SolidarityNow
Child Safeguarding Policy

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December 2022
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<tr>
<th>Internal document reference number</th>
<th>SNCP 01/SEP17</th>
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<td>Title of policy</td>
<td>Child Safeguarding Policy</td>
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| Category                          | SolidarityNow Internal Policies  
                                      Child Safeguarding |
| Description                       | Policy and relevant processes defining SolidarityNow’s commitment to safeguarding children from exposure to any form of abuse |
| Target audience                   | SolidarityNow staff  
                                      Members of the Board of Directors  
                                      Partners, Collaborators & Suppliers  
                                      Interns & Volunteers |
| Alignment obligation              | Mandatory  
                                      The Child Safeguarding Policy complements the SN Code of Conduct, which is mandatory for all. |
| Date of implementation            | September 2017 |
| Date of revision                  | December 2022 |
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1. Introduction and Purpose

The organization SolidarityNow (SN) was founded in 2013 in order to support the most vulnerable members of Greek society, without discrimination, through innovative social initiatives. The organization is committed to operating its programs and functions in a way that safeguards and promotes the well-being of all children it comes into contact with, directly or indirectly.

SN implements a zero-tolerance policy against any form of exposure to the danger of and/or to exploitation of its beneficiaries, including children, who work for or with the organization. At the same time, in cases of violation of this present Policy, SN reserves the right to take all necessary measures foreseen in the Policy, as well as SN’s Employee Code of Conduct and Concern Response and Feedback Mechanism; the above measures are in addition to any legal ramifications. The present document describes the policies and relevant procedures governing the activities of the organization in order to prevent the risk of children’s exposure to any sort of harm, while it also defines the sequence of actions taken by the organization in case of violation of the Child Safeguarding Policy.

The activities of the organization, as well as its Child Safeguarding Policy, are governed by the principles of the United Nations Convention on the Rights of the Child1. More specifically, they safeguard the following core principles:

- Non-discrimination,
- Best interest of the child,
- Right to survival and development,
- Respect and consideration for the views of the child on issues that concern them.2

The Child Safeguarding Policy is based on the responsibility of any actor that comes into frequent contact with children to ensure that its staff, functions, and programs do not harm children, i.e. do not expose them to any risk of harm and abuse, and that the concerns that the actor has for children’s safety within the communities where it conducts its activities are reported to the competent authorities3.

The Child Safeguarding Policy includes both preventive actions to minimize the possibilities of causing harm, and actions in response to such eventualities that ensure the incidents identified, confirmed or otherwise, are reported to the competent authorities without delay, always with the best interest of the child as a guiding principle.

The organization is also committed to the “no harm” principle, recognizing that harm against children may also be caused despite the best intentions of the organization, as a result of its activities; hence, it is the organization’s obligation to prevent such incidents, and face them in an appropriate and timely manner, if they do arise.

2. Definitions

1 https://www.unicef.org/child-rights-convention/convention-text
3 The International Safeguarding Standards and how to implement them, Keeping Children Safe Coalition, p. 5.
Children: Any person under 18 years of age.

Child maltreatment:
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:
Physical abuse of a child is defined as 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.

Emotional or psychological abuse:
Emotional and psychological abuse involves [...] acts [that] may have a high probability of damaging the child’s physical or mental health, or its physical, mental, spiritual, moral or social development. Abuse of this type includes: the restriction of movement; patterns of belittling, blaming, threatening, frightening, discriminating against or ridiculing; and other non-physical forms of rejection or hostile treatment.

Sexual abuse:
Sexual abuse is defined as 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, or else that violates the laws of society. Children can be sexually abused by both adults and other children who are — by virtue of their age or stage of development — in a position of responsibility, trust or power over the victim.

Neglect:
Neglect of a child may be based on repeated conduct or on a single incident or omission that results in, or should reasonably be expected to result in, serious physical or mental injury or a substantial risk of death to the child. Neglect can include, but is not limited to, the failure to provide sufficient food, nutrition, clothing, shelter, supervision and medicine. It can also include the failure to make a reasonable effort to protect a child from abuse, exploitation or neglect by another person.

