



Arbeiter-Samariter-Bund  
Child Safeguarding Policy



Child Safeguarding Policy

October 2020

## Contents

1. Purpose of this Policy.....	4
2. Scope of this Policy .....	4
3. Key definitions.....	4
4. Policy statement .....	7
5. Zero tolerance.....	8
6. Policy implementation .....	8
6.1. Behavioural protocol.....	10
6.2. Safe recruitment .....	12
6.3. Training and Awareness.....	13
6.4. Safe Cooperative Arrangements.....	14
6.4.1. Contractors .....	14
6.4.2. Partners.....	15
6.4.3. Visitors .....	16
6.5. Safe programming.....	17
6.5.1. Design and implementation of child protection projects.....	18
6.5.2. Promotion of child survival and development.....	18
6.6. Safe communication .....	20
6.7. Important procedural issues.....	21
6.7.1. Procedural principles .....	21
6.7.2. Main involved persons in the process- staff with designated authority .....	21
6.7.3. Recording of the reports.....	22
6.7.4. Information sharing, data protection and confidentiality .....	22
6.8. Response to concerns .....	22
6.9. Compliance with Donor Requirements.....	24
7. Policy Management .....	24
7.1. Roles and responsibilities.....	24
7.2. Policy's main monitoring aspects.....	25
7.3. Communication and commitment to the Child Safeguarding policy.....	26
7.3.1. Ensuring beneficiaries' awareness.....	26
7.4. Regular review of the Child Safeguarding policy .....	26
Annex 1: Abstract of the ASB Child Safeguarding Policy .....	28
Annex 2: Guidelines for Safer Recruitment .....	33



Arbeiter-Samariter-Bund

Child Safeguarding Policy

Annex 3: Declaration of Criminal Convictions .....	35
Annex 4: Declaration of Agreement to be Bound by and Uphold the ASB Child Safeguarding Policy and the ASB PSEA Policy for Personnel .....	36
Annex 5: Declaration of Agreement to be Bound by and Uphold the ASB Child Safeguarding Policy for Partners.....	37
Annex 6: Declaration of Agreement to be Bound by and Uphold the ASB Child Safeguarding Policy Standards of Behaviour for Visitors.....	38
Annex 7: Informed Consent for Communication.....	39
Annex 8: Child Safeguarding Incident Reporting Form.....	42
Annex 9: Specific responsibilities for the Implementation of the policy .....	43
Annex 10: Risk assessment.....	44
Annex 11: Child Safeguarding Self-Audit tool.....	45
Annex 12: ASB Child Safeguarding Reporting and Response Procedure.....	48
Annex 13. Appointment of Focal Point/ Back Up Focal Point and CSP incident review panel members .....	49

## 1. Purpose of this Policy

Arbeiter-Samariter-Bund Deutschland e.V. is since 2016 registered and operating in Greece, in order to facilitate humanitarian programs undertaken by the Foreign Aid Department. Although guidelines and (minimum) standards are given to ASB country offices, such as in Greece, country offices have the duty to comply with national legal standards and the freedom to set objectives higher.

The purpose of the ASB's Child Safeguarding Policy is (1) to ensure that ASB projects, workers, or others working with or on behalf of the ASB do no harm to children, (2) to ensure that safety risks and cases of misconduct are identified, reported, and addressed in an appropriate and timely manner and (3) contribute positively to an environment in which children are safe from harm and abuse, with full adherence of their rights as defined by the convention of the Rights of the Child.

This purpose is a shared task for all of ASB personnel, together we can reach this goal.

## 2. Scope of this Policy

The scope of this document is to set out ASB Greece Child Safeguarding policy and procedures.

By stating this policy and procedures ASB:

- Recognizes the right of every individual to stay safe.
- Aims to ensure that the organization undertakes its responsibilities regarding protection of children and youth and will respond to concerns appropriately.
- Frames the principles and procedures for the support of staff and partners in their practices and clarifies the organization's expectations; this means that the actions of any person in the context of the work carried out by the organization are transparent, safeguard and promote the welfare of all children and young people. Therefore, this policy aims to ensure that procedures to actively protect children, respond to any concerns about their welfare and report such concerns to the competent authorities are in place and shall be followed.
- Promotes good practices, providing children and young people with the appropriate safety and protection whilst under the care of ASB and allowing staff and partners to make informed and confident responses to specific child protection issues.

The ASB's Child Safeguarding Policy pertains to:

- ASB personnel and associates.
- All visitors to ASB offices, project sites and activities.
- Sub-grantees, suppliers/sub-contractors, and implementing partners who have direct contact with children through ASB implemented or financially supported projects.

Although it is clear that this Safeguarding Policy relates to ASB and thus its scope covers at a minimum all and any of ASB's operations, projects, activities, working hours and offices, the scope of this policy extends beyond this and thus also covers off working hours and non-work related environments and activities of ASB personnel and associates.

## 3. Key definitions

**Child or Children**<sup>1</sup>: “A person under the age of 18, regardless of the age of majority or age of consent locally.”<sup>2</sup>

**Child Beneficiary**: For the purpose of this policy, “child beneficiary” refers to all children who are targeted recipients – direct or through their family – of ASB implemented or financially supported projects.

**Child Safeguarding**: The set of policies, procedures and practices that we employ to ensure that ASB is a child safe organization. Child Safeguarding is making ASB safe for children. It involves our collective and individual responsibility and preventative actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm by ASB staff, associates and third parties, who come into contact with children or impact them through our development interventions, humanitarian responses and operations. This includes our direct program implementation, work through partners and management of children’s personal data.

**Child Protection**: “The prevention of and response to abuse, neglect, exploitation and violence against children”<sup>3</sup>. Child protection means safeguarding children from harm. Child protection is not the protection of all children’s rights, which is the responsibility of everyone working with children, but refers instead to a subset of these rights.

**Forms of Harm**: Harm includes abuse, neglect, exploitation and violence. According to *Keeping Children Safe*<sup>4</sup> specific forms of harm are:

- **Physical Abuse**: Actual or potential physical harm perpetrated by another person, adult or child. It may involve hitting, shaking, poisoning, drowning and burning. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.
- **Sexual Abuse**: Forcing or enticing a child to take part in sexual activities that he or she does not fully understand and has little choice in consenting to. This may include, but is not limited to, rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing and touching. It may also include involving children in looking at, or producing sexual images, watching sexual activities and encouraging children to behave in sexually inappropriate ways.
- **Child Sexual Exploitation**: A form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, which may involve befriending children, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim’s options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual.

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<sup>1</sup> “Child or Children” is not qualified only as a beneficiary child; rather, this term is inclusive of all persons under the age of 18.

<sup>2</sup> UN Glossary on Sexual Exploitation and Abuse, 5 October 2016.

<sup>3</sup> Minimum Standards for Child Protection in Humanitarian Action, Child Protection Working Group (CPWG) (2012).

<sup>4</sup> Keeping Children Safe – Child Safeguarding Standards and how to implement them, Keeping Children Safe Coalition (2012).

Child sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity with multiple men.

- **Neglect and Negligent Treatment:** Allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in serious impairment of a child's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children from harm and provide for nutrition, shelter and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill treatment of a disabled child.
- **Emotional Abuse:** Persistent emotional maltreatment that impacts on a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.
- **Commercial Exploitation:** Exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour.

**ASB Personnel and Associates:** Any person employed by or working with the ASB. Specifically, the ASB personnel refers to all individuals who have entered into an employment or collaboration contract with ASB, including staff, volunteers, community committee members, interns and consultants, regardless of whether or not they are compensated monetarily, and regardless of the type or duration of their contract; while ASB associates refers to all personnel of other entities or individuals who have entered into a cooperative arrangement with the ASB, including contractors, partners and visitors.

**Suppliers/ Sub-Contractors:** For the purpose of this policy, "suppliers/ sub-contractors" refer to individuals, companies, or organizations with whom the ASB has a contractual relationship for the provision of goods or services.

**Sub-grantees:** For the purpose of this policy, "sub-grantees" refers to organizations to which an award of financial assistance is made under a grant by the ASB when the ASB is the Grant Holder ("prime" recipient).

**Implementing Partners:** For the purpose of this policy, "implementing partners" refers to private and public entities, other than sub-grantees or suppliers/sub-contractors, with which the ASB has a contractual agreement or memorandum of understanding (MoU) for the purposes of project implementation.

**Visitors:** For the purpose of this policy, "visitors" refers to individuals hosted by the ASB, who are visiting ASB implemented or financially supported projects/activities and are not ASB personnel or associates, or others involved in project implementation. It includes journalists, photographers, employees from other ASB offices, board members, and donors, among others.

## 4. Policy statement

In accordance with Article 19 of the United Nations Convention on the Rights of the Child (UNCRC)<sup>5</sup>, ASB recognizes the right of all children to be protected from all forms of abuse and exploitation. ASB further recognizes its responsibility to ensure that ASB projects, workers, and others working with or on behalf of the ASB **do no harm** to children. ASB is committed to ensuring that our organizational policies, protocol, procedures, and actions reflect our commitment to fulfilling this responsibility.

ASB recognises that all children have equal rights to protection from abuse, neglect, exploitation and violence, and that everyone has a responsibility to support the protection of children. We are therefore committed to the following:

1. **Promoting survival and development of children:** As well as children's right to life, right to protection from all forms of abuse, neglect, exploitation and violence, ASB commits to identifying and taking concrete action to reduce the effects of the emergency and the response on the physical, psychological, emotional, cognitive, social and spiritual development of children. This includes family reunification, preventing family separation, promoting family-based environments, with interim care and durable solutions considered as secondary options based on the best interests of the child.
2. **Ensuring that all children in need benefit from ASB programmes without discrimination<sup>6</sup>:** ASB is committed to provide support to children, families and communities without distinction of any kind, such as race, colour, ethnicity, religion, sexuality, language, age, disability, gender, sex, political or other opinion, family circumstances, health, marital status, birth or other status. ASB recognises that emergencies often magnify existing differences and further marginalise those already at risk of discrimination. ASB is committed to identifying and monitoring existing and new patterns of discrimination and power, and tackle them in the response as part of its commitment to the "Do No Harm" principle. ASB will also take special measures to ensure appropriate and adequate care is provided to children with disabilities, unaccompanied and separated children (UASC), child-headed households, children in conflict with the law, children associated with armed forces or armed groups (CAAFAG), and other marginalised groups.

