

801-01: Bilaga

# Barnfonden Child Safeguarding Procedures

## (to accompany the Child Safeguarding Policy)

---

- Last updated October 2018, Martina Hibell
- Approved by Barnfonden’s Board: 2019-06-11

### Table of Contents

Table of Contents .....	1
1 Introduction.....	3
1.1 Intent .....	3
1.2 Scope.....	3
1.3 Definitions.....	3
2 Recruitment of Staff, Volunteers and Interns .....	3
2.1 Staff and Board members.....	3
2.1.1 Interview Questions .....	3
2.1.2 Criminal Record Checks .....	4
2.1.3 Verbal Reference Checks.....	4
2.1.4 Employment History Check.....	4
2.1.5 Code of Conduct .....	4
2.2 Volunteers, Ambassadors, Interns and Contractors .....	4
2.2.1 Interview Questions .....	4
2.2.2 Criminal Record Checks .....	4
2.2.3 Verbal Reference Checks.....	5
2.2.4 Employment History Check.....	5
2.2.5 Code of Conduct .....	5
3 Education and Training.....	5
3.1 Induction .....	5
3.2 Refresher Training .....	5
4 Partnerships.....	6
4.1 Program Implementing Partners .....	6
4.2 Individual Consultants .....	6
4.2.1 Criminal Record Checks .....	6
4.2.2 Verbal Reference Checks.....	7
4.2.3 Employment History Check.....	7
4.2.4 Code of Conduct .....	7

5	Sponsor Relations .....	7
5.1	Welcome and Induction .....	7
5.2	Monitoring of all Correspondence .....	7
5.3	Sharing Identifying Information .....	7
5.4	Sponsor Visits .....	8
5.4.1	Sponsors Visiting ChildFund Alliance/ Plan BØRNEfonden Managed Countries .....	8
5.5	Conducting a Visit .....	9
5.6	Donor Organisations and Ambassador Visits .....	9
6	Project Risk Assessment and Management.....	9
6.1	Project Planning and Design .....	10
6.1.1	Factors to Consider in Identifying Risks.....	10
6.1.2	Determining Likelihood and Impact .....	11
6.2	Project Implementation .....	11
6.3	Project Monitoring and Evaluation .....	11
7	Humanitarian Emergencies .....	11
8	Marketing and Communications .....	12
8.1	Protecting Children’s Personal Details .....	12
8.2	Communications and Reporting on Children.....	12
9	Raising Concerns and Incidents .....	12
9.1	Obligation to Raise Concerns .....	12
9.2	Concerns and Incidents that must be raised .....	13
9.3	How to Raise Concerns.....	13
10	Investigating and Responding to Concerns.....	14
10.1	Documenting Concerns.....	14
10.2	Child Safeguarding Register .....	14
10.3	Investigations .....	14
10.3.1	The Best Interests of the Child.....	15
10.4	Responding .....	15
10.4.1	Deciding to Contact Police .....	15
10.4.2	Engaging Support Services .....	15
10.4.3	Considering Personal Security .....	15
10.4.4	Tips for Receiving a Disclosure.....	15
	Annex 1: Screening Requirements Matrix .....	16
	Annex 2: Template Character Reference – where overseas police check unavailable .....	18
	Annex 3: Code of Conduct.....	19
	Annex 4: Child Safeguarding Values for Sponsors .....	22
	Annex 5: Behavioural Expectations for Sponsor Visits.....	23

# 1 Introduction

## 1.1 Intent

Barnfonden is committed to a global community where children are safe and have the opportunity to reach their full potential.

The *Child Safeguarding Policy* broadly outlines the steps we take in our work and with our people, to ensure we do no harm to children.

The *Child Safeguarding Procedures* describes the practical actions we perform to apply the policy. The *Procedures* outline Barnfonden practice, which are in line with the requirements of the ChildFund Alliance Child Safeguarding Policy Guidelines.

A Child Safeguarding Focal Point is to be appointed from within the Barnfonden staff. This person is to be specifically trained in child safeguarding. Note that responsibility for the implementation of policies and procedures rests with all staff, led by the CEO and Senior Management.

## 1.2 Scope

The *Child Safeguarding Procedures* cover Barnfonden management in Sweden. It also outlines the expectations that Barnfonden has of contractors, consultants, and partner organisations.

Barnfonden, as a child focused development organisation, recognises that the safeguarding of children is the responsibility of all staff, board members, contractors, consultants, volunteers, interns, Barnfonden ambassadors and sponsors engaged with the organisation.

Barnfonden acknowledges that the laws and operating contexts for child safeguarding differ across countries. At a minimum, we will comply with the laws in Sweden (including extra-territorial laws) and the laws in countries where we operate. However, our policy and procedures also sometimes go beyond local laws, with more rigorous expectations.

## 1.3 Definitions

The definitions covered in the *Child Safeguarding Policy* also apply to the *Procedures*.

# 2 Recruitment of Staff, Volunteers and Interns

Barnfonden is committed to ensuring our people do not pose an unacceptable risk to children. We consistently apply strict procedures in the recruitment and screening of all staff, volunteers, and interns. The procedures outlined here align with our *Human Resources Policy*. A summary of Barnfonden's safeguarding recruitment procedures can be found in [Annex 1](#).

## 2.1 Staff and Board members

### 2.1.1 Interview Questions

Behavioural-based interview questions are used by a selection panel to assist in assessing all candidates. These questions ask candidates to respond to a hypothetical situation related to child safeguarding and assess the appropriateness of their response. Written notes will be stored on file. Barnfonden is child-

focused development organisations so all staff are expected to have an understanding of child safeguarding.

