



Samoa Victim Support Group (SVSG)

CHILD PROTECTION POLICY

**JAN 2010, REVISED JAN 2014,
REVISED APR 2018, REVISED MAY 2019**

TABLE OF CONTENTS

INTRODUCTION TO SVSG	3
COMMITMENT TO THE PROTECTION OF CHILDREN	5
PURPOSE AND SCOPE OF THIS POLICY	6
GUIDING PRINCIPLES	7
CODE OF CONDUCT AND EXPECTED BEHAVIOUR	8
CHILD SAFE RECRUITMENT & HUMAN RESOURCE PRACTICES	11
REPORTING & RESPONSE PROCEDURES	14
INFORMATION, MEDIA AND COMMUNICATIONS	17
VERSION CONTROL	18
ATTACHMENTS:	
Child Protection Code of Conduct	20
Child Protection Reporting Form	22
SVSG Visitors Agreement	23
Child Protection Risk Register	25
GLOSSARY	27

INTRODUCTION TO SVSG

Samoa Victim Support Group Incorporated (SVSG) is a legally registered non-government organisation (NGO) in Apia, Samoa - based behind the Central Police Station.

Vision

SVSG exists to assist victims of crime and the helpless by providing integrated, personalized and professional service to ensure that they are supported to be safe and in control of restoring their lives, through quality services.

Mission

SVSG aims to be recognised as the leading community organisation in Samoa that:

1. provides access to an integrated, personalised and professional service to all survivors of crime and those in need;
2. advocates for the rights and interests of survivors of crimes and those in need;
3. supports those at risk of becoming victims of crime;
4. advocates for violence free families and communities;
5. provides safe and secure shelters for survivors;
6. champions the interests and rights of persons with disabilities;

History

SVSG was founded in 2005, on the dream of a lawyer who identified the difficulties faced by victims who do not have support from family members. With the absence of an organization in Samoa dedicated to providing support and refuge for victims of sexual crimes, it was evident that a gap needed to be filled to address the safety of the vulnerable - in particular young children. In response to the absence, ex-police officers and members of the criminal investigation team of the Attorney General's Office came together to form SVSG, with the purpose to care, to counsel, to support, and to help victims of sexual crimes.

In 2013, SVSG advocated for legislative changes that protect the rights of vulnerable people, and saw the government of Samoa passed landmark legislation (Family Safety Act 2013 and Crimes Act 2013) criminalizing family violence and establishing a Family Court. This has provided focus on children's rights and enables more people to come forward to report abuse and seek resolution. SVSG remains the only organisation to refuge vulnerable children in Samoa, and at any time we have an average of 70 children in our care.

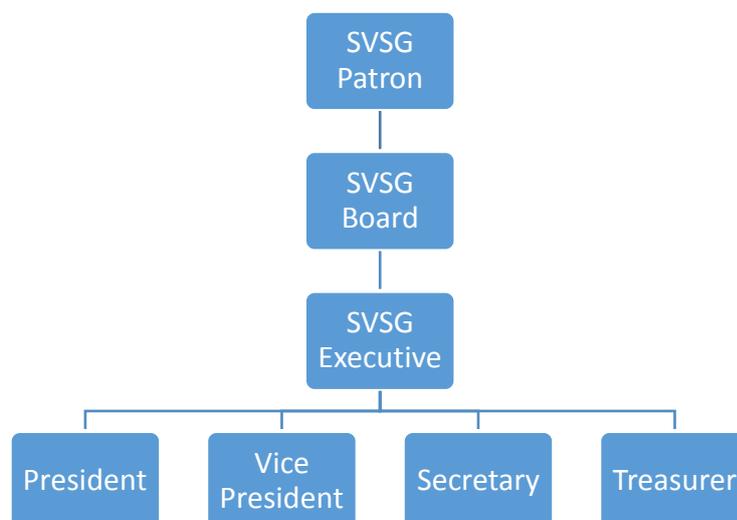
SVSG and its work earned the trust of the community. As such, there is now a local network of over 500 registered village leaders who volunteer as official SVSG village representatives.

Internationally, SVSG has established 6 sub-groups in:

- American Samoa with the SVSG (American Samoa);
- Australia with the SVSG (Queensland), SVSG (Melbourne); and
- New Zealand with the SVSG (Auckland), SVSG (Christchurch).

Structure

Governance



The governance structure of SVSG is headed by the SVSG Patron followed by the SVSG Board. The Executive Committee includes a President, Vice President, Secretary and Treasurer. The Executive meets weekly, while the Board meets every month so decisions and issues can be dealt with promptly.

Paid Staff

SVSG has 13 paid staff working full time under 4 Divisions within SVSG:

Child Protection Division

1. Reintegration Support Officer
2. Psychosocial Support Officer
3. Legal Representation in Court Officer

Shelter Management Division

1. Shelter Coordinator
2. Teachers (2) for the School of Hope (located within the shelter facilities)

Accounts & Administration Division:

1. Financial Controller
2. Accounts & Administration Officer
3. Administration Clerk/Driver

Projects Division

1. Communications & Networking Officer
2. SVSG Village Representative Coordinator
3. SVSG Junior Coordinator
4. SVSG Savaii Officer

Volunteers

Except for the 13 paid staff noted under the Personnel Structure, SVSG rely mostly on the assistance of local and overseas volunteers.

Over the years, SVSG's work has been assisted by volunteers from the United States Peace Corps, the Volunteer Service Abroad New Zealand, the Projects Abroad, the local and other overseas based volunteers.

Services

Initially set up to care, support and help victims of sexual crimes, SVSG saw after the first few cases it handled, that victims of other areas also required assistance. As such, SVSG has been extended to embrace victims in any area of need, whether it be domestic violence, harassment in the work place, victims of poverty etc.

SVSG supports a diverse range of services to provide the best possible assistance to victims of crime and those in need. SVSG operates on a policy of responding to all requests and additional services are created as the needs arise. This is paramount to SVSG's support services, that is, identifying the need and providing the best possible support services to suit that need.

