

One Oxfam Youth Safeguarding Policy

TABLE OF CONTENTS

1. Policy statement	2
2. Scope and eligibility	2
3. Oxfam Youth Safeguarding principles	3
4. Roles and responsibilities	4
5. Digital safeguarding	4
6. Research with young people	4
7. Data protection.....	5
8. Safe programming	6
9. Managing risk	7
10. Support for survivors	8
11. How to raise a complaint or concern.....	8
12. Breaches of the policy.....	9
Annex 1: Definitions.....	10
Annex 2: Useful links.....	11

1. POLICY STATEMENT

At Oxfam, we believe in the inherent rights, freedom, dignity and equality of all people. Oxfam cares about and is committed to ensuring the safety, security, and well-being of the people it works with. This applies to all people we work with to implement our activities including employees, volunteers, partners and beyond. In addition to its [Protection against Sexual Exploitation and Abuse \(PSEA\) Policy](#), Oxfam employs its *Adult Safeguarding Policy (under review)* when working with adults, and its [Child Safeguarding Policy](#) when working with children (under 18 years of age).

Oxfam also works with young people as a specific group. We define young people as those aged 15-24 – while acknowledging that definitions can change between countries and cultural contexts. We work with young people as co-creators and partners in programmes, campaigns, fundraising and decision-making structures. A core feature of this approach is a shift in thinking and strategy from doing programmes for young people, to working *with* young people and supporting them to lead on efforts to overcome poverty and injustice.

This shift in the ways of working with young people has consequences for the safety, security and well-being of those young people, and of those working with young people. Oxfam needs to consider its duty of care to young people when it:

- works with partners to support youth organisations, including youth movements, volunteers and activists
- works with young researchers/ young leaders
- implements youth-led programmes/campaigns/initiatives
- works with young people in fundraising activities
- works with young people within Oxfam's decision-making structures

This document explains Oxfam's safeguarding policy position when it comes to working with young people, setting out reasonable measures Oxfam takes to mitigate reasonably conceivable risks. This policy guides Oxfam staff working with young people and sets the boundaries (minimum standards) of what Oxfam deems necessary to safeguard the well-being of the young people it works with. It also guides the responsibilities of partner organisations and young people that Oxfam engages with. Oxfam actively encourages anyone to raise a concern or make a complaint to Oxfam about something they have experienced or witnessed (see the [One Oxfam PSEA Policy](#) for the various speak up channels that are available).

2. SCOPE AND ELIGIBILITY

This policy applies to anyone associated with the delivery of Oxfam work, in all countries where we work, both during and outside normal working hours. This includes employees, consultants, trainers, volunteers, trustees, partners and other representatives working through its programmes, campaigns, fundraising and initiatives.

In countries where the following policy contravenes local legislation, local legislation must be followed with guidance from the respective (Executing) Affiliate Headquarters. Oxfam policy will apply in the event that it is more stringent than local legislation.

Oxfam representatives are always in a position of authority or power (even if Oxfam representatives themselves are under the age of 25). Therefore, when Oxfam staff and representatives are in contact with young people, they should always abide by the [Oxfam Staff Code of Conduct](#) and [Oxfam Friends Code of Conduct](#) which includes specific guidelines on how Oxfam representatives must and must not behave, which applies equally when they are in contact (physical or otherwise) with young people.

Oxfam representatives must always treat all youth participants with respect, regardless of race, gender identity, language, religion, opinions, nationality, ethnicity, (dis)ability, class, sexual orientation or other status. They should act professionally towards the youth participants that they interact with in their role, following relevant laws pertaining to working with young people. They should consider the risk of harm when engaging with or conducting activities with young people – both whether there is any possibility a youth participant may be abused or exploited through their engagement with Oxfam and in terms of political sensitivity. Oxfam representatives must always report any suspicion, allegation or witness of abuse or other breaches of the Safeguarding Policy as per the reporting procedures outlined in the [One Oxfam PSEA Policy](#).

