

Procedure Title	Safeguarding and Counter-Human Trafficking Procedures
Version No.	SGP-01
Effective Date	3/25/2024
Related Policy or Policies	Safeguarding and Counter-Human Trafficking Policy
Approver	General Counsel
Point of Contact	Managing Director of Safeguarding
Applicability	<input checked="" type="checkbox"/> Save the Children Federation, Inc. <input checked="" type="checkbox"/> SCUS Head Start <input checked="" type="checkbox"/> Save the Children Action Network <input checked="" type="checkbox"/> Other: Sub-awardees, partners, vendors, suppliers, consultants, and others with whom we provide assets in exchange for services or products (collectively, "Partners")

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Purpose

These procedures are mandatory for Save the Children Federation, Inc., Save the Children Action Network, and SCUS Head Start Programs (collectively “SCUS”) Representatives (including employees, volunteers, interns, and Trustees), Partners (Sub-awardees, partners, vendors, suppliers, consultants, and others with whom we provide assets in exchange for services or products), and Program Visitors.

Procedures

See Annex 1 of the [Safeguarding and Counter-Human Trafficking Policy](#) for definitions of terms included in these Procedures.

#	Procedure/ Action	Action Owner
Procedure 1 – Roles and Responsibility for the Implementation of the Safeguarding Policy		
1.	All SCUS Representatives have a responsibility to understand and adhere to the Safeguarding and Counter-Trafficking Policy (the “Policy”), as well as the Behavior and Conduct Guidelines and applicable procedures. They are responsible for ensuring that safeguarding prevention measures are incorporated in their respective work and immediately report (within 24 hours) any safeguarding concerns. Representatives are required to participate in safeguarding investigations when their participation is requested.	All Representatives
2.	Managers, Department heads, or Division VPs will be responsible for the following: <ul style="list-style-type: none"> Identifying and addressing Safeguarding risks within their areas of responsibility and addressing them with the assistance of the National Safeguarding Team. Reporting to EthicsPoint any safeguarding concerns that are disclosed to them within 24 hours. 	All Agency Leaders

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	<ul style="list-style-type: none"> Taking appropriate corrective actions to address the findings from investigations and reviews. 	
3.	The Senior Leadership Team (SLT) is responsible for approving any changes to the Policy.	Senior Leadership Team (SLT)
4.	The General Counsel is responsible for maintaining the Policy, for approving and updating these Procedures, and for reviewing and making determinations concerning exceptions to the Policy and Procedures.	General Counsel
5.	The National Safeguarding Team is responsible for supporting the implementation of the Policy and related Procedures, providing consultation for division VPs as required to support program operations, developing frameworks and tools to advance safeguarding culture and consistent implementation within the organization, strategic planning to address challenges and opportunities to strengthen safeguarding, investigating, and responding to safeguarding concerns, reports or policy violations.	National Safeguarding Team
6.	The Safeguarding Advisors and Focal Points are the primary contact for the National Safeguarding Team within other divisions. The roles are trained and supported to deliver a 'first line of defense' in the application of safeguarding principles, empowered to make informed decisions on Safeguarding within their team, increasing Safeguarding awareness and engagement within their teams, sharing advice and updates, and raising concerns of Safeguarding Policy violations to the National Safeguarding Team.	Safeguarding Advisors Safeguarding Focal Points
Procedure 2 – Awareness/Dissemination of Policy		
1.	The National Safeguarding Team will ensure that the Safeguarding & Counter-Human Trafficking	Managing Director, Safeguarding

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	Policy (the “Policy”) and reporting methods are accessible on the SCUS public website.	
2.	<p>All Representatives will sign an acknowledgement of receipt and understanding of the Safeguarding Policy within 45 days of hire.</p> <p>A record of this acknowledgement will be kept by People & Culture.</p>	<p>All Representatives</p> <p>Head, Talent Development & Organizational Effectiveness or their designee</p>
3.	<p>In consultation with the National Safeguarding Team and Partners (where applicable), Safeguarding Advisors/Focal Points will develop and disseminate age and developmentally appropriate materials to Program Participants to support their understanding of the Policy and steps for reporting safeguarding concerns. Where appropriate and feasible, visual materials should be posted in program sites outlining expected behavior from staff and reporting channels.</p>	<p>State and US Southern Border Directors (USP)</p> <p>Program Directors (Head Start)</p> <p>Safeguarding Focal Point (SCAN)</p>
4.	<p>Safeguarding Advisors/Focal Points of each program (where applicable) will develop, maintain, and adhere to procedures that specify how children and families will be informed of safeguarding expectations and reporting procedures, including:</p> <ul style="list-style-type: none"> • How verbal reviews will be provided to children and adults in a manner that is culturally sensitive, context appropriate, and takes into account other factors such as language, ability, children’s ages and developmental levels. • A timeframe for the initial verbal review, and a schedule and method for regularly reviewing such content with children on an ongoing basis. 	<p>State and US Southern Border Directors (USP)</p> <p>Program Directors (Head Start)</p> <p>Safeguarding Focal Point (SCAN)</p>

