

EVERY CHILD MATTERS EVERYWHERE IN THE WORLD  
HOW WE SAFEGUARD CHILDREN

# CHILD PROTECTION POLICY

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# 1. INTRODUCING THE REVISED CHILD PROTECTION POLICY

## 1.1 Why we need a revised Child Protection Policy

The British Council takes the welfare and safety of children very seriously. A comprehensive Child Protection Policy (also referred to as the Policy) was originally drafted in October 2010<sup>1</sup>, and revised after consultation in 2015 (i.e. this current version of the Policy).

Since 2010<sup>2</sup>, considerable knowledge has been gained by the British Council both in terms of the nature of child protection risk the organisation faces and experiences of implementing the Child Protection Policy. Over this time period the Corporate Child Protection Team was expanded and strengthened and Child Protection Networks established in the regions and Strategic Business Units (SBU) in the UK. Significantly during this period the British Council has been externally certified as level 1 'child safe' by Keeping Children Safe<sup>3</sup> (KCS) in July 2015. The external KCS assessment commended a number of work practices but also identified policy gaps and areas of work that require particular attention in the next stage of policy maturity and implementation. Critically to meet international standards it is essential that the scope of the policy covers **contact with** and **impact upon children** and this relates to staff, programmes and operations.

It is good practice to regularly review policies in order to assess whether they are still applicable, and to revise them accordingly. This new version of the Child Protection Policy was drafted following consultations across the organisation including; a global online survey of staff; discussions with Child Protection Strategic Leads and staff with key functions under the policy; and consultation with children from across the regions.

## 1.2 Definitions used in the Child Protection Policy

For ease of reading the Policy, and to prevent having to repeat lengthy definitions throughout, the following terms are used:

### **Child:**

In line with the United Nations Convention on the Rights of the Child<sup>4</sup> (UNCRC), 1989, under the Policy a child is defined as anyone who has not reached their 18th birthday.

Although the national laws in countries we work may have different ages at which a child is considered an adult, or at which a child can give consent or is responsible, we use the definition of a child according to international law as set out in the Convention on the Rights of the Child.

### **Staff:**

The term staff applies to all those working in an individual capacity with the British Council, irrespective of the type of contract used. This covers paid and unpaid staff and volunteers engaged on a one off, short or long term basis. It also covers consultants and Comensura contracted temporary personnel. Staff applies equally to national, international and UK personnel.

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<sup>1</sup> An updated version of the Policy was issued in 2012, but this was not a full revision of the original 2010 Policy.

<sup>2</sup> Note as part of this process, the British Council carried out a pilot of the Child Safe Programme in 2010/11 before rolling out the programme globally.

<sup>3</sup> Keeping Children Safe (KCS) is a network organisation whose members work together to develop and implement international standards for safeguarding children. The British Council is a member of KCS.

<sup>4</sup> The United Nations Convention on the Rights of the Child is the international framework which sets out the specific rights of children, including the right to protection. Over 190 countries are signatories to the Convention

### Partners, Suppliers & Contractors:

The terms 'partners, suppliers and contractors' relates to all those we have a contract or agreement with to provide goods or services or collaboration. There may be financial or some other benefit, but this is not essential. It includes implementing partners who carry out work on our behalf and also other stakeholders with whom the British Council may establish a working relationship, such as Ministries and Donors / Funders.

## 1.3 What is a Child Protection Policy?

A Child Protection Policy is an organisation's commitment to protect children from abuse, exploitation and organisational negligence – i.e. how it safeguards children. Safeguarding can be defined as:

**'Child Safeguarding is the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children, that is that they do not expose children to the risk of harm and abuse, and that any concerns the organisation has about children's safety within the communities in which they work, are reported to the appropriate authorities.'**

*Keeping Children Safe*

For the British Council there are major challenges in both developing and implementing a Child Protection Policy because of the number of countries and different contexts we work in and the diversity of our operations. This Child Protection Policy sets out the broad framework and expectations relating to safeguarding children. It is recognised that at country level, teams will have to identify how to fulfill the requirements of the Policy, given the local operating conditions and legal provisions.

**The policy is mandatory and must be applied in all situations where the British Council, or our partners, works.**

The British Council has a zero tolerance risk approach to child safeguarding. In practice this means that all necessary efforts must be made to comply with the Policy, irrespective of cost implications or operational inconvenience.

Where it is not possible to comply with the Policy (for example if there are laws governing employment which affect local recruitment practices or for security reasons) this must be brought to the attention of the Corporate Child Protection Team so an appropriate alternative course of action can be agreed. Failure to do this is a breach of the Policy.

