



# PLAN INTERNATIONAL CANADA

## SAFEGUARDING POLICY AND PROCEDURES

<b>Functional Area</b>	Operations – Safeguarding Unit
<b>Business Owner</b>	Chief Operating Officer Chair of the Board of Directors for Board members
<b>Version</b>	1.0 – March 31, 2023
<b>Approvers/ Approval Dates</b>	Chief Executive Officer - March 14, 2023 Governance & Nominating Committee – March 29, 2023 Board of Directors - – March 30, 2023
<b>Effective Date</b>	1.0 - March 31, 2023
<b>Review Date</b>	This Policy and Procedures shall be reviewed every 5 years from November 2022, or more often as required to ensure compliance with the <i>Global Safeguarding Policy</i> , current legislation, and the external NGO environment.
<b>Related Policies</b>	<ul style="list-style-type: none"><li>• <i>Global Safeguarding Policy</i> revised November 2022</li><li>• Plan International, Inc's <i>Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Policy</i><sup>1</sup></li><li>• Plan International Canada's <i>Code of Conduct with Appendix 2 – Whistleblowing Policy and Reporting Procedures</i></li></ul>
<b>Retired Policies</b>	<ul style="list-style-type: none"><li>• Plan International Canada's <i>Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Policy</i> is retired as of the Effective Date of this Policy.</li></ul>

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<sup>1</sup> Approved by the International Board in October 2020 and applicable to Plan International and its country offices, Regional Hubs and Liaison Offices.

# TABLE OF CONTENTS

<b>Scope</b>	<b>3</b>
<b>Application</b>	<b>3</b>
<b>Definitions</b>	<b>3</b>
<b>Purpose</b>	<b>4</b>
<b>Roles and Responsibilities</b>	<b>4</b>
<b>Reporting</b>	<b>7</b>
<b>Enforcement</b>	<b>7</b>
<b>Approval</b>	<b>8</b>
<b>ANNEX 1</b> <i>Plan International Canada Safeguarding and Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Code of Conduct</i>	<b>9</b>
<b>ANNEX 2</b> <i>Guidelines for Implementing Safeguarding in Practice for Third Party Organizations Working with Plan International Canada</i>	<b>13</b>
<b>ANNEX 3</b> <i>Terms of Reference for Plan Canada’s Safeguarding Focal Point, Safeguarding Leads and Safeguarding Committee</i>	<b>16</b>
<b>1. Terms of Reference for Plan Canada’s Safeguarding Focal Point</b>	<b>16</b>
<b>2. Terms of Reference for Plan Canada’s Safeguarding Leads</b>	<b>17</b>
<b>3. Terms of Reference for Plan Canada’s Safeguarding Committee</b>	<b>18</b>
<b>Procedure #1</b> <i>Reporting A Safeguarding or Sexual Harassment, Exploitation and Abuse (Shea) Concern</i>	<b>19</b>
<b>Procedure #2</b> <i>Recruitment and Ongoing Employment/Engagement with Plan Canada</i>	<b>22</b>
<b>Procedure #3</b> <i>Safeguarding and Child Sponsorship</i>	<b>24</b>
<b>Procedure # 4</b> <i>Children and program participants Images and Identifying information</i>	<b>25</b>
<b>Supporting Documents</b>	<b>27</b>
<b>Media Consent Form for Plan International Canada</b>	<b>28</b>

# 1. SCOPE

Plan International Canada Inc. (“**Plan Canada**”) is a member organization of Plan International, Inc. (“**PII**”), a global organization that strives for a just world that advances children’s rights and equality for girls. As a member organization of PII, Plan Canada is subject to Global Policies approved by the Members’ Assembly including the *Global Safeguarding Policy*.

Plan Canada has enacted this *Safeguarding Policy* to set out additional standards and requirements related to safeguarding in Plan Canada’s programs/projects and operations.

# 2. APPLICATION

- 1.** All Plan Canada Associates and Visitors are required to comply with the *Global Safeguarding Policy* and Plan International, Inc’s *Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Policy* when engaging with PII’s offices or its programs/projects outside of Canada.
- 2.** Plan Canada’s Associates and Visitors are required to comply with this *Safeguarding Policy* when engaging with Plan Canada’s offices or its programs/projects in Canada.
- 3.** Allegations of “Workplace Sexual Harassment” and “Workplace Violence” between Plan Canada Employees will continue to be managed in accordance with Plan Canada’s *Workplace Discrimination, Harassment and Violence Prevention Policy and Procedures*.

# 3. DEFINITIONS

When used in this Policy:

“**Associate**” refers to a range of contracted paid and non-paid individuals who have committed to work with or support Plan Canada. This includes Plan Canada’s Employees, Board members, volunteers, students, interns, researchers, donors, consultants and contractors, and employees and/or representatives of partner organizations and local governments (when operating in a partnership agreement with Plan Canada).

“**children**” refers to persons aged under 18.

“**Employee**” refers to a person who has entered into an employment relationship with Plan Canada including full-time and part-time, permanent and temporary employees.

“**Plan Canada program participant**” refers to individuals of any age who are the target of and who will be affected by one or more of Plan Canada programs carried out domestically.

“**Visitor**” refers to a range of persons who are visiting Plan Canada’s offices or the locations where its programs/projects are carried out. A Visitor may be a journalist, media, researcher, visiting sponsor or celebrity.

## 4. PURPOSE

The purpose of this *Safeguarding Policy* is to ensure that all Plan Canada Associates and Visitors:

- (i) are aware of their obligations to comply with the *Global Safeguarding Policy*, *PII's PSHEA Policy* and Plan Canada's *Safeguarding Policy*.
- (ii) understand their responsibility to report any safeguarding or PSHEA concerns.
- (iii) have access to clear guidelines on how to report suspected breaches of this *Safeguarding Policy*.
- (iv) understand their responsibility to uphold the highest level of personal and professional conduct when working in or visiting programming contexts.
- (v) understand the consequences of breaching this *Safeguarding Policy*.

## 5. ROLES AND RESPONSIBILITIES

The roles and responsibilities for the implementation and management of this *Safeguarding Policy and Procedures* are as follows:

1. **All Associates and Visitors** shall:
  1. comply with the *Global Safeguarding Policy* and *Plan International, Inc's PSHEA Policy* when engaging with PII's offices or its programs/projects, and report and respond to safeguarding and PSHEA concerns and breaches/suspected breaches of these Policies in line with the procedures set out therein.
  2. comply with Plan Canada's *Safeguarding Policy* when engaging with Plan Canada's offices or its programs/projects in Canada, and report and respond to safeguarding concerns and breaches/suspected breaches of this *Safeguarding Policy* in line with procedures set out in this Policy.
  3. commit and contribute to an environment where children and program participants feel respected, supported, safe and protected.
  4. never act or behave in a manner that results in violence against a child or program participant or knowingly places a child or program participant at risk of violence.
2. **Plan Canada Employees** shall execute the *Safeguarding Code of Conduct (Annex 1)*.
3. **Associates (other than Employees) and Visitors** shall:
  - (i) execute either the *Safeguarding Code of Conduct (Annex 1)*, or other appropriate guidance developed by the relevant Safeguarding Lead and approved by the Safeguarding Focal Point, on appropriate behaviour towards children and program participants as relevant to their engagement using the *Safeguarding Code of Conduct (Annex 1)* as a guide; **or**
  - (ii) comply with their own Code of Conduct, provided the contracting People Leader and Safeguarding Lead ensures that it complies with, and is consistent with this Policy.