### 2.1.2 Criminal Record Checks

Police criminal record checks (police checks) will be requested for all staff before employment is confirmed, and updated every three years thereafter. Barnfonden will inform all applicants of this requirement during the recruitment process. The CEO is responsible for checking and returning the criminal record, and to store a checklist on file.

As police checks can take time, on occasion Barnfonden may offer employment, provisional on the result of the check.

For applicants who have lived overseas for longer than a twelve-month period during the last five years, a criminal record check from that country will also be required. However, it may be impossible to obtain a reliable criminal record check for some countries. In such cases, a signed character reference from a suitable senior community representative or previous employer in that country is an acceptable alternative. Identifying the appropriate referee will be at the discretion of the ChildFund CEO (see [Annex 2](#) for a template character reference).

Criminal Record (Police) Check procedures are also undertaken for Board Members.

Criminal Record (Police) Checks shall be requested every three years.

### 2.1.3 Verbal Reference Checks

At least two reference checks will be conducted by phone for all applicants, with written notes stored on file. Referees will be asked about the applicant's work in relation to children and child safeguarding issues. Further references may be requested when inaccuracies or concerns are noted.

### 2.1.4 Employment History Check

All applicants will have their work history closely checked. Any gaps in employment history should be explored with questions in the interview. Supporting documentation can be requested when inaccuracies or concerns are noted.

### 2.1.5 Code of Conduct

Staff and Board Members must sign and agree to follow the *Code of Conduct* ([Annex 3](#)) before employment is confirmed.

## 2.2 Volunteers, Ambassadors, Interns and Contractors

### 2.2.1 Interview Questions

When contact with children or access to their personal information will be part of their role, behavioural-based interview questions will be used to assist in assessing all candidates. These questions ask candidates to respond to a hypothetical situation related to child safeguarding and assess the appropriateness of their response. Written notes will be stored on file.

Behavioural interview questions may not be used when contact with children is not part of their role. However, Barnfonden is a child-focused organisation so we will consider child safeguarding carefully during the engagement process for all volunteers, ambassadors interns and contractors.

### 2.2.2 Criminal Record Checks

When contact with children or children's personal details (contact information, photos, etc) will be part of their role, criminal record checks (police checks) will be requested for all volunteers and interns

before engagement is confirmed. Barnfonden will inform all applicants of this requirement during the recruitment process. The CEO is responsible for checking and returning the criminal record, and to store a checklist on file.

As criminal record checks can take time, on occasion Barnfonden may offer engagement, provisional on the result of the check.

For applicants who have lived overseas for longer than a twelve-month period during the last five years, a criminal record check from that country will also be required.

It may be impossible to obtain a reliable criminal record check in some countries. In this case, a signed declaration or character reference from a suitable senior community representative in that country is an acceptable alternative. Identifying the appropriate referee will be at the discretion of the CEO (see [Annex 2](#) for a template character reference).

Criminal Record (Police) Checks shall be requested every three years.

### 2.2.3 Verbal Reference Checks

When contact with children will be part of their work, at least two reference checks will be conducted by phone for all applicants, with written notes stored on file. One referee may be an educational institution. Referees will be asked about the applicant's work in relation to children and child safeguarding issues. Reference checks will not be used for volunteers and interns when they will not have contact with children as part of their role.

### 2.2.4 Employment History Check

All applicants will have their work history closely checked. Any gaps in employment history should be explored with questions in the interview. Supporting documentation can be requested when inaccuracies or concerns are noted.

### 2.2.5 Code of Conduct

Volunteers and interns must sign and agree to follow the *Code of Conduct* ([Annex 3](#)) before a position is confirmed.

## 3 Education and Training

### 3.1 Induction

Every new staff member undergoes an induction session during on-boarding that includes information about the *Child Safeguarding Policy, Procedures* and *Code of Conduct*. This is conducted by the Child Safeguarding Focal Point.

Volunteers, interns and contractors receive child safeguarding induction training relevant to their position from their line manager, in consultation with the Child Safeguarding Focal Point.

### 3.2 Refresher Training

Refresher training is provided at least once every two years for all staff in Malmö. All training materials, including the attendance lists, are documented and filed with the CEO in Malmö.

## 4 Partnerships

Barnfonden works in partnership with a range of suppliers and contractors, consultants and partner organisations. This section outlines the conditions related to child safeguarding under which we engage in these partnerships.

### 4.1 Program Implementing Partners

Barnfonden's global programming partners are ChildFund International, Plan BØRNEfonden and ChildFund Australia. Selected ChildFund International, Plan BØRNEfonden and ChildFund Australia National Offices are partners in the delivery of Barnfonden projects and are governed respectively by the ChildFund International, Plan BØRNEfonden and ChildFund Australia child safeguarding policies and related procedures. These have been assessed as corresponding with Barnfonden's policy and procedures.

All international partner organisations should have their own child safeguarding policy and procedures in place. Barnfonden will assess whether the following conditions are met:

- Current child safeguarding policy in local language in place
- Robust recruitment (including criminal record checks),
- Records that child safeguarding training is conducted for staff
- A code of conduct and stated consequences for a breach
- Reporting procedures
- Risk management procedures
- Commitment to regularly review the policy

When adequate policy and procedures are not in place at the beginning of a partnership, Barnfonden will provide capacity development support so that this requirement is met within six months of engagement.