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Procedure 3 – Recruitment and Vetting		
1.	People & Culture will collaborate with Hiring Managers to identify safeguarding responsibilities for all job roles and locations. Safeguarding responsibilities will be clearly stated in each job description.	Managing Director, Talent Acquisition & Attraction, or their designee
2.	All job postings will emphasize an expectation for the applicant, if hired, to fulfill responsibilities to keep children and adults safe within the organizational environment.	Managing Director, Talent Acquisition & Attraction, or their designee
3.	<p>In addition to the requirements for background checks of Representatives detailed in the Background Check Policy, People & Culture will carry out the following additional activities pursuant to SCUS' participation in the Misconduct Disclosure Scheme:</p> <ul style="list-style-type: none"> • Check with prospective staff's prior employers for substantiated and ongoing investigations alleging sexual exploitation, abuse, and harassment (SEAH); and • Respond to requests for information on substantiated and ongoing investigations into allegations of SEAH concerning current and former staff from other organizations as part of their recruitment process and participation in the Misconduct Disclosure Scheme. <p>Any candidate indicated to be a risk to children or adults through the screening process detailed above, will be reviewed for placement on the "Do Not Hire" list. In addition, an employee terminated for misconduct will also be reviewed for placement on the "Do Not Hire" list.</p>	Managing Director, Talent Acquisition & Attraction, or their designee

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Procedure 4 – Staff Learning and Development		
1.	The National Safeguarding Team shall develop and maintain appropriate training materials to support the onboarding of new staff, refresher training for current staff, and more specialized training for staff where appropriate.	National Safeguarding Team
2.	<p>All SCUS employees and interns must complete safeguarding and human trafficking training which must include details of the Safeguarding and Counter-Human Trafficking Policy, guidance on promoting a culture where children’s and adult’s rights are observed, how to identify potential harm to program participants and how to report allegations and suspicions of abuse. This training will be completed within 45 days of hire and on a bi-annual basis.</p> <p>Completion of this training will be recorded centrally and will be available for audit and compliance work.</p>	<p>All Staff</p> <p>Head, Talent Development & Organizational Effectiveness or their designee</p>
3.	Staff responsible for responding to reports or disclosures of safeguarding violations will complete specific training in receiving and responding to disclosures. Such training will be completed prior to the staff members receiving and responding to reports and disclosures.	National Safeguarding Team
4.	As necessary and appropriate, additional guidance will be provided on behavioral expectations in specific contexts (e.g. classrooms).	National Safeguarding Team
Procedure 5 – Safe Programming		
1.	The National Safeguarding Team shall develop and maintain tools and guidance to assist programmatic and operational Divisions to assess the risks to children and adults arising from potential new or	National Safeguarding Team

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	<p>modified projects or activities and how to engage children, their caregivers, and adult program participants in monitoring these risks.</p> <p>At minimum, all program and activity-level risk assessments will consider the following (including budgeting impacts):</p> <ul style="list-style-type: none"> • Obtaining informed consent from guardians and child assent; • Managing sensitive data on program participants; • Mitigating risks of exploitation, abuse, and neglect; • Ensuring no child or adult is excluded from program or service activity because of discrimination, including, without limitation, discrimination on the basis of disability, racial & ethnic heritage, national status, tribal affiliations, religious beliefs, languages, gender or gender association, LGBTI+ identity, and/or medical/physical conditions; and • Appropriate staffing ratios of adults to children. 	
2.	<p>Divisions will integrate these Safeguarding assessment tools and guidance into their program and activity-level risk assessment processes to ensure that Safeguarding risks are assessed before initiating a new project or activity or a significant change to an existing project or activity.</p> <p>Identified Safeguarding risks will be documented and will be used to inform a written mitigation strategy to include specific actions and timelines. Completed program or activity-level risk assessments and any accompanying documents will be kept on file by the division for review and auditing purposes.</p>	<p>State and US Southern Border Directors (USP) Program Directors (Head Start)</p> <p>National Safeguarding Team</p>