Our Policy considers two axis of intervention:

- **PREVENTATIVE** – to reduce the likelihood of a child being harmed or abused.
- **RESPONSIVE** – taking actions to make sure that where concerns are raised or situations of suspected harm or abuse are identified, appropriate action is taken to ensure the child is assisted and to prevent similar situations occurring again.

## 1.4 Principles underpinning the Child Protection Policy

A number of key principles underpin the provisions of the Child Protection Policy. These include:

- **Best interests of the child** are paramount and shall be the primary consideration in our decision making.
- **Respect for children's rights**, including the right to protection and the right to participate in

decisions affecting their lives, as enshrined in the United Nations Convention on the Rights of the Child, 1989.

- **Equality of opportunity** to ensure that all children have the opportunity to enjoy our activities safely regardless of their gender, ability, race, ethnicity, circumstances or age. Vulnerable children require particular attention in order to optimise their safety and protection and promote their access to opportunities.
- **Consultation** with children and their families regarding the implementation of the Policy and procedures developed to support its implementation.
- **Cultural sensitivity and recognition of local context** in decision making and in informing our procedures.
- **Accountability and being responsible** in order to meet our obligations regarding our duty of care towards children, and taking action where we believe that a child is at risk or is actually harmed.
- **Providing training and support** to those working with the British Council so that they are able to recognise, prevent and respond to child protection risks and incidents.
- Working in an **honest and transparent** way by informing those we work with, including children, about our Child Protection Policy, and how we work to safeguard children.
- **Ensuring confidentiality** to protect sensitive personal data. Information will only be shared and handled on a need to know basis - access to information must be necessary solely for the conduct of official duties.
- **Working with others to protect children** both across the British Council and with other organisations. This includes law enforcement and specialist child welfare agencies where necessary.
- **Monitoring the implementation** of the Child Protection Policy on a regular basis. The Child Protection Policy will be reviewed every three years.

## 1.5 Who is the audience for the Child Protection Policy?

The Child Protection Policy is both an internal and external document.

**The Policy is mandatory for all British Council staff, worldwide.** It also covers partners, contractors and suppliers whom we fund, and are expected to agree to work under the Policy as a condition of their involvement with the British Council. Where we are not the lead partner (i.e. we are not funding), then it is expected that we will encourage and advocate for other partners to either follow the British Council Child Protection Policy, or develop their own.

The Policy is also relevant for those with whom we engage – for example children and parents, communities and other stakeholders such as government departments and ministries, civil society and non-governmental organisations. This is to clearly articulate our organisational commitment to protecting children from harm.

## 1.6 What are our responsibilities?

As a UK based organisation working overseas, in addition to local legislation, the British Council has specific legal and regulatory obligations under UK law<sup>5</sup> in relation to the protection of children in all countries we work and the expectations we place on partners, contractors and suppliers. **Everyone shares responsibility for safeguarding and promoting the welfare of children and for supporting the implementation of the Policy generally, irrespective of individual roles.** In addition some post holders, such as managers and those with additional responsibilities, have specific responsibilities for child protection, as articulated in this Policy.

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<sup>5</sup> Since the UK is a signatory to the UNCRC, 1989, this important legal instrument also informs our practice.

Irrespective of their role or function, all those working for or on behalf of the British Council, in any capacity, have a responsibility to:

- Report all allegations or concerns about actual or suspected situations of abuse involving a child or children known to the British Council.
- Report all allegations or concerns about actual or suspected situations of abuse involving a child or children even if the child is not known to the British Council (for example a sibling of a child attending a British Council Teaching Centre)
- Report all allegations or concerns about actual or suspected staff misconduct or criminal activity involving the abuse of a child or children.

In 2014 the Charity Commission made reporting a serious child protection incident a regulatory requirement; failure to report could result in regulatory action. How to report a concern or allegation is outlined in Section 4 of this Policy. Further details can also be found in the British Council's Child Protection Response Plan.

## 1.7 Putting the Policy into Practice

Child Protection Procedures articulate how an organisation puts its Policy into action. Details of our Child Protection Procedures (for example incident management, dealing with disclosures, safe recruitment etc.) can be found on the Child Protection Intranet or by contacting the Corporate Child Protection Team (email: [childprotection@britishcouncil.org](mailto:childprotection@britishcouncil.org)).

