

WORKING TOGETHER TO PROTECT CHILDREN

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

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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 staff at the GSC, Management Council, International Senate
Recommended for:	All SOS staff, associates and partners at programme and national level

RELATED POLICIES

Basic policy:	Who we are
Core policy:	Child Protection Policy SOS Care Promise 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
Child safety is everybody's business: Child safeguarding reporting and responding procedures in member associations
SOS Children's Villages child safeguarding investigations

RESPONSIBLE FOR CONTENT

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

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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.
3.0	6.5.2021	Alignment of the document with the policy support document “Child safety is everybody’s business: Child safeguarding reporting and responding procedures in member associations”. Lessons learned and inputs from internal and external reviews incorporated.

Major updates in the version 3.0 of the policy support document:

1. The policy support document now includes a specific requirement that the job description of all GSC staff is to include a specific reference to individual CS roles and responsibilities.
2. The definition of a child safeguarding incident has been aligned with the policy support document [“Child safety is everybody’s business. Child safeguarding reporting and responding procedures in member associations”](#).
3. The description of the CS incidents reporting platform and information flow towards selected stakeholders through CS incident papers has been added to the policy support document.
4. High-profile CS incidents were replaced with “CS incidents where the GSC gets involved” and the criteria are now aligned with the policy support document [Child safety is everybody’s business. Child safeguarding reporting and responding procedures in member associations](#).
5. Escalation criteria for the incident management within the GSC due to a potential conflict of interest have been clarified.
6. The description of external CS audits and the commitment to conduct external CS audit in case there are serious concerns about the implementation of the overall CS approach in a member association or GSC office and the organizational response to the reported CS incidents in the past has been added to the policy support document.

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ABBREVIATIONS USED IN THE DOCUMENT

COO	Chief Operating Officer
CS	Child safeguarding
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
MT	Management Team
ND	National Director

DEFINITIONS OF THE TERMS USED IN THE DOCUMENT

Associate	A person who works for SOS Children’s Villages on a contract basis (e.g. volunteers, consultants, staff outsourced from another company, etc.). The associate can be in direct contact with children supported by the SOS Children’s Villages’ programmes. It also includes caregivers providing formal alternative care in a community (e.g. foster parents) who signed a contract with SOS Children’s Villages on providing support services.
Child protection	Actions that individuals, organisations, countries and communities take to protect children from acts of maltreatment, abuse, neglect and exploitation, including domestic violence, child labour, commercial and sexual exploitation and abuse, HIV/AIDS, physical violence. It also describes the work organisations undertake in communities or programmes to protect children from the risk of harm due to the situation they live in.
Child safeguarding	All activities an organisation undertakes to ensure that its staff, 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 situation when a child is harmed as a result of action of SOS Children’s Villages’ staff, associates and/or operations or lack thereof. ¹ It includes physical abuse, sexual abuse, neglect and negligent treatment, emotional abuse and violation of children’s privacy. ²
Child safeguarding investigation	In order to confirm or reject an incident, 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.

¹ This includes situations when victims of child abuse and neglect do not receive necessary psychological support and remain vulnerable to further abuse or replicate abusive behaviour towards their peers. It also includes situations when abusive behaviour among children is not addressed by appropriate actions from the organisation, and when SOS staff fail to meet their duty of care obligations (e.g. no follow up actions on the incidents of abuse and neglect).

² Please refer to the SOS Child Protection Policy for a definition of the different forms of abuse,

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Need to know principle	<p>Information related to a reported CS incident is shared with different stakeholders depending on their role in the process of responding to the incident.</p> <ul style="list-style-type: none">- The line manager overseeing the incident management process and the CS focal person at the level of the organisation where the incident is being responded to have full access to the information about the incident.- Other staff receive specific information about the incident should they need it to fulfil their work-related tasks (e.g. HR manager receive information necessary for a disciplinary process).- All other stakeholders (e.g. reporter, GSC staff, PSAs etc.) receive anonymized information about the incident to protect the confidentiality of all persons involved.
Programme	<p>All the different types of programme interventions provided by a member association in one community or across communities. These services are tailored to the local context and continuously improved.³</p>
Reporter	<p>The person who reports a CS incident, concern, allegation or suspicion.</p>

³ See the SOS Care Promise, Commitment 2.

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Introduction

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:

- Clarify child safeguarding responsibilities of the individual GSC staff, functions and offices.
- 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 staff 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:

Child Centred Approach

- The safety and welfare of each child and young person always come first.
- Children and young people who experienced abuse are at the centre of our response. The protection and support to children and young people is paramount and cannot be downplayed or ignored because of protecting the organization and its staff. All children have equal rights to protection from harm, regardless of gender, sexual orientation, ethnicity, disability, or economic status.
- Children and young people are always listened to and taken seriously. 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.

Act on your concerns

- Every staff member, associate and partner has the responsibility to protect children from all forms of abuse, abandonment, exploitation, violence and discrimination.
- Every staff member has the responsibility to report any CS concern or incident immediately: **IF IN DOUBT, SPEAK OUT!**
- Every staff member has the responsibility to act without delay: Failure to act may place the child in further danger.

Timely and Appropriate Response

- All reported CS 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.
- The responding process is based on a thorough understanding and full recognition of the local context, including national laws and child protection system. Working together with other agencies, including statutory/national agencies for the protection of children is essential. However, it is important to assess potential risks associated with referring CS incidents for incident management to the external authorities. This includes situations where there are doubts about the integrity and/or competence of police or other agencies and therefore where referrals could lead to rights violations of the child or young person.⁴
- Confidentiality is ensured and information only shared on a 'need to know' basis.
- The reporting and responding process is clear, effective and shaped according to international best practice. This means that the staff know how and to whom to report and what the follow-up actions are.

⁴ Further, more detailed description of the overall CS risk assessment process is provided in a separate document.

1 Getting started

The reporting and responding processes described in this document apply to all offices of the General Secretariat⁵. In this regard, the SOS Child Protection Policy serves as our internal law.