**Note:** Associates and Visitors engaging with PII's offices or its programs/projects may be required to also execute the *PII Safeguarding Code of Conduct (Annex 1 to the Global Safeguarding Policy)*.

4. The **Chair of the Board of Plan Canada** is responsible for:
  - setting the tone at the top by providing a supportive environment that promotes compliance by Board members with this *Safeguarding Policy*;
  - ensuring that all breaches/suspected breaches made pursuant to this *Safeguarding Policy* involving Board members are investigated, documented and retained; and
  - through the services of the Board Secretariat, ensuring that Plan Canada's *Safeguarding Code of Conduct (Annex 1)* is executed and retained prior to the commencement of a new Board member's engagement and on an annual basis thereafter.
  
5. The **Governance and Nominating Committee (GNC)** is responsible for:
  - overseeing, on behalf of the Board, Management's implementation and management of this *Safeguarding Policy*;
  - reviewing and recommending to the Board for its approval, this *Safeguarding Policy* and any revisions thereto;
  - acting as a resource to the Board Chair and the CEO in carrying out their responsibilities as requested; and
  - briefing the Board on a regular basis on compliance to this *Safeguarding Policy*.
  
6. The **Plan Canada Board** is responsible for:
  - reviewing and approving this *Safeguarding Policy* and any revisions thereto, upon recommendation of the CEO and the GNC; and
  - receiving updates from the GNC on the implementation and management of this *Policy*.
  - individual Board members are responsible for complying with this *Safeguarding Policy* when engaging with children and program participants.
  
7. Plan Canada's **Chief Executive Officer (CEO)** is responsible for:
  - approving this *Safeguarding Policy* and any revisions thereto, and recommending its approval to the Board, through the GNC;
  - setting the tone at the top by providing a supportive environment that promotes compliance to this *Safeguarding Policy* by Plan Canada Associates (other than Board members) and Visitors;
  - ensuring the implementation and monitoring of this *Safeguarding Policy* for Associates (other than Board members) and Visitors;
  - ensuring that all breaches/suspected breaches made pursuant to this *Safeguarding Policy* involving Associates (other than Board members) and Visitors are investigated, documented and retained; and
  - ensuring that Plan Canada has procedures in place that are consistent with this *Safeguarding Policy* and the *Global Safeguarding Policy*.
  
8. **Plan Canada's Executive Management Team** is responsible for:
  - in consultation with Plan Canada's Safeguarding Focal Point, appointing Safeguarding Leads for their Business Units;
  - working with Talent & Culture to ensure that Safeguarding Leads within their portfolios have their specific safeguarding responsibilities accurately reflected in their job descriptions and are reviewed and evaluated within the performance management process against clear standards/KPIs; and

- ensuring that this Policy is fully embedded within their areas of responsibility in accordance with the directions provided by the Safeguarding Focal Point.
9. The **Chief Operating Officer (COO)** of Plan Canada is responsible for:
- undertaking a periodic review to assess compliance with this *Safeguarding Policy* and overseeing changes as a result of this review;
  - ensuring that all breaches/suspected breaches reported pursuant to this *Safeguarding Policy* are investigated;
  - ensuring this *Safeguarding Policy* is communicated and accessible to all Plan Canada Associates and Visitors; and
  - ensuring the appointment of a Safeguarding Focal Point and Safeguarding Leads to function in accordance with their respective Terms of Reference.
10. **Plan Canada’s Safeguarding Focal Point** is responsible for carrying out the responsibilities assigned to this role as set out in the *Terms of Reference for Plan Canada’s Safeguarding Focal Point*. (Annex 3 - #1).
11. **Plan Canada’s Safeguarding Leads** are responsible for carrying out the responsibilities assigned to these roles in their departments as set out in the *Terms of Reference for Plan Canada’s Safeguarding Leads*. (Annex 3 - #2).
12. **Plan Canada’s Vice President, Talent & Culture** is responsible for:
- ensuring that all Employees complete and submit a *Safeguarding Code of Conduct* prior to commencement of their employment, and on a regular basis thereafter;
  - retaining the *Safeguarding Code of Conduct* in the Employee’s personnel file;
  - implementing Procedure #1 – Recruitment and Ongoing Employment/Engagement with Plan Canada;
  - supporting Plan Canada’s Safeguarding Focal Point and Safeguarding Leads in training Employees on this *Safeguarding Policy*;
  - supporting Plan Canada’s Safeguarding Focal Point and Safeguarding Leads in investigating breaches/suspected breaches of this *Safeguarding Policy* and determining appropriate disciplinary action; and
  - ensuring that the job specific safeguarding responsibilities for Plan Canada’s Safeguarding Focal Point and Safeguarding Leads are accurately reflected in their job descriptions and reviewed and evaluated within the performance management process against clear standards/KPIs.
13. **People Leaders** are responsible for ensuring that:
- Children and program participants with whom we engage, work with or are in contact are made aware of the provisions of this *Safeguarding Policy* to ensure they have the confidence and ability to report any incidents occurring against children and program participants;
  - Associates are aware of the safeguarding obligations that are applicable to their role or engagement with Plan Canada;
  - they support and develop systems within their business unit which maintain an environment which is safe for and prevents violence against children and program participants;
  - this *Safeguarding Policy* is fully embedded within their areas of responsibility in accordance with the *Global Hub Safeguarding Standards*; and

- all breaches/suspected breaches made pursuant to this *Safeguarding Policy* involving Associates and Visitors within their areas of responsibility are referred for investigation in accordance with Section 6.

14. **Third Party Organizations Working with Plan Canada** in carrying out our programs, projects, processes, events and/or activities involving children and program participants shall comply with the *Guidelines for Implementing Safeguarding in Partner Organizations (Annex 2)*.

## 6. REPORTING

**Reporting:** All Associates and Visitors shall report and respond to safeguarding concerns and breaches/suspected breaches of this *Safeguarding Policy* in line with Plan Canada's *Safeguarding Procedure #1 – Reporting a Safeguarding Concern*.

**Investigations:** All breaches/suspected breaches of this Policy will be investigated by Plan Canada's Safeguarding Focal Point and/or delegated Safeguarding Lead, documented and records retained with support from Talent & Culture where appropriate. Depending upon the breach/suspected breach, a referral may be made to authorities for criminal investigation and/or prosecution.

## 7. ENFORCEMENT

Violations of this *Safeguarding Policy* can have serious implications for Plan Canada's success. Nothing in this *Safeguarding Policy* abrogates Plan Canada's right to take whatever action it deems appropriate in the event of non-compliance.

