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SolidarityNow
Sexual Harassment, Exploitation and Abuse Prevention
Policy

Version: October 2023

Internal document reference number	
Policy title	Policy on the Prevention of Sexual Harassment, Exploitation and Abuse
Category	SolidarityNow's Internal Policies -PSHEA
Description	Policy and relevant procedures that define SolidarityNow's commitment to protect beneficiaries, colleagues, trainees, volunteers from exposure to any form of sexual exploitation and abuse
Target audience	SolidarityNow staff Members of the Board of Directors Partners & Suppliers Trainees & Volunteers
Compliance requirement	Mandatory Harassment, Exploitation and Abuse Prevention Policy complements the SN's Code of Conduct, which is binding on all SN staff members.
Date of application	October 2023
Revision date	

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1. Introduction and Purpose

SolidarityNow (SN) was established in 2013 to support the most vulnerable members of society, without discrimination, through innovative social actions. The Organisation is committed to conducting its programs and operations in a way that ensures and promotes the well-being of all persons with whom it comes into contact, either directly or indirectly, as well as to promote and maintain a safe and respectful workplace.

SN applies a **zero-tolerance** policy towards any form of risk exposure and/or exploitation of the beneficiaries of its programs, including children, as well as the SN staff (incl. volunteers and interns) by those working for or with the organization. At the same time, it reserves the right to take all necessary measures in cases of violations, as provided for in this Policy, as well as the Code of Conduct and the Concern Response and Feedback Mechanism (CRFM), in addition to the legal procedures provided.

The actions of the Organisation, as well as the Policy for the Prevention of Sexual Harassment, Exploitation and Abuse (PSHEA) are governed by the principles of the United Nations International Convention on Human Rights¹, and more specifically, ensure the basic principles of the Convention, namely:

- the principle of non-discrimination,
- ensuring dignity,
- equality and freedom.

This document describes policies and relevant procedures that regulate the activities of the organization, to prevent the risk of exposure of beneficiaries, employees and other related SN individuals (e.g. trainees & volunteers) to any form of sexual harassment, exploitation and abuse, while it defines the sequence of responsive actions, to ensure that identified incidents of confirmed or suspected violation are appropriately addressed and reported without delay.

SN takes seriously all reports of sexual harassment, exploitation, and abuse and will carefully examine allegations, investigate, and take appropriate disciplinary actions where this is needed, taking into consideration the rights and interests of the victim.

SN makes very clear that sexual harassment, exploitation and abuse, and child abuse in any form, perpetrated by our staff, partners or other related SN individuals, towards anyone, will not be tolerated.

2. Scope of Application

The Policy for the Prevention of Sexual Harassment, Exploitation and Abuse runs through all aspects of the organization's activities, including recruitment, management, conduct of staff, practical implementation of programs, data collection, processing, and storage procedures, as well as management of the physical environment of the facilities.

This policy applies to **all** SN staff, Board of Directors, consultants, volunteers, suppliers, or other

¹ [UN Universal Declaration of Human Rights](#)

individual contractors, regardless of their contractual relationship with the organisation (full-time or part-time, paid or not), collectively “**SN Individuals**”, and likewise to other entities and their employees and individuals who have entered into partnerships or agreements with SN in order to carry out joint projects (e.g. donors, external partners etc.), collectively “**non-SN individuals**”.

The policy applies both during, and outside, normal work hours. Actions taken by SN individuals and non-SN individuals outside of working hours that are seen to contradict this policy will be seen as a violation of this policy.

3. Definitions

Sexual exploitation: An actual or attempted abuse of someone's position of vulnerability (such as a person depending on you for survival, food rations, school, books, transport, or other services), differential power or trust, to obtain sexual favours, including but not only, by offering money or other social, economic or political advantages. It includes trafficking and prostitution².

Sexual abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions³. All sexual activity with a person under the age of 18 – a child – is considered sexual abuse. Sexual abuse includes rape, sexual assault, sex with a child and sexual activity with a child.

Sexual Exploitation and Abuse (SEA): the combination of sexual exploitation and sexual abuse acts or incidents or attempts and threats thereof. SEA constitutes acts of serious misconduct and are therefore grounds for disciplinary measures, including termination of employment. The acronym “SEA” is commonly used to refer to acts committed by United Nations (UN), UN partners or affiliates, NGO and inter-government personnel and volunteers against the affected population. SEA occurs when people in a position of power or trust exploit the vulnerability of the affected communities for sexual purposes.

Sexual harassment [vs SEA]: Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behavior, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex; both males and females can be either the victims or the offenders⁴.

The key difference between Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) is the victim: in the case of SEA, the victim is a person of concern, or a member of the local or host community. In the case of SH, the victim is a fellow humanitarian worker, whether working with SN or with another agency or partner organization. In both cases of SEA and SH, the perpetrator is a fellow humanitarian or development worker. Both forms of sexual misconduct are unacceptable, and SolidarityNow is committed to eradicating them from its operations and offices and ensuring that all

² United Nations, Secretary General’s Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse, ST/SGB/2003/13, 2003, available at: <https://digitallibrary.un.org/record/504355?ln=en>

³ Ibid

⁴ United Nations, Secretary-General’s Bulletin on Prohibition of Discrimination, Harassment, Including Sexual Harassment, and Abuse of Authority, ST/SGB/2008/5, 2008, available at: <https://digitallibrary.un.org/record/620578>

victims receive the support they need.

Gender Based Violence (GBV) [vs SEA]: umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially ascribed (gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private.⁵ Even though SEA is a form of GBV, SEA does not always happen against the victim's will - some consensual acts can constitute SEA.⁶ On the other hand, since SEA is a form of GBV, it is recommended that response services for victims is provided in line with existing referral pathways.

PSHEA: Protection from Sexual Harassment, Exploitation and Abuse (PSHEA) constitutes a set of policies and practices that aim to reduce the risk of, prevent and respond to sexual harassment exploitation and abuse (SHEA) by the organization's SN individuals and non-SN individuals. PSHEA ensures that allegations of SHEA are reported and responded to in a timely and appropriate manner, and that victims of SHEA are referred to appropriate services, and receive the necessary support, in line with a victim-centered approach.

Victim [/survivor]: a person who has been subject to SHEA or an attempt thereof.

Complainant: A person who brings an allegation of SHEA to the attention of the organization. The complainant may be the SHEA victim, or another person who is aware of the wrongdoing, including people directly involved with the organization (e.g., employees, board members, volunteers), as well as any outsiders, such as suppliers, partners, or anyone else in contact with, or influenced by, the organization. The complainant and the victim, if they are different persons, must be protected from retaliation for reporting SHEA.

Retaliation: Threats or acts of retribution against an individual who raises concerns, makes claims or assists in providing information about SHEA. Examples of retaliation may include - but are not limited to - threatening the non-renewal of a contract, publicly or privately speaking of the allegations (e.g., with the complainant), continued harassment in any form, discriminatory treatment, isolation or failure to consider individual concerned for a warranted post or promotion.

Whistleblower: a whistleblower is a type of complainant, not the survivor, who is staff member, intern, volunteer, or anyone who reports misconduct, including SHEA. Organizational policies encourage individuals to report concerns or suspicions of misconduct by colleagues by offering protection from retaliation for reporting.

Subject (of complaint): The term used during the investigation process to refer to the staff member(s) against which the complaint, allegation or concern has been raised (the alleged perpetrator).

4. Guiding principles

SN is dedicated to applying the below mentioned principles through the implementation of PSHEA

⁵ IASC, Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action, 2015, available at: https://gbvguidelines.org/wp/wp-content/uploads/2016/10/2015_IASC_Gender-based_Violence_Guidelines_full-res.pdf

⁶ UNHCR, Investigating Allegations of Sexual Exploitation and Abuse. A Toolkit for Partners, 2021, available at: <https://interagencystandingcommittee.org/system/files/2021-12/Toolkit%20-%20INVESTIGATING%20ALLEGATIONS%20OF%20SEXUAL%20EXPLOITATION%20AND%20ABUSE%20IN%20HUMANITARIAN%20SETTINGS.pdf>

Policy:

Accountability: Beneficiaries, SN individuals and non-SN individuals shall be informed about their rights, including their right to make (and withdraw) SHEA allegations. Victims shall be kept informed about any next steps related to their case, including investigation and referral to GBV services, and shall be provided information on any obligation for service providers to report to the authorities (mandatory reporting) to enable them to make informed decisions.

Accessibility: Multiple channels should be available for complainants/survivors and other person(s) to raise allegations, report rumors and concerns regarding potential SHEA cases. These channels must be accessible by all people, including those who are at increased risk (for example children, persons who are illiterate, etc.).