Services provided by SVSG include:

- support and care to empower victims and those in need;
- provision of safe houses and shelters;
- assistance with legal processes;
- counselling and mediation;
- for victims in criminal matters, referrals to police and assistance with Police procedures;
- support for schooling and educational programs;
- welfare services including the provision of basic needs;
- support services for persons with disabilities;
- court support and referral programs (Men, Women and Youth Advocacy);
- community awareness & empowerment programs;
- active networking with the community through SVSG village representatives;
- supporting the SVSG Junior programs;
- promote empowerment programs for child labour;
- collaborative partnership with local stakeholders;
- established support through SVSG sub-groups overseas;
- membership of international bodies.

COMMITMENT TO THE PROTECTION OF CHILDREN

SVSG is committed to promoting and protecting the well-being and safety of children at all times and strongly condemns all forms of violence, abuse and exploitation of children, within or outside of our organisation. All children, regardless of their gender, race, religious beliefs, age, disability, sexual orientation, family or social background, have equal rights to

protection from abuse. Violence, abuse and exploitation of children is neither a norm or associated with traditional Samoan culture or values.

SVSG acknowledges that it has a moral and legal responsibility to protect children within its care. As with all organisations working with vulnerable children, SVSG is cognizant of the fact that there are a number of potential risks associated with delivering its services. SVSG is therefore committed to being a child-safe organisation and minimising the risk of any child being harmed. A child-safe organisation is one that:

- Maintains a caring and protective environment for all children;
- Has an “aware” culture and is proactive in identifying and mitigating child protection risks;
- Does everything possible to prevent intentional and unintentional harm to children;
- Has an open environment where all personnel feel confident and comfortable raising concerns about child protection issues and understand the importance of child protection safeguards;
- Creates an environment children feels safe, can speak out, and are respected and empowered; and
- Ensures that all child protection concerns are brought out into the open and dealt with appropriately.

PURPOSE AND SCOPE OF THIS POLICY

The purpose of this Child Protection Policy is to provide practical guidance on what SVSG will do to protect children from further violence, abuse and exploitation in the delivery of SVSG’s support services by:

- outlining key strategies SVSG will implement to keep children safe and prevent abuse and exploitation (child-to-child, adult-to-child) of children benefiting from SVSG programmes and services;
- providing clear guidance to all personnel on expected standards of behaviour and their responsibilities regarding child protection;
- ensuring all personnel understand what action should be taken if they suspect any child exploitation or abuse within or outside of SVSG;
- demonstrating how SVSG, across all of its operations, will ensure that children are protected from child exploitation and abuse in the delivery of its activities;
- working towards a child-safe organisational culture of promoting and protecting the interests and safety of children; and
- providing assurance that any and all suspected cases of child exploitation or abuse will be reported and fully investigated.

This Child Protection Policy applies to all SVSG ‘personnel’, as well as partner organisations, contractors and sub-contractors.

For the purposes of this Policy, SVSG ‘personnel’ includes SVSG board members, executive committee members, SVSG international sub-group members, paid staff, volunteers, consultants, interns, associates, SVSG village representatives, and SVSG Juniors.

SVSG will ensure partner organisations, contractors and/or subcontractors comply with this Policy. They will also be required to sign SVSG’s Child Protection Code of Conduct.

GUIDING PRINCIPLES

As a child-safe organisation, SVSG’s first priority is the well-being and protection of children. SVSG’s approach to child protection is guided by the following principles:

1. Zero tolerance of child exploitation and abuse

SVSG has zero tolerance to all forms of violence, abuse, neglect and exploitation of children. All personnel are responsible for reporting any suspected or alleged case of child exploitation, child abuse or non-compliance of this Child Protection Policy and/or the Child Protection Code of Conduct. All reports will be handled professionally, confidentially and as quickly as possible. Child exploitation and abuse will attract criminal, civil and disciplinary sanctions.

2. Shared responsibility for child protection

Protecting children from harm and ensuring the well-being and safety of children is the responsibility of all those who participate in SVSG’s work. Children are dependent on adults to care for and protect them, and SVSG personnel working with children are in a special positions of trust and authority towards vulnerable children in their care. Effectively managing risks to children requires commitment, support and cooperation of everyone involved in SVSG programmes, services and activities.

All SVSG personnel and partners must adhere to this Policy and will be held accountable through Employee Contracts, Partner Agreements and Memorandum of Understanding.

3. Assessment and Management of Child Protection Risks

SVSG recognises there are a number of potential child protection risks associated with delivering its services to vulnerable children. While it is not possible to entirely eliminate risks of child exploitation and abuse, SVSG makes a commitment to identify, mitigate, manage and reduce risks to children that may be associated with SVSG programmes, services and activities.

A Child Protection Risk Assessment has been undertaken to identify risks associated with SVSG’s current activities and to outline steps that will be taken to mitigate those risks (see

Attachment C: Risk Register). This Child Protection Risk Register will be regularly reviewed and updated to ensure that it remains current and relevant.

In addition, the Psychosocial Support Officer together with the Communications & Networking Officer are responsible for ensuring a Child Protection Risk Assessment is undertaken prior to the implementation of any new SVSG program.

4. Empowerment and participation of children

As a child-centred organisation, SVSG is committed to promoting children's participation, giving children a voice, and empowering children to protect themselves. SVSG will ensure that all children participating in its programmes and activities know how to protect themselves, know what behaviour to expect from personnel and from each other, know the difference between "good touch" and "bad touch", and know when and to whom to speak out if they feel uncomfortable or at risk.

5. Procedural fairness

SVSG will apply procedural fairness when making decisions that affect a person's rights or interests. SVSG's partners are expected to adhere to this principle when responding to concerns or allegations of child exploitation and abuse.

6. Best interests of the child

SVSG is committed to promoting and protecting the rights of children, and the first priority in everything the organisation does is the well-being and protection of children. In all actions concerning children, the best interests of the child shall be the primary consideration.

CODE OF CONDUCT AND EXPECTED BEHAVIOUR

SVSG expects all personnel and partners to maintain a high standard of personal conduct in all their interactions with children. In both their work and personal life, they will conduct themselves in a manner that respects children's rights, protects children from harm, and reinforces SVSG's reputation as an organisation committed to children's rights.