- In the case of Employees, violations of the *Global Safeguarding Policy, Plan International, Inc's PSHEA Policy* or this *Safeguarding Policy* may result in disciplinary action up to and including termination of employment, with or without notice, based on the severity of the infraction and the totality of the circumstances.
- Violations by Associates (other than Employees) may result in termination, with or without notice, of the Associate's relationship or engagement with Plan Canada.
- Plan Canada may restrict its business relationships with any third-party organization because of its non-compliance with the *Global Safeguarding Policy, Plan International, Inc's PSHEA Policy* or this *Safeguarding Policy*.
- Civil legal action may be brought by Plan Canada against Associates and Visitors for violations of the *Global Safeguarding Policy, Plan International, Inc's PSHEA Policy* or this *Safeguarding Policy*, in its sole discretion, as it deems appropriate.
- Violations of the *Global Safeguarding Policy, Plan International, Inc's PSHEA Policy* or this *Safeguarding Policy* which may violate local laws will be reported to authorities as required by law, or as otherwise deemed appropriate by Plan Canada.

**Whistleblowing:** If a legitimate concern about the suspected abuse of a child or program participant is raised but proves to be unfounded on investigation, no action will be taken against the reporter. However, appropriate sanctions will be applied in cases of false and malicious accusations. See Plan Canada's *Code of Conduct* for more information.



## 8. APPROVAL

1. Approval of this *Safeguarding Policy* and any revisions, other than non-material revisions to remedy inconsistencies or errors, is required by each of Plan Canada's CEO, the GNC and Board.
2. Approval of the Procedures, and any associated revisions, is required by Plan Canada's Safeguarding Focal Point and the COO or other members of the Executive Management Team depending on the focus of the revisions.
3. Notification of substantive changes or modifications to the *Global Safeguarding Policy*, *Plan International, Inc's PSHEA Policy* or this *Safeguarding Policy* shall be communicated to all Associates and Visitors.



## ANNEX 1

### Plan International Canada Safeguarding and Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Code of Conduct

**[Note: this Code of Conduct must be signed by all Employees.]**

Plan Canada is committed to creating a safe environment for children and program participants. All Employees have a duty to uphold the principles of the *Global Safeguarding Policy*, *Plan International, Inc's Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Policy* and *Plan Canada's Safeguarding Policy* (collectively, the "**Safeguarding and PSHEA Policies**") and commit to maintaining an environment that prevents violence, both at work and outside of work. As such, sexual harassment, exploitation and abuse of children and program participants constitutes acts of gross misconduct and may be grounds for termination of employment.

**As such, I agree that I will:**

- a. Adhere to these *Safeguarding and PSHEA Policies* and be open and honest in my dealings with children, program participants, their families, and communities participating in programs, projects, processes, events, and activities.
- b. Treat children and program participants in a manner which is respectful of their rights, integrity and dignity and considers their best interests regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, or any history of conflict with the law.
- c. Create and maintain an environment which prevents violence, abuse and exploitation of children and program participants ensuring that I am aware of potential risks relating to my conduct and work, and that I take appropriate action to minimize risks to children and program participants.
- d. Contribute to building an environment where children and program participants are:
  - (i) respected and empowered to participate in and discuss decision making and interventions into their safeguarding in accordance with their age, maturity and evolving capacities; and
  - (ii) well informed on their safeguarding and protections rights and what to do if they have a concern.
- e. Display high standards of professional behaviour at all times, providing a positive role model for children and young people.
- f. Comply with all relevant international standards and local legislation in relation to child labour, and refrain from using children (those aged below 18 years) for domestic or other labour, if such work is inappropriate, exploitative, or harmful given their age or developmental capacity, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury, exploitation, or violence. In addition, I understand that I must not use a program participant of any age for domestic or other labour.

- g. Respect the privacy and confidentiality of children and program participants associated with Plan International/Plan Canada. **This means I will:**
- i. Never ask for or accept personal contact details or invitations to share personal contact details (this includes email, phone numbers, social media contacts, address, webcam, skype, etc.) from any child, program participant or family associated or formerly associated with our work or share my own personal contact details with such individuals except where this has been explicitly authorised by Plan Canada and/or for Plan Canada business purposes.
  - ii. Never disclose, or support the disclosure of, information that identifies children, program participants, sponsored families or sponsor children, through any medium, unless that disclosure is in accordance with standard Plan Canada policies and procedures and/or has the explicit consent of Plan Canada. Media include paper, photographs, and social media.
  - iii. Never make any contact with a child, program participant, or family members associated with Plan International/Plan Canada work that is not supervised by a (or another) Plan International/Plan Canada Employee. Such contact may include but is not limited to visits and any form of communication via social media, emails, and letters.
- iv. Always ensure that when on an official or work visit in my role with Plan International/Plan Canada, and I wish to take pictures of children and program participants associated with Plan International/Plan Canada, I will:
- o Always consult first with the local Plan International/ Plan Canada office to make sure that it is okay to take pictures in the local context and that the intended use of the pictures does not conflict with Plan International/ Plan Canada's policies.
  - o Ask permission of the child or program participant (or in the case of young children, their parent or guardian) informing them of the specific purpose(s) and intended use of the image(s) (including how and where the image will be used) and respect their decision to say no making it clear that there will be absolutely no negative repercussions from denying such consent.
  - o Ensure the images are respectful and do not impact negatively on their dignity and privacy.
  - o Ensure that the use of the images does not put the child or program participant at risk of being identified or located.
  - o Never upload images of children associated with Plan International/ Plan Canada or images of program participants to non-Plan International/ Plan Canada social media pages without the explicit consent of Plan International/ Plan Canada, as the case may be.
- h. Report and respond to any concerns, suspicions, incidents, or allegations of actual or potential abuse to a child or program participant in accordance with applicable procedures of the engaging office.
- i. Cooperate fully and confidentially in any Plan International/ Plan Canada investigation of concerns or allegations of abuse to children and program participants.
- j. Immediately disclose all charges, convictions, and other outcomes of an offence, which occurred before or occurs during association with Plan Canada that relate to exploitation and abuse of a child or young person.

**I agree that I will not:**

- a. Abuse or exploit a child or program participant or behave in any way that places a child or program participant at risk of harm, including through harmful traditional practices such as, for example, Female Genital Mutilation, forced or child marriage.
- b. Fondle, hold, kiss, hug or touch children or program participants in an inappropriate way or a manner that is contrary to cultural or social safeguarding norms.
- c. Engage in any form of sexual activity or develop physical/sexual relationships with any person under the age of 18 regardless of the age of consent locally. Mistaken belief in the age of a child is not a defence.
- d. Engage in sexual relationships with Plan International/ Plan Canada program participants regardless of their age involved in our programming as these undermine the credibility and integrity of our work and are based on inherently unequal power dynamics.
- e. Engage program participants in any form of sexual activity which involves the exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of assistance that is due to program participants.
- f. Use language or behave towards a child or program participant in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate.
- g. Have a child or program participant with whom I am in contact in a work-related context, stay overnight at my home or any other personal residential location or accommodation.
- h. Sleep in the same room or bed as a child or program participant with whom I am in contact in a work-related context. Where it is necessary to sleep close to unaccompanied children and program participants, I will make sure that another adult is present, and it is in line with authorized procedures.
- i. Do things of a personal nature for children or program participants with whom I am in contact in a work-related context, (e.g., taking a child to the toilet/bathroom; helping them get un/dressed etc.) that they can do for themselves.
- j. Spend time alone away from others with children or program participants with whom I am in contact in a work-related context; I will always make sure that another adult is with me and/or I am with the child or program participant in an open public place, where others are around and in plain view of others.
- k. Hit or otherwise physically assault or physically abuse a child or program participant.
- l. Use physical punishment/discipline or use physical force of any kind towards children and program participants.
- m. Act in ways that shame, humiliate, belittle, or degrade children and/or program participants, or otherwise perpetrate any form of emotional abuse.
- n. In the course of my work, discriminate against, show differential or preferential treatment to, or favour particular child(ren) and program participant(s) to the detriment of them or others.
- o. Develop relationships with, engage in any practice with or develop behaviour towards children and program participants which could in any way be deemed or interpreted as exploitive or abusive.
- p. Condone or participate in behaviour of children or program participants which is illegal, unsafe, or abusive.

