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# MSI Child Safeguarding Policy

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## 1. Introduction

MSI Reproductive Services (**MSI**) provides sexual and reproductive healthcare through its Global Partnership, including our head office in London, and offices in 36 countries around the world (**Country Programmes**). Through our work, we encounter vulnerable adults, young people and children requiring healthcare advice and support. The safety and welfare of adults, young people and children is of paramount importance to MSI, and we recognise our duty to ensure that all children and young people are adequately safeguarded in our care.

MSI believes that every child (as defined in section 3.2 of this Policy) has an inherent right to live free from violence, exploitation, abuse, harassment, and neglect and is committed to upholding the UN Conventions of the Rights of a Child. Our programmes have a responsibility to operate in accordance with the principle of 'do no harm' and take active measures to mitigate risks of children experiencing harm or abuse, whether intentional or unintentional.

Abuse and exploitation are more likely to occur where individuals are vulnerable and/or dependant on those who may seek to exploit their position of power for their own personal gain. We recognise the potential for an unequal balance of power between representatives of MSI and the children and young people they interact with. All representatives of MSI are therefore expected to uphold the highest ethical standards when interacting with children in both a professional and personal capacity. The welfare and protection of children must always be prioritised.

MSI's approach to Child Safeguarding is set out in this document in the sections summarised below. There is a separate policy that deals with Adult Safeguarding.

**Section 1: Introduction**

**Section 2: Scope and Purpose:** who is covered by this policy, that the policy applies inside and outside of work, and the other policies which should be read with this Child Safeguarding policy.

**Section 3: Definitions:** how we define Safeguarding, children and types of abuse.

**Section 4: MSI's Child Safeguarding Commitment:** what is involved in our commitment to safeguard children, clients, team members and MSI and the importance of our Code of Conduct

**Section 5: MSI's Safeguarding Programme Overview:** the MSI approach to *Preventing* (section 5.1) and *Responding* (section 5.2) to incidents and sets out the core implementation requirements for this safeguarding programme. In section 5.2 it sets the time limits for reporting incidents and how incidents are handled.

**Section 6: Roles and Responsibilities:** the different roles responsible for implementing this policy

**Section 7: Child Safeguarding Standards and Expectations:** this sets out specific expectations and ways of working with people in order to reduce the risk of safeguarding allegations or incidents.

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## 2. Scope and Purpose

- 2.1. This document sets out MSI's standards and expectations for safeguarding children and young people, and preventing them from experiencing exploitation, abuse, or harassment within our care.
- 2.2. This document does *not* provide guidance on consent procedures for children and young people seeking our services. For guidance on consent please consult [MSI's Global Medical](#)

[Development Team.](#)

- 2.3. This policy applies to all persons at MSI, including all employees, contractors, trainees, volunteers, sessional workers, and agency / locum staff workers (collectively, **MSI People**, and individually, an **MSI Person**).
- 2.4. The principles in this Policy are also expected to be upheld by MSI's partners, including social franchisees, consultants, suppliers, interns, visitors, external partners and any other third parties receiving funds or any kind of support from MSI (**MSI Partners**).
- 2.5. Visitors to MSI's programmes e.g., donors, partners, journalists should be briefed on MSI's approach to Child Safeguarding and made aware of that the principles of this policy apply to them whilst visiting our programmes.
- 2.6. This policy applies both during, and outside normal working hours. Child abuse or exploitation, or any behaviours which could be seen to violate the ethical standards of this policy will be investigated and responded to in line with Section 5.2.2.
- 2.7. This Policy should be seen as part of a group of policies which deal with the welfare of all who come into contact with MSI, including our clients, our staff and partners, and the communities in which we work:
  - [MSI's Code of Conduct](#)
  - [MSI's Adult Safeguarding Policy for International Operations](#)
  - [MSI's Anti-Modern Slavery and Human Trafficking Policy](#)
  - [MSI's Sexual Harassment Policy](#)
  - [MSI's Speaking Up Policy](#)
  - [MSI's Policy on Client Counselling and Informed Consent](#)
  - [MSI's Duty of Care for Service Providers](#)
  - [MSI's Guidance on Safeguarding Clients and Staff During Site Visits](#)
  - [MSI's Operational Guidance for SGBV](#)
  - [MSI Commitment to Gender Equality](#)
  - [MSI Global Equality and Diversity Policy](#)

