of awareness raising and prevention
- Following up on reported CS concerns and incidents together with the programme CS team
- Maintaining a National Child Safeguarding Incident Register
- Improving existing reporting and responding procedures

The position of the national CS focal person is reflected in the MA's organizational structure and its CS reporting and responding procedures. The CS focal person is a member of the national CS team.

A national CS focal person should fulfil the following requirements:

- At least 5 years of experience in the area of alternative care for children
- Commitment to the SOS CVI's vision and mission and to promoting the rights and well-being of children and young people from disadvantaged backgrounds
- Hands on experience in one of SOS CV's areas of programme interventions
- Team player with excellent communication skills and analytical ability
- Facilitation, negotiation, public-speaking and diplomatic skills
- Good coordination and organization skills, including ability to plan, organize and deliver results
- Ability to work under pressure to tight deadlines
- Ability to prioritize and handle a large amount of information
- Willingness to travel within the country

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Appendix 2

Key quality requirements for child safeguarding reporting and responding procedures in member associations

	Met	Not Met
1. Child safeguarding teams in all programmes and the national office are appointed.	<input type="checkbox"/>	<input type="checkbox"/>
2. A national CS focal person is appointed.	<input type="checkbox"/>	<input type="checkbox"/>
3. Children and young people's voices are heard to set and improve child safeguarding actions and measures on a programme level. This includes the possibility to report child safeguarding concerns or suggestions anonymously.	<input type="checkbox"/>	<input type="checkbox"/>
4. A CS risk assessment is conducted annually and included in the national CS risk register by the national CS focal person.	<input type="checkbox"/>	<input type="checkbox"/>
5. The local mapping exercise has been done and its findings are updated every 3 to 5 years or when there is significant change in the national child protection context.	<input type="checkbox"/>	<input type="checkbox"/>
6. The National Child Safeguarding Incident Register is established and maintained by the national CS focal person.	<input type="checkbox"/>	<input type="checkbox"/>
7. All reported CS incidents or concerns are registered in the National Child Safeguarding Incident Register.	<input type="checkbox"/>	<input type="checkbox"/>
8. Every reported CS incident or concern is carefully assessed and based on the results of the full incident assessment, an action plan including responsibilities and time frame is elaborated.	<input type="checkbox"/>	<input type="checkbox"/>
9. Every reported CS incident is reviewed regularly and the national CS focal person updates the National Child Safeguarding Incident Register with the findings and the planned next steps.	<input type="checkbox"/>	<input type="checkbox"/>
10. For all high-profile incidents, the national CS focal person shares the findings of every regular review in a status report with the IOR CS focal person.	<input type="checkbox"/>	<input type="checkbox"/>

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	Met	Not Met
11. Every CS incident that the MA has dealt with is closed by the responsible line manager by signing off a closure notice based on the recommendation of the respective CS focal person.	<input type="checkbox"/>	<input type="checkbox"/>
12. After closing a CS incident, a final report is prepared by the respective CS team. The national CS focal person inserts the final report into the National Child Safeguarding Incident Register.	<input type="checkbox"/>	<input type="checkbox"/>
13. The final summary containing the key findings and actions taken relating to the reporter's allegations is communicated back to him or her by the national CS focal person.	<input type="checkbox"/>	<input type="checkbox"/>
14. When an incident is closed, lessons learnt are collected to inform improvements in processes and practice as well as to identify future training needs.	<input type="checkbox"/>	<input type="checkbox"/>
15. The national director submits the annual CS report to the board.	<input type="checkbox"/>	<input type="checkbox"/>