- q. Use any computers, mobile phones, video and digital cameras, or any such medium to exploit, harass or bully children or program participants.
- r. Access, view, create, download, or distribute child sexual abuse material (commonly referred to as “child pornography”) via computers, mobile phones, or video/digital cameras, other electronic devices, or any other media, be it personal property or property owned by Plan International or Plan Canada.

**The above is not an exhaustive list. Employees, Associates and Visitors should consider all related actions and behaviour which may compromise the rights and safeguarding of children and program participants.**

### **Personal Conduct Outside of Work or Engagement with Plan Canada**

Plan Canada does not dictate the belief and value systems by which our Employees and Associates conduct their personal lives. However, actions taken outside of working hours that are seen to contradict our *Safeguarding and PSHEA Policies* or bring our organization into disrepute in relation to our Safeguarding standards may be considered a violation of our *Safeguarding and PSHEA Policies*. Our Employees and Associates are required to adhere to the principles in our *Safeguarding and PSHEA Policies* both at work and outside work.

## ANNEX 2

### Guidelines for Implementing Safeguarding in Practice for Third Party Organizations Working with Plan International Canada

**Scope:** These Guidelines outline the requirements for Safeguarding and Preventing Sexual Harassment, Exploitation and Abuse (**PSHEA**) of children and program participants that are applicable to organizations that work with Plan International Canada Inc. ("**Plan Canada**").

These Guidelines are particularly applicable to organizations assessed as: (i) having contact with/working with children and program participants; (ii) organizations with access to the Personal Information of children and program participants; and/or (iii) whose projects, programs, activities, advocacy and influence work impact children and program participants served by Plan Canada.

These Guidelines illustrate our commitment to support and respect children's and program participants' rights to be protected from harm, and to provide a safe and protective environment for children and program participants who are involved with any programs funded by Plan Canada.

**The Guidelines should be applied in relation to children and program participants as appropriate, depending on the services provided by the organization and the risks to children and program participants.**

1. **Prevention:** Organizations must take appropriate measures to manage child and/or program participant safeguarding and PSHEA risk factors and prevent abuse and exploitation before it occurs. Prevention measures include: (i) organizational safeguarding and PSHEA policies, codes of conduct and associated procedures; (ii) the management of safeguarding risks in relation to its operations, activities, and interventions; and (iii) the production and promotion of "child and program participant friendly" safeguarding and PSHEA information and resources.
2. **Code of Conduct:** Organizations are required to ensure that their personnel avoid any behaviour or conduct that compromises the safety and protection of children and/or program participants within its activities, operations and programs. In addition, programs and activities working directly with children and/or program participants should develop guidance on expected and acceptable behaviour for children and/or program participants towards each other. This should be incorporated into policy and practice documents.
3. **Gender Equality and Non-Discrimination:** Organizations should ensure that their Safeguarding and PSHEA policies and procedures take into account gender equality and non-discrimination requirements, adopting an intersectional approach which recognizes that individuals of different gender identities may face different risks relating to their safety and protection and that all children and program participants have an equal right to protection, irrespective of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, or class.
4. **Screening Procedures:** Organizations should implement detailed screening procedures for all personnel (including unpaid volunteers) who will come into contact with children and/or program participants (directly or indirectly) and/or will have access to their Personal

Information. Screening procedures should be updated on a regular basis. Screening procedures may include: a certificate of good conduct, police reference checks or equivalent, verification that applicants are not listed in national registries of child offenders; a detailed application and interview process; references who support the applicant's suitability to work with children and/or program participants.

5. **Awareness**: Organizations should ensure that all personnel, sub-contractors or consultants or affiliates involved with programs are aware of safeguarding and PSHEA risks, policies and procedures and their safeguarding and PSHEA responsibilities. In addition, children and/or program participants and their parents, guardians or caregivers should be informed of the same so that they know what behaviours to expect and how to report any concerns.
6. **Capacity Sharing**: Organizations should develop and share the capacity of all who work with and for children and/or program participants to appropriately prevent, detect, report and respond to safeguarding and PSHEA concerns, particularly as they pertain to differing genders and other identities. Efforts should be made to ensure organizational policies and practices are understood and can be effectively implemented through mandatory inductions and on-going training courses for all staff and volunteers and other associates.
7. **Participation of children and/or program participants**: Children and/or program participants should be actively, meaningfully and ethically involved in the development of safeguarding and PSHEA measures, in accordance with their evolving capacities. Efforts should be made to ensure organizational policies and practices are understood and can be effectively implemented through mandatory inductions and on-going training courses for all personnel, volunteers, and other associates.
8. **Reporting Mechanisms for children and/or program participants**: Mechanisms should be established that enable the safe reporting of safeguarding and SHEA concerns. Such mechanisms should ensure appropriate escalation of concerns within the organization, referral to the appropriate authorities and confidentiality. In addition, child and program participants reporting mechanisms should be accessible, friendly and sensitive to their differing needs. It is important that complaint mechanisms are established with the participation and input of different groups of children and program participants, as well as communities, so they work for all users as necessary.
9. **Response and Follow Up**: Organizational policies and procedures should include appropriate measures to support and protect children and/or program participants when concerns arise. All measures taken to respond to a safeguarding or PSHEA concern should take into account the best interest of the child or program participant and be sensitive to their differing gender and other identities ensuring they are kept safe and protected. Response measures should be appropriately risk assessed and endeavour to ensure no further harm comes to the child/program participant as a result of any actions taken by the organization.  
  
Concerns should be written up and information kept in accordance with the privacy and confidentiality policies of the organization and/or local legislation. In addition, organizational processes should ensure response evaluation and follow up for organizational learning.
10. **Notification**: Organizations shall immediately advise Plan Canada in writing of any complaints of abuse or exploitation of children and/or program participants involving their personnel providing services to Plan Canada.