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<sup>5</sup> United Nations Convention on the Rights of the Child, 1989. Article 19: 'State Parties shall protect the child from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse'. <http://www2.ohchr.org/english/law/pdf/crc.pdf>.

<sup>6</sup> Based on affirming ASB commitment to the United Nations Convention on the Rights of the Child (UNCRC) (1989); the Convention on the Elimination of all forms of Discrimination Against Women (CEDAW); the United Nations Convention on the Rights of Persons with Disabilities (2012); the ILO Convention No. 182 on the Worst Forms of Child Labour (1999); the Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography (2000); the Refugee Convention (1951); the Guidelines on Internally Displaced Persons; the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the UN Convention against Transnational Organized Crime; the Minimum Standards for Child Protection in Humanitarian Action; the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse; the IASC Six Core Principles Relating to Sexual Exploitation and Abuse. Also the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1987); the Guidelines on the Protection of Child Victims of Trafficking UNICEF technical notes; the ILO Convention on the Minimum Age for Workers (1973).

3. **Encouraging and enabling child participation in all activities concerning children and their communities:** ASB is committed to ensuring that children of different ages and abilities are given space and time to meaningfully participate. ASB personnel and partners must be aware of their own values, beliefs and assumptions about childhood and the roles of the child and the family and avoid imposing these on children. They should enable developmentally appropriate ways of child participation, share power with children in decision making, and be sensitive to how children's participation can, when done poorly, upset children's social roles and exposure to harm.
4. **Ensuring that the best interests of the child are paramount:** In all actions concerning children, the best interests of the child will be a primary consideration. This principle should guide the design, monitoring, and adjustment of all humanitarian programmes and interventions. Where ASB takes decisions regarding individual children, this needs to be based on the Best Interest Determination (BID) process<sup>7</sup>.
5. **Promoting sensitivity to local culture and adherence to the UNCRC:** ASB is committed to respecting local customs and culture, whilst at the same time honouring and promoting the fundamental rights belonging to children as enshrined in the UNCRC. ASB will consistently recognise children as those under the age of 18 years, even if the legal age of majority is at a lower age. ASB will work to protect children from traditionally sanctioned forms of child harm, such as corporal punishment, Female Genital Mutilation (FGM) and early marriage.

## 5. Zero tolerance

ASB has a zero-tolerance policy regarding the abuse and exploitation of children. ASB Employees, visitors, sub-grantees, suppliers/sub-contractors, and implementing partners are prohibited from engaging in any form of abuse or exploitation of children.

Failure of ASB Employees to uphold or comply with the Child Safeguarding Policy is grounds for disciplinary action up to and including termination of employment or contract. Sub-grantees, suppliers/sub-contractors, and implementing partners who have direct contact with children must be informed of the pathways for reporting violations of the behavioural protocol outlined in the Child Safeguarding Policy or must agree upon other reporting processes.

Violations of the child safeguarding expectations outlined in contracts, agreements, or MoU's with sub-grantees, suppliers/sub-contractors, or implementing partners shall be grounds for termination of contract or agreement.

## 6. Policy implementation

The ASB recognises that the successful implementation of its Child Safeguarding Policy depends on the individual and collective responsibility of all those who work for and with the ASB, including partners, communities and children themselves.

The ASB intends to meet its commitment to protecting children from harm through the following approach:

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<sup>7</sup> The UNHCR, Guidelines on Assessing and Determining the Best Interests of the Child, 2018 Provisional Release, can be accessed from the link <https://www.refworld.org/pdfid/5c18d7254.pdf>.

- **Awareness:** Ensuring that all personnel and associates of the ASB, as well as target children and communities, are aware of what child harm is, the risks of child harm to children's safety, well-being, dignity and development, and ASB zero tolerance towards child harm.
- **Prevention:** Ensuring that children are protected from harm by the ASB personnel and associates through safe recruitment, safe cooperative arrangements, safe programming and safe communication practices, and by promoting an environment where all of the ASB personnel and associates work to minimise the risks which might lead to cause harm to children.
- **Reporting:** Ensuring that complaint mechanisms for reporting child protection concerns are in place and accessible, and that all of the ASB personnel and associates are clear what procedures to follow where concerns arise regarding Child Safeguarding.
- **Response:** Ensuring that appropriate measures are taken to protect and support children where concerns arise regarding Child Safeguarding, and that commensurate actions are taken where suspicions regarding a Child Safeguarding incident are validated.
- **Promoting culture of openness, sensitivity and support:** Ensuring that the ASB management favours open lines of communication and dialogue, and an atmosphere of support in order to implement and improve the ASB Child Safeguarding prevention practices and response procedures.

The ASB is committed to ensuring that allegations of violations of the Child Safeguarding Policy are reported, investigated, and responded to in a timely, fair, transparent and consistent manner. Beneficiaries shall be informed of the ASB's commitments to children under the Child Safeguarding Policy and shall be informed of how to report suspected violations of these commitments.

The ASB shall progressively implement the Child Safeguarding Policy and monitor its application over time. Upon approval of this policy and formal appointment of the Child Safeguarding Focal Person and Back Up Focal Person for the ASB the following steps will be taken, which will be repeated on an annual basis:

1. Throughout the year, the Focal Person (or the Back Up Focal Person in his/her absence) will receive, register and follow up on concerns that would be a breach of the ASB's Child Safeguarding Policy. For this the Focal Person will develop a reporting mechanism.
2. At the end of each year (November), the Child Safeguarding Focal Point will draft an annual child safeguarding report and present this to the Senior Management Team (SMT) of the ASB for acceptance (December).
3. Based on this reporting, all managers will receive an overview of Child Safeguarding issues and will be asked to draft a plan outlining how to improve the Child Safeguarding within their department, to be approved by the SMT of the ASB (February).
4. The Child Safeguarding Focal Person for the ASB will also designate a backup for periods requiring multiple responses and reporting through the developed mechanism. The Back Up Focal Person will also be competent to respond to matters as they arise in the absence of the Focal Person.

Specific measures to increase Child Safeguarding are mentioned below.

## 6.1. Behavioural protocol

The ASB is committed to ensuring that ASB Personnel and Associates, as well as visitors, conduct themselves in a way that is safe for children. The required contact naturally always relates as a minimum to working hours and work environments, but also extends beyond that, to out of office hours and environments that are not work related.

The ASB Personnel and Associates are required to comply with the behavioural protocol outlined below.

At a minimum, the ASB Personnel and Associates **should**:

- Promote child participation. Always listen to children and encourage children and their families to be involved in making decisions relating to their lives.
- Promote non-discrimination. Treat children equally, irrespective of the child's or his/her parents' race, colour, ethnicity, religion, sexuality, language, age, disability, gender, sex, political or other opinion, family circumstances, health, marital status, birth or other status.
- Deliver aid assistance to children and communities in ways which do not abuse your position of power, trust and authority.
- Be aware that physically touching a child, perhaps to offer comfort, can be misconstrued by observers or the child.
- Avoid situations which isolate children and where your behaviour cannot be observed such as in cars, offices and homes.
- Where possible and practical, follow the 'two-adult' rule while conducting work, where two or more adults supervise all activities that involve children, and are visible and present at all times. If this rule is not possible in practice, seek alternatives such as being accompanied by community members or interacting in open spaces.
- Promote a culture of openness where issues and concerns can be raised, discussed among staffs, with children and communities.
- Ensure that all communications regarding children guarantee the protection, confidentiality, privacy, dignity and best interests of the child.
- Ensure when making images of children or their families (photos, video, etc.) that they are respectful, that people are adequately clothed and that sexually suggestive poses are avoided. No image where children and their families are identifiable can be made public through social media or other means without the informed consent or assent of the subjects (see 6.6. Safe communication).

- Report any child protection concern in a timely manner and in accordance with ASB established reporting procedures (see **The ASB is committed to responding to concerns by any party during** ). In the case where it is known or it is suspected that a child is at risk or suffering abuse, take urgent action to report and, where necessary, refer the child to appropriate services.
- Comply with child protection related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation.
- Challenge poor practices, and report potential risks which might lead to cause harm to children.

Moreover, the ASB Personnel and Associates **should never**:

- Smack, hit or physically abuse children, whether as a form of discipline or otherwise.
- Engage in any form of sexual relations with children or beneficiaries.
- Engage in any form of inappropriate physical behaviour such as kissing, hugging or touching a child.
- Use inappropriate words, offensive, threatening or intimidating behaviours that shame, humiliate, belittle or degrade children or engage in emotional abuse.
- Act in a manner or organise activities which are abusive or place children at risk of abuse.
- Spend excessive time alone with a child excluding him/her from others.
- Stay alone with children in a room with the door closed and where you cannot be seen by other people or invite a child to your place of residence.
- Develop abusive or exploitative relations with children, including hiring children for domestic or other labour.
- Condone or participate in activities where the child's behaviour is likely to lead to abusive or illegal acts.
- Discriminate through preferential treatment to a child (i.e. gifts, sponsorships, money, etc.).
- Use, download or buy pornography, or other photography or video, for sexual purposes.
- Take images of children (photos, video, etc.) which are detrimental or explicit and undermine the child's dignity.
- Share photos on social media where children and/or their families are identifiable, as this could potentially put children at serious risk.

- At any time make comments to the media on child protection matters except where the Country Director has previously been made aware of media interest and agreed the response in advance.
- At any time, breach confidentiality, informed consent or incident reporting procedures regarding a child protection incident or case.

All personnel of the ASB are obliged to adhere to these standards of behaviour. Failure to comply with these standards or failure to report child protection concerns is grounds for disciplinary action. This action may include termination of contract or summary dismissal and may result in the case being forwarded to the local authorities for criminal prosecution where appropriate and in accordance with applicable national laws. The standards set out above are not intended to be an exhaustive list. Other types of inappropriate behaviour towards children may be grounds for disciplinary actions as well. ASB personnel must not engage in any form of humiliating, degrading or exploitative behaviour under any circumstances.

The ASB shall ensure that all employees are informed of their obligation to abide by the behaviour protocol outlined above. For this the ASB shall include behaviour protocol in the ASB staff orientation and training materials. All personnel of the ASB will need to confirm in written that they have been instructed regarding this.

