

# Child Safeguarding Policy

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## Acronyms

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Child Safeguarding Policy .....	CSGP
UN.....	United Nations
UNHCR.....	UN Refugee Agency

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## Policy Overview

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This policy helps us to achieve our mission, to do our part in the building of a world where no child, under any circumstances, is forced to endure the trauma, stagnation and dehumanization. Through Better Days’ programmes our team provides care and support for refugee children through focused and tailored interventions facilitating their empowerment, resilience and positive growth. Our CSGP is our fundamental guideline to ensure the safeguarding of children involved in any aspect of our work.

**We, as personnel working with minors, have the responsibility and duty to keep them safe,** to work for their benefit, and to promote their well-being. To reach this ambition, we must ensure that children at risk are visible and provided a safe space in which healing can begin. We should always enter into a consensual collaboration with the child and, through this, facilitate the necessary support structures where life skills can be developed and their rights, needs and wellbeing approached and promoted in a holistic way.

This policy considers our responsibilities as adults working with children and emphasises a conscious approach to every practice. We, as adults, are the child’s point of reference and everything we do is an example of what should be done. The way we interact should encourage professional bonding as a means to help restore the child’s dignity and achieve growth. All adults working with children at-risk are role models and must guide positively. Furthermore,

every member of staff is paramount to the child's protection and this must be our focus when we work together in a multidisciplinary way to create nurturing environments.

This policy explains how we can fulfil our mission to unaccompanied asylum seeking children as Better Days in an appropriate way, that safeguards and secures, provides basic need assistance and holistic support, using language that fosters comfort and confidence, without ever causing any harm.

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## 1. What is Child Safeguarding?

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Child Safeguarding is a concept different to Child Protection:

- **Child Safeguarding:** The duty of care and responsibility of organisations to adopt preventative systems, policies and practices to safeguard all children they come into direct and indirect contact with from harm and abuse. In short, Child Safeguarding is how we prevent harm.
- **Child Protection:** Practices which measure, and structures to prevent and respond to abuse, exploitation, neglect and violence affecting children in all sectors, contexts and environments. In short, Child Protection is how we respond to harm.

### 1.1 Principles and Commitments

Below are the principles and practices which every member and associate of Better Days (i.e. staff, partners and volunteers) commits to follow when working with children and, by abiding by these, we guarantee the safest of conditions for all stakeholders.

**This policy is governed by the basic principles of UNHCR's Safeguarding Fundamental Rights (2018-2019):**

1. Empowerment and Gender Awareness
2. Integration and Inclusion
3. Resilience and Autonomy
4. Individualism and Identity
5. Multiculturalism and Diversity

**And by these main elements guiding all Better Days' practices and services:**

6. Utilitarianism
7. Professionalism and Self-Reflection
8. Holistic Approaches
9. Respect and Equality
10. Healthy Boundaries

11. Superior Space Design
12. Accreditation and Progress

**Better Days' work is built around a strong organizational commitment to:** [SEP]

- 1. Zero Tolerance of Child Abuse:** this refers to any form of abuse by anyone who works for, or is associated with, Better Days in any capacity.
- 2. Confidentiality, Safety and Best Interests of the Child:** all matters will be kept as confidential as possible and information will only be shared on a need to know basis with a focus on the safety and best interests of the child.
- 3. Accountability:** Better Days' systems document, monitor and report on the implementation of the CSGP and we have the mechanisms to ensure that management and staff understand, and are committed to, their CSG roles and responsibilities to their fullest capacity. [SEP]
- 4. Shared Responsibility:** All Better Days' partners and contractors' staff and associates must commit to and uphold the principles of the CSGP so it can be meaningful and successful. [SEP]

**Complemented by our dedication to these General Principles:**

- All children have equal rights to protection from harm.
- Everybody has a responsibility to support the protection of children.
- Organizations have a duty of care to children with whom they work, are in contact with, or who are affected by their programmes.
- If organizations work with partners they have a responsibility to help partners meet the minimum requirements on protection.
- All actions on CSG are taken in the best interests of the child, which are paramount.