Victim centered approach: All responses to SHEA complaints and allegations must be developed in a way of engaging with victim(s) that prioritizes listening to the victim(s), avoids re-traumatization, and systematically focuses on their safety, rights, well-being, expressed needs and choices. A victim-centered approach gives back as much control to victim(s) as feasible and ensures the empathetic and sensitive delivery of services and accompaniment in a non-judgmental manner.⁷

Non-discrimination: Every victim, irrespective of race, skin colour, sexual orientation, gender identity, language, religion, political or other belief, national or social origin, property, birth, health or other status, or any other characteristic, is entitled to the most appropriate response in accordance with the definition of a victim-centred approach.

Confidentiality: SN will respect the confidentiality of complainants, victims, and other relevant parties at all times. All SHEA-related information will be kept confidential, identities will be protected, and personal information of survivors shall be collected and shared only with the informed consent of the person concerned. Disclosure of information will be on a strict need-to-know basis and even where the victim gives such consent, only pertinent and relevant information shall be shared with others for the purpose of helping the victim (such as referring for GBV services, or for investigation). Online and physical records should be stored securely to prevent accidental or unauthorized disclosures. All complainants must be made aware of the rights and limits of confidentiality, and their explicit informed consent to proceed with recording the complaint must be obtained in writing.

Duty to report: SN individuals and non-SN individuals who become aware of SHEA have a duty to report immediately through established reporting mechanisms,

Informed consent: The victim has the right to receive all the relevant information ahead of giving consent, and to place limitations on the type of information to be shared and with whom. To ensure that consent is “informed”, SN individuals handling the PSHEA incident must: (a) give all possible information and options available to the victim, in a language and means in which he/she understands; (b) inform the victim that the service provider may need to share their information with others who can provide additional services; (c) explain to the victim what will happen as part of service provision, including follow-up actions associated to investigations of the SHEA case; (d) explain the benefits and risks of services to the victim; (e) explain to the victim that she/he has the right to decline or refuse

⁷ UNHCR, Policy on a Victim-Centred Approach in UNHCR’s response to Sexual Misconduct, available at: <https://www.unhcr.org/media/policy-victim-centred-approach-unhcrs-response-sexual-misconduct>

any part of services (in this case the service provider must inform the victim on the eventual consequences of a revoked consent); (f) explain limits to confidentiality (e.g. duty to report, mandatory reporting).

Well-being, protection, and security: Assistance provided to victims adheres to the principle of “do no harm” and is provided in a manner which seeks to uphold their rights, dignity and well-being. This may entail the implementation of security measures to protect against retaliation, re-victimization and re-traumatization.

5. Roles and Responsibilities

The role of all involved parties in the implementation of PSHEA Policy should be clearly defined. All staff should respond to any PSHEA incident or complaint made to them and feel confident in doing so. Senior management shall ensure an atmosphere of trust, confidence, and value orientation for this purpose. Hence, a specific allocation of responsibilities is established to support that PSHEA Policy will be implemented efficiently, taking into consideration the rights and safety of all involved parties.

A **PSHEA Focal Point**, is assigned to ensure that the policy is followed according to the established procedures and that all the information is documented in secure and confidential manner. PSHEA Focal Point collect all PSHEA reports and is responsible to keep a password protected electronic file with all relevant data. He/She ensures that victims have access to support services through the GBV and Child Protection (CP) referral pathways and to investigation or accountability processes, based on their wishes and informed consent. He/she shall also liaise with the PSEA Focal Points of other organizations as appropriate in case they receive an allegation pertaining to the misconduct of their SN individuals. PSHEA Focal Point is responsible for actively promoting PSEA within the organisation and reports to the General Manager and/or the Deputy General Manager.

SN individuals (including interns and volunteers) can be victims or witnesses of PSHEA incidents or may receive a PSHEA complaint in writing or orally. SN individuals have a duty to report these incidents to PSHEA Focal Point. If a staff member is the victim, may report it to the person feels more familiar.

The **Complaints Handling Committee**, as defined in SN’s CRFM, is the competent body to investigate PSHEA allegations. It is composed of the PSHEA Focal Point, a member of the Human Resources department and a member of the Monitoring, Evaluation and Accountability (MEAL) department and, upon judgment, the organisation’s Legal Advisor. The committee should include people of different genders. In case any of the aforementioned persons are involved in the case, then they should be excluded from the Committee.

The **General Manager, Deputy General Manager and Finance and HR Director and the Regional Director of Northern Greece** constitute the **Management Team** that receives the Investigation reports and decide the most appropriate measures to apply for each case/incident.

The **General Manager** ensures a PSEA policy, procedures and a country level action plan are in place for the organization. She/He takes appropriate actions to prevent and reduce the risk of SEA in their areas of operation and appoints a senior level PSEA Focal Point with clear roles and responsibilities. The General Manager is informed about all PSHEA reports and is responsible for informing the Board of Directors.

6. Prevention of sexual harassment exploitation, and abuse

A. Human resources

Recruitment, Selection and Appointment Procedures:

- i. Each Employment Agreement contains the following clear statement regarding the commitment of SN and the employee/volunteer to prevent sexual exploitation and abuse: "The Employee acknowledges that he/she has never previously participated in sexual misconduct and/or consented to incidents of sexual harassment and/or abuse, as well as that he/she has not been involved with his/her own participation and/or consent in incidents of discrimination of any kind and/or monetary, financial or any other exploitation of a third party'.
- ii. HR Staff tries to identify any concerns relevant to sexual harassment, exploitation, and abuse during the recruitment process (for employees) and during the selection and placement process (for trainees and volunteers). This process aims to better understand the candidate's ability to identify and manage risks, to investigate their knowledge, attitudes, and perceptions.
- iii. For each person successfully selected for the job, a Recommendation Form is sent to previous employers to investigate the person's involvement in incidents of sexual harassment/abuse. Specifically, the following question is included: *"Has s/he been suspected of misconduct? To the best of your knowledge, has the candidate, whether as an employee, (international) civil servant, individual independent contractor or otherwise, ever been subject to any disciplinary measure, contract termination, contract non-renewal or non-extension, or has he/she resigned while under investigation or during disciplinary proceedings, for or in connection with (allegations of) fraudulent, collusive, coercive, obstructive or unethical practices, misconduct, harassment, sexual harassment, abuse of authority, sexual exploitation or sexual abuse, retaliation, or poor or inadequate performance?"*
- iv. All selected recruitment candidates, as well as trainees and volunteers who wish to be employed by the Organisation, are required to submit a copy of their criminal record as a prerequisite for completing the recruitment or signing of a volunteer contract, as provided by the joint decision of the Ministers of Migration and Asylum and Finance no. 10616/2020 (B' 3820) for the registration of staff in the Register of Members of Greek and foreign NGOs are active in issues of international protection, migration and social integration within the Greek territory. Under the above legislation, any conviction that raises concerns (such as, but not limited to, sexual abuse, pedophilia, pimping, drug trafficking, causing bodily harm) is a valid reason for which the organization may withdraw the offer of employment. Copies of criminal records, such as the entire file of the employee, trainee, or volunteer, are kept in the records of the Human Resources Department, in accordance with applicable laws and regulations on personal data protection.
- v. All new employees, trainees and volunteers are properly informed of their obligation to comply with the SN Code of Conduct, as well as with this Policy during their induction process. In addition, they must sign the relevant acknowledgement of information/receipt, which is archived in the human resources file maintained for each employee. Any question or request for clarification should be addressed to the Human Resources Department. The latter is responsible for ensuring that all employees have signed and returned the acknowledgement of information/receipt. The following is an indicative wording of the proof of information/receipt: *"I confirm receipt of the Employee Handbook, the Code of Conduct, The "Concern, Response & Feedback Mechanism Policy", the "SN Child Protection Policy" and the "Policy for the Prevention of Sexual Harassment, Exploitation and Abuse".*

vi. All staff members, trainees, and volunteers during the week of their admission to the organization, have the obligation to attend an asynchronous course on the Prevention of Sexual, Exploitation and Abuse, which is free and accessible. Each employee must send proof of completion of the training (knowledge test included).

vii. All staff, trainees and volunteers are regularly informed about sexual harassment and abuse prevention policies and procedures, either formally through relevant training and capacity building activities, or informally through group meetings and discussions with their supervisors.