The standards of conduct SVSG expects of everyone involved in their programmes and activities is set out in the Child Protection Code of Conduct (Attachment A). All personnel, partners, contractors and sub-contractors will be provided a copy of this Policy and must sign a declaration stating that they have read, understand and agree to comply with the Policy and Child Protection Code of Conduct. SVSG will keep a register documenting details of personnel who have signed the Code of Conduct.

The Code of Conduct will be included in relevant information packages to prospective personnel and volunteers and will be prominently displayed in reception areas, staff meeting rooms etc of all SVSG premises.

The Two-Adult Rule

To help protect children from potential abuse and personnel from false accusations, SVSG personnel will avoid situations where they are alone with a child in a private place that cannot be seen by others. Wherever possible, personnel will adhere to the “two-adult” rule, whereby two or more adults are present during any interaction or activities with children.

In counselling situations or other individual discussions where privacy and confidentiality are important, the interaction should take place in a private space, out of hearing but within sight of others (e.g. in a private room but with the door left ajar).

House Rules and Behaviour Management

SVSG will promote a caring environment for children and reduce the risk of abuse between children in its care by having clear house rules, promoting respect between children, and ensuring that all children understand expected standards of behaviour and consequences for unacceptable behaviour. A child-friendly version of house rules will be clearly posted, and will be discussed with children as part of the intake process.

SVSG will implement behaviour management strategies that reduce the potential for abusive or inappropriate behaviour by children engaged in its programmes, services and activities, and will ensure a fair and consistent response to unacceptable behaviour by children. SVSG has zero tolerance for corporal punishment, and children will not be subject to any form of physical punishment (hitting, slapping, smacking) or any other form of degrading or humiliating treatment. All caregivers will be trained in positive parenting and appropriate behaviour management.

Supervision and Child-Safe Sleeping Arrangements

SVSG will also reduce the risk of abuse between children in its care by ensuring that children are supervised at all times by an adult. An appropriate caregiver-to-child ratio will be maintained, having regard to the number, ages and special needs of children in SVSG’s care. Children in SVSG’s care will have round-the clock supervision, and sleeping arrangements will be organised so that children of the opposite gender are not sleeping in the same room. Matrons will regularly patrol sleeping areas during the evening.

Any inappropriate or sexualised behaviour between children in SVSG’s care will be reported immediately to the Psychosocial Officer for appropriate intervention.

Touching and Personal Care

All SVSG personnel must respect children’s bodily autonomy and not touch, kiss, or fondle children in an inappropriate, unwelcome, or culturally insensitive way. Hugging, kissing and tickling should be done in an age-appropriate manner, and only with the child’s permission.

Other than in the context of performing necessary personal care, children must never be touched on their private parts (breast, buttocks or genitals).

A child-friendly version of key elements of the Child Protection Policy and Code of Conduct will be displayed and accessible to children so that they understand the boundaries of acceptable inter-actions between staff and children, and how to get help if they feel uncomfortable with staff behaviour. Shelters and safe houses will also have a “comments box” where children can submit concerns about their care and treatment.

Child-Safe Travel and Outings

SVSG sometimes organises activities or events that require children to travel. SVSG also facilitates the rescue, removal and transportation of child survivors of violence, abuse and exploitation. In order to minimise the risks of harm to children whilst travelling, SVSG will ensure that the following safeguards are in place:

- Any driver entrusted with a child(ren) must have a valid license and must be a competent and safe driver, and the safest mode and route for travel will be used. Travel after dark will be avoided wherever possible;
- Children must be accompanied by an adult and must not be left on their own at any time. Except in emergency situations, the “two adult” rule will be applied and children will not be transported alone by a driver;
- For group outings, there must be a sufficient number of chaperones for the number of children, and the children must be supervised at all times;
- The accompanying adult(s) must have a mobile phone.

If travel involves over-night transit, or children will be attending an event that requires them to be accommodated overnight, a child safety plan must be developed by the Psychosocial Support Officer and approved by the SVSG President. The plan should ensure:

- There are a sufficient number of chaperones/ accompanying adults for the number of children, and they have been briefed on and signed the Child Protection Code of Conduct;
- The two-adult rule is complied with;
- The chosen accommodation is appropriate and safe;
- Appropriate sleeping arrangements have been made to ensure that adults of the opposite gender are not sleeping in the same room as a child, that a child is not sharing a bed with an adult (other than a parent), and that children of the opposite gender are not sleeping in the same room.

Visitors

SVSG will ensure that interactions between children and visitors (including donors, church groups, community members, researchers, and the media) are managed to ensure that children’s privacy and dignity are respected and children are not exposed to harm.

- All visit to SVSG facilities must be approved in advance by the President.
- All visitors must sign and agree to abide by SVSG’s Visitors Agreement (Attachment D) and will be briefed on their obligations during their visit to SVSG premises. This includes maintaining confidentiality during and after their visit to SVSG, and their obligation to act in a professional and respectful manner.
- Visitors must be closely supervised by SVSG staff at all times and must not be left alone with children.
- Visitors are not permitted to give gifts directly to children in SVSG’s care. Any donations of food, clothing, toys, etc. must be made to SVSG management.
- Out of respect for children’s privacy and personal space, visitors to SVSG’s safe houses and shelters will be restricted to communal areas and will not be permitted in children’s bedrooms. No visitors will be allowed in safe houses or shelters after 5p.m.
- Visitors will generally not be permitted to take photos or videos of children in SVSG’s care. SVSG’s President may give authorization for photographing, filming, story writing or interviewing children, but only where the individual agrees to abide by SVSG’s policies on the use of children’s stories and images.

As a child-safe organisation, SVSG is opposed to “orphanage tourism” or “voluntourism.” Whilst tourists who want to visit or volunteer for SVSG may be well-meaning, exposing vulnerable children in SVSG’s care to frequent visitors and short-term volunteers can harm children’s emotional well-being and their sense of safety, privacy and stability. In addition, allowing people who have not been vetted and who do not have the necessary qualifications or training to interact with children is a significant child protection risk. SVSG will therefore not permit tourists or short-term volunteers to visit its safe houses and shelters or be engaged in positions that involve contact with children in its care. Overseas volunteers will only be recruited through respected volunteer placement organisations (AVI, Peace Corp, Volunteer Service Abroad, Projects Abroad etc.), must have appropriate qualifications and experience to work with children, and must undergo thorough vetting and background checks.