### 4.2 Individual Consultants

When Barnfonden engages individual consultants, who will have contact with children or access to their personal information, the following procedures must be followed:

#### 4.2.1 Criminal Record Checks

Criminal record checks (police checks) will be conducted for all individual consultants who will have contact with children or access to their personal information before engagement is confirmed. An existing criminal record check that is less than two years old may be accepted. Barnfonden will inform individuals of this requirement during the engagement process. The CEO is responsible for checking and returning the criminal record, and to store a checklist on file.

As criminal record checks can take time, on occasion Barnfonden may engage individuals provisional on the result of the check.

For individuals who have lived overseas for longer than a twelve-month period during the last five years, a criminal record check from that country will also be required.

It may be impossible to obtain a reliable criminal record check in some countries. In this case, a signed declaration or character reference from a suitable senior community representative in that country is an

acceptable alternative. Identifying the appropriate referee will be at the discretion of the CEO (see [Annex 2](#) for a template character reference).

#### 4.2.2 Verbal Reference Checks

At least two reference checks will be conducted by phone for all individual consultants, with written notes stored on file. Referees will be asked about the individual's work in relation to children and child safeguarding issues. Further references may be requested when inaccuracies or concerns are noted.

#### 4.2.3 Employment History Check

All individual consultants will have their work history closely checked. Any gaps should be explored with questions in the interview. Supporting documentation can be requested when inaccuracies or concerns are noted.

#### 4.2.4 Code of Conduct

Individual contractors must sign and agree to follow the *Code of Conduct* ([Annex 3](#)) throughout their contact before engagement is confirmed.

## 5 Sponsor Relations

Barnfonden has an active sponsor relations programme and encourages communication between sponsors, and the communities and children we support. This communication has the potential to positively impact on the development of the child/sponsor relationship and the cultural education and awareness of the sponsor, child and community. This communication commonly occurs through mediated letters and sponsor visits to the child and community.

To ensure that children are not at risk of unapproved, unmediated, or inappropriate contact with sponsors, a range of risk identification and mitigation strategies are in place.

### 5.1 Welcome and Induction

All sponsors receive a Welcome Pack that provides information about the nature of the relationship between sponsor and sponsored child or community. All sponsors will also receive a copy of the *Child Safeguarding Values for Sponsors* (see [Annex 4](#)).

### 5.2 Monitoring of all Correspondence

All correspondence between sponsors and children are vetted by ChildFund/ Plan BØRNEfonden Country Offices to ensure it is appropriate and respectful.

Correspondence between child and sponsors must not disclose children's or sponsor's home addresses.

No direct, unmediated contact between children or families and sponsors is permitted. This includes contact by phone or digital contact, including through social media as these forms of communication place both children and sponsors at risk. (see also the *Social Media Guidelines* for more detail).

### 5.3 Sharing Identifying Information

Barnfonden recognises that sponsors may wish to promote the work of Barnfonden, or share photos or stories of sponsored children and communities. Barnfonden encourages sponsors to do this in a way that protects the privacy, dignity and safety of the children and families in our partner communities.

As such, Barnfonden staff will work to ensure that sponsors:

- Do not publish photos, letters or personal information that identify the child/family or where they live. Generally, it is acceptable to publish the child's first name, age and district or country where they live, but not their full name or the name of their village.
- Do not publish personal information or photos that could cause distress or increase risk for the child/family.
- Follow consent procedures for taking photos when undertaking a visit.

Any sponsor wishing to further promote the work of Barnfonden should always contact the Communications team. Failure to adhere to these guidelines may result in removal from the sponsorship programme.

Children, families or communities who are sponsored are provided with relevant information about the limitations on contact and the rationale. They are encouraged to contact Barnfonden staff if they have any concerns about a sponsor.

## 5.4 Sponsor Visits

All sponsor visits to supported communities must be authorised and arranged through Barnfonden's team in Malmö with the relevant ChildFund Alliance member/ Plan BØRNEfonden office. This minimises the risk of harm and exploitation to sponsored children, their families and communities.

Unauthorised visits are strictly forbidden and may lead to termination of the sponsorship.

### 5.4.1 Sponsors Visiting ChildFund Alliance/ Plan BØRNEfonden Managed Countries

Granting permission for visits is at the discretion of Barnfonden.

Sponsors are required to advise Barnfonden of their intention to visit at least eight weeks prior to departure.

Sponsors and any person over the age of 18 years accompanying them will be required to undergo a Swedish Police criminal record check. For anyone who has lived overseas for more than 12 months in the past five years, a criminal record check from this country will also be required. A check that is less than two years old may also be accepted. The process and cost of obtaining these checks and providing Barnfonden CEO with this information is the responsibility of the sponsor.

Sponsors, and those over 18 years accompanying them, are required to sign and comply with the *Behavioural Expectations for Sponsor Visits* (see [Annex 5](#)).

Barnfonden has the right to either refuse or cancel a sponsor visit if the results of the check are not provided or if the check contains any history of child related offences or at the discretion of the Barnfonden CEO. If a visit is cancelled or refused, the relevant Country Office is contacted and advised of the outcome of these checks, as the sponsor may still attempt to visit the child/community. Under no circumstances will any person who has had their request to visit a community denied, be allowed to visit, even if they travel to the Country Office or community to make a request in person. In this case, the Country Director is responsible for documenting the event and notifying the Barnfonden CEO.

For Barnfonden sponsors visiting ChildFund Alliance/ Plan BØRNEfonden managed countries, once the sponsor arrives in the programme country, child safeguarding responsibility lies with the ChildFund

Alliance/ Plan BØRNEfonden Country Office and the Alliance safeguarding requirements must be followed.