## 6.2. Safe recruitment

The ASB is committed to undertake child-safe recruitment and screening practices before formalising collaboration with staff, volunteers, community committee members, interns and consultants.

The mandatory practices required for recruitment of international and national positions are:

- All job advertisements will state that ASB has a Child Safeguarding Policy that the successful candidate will be expected to comply with and promote.
- Candidates who are short-listed for interview will be provided with the abstract of the Child Safeguarding Policy in advance of their interview, (see Annex 1: Abstract of the ASB Child Safeguarding Policy) and there will be specific standardised interview questions on protection of children from harm (see [Annex 2: Guidelines for Safer Recruitment](#)).
- Particular attention will be paid to gaps in an individual's employment history and frequent changes of employment and/or address.
- All prospective staff and consultants will be required to provide at least two references, including the last line manager. References from family members will not be accepted. References will be checked on any child safeguarding issue or incident involving the candidate, and dismissal or pending investigation into behavioural misconduct (see [Annex 2: Guidelines for Safer Recruitment](#)).

- Volunteers and interns will also be required to provide at least two references, if possible including at least one among the staff of the entity they have previously been working or volunteering for. References from family members will not be accepted.
- The successful candidate will be required to provide proof of identity (passport or national identity document) and a personal declaration stating any criminal conviction, including spent convictions (see Annex 3: Declaration of Criminal Convictions).
- An original criminal record certificate should be submitted to the HR department prior to the hiring of the candidate.
- The Child Safeguarding Policy will be included in the proposal of collaboration.
- All staff, volunteers, community committee members, interns and consultants will be required to acknowledge in written the receipt, understanding and commitment to the Child Safeguarding Policy and related standards of behaviour prior to commencement of their contract/placement (see [Annex 4: Declaration of Agreement to be Bound by and Uphold the ASB Child Safeguarding Policy and the ASB PSEA Policy for Personnel](#)). The signed statement of commitment to the Child Safeguarding Policy will be kept on file together with the signed employment or collaboration contract.
- An assessment of the individual's commitment to comply with and promote implementation of the Child Safeguarding Policy will be included in the standard internal performance review process cycle (see [Annex 2: Guidelines for Safer Recruitment](#)).

### 6.3. Training and Awareness

For the effective implementation of the Child Safeguarding Policy, the ASB's commitment to child protection needs to be understood clearly and accurately by all personnel and associates of the ASB , as well as target children and communities.

Therefore, the ASB is committed to the following:

- Include in the induction process for all new staff, volunteers, community committee members, interns and consultants - international and national – a module on what Child Safeguarding is and the content of the Child Safeguarding Policy in order to ensure that all ASB personnel is aware of the Child Safeguarding Policy guiding principles, the related standards of behaviour, the implications of breaching these standards and the incident reporting procedures.
- Conduct repeated refresher training for personnel at both field and managerial level on the content of the Child Safeguarding Policy and related standards of behaviour. Appropriate support should be made available to training participants who experience an emotional reaction to the topics covered.
- Provide opportunities for internal and external training on child safeguarding and protection, particularly to identify activity-specific child safeguarding and protection risks and practically

implement the Minimum Standards for Child Protection in Humanitarian Action (CPMS, 2012)<sup>8</sup>.

- Raise awareness widely amongst target communities on what child harm is, children's rights to protection from all forms of harm, ASB zero tolerance towards child harm and options for reporting child protection concerns.
- Orient children involved in the ASB programmes on their rights to protection from all forms of harm, zero tolerance towards child harm and options for reporting child safeguarding concerns in a child-friendly manner which is age, gender and diversity sensitive. This includes organising workshops with children to define acceptable and unacceptable behaviour by adults or other children and discuss openly with them about their contacts and relationships with the ASB staff and others. Appropriate support should be made available to workshop participants who experience an emotional reaction to the topics covered.
- Make the Child Safeguarding Policy summary available in local languages and develop a child-friendly version to be disseminated in target communities, with partners and other relevant stakeholders. Posters of the Child Safeguarding Policy commitments and related standards of behaviour must also be displayed in each office/base.
- Monitor and regularly review the effectiveness of the Child Safeguarding training and awareness materials and programmes. This process should involve the participation of children as and when appropriate.

## 6.4. Safe Cooperative Arrangements

### 6.4.1. Contractors

ASB will not enter into contractual agreements for the supply of goods, services or works with contractors which are known to utilise child labour or are involved in any other practice that can harm or is likely to cause harm to children. The ILO Convention No. 138<sup>9</sup> on the minimum age for admission to employment and work (Version 1973) guides ASB with the following definitions:

- 1) Hazardous Work: work which is likely to jeopardize children's physical, mental or moral health, safety or morals should not be done by anyone under the age of 18; and
- 2) Light Work: children between the ages of 13 and 15 years old may do light work, as long as it does not threaten their health and safety, or hinder their education or vocational orientation and training.

The Logistics Department at country level will be responsible for supporting the implementation of the following mandatory practices:

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<sup>8</sup> The Minimum Standards for Child Protection in Humanitarian Action (CPMS, 2012) can be accessed from the link <http://cpwg.net/minimum-standards/>

<sup>9</sup> The Minimum Age Convention (International Labour Organization, 1973) can be accessed from the link [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C138](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138)

- As part of the pre-qualification and bidding processes, all potential contractors will be required to submit together with the official documentation the Supplier/Tenderer's Declaration to the effect they are aware and formally agree to abide by the ethics clauses specified in the ASB Code of Ethics, and commit to immediately inform the ASB if any change occurs in this respect at any stage of the award process or during the fulfilment of the contract itself. This declaration must cover all the partners in joint venture/consortium, as well as all the sub-contractors and suppliers of the potential contractor.
- Where possible, an independent background check into the contractor's business practices will be conducted to inform the pre-qualification assessment or bid analysis.
- The Supplier/Tenderer's Declaration and the information from a possible independent background check will be used by the Evaluation Committee in the selection process. Copies of all official documentation will be kept on file.
- The above-mentioned ethics clauses will be integral part of any supply, service or works contract.

The ASB reserves the right to suspend or cancel a contractual agreement for the supply of goods, services or works, if child labour or any other practice that can harm or is likely to cause harm to children are discovered at any stage of the award process or during the fulfilment of the contract itself on the basis of investigation into allegations of harm to children. However, ASB will ensure that termination of a contractual agreement is carefully considered as a last resort and dependent on the contractor's mishandling of the child protection concern rather than on the basis of the child protection concern having arisen, reported and handled according to the ASB Child Safeguarding Policy.

#### 6.4.2. Partners

Acceptance of and compliance with the Child Safeguarding Policy and related standards of behaviour must be a condition of every partnership agreement or sub-agreement. The ASB will not enter into partnership arrangements with entities – international or national, humanitarian or institutional – which utilise child labour according to the ILO Convention No. 138 on the minimum age for admission to employment and work (Version 1973), and do not commit to protecting children from harm.

The ASB must ensure the following mandatory practices when working with partners:

- An assessment about the partner's commitment and capacity to prevent and respond to harm to children will be conducted prior to signing a partnership agreement or sub-agreement, as well as at regular intervals during the implementation. The assessment must take into consideration also the partner's contact with children and the activity specific Child Safeguarding risks.
- Partners which do not have their own robust Child Safeguarding Policy will be required to sign up to the ASB Child Safeguarding Policy as a condition of any partnership arrangement (see [Annex 5: Declaration of Agreement to be Bound by and Uphold the ASB Child Safeguarding Policy for Partners](#)). The statement of commitment to the ASB Child Safeguarding Policy must be signed by the legal representative of the partner and will be

- kept on file by both parties. The personnel of the partner will need to be made aware of the content of the ASB Child Safeguarding Policy and related standards of behaviour.
- Where possible, training will be offered to partners to identify Child Safeguarding risks and define related Child Safeguarding mitigation measures throughout programming, as well as to develop their own robust Child Safeguarding Policy.

The ASB reserves the right to suspend or cancel a partnership agreement or sub-agreement on the basis of investigation into allegations of harm to children. However, the ASB will ensure that termination of a partnership agreement or sub-agreement is carefully considered as a last resort and dependent on the partner's mishandling of the child protection concern rather than on the basis of the child protection concern having arisen, reported and handled according to the ASB Child Safeguarding Policy.

### 6.4.3. Visitors

Visitors to ASB or ASB partners' programme activities that involve children will also be bound by the Child Safeguarding Policy standards of behaviour.

In order to protect children from harm, the following practices are applied for visitors, including journalists, photographers, celebrity ambassadors, authorities, donors, personnel of other agencies or organisations, and other stakeholders:

- All visitors should be advised that the Child Safeguarding Policy prohibits unannounced visits to programme activities that involve children.
- A clear agenda should be developed and approved by the country office prior to visit. The agenda will also be referred to confirm with ASB Country Protection Coordinator, Regional Protection Focal Points, Compliance Manager and Communications Officer for clearance.
- Prior to commencement of their visit, visitors should be provided with the abstract of the Child Safeguarding Policy (see Annex 1: Abstract of the ASB Child Safeguarding Policy), briefed about the related standards of behaviour by an ASB representative at the country level, and required to sign a declaration to the effect they are aware and formally agree to comply with these standards (see [Annex 6: Declaration of Agreement to be Bound by and Uphold the ASB Child Safeguarding Policy Standards of Behaviour for Visitors](#)).
- All visitors will be accompanied during the visit by an ASB staff member trained on Child Safeguarding and Child Protection. The presence of a partner staff member cannot replace the presence of a qualified and appointed ASB staff member. Visitors are not allowed to spend time with or have access to children without supervision.
- ASB and ASB partners' personnel must never disclose information that identifies children or their families to any unauthorised person or make such information available to the general public. In the case this may be necessary, a written informed consent of the child or his/her parent/legal guardian/caregiver must be gathered, and the need to disclose identifying information discussed with the country office prior to submitting any request of consent.

- For interviews with children, visitors will be required to gain a written informed consent of the child or his/her parent/legal guardian/caregiver. Children aged above 16 years can give their consent directly, but it is always preferable to seek the consent of the parent/legal guardian/caregiver when not against the best interests of the child or the child's will (see [Annex 7: Informed Consent for Communication](#)).

