Plan International USA

Policy on safeguarding children and young people globally
Plan International USA: Policy on Safeguarding Children and Young People Globally

Purpose

Plan International USA recognizes that violence against children and young people is prevalent throughout the world and in all societies. Violence against children includes physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment and sexual abuse. Furthermore, children and young people may be vulnerable and at risk due to gender, sexual orientation, ethnicity, disability, age or illness.

Plan USA is fully committed to ending violence against children and young people and acknowledges that we have a duty to promote the gender-responsive safeguarding of children and young people, particularly those with whom we work or are in contact.

The purpose of this policy is to ensure that:

— All who work for and engage with us are skilled, confident and well-supported in understanding and meeting their responsibilities to safeguard children and young people from violence and to engage positively with children and young people in ways that enhance the achievement of our purpose.

— We have procedures in place to prevent and deal with the actions/behavior of our staff, volunteers, board members, sponsors, donors, partners, visitors or other associates, as well as our actions/behavior as an organization, that result in violence against a child or young person and/or places them at risk of the same.

— Children and young people we work with are aware of our responsibilities to prevent and respond to any harm against them arising from actions and behaviors of our staff, volunteers, board members, sponsors, donors, partners, visitors and other associates, as well as the routes for reporting such incidents.
Definitions

When used in this document:

“Associate” refers to a range of contracted paid and nonpaid individuals who have committed to work with or support Plan USA. It includes, among others, board members, volunteers, interns, sponsors, researchers, donors, consultants and contractors, staff, visitors and partners.

“Child,” in line with the U.N. Convention on the Rights of the Child and for the purposes of this policy, is defined as any person — girl, boy, young woman, young man and children of other gender identities — under 18 years old. (UNCRC Article 1). (See definition of young person/people or youth).

“Direct beneficiaries” are the people who are the target of and who we know will be immediately affected by one or more project outputs, irrespective of whether these are delivered directly by Plan International or by partners or organizations who are acting on behalf of Plan International.

Direct beneficiaries are individuals who receive materials, equipment or interventions such as training, awareness raising, mentoring or other personal support.

Direct beneficiaries may be a single member of a household (for example, a mother participating in training on nutrition); or it may refer to all members in the household (for example, distribution of hygiene kits or malaria nets that the whole family use).

“Harm” is any detrimental effect on a child’s or young person’s physical, psychological or emotional well-being. Harm may be caused by abuse or exploitation whether intended or unintended.

“Manager” refers to a staff member who has responsibility for line managing or supervising the work of staff or associates.

“National Organization” or “NO” refers to a legal entity that has signed a Members’ Agreement and License Agreement with PII.

“PII” refers to Plan International, Inc., including when operating through one of its subsidiaries. It generally includes international headquarters, regional offices, liaison offices and Country Offices.

“Safeguarding children and young people” includes the responsibilities and preventative, responsive and referral measures that we undertake to protect children and young people, ensuring that no child or young person is subject to any form of harm as a result of their association with the organization. This includes ensuring that their contact with us, and those associated with us, as well as their participation in our activities, interventions and operations, is safe. When there are concerns over a child or young person’s welfare, or when a child or young person has been subjected to violence, appropriate and timely actions are taken to address this, and incidents are analyzed so as to ensure continued learning for Plan USA.
“Gender-responsive safeguarding” is a safeguarding approach that:

— Takes full account of gender in considering the specific safeguarding needs of girls, boys and children of other gender identities.

— Integrates safeguarding measures that address protection risks for children and young people (girls, boys, young women, young men and children of other gender identities) that stem from issues relating to gender bias and discrimination.

— Supports the empowerment and fosters the inclusion of girls, particularly in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection.

“Staff” refers to individuals who receive a regular salary for work at Plan International.