While Oxfam is responsible for ensuring the health, safety and well-being of youth participants, and we take every reasonable precaution to manage and mitigate risks, certain parameters apply in circumstances where Oxfam has limited involvement or control on their activities. In these instances, Oxfam has a responsibility to make this clear to young people and advise them accordingly about how to proceed safely.

3. OXFAM YOUTH SAFEGUARDING PRINCIPLES

This policy aligns and complies with all One Oxfam Safeguarding Policies, including but not limited to the [PSEA Policy](#) and the [Child Safeguarding Policy](#). It should be used in conjunction with existing safeguarding and protection approaches.

Oxfam deems it important to have a youth-specific policy to address the gaps in policy when working with young people. Through their engagement with Oxfam, young people are exposed to specific risks, both offline and online. The [Child Safeguarding Policy](#) applies to young people under 18 years only, while the [PSEA Policy](#) and forthcoming *Safeguarding Adults Policy* may be too general to capture the nuances for working with young people as partners and leaders.

The policy ensures that all those working for or on behalf of Oxfam are given clear guidance about the standards of behaviour and practice required of them at all times when they are in contact with young people within or external to Oxfam.

Having a specific Youth Safeguarding policy demonstrates:

- Commitment: it shows the care and thought that has gone into working with young people and the nuanced roles that they play when working with Oxfam
- Consistency: it ensures that decisions are consistent and not made on an ad hoc basis and that all young people are treated equally and fairly
- Clarity: it allows young people to know how they can expect to be treated and where to turn to if they want to raise a concern; and ensures that all Oxfam staff, consultants, trainers, volunteers, partners, trustees and other representatives fully understand how they should treat young people.

Oxfam seeks to safeguard young people by valuing, listening to and respecting them. This policy is based on the following values: youth participation; gender equality; and empowerment.

Youth participation

Oxfam believes that youth participation entails the active, informed, voluntary and meaningful involvement of young people in decision-making that affects them and their communities. This means working in partnership *with* young people and supporting them to *lead* on efforts to overcome poverty and injustice. It also means creating space for young people to be involved in decision-making processes within our own organisation. This has consequences for the safety, security and well-being of those young people, and of those working with young people. In this light, it is essential that young

people are empowered to participate in the development of safeguarding mechanisms that apply to them.

Gender equality

Oxfam takes a transformative approach to youth-led gender justice, empowering young people to determine their own futures by taking control and taking collective action to challenge gendered power relations and discriminatory social norms, policies and behaviours. Exactly this challenging of gendered power relations can put young people – notably young women – in a situation of risk to their well-being. This is an important reason for having a specific youth safeguarding policy that is guided by the principle of gender equality.

Empowerment

The greatest and most lasting impacts on the lives of young people will be achieved if they themselves are empowered to become active citizens. This means young people – and their allies – being equipped with awareness and knowledge about their rights, having improved confidence and skills to speak up and out, and having safe spaces to come together, mobilise and to also influence decision-makers. Since speaking up could put young people in a situation of risk to their well-being, it is important to have and adhere to a specific youth safeguarding policy.

4. ROLES AND RESPONSIBILITIES

Safeguarding is everyone's responsibility and failure to act on concerns or disclosures relating to neglect, abuse or exploitation of children and young people is not an option. The [PSEA Policy](#) sets out roles and responsibilities that apply equally to the Youth Safeguarding Policy. In addition, where possible, Oxfam should **collaborate with local youth organisations and youth focused organisations** to provide youth safeguarding training and capacity building to Oxfam staff and partners of Oxfam programmes, projects, campaigns, influencing and other initiatives. **Partner organisations and non-partner organisations** involved in Oxfam's work with young people have a responsibility to safeguard the young people that they engage with, and must adhere to this safeguarding policy. **Youth leaders** involved in Oxfam's work are a particular category: not only do they need to understand safeguarding for themselves, they also have a responsibility towards their peers whom they are interacting with to take safeguarding seriously and act upon the contents of this policy.

The Head of Employee Relations Global Shared Service and Head of Oxfam International's Safeguarding Team are responsible for reviewing and updating this Policy annually, in line with legislative and organisational developments and hold overall accountability for Oxfam's Safeguarding work.