Exploitation:
Exploitation of a child refers to the use of the child in work or other activities for the benefit of others and to the detriment of the child’s physical or mental health, development, and education. Exploitation includes, but is not limited to, child labour and child prostitution.

3. Application of Child Safeguarding Policy

The Child Safeguarding Policy is embedded in all aspects of the organization’s activities, including the recruitment process, management, the behavior of staff, external collaborators (partners and suppliers), interns, and volunteers, the practical implementation of programs, data collection, processing, and storage, as well as the management of the natural environment of the organization’s spaces. SN is committed to doing everything in its power and within the framework of its operations to secure that children are protected, and that no harm is ensuing from the implementation of its programming or other relevant activities. However, this commitment does not in any way override

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6 Ibid.
7 Ibid.
8 Ibid.
10 Ibid.
the responsibility of parents and legally appointed guardians towards their children’s care.

The present policy focuses on any deliberate or inadvertent harm against children that may occur in SolidarityNow, within the framework of its functions and/or programming it is implementing. At the same time, it outlines the procedures to be followed in case SN staff formulate any suspicion of child abuse, confirmed or otherwise, where the perpetrator is a member of the child’s wider community, or is employed by a donor, a partner, or a supplier of the organization, or any other service provider.

4. Preventive actions on the risk of violations of the rights of children:

A. Human Resources

The Child Safeguarding Policy is in effect for all those working for, with, and/or on behalf of SN. This includes members of the Board of Directors, senior management, staff members, external consultants, external partners, collaborators, and supplies, interns, and volunteers, irrespective of the nature of their collaboration with the organization (full or part-time, paid or unpaid). The Child Safeguarding Policy is complementary to SN’s Code of Conduct, and together they define what constitutes acceptable behavior.

Recruitment, Shortlisting, and Hiring Processes:

i. A clear statement regarding SN’s commitment to the protection of children is included in all open positions advertised. Indicatively: “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. The child safeguarding level is clearly indicated in advertised positions, according to the following categorization:

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<th>Level</th>
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<tr>
<td>Level 1</td>
<td>the job holder will not have contact with children</td>
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<tr>
<td>Level 2</td>
<td>the job holder will have some contact with children</td>
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<tr>
<td>Level 3</td>
<td>the job holder will have regular contact with children</td>
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Level 1 corresponds to office-based staff that are not present in the field, hence their framework of working does not by definition involve any contact with children. Indicatively, but not exhaustively, Level 1 includes staff members and volunteers or interns assigned to the following departments: Finance department, HR department, Operations department.

Level 2 corresponds to office-based staff that may have sporadic or occasional with children within the context of their job requirements. Indicatively, contact with children may occur through: monitoring and evaluation visits, mapping exercises, needs/gap assessments, interviews, and development of communication content. Indicatively, but not exhaustively, Level 2 includes staff members and volunteers or interns assigned to the following departments: Programmes department, Communications department. Higher management staff is also included in Level 2, since they may conduct ad hoc field visits within the context of their managerial role.

Level 3 corresponds to staff with field presence and regular contact with beneficiaries. Given the humanitarian/service nature of the organization’s work, and its activities supporting vulnerable groups (which include children), the beneficiaries of the organization’s activities may be children. All staff members, interns and volunteers involved in service provision to beneficiaries are classified as Level 3.

SN reserves the right to modify the classification levels after important changes in the organization’s
organigram, strategic priorities, and/or current program cycle.

iii. Staff on Levels 2 and 3 will be required to answer specific questions on child protection during the recruitment process (for staff members) and during the selection and assignment stage (for interns and volunteers). Such questions will enable the organization to better screen the ability of the candidate to identify and manage risks arising from working with children.

iv. All candidates selected to be hired, as well as interns and volunteers who wish to work with the organization, are required to submit a copy of their criminal record, as a necessary condition to complete the hiring process or the appointment of an intern/volunteer. This is in alignment with the Joint Ministerial Decision 10616/2020 (Β’ 3820) of the Ministers for Migration and Asylum and Finance for the inclusion of all staff to the national Register of Greek and Foreign Non-Governmental Organizations working with issues of international protection, migration, and social integration within Greek territory. According to the above legislation, any conviction raising concerns for children’s safety (indicatively sexual abuse, pedophilia, human trafficking, drug trafficking, violent offenses) is a valid reason for the organization to withdraw a job offer. Copies of criminal records, as well as the entirety of an employee’s file, are kept in the archives of the Human Resources department, per the legal requirements and regulations on data protection.