## 5.5 Conducting a Visit

**All sponsor visits must be accompanied by a ChildFund/Plan BØRNEfonden staff member.** Under no circumstances is a ChildFund/ Plan BØRNEfonden staff member to leave sponsors or people accompanying them unsupervised with children, their families or community members at any time during the visit.

Visits should not usually occur outside of the project area.

It is strictly prohibited for any visitor to arrange or encourage a visit by children or community members to the sponsor's accommodation or country of residence.

Meetings occur in public places such as the Country Office, the Field Office, a community hall, restaurants, parks, playgrounds, etc. and never take place at or near the child's home.

The Country Office staff members are responsible for ensuring that the child's actual place of residence is kept confidential at all times. This is necessary in order to prevent sponsors returning unaccompanied to a child's house after the scheduled visit.

The importance of confidentiality, privacy, the requirements for supervised visits and the strict guidelines regarding not leaving the project area are discussed with and explained to sponsored children, their families and community members. This ensures that they are able to maintain safety, not contravene any policies and knowhow and to whom to report to in the eventuality of inappropriate conduct.

During the visit, any inappropriate or suspicious behaviour by a sponsor is to be reported immediately to the Country Director and Barnfonden CEO. If the matter involves an incident or allegation of actual, suspected or potential abuse or exploitation of a child the matter must be reported using the Barnfonden reporting procedures.

## 5.6 Donor Organisations and Ambassador Visits

From time to time, Barnfonden may arrange visits by individuals such as ambassadors, officials from the Swedish Government, institutional donors, corporate donors, or UN agency.

Barnfonden will encourage such donors to give advance warning of their intention to visit, (preferably at least 30 days).

Donors will be provided with a briefing by Country Office staff, including information about child safeguarding expectations and procedures relevant to their visit.

At all times during donor visits to the field; the donor(s) must be accompanied by a ChildFund, Plan BØRNEfonden, or Barnfonden staff member or approved representative. Donors must not be left unsupervised with children; all donor interactions with children must be visible to the supervising staff.

At the Country Director's discretion, and subject to the agreement of parents/community leaders, donors can be allowed to visit the homes of community members, as long as arrangements for the supervision and monitoring of interaction with children are in place.

## 6 Project Risk Assessment and Management

Barnfonden acknowledges that the work we do is associated with child safeguarding risks. We are committed to doing everything in our power to identify and minimise preventable risk, and respond to concerns and incidents when they occur.

In the interest of preventing risk, we conduct a detailed child safeguarding risk assessment as part of the development of all new projects.

Additionally, through our external programmes, Barnfonden has activities that focus on child protection, which align with our internal safeguarding practices. Our child protection approach will aim to strengthen community based child protection mechanisms that prevent and respond to violence, exploitation, abuse and neglect.

Strengthening child protection is an on-going focus in Barnfonden’s programmatic practices, particularly around the risks children might face in their communities.

## 6.1 Project Planning and Design

When planning and designing a project, programme staff will:

- Detail potential child safeguarding risks and mitigation measures;
- Assess partners’ child safeguarding capacity;
- Include follow-up of child safeguarding risks in the planned monitoring and evaluation activities of the project;
- Offer capacity development support to partners in developing child safeguarding policy and procedures (as outlined in section 5)

Programme staff will use the following Risk Assessment table to identify child safeguarding risks and mitigation measures for projects:

Risk	Likelihood	Impact	Strategy to Mitigate	Monitoring (who and when?)

### 6.1.1 Factors to Consider in Identifying Risks

See the table below for guidance on identifying project child safeguarding risks.

<i>Factor</i>	<i>Description</i>
Contact with Children	The level of contact with children increases the likelihood or consequences of the risk. Greater risk may be associated when contact is with children who are very young, orphaned or vulnerable, living with disabilities, in contact with the law, victims of abuse/exploitation, living in child-headed households, displaced.
Nature of Activities	Certain activities can pose a greater risk, particularly those involving: one-to-one contact, physical contact, personal hygiene tasks, visitors, overnight stays.

Location	Location factors can increase risk. Consider locations, which are: isolated, overcrowded, refugee/IDP camps, disaster areas, secluded or inaccessible, or home-based. Local risk factors can include particular vulnerable communities and locations (e.g. locations prone to sex tourism, unsafe migration or trafficking, children living on the streets).
Legal Context	Consider the legislative context and capacity of duty bearers responsible for concerns and incidents in the context of the project.
Protective Factors	Consider any protective factors that exist formally and informally to mitigate risks. This could include project or organisational activities.

### 6.1.2 Determining Likelihood and Impact

When child safeguarding risks are identified, they should be assessed by taking into consideration the likelihood of events occurring (High, Medium, Low), and the impact that events would have on individuals or the organisation (High, Medium, Low).

## 6.2 Project Implementation

Throughout project implementation all staff must comply with the *Child Safeguarding Policy* and procedures, and the *Code of Conduct*, and remain alert and responsive to risks.

Barnfonden will ensure that all people engaged in projects understand how to report a concern or incident as described in section 9 of this *Child Safeguarding Procedures*.

## 6.3 Project Monitoring and Evaluation

Child Safeguarding concerns and incidents are identified and captured in quarterly reporting as detailed in section 9 of these procedures.

Evaluations explore relevant outputs of projects where applicable.

# 7 Humanitarian Emergencies

Barnfonden is committed to reducing children’s vulnerability to emergencies, ensuring their right to have humanitarian assistance in crises, and their right to survival and development during and after an emergency. While risk reduction is the best strategy to manage disasters, when emergencies occur, Barnfonden provides support to children and their communities to quickly recover and re-establish their lives, dignity and livelihoods.