5. DIGITAL SAFEGUARDING

Anyone working with or on behalf of Oxfam must adhere to Oxfam's *Digital Safeguarding Policy (to be approved shortly)* to protect young people engaging with Oxfam through social media or other digital platforms. The use of social media in youth work presents many opportunities to engage with young people where they are interacting with others, sharing information and seeking advice and guidance. This may also present some challenges and risks that need to be managed. It is the responsibility of managers to consider the full range of risks and safeguards required to protect young people in the activities that they oversee.

6. RESEARCH WITH YOUNG PEOPLE

Research with young people and children must be well thought through and special care and attention must be taken to the following guidelines:

- If research of any type involves young people under 18 years old then – in addition to informed consent from the young people themselves – informed consent of a parent/guardian must be obtained before the research is conducted. This consent must be recorded, specifying their name

and relationship with the young person. If only verbal consent is possible (e.g. by telephone) then a written confirmation must be sent through to the corresponding adult.

- Young people, including those under 18 and their parents/guardians, must receive sufficient information about the nature and aims of the research, prior to consent being sought.
- Even when parents/guardians give their (written) consent, young people must have the right to refuse to take part. This option must be made clear to them. Research can only be conducted when young people themselves have given consent.
- Great care must be taken so that no material covered or discussed during research would harm, or adversely affect a respondent. Topics which may cause upset, relate to politically sensitive areas or risk causing tension between the respondent and their family or community must be handled very carefully in order to avoid these potential consequences.
- Where material could prompt distress or cause harm, staff must contact their affiliate's Data Protection Officer or Focal Point for further guidance. It may in these circumstances be necessary to obtain further privacy advice or carry out a Privacy Impact Assessment to ensure appropriate, structured mitigations are identified for these consequences.
- Participants will either be anonymised or if there is a specific reason they are being identified in the research, this will be made clear to them and specific consent for this will be requested.
- Additional care should be taken so that any data collected and analysis produced does not cause any harm or adversely affect any of the respondents.
- Questions must not be asked which involve young people giving personal information about others. We refer to Oxfam's [Common Approach to MEL and Social Accountability](#) for further guidance on data collection.
- Young people must be reminded of their right to withhold information for any particular questions.
- Any incentives offered must be carefully selected. Preferential treatment and inappropriate gifts must be avoided.
- Staff involved in research with young people should be aware of how to respond appropriately to harm, abuse, exploitation and neglect. Disclosure of abuse should never be communicated to evaluators and researchers. Managers should be alerted to this.

7. DATA PROTECTION

Oxfam staff must adhere to [Oxfam International's Data Protection Policy](#), and the relevant Oxfam affiliate's Data Protection Policy. In the case of program data, they must also adhere to Oxfam's [Responsible Program Data Policy](#). All information stored by Oxfam about children and young people must be processed in accordance with these policies which may reflect applicable national or regional laws, such as the [General Data Protection Regulation \(GDPR\) in the European Union](#) (2018).

Personal data incorrectly handled could be used to facilitate abuse or exploitation. To the extent possible, personal information on young people should never be used in ways which allow the young person to be identified (e.g. publicity material must not give a young person's full name and address).

In circumstances where any risk exists to individuals – for instance, if surveys may prompt distress, or if data could expose individuals to risk of harm or impact on other rights and freedoms – it is crucial to seek specialist advice and carry out a Privacy Impact Assessment to understand and mitigate this harm. Please refer to specific guidance on how to carry out this assessment from the relevant Oxfam affiliate.

7.1. Use of Images & Recordings

Oxfam has a duty of care to protect young people, even if they are willing to participate and voice their opinions. Any image or recorded case history of a young person must not place them at risk or render them vulnerable to any form of abuse or exploitation.