If a visitor is found in breach of the Child Safeguarding Policy standards of behaviour, ASB reserves the right to suspend or terminate the visit and handle the case in accordance with the established procedures.

## 6.5. Safe programming

All ASB programmes and activities need to be designed and implemented to minimise actual or potential risks of harm to the children they come into contact with or impact upon directly or indirectly. ASB is committed to designing and implementing programmes and activities that:

- Adhere to the principles and standards outlined in the Minimum Standards for Child Protection in Humanitarian Action (CPMS, 2019 Edition)<sup>10</sup>.
- Ensure children safety by identifying Child Safeguarding risks which may be related to the context or the specificity of the programmes and activities themselves, and taking all necessary mitigation measures that account of the impact (intended or unintended) on the children and communities engaged.

Support children and communities affected by child abuse, neglect, exploitation and violence to access safe services in a timely manner, and support their physical, emotional and psychosocial recovery.

Child-safe programming considerations need to be mainstreamed throughout the programme cycle phases: assessment, planning, resource mobilization, implementation and evaluation.

- It will be the responsibility of the ASB country office to integrate child protection situation analyses into the strategic direction and design of the country programmes and projects. This includes conducting Child Safeguarding and Child Protection risk analyses and elaborate mitigation strategies which take into consideration the child protection concerns identified at the country level. This process should include categorization of interventions and implementation modalities by risk significance level.
- It will be the responsibility of the ASB country office to integrate child protection considerations into the design of needs assessment and new project proposals, including identification of activity specific Child Safeguarding risks and related mitigation measures.
- It will be the responsibility of the ASB country office to work in culturally sensitive ways to address child rights and encourage children participation in decisions that affect their lives, including participation in the design, monitoring and evaluation of ASB activities.

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<sup>10</sup> The Alliance for Child Protection in Humanitarian Action, Minimum Standards for Child Protection in Humanitarian Action, 2019 Edition, can be accessed from the link <https://handbook.spherestandards.org/en/cpms/#ch001>.

- It will be the responsibility of the ASB country to intentionally plan how to positively impact the most vulnerable children and develop plans to strengthen local organisations to become more child safe.
- It will be the responsibility of the ASB Programme Managers and Project Managers for all sectors to undertake review of on-going projects in order to ensure that activity-specific Child Safeguarding risks are taken into consideration and related mitigation measures are developed.
- It will be the responsibility of the ASB Programme Managers and Project Managers for all sectors to ensure that the Child Safeguarding mitigation measures designed are put into practice during the project implementation.
- It will be the responsibility of the ASB Programme Managers and Project Managers for all sectors to monitor and regularly review the effectiveness of the Child Safeguarding mitigation measures designed, and report about any challenge faced in implementation.

The ASB Country Protection Coordinator, Regional Protection Focal Points and Compliance Manager will be responsible for technically supporting both the design and the implementation of child-safe programmes and activities.

#### *6.5.1. Design and implementation of child protection projects*

When designing child protection projects, ASB will focus on the organisation's capacity and expertise in order to achieve:

- Implementation of all project activities in adherence to child protection principles and an ongoing goal to safeguard all children participating in the project
- Risk mitigation and prevention measures against the potential safety and security implications for the ASB when engaged in such projects (including threat to reputation).

Where there is an on-going child protection project, if the security situation changes, the ASB reserves the right to amend programme activities when implementation contravenes child protection and safeguarding principles or they put at risk the security of the ASB personnel or operations.

#### *6.5.2. Promotion of child survival and development*

To promote child survival and development, the ASB will integrate child protection across programming. The ASB conducts child-specific activities especially with specific groups of vulnerable children.

Therefore, the ASB commits to the following:

- i. Children's care and development:

ASB recognises that the maintenance of family unity and the reunification of families have been established as a priority in international law. Utilising the Alternative Care in Emergency Settings Toolkit (2013)<sup>11</sup> as reference, the ASB commits to:

- Prioritise family reunification. Interim care and durable solutions will be secondary options based on assessment of the best interests of the child. The ability of the ASB to provide direct support for children within interim care will be weighed against the potential security implications for ASB (including threat to reputation). Where direct provision of interim care is not possible, ASB will work to determine the possible options as part of a BID process.
- Where interim care may be required, put in place special measures when engaging children who are living in interim or durable alternative care arrangements. The ASB will always favour family-based care over institutions. The ASB only works with children outside alternative family-based care on a temporary basis and in circumstances which prohibit placement in family-based care (such as those with serious behaviour or safety concerns).
- Support alternative durable solutions for children in institutional interim care settings by providing qualified child protection case management services and continuous support for caregivers providing family-based care.
- Integrate into programming working directly with children, their caregivers and communities to promote understanding of and community-based childhood development, child rights and child protection including through the establishment and support of community committees on child protection and child rights clubs.

ii. Activities directly involving children:

The ASB works with children who are separated or unaccompanied from their parents or original caregivers (UASC<sup>12</sup>), as well as conducting activities directly with children in schools, child-friendly spaces and other activities outside of parental or caregiver supervision. ASB has a duty of care towards these children and their communities. Utilising international best practices as reference, including the Minimum Standards for Child Protection in Humanitarian Action (CPMS, 2019 Edition)<sup>13</sup> and the Inter-agency Network for Education in Emergencies Minimum Standards (INEE MS, 2010 Edition)<sup>14</sup>, ASB commits to:

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<sup>11</sup> The Interagency Working Group on Unaccompanied and Separated Children (2013) Alternative Care in Emergencies Toolkit, published by Save the Children on behalf of the Interagency Working Group on Unaccompanied and Separated Children can be accessed from the link [https://resourcecentre.savethechildren.net/node/7672/pdf/ace\\_toolkit\\_0.pdf](https://resourcecentre.savethechildren.net/node/7672/pdf/ace_toolkit_0.pdf).

<sup>12</sup> Although jointly included in this UASC definition, we should differentiate between Unaccompanied Children who are children separated from both parents and other relatives and are not being cared for by an adult, and Separated Children who are children separated from both parents, or from their previous legal or customary primary caregiver, but not necessarily from other relatives. Separated Children therefore may include children accompanied by other adult family members and they might need support to strength this arrangement.

<sup>13</sup> The Alliance for Child Protection in Humanitarian Action, Minimum Standards for Child Protection in Humanitarian Action, 2019 Edition, can be accessed from the link <https://handbook.spherestandards.org/en/cpms/#ch001>.

<sup>14</sup> The International Network for Education in Emergencies, The Minimum Standards for Education: Preparedness, Response, Recovery, 2010 Edition, can be accessed from the link [https://inee.org/system/files/resources/INEE\\_Minimum\\_Standards\\_Handbook\\_2010%28HSP%29\\_EN.pdf](https://inee.org/system/files/resources/INEE_Minimum_Standards_Handbook_2010%28HSP%29_EN.pdf).

- Develop activity-specific risk mitigation strategies, standards of behaviour and SOPs for those directly interacting with children.
- Where operating interim institutional care arrangements and/or working with foster families, develop before implementation specific Child Safeguarding SOPs based on international best practices, and review them during implementation on a quarterly basis.
- For activities directly involving children's interaction with other children, adopt child-to-child behavioural code of conduct and measures on anti-bullying and prevention of sexual exploitation and abuse.

## 6.6. Safe communication

The ASB has a duty of care towards the children with whom it comes in contact and always must put their best interests first. Children have the right to be accurately represented and the ASB accepts its responsibility not to portray a manipulated or sensationalized image of a child's well-being and circumstances. Children must be presented as human beings with their own identity and dignity preserved.

All of the ASB personnel and associates need to be aware that photos and other identifying details of children and their families represent a risk to their safety and dignity, particularly in conflict and post-conflict situations. The "Do No Harm" principle must guide the collection and use of images and information about children and their families.

All personnel and associates of the ASB are obliged to adhere to the following standards of behaviour when recording and using images and stories of children and their families:

- Ensure when making images of children and their families (photos, video, etc.) that they are respectful, that people are adequately clothed and that sexually suggestive poses are avoided.
- Choose images and related messages based on values of respect and equality. Images should represent a broad range of children – boys and girls, and various ages, abilities and origin -and not present them as victims.
- Truthfully represent the situation both in its immediate and wider context.
- Avoid approaches that potentially stereotype or sensationalise people, situations or places.
- Ensure that people whose situation is being represented can communicate their stories themselves.
- Conform to the highest standards of children's rights (UNCRC) and encourage children to give their own accounts as much as possible, rather than letting others speak on their behalf.
- Take and use images and stories only with the full understanding and permission of the child or his/her parent/legal guardian/caregiver. The informed consent needs to be signed (or verbally agreed to) and filed in a secure location (see [Annex 7: Informed Consent for Communication](#)). No image and/or story where children and their families are identifiable can

be made public through the ASB website or other means without the informed consent or assent of the subjects.

- Change the names of the subjects to protect their identity, unless they have explicitly stated a preference that their genuine name should be used, and security implications are not a factor.
- Do not disclose personal information (such as location) which could put children and their families at risk on the ASB website or in public literature.
- Report in a timely manner any complaint or concern about inappropriate or intrusive images through the same procedures as for reporting child protection concerns.

Social media generated by the ASB are subject to the same safe communication practices as outlined above.

All media folders and photographs need to be stored in a secure area to which a limited number of people have access on need basis. Disclosure of these photographs to the ASB Communication and Fundraising Unit at HQ or third parties can be made only with approval of Head of Communications. Questionable photographs will be referred to confirm with the Country Protection Coordinator, Regional Protection Focal Points or Compliance Manager for clearance prior to being placed on the ASB database or disclosed with third parties. In certain specific activities (such as IDTR), images may be necessary for the purposes of verification and photographs may play an important part of the process for young children (aged under 5 years) and those children with insufficient information for tracing; these photographs can be disclosed only on approval by the Program Manager in charge.

## 6.7. Important procedural issues

The ASB establishes a special process regarding the stages of reporting safeguarding issues and concerns. This process refers to the immediate actions that shall be taken in case of safeguarding concerns.

### 6.7.1. Procedural principles

The process is based on the ASB statutory mission and objectives, on the specific scope (see [2. Scope of this Policy](#)) and the principles of this policy (see [4. Policy statement](#)) stated in the current document.