1.1 Nominating CS focal persons and teams

Every International Office Region (IOR) and International Office (IO) defines clear, accessible, effective and safe mechanisms and channels for children, young people, staff and community members to report any CS incident, allegation or concern they may have.⁶ Information on how to report a CS incident is regularly shared with all staff, associates and partners as well as member associations.

1.1.1 International Office Region

Every International Office Region (IOR) assigns staff members who are in charge of dealing with child safeguarding issues.

The International Director of Region (IDR) is automatically chairing the IOR CS team. He or she has the ultimate responsibility for the implementation of the SOS Child Protection Policy in the respective region. Besides the IDR, the IOR CS team includes the IOR CS focal person and 2 to 3 members of the Regional Management Team (RMT). The members of the IOR CS team are appointed by the IDR.

CVI representatives and functional directors (e.g. PD director, HR director, FDC director etc.), who are not members of the IOR CS team, and other IOR staff members get involved upon the need.

The CS team is responsible for:

- Raising awareness on the SOS Child Protection Policy among the staff of the respective GSC office.
- Define overall strategy and specific actions for SOS Child Protection Policy implementation in the respective region as part of the annual planning process. This is done in consultation with member associations within CS networks. The actions are aimed to improve the child safeguarding work in the respective region (both IOR and MAs) along with the necessary resources to be allocated at the GSC. This is then taken up by the IDR as an input for the annual planning process.
- Support to different functions at the respective GSC office with an aim to prevent and mitigate possible CS risks. The responsibility to conduct CS risk assessment and implement appropriate risk mitigation actions remain anchored where it actually belongs, be it in Human Resources, Programme Development, External Communications, or Fund Development and Individual Giving. These functions drive these topics further. The IOR CS team does not take over responsibility for these topics. However, the IOR CS team maintains a CS risk register with an overview of the identified CS risks in different functions and relevant risk mitigation actions.
- Incident management of CS concerns and incidents related to the IOR staff and incident management responsibilities escalated from member associations.
- Follow up on the findings of the CS investigations commissioned by the respective IOR to ensure that findings of the investigations are acted upon including disciplinary and legal actions.
- Proactively identify MAs with high CS risk profile and recommend specific monitoring activities including conducting a CS audit.

The organizational structure of the respective GSC office includes a specific description of the IOR CS team and communication flow related to reported CS incidents. CS roles and responsibilities of the individual IOR staff members including the senior management are included in their job descriptions, and they are reflected in the annual performance appraisal process.

IOR CS focal person

The IDR appoints a CS focal person who is responsible for:

- Coordinating the development and prioritization of regional CS actions during the annual planning process in accordance with the regional strategy for the SOS Child Protection Policy implementation.
- Coordinating activities around CS awareness and prevention in the respective GSC office and relevant member associations
- Supporting incident management of reported CS concerns and incidents with the national CS focal

⁵ The CS reporting and responding procedures in MAs are described in the policy support document [Child safety is everybody's business. Child safeguarding reporting and responding procedures in member associations.](#)

⁶ For further details about the minimum requirements regarding reporting mechanisms and channels, see the chapter 3.1.

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persons in the relevant member associations. Where required, this is done with the support of the IOR CS team.

- Maintaining a Regional CS Incident Register (see chapter 3.2)
- Ensuring clear, accessible, safe and effective reporting and responding mechanisms and procedures in the respective GSC office and across the organisation.
- Regular reporting on the development in child safeguarding including reported CS incidents where the GSC gets involved to the IOR CS team. It is recommended that the IOR CS focal person provides this report to the IOR CS team at least on a quarterly basis.
- Facilitate the set-up, and support CS investigations commissioned by the IOR, monitor the implementation of the follow-up actions⁷

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, governmental authorities handle incidents of abuse and neglect of children and young people very well. In other countries, legal and child protection systems do not function adequately and SOS staff need to work through all the steps themselves in order to reduce further harm to affected children. Thus, **it is strongly recommended to appoint a full-time CS focal person at all International Office Regions** in order to ensure necessary support to member associations.

Template of the job description of IOR CS focal person is provided in a separate document.

1.1.2 International Office

The role of the International Office with regard to CS primarily involves coordination of the development of the organizational policies and procedures, support to the IORs and member associations (MAs) in the implementation of the policies, and monitoring the progress of the implementation. The IO CS team informs the Management Team (MT) and the governance bodies of the federation of the progress in the policy implementation and status of the CS incidents where the GSC gets involved (see chapter 2.1).

The organizational structure of the IO includes a specific description of the IO CS team⁸ and communication flow related to reported CS incidents. International directors of function (e.g. Programme and Strategy, HR, and FDC) and other IO staff members get involved upon the need. With regard to the CS incidents, the IO CS team reports to the COO. CS roles and responsibilities of the individual IO staff members including the senior management are included in their job descriptions, and they are reflected in the annual performance appraisal process.

For CS incidents where the GSC gets involved (see chapter 2.1) where the responsibility for monitoring or direct incident management remains at the IOR, the IO coordinates the information flow on these incidents towards relevant stakeholders in the federation. This is done through the online CS incidents' reporting platform (see chapter 2.1.4).

In case of CS incidents reported directly to the IO, the IO conducts incident assessment of the incident and then shares the report along with recommended further steps with the respective IOR, unless there is a conflict of interest on the level of the IOR. In such case, the responsibility for monitoring or direct incident management remains at the IO.

⁷ The key principles of CS investigations in SOS Children's Villages are described in the policy support document [SOS Children's Villages child safeguarding investigations](#).

⁸ The IO CS team ("Child Care and Safeguarding Team") is part of the Competence Centre Programme and Strategy and it reports to the Chief Operating Officer (COO). Ultimate responsibility for implementation of the Child Protection Policy and follow-up on reported CS incidents rests with the Management Team at the IO.

