POLICY DOCUMENT REF. NO: PCS.01

TITLE: Support to Life Child Safeguarding Policy

PURPOSE AND DESCRIPTION: This policy, procedures and guidelines declares Support to Life's commitment to child safeguarding.

ANNEXES:
- Annex 1: Support to Life Child Safeguarding Procedures PCS.01-P01
- Annex 2: Support to Life Child Safeguarding Code of Conduct PCS.01-C01
- Annex 3: Support to Life Child Safeguarding Conceptual Guide PCS.01-G01
- Annex 4: Support to Life Child Safeguarding Implementation Manual PCS.01-G02


SCOPE OF THIS POLICY: This policy applies to all parties below:
- **Support to Life Team Members:** Employees, members of the board of directors, representatives, consultants, interns, volunteers, persons who represent Support to Life on or off duty are all referred to as Support to Life Team Members.
- **Support to Life Partners:** All parties that receive funding from/provide funding to Support to Life, all sellers, procurers, contractors, sponsors, consultants, experts, trainers, non-profits that maintain relationships with STL, local authorities and all parties who profit from STL’s activities by means of providing products or services are referred to as Support to Life partners.
- **Support to Life Visitors:** All persons who visit Support to Life programs, offices or other STL activity locations and who may directly indirectly come in contact with children (journalist, politicians, researchers, reputable persons, etc.)

RESPONSIBLE PARTIES: Support to Life Director has an overall responsibility, while all managers and team leaders have the responsibility to ensure that all team members receive, understand and implement the policy document.

STATUS: Approved on 12 September 2018

EFFECTIVE: when approved

LAST REVISION: N/A

AUTHOR(S): Aslı Silahdaroğlu Bekmen, Institutional Development Department Manager

APPROVED BY: Sema Genel Karaosmanoğlu, Support to Life Director

---

1 Article 6 - (1) Judicial and administrative authorities, law enforcement officers, health and education institutions and non-governmental organizations have the obligation to notify the Social Services and Child Protection Agency of any juveniles that are in need of protection. The juvenile and the persons who are responsible for the care of the juvenile can apply to the Social Services and Child Protection Agency to take the juvenile under protection. (2) The Social Services and Child Protection Agency shall immediately carry out the necessary enquiry regarding the events notified to it.
CHILD SAFEGUARDING POLICY STATEMENT

STL is pledged its commitment to conducting all its humanitarian work in a manner that is safe for children who receive services from STL, or who are accompanied by individuals STL is in contact when delivering its humanitarian work.

STL recognizes the rights of the child as stated in the UNCRC 1989, and the Minimum Standards for Child Protection in Humanitarian Action within the Global Protection Cluster. STL recognizes that children and young people are more vulnerable than adults and deserve particular attention and protection. STL advocates that this attention and protection should be reinforced further in emergency situations and disasters – putting people under increased vulnerability and extreme pressure.

STL is committed to:

- Promoting equal opportunities to all children in all STL activities and issues related to children.
- Planning and implementing all its activities with an outlook for the child’s best interest; in a manner that is in accord with the child’s survival and development.
- Prioritizing and upholding the child’s best interest in any decision-making process.
- Acknowledging the significance of parents, families and other care-givers in the life of a child.
- Informing children through dialogue that relies on mutual respect and sharing of authority so as to enable child’s participation.
- Acknowledging child safeguarding as a fundamental pillar when doing its work, and mainstreaming it.

With this Child Safeguarding Policy, Support to Life pledges to create a risk-free environment for children and sustain it. Support to Life conducts its programs and operations in a manner that is safe for children receiving its services or children that are under the guardianship of those who receive STL’s services. To this end, Support to Life prohibits all actions or inaction that may intentionally or inadvertently give rise to risks of child abuse.

All persons that fall within the scope of this policy have an obligation to read and understand this policy as well implement it in their personal and professional life. All types of actions or inaction that may lead to any type of child abuse is explicitly prohibited for all Support to Life team members, partners or visitors. The parties in question are expected to conduct themselves in a manner consistent with the commitments and obligations of this policy. Any violation of this policy will be treated as a serious issue and will result in disciplinary action being taken, including termination of contract and/or any other available legal remedy.