**Finally, these are Better Days' Non-Negotiables:**

- 1. Do not subject a child or adult to sexual, emotional or physical harm, exploitation or abuse**
- 2. Do not exchange goods, money, favours or services for sex**
- 3. Do not have sexual contact with a person receiving assistance**
- 4. Do consistently promote effective safeguarding in your work**
- 5. Do report any concerns you may have. If in doubt – report**

*Note: Better Days expects that these principles and values are honored by all staff, partners and volunteers during work and off work hours, and holds the right to investigate and act against any claims and concerns of non-compliance; furthermore Better Days will investigate any reports or concerns of abuse.*

## 1.2 Further Policy Coverage

To promote children's rights, we must distance the children from risk. To do so we must understand the risks, address them and take decisive actions to minimize exposure to active/potential risks. Thus, the basic procedures of this CSGP acknowledge these risks and the implementation of measures to address them. The more risks are identified, the more risks can be prevented. This CSGP provides content for Better Days to set guidelines and agreements providing structure, clarity, transparency, ethos, and overall good practices, including:

- [CSG Self Audit Tool](#) : to assess internal organizational gaps
- **Risk Assessment Guidance**(Appendix 1): how to adapt existing risk management tools to include CSGP risks
- **Safe Working Practices which includes [Burnout and Resiliency Tool](#)**: effective self-management tips to reduce secondary trauma by identifying good practices to prevent and recognize burn out . This section includes self evaluation tools to assess Burnout and Resilience.

However, even with the most robust CSGP, abuse may still take place within the organization. In case of abuse (Appendix 2) perpetrated by a Better Days team member, volunteer or staff, the organization must define the protocol and actions that must follow.

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## 2. How can we ensure Child Safeguarding?

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### 2.1 CSG Mechanisms

Firstly, by signing the [CSGP Commitment](#), team members declare they have read, understood and will comply with the CSGP.

- **Managing Allegations Against Staff**

An allegation reporting that a team member has behaved inappropriately, or in an unsafe way, will be taken seriously. Better Days will respond to such suspicions and allegations of child abuse in a manner that ensures safety of the child. Suspicions or allegations against staff will be treated with the same commitment as those made against any other person.

In cases of child abuse, Better Days will not act alone; we will refer all suspected situations of child abuse to the police and/or guardians. When abuse is suspected, staff will follow the process for 'Responding to Suspected Child Abuse' (1.3). This outlines that, though the child's safety is the first concern, the accused must also have access to legal and professional advice.

- **Allegation/s against Better Days staff member; Incident Report (next steps):**
  1. Investigation is conducted to gather further information
  2. No further action (i.e. if information is insufficient to follow up)
  3. Immediate disciplinary action if no further information needed
  4. Referral to relevant authorities

All options include the steps below:

- Management of the investigation
- Decision-making regarding the investigation outcome
- Confidential storage of case information at investigation conclusion

*Note: during any investigation, the suspected team member will be prevented from any further unsupervised access to children and will be informed fully of their rights. The allegation may represent poor practice that needs to be considered under internal disciplinary procedures. The person managing the child abuse concern will be different to the person managing the employee’s consequences. Members of the staff are asked to collaborate in this process for the best interest of the minor and for ethical reasons.*

● **How Can a Child Report an Incident?**

Children can report in three different ways, with all complaints considered equally. Upon receiving a complaint, an impartial officer will be contacted immediately for further action.

<u>Written Complaint Form</u>	<b>Oral or Electronic Complaint</b>	<b>Digital Complaint:</b>
Available at the Help Desk in an accessible place and provided in English, Farsi, French, Bengali , Urdu , Pashto , and Arabic	BD’s Compliance Officer will receive online complaints (anna@betterdays.ngo) and oral complaints in any language (+302251046560)	via Kobo survey in link to Better Days’ official site.