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## 3. Definitions

**3.1. Safeguarding** is the responsibility organisations have to ensure their staff, operations, and programmes do no harm to children vulnerable adults and people delivering their services, and that they do not expose them to the risk of harm and abuse.

**3.2. A Child** is any person under the age of 18, regardless of whether a nation's laws recognise adulthood earlier.

**3.3. Types of Harm**

- **Child abuse** is any action, inaction, or threat of action by an individual which causes harm to a person under the age of 18. This can include physical abuse, emotional abuse, neglect, and sexual abuse. Abuse can occur in person, or online.
- **Child exploitation** means any actual or attempted abuse of a child's vulnerability via force or coercion for the sexual, social, political, or monetary benefit of another. Note this includes child labour and trafficking.
- **Sexual abuse** meaning actual or threatened physical intrusion of a sexual nature, whether by force or under unequal coercive conditions.
- **Sexual exploitation** meaning any actual or attempted abuse of position of power or trust for sexual purposes (for example, asking a person to engage in sexual activity in order for them to obtain a service or employment) including, but not limited to, the exchange of money, employment, goods or services for sex, including sexual favors.
- **Sexual harassment** meaning any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any behaviour of a sexual nature that might reasonably be expected, or be perceived, to cause offence or humiliation to another.
- **Online child sexual abuse and exploitation** meaning the use of technology or the internet to facilitate the sexual exploitation of a child, including the production and sharing of child sexual abuse material online. The most common forms of online child sexual exploitation includes grooming, live streaming, consuming child sexual abuse material, and coercing and blackmailing children for sexual purposes.
- **Discrimination** is any form of unfair or prejudicial treatment of a person based on their characteristics such as: age, disability, nationality, ethnicity, indigeneity, religious or political belief, socio-economic status or caste, family or criminal background, sexual orientation or gender identity, marriage status, pregnancy, or HIV/AIDs status.
- Emotional abuse refers to the wilful infliction of mental suffering on a child (e.g., through acts of intimidation, humiliation, threats, denial of respect and dignity) or repeated failure to respond to a child's emotional needs. Such acts can damage a child's self-esteem or social competence.
- **Neglect** is where a person intentionally fails to provide a child with the conditions that are culturally accepted as being essential for their physical and emotional development and wellbeing such as food, shelter, or education.
- **Physical abuse** occurs when a person purposefully injures a child, for example, slapping, hitting, punching, shaking, kicking, burning, restraints, or misuse of medicines etc.

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## 4. MSI's Child Safeguarding Commitment

- 4.1.** MSI acknowledges that in the delivery of our services, there is a potential to increase safeguarding risks to those under the age of 18 through how we conduct our programming, for example, whilst delivering clinical services in centres or outreach, throughout community engagement or whilst conducting research or data collection activities. We take our duty of care for safeguarding very seriously. In doing so we are committed to:
- **Safeguard children** by ensuring all those under 18 years in our care are treated sensitively and their rights are respected. Our programmes aim to assess risks and work to actively minimise the likelihood of children experiencing intentional or unintentional harm, exploitation abuse, and harassment as a consequence of our work. Where harm, abuse or exploitation of a child does occur within our operations, MSI will respond quickly to support survivors of abuse and prevent ongoing and future risks of harm.
  - **Safeguard MSI** by demonstrating a genuine commitment to safeguarding our clients and staff and preventing cases of abuse from happening. In doing so we continue to safeguard MSI's reputation and our ability to continue to deliver on our mission, for the ultimate benefit of the

clients and communities we serve.