### 6.7.2. Main involved persons in the process- staff with designated authority

- Referring person/ submitting the report
- Immediate manager of the referring person (if the concern is communicated by a staff, partner or volunteer member)
- Principle contact- referral person
- ASB Senior Management Team members

The principle contact- referral person has a key role within the process (see Annex 12: ASB Child Safeguarding Reporting and Response Procedure).

### *6.7.3. Recording of the reports*

A written record of concern reports shall be kept, including the actions that have been taken for its handling and the follow up actions. The person in charge for this record is the “principle contact-referral person” appointed by the ASB Senior Management Team.

### *6.7.4. Information sharing, data protection and confidentiality*

Respect of the principles of trust, confidentiality and personal data protection is required. A safe information sharing process among the competent involved professionals/ stakeholders shall be followed. Data protection and confidentiality duty is expanded throughout the involvement in ASB works and tasks and even after that. The local legislation and best practises regarding the protection of privacy and personal data shall be respected and followed throughout the process.

## **6.8. Response to concerns**

The ASB is committed to responding to concerns by any party during works and tasks and even after their conclusion. The process of receiving reports and the communication are in accordance with the procedure below:

### 1. Report of the concern- communication

Concerns related to child protection and safeguarding may originate at any point of the ASB activities and by any staff, partner or visitor. Concerns and reports will be collected on an ongoing basis by the Focal Point.

- Any concern shall be communicated by the referring staff member or volunteer to his/her immediate manager and to the principal contact/Focal Point (see [Annex 12: ASB Child Safeguarding Reporting and Response Procedure](#) & [Annex 8: Child Safeguarding Incident Reporting Form](#)).
- If the concern is related to the immediate manager’s behaviour/acts, then the referral person shall be directly communicated.
- Especially, reports concerning volunteers or internship students should be addressed to the person responsible for the volunteers.
- Any concern or complain by a third person (out of the staff, including volunteers and occasional visitors) or by a beneficiary shall be referred to the principal contact – referral person or (in absence of this person) to the ASB Senior Management Team.
- The Focal Person (or the Back Up Focal Person in his/her absence) is responsible for properly and immediately referring the concern to the ASB Senior Management Team.

According to [Annex 9: Specific responsibilities for the Implementation of the policy](#), Officers and Managers of the ASB are responsible to ensure that their staff is familiar with the [Annex 12: ASB Child](#)

**Safeguarding Reporting and Response Procedure** and **Annex 8: Child Safeguarding Incident Reporting Form**.

## 2. Immediate attention and support

Special care shall be taken for the support and the protection of the child, upon initial relevant assessment by the Country Protection Coordinator (see Annex 12: ASB Child Safeguarding Reporting and Response Procedure). Where appropriate, medical and psychological support shall be made immediately available with the support of the ASB.

## 3. Assessment and decision making

The Focal Person (or the Back Up Focal Person in his/her absence) shall try to determine and establish clear facts in reported cases in the most transparent, objective, and immediate manner possible. Reports, facts and information relating to alleged incidents contravening this policy will be reported to an CSP incident review panel, convened by the Focal Person.

The CSP incident review panel is designated by the CSP policy and membership is reviewed annually. Members include the Focal Person and their backup as well as one additional member. The purpose of the Focal Person is to undertake the assessment of the reported concern and prepare recommendation on the further action to take place. The review panel's conclusions and suggestions are presented to the ASB Senior Management Team via an official report (see **Annex 8: Child Safeguarding Incident Reporting Form**). The latter may request further clarification or information and will finally make a decision on an action plan. The action plan may include:

- Protection actions and intervention in a safe and appropriate way
- Reference to local authorities
- Allegations process and referral to legal pathways
- Conflict/complaint resolution process
- Disciplinary process etc

All minutes of meeting of the review panel and correspondence in relation to the action plan are archived and maintained by the Focal Person for future reference.

(see **Annex 12: ASB Child Safeguarding Reporting and Response Procedure**).

## 4. Contact with concerned persons

Once concerns are evaluated, legitimate claims will also lead to contact and communication with the family/ parents/ guardian of the child - provided that there is a family/ supportive environment living together with the child.

Following to the aforementioned 4-steps and depending on the assessment of the case and the decision made on it, the steps below may follow:

## 5. Reference to competent authorities

In case of serious safeguarding concerns or allegations, the ASB Senior Management Team shall report it to the competent local authority and ask for advice. The advice given shall be followed. Depending on the case, it may initiate judicial proceedings and/or other disciplinary process.

## 6. Disciplinary process

In any case of alleged abuse and/or misconduct and/or infringement of the current Child Safeguarding Policy the ASB may proceed to the implementation of appropriate disciplinary measures, that, may

indicatively include: the expulsion/termination /suspension (depending on the case) of the cooperation with the engaged alleged person, the withdrawal from the job, partner, volunteer contract (depending on the case), report to the competent official authorities and judicial authorities.

#### 7. Implementing the right to inform

The ASB shall reserve the right to inform other institutions which may apply for professional references of the termination of contract for serious violation of the principles of the protection of children within the legislative framework applicable to the protection of personal data.

### 6.9. Compliance with Donor Requirements

ASB is committed to making all efforts to ensure that the ASB and our sub-grantees, sub- contractors, and implementing partners comply with the child protection/safeguarding policy requirements set forth by donors.

Where donors require child safeguarding measures that exceed those outlined in the ASB's Child Safeguarding Policy, relevant ASB departments, units, and programs shall make all efforts to comply with those measures.

Sub-grantees, suppliers/sub-contractors, and implementing partners who have direct contact with children through the ASB implemented or financially supported projects must agree to comply with the child protection/safeguarding policy requirements set forth by donors for that project. These requirements shall be clearly outlined in the ASB contractual agreements with sub-grantees, suppliers/sub- contractors, and implementing partners.

Where a potential sub-grantee, supplier/sub-contractor, or implementing partner has direct contact with children through the ASB implemented or financially supported projects and does not have a child protection/safeguarding policy in place and/or is not able to meet the child protection/safeguarding policy requirements set forth by donors, the ASB will, where possible, work with the sub- grantee, supplier/sub-contractor, or implementing partner by providing the support required to enable them to come into compliance.

## 7. Policy Management

### 7.1. Roles and responsibilities

All staff (including permanent staff, associates, contractors, partners, volunteers) is bound to the principles and guidance laid out in this policy and linked policies (see [Annex 9: Specific responsibilities for the Implementation of the policy](#)).

Specifically, **all staff**, as defined above, are expected:

- To use the required procedures

- To promote good practices and to contribute to discussions about child safeguarding
- To ensure that the voice of the beneficiaries, children and youth, to the protection of which the current Policy is targeted, is listened to and it is taken into account in daily work
- To respect the professional boundaries and code of conduct referred to in this document and fully comply with it

The **Management Team** is bound by this policy as described above, and has the additional responsibilities:

- To appropriately put the Child Safeguarding policy in place and to make sure that it is accessible to any person of concern
- To regularly monitor the implementation of this policy
- To regularly evaluate and assess the implementation of this policy
- To regularly review the policy based on the above findings
- To make sure that the sufficient resources are allocated to ensure that the policy can be effectively implemented
- To receive staff and beneficiaries' concerns regarding safeguarding seriously, swiftly and appropriately and to respond to all of them
- To actively promote the policy and include relevant provisions in the planning and design of projects and collaborations.

The **Senior Management Team** has the final responsibility for:

- The overall implementation, monitoring and review of the current policy
- The appointment of a principal contact- referral person

The **Focal Person** shall be responsible for:

- Receiving all safeguarding concern reports and collecting any data/ information available related to the reports
- Keeping an updated record of all safeguarding reports
- Communicating to the ASB Senior Management Team safeguarding concerns along with the data/ information he/she has collected in a timely manner (maximum 48 hours after receiving the initial report)
- Coordinating the required activities and procedures towards the effective implementation, monitoring, evaluation and review of the current policy (see Annex 9: Specific responsibilities for the Implementation of the policy).
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- Collecting and assessing all the data related to the overall implementation of the policy, providing feedback and formulating relevant suggestions to ASB Senior Management Team towards the continuous development of the policy (see [Annex 9: Specific responsibilities for the Implementation of the policy](#)).

## 7.2. Policy's main monitoring aspects

The main aspects of the Child Safeguarding policy that shall be monitored are related to:

- Safe recruitment process
- Staff training and support
- Staff awareness of the policy
- Assessment of the reporting and follow up procedures
- Risk assessment/ mitigation strategy index
- Policy revision and update based on the assessment of the above aspects

(see [Annex 9: Specific responsibilities for the Implementation of the policy](#) and [Annex 11: Child Safeguarding Self-Audit tool](#)).

### 7.3. Communication and commitment to the Child Safeguarding policy

#### 7.3.1. Ensuring beneficiaries' awareness

The ASB will make beneficiaries aware of the Child Safeguarding Policy, using appropriate means that are in line with the age and the specific profile of each beneficiary, so as to ensure that the principles and procedure of this policy are adequately understood. Indicatively, these means may be:

- Discussion and briefing with beneficiaries during community meetings about Child Safeguarding arrangements and concern/complain procedures
- Posters and other informative material in all the ASB offices and sites of operation
- Publication and communication of the Child Safeguarding policy through the ASB Greece website and social media

### 7.4. Regular review of the Child Safeguarding policy

The Child Safeguarding policy will be reviewed annually. The need for reviewing of the policy will be examined on a yearly basis, based on the monitoring and evaluation findings, as well as the general consideration of changes in the legislation, the social environment or any other significant event (see [Annex 9: Specific responsibilities for the Implementation of the policy](#)). Each year and at the commencement of this policy the CSP Focal Person will designate the following review period.

The process of review will take place in three steps –

- Needs Analysis, Feedback and Consultation
- Drafting and Amendment
- Approval and Endorsement

The Focal person with the support of the ASB Senior Management Team in collaboration with the Management teams will commence the procedure of review at a designated date. During the needs analysis, feedback and consultation phase, all staff members of the ASB and partners as well as beneficiaries' needs, and views and recommendations will sought and considered. The Focal person



Arbeiter-Samariter-Bund

Child Safeguarding Policy

will be responsible for the drafting of additional sections or amendments into the policy. These proposed changes will be reviewed by the Senior Management Team in order to finally be approved, endorsed and included in the reviewed policy.