## 1.8 Relationship with other British Council policies and procedures

There are numerous policies and procedures that have already been developed by the British Council and which are relevant to our work in safeguarding children – for example the Code of Conduct, Health & Safety, Equality, Diversity and Inclusion (EDI), Teaching Quality Standards, E-Safety and Data Protection. This Policy is intended to compliment and reinforce the child protection aims of these standards and procedures.

Considerable work has been done to harmonise the various policies that exist, however if any discrepancy is discovered or there is confusion regarding how to apply a particular policy, guidance should be sought from the Corporate Child Protection Team, who will be able to support country offices and SBUs in making the best decision for children.

## 1.9 Complaints

In this Policy it is important to understand the difference between a complaint and an allegation as our response will be different. **Complaints** are an oral or written expression of dissatisfaction or concern about facilities or services. An **allegation** is an oral or written declaration of wrong doing or an assertion of misconduct or criminal behaviour, the validity of which has not been established. This section deals with a complaint about the implementation of the Child Protection Policy by the British Council.

Anyone, including children and their parents or partners, who wish to make a complaint to express dissatisfaction or concern about how they have been treated by the British Council regarding the implementation of this Policy should in the first instance speak with their main contact point at the British Council, who can then arrange for the appropriate follow up actions to be taken. Alternatively, people can contact the Child Protection Focal Point or the Corporate Child Protection Team.

For staff employed by the British Council, grievance procedures already exist within 'Essential HR' in terms of how to complain about unfair treatment.

The British Council has a policy on whistleblowing, the 'Speaking Up' Policy which details how staff can

raise complaints and the safeguards that will be put in place to support them .

## 2. UNDERSTANDING CHILD PROTECTION ISSUES

It is important to have a shared understanding of child protection and what it means so that there is consistency and agreement regarding the application and implementation of our Child Protection Policy.

### 2.1 What are we protecting children from?

In the context of this Policy, 'child protection' does not mean preventing accidents (covered by our Health and Safety Policy) or making sure that a child's rights (as defined in the United Nations Convention on the Rights of the Child) are fully implemented. Instead we are referring specifically to the protection of children from abuse.

The British Council uses the definition of abuse commonly used by the World Health Organization<sup>6</sup>:

**'Child abuse' or 'maltreatment' constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power'.**

### 2.2 General definitions of child abuse

Four main categories of abuse are recognised under the Child Protection Policy:

**Physical Abuse:** This may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child.

**Emotional Abuse:** This is the persistent emotional ill-treatment of a child such as to cause severe and long lasting effects on the child's emotional and psychological development. It may involve conveying to children that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It can also involve age or developmentally inappropriate expectations being imposed on children, or causing children frequently to feel frightened or in danger. Some level of emotional abuse is involved in all types of maltreatment of a child although it may occur alone.

**Neglect:** This is the persistent failure to meet the child's basic physical and / or psychological needs, where the parent has the means to do so, likely to result in the serious impairment of the child's development. For example, inadequate supervision which leaves a child in a dangerous situation where they could be harmed (but only if this can be avoided). Neglect can be particularly difficult to recognise, especially in countries where there are few resources and / or high levels of poverty and deprivation.

**Sexual Abuse:** This involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening or gives consent. The activities may involve physical contact, including penetrative (e.g. rape) or non-penetrative acts. They may also include non-contact activities, such as involving children in looking at pornography, in making indecent images of children, or encouraging children to behave in sexually inappropriate ways.

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<sup>6</sup> For further information see [www.worldhealthorganization.org](http://www.worldhealthorganization.org)

Other types of abuse commonly recognised, such as commercial sexual exploitation and trafficking, are complex manifestations of a combination of the above four categories. It is important to highlight that **bullying** can also be a form of abuse depending on its severity. Although we commonly think of adults as those who abuse, children can also be perpetrators of abuse.

Abuse can be a single, one-off event or ongoing, including the accumulation of a number of seemingly less serious incidents. It can take place in all settings<sup>7</sup> including in the family, school, community, institutions or online (for example digital and augmented technologies such as smart phones). Abuse online can take many forms including sexual harassment and child abuse images.

**When considering specific cases, all decisions regarding what constitutes abuse must be made in consultation with the Corporate Child Protection Team.**

## 2.3 Cultural sensitivity

The British Council aims to work in ways which are culturally sensitive and respect the diverse nature of the people and locations in which we work. We recognise that there are many different ways of taking care of and protecting children, and we will seek to safeguard children in ways which are culturally sensitive and appropriate to the context.

