

# WORKING TOGETHER TO PROTECT CHILDREN

Roles and responsibilities of the GSC in  
the reporting and responding process

March 2017 – Version 2.0

INTERNATIONAL POLICY SUPPORT DOCUMENT



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**WORKING TOGETHER TO PROTECT CHILDREN.  
ROLES AND RESPONSIBILITIES OF THE GSC IN THE REPORTING AND RESPONDING PROCESS**

**KEY USERS**

Mandatory for:	All SOS co-workers at the GSC, Management Council, International Senate
Recommended for:	All SOS co-workers, associates and partners at programme and national level

**RELATED POLICIES**

Basic policy:	Who we are
Core policy:	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's Villages
<a href="#">Child safety is everybody's business: Child safeguarding reporting and responding procedures in member associations</a>
<a href="#">SOS Children's Villages child safeguarding investigations</a>

**RESPONSIBLE FOR CONTENT**

Function:	International Competence Centre Programme & Strategy
Department:	Care and Child Safeguarding Team

**DEVELOPMENT PROCESS**

Approved by:	The Management Council
Development process:	Development of this document was initiated by the Programme & Strategy Competence Centre of the International Office. The process involved consulting with the Management Council, the Programme Audit Committee, child safeguarding focal persons of all International Offices Region and relevant functions of the International Office. International Directors of Regions (IDRs) were asked for input. Expert input has been provided via Keeping Children Safe.
Original language:	English
Intranet address:	<a href="https://collaboration.sos-kd.org/Workspaces/WS_000001/Wiki/Child%20safeguarding%20reporting%20and%20responding%20procedures%20in%20GSC.aspx">https://collaboration.sos-kd.org/Workspaces/WS_000001/Wiki/Child%20safeguarding%20reporting%20and%20responding%20procedures%20in%20GSC.aspx</a>

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**CHANGE HISTORY**

Version	Date	Changes
1.0	16.3.2015	Document approved by the Management Council
2.0	28.3.2017	Alignment of the document with the policy support document "Child safety is everybody's business: Child safeguarding reporting and responding procedures in member associations". Regular child safeguarding audits included.

**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

## WORKING TOGETHER TO PROTECT CHILDREN.

### ROLES AND RESPONSIBILITIES OF THE GSC IN THE REPORTING AND RESPONDING PROCESS

#### DEFINITIONS OF THE TERMS USED IN THE DOCUMENT

<b>Child protection</b>	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.
<b>Child safeguarding</b>	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.
<b>Child safeguarding incident</b>	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.
<b>Initial incident assessment</b>	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"><li>- Is there an immediate risk for the safety of the child and/or the reporter involved?</li><li>- Do the criteria for a high-profile incident apply?</li><li>- 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?</li></ul>
<b>Full incident assessment</b>	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.
<b>Child safeguarding investigation</b>	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.
<b>Reporter</b>	The person who reports a CS incident, concern, allegation or suspicion.

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## **Executive summary**

The SOS Children's Villages Child Protection Policy and the Code of Conduct require that all employees and associates report any child safeguarding (CS) concerns or incidents they are aware of, and that the organisation takes appropriate action in response.

This policy support document complements the "[Child safety is everybody's business. Child safeguarding reporting and responding procedures in member associations](#)" and "[SOS Children's Villages child safeguarding investigations](#)" and does not replace these existing documents.

### **The main purpose of this document is to:**

- Improve the support provided to member associations by the GSC.
- Enable every GSC office to define its own specific procedures including roles and responsibilities of the co-workers involved in dealing with child safeguarding (CS) incidents.
- Ensure appropriate responses and effective management of child safeguarding concerns and incidents at all levels of the organisation.
- Ensure thorough monitoring and accountability throughout the organisation.
- Define clear communication lines with regard to child safeguarding concerns and incidents within the organisation and towards external stakeholders.