● **Staff Form: How a Team Member Reports Suspected Child Abuse**

Despite all preventive measures, child abuse can still happen, therefore, a solid system must be in place to respond. As such, all Better Days’ staff and associates are obligated to report any witnessed, suspected or alleged cases of child abuse or exploitation by another staff member or associate of BD, as well as partners, contractors, or visitors to Better Days projects.

At all times during the reporting process and subsequent actions, Better Days is committed to:

1. Ensuring the safety, wellbeing, dignity and best interests of the child
2. Taking every report of child abuse seriously
3. Ensuring that all parties are treated fairly
4. Ensuring all procedures are transparent and in line with the law

5. Dealing with child abuse reports in a confidential and timely manner, always keeping in mind the protection of the <sup>[1]</sup><sub>SEP</sub> survivor, the reporter and the alleged perpetrator.

All Better Days' staff and volunteers are required to inform the direct LINE manager and/or the Senior Child Protection Officer directly, depending on the issue.

**Everybody must take responsibility and care for what happens in the projects they work on. If child abuse, or other concerns or protection issues are suspected, witnessed, reported, or disclosed, the staff receiving the concern must act immediately to secure the child's safety.**

### Listen, record and consult:

- **LISTEN** to the child and reassure them. Do NOT make promises or commitments you cannot keep. Do NOT formally interview the child. Obtain only necessary relevant facts if and when clarification is needed. Ask Who, When, Where, What but not Why. Always repeat/check your understanding of the situation.
- **RECORD** any physical or behavioral observations, perceptions, and anything said by the child (using the child's own words as far as possible). Include, date, time, who was present, etc.
- **REPORT** immediately with the Project Director or Coordinator in charge. Discuss and agree on an appropriate course of action, incl. whether a report of concern is to be made.

### Report your concern:

You can use the [PSS Referral Form](#) to record suspicions and concerns: all concerns must be reported, including small observations and interpretations. It might be nothing, but it could be the right moment to act and protect.

**If speaking to the child through an interpreter:** ensure that the interpreter is aware of the importance of translating the exact words used by the child to disclose information.

**If an incident, disclosure, or suspicion of child abuse takes place:** the intervention and follow up will be closely coordinated by the affected team, Better Days' Director and the Senior Child Protection Officer within 24 hours.

- **Internal Child Safeguarding Procedure (diagram)**

When working with children daily, you might identify diverse vulnerabilities. If you do, there are two guidelines to follow depending on whether the issues were observed/suspected by an adult or disclosed by the child. These are described in the flowchart below.

### What do we do when we suspect a child or teenager needs safeguarding flowchart?

Abuse /Suicide attempt/ Disorder/ Special needs suspected

Respond to the situation by

Record suspicions  
Speak to Project Director or  
Coordinator  
Start the PSS report & sent it to

If your suspicions are diminished ,continue to monitor the situation closely in consultation with other team members & the PSS coordinator

If your concerns still exist

Report the situation through PSS referral form

## 2.2 Development of Good Practices

### ● Safe Recruitment

We have strict recruitment processes to mitigate the chances of abuse and/or improper behavior. Below are our basic processes:

- Staff and volunteers must be academically qualified to perform their duties
- Applicants must submit a clean criminal record certificate
- Applicants must have a substantial amount of experience in their area of work
- Qualifications or experience in Social Work, Social Education, Pedagogy, and Psychology will enhance an application
- Applicants' CVs will be reviewed and discussed during the first interview
- Applicants must attach a cover letter with the CV
- Applicants must provide two references from recent employers
- There is a two-stage interview process
- All new staff will complete a 3-month probation period

More detail of our recruitment processes can be found in the [Hiring procedure](#) and [Staff Recruitment Policy](#).

### ● Training

Training ensures best practice and, for this reason, we provide a general induction training on entry and then, further, mandatory and specific trainings to enhance individual staff capacity where needed.

Consultancy with the PSS Officer can happen every time the team faces a challenge in terms of protection.