However we believe that every child matters everywhere in the world and that culture must never be used as a reason or excuse to abuse children.

It is acknowledged that protecting children within the legal framework required of the British Council as a UK based organisation, and as articulated in this Policy, while being culturally sensitive can be a difficult balancing act, as understandings of what is harmful may differ.

The Corporate Child Protection Team should be consulted for further guidance as necessary.

## 3. PREVENTATIVE ACTIONS

The key to child safeguarding is abuse prevention. It is widely recognised that organisational awareness and good practice can promote positive staff actions, reduce opportunities for offending and enable earlier detection and response to child protection concerns. The poor design, development and delivery of programmes and projects can negatively impact children, who may not be abused but may still be harmed as a result of our activities.

### 3.1 Systems and procedures to prevent situations of abuse

#### 3.1.1 Corporate Child Protection Team

The Corporate Child Protection Team, based in the UK and in the regions, is a specialist team established to support and assist countries and SBUs with the implementation of our Child Protection Policy and to give guidance in the event of a child protection allegation or concern.

Contact details for the team members can be found on the Child Protection Intranet. The team can also be contacted by email at [childprotection@britishcouncil.org](mailto:childprotection@britishcouncil.org)

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<sup>7</sup> As documented in the UN Violence against Children Study 2005 – [www.unviolencestudy.org](http://www.unviolencestudy.org)



### **3.1.2 Child Protection Focal Point**

In order to assist with the implementation of the Child Protection Policy, all Country Directors and Directors of SBUs at Corporate Level must nominate and support someone to act as the trained Child Protection Focal Point. A role description including a work deliverable is available for this role.

A Child Protection Focal point must be appointed in all countries where there are operations, even if those operations are not concerned with the provision of services, programmes, projects or activities for children. If the Focal Point role is adapted it must be done in consultation with the Regional Child Protection Manager.

Where there is a change of Child Protection Focal Point, the Country Director / SBU Lead is responsible for communicating the name of the new Child Protection Focal Point in writing to the Corporate Child Protection Team.

Primary responsibility for supporting the Country Child Protection Focal Point rests with the designated Regional Child Protection Manager. For Child Protection Focal Points within the SBUs at Corporate Level in the UK, responsibility for support is with the relevant Child Protection Manager based in the UK.

In many countries a single Child Protection Focal Point will be sufficient, but a deputy should be available to act in their absence. In larger countries where there is a wide geographic area or in large operations where different parts of the operation (e.g. teaching, exams, and programme) work with a lot of children, it may be necessary to have a number of deputies representing each operational business area that are led and coordinated by the Country Child Protection Focal Point.

All countries and SBUs at Corporate Level should establish a National / SBU Working Group with representatives from various departments to facilitate effective communication and liaison regarding the implementation of the Policy at all levels.

### **3.1.3 Child Protection Strategic Leads**

Each Region and SBU should also appoint a senior member of staff to act as a Child Protection Strategic Lead. The role of the Child Protection Strategic Lead is to act as a champion and advocate for child protection and to support the efforts of the relevant Child Protection Manager / Regional Child Protection Manager and the Corporate Child Protection Team generally in implementing the Child Protection Policy.

Responsibility for appointing Child Protection Strategic Leads rests with Regional Directors and the Directors of Strategic Business Units.

### **3.1.4 Child Safe Action Plan (CSAP)**

On an annual basis, as requested by the Corporate Child Protection Team, all countries and corporate level SBUs must prepare an annual plan which sets out what actions they need to take in order to ensure adequate abuse prevention measures are in place and that children are protected. The plan must also detail any action necessary to implement the Child Protection Policy as identified in the annual Child Protection Self Audit.

The Child Safe Action Plan (CSAP) must be agreed with the Corporate Child Protection Team, and signed off by the relevant Country Director or SBU Lead.

### **3.1.5 Child Protection Risk Assessments for events and trips involving children**

Before undertaking any off-site (i.e. not on British Council premises) activities or programmes, including exams, with children a risk assessment must be completed and steps put in place to mitigate any identified risks. A risk assessment must also be completed for one off events such as competitions and awards in order to ensure that such events are safe for children.

Essential information such as parental and children consent forms, medical information and emergency

contact details must also be collated and accessible throughout the event in case of an incident.

### **3.1.6 Contracts and Partnership Agreements**

All contracts and partnership agreements, irrespective of the nature or type of agreement, must contain specific reference to, and agreement to working within, the British Council Child Protection Policy.

