



DCA POLICY:  
**CHILD  
SAFEGUARDING**

June 2023

## **0. Policy Title** DanChurchAid's (DCA's) Child Safeguarding Policy

### **1. Definitions**

**Child:** A child or young person is any person under the age of 18 years, regardless of national laws, which may recognise adulthood earlier.

**Child Neglect:** Child neglect means the failure by a parent or caregiver, or by organisations and service providers, to provide a child with the culturally accepted and essential conditions for their physical and emotional development and well-being. In a development or emergency context, the risk of this form of abuse can occur when someone uses his/her position to withhold assistance in order to gain favours or advantage. Neglect can also happen in emergency or development contexts, when lack of time or conflicting priorities can lead to not considering children when planning project activities.

**Child Protection:** Child protection is the set of policies, procedures and practices that the organisation employs to protect children from all forms of mistreatment including, but not limited to, all forms of violence, child labour, commercial and sexual exploitation.

**Child safeguarding:** Child safeguarding is about the responsibility that each organisation has to make sure its staff, operations and programmes do no harm to children. Child safeguarding is the set of internal policies, procedures and practices, which DCA employ to ensure that the organisation is a child safe organisation.

**Child trafficking:** Child trafficking refers to the exploitation of girls and boys, primarily for forced labor and sexual exploitation. Examples include commercial sexual exploitation or for labor, such as domestic servitude, agricultural work, factory work and mining, or they are forced to fight in conflicts.<sup>1</sup>

**Emotional abuse:** Emotional abuse refers to a parent or caregiver's inappropriate verbal or symbolic acts toward a child, or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. It may include a repeated rejection or belittling of a child, or the making of threats, which has the intent to scare and frighten. It can also result from excessive demands that place expectations on a child beyond their capacity, or by witnessing forms of violence, including domestic violence. Psychological violence – also referred to as emotional abuse

---

<sup>1</sup> [The Fight Against Child Trafficking | Save the Children](#)

– is the most widespread type of domestic violence. There is no meaningful difference between emotional and psychological abuse, and hence both terms are used interchangeably.

**Harm:** Harm refers to physical or psychological injury or damage to a child's health, survival, development or dignity.

**Physical abuse:** Physical abuse includes actions that cause harm and injury to a child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning. Other examples may include actions that can cause physical damage such as withholding medication, food or water, or confinement of a child. This form of abuse may be intentional, an indirect consequence of physical punishment or aggression, or may arise from neglect where the child is exposed to physically dangerous and life-threatening situations.

**Sexual abuse:** Sexual abuse occurs if a child is pressured or forced to take part in any kind of sexual activity, whether or not the child is aware of, or consents to, what is happening. It is the use of a child for sexual gratification by an adult or significantly older child or adolescent. This includes activities, which deliberately expose a child to sexual imagery or pornography. Sexual abuse may involve siblings or other family members, or persons outside the family.

**Sexual Exploitation:** Sexual exploitation refers to one or more of the following:

- Committing or coercing another person to commit acts of abuse against a child possessing, controlling, producing, distributing, obtaining or transmitting materials that exploit a child.
- Committing or coercing another person to commit an act of grooming (behaviour that makes it easier for an offender to procure a child for sexual activity), including online grooming.
- Facilitating, encouraging, or knowingly benefiting from child labour - that is, work that children should not be doing because they are too young to work, or because it is dangerous or otherwise unsuitable for them.

**Staff:** Staff refers to all personnel affiliated with the organisation whether full time, part time, interns or volunteers, as well as those employed on short-term contracts in any location.

## **2. Introduction**

DanChurchAid (DCA) has developed this Child Safeguarding Policy to prevent and minimize the risk of harm to children who are involved in DCA supported activities. It complements, but does not

replace, the DCA Staff Code of Conduct and the DCA Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy as well as the International Code of Conduct for the International Red Cross and Red Crescent Movement and Non-Governmental Organisations (NGOs) in Disaster Relief. The policy also builds on and adheres to the Act Alliance Child Safeguarding Policy, May 2015.