**4.2.** MSI's commitment to child safeguarding is guided by the following principles articulated within the MSI Code of Conduct:

- **Zero tolerance:** MSI does not tolerate any form of abuse or exploitation by anyone who works for, or is associated with the organisation in any capacity. There are always consequences for substantiated concerns of such behaviour, up to and including dismissal.
- **Strong leadership:** MSI recognises that to change culture and prevent any form harm, exploitation, abuse or harassment, strong leadership modelled on respect and equality that promotes a safe and supportive organisational culture which prioritises safeguarding and speaking up is required.
- **Empowerment and Client-centred Care:** MSI promotes a culture which puts the clients interests first, where children and young adults are treated with genuine care and compassion, and feel safe and able to make informed decisions about their care, provide feedback and speak up when something doesn't feel right.
- **Non-discrimination:** MSI is committed to safeguarding all vulnerable individuals within our operations regardless of their: age, disability, nationality, ethnicity, indigeneity, religious or political belief, socio-economic status or caste, family or criminal background, sexual orientation or gender identity, marriage status, pregnancy, or HIV/AIDs status.
- **Shared responsibility:** All representatives of MSI have an equal duty to ensure children and young adults are treated with care and respect, and speak up if they are not.
- **Confidentiality:** Safeguarding children from harm, also means safeguarding their right to privacy and confidentiality in line with MSI's Data Privacy Standards and local legislation.
- **Prevention:** MSI understands that risks of child abuse within MSI's operations are real, and may be under-reported. We are committed to identifying areas of our work where concerns are more likely to arise and put in place mitigations to change behaviours to prevent abuse, harassment, and exploitation.
- **Partnership:** Communities can help prevent, detect, and report incidents of exploitation, abuse and harassment. MSI expects all staff to be open to receiving community feedback. Where possible MSI will form strategic partnerships with existing services and experts in the community who are able to provide specialist support to survivors of abuse to ensure MSI is able to care for those who may experience abuse within MSI's operations. Further details are outlined in Section 5.2.2. (c).
- **Survivor-focused:** All reported violations of this policy will be managed in a way which prioritises the best interests, welfare and protection of the child. All safeguarding concerns will be handled sensitively, confidentiality will be maintained at all times, and support will be provided to survivors where necessary.
- **Accountability and Transparency:** MSI has mechanisms in place to ensure all management and team members uphold their duties and responsibilities for safeguarding children, and is committed to transparent reporting on safeguarding incidents.

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## 5. Objectives of MSI Safeguarding Programme

MSI's Safeguarding Programme sets a benchmark of good practice and accountability with the aim to:

- **PREVENT** incidents of child abuse, exploitation, and harassment from occurring across the MSI Partnership.
- **RESPOND** quickly and sensitively to any safeguarding incidents that do occur.

## 5.1 PREVENTION

### 5.1.1. TRAINING

Every MSI Person and Partner has a role to play in safeguarding all children. To fulfil that role effectively and with confidence, all MSI Persons must complete a safeguarding induction training during onboarding and every two years thereafter. Additionally, all MSI Persons are required to complete refresher training, at least once every 2 years. We recommend that such training is scenario or case study based, to enable staff to consider actual issues and events that they may come across. This ensures they have a clear understanding of:

- the ethical standards of conduct expected of them
- the behaviours which constitute child abuse or exploitation, and other forms of individual harm which violate MSI's Safeguarding Policies
- their duty to report all known, or suspected, child safeguarding concerns
- how to sensitively respond to child safeguarding concerns and use MSI's Speak Up Channels to report issues

Trainings are expected to be supported through continuous messaging and discussions across all levels of the organisation.

