



## COCD Safeguarding Children Protocol

### **Purpose**

These procedures are mandatory for Cross Over Community Development (COCD) Representatives (including employees, volunteers, interns, and Trustees), Partners (Sublessees, partners, vendors, suppliers, consultants, and others with whom we provide assets in exchange for services or products), and Program Visitors.

### **Procedures**

#	Procedure/Action	Owner
Procedure 1: Roles and Responsibilities for the Implementation of the Safeguarding Policy		
1	All COCD Representatives have a responsibility to understand and adhere to the Safeguarding and Counter-Trafficking Policy (the “Policy”), as well as the Behavior and Conduct Guidelines and applicable procedures. They are responsible for ensuring that safeguarding prevention measures are incorporated in their respective work and immediately report (within 24 hours) any safeguarding concerns. Representatives are required to participate in safeguarding investigations when their participation is requested.	All
2	Senior leadership will be responsible for the following: <ul style="list-style-type: none"><li>Identifying and addressing Safeguarding risks within their areas of responsibility and addressing them.</li><li>Reporting any safeguarding concerns that are disclosed to them within 24 hours.</li></ul>	Executive Director Education Director
3	Senior Leadership roles are trained and supported to deliver a ‘first line of defense’ in the application of safeguarding principles, empowered to make informed decisions on Safeguarding within their teams, increasing Safeguarding awareness and engagement within their teams, sharing advice and updates, and raising concerns of Safeguarding Policy violations to the Senior Leadership.	Executive Director Education Director
Procedure 2 – Awareness/Dissemination of Policy		

1	The website developer will ensure that the reporting methods are accessible on the COCD public website.	Executive Director Website Developer
2	All Representatives will sign an acknowledgement of receipt and understanding of the Safeguarding Policy within 45 days of hire. A record of this acknowledgement will be kept by People & Culture.	All personnel, including sublessees and partners
3	Directors will develop and disseminate age and developmentally appropriate materials to Program Participants to support their understanding of the Policy and steps for reporting safeguarding concerns. Where appropriate and feasible, visual materials should be posted in program sites outlining expected behavior from staff and reporting channels.	Education Director
4	Directors will develop, maintain, and adhere to procedures that specify how children and families will be informed of safeguarding expectations and reporting procedures, including: <ul style="list-style-type: none"> <li>• How verbal reviews will be provided to children and adults in a manner that is culturally sensitive, context appropriate, and takes into account other factors such as language, ability, children's ages and developmental levels.</li> <li>• A timeframe for the initial verbal review, and a schedule and method for regularly reviewing such content with children on an ongoing basis.</li> </ul>	Education Director

#### Procedure 3: Recruitment and Vetting

1	All job postings will emphasize an expectation for the applicant, if hired, to fulfill responsibilities to keep children and adults safe within the organizational environment.	Hiring Managers
2	In addition to the requirements for background checks of Representatives detailed in the Background Check Policy, Human Resources will carry out the following additional activities pursuant to SCUS' participation in the Misconduct Disclosure Scheme: <ul style="list-style-type: none"> <li>• Check with prospective staff's prior employers for substantiated and ongoing investigations alleging sexual exploitation, abuse, and harassment (SEAH); and</li> <li>• Respond to requests for information on substantiated and ongoing investigations into allegations of SEAH concerning current and former staff from other organizations as</li> </ul>	Human Resources

	part of their recruitment process and participation in the Misconduct Disclosure Scheme. Any candidate indicated to be a risk to children or adults through the screening process detailed above, will be reviewed for placement on the "Do Not Hire" list. In addition, an employee terminated for misconduct will also be reviewed for placement on the "Do Not Hire" list.	
Procedure 4: Staff Learning & Development		
1	The Education Director shall develop and maintain appropriate training materials to support the onboarding of new staff, refresher training for current staff, and more specialized training for staff where appropriate.	Education Director
2	All COCD employees, volunteers, interns and sublessees must complete safeguarding and human trafficking training which must include details of the Safeguarding and Counter-Human Trafficking Policy, guidance on promoting a culture where children's and adult's rights are observed, how to identify potential harm to program participants and how to report allegations and suspicions of abuse. This training will be completed within 45 days of hire and on a biannual basis.	All staff, volunteers, partners and sublessees
3	Staff responsible for responding to reports or disclosures of safeguarding violations will complete specific training in receiving and responding to disclosures. Such training will be completed prior to the staff members receiving and responding to reports and disclosures.	Executive Director
4	As necessary and appropriate, additional guidance will be provided on behavioral expectations in specific contexts (e.g. classrooms).	Safety Director
Procedure 5: Safe Programming		
1	The Safety Director shall develop and maintain tools and guidance to assist programmatic and operational Divisions to assess the risks to children and adults arising from potential new or modified projects or activities and how to engage children, their caregivers, and adult program participants in monitoring these risks. At minimum, all program and activity-level risk assessments will consider the following (including budgeting impacts):	Safety Director