### **For all CS reporting and responding processes the following principles apply:**

- The safety and welfare of the child always come first.
- Every co-worker has to report any child safeguarding concern or incident immediately.
- MAs are responsible for responding to child safeguarding incidents within the framework of the SOS Child Protection Policy and their national laws.
- The reporting and responding process is clear, effective and shaped according to international best practice. Co-workers know how and to whom to report and what the follow-up actions are.
- All reported child safeguarding incidents are dealt with professionally and confidentially in order to protect the child, the reporter, the respondent and the organisation. This also ensures a fair and proper process.

### **Required resources:**

SOS Children's Villages operates in widely differing political and social environments where the quality of local legal and child protection systems differs. In some countries, local authorities handle child protection incidents very well. In other countries, legal and child protection systems do not function adequately and SOS co-workers need to work through all the steps themselves in order to reduce further harm to affected children.

Thus, a full-time child safeguarding focal person is strongly recommended for regions where there are many countries with weak child protection systems.

## **1. 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 child safeguarding concern or incident is taken seriously and listened to carefully. We differentiate the following categories of CS incidents:

### **1.1 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 as our internal framework is always followed.

### **1.2 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.

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.

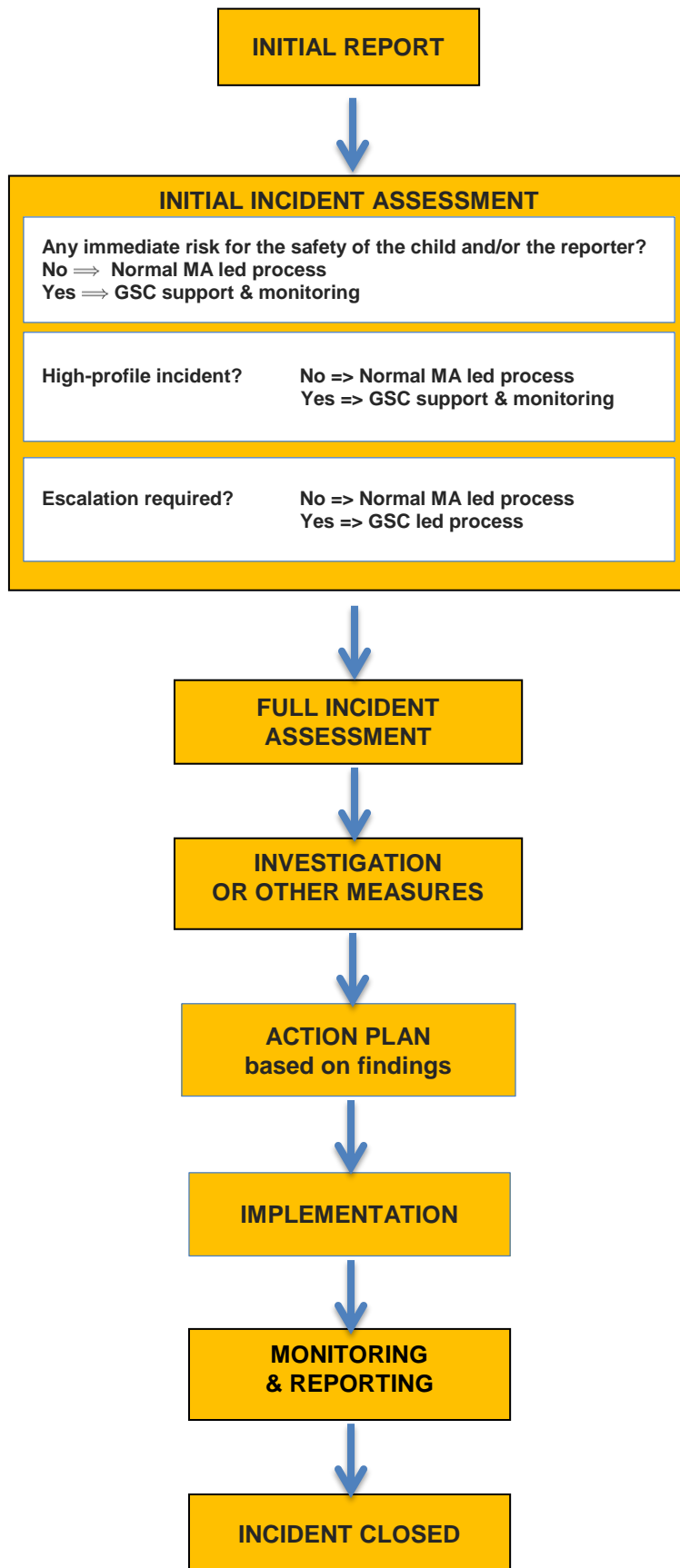
## **2. Nominating CS focal persons**

Every International Office Region (IOR) and International Office (IO) appoints a CS focal person who is responsible for:

- Coordinating the development and prioritization of regional CS actions during the annual planning process.
- Coordinating activities around CS awareness and prevention in the respective GSC office and relevant member associations
- Following up on reported CS concerns and incidents with the national CS focal persons in the relevant member associations
- Maintaining a Regional Child Safeguarding Incident Register (see chapter 3.2)
- Improving existing reporting and responding procedures in the respective GSC office and across the organisation

The position of the IOR CS focal person, IO CS focal person and related CS reporting and responding procedures are reflected in the organizational structure of the respective GSC office. Template of the job description of IOR CS focal person is provided in a separate document (Tool 1).

### 3. Reporting and responding process within the GSC





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### 3.1 Reporting

When a CS incident or concern is reported to a GSC co-worker, he or she shares it with the respective CS focal person within 24 hours. A template for the Initial Reporting Form is provided in a separate document (Tool 2).

- An incident or concern reported to the IOR of the MA where the child safeguarding incident happened is forwarded to the IOR CS focal person.
- An incident or concern reported to the IO is forwarded to the IO CS focal person. He or she shares this information with the respective IOR CS focal person.

An incident or concern involving also other areas of work (e.g. fraud, nepotism, mismanagement etc.) is shared by the relevant CS focal person with a responsible co-worker in the relevant GSC office. Together they co-ordinate further steps.

Any information on CS incidents or concerns can be sent confidentially to the GSC through a reporting form on the website of SOS Children's Villages International.

Each GSC office sets up its internal reporting and responding process. At all levels, it is the designated CS focal person who responds to any report on a child safeguarding incident.

#### 3.1.1 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.

#### 3.1.2 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.

### 3.2 Registration

Every child safeguarding concern or incident reported to a GSC office is registered in a child safeguarding incident register. This tool is used to monitor progress of GSC reported and high-profile incidents in each region.

Each IOR CS focal person maintains a **Regional Child Safeguarding Incident Register** about the following incidents:

- Child safeguarding incidents reported directly to the IOR or forwarded by the IO
- All high-profile incidents within the region

The IOR CS focal person in close co-operation with the IO CS focal person monitors that adequate actions are taken. The IOR CS focal person updates the information in the register regularly, at least after every incident review (see chapter 3.7) or according to important developments of the incident. Each IOR CS focal person can access its Regional Child Safeguarding Incident Register only.

The IO child safeguarding focal person maintains the **Global Child Safeguarding Incident Register**. This register includes all Regional Child Safeguarding Incident Registers as well as a section where incidents related directly to the IO are documented.

The template of the Child Safeguarding Incident Register is provided in a separate document (Tool 3).

#### 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

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only passing it on to those who really need to know. In case of CS incidents or concerns where the GSC gets involved, it is usually only the respective CS focal person who has 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

Every reported child safeguarding incident is initially assessed at the same level of the organisation where it was reported. The CS focal person looks into the following questions:

- 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?

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.

The initial incident assessment is done within 48 hours after having received the report, and all collected information is shared with the respective GSC office responsible for dealing with the incident further unless there is a conflict of interest. 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 led 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 child safeguarding response refers to situations where:

- An incident 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.

#### 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 risk 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

If the reported incident or concern relates to a specific member association or regional office and it was reported directly to the GSC, it is the respective IOR CS focal person in close consultation with the IO CS focal person who decides whether it is a high-profile incident or not. The IOR CS focal person informs then the respective IDR about the high-profile incident. The IDR can enquire about the incident assessment from the IOR CS focal person.

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If the reported incident is related to the IO, it is the IO CS focal person in close consultation with the Head of the Care and Child Safeguarding Team at the IO who decides whether it is a high-profile incident or not. The IO CS focal person informs then the COO about the incident. The COO can enquire about the incident assessment from the IO CS focal person.