## Annex 1: Abstract of the ASB Child Safeguarding Policy

### ASB Values, Principles and Beliefs

In accordance with Article 19 of the United Nations Convention on the Rights of the Child (UNCRC)<sup>15</sup>, ASB recognizes the right of all children to be protected from all forms of abuse and exploitation. The ASB further recognizes its responsibility to ensure that ASB projects, workers, and others working with or on behalf of the ASB do no harm to children. The ASB is committed to ensuring that our organizational policies, protocol, procedures, and actions reflect our commitment to fulfilling this responsibility.

The ASB recognises that all children have equal rights to protection from abuse, neglect, exploitation and violence, and that everyone has a responsibility to support the protection of children. We are therefore committed to the following:

1. **Promoting survival and development of children:** As well as children's right to life, right to protection from all forms of abuse, neglect, exploitation and violence, the ASB commits to identifying and taking concrete action to reduce the effects of the emergency and the response on the physical, psychological, emotional, cognitive, social and spiritual development of children. This includes family reunification, preventing family separation, promoting family-based environments, with interim care and durable solutions considered as secondary options based on the best interests of the child.
2. **Ensuring that all children in need benefit from the ASB programmes without discrimination<sup>16</sup>:** The ASB is committed to provide support to children, families and communities without distinction of any kind, such as race, colour, ethnicity, religion, sexuality, language, age, disability, gender, sex, political or other opinion, family circumstances, health, marital status, birth or other status. The ASB recognises that emergencies often magnify existing differences and further marginalise those already at risk of discrimination. The ASB is committed to identifying and monitor existing and new patterns of discrimination and power and tackle them in the response as part of its commitment to the "Do No Harm" principle. The ASB will also take special measures to ensure appropriate and adequate care is provided to children with disabilities, unaccompanied and separated children (UASC), child-headed households, children in conflict with the law, children associated with armed forces or armed groups (CAAFAG), and other marginalised groups.

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<sup>15</sup> United Nations Convention on the Rights of the Child, 1989. Article 19: 'State Parties shall protect the child from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse'. <http://www2.ohchr.org/english/law/pdf/crc.pdf>.

<sup>16</sup> Based on affirming ASB commitment to the United Nations Convention on the Rights of the Child (UNCRC) (1989); the Convention on the Elimination of all forms of Discrimination Against Women (CEDAW); the United Nations Convention on the Rights of Persons with Disabilities (2012); the ILO Convention No. 182 on the Worst Forms of Child Labour (1999); the Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography (2000); the Refugee Convention (1951); the Guidelines on Internally Displaced Persons; the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the UN Convention against Transnational Organized Crime; the Minimum Standards for Child Protection in Humanitarian Action; the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse; the IASC Six Core Principles Relating to Sexual Exploitation and Abuse. Also the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1987); the Guidelines on the Protection of Child Victims of Trafficking UNICEF technical notes; the ILO Convention on the Minimum Age for Workers (1973).

3. **Encouraging and enabling child participation in all activities concerning children and their communities:** The ASB is committed to ensuring that children of different ages and abilities are given space and time to meaningfully participate. Personnel of the ASB and partners must be aware of their own values, beliefs and assumptions about childhood and the roles of the child and the family and avoid imposing these on children. They should enable developmentally appropriate ways of child participation, share power with children in decision making, and be sensitive to how children's participation can, when done poorly, upset children's social roles and exposure to harm.
4. **Ensuring that the best interests of the child are paramount:** In all actions concerning children, the best interests of the child will be a primary consideration. This principle should guide the design, monitoring, and adjustment of all humanitarian programmes and interventions. Where the ASB takes decisions regarding individual children, this needs to be based on the Best Interest Determination (BID) process.
5. **Promoting sensitivity to local culture and adherence to the UNCRC:** The ASB is committed to respecting local customs and culture, whilst at the same time honouring and promoting the fundamental rights belonging to children as enshrined in the UNCRC. The ASB will consistently recognise children as those under the age of 18 years, even if the legal age of majority is at a lower age. The ASB will work to protect children from traditionally sanctioned forms of child harm, such as corporal punishment, Female Genital Mutilation (FGM) and early marriage.

#### **Key definitions**

**Child or Children**<sup>17</sup>: "A person under the age of 18, regardless of the age of majority or age of consent locally."<sup>18</sup>

**Child Beneficiary:** For the purpose of this policy, "child beneficiary" refers to all children who are targeted recipients – direct or through their family – of ASB implemented or financially supported projects.

**Child Safeguarding:** The set of policies, procedures and practices that we employ to ensure that ASB is a child safe organization. Child Safeguarding is making the ASB safe for children. It involves our collective and individual responsibility and preventative actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm by the ASB staff, associates and third parties, who come into contact with children or impact them through our development interventions, humanitarian responses and operations. This includes our direct program implementation, work through partners and management of children's personal data.

**Child Protection:** "The prevention of and response to abuse, neglect, exploitation and violence against children"<sup>19</sup>. Child protection means safeguarding children from harm. Child protection is not the protection of all children's rights, which is the responsibility of everyone working with children, but refers instead to a subset of these rights.

#### **Behavioural protocol**

The ASB is committed to ensuring that ASB Personnel and Associates, as well as visitors, conduct themselves in a way that is safe for children. These conducts naturally always relate as a minimum to working hours and work environments, but also extend beyond that, to off working hours and environments that are not work related.

The Personnel and Associates of the ASB are required to comply with the behavioural protocol outlined below.

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<sup>17</sup> "Child or Children" is not qualified only as a beneficiary child; rather, this term is inclusive of all persons under the age of 18.

<sup>18</sup> UN Glossary on Sexual Exploitation and Abuse, 5 October 2016.

<sup>19</sup> Minimum Standards for Child Protection in Humanitarian Action, Child Protection Working Group (CPWG) (2012).

At a minimum, Personnel and Associates of the ASB **should**:

- Promote child participation. Always listen to children and encourage children and their families to be involved in making decisions relating to their lives.
- Promote non-discrimination. Treat children equally, irrespective of the child's or his/her parents' race, colour, ethnicity, religion, sexuality, language, age, disability, gender, sex, political or other opinion, family circumstances, health, marital status, birth or other status.
- Deliver aid assistance to children and communities in ways which do not abuse your position of power, trust and authority.
- Be aware that physically touching a child, perhaps to offer comfort, can be misconstrued by observers or the child.
- Avoid situations which isolate children and where your behaviour cannot be observed such as in cars, offices and homes.
- Where possible and practical, follow the 'two-adult' rule while conducting work, where two or more adults supervise all activities that involve children, and are always visible and present. If this rule is not possible in practice, seek alternatives such as being accompanied by community members or interacting in open spaces.
- Promote a culture of openness where issues and concerns can be raised, discussed among staff, with children and communities.
- Ensure that all communications regarding children guarantee the protection, confidentiality, privacy, dignity and best interests of the child.
- Ensure when making images of children or their families (photos, video, etc.) that they are respectful, that people are adequately clothed and that sexually suggestive poses are avoided. No image where children and their families are identifiable can be made public through social media or other means without the informed consent or assent of the subjects (**see Section 5.5 Safe communication**).
- Report any child protection concern in a timely manner and in accordance with ASB established reporting procedures (**see Section 5.8 Reporting procedures**). In the case where it is known or it is suspected that a child is at risk or suffering abuse, take urgent action to report and, where necessary, refer the child to appropriate services.
- Comply with child protection related investigations (internal and external) and make available any documentary or other information necessary for the completion of the investigation.
- Challenge poor practices, and report potential risks which might lead to cause harm to children.

Moreover, the ASB Personnel and Associates **should never**:

- Smack, hit or physically abuse children, whether as a form of discipline or otherwise.
- Engage in any form of sexual relations with children or beneficiaries.
- Engage in any form of inappropriate physical behaviour such as kissing, hugging or touching a child.
- Use inappropriate words, offensive, threatening or intimidating behaviours that shame, humiliate, belittle or degrade children or engage in emotional abuse.
- Act in a manner or organise activities which are abusive or place children at risk of abuse.
- Spend excessive time alone with a child excluding him/her from others.
- Stay alone with children in a room with the door closed and where you cannot be seen by other people or invite a child / children to your place of residence.
- Develop abusive or exploitative relations with children, including hiring children for domestic or other labour.
- Condone or participate in activities where the child's behaviour is likely to lead to abusive or illegal acts.
- Discriminate through preferential treatment to a child (i.e. gifts, sponsorships, money, etc.).
- Use, download or buy pornography, or other photography or video, for sexual purposes.
- Take images of children (photos, video, etc.) which are detrimental or explicit and undermine the child's dignity.

- Share photos on social media where children and/or their families are identifiable, as this could potentially put children at serious risk.
- At any time make comments to the media on child protection matters except where the Country Director has previously been made aware of media interest and agreed the response in advance.
- At any time, breach confidentiality, informed consent or incident reporting procedures regarding a child protection incident or case.

All of the ASB personnel are obliged to adhere to these standards of behaviour. Failure to comply with these standards or failure to report child protection concerns is grounds for disciplinary action. This action may include termination of contract or summary dismissal and may result in the case being forward to the local authorities for criminal prosecution where appropriate and in accordance with applicable national laws. The standards set out above are not intended to be an exhaustive list. Other types of inappropriate behaviour towards children may be grounds for disciplinary actions as well. The ASB personnel must not engage in any form of humiliating, degrading or exploitative behaviour under any circumstances.

The ASB shall ensure that all ASB Employees are informed of their obligation to abide by the behaviour protocol outlined above. For this ASB shall include behaviour protocol in ASB staff orientation and training materials. All ASB Personnel will need to confirm in written that they have been instructed regarding this.

### **Safe communication**

The ASB has a duty of care towards the children with whom it comes in contact and at all times must put their best interests first. Children have the right to be accurately represented and the ASB accepts its responsibility not to portray a manipulated or sensationalized image of a child's well-being and circumstances. Children must be presented as human beings with their own identity and dignity preserved. All of the ASB personnel and associates need to be aware that photos and other identifying details of children and their families represent a risk to their safety and dignity, particularly in conflict and post-conflict situations. The "Do No Harm" principle must guide the collection and use of images and information about children and their families.