Volunteer Training	Employee Training
<ul style="list-style-type: none"><li>- Volunteer Handbook pre-arrival</li><li>- One week induction training upon arrival</li><li>- Other specific trainings as required</li></ul>	<ul style="list-style-type: none"><li>- Two week induction training upon arrival</li><li>- General training pre- any project launch</li><li>- Specific capacity building trainings</li></ul>

*Note: Regular discussions will be held between the Project Director and staff members to understand and facilitate their personal training ambitions. If the Project Director identifies that any team member requires some training to develop a specific skill, they will refer the member of the staff to relevant trainings.*

### ● Creating a Safe Space

Every space we work in is adapted to ensure the safety and comfort of, and bring out the best in, the children we work to protect. However, a safe space is not only a physical space, it is the trauma-informed atmosphere we create to support PSS purposes and facilitate the healing and engagement, learning and development of UASC.

Some steps to creating a child-safe environment:

1. Cultivating a comfortable, confidential and cozy environment.
2. Use of check-in and check-out techniques, whilst also providing time to transition.
3. Speaking softly, politely and calmly whilst always calling a child by their name.
4. Briefing the child on what they will be doing and when.
5. Practicing active listening, showing understanding and empathy, praising when appropriate, and always acting stably and predictably.
6. Setting boundaries and sticking to them.
7. Acting as a positive role model for children to follow.
8. Building a sense of belonging for the child - make the space feel their own.

- **Photography Policy and Social Media Communication**

This is Better Days' [Photography Policy](#) which also covers social media communications. With regards to children, it is always best to assume a default status whereby photos are not allowed. In cases where photographs are consented:

- "Any photograph taken under the provisions of this agreement which reveal the identity of the photographed child or adult shall remain embargoed from media, publication, or social media absent the consent of the individual photographed (if he/she is an adult) or the child's guardian (the public prosecutor in the case of an unaccompanied minor)."
- "Photographers are to strictly respect a child's right to not be photographed, to be photographed only from behind, and to have any identifying features blurred in final publication."
- "Children being photographed have a right to have a guardian and/or consenting peer in the same room with them, whether this other individual is also being photographed or not, and to request that doors, windows, or blinds remain open throughout. **Under no circumstances is a child to be photographed alone, behind closed doors.**"

## 2.3 Staff Requirements

- **Confidentiality and Information Sharing**

- All staff and volunteers must sign a [Confidentiality Agreement](#) before working with beneficiaries.
- All documents should be stored in a digital format on BD's GDrive. If hard copies must be produced, they should be stored in the secure PSS cabinets.

- Personal UASC data must not be published or disclosed online, nor to any other organizations, teams, professionals, or individuals outside of Better Days. Unless the child gives relevant authorization .
- UASC data must be saved in Better Days' GDrive folders where only specific persons have access to it.
- UASC information shouldn't be discussed informally outside of the workplace.
- UASC names/locations should never be discussed in WhatsApp/Slack/Trello etc.

Further information related to processes of informed consent are found in the [Informed Consent](#)

- **Code of Conduct**

Better Days' [Code of Conduct](#):

- (a) Applies to, and is signed by, all staff and associates of Better Days, including partners, contractors and visitors; <sup>[SEP]</sup>
- (b) Describes expected behaviors in relation to children, detailing what is appropriate and inappropriate <sup>[SEP]</sup>conduct, prescribing professional boundaries and defining acceptable and unacceptable relationships;
- (c) Serves to avoid ambiguous situations and behaviors in the workplace, which may be misinterpreted or misunderstood, and potentially lead to false allegations against staff and associates;
- (d) Ensures that all staff and associates understand how to report breaches and cases of misconduct.

The Code of Conduct should be translated into local languages where necessary and information communicated to beneficiaries using an appropriate user-friendly format so that children understand what behaviors are expected of staff and associates.

- **CSGP Commitment Form**

The CSGP [Commitment Form](#) must be signed by all employees and volunteers to show they have read, agree and understand all the sections of this policy.