### 5.1.2. SAFE RECRUITMENT

MSI is committed to recruiting safe people, whom we can trust to uphold our commitments to safeguarding and client-centred care, ensuring children are not put at risk by our staff. For this reason, MSI employs a range of safe recruitment practices. These procedures not only aim to identify high-risk individuals, including potential child abusers, and those unlikely to treat children with dignity and respect, but to make our child safeguarding commitments clear to candidates, deterring unsuitable individuals from applying. These are:

- Direct and indirect contact with children:** Identify positions that have 'direct' and 'indirect' contact with children, in order to determine and keep track of 'higher risk' positions, which may require more in-depth screening, training, and monitoring.
- Job advertisements and job descriptions:** include a statement of commitment to adult and child safeguarding, **informing** perspective candidates about the values and behaviours they will be expected to uphold and that MSI conducts background checks on all new hires.
- Interviews:** recruiters ask values-based interview questions, designed to assess whether candidates' values and behaviours align with that of MSI's and to identify and rule out candidates unsuitable for working with children and vulnerable adults. For positions, identified as direct contact with children, candidates are asked behaviour-based interview questions to draw out peoples' attitudes and values towards children, child rights and child protection, as well as requesting clarifications for inconsistencies and gaps in the candidate's past or their CV.
- Background checks:** the following checks are carried out for all successful candidates before employment is confirmed:
  - Candidates' identity, right to work and qualifications are verified to confirm that they are who they say they are, and they have the required qualifications.
  - Criminal background checks (where available in country) and database vetting checks to identify concerns relating to money-laundering, terrorist activities, or past criminal convictions.
- Reference checks:** Verbal or written references are obtained from at least 2 of candidates most recent employers. References for roles with direct contact with clients should enquire about the candidate's suitability to work with children and vulnerable adults.

- f. **Compliance declaration:** All candidates complete and sign a Compliance Declaration, declaring any past misconduct and confirming their commitments to adhering to the standards and behaviours outlined within MSI's Code of Conduct.
- g. **Employment contracts:** Employment contracts and/or human resources policies and procedures contain provisions for disciplinary sanctions such as: dismissal, suspension with or without pay pending outcomes of an investigation, and suspension or transfer to other duties for any employee who is under investigation for breaching the MSI Code of Conduct and/or MSI Policies including the child safeguarding policy and adult safeguarding policy.

Successful candidates must pass through all MSI's safe recruitment procedures and demonstrate a commitment to safeguarding. Recruitment documentation is securely maintained within the employees file throughout their employment.

### 5.1.3. RISK MANAGEMENT

MSI is committed to identifying the areas within our operations where there is increased potential for children to be harmed by our operations, including through programme design or at the hands of MSI People or MSI Partners. By assessing our risks, we can identify mitigations designed to prevent safeguarding concerns from occurring and strengthen our responses to any incident which does occur. MSI employs the following risk management approaches:

- a. **Safeguarding Risk Assessments:** Country Programmes are required to maintain a Safeguarding Risk Register reflecting the unique contexts and safeguarding risks faced within the programme including child safeguarding risks. Throughout the risk assessment risks are scored according to their likelihood and severity, mitigations identified, and risk managers assigned to monitor the risks and ensure mitigations are implemented effectively. Safeguarding Risk Registers are submitted to the Global Safeguarding Team and reviewed by the Country Programme on an annual basis. [See – [CP Safeguarding Risk Assessment](#)].
- b. **Safeguarding Annual Self Audit:** - Country Programmes are required to review how well they are implementing the safeguarding programme by undertaking a self-assessment annually. The results of this assessment will guide the Country Programme management on areas on need to focus, to better manage safeguarding risks. [See- [CP Safeguarding Self-Audit](#)].
- c. **External Partner Due Diligence:** MSI conducts due diligence assessments on external partners (i.e., a non-profit or commercial entity receiving funds from MSI to deliver on programmes MSI is accountable for), prior to entering a formal agreement in order to identify and mitigate risks associated with the partner. Within this assessment the partner's safeguarding policies, processes and procedures are evaluated and contractual requirements outlined to reduce the likelihood that children or vulnerable adults are harmed by the External Partner. Where safeguarding incidents do occur, External Partners are required to notify MSI immediately (within 24 hours) by emailing [incidents@msichoices.org](mailto:incidents@msichoices.org).
- d. **Safe Programming:** MSI's programme activities are designed in a way which prioritises the best interests of the client. Programme designs consider measures to protect children and vulnerable adults from exposure to unnecessary risks of harm, safeguard personal data and ensure that client participation is inclusive and voluntary.