All Barnfonden emergency responses should consider child safeguarding. All Barnfonden emergency response interventions will prioritise the needs of children. Emergency programmes will focus on protecting children’s rights and meeting the basic needs of children and families. Child safeguarding will be a central component of any response.

Barnfonden will adhere to the Minimum Standards for Child Protection in Humanitarian Action in our responses.

## 8 Marketing and Communications

### 8.1 Protecting Children's Personal Details

Barnfonden will undertake all reasonable precautions to protect paper and electronic information about children, families, community members and sponsors, including children who are enrolled for child sponsorship. In accordance with the Integrity policy (Barnfondens integritetspolicy).

Child address details are restricted to Barnfonden staff members and authorised volunteers or interns who require access to the information to perform their work. Information shared about children with sponsors will not include home addresses.

### 8.2 Communications and Reporting on Children

The *ChildFund Alliance Fundraising Standards*, *The Swedish Fundraising Council (FRIF)*, *Barnfonden Integrity Policy*, and the *Barnfonden Social Media Policy* provide detailed guidance for all Marketing and Communications materials involving children. The following principles related to child safeguarding are reflected:

- No photographic, electronic or printed material containing images or information relating to children that could put the child at risk of being located are made available through any form of communications. Exceptions require the authorisation of the Fundraising and Marketing Director.
- Information regarding the child's place of residence does not accompany any image of a child, including meta-data. Should information be present, it will be pixelated or removed;
- Photographers contracted by Barnfonden are briefed and sign acknowledgement detailing Barnfonden's expectations that children are portrayed respectfully and with dignity and power;
- All photographers are required to follow the *Child Safeguarding Policy and Procedures, and Code of Conduct*.

## 9 Raising Concerns and Incidents

### 9.1 Obligation to Raise Concerns

Barnfonden board members, staff, volunteers and interns, contractors and consultants, partner organisations, Barnfonden ambassadors and sponsors have an obligation to raise concerns if they have reasonable grounds to suspect that a child is being harmed or is likely to be harmed. If individuals knowingly choose not to raise a concern, they may be subject to disciplinary action including termination of employment or relationships with Barnfonden.

This policy covers concerns related to Barnfonden board members staff, volunteers and interns, contractors and consultants, partner organisations, Barnfonden ambassadors or sponsors' behaviour. However, through our close partnership with communities, Barnfonden will also respond to *all* concerns raised by identifying appropriate support, facilitating referrals, assisting with reports to relevant authorities and advocating where appropriate.

Community members also have the opportunity to raise concerns and child-friendly reporting mechanisms must be in place in all local partner offices and country offices.

## 9.2 Concerns and Incidents that must be raised

All board members, staff, volunteers and interns, contractors, consultants, partner organisations, Barnfonden ambassadors and sponsors must inform Barnfonden when they have a reasonable belief that a child has been harmed or is at risk of harm:

- When it is due to the actions of board members, staff, volunteers and interns;
- When it involves Barnfonden ambassadors or sponsors;
- When it is due to the actions of partner organisations, contractors, or consultants.

Concerns and incidents that must be raised include:

- An observation or disclosure of harm (by an adult or child) of actual harm or abuse to a child;
- A suggestion or indication of potential harm or abuse to a child;
- A breach of the *Code of Conduct, Child Safeguarding Policy or Procedures*;
- A breach of the *Behavioural Guidelines for Sponsor Visits*;
- Child pornography that is received through Barnfonden electronic equipment.
- You are aware that an individual involved with Barnfonden has abused a child they are in contact with through their work;
- You are aware that an individual involved with Barnfonden or a partner organisation has abused a child outside of work (a family member, domestic worker or through prostitution);
- A child unconnected to Barnfonden programmes approaches a Barnfonden staff member, consultant, volunteer or partner for help with an issue of abuse or exploitation.

## 9.3 How to Raise Concerns

**Within 24 hours of becoming aware of the concern or incident** you must inform Barnfonden's Secretary General on [ceo@barnfonden.se](mailto:ceo@barnfonden.se). For concerns relating to the Secretary General or where more appropriate, you should instead inform Barnfonden's chairman of the board on [chairman@barnfonden.se](mailto:chairman@barnfonden.se).

You can inform in person, by phone or email. Verbal methods should be followed up with written notification as soon as possible.

Incidents which have occurred will be formally investigated and responded to by the responsible role in consultation with the Child Safeguarding Focal Point and/or a member of the Senior Management Team or CEO. This will include externally reporting to the relevant authorities when a suspicion of a criminal offence has occurred.

Concerns and incidents will be assessed, rated and logged in the Child Safeguarding Register using de-identified language. The rating will determine how the risk is managed.

## 10 Investigating and Responding to Concerns

### 10.1 Documenting Concerns

Child safeguarding concerns are sensitive and note-keeping and communications must be handled carefully. The purpose of keeping notes is to objectively summarise the issues that arose, what occurred, what needs doing next and who attended where and when. These need to be retained on file to demonstrate how Barnfonden investigated and responded to all concerns and incidents.

Objectivity is the important principle. It is essential that what you write down is defensible. This should not discourage record keeping, but serve to ensure all notes are factual. Take care when referring to child safeguarding issues when facts are not known. Where possible, speak generally, (e.g. ‘child safeguarding concern’ rather than ‘child abuse’)\*.