B. Implementation of programmes

SN programmes and related activities must take into consideration any potential risk of harm to all individuals at all stages, from initial project design, implementation, to completion and evaluation.

i. Once such risks are identified, mitigation strategies must be put in place to minimize harm. All the above must be taken into consideration in all project proposals before they are submitted.

ii. Policies to prevent sexual harassment, exploitation, and abuse, and therefore the existence or lack thereof, must be considered in the partner search process, in particular with regard to the development of project proposals and possible future cooperation. In this process, the project manager must assess whether the potential partner aligns with the SN Policy and the organisation's overall philosophy of preventing sexual harassment, exploitation, and abuse.

iii. SN should encourage the choice of activity sites that are protected, well-lit and do not expose individuals to the risk of abuse or exploitation (e.g., remote areas, areas with low visibility due to physical features, etc.). Where relevant risks have been identified, mitigation strategies (e.g. appropriate and understandable signage, barriers to access to hazardous areas) must be put in place. If the identified risks are many in number and/or cannot be reduced to an acceptable level, the SN must weigh the projected benefits for its beneficiaries against the risks and, if necessary, may decide not to proceed with the implementation of the respective activities.

v. All planned and implemented activities and services must be safe, appropriate, and accessible (including language comprehension) to individuals.

vi. For any activity involving children, the need to obtain written consent from the parent or guardian before the child participates is considered necessary or is required⁸. Obtaining parent/guardian consent is considered a prerequisite for children's participation in the following indicative activities: provision of individual psychosocial support services, legal representation, and participation in educational and/or recreational programs. The consent form is available in a language understood by the parent/guardian, adequately explaining the activity the child is invited to participate in, including when and where it takes place.

vii. When an activity is carried out, various protection measures need to be taken, including but not limited to the provision of services in the designated workplace and during working hours, with other adults nearby, carrying out the activity with an open door of the room (as long as confidentiality is not violated), or the use of corporate or public transport. Data protection, safeguarding and protection of the confidentiality of disclosed information should be taken into consideration as well.

viii. Practical processes and prevention measures related to the prevention of sexual harassment,

⁸ See more in SN Child Safeguarding Policy (p.8)

exploitation and abuse will be regularly monitored and evaluated to ensure that they are appropriate to changing circumstances on the ground, to properly document any issue or concern, and to channel good practices into activity planning, either for better future planning or for refocusing existing activities.

C. Media and communication

The Policy for the Prevention of Sexual Harassment, Exploitation and Abuse runs through all information/visibility activities of SN and the formation of its communication material.

i. All staff members, collaborators, volunteers, and trainees must ensure that the safety of beneficiaries is not compromised in any way by the dissemination or publication of images, videos and/or their content.

ii. The beneficiaries' right to privacy must be respected at all times. Before taking images or videos, the written consent of the individual must be explicitly obtained in advance. The aim and use of the content must be explained in a language that can be understood by the beneficiaries, who have the right to refuse their participation, even if their prior consent has been given.

iii. All media content must respect the dignity of individuals and prevent them from being exposed to harm. Under no circumstances will content be approved for publication where people are depicted without appropriate clothing, in inappropriate positions, or in a real situation of danger, pain or distress, even if it is republished by another institution or media.

iv. SN reserves the right to ask its staff, partners, volunteers, and interns to remove content that violates Sexual Harassment, Exploitation and Abuse Prevention Policy and that exposes beneficiaries to risks. If the violation is serious in nature or occurs repeatedly, SN may even terminate cooperation with the staff/partner in question.

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

D. Site visits

Every effort should be made to ensure that any on-site visit and contact with the beneficiaries is expected and approved. Visitors should be informed in advance that they are obliged to adhere to the current PSHEA policy. The member of staff organising the visit shall be responsible for this.

Visits, in particular by donors, may take place on an ad hoc basis, at short notice or without prior notice. In such a case and if contact with the beneficiaries is considered part of the visit, visitors should, at least, be informed that they are obliged to comply with the following rules:

- Respect for the beneficiaries' right to privacy and dignity is assumed.
- Any behavior that exposes beneficiaries to risks or may lead to harm is strictly prohibited.
- The two-adult rule is always observed in the case of guests, so that beneficiaries are never left alone with one guest. Also, guests who meet with children are always accompanied by an SN member. In duly justified exceptions and with the consent of the beneficiary person, and always with the approval of the program coordinator, two or more visitors meeting with child beneficiaries may not be accompanied by a member of the SN (e.g. conducting a program

- evaluation by the donor).
- All rules on publication of content in media/communication as developed in Section 5C shall be followed.
- Compliance with national protection legislation binds any visitor.

7. Staff conduct

The overall behaviour of staff, both inside and outside working hours, must be aligned with SN's philosophy and values. Responsibilities to prevent sexual harassment, exploitation and abuse are shared between all, regardless of position or mandate. **Any form of Sexual Harassment Exploitation and Abuse is an act of misconduct and ground of disciplinary sanctions.**

i. Staff members must take the necessary measures not to risk being accused of inappropriate behaviour both during and outside working hours.

ii. SN employs volunteers in programs and activities that include the support of beneficiaries, always ensuring that appropriate guidance and supervision is provided by an employee with relevant experience. Volunteers are not employed in positions of responsibility (indicatively, psychologists, social workers, lawyers, caregivers of housing programs, or coordinators).

iii. It is strictly forbidden to maintain any form of communication and face-to-face meetings with beneficiaries if it is not part of the working relationship. All meetings with the beneficiaries take place at SN's premises of activity, and communication takes place within working hours. It is important to note that due to the nature of specific programs, employees may be invited to meet and/or communicate with beneficiaries outside working hours and outside workplaces (e.g., escort to public services due to an emergency, escort to organized integration, educational and recreational activities). In these cases, corresponding communications and meetings are considered within the framework of work.

iv. SN employees, trainees or volunteers do not share their personal information with the beneficiaries. Communication with the beneficiaries, when necessary for the context of the work, is done by corporate means (e.g., corporate mobile phone, corporate email address, landline of the Organization).

v. As mentioned in the Human Resources section, all staff members selected are properly trained in the prevention of sexual harassment, exploitation, and abuse. It is a prerequisite that all employees, trainees, or volunteers use appropriate language for communication and in no case inappropriate or inappropriate speech.

vi. Inappropriate physical contact, or

vii. contact that may affect the dignity of the person, is expressly prohibited. At the same time, staff members are properly informed and maintain intercultural sensitivity to physical contact issues (e.g., some religious practices even discourage handshakes between people of the opposite sex). In reasonable exceptions, where for example staff members receive a hug from a child, or deem it appropriate to hug him/her (e.g., to comfort him/her), this should always be done in the presence of other adults, and only in cases where both sides understand the reason behind the hug and have, at least indirectly, given their consent.

8. Procedures

A. Reporting incidents of sexual exploitation, or abuse

SN ensures that safe, confidential, transparent, and accessible complaints and feedback mechanisms have been established. The staff of programs involving beneficiaries ensures that the possibility and ways of submitting complaints and reports are explained from the outset, and regularly reminds of this right.

As foreseen by SN's CRFM policy:

All reports concerning sexual harassment, exploitation and abuse are treated with the highest priority and seriousness. Anyone who raises a concern or reports a SHEA incident is treated with respect and discretion.

- i. SHEA complaints can be received through any of the complaint and feedback mechanisms of the organization. Specifically, complaints can be expressed face to face to project staff, in writing (indicatively via email or social media of the organization), through scheduled community meetings and focus group discussions or addressed at Senior management through complaints@solidaritynow.org, or at the complaint boxes located on SN premises. The last two ways of submitting a report also ensure the anonymity of the submitter, if he so wishes.

SHEA complainants will always be notified of the registration of their complaint in the relevant database. Since an investigation might be required, no fixed time-period is set for the resolution of the complaint; however, the complainant will always be notified when such a resolution is reached. If the complainant is not directly involved in the case reported, specific details of the case will be omitted for the protection of the privacy of the individuals involved. The response could not be provided if the beneficiary did not provide any contact information or did not consent to communicate the issue for further investigation.

There is **no deadline to submit a complaint**. However, investigation activities might be limited in cases in which a lot of time has passed between the date of the incident and the complaint or when one or more of the parties involved are no longer SN staff members.

The complainant reserves the right to submit a complaint orally, addressed to the person they deem appropriate and/or feel most familiar with. Any staff member receiving a SHEA complaint (e.g., program coordinators, head of departments) shall, with the complainant/victim's informed consent, report it **formally**⁹ to the PSHEA Focal Point, **within maximum 24 hours**¹⁰¹¹. In case the complaint is received

⁹ In writing to official email. Use of the specific reporting form in Annex IV

¹⁰ In case consent for the official reporting to PSHEA Focal Point is denied, the staff member should inform the complainant/victim of how they can submit a complaint at a later stage, should they change their mind. The staff member should nonetheless inform the PSHEA Focal Point of his/her organization of having received information about a possible SEA incident, without sharing any identifiable information that may make the complainant/victim identifiable.

¹¹ In cases of imminent danger to the safety of the person that come to the attention of the staff member receiving the complaint, PSHEA focal point should be informed immediately, either in person or by telephone, so that the necessary measures can be taken. The written report of the violation is made immediately after the risk has been addressed.



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through the complaint boxes or the dedicated for the complaints email address, the PSHEA Focal Point is responsible for completing the relevant form and collecting any further information that might be needed.

Receipt of the complaint shall be confirmed within 24 hours. The PSHEA focal point (or other staff member as appropriate) contacts the complainant/victim (if the complaint is not anonymous) to reassure them that they are safe and that their concerns have been understood.

PSHEA Focal Point should identify whether the complainant/victim has received assistance through trusted assistance mechanisms, preferably via pre-established pathways, within 24 hours, and follow up to resolve any blockages in case assistance has not yet been provided.