### 5.1.4. CODE OF CONDUCT

The Code of Conduct provides guidance on the organisational values and standards MSI People are expected to adhere to as representatives of MSI, both inside and outside of the workplace. This includes the professional boundaries and behaviours expected of them when interacting with children. All team members sign a declaration of their commitment to adhere to the standards outlined within the Code of Conduct.

MSI expects similar standards of conduct from MSI Partners, including social franchisee's, entrepreneurial MS Ladies, referral partners, sales representatives, consultants, suppliers, external partners, as well as visitors to MSI service delivery points who have direct contact with children. Partners and visitors may be asked to read, and sign to acknowledge adherence to MSI's Code of Conduct or Business Partner Code of Conduct.

## 5.2 RESPONDING

### 5.2.1. SPEAKING UP

We are committed to preventing harm to children under MSI's care. However, like all organisations, we face the risk of our activities going wrong and children experiencing harm, abuse, or exploitation at the hands of an MSI Person or Partner, whether intentionally or unintentionally. As "One MSI", we need to work together to identify situations where this is happening, in order to rectify the issue and provide support to at-risk children.

MSI People and Partners, as well as clients and community members should feel encouraged to Speak Up about any concerns relating to a known, or suspected incident of child abuse, exploitation or harassment, or any other violation of MSI's Code of Conduct or Safeguarding Policies by an MSI Person or MSI Partner. Concerns discovered by MSI People or Partners must be raised immediately to enable the organisation to act quickly to protect children from potentially ongoing risks of harm.

- a. **MSI team members** can raise concerns by:
  - Speaking with their Line Manager
  - Speaking with the Country Director (in the case of Country Programmes)
  - Speaking with their team Director or the Safeguarding Lead (in the case of Support Offices)
  - Contacting SafeCall, a confidential and independent speaking up service. SafeCall can be accessed via:
    - Telephone: see [here](#) for country telephone numbers
    - Online: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)
    - Email: [speakingup@safecall.co.uk](mailto:speakingup@safecall.co.uk)
- b. **MSI Partners** can raise concerns via the agreed reporting channels outlined within their contractual agreement e.g., by:
  - Speaking with the MSI Country Director
  - Emailing MSI's Partner Incident Reporting account: [incidents@msichoices.org](mailto:incidents@msichoices.org)
- c. **Clients and community members** can raise their concerns by:
  - Speaking directly to an MSI team member
  - Getting in touch with the country programme Contact Centre

The Speak Up Channels are advertised via client-facing and staff-facing [Speak Up Posters](#) visible across MSI's offices and service delivery sites.

Further guidance on how to speak up and what happens after you speak up, including how MSI supports report raisers, can be found in in the following documents:

- [MSI's Speak Up Policy](#)
- [A Guide to Speaking Up](#)

### 5.2.2. INCIDENT RESPONDING

MSI is committed to taking a survivor-focused approach to incident management, whereby the safety and wellbeing of those affected by safeguarding concerns remains the overriding priority at all times. We have in place robust reporting and responding procedures to ensure concerns are handled quickly, efficiently and through a survivor focused lens.