- In most cases, a young person’s story can be told through application of our existing guidelines on informed consent (see Oxfam’s *Digital Safeguarding Policy (approval under process)* and [Ethical Content Collection Guidelines](#)); however, there are some key areas where Oxfam needs to be extremely alert and sensitive to youth safeguarding issues. Areas where Oxfam needs to be aware that young people are more at risk and may be (re)traumatized include:
 - o Emergency situations – vulnerable, traumatised or orphaned
 - o Conflict situations – as above and combatants
 - o Abuse – survivor of any form of abuse
 - o Crime – perpetrated or survived a crime
- In all cases, images and recordings of young people under the age of 18 should not be accompanied by identifying information (e.g. the child’s real name). Images and recordings of young people over the age of 18 should as a rule only include first names and not surnames, and should only be done after discussion with and with the informed [consent](#) from young people themselves. For children, Oxfam must seek informed consent from a parent or guardian, in addition to attaining informed assent from the child, where they are old enough to understand.
- Parents, guardians, young people over the age of 18 (and where possible young people under the age of 18, i.e. children) must be given enough context to make this context ‘informed’. In particular, they must be able to reasonably understand how their image or likeness may be used, and what the potential consequences may be.
- A story-gatherer (interviewer, photographer or video-maker) should exercise judgement and creative skills to tell a powerful story in a way that doesn’t reveal a young person’s identity when they are under 18, or when this may put them at risk due to e.g. political or religious contexts.
- Young people retain the right to remove any pictures or stories about them from public view at any stage and should be made aware of this.
- There must be a practical means for parents, guardians, young people over the age of 18 (and where possible young people under the age of 18, i.e. children) to contact Oxfam to allow them to assert this right.
- Sign off procedures are clear, with appropriate levels of sign off authority applied to content gathering and creative execution phases.
- Oxfam takes responsibility for its own platforms and where media and images are hosted, but cannot take responsibility if it appears elsewhere.
- More information about gathering content, protecting identity, sharing content, implementation and how to achieve informed consent for children and young people can be found in Oxfam’s [Ethical Content Collection Guidelines](#), [Child Safeguarding Policy](#) and *Safeguarding Toolkit (under development)*.

8. SAFE PROGRAMMING

8.1. Recruitment

In compliance with applicable laws, Oxfam is committed to prevent perpetrators of sexual harassment and sexual exploitation and abuse from being (re)hired or (re)deployed. Managers and Human Resource teams will ensure robust recruitment screening processes for all personnel, including employees, volunteers, consultants and other representatives. As part of this, all application forms, interviews and references must address Safeguarding and equality requirements and attitudes.

Recruitment for all applicants to roles which involve having contact with youth participants must follow the following guidance:

- The recruitment processes should explore a candidate’s motivation for and attitudes towards working with young people, as well as their understanding of youth safeguarding principles;
- Legitimate registers must be checked to establish whether applicants are a known risk to young people;

- Any reference check, undertaken by HR teams using agreed affiliate protocols, must ask explicitly about suitability to work with young people, and any concerns in this area.

8.2. Induction and training

Oxfam staff, volunteers, partners and representatives working with young people, as well as youth participants themselves, should receive a proper induction to Oxfam's youth safeguarding policies and guidelines, and should agree to adhere to these policies and guidelines.

Specifically, they are eligible to receive *training on the forthcoming youth safeguarding policy and guidelines* commensurate with their role. This training will be carried out by specialists on a regular basis and will include information about Oxfam's policy positions, reporting and investigation procedures and how to embed Youth Safeguarding in Oxfam's work.

Overall responsibility for ensuring that staff and youth participants receive regular training and messages about Safeguarding lies with the country team or Executing Affiliate's Safeguarding Focal Point.

8.3. Code of Conduct

Oxfam employees adhere to a Confederation wide organisational [Oxfam Staff Code of Conduct](#), while partners, representatives, supporters, volunteers, project participants, beneficiaries and all those working with Oxfam must adhere to the [Oxfam Friends Code of Conduct](#). Youth participants in dialogue with Oxfam staff should agree on principles and parameters concerning desired conduct and behaviour, contextualised to the environment and activity they are engaged in, but accepting non-negotiable minimum standards and values as set out in this policy.