Where organisations have their own child protection policies, these may be applied instead of the British Council Child Protection Policy, but agreement must be sought from the Corporate Child Protection Team before any such arrangement is made.

The Corporate Child Protection Team should be consulted for further guidance as necessary.

### **3.1.7 Child Protection Integration into Existing Business Practices**

Child protection must be integrated and actively managed into existing business processes and systems to promote and mainstream abuse prevention throughout. Examples of where child protection has been incorporated and integrated into existing business practices include the Teaching Quality Standards, Exams Quality Compliance and Assurance (QCA), Early Years, and e-Safety.

### **3.1.8 Design and Delivery of Products and Services**

Child safeguarding must be considered from the outset, during proposal development and planning stages. Special consideration to safeguarding must be given when working with children in difficult and challenging locations (such as conflict areas) or where children may be especially vulnerable (for example due to young age or disability) in order to ensure that all risks are adequately considered and addressed.

The Corporate Child Protection Team will provide specific guidance and support during this process where requested.

### **3.1.9 Use of images and photographs of children**

The British Council has e-safety procedures which guide the use of images of children and which must be applied in all situations. This guidance applies to all individuals who are to have access to images or are users of photographic equipment. This includes children, parents and carers, staff, visitors, contractors and community users.

### **3.1.10 Use of Technology**

E-Safety Procedures and guidance have been developed setting out the British Council's expectations regarding online engagement with children. E-Safety refers to not only Internet technologies but also electronic communications via mobile phones, games consoles, and wireless technology.

The E-Safety procedures highlight the benefits, risks and responsibilities of using information technology. They also emphasise the need to educate children and staff and provide assistance for parents where necessary about the benefits, risks and responsibilities of using information technology.

## **3.2 Safer recruitment to select staff suitable to work with children**

'Safe' recruitment and pre-employment checks that are undertaken as part of the recruitment process are the organisation's first chance to deter potential offenders. The British Council will take all reasonable measures to prevent unsuitable individuals from working with children. This includes not only where staff directly works with children but also where they can have access to children.

Further guidance and procedures to be followed when recruiting staff can be found in the HR and Child Protection recruitment intranet pages.

### 3.3 Education and training to equip staff and others with skills and knowledge

In order to ensure the effective implementation of the Child Protection Policy into action, following appointment, all staff, partners and contractors will be given orientation and training on our Child Protection Policy, appropriate to their role.

1. All staff must be inducted on child protection as it is essential that all staff are aware of their own responsibilities, as well as organisational policy and practice. Child protection induction must include completion of the global mandatory e-learning course – Child Protection Basic Awareness
2. Staff should repeat the Basic Awareness course every three years as refresher training.
3. Periodic training and briefings on child protection must be made available to all staff in accordance with the Child Safe Action Plan developed in countries and at corporate SBU level.
4. Child Protection Focal Points must complete the e-learning course produced specifically for them. Additionally, in recognition of the enhanced responsibility for Child Protection Focal Points under the Policy, annual face to face training and other periodic updates facilitated by the Corporate Child Protection Team must be arranged and attended.
5. All managers (Band 8, local equivalents and above) and other staff responsible for activities and projects with children should complete the e-learning course on Managing Child Safe Organisations
6. Where staff are contracted by other employers, or when working with partners, contractors and suppliers, the British Council will brief them on our Child Protection policy and ask for information on how their organisation works to protect children (such as their own Child Protection Policy).

While the British Council has a responsibility to ensure that training and education is provided in accordance with the Policy, staff has individual responsibility for accessing and participating in such training.

### 3.4 Advice and support

All staff will have access to advice and support regarding child protection and the implementation of the Child Protection Policy, via the Child Protection Focal Point and the Corporate Child Protection Team. Further guidance regarding specific issues, such as what to do if you are worried about a child and safer use of technology is available on the Child Protection intranet.

In addition country offices should identify and establish links with local child protection and law enforcement agencies that can provide specific information and guidance on child protection according to the local legal, cultural and operating context.<sup>8</sup>

Where staff have concerns regarding the implementation of the Child Protection Policy or its applicability, they should contact their local Child Protection Focal Point or the Corporate Child Protection Team.

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<sup>8</sup> To support countries, the Corporate Child Protection Team has produced information on law enforcement and child welfare agencies worldwide. For further information see the child protection intranet site.

A corporate Child Protection Intranet site will be maintained and updated by the Corporate Child Protection Team. This contains details of further resources and guidance necessary to support the implementation of our Child Protection Policy.