“Violence” against a child or young person includes: all forms of physical or mental violence; injury or abuse; neglect or negligent treatment; emotional ill-treatment or psychological violence; sexual abuse and exploitation; harassment; and commercial or other exploitation of a child or young person. Acts of violence can also take place online through, for example, social media or mobile phones. It may be an intentional act involving the use of physical force or power or it may be failing to act to prevent violence against a child or young person. Violence consists of anything which individuals, groups, institutions or organizations do or fail to do, intentionally or unintentionally, which either results in or has a high likelihood of resulting in actual or potential harm to the child or young person’s well-being, dignity, survival and development.

“Young person/people” or “youth,” in line with U.N. definitions, includes individuals — young women, young men and young persons of other gender identities — who are 18 to 24 years old. This group spans the categories of “children,” “adolescents” and “adults,” but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.
Policy statement

We are fully committed to the gender-responsive safeguarding of all children and young people from all forms of violence. We take very seriously our responsibility and duty to ensure that we, as an organization, as well as anyone who represents us, do not in any way harm, abuse or commit any other act of violence against children and young people or place them at risk of the same.

We promote child- and youth-safe practices, approaches, interventions and environments which respect, recognize and respond to the specific safeguarding needs and address the protection risks of differing gender and other identities. We will challenge and do not tolerate inequality, discrimination or exclusion.

We respond to a child or young person who may be in need of protection and/or psychosocial support, and their welfare and best interests will be of paramount consideration at all times.

We ensure all who work with and engage with us understand and are supported to meet their safeguarding roles and responsibilities. We take positive action to prevent anyone who might be a risk to children and young people from becoming involved with us and take stringent measures against any staff member, associate or visitor who perpetrates an act of violence against a child.

We promote the active involvement of children and young people in their own protection.

The implementation of this policy is guided by the following set of principles:

1. All children and young people under the age of 18 have equal rights to protection from all forms of violence, as declared in Article 19 of the U.N. Convention on the Rights of the Child. In addition, the Universal Declaration of Human Rights recognizes the dignity, worth and equal rights of people of any age, thus including young people between the ages of 18-24.

2. The human rights of children and young people will be respected and applied to all, irrespective of age, sex, gender, gender identity, sexual orientation, nationality, ethnicity, color, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socioeconomic or cultural background, class, history of conflict with the law or any other aspect of their background or identity. Inequality, exclusion and discrimination will be challenged and will not be tolerated.

3. All children and young people should be encouraged to fulfill their potential. Decisions made about children and young people will be made as often as possible with their participation and in their best interest, giving full consideration to how such decisions will affect them. Children will be encouraged to express their views, and this will be given due weight in accordance with their age and level of maturity.
4. We have a responsibility to care for and protect children and young people, especially those that are vulnerable, and to make sure they are not harmed.

5. We have particular responsibilities to children and young people with whom we come into contact. No child or young person must suffer harm, intentionally or unintentionally, as a result of their engagement, association or contact with us, whether as a sponsored child, a participant in our programs, projects, events, processes or youth advisory panels, or as part of a fundraising or influencing campaign.

6. We have a responsibility to inform and empower children and young people so that they learn about and are better able to exercise their rights to protection. We will work with children and young people to ensure they understand the essence of this policy, our safeguarding commitment and the means via which they can report policy breaches. We will also involve them in the development of safeguarding measures in accordance with their evolving capacities.

7. We are open and transparent, and will hold ourselves to account for our commitment to safeguard children and young people. Safeguarding concerns can be raised and discussed, poor practice and inappropriate behavior challenged and addressed, and our safeguarding measures continuously reviewed and strengthened to ensure we remain accountable to children, young people and their families.

8. We will act on safeguarding concerns, ensuring that our actions are timely, appropriate and centered around the child or young person, taking into account their gender and other specific safeguarding needs and vulnerabilities.

9. We work together in partnership with other agencies to promote the safeguarding of children and young people within organizations engaged with us and in the wider community.

10. We will never knowingly allow a person to become or continue to be a sponsor if the person is currently in prison for any type of crime including awaiting trial, or has committed crimes against children.