9. MANAGING RISK

9.1. Participatory, gender-sensitive and contextualised risk assessment and analysis

Effective contextual analysis is essential to identify potential risks when working with young people. It is important that young people have the opportunity to participate in and contribute to risk assessments concerning the activities in which they will be involved. The social, cultural and political context should be taken into consideration, as well as the individual situation of the young people engaging with Oxfam. Oxfam can offer support and guidelines on gender-sensitive and participatory risk assessment. Assessed risks, potential consequences for youth engagement, and mitigation strategies should be discussed with young people before programme activities begin. We refer to the *Safeguarding Toolkit (under development)* for further guidance on how this could be done.

9.2. Restrictions

The extent of the risks identified in the risk assessment will determine whether Oxfam should restrict the activities of young people. Young people should not be involved in Oxfam supported activities if:

- They are of compulsory school age and this would harm school attendance or academic performance
- It is deemed to put them at risk of violence (e.g. gender-based violence, political violence)
- It is deemed to put them at risk of non-physical abuse such as socio-cultural marginalisation
- It is beyond their physical or psychological capacity (e.g. heavy lifting)
- It involves a risk to their health from extreme temperature, noise or vibration
- It exposes them to substances harmful to human health (e.g. toxic substances)
- It involves risk of accidents which they are unlikely to recognise (e.g. due to lack of previous experience)
- Any other restriction specific to local legislation

9.3. Campaigns and Advocacy Work

Oxfam should ensure that young people are well informed about and fully understand the potential complexity and risks of campaign/advocacy activities they are taking part in. Oxfam should ensure that youth participants actively contribute to the design of campaign and advocacy activities in which they take part, as opposed to taking on an instrumental approach of using youth participants for campaigning/advocacy purposes. Oxfam staff will ensure youth participants make a realistic evaluation of potential risks associated with campaigns and advocacy work, and help them plan appropriate response and mitigation strategies.

Campaigns and advocacy work with young people and children must be well thought through and special care and attention must be taken to the following policy rules:

- Young people must be given a clear option *not* to join in with campaigns or advocacy activities if they do not want to. This choice must be made clear to them by the adults working with them and presented to them in a way in which they are not made to feel guilty for not joining in (even if their peers choose to do so).
- If campaigns and advocacy work of any type involves young people under 18 years old then consent of a parent/guardian must be obtained before the activity is conducted. This consent must be recorded, specifying their name and relationship with the young person. If only verbal consent is possible (e.g. by telephone) then a written confirmation must be sent through to the corresponding adult.
- Young people, including those under 18 and their parents/guardians, must receive sufficient information about the nature and aims of the activity, prior to consent being sought.
- Even when (written) consent is obtained from parents/guardians, young people must have the right to refuse to take part. This option must be made clear to them.
- Great care must be taken so that the campaigns and advocacy work would not harm, or adversely affect a respondent. Topics which may cause upset, relate to politically sensitive areas or risk causing tension between the youth participant and their family or community must be handled very carefully in order to avoid these potential consequences.

10. SUPPORT FOR SURVIVORS

Safeguarding teams will offer support to youth participants who have suffered harm, abuse or exploitation, regardless of whether a formal internal response is carried out (such as an internal investigation). Support can include psycho-social counselling, access to Oxfam's Employee Assistance Programmes (where available) and/or access to other appropriate support as needed. Youth participants can choose if and when they would like to take up the support options available to them. More details can be found in the *Survivor Support Guidelines (under review)*. Oxfam will strive to provide support that is sensitive to the youth participant's needs and seek it out wherever available elsewhere.

11. HOW TO RAISE A COMPLAINT OR CONCERN

We actively encourage anyone (including Oxfam's beneficiaries) to raise a concern or make a complaint to Oxfam about something they have experienced or witnessed without fear of retribution. You can do this verbally or in writing to your country team or Executing/Home Affiliate's Safeguarding Focal Point, Safeguarding Team or using the whistleblowing helpline service. Employees can also choose to raise concerns with their Line Manager or Human Resources team member. All available reporting procedures are detailed in the Speak-Up Channels included in the PSEA Policy.

The [PSEA Policy](#) sets out more details on raising complaints or concerns, including: reporting channels; confidentiality; retaliation against complainants, survivors and witnesses; complaints about Oxfam's partners; and receiving complaints about external organisations/bodies.