## 2.4 Monitor and Review

Everything mentioned in this document will remain effective as long as its practices are regularly reviewed and monitored to ensure that they are still relevant to the projects and beneficiaries. The designated person to design the CSGP has the responsibility to coordinate with the Project Directors and supervise the staff and volunteers in order to ensure that all guidelines are being implemented as agreed. The review and redesign should occur at any time it is identified that a change is required. The review must consider the opinions and concerns of the team. Records of

CSG incidents reported throughout the year and will be evaluated annually, as part of the monitoring and evaluation process. Monitoring and reporting mechanisms are working for each department and as an organization.

More detailed information about the accountability issues and procedures are available in relevant protocols and annual reports. Moreover, internal audits with [Child Safeguarding Self Audit Tool](#) increases the quality of services provided.

## 2.5 Relationships with External Agencies/Partners

Where we have the capacity and expertise to fulfill the needs of the child professionally and effectively, we commit to doing so; where there are more complex needs, Better Days has the responsibility to refer the child on to the appropriate service in accordance with their best interest. Whenever we refer a child on, Better Days takes the responsibility to ensure external agencies and other stakeholders that they assign the child to follow Child Protection Standards, have implemented a CSGP and have a Code of Conduct which ensures children's safety within the context in which they work. These documents should be accessible and regularly updated.

We believe that the welfare of the minor should be covered by organizations in the following ways:

- raising awareness of risk situations
- prevention of abuse or harm
- reporting abuse or harm
- responding to allegations of abuse of harm

There should be clear criteria amongst all organizations and agencies working with children for taking action and providing help to ensure that services are commissioned effectively, and that the right help is given to the child at the right time.

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## 3. When do Child Safeguarding Standards apply?

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Adherence to Child Safeguarding Standards is an obligation of all BD staff, volunteers and associates. Upon signing the CSGP Commitment, we dedicate ourselves to keeping children safe both inside and outside the work environment.

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## 4. Where & Who does the CSGP apply to?

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## Purpose of the Policy

The purpose of this Policy is to establish a set of internal preventative and responsive measures and procedures to:

1. Safeguard children: by minimizing the risk of intentional or unintentional harm, abuse and exploitation of children within Better Days and its supported programs, and adequately responding in the event that harm and abuse occur. <sup>[1]</sup><sub>[SEP]</sub>
2. Safeguard staff: by avoiding ambiguous workplace situations and behaviors, which may be misinterpreted and potentially lead to false allegations against Better Days staff and associates. <sup>[1]</sup><sub>[SEP]</sub>
3. Safeguard Better Days: by showing its genuine commitment to safeguarding children and preventing cases of abuse from happening

### 4.1 Where?

Child Safeguarding applies in all contexts where BD staff interact with a child or children. The CSGP does not only apply to beneficiaries we support, but to all children in all circumstances. This means we commit ourselves to promote and ensure all children's safety at all times, both in our operational and programmatic contexts, but also at all other times and in all other places outside of the workplace environment.

### 4.2 Who to?

The CGSP applies to:

- **All staff and associates of Better Days**, full time or part time, temporary or long-term. This includes consultants, interns, volunteers, Board members and any other person associated, or working under contract, with Better Days in any capacity <sup>[1]</sup><sub>[SEP]</sub>
- **All Better Days partners and contractors**, including downstream partners, suppliers or any other entity under contract with the organization.
- **All visitors to Better Days' programmes** and activities or those which BD supports, conducted by partners. Such visitors include donors, supporters, ambassadors and any other person visiting supported programs for any purpose.

*Note: feedback and complaints not related to Better Days's programs, commitments and conduct will not usually be responded to. However, complaints received that are related to the safety and protection of beneficiaries will be immediately reported to relevant authorities.*

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## 5. Anything Else?

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## 5.1 Definitions of Child Abuse

The following definitions attempt to clarify the meaning of all abusive practices experienced, in the present or in the past, by our target group.

- **Physical Abuse**

Physical abuse is a non-accidental act on a child that results in physical harm. This includes, but is not limited to, beating, hitting, shaking, burning, drowning, suffocating, biting, poisoning, or otherwise causing physical harm to a child. Physical abuse also involves the fabrication or inducing of illness.