PSHEA Focal Point initiates the procedures for the establishment of a Complaints Handling Committee, therefore "Committee",

Duty to report

All SN individuals and non-SN individuals are obliged to report any concerns, suspicions, or incidents of sexual harassment, exploitation, or abuse of others. Failure to report such suspicions or incidents could lead to disciplinary action being taken at the discretion of SN. There is no obligation to report an incident perpetrated against oneself, although it is encouraged. Whereas partner organizations receiving financing through SN are obliged to report PSHEA incidents and failure to do so shall be grounds for termination of the partnership arrangement.

SN as an implementing partner will report any allegations of SEA to the relevant entity/entities, according to the signed partnership agreements with project/programmes coordinators and funders or/and any other registries.

Guidance on SHEA complaints intake

PSHEA Focal Point & the Complaints Handling Committee, receiving a complaint pertaining to SHEA should:

1. Treat the victim, or complainant, if different, with dignity and respect, make them as comfortable as possible; Use a separate room to ensure privacy.
2. Explain to the victim/complainant the mandatory requirement to report on all SEA allegations¹²
3. Inform the victim/complainant that they can also report the incident to the Inspector General's Office Investigation Service, if they wish so¹³;
4. Get the basic incident information. Avoid asking too many questions. Ask only the relevant questions required to gain a clear understanding of the complaint so that it can be formally

¹² The victim (or complainant, if different) should be informed that there are limits to confidentiality as soon as they come forward with an allegation, while reassuring the survivor that information will only be shared on a "need to know" basis.

¹³ The Inspector General's Office provides independent oversight of UNHCR's activities and operations, including activities undertaken by Partners. It conducts ad-hoc inspections and investigations into misconduct. Online complaint form available here: <https://www.unhcr.org/about-unhcr/governance-and-oversight/inspector-generals-office-igo/reporting-misconduct/igo-online>

- reported. This typically consists of addressing: What, where, when and who. Don't ask 'why';
5. Refer victim to needed services, where appropriate and following victim's informed consent is obtained;
 6. If the complainant is not the victim, do not seek out the victim to provide assistance and services. Refer the case to PSHEA focal point to suggest other actions (e.g. GBV awareness activities, info sessions etc.);
 7. Keep the victim and the complainant (if different) notified in a safe and timely manner of the status and outcome of the investigation.
 8. Ensure safety and mitigation measures are in place, so that risks of retaliation or harm are addressed; Protection measures must concern both the victim and the subject of the complaint.

B. Responding to reports of sexual harassment, exploitation and abuse

1. Investigation

Timely and professional investigations are essential to ensure justice for the victim and the accountability of the subject (the alleged perpetrator).

All information contained in the report, particularly personal information of the complainant/victim and the subject, must remain confidential through the investigation process. Information sharing must be limited to a strict need-to-know basis. The necessity to share information with third parties should be decided on a case-by-case basis, in consideration of the victim's informed consent, the best interest of the victim, and prioritizing the safety of all those involved, including the subject.

All reports will be investigated swiftly and impartially and acted upon appropriately. The safety of the victim(s) and the prevention of further incidents will be the prime considerations. The person(s) alleged to have committed the infraction will be made aware of the report at an appropriate point during the investigation.

The investigation process shall be initiated with the establishment of a Complaints Handling Committee, as defined in the organisation's Concern Response and Feedback Mechanism. The Committee shall meet within 48 hours to assess the risk to address any immediate safety or welfare concerns and seek legal guidance. A decision is taken to involve additional members of the organisation to further investigate the case (e.g. legal counsel for the possible complaint of a criminal offence).

Investigations of complaints or allegations of sexual exploitation and abuse should be undertaken exclusively by dedicated, trained and experienced SN individuals that are charged with this responsibility and who have the necessary skills and competence to undertake such investigations appropriately. All parties should be able to participate in the investigation without fear of retaliation.

This policy is without prejudice to the right of victims and complainants to use external procedures (e.g. criminal justice proceedings) if they opt for such a solution.

If the allegation pertains to the misconduct of a SN staff member or other related SN individuals (e.g. board member, volunteer, consultant etc.).

Reports of this type are classified in the most serious category of reports that CRFM can receive. For reports of sexual harassment, exploitation, and abuse within the Organisation, PSHEA focal point informs immediately the General Manager and/or the Deputy General Manager that a SHEA report has been submitted and an investigation process will be initiated.

In cases where complaints are filed against the General Manager, the Deputy General Manager, then the Finance and HR Director should be informed, who in turn takes appropriate action, in accordance with the CRFM and PSHEA Policy and notify the Board of Directors. In cases where the allegations could potentially result in serious damage to SN's reputation, the Communications Manager must also be consulted to manage the communication response to the incident once these risks have been identified at senior management level.

If the report concerns a potential serious breach of SHEA that may pose real risks to beneficiaries or staff members, the Committee shall take measures to ensure that the alleged offender has no contact with beneficiary persons/staff members until the investigation has been completed and decision has been taken.

If the allegation pertains to the misconduct of an SN Program Participant (e.g. donors, staff member or other related SN individuals of an external partner).

In cases where reports have been received against a cooperating entity, such as a donor or other external partner, the relevant programme coordinator and/or programme manager shall be informed, depending on the severity of the incident. Programme coordinator and/or programme manager are responsible for notifying the entity concerned of the allegation in order for the latter to initiate an internal investigation; Following the Entity's complaint collection mechanism, it must be ensured that the person or persons alleged to be perpetrators are different. SN also requests confirmation that the report has been received and that internal investigation procedures and action points have been initiated.

If the report concerns a well-founded suspicion of a violation of Greek legislation on child abuse or a violation detected in the act, SN reserves the right to inform the authorities accordingly before notifying the institution.

In any case where a serious violation of the principles of this PSHEA and Greek law is found, SN takes it into account in future synergies with this entity. In the case of a cooperating entity with which any formal relationship has been established (e.g., memorandum of understanding, service contract), the breach may also constitute grounds for termination of the cooperation. Finally, the SN and in particular the Monitoring and Evaluation Manager, the PSEA Reporting Person and the Complaint Handling Committee, must inform relevant donors as defined in the signed project/grants agreements.

2. Necessary Steps

a) Initial assessment of the SHEA report

Within 2 days of receiving the SHEA report, the Committee will complete an initial assessment of the report to determine whether an investigation is warranted. An initial assessment includes:

- determining whether the alleged facts, if proven true, would amount to misconduct.
- establishing whether there is a reasonable likelihood that an investigation could reveal sufficient evidence to prove or refute the allegations.

The initial assessment has four possible outcomes:

Option 1: an investigation is opened. If appropriate, Committee informs the source of the complaint about the decision to open an investigation. No one else should be informed about the investigation, otherwise it might put the investigation at risk.

Option 2: the case is referred to a different organisation for their investigation. This happens when the initial assessment reveals that misconduct is possible, but a different organisation is responsible for the alleged perpetrator's behaviour and therefore they need to investigate.

Option 3: the case is referred to a different team within SN. This can be a solution if the alleged behaviour does not amount to misconduct, or if it is impossible to investigate without putting the victim at serious risk. However, the victim may still need assistance from other relevant colleagues.

Option 4: the case is closed, and no investigation is opened. This is rare in SEA cases and only possible under exceptional circumstances, e.g., when it seems impossible to find information about the alleged incident or when the victim denies consent for all possible investigative steps, with or without their participation.

b) The administrative investigation process

When an investigation procedure is initiated then the Committee must follow four steps.

Step 1 Planning

The Committee has the duty to prepare an Investigation Work Plan, which will include the a) description of the allegation (when did it allegedly happen, who was involved, when and how), b) identification of the rules, regulations and standards of conduct that may have been violated by the alleged misconduct, c) identification of the subject of the complaint and d) an outline of the investigation process (witnesses to be interviewed, documents to be obtained, timeline etc.).

Step 2 Gathering evidence

A crucial step in any fact-finding exercise is to gather all relevant information. Information is considered relevant when it substantiates or refutes the allegations being investigated. In case of a SEA allegation, basic facts need to be established first: names and contact details of victims, witnesses and the alleged perpetrator, the time and place of the incident any evidence of physical harm.

Interviews are conducted by the below order:

- a) The complainant, if different from the victim must be invited first to an interview (or provide a written answer to the questions asked by the Complaint Handling Committee, in case an oral interview is not possible).
- b) The victim
- c) Relevant witnesses suggested by the victim
- d) Other relevant witnesses
- e) The alleged perpetrator
- f) Relevant witnesses suggested by the alleged perpetrator.

It should be noted that sexual harassment, exploitation, and abuse, in whatever form, usually occur away from the eyes of the world and therefore it is difficult to have evidence. A person can make a complaint even if he has no objective evidence beyond his own experience.

In the case of people who are unable to report themselves (e.g. people with difficulty expressing themselves or physical impairments/cognitive deficits), the Committee must seek the assistance of specialists inside and outside the organization.

Step 3 Making the analysis

In the “Analysis” phase, the Committee will consider and evaluate all information gathered.