Regarding incidents reported to the MA, it is the national CS focal person in close consultation with the IOR CS focal person who decides whether it is a high-profile incident or not. The IOR CS focal person notifies the IO CS focal person through a status report. At the same time, the IOR CS focal person informs the respective IDR. The template for the status report for high-profile child safeguarding incidents is provided in a separate document (Tool 4).

When an incident is identified as high-profile, the GSC always gets involved in a supportive and monitoring role. High-profile incidents are treated with priority and immediate actions are taken.

The IOR CS focal person informs the regional communications advisor about high-profile incidents which involve the media. If there is no regional communications advisor, the crisis communication advisor in the IO is informed. Also sponsor communications is informed where required.

### **3.4.3 Escalation**

When a conflict of interest is identified, the responsibility for dealing with the incident is escalated one organisational level up.

#### **Escalation from MA to IOR:**

- The decision to escalate an incident from the MA to the respective IOR is made by the IDR in consultation with the IOR CS focal person and the respective CVI representative. Based on the approval of the IDR, the GSC can proceed with a direct intervention. The IOR CS focal person informs the IO CS focal person about the decision.
- The accountability for dealing with the incident is brought back to the MA as soon as the reason for escalation is eliminated. The decision to return the incident back to the MA is made by the IDR in close consultation with the CVI representative based on regular incident reviews conducted by the IOR CS focal person.

#### **Escalation from IOR to IO:**

- The decision to escalate an incident from the IOR to the IO is made by the COO. The COO in consultation with the management team in the IO can escalate any incident for direct GSC intervention if one of the escalation criteria is met. Further steps are taken in cooperation with the respective IOR.
- The decision to return an incident escalated to the IO back to the IOR is made by the COO based on regular incident reviews conducted by the IO CS focal person.

### **3.4.4 Incidents with no conflict of interest**

When no conflict of interest is identified, the incident is referred to the adequate level to deal with it.

#### **Referral from IOR to MA:**

- The IOR CS focal person forwards the incident reported to the IOR or the IO to the respective MA and CVI representative.
- Once the incident is referred to the MA, the national CS focal person informs the IOR CS focal person on how the incident is handled, minimum after every regular review of the incident (see chapter 3.7). The IOR CS focal person inserts this information into the Regional Child Safeguarding Incident Register.
- For incidents originally reported to the IO, the IOR CS focal person additionally informs the IO CS focal person on how the incident is handled.
- If a GSC co-worker or an associate (external consultant etc.) hired by the GSC is reported as an alleged abuser of a child in direct SOS care, the incident is dealt with by the MA where the incident happened. The respective GSC office provides full support to the MA and receives regular updates on how the incident is handled.

#### **Incidents dealt with by the GSC:**

- If an IOR co-worker or an associate (external consultant etc.) hired by the IOR is reported as an alleged perpetrator against a child not in direct SOS care, the incident is handled directly by the IOR CS focal person. He or she keeps the IO CS focal person updated who in turn updates the COO and the International Director HROD.

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- If an IO co-worker or associate (external consultant etc.) hired by the IO is reported as an alleged abuser of a child not in direct SOS care, the incident is handled directly by the IO CS focal person. The COO and the International Director HROD receive regular updates on how the incident is handled.

### 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). Detailed information on the principles of the full incident assessment can be found in [Child safety is everybody's business. Child safeguarding reporting and responding procedures in member associations.](#)

A template for the full incident assessment is provided in a separate document (Tool 5).

#### 3.5.1 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.

A template for the action plan is provided in a separate document (Tool 6).

### 3.6 Actions implemented

For CS incidents dealt with by the IOR, the IDR needs to agree with the proposed actions and is responsible for their full and timely implementation. For CS incidents dealt with by the IO, the COO 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 Monitoring

#### 3.7.1 Regular incidents

Regular incidents are reviewed by the respective MA at least once per quarter. The review focusses on how the incident is dealt with, whether agreed actions are taken and information is shared with relevant co-workers. There is no GSC involvement.