2 Definition of CS incidents

A CS incident is a situation when a child or young person is harmed⁹ as a result of action of SOS Children's Villages' staff, associates and/or operations or lack thereof.¹⁰ This includes also incidents that arise because of poor programme quality when a programme operates below acceptable conditions.¹¹

CS incident management is the primary responsibility of the respective member association. Where requested by the member association or when the criteria for the GSC involvement apply (see chapter 2.1), the GSC provides its incident management support and guidance.

Every reported CS incident is taken seriously and listened to carefully. When CS incidents occur, the victim's support is the first priority while appropriate corrective actions for practice improvements and/or disciplinary actions are being taken. CS incidents are reported to external welfare authorities and/or law enforcement authorities in accordance with the national law.

Detailed insight into this topic is included in separate documents.¹²

2.1 Incidents where the GSC gets involved

2.1.1 Incidents monitored by the GSC

The GSC monitors the response to reported CS incident if any of the following criteria is met:

- The alleged incident is related to sexual abuse and an SOS staff member is an alleged perpetrator.
- There is high government, donor or public interest, and/or media or the risk of it.
 - Incidents with high government interest include situations where the governmental authorities conduct their own investigation of the reported CS allegations within SOS programmes. This includes also incidents where the member association is accused of poor programme quality which led to incidents of abuse (institutional abuse).
With regard to incidents that receive high government interest, it is also important to consider further judicial process where the accused individuals are SOS staff and/or children and young people in direct SOS care. The judicial process can be a result of either governmental investigation or investigation commissioned by SOS Children's Villages.
 - Incidents with high donor interest include all incidents of abusive behaviour where the funding agreement between the donor and the member association includes a specific paragraph with reporting requirements on potential CS concerns and incidents (see the chapter 3.6.).
If the funding agreement does not include specific reporting requirements, we consider as incidents with potential high donor interest all CS incidents of abusive behaviour reported in a member association with IPD funding above 100,000 EUR provided by one donor.
 - Incidents with high public interest include all CS incidents where the MA and/or the GSC receive (e.g. based on media coverage or postings on social media) a number of calls, emails and other forms of communication where the members of the community are asking for clarification of the reported allegations and necessary mitigation actions. However, concrete situation must be assessed based on a case-by-case approach.

Member associations are required to proactively inform the respective IOR about these incidents. More detailed description of how member associations inform the GSC can be found in the chapter 2.1.4.

2.1.2 Incidents managed by the GSC

An incident where the incident management responsibilities have been escalated from the member association and managed directly by the GSC due to a conflict of interest (see the chapter 3.4) is also considered an incident where the GSC gets involved.

⁹ For a description of different forms of abuse, please refer to the SOS Child Protection Policy.

¹⁰ This includes CS incidents that happened as a direct consequence of situations when children with history of abuse and neglect do not receive necessary psychological support so they remain vulnerable to further abuse or they replicate abusive behaviour towards their peers and situations when abusive behaviour among children is not addressed by appropriate actions from the organisation. It also includes situations when SOS staff fail in keeping our 'duty of care' (e.g. no follow up actions on the incidents of abuse and neglect).

¹¹ Commonly, these incidents are referred to as institutional or programme abuse. These incidents are not necessarily perpetrated by staff.

¹² [How-to guide. Differentiating between adult-to-child expected, inappropriate, and abusive behaviours.](#)
[How-to guide. Differentiating between child-to-child normal, problematic, and abusive behaviours.](#)

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2.1.3 CS incidents in GSC run operations

CS incidents reported in operations run by the GSC (i.e. there is no national board) are assessed based on the same criteria included in the chapters 2.1.1 and 2.1.2 above.

2.1.4 CS incidents reporting platform

CS incidents where the GSC gets involved have the potential to impact beyond the national borders on the SOS Children's Villages Federation as a whole. For this reason, it is important to ensure that relevant stakeholders in the federation have appropriate information about CS incidents where the GSC gets involved. This is done through CS incident papers.

For CS incidents where the GSC gets involved in a monitoring role, the respective member associations are still in charge of the incident management. In this regard, the member associations are required to provide a CS incident paper to the respective IOR CS focal person who in turn informs the IOR CS team. This report is provided when the incident is reported or when there is progress in the management of the incident (e.g. CS investigation concluded, incident closure etc.). The IOR CS focal person then makes a quality crosscheck of the CS incident paper and submits it to the IO CS team for the upload to the platform. As a minimum, new version of the report is uploaded to the incident platform every 3 months.¹³ This applies until the CS incident has been closed.

For IOR managed incidents, the IOR CS focal person in consultation with other members of the IOR CS team develops the CS incident papers and then sends them to the IO CS team.

For the CS incident papers drafted by MAs and IORs, the IO CS team follows up with the respective IOR CS focal person on open questions or if updates are due.

For IO managed incidents, the IO CS team is responsible for the development of the CS incident papers. The IO CS team then shares the CS incident paper with the COO or assigned line manager in charge of the incident management before uploading the document to the platform.

The CS incident papers form the basis for the incident overview reports that are submitted to the MT regularly. It is also the basis for the MCO and PAC incident overview reports.