v. All new employees, interns and volunteers are informed about their obligation to comply with SN’s Code of Conduct, as well as the present Child Safeguarding Policy, during their first week of induction to the organization (first week of employment). In addition, they are required to sign the relevant acknowledgement form, which is stored in the HR file kept for each staff member. Any question or request for clarification must be addressed to the HR department. The latter is responsible for securing that all staff members have signed and returned the acknowledgement form. Indicatively, the wording on the acknowledgement form can be: “I acknowledge receipt of the SolidarityNow Handbook-Code of Conduct and Ethics and that of SolidarityNow’s Child Safeguarding Policy”. Finally, a copy of the Child Safeguarding Policy is available and easily accessible to all staff members.

vi. All staff members, interns and volunteers are regularly informed about the policies and procedures governing child protection, whether formally through relevant trainings and skills development activities, or informally through group meetings and conversations with their line managers. All employees, upon hiring, are required to complete an online general training on the protection of beneficiaries from sexual exploitation and abuse. When it comes to child protection programming specifically, the continued training of staff on such matters is scheduled as a regular component of the project’s implementation.

B. Project implementation

When implementing projects and activities, any potential risk of harm to children must be taken into account during all stages of operation, including initial project design, implementation, and completion and evaluation stages.

i. As soon as such risks are identified, mitigation measures for minimizing harm must be implemented. Mitigation measures should encompass relevant targets, activities, as well as action plans for their implementation. All of the above should be outlined in all funding proposals before their submission.

ii. The existence of a child safeguarding policy, or lack thereof, is a factor to be taken into account during forging collaborations with partners, especially when it comes to developing funding proposals.
and potential future partnerships for projects involving direct contact with children. As partnerships are explored, the project manager must evaluate whether the potential partner is aligned with SN’s Child Safeguarding Policy, as well as its overall commitment to child protection.

iii. Given the humanitarian nature of its work, SN is often called upon to operate where needs are most pressing, and consequently where circumstances are suboptimal. With that in mind, the location and/or facilities chosen for the implementation of activities must be carefully evaluated as to whether they expose children to risks, and ideally must configured (or suitable to be reconfigured) as child-friendly spaces. The organization encourages the selection of spaces without obstacles that may cause physical harm (i.e. debris, environmental hazards), that are protected (i.e. no exposure to high-speed roads), that are well-lit and do not expose children to risk of abuse or exploitation (i.e. no remote areas, areas with limited visibility). Whenever such risks are identified, mitigation measures must be put in place (e.g. signposting that is appropriate and accessible to children, blocking access to dangerous places). If the dangers identified are multiple and/or cannot be mitigated to an acceptable level, SN must weigh the projected benefits for its beneficiaries, including children, against the dangers involved; if necessary, it may decide not to move forward with the implementation for the foreseen activities.

iv. All scheduled and implemented activities must be safe for children, and appropriate for their age and maturity levels.

v. For any activity involving children, the need to receive written consent by their parent/guardian for their participation must be examined. The parent/guardian’s written consent is considered a necessary condition for the participation of children in the following indicative activities: provision of individual psychosocial support, legal representation, and participation in educational and/or recreational programs. The consent form is made available in a language understood by the parent/guardian, adequately explaining the activity that the child wishes to participate in, including the time and place in which it will be conducted.

vi. When implementing an activity with children, staff members abide, to the degree possible, by the two-adult rule, i.e. they make sure there are at least two adults in the space where children are present. In cases where the nature of the activity does not require, or does not facilitate the presence of two adults (e.g. educational activity in a classroom, individual session with a psychologist, individual accompaniment to a public service), other preventive measures are taken to safeguard the safety of the child. Such measures may involve the following: provision of services in a designated space, within working hours, with other adults close by; running the activity maintaining the room’s door open; using SN-operated or public means of transportation.