This policy commands that:

- STL establishes and maintains systems which promote awareness of child safeguarding, enable the prevention of harm, facilitate the reporting of and responding to safeguarding concerns.
- Everyone associated with STL is aware of their obligations and responds appropriately to issues of child abuse.
- STL recruit members who are suited to work with children and to apply strict child safe recruitment practices.
- All STL activities and programs are assessed for risks to children which are reduced or removed by all means within STL control.
CHILD SAFEGUARDING PROCEDURES

In furtherance of the Policy on Child Safeguarding, STL has adopted the Procedures below:

1  PREVENTION OF CHILD SAFEGUARDING INCIDENTS

STL strives - through awareness, good practice and training - to minimize the risks to children and take positive steps to help protect children who are the subject of any concerns.

1.1 Mitigating Child Safeguarding Risks in Operations

Support to Life team members have an obligation to read, sign and implement Support to Life Child Safeguarding Code of Conduct (CSCoC). In order to ensure the safety of all children Support to Life is in contact with, Support to Life Child Safeguarding Policy, Code of Conduct and their annexes must be disseminated to all STL team members. Any violation of CSCoC will lead to disciplinary action as stated by Support to Life Human Resources Guidelines. STL also commits to cooperating fully in any investigation of concerns and allegations against STL team members and anyone STL is in a contractual relationship with.

STL team members treat children and adults equally and with respect, using non-violent, non-discriminating, positive and constructive language and behaviour. STL is committed to ensuring that STL members adopt exemplary behaviour towards children in their professional and private lives. Any STL team member who commits child abuse or executes inappropriate behaviour outside working hours are also submitted to the disciplinary procedure stated in STL Human Resources Policy.

STL team members should not place themselves in compromising or vulnerable positions and should take care not to discriminate against, show differential treatment towards, or favour particular children to the exclusion of others.

STL team members encourage child participation in the design and implementation of all activities with children and relating to children’s rights. They provide children with information about what is and is not acceptable behavior towards them and what they can do when their safety is at risk.

STL has “Child Safeguarding Focal Points” at each mission, who are trained on the specifics of the processes around child safeguarding. The Child Safeguarding Focal Point persons are known by all staff members,
partners and guests, as well as the children themselves. In addition, a Child Safety Network document is created and shared publicly in each location, indicating clearly the child safeguarding resources, safe places, authorities and ways to access emergency medical help if the necessity arises.

It is the duty of all STL team members to ensure that child safeguarding risks are identified and minimized from the planning stage through to the implementation stage of activities. Safeguarding must be considered at every stage, from project/program design and must be reviewed regularly as part of the monitoring of the project’s implementation. In addition to program design, when conducting activities (inside or outside the workplace) a risk assessment must be undertaken to identify any potential dangers and a plan must be put in place to minimize these risks.

1.2 Background Checks and Recruitment Process

Support to Life’s selection and recruitment process (described in detail within STL Human Resources Guidelines) aims to enable the recruitment of trustworthy and qualified individuals, especially those that will be especially if they will be directly with children. Any activities involving children are designed and supervised by qualified staff, aware and capable of managing circumstances which may present risks to children.

1.3 Compliance of agreements with STL partners to STL Child Safeguarding Policy

All agreements with partners must include this policy as an addendum and must include a provision in which the partner agrees to comply with this policy.

2 REPORTING OF CHILD SAFEGUARDING INCIDENTS

STL has agreed on a strict procedure in the incident of any form of child abuse. It is not STL’s role to determine whether a child has been abused, but we commit to hearing and taking into account any allegation of child abuse and to respond to and refer any concern to appropriate authorities.

The STL Community Feedback and Complaint Mechanism provides clear procedures and step-by-step guidance on what actions to take when a concern regarding a child’s safety or wellbeing arises. STL ensures that all STL members know the steps to take and whom to contact where concerns arise regarding the safeguarding of children, and they report the concerns to relevant internal and external authorities.

Reporting specifics are as follows:

Support to Life team members must report any suspicion of misconduct covered by this policy as soon as practicable and maximum within 24 hours to their direct supervisor. If they are under the impression that they cannot voice their concerns to the unit they are in/they are visiting, or if they are not an STL team member, they can express their concerns by mailing to etik@hayatadestek.org in accord with the principle of confidentiality.

All managers who are informed of a potential violation of Support to Life Child Safeguarding policy must send an e-mail to etik@hayatadestek.org as soon as practicable and maximum within 24 yours.