### 3.5 Information and communication to raise awareness

All staff should be provided with a copy of the Child Protection Policy and given the name and contact details of their local Child Protection Focal Point.

All partners, suppliers and contractors should be made aware of the existence of our Child Protection Policy, and provided with copies on request.

All customers including children and parents who participate in projects and programmes should be made aware of our Child Protection Policy and its main provisions. This should include advice about who to contact in the case of a concern / allegation or a complaint.

The Child Protection Global Policy Statement and Child Friendly Version of the Child Protection Policy should be translated into local languages using a format that is appropriate for the context.

## 4. RESPONDING TO ALLEGATIONS & CONCERNS

The British Council has a duty of care under this Policy to ensure that we respond appropriately to situations of actual or suspected abuse and harm both from within the organisation and from outside the organisation. This is to promote the best interests of the child, prevent similar situations from occurring in the future and ensure that legal action is taken in relation to any crimes that may have been committed.

All allegations and concerns will be taken seriously, irrespective of the identity of the alleged perpetrator and victims, and regardless of how 'unbelievable' the situation may seem.

**It is not the responsibility of staff to decide whether or not child abuse has taken place. All staff, however, has a mandatory duty to report any concerns – even where these are vague and are just a suspicion or 'intuition' that something is not right.**

No staff member can agree to keep information regarding actual or suspected abuse 'private' as a personal confidence.

The British Council is not an investigative authority, and therefore where appropriate referrals will be made to relevant child welfare and law enforcement agencies. The British Council will seek agreement to making a referral from the child and their parents/guardians unless this places the child at increased danger. In such cases the decision to refer without prior agreement must be agreed with the Corporate Child Protection Team before the referral is made. No details regarding the circumstances of children and their families will be passed to individuals or other organisations apart from child welfare / law enforcement without the express permission of the child and their parents / guardians.

The **Child Protection Response Plan** details the procedures for responding to allegations and concerns regarding a child at risk in their family and community and managing allegations against an employee. For further guidance on reporting an allegation or concern contact the Child Protection Focal Point or the Corporate Child Protection Team who will provide support during this process.

## 5. IMPLEMENTATION MONITORING AND EVALUATION

### 5.1 Accountability

Accountability for the implementation of the Child Protection Policy at country level rests with the Country Director. Within SBUs and departments of support functions, such as Finance, accountability rests with the SBU Directors or Heads in the UK. Ultimate accountability for Child Protection within the British Council globally rests with the CEO.

All breaches of the Child Protection Policy will be considered as serious and follow up action taken.

### 5.2 Feedback from customers, including children

On a regular basis, but not less than every three years, countries and SBUs should seek feedback from customers regarding the implementation of the Policy at local level in order to ascertain whether any adjustments need to be made as to how it is operationalised.

It is recognised that in smaller operations or in countries which are working in exceptionally challenging operating contexts, this may not be feasible. In such cases agreement should be sought from the Corporate Child Protection Team regarding an alternative timeframe for feedback.

### 5.3 Child Protection Self Audit

On an annual basis, as requested and using a format set out by the Corporate Child Protection Team, every country and SBU at corporate level will undertake a self-audit of child protection. The purpose of this audit is to measure progress in implementing the Child Protection Policy and identify gaps in safeguarding, and to contribute to the development of the annual Child Safe Action Plan (see Section 3.1.4).

The audit should be prepared by the Child Protection Focal Point, in conjunction with other staff, and reviewed by the Corporate Child Protection Team.

After review, audits must be signed off by the relevant country director or SBU lead.

### 5.4 Resources

Each country, region and SBU shall set aside appropriate financial and human resources to ensure the effective implementation of the Child Protection Policy. As a zero tolerance policy, the British Council requires that 'all *necessary measures [are taken] to achieve compliance, regardless of cost*'.

### 5.5 Other Monitoring Mechanisms

As requested Country Directors and SBU Leads may be required to provide information regarding the implementation of the Child Protection Policy through other reporting and monitoring mechanisms established by the British Council – such as Internal Audit, top risk reporting and business continuity plans.

In addition to internal monitoring mechanisms, the implementation of this Policy is also subject to external monitoring through Keeping Children Safe and other relevant bodies such as the Charity Commission.

## **5.6 Review of Child Protection Policy**

This Policy will be reviewed on a regular basis, not less than every three years.

Responsibility for the review of the Child Protection Policy lies with the Corporate Child Protection Team.

**Corporate Child Protection Team  
November 2015**

**Formal review due 2018**