- **Emotional/Psychological Abuse**

Emotional abuse is a persistent emotional ill treatment of a child such as to cause severe and continued adverse effect on the child's emotional development. This can include a pattern of rejecting, degrading, ignoring, isolating, corrupting, exploiting, or terrorizing a child. It may also include age or developmentally inappropriate expectations being imposed on children. It also includes seeing or hearing the ill treatment of others. Any humiliating or degrading treatment such as name calling, constant criticism, belittling, persistent shaming, or solitary confinement is also considered emotional/psychological abuse.

- **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities (penetrative and non-penetrative, e.g., rape, kissing, touching, masturbation) as well as non-contact acts such as involving children in the looking at or production of sexual images, sexual activities, and sexual behaviours. Staff should be aware of their 'duty of care,' which precludes developing a sexual relationship with or grooming of a child. A sexual relationship between an adult and a child will always be wrong, unequal, and unacceptable.

- **Sexual Exploitation**

Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. This includes exchange of assistance due to children benefiting from Better Days programming. The sexual exploitation of a child who is under the age of consent is child sexual abuse and a criminal offense.

- **Commercial exploitation**

Commercial exploitation is using a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, or moral or social-emotional development. It includes, but is not limited to, child labour.

- **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, causing serious long term harm to the child's health or development. It may also include neglect of a child's basic or emotional needs. Neglect is a lack of appropriate action, emotion, or basic needs.

- **Overprotection**

Overprotection can be exercised by parents, caregivers, or members of the staff of our organization. It is considered undue or excessive protection or shielding, specifically, excessive restriction of a child's behavior allegedly in the interest of his or her health and welfare by an anxious, insecure, or domineering parent/caregiver.

- **Institutional abuse**

Institutional abuse represents any form of abuse or neglect while a child is in the care of an institution. If the maltreatment is caused by employees of the institution, it is classified as institutional abuse. Institutional abuse is often difficult to identify because it is usually psychological and it implies an abuse of the default power of the staff.

It is the responsibility of everyone working in a service to be aware of those practices and to denounce and report them as soon as possible to the immediate responsible of the project/center.

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## 6. Document Guidance

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- [CSG Self Audit Tool](#)
- [Burnout and Resiliency Tool](#)
- [CSGP Commitment](#)
- [Written Complaint Form](#)
- [PSS Referral Form](#)
- [Photography Policy](#)
- [Hiring procedure](#)
- [Staff Recruitment Policy](#)
- [Confidentiality Agreement](#)
- [Informed Consent Document](#)
- [Code of Conduct](#)

### Appendix 1

#### CSG Risk Assessment

Better Days adopts a thorough CSG risk management strategy which includes:

- (a) Integrating CSG risks into existing risk management processes of each team within Better

Days

**(b)** Conducting a CSG risk management exercise before any team commences a program or conducts a new activity or event, which involve, target or affect children.

Therefore, Better Days' CSG risk management processes involve:

1. Identifying risks (i.e. detecting the potential for something to happen that will have an impact on children staff and associates, or Better Days as an organization);
2. Assessing the risks (i.e. evaluating the likelihood and level of impact)
3. Minimizing the risk (i.e. developing strategies to minimize or address the risk, reducing the likelihood of harm and abuse from actually occurring, clearly assigning responsibilities in the mitigation strategy)
4. Regularly reviewing risks and mitigation strategies, especially when conditions/contexts change.

Main objective of this Policy is based on the right of every child to be safe from physical, sexual and emotional abuse and exploitation.

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## 7. References

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B. Berrett., D. Koehler et ., A. Siebert (2015) Practical Psychology Press,Chapter 2, *The Resiliency Advantage*. All rights reserved. See ResiliencyCenter.com.

<https://www.keepingchildrensafe.global/child-safeguarding-audit/>

Notes : 1. Authorized by Dan Teuma , Programming Director

2. Contact Senior Child Protection officer for anything relevant further at [pss@betterdays.com](mailto:pss@betterdays.com)