vii. If the transportation of a child is necessary for the service in question, the child must be accompanied by their parent or legal guardian. In exceptional cases, and always with the written consent of the parent/guardian, as outlined above, a child may participate in activities only escorted by SN staff (e.g. educational trips). For the transportation of children, only vehicles owned or leased by SN may be used, in addition to public means of transportation. Whenever an SN vehicle is used, all safety measures outlined in road traffic legislation, and especially measures specifically meant for the protection of children, are adopted. Staff members driving SN vehicles adhere to SN’s Code of Conduct for drivers. Transporting beneficiary children through their own means of transportation is forbidden for SN staff; this option is acceptable only in emergencies, if no suitable alternative can be found.

viii. Any service and/or activity that provides Internet access must not expose children to risk of
harm and abuse, for example online child abuse\textsuperscript{11}, or exposure to pornography. Access to inappropriate content is avoided by placing electronic firewalls. Any IT equipment that can be accessed by children is placed in a public space, which is always supervised by SN staff.

ix. Practical procedures and preventive measures related to child protection are subject to continuous monitoring and evaluation, in order to secure their suitability according to changing circumstances in the field, to identify any ensuing concern, and to channel good practices both into designing future activities, and into redefining ongoing programming.

C. Media and communication

The Child Safeguarding Policy is transversal to all SN communication and dissemination activities, as well as the formulation of its informational material.

i. All staff members, partners, volunteers and interns must ensure that children’s safety is in no way jeopardized by the transmission or the publication of images, videos and/or their content.

ii. Children’s right to privacy must be respected at all times. Before taking images or videos, staff must obtain children’s explicit oral consent. No image, video, or other type of content will be disseminated or published before the child’s parent or legal guardian gives their written consent. The content’s aim and use must be explained to the guardian and to the child (adapted to their age and level of maturity), in a language they can understand. Children have the right to refrain from participating in such content creation, even if the parent/guardian gives their consent.

iii. All media content must respect children’s dignity. Content where children are depicted without appropriate clothing, in inappropriate positions, or in true danger, pain, or agony, will under no circumstances be considered acceptable, even if it concerns reposting/republishing content put forward by another actor or media source. If the publishing of such content is in service of the organization’s humanitarian strategic goals (e.g. within the framework of advocacy/rights claiming), the child’s image must be modified (e.g. pixellation) in order to avoid the identification of the child themselves.

iv. The Communications department ensures that all professionals working with media that want to report on the work of SN are aware and aligned with the organization’s Child Safeguarding Policy. In case they fail to comply with the Policy, and the Communications department is unaware of the violation, or unable to intervene, the chief of the department must report the incident to the Management team. In these cases, SN has the right to take all necessary measures, including pressing charges. The protection of children’s rights, as well as the safeguarding of the organization’s integrity and reputation as a service provider, is of utmost importance.

v. Any request for content development by media providers involving photographing, videotaping, or interviewing children should be addressed to the Communications department, which is responsible for accepting or rejecting the request, and seeking the feedback of the Programmes department colleagues who are in touch with the beneficiaries implicated in the request.

vi. In case of unexpected field visits by media professionals, SN program coordinators/managers are responsible for immediately notifying the Communications department. In such cases, SN staff who is

\textsuperscript{11} Online child abuse, for example “online grooming”: building an emotional relationship with a child in order to gain their trust, resulting in sexual abuse, exploitation, or human trafficking.
present in the field reserves the right to deny access to SN spaces, as well as prevent any communication between media professionals and children that SN has under its care (e.g. unaccompanied children in housing or guardianship program).

vii. When external actors (e.g. journalists, photographers, or producers of any media content) implicate children beneficiaries in media content development within the implementation framework of an SN program, they have to be accompanied by an SN staff member, in addition to the child’s guardian; the SN staff member will be responsible for ensuring compliance with the appropriate processes. It must be noted that any media content development that SN has not been notified about (e.g. interview request addressed directly to a beneficiary), the parent or legal guardian of the child beneficiary bears the responsibility for protecting the children under their care.

viii. Bearing in mind the vulnerability of the children serviced through SN programming, any material produced for media and communications should not include information that could potentially be used for identifying or locating the children involved. Such information may be the children’s full name, their address, or any easily recognizable characteristic that could be utilized for their identification. It is generally preferred to use a pseudonym or children’s initials.