The DCA Staff Code of Conduct was updated in 2020 with key contents from this Child Safeguarding Policy. All DCA staff sign the updated version, thus reaffirming their willingness and responsibility to uphold the standards therein, including those related to the safeguarding of children. Upon approving this updated Child Safeguarding Policy, adherence to its content will have prominence in DCA's Staff Code of Conduct.

It is essential that DCA staff receive clear instructions and guidelines on the expectations to their conduct, including space to reflect positively on how to stimulate an open, respectful and non-abusive work culture.

In addition, it is essential that DCA management is equipped with adequate authority, responsibility, monitoring tools and recourse for action in the event of any misconduct. The goal is to maintain and further strengthen an exploitation-free environment.

DCA Child Safeguarding Policy is one of zero tolerance, where DCA does not tolerate any form of abuse, neglect, trafficking and exploitation of all people it works with, including children, perpetrated by DCA staff, volunteers, or by implementing partners. DCA is therefore committed to the prevention, detection and investigation of all forms of abuse, neglect trafficking and exploitation of children in all its offices and among its implementing partners.

### **3. Policy purpose**

The objective of this policy is to promote and to ensure respect for the rights to safety, well-being and development of all children affected by DCA's activities. It aims to prevent and minimize the risk of any kind of abuse of children and to ensure that suspicions and cases of misconduct are identified, reported, and addressed in an appropriate and timely manner. The policy applies to all DCA staff, DCA volunteers and visitors to projects.

DCA holds the position that all forms of violence, abuse, trafficking and exploitation violate children's dignity and rights as human beings. All children have a right to be safe at all times, and are bearers of equal rights to protection from all forms of abuse, neglect, trafficking and exploitation.

DCA's policy is informed by the UN Convention on the Rights of the Child (UNCRC) and its Optional Protocols (on involvement of children in armed conflict and on sale of children, child prostitution, and child pornography).

DCA Country Offices shall implement this Child Safeguarding Policy with due respect to national policies and regulations, as far as these are in accordance with the UNCRC and its Optional Protocols. Any inconsistencies identified in this regard should be discussed with the Country Office or Head Office in Copenhagen.

DCA employees are responsible for following and abiding by the rules and regulations of local and international child protection legislation in countries where they travel and work, as well as international laws and conventions in relation to all forms of child abuse and child exploitation, including but not limited to: child sex tourism, child sex trafficking, child labour and child pornography. Moreover, DCA employees are obliged to follow the Code of Conduct and its related policies, such as the Child Safeguarding Policy and the DCA PSEAH Policy. Employees who are contracted with DCA, sign the DCA Code of Conduct (CoC). This policy adheres to the CoC and thus equally apply to all employees.

It is the responsibility of DCA to inform partner organisations and other relevant stakeholders about this policy.

#### **4. Scope**

This Child Safeguarding Policy applies to all DCA staff, volunteers, consultants, interns, national as well as international staff, and any other individuals representing the organisation, including implementing partners, both during working and off-duty hours.

DCA upholds the following principles in keeping with the above-mentioned international human rights standards for keeping children safe:

- All children have equal rights to protection, survival, well-being and development regardless of the child's or his or her parent's or legal guardian's race, colour, sex, sexual or gender identity, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- The best interests of the child is paramount to child protection activities.
- Children's views are to be heard, valued and respected.
- Special attention is to be given to the girl child due to dominant patriarchal and gender

discriminatory norms in many societies.

- Any form of child abuse, trafficking or exploitation is unacceptable.
- Everyone has a responsibility to support the protection of children.
- Organisations have a duty of care to children with whom they work, are in contact with, or who are affected by their work and operations.
- Where organisations work with partners, they have a responsibility to support partners in meeting minimum protection requirements.

DCA employees, are obligated to follow this policy and any breaches of this policy shall be reported through the DCA complaints system or the whistleblower scheme (specified below).