#### 3.7.2 High-profile incidents

High-profile incidents are reviewed by the respective MA on an at least bi-weekly basis. The national CS focal person discusses the review with the IOR CS focal person (4-eye principle) who actively supports the review by bringing in questions from other GSC functions such as external communications, finance and sponsor communications in order to ensure that related information needs are addressed.

The IOR CS focal person updates the Regional Child Safeguarding Incident Register with the review results and the next steps. In addition, he or she assigns a colour rating to the incident and sends an updated status report to the IO CS focal person.

## **COLOUR RATING OF CS INCIDENTS**

### **GREEN**

The member association (MA) takes the lead, and all steps and processes as defined by 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.

### **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 by the SOS Child Protection Policy and related policy support documents 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.

As a follow-up, the IOR CS focal person meets monthly with the CVI representative to discuss the progress of the incidents. If there is a need to highlight any potential obstacles with the respective MA, the CVI representative contacts the national director with a view to unblock it. Any issues that cannot be solved, the CVI representative refers to the respective IDR with a set of recommendations. This may include a possible escalation of the incident to enable a direct GSC intervention.

### **3.7.3 Incidents involving GSC co-workers or associates**

Where the victim is a child not in direct SOS care, the incident is reviewed at least once per quarter by the CS focal person in the respective GSC office. Following the review, the relevant Child Safeguarding Incident Register is updated accordingly.

## **3.8 Incident closure**

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.

### **3.8.1 Final report**

Once the child safeguarding incident is closed, a final report is prepared by the respective CS focal person. He or she inserts the final report containing the key findings and related actions together with the closure notice into the Child Safeguarding Incident Register.

A template for the final report is provided in a separate document (Tool 7).

### **3.8.2 Information to the reporter**

Once the child safeguarding incident is closed, the final summary containing the key findings and actions taken relating to the reporter's allegations is communicated back to the reporter by the CS focal person at the level of the organisation where the child safeguarding concern or incident was initially reported. 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 actions.

### **3.8.3 Appealing against decisions and actions taken**

The reporter can appeal against the outcomes of the CS actions 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.

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If the reporter appeals to the IOR, the co-worker who receives the appeal shares it within 24 hours with the IOR CS focal person. The incident is explored further in consultation between the IOR CS focal person and the respective CVI rep and possible next steps are suggested to the IDR. At the same time, also the IO CS focal person is informed by the IOR CS focal person about the status of the appeal.

If the reporter appeals to the IO, the co-worker who receives the appeal shares it within 24 hours with the IO CS focal person. The incident is explored further in consultation between the IO CS focal person and the respective IOR CS focal person and possible next steps are suggested to the COO.

### 3.8.4 Independent child safeguarding review

If the reporter is not satisfied with how the incident was addressed, he or she can appeal against the outcomes of the child safeguarding actions. Also, disagreements between MA and GSC on procedures and/or outcomes of a child safeguarding investigation may occur. In order to address such controversial situations in case when all existing options for responding to the reported child safeguarding incident have been exhausted, an independent child safeguarding review process is established.

In case of receiving an appeal from the reporter against the outcomes of the child safeguarding actions taken by the organisation or continuing disagreement between MA and GSC, the situation is escalated one organisational level up.

- For incidents dealt with by member association, it is the ND who informs based on a consultation with the national CS focal person the IDR.

It is important to notice that the policy support document "[Child safety is everybody's business. Child safeguarding reporting and responding procedures in member associations](#)" recommends establishing National CS Ombuds body composed of three external experts nominated by the board. If the respective MA has established this National CS Ombuds body, the ND informs it about the appeal received from the reporter and the National CS Ombuds body reviews the process of handling the reported CS incident. National CS focal person then informs the IOR CS focal person about the status of the appeal.

- For incidents involving MA and IOR, it is the IDR who based on a consultation with the IOR CS focal person informs the COO.
- For incidents involving IOR and IO, it is the COO who based on a consultation with the IO CS focal person informs the CEO.

The responsible line manager, to whom the situation has been escalated, can decide to conduct an independent child safeguarding review. In such case, a team of three independent external child safeguarding experts with significant knowledge in the area of child safeguarding and child welfare is nominated. These experts must be free of any possible conflict of interest (e.g. existing contract with SOS Children's Villages).