11. Our safeguarding approach recognizes and responds to the specific safeguarding risks and needs of people with differing gender and other identities. It takes appropriate measures to address gender bias and other forms of discrimination and violence which may arise as a result of this bias. It supports the empowerment and fosters the inclusion of girls in the safeguarding process, in a manner that promotes equality, equity and ultimately their increased safety and protection.

12. Our safeguarding approach is mainstreamed in all stages of our operations, thematic portfolios, programs, projects, activities, influencing work and interventions in both development and humanitarian settings, thus ensuring that these are designed and delivered in a manner that does no harm to children or young people.

In light of our commitment and accompanying principles, we give the highest priority to the safety and protection of children and young people.
We will ensure our staff, volunteers, board members, sponsors, donors, partners, visitors and other associates are supported to meet their safeguarding responsibilities and requirements, that they understand the specific risks to children and young people of differing gender and other identities, and that they know how they can work and engage in ways that increase the safety and protection of children and young people with whom we are in contact.

Our Safeguarding Implementation Standards (see Annex 2) lay down the requirements for ensuring safeguarding measures are embedded in all parts of our operations and interventions.

**Sanctions**

Breaches of this policy will be investigated in accordance with Plan USA’s code of ethics and conduct, disciplinary procedures and contractual agreements. A referral may also be made to statutory authorities for criminal investigation. Breaches may incur sanctions including disciplinary action leading to possible dismissal, termination of all relations, including contractual and partnership agreements, and where relevant, appropriate legal or other such actions.

If a legitimate concern about the suspected abuse of a child or young person 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.
Roles and responsibilities

1. All staff, board members, volunteers, sponsors, donors, partners, visitors and other associates shall:
   a. Commit and contribute to creating an environment where children and young people feel respected, supported, safe and protected.
   b. Never act or behave in a manner that results in violence against a child or young person or places a child or young person at risk of violence.
   c. Be aware of and adhere to the provisions of this policy.

2. All staff and volunteers shall:
   a. Agree, by signing, to comply with this policy, including the safeguarding code of conduct (Annex 1).
   b. Undergo criminal background checks as a condition of employment or volunteering.
   c. Report and respond to safeguarding concerns and breaches of the policy in line with Plan USA’s whistleblower policy and code of ethics and conduct.

3. Sponsors, donors, visitors, partners and other associates shall:
   a. Agree to comply with the safeguarding code of conduct (Annex 1) or comply with their own code of ethics and conduct, provided the contracting manager ensures that it complies and is consistent with this policy, and:
   b. Sign off on this safeguarding policy and undergo criminal background checks before visiting Plan International program areas and/or sponsored children.

4. All Plan USA managers shall ensure that:
   a. Children, young people and communities with which we engage, work or are in contact are made aware of the provisions of this policy to ensure they have the confidence and ability to report any incidents occurring against children and young people.
   b. Staff, associates and visitors are aware of the safeguarding implementation standards that are applicable to their role or engagement with us.
   c. They support and develop systems which maintain an environment which is safe for and prevents violence against children and young people.
   d. They are accountable for ensuring that the policy is fully embedded within their areas of responsibility in accordance with the safeguarding implementation standards.
5. **Plan USA’s Director, Ethics & Compliance; Sr. Technical Advisor, Youth Engagement & Advocacy; and Senior Director, Human Resources, shall ensure that:**

   a. Plan USA has in place procedures that are consistent with this policy and with the global “Reporting and Responding to Safeguarding Issues” document, which outlines the reporting requirements and the manner in which they are escalated. These procedures will be reviewed every three (3) years. The policy and applicable procedures will be made available in child-friendly formats.

   b. Plan USA implements our safeguarding implementation standards as they apply to our context, the people (staff, associates and visitors), children and young people with whom we engage, as well as the processes, programs, projects, events and activities we undertake.

