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1. Introduction & Purpose:

SolidarityNow (SN) is committed to conducting its programming and operations in a way that safeguards and promotes the well-being of all children with whom it comes in contact, either directly or indirectly. Any activity that results or may result in any kind of harm and/or abuse of children is strictly prohibited. SN implements a zero-tolerance policy towards any form of ill treatment of its programme beneficiaries, especially children, by those working for or with it, and retains the right to take all necessary steps in cases of violations. The present document describes policies and relevant procedures that regulate the organizations’ operations, so that no harm is caused to children, regardless of gender, race, country of origin or religious belief.

“Child Safeguarding” is the responsibility that organizations 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 organization has about children’s safety within the communities in which they work are reported to the competent authorities.\(^1\)

This includes both preventative actions to minimize the chances of harm occurring, as well as responsive actions to ensure that incidents which may happen are appropriately handled and reported.

The “do no harm principle” refers to organizations’ responsibility to minimize the harm they might be doing inadvertently as a result of their organizational activities.\(^2\)

2. Definitions:

**Child:** Anyone under 18 years of age\(^3\)

**Abuse or maltreatment:** refers to 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.

**Physical abuse:** The intentional use of physical force against a child that results in – or has a high likelihood of resulting in – harm for the child’s health, survival, development or dignity. It may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in, a child.

**Emotional abuse:** includes the failure of a caregiver to provide an appropriate and supportive environment, as well as acts that have an adverse effect on the emotional health and development of a child. Such acts include restricting a child’s movements, denigration, ridicule, threats and intimidation, discrimination, rejection and other

\(^1\) Safeguarding Standards and how to implement them, Keeping Children Safe Coalition, p.3
\(^2\) Ibid.
\(^3\) In accordance with national law and in alignment with United Nations Convention on the Rights of the Child definition of a child.
non-physical forms of hostile treatment.

**Sexual Abuse & Exploitation:** child sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society. Child sexual abuse is evidenced by this activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person. This may include but is not limited to: the inducement or coercion of a child to engage in any unlawful sexual activity, the exploitative use of a child in prostitution or other unlawful sexual practices, the exploitative use of children in pornographic performance and materials. Child sexual abuse also includes threats and exposure to pornography.

**Neglect**⁴: refers to the failure of a parent to provide for the development of the child – where the parent is in a position to do so – in one or more of the following areas: health, education, emotional development, nutrition, shelter and safe living conditions. Neglect is thus distinguished from circumstances of poverty in that neglect can occur only in cases where reasonable resources are available to the family or caregiver.

**3. Sources of Violence and/or Abuse that children may experience:**

The following examples, which are indicative and by no means exhaustive, are only meant to be used as a guidance:

- **Oneself, Self-harm:** deliberately cutting or harming oneself, suicidal thoughts, attempted and actual suicide.

- **Peer abuse:** bullying (physical and/or psychological), physical and sexual abuse, gang violence.

- **Abuse by adults:** physical, psychological, sexual, neglect. The abusers may be the parents or primary caregivers, staff members of the organization, volunteers, external partners.

Children may also be subjected to other types of external abuse, such as societal abuse or abuse of authority. This policy focuses on the intentional or unintentional harm, which can occur within SolidarityNow, its operations and/or programme implementation. Any external abuse provisioned by the national legal framework will be reported accordingly.

**4. How to implement Child Safeguarding:**

Child Safeguarding must be integrated in all aspects of organizational work, including recruitment, management, behaviour of staff and physical environment of facilities. While oversight of children at all times may not be feasibly possible, SN is committed

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to do everything in its power and within its scope of work to ensure that children are safeguarded and that no harm is caused by its programmes implementation or other organizational activities. However, this commitment does not in any way denounce the responsibility of parents and other legally appointed guardians towards the children assigned to their care.

As regards SN Centres operating on an open-door policy (e.g. BRC, SC, Community Centres) where UAMs might turn up as drop in clients, staff members are required to follow relevant national procedures, always having as their guiding principle the best interest of the child and in cooperation with EKKA and other stakeholders where needed.

5. Child Safeguarding - Prevention:

A. Human Resources

The Safeguarding Policy applies to all those working for, with and/or on behalf of SN. This includes Board members, senior management, staff members, external consultants or advisors, interns and standing volunteers, regardless of their contractual relationship with the organization (full or part time, paid or unpaid). The Safeguarding Policy complements the SN Code of Conduct and together they specify what constitutes acceptable behaviour and what is not.