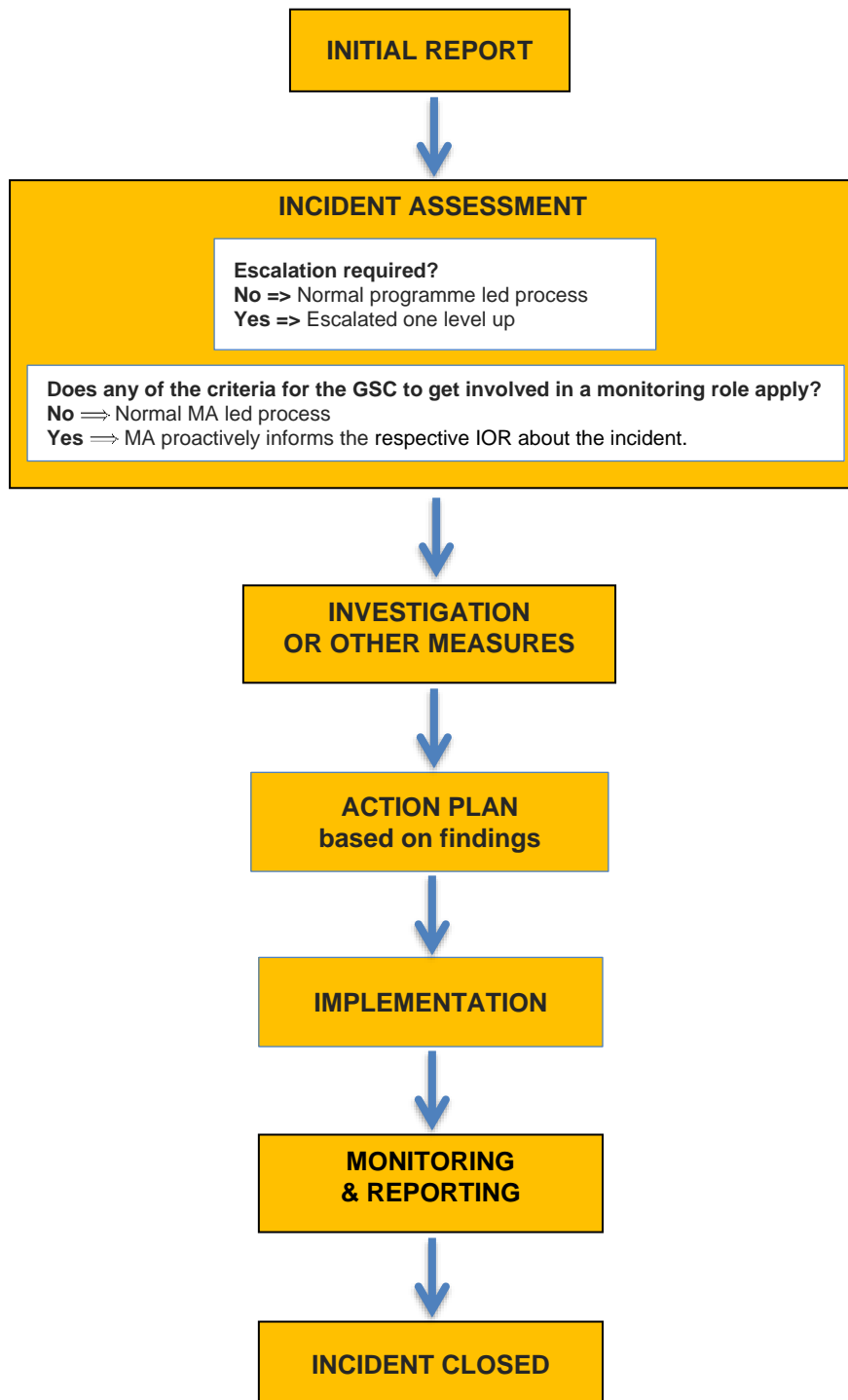
Line managers play an oversight role and should therefore provide feedback on quality and address gaps where appropriate. This oversight role of the respective line managers forms the necessary basis for a decisive organizational response to the reported CS concerns and incidents. The CS incident papers then represent a summary of the reported concerns, actions that have been taken in response and steps that are still pending.

All staff including the line manager are to follow the existing CS procedures with regard to the incident management. In this regard, it is important that the line managers are aware of the existing procedures and related requirements. It is the duty of the respective CS focal person to organize regular updates and refreshers to the line management at the respective GSC office.

A template for the CS incident paper is provided in a separate document.

¹³ Member associations are still required to provide monthly status reports as part of the regular review of the incident (see chapter 3.8)

3 Incident Management within the GSC



3.1 Reporting

All SOS staff are required to report CS incidents that they have learned about in the programme location to the programme CS team, unless it may cause harm to the whistle-blower or other individuals involved. If the reporting is not possible or the reporting within the programme location would put the whistle-blower or other individuals at risk, they must report the incident as soon as possible to the national CS focal person or any other member of the national CS team.

GSC staff members visiting a member association follow existing reporting procedures of the respective member association. At the same time, they inform the CS focal person in their office about the reported incident. If due to any reason the reporting at programme or national level is not possible, the GSC staff member informs the CS focal person in their office as soon as possible. This includes also a situation of a

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potential conflict of interest in the member association. A template for the Initial Reporting Form is provided in a separate document.

In case the allegations include a potential conflict of interest at the respective IOR, the GSC staff member can report the incident to the IO CS team via the online whistle-blowing channel or email address childsafeguarding@sos-kd.org.

Should a GSC staff member learn about a potential CS incident e.g. via email, phone, printed or social media etc., he or she is required to inform the CS focal person at the respective GSC office within 24 hours. Under no circumstances, the staff member should try to collect more information first or even investigate the situation on his or her own.

In case of an incident or concern involving also other areas of work (e.g. fraud, nepotism, mismanagement etc.), which was reported directly to the GSC, the CS focal person informs the responsible staff member at the relevant GSC office. Together they co-ordinate further steps. However, the CS focal person remains responsible only for the management of the specific CS-related aspects of the incident.

3.1.1 Reporting channels

Depending on the local legal, cultural and socio-economic background, and languages, every GSC office defines clear, accessible, effective and safe mechanisms, and channels for reporting CS incidents, be it reported by children, young people, community members, partners, associates, MA and GSC staff. As a minimum, the following options need to be in place:

- Face-to-face reporting to the members of the CS team
- Online whistleblowing channel on the [website of SOS Children's Villages International](#)
- Dedicated email address¹⁴

Anonymous reports submitted via online whistle-blowing channel, dedicated email address and other existing reporting channels are to be taken as seriously as 'named' reports, although the extent to which they can be investigated may be limited.

3.1.2 Failure to report and consequences

Every staff member must report any CS incident or concern they become aware of. This commitment is included in the employment contracts of all SOS staff and associates. Reports have to be made even if the identity of the perpetrator is unknown. Failure to report may result in disciplinary actions against the respective staff member or associate. All staff, associates and partners are 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 staff member, 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 staff member knowingly and wilfully makes a false report or gives false or malicious information regarding another staff member, disciplinary action is taken.¹⁵

3.2 Registration

Every CS incident reported is registered in a CS incident register. This tool is a key incident management tool to keep record and to monitor progress on all CS incidents reported directly to the GSC or escalated for direct incident management.