CHILD SAFE RECRUITMENT & HUMAN RESOURCE PRACTICES

SVSG is committed to ensuring that all of its personnel are child-safe. Child protection will be incorporated into all personnel training and human resource functions, and SVSG will ensure that personnel understand their obligations to protect children when carrying out their work.

Recruitment

SVSG is committed to only recruiting personnel who are qualified and suitable to work with children and will not engage anyone – directly or indirectly, paid or volunteer - who poses a risk to children.

SVSG will include the following child-safe message on its website and in all job advertisements, recruitment material, publications etc –

‘SVSG is committed to protecting children and their rights and requires all SVSG personnel to comply with SVSG’s Child Protection Policy and Code of Conduct’.

The following safeguards will be added to the standard SVSG recruitment process for any position (paid or volunteer) that involves contact with children:

- All applicants must complete a Pre-employment Application Form and submit a Curriculum Vitae (CV), outlining their experience and qualifications for the position. Foreign citizens must also provide a copy of their passport.
- At least two **verbal** reference checks will be conducted and documented, with questions about the candidate’s general conduct, character and suitability for interacting with children, including suitability for having regular unsupervised contact with children;
- All applicants must submit a police clearance certificate from their country of citizenship and from every country where they have lived for 12 months or longer over the past five years. Applicants will also be required to indicate on the Pre-employment Application Form if they have ever been subject to a family violence or child abuse complaint (whether or not it resulted in a criminal conviction).
- Interview plans that incorporate behavioural-based interview questions will be used for all positions that involve working with children. The behavioural-based questions to be asked during an interview may be taken from the list below:
 - Have you worked or volunteered with children in a similar position before?
 - How have you handled children who did not want to participate in an activity?
 - Do you mind being supervised?
 - What motivates you/why do you want to work with children in this program?
 - Provide me with three examples of how to work safely with children
 - How would you handle children who were not listening to your instructions?
 - How would you create a child safe and friendly space for children?
- At least one member of the interview panel will have undergone training / be familiar with child protection issues and be able to look out for warning signs (such as unexplained gaps in employment history or frequent changes of employment, regular overseas travel to destinations where child sex tourism occurs, or evasion, contradiction and discrepancies in answers given).
- Overseas volunteers for positions that involve contact with children will be recruited through respected volunteer placement organisations (e.g. AVI, Peace Corp, Volunteer Service Abroad), must have appropriate qualifications and experience to work with children, and must have thorough vetting and background checks.
- All new personnel (paid and volunteer) must sign the Child Protection Code of Conduct as a condition of their engagement. A signed copy of the Child Protection Code of Conduct will be kept on file and also provided to the personnel for their records.

Induction and Training of all Personnel

Having a child-safe organization depends on all personnel associated with the organization fully understanding the child protection policy and procedures and knowing how to implement policies and procedures in their everyday work.

SVSG will ensure that the Child Protection Policy and Code of Conduct are widely publicised and fully understood by all partners and personnel through the following measures:

- The Policy will be published on the SVSG websites and profiled in the SVSG newsletter and annual reports.
- Print copies of the Policy and Code of Conduct will be provided to all partners and personnel, and key elements of both will be posted in public areas of the SVSG office and homes;
- All new personnel will be fully briefed on the Child Protection Policy and Code of Conduct by the Psychosocial Support Officer as part of the induction process. This includes being provided with a copy of SVSG's Child Protection Policy;
- All contractors, sub-contractors and partners will be briefed on the Policy and Code of Conduct as part of the contract / MOU development process;
- All personnel will receive annual training on child protection. During training, SVSG will ensure that participants are reminded of their obligations under SVSG's Child Protection Policy and the Child Protection Code of Conduct. Personnel will also be reminded of the Reporting Process and appropriate boundaries when working with or interacting with children.

SVSG will keep a record of who attended child protection training, a copy of the training agendas (including when the training was held, where it was held, who conducted the training, an overview/description of the training and a copy of materials used/distributed during the training).

Probationary Periods, Supervision and Performance Management

SVSG is committed to incorporating child protection into all aspects of staff supervision and performance management, and ensuring ongoing monitoring and assessment of the suitability of its personnel to work with children. All personnel will receive ongoing supervision, monitoring and support to ensure that child protection policies and procedures are understood and being implemented, and that any problems or queries are dealt with as soon as they arise.

All new appointments will be made with a probationary period to ascertain suitability and reliability of the new staff member/volunteer. All volunteers will work under the supervision of a SVSG staff member at all times.

Child protection issues and an assessment of interactions with children will also be incorporated into regular performance evaluations for all staff and volunteers. This will help to assess staff capacity and identify further training needs, and also provides an opportunity for personnel to input suggestions for improvement of SVSG's child protection practices.

All SVSG contracts will contain provisions to warn, suspend, transfer to other duties, or to terminate an employee or volunteer who violates the Child Protection Policy or Code of Conduct. SVSG will also ensure that any concerns about staff/volunteer interactions with children are kept on file and taken into account in decisions about appointments, transfers and promotions.

All personnel are also required to immediately notify their manager if they are investigated for or charged with any offence relating to a child, or involved in any situation which would be likely to have a negative impact on the reputation of SVSG.

Regular Discussion of Child Protection Issues

Creating a child-safe organization also depends on having an open and aware culture where all personnel and children feel confident and comfortable speaking out and implementing child protection safeguards. SVSG will encourage open and honest discussion of child protection issues and provide opportunities for personnel to raise concerns, to ask questions, and to get feedback and advice about how to keep children safe. Discussion of child protection issues will be incorporated into regular staff meetings and staff retreats. Personnel will also be encouraged to reflect on child safeguarding practices by participating in the periodic review of SVSG child protection risk assessment and risk mitigation strategies.

REPORTING & RESPONSE PROCEDURES

SVSG takes all forms of violence, abuse and exploitation of children very seriously. Child abuse in all its forms is a serious offence under Samoan law, threatens the well-being of the child, and undermines SVSG's mission and reputation.

It is mandatory for all personnel to report immediately any suspected or alleged violation of this Policy or Code of Conduct, or any concerns they have for the safety or wellbeing of a child. A person who knowingly fails to report a violation of the Code of Conduct will be subject to disciplinary action.