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	For international programs, Save the Children International will be responsible for following their own established procedures for assessing risks in US-funded international programs. SCUS International Program Team will ensure that the risk assessment is completed and uploaded into the Award Management System.	Save the Children International
3.	To ensure programming is responsive to the needs of and accessible to children with disabilities, disabled children and their caretakers should be consulted during the design and implementation of programming wherever possible. To ensure reasonable accommodations are properly met, systems will be set up to ensure parents of children with disabilities can request reasonable accommodations for their children participating in SCUS' programs.	Disability & Inclusion Advisors Safeguarding Advisors & Focal Points
4.	The National Safeguarding Team will work with MERL teams to embed safeguarding considerations within Monitoring and Evaluation frameworks. MERL staff will flag any area of concern or improvement identified to Safeguarding Advisors or Focal Points (or to Save the Children International, as appropriate) to ensure that action plans to address safeguarding risks or procedural gaps are in place.	Monitoring, Evaluation, Research, and Learning (MERL) National Safeguarding Team Safeguarding Advisors & Focal Points
5.	For each award that is subject to FAR 52.222-50 Combating Trafficking in Persons, FAR 52.222-56 Certification Regarding Trafficking in Persons Compliance Plan, the ADS 303 Mandatory Standard Provision on Trafficking In Persons (July 2015), and/or the ADS 303 Mandatory Standard Provision on Safeguarding Against Exploitation, Sexual Abuse, Child Abuse, And Child Neglect (October 2023) with an estimated value of \$500,000 or more (excluding commercially available off the shelf items or services), a compliance plan must be developed that is	Save the Children International Award Managers, International Programs

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	<p>appropriate to the size and complexity of the award and to the nature and scope of the activities to be performed.</p> <p>Save the Children International will be responsible for developing the compliance plan. SCUS will be responsible for ensuring the compliance plan is completed and uploaded into the Awards Management System.</p>	
Procedure 6 – Partners (Including Sub-awardees)		
1.	The National Safeguarding Team shall develop and maintain tools and guidance to assist programmatic and operational Divisions to assess the Safeguarding capacity of Sub-awardees and other partners, where appropriate.	National Safeguarding Team
2.	<p>Before providing programmatic funding to any Sub-awardees, and other partners where appropriate, the funding Division shall assess the partner's safeguarding policy framework and capacity. Depending on the results of the assessment:</p> <ul style="list-style-type: none"> Partners may be required to participate in a Safe Partnerships learning and review session delivered by the National Safeguarding Team during each programming cycle (e.g. annually); and SCUS may provide support to partners to build the partners' safeguarding capacities to ensure they are able to comply with SCUS' safeguarding standards. <p>NB: For Sub-awardees managed by Save the Children International, Save the Children International will be responsible for following their own established procedures for assessing partners.</p>	<p>Safeguarding Advisors & Focal Points (USP)</p> <p>Head, Compliance, Risk & Operations, Finance (for IP)</p> <p>National Safeguarding Team</p>

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3.	<p>SCUS agreements with Sub-awardees and other partners, when they are provided with access to SCUS program participants or their data, or as otherwise required by donor requirements, must include a commitment to comply with SCUS' Safeguarding Policy (or the Partner's own substantially similar policy, as determined by the Managing Director, Safeguarding) and pre-approved language from the Legal & Risk Management Division concerning procedures for reporting and investigating concerns involving breaches of the policy.</p> <p>NB: For Sub-awardees managed by Save the Children International, Save the Children International will follow their own requirements with respect to agreements.</p>	<p>Managing Director Finance Management, USP</p> <p>Head, Compliance, Risk & Operations, Finance (for IP)</p>
4.	<p>If SCUS receives a contract that contains FAR 52.222-50 Combating Trafficking in Persons or FAR 52.222-56 Certification Regarding Trafficking in Persons Compliance Plan and/or an award containing the ADS 303 Mandatory Standard Provisions on Safeguarding Against Exploitation, Sexual Abuse, Child Abuse, And Child Neglect (October 2023) or Trafficking In Persons (July 2015), the applicable provisions shall be flowed down in any subcontracts, subawards, or other procurement agreements issued pursuant to the award. Furthermore, SCUS shall notify its subcontractors, Sub-awardees, vendors, and agents, including SCI, of any new requirements, updates, changes to or clarification of the aforementioned requirements</p>	<p>Head, Compliance, Risk & Operations</p>
5.	<p>Sub-awardees and other partners, where appropriate, will be responsible for reporting safeguarding concerns related to SCUS funded activities, as outlined in SCUS Safeguarding Policy and Procedures. The partner will be responsible for conducting its own investigation into reported</p>	<p>Partners</p> <p>National Safeguarding Team</p>