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

- CS incidents reported directly to the IOR or forwarded by the IO

¹⁴ Every IOR maintains email address child-safeguarding-xxx@sos-kd.org where "xxx" stands for the region (EUCM, ASIA, LAAM, WCNA, and ESAF). The CS team at the IO maintains the email address childsafeguarding@sos-kd.org.

¹⁵ In case of a former SOS staff member making knowingly and wilfully false or malicious reports, the respective GSC office takes appropriate legal steps in accordance with the national legislation.

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- All CS incidents within the region where the GSC gets involved in a monitoring role or they were escalated to the GSC for direct incident management

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 upload relevant documents for incident management and update the information in the register regularly, at least after every incident review (see chapter 3.8.) or according to important developments of the incident. Each IOR CS focal person can access its Regional CS Incident Register only.

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

The template of the CS Incident Register is provided in a separate document.

3.2.1 Confidentiality

All information relating to CS issues, including details about alleged victims, witnesses and alleged perpetrators is treated confidentially. This means handling information carefully and respectfully and only passing it on to those who really need to know. In case of CS incidents where the GSC gets involved, usually only the members of respective CS team 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 Incident assessment

Basic information is required to determine the exact nature of a CS incident and to decide on next steps. The CS team at the GSC office where the incident was initially reported answers the following questions:

1. 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 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.

2. Does any of the **criteria for the GSC to get involved** in a monitoring role apply?

The GSC monitors the response to reported CS incident if any of the following criteria is met:

- The alleged incident is related to sexual abuse and an SOS co-worker is an alleged perpetrator.
- There is high media coverage, donor, public and/or government interest or the risk of it.

For further description of the CS incidents where the GSC gets involved in a monitoring role or direct incident management, see chapter 2.1.

The incident assessment is done within 48 hours after having received the report. The team may also involve other staff members who are able to support the discussion and decision-making based on their knowledge and experience. This includes e.g. Human Resources, External Communications, or Fund Development and Individual Giving.

All collected information along with the outcomes of the incident assessment is summarised in the incident assessment form.¹⁶ All potential breaches of the national legislation and/or SOS Child Protection Policy, Sexual Misconduct Regulation, Code of Conduct and related child safeguarding procedures must be highlighted. The IOR CS focal person shares the document with the respective member association who will be further responsible for dealing with the incident further unless there is a conflict of interest, and uploads the document into the regional CS incident register.

If a CS incident related to a member association was first reported to the IO, the IO CS focal person shares the outcomes of the incident assessment with the IOR CS focal person who complements the findings and only then shares the document with the member association.

¹⁶ This incident assessment form is available in a separate document.

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If the IO CS team received an incident related to IOR, the IO CS focal person informs the COO about the incident and outcomes of the incident assessment. The COO may decide about the escalation of the incident management to the IO.

If the reported allegations involve GSC staff at the IO, the IO CS focal person informs the CEO about the incident and outcomes of the incident assessment. The CEO then decides about the next steps.

Should a conflict of interest be identified, similar principles for the escalation apply at any time during the process of dealing with the incident.

Outcomes of the incident assessment are not intended to verify or reject the incident, but serve as basis for planning next steps.

3.3.1 Incidents at programme (community) level involving GSC staff and associates

If a GSC staff member or an associate (external consultant etc.) hired by the GSC was reported as the alleged abuser of a child supported by SOS Children's Villages programme, 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 the progress of the incident management. The IDR has the duty to ensure that there is no conflict of interest on the side of the IOR which may influence the incident management within the MA.

Incidents where GSC staff member or an associate hired by the GSC was reported as the alleged abuser of a child or young person not supported by SOS Children's Villages programme are dealt with by the GSC office where the accused staff member or associate is employed.

3.4 Actions addressing the outcomes of the incident assessment

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

3.4.1 Conflict of interest

A conflict of interest occurs when the objectivity of an entity or individual becomes unreliable because of a clash between personal (or self-serving) interests and professional duties or responsibilities. If during the incident assessment the IOR CS team¹⁷ does not identify any conflict of interest at the member association, the IOR CS focal person shares the incident with the member association for further incident management. As a matter of priority, the MA takes care of the safety of the child and/or the whistle-blower involved in the incident.

The IOR CS focal person records the decision to share the incident with the respective MA along with related communication in the regional CS incident register.

3.4.2 GSC gets involved in a monitoring role

If any of the criteria for the GSC to get involved in a monitoring role (see chapter 2.1.1) applies, the IOR CS team who conducted the incident assessment shares the incident with the MA and informs the MA of the required information flow. This includes producing a CS incident paper and sharing monthly updates with the IOR. The IOR CS focal person also coordinates further follow-up with the respective functions at the IOR.

More detailed description of how member associations inform the GSC can be found in the chapter 2.1.4.

The same requirements regarding the information flow apply to the CS incidents involving IOR staff and were reported to the IO CS team.

3.4.3 Escalation

If the CS team at the GSC office where the incident was initially reported identifies a conflict of interest, the incident management responsibilities is escalated one organisational level up.

Escalation from MA to IOR:

- The decision to escalate incident management responsibilities from the MA to the respective IOR is made by the IDR in consultation with the IOR CS team 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.

¹⁷ If the incident was initially reported to the IO, the IO CS team is also involved in this incident assessment.

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- The COO in consultation with other members of the Management Team at the IO can escalate incident management responsibilities to the GSC if any of the escalation criteria is met. Further steps are taken in cooperation with the respective IOR.
- The accountability for incident management 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 IOR CS team and the respective CVI representative based on regular incident reviews conducted by the IOR CS focal person.