ix. Metadata and geographic location functions should be disabled during the publication of content. SN staff should bear this in mind during the creation of any content via smart devices, as in many cases geographic location is automatically enabled.

x. SN reserves the right to ask its staff, partners, volunteers and interns to take down content on their personal accounts that is in violation of the Child Safeguarding Policy, and which exposes children to risk. If the violation is serious, or happens repeatedly, SN may terminate the collaboration with the person involved.

xi. Staff, partners, volunteers and interns are encouraged to share content published on SN’s official website or social media accounts (Facebook, Instagram, Twitter, LinkedIn, YouTube, Vimeo). In this manner, officially approved content is widely distributed through personal social media accounts.

D. Field visits

The Child Safeguarding Policy concerns all visitors to SN premises. Those include donors, partners, members of the Board of Directors, policymakers, government representatives, suppliers, volunteers etc. This list is indicative, but not exhaustive.

Every effort must be made to ensure that any visit and contact with children is scheduled and approved. Visitors must be informed ahead of time, by the staff member organizing the visit, that they are obliged to comply with SN’s policy on safeguarding children.

Visits, and especially donor visits, may be realized on an ad hoc basis, with short or no notice. In such cases, if the visit includes contact with children, visitors must at least be informed that they must comply with the following rules:

• Respect for children’s right to privacy and dignity is considered a given.
• Any behavior exposing children to risk or harm is strictly forbidden.
• The two-adult rule is always respected during visits, so that children are never left alone with a single visitor. Visitors meeting with children are always accompanied by an SN staff member. In appropriately justified cases, and always with the project coordinator’s prior approval, two
or more visitors meeting with children may do so without being accompanied by an SN staff member (e.g. during project evaluations by a donor).

- All rules concerning media content publication outlined in section 4C are respected.
- It is self-evident that compliance with national child protection legislation is binding for all visitors.

5. Staff conduct
Staff conduct, both within and outside of working hours, must be aligned with SN’s core values. Responsibility for the safeguarding of children is shared across the board, regardless of position or mandate.

i. Staff members must take necessary measures in order not to risk being accused of inappropriate conduct both within and outside of working hours.

ii. SN works with volunteers in programs and activities involving children beneficiaries, always ensuring appropriate guidance and oversight is provided by staff with relevant experience. Volunteers are not placed in positions bearing responsibility towards children (indicatively, psychologists, social workers, lawyers, caretakers in accommodation programs, or coordinators).

iii. Any communication and in-person meeting with children beneficiaries not included in SN’s working framework is strictly forbidden. All meetings with children are realized within SN’s operating spaces, and communication with children takes place during working hours. It is important to note that, due to the nature of certain programs, SN staff may be called upon to meet and/or communicate with children outside of working hours and spaces (e.g. accompaniment to public services due to an emergency, accompaniment to organized activities for integration, education, or recreation purposes). In these cases, relevant communications and meetings are considered to be within the working framework.

iv. SN staff, interns or volunteers should not share their personal information (e.g. contact information); at the same time they should not ask for personal information, or accept it when children beneficiaries offer them. Communication with children, when required by the working framework, takes place via the organization’s means (e.g. SN phone, SN email address).

v. As mentioned in the HR section, staff members selected for positions who have contact with children are appropriately trained on child protection issues. Using appropriate language for communicating with children, adapted to their age and maturity level, is considered a prerequisite; inappropriate or indecent language is by no means acceptable.

vi. Inappropriate physical contact, or physical contact that may violate a child’s dignity, is strictly forbidden. At the same time, staff members are appropriately informed and maintain a sense of intercultural awareness in matters of physical contact (e.g. some religious practices may even discourage handshakes between people of the opposite gender). In cases of reasonable exceptions, for example when staff members accept a hug from a child, or judge that it is appropriate to hug a child (e.g. to comfort them), this should always happen in the presence of other adults, and only in cases where both sides understand the reason behind the hug and have, be it indirectly, given their consent.