The external experts review the whole process of how the respective child safeguarding incident has been handled by the organisation. 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.

In case when more information is needed to assess the process of handling the incident by the respective MA and/or GSC office (e.g. in case when recorded interviews with victims, witnesses and/or perpetrators are not available), the experts may need to contact individual victims, witnesses and/or perpetrators. Independent child safeguarding review process is not meant to re-investigate the incident and therefore, in such case the experts need to provide the commissioning line manager with a rationale for such decision.

After completing the independent child safeguarding review process, the external experts compile final report summarizing the review findings and their recommendation for further steps. This report is submitted to the commissioning line manager who decides about necessary actions to be taken by the organisation. Information about the decision is communicated back to the reporter and the respective MA and/or involved GSC offices.

## **4. Periodic reporting**

### **4.1 Reporting formats**

Every IOR CS focal person submits a report summarising all high-profile CS incidents in the respective region to the IDR on a quarterly basis.

Every IOR submits aggregated statistical CS report summarising number, nature and current status of all CS incidents reported in the respective region to the IO CS focal person on an annual basis, covering the period of January to December. IOR and MAs in the region define their internal reporting mechanisms together.

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 8).

In addition, every IOR CS focal person submits an annual narrative CS report summarising the child protection policy implementation status and the latest child safeguarding trends in the region to the IO CS focal person. The narrative report includes also an overview of child safeguarding audits conducted in the respective region (commissioned both by member associations and the IOR). For the child safeguarding audits, the following information is collected in the narrative report:

- 1) Percentage of programme locations where a CS audit was conducted
- 2) Key audit findings
- 3) Lessons learnt and actions taken to address the findings of the CS audits

The IO CS focal person submits a global report summarising the status-quo of all high-profile incidents to the COO on a quarterly basis. He or she also submits a global CS report summarising the child protection policy implementation status, latest child protection trends and the overall progress of reported incidents from January to December to the Management Council.

### **4.2 Improving the reporting and responding process**

SOS Children's Villages is implementing clear and effective CS reporting and responding procedures at all levels of the organisation. Part of the process is to monitor our activities in this area regularly and to improve our internal processes accordingly.

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 of the co-workers at different levels of the organisation. The lessons learnt are collected at the level of the organisation that dealt with the incident and inserted into the child safeguarding incident register.

In case of the CS incidents initially reported to the GSC and all high-profile incidents, the lessons learnt are shared with the respective IOR CS focal person. He or she then discusses the lessons learnt with the IDR and CVI representative to identify necessary actions to mitigate existing gaps in the CS reporting and responding process in the respective region. The IOR CS focal person also shares the report with the IO CS focal person.

#### **4.2.1 Internal child safeguarding audit**

The internal child safeguarding audit focuses on monitoring compliance with the Child Protection Policy and related policy support documents. At the same time, the audit is intended to provide recommendations and advice, support knowledge exchange and offer other services designed to add value and improve member associations' operations in the area of child safeguarding. A template for a child safeguarding audit is provided in a separate document (Tool 9).

To verify that the CS reporting and responding procedures are in place and well implemented, it is recommended to conduct internal child safeguarding audit in every programme location every 3 years at a minimum. The audit is conducted by the national office. It can be also included in the overall internal audit commissioned by the respective IOR. Every IOR keeps an overview on the status and outcomes of CS audits conducted in MAs in the respective region to collect learnings and to identify focus areas for further improvements within the region.

#### **4.2.2 External child safeguarding audit**

SOS Children's Villages International as a federation committed itself to go through an external certification process, in order to benchmark our child safeguarding efforts with international best practice and standards. It is recommended to conduct this external child safeguarding audit every 3 years at a minimum. The decision to conduct external child safeguarding audit is made by the Management Team at the International Office.

### **5. Crisis communication related to CS incidents**

Child safeguarding incidents have the potential to damage the reputation of the organisation. Therefore, appropriate steps must be taken according to the [Crisis Communications Policy Support Document](#).

