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# 100 Million Child Protection and Safeguarding Policy 2020

## *Global and national campaigns*

### 1. Purpose and scope of this policy

The purpose of this policy is:

- a. To protect children and vulnerable young people who engage with the 100 Million campaign in any way. This includes, but is not limited to, children and youth activists and volunteers, children and young people who participate in our online and/or offline activities, and the children of those who engage with the campaign.
- b. To provide our campaign representatives – including staff, organisers, National Planning Group partners, and other relevant individuals – guidelines for ensuring the safety and protection of the children and young people with whom we engage.

As the campaign operates through an informal international network, working with volunteers as well as staff and using online and offline tools to bring young people together, this policy is compelled to be comprehensive. On this basis, the scope of this policy is as follows:

- a. To protect children (anyone below the age of 18).
- b. To protect young people (anyone below the age of 26) who are particularly vulnerable due to their personal circumstances, including (but not limited to) experiences of displacement, forced labour, violence, and sexual abuse.
- c. To apply to anyone who operates as a publicly identified representative of the 100 Million campaign, including all paid staff, trustees, volunteers, designated coordinators and organisers of national 100 Million campaigns, and organisers of local 100 Million campaign groups, anywhere in the world.
- d. To be applied to online (including electronic campaigns, social media, online outreach) and offline activities (including meetings, training, conferences, marches, demonstrations).

At the national and global levels, organisational partners to the 100 Million campaign are very likely to have their own child protection and/or safeguarding policies. For staff of these organisations, or for youth organisers who are officially recognised and supported by these organisations, the 100 Million Child Protection and Safeguarding policy is intended to support, not supersede, existing policies.

### 2. Policy Statement

100 Million is a human rights-based campaign, and its vision is for *young people to lead the creation of a free, safe, and educated world within a generation*. With children and young people at the centre of its work, the campaign has a fundamental responsibility and duty of care to ensure their safety and protection.

Every child and young person has the right to safety, and it is the responsibility of everyone acting under the 100 Million campaign banner to ensure this right is delivered when a child or young person is under our care. As we work with and on behalf of the world's most marginalised children, we have an additional duty of care to recognise their particular vulnerabilities when providing protection.

Specifically, this means that anyone under the protection of this policy will be:

- valued, respected, represented, and heard
- protected in any 100 Million online communications, including social media, direct mailings, our websites, and all one-to-one communications
- safe in any face-to-face activity conducted under the 100 Million banner, and in any space that has been created and managed by 100 Million
- comfortable in their understanding of the ways in which 100 Million works to keep them safe and protected should they ever encounter a breach of these standards.

We deliver this in the following ways:

- Appointing and publicising named, trained protection and safeguarding leads in the global secretariat, and for each of our core partners at the national level where available.
- Training relevant staff and/or volunteers on ways to work with children and young people which protect their right to safety.
- In line with the laws of the relevant country, conducting background/criminal checks on prospective and current staff and/or volunteers who will work face-to-face with children and young people.
- Implementing a code of conduct for staff and volunteers working on behalf of 100 Million at any level.
- Maintaining an [online safety policy](#) which is accessible to children and young people, developed using good practice from around the world.
- Creating physical and online spaces which are physically and emotionally safe and accessible for young people to feel able to fully participate. This includes adult-to-child supervision ratios and creating an anti-bullying, anti-discriminatory environment which must be maintained by all those operating on behalf of the 100 Million campaign and all participants.
- Ensuring physical spaces which are used for meetings and events held under the 100 Million banner meet clear health and safety regulations, and preventing the use of any physical space which could place a child at risk.
- Upholding our commitments to child safety by delivering a robust monitoring and accountability procedure, with clear risk assessment, whistleblowing, reporting, and recording mechanisms.
- Making sure all children, their families and other support networks are aware of the ways in which we work to protect them, and the ways in which they can report concerns or breaches.