You should include the following information in written documentation of the concern or incident if it is known, however it is important to inform soon, even if these details are not yet known:

- Nature of concern in as much detail as possible;
- Current concerns regarding safety of child
- Steps taken to mitigate further risk to child and other children
- Other parties involved in management of concern or incident
- Which authorities have been informed (if any);

It will be the responsibility of the person receiving the information (Country Director, Child Safeguarding Focal Point, or member of the Senior Management) to retain a file documenting the concern.

Files should be kept in a secure location (either locked filing cabinet or electronic files with restricted access).

Files should be updated with any further communication, including information regarding an investigation (where relevant) or response.

### 10.2 Child Safeguarding Register

Those responsible for receiving concerns must notify the CEO as soon as is practical. All concerns will then be logged in the Child Safeguarding Register by the Child Safeguarding Focal Point. A risk rating of the concern/incident will be conducted. Only anonymised descriptions are listed in the register.

Concerns rated as ‘High’ will be reported to the Senior Management. The Board, Relevant donors will be informed, at the discretion of the Senior Management, and in line with contractual requirements.

The Child Safeguarding Register will be shared with the Board through quarterly meetings if incidents have been notified in the quarter.

Some concerns or incidents may not involve serious impacts, or may have had impacts mitigated by our response. These will still be documented in the register but will generally not warrant external reporting.

### 10.3 Investigations

Concerns and incidents will be formally investigated and responded to by the responsible Barnfonden staff in consultation with the CEO or a member of the Senior Management.

---

\* In Swedish: ‘barnskyddsärende’ rather than ‘övergrepp’.

### 10.3.1 The Best Interests of the Child

In any concern, the best interests of child/children involved are the primary consideration in decision making. All efforts will be made by Barnfonden to ensure that the child or children are not at risk of further harm. Every effort must be made to ensure the immediate safety of the child and their safety throughout the investigation.

## 10.4 Responding

### 10.4.1 Deciding to Contact Police

Investigations will assess whether a concern or incident involves any Swedish or local laws. In consultation with a member of the Senior Management, a decision to contact Swedish or local police will be made.

Immediately reporting such instances to local authorities may not always be in the best interests of the child involved. In many of the contexts we work, local authorities do not have the resources available to effectively handle these types of situations so Barnfonden will ensure that local expertise is engaged to determine a response that is in the best interests of the child. We will typically engage local partners to support the reporting process when deciding to report to local authorities or police.

Regarding sexual offences with a child, Swedish Law (Brottsbalken kapitel 6) states that such offences committed towards a child abroad is punishable by Swedish law - regardless of local laws. Swedish Police will be contacted in the event that citizens breach this law. (Note that sexual activity with a child under 18 years will - at the least - be dealt with as a breach of the *Code of Conduct* resulting in disciplinary action).

### 10.4.2 Engaging Support Services

When concerns are initially raised, the Safeguarding Focal Point or Senior Management will identify appropriate support services for children involved (where relevant). In many cases, the individual raising the concern may be asked to assist in referring or engaging support services (where they exist).

### 10.4.3 Considering Personal Security

It is always important to consider the safety of those individuals who may be responding to serious concerns or incidents related to children. In some locations, the people reporting or responding to child safeguarding concerns can be threatened or have their safety put at risk. This does not mean that Barnfonden will not respond, but that we will carefully consider the context when planning a response. For this reason, particular care must be taken to maintain confidentiality around concerns and incidents.

### 10.4.4 Tips for Receiving a Disclosure

While a lot of our work requires quick action, child safeguarding is an area that benefits from carefully informing the responsible parties and formulating a careful, planned approach. *Remember that the only thing that has changed when you hear of a concern or incident is that you now know about it.* Take time to step back and be calm. Reacting quickly can have negative impacts on those involved.

Try to:

- React calmly and listen carefully;
- Take notes if it is appropriate;
- Explain that you, and Barnfonden takes such information seriously;
- Tell them that you believe them;
- Only ask questions to gain a clear picture. Be guided by the person talking to you;
- Identify any immediate actions needed for the safety of the child/children involved.

## Annex 1: Screening Requirements Matrix

Barnfonden Representative	Screening Requirements	Responsibility
Board members and Barnfonden staff	<ul style="list-style-type: none"> <li><input type="checkbox"/> Swedish Police Check (If the individual has been living overseas, a criminal record check must be conducted for each country in which the individual has lived for 12 months or longer over the last five years). Should this not be available, a signed Character Reference is needed.</li> <li><input type="checkbox"/> Signed Code of Conduct</li> <li><input type="checkbox"/> At least two verbal reference checks with specific questions relation to child safeguarding.</li> </ul>	Senior Management, CEO
Barnfonden volunteers, ambassadors interns and individual consultants or contractors	<ul style="list-style-type: none"> <li><input type="checkbox"/> Swedish Police Check. (If the individual has been living overseas, a criminal record check must be conducted for each country in which the individual has lived for 12 months or longer over the last five years). Should this not be available, a signed Character Reference is needed.</li> <li><input type="checkbox"/> Signed Code of Conduct</li> <li><input type="checkbox"/> At least two verbal reference checks with specific questions relation to child safeguarding.</li> </ul>	Director of the department that is engaging the person informs their manager from the Senior Management who completes the procedure