Any private information (e.g. name, pictures, etc.) which could possibly reveal the identity of the child involved must not be published anywhere, not in incident papers, press releases, or other statements. The protection of the privacy of all children, young people and other people involved in the incident must always be ensured.

Some principles always apply:

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

#### **5.1 Incident papers**

The Crisis Communications Incident Paper is a tool for communicating internally about a pending crisis and is at times also used for child safeguarding incidents. The purpose of an incident paper is to ensure that co-workers are aware of the respective matter in case they are approached by the media or other external organisations. When an incident paper is related to a child safeguarding incident, the external communications co-worker needs to actively consult with the IOR CS focal person.



## 6. Appendices

### Appendix 1

#### Key quality requirements for child safeguarding reporting and responding procedures in the GSC

	Met	Not Met
1. A CS focal person is appointed in the respective GSC office (IORs and IO).	<input type="checkbox"/>	<input type="checkbox"/>
2. The Global Child Safeguarding Incident Register including all Regional Child Safeguarding Incident Registers is established and maintained by the respective CS focal person (IO and IORs).	<input type="checkbox"/>	<input type="checkbox"/>
3. Every child safeguarding concern or incident reported to a GSC office including related follow-up actions and relevant reports are registered in the Child safeguarding incident register by the respective CS focal person.	<input type="checkbox"/>	<input type="checkbox"/>
4. Every reported CS incident or concern is carefully assessed at the organisational level where the CS incident has been referred to. 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"/>
5. For all high-profile incidents, the IOR CS focal person shares the findings of every regular review in a status report with the IO CS focal person.	<input type="checkbox"/>	<input type="checkbox"/>
6. For all high-profile incidents which involve the media, the IOR CS focal person informs the regional communications advisor and sponsorship communications.	<input type="checkbox"/>	<input type="checkbox"/>
7. The IOR CS focal person meets monthly with the respective CVI representative to discuss the progress of the CS incidents registered in the Regional Child Safeguarding Incident Register.	<input type="checkbox"/>	<input type="checkbox"/>
8. Every CS incident that the GSC has directly 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"/>
9. After closing a CS incident, a final report is prepared by the respective CS focal person. He or she inserts the final report into the Child Safeguarding Incident Register.	<input type="checkbox"/>	<input type="checkbox"/>

**WORKING TOGETHER TO PROTECT CHILDREN.  
ROLES AND RESPONSIBILITIES OF THE GSC IN THE REPORTING AND RESPONDING PROCESS**

	<b>Met</b>	<b>Not Met</b>
10. 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 CS focal person at the level of the organisation where the child safeguarding concern or incident was initially reported.	<input type="checkbox"/>	<input type="checkbox"/>
11. In case of the CS incidents initially reported to the GSC and all high-profile incidents, the respective IOR CS focal person discusses the lessons learnt with the IDR and CVI representative to identify necessary actions to mitigate existing gaps in the CS reporting and responding process in the respective region.	<input type="checkbox"/>	<input type="checkbox"/>
12. Every IOR CS focal person submits a report summarising all high-profile CS incidents in the respective region to the IDR on a quarterly basis.	<input type="checkbox"/>	<input type="checkbox"/>
13. Every IOR CS focal person submits an annual CS report summarising the child protection policy implementation status and the latest child safeguarding trends in the region to the IO CS focal person.	<input type="checkbox"/>	<input type="checkbox"/>
14. The IO CS focal person submits a global report summarising the status-quo of all high-profile incidents to the COO on a quarterly basis.	<input type="checkbox"/>	<input type="checkbox"/>
15. IO CS focal person submits a global CS report summarising the child protection policy implementation status, latest child protection trends and the overall progress of reported incidents from January to December to the Management Council.	<input type="checkbox"/>	<input type="checkbox"/>
16. Every IOR keeps an overview on the status and outcomes of CS audits conducted in MAs in the respective region to collect learnings and to identify focus areas for further improvements within the region.	<input type="checkbox"/>	<input type="checkbox"/>
17. An external child safeguarding audit of the whole organisation is conducted every 3 years at a minimum.	<input type="checkbox"/>	<input type="checkbox"/>