## **5. Procedures and requirements**

### **5.1 Prevention of Child Abuse**

As stipulated in the UNCRC, all children have the right to protection from all forms of violence, injury or abuse, neglect, and maltreatment, trafficking or exploitation, including sexual abuse and exploitation. While States are the primary duty-bearers in this regard, DCA is dedicated to respecting children's rights, to ensuring that their welfare and physical security are recognized, safeguarded, and protected in accordance with international human rights standards. Child protection is a central and fundamental aspect of DCA's overall accountability towards affected populations and rights holders. The UNCRC and its Optional Protocols remain central in this regard.

As part of its commitment to prevent exploitation and trafficking, DCA might in some instances have to work according to specific donor compliance requirements. An example of this is the Certification Regarding Trafficking in Persons, that DCA signed in 2020, in response to a requirement by the United States Agency for International Development (USAID). DCA has also implemented a compliance plan to prevent the prohibited activities of the Mandatory Provision "Trafficking in Persons" and to monitor, detect, and terminate any contractor, subawardee, employee, or other agent of the applicant/recipient engaging in any of these activities<sup>2</sup>.

---

<sup>2</sup> Activities include but are not limited to: Trafficking in persons (especially Women and Children), Procurement of a commercial sex act, Use of forced labour, etc.

## **5.2 Ensuring Child-Safe Recruitment of Staff**

DCA is committed to robust recruitment practices. The following steps will be taken in the recruitment process:

- Vacancy announcements should mandatorily announce that DCA has zero tolerance on child abuse and sexual exploitation, as per international human rights standards and DCA's Staff Code of Conduct.
- When appropriate to the position, candidates will undergo a reference check for their past behaviour as per this Child Safeguarding Policy and DCA's Staff Code of Conduct. At least two references must answer positively to this.
- Selected candidates for positions that require close contact with children need to undergo a criminal background check. Candidates will be asked for their consent to such a check and will be informed on why this is required. Where a criminal background check is not feasible, other measures will be taken to screen the individual's suitability to work with children. The screening will be documented in personnel files.
- Successful applicants will be provided with a full copy of this Child Safeguarding Policy, and asked to sign the DCA Staff Code of Conduct. This will be kept on their personnel file.

## **5.3 Staff Code of Conduct for Safeguarding Children**

As part of DCA's commitment to respect human rights, all DCA staff, DCA volunteers and visitors to projects should act in the following manner within and outside working hours:

- Treat all children equally and with respect, without discrimination of any kind, irrespective of the child's or his or her parent's or legal guardian's race, colour, sex, sexual or gender identity, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Rigorously restrain from engaging in acts, behaviour or using language that is or can be seen as inappropriate, abusive, assaultive, sexually provocative, demeaning or discriminatory to children, and at all times respect private boundaries in accordance to the situation.
- Under no circumstances develop sexual relationships with children, whether or not it is with the child's consent, or engage in abusive physical or virtual relationships with children.
- Do not inflict physical, emotional, financial or psychological punishment on children.
- In no way encourage or condone behaviour on the part of others, which could be interpreted as abuse or exploitation of children.

- In no way be under the influence of alcohol or drugs while assuming professional responsibility for any child.
- Actively seek to prevent the trafficking of children and the forcible recruitment of children into armed groups or the engagement of children in commercially exploitative activities, and report possible non-compliance in this regard.
- Promote the participation of children, including the girl child, in decisions that affect them and listen to them.
- Actively reduce risk of any allegation by ensuring that another adult is present when working in the proximity of children.
- Maintain confidentiality in child protection cases and disclose information only with the relevant parties, as authorized by DCA.
- Report all concerns regarding policy non-compliance and suspicion of non-compliance to the DCA complaints system.
- Abide by relevant local legislation, including labour laws in relation to child labour, in so far as such legislation accords with international human rights standards, including the UNCRC, and is in the best interest of the child.
- Comply with local traditions or restrictions for reproducing personal images. Never pose children in ways that could be seen as sexually suggestive, vulnerable or submissive
- To the extent possible, obtain verbal permission from the parent/guardian, if taking a picture of a child/children. To the extent possible, explain how the picture will be used.