Escalation from IOR to IO:

- The decision to escalate incident management responsibilities from the IOR to the IO is made by the COO in consultation with other members of the Management Team at the IO.
- The decision to return the incident management responsibilities escalated to the IO back to the IOR is made by the COO in consultation with other members of the Management Team at the IO. The decision is based on regular incident reviews conducted by the IO CS focal person.

The responsibility for dealing with the reported CS incident escalated to the GSC for direct incident management should be brought back to the respective MA as soon as possible. The GSC only keeps the responsibility for the management of the incidents involving GSC staff and associates where the victim is a child or young person not supported by SOS Children's Villages programme. The incident management is then guided by the same principles as those stated in the policy support document "[Child safety is everybody's business. Child safeguarding reporting and responding procedures in member associations](#)".

3.5 Referral to the governmental authorities

[SOS Child Protection Policy](#) and the [policy support document on child safeguarding investigations](#) request that every incident where a crime has reportedly been committed is referred to the statutory authority or to the responsible agency in the country that have the authority to investigate such incidents.

The GSC office where the incident was referred to for incident management assesses a possibility of referring the incident to the relevant governmental authorities in the country where the incident allegedly happened. However, this decision needs serious consideration in countries/places where there are doubts about the integrity and/or competence of police or other agencies and therefore where referrals could lead to rights violations of the child or young person. This includes situations where children and young people (i.e. individuals below the age of majority) can be sentenced to a long stay in prison or even death for incidents related to their ethnic origin, religion, or sexual orientation.

Any decision not to report to police or other statutory authorities allegations that constitute a crime (e.g. sexual abuse) and that have been escalated to the GSC for direct incident management is recorded. The decision is taken by the IDR or the Management Team at the IO and it must clearly state the reasons for non-reporting to the authorities. This should be accompanied by an assessment highlighting any possible consequences of not doing so (for example, considering the welfare of the affected child, organisational reputation and any legal action that may result from not reporting the crime), as well as the risks of reporting the crime.

3.6 Communication with funding partners and donors

In specific cases, member associations have signed a contract with a funding partner or donor (governmental authority or development aid agency, funding PSA, corporate donor etc.) to inform them about reported CS incidents of abusive behaviour regardless of their nature. In case of a reported CS incident, it is the responsibility of the MA to inform the IOR about the incident and related reporting requirements to a funding partner and/or donor. The IOR then supports the MA in organizing further communication with the funding partner or donor related to the reported CS incident. At the same time, the IOR CS focal person informs the IO CS focal person about the incident. If the incident meets the criteria for CS incidents where the GSC gets involved (see chapter 2.1), the MA submits to the IOR more detailed information of the incident in a form of a CS incident paper (see chapter 2.1.4).

In the communication with funding partners and donors, it is important to maintain strict privacy and data protection requirements (see the need to know principle). As a general requirement, no personal information of the individuals involved in the reported incidents can be shared i.e., all reports provided to the funding partners and donors are to be anonymized.

3.7 Direct incident management by the GSC

Should the incident assessment identify a conflict of interest, the incident management responsibilities are escalated one organizational level up (see chapter 3.4.3). Respective GSC office is then responsible to manage the incident of child abuse in accordance with the requirements included in the SOS Child Protection Policy and related child safeguarding procedures. This includes either referral of the incident to the relevant governmental authority (see chapter 3.5) or commissioning a CS investigation.

If reporting to the governmental authorities is not an option, the GSC office commissions a CS investigation to collect more information of the incident. This happens in a situation when

- Reported CS incident is not of a criminal nature, i.e. it does not need to be reported to the external statutory authorities or to the responsible agencies.
- External statutory authorities or responsible agencies are unwilling or unable to do an investigation.

Depending on the situation, this can be organized as internal or external (i.e. led by non-SOS experts) investigation. All CS investigations are commissioned by the responsible line manager.

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

After concluding the investigation, the GSC office that commissioned the investigation together with the MA develop an action plan addressing the findings of the investigation. For further information, see the policy support document "[Child safety is everybody's business. Child safeguarding reporting and responding procedures in member associations](#)".

The implementation of the action plan is then a responsibility of the member association and the process is monitored by the respective IOR. The incident remains on the list of the CS incidents where the GSC gets involved (see chapter 2.1.4).

3.8 Regular review

For CS incidents that were initially reported to the GSC and then shared with the MA for further incident management i.e., the GSC is not involved anymore, MAs are not required to provide any further status reports to the GSC. They are only required to share the final report when the incident is closed (see chapter 3.9).

3.8.1 CS incidents where the GSC gets involved

Incidents where the GSC gets involved in a monitoring role are reviewed by the respective MA at least on a monthly basis.¹⁸ The focus of the review is on the implementation of the action plan jointly agreed by the respective GSC office and the member association (see chapter 3.7). Primary consideration is given to the support measures to the individuals who were victims of abuse, and implementation of the recommendations resulting of the CS investigation in terms of the identified gaps in the existing child safeguarding mechanisms in the respective programme and/or member association.

The national CS focal person shares with the IOR CS focal person an updated status report summarising the progress of the incident management since the previous review. Based on the status report, the national CS focal person discusses the development of the incident 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 then updates the Regional CS Incident Register with the review results and the next steps. In addition, he or she assigns a colour rating to the incident (see the chapter 3.8.3 below) and sends the updated status report to the IO CS focal person.

For the incidents where the incident management responsibilities have been escalated to the GSC, the status report is prepared by the IOR CS focal person based on the information provided by the respective MA. The IOR CS focal person then updates the Regional CS Incident Register accordingly and submits the status report to the IO CS focal person.

¹⁸ Should there be any important progress in the incident management, the MA reviews the development of the incident depending on the situation.

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The IO CS focal person informs the COO office of any significant progress in the management of the incident. In such case, the IO CS focal person also uploads updated status report to the CS Incidents Reporting Platform.

The status report is provided in a form of a CS incident paper (see chapter 2.1.4).

3.8.2 Incidents involving GSC staff or associates

In case of CS incidents where the victim is a child not supported by SOS Children's Villages programme and the alleged abuser is a GSC staff member or associate (e.g. consultant), the incident is reviewed at least once per quarter by the CS focal person in the respective GSC office. Following the review, the relevant CS Incident Register is updated accordingly.