6. **Organizations that work with us** in carrying out our programs, projects, processes, events and/or activities involving children and young people must comply with the safeguarding guidelines.

7. **Plan International** shall monitor compliance with this policy through the mandatory tracking and auditing of the safeguarding implementation standards and safeguarding code of conduct (Annex 1). Auditing against the standards will be led by PII’s Global Assurance Department. In addition, we will work with and ensure the participation of children, young people, staff, associates and visitors to review, monitor and evaluate the implementation of this policy.

If a Plan USA associate has any questions, concerns or issues regarding this policy, they may contact Kitty Holt at kitty.holt@planusa.org or Laura Brazee at laura.brazee@planusa.org.
Plan International USA is committed to creating a safe environment for children and young people. All staff have a duty to uphold the principles of the policy on safeguarding children and young people globally and commit to maintaining an environment that prevents violence against children and young people. Further to this, sexual exploitation and abuse by staff (including those that work in our humanitarian response) constitutes acts of gross misconduct and is therefore grounds for termination of employment.

As such, I agree that I will:

a. Adhere to Plan USA’s policy on safeguarding children and young people globally and be open and honest in my dealings with children and young people, their families and communities participating in programs, projects, processes, events and activities.

b. Plan USA implements our safeguarding implementation standards as they apply to our context, the people (staff, associates and visitors), children and young people with whom we engage, as well as the processes, programs, projects, events and activities we undertake.

c. Create and maintain an environment which prevents the abuse and exploitation of children and young people, ensuring that I am aware of potential risks with regards to my conduct and work, and take appropriate action so as to minimize risks to children and young people.

d. Contribute to building an environment where children and young people we engage with are:
   — Respected and empowered to participate in and discuss decision making and interventions into their safeguarding in accordance with their age, maturity and evolving capacities.
   — Well informed on their safeguarding and protection rights and what to do if they have a concern.

e. Display high standards of professional behavior 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 labor and refrain from using children and young people under the age of 18 for domestic or other labor, if such work is inappropriate, exploitative or harmful, given their age or developmental capacity, interferes with their education and recreational activities, or places them at significant risk of injury, exploitation or violence. In addition, I understand that I must not use children and young people Plan International works with, regardless of their age, for domestic or any other labor.

g. Respect the privacy and confidentiality of children and young people associated with Plan International. This means I will:
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— 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 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 authorized by Plan International and/or for Plan International business purposes.

— Never disclose, or support the disclosure of, information that identifies sponsored families or children, through any medium, unless that disclosure is in accordance with standard Plan International policies and procedures and/or has the explicit consent of Plan International. Media include paper, photographs and social media.

— Never make any contact with a child, young person or family members associated with Plan International’s work that is not supervised by a member of Plan International staff. (Plan USA employees will always be accompanied by another Plan International staff member.) Such contact may include but is not limited to visits and any form of communication via social media, emails and letters.

Always ensure that when on an official or work visit with Plan International, if I wish to take pictures of children and young people associated with the organization for personal use, I will:

— Always consult first with the local Plan International office so as 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’s policies.

— Ask permission of the child or young person (or in the case of young children, their parent or guardian), informing them of the specific purpose(s) and intended use (including how and where), and respect their decision to say no, making it clear that there will be absolutely no negative repercussions from denying such consent.

— Ensure the images are respectful and do not impact negatively on their dignity and privacy.

— Ensure that the use of the images does not put the child or young person at risk of being identified or located.