<p>Barnfonden Partner organisations and consultant organisations</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Evidence of own child safeguarding policy and procedures that are compliant with Barnfonden requirements. (In the absence of a compliant policy, commitment to work with Barnfonden to develop compliant policy and procedures)</li> </ul>	<p>Director of the department that is engaging the organisation informs relevant Senior Management member or relevant country director who completes the procedure</p>
<p>Suppliers and Contractors</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Evidence of own child safeguarding policy and procedures that are compliant with Barnfonden requirements. (In the absence of a compliant policy, commitment to work with Barnfonden to develop compliant policy and procedures)</li> </ul>	<p>Director of the department that is engaging the Supplier or Contractor.</p>
<p>Barnfonden sponsors and anyone over 18 accompanying them who are visiting a community in a Plan BØRNEfonden managed country or ChildFund Alliance Managed country</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Swedish Police Check</li> <li><input type="checkbox"/> Check for Swedish residence over last 5 years and conduct criminal record checks for other required countries</li> <li><input type="checkbox"/> Signed Behavioural Expectations for Sponsor Visits</li> </ul>	<p>Sponsor Relations staff inform the Sponsor, and undertake the Police Record Check.</p> <p>Sponsor Relations staff (Sweden) are responsible for securing signature of the Behavioural Expectations for Sponsor Visits form</p>
<p>ChildFund Alliance/Plan BØRNEfonden National Office staff, consultants or partner organisations who are implementing Barnfonden-funded projects</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Completion of the child safeguarding screening procedures including criminal record checks and signature of the Child Safeguarding or Child Protection Code of Conduct for the relevant organisation (ChildFund International, Plan BØRNEfonden or ChildFund Australia)</li> </ul>	<p>Programme Director or their delegate informs the relevant National Office staff who confirm that the procedure has been followed</p>

## Annex 2: Template Character Reference – where overseas police check unavailable

Date	
Applicant	
Position	
Referee	
Country of Residence	
Dates and place of residence	

\_\_\_\_\_ has applied for a position with Barnfonden and has advised us that you knew her/him when he/she lived in \_\_\_\_\_ from \_\_\_\_\_ to \_\_\_\_\_

It is important to Barnfonden that all people we recruit are able to demonstrate:

- That they do not have violent or child-related offences on a police record in any countries in which they have lived
- That they are/have been respected members of communities in which they have lived

Could you tell me a little about your community and what your position is within the community?	
How long have you lived in this community?	
How did you get to know _____? How long did you know him/her? How often did you see him/her in the community?	
To the best of your knowledge, was _____ involved in or convicted of any crimes, particularly crimes related to children?	
If _____ had any issues with the police or authorities while they lived in _____ would you have known about it?	
How did he/she interaction with people within the community generally?	

## Annex 3: Code of Conduct

*All Barnfonden staff, contractors, volunteers, partners, members of governing bodies (i.e. Board members), and other organisational adhere to the common values and commitments set forth in this Code of Conduct in their work with or through Barnfonden. This Code is meant to be used in tandem with its companion policy, Barnfonden's Child Safeguarding Policy. Sponsors, donors and other supporters are required to comply with the Code of Conduct when interacting directly with children and beneficiary communities, for example, when visiting or communicating with sponsored children.*

I \_\_\_\_\_ (insert name) acknowledge that I have read and understood the *Child Safeguarding Policy* and agree to abide by it and the following expectations in my work with Barnfonden.

### **I WILL:**

- 1. Treat all children fairly, with respect and dignity, regardless of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status; and**
  - Encourage open communication between all children, young people, parents, staff, and have children and young people participate in the decisions that affect them.
- 2. Uphold the integrity of Barnfonden by ensuring that my personal and professional conduct is, and is seen to be, of the highest standard; and**
  - Always care for and protect the rights of children;
  - Act in a manner that ensures that children's best interests are a priority;
  - Read and take action to understand the *Child Safeguarding Policy* and related *Procedures*;
  - Should I have questions or not understand, ask for clarification;
  - Conduct myself in a manner that is consistent with the values of Barnfonden;
  - Disclose to my employer, or decline any gifts that may be perceived to impact integrity;
  - Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before, or occurs during my association with Barnfonden, that relate to child exploitation or abuse.
- 3. Endeavour to keep children safe through child safe practices; and**
  - Maintain and promote a safe environment for children to participate in Barnfonden's activities;
  - Provide a welcoming, inclusive and safe environment for all children, young people, and their families and carers;
  - Wherever possible, ensure that another adult is present when working in the proximity of children;
  - At all times be transparent in my actions and whereabouts;
  - Respect cultural differences, but where cultural or traditional practices cause significant harm to children I will follow the incident reporting procedure to make my concerns known;
  - Take responsibility for ensuring I am accountable and not place myself in a position where there is a risk of allegations being made;
  - Self-assess my behaviours, actions, language and relationships with children;
  - Undertake NOT to hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way.
- 4. Prevent, oppose and combat all exploitation and abuse of children; and**

- Undertake NOT to abuse the power and influence that I have by virtue of my position over the life and well-being of a child;
- Speak up when I observe concerning behaviours of colleagues;
- Immediately report concerns or allegations of child exploitation and abuse and policy noncompliance in accordance with the incident reporting procedure;
- Report any concerns of child abuse according to the prescribed Barnfonden procedures;
- Use computers, mobile phones, video cameras, cameras or social media appropriately;
- Never exploit or harass children or access child exploitation material through any medium;
- Comply with all relevant Swedish and local legislation, including labour laws in relation to child labour;
- Undertake NOT to use language or engage in behaviour that is inappropriate, harassing, abusive, sexually provocative, demeaning, culturally inappropriate or intended to shame, humiliate, belittle or degrade children;
- Undertake NOT to seek to make contact and spend time with any child or young person outside programme activities;
- Undertake NOT to request any service or favour from a child in return for protection or assistance; to never engage in any exploitative relationships with a child, including sexual, emotional, financial or employment related relationships;
- Undertake NOT to hire children for domestic or other labour which is inappropriate given their age or developmental stage and interferes with their time available for education and recreational activities or which places them at significant risk of injury;
- Undertake NOT to invite unaccompanied children into my home, unless they are at immediate risk of injury or in physical danger;
- Undertake NOT to sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my line manager's permission, and ensure that the parent or another adult is present;
- Undertake NOT to use physical discipline or punishment with children.