3.8.3 Colour rating of CS incidents

As part of the regular review of the CS incidents where the GSC gets involved, the IOR CS focal person assigns a colour rating to every incident reported in the respective region. It is a simple and user-friendly way of informing the line manager at the respective IOR and other relevant stakeholders¹⁹ about the current status of the incident and the response taken by the member association.

The following criteria apply for the colour rating:

COLOUR RATING OF CS INCIDENTS

GREEN

The 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 staff 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 staff within the MA and the different levels of the GSC. The incident management responsibilities need to be escalated one level up.

If there is a need to highlight any potential obstacles with the respective MA, the IOR CS focal person informs the respective CVI rep. 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.

3.9 Incident closure

In accordance with the chapter 3.4.3, the responsibility for dealing with the reported CS incident escalated to the GSC for direct incident management should be brought back to the respective MA as soon as possible. The GSC only keeps the responsibility for the management of the incidents involving GSC staff and associates where the victim is a child or young person not supported by SOS Children's Villages programme. The incident management is then guided by the same principles as those stated in the policy support document "[Child safety is everybody's business. Child safeguarding reporting and responding procedures in member associations](#)".

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.

¹⁹ Management Team at the IO, Management Council, Programme Audit Committee of the International Senate.

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When an incident is closed, it is important to collect lessons learned to inform improvements in processes and practice as well as to identify future training needs of the staff at different levels of the organisation. The lessons learned are collected at the level of the organisation that dealt with the incident and inserted into the CS incident register.

In case of the CS incidents initially reported to the GSC and all CS incidents where the GSC gets involved, the lessons learned are shared with the respective IOR CS focal person. He or she then discusses the lessons learned 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.

3.9.1 Closure report

Once the CS incident is closed, the respective CS team prepares a final closure report containing the key findings and related actions together with the closure notice. The CS focal person inserts the final report into the CS Incident Register. The final report also includes a summary of the learnings from the incident management perspective including areas for further improvements.

With incidents where the GSC gets involved and incidents initially reported to the GSC and then forwarded by the IOR to the MA, the national CS focal person shares the final report with the IOR CS focal person. If needed, the IOR CS focal person can enquire about the incident closure from the national CS focal person.

A template for the final report is provided in a separate document.

3.9.2 Rehabilitation of the investigation subject in case of unconfirmed suspicion

Should the initial allegation not be substantiated, the investigation subjects have a right to request a letter from the commissioning line manager to confirm that they were cleared of all allegations. The letter is included in the personal file of the respective staff member. Where appropriate and requested by the investigation subject, the commissioning line manager informs staff and other relevant stakeholders (e.g. partner organisations, governmental authorities etc.) of the outcome.

3.9.3 Information to the reporter

Once the CS incident is closed, the CS focal person at the level of the organisation where the CS concern or incident was initially reported communicates a summary of the key findings and actions taken relating to the reporter's allegations back to the whistle-blower. No information is shared that may compromise the privacy and personal data of the persons involved. The reporter is also informed about the option to appeal against the outcomes of the CS actions. Should the reporter be a child, he or she is informed about the response outcomes in a confidential and age-appropriate way.

3.9.4 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 their complaint or concerns were addressed.

If the reporter appeals to the IOR, the staff member 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 team and the respective CVI representative. The IDR then decides about further actions. At the same time, the IOR CS focal person informs the IO CS focal person about the status of the appeal.

If the reporter appeals to the IO, the staff member 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 team and the respective IOR CS focal person and possible next steps are suggested to the COO.

A CS investigation will not be opened again during an appeal. The focus of the appeal is on a review of the incident management process and whether the incident management quality requirements were met. Only when during the appeal fundamental flaws are identified, the incident be opened up again. If the GSC office who deals with the appeal is satisfied with how the incident was handled, the person who lodged the appeal is informed accordingly.

If necessary, the line manager in charge of dealing with the appeal can ask for an independent audit of the whole incident management process. This does not mean that the incident is re-opened. The focus of the audit is on the incident management to determine whether the requirements were met.

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The person who lodged the appeal is informed of other avenues open to them, e.g. legal options, should he or she not be satisfied. However, the incident is closed for SOS Children's Villages.

4 Monitoring of the implementation of the overall CS approach

The GSC plays a crucial role in the monitoring of the implementation of the overall CS approach, defined by the SOS Child Protection Policy and related CS procedures, by individual members associations and different GSC offices. Based on the findings, the GSC then implements specific support activities and projects focused on strengthening the implementation of the overall CS approach in individual member associations, regions or even globally within the whole Federation.

4.1 CS annual survey

Individual MAs submit to the respective IOR information on their progress in the implementation of the minimum CS requirements as defined by the SOS Child Protection Policy and related child safeguarding procedures, and information on reported and later confirmed CS incidents. This is done through a CS annual survey, which is a self-assessment tool covering the period of January to December.

The IOR CS focal person compiles regional summary of the statistics provided by individual MAs. Based on these statistics and additional qualitative information²⁰, the IOR CS focal person then prepares narrative annual CS report covering the period of January to December and submits the report to the IDR. The report includes analysis of the recent progress of the member associations in the region with regard to the implementation of the overall child safeguarding approach as well as lessons learned from the CS incidents that the MAs in the region have dealt with in the past year. Once the IDR approves the report, the IOR CS focal person submits the report to the IO CS focal person.

The IO CS team drafts a global CS annual report and submits the report to the Management Team at the IO and governance bodies of the federation including the Programme Audit Committee of the International Senate.

4.2 CS audits

CS audits focus on monitoring compliance with the Child Protection Policy and related policy support documents. Particular attention is paid to the incident management. The audit is also 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.

4.2.1 Internal child safeguarding audits

To verify that the CS reporting and responding procedures are in place and that incident management requirements are met, it is required to conduct internal CS 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. Templates for a CS audit along with a guiding methodology is provided in separate documents.