	<ul style="list-style-type: none"> <li>• Obtaining informed consent from guardians and child assent;</li> <li>• Managing sensitive data on program participants;</li> <li>• Mitigating risks of exploitation, abuse, and neglect;</li> <li>• Ensuring no child or adult is excluded from program or service activity because of discrimination, including, without limitation, discrimination on the basis of disability, racial &amp; ethnic heritage, national status, tribal affiliations, religious beliefs, languages, gender or gender association, LGBTI+ identity, and/or medical/physical conditions; and</li> <li>• Appropriate staffing ratios of adults to children.</li> </ul>	
2	Safeguarding risks are assessed before initiating a new project or activity or a significant change to an existing project or activity. Identified Safeguarding risks will be documented and will be used to inform a written mitigation strategy to include specific actions and timelines. Completed program or activity-level risk assessments and any accompanying documents will be kept on file by the division for review and auditing purposes.	Safety Director
3	M&E teams embed safeguarding considerations within Monitoring and Evaluation frameworks. MERL staff will flag any area of concern or improvement identified to Safeguarding Advisors or Focal Points to ensure that action plans to address safeguarding risks or procedural gaps are in place.	Safety Director Monitoring & Evaluation
Procedure 6: Partners, including Sublessees		
1	All potential partners and sublessees are assessed for safeguarding capabilities.	Safety Director
2	Before signing an MOU with a potential partner, or before permitting a potential lessee to sign a lease, will acknowledge receipt of our Safeguarding policy, and agree to follow it.	Executive Director
3	Agreements with Sublessees and other partners, when they are provided with access to COCD program participants or their data, or as otherwise required by donor requirements, must include a commitment to comply with COCD's Safeguarding Policy (or the Partner's own substantially similar policy, as determined by the Managing Director, Safeguarding) concerning procedures for reporting and investigating concerns involving breaches of the	Executive Director

	policy.	
4	<p>Sublessees and other partners, where appropriate, will be responsible for reporting safeguarding concerns related to COCD funded activities, as outlined in COCD Safeguarding Policy and Procedures. The partner will be responsible for conducting its own investigation into reported concerns. Depending on the results of the safeguarding partner assessment, COCD may investigate if the partner does not have the ability to carry out an investigation in a child and survivor-centered way and when agreed upon with the partner.</p>	Executive Director
<b>Procedure 7: Program Visits and Other Events</b>		
1	<p>Potential visitors to sites where children are present are known. Two weeks prior to a potential visit, the individual must submit a copy of a driver's license, contact information, a reason for the visit and a reference.</p> <p>All visitors are checked against the National Sex Offender Registry.</p> <p>This applies to digital and physical environments.</p>	Safety Director
2	<p>Visitors will submit a signed Safeguarding policy acknowledgment.</p> <p>This applies to digital and physical environments.</p>	Program Director
<b>Procedure 8: Marketing, Media and Advocacy</b>		
1	<p>The Marketing Team will adopt and maintain standards for COCD's collection of images, video, other recordings, and related data from program participants, their caregivers, and their communities for marketing, media/communications, and advocacy purposes. Where possible and appropriate, this may include the adoption of COCD-wide content guidelines. At minimum, these standards shall require:</p> <ul style="list-style-type: none"> <li>• Obtaining assent from children and informed consent from adult program participants and caregivers;</li> <li>• Making certain that images and other information used do not include information that could be used to identify any Child, such as a child's full name,</li> </ul>	Marketing Director

	<p>location and image;</p> <ul style="list-style-type: none"> <li>• Protecting against the collection or use of images, videos, or other recordings that would exploit Program Participants or place them at greater risk; and Affirming that Child or Adult program participation will not be limited or restricted if they decline to assent/consent to participate in the fundraising, marketing, media, and advocacy processes.</li> </ul>	
2	<p>Images, video, or audio recordings for COCD's use should be collected and stored on agency-owned devices wherever possible. Prior written approval from the Marketing Director must be obtained prior to using a personal device to collect images, video, or audio recordings for COCD. Any content collected on a personal device must be transferred to an agency system as soon as possible and then deleted from their personal device.</p>	Marketing Director
<b>Procedure 9: Day Care, when active</b>		
1	Parents' submit birth certificate of all children, to confirm parenthood	Safety Director
2	Parents submit a list of permitted pick-up people and any excluded people from pick up.	Safety Director
3	Parents sign their child in and out.	Daycare Personnel
4	Any irregularities are reported to the Safety Director immediately.	Safety Director
5	To enter the building, people ring the bell. The staff member looks at their image through the security camera and asks their name. If unknown, entry is not granted, and the Safety Director is immediately notified.	Safety Director
6	Any non-daily pickup person must show their license, if unknown. Only approved people are permitted to pick-up children.	Daycare Personnel
<b>Procedure 10: Reporting</b>		
1	Mechanisms for reporting safeguarding concerns that are child-friendly, accessible, confidential, and effective are in place and monitored.	Safety Director
2	Reporting procedures must be easily accessible,	Safety Director

	known to, and understood by all program participants, their families, communities, Representatives, and employees of partner agencies.	
<b>Procedure 11: Audit and Review</b>		
1	<p>Analysis of events informs updating of policies and procedures.</p> <p>No more than three years will pass before an analysis of policies and procedures is performed for continual review and updating.</p>	Safety Director
<b>Procedure 12: Exceptions</b>		
1	Any potential exception must be submitted to the Safety Director no less than two weeks prior to the proposed event or activity.	Safety Director
<b>Related Documents</b>		
1	Safeguarding and Counter Human Trafficking Policy	n/a
2	Reporting and Resolving Policy Violations and Other Concerns Policy	n/a