For all reports made to the SVSG:

- investigations will be handled professionally, confidentially and as quickly as possible;
- the principles of procedural fairness will be observed;
- confidentiality will be maintained, except when a report to police or relevant authorities, including funding partners, is required; and

- the rights and well-being of the child will be the primary consideration, and any investigation will aim to respect the privacy and safety of the child.

Procedures for misconduct by personnel, partners, contractors or sub-contractors

The following procedures will be followed for reports concerning an alleged breach of the Child Protection Policy and/or Code of Conduct, or concern about the actions or behaviour of SVSG personnel, partners, contractors or sub-contractors:

- The incident must be reported **immediately** to the **SVSG President** with a copy to the **SVSG Psychosocial Support Officer**. In the case of concerns about the actions of the SVSG President, reports should be made to a Board member.
- Initial reports may be made verbally or by telephone, to allow for early intervention and prompt investigation. The initial verbal report must be followed with a written report using SVSG's Child Protection Reporting Form (Attachment B) within 24 hours. The Form is also available on SVSG's website <http://www.samoavictimsupport.org>
- The Psychosocial Support Officer is responsible for taking immediate steps to ensure the child is safe, secure and supported. This includes making sure the child understands that the allegation is being taken seriously and that s/he is not at fault, arranging any care or treatment the child might need (e.g. medical care, counselling), and ensuring that the person accused of misconduct does not have any contact with the child until the investigation is complete.
- An investigation will be launched within 48 hours of receiving the report. Investigations will be managed by the SVSG President (or the Board in the case of allegations involving the President) and carried out by the Psychosocial Support Officer in accordance with SVSG's standard disciplinary procedures.
- Depending on the nature of the alleged misconduct, an employee or volunteer may be suspended, transferred to other duties, or banned from any activities that involve contact with children pending the outcome of the investigation.
- Investigations will be handled sensitively and confidentially and completed as quickly as possible, having regard to the best interest of the child. Information relating to ongoing investigations of child protection incidents will only be shared on a 'need-to-know' basis.
- In addition to any internal disciplinary measures, if the alleged conduct involved a criminal offence under Samoan laws, all information will be reported to the Police (in Samoa and overseas) and full cooperation afforded them during the criminal investigation. The relevant Embassy or High Commission will be informed if a foreigner is involved.
- If the investigation concludes that a violation of this Policy or Code of Conduct has occurred, the President will decide on the appropriate disciplinary outcome, which may include:
 - Formal warning
 - Performance management and monitoring
 - Additional training on child protection
 - Transfer to other duties that do not involve contact with children

- Suspension
 - Dismissal
 - Cancellation of contract or MOU (in the case of partners, contractors and sub-contractors)
- At the conclusion of the investigation, the child and/or his or her parents will be informed of the results of the investigation and what corrective action, if any, will be taken.
 - The Psychosocial Support Officer will continue to liaise with child protection authorities and service delivery partners to ensure that every effort is made to assist the child in coping with any physical or emotional trauma he or she may be experiencing, both during and after the investigation. This may include medical treatment, counselling or any other form of assistance deemed necessary and appropriate.
 - The investigation process will be fully documented and a record will be kept of all reports made under this Policy and the outcomes of the investigation. Records will be kept in a secure place to ensure confidentiality of all parties involved. This is the responsibility of the Psychosocial Support Officer and/or the Communications & Networking Officer.

For any DFAT-funded activity, SVSG will immediately report (even if full details are still to be obtained) any suspected or alleged case of child exploitation or abuse, Child Protection Policy non-compliance, including the Code of Conduct to childwelfare@dfat.gov.au SVSG will provide DFAT with an update on the matter and will outline what action has been undertaken by SVSG to date.

Procedure for responding to incidents of child abuse by non-personnel

The following procedures will be followed whenever SVSG personnel become aware of an incident of violence, abuse, or exploitation of a child during the course of their work, perpetrated by a family or community member who is not associated with SVSG. This includes situations where a child engaged in an SVSG activity discloses abuse, where personnel observe abuse of a child in the course of their inter-action with community members, or where a member of the community reports an allegation of child abuse to SVSG personnel.

- SVSG personnel who receive a disclosure of child abuse, observe child abuse or has concerns for the safety or well-being of a child should report immediately to the **Psychosocial Support Officer**. Initial reports may be made verbally or by telephone. The Psychosocial Support Officer will give advice on the most appropriate immediate response, based on the nature of the incident.
- The initial verbal report must be followed with a written report using SVSG's Child Protection Reporting Form (Attachment B). The Form is also available on SVSG's website <http://www.samoavictimsupport.ws>
- A member of the community wishing to make a report can do so by contacting SVSG:
 - Address:** P O Box 2554, Police Central Station, Apia
 - Phone:** 685-25392 or 685-7576601
 - Email:** svsginsamoa@gmail.com

Alternatively, feedback boxes are securely located in the reception areas of each SVSG location if a member of the community would like to make a report anonymously.

- The Psychosocial Support Officer will follow-up on all reports in accordance with SVSG child protection procedures, including involving the police where a criminal offence is alleged, and take appropriate actions to ensure the well-being and protection with the child.
- SVSG will liaise with the child involved and their family, and offer assistance either through SVSG support services or other local support services.

INFORMATION, MEDIA AND COMMUNICATIONS

SVSG will ensure that all depictions of children in its media, communications and promotional material are respectful of children, protect their privacy and dignity, and do no harm. Any use of a child's story or image on the SVSG website, social media, reports or other publications will first be checked to ensure that the following safeguards have been met:

- All communications will portray children in a dignified and respectful manner and not as helpless victims;
- Children must be adequately clothed, in accordance with the context and local customs, and not depicted in a sexually suggestive manner;
- Informed consent from the child and parent/caregiver must be obtained before photographing or filming a child. An explanation of how the photograph or film will be used must be provided;
- The image, personal details, location or other information that might identify a child survivor must not be published in any form. Photos of children must be blurred so that their identity is not revealed;
- SVSG will never publish a story that may put a child or their family at risk - even when identities are changed or obscured; and
- Partner organisations, contractors, sub-contractors and visitors will be prohibited from using any images or stories of children taken in the course of a visit to SVSG facilities or an SVSG-funded activity without the written permission of SVSG.