### 3. Safeguarding Code of Conduct

*All staff, and other identified representatives of the 100 Million campaign are expected to adhere to the following safeguarding code of conduct. The code of conduct must be signed and returned to the 100 Million global secretariat at the commencement of the individual's engagement with the campaign.*

The safety and welfare of all children is paramount, and the 100 Million campaign fights for every child to realise these rights. I therefore commit to:

- Do no harm to any child, young person, or vulnerable person, in the course of their engagement with the 100 Million campaign, be it directly or indirectly, in person or online, through action or omission.
- Ensure no child, young person, or vulnerable person is exposed to risk of harm or abuse in the course of the day to day delivery of the 100 Million campaign. 'Harm' includes, but is not limited to, bullying, harassment, discrimination, victimisation, violence, verbal abuse, physical abuse, emotional abuse, and sexual abuse.
- Deliver the campaign in accordance with health and safety guidelines and avoid behaviour that creates unnecessary risk to themselves or to children or vulnerable persons.
- Deliver the campaign in accordance with communications guidelines to ensure no child or vulnerable young person is misrepresented or exploited, and to avoid placing them or their family at risk.
- Report any concerns I may have about the welfare of a child or vulnerable person participating in the 100 Million campaign to the designated protection and safeguarding lead.
- Report any concerns I may have about the behaviour of any person acting under the 100 Million campaign banner in relation to the safety and welfare of children or vulnerable persons, including both face-to-face and online contexts.
- Never agree to keep a secret with a child or vulnerable young person which could have an impact on their safety and welfare, or the safety and welfare of other children or vulnerable young people.
- Never exploit a child in any capacity, including employing children as domestic help in the home.

100 Million takes a strict approach to breaches of this Code of Conduct. Any breaches will be dealt with in accordance with our disciplinary policy. Where a breach is found to have been committed which also constitutes a breach of national or international law, this will be reported to the relevant authorities.

100 Million campaign staff should also refer to the protections included in the 100 Million [Privacy and Data Protection Policy](#) and [Communications Principles](#). In addition, all campaign staff must adhere to the core policies relating to anti-harassment and bullying, equal opportunities, health and safety and whistleblowing within the KSCF Staff Handbook.

## 4. Mitigating Risk

### 4.1 Recruitment and training

#### Recruitment

- Job or role descriptions for paid staff and volunteers must provide clear information regarding the position or role's responsibilities to meet the requirements of the organisation's child safeguarding policy.
- For any paid job or role which involves working directly with children or vulnerable young people, 100 Million shall conduct criminal background checks as it deems appropriate and as permitted by law. These roles include but are not limited to youth activism coordination, handling of children's data, and youth activist training. All interviews for such roles will include a discussion on child safeguarding, and the candidate's understanding of this. Contract offers for these roles are dependent on suitable references and criminal record checks.

#### Training

- All induction programmes for staff and volunteers must include the safeguarding policy, safeguarding risk assessment procedure, and a requirement to sign the Code of Conduct.
- For global staff managing meetings, events, conferences or training involving children or vulnerable young people, the global safeguarding and protection lead will ensure that a safeguarding risk assessment is conducted.

### 4.2 In face-to-face contexts (meetings, events, conferences, training):

#### All events must be held in public institutions and venues.

- Any meeting, event, conference, or training which includes anyone under the age of 18 or vulnerable persons under the age of 26 must be held in public venues or institutions. Examples include schools, colleges, community centres, cafes, restaurants, government buildings, and libraries.
- Hotels, conference centres or other similar venues for larger events can also be used, but these must be booked by an organisation which is a member of the national 100 Million planning group, or by the global secretariat.
- No activities involving children or vulnerable young people should be held in private homes under any circumstances.

#### Travel to meetings

- Children under the age of 16 must travel with an adult family member, legal guardian or teacher for any activity held under the 100 Million campaign banner.
- Children aged 16-17 must travel with an adult family member, legal guardian, teacher, or at least one other 16-17 year-old if the travel time is longer than 60 minutes for any activity held under the 100 Million campaign banner.
- All children aged below 18 must only travel internationally with a family member, legal guardian, or chaperone as agreed in writing by the family for any activity held under the 100 Million campaign banner.