Step 4 Investigation report

The conclusion is the Investigation Report. It presents all facts established during the investigation (the Investigation Findings), Committee’s analysis of these facts, and the conclusion:

If misconduct is substantiated – investigation report.

If misconduct is not substantiated – case closure report.

c) Final Decision

The Investigation Report is an objective account of the facts established. It should be impartial and objective, concise, clear, and complete.

The report should include the following information:

1. The background/ summary of the complaint
2. SN individuals implicated
3. Applicable rules and regulations
4. Methodology (including list of witnesses and subjects interviewed, document evidence collected, impediments to the investigation, protection measures implemented etc)
5. Investigation findings. Presentation of all evidence collected (facts only)
6. Analysis of the findings/assessment of the evidence gathered
7. Investigation conclusion/relation between allegations and the applicable rules and regulations.

The investigation report shall be submitted to the General Manager, Deputy General Manager, the Regional Director of Northern Greece and the Finance and HR Director (Management team).

The Management team meets within 72 hours and after studying the report, determines the necessary measures. The final decision can include corrective and remedial action, suspension, or termination. Corrective or remedial action may include, but not limited to: implementation monitoring, or mandatory capacity building and training. . In case the violation of SEA also constitutes a violation of national law, the authorities are informed by the Organisation as provided by the relevant legal framework.

The final decision will be communicated in writing to the Board of Directors by the General Manager. The decision must be notified to the complainant and subject within 2 days. Both parties will be informed that the decision is final and there is no instance of appeal.

The Management team coordinates the implementation of the measures and their assignment to other persons of the organization, if deemed necessary, safeguarding confidentiality and the safety of the parties involved.

False or malicious reports

False or malicious reports related to sexual harassment, exploitation and abuse are extremely rare.

However, a member of SN staff who is found to have knowingly made a false complaint is subject to disciplinary sanctions that may even lead to termination of the employment relationship.

In cases where an SN staff member raises a concern about another SN staff member, as long as there is no malicious intent, no criminal charges will be brought against the person raising the concern or writing the report, and measures will be taken to protect the employee who highlights the incident (e.g. protection from possible hostile treatment by the affected colleague, especially if the latter is in a higher hierarchical position in the Organisation). Members of staff take responsibility for raising concerns and reporting in good faith, without malicious intent and with no other objective than to ensure that the affected person is protected from danger, harm, and abuse.

Whistleblowing protection

The Organisation encourages employees, partners, and beneficiaries to report incidents of sexual harassment, exploitation and abuse and provides multiple and safe reporting channels ensuring anonymity and confidentiality. Additionally, the Organisation take all the necessary measures to protect complainants from reprisals, treat all parties to an investigation in a fair and equitable manner and take corrective and disciplinary actions if wrongdoing is discovered.

9. Data collection, processing, and storage

All SN individuals involved in the collection and processing of data relating to beneficiary persons must ensure that appropriate procedures are followed for their safe keeping, in accordance with the provisions of national legislation on the protection of natural persons about the processing of personal data. Given the personal nature of such data, and due to the sensitive nature of many data processed by SN programs (e.g. psychosocial protection programs where victims of sexual harassment / exploitation / abuse may be served), the design of each program details the ways of additional protection of their data. For example, incidents of sexual harassment/exploitation/abuse can only be recorded using under a pseudonym or/and a reporting file number.

Those involved in the handling of data related to potential, actual or suspected violations of SN's Sexual Harassment, Exploitation and Abuse Prevention Policy take all necessary measures to protect the personal data of the individuals involved and other persons involved (e.g., the person who filed the report). All information should be kept strictly confidential and secure, and access to it should be provided for information purposes only, on a need-to-know basis, and as defined by the CRFM. The same principle applies to any electronic database that can choose to use SN.

Specifically, for the consolidation of the information related to PSHEA complaints a password-protected database is set up. All information is saved in a file with restricted access to the Management team and the PSHEA Focal Point. Hard copies of PSHEA reports are kept in a locked cabinet.

10. Accountability, monitoring & evaluation (M&D) and review of this policy

All SN employees and all those working for or on behalf of SN have the responsibility to ensure that beneficiaries are protected from any kind of exploitation, harm, or abuse. All suspected violations of PSHEA must be reported in accordance with the procedures outlined in this document and no person should work with the assumption that someone else is responsible for reporting them.



This is our common ground

All SN employees and all those who work for or on behalf of SN always remain accountable, primarily to the SN beneficiaries, whom the organization is committed to protecting, but also to donors and the Greek society within which SN operates. SN's philosophy and values must always be reflected in practice.

This policy will be mandatorily reviewed every 5 years, but also as often as required on an ad hoc basis, to remain relevant to the context and reflect any significant changes in relevant national legislation, SN's strategic priorities, programme management cycle, or wider humanitarian field.

11. Support and Security

The PSHEA Focal Point and the Complaints Handling Committee are responsible for the Support and Security of the survivors/complainants. Support is provided to survivors/complainants regardless of whether a formal procedure (e.g. investigation) has been initiated. Support is also ensured, where appropriate, to those involved in an incident management process, recognising the impact of this process, for example, on witnesses and those accused of inappropriate or harmful behaviour. Support may include specialised psychosocial support, medical support, legal support and/or access to other specialised and appropriate support as needed.

Survivors and complainants can choose if and when they wish to receive the available support options. According to Annex, the individuals involved can seek support either from the organization itself or from other organizations and bodies.

ANNEX I

Managing complex reports on issues related to Sexual Harassment, Exploitation, Abuse and Safeguarding:

Type of concern	Confrontation
Complaint about a staff member in a partner organisation	Concerns about a staff member of a partner organisation should be reported to the PSEA focal point. The focal point submits a relevant report to the collaborating entity, after the information and the required consent from the General Manager and cooperates with him/her in order to ensure the fastest and appropriate treatment of the issue. This can be done either through an internal process of the partner or through a joint process agreed between the SN and the partner, ensuring that the report receives due attention. In case the cooperating entity does not respond and does not take any measures, SN should consider terminating the cooperation.
PSEA complaint in relation to a child	The CRFM mechanism is activated, and all necessary actions are followed, as mentioned in the Child Protection Policy and PSHEA Policy., by creating a Complaint Handling Committee and informing SN's Management.
Accusation against the General Manager or a member of the Management team or the Board of Directors	Concerns involving the General Manager or a member of the Management team or the Board of Directors of the organization should be brought to the attention of the Board of Directors (excluding the member accused), while the investigation of the complaint is undertaken by the Complaints Handling Committee.
Accusation against a Person Responsible for Sexual Harassment, Exploitation, Abuse and Safeguarding	Concerns involving a Person Responsible for Sexual Harassment, Exploitation, Abuse and Safeguarding should be brought to the attention of the General Manager, who decides how to manage the incident appropriately. The Board of Directors is informed on the decisions made upon investigation and final course of action.



This is our common ground



Annex II: Referral Pathway for Gender-Based Violence

Northern Greece – Location: Urban Thessaloniki

DISCLOSURE*
to community member, service provider, or external actor

LIFE-THREATENING EMERGENCY*

NOT LIFE-THREATENING EMERGENCY*

REPORT TO AUTHORITIES

Authority: Hellenic Police
Weekday/Weekends: 24/7
 📍: Police
 ☎: 100
 ✉: 100 (SMS)

Authority: Office for Addressing Domestic Violence
Weekday/Weekends: 24/7
 📍: Police Station of Lefkos Pyrgos, Aristotelous 18
 ☎: 2310388043/ 2310303341
 ✉: adthe-tgagen@astynomia.gr

IMMEDIATE RESPONSE

1. Provide **information** on available services.
2. If agreed by survivor, obtain **informed consent*** and **refer***.
3. **Accompany*** survivor to access services if requested.
4. For survivors of sexual violence, ensure immediate access to **medical care**.
5. Prioritize the **safety, confidentiality***, and wishes of the survivor as well as your own safety.

