

Child Safeguarding Policy

DELIVERABLE D.1.2 INTERNAL POLICIES (SOPS)
WP LEAD: GREEK COUNCIL FOR REFUGEES



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Overview Child Safeguarding Principles & Values

This policy establishes the minimum safeguarding standards for all partners, their implementing staff and volunteers involved in the project Power2UAMs. It is based on international child protection frameworks, including the UN Convention on the Rights of the Child (CRC) and the Core Humanitarian Standard (CHS) and the guidelines from Keeping Children Safe <https://www.keepingchildrensafe.global/>.

Our commitment is to ensure the safety, dignity, and well-being of all children engaged in our program activities.

This policy is guided by the following principles:

- **Zero Tolerance:** No form of child abuse, exploitation, or neglect will be tolerated¹.
- **Best Interests of the Child:** All decisions must prioritize the child's safety and well-being.
- **Do no harm:** The principle ensures that all actions and interventions prioritize the safety, dignity, and well-being of children. It requires staff and partners to carefully assess risks and avoid causing physical, emotional, or psychological harm—whether intentionally or unintentionally—through their work. This includes preventing exploitation, abuse, neglect, or any practices that may compromise a child's rights or development.
- **Equal rights:** all children have equal rights to protection and participation throughout the project's activities.
- **Accountability:** All staff and partners share responsibility for safeguarding.
- **Confidentiality:** Sensitive information must be handled with care and shared strictly on a need-to-know basis. Wherever possible, the anonymity of the child and those involved should be preserved to protect their identity, dignity, and safety, particularly during reporting, investigation, and referral processes.

1. Partner Accountability for Safe Recruitment & Background Checks

To ensure safeguarding compliance, partners are responsible for the safe recruitment of their staff and must:

- **Develop/Implement Internal Policies:** Establish background check procedures within their own safeguarding frameworks.
- **Conduct Screening:** Ensure all candidates demonstrate an understanding of child safeguarding.

¹ See appendix 2, Definitions.

- **Require Signed Commitments:** Ensure employees and volunteers sign a Child Safeguarding Code of Conduct.
- **Provide Documentation:** Upon request, partners must demonstrate compliance with these requirements.
- **Inclusion of Volunteers and trainees** in the abovementioned procedures and requirements

2. Risk Assessments & Preventive Measures

Before engaging in any child-related activities, partners should conduct a risk assessment:

- **Identifying Potential Risks:** Assess the likelihood of harm in various settings.
- **Mitigation Strategies:** Implement safeguards such as supervised interactions and clear behavior protocols.
- **Safe Digital Communication:** Establish protocols for online engagement with children.

3. Reporting & Response Protocols

All safeguarding concerns must be reported immediately through a clear and accessible process:

- **Reporting Channels:** Staff and children can report concerns via clear process including addressing an appointed Safeguarding Lead written or verbally, or/ and a confidential email. **Report forms will be also available online in the project’s website in English and French and in the partner’s websites/or social media, also translated in the languages of the majority of the UAMs in the specific localities.**

3.1 Investigation & Action

Allegations will be reviewed promptly, and appropriate actions will be taken.

a. Local /National Level

- Receive the report (verbal, written, anonymous — all are valid).
- Ensure immediate safety of anyone at risk
- Record basic details immediately (who, what, where, when).
- Inform the Safeguarding Focal Point of your organization without delay.
- Preserve evidence (documents, communications, witness names).

b. Initial Assessment (within 24–48 hours)

- Check: Is this a safeguarding issue, a staff misconduct issue, something else?
- Decide whether to escalate to external authorities (e.g., police, child protection services).

- If not an emergency or a legal issue, refer to the Project's Safeguarding Officer through safeguarding@gcr.gr² to act as investigator.

c. Investigation Planning

The Plan will define:

- What needs to be investigated (scope)?
- What evidence is needed (documents, interviews)?
- Who are the witnesses?

Prepare an Investigation Plan which will include:

- Timeline (e.g., finish in 30 days)
- Who will do interviews
- How confidentiality will be protected

d. Evidence Collection and Interviews

- Interview the complainant (child, staff, community member)
- Interview witnesses and the accused person separately.
- Collect physical/documentary evidence if any.
- Take clear notes of each interview (or record, with consent).