- Escalation:** Reports of any potential breach of MSI's Safeguarding Policies received by MSI team members and Line Managers must be escalated to the Country Director, their delegate, or the Safeguarding Lead and logged on the Global Safeguarding Incident Register within 24 hours. Reports received via SafeCall or the Global Safeguarding Teams are logged on the register by the Global Safeguarding Team within 24 hours. In instances where there are reasons to believe that an allegation is not credible, the Country Director may have 72 hours to assess and report the allegation on the register. The Global Safeguarding Decision Committee is then automatically notified of all safeguarding new cases but will take no further action if a case has been marked closed and no concerns are raised after a review.
- The Global Safeguarding Decision Committee:** ensures consistency in the management of safeguarding cases across MSI Country Programmes. They review all reports and provide guidance on survivor and/or report raiser support and protection, investigations, outcomes, disciplinary action (where required) and external reporting requirements, including transparent reporting to MSI's Donors and the UK Charity Commission within required timeframes. The Decision Committee also provides recommendations on actions required to prevent repeated similar incidents from occurring across the organisation.

The Decision Committee can be comprised of the Chief Operating Officer, Regional Director, Country Director, Global Director of Legal, Safeguarding and Donor Compliance, Global Director of People & Culture and Director of Global Programmes, Philanthropy and Global Funding and Multilateral Programmes. Other expertise is seconded as needed.

- Any concerns raised about members of the Decision Committee can be logged on a Restricted Register and managed by a Restricted Decision Committee. **Survivor Support:** It requires courage to speak up about abuse. In many cases victims may have been wrongly made to feel as if they were to blame, and they are likely fearful of what their abusers would do if they found out they reported. Recognising this MSI encourages team members to adopt the LIVES approach.<sup>1</sup> when listening to reports of abuse, to help survivors feel safe, protected, and supported.

**Listen** closely with empathy and no judgement  
**Inquire** about needs and concerns  
**Validate** their experience, show you understand  
**Enhance** their safety and do no harm  
**Support** them to connect to additional services

Where available MSI will identify organisations where survivors can be referred for specialist support, such as psychosocial support, comprehensive sexual, gender-based violence

<sup>1</sup> WHO 2013

(SGBV), forensic examination, legal support, on-going medical assistance, protection, and follow-up care. The organisations/facilities identified must demonstrate adequate standards of care and treatment, and assurances of their commitment to maintain confidentiality and provide quality and sensitive care must be gained, ideally in a written agreement.

- d. **Investigations:** Incidents relating to an MSI employee, contractor, agency / locum team member, social franchisee or MS Lady will either be conducted by the Country Programme or support office, with external expertise sought as required. Incidents relating to an employee of an external partner including the Public Sector will be managed in line with the partners internal investigation procedures. At all stages of the investigation and following the closure of the case MSI is committed to maintaining the privacy and confidentiality of all parties including any survivors, the report raiser, and the accused.
- e. **Disciplinary Action:** Child abuse, exploitation and harassment are serious offenses. Where cases are substantiated, the Country Programme will apply appropriate sanctions, which may include:
- Dismissal
  - Non-renewal of contract (for partners, locums, or fixed term employees)
  - Termination of agreements (for partners)
  - Warning
  - Increased supervision
  - Re-assignment of duties or location
  - Training or re-training

Where a potential criminal offence or serious duty of care violation has occurred the Decision Committee will review whether the case should be reported to the relevant authorities and/or licensing bodies, taking into account legal advice and the best interests of the child.

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## 6. Key Roles and Responsibilities

### 6.1. All MSI People and Partners

All representatives of MSI share an obligation to learn what is required, consider their own behaviours and actions, and prevent, report, and respond to child safeguarding concerns. MSI people are expected to uphold MSI's Child Safeguarding Policy, abiding by the standards and expectations outlined within Section 7 and report any known or suspected violations of this policy via MSI's Speak Up Channels as outlined in within Section 5.2.1.

### 6.2. Global Safeguarding Team

The Global Safeguarding Team are accountable for the development and implementation of the safeguarding programme across the global partnership. The Safeguarding Team develops policy and guidance, designs behaviour change initiatives and trainings and provides one-to-one support to country teams. The Safeguarding Team also monitors country compliance and provides updates on safeguarding activities, risks, and incidents to the MSI Board of Trustees and MSI's Donors.