#### Residential events

- No residential events in the name of the 100 Million campaign should take place for groups of fewer than six youth participants, unless express permission has been given by an adult representative of each relevant national campaign.
- All residential events should have at least two adult representatives of the 100 Million campaign present at all times (see staff to child ratios below).
- Children under the age of 16 must be accompanied by an adult family member, or guardian as agreed in writing by the family, at any point when they are not in the direct care of a staff member or an adult representative of the 100 Million campaign.
- Children under the age of 16 shall be given accommodation which is shared with their family member, or guardian as agreed in writing by the family.
- Children aged 16-17 and any young person aged 18-25 must be given single sex accommodation.
- Any youth activist aged 16-25 can request sole occupancy accommodation.
- Children aged 16-17 must be under the care of a designated chaperone or chaperones for the full duration of the event. This can include 100 Million staff members or adult representatives.
- No residential accommodation for children or vulnerable young people should be provided in private homes under any circumstances.

#### Supervision ratios

- Two or more adults should be present at all times when supervising activities as part of the 100 Million campaign.
- The 100 Million campaign staff to child ratio is two adults for groups of 2-30 children, with an additional staff member for every further 15 children (3 for 45, 4 for 60 and so on). No representative of the 100 Million campaign should participate in one-to-one, private situations with a child.
- If a child wishes to speak to you in private while you are acting as a representative of the campaign, this must be done with at least one other adult present. If this is not possible, but the child appears to be in distress or the child is likely to be in immediate harm, this must be done with the full knowledge of another adult representative of the campaign, and/or in a populated, public space. Privacy and confidentiality are important, so you must explain your actions clearly to the child and ensure they understand that you are undertaking your responsibility for their safety.

## 4.3 Communicating with children

This section applies to the ways in which representatives of the 100 Million campaign communicate to youth activists already within the network, and the ways in which we communicate through 100 Million-branded communications tools (such as official social media pages). It intends to ensure we protect children online from abuse, including grooming, online bullying, and exposure to inappropriate content or contact.

For guidance and regulations on communicating *about* children and the campaign's portrayal of young people, please see the separate 100 Million Communications Protocol.

### For employed staff of the 100 Million campaign:

- In the case of staff with a role to work with youth activists under the age of 18, communications must only be made using work equipment, work contact details (phone number/email), and during working hours only, with the full awareness of your line manager.
  - If a situation arises where communicating with children outside of designated working hours becomes a necessity, written confirmation of this must be provided by your line manager.
- If your role does not explicitly state a responsibility to communicate with this group, you must not engage in any direct communications with children.
  - If a situation arises where communicating with children becomes a necessity, written confirmation of this must be provided by your line manager.

### For other representatives of the 100 Million campaign:

- **COMMUNICATING THROUGH SOCIAL MEDIA GROUPS:** if a young person under the age of 18 has freely joined a 100 Million-branded social media group, the designated communications lead(s) for that group should be clearly identified to the members on the page itself before group messaging is used.
- **PHONE MESSAGING GROUPS:** no youth activist under the age of 18 should be added to a phone messaging group operating under the 100 Million banner unless there is written confirmation that the young person has agreed to participate in such communications (by filling in a contact details form in writing or online, which clearly states the ways in which we will use the data, or by requesting membership of a group directly by text or via an existing member of the group).
- **EMAIL GROUPS/MAILERS:** only an identified communications lead should send group emails or regular mailers (newsletters etc.) to any youth activists under the age of 18. Please refer to the Communications Protocol information for national and local groups for further details.
- **ONE-TO-ONE COMMUNICATIONS:** if a youth activist under the age of 18 must be contacted individually – for example, if they are leading a school group or running a community activity – then the activist must be recorded as the point of contact, and the National Planning Group must be aware of this.