CONTACT MEDICAL SERVICE PROVIDER

Ambulance: 166, [Hospitals on Duty](#)

Nearest hospital/PHC equipped to respond to rape (CMR*-equipped):
 Hospital/PHC: AHEPA Hospital (Department of Infectious Diseases)
 Address: Kyriakidi 1
 Phone: 2310993271

REFER TO THE CASE MANAGEMENT AGENCY* ONLY WITH INFORMED CONSENT* OF SURVIVOR
*Always use "GBV Referral Form. **"*

Case management agency* receiving referrals for GBV cases – adults
Gender(s) covered by organization: X Female X Male X Other
Organization: DIOTIMA
Mon-Fri, 09:00-17.00
Weekend/after-hours
 📍: Myrto Prodromidou 📞: **GAP**
 ☎: 2310534445/ 6975872416 (WhatsApp: Farsi/English) ☎: **GAP**
 ✉: urban.thessaloniki.diotima@gmail.com ✉: **GAP**

Case management agency* receiving referrals for GBV cases – minors
Organization: DIOTIMA
Age range(s) covered by organization: <12 13-17 X Other: 16+
Mon-Fri, 09:00-17.00 **Weekend/after-hours**
 📍: Myrto Prodromidou 📞: **GAP**
 ☎: 2310534445/ 6975872416 ☎: **GAP**
 ✉: urban.thessaloniki.diotima@gmail.com ✉: **GAP**

***Check CP referral pathways for specific services to UASC and accompanied children of all ages.**

UNHCR GBV focal point for location
Mon-Fri, 9:00-17:30 **Weekend/after-hours**
 📍: Christina Katsoumpina/Stefania Stefanovichj 📞: **GAP**
 ☎: 6948720714/ 6946159970 ☎: **GAP**
 ✉: katsoumc@unhcr.org & stefanov@unhcr.org ✉: **GAP**



This is our common ground

FOR REFERENCE OF CASE MANAGEMENT AGENCY ONLY

ONWARD REFERRAL TO SPECIALIZED SERVICES AS NEEDED (1)

LEGAL AID (INCL. LEGAL INFO)

Organization: DIOTIMA

Mon-Fri, 9:00-17:00

Myrto Prodromidou
2310534445/ 6975872416
urban.thessaloniki.diotima@gmail.com

Weekend/after-hours

GAP
GAP
GAP

Organization: Women's Counselling Center

Mon-Fri, 7:00-15:00

2310 528984-8
thessaloniki@isotita.gr

Weekend/after-hour

GAP
GAP

Organization: GCR

Mon-Fri, 9:00-16:00

2310250045, 2311821677
gcr1@gcr.gr

Weekend/after-hours

GAP
GAP
GAP

Organization: Irida Women's Center

Mon-Thu, 9:30-17:30, Fri, 9:30-14:30

Weekend/after-hours

Sarah (lawyer)
2311296392, 6907289836
irida@iridacenter.org

GAP
GAP
GAP

LEGAL REP. (CRIMINAL/CIVIL)

Organization: DIOTIMA

Mon-Fri, 9:00-17:00

Coordinator
2310534445/ 6975872416
urban.thessaloniki.diotima@gmail.com

Weekend/after-hours

GAP
GAP
GAP

Organization: GCR

Mon-Fri, 9:00-16.00

2310250045, 2311821677
gcr1@gcr.gr

Weekend/after-hours

GAP
GAP
GAP

Organization: Irida Women's Center

Mon-Thu, 9:30-17:30, Fri, 9:30-14:30

Weekend/after-hours

Sarah (lawyer)
2311296392, 6907289836
irida@iridacenter.org

GAP
GAP
GAP

SHELTER (SHORT TERM)

Organization: *DIOTIMA

Mon-Fri, 9:00-17:00

Myrto Prodromidou
2310534445/ 6975872416
urban.thessaloniki.diotima@gmail.com

Weekend/after-hour

GAP
GAP
GAP

Organization: *Irida Women's Center

Mon-Thu, 9:30-17:30, Fri, 9:30-14:30

Weekend/after-hours

Karagianni
2311296392, 6907289836
irida@iridacenter.org
Effie Karagianni
6947642659
irida@iridacenter.org

*Both organizations have a very limited capacity to offer emergency accommodation. Each request should be discussed with focal points.

SHELTER (MID-LONG TERM)

Organization: *Women's Counselling Center

Mon-Fri, 7:00-15:00

2310 528984-8
thessaloniki@isotita.gr

Weekend/after-hour

GAP
GAP

*The Women's Counselling Center is responsible for referrals to the Municipal Shelters.

Organization: EKKA Shelter

Mon-Fri, 7:30-15:30

2310471101, 2313313929-32

kksfinika@thess.ekka.org.gr

Weekend/after-hours

GAP
GAP

Organization: Mother Teresa

Mon-Sun, 8:00-12:00 & 16:00-18.30

2310512755
G. Tsontou 23, http://ierapostoliagapis.org/

Organization: Arsis- Social Service for Vulnerable Women

Mon-Fri, time

Antigoni Alexiou
6978807814
pss.women@arsis.gr

Weekend/after-hours

GAP
GAP



This is our common ground

ONWARD REFERRAL TO SPECIALIZED SERVICES AS NEEDED (2)

HEALTH (MENTAL HEALTH)

Organization: EOPYY (Interpretation needed)
Weekday/Weekends: 24/7
 ☎: 14900 ☎:14900

Organization: Psychiatric Hospital of Thessaloniki
Mon-Fri, 8:00-14:00 **Weekend/after-hour**
 ☎: 2313324320 & 2313324362 ☎: **GAP**
 ✉: Lagkada 196, poliths@psychothes.gr ✉: **GAP**

Organization: Women’s Counselling Center
Mon-Fri, 7:00-15:00 **Weekend/after-hour**
 ☎: 2310528984-8 ☎: **GAP**
 ✉: thessaloniki@isotita.gr ✉: **GAP**

Organization: MdM
Mon-Fri, 8:00-16:00 **Weekend/after-hours**
 📍: Thanos Roussos ☎: **GAP**
 ☎: 2310566641 ☎: **GAP**
 ✉: Ptolemeon 29A ✉: **GAP**

Organization: PRAKIS Polyclinic
Mon-Thu, 9:00-17:00, Fri, 9:00-15:00 **Weekend/after-hours**
 ☎: 2310556145 ☎: **GAP**
 ✉: a.skordas@praksis.gr, Arkadioupoleos 1 & ✉: **GAP**

HEALTH (NON-MENTAL HEALTH)

Organization: Hospitals on Duty
Weekday/Weekends: 24/7
 ☎: 1535 & 14900 PEDY ☎: 1535 &14900 PEDY

Organization: MdM
Mon-Fri, 8:00-16:00
 📍: Thanos Roussos
 ☎: 2310566641
 ✉: Ptolemeon 29A

Organization: Thess Checkpoint
Mon, 16:00-20:00, Tue-Fri, 12:00-20:00 **Sat, 12:00-16:00**
 ☎: 2310 282 284 (for appointments) ☎: 2310 282 284
 ✉: Egnatias 95 ✉: Egnatias 95

Organization: PRAKIS (STI testing)
Mon-Thu, 9:00-16:00, Fri, 9:00-15:00
 ☎: 2310556145 (for appointments)
 ✉: n.papanikolaou@praksis.gr, Arkadioupoleos 1 & Ag. Dimitriou

Organization: PRAKIS Polyclinic
Mon-Thu, 9:00-17:00, Fri, 9:00-15:00
 ☎: 2310556145 (for appointments)
 ✉: a.skordas@praksis.gr, Arkadioupoleos 1 & Ag. Dimitriou

PSYCHOSOCIAL SUPPORT

Organization: DIOTIMA
Mon-Fri, 9:00-17:00 **Weekend/after-hours**
 📍: Coordinator ☎: **GAP**
 ☎: 2310534445/ 6975872416 ☎: **GAP**
 ✉: urban.thessaloniki.diotima@gmail.com ✉: **GAP**

Organization: Women’s Counselling Center
Mon-Fri, 7:00-15:00 **Weekend/after-hour**
 ☎: 2310528984-8 ☎: **GAP**
 ✉: thessaloniki@isotita.gr ✉: **GAP**

Organization: 15900 (free)-SOS Helpline
Greek 24/7
Mon-Thu 9:00-11 (Arabic), Tue-Fri, 9:00-11:00 (Farsi)
 ☎: 15900
 ✉: sos15900@isotita.gr

Organization: KEM
Mon-Fri, 8:30-14:00 **Weekend/after-hours**
 ☎: **GAP**
 ✉: **GAP**
 ☎: 2313318646 (psychologist)
 2313318647 (social worker)
 2313318623 (lawyer)
 ✉: Monastiriou 93B

OTHER (INCL. EDU., CASH, LIV.)