MAs share proactively with the respective IOR collected learnings and identified focus areas for further improvements. This information is one of the major inputs to the annual planning process of CS actions by the respective IOR. Depending on the number of audits conducted by individual member associations, the summary is provided at least once a year. A template of a summary of the key learnings and suggestions for further improvements resulting from a CS audit is provided in a separate document.

Besides the CS audits conducted in member associations, it is also important to review the implementation of the child safeguarding reporting and responding procedures at the GSC. It is therefore recommended to conduct internal CS audit in every GSC office, be it IOR and IO, every 3 years. This audit is conducted by SOS staff from another GSC office. Where possible, this audit can be conducted as an independent external CS audit (see chapter 4.2.2). The audit is commissioned by the COO, in case of IORs it is commissioned jointly with the respective IDR.

4.2.2 External child safeguarding audits

In order to increase transparency and ensure independent review of the CS work at all levels of the federation, SOS Children's Villages International is committed to commission independent external CS audits

²⁰ This includes e.g. examples of good practise in terms of raising awareness and capacity building, learnings on incident management, joint projects with partner organizations or governmental authorities etc.

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in case there are serious concerns about the implementation of the overall CS approach in a member association or GSC office and the organizational response to the reported CS incidents in the past.

The audit can be also requested by a PSA or external partner. In such cases, the audit is also commissioned by the GSC.

The focus of the audit is to review the organizational response to the incident and identify learnings that will inform further improvements of the existing policies and procedures. The decision to conduct such external CS audit is made by the IDR or the Management Team at the International Office.

The audit is conducted by external experts with significant knowledge in the area of child safeguarding and child protection. These experts must be free of any possible conflict of interest (e.g. existing contract with SOS Children's Villages). The costs associated with the audit are covered by the commissioning GSC office or the PSA who requested the audit.

5 Communication about CS incidents

Any communication about CS incidents must be undertaken with extreme care to minimize potential risks.

Any private information (e.g. name, pictures, etc.) which could possibly reveal the identity of the child involved or alleged perpetrator 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:

- 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 CS process.
- Communication about the incident must be transparent both internally and externally, within the boundaries of respecting individuals' privacy. Our reputation is founded on openness and swift response to incidents that place the child's interests first.
- CS focal persons are responsible for the CS process, and communication teams are responsible for preparations for the possibility of communication with external parties, such as the media. Close cooperation is strongly encouraged during crisis situations in which there is external interest.
- All external communications about alleged wrongdoing are guided by the four C's principle: Contrition, Control, Commitment and Context. The sequence is essential: First and foremost, we express our contrition and repentance. Secondly we demonstrate that we are in control of the facts, or doing our utmost to get the full overview. Thirdly, we commit to take necessary action to do justice and support victims. Only after these points have been made, can we comment on the context – the actions we already have taken and the external environment – being very careful not to present these as excuses.

Please see Section 3.6 regarding communicating with external partners.

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Annexes

Annex 1

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

	Met	Not Met
1. A full time CS focal person is appointed in the respective GSC office (IORs and IO).	<input type="checkbox"/>	<input type="checkbox"/>
2. A CS team is established in the respective GSC office (IORs and IO).	<input type="checkbox"/>	<input type="checkbox"/>
3. The Global CS Incident Register including all Regional CS Incident Registers is established and maintained by the respective CS focal person (IO and IORs).	<input type="checkbox"/>	<input type="checkbox"/>
4. Every CS concern or incident reported to a GSC office including related follow-up actions and relevant reports are registered in the CS incident register by the respective CS focal person.	<input type="checkbox"/>	<input type="checkbox"/>
5. Every reported CS incident or concern is carefully assessed at the organisational level where the CS incident has been referred to.	<input type="checkbox"/>	<input type="checkbox"/>
6. For all CS incidents where the GSC gets involved which involve the media, the CS focal person informs the communications advisor and sponsorship communications at the respective GSC office.	<input type="checkbox"/>	<input type="checkbox"/>
7. For all CS incidents involving GSC staff or associates, the CS focal person informs the Human Resources Team at the respective GSC office.	<input type="checkbox"/>	<input type="checkbox"/>
8. For all CS incidents where the GSC gets involved, 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"/>
9. The IOR CS focal person informs the respective CVI representative about any potential obstacles with the respective MA related to CS incidents where the GSC gets involved.	<input type="checkbox"/>	<input type="checkbox"/>
10. 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"/>

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	Met	Not Met
11. 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 CS Incident Register.	<input type="checkbox"/>	<input type="checkbox"/>
12. 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 CS concern or incident was initially reported.	<input type="checkbox"/>	<input type="checkbox"/>
13. In case of the CS incidents initially reported to the GSC and all CS incidents where the GSC gets involved, the respective IOR CS focal person discusses the lessons learned with the IOR CS team 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"/>
14. Every IOR CS focal person submits a report summarising all CS incidents where the GSC gets involved in the respective region to the IDR on a quarterly basis.	<input type="checkbox"/>	<input type="checkbox"/>
15. The IO CS focal person submits a global report summarising the status-quo of all CS incidents where the GSC gets involved to the COO depending on the progress of the situation, but minimum on a quarterly basis.	<input type="checkbox"/>	<input type="checkbox"/>
16. Every IOR CS focal person submits an annual CS report summarising the SOS Child Protection Policy implementation status and the latest CS trends in the region to the IO CS focal person.	<input type="checkbox"/>	<input type="checkbox"/>
17. IO CS focal person submits a global CS report summarising the SOS Child Protection Policy implementation status, latest child protection trends and the overall progress of incidents from January to December to the Management Team at the IO and the governance bodies of the federation.	<input type="checkbox"/>	<input type="checkbox"/>
18. 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"/>
19. The GSC commissions an external CS audit in case there are serious concerns about the implementation of the overall CS approach in a member association or GSC office and the organizational response to the reported CS incidents in the past.	<input type="checkbox"/>	<input type="checkbox"/>

Annex 2
GSC services related to incident management