All of the ASB personnel and associates are obliged to adhere to the following standards of behaviour when recording and using images and stories of children and their families:

- Ensure when making images of children and their families (photos, video, etc.) that they are respectful, that people are adequately clothed and that sexually suggestive poses are avoided.
- Choose images and related messages based on values of respect and equality. Images should represent a broad range of children – boys and girls, and various ages, abilities and origin -and not present them as victims.
- Truthfully represent the particular situation both in its immediate and wider context.
- Avoid approaches that potentially stereotype or sensationalise people, situations or places.
- Ensure that people whose situation is being represented have the opportunity to communicate their stories themselves.
- Conform to the highest standards of children's rights (UNCRC) and encourage children to give their own accounts as much as possible, rather than letting others speak on their behalf.
- Take and use images and stories only with the full understanding and permission of the child or his/her parent/legal guardian/caregiver. The informed consent needs to be signed (or verbally agreed to) and filed in a secure location. No image and/or story where children and their families are identifiable can be made public through the ASB website or other means without the informed consent or assent of the subjects.
- Change the names of the subjects to protect their identity, unless they have explicitly stated a preference that their genuine name should be used, and security implications are not a factor.
- Do not disclose personal information (such as location) which could put children and their families at risk on the ASB website or in public literature.
- Report in a timely manner any complaint or concern about inappropriate or intrusive images through the same procedures as for reporting child protection concerns.



Arbeiter-Samariter-Bund

Child Safeguarding Policy

Social media generated by the ASB are subject to the same safe communication practices as outlined above.

## Annex 2: Guidelines for Safer Recruitment

Suggested wording for job advertisements:

“The successful candidate will be expected to comply with the following as a condition of employment:

- a. Providing the name, position and contact information of at least two references, including the last line manager and excluding family members.
- b. Signing a personal declaration stating any criminal conviction, including spent convictions.
- c. Getting a satisfactory clearance through a criminal record check.
- d. Accepting and committing formally to the “ASB Child Safeguarding Policy and the ASB Protection from Sexual Exploitation and Abuse Policy.”

Guidance on addressing Child Safeguarding and Protection from Sexual Exploitation and Abuse issues in interviews:

During the interview process, candidates should be asked about their awareness of and attitude towards Child Safeguarding and Protection from Sexual Exploitation and Abuse. Remember that abusers look completely ‘normal’, are often very skilled at deception, salesmanship and ‘grooming’ (of organisations, as well as children and individuals).

- All personnel who would be hired or employed to work directly with children and/or vulnerable individuals should be interviewed face-to-face or through skype using video link for at least one of the interviews, where possible.
- The interview panel should pay attention to and make a clarification of the following issues:
  - Gaps in employment history if the candidate worked for a protection-focused organisation before.
  - Frequent changes of employment, if the candidate worked directly with children and/or vulnerable individuals before, ask the reason for leaving.
- The following specific questions should be included in the HR interview:
  - Are you aware of the ASB Child Safeguarding and Protection from Sexual Exploitation and Abuse Policies? Considering the position, you applied for, which are according to you the responsibilities you will have towards these policies?
  - For positions dealing with children specifically: When might it be appropriate and inappropriate to be alone with a child? When and how might it be appropriate to comfort a child?
  - Have you ever worked anywhere where colleagues were alleged of child abuse or SEA? If yes, what happened and how was the allegation handled? Would you have handled it differently yourself? If not, how would you handle a complaint, concern or suspicion of child abuse or SEA by a colleague?
  - Is there anything we might find out during the reference check that you would like to talk about?
- During the HR interview, the candidate should be informed that:
  - ASB takes seriously all issues of protection, including Child Safeguarding and PSEA.
  - References will be checked on any allegation of child abuse or SEA.
  - If successful, the candidate will be required to sign up to the ASB Child Safeguarding and PSEA Policies.
- The following warning signs should be taken into consideration (including, but not limited to and based on common sense):
  - Strange or inappropriate questions / statements about children and/or women
  - Interest in spending time alone with children / in working with children of a particular age or gender.

Guidance on addressing CP and PSEA issues in reference checks:

For positions dealing with children and/or vulnerable individuals, where possible it is advisable to speak directly by phone to references to ask questions related to Child Safeguarding and PSEA. In this case, notes of the reference's comments should be taken and placed on the personal file of the candidate.

In all cases, the reference check will be an integral part of the recruitment process. References should be asked about their relationship with the candidate – this has often revealed that the reference only has a small amount of knowledge about the candidate – and the following specific questions:

- Do you know of any issue or incident involving the candidate and his/her contact with children?
- Do you know of any SEA issue or incident involving the candidate?
- Do you know of any dismissal or pending investigation into the candidate's behavioural misconduct?
- What is your opinion on the suitability of the candidate to have direct contact with children and/or vulnerable individuals?

References should also be asked to confirm that there are no child abuse or SEA investigations pending or validated regarding the candidate they are aware of.

Guidance on conducting criminal record checks before formalising collaboration:

The HR department is responsible to conduct a complete criminal record check of all candidates, prior to their hiring, requesting and based on:

- Proof of identity (national ID document or passport).
- An original criminal record certificate (issued maximum 3 months before the recruitment).
- Personal declaration stating any criminal conviction, including spent convictions (see Annex 3: Declaration of Criminal Convictions).

Guidance on addressing Child Safeguarding and PSEA issues in internal performance reviews:

A category of performance regarding the "Adherence to Safeguarding Policies" should be included in both the Staff Performance and the Staff Self-Evaluation Forms. Specifically, the following aspects should be rated from 1 (performance at an insufficient level of effectiveness) to 5 (performance at an exceptionally high level of effectiveness) by both the supervisor and the staff member himself/herself:

- Actively promotes the ASB Child Safeguarding Policy.
- Actively promotes the ASB Protection from Sexual Exploitation and Abuse Policy.
- Adheres to and promotes safe communication practices.
- Adheres to and promotes data protection and sharing protocols.

In the section "Overall Performance and Career Development" of the Staff Performance Form, the supervisor should also be asked to comment on the staff member's commitment to comply with and promote implementation of the safeguarding policies; while in the "Other Comments" section of the Staff Self-Evaluation Form, the staff member should be asked to describe what actions he/she has taken to promote the safeguarding policies, highlighting any gap or challenge faced in implementation and adherence to these policies.

### Annex 3: Declaration of Criminal Convictions

Do you have any prosecution pending, or have you ever been convicted, bound over or cautioned by the police or received a formal reprimand or final warning for any offence, including road traffic offences?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please provide details, including those prosecutions or convictions considered spent, and declare any previous investigation or allegation made against you. These will be kept confidential by the ASB relevant staffs that will assess whether they pose any risk or not in relation to child safeguarding or protection from sexual exploitation and abuse.

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“I, the undersigned, hereby declare that the information I have provided is complete and true, and I understand that to make a false statement knowingly may result in termination of any agreement held between myself and the ASB”

Signature of the Employee/Collaborator: \_\_\_\_\_

Name of the Employee/Collaborator: \_\_\_\_\_

Date: \_\_\_\_\_

For the ASB:

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_



Arbeiter-Samariter-Bund

Child Safeguarding Policy

## Annex 4: Declaration of Agreement to be Bound by and Uphold the ASB Child Safeguarding Policy and the ASB PSEA Policy for Personnel

I, the undersigned \_\_\_\_\_, hereby acknowledge that I have received, read and understood the ASB Child Safeguarding Policy and the ASB Protection from Sexual Exploitation and Abuse Policy, and pledge to abide by the expectations and provisions therein.

I am fully aware that should I fail to comply with these policies and related standards of behaviour, I will be liable to suspension, summary dismissal and/or face legal implications commensurate to the offence/crime I will have committed.

I testify that I have no prior criminal record in any country related to child abuse or sexual exploitation and abuse, and I have never been involved in any form of child abuse or sexual exploitation and abuse before. I commit to respect and promote implementation of these policies at all times while under collaboration with ASB by the way I conduct myself and by reporting any violation of the related standards of behaviour that come to my knowledge.

To show my acceptance and commitment to comply with the ASB Child Safeguarding Policy and the ASB Protection from Sexual Exploitation and Abuse Policy, I hereby sign this declaration form.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Place: \_\_\_\_\_

Date: \_\_\_\_\_

Relationship with ASB: \_\_\_\_\_

Relationship categories include:

- Current Staff
- Prospective Staff
- Volunteer / Intern
- External partner
- Other (specify)

## Annex 5: Declaration of Agreement to be Bound by and Uphold the ASB Child Safeguarding Policy for Partners

\_\_\_\_\_ (NAME OF THE ENTITY) hereby acknowledges that it has received and read a copy of the ASB Child Safeguarding Policy.

\_\_\_\_\_ (NAME OF THE ENTITY) agrees that all children have equal rights to protection from abuse, neglect, exploitation and violence, and that everyone has a responsibility to support the protection of children.

\_\_\_\_\_ (NAME OF THE ENTITY) accepts and commits to actively prevent acts of child harm by its personnel and associates, and to respond to child protection incidents that are perpetrated against children in compliance with the ASB Child Safeguarding Policy.

\_\_\_\_\_ (NAME OF THE ENTITY) ensures that no personnel hired, deployed or engaged in projects implemented in partnership with ASBS or with the support of the ASB, have ever been involved in any form of abuse, neglect, exploitation and violence against children before.

\_\_\_\_\_ (NAME OF THE ENTITY) ensures that all personnel hired, deployed or engaged in projects implemented in partnership with ASB or with the support of ASB, will participate in trainings on the content of the ASB Child Safeguarding Policy and related standards of conduct organised by ASB.

\_\_\_\_\_ (NAME OF THE ENTITY) is fully aware to be liable to suspension or cancellation of the partnership agreement or sub-agreement with the ASB should any of its personnel member or associate be found in breach of the ASB Child Safeguarding Policy standards of behaviour, and the concern be mishandled.

Signature: \_\_\_\_\_  
 Name: \_\_\_\_\_  
 Position: \_\_\_\_\_  
 Place: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 On behalf of: \_\_\_\_\_

Signature: \_\_\_\_\_  
 Name: \_\_\_\_\_  
 Position: \_\_\_\_\_  
 Place: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 On behalf of ASB: \_\_\_\_\_



Arbeiter-Samariter-Bund

Child Safeguarding Policy

## Annex 6: Declaration of Agreement to be Bound by and Uphold the ASB Child Safeguarding Policy Standards of Behaviour for Visitors

I, the undersigned \_\_\_\_\_, hereby acknowledge that I have received, read and understood the abstract of the ASB Child Safeguarding Policy. I declare that I have been briefed about and given every opportunity to discuss both the principles and the standards of behaviour contained therein with an ASB representative.