Safer Recruitment, Selection & Appointment procedures:

i. A clear statement about SN’s commitment to safeguarding children should be included in all job vacancies advertised. Indicative phrasing as follows:

“Recruitment processes reflect SN’s commitment to keeping children safe from harm and abuse. Employment is subject to SN Child protection standards, including background checks and adherence to SN Child Safeguarding Policy”.

ii. Child safeguarding level should be clearly stated in job vacancies and in accordance with the following classification:

| Level 1 | the job holder does not have contact with children |
| Level 2 | the job holder will have sporadic contact with children |
| Level 3 | the job holder will have regular contact with children |

**Level 1** corresponds to HQ staff that do not have on-site exposure, thus no contact with children in their line of work, such as staff members and any standing volunteers or interns assigned to the following departments: HQ Legal, Finances, Human Resources, Operations, Advocacy.

**Level 2** applies to HQ staff that might have sporadic contact with children, as part of performing their tasks. Indicative tasks of this kind include: monitoring & evaluation visits, mapping, needs/gaps assessments, interviews and content development. Staff members and any volunteers or interns assigned to the following departments are
classified as Level 2 personnel: Programmes, Communications. Senior management is also classified as Level 2, given that they might wish to conduct ad hoc on-site visits, as part of their overall oversight mandate.

**Level 3** corresponds to staff members with on-site presence and regular contact with beneficiaries. Social workers, psychologists, all staff members involved in services provision are classified as level 3 personnel.

SN retains the right to modify classification levels upon significant changes in its organigram, strategic priorities and/or its current project management cycle.

iii. Prospective Level 2 and Level 3 personnel should be asked specific questions in relation to child safeguarding during the recruitment process. These questions will aim at better understanding the candidate’s ability to identify and handle risks most commonly associated when working with children.

Level 2 and Level 3 personnel will be requested to submit a criminal record certificate upon job offer. Any criminal offence that triggers concerns for children safety constitutes a valid reason for the organization to withdraw its job offer. Issuance of criminal record certificates take approximately 2-3 weeks. If, due to the urgency of the assignment, work has already commenced and until background check is completed, the respective employee should not work unsupervised or alone with children. This responsibility lies with the direct supervisor in accordance with the employee’s reporting line.

iv. Records of safer recruitment policies, such as criminal records, references etc should be kept in HR files. Information of this kind should be stored and kept in accordance with applicable, data protection laws and regulations.

v. All new employees must be properly informed about their obligation to comply with SN Code of Conduct, as well as the present Child Safeguarding Policy during their induction week (first week of employment). All new employees must sign the relevant acknowledgement form. Any question or request for clarification by the employee that is not addressed in the present document should be directed to HR dept. HR dept. is responsible to ensure that all employees have signed and returned the acknowledgment forms. Indicative change in form phrasing: “I acknowledge receipt of the SN Employee Handbook, Code of Conduct & Child Safeguarding Policy”.

vi. All staff members and standing volunteers will be given the opportunity to be regularly updated or reminded of child safeguarding policies and procedures, either
formally, through relevant trainings and capacity building activities, or informally through team meetings and discussions with supervisors.

A copy of the Child Safeguarding policy should be made available and easily accessible to all staff members.

B. Programmes Dept.

SN programmes and projects, along with their respective activities must take into consideration any potential risk of harm towards children at all stages, from initial programme/project design to implementation and evaluation phase.

i. Once such risks have been identified, mitigation strategies to minimize the risk of harm should be put in place. Mitigation strategies must include mitigation goals, actions, as well as an action plan for implementation. All of the above must be outlined in all proposals prior to submission.

ii. Child safeguarding policies, their existence or lack thereof, should be taken into consideration for partners identification purposes. When reaching out to partners, particularly for proposal development and potential future collaboration in projects that entail direct contact with children, the project manager in charge needs to assess whether the partner in question is in alignment with SN Child Safeguarding Policy and overall philosophy as regards child protection.

iii. All staff members involved in programme/project implementation and service provision must have gone through the safer recruitment procedures.