### For all representatives of the 100 Million campaign:

- All communications with children on any platform must relate to the work of the 100 Million campaign and activities conducted in the name of the campaign.
  - Communications on any other subject are deemed to be inappropriate and constitute a breach of this policy.
- Representatives should not use their personal profiles to make or accept friend requests on social network sites with/from anyone under the age of 18.
  - Representatives can create work profiles to do this if necessary, for which the username and password must be shared with the relevant safeguarding and protection lead.
  - The regulations on one-to-one communications for both staff and other representatives must be adhered to.
- For social media platforms whereby members of the public can choose to follow your personal profile without approval, no one-to-one communications must take place via the messaging functions of the site.
- Social media pages, profiles and groups: at least two representatives of a local, national, or global 100 Million campaign group must have access to the relevant 100 Million-branded social media page, profile, or group. For example, the username and password for the 100 Million Chile Facebook page should be shared by at least two representatives from the 100 Million Chile campaign.
- One-to-one communications via campaign-branded social media pages/groups: if a young person under the age of 18 makes contact through the messaging function of a social media site, at least one other representative of the campaign must be made aware of this communication and subsequent dialogue.
- If a child communicates with you online, by phone, or by text on a non-related matter, representatives must not respond, and must notify their line manager.
- If a child communicates with you online, by phone, or by text on a non-related matter but which gives cause for concern for the welfare of the child, you must notify the relevant safeguarding and protection lead (i.e. national or global) before making any response. The relevant safeguarding and protection lead is responsible for determining the response to the child, if any.

## 4.4 Data protection, online and offline

The 100 Million campaign also works to deliver children's rights to safety and privacy online, in whichever country those children are based.

All children's data is managed and stored in the host country for the global 100 Million team and is compliant with the European General Data Protection Regulation (GDPR). At present, the GDPR offers the most recent and most stringent set of standards for protecting children's data internationally, and as such is the standard to which any child's data will be protected, anywhere in the world.

The one exclusion to this is regarding the digital age of consent, which differs from country to country. The 100 Million campaign monitors the digital age of consent around the world and is committed to adhering to these ages based on the stronger law. In practice, this means that if the age of digital consent in Malaysia (for example) is 18, no data will be stored for anyone aged 17 or lower from that country. If, however, the digital age of consent is not set in Peru (for example), this will be set by the 100 Million campaign at 13, based on the GDPR age threshold. Please see the [list of digital ages of consent by country](#) for information on countries which have set or are due to set the digital age of consent.

Due to the speed with which the law is changing on data collection, consent, and privacy all around the world, this area of the policy is likely to be updated frequently.

*This section of the policy should be read in conjunction with the [100 Million Privacy and Data Protection Policy](#).*

### Data collection

- If a 100 Million national campaign wishes to collect data on a 100 Million-branded website or offline data collection form, data must only be stored in the 100 Million global database. No 100 Million-branded website should have a separate data collection mechanism. The national data in the global database is accessible to named communications leads in each national campaign after a data protection and usage agreement has been completed.
- No personal data should be collected for any child below the age of 13, which at present is an international standard for the digital age of consent.
  - Online, this means all 100 Million-branded websites, including national sites, must block any personal data submitted by children below the age of 13.
  - Offline, no data should be collected in writing from individuals younger than 13.
- If children below the age of 13 wish to participate in the activities of the campaign, they must do so with the permission of their legal guardian, **and** through an existing entity – such as a school, scout or guide group, or other group which is directly supported by a legal entity. In addition, confirmation of this must be provided in writing to the relevant national or global team.
- In territories where the digital age of consent is higher, all 100 Million-branded websites must block any personal data submitted by children below this age.
  - Data may be collected offline from children aged from 13 up to the digital age of consent using school or community group sign-up sheets.
  - Data of this nature may only be added to the global database by the global secretariat.
- Please see the 100 Million Privacy Notice for the types of personal data which can be collected.