6. Reporting and handling of possible child protection cases
SN takes any violation of the Child Safeguarding Policy seriously, much like any violation of children’s
This is our common ground

rights in general. All concerns and reports, no matter their source, are thoroughly investigated. Anyone who raises concerns or reports a relevant incident is treated with respect and discretion. The handling of reports of possible violations of the Child Safeguarding Policy, like any other potential complaints and reports, is outlined in detail in SN’s Concern Response and Feedback Mechanism (CRFM). It is underlined that reports concerning child protection issues are treated with the highest prioritization and urgency, due to their sensitive nature and the high vulnerability of children.

A. Submission of reports of child abuse incidents

i. The source of the report may indicatively be one of the following: staff members, volunteers, external partners, family/community members, or the children themselves. As outlined in the Concern Response and Feedback Mechanism, concerns may be expressed orally, in writing (indicatively via email or the organization’s social media), through scheduled community meetings and focus group discussions aiming to collect feedback, through the CRFM email address complaints@solidaritynow.org, or through the complaint boxes placed in SN spaces. The two last ways of submitting a report are also geared to safeguard the anonymity of the submitter, if they so desire.

ii. All possible, real or suspected concerns regarding a violation of the Child Safeguarding Policy must be reported within 24 hours. Situations of imminent danger for the child’s safety that come to the attention of an SN staff member, intern, or volunteer must be reported immediately to the designated staff member (see below), either orally or by phone, so that the necessary measures can be taken. The written report of the violation is postponed until the danger is no longer a concern.

iii. Failing to report a confirmed violation of the Child Safeguarding Policy, or even a reasonable suspicion of a violation, may constitute neglect, which is one of the forms of child abuse. Consequently, it may be considered a violation of the code of conduct of certain professions, and may even be prosecuted on the basis of the national legislation. In any case, if an SN employee, intern, or volunteer fails to report such an issue, the organization may terminate the collaboration.

iv. The report submitter, who may be an SN staff member, an external partner, or a beneficiary, reserves the right to submit the report orally to the person they judge most suitable. In general, the designated people for reporting such concerns are the Monitoring and Evaluation Officers in charge of operating the CRFM. At the same time, people who may receive reports of violations of the Child Safeguarding Policy are project coordinators, as well as managers and department heads. However, and especially if the report submitter is a child beneficiary, the report can be addressed to the person the submitter feels most familiar with. The receiver of the report is obligated to follow the steps outlined by the CRFM, and may seek relevant guidance from their line manager or the Monitoring, Evaluation and Accountability Manager. Confidentiality is of outmost importance when such concerns are raised. Nevertheless, no promises should be made regarding this topic, as confidentiality may have to be broken (e.g. when the report submitter or a third party are in danger). If the report receiver understands that confidentiality will have to be broken, they must inform the submitter then and there. Information is shared strictly on a need-to-know basis, so that the child in question remains safe and the appropriate support is provided.

v. The channels through which a report or complaint, including a possible violation of the Child Safeguarding Policy, can be communicated are posted in clearly visible spots within SN spaces, and explained in a way that can be understood by all beneficiaries (the material is translated into the main languages understood by beneficiaries, and the language level is adapted so that it can be widely accessible). Staff working in projects involving children ensures that the right to submit a report or complaint, as well as the relevant channels, are explained to children beneficiaries from the beginning,
in child-friendly language, and regular reminders are issued. Finally, staff ensures that children beneficiaries understand their rights and can identify inappropriate behavior, so that they are in a position to recognize potential violations of the Child Safeguarding Policy.

B. Handling of reports of child abuse incidents

SN may receive reports concerning possible, suspected, or confirmed child abuse by:

a) the family, the wider family network, or the community,
b) a staff member, intern, volunteer, or external SN partner,
c) a representative of an actor, such as a donor or other service providers.

Regarding reports under category [a]:

Such reports often fall under the normal operation of child protection programs implemented by the organization, whose function includes offering support services for child abuse cases. Consequently, such reports are handled according to the regular procedures foreseen for each case (e.g. alerting the competent Public Prosecutor for cases needing investigation, alerting the police for cases where abuse is directly witnessed), and always according to the main child protection principles, the codes of conduct of relevant professions, and the wider framework of Greek legislation.