iv. Given the humanitarian nature of our work, SN is often called to work where the most needs arise; hence, not always under the most suitable conditions. Within this limitation, location and/or facilities should be carefully assessed prior to the implementation of activities, as it should not expose children to risks. SN should advocate for operations areas to be clear from obstacles that may cause physical harm (e.g. debris, environmental hazards), protected (e.g. should not have direct access to highways), well-lit and such that they do not expose children to the risk of abuse or exploitation (e.g. remote areas, areas hidden from sight due to natural elements, such as trees etc). In cases that relevant risks have been identified, mitigation strategies should be put in place. If the identified risks are too many and cannot be reduced to an acceptable level, SN must weigh the foreseeable benefits for its beneficiaries, including children, against the risks and if so needed can decide to not move forward with the respective activities.

v. All designed and implemented activities should be age-appropriate and safe for children.

vi. Parental Consent Form (or that of a legally appointed guardian) must be obtained in written and in a language understood by the guardian, prior to conducting activities that require children’s participation.
vii. Staff members must follow the two-adult rule, should work in pairs, unless the nature of the work and/or the best interest of the child requires not doing so. In cases of justified exemptions (ex. individual session with psychologist with parent’s consent), other equivalent measures must be taken. Such measures include but are not limited to providing our services in the designated for this purpose working area and within office hours, with other adults in close proximity. Any further exception to that requires approval from the Senior psychologist (PU), if it refers to a psychologist or the Protection Services Coordinator if it refers to any other service. The respective team leader for the BD hubs and the Social Welfare Coordinator for SC bear similar responsibility to grant or deny permission. Any concern of violation should be reported by the Protection Unit to the Programme Coordinator, who in turn needs to report to the HR manager and the Managing Director, if deemed necessary.

viii. If transportation of a child is needed for service provision, the child must be accompanied by his/her legal guardian. If no legal guardian is assigned, staff members will accompany in pairs and always with a SN vehicle or public transportation. Staff members are not allowed to transport children beneficiaries with their own means of transportation. Emergencies or life-threatening situations, if there is no other alternative, constitute justified exceptions.

ix. Any service provision and/or activity that provides internet access should not expose children to risk of harm and abuse, such as online grooming$^5$ or exposure to pornography. Access to age-inappropriate content should be denied and protective filters should be placed in advance. Relevant IT equipment to which children have access must be placed in a public area, where it can be supervised by adults.

x. Child protection policies and procedures will be subject to regular monitoring and evaluation to ensure proper actions are taken, to properly document any issues or concern and to channel lessons learned back into programming, either for better future design or for re-calibration of existing activities.

C. Media & Communications

Child safeguarding is included in all SN media activities and communication materials.

i. All staff members, associates, standing volunteers and interns must ensure that the safety of children will not be in any way compromised by disseminating or publishing images, videos and/or content of them.

ii. Children’s right to privacy should be respected at all times. No image, video or any other type of content should be disseminated or published unless the parent, legal guardian or the person responsible for the child provides explicit permission to do so. The objective and use of content must be explained to the guardian in advance, in a

$^5$ Grooming: building an emotional connection with a child in order to gain trust for the purposes of sexual abuse, sexual exploitation or trafficking. Indicative example of online grooming: sending an inappropriate photo of oneself to a child, prior to requesting a similar one from the child.
language that he/she can understand. Children have the right to refuse taking part, even if the responsible adult consents.⁶

iii. All media content must respect children’s dignity.

iv. Communications department is responsible to proceed with arrangements so that media professionals reporting on SN work are aware of and in agreement to abide by the SN Child Safeguarding Policy. In the event of violations that cannot be handled by the department, the Head of Communications will report to the Head of Legal, Ethics & Governance Dept. In case of violation, SN has the right to take all appropriate means against such violations, not excluding bringing such action(s) to the competent courts. Safeguarding its children-beneficiaries’ rights, as well as protecting SN’s integrity and reputation as a service provider shall remain of main importance.

v. Any request for media content development that includes children being photographed, videotaped or interviewed should be directed to the Communications Department, which is the responsible department to grant or deny permission. In the event of unexpected on-site, ad hoc visits by media professionals, SN project managers/coordinators are responsible to notify the Communications department immediately.

vi. When children beneficiaries are being engaged in media content development by external actors (e.g. journalists, photographers, any type of content for conventional media, such as newspapers or new media outlets, such as blogs etc) and apart from their guardian, they should also be accompanied by an SN employee, who will ensure procedures are being followed, unless the guardian refuses the escort.

vii. For any content development for which SN has not been notified (e.g. an interview request addressed directly to a beneficiary residing in an independent living structure) the parent or legal guardian bears responsibility for the protection of children under his/her care.

viii. Taking into consideration child protection risks when they so arise, media or communication material should not include information that could be used in order to identify children depicted or their location. Such information includes children’s full name, their address or any either easily identifiable sign that could be used to locate them.

ix. Metadata and geolocation must always be turned off. Geolocation tagging is prohibited. Attention should be paid when creating content with “smart” devices, as in many of them geolocation is turned on by default.