The reporting focuses simply on the communication of available information; it does not entail a research or investigation procedure.

A reporting e-mail should always include:

- Date, time and location of the incident (when and where)
- Type of incident (abuse, violence, inappropriate behaviour, etc.) (what happened?)
- Nature of what happened (who was involved and how?)
STL engages in action that supports and protects children when concerns arise regarding their well-being; supports those who raise such concerns; investigates, or cooperates with any subsequent investigation; and takes appropriate corrective action to prevent the recurrence of such activity.

In cases related to child abuse, the Ethics Committee will adopt temporary measures to protect the alleged victim, within 48h of the acknowledgement of the complaint and until the investigation is concluded. Cases associated with child abuse are prioritized by the Ethics Committee and are resolved within a month after the initial complaint is received.

Cases that can cause serious damage to Support to Life's standing are immediately reported to the Director and to the Child Safeguarding Focal Person in the Board of Directors. In this type of exceptional circumstances, Ethics Committee may consult an external partner to evaluate the allegations. The board of directors is obliged to disclose the incident to relevant public authorities if there is the possibility that the alleged actions constitute a breach of law. In such cases, in order to surmise whether the allegations are substantiated or not an internal investigation is conducted in addition to the investigation of legal authorities.

4 TRAINING TO PROMOTE AWARENESS OF STL CHILD SAFEGUARDING OBLIGATIONS

STL ensures that all STL members are notified of and made aware that they are expected to comply with the STL Child Safeguarding Policy.

The policy is accessible to all STL members in English, Turkish, and Arabic in the STL database. In addition, it is posted on STL website as well as the walls of its Community Centres and STL Hubs and offices. All STL members, partners and guests are given a copy of the Policy and related documents at the beginning of their engagement with STL. STL members, partners and guests are expected to follow the clearly indicated procedures in these documents to keep children safe.

All STL members receive a comprehensive induction and yearly refresher trainings into STL’s Child Safeguarding Policy and all related documents. The aim of the training is to transfer the appropriate practices and behaviours for child safeguarding to all relevant individuals and to ensure they claim responsibility and perform to their best ability in keeping children safe. It is also advisable to provide partners and guests with a child safeguarding induction training, even if they will not necessarily have direct contact with children.

All programs and activities of STL are designed to encourage child participation. Children are provided with information about what is and is not acceptable behaviour towards them and what they can do when their safety is at risk. The Child Safeguarding Focal Point persons are known by all STL members and the children themselves.

5 MONITORING AND REVIEWING STL CHILD SAFEGUARDING POLICY AND PROCEDURES

The STL Child Safeguarding Policy document, the Child Safeguarding Code of Conduct and all related documents are monitored and reviewed by the STL Child Safeguarding Quality Committee, considering the feedback of STL members and partners, including families and children. The Ethics Committee will appropriately record and monitor all complaints and allegations regarding child safeguarding and making this information available on request of authorities, according to confidentiality procedures and for complete transparency in line with the internal and external compliance procedures.
6 COMPLIANCE WITH LAW AND INTERNATIONAL STANDARDS

STL ensures compliance with Turkish Republic Laws where applicable. STL also ensures compliance with the host country and local child welfare and protection legislation, or international standards, whichever affords greater protection.

6.1 Prohibition and debarring from Sexual Activity with Children

Any individual under the age of 18 is a child and is “underage”. A child cannot give informed consent to sexual activity. STL considers that sexual activity with a child will be treated as a serious issue and will result in disciplinary action being taken, including termination of contract, and the pursuit of any other available legal remedy.

6.2 Confidentiality for Child Safeguarding

STL respects each child’s right to privacy. Particular attention is given to the way children’s information, photographs, videos and stories are circulated with an eye for the risks for the children if such data fall into the hands of ill-intentioned people.


STL members must keep all information about any suspected or reported incidents strictly confidential, and must divulge such information only to the staff the incident is reported to, or to the senior staff directly involved in the investigation.

7 FURTHER NECESSARY ARTICLES, INCLUDING POLICY RELATED ISSUES AND THE PROCEDURE OF ITS IMPLEMENTATION

Annex 4: Support to Life Child Safeguarding Implementation Manual provides further guidance and tools such as role definitions, risk assessment, contracting with partners. It is designed to enable STL managers establish effective child safeguarding measures in their respective scope of authority.