Organization: KEM (inclusion)

Mon-Fri, 8:30-14:00

Weekend/after-hours

☎: 2313318647 (social worker)
2313318623 (lawyer)

✉: Monastiriou 93B

☎: **GAP**

✉: **GAP**

Organization: Irida Women's Center (education)

Mon-Thu, 9:30-17:30, Fri, 9:30-14:30

Weekend/after-hours

☎: 2311296392, 6907289836

✉: irida@iridacenter.org

👤: **GAP**

☎: **GAP**

✉: **GAP**

Organization: Women's Counselling Center

Mon-Fri, 7:00-15:00

Weekend/after-hour

☎: 2310 528984-8

✉: thessaloniki@isotita.gr

☎: **GAP**

✉: **GAP**

Organization: Blue Refugee Center (Employability)

Mon-Fri, 9:00-19:00

Weekend/after-hours

👤: Solidarity Now

☎: 2310555266

✉: I.Koletti 25D

👤: **GAP**

☎: **GAP**

✉: **GAP**

Organization: Elpida Home (employability, education, inclusion)

Mon-Fri, 9:00-17:00

Weekend/after-hours

👤: Jumana Abo Oxa

☎: 6943685856, 2310530026

✉: Mprantouna 5, info@elipdahome.org

👤: **GAP**

☎: **GAP**

✉: **GAP**

Organization: Arsis- Social Services of Vulnerable Women (job counselling/ language classes)

Mon-Fri, time

Weekend/after-hours

👤: Antigoni Alexiou

☎: 6978807814

✉: pss.women@arsis.gr

👤:

☎:

✉:

SERVICES FOR SURVIVORS OF TRAFFICKING

Authority: Hellenic Police
Weekday/Weekends: 24/7

👮: Police
☎: 100
✉: 100 (SMS)

Authority: Hellenic Police- Antitrafficking Police Department
Weekday/Weekends: 24/7

👮: Lieutenant Georgiadis Vasileios
☎: 2310388372
2310388373
✉: trafficking.thess@hellenicpolice.gr

Organization: A21

Weekday/Weekends: 24/7

☎: 1109 (tele-interpretation in more than 200 languages)

Organization: National Referral Mechanism for the Protection of Victims of Trafficking

Mon-Fri, 7:30-15:00

☎: 213203977
✉: ema@ekka.org.gr

Weekend/after-hours

24/7
👮: EKKA Emergency Helpline
☎: 197

***In case the individual is also a GBV survivor, please refer to the above services.**



This is our common ground



Annex III: Referral Pathway for Gender-Based Violence

Central Greece – Location: Urban Athens

DISCLOSURE*

to community member, service provider, or external actor

LIFE-THREATENING EMERGENCY*

NOT LIFE-THREATENING EMERGENCY*

REPORT TO AUTHORITIES

Authority: Hellenic Police
Weekday/Weekends: 24/7
☎: Police
📞: 100
✉: 100 (SMS)

Authority: Office for Addressing Domestic Violence
Weekday/Weekends: 24/7
☎: Police Station
📞: 2310388043/ 2310303341
✉: adthe-tgagen@astynomia.gr

CONTACT MEDICAL SERVICE PROVIDER

Ambulance: 166, [Hospitals on Duty](#)
Nearest hospital/PHC equipped to respond to rape (CMR*-equipped):
Hospital/PHC: Hospital on duty
Address:
Phone: 166

IMMEDIATE RESPONSE

6. Provide **information** on available services.
7. If agreed by survivor, obtain **informed consent*** and refer*.
8. **Accompany*** survivor to access services if requested.
9. For survivors of sexual violence, ensure immediate access to **medical care**.
10. Prioritize the **safety, confidentiality***, and wishes of the survivor as well as your own safety.

REFER TO THE CASE MANAGEMENT AGENCY* ONLY WITH INFORMED CONSENT* OF SURVIVOR

Always use "GBV Referral Form. **"

Case management agency* receiving referrals for GBV cases – **adults** (Gender(s) covered by organization: X Female X Male X Other)
Organization: DIOTIMA
Mon-Fri, 09:00-17.00
Weekend/after-hours

☎: employee on call
☎: WhatsApp/Viber (farsi) 6988587846, (eng and fr) 6988587809, (arabic) 6988528460, (Ukrainian, Russian) 6907590424 ☎: **2103244380**
✉: diotima@otenet.gr, helpdesk.diotima@gmail.com ✉: Available chat Mon-Fri 10.00 -16.00 at <https://diotima.org.gr/helpdesk-live-chat/>

Case management agency* receiving referrals for GBV cases – **minors**

Organization: Hamogelo tou Paidiou
Age range(s) covered by organization: <12 X 13-17 X Other: 16+ X
Mon – Sun 24/7 **Weekend/after-hours**
☎: GAP
☎: 1056 ☎: GAP
✉: ✉: GAP

Organization: Legal Guardian (for unaccompanied children, unless is involved to the SEA case)
Age range(s) covered by organization: <12 13-17 X Other: 16+
Mon-Fri, 09:00-17.00 **Weekend/after-hours**
☎: GAP
☎: GAP ☎: GAP
✉: GAP ✉: GAP

NATIONAL LINE FOR THE UNACCOMPANIED MINORS* 24/7

☎: 0030-2132128888 ☎: & 0030-6942773030 μέσω Whatsapp ή Viber
✉: GAP ✉: GAP

*Check CP referral pathways for specific services to UASC and accompanied children of all age

ONWARD REFERRAL TO SPECIALIZED SERVICES AS NEEDED (1)

LEGAL AID (INCL. LEGAL INFO)

Organization: DIOTIMA
Mon-Fri, 10:00-18:00 Weekend/after-hours

👤: **GAP**
 ☎: 2103244380 ☎: **GAP**
 ✉: helpdesk.diotima@gmail.com ✉: **GAP**

Organization: Women's Counselling Center of Athens
Mon-Fri, 8.30 – 16.30 Weekend/after-hour

☎: 2103317305-6 ☎: **GAP**
 ✉: isotita4@otenet.gr ✉: **GAP**

Organization: Women's Counselling Center Polykentro - Omonoia
Mon-Fri, 09.00 – 17.00 Weekend/after-hour

☎: 2105202800 ☎: **GAP**
 ✉: polykentro@isotita.gr ✉: **GAP**

LEGAL REP. (CRIMINAL/CIVIL)

Organization: DIOTIMA
Mon-Fri, 10:00-18:00 Weekend/after-hours

👤: **GAP**
 ☎: 2103244380 ☎: **GAP**
 ✉: helpdesk.diotima@gmail.com ✉: **GAP**

Organization: Women's Counselling Center of Athens
Mon-Fri, 8.30 – 16.30 Weekend/after-hour

☎: 2103317305-6 ☎: **GAP**
 ✉: isotita4@otenet.gr ✉: **GAP**

Organization: Women's Counselling Center Polykentro - Omonoia
Mon-Fri, 09.00 – 17.00 Weekend/after-hour

☎: 2105202800 ☎: **GAP**
 ✉: polykentro@isotita.gr ✉: **GAP**

Organization: Center for Combating GBV and Multiple Discrimination, Municipality of Athens (legal counselling)

Mon-Fri, 9:00-17:00 Weekend/after-hours
 👤: **GAP**
 ☎: 2108625355 / 2108625858 ☎: **GAP**

SHELTER (SHORT TERM)

Organization: Women's Counselling Center of Athens
Mon-Fri, 8.30 – 16.30 Weekend/after-hour

☎: 2103317305-6 ☎: **GAP**
 ✉: isotita4@otenet.gr ✉: **GAP**

Organization: Women's Counselling Center Polykentro - Omonoia
Mon-Fri, 09.00 – 17.00 Weekend/after-hour

☎: 2105202800 ☎: **GAP**
 ✉: polykentro@isotita.gr ✉: **GAP**

Organization: *Safe Place International
Mon-Thu, 9:30-17:30, Fri, 9:30-14:30

Weekend/after-hours 👤:

✉: "augustine@safeplaceinternational.org // info@safeplaceinternational.org"

* organizations have a very limited capacity to offer emergency accommodation. Each request should be discussed with focal points.

SHELTER (MID-LONG TERM)

Organization: Women's Counselling Center of Athens
Mon-Fri, 8.30 – 16.30 Weekend/after-hour

☎: 2103317305-6 ☎: **GAP**
 ✉: isotita4@otenet.gr ✉: **GAP**

Organization: Women's Counselling Center Polykentro - Omonoia
Mon-Fri, 09.00 – 17.00 Weekend/after-hour

☎: 2105202800 ☎: **GAP**
 ✉: polykentro@isotita.gr ✉: **GAP**

Organization: *Safe Place International
Mon-Thu, 9:30-17:30, Fri, 9:30-14:30

Weekend/after-hours 👤: 👤:

✉: "augustine@safeplaceinternational.org // info@safeplaceinternational.org"

FOR ALL THE ABOVE ALSO:

15900 NATIONAL HELPLINE 24/7



This is our common ground

ONWARD REFERRAL TO SPECIALIZED SERVICES AS NEEDED (2)

HEALTH (MENTAL HEALTH)

Organization: EOPYY (Interpretation needed)
 Weekday/Weekends: 24/7
 ☎: 14900 ☎:14900

Organization: Hospitals on Duty
 24/7
<https://www.moh.gov.gr/articles/citizen/efhmeries-nosokomeiwn/68-efhmeries-nosokomeiwn-attikhs>

Organization: DIOTIMA
 Mon-Fri, 10:00-18:00 Weekend/after-hours
 👤: ☎: 2103244380 ☎: GAP
 ✉: helpdesk.diotima@gmail.com ✉: GAP

Organization: Women’s Counselling Center of Athens
 Mon-Fri, 8.30 – 16.30 Weekend/after-hour
 ☎: 2103317305-6 ☎: GAP
 ✉: isotita4@otenet.gr ✉: GAP

Organization: Women’s Counselling Center Polykentro - Omonoia
 Mon-Fri, 09.00 – 17.00 Weekend/after-hour
 ☎: 2105202800 ☎: GAP
 ✉: polykentro@isotita.gr ✉: GAP