Important:

- Be neutral — do not assume guilt or innocence.
- Protect confidentiality throughout the process.

e. Conclusion and Action

Investigator writes a Findings Report summarizing:

- Facts found
- Whether misconduct happened (based on "balance of probabilities" — not criminal standard)
- Recommended next steps (disciplinary action, training, referral to authorities, closure).
- Inform the Advisory Board for the actions

Additionally:

- Feedback is given to the complainant and the accused (at a summary level, protecting confidentiality).
- Lessons learned are documented for future prevention.

² Vasiliki Katrivanou, Coordinator of Social Unit, GCR v.katrivanou@gcr.gr

4. Confidentiality & Data Protection

- **Written Consent of the minor and the legal guardian:** For the participation of unaccompanied minors in any activity of the project (WP2, WP3 & WP4), a prior written consent must be given both by the minor and the legal guardian.
If there is no legal guardian is present or appointed:
 - Seek consent from an authorized representative (e.g., assigned social worker, guardian ad litem, or reception center manager with legal authority).
- Always also get the child's voluntary assent,³ using child-friendly language explaining the purpose of the activities, their rights, and that participation is completely voluntary.
- The content of the written consent includes at minimum, the aim of the activity, the protection of their anonymity during the data sharing process and the aim of data procession.
- Participants have the right to withdraw from an interview or action at any point—during or after participation—without any negative consequences. Their decision will be respected fully.
- If no guardian is assigned yet, and only the child can consent, this must be cleared in writing with your Child Safeguarding Focal Point and noted in your documentation.
- **Secure Storage:** Sensitive safeguarding data must be stored securely with restricted access.
- **Media exposure:** Any photo of minor that will participate in the activities of the project will be taken only after the written consent of the minor and the legal guardian. Photos, videos or media material will be used only for the aim of the project under WP4.
- **Data Sharing Guidelines:** Information will be shared only when necessary, following WHO ethical guidelines. All personal and sensitive data collected during the project will be securely destroyed at the end of the project, in line with ethical standards and the EU General Data Protection Regulation (GDPR). Compliance with GDPR is inherent and obligatory in all project activities, ensuring lawful, fair, and transparent processing of data, as well as the right to access, rectify, or erase personal data.
- For research interviews conducted under WP2, audio recordings will be used solely for transcription and analysis purposes. These recordings will be securely stored and then permanently deleted once they are no longer required for the research.
- In WP3, video recordings produced for dissemination or publication purposes will be handled with explicit, informed consent from participants or their guardians. These recordings will be securely stored and only shared in formats and platforms agreed upon in advance. No identifying content will be used without prior permission, and

³ See Annex III Assent form

any withdrawal of consent will be respected to the extent possible within the scope of dissemination.

5. Implementation & Partner Accountability

- All implementing partners must confirm their agreement to adhere to this safeguarding policy.
 - Implementing Staff, including volunteers, will receive training on the Safeguarding standards and protocols.
 - This policy will be reviewed annually to align with emerging risks and best practices.
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Approval & Endorsement

This policy is approved and endorsed by the consortium and applies to all activities and Work Packages.

Effective Date: 30/4/2025

Next Review Date: 31/5/2026

Annexes

I. Your Voice Matters — Safeguarding Concern Form for Children

We want you to feel safe, respected, and supported. If something is making you feel uncomfortable, unsafe, or upset, you can use this form to let us know.

1. Your Name (optional*):

* Should you wish to stay anonymous because you fear consequences from reporting, we prefer an anonymous report to no report. In this case, please record why you felt compelled to report anonymously.

3. What has happened that you want to talk about?

(Please describe in your own words. You can write as much or as little as you like.)

4. Where did this happen?

5. When did it happen and how long? (If you're not sure, that's okay)

6. Who was involved?

7. How has this made you feel? (Check all that apply)

Worried Scared Sad Angry Confused Embarrassed Violated Were you injured? Something else:

8. Would you like someone to talk to you about this?

Yes, please* I'm not sure No, thank you

* If yes to whom would you like to talk to?

9. Is there anything else you'd like to share?

10. Can we contact you to follow up on this?

Yes No

By phone?

In Person?

Please give this form to a trusted adult they can also help you fill it in.

Or you can send it yourself to safeguarding@gcr.gr

II. Safeguarding Concern Reporting Form

For adults to report a safeguarding concern

1. Your Name:

2. Your Role / Relationship to the child or young person:

3. Date of Concern:

4. Time of Concern (if known):

7. Describe the concern:

(Please describe what you have seen, heard, or been told. Be specific and factual. Include dates, times, and locations if possible.)

8. Was there a disclosure made by the child/young person?

Yes No

If yes, what did they say?