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	concerns. Depending on the results of the safeguarding partner assessment, SCUS may investigate if the partner does not have the ability to carry out an investigation in a child and survivor-centered way and when agreed upon with the partner.	
Procedure 7 – Program Visits and Other Events		
1.	Any team that is planning a visit to a SCUS program site must provide the National Safeguarding Team with the names of the proposed Visitors, their states of residence, and the details of the proposed trip (including the names of all Staff who are participating) at least two weeks in advance of the trip. If a trip is planned less than two weeks in advance, information will be provided to the National Safeguarding Team as soon as it is available.	Division VP or their designee
2.	Based on the information provided, the National Safeguarding Team will indicate what safeguarding precautions are required for the Program Visit. At minimum, all Visitors must be checked against the National Sex Offender Registry and additional requirements – including appropriate staff to Visitor ratios – will be determined by the National Safeguarding Team.	National Safeguarding Team
3.	Staff organizing the Program Visit will provide all Visitors a copy of SCUS Safeguarding and Counter-Human Trafficking Policy and the Safeguarding Behavioral and Conduct Guidelines prior to the visit. Visitors will submit a signed policy acknowledgment to the site visit organizer. Divisions are responsible for maintaining the records of SGP acknowledgments and other related documentation for the purpose of reviews and audits.	Division VP or their designee

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4.	For other events involving in-person or online contact between Program Participants and individuals other than Representatives (Visitors), Divisions will consult with the National Safeguarding Team as soon as possible to discuss appropriate requirements and safeguarding precautions.	Division VP or their designee
Procedure 8 – Marketing, Media, and Advocacy		
1.	<p>The Marketing, Communications, and Fundraising Division will adopt and maintain standards for SCUS's collection of images, video, other recordings, and related data from program participants, their caregivers, and their communities for marketing, media/communications, and advocacy purposes. Where possible and appropriate, this may include the adoption of SCA-wide content guidelines. At minimum, these standards shall require:</p> <ul style="list-style-type: none"> • Obtaining assent from children and informed consent from adult program participants and caregivers; • Making certain that images and other information used do not include information that could be used to identify any Child, such as a child's full name, location and image; • Protecting against the collection or use of images, videos, or other recordings that would exploit Program Participants or place them at greater risk; and <p>Affirming that Child or Adult program participation will not be limited or restricted if they decline to assent/consent to participate in the fundraising, marketing, media, and advocacy processes.</p>	Chief Marketing Officer or their designee
2.	Images, video, or audio recordings for SCUS' use should be collected and stored on agency-owned devices wherever possible. Prior written approval from Division VP or Chief Marketing Officer must	Division VPs & Chief Marketing Officer

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	be obtained prior to using a personal device to collect images, video, or audio recordings for SCUS. Any content collected on a personal device must be transferred to an agency system as soon as possible and then deleted from their personal device. Staff must confirm in writing to their Division VP or the Chief Marketing Officer that the data has been removed.	
Procedure 9 – Reporting Procedures		
1.	The National Safeguarding Team will maintain current and publicized guidance for internal and external reporting of safeguarding concerns.	National Safeguarding Team
2.	Mechanisms for reporting safeguarding concerns that are child-friendly, accessible, confidential, and effective are in place and monitored.	National Safeguarding Team
3.	Reporting procedures must be easily accessible, known to, and understood by all program participants, their families, communities, Representatives, and employees of partner agencies.	National Safeguarding Team
Procedure 10 – Audit and Review		
1.	The National Safeguarding Team will oversee the Safeguarding Risk Management Framework and monitor compliance with the Safeguarding and Counter-Human Trafficking Policy, this procedure, and supporting documents. Based on that oversight and monitoring, as well as analysis of incidents, the National Safeguarding Team will prepare an annual workplan in coordination with other stakeholders to strengthen the Safeguarding framework at SCUS. Key findings and recommendations will be shared with the Senior Leadership Teams and Boards of Save the Children Federation, Inc., SCUS Head Start Programs, and Save the Children Action Network.	National Safeguarding Team

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2.	Global Assurance's (GA) will assess and incorporate safeguarding risk into its annual plan and audit engagements, as relevant and applicable. GA's work is risk-based, therefore safeguarding may or may not feature in a given year's plan. However, no more than three years will pass without either scoping safeguarding into an internal audit or performing a standalone audit of the current policy and procedures themselves.	Global Assurance (internal audit)
3.	As requested, SCUS will report to Save the Children International on Compliance with the standards set out in the Global Child Safeguarding Protocol.	National Safeguarding Team

Exception Approval Procedure

1.	Any exceptions to these Procedures must be requested in writing and approved by the Managing Director of Safeguarding and/or the General Counsel.	General Counsel
2.	Approvals will be kept on file by the requesting division for review and auditing purposes.	Division VP

Related Policies, Procedures, And Supporting Documents

Document	Purpose
Safeguarding and Counter-Human Trafficking Policy: Annex 2 - Safeguarding Policy Framework	The Safeguarding Policy Framework sets out the 'key documents' that detail the organization's safeguarding commitments and practices so that they can be consistently incorporated and operationalized.

Version Control

Version number	Version Date	Revisions made
SGP-01	3/25/2024	New Safeguarding Procedures to align with new comprehensive Policy to address PSEA, Adult Safeguarding, and Human Trafficking
CSP-01.7b	10/1/2020	N/A