SN retains the right to request by its staff, associates, standing volunteers and interns

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⁶ In accordance with Article 12 of the UN Convention on the rights of the child (UNCRC) and Article 24 of the Charter of Fundamental Rights of the European Union that both provision the right of all children to be heard and have their views taken seriously in accordance with their age and maturity.
to take down content that violates its child safeguarding policy and exposes children to risks.

x. Do not take, in any way disseminate or publish images in which children are naked, dressed inappropriately or pose in any inappropriate manner, e.g. sexual connotations.

xii. To avoid conflict, staff, associates, standing volunteers and visitors are strongly encouraged to share content published on official SN website or social media accounts (Facebook, Instagram, Twitter, LinkedIn, YouTube, Vimeo). By doing so, officially approved content is widely distributed via personal social media accounts.

D. Site Visits

Child Safeguarding procedures apply to all SN visitors. Visitors may be donors, partners, board members, policy makers, government representatives, vendors, volunteers etc. The list is indicative and by no means exhaustive.7

Every effort should be made so that any on-site visit and contact with children be expected and authorized. Visitors should be informed in advance that they are required to respect SN policies on child protection. The person responsible to ensure that is the one making arrangements for the visit.

Visits may take place on an ad-hoc basis, on a short notice and/or unexpectedly. Should this be the case and if contact with children is envisioned as part of the visit, visitors should be, at the very least, informed that they are required to abide by the following rules:

- Always respect the children’s right to privacy and their dignity.
- Any conduct that exposes children to risks or may result in harming a child is strictly forbidden.
- Any conduct that violates national law on child protection is strictly forbidden.
- Adhere to the two-adult rule at all times. Children must never be left alone with visitor(s).
- Children’s full names or locations are not to be shared on social media. Always turn off geolocation services when uploading content.
- Explicit parental permission (or that of a legal guardian) is required to produce media content depicting children (images, videos etc).

6. Staff behaviour

Staff overall behaviour, both within and outside work hours, must be in alignment with SN philosophy and values. Child protection responsibilities are shared by all, regardless of position or mandate.

Staff members working with children must take necessary steps not to put themselves

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7 For media professionals seek relevant guidance on section C.
in a compromising position or at risk of being accused of inappropriate behaviour. The two-adult rule must be followed, unless an exception can be justified due to the nature of the work or the child’s best interest (see section B/vii).

Always work in an open environment or in the designated for your work areas when with children. Avoid being alone with children in remote or out of sight areas.

Staff members must avoid age-inappropriate language with children, as well as any inappropriate body contact. Professional boundaries should always be respected. Reasonable exceptions apply. For instance, if a member of staff is hugged by a child or wishes to praise/comfort a child with a hug, this must always be done in a public, open space area, where both sides understand the reason for the hug and have given their permission.

7. Child Safeguarding – Response:

i. SN takes every allegation of a violation of its Child Safeguarding Policy seriously. All concerns and reports, regardless of the source, will be taken seriously. Anyone raising concerns or reporting an incident will be treated with respect and discretion.

ii. All potential, actual or suspected concerns must be reported within 24 hours. In cases of imminent danger for the safety of the child, the report must be submitted immediately.

iii. Confidentiality is of utmost important when concerns are raised, or reports are made. However, promises should not be given, as confidentiality is not absolute. Information will be shared strictly on a need-to-know basis and as necessary in order to ensure that the child is safe, and that appropriate assistance is provided.

iv. The reporting source can be indicatively any of the following: staff members, associates, volunteers, external partners, family/community members, children themselves. Concerns may be raised orally, in written or via the Concern Response & Feedback Mechanism (CRFM), the respective email address being: complaints@solidaritynow.org. In accordance with Article 2, paragraph 4 of the CRFM, concerns and incidents covered by the present document constitute serious complaints.

v. Concerns/Reports may relate to potential, suspected or actual abuse of a child by:

a. his/her family/extended family/community;

b. a member of SN staff, standing volunteer or SN visitor;

c. representative of a significant stakeholder, such as donors or other INGOs/NGOs.