#### **5.4 Prevention and Awareness Raising**

DCA have a responsibility to ensure that all its employees are aware of the Child Safeguarding Policy, that they understand what it means in concrete behavioural terms and how it applies to their programme context.

DCA will raise awareness and ensure that the safeguarding of children's rights is an integral part of its work. This includes knowledge on human rights protection of the child. DCA made Partner's Staff Code of Conduct a mandatory point in Partners' Cooperation Agreements, whereby in accordance with the Core Humanitarian Standards (CHS), the partner must ensure that an internal Staff Code of Conduct is in place, and reflects as a minimum the values and standards of the Partner regarding Promotion of fundamental human rights, Anti-discrimination practice, Anti-corruption practice, Prevention of sexual abuse and exploitation and Child safeguarding. This started to be documented through the DCA contracts with partners from 2018 onward.

The topic of Child Safeguarding together with consequences of misconduct will be thoroughly



addressed as a mandatory element during the introduction period in DCA (DCA - Code of conduct and Expected Staff Behaviour course is mandatory to be completed by all employees within the first 3 months of employment.).

DCA is developing an additional refresher e-learning course on Prevention of Sexual Exploitation and Abuse (PSEA), that covers Child Safeguarding, where all DCA staff are requested to complete the refresher training on a yearly basis. The aim is to also deliver the content of this course to consultants, contractors, volunteers and implementing partners to provide information and training on DCA's standards of conduct, including on conduct prohibited under this Policy.

All staff have an individual responsibility to familiarise themselves and their dependents with the DCA Policy as well as on the Code of Conduct and its purpose.

*This document automatically forms part of all contracts of employment.*

## **5.5 Monitoring and Evaluation**

Regular monitoring of risks, risk mitigation and the effectiveness of the child safeguarding measures will be incorporated into DCA's monitoring processes. Monitoring visits must include questions on procedures in place to ensure compliance with this policy, both for own staff and relevant partners.

## **5.6 Execution and Division of Responsibilities**

DCA is committed to putting in place a clearly defined management structure to ensure coordinated and consistent implementation and monitoring of this policy throughout the organization.

### **DCA Management**

DCA's senior management, Middle managers, and Country Directors have the overall responsibility for implementing the Child Safeguarding Policy in DCA by proactively ensuring staff awareness of all elements of the policy and abiding by its procedures.

### **The Human Resources Unit (HR) at Head Office and Country Offices**

The HR Unit is responsible for ensuring that each new DCA staff member signs the DCA Code of Conduct, where the Child Safeguarding Policy is listed and that new staff understand the content of the CoC and the need to comply with it, as well as the consequences of any breach of the DCA CoC

and its related policies. (This includes ensuring that the mandatory online training sessions are completed within the first three months of employment).

This Unit will act as a resource unit, offering support and guidance to all DCA employees, as necessary. They will share good practice and lessons learned within DCA.

### **All Staff**

Each person must take responsibility for his/her own conduct, having read and affirmatively confirmed adherence to the DCA policy to safeguard children. Any allegation or concern regarding a breach of this policy should be reported in writing to the complaints system or the the whistleblower scheme for further action.

### **Everyone**

It is incumbent upon all members of DCA staff, Board, and Council to uphold the principles of this policy and to share their knowledge and contribute to the protection of children.

## **5.7 Reporting of Potential Misconduct and Disciplinary Procedures**

When engaging in activities with children, DCA staff are obliged to find appropriate, accessible and safe means for children to report abuse. Special attention must be paid to the fact that children often do not report experiences of abuse themselves. Communities should be made aware of how, where and to whom to report any incidence of abuse by a DCA staff member or any other person associated with DCA. Children should be made aware, in an age-appropriate language, the kind of behaviour they should expect from staff, and how to report any breach of the Code of Conduct by a staff member or any other person associated with DCA. DCA should also work with local partners to develop their understanding of the policy, the Code of Conduct, and work with them to mainstream Child Safeguarding in their own programs.