SVSG will also implement safeguards to prevent harm to children through communications, social media and digital technology:

- When sending images electronically or publishing images in any form, file labels, meta data, and text descriptions will be modified to ensure that no identifying information about a child is revealed. The geotagging functions will be turned off on cameras and mobile phones;
- Personnel must not use their personal social media, messaging service, or web-based forums to share or upload images of children they come into contact with through their

work, or to share stories or personal information about children engaged in SVSG programmes and services;

- Personnel are strictly prohibited from using SVSG or personal computers, mobile phones, video or digital cameras or any other technology for the purpose of exploiting, harassing or grooming children, or to access, possess, create or distribute child pornography.

DATE OF EFFECT

This Policy is effective from 1 July 2019 and will apply to SVSG’s activities and projects initiated after that date.

This Child Protection Policy will be reviewed every three years (or earlier if required) and lessons learnt will be incorporated into subsequent versions. The scheduled review date is 30 June 2022. SVSG will consider the opinions of children and use their opinions to develop and strengthen future versions of this Child Protection Policy.

Following every reportable incident, a review shall be conducted to assess whether SVSG’s Child Protection Policy or other internal procedures require modification to better protect the children under the organisation’s care.

VERSION CONTROL

The following table pertains information regarding the version control of this Child Protection Policy as updated and amended by the SVSG Communications Officer. Any amendments to the Child Protection Policy must be approved by the President of Samoa Victim Support Group and endorsed by the Chair of the Board.

Version	Drafted by	Updated	Details
1	Pepe Tevaga, Projects Officer [with the approval of the President]	January 2010	SVSG Child Protection Policy approved by the Executive Committee
2	Pepe Tevaga, Projects Officer [with the approval of the President]	January 2014	Reviewing of the Policy every three years. Addition to Section 4 with regards to ‘Recognition of the best interest of the child’
3	Pepe Tevaga, Communications & Networking Officer,	April 2018	Updated Policy following review by Australia’s Department of Foreign Affairs and Trade (DFAT)

	with the assistance of Donna Kingelty, Senior Program Officer, DFAT [with the approval of the President]		
4	Shelley Casey, UNICEF Regional Consultant [with the approval of the President]	May 2019	Updated Policy following review by the UNICEF Regional Consultant

RELATED DOCUMENTS

The following documents (available at SVSG’s main office in Apia and at SVSG’s office at Tuasivi Savaii), must be read in conjunction with this Child Protection Policy:

- Employee Office Manual
- Employees Code of Conduct
- Recruitment & Selection Process Manual
- Volunteer Induction Manual

Child Protection Code of Conduct

I, _____ [insert name], acknowledge that I have read and understand SVSG's Child Protection Policy, and agree that:

I will:

- Treat all children with dignity, respect and compassion;
- Treat all children equally and without discrimination, regardless of race, colour, sex, language, disability, religion, national, ethnic or social origin, birth or other status;
- Maintain a safe, inclusive and welcoming environment for children;
- Ensure that, whenever possible, another adult is present when I am working with children;
- Respect children's privacy and maintain confidentiality;
- When unsure of the boundaries of appropriate or inappropriate behaviour towards children, I will seek guidance from the SVSG Child Protection Officer or other senior staff;
- Comply with all national laws relating to the care and protection of children;
- Immediately report concerns about the safety or well-being of a child or breach of this Policy and Code of Conduct; and
- Disclose any investigation, charges, or convictions for an offence that relates to child abuse or exploitation which occurred before my association with SVSG, and immediately advise SVSG if I am investigated for or charged with any offence relating to a child, or involved in any situation which would be likely to have a negative impact on the reputation of SVSG;

And I will not:

- Use inappropriate language – whether of an offensive, demeaning, abusive, threatening or sexual nature – when speaking with or whilst in the presence of a child;
- Physically abuse a child or use any form of physical punishment;
- Engage in behaviour to shame, humiliate, belittle or degrade a child, or otherwise emotionally abuse a child;
- Hold, kiss, or touch a child in an inappropriate, unwelcome, or culturally insensitive way;
- Engage in any form of sexual intercourse or other sexual activity with a child under the age of 18;
- Sexually exploit a child, including paying for sexual services of a child, or facilitating or profiting from child prostitution;

- Sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor’s permission, and ensure that another adult is present if possible (noting that this does not apply to my own children);
- Show preference or favouritism towards a particular child, or provide money or gifts to children I come into contact through my engagement with SVSG;
- Hire a child for domestic or any other labour which is inappropriate for the child’s age or development, which interferes with their time available for education and recreational activities, or is hazardous or harmful to the child’s health, safety or development;
- Disclose the name(s), identifying information or stories of children engaged in SVSG programmes, services and activities without permission from SVSG management;
- Photograph or video a child without prior authorisation from SVSG management and informed consent of child and his/her parents or caregiver;
- Share or place images of children taken in the course of my work through messaging services or personal social media, or otherwise use images of children contrary to the guidelines in SVSG’s Child Protection Policy;
- Use computers, mobile phones, video or digital cameras or any other technology for the purpose of exploiting, harassing or grooming a children;
- Access, possess, create or distribute child pornography through any medium.

I understand that a breach of SVSG’s Child Protection Policy or Child Protection Code of Conduct will be taken very seriously and may be grounds for my employment or position with SVSG to be terminated. I also understand that a breach of the Policy or Code could result in criminal prosecution.

I understand that it is my responsibility, as a person engaged by SVSG, to use common sense and avoid actions or behaviours that are abusive or exploitative of children, or could be construed as such.

I authorise SVSG to undertake necessary inquiries, including criminal record checks (police checks) and reference checks, as part of my appointment or recruitment process. I understand that this information may be passed to SVSG’s funding bodies, including Australia’s Department of Foreign Affairs and Trade (DFAT).

I confirm my willingness to participate in SVSG’s training sessions on child protection.