11. **Implementation, Monitoring and Review:** The implementation and monitoring of the Organization's Safeguarding/PSHEA Policies should be reviewed at regular intervals as determined necessary by the organization, preferably at least every 3 years. Organizations shall provide Plan Canada with a copy of its *Safeguarding/PSHEA Policies* for review and comment upon request.
12. **Sanction and Discipline of Organization Personnel:** The Organization's policies and procedures should provide for appropriate sanctions and disciplinary measures which ensures that children and program participants are protected from further harm. This may include the immediate suspension of personnel until such time as the allegations are investigated and either substantiated or refuted, and/or where personnel is convicted of abusing a child or program participant, such personnel is immediately terminated from their position.
13. **Informed Consent:** Organizations should provide children (and their parent(s)/legal guardian(s) where applicable) and program participants, with all necessary details (including any associated risk) to make an informed decision regarding their participation in programs and activities, including any voice recordings, video or photographs of children and/or program participants (including how and where these will be used). Participation and/or usage of information and/or images should only take place after consent is obtained. Where directed by Plan Canada, the Organization shall use Plan Canada's *Media Consent Form*.
14. **Protection of Personal Information:** Personal Information regarding any child and/program participant, whether or not such information is obtained as part of the program/projects, should be treated confidentially. There should be clear procedures showing the responsibilities within the Organization for accessing and using such data with appropriate authorizations. In addition, such data should not be disclosed to any third party, except in accordance with the Organization's agreement with Plan Canada or as required by applicable local laws. Personal information includes, but is not limited to, any information that can be linked to or used to identify a child and/ program participant.
15. **Working with partners:** Organizations should ensure adequate safeguarding and PSHEA assessments are made as part of its due diligence processes when it comes to engaging third parties. Third parties that are contracted or supported to work with children and program participants must be subject to the same safeguarding and PSHEA principles and approach outlined in the Organization's policy and procedures. Vendors, suppliers and other contractors that may be in direct or indirect contact with children and program participants must also be subject to appropriate safeguarding and PSHEA measures



## ANNEX 3

### Terms of Reference for Plan Canada's Safeguarding Focal Point, Safeguarding Leads and Safeguarding Committee

#### 1. TERMS OF REFERENCE FOR PLAN CANADA'S SAFEGUARDING FOCAL POINT

##### Responsibilities

Plan Canada's Safeguarding Focal Point shall be responsible, working with the Safeguarding Leads, to:

1. Undertake clear and strong advocacy on safeguarding and Preventing Sexual Harassment, Exploitation and Abuse (**PSHEA**) matters across Plan Canada to raise awareness and increase commitment to its *Safeguarding Policy* among its Employees, Associates and Visitors.
2. Provide high quality, timely and accessible advice, support and guidance to People Leaders and Employees to ensure that adequate Safeguarding measures are integrated into Plan Canada's operations, processes and programs in accordance with the *Global Hub Safeguarding Standards*, as adapted to the Plan Canada context.
3. Collaborate with and provide advice to key Business Units within Plan Canada to ensure that its risk identification and management strategies related to its processes and activities include assessment of safeguarding and PSHEA risks and appropriate mitigating actions are developed.
4. Ensure the delivery of safeguarding and PSHEA training, and refresher training as necessary, to Employees and Associates to ensure they are aware of what our *Safeguarding Policy* means for them and how to execute their specific responsibilities under the *Safeguarding Policy*.
5. Ensure the delivery of specialized safeguarding and PSHEA training, and refresher training as necessary, to support Safeguarding Leads, as needed to enable them to carry out their responsibilities under the *Safeguarding Policy*.
6. Coordinate the implementation of the *Global Hub Safeguarding Standards* at Plan Canada, to ensure that Safeguarding Leads and People Leaders are aware of which Standards apply to their area of responsibility.
7. Coordinate the annual *Global Hub Safeguarding Standards Self-Assessment*, providing reports on outcomes to the Executive Management Team.
8. Undertake and/or support the development of Plan Canada safeguarding and PSHEA procedures in line with global guidance.
9. Provide a central point for the recording of information on safeguarding and PSHEA implementation activities taking place across Plan Canada and sharing information and good practice to global safeguarding counterparts.
10. Working with the Safeguarding Leads, receive reports on safeguarding and SHEA allegations and respond effectively in line with local procedures, acting as the Plan Canada referral point.

11. Working with the Safeguarding Lead, Programs, ensure that reporting on safeguarding and PSHEA matters is provided in accordance with grantor requirements.
12. Provide support and advice in dealing with alleged cases of safeguarding and SHEA concerns by Plan Employees, Associates and Visitors including initiating, assisting with, or managing any necessary investigations in line with appropriate policies and procedures
13. Provide 24-7 contact for urgent Safeguarding issues.
14. Chair the monthly Safeguarding Committee meetings.
15. Provide annual updates to the Board, through the GNC, on the status of the Plan Canada Safeguarding Program.
16. At the request of the Plan International Global Director of Safeguarding and PSHEA, serve on and support the National Organization and Global Hub Safeguarding and PSHEA Top Level Group.

## **2. TERMS OF REFERENCE FOR PLAN CANADA'S SAFEGUARDING LEADS**

Plan Canada's Safeguarding Leads support the Safeguarding Focal Point in the delivery of their responsibilities as delegated. Specific responsibilities include:

1. Working collaboratively with the Safeguarding Committee members, assist the Safeguarding Focal Point in coordinating the mainstreaming of Safeguarding into their Business Unit's core processes, procedures and programming as outlined in the *Global Hub Safeguarding Implementation Standards*.
2. Serving as their Business Unit's representative on Plan Canada's Safeguarding Committee.
3. Coordinating the completion of the annual *Global Hub Safeguarding Standards Self-Assessment* as it impacts on their Business Unit and providing reports on outcomes to the Safeguarding Focal Point and their People Leaders, as required.
4. Challenging poor safeguarding and PSHEA practice and supporting and promoting good practice within their Business Unit.
5. Providing Safeguarding and PSHEA training, and refresher training as required to Employees and Associates in their Business Unit and related programming.
6. Serving as a subject matter expert on Plan Canada's *Safeguarding Policy* and all policies, procedures and practices that give effect to this Policy.

### **3. TERMS OF REFERENCE FOR PLAN CANADA'S SAFEGUARDING COMMITTEE**

#### **Purpose of the Safeguarding Committee:**

Plan Canada's Safeguarding Committee is comprised of the Safeguarding Focal Point and Safeguarding Leads from across Plan Canada who meet to discuss, and address issues related to safeguarding for children and program participants and the responsibilities of employees, associates, volunteers, third parties and others. The Safeguarding Committee is not meant to replace each Business Unit's responsibility to uphold the Safeguarding Policies set in place.

#### **Scope of the Safeguarding Committee:**

##### ***In-scope:***

- Approve changes/updates of Safeguarding policies, toolkits, guides, protocols and processes.
- Report and review reporting to the Global Hub and the Plan Canada Board of Directors.
- Ensure alignment of Safeguarding policies, toolkits, guides, protocols and processes with Global Hub approved standards.
- Provide guidance on Safeguarding training for Employees and Associates.
- Share knowledge and resources to uphold the highest standard of safeguarding and PSHEA.
- Enhance and streamline processes mandated by the Global Hub applicable to Plan Canada.

##### ***Out-of-scope:***

- Assume responsibility for each Business Unit's responsibility to uphold Plan Canada's Safeguarding policies.