### 6.3. Country Directors

Country Directors (CDs) are responsible for their Country Programme's compliance with this policy and relevant donor expectations for child safeguarding. CDs have a duty to ensure the Country Programme has in place the appropriate mechanisms, systems, and resource to effectively implement all components of the Child Safeguarding Policy. CDs must provide clear guidance to team members on how to prevent child safeguarding incidents from occurring within

their programmes. CDs must encourage confidence in MSI's safeguarding programme by promoting a safe and supportive organisational culture which prioritises safeguarding and speaking up. Report raisers should not feel victimised for speaking up. The CD has the responsibility of protecting report raisers and victims of safeguarding. Where potential child safeguarding concerns are identified within MSI's operations or that of our partners, the CD is responsible for ensuring incidents are responded to in line with Section 5.2.2. of this policy.

#### **6.4. Safeguarding Leads**

Every Country Programme has in place 1 or 2 nominated Safeguarding Leads. Safeguarding Leads have a duty to support the CD in ensuring the programme complies with the Child Safeguarding Policy and relevant donor expectations. Safeguarding Leads foster a caring and safe culture within the country programme by delivering safeguarding training and continuous messaging designed to promote ethical behaviour change, identifying potential safeguarding challenges, including lack of acceptance of the safeguarding programme, promote the use of safe recruitment practices and reporting requirements and processes, ensure child safeguarding risks are assessed and mitigated against, and make sure that where incidents do occur, they are quickly and sensitively responded to in line with the best wishes of the survivor. Safeguarding Leads are expected to actively engage with the Global Safeguarding Community of Practice, a forum which provides a space for peer-to-peer learning and sharing of best practice and common challenges.

#### **6.5. Managers**

Managers have a responsibility to ensure all those working for them understand and comply with MSI's Child Safeguarding Policy. Line managers have a duty to act as role models, practice safe recruitment and ensure staff are thoroughly sensitised on MSI's safeguarding policies, the Code of Conduct and Duty of Care (for clinical staff) through regular discussions. Where Managers become aware of suspected or known safeguarding concerns they must ensure this is escalated to the Safeguarding Team, Country Director or Regional Director within 24hrs. Managers must also ensure performance management of staff supports an accountable and safe organisational culture.

#### **6.6. Human Resource Teams**

Human Resource Teams have a responsibility to ensure the Country Programme and Support Office implements robust safe recruitment practices, all staff complete mandatory training on MSI's Code of Conduct, safeguarding and provider's duty of care (for clinical staff). HR Teams must also ensure that HR and performance management processes support an accountable and safe organisational culture. Where HR team members come across potential safeguarding concerns, these must be escalated to the Country Director or Safeguarding Team within 24hrs.

#### **6.7. Programme and Channel Leads**

Channel Leads are responsible for assessing and mitigating child safeguarding risks unique to their programme activities. This includes raising awareness of MSI's Speak Up Channels and how they can be used to report safeguarding concerns by staff, partners, clients, and community members, escalating potential safeguarding concerns to the Country Director and/or safeguarding lead, Programme Leads must also ensure relevant donor expectations for safeguarding are complied with.

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## 7. Child Safeguarding Standards and Expectations

MSI People and Partners are expected to comply with the following standards of conduct:

### 7.1. At all times (whilst carrying out professional activities or whilst acting in a personal capacity outside of work) MSI People and Partners will:

- Treat all children with dignity and respect regardless of their age, disability, socio-economic status, religion, race, caste, indigeneity, ethnic group, sex, gender identity, sexual orientation, or any other characteristic.
- Not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, humiliating, demeaning or culturally inappropriate.
- Not abuse their position to withhold professional assistance or services, or give preferential treatment, gifts or payment of any kind to a child, in order to solicit any form of advantage or sexual favour from a child.
- Not act in a sexually provocative manner or engage in any form of sexual activity with anyone under the age of 18 regardless of perception of age or development, or the age of consent locally.
- Not spend time with children or young people who receive MSI services or participate in any MSI activities outside work hours, unless they live and work in the same community and come together with those children and young people in the context of family, or social and community life. In this situation, MSI representatives will continue to protect their rights to privacy and safety, by treating them with dignity and respect and by not discussing private/confidential information about them with others.
- Not use social media to contact, solicit or befriend a child or young person involved in MSI activities and not place images of those children or young people on personal social media sites.
- Not hold, kiss, cuddle, fondle or touch children in an inappropriate way.
- Refrain from hiring children for domestic or other labour, which is inappropriate given their age or developmental stage, and which interferes with their time available for education and recreational activities or which places them at risk of injury, and which contravenes local labour law.
- Follow relevant child safeguarding and protection local, state and national laws, customs and traditions of countries worked in. In cases where the laws, customs or traditions contravene the UN Convention on the Rights of the Child (CRC), the CRC shall prevail.

### 7.2. Whilst working in a professional capacity MSI People and Partners will:

- Treat all children seeking services sensitively, in a safe and secure environment.
- Act professionally towards children they interact with, whilst at the same time showing genuine care and compassion and respect a child's right to decision making.
- Ensure a chaperone (i.e., a second staff member or government health worker) is present or offered for all intimate examinations and procedures where the provider is of the opposite gender to the client.
- Ensure, whenever possible, that another adult is present when working in proximity to a child or when finding themselves alone with a child in the community or in MSI services.
- Not sleep close to an unsupervised child or children unless absolutely necessary, in which case

MSI representatives must obtain supervisor permission, and ensure that another adult is present if possible (this does not include a representative's own child or children they are acting as a guardian for).

- Not do things of a personal nature that a child can do for themselves (for example, toileting, bathing, dressing).
- Not physically hit or punish a children in any manner.
- Not drink alcohol or use other harmful substance when working with children and never supply children with such substances.
- Ensure children involved in MSI's activities including service delivery, group education or research, participate in these activities voluntarily, are well informed of the process and have provided consent.
- Ensure that research activities involving children align with the protocol approved by MSI's Ethics Review Committee and/or any other relevant local or international Institutional Review Boards who have provided approval.
- Report any suspicion, allegation or witness of child abuse or other breaches of the Child Safeguarding Policy and Code of Conduct by MSI People or Partners via MSI's Speak Channels outlined in Section 5.2.1.
- Follow [MSI's Data Privacy Standards](#) in order to ensure that sensitive data relating to those under the age of 18 is not misused and/or does not expose them to risk of harm through failure to secure sensitive data; this includes information relating to safeguarding cases, which must remain confidential at all times.
- Disclose any child related convictions or investigations that they are subject to outside their role as a representative of MSI.
- Where a child discloses incidents of sexual, gender based violence, act in accordance with [MSI's SGBV guidelines](#).

**7.3. Whilst photographing, or recording children or using images of children at work MSI People and Partners will:**

- Adhere to the guidelines outlined with [MSI's Ethical Story Gathering Toolkit](#).
- Assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
- Obtain informed consent from those under 18 and their guardian before recording, ensuring that they fully understand how the images will be used and possible repercussions. Ensure that all images can be removed or deleted should informed consent be withdrawn at any time.
- Ensure that images and associated information are honest representations of the context and facts and are strictly relevant to the work of MSI.
- Ensure media imagery and stories present children and young adults in a dignified and respectful manner and not in a vulnerable or submissive manner. Individuals should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

## Policy Version Control

Version:	Version 3
Applies to:	All MSI team members
Written by:	Global Policy Engagement Manager
Approved by:	Global Director of Legal, Safeguarding and Donor Compliance
Date:	January 2025
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