(Use their own words as much as possible)

9. Any visible injuries or signs?

Yes No

If yes, describe or note where on the body:

10. Is there is any sign of or self-reporting on mental effect or trauma?

Yes No Other (please explain)

11. Action taken (if any):

(e.g., who you informed, what support was offered)

12. Have you referred this to the Safeguarding Lead?

Yes – Name of Safeguarding Lead: _____

Not yet

Signature:

—

Date:

—

⚠ Important: Please pass this completed form immediately to your Designated Safeguarding Lead (DSL) .

III. Child-Friendly Assent Form(Template)

"Hi! My name is [your name] and I work with [organization name].

We are trying to understand how to better help young people like you.

I would like to ask you some questions about your experiences. You don't have to answer if you don't want to — it's completely your choice.

If you would like to participate now and later feel you want to stop, that's totally okay. Nothing bad will happen if you say no, and you will still get all your usual help.

Your answers will be kept private and will not be shared with anyone in a way that can identify you.

Sometimes we record what people say so we don't forget anything important. The recording will only be used by the research team and will be deleted after we finish using it.

Is it okay if we audio record your interview?

Yes, I agree to be audio recorded for the research interview

No, I do not want to be audio recorded

Photos, Audio or Video in Other Activities (WP3 or Events)

Sometimes we take photos, videos, or audio during activities, workshops, or events. These might be used in reports, presentations, or videos, but only with your and/or your guardian's permission.

Is it okay if we take your photo, record your voice, or film you during other project activities?

Yes, I agree to be photographed or recorded

No, I do not want to be photographed or recorded

Do you have any questions for me?

Would you like to take part?"

(Wait for a clear "yes" or "no".)

★ Tip:

When asking children to assent, always watch for non-verbal cues (hesitation, body language) — if a child looks unsure even if they say "yes", reconfirm gently.

APPENDIX I. DEFINITIONS

For the purposes of this policy, and procedures contained within it, the following working definitions are used:

Child/children: Refers to anyone under the age of 18 years old, irrespective of the age of majority in their country, or the country where they are located or living.

Unaccompanied child/children: a child who arrives on the territory of the Member States unaccompanied by an adult responsible for him or her whether by law or by the practice of the Member State concerned, and for as long as he or she is not effectively taken into the care of such a person; it includes a minor who is left unaccompanied after he or she has entered the territory of the Member States’.

Abuse: used in its widest sense and includes physical, emotional/psychological and sexual abuse, neglect and negligent treatment, violence and exploitation in all forms (indicatively labour, criminal , economic, emotional and social, digital exploitation) which the UN Convention on the Rights of the Child (CRC) and Optional Protocols define child exploitation broadly to cover all activities that unfairly use children for personal gain, especially where the child is unable to give informed, free consent.

Emotional Abuse: The persistent emotional ill-treatment of a child such as to cause severe and long lasting effects on the child’s emotional development. It may involve conveying to children that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It can also involve age or developmentally inappropriate expectations being imposed on children, or causing children frequently to feel frightened or in danger. Some level of emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.

Neglect: The persistent failure to meet the child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s physical or cognitive development.

Physical Abuse: This may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or caregiver feigns the symptoms of, or deliberately causes, ill health to a child who they are looking after.

Sexual Abuse: Involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening or gives consent. The activities may involve physical contact, including penetrative or non-penetrative acts. They may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic materials or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Staff: The term applies to anyone who works on a full time or part time basis. As such it includes employed staff, interns, consultants.

Volunteers: The term applies to anyone working on an unpaid basis. For the needs of this policy, every obligation of staff members applies to all volunteers an organization may occupy for the needs of this project.

II. International Standards & Guidelines

- **UN Convention on the Rights of the Child (CRC) (1989)**
- **Keeping Children Safe (KCS) Standards** [Keeping Children Safe Website](#)
- **Inter-Agency Standing Committee (IASC) Minimum Standards on Child Protection**
- **Save the Children's Child Safeguarding Standards & Guidelines**
- **Core Humanitarian Standard (CHS) on Quality and Accountability** [CHS Alliance Website](#)
- **International Taskforce on Child Protection (ITFCP)**
- **UNICEF's Child Safeguarding Toolkit for Businesses**
- **WHO Guidelines on Ethics & Child Protection in Research & Programming** [WHO Ethical Guidance](#)
- **EUR-Lex (Official EU Legal Portal)**
- **GDPR-Info.eu**
- **GDPR.eu: Prov**