Oxfam recognises that disclosures and suspicion should always be acted upon swiftly, and if there is an urgent safeguarding situation, for example if a project participant is in imminent danger of abuse, then immediate protective action must be taken.

12. BREACHES OF THE YOUTH SAFEGUARDING POLICY

Breaches of the Policy will not be tolerated and may result in disciplinary procedures, change of duties, termination of employment or relationship, and possible legal proceedings, for Oxfam staff, contractors, volunteers or people working in Oxfam's name.

Oxfam will take action against anyone, whether they are the subject of a complaint or not, who seeks to or carries out retaliatory action (such as, but not limited to, harassment, intimidation, unfair disciplinary action or victimisation) against complainants, survivors or other witnesses. Employees who are found to do this will be subject to disciplinary action, up to and including termination of employment. Others who work with Oxfam may have their relationship with Oxfam terminated.

If an Oxfam employee is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment. Others who work on behalf of Oxfam will be subject to action that may result in the termination of their relationship with Oxfam.

Further information about the process of investigations and outcomes can be found in the *Safeguarding Case Management Standard Operating Procedures* (forthcoming).

ANNEX 1: DEFINITIONS

Safeguarding Children and Child Protection

The policies, procedures and practices employed to safeguard children who come into contact with Oxfam and all those associated with the delivery of our work from all forms of harm, abuse or exploitation and the responsibility of all personnel to embed these at the activity level to ensure Oxfam is a child safe organisation.

‘Child protection’ is the prevention of and response to significant harm, abuse, neglect, exploitation and violence against children. Child Protection programming is an activity or initiative designed to protect children from all forms of violence. This includes the integration of child protection into all thematic areas of programming to enhance the protective environments for children in the community.

Child

A child is defined as any person under the age of eighteen (18) years as defined by the Convention on the Rights of the Child.

This definition is recognised internationally as identifying a population who are particularly vulnerable and require additional safeguards to protect their rights.

The definition of a child for the purposes of Safeguarding and Child Protection should not be confused with the legal definition of a child or age limits set out in other relevant laws. The fact that a young person under the age of 18 may have reached the age of e.g. sexual consent, voting age etc. does not alter their inherent vulnerability as a child.

Young People/ Youth

Oxfam defines a young person as being between the ages of 15 and 24, in line with the UN definition. However, we recognise that definitions change between countries and cultural contexts – the African Youth Charter, for example, defines young people as those between the ages of 15 and 35. When using the term youth or young people, we recognise that young people are not a homogeneous group and experience different levels of privilege and marginalisation that should be taken into account. For the purpose of this policy, we use Oxfam’s definition of ages 15-24. Beyond this age group, Oxfam’s *Safeguarding Adults Policy (under review)* applies.

Young people between the age of 15-18 are considered as children, and Oxfam’s [Child Safeguarding Policy](#) applies to them, in conjunction with this Youth Safeguarding Policy.

Youth participant

A youth participant is a young person who engages with Oxfam through its programmes, campaigns, fundraising or initiatives.

Safeguarding Young People

The process of protecting the health, well-being and human rights of young people, which allows them to live free from abuse, harm and neglect, and enables them to enter adulthood successfully.

For other definitions (including but not limited to sexual harassment and sexual exploitation and abuse, please refer to the [One Oxfam PSEA Policy](#).

ANNEX 2: USEFUL LINKS

Guidelines and training packs

- Youth Safeguarding training pack
- Safeguarding Toolkit (under development)
- Child Protection Communication Guidelines
- Digital Safeguarding Guidelines for Youth Programming
- [Common Approach to MEL and Social Accountability](#)
- Data Rights Compass Site (under development)
- [Ethical Content Collection Guidelines](#)

Related safeguarding policies

- [Child Safeguarding Policy](#)
- [Protection against Sexual Exploitation and Abuse \(PSEA\) Policy](#)
- Safeguarding Adults Policy (under review)
- Survivor Support Policy (under review)
- Digital Safeguarding Policy (under review)