**Chair:** The Safeguarding Committee shall be chaired by the Safeguarding Focal Point or delegate.

**Meetings:** The Safeguarding Committee shall meet on a regular basis, typically 10 times annually.

**[See the list and contact details of Plan Canada's Safeguarding Focal Point and Safeguarding Leads on the PlanCONNECT Safeguarding page.](#)**

## PROCEDURE #1

### Reporting A Safeguarding or Sexual Harassment, Exploitation and Abuse (Shea) Concern

#### Your Responsibilities

An effective reporting procedure strengthens the efforts towards a child and program participant safe organization. Abusers are less likely to remain in an environment where people are trained to report inappropriate behaviour.

If you have witnessed violence, suspect violence is occurring, know any information about the violence of a child or program participant, have concerns involving significant harm or violence to a child or program participant or violation of the principles of the *Global Safeguarding Policy*, Plan International, Inc's *Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Policy* or Plan Canada's *Safeguarding Policy* (collectively, the "**Safeguarding and PSHEA Policies**") it is your responsibility to report this to someone. **This is a mandatory requirement for all Plan Canada Employees and failure to do so may result in disciplinary and/or other action being taken.**

#### **ACT!**

Act on your concerns. If in doubt, SPEAK OUT!

Child and Program Participant-Centered. The protection of children and program participants is the most important consideration.

Time counts. Ensure timely, effective, confidential and appropriate responses to child and youth protection issues.

#### Scope of Reporting Obligations

**Note:** Safeguarding concerns or breaches of the *Global Safeguarding Policy* or *Plan International, Inc's Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Policy* must be reported in accordance with the provisions in these Policies.

**Note:** Allegations of "Workplace Sexual Harassment" and "Workplace Violence" between Plan Canada Employees will continue to be managed in accordance with Plan Canada's *Workplace Discrimination, Harassment and Violence Prevention Policy and Procedures*.

Reporting requirements under this Safeguarding Policy can be summarized as follows:

1. Where the **alleged perpetrator is a Plan Canada Employee, Associate or Visitor**, **all** safeguarding and sexual harassment, abuse and exploitation (SHEA), concerns and breaches of Plan Canada's *Safeguarding Policy* must be reported.
2. Where the **alleged perpetrator is not a Plan Canada Employee, Associate or Visitor** **only safeguarding concerns** relating to sexual harassment, abuse and exploitation (SHEA), concerns which suggest a crime has been committed as per local legislation, and other serious forms of violence which are reported to Plan Canada staff, must be reported.
3. All types of abuse regardless of who the perpetrator is, where reporting is required under provincial or territorial law in Canada. For example, when suspected child abuse has occurred within the province of Ontario, the *Child, Youth and Family Services Act* mandates that the suspicion be immediately reported to the Children's Aid Society. It is the responsibility of the Children's Aid Society to investigate, with police if

necessary, and decide on the best plan for the child. Please contact your Safeguarding Lead or Safeguarding Focal Point to discuss the provincial and territorial reporting obligations in Canada.

**If you are not sure whether to report, speak to your Safeguarding Focal Point or Safeguarding Lead.**

### **How to Report**

All safeguarding concerns raised will be treated seriously and with sensitivity and confidentiality. Plan Canada's *Whistleblowing Policy and Procedures* (see [Appendix 2](#) to *Plan Canada's Code of Conduct*) ensures no action will be taken against a reporter who raises a concern in good faith, even if an investigation finds the concern to be unsubstantiated. However, any Associate who makes intentionally false or malicious accusations will face disciplinary and/or legal action.

All safeguarding concerns or complaints related to violence against a child or program participant engaging with a Plan Canada Employee, Associate or Visitor should be reported to Plan Canada's Safeguarding Focal Point or Safeguarding Lead regardless of where the suspected violence has occurred. Where the report relates to suspected child abuse occurring in Canada, it must also be reported to the local Child Welfare Organization according to local legislation. The Safeguarding Focal Point/Safeguarding Lead can guide you on making these reports.

The Safeguarding Focal Point can be reached after regular business hours to report a safeguarding concern or complain at the following # 1-437-828-9055.

Plan International's work with children and program participants primarily takes place in other countries and, as such, safeguarding concerns will likely involve individuals outside of Canada. Plan Canada's Safeguarding Focal Point / Safeguarding Lead for Programs will coordinate with the various Plan International offices and departments to ensure that the matter is thoroughly investigated. This will include working with the Global Hub, legal and in-country management as required.

When a concern is raised to the Safeguarding Focal Point, you will be asked for information to be included in a formal report. An incident report shall be prepared within 24 hours of the complaint and an internal investigation will begin immediately. Immediate action needs to be taken, if necessary, to protect the child(ren) and the safety of the victim/reporter/witness is paramount.

If an allegation of violence is made against an Associate, the individual may be suspended from any work-related task that involves contact with children or program participants while the internal assessment is being completed.

An Associate who is found to have violated Plan Canada's *Safeguarding Policy* will be subject to appropriate disciplinary action up to and including termination of employment or engagement and/or criminal prosecution.

Investigation files are kept in a secure location and are protected with the security measures that safeguard confidential files require.

**Safecall:** As a supplement to these regular reporting channels, for example, when the Safeguarding Focal Point or Safeguarding Lead is unavailable, safeguarding concerns can also be reported from anywhere in the world to *Safecall*, an independent reporting service, which provides a professional, independent and confidential means of reporting your concerns.

The contact information for Safecall is:

Telephone: 1-877-599-8073  
Online: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)  
Email: [plan@safecall.co.uk](mailto:plan@safecall.co.uk)

**If you have a concern, do not worry whether the concern is something that should be reported under the**

**Plan Canada Safeguarding Policy or the Global Safeguarding Policy or PII's PSHEA Policy. Simply make a report to your Safeguarding Focal Point or Safeguarding Lead.** They will then take further action, including advising you regarding your obligations to report to local Child Welfare Agencies or the police where applicable, to ensure that the issue is addressed, and appropriate referrals are made in line with local procedures.

**Act without delay.** Slow reaction to or not reporting a Safeguarding or SHEA concern may mean that the child or program participant suffers additional violence. It may also result in more victims of violence.

**Maintain Confidentiality.** In following the Global Safeguarding Policy, PII's PSHEA Policy and Plan Canada's *Safeguarding Policy*, it is essential that all parties maintain confidentiality. You should share information purely on a 'need to know' basis.

### **Anonymous Reporting**

Where a Plan Canada Employee or Associate receives information regarding related to violence against a child or program participant anonymously, it should be treated as seriously as if "named" and be handled and reported in the same manner.

While Employees/Associates are expected to make named reports, where this is not an option for any reason (for example, there is a genuine fear of reprisal) an anonymous report could be made through the *Whistleblowing Policy*.

### **Peer to Peer Child Abuse**

In some cases, you may be concerned about the behaviour of a child towards another child or the alleged perpetrator may be a child. Grounds for concern will exist in cases where there is an age difference and/or difference in power, status or intellect between the children involved. It is important that such cases are not ignored but reported in the same manner using these guidelines.

However, it must be remembered that the alleged perpetrator is still a child and therefore such cases should be responded to with particular sensitivity. Processes and responses in relation to such cases should consider the protection and safety needs of the child victim and the alleged abuser.

### **Historical Allegations of Abuse**

In some cases, abuse may not be reported right away but some time, or even years, after the event. When such a case comes to light or is reported, it must still be taken seriously and raised through the reporting process described in this document regardless of the length of time since the alleged event.