Name:

Position:

Signed:

Date:

Child Protection Reporting Form

REPORTER'S INFORMATION:

Name: _____ Title: _____ Date: _____

Village or Address: _____ Telephone: _____

VICTIM'S INFORMATION (One report per victim):

Name: _____ Gender: M /F DOB or Age: _____

Village or Address: _____ Telephone: _____

_____ Present Location of Victim _____ School & Class

Yes / No Yes / No _____
Physically Disabled? Mentally Disabled? Other Disability (Specify)

Where was the victim at the time of the incident? (check where appropriate):

Home School Care Other (Specify) _____

INVOLVED PARTIES (If more than 2, list them in a separate sheet and attach):

Name (1): _____ Gender: M /F DOB or Age: _____

Village or Address: _____ Telephone: _____

Relationship to Victim: _____

Name (2): _____ Gender: M /F DOB or Age: _____

Village or Address: _____ Telephone: _____

Relationship to Victim: _____

INCIDENT INFORMATION:

_____ Date/Time of Incident _____ Place of Incident

Narrative Description:

[If necessary, attach extra sheet (s)]

SVSG Visitors Agreement

Thank you for your interest in SVSG and our work. SVSG is committed to safeguarding the well-being of all children involved in our programmes, services and activities. In order to ensure the full protection of vulnerable children in our care, we ask you to read this Agreement carefully.

In order to keep children safe, all visitors to SVSG programmes and facilities are required to comply with the following child protection safeguards:

- Visitors must get prior approval from the SVSG President;
- Visitors must be accompanied by an SVSG staff member at all times;
- Out of respect for the privacy and dignity of children in our care, visitors are restricted to common areas of our safe houses and shelters;
- Visitors are not permitted to have intimate contact with children (kissing, hugging, etc.);
- Visitors wishing to make donations of money or gifts may do so through SVSG management. SVSG does not allow visitors to give money or gifts directly to children in our care;
- No photos or videos may be taken by visitors except with express authorisation by SVSG and with the consent of the child(ren). All phones, cameras and recording devices must be left at the gate;
- All visitors must respect children's privacy and not share verbally or through written or electronic means, any information about cases discussed or overheard during their time in the office or shelters, or any information that might disclose the identity of a child in our care. This includes photographs and other related documents.
- Reporters and researchers wishing to photograph, video or interview children are required to get prior approval from the SVSG President. A full description of the purpose of the interview/photographs, including where the final piece will appear or be published must be provided in writing, before authorization is given. Case stories, photographs, video, etc. must be submitted to the SVSG President for approval before being published;
- If authorisation is given to interview or photograph a child, the children and/or their caregivers must be informed about the purpose of filming, photographing, or story taking, and give consent to this beforehand. A member of the SVSG staff must be present when a child is interviewed. Children must feel in control, and an interview, filming, photographing (etc.) must conclude immediately if the child wishes so;

This Agreement established herein between Samoa Victim Support Group (SVSG) and the Visitor will be effective upon signing this Agreement by the SVSG President and the Visitor. By signing this agreement, you agree to be bound by this Agreement and accept the consequences of legal action that may be taken by SVSG due to any breach of this Agreement.

SVSG is registered as an Incorporated Non-Government Organisation with the Ministry of Commerce, Industry and Labour in Samoa. It is therefore a legal entity, and can sue and be sued in its name – Samoa Victim Support Group.

.....
Lina Chang
SVSG President

.....
Date

.....
Signature of Visitor

.....
Print Name

.....
Date

Child Protection Risk Register

Potential Risk	Details of Risk	Risk Rating	Risk Mitigation	Plan to manage risk
Vulnerable to abuse	A child is released into an environment where they are vulnerable to continued abuse	Moderate	Eliminate	Alternative housing by way of the Campus of Hope
	The life of a baby is in danger of being harmed	Moderate	Eliminate	Alternative housing for the pregnant mother by way of the Ray of Hope Shelter. Mothers are also able to raise their children in the house of blessings.
Privacy breach	A breach in the child's privacy due to public appearances	Moderate	Minimise	Public appearances are very limited and only occur when the president is in attendance. During appearances, support staff are to speak to anyone who has recording devices and announce to the public the need to refrain from recording or taking photos.
	A breach in the child's privacy while at the Campus of Hope.	Moderate	Minimise	All personnel must abide by the SVSG Code of Conduct and guidelines on Information, Media and Communications, including provisions on privacy and confidentiality. All visitors must be approved by the President before entering the Campus of Hope and must sign and agree to abide by the Visitors' Agreement.
Violation of the child's right to be safe	A breach in the protected child's safety and well-being due to inappropriate behaviour exercised by another child within the Campus of Hope.	Moderate	Minimise	Female and male dormitories are to remain separate with the matrons on regular patrol during the evening. A child-friendly version of house rules will be clearly posted, and will be discussed with children as part of the intake process, so that they understand expected standards of behaviour and consequences for unacceptable behaviour. SVSG will implement behaviour management strategies that reduce the potential for abusive or inappropriate behaviour by children. There is a zero tolerance policy for bullying.
	A breach in the child's safety and well-being due to the acts of an adult employed or associated with SVSG	Low	Minimise	Child safe recruitment and HR practices to be followed. All personnel associated with SVSG, including volunteers, are to undergo a police check, sign the Child Protection Code of Conduct upon commencement of their association with SVSG, and receive regular

				<p>training on child safeguarding (refer to Child-Safe Recruitment and HR Practices for more details).</p> <p>Children will be empowered to protect themselves and know how to report abuse. Suggestion boxes will be placed in all shelters and safe houses.</p>
	A breach in the child's safety as unwanted visitors approach the shelter		Minimise	There is to be a security guard at the shelter at all times. Appointments for the children are only accepted at the president's approval.
Emotional and Behavioural Risks	A child exhibits behaviour that causes disruption within the Campus environment i.e. frustration, arousal & distress	Moderate	Minimise	The child will undergo counselling services until the counsellor is satisfied with the child's level of emotional and behavioural advancement. A plan for the child will be made to improve behavioural patterns.
	Presents behaviour that suggests mistrust of adults due to rape or extreme physical abuse.	Moderate	Minimise	Counselling services are available for the child until they are not needed.
Environmental Factors	Lack of routine which damages the child's feeling of security and stability	Moderate	Minimise	A set routine that includes schooling, regular eating times (breakfast, lunch & dinner), chores/responsibility and bed times.