— Never upload the images of children and young people associated with Plan International to non-Plan International social media pages without the full and explicit consent of Plan International.

h. Report and respond to any concerns, suspicions, incidents or allegations of actual or potential abuse to a child or young person in accordance with Plan USA’s whistleblower policy.

i. Cooperate fully and confidentially in any Plan International investigation of concerns or allegations of abuse to children and young people.

j. Immediately disclose all charges, convictions and other outcomes of an offense, occurring either before or during association with Plan USA, relating to exploitation and abuse of a child or young person.
I will not:

a. Abuse or exploit a child or young person or behave in any way that places a child or young person at risk of harm, including through harmful traditional practices such as, for example, female genital mutilation, forced labor or child marriage.

b. Engage in any form of sexual activity or develop physical/sexual relationships with anyone under the age of 18, regardless of the local age of consent. Mistaken belief in the age of a child is not a defense.

c. Engage in sexual relationships with Plan International youth direct beneficiaries between the ages of 18-24, as these undermine the credibility and integrity of Plan International’s work and are based on inherently unequal power dynamics.

d. Use physical punishment/discipline or physical force of any kind toward children or young people.

e. Engage young people in any form of sexual activity which involves the exchange of money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior. This includes exchange of assistance that is due to beneficiaries.

f. Use language or behave towards a child or young person in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate.

g. Fondle, hold, kiss, hug or touch children or young people in an inappropriate or culturally insensitive way.

h. Have a child/children/young person with whom I am in contact in a work-related context stay overnight at my home or any other personal residential location or accommodation.

i. Sleep in the same room or bed as a child or young person with whom I am in contact in a work-related context. Where it is necessary to sleep close to unaccompanied children and young people, I will make sure that another adult is present and it is in line with authorized procedures.

j. Do things of a personal nature for children or young people with whom I am in contact in a work-related context, (e.g., taking a child/young person to the toilet/bathroom, helping them get un/dressed etc.) that they can do for themselves.

k. Spend time alone away from others with children and young people 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/young person in an open public place, where others are around and in plain view of others.

l. Hit or otherwise physically assault or physically abuse children or young people.
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m. Act in ways that shame, humiliate, belittle or degrade children and young people, or otherwise perpetrate any form of emotional abuse.

n. Discriminate against, show differential or preferential treatment to, or favor particular children and young people to the detriment of them or others.

o. Develop relationships with, engage in any practice with or develop behavior toward children and young people which could in any way be deemed or interpreted as exploitive or abusive.

p. Condone or participate in behavior of children or young people which is illegal, unsafe or abusive.

q. Use any computers, mobile phones, video/digital cameras or any such medium to exploit, harass or bully children or young people.

r. Use computers, mobile phones, video/digital cameras or other electronic devices to access, view, create, download or distribute pornography, especially abusive images of children or young people.

The above is not an exhaustive list. Staff, board members, volunteers, sponsors, donors, partners, visitors and other associates should consider all related actions and behavior which may compromise the rights and safeguarding of children and young people.

Personal conduct outside of work or engagement with us.

We do not dictate the belief and value systems by which staff, volunteers, partners, visitors and other associates conduct their personal lives. However, actions taken by them out of working hours that are seen to contradict this policy will be considered a violation of the policy.

Our staff, managers, volunteers and any other associates are required to adhere to principles of the policy on safeguarding children and young people globally, both at work and outside work.
Annex 2: Guidelines for implementing safeguarding in practice

These guidelines outline the requirements for safeguarding children and young people that are applicable to organizations that work with Plan International USA in carrying out our programs involving children and young people.

They are particularly applicable to organizations assessed as having contact with children and young people, working with children and young people, and/or whose projects, programs, processes, activities, advocacy and influence work impact on children and young people. Organizations funded by Plan USA are expected to build on these guidelines as appropriate based on the nature of their activities and risks to children and young people.

The guidelines illustrate our commitment to support and respect children’s and young people’s rights to be protected from harm and to provide a safe and protective environment for children and young people who are involved with any programs funded by Plan USA.

The guidelines should be applied in relation to children and/or young people as appropriate, depending on the group the organization works with.

1. Prevention: The organization must take appropriate measures to manage child and/or youth safeguarding risk factors and prevent abuse and exploitation before it occurs. Prevention measures should include organizational safeguarding policies, codes of conduct and associated procedures; the management of safeguarding risks in relation to its operations, activities and interventions; and the production and promotion of “child- and young person-friendly” safeguarding information and resources.