**Responding to suspected/alleged breaches** Any substantial suspicion of breaches of this DCA Child Safeguarding policy can and should be reported to the DCA complaints system or the whistleblower scheme and will be handled according to procedures and processes for handling sensitive complaints.

All DCA staff act as entry-points to the DCA complaints system and are required to report any knowledge, concerns or substantial suspicions of misconduct to the DCA complaints system or the whistle blower scheme in DCA Head Office immediately and without investigation.

It is the responsibility of all staff to be alert to stories or signs of child abuse within DCA activities, therefore staff must be attentive to activities that could threaten the intention to safeguard children.

In cases of suspicion, hearing rumors or experiencing any doubts related to potential misconduct, staff can seek advice from the HR Unit or from the Accountability and Complaints advisor at DCA Head Office.

## The DCA Complaints system

### **Complaints System- and Whistleblower Scheme**

DCA has zero tolerance regarding the abuse, trafficking and exploitation of children. DCA employees are obligated to follow this policy and report any suspicion, rumors or confirmed breaches of the Child Safeguarding Policy. All incidents of abuse, trafficking and exploitation of children in DCA, partner organisations or other incidents related to DCA activities must be reported.

Whistleblower Scheme – is for reporting of sensitive complaints of all current DCA employees and former employees up till one year after termination of contract. A whistleblower report typically concerns matters of a serious nature, such as criminal offences, corruption, sexual exploitation, breaches of law, or serious violations of DCA’s personnel policies.

Complaints System – is the system that external parties as people supported by DCA, partners, vendors, etc use when reporting sensitive and operational complaints. It is also used is for reporting operational complaints for current and former DCA employees. An operational complaint is typically a complaint about the quality of DCA’s work.

All reports are handled confidentially and all persons reporting to DCA will be protected against retaliation. For more information on DCA’s Complaints System and the reporting channels, please visit [Complaint system - DanChurchAid](#)

## **Non-discrimination or Retaliation**

DCA does not tolerate harassment, acts of retaliation or any other type of penalty against whistleblowers and complainants who submit a report in good faith about a matter within the scope of the whistleblower scheme and Complaints System. If DCA becomes familiar with the identity of the whistleblower (via consent or legal actions) DCA will ensure that whistleblowers are not met with retaliation.

Reports must be submitted in good faith on the correctness of the report. Whistleblowers and complainants who make a report in good faith will not be subject to negative consequences even if the reported concern or suspicion proves to be unfounded. Employees of DCA who in good faith submit whistleblower reports of potential violations, will not risk discrimination or retaliation in the form of employment sanctions. This protection shall apply accordingly even if it is subsequently established that there was in fact no violation.

It is prohibited to deliberately submit false or misleading information via the Whistleblower Scheme and to make deliberate misuse of the Whistleblower Scheme. Reports submitted by DCA employees in bad faith will, depending on the circumstances, result in negative employment law consequences for the person submitting the report and can furthermore constitute a criminal offence.

## **Criminal records and former complaints**

Staff must notify DCA of any criminal convictions or charges of abuse, trafficking and exploitation of children. Staff must also notify DCA of any relevant former complaints made against them concerning suspected or substantiated misconduct related to abuse, trafficking and exploitation of children.

## **Disciplinary measures**

The complaints committee at DCA Head Office will handle the complaint according to DCA's investigation procedures, including decisions on actions and follow-up. Any and all decisions on legal or disciplinary actions will be made by DCA HQ, headed by DCA legal advisor, following a thorough investigation with respect for due process safeguards.

## 6. References, Related Resources, or Appendices

- DCA's Code of Conduct
- DCA's Complaints Handling Guideline
- DCA's Whistleblower Scheme and Complaints System Policy
- DCA's Prevention of Sexual Exploitation, Abuse And Harassment (PSEAH) Policy

## 7. Policy Information

**First approved:** Approved by the DanChurchAid (DCA) governing board, June 20, 2017 **Last revised:** March 2023

**Effective date:** Month June, 2023

**Next review required by:** Month June, 2027

**Policy Manager:** Accountability and Complaints Advisor

**Unit:** Strategy and Quality Management Unit