Organization: Center for Combating GBV and Multiple Discrimination, Municipality of Athens (legal counselling)
 Mon-Fri, 9:00-17:00 Weekend/after-hours
 👤: ☎: 2108625355 / 2108625858 ☎: GAP

Organization: Babel
 Mon-Thu, 9:00-17:00, Fri, 9:00-17:00 Weekend/after-hours
 ☎: 2108616280, 2108616266 ☎: GAP
 ✉: babel@syn-eirmos.gr ✉: Drossopoulou 72, Athens

Organization: *Dipla Sou (LGBTQI+)
 Mon-Fri, 10:00-20:00 Weekend/after-hours
 ☎: 11528 ☎: GAP
 ✉: diplasou@11528.gr ✉: GAP

HEALTH (NON-MENTAL HEALTH)

Organization: Hospitals on Duty
 24/7
<https://www.moh.gov.gr/articles/citizen/efhmeries-nosokomeiwn/68-efhmeries-nosokomeiwn-attikhs>
 ☎: 1535 & 14900 PEDY ☎: 1535 &14900 PEDY

Organization: MdM
 Mon-Fri, 8:00-16:00
 👤: ☎: 2103213485
 ✉: Sappous 12, Athens

Organization: Ath Checkpoint
 Tue – Sat : 12.00 -20.00
 ☎: 2103310400 (for appointments)
 ✉: Pittaki 4, Monastiraki, Athens

Organization: PRAKIS (STI testing)
 Mon-Thu, 9:00-16:00, Fri, 9:00-15:00
 ☎: 2310556145 (for appointments)
 ✉: n.papanikolaou@praksis.gr, Arkadioupoleos 1 & Ag. Dimitriou

Organization: PRAKIS Polyclinic
 Mon-Thu, 9:00-17:00, Fri, 9:00-15:00
 ☎: 2310556145 (for appointments)
 ✉: a.skordas@praksis.gr, Arkadioupoleos 1 & Ag. Dimitriou

PSYCHOSOCIAL SUPPORT

Organization: Melissa
 Mon-Fri, 9:00-20:00 Weekend/after-hours
 👤: Coordinator ☎: 210 821 8486 ☎: GAP
 ✉: info@melissanetwork.org ✉: 18, Feron, Victoria Sq, Athens

Organization: DIOTIMA
 Mon-Fri, 10:00-18:00 Weekend/after-hours
 👤: ☎: 2103244380 ☎: GAP
 ✉: helpdesk.diotima@gmail.com ✉: GAP

Organization: Women’s Counselling Center of Athens
 Mon-Fri, 8.30 – 16.30 Weekend/after-hour
 ☎: 2103317305-6 ☎: GAP
 ✉: isotita4@otenet.gr ✉: GAP

Organization: Women’s Counselling Center Polykentro - Omonoia
 Mon-Fri, 09.00 – 17.00 Weekend/after-hour
 ☎: 2105202800 ☎: GAP
 ✉: polykentro@isotita.gr ✉: GAP

Organization: Center for Combating GBV and Multiple Discrimination, Municipality of Athens (legal counselling)
 Mon-Fri, 9:00-17:00 Weekend/after-hours
 👤: ☎: 2108625355 / 2108625858 ☎: GAP

Organization: 15900 (free)-SOS Helpline
 Greek 24/7
 Mon-Thu 9:00-11 (Arabic), Tue-Fri, 9:00-11:00 (Farsi)
 ☎: 15900
 ✉: sos15900@isotita.gr

ONWARD REFERRAL TO SPECIALIZED SERVICES AS NEEDED (3)

OTHER (INCL. EDU., CASH, LIV.)

1

Organization: Seeds of Humanity (empowerment workshops)

👤: GAP
☎: 2130445630 **📞: GAP**
✉: <https://www.seedsofhumanity.org/contact> **✉: GAP**

Organization: DIOTIMA
Mon-Fri, 10:00-18:00 Weekend/after-hours

👤: **👤: GAP**
☎: 2103244380 **☎: GAP**
✉: helpdesk.diotima@gmail.com **✉: GAP**

Organization: Women's Counselling Center of Athens
Mon-Fri, 8.30 – 16.30 Weekend/after-hour

👤: **👤: GAP**
☎: 2103317305-6 **☎: GAP**
✉: isotita4@otenet.gr **✉: GAP**

Organization: Women's Counselling Center Polykentro - Omonoia
Mon-Fri, 09.00 – 17.00 Weekend/after-hour

👤: **👤: GAP**
☎: 2105202800 **☎: GAP**
✉: polykentro@isotita.gr **✉: GAP**

Organization: Center for Combating GBV and Multiple Discrimination, Municipality of Athens (legal counselling)

Mon-Fri, 9:00-17:00 Weekend/after-hours

👤: **👤: GAP**
☎: 2108625355 / 2108625858 **☎: GAP**

*The above focus more on empowerment of survivors. For further services check the link.

SERVICES FOR SURVIVORS OF TRAFFICKING

Authority: Hellenic Police

Weekday/Weekends: 24/7

☎: Police

☎: 100

✉: 100 (SMS)

Authority: Hellenic Police- Antitrafficking Police Department

Weekday/Weekends: 24/7

☎: Lieutenant Georgiadis Vasileios

☎: 2106476826 - 825

✉:

Organization: A21

Weekday/Weekends: 24/7

☎: 1109 (tele-interpretation in more than 200 languages)

Organization: National Referral Mechanism for the Protection of Victims of Trafficking

Mon-Fri, 7:30-15:00

☎: 213203977

✉: ema@ekka.org.gr

Weekend/after-hours

24/7

☎: EKKA Emergency Helpline

☎: 197

***In case the individual is also a GBV survivor, please refer to the above services.**

free EMERGENCY numbers



112
EU-wide



166
AMBULANCE



199
FIRE



100
POLICE

if you are a victim or you know a victim of human trafficking...

Human Trafficking
Resource Line

1109 (Multi-language)

if you are a woman/child experiencing domestic violence or you know someone who is ...

General Secretariat
for Gender Equality
/ E.K.K.A

15900 - Women
1107 - Children

for psychological support for adults / children and teenagers

E.K.K.A. /
Smile of a Child

197 – Adults
1056 – Children

if you, or if you know someone who you know is thinking of ending their life...

Klimaka

1018

if you want to report a racist incident or learn about your rights

Police anti-racist
department

11414

homeless children or living in precarious conditions

National Emergency Response
Mechanism
24/7

2132128888
6942773030 (WhatsApp& Viber)
Arabic, Farsi, Dari, Urdu, Punjabi,
Bengali (others based on
availability)



This is our common ground

ANNEX IV: REPORTING FORM

SN Reporting Form for Sexual Harassment Exploitation and Abuse	
Date of complaint:	File number (given by the PSHEA Focal Point):
Information about the complainant	
Name (optional):	Surname (optional):
Phone number:	Email:
Type (please select as appropriate): <input type="checkbox"/> SN Employee <input type="checkbox"/> Volunteer or intern <input type="checkbox"/> Beneficiary <input type="checkbox"/> Board member	<input type="checkbox"/> Supplier <input type="checkbox"/> Partner staff <input type="checkbox"/> Donor <input type="checkbox"/> Other
How did the complainant find out about the incident <input type="checkbox"/> He/she is the victim <input type="checkbox"/> He/she witness it <input type="checkbox"/> He/she was told about it	
If anonymous: Please explain the reasons for not submitting your contact information. If possible, submit an email or phone number where you can be contacted for further information that might be needed for the investigation.	
Information about the incident (Please describe the suspicion or incidence of PSHEA. Use the complainant's words verbatim and ask questions to get as much important information as possible. At a minimum, the complainant should indicate who, what, how, where and when the complaint is about)	
Date and time (when):	Location (where):
Full name of the victim (who):	Gender of the victim: <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Other
Description of the incident (what/how):	
Information about the alleged perpetrator	
Full name:	Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Other
Organization for which he/she works:	Position:
Actions taken so far	
Please describe any action taken to ensure immediate needs or safety concerns for the complainant or victim:	
If the survivor has been referred to an organization for support, please describe:	

Important

Gathering information at the time of reporting is a crucial element of the process. The report should be objective and precise, focusing on the facts and relevant information that will help when it is time to act.

- When a child discloses maltreatment or abuse, make sure to ask the questions needed to have a clear understanding of what the child is saying and to ensure the security and welfare of the child. **DO NOT SEARCH FURTHER.**
- Inform the person that all information given in the complaint will remain confidential.
- Be receptive of the complainant and listen to what he or she has to say.
- Write a clear record of what is said by the complainant in his own words. Take the time to cross-check with the complainant that you understand everything before writing.
- Allow the complainant to read what you have written. If the complainant is illiterate, read out the text to ensure that what you have written is what he or she meant. Ask the person if he or she is satisfied with what you have written. If they are not, correct the text with them.