GLOSSARY

All definitions herein are in the context relevant to children:

<p>Abuse</p>	<p>Includes:</p> <p>physical abuse—the use of physical force against a child that results in harm to the child. Physically abusive behaviour includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning</p> <p>neglect—the failure of a parent or adult caregiver to provide a child (where they are in a position to do so), with the conditions that are culturally accepted as being essential for their physical and emotional development and wellbeing.</p> <p>emotional abuse—inappropriate verbal or symbolic acts by a parent or adult caregiver toward a child, that fail to provide a child with adequate non-physical nurture and emotional availability. Such acts have a high probability of damaging a child’s self-esteem or social competence.</p> <p>sexual abuse—engaging in sexual activities with a child who has not reached the legal age of consent, and any sexual act with a child under the age of 18 where use is made of coercion, force or threats, where a person abuses his/her position of trust, authority or influence over the child; or where a person takes advantage of a particularly vulnerable situation of a child, such as mental or physical disability or a situation of dependence. Sexually abusive behaviours can include fondling genitals; masturbation; oral sex; vaginal or anal penetration by a penis, finger or any other object; fondling breasts; voyeurism; exhibitionism; and exposing the child to, or involving the child in, pornography. Under the Crimes Act 2013, sexual violation is the act of a male who rapes a female (unlawful sexual intercourse, defined as penetration of the female’s genitalia by a male penis), or the act of a person having unlawful sexual connection with another person (penetration of the genitalia or anus of any person by any part of the body or any object held or manipulated by any other person; connection between the mouth or tongue or any part of the body of any person and any part of the genitalia, anus or breasts of any other person). The Crimes Act also penalises any sexual conduct with a child under 12 and any sexual conduct with a young person under 16.</p> <p>ill-treatment—disciplining or correcting a child in an unreasonable and seriously inappropriate or improper manner; making excessive and/or degrading demands of a child; hostile use of force towards a child; and/or a pattern of hostile or unreasonable and seriously inappropriate degrading comments or behaviour towards a child.</p>
<p>Behavioural-based interview questions</p>	<p>Interview questions that probe the applicant’s past behaviour in specific situations relevant to the position. Behavioural-based questions give interviewers additional information about the applicant’s suitability to work with children.</p>

Changes in circumstances	<p>Personnel should report the following changes in circumstances to management:</p> <ul style="list-style-type: none"> - involvement in criminal activity - disciplinary procedures and criminal or civil court proceedings relating to child exploitation and abuse.
Child or children	<p>In accordance with the United Nations Convention on the Rights of the Child, ‘child’ means every human being under the age of 18 unless under the law applicable to the child, majority is attained earlier. For the purposes of this policy, SVSG considers a child to be a person under the age of 18 years.</p>
Child exploitation	<p>One or more of the following:</p> <ul style="list-style-type: none"> - committing or coercing another person to commit an act or acts of abuse against a child - possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material - committing or coercing another person to commit an act or acts of grooming or online grooming - using a minor for profit, labour, sexual gratification, or some other personal or financial advantage
Child pornography	<p>In accordance with Samoa’s Crimes Act 2013, ‘child pornography’ means pornographic material that depicts, presents or represents (i) a child engaged in sexually explicit conduct; or (ii) a person appearing to be a child engaged in sexually explicit conduct; or (iii) images representing a child engaged in sexually explicit conduct; and includes any audio, visual or text pornographic material. It is a crime under Samoan law to sell, distribute, exhibit, print, publish or knowingly possess child pornography.</p> <p>Child pornography is sometimes referred to as “child abuse material”.</p>
Child protection	<p>An activity or initiative designed to protect children from any form of harm, particularly that arising from child exploitation and abuse.</p>
Child safeguarding	<p>The broad obligation on personnel and partners to ensure that the design and delivery of SVSG programs and organisational operations do not expose children to adverse impacts, including the risk of abuse and exploitation, and that any concerns about children’s safety within the communities where they work are appropriately reported.</p>
Contact with children	<p>Working on an activity or in a position that involves or may involve contact with children, either under the position description or due to the nature of the work environment (also see Working with children definition)</p>
Contractor	<p>The individuals engaged to perform specific services under a contract. This includes:</p> <ul style="list-style-type: none"> (a) specified personnel nominated in a head agreement with an intermediary company (the contractor) to which payment is made; or

	(b) if the person performing the service is the service provider, he/she is an individual contractor
DFAT	Australia's Department of Foreign Affairs and Trade
Grooming	Generally, refers to behaviour that makes it easier for an offender to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to sexualise that relationship (for example by encouraging romantic feelings, or exposing the child to sexual concepts through pornography). Grooming can take place through in-person contact, or online (see online child solicitation).
Harm	Any detrimental effect on a child's physical, psychological or emotional wellbeing. Harm may be caused by financial, physical or emotional abuse, neglect, and/or sexual abuse or exploitation whether intended or unintended
Informed consent	Ensures the child and the parent or guardian understand the implications, purpose and potential uses of photographs or videos
Online Child Solicitation / Grooming	The act of sending an electronic message to a recipient who is a child (or the sender believes to be a child), with the intention of procuring the child to engage in or submit to sexual activity with another person, including but not necessarily the sender; or of sending an electronic message with indecent content to a recipient who the sender believes to be a child. It is a crime under the Crimes Act 2013 to use information and communication technology to propose to a child to meet him or her, with the intent of committing an offence and where such proposal has been followed by material acts leading to such meeting.
Personnel	Personnel are either employed by an organisation, engaged by an organisation on a subcontract basis, or engaged by an organisation on a voluntary or unpaid basis. For the purposes of the SVSG Child Protection Policy, 'personnel' includes SVSG board members, executive committee members, SVSG international sub-group members, paid staff, volunteers, consultants, interns, associates, SVSG village representatives, and SVSG Juniors.
Police clearance certificate	The certificate showing the results of a criminal record check, which is issued by the police or other authority responsible for conducting such checks
Policy non-compliance	The failure to abide by SVSG's Child Protection Policy, and DFAT's Child Protection Policy if it is a DFAT funded activity
SVSG	Samoa Victim Support Group
Statutory Declaration	A written statement which you sign and declare to be true before an authorised witness
Working with children	Working with children means being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity, and the contact is not incidental to the activity. Working with children includes volunteering or other unpaid works (also see Contact with Children definition).