**Impact on the Reporter:** Your People Leader or Talent & Culture can help you to deal with distress or safety concerns arising from a safeguarding incident.

## PROCEDURE #2

### Recruitment and Ongoing Employment/Engagement with Plan Canada

#### Recruitment

Organizations working with children, youth and other vulnerable persons must be vigilant in its recruitment and selection of employees and volunteers. Plan Canada's recruitment processes include detailed screening procedures to deter and prevent potential abusers from entering the organization. To that end, some of the methods employed are as follows:

- The Position Description indicates that compliance with Plan Canada's *Safeguarding Policy* is a mandatory requirement of all Plan Canada employees/volunteers. The following statement shall be included in the job posting: "Consistent with Plan International Canada's *Safeguarding Policy*, the successful candidate must receive clearance by a police background check, including a vulnerable sector screen."
- At the outset of the interview process, the applicant is informed that satisfactory clearance through a police records check (including vulnerable sector check) is a condition of employment/volunteering.
- The interview and reference checking process will investigate and clarify any employment gaps, ambiguity regarding motivation for wanting to join Plan Canada, or any concerns related to Safeguarding or our PSHEA requirements.
- If the applicant's country of residence is not Canada, or if they have lived for significant periods of their adult life outside of Canada, a police records check is also required in those countries where it is possible and permitted by law. If it is not possible to complete a police record check from a foreign country, the individual will be required to complete a Self-Declaration for Police Records Check form.
- Plan Canada may, at any time, perform a police records check (including vulnerable sector check) on a current employee/volunteer as a condition of ongoing employment/engagement with Plan Canada.
- Results of the police records check should be sent to the Vice President, Talent & Culture for review. Based on the results of the police records check, Plan Canada may terminate employment/engagement or decline to interview/hire. Where an applicant declines to undergo a police records check, or declines to share the results with us, Plan Canada will terminate or decline to interview/hire.
- If anything appears on the police records check, the Vice President, Talent & Culture will confer with the Chief Operating Officer and Safeguarding Focal Point to determine the appropriate course of action. Any criminal conviction for an offence related to children (including sexual abuse, child abuse, sexual harassment, assault, and sexual exploitation), or fraud may be grounds for termination or refusal to hire/engage. Other criminal convictions or local police reports will be treated on a case-by-case basis, with consideration given to the nature of the offence and the amount of time that has passed since it occurred.



- Where available, police background/criminal records checks for positions that involve direct contact with children/youth, are positions of trust and/or have access to child/youth data should be conducted on a regular basis (e.g. on a 3 year cycle).
- All police records check results for employees and volunteers are managed through Talent & Culture. Only the Vice President, Talent & Culture, authorized delegates, the Safeguarding Focal Point, Chief Operating Officer and the President & CEO have access to these reports. Records are stored in the same manner as personnel files and are protected with the same security measures that protect personnel files.

**Screening Procedures:** Screening procedures should be updated on a regular basis. In addition to police reference checks or equivalent, screening procedures may include: certificates of good conduct, verification that applicants are not listed in registries of child offenders; a detailed application and interview process; and references who support the applicant's suitability to work with children and program participants.

**Restrictions:** It is recognized that the police records check may take several weeks to be completed, and, in certain cases, it is desired that employment/engagement begin before the results of the check are known. In these cases, satisfactory clearance of the police records check will form part of the probationary conditions in the offer of employment/terms of engagement. Until the results of the check are known, the employee/volunteer is not permitted to travel to the field or to work with children and/or program participants in Canada.

**Safeguarding Training:** Plan Canada provides Safeguarding/PSHEA and Privacy information and training to all new employees/volunteers engaged by Plan Canada. Upon starting their employment/engagement with Plan Canada, each employee/volunteer is provided with a copy of Plan Canada's *Safeguarding Policy* and is required to sign Plan Canada *Safeguarding Code of Conduct Acknowledgement*.

Safeguarding training must occur within 6 months of the individual's start date and include an orientation to safeguarding issues and the individual's responsibility with respect to safeguarding and PSHEA. Training records shall be maintained in accordance with Plan Canada's Records Retention Policy.

**Restrictions:** Employees/volunteers are not permitted to travel to the field or to work with children or program participants in Canada until they have received the required safeguarding training and signed the *Safeguarding Code of Conduct Acknowledgement*.

## PROCEDURE #3

### Safeguarding and Child Sponsorship

- Sponsorship is a wonderful opportunity to share our work through the eyes of a particular child and their family, and strong friendships often develop. However, it is important that participating in sponsorship does not put a child or other vulnerable person at risk.
- All sponsors, on initial contact, receive in their Welcome Package an explanation of our *Safeguarding Policy* and are directed to our website for more information.
- Plan Canada reserves the right to decline a new sponsorship or end an existing sponsorship and, in making this decision, we will err on the side of caution in the best interests of the sponsored child. In exercising this caution, Plan Canada has determined that it will not accept individuals who are known to be inmates or former inmates in penal institutions as sponsors.
- Employees are trained to look for indications that a donor may pose a threat to a child's well-being, whether at the sign-up stage or at any point throughout the sponsorship.
- All communications (verbal, written or visual including photos) from donors to sponsored children are screened to intercept inappropriate material. Written or visual communications are reviewed by individuals who are specially trained for this task. Any conversation or item that raises a concern is brought forwarded to the Plan Canada Safeguarding Focal Point, who decides whether there is a need to contact the donor or take other necessary action. No questionable letter or picture will be sent to a sponsored child without first reviewing it with the Safeguarding Focal Point. If a phone call with the donor does not satisfy the concern, the matter is then handled according to our Reporting Procedures. Where the donor writes in the child's local language that cannot be screened by someone at Plan Canada, this is clearly marked, and the Country Office is asked to check the content.
- When children leave the sponsorship program, some donors naturally are keen to stay in touch. This will be facilitated, on a case-by-case basis, only after the review and approval of Plan Canada's Safeguarding Focal Point (or delegate). The Safeguarding Focal Point must ensure that the child and their parents/guardians have given their express consent and that the Safeguarding Focal Point in the child's home country has approved the request.
- Where a safeguarding or SHEA allegation or concern is made against a sponsor, the sponsorship shall be suspended pending the completion of the investigation.
- Plan Canada requires that a donor undergo a police check to participate in sponsor visits.

## PROCEDURE #4

### Children and program participants Images and Identifying information

#### 1. Children and program participants Images and Personal Information

**Respect for rights and dignity:** Plan Canada Associates must be mindful that, as a Child and Youth centred organization, we have a duty to use children and program participant images responsibly and respectfully – and this duty extends beyond straightforward issues of safeguarding and SHEA.