Reporting concerns that fall under category [a]:

Any concern of this type should be reported to the Protection Unit (Protection Services Coordinator and Senior Psychologist), which has overall responsibility to ensuring the
protection of SN beneficiaries. An incident report form must be filed in. If the concern/incident is disclosed to one of the social workers/psychologists within the context of service provision, then he/she must report it to the Protection Service Coordinator. If the report refers to a child-beneficiary or a child visitor of Solidarity Centres, then it should be directed to the respective Social Welfare Coordinator. If a child reports his/her abuse directly, every effort will be made so that the bond of trust with the person of first disclosure will not be broken, however case management coordination lies with the Protection Services Coordinator and the Senior Psychologist on behalf of the PU or the Social Welfare Coordinator.

If the concern is received via the CRFM and in accordance with Article 2, paragraph 1 of the CRFM, the Protection Services Coordinator or the respective Social Welfare Coordinator will be part of the Complaints Handling Committee.

Reporting procedures as provisioned by the Greek legal framework will be followed. Any case of child abuse must be reported to the competent authorities. All case management decisions will be based on ensuring the safety of the child and his/her best interest.

Reporting concerns that fall under category [b] & [c]:

Concerns/reports of this nature can come from a child directly. All staff members-recipients of such information have the responsibility to report. Staff directly involved in service provision will report in accordance with article vi, as described below. HQ staff and all other staff must report to their direct supervisor. If their direct supervisor is somehow involved in the violation or if they feel that for some reason they cannot raise the concern with him/her, then the report should be addressed to the Human Resources Department directly.

All cases where there is a potential, actual or suspected violation of the present Child Safeguarding Policy or/and SN Code of Conduct by a member of staff or standing volunteer, are to be reported to the HR department.

The HR Manager will consult with the Head of Legal, Ethics & Governance dept. and will provide the Managing Director with a recommended course of action. Gross misconduct and relevant violations of SN Child Safeguarding Policy or/and its Code of Conduct qualify for justified termination of employment.

In cases where concerns were raised/reports made against an employee of a significant stakeholder, such as a donor or another (I)NGO, the respective Programme Coordinator and/or the Head of Programmes must be informed. She/he is responsible to notify the stakeholder about the allegation, so that the stakeholder will initiate an internal investigation procedure. She/he will also request assurances that all appropriate measures have been taken for safer recruitment procedures on the stakeholder’s behalf.

vi. In cases where concerns are raised by SN staff about other SN staff, providing that there is no malicious intent, no punitive action will be taken against the person raising
the concern or making the report. SN, in accordance with its zero-tolerance policy about abuse and exploitation, implements a whistle-blowing policy that allows all staff members to safely raise their concerns or report child protection incidents in confidentiality. For this reason, staff members are provided with an alternative as described above, if for some reason they do not feel safe to report to their immediate supervisor or if the supervisor might somehow be involved in the reported violation. Staff members on the other hand assume responsibility to always raise concerns/report incidents in good faith, with no malicious intent and with no other objective than to ensure children are safeguarded from risks, harm and abuse.

vii. In cases where concerns are raised against the Managing Director or a Board Member, they should be directed to the HR Manager, who in turn must consult with the Head of Legal, Ethics and Governance and proceed with appropriate actions.

viii. In cases where the allegations could potentially result in serious reputational damages for SN, the Head of Communications Dept. must also be consulted, the minute such risks have been identified at senior management level.

Data Storage

All personnel involved in data collection in relation to potential, actual or suspected violations of SN Child Safeguarding Policy must ensure following appropriate procedures for relevant data storage. All information should be kept strictly confidential and secured, while access to it should only be granted on a need-to-know basis. The same principle applies to any online database SN might choose to use.

8. Accountability, M & E & Review of the present policy

All SN staff and everyone working with or on behalf of SN has a responsibility to ensure that children are safeguarded from any kind of harm or abuse. All concerns should be reported in accordance with procedures outlined in this document and no person should ever work under the assumption that someone else is responsible to report.

All SN staff and everyone working with or on behalf of SN remain at all times accountable, first and foremost towards SN beneficiaries and children in particular, whom the organization is committed to protect, donors and the Greek society, within which SN operates. SN philosophy and values must be always reflected in practice.

The present policy will be reviewed as often as required, in order to remain relevant to context and reflect any significant change that may take place in relation to SN strategic priorities or project/programme management cycle.