If the report does not happen with the framework of a program offering child protection services, and cannot be supported by such a program through an internal referral (e.g. in cases where the report concerns a beneficiary without geographical access to SN's child protection services), the guidance of SN child protection staff can be sought to better process the report, while at the same time the beneficiary should be referred to an actor providing relevant services. In any case, if the incident involves a violation of national legislation, SN is committed to reporting it to the competent authorities, always with the aim of safeguarding the best interest of the child.

Regarding reports under category [b]:

Such reports fall clearly under the provisions outlined by the Concern Response and Feedback Mechanism of the organization, and are categorized in the most highly prioritized category of reports that can be received via the CRFM. For reports of child abuse within the organization, the Complaints Handling Committee immediately reports the incident to the General Manager, while the Board of Directors is also informed.

If the report needs to be investigated and confirmed, the Complaints Handling Committee takes all necessary measures to prevent the alleged perpetrator from any further contact with the child or children involved in the reported incident. If the report concerns a serious potential violation of the Child Safeguarding Policy, which may involve imminent danger for children beneficiaries, necessary measures are taken so that the alleged perpetrator has no further contact with any beneficiary children, until the investigation is concluded and the Committee reaches its finding.

If an SN staff member raises concerns over another staff member, and provided that there is no malicious intent, no criminal charges will be brought against the individual raising the concern or submitting the report; at the same time, protective measures will be taken (e.g. protection from
Depending on the severity of the incident, and even if the actor is not notified, donor or other service providers are notified, depending on the severity of the incident. The latter are responsible for notifying the actor in question of the claim against their employee, so that an internal investigation can be launched per the actor’s complaint response mechanism; SN ensures that the accused person or people are not the individuals that receive and process the report. SN also asks for confirmation of the reception of the report, and that the relevant internal processes are launched. Depending on the severity of the incident, and even if the actor’s internal investigation is still in progress, SN may – unilaterally, if needed – take measures to remove the beneficiary children from the alleged perpetrator(s).

If the report concerns a reasonable suspicion of violation of the Greek legislation on child abuse, or a violation that has been directly witnessed, SN reserves the right to alert the authorities before notifying the actor employing the perpetrator.

SN takes into consideration any case of serious violation of the principles of SN’s Child Safeguarding Policy and of the Greek legislation when contemplating future collaborations with the actor involved. If the actor is currently collaborating with SN through any formal agreement (e.g. memorandum of understanding, service contract), the violation may constitute sufficient ground for terminating the collaboration.

7. Data collection, processing, and storage

All staff involved in data collection and processing that involves children must ensure that the appropriate procedures are followed regarding their safe storage, per the requirements of the national legislation around personal data protection. Given the personal nature of such data, and especially the sensitive nature of much of the data processed in the framework of SN programming (e.g. child protection programs that include supporting child abuse victims), all additional means of data protection are analyzed during the project design stage. For example, for the recording of child...
abuse incidents, victims’ initials may be used exclusively.

All staff involved in processing data related to possible, confirmed, or suspected violations of the Child Safeguarding Policy take all necessary measures to protect the children’s data, as well as the personal data of other individuals involved (e.g. the person submitting the report). All information must be kept secure and strictly confidential, while access may only be given on a need-to-know basis, as outlined by the CRFM. The same principle applies to all electronic databases SN may choose to use.

8. Accountability, monitoring & evaluation (M&E), and review of the Policy

All SN staff and all those working for or on behalf of SN have the responsibility to ensure that children are protected from any kind of harm or abuse. All suspicions of violations of the Child Safeguarding Policy should be reported according to the processes described in this document; no individual should work under the assumption that someone else is responsible for submitting the relevant report.

All SN staff and all those working for or on behalf of SN are always accountable, primarily towards SN beneficiaries, and especially the children the organization is committed to protecting, but also towards donors and the wider society, within whose framework SN operates. SN’s values should always be demonstrated in practice.

The present policy must be reviewed every 5 years, but can also be revised on an ad hoc basis as often as needed, so that it remains relevant to the context, and it reflects all significant changes in the relevant national legislation, in SN’s strategic priorities, in its programming cycle, and in the humanitarian field in general.