#### **Identifying information:**

1. Personal or physical information that could be used to identify the location of a child or program participant should not be used on a website, in marketing materials or in any other form of promotional communication.
2. The child or program participant's last name should never be used, and their community name should be used only with great caution. The need for transparency must be balanced against the need to ensure that an individual child or program participant cannot be located based on the identifying information we provide. Information provided to sponsors is the one exception to Rule #2. It is acceptable to share the sponsored child's last name and community name with the sponsored child's sponsor, as it was for that reason and with that understanding that the information was provided. However, it is not appropriate to use them in their entirety in a promotional manner as they may contain information that makes it possible for the child to be identified and/or located.
3. Special care must be taken with presentations of vulnerable children (e.g. orphans, homeless Children/Youth, Children/Youth with disabilities, or Children/Youth living in war zones and emergency situations) or vulnerable program participants. If photos or footage of these children or program participants are to be used, they must not be identified by their vulnerable status. If their life stories are to be used for promotional or media purposes, no information can be provided that would make it possible for the child or program participant to be identified or located.

**Images:** Photographs and images of children and program participants should be decent and respectful, and they should not be presented as victims. Images should not depict children and program participants in a vulnerable or submissive manner. Children and program participants should be fully clothed in images taken of them, and not in poses that could be interpreted as sexually suggestive.

Plan Canada's images of children and program participants should be used only with relevant and appropriate context to the work that we do.

**Language:** Plan Canada's communication materials should not use language that disempowers, embarrasses or is disrespectful to a child or program participant. Consistent with international brand guidelines, all language should be positive, engaging and real. Language that implies a relationship of power should be avoided.

**Consent and Permission:** Children and program participants who are involved in interviews, photography or filming organized by Plan Canada and/or the child's parents or guardians must provide written consent by signing Plan Canada *Media Consent Form* (Interviews/Photography/Filming).

Care should be taken to ensure that photographs or footage are used for the purpose for which consent was given. Special care should be taken with the presentation of images on the Internet as it is a vast, unregulated space from which images may be taken and used in other contexts.

## **2. Donor or Third Party Use of Child Images and Personal Information**

- Donors, the media and other third parties occasionally wish to use images of or personal information on children and program participants in Plan Canada program areas.
- Any individual or organization requesting use of Plan Canada's resources such as photographs or videos are required to sign *The Guidelines and Acknowledgement Form for Use of Child Images and/or Child Information* with Plan Canada to ensure their understanding and agreement as to the proper use of such materials. It is the responsibility of the individual coordinating with the donor or third party to ensure that this is done.
- Donors wishing to talk about their sponsorship are advised to avoid giving specific information that could make it possible for a child or program participant to be identified and/or located. The child or program participant's last name and community name must never be used. This applies regardless of what medium is being used (social media, print, etc.).
- Donors who want to share information about their sponsorship through a medium such as social media, print, etc., are required to sign *The Guidelines and Acknowledgement Form for Use of Child Images and/or Child Information* with Plan Canada to ensure their understanding and agreement as to the proper use of this information.
- Donor Care Agents are responsible for advising donors of these protocols whenever the context arises. In addition, donors visiting Plan countries are required to sign the *Guidelines and Acknowledgement Form for Use of Child Images and/or Child Information* as part of the *Visit Policy*.
- When images are sent electronically, they must be protected with a password.

## **SUPPORTING DOCUMENTS**

***Global Safeguarding Policy FAQs***

***Plan International – Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) FAQs***

## MEDIA CONSENT FORM FOR PLAN INTERNATIONAL CANADA

**PLAN INTERNATIONAL CANADA, INC.** (“**Plan Canada**”) is an independent development and humanitarian organization that advances children’s rights and equality for girls. Plan Canada is part of Plan International Worldwide. References to Plan Canada in this Media Consent Form shall include Plan International, Inc.

**[Insert Title of Event.]**

Participants at this event may have their photo taken, be filmed or interviewed. We ask that all participants (and their parent/guardian if the participant is under the age of majority in their province/territory)<sup>2</sup> review this Media Consent Form which details how any photography, videos or interviews will be used. This Consent Form should be signed by the participant and their parent/guardian as applicable.

**Event:** **[Insert description]**

**Date of contributions:** **[Insert description]**

**To be completed by the youth participant:**

- 1) I agree to participate in the interviews / filming / photography in connection with the Event.
- 2) I agree that some or all of the information, interview statements, images, video footage or other contributions (the “**Contributions**”) I make/appear in may be used for any of the following purposes:
  - to publicize and promote Plan Canada’s work;
  - in connection with Plan Canada’s advocacy, educational or media work;
  - in connection with Plan Canada’s research and/or monitoring and evaluation work;
  - in connection with Plan Canada’s sponsorship and/or programming work;
  - to help raise money including sponsorships for Plan Canada; and/or
  - by a donor to publicize its relationship with Plan Canada and/or its support for a program, pursuant to a written agreement with Plan Canada.
- 3) I hereby grant Plan Canada, its representatives, agents and employees, the unrestricted rights and permission to copyright, use, reuse, publish, and/or republish my Contributions in all forms of media including: television, print or radio; electronic media, including social media and the internet, brochures, annual reports, press releases, promotional videos or other communication tools.
- 4) I agree that my Contributions may be used by Plan Canada. I understand that Plan Canada may share my Contributions with parties outside of Plan Canada, including, for example, members of Plan International Worldwide, companies that provide services to Plan Canada, media organizations and corporate donors to Plan Canada.
- 5) I understand that if my Contributions are uploaded to social media or other websites, then Plan Canada has no control over the copying or distribution of such material by other internet users.
- 6) I understand that I will not receive any money or other benefit now or in the future as a result of giving my consent to use of my Contributions.
- 7) I understand that Plan Canada will store and be able to use my Contributions in the ways described above for a period of time that it considers appropriate, after which Plan Canada will move the material into its image archive.
- 8) I understand that I can withdraw my consent for Plan Canada for future use and/or republication of my Contributions by contacting youth@plancanada.ca. I understand that it is not possible to withdraw images, videos, case studies or television or radio content where it is already published.

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<sup>2</sup> The age of majority is **18** in 6 provinces: Alberta, Manitoba, Ontario, Prince Edward Island, Quebec, and Saskatchewan and 19 in 4 provinces and the 3 territories: British Columbia, New Brunswick, Newfoundland, Northwest Territories, Nova Scotia, Nunavut, and Yukon.

- 9) I understand that I do not own copyright or have any rights of ownership or other claim over the written copy, photographs or films that Plan Canada produces. I hereby release from liability and discharge Plan Canada and all persons acting under its authority from any claims related thereto.
- 10) I understand that I can still participate in Plan Canada programs or projects even if I do not sign this Consent Form.

I hereby affirm that I am over the age of majority and have the right to contract in my own name (if you are under the age of majority please have your parent/guardian sign additional consent below). I have read the above consent form and I fully understand its contents, meaning, and impact, and I acknowledge that I have had the opportunity to review this consent form with a legal representative. I understand that my consent below shall be binding upon me and my heirs, legal representatives and assigns.

Signature of Participant: \_\_\_\_\_

Witnessed By: \_\_\_\_\_ Date: \_\_\_\_\_

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**If participant/subject is under the age of majority:**

I hereby certify that I, \_\_\_\_\_ (insert name), am the Parent/Guardian of \_\_\_\_\_ (insert youth participant's name) and do hereby give my consent without reservation to the foregoing on their behalf.

Parent/Guardian's Name & Signature: \_\_\_\_\_

Witnessed By: \_\_\_\_\_ Date: \_\_\_\_\_