**5. Safeguard and make responsible use of the information and resources to which I have access by reason of my relationship with Barnfonden; and**

- Exercise due care in all matters of Barnfonden business and not share any confidential information about a child or other work-related matters;
- Protect, manage and use Barnfonden's human, financial and material resources appropriately. Undertake NOT to use Barnfonden's resources to exploit or harass children or access child pornography.

When photographing or filming a child or using children's images for work-related purposes, I must:

- Assess and endeavour to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child;
- Obtain informed consent from the child and parent or guardian of the child before photographing or filming a child and explain how the photograph or film will be used;
- Ensure photographs, films, videos, DVDs and online materials present children in a dignified and respectful manner and not in a vulnerable or submissive manner; Children should be adequately clothed and not in poses that could be seen as sexually suggestive;
- Ensure images are honest representations of the context and the facts;
- Ensure file labels, metadata or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form;
- Understand that the onus is on me, as a person associated with Barnfonden, to use common sense and avoid actions or behaviours that could be construed as child exploitation and abuse.

**6. Refrain from any involvement in criminal or unethical activities that contravene human and child rights or activities that compromise the image and interests of Barnfonden; and**

- Undertake NOT to support nor take part in any form of illegal, exploitative or abusive activities, including child labour, child pornography, the trafficking of human beings and illegal commodities;
- Undertake NOT to engage children under the age of 18 in any form of sexual activity or acts, including paying for sexual services or acts;
  - For Barnfonden staff, this is regardless of the local age of consent. Ignorance or mistaken belief of the child’s age is not a defence.
- Failure to report such a relationship may lead to disciplinary action

A breach of the *Code of Conduct* or the *Barnfonden Child Safeguarding Policy and Procedures* constitutes grounds for disciplinary action, and may lead to dismissal from employment or service, and result in legal proceedings. A breach of any of the ‘Core Principles’ in the Code of Conduct is regarded as gross misconduct and will result in dismissal.

.....  
Name Position

.....  
Signed Date

## Annex 4: Child Safeguarding Values for Sponsors

**We know as a Sponsor that you are committed to helping children living in poverty. We hope that this experience allows you to build a stronger connection with a family and that it is a rewarding experience for both you and your sponsored child.**

**Child safeguarding is vital at all times, so we ask all Sponsors to uphold these values:**

- ✓ **Do no harm.** It may sound like common sense, but your contact with your sponsored child should never cause harm to them, their family or community. Be sensitive to the cultural values of your child, and don't disclose any information which might put them at risk.
- ✓ **Safety.** If you share your sponsorship story with your friends and family (including online), make sure you do not endanger your sponsored child by publicly disclosing their full name, where they live, private information (such as HIV status) or expose them to negative reprisals (e.g. linking them to political positions).
- ✓ **Positive Contact.** All contact needs to be mediated to protect both you and the child. So all correspondence and visits are managed by Barnfonden and the country office where your child resides. Don't engage in any non-mediated contact, including through social media or phone.
- ✓ **Be Role Models.** Set an example of good child safeguarding practice, e.g. avoid sharing pictures that may be seen as sexually suggestive or asking children to keep secrets.

You can share the child's photo, with first name and community name, but for safety reasons no further information.
---

## Annex 5: Behavioural Expectations for Sponsor Visits

I \_\_\_\_\_ (insert name) acknowledge that I have read and understood the *Child Safeguarding Policy* and agree to abide by it and the following expectations during any contact with children throughout my supervised visit. I understand that complying with these expectations helps Barnfonden to ensure safe environments for children.

I will:

- Remain with ChildFund/Plan BØRNEfonden staff/representative and ensure that I am in public places, in sight of staff throughout the visit;
- Not visit the home of the child or family or ask about the home's location;
- Not encourage visits by the child or family to my accommodation or to my home country;
- Be respectful and use polite language when speaking to children, and not discriminate for any reason;
- Never use physical punishment with children at any time;
- Never use language or behaviour that will shame or belittle children;
- Undertake not to hold, kiss, cuddle or touch a child in an inappropriate, unnecessary or culturally insensitive way;
- Undertake not to develop physical/sexual relationships with the children or other members of the community;
- Never take children, young people or families out of the community for any reason;
- Only take photographs with permission from the children, their families and ChildFund/Plan BØRNEfonden staff/representative;
- Only take photographs and images of children, young people, families or community members that are dignified and respectful and will ensure that children are adequately clothed in photos;
- Never use their images on the internet or public material without explicit consent, or use them in any way in which their location could be identified or their confidentiality or dignity could be breached;
- Not return unaccompanied by a ChildFund/Plan BØRNEfonden staff member to the location of the visit;
- Keep my personal contact details confidential, including social media accounts, and not ask for details of the child or family (this is to ensure any contact is mediated by ChildFund/Plan BØRNEfonden);
- Report any inappropriate or suspicious behaviour by ChildFund/Plan BØRNEfonden staff/representatives or other sponsors, or other child safeguarding concerns to the Country Director

.....  
Print Name

.....  
Signature

.....  
Date