2. Code of ethics and conduct: The organization is required to ensure that their personnel avoid any behavior or conduct that compromises the safety and protection of children and/or young people within its activities, operations and programs. In addition, programs and activities working directly with children and/or young people or involving direct contact between the same should develop guidance on expected and acceptable behavior for children and/or young people towards each other. This should be incorporated into policy and practice documents.
3. **Gender equality and non-discrimination**: The organization should ensure that all safeguarding children and/or young people policies and procedures take into account gender equality and nondiscrimination requirements. These policies and procedures should recognize that girls, boys, young women, young men and children and young people of different gender identities may face different risks relating to their safety and protection, and that all children and young people have an equal right to protection, irrespective of: age, sex, gender, gender identity, sexual orientation, nationality, ethnicity, color, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background or class.

4. **Screening procedures**: There should be detailed screening procedures for all personnel (including unpaid volunteers) who will come into contact with children and/or young people (directly or indirectly). Screening procedures should be as available in each country and updated on a regular basis, where possible. Screening procedures may include: 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, and references who support the applicant’s suitability to work with children and/or young people.

5. **Awareness**: The organization should ensure that all personnel, sub-contractors, consultants or affiliates involved with children and young people’s programs are aware of safeguarding risks, policies, and procedures, and their safeguarding responsibilities. In addition, children and/or young people engaged and their parents, guardians or caregivers should be informed of the same so that they know what behaviors to expect and how to report any concerns.

6. **Capacity building**: The organization should develop the capacity of all who work with and for children and/or young people to appropriately prevent, detect, report and respond to safeguarding concerns, particularly as they pertain to differing gender 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 employees, volunteers and other associates.

7. **Participation of children and/or young people**: Children and/or young people should be actively, meaningfully, and ethically involved in the development of safeguarding measures in accordance with their evolving capacities. Children and/or young people must not be treated simply as objects of concern but rather listened to, taken seriously, and treated as individual people with their own views.

8. **Reporting mechanisms for children and/or young people and staff**: Mechanisms should be established that enable the safe reporting of safeguarding concerns. Such mechanisms should ensure appropriate escalation of concerns within the organization, referral to the appropriate authorities and confidentiality. In addition, child and youth reporting mechanisms should be accessible, friendly and sensitive to their differing needs.

9. **Response and follow up**: Organizational policies and procedures should include appropriate measures to support and protect children and/or young people when concerns arise. All measures taken to respond to a safeguarding concern should take into account the best interest of the child or young person 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 endeavor to ensure no further harm comes to the child and/or young person as a result of any actions taken by the organization.
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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.

The organization should also advise Plan USA of any complaints of abuse to children and/or young people in line with the working agreement.

10. Implementation, monitoring and review: The implementation and monitoring of the safeguarding children and/or young people policy for each organization should be reviewed at regular intervals as determined necessary by the organization, preferably at least every three years, where possible.

11. Sanction and discipline of organization personnel: The organization policies and procedures should provide for appropriate sanctions and disciplinary measures which ensures children and young people are protected from further potential harm. This may include the immediate suspension of personnel until such time as the allegations are either substantiated or refuted. Personnel convicted of abusing a child or young person will be immediately terminated with cause from his or her position.

12. Informed consent: The organization should provide children and/or young people (and their parent(s)/legal guardian(s) where applicable), with all necessary details (including on 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 young people (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.

13. Protection of personal information: Personal information regarding any child or children and/or young people, whether or not such information is obtained as part of the programs involving children and/or young people, 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 policies of the organization 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/or young person.

14. Working with partners: The organization should ensure adequate safeguarding assessments are made as part of its due diligence processes when it comes to partnership working. Third party entities that are contracted or supported to work with children must be subject to the same safeguarding 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 must also be subject to appropriate safeguarding measures.