### Data storage

- In line with GDPR and the 100 Million campaign data protection policy, all data will be held electronically by the global secretariat of the 100 Million campaign.
- Any offline data which is collected must be inputted electronically to the global database within 5 working days of the end of the event at which the data was collected, and all paper copies subsequently destroyed.
- When data is used for electronic communications – for example, circulation of a global monthly email or national update – this must be done through an approved communications tool, such as Mailchimp. This allows data to be sent directly from the database to the communications tool without the need for downloading the data.
- Data can only be downloaded by or with the written permission of the global secretariat, which shall be given on a case by case basis.

## 4.5 Behaviours of representatives of the 100 Million campaign

Staff and other identified representatives of the 100 Million campaign must adhere to the Safeguarding Code of Conduct. In addition, they should never:

- verbally, physically, or sexually assault or abuse children. This includes engaging in sexual activity with anyone under the age of 18 years regardless of the age of majority/consent
- place children at risk of any of the above abuses
- develop relationships with children which could in any way be deemed exploitative or abusive, including employment of children
- develop relationships with family members of children who are in the care of the 100 Million campaign which could in any way be deemed exploitative or abusive, including informal employment and sexual relationships

- behave in a manner which is physically or otherwise inappropriate
- condone or participate in activities or behaviour with children which are unsafe or illegal.

The list above is not exhaustive.

## 5. Reporting, investigating, and accountability

All representatives of the 100 Million campaign have a duty of care to the children and vulnerable young people within its network, whether this be in person or online. Therefore, we all have a duty to report breaches of this policy to the relevant safeguarding and protection lead. **However, if a child is in physical danger or risk of harm, you must contact the relevant authority (emergency services) immediately.**

### If you believe a breach has occurred:

- In urgent, but not emergency, cases, ensure the child is removed from any situation of ongoing harm or abuse, and is appropriately supervised or supported according to this policy.
- Report immediately to your line manager or the relevant safeguarding and protection lead, either face-to-face or by calling them. If you are the safeguarding and protection lead, ensure your line manager or other senior manager is aware of the incident.
- Ensure you create a report within 24 hours of the incident which clearly states:
  - Date, time and location of the incident
  - Type of incident (e.g. verbal abuse, physical abuse, emotional abuse, sexual abuse/harassment)
  - Details of incident
  - Any actions taken to end the abuse and to support the child subsequently
  - Any immediate help or actions that must be undertaken by the 100 Million campaign.

Please see the [template reporting form](#).

### Investigating incidents and reports:

- All suspected breaches of the policy will be investigated by the safeguarding and protection lead, working with other senior managers and legal advisors where necessary, and in line with the appropriate policy.
- Where a breach may have resulted in serious harm to the child or vulnerable person, or may do serious harm, legal advice must be sought by the safeguarding and protection lead as soon as possible.
- Where there is suspicion of breach of the law of the sovereign territory, the safeguarding and protection lead must ensure the investigating organisation notifies the relevant authority.
- Where it is found that there has been a breach of the policy there will be a disciplinary process.

### Organisational accountability:

- All reports of breaches and the progress of any subsequent investigation must be reported appropriately at Board level:
  - for 100 Million staff members, this applies to any report/investigation which is managed or monitored by the global secretariat. Reports to the Board will be submitted through the Global Campaigns Director
  - for 100 Million national teams, it is expected that the lead partner organisation in the National Planning Group will report the incident and investigation to the full membership of the National Planning Group and the 100 Million global secretariat.
  - for 100 Million local groups, all reports of incidents must be made to the National Planning Group or to the global secretariat – they must not be handled internally.

### Global secretariat contacts

- The overall lead for child protection and safeguarding is Owain James, Global Campaigns Director: [owain@100million.org](mailto:owain@100million.org)
- For reporting incidents which have occurred in a youth-led activity please contact Georgia Potton, Head of Activism: [georgia@100million.org](mailto:georgia@100million.org)
- For reporting online incidents or incidents involving data please contact Shaharazad Abuel-Ealeh, Communications and Policy Director: [sherry@100million.org](mailto:sherry@100million.org)