I accept and commit to comply with these principles and standards of behaviour at all times while visiting ASB and/or ASB partners' programme activities.

I am fully aware that should I be found in breach of the ASB Child Safeguarding Policy standards of behaviour, ASB can take the initiative to suspend or terminate my visit, and forward the case to the police or local authorities for prosecution where possible criminal acts have been committed.

Signature:

\_\_\_\_\_

Name:

\_\_\_\_\_

Position:

\_\_\_\_\_

Place:

\_\_\_\_\_

Date:

\_\_\_\_\_

Signature:

\_\_\_\_\_

Name:

\_\_\_\_\_

Position:

\_\_\_\_\_

Place:

\_\_\_\_\_

Date:

\_\_\_\_\_

On behalf of ASB:

\_\_\_\_\_

## Annex 7: Informed Consent for Communication

**Definition:** Informed consent is the voluntary agreement of an individual who has the capacity to give consent, and who exercises free power of choice. To provide “informed consent”, individuals must be able to understand and take a decision regarding their own situation.

**Practice:** Informed consent may be sought from an adult, a child or a child’s parent/legal guardian/caregiver, according to the age of the child and his/her level of maturity. As a guide, informed consent should be sought from the child when the child is deemed mature enough to understand. Usually 15-17 year olds should be able to give oral or written informed consent. For younger children, decisions should be made on a case-by- case basis.

If the interviewer decides that the child cannot fully understand the content of the informed consent, written informed consent should be sought from a parent, legal guardian or caregiver. In all cases, even for very young children (i.e. those aged under 5 years) efforts should be made to explain in simple language appropriate to the age why information is being sought and what it will be used for, including how it will be shared. This prevents potential conflict between the information collector and the informant.

Discussions to gain informed consent should generally detail: the purpose, nature, method and process of information collection; the role and rights of the informant; and the potential risks and benefits. It should also ensure the accuracy and confidentiality of the information. Consent can be obtained verbally or in written form, and should include the full name and signature (where possible) of the informant and the date (unless this information is kept separately for confidentiality reasons).

**Informed Consent Form for Parents, Legal Guardians or Caregivers of Children Aged Under 15 Years being Interviewed**

My name is \_\_\_\_\_ . I am willing to participate in talking to a person or a group of people from \_\_\_\_\_ (NAME OF THE ENTITY).

They may ask me about my experiences and feelings about my life, and I am willing to answer their questions if I feel comfortable to. I am allowed to refuse to answer some of the questions. I know that this person/group of people will record my photograph and my story in writing or using a voice recorder. I am happy for them to do this but I can change my mind and stop the recording when I feel uncomfortable at any time. I understand that I will not be identified in any way in reports or publicity.

I know that the information I will provide may be used for public purposes such as in local and international newspapers, books, websites and/or radio and television stations. I am comfortable about it, but I can change my mind after the talk if I think I do not want many people to know me.

I also know that this person/group of people will not use my real name or show my face when presenting my story to other people.

I know that there is no promise of any money or reward to be given to me. I am the one who has decided to allow or not to allow this person/group of people to talk to me.

\_\_\_\_\_  
Signature of the Informant

\_\_\_\_\_  
Date

I believe the information given to be correct and the informant consent genuine to the best of my knowledge.

\_\_\_\_\_  
Signature of the Interviewer

\_\_\_\_\_  
Date

*[The following is necessary if the consent form must be read to the informant]:*

I certify that I have read this consent form in full to the informant whose signature appears above.

\_\_\_\_\_  
Signature of the Interviewer

\_\_\_\_\_  
Date

**Informed Consent Form for Parents, Legal Guardians or Caregivers of Children Aged Under 15 Years being Interviewed**

My name is \_\_\_\_\_ . I give permission for my child  
\_\_\_\_\_ (NAME OF THE CHILD) to take part in the interview being  
carried out by \_\_\_\_\_ (NAME OF THE INTERVIEWER) from  
\_\_\_\_\_ (NAME OF THE ENTITY).

I have received a full explanation from the interviewer about the purposes of this interview, what my child may be expected to do during the interview and how the information will be used.

I understand that the interviewer will record my child's photograph and story in writing or using a voice recorder.

I understand that my child will not receive any money or reward as a result of taking part in the interview.

I also understand that if at any time I am not happy with my child taking part in the interview, I can withdraw my child from the interview process.

I certify that I am the parent, legal guardian or caregiver of the child named above.

\_\_\_\_\_  
Signature of the Parent/Legal Guardian/Caregiver

\_\_\_\_\_  
Date

I believe the information given to be correct and the parent/legal guardian/caregiver consent genuine to the best of my knowledge.

\_\_\_\_\_  
Signature of the Interviewer

\_\_\_\_\_  
Date

*[The following is necessary if the consent form has to be read to the parent/legal guardian/ caregiver of the child]:*

I certify that I have read this consent form in full to the parent/legal guardian/caregiver whose signature appears above.

\_\_\_\_\_  
Signature of the Interviewer

\_\_\_\_\_  
Date

## Annex 8: Child Safeguarding Incident Reporting Form

If you have seen an actual incident or suspect and have cause for concern regarding an incident of child abuse, please follow the guidelines and fill out the questions below where appropriate. It is important that you identify in this form whether it is an actual incident or a suspected incident.

 Arbeiter-Samariter-Bund <b>Child Safeguarding Incident Report</b>
<b>Reporting person's details:</b> Name: Position: Contact details:
<b>Incident's details:</b> Has the incident been seen or is the incident suspected? Who has disclosed the incident to you? Date and time of the alleged incident: Location of the alleged incident: Description of the alleged incident: Was there any other individual involved in the alleged incident? If so, who? Was there any witness? If so, who?
<b>Alleged perpetrator's details:</b> Name: Relationship with ASB: Position:
<b>Observations (physical injuries or other comments):</b>
<b>Actions taken:</b>
<b>Date/ time of the report:</b>
<b>Signature:</b>

## Annex 9: Specific responsibilities for the Implementation of the policy

 Arbeiter-Samariter-Bund <b>Specific Responsibilities for the Implementation of the Policy</b>	
<b>Responsibility</b>	<b>Action</b>
<b>Managers and Senior Management Team</b>	Should ensure that the country office has in place local procedures are consistent with the Child Safeguarding Policy to prevent and respond to incidents of child abuse.
<b>Managers</b>	Must ensure that all new employees receive a copy of the Child Safeguarding Policy, Protection from Sexual Exploitation and Abuse Policy and Code of Conduct, prior to or at the time of issuing an employment contract. They must read, sign and return copies of the policy to show that they are aware of and agree to act in accordance with the Policies. Signed copies must be place in their personnel file.
<b>Managers</b>	Must ensure that all new employees receive child safeguarding policy training as part of their induction programme, and all staff receive child safeguarding training which is relevant and appropriate to their engagement with the organisation.
<b>Officers and Managers</b>	Must ensure that all associates in their area of responsibility, are informed of and have signed up to the Child Safeguarding Policy while working for the organisation. In addition, that associates sign up to either the organisation’s Code of Conduct or to guidance on appropriate behaviour towards children that is appropriate to their engagement with the organisation and is developed by the manager using the Code of Conduct as a guide.
<b>Officers and Managers</b>	Must ensure that all visitors in their area of responsibility, who are in contact with children through the organisation, are provided with and have signed and returned a copy of the Child Safeguarding Policy. Visitors should be informed that they must comply with the policy in all contacts and communications with children during their visit.
<b>Officers</b>	Must ensure that children and families with whom the organisation works are aware of the Child Safeguarding Policy and applicable local procedures, so that they know what behaviours they can expect from staff, associates and visitors and whom to report any concerns.
<b>Officers</b>	Must ensure that protective measures which guide the implementation of the Child Safeguarding Policy are fully embedded within their areas of responsibility as it applies to them.

<p><b>Managers and Senior Management Team</b></p>	<p>Must ensure that those who have reported child safeguarding concerns or are accused of child abuse are given appropriate care, support and protection in dealing with all aspects of the case including any safety concerns and potential reprisals which may arise from the incident or from the reporting of such concerns.</p>
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Annex 10: Risk assessment

 Arbeiter-Samariter-Bund Risk Assessment Index				
Areas of risk	Risk factors	Risk significance	Mitigating strategy	Actions to implement
Context, scope and setting				
Contact with children				
Staff				
Partners				
Associates				
Services				
ICT				
Communications				

## Annex 11: Child Safeguarding Self-Audit tool

 Arbeiter-Samariter-Bund  <b>Child Safeguarding policy Self-Audit tool</b>			
Please tick <b>A</b> , <b>B</b> or <b>C</b> , after reading each statement and deciding whether each standard is: <b>A</b> (in place), <b>B</b> (working towards) or <b>C</b> (not in place)			
<b>Standard 1: Policy</b>	<b>A</b>	<b>B</b>	<b>C</b>
The organisation has a written child safeguarding policy, approved by the relevant management body, to which all staff and associates (including partners) are required to adhere.			
The UN Convention on the Rights of the Child and other Conventions and Guidelines pertaining to children informs the policy of the organisation.			
The policy is written in a way that is clear and easily understandable and is publicised, promoted and distributed widely to all relevant stakeholders, including children.			
The policy is clear that all children have equal rights to protection and that some children face particular risks and difficulties in getting help, because of their ethnicity, gender, age, religion or disability, sexual orientation.			
The policy addresses safeguarding children from harm through misconduct by staff, associates and others, from poor practice, and from its operational activities where these may harm children or put them at risk due to poor design and/or delivery, for example.			
The organisation makes clear that ultimate responsibility for ensuring the safety of children rests with senior executives (CEO and Directors) and managers.			
<b>Standard 2: People</b>	<b>A</b>	<b>B</b>	<b>C</b>
There are written guidelines for behaviour (Code of Conduct) that provides guidance on appropriate/expected standards of behaviour towards children and of children towards other children.			
All members of staff, volunteers and associates have training on child safeguarding which includes an introduction to the organisation's child safeguarding policy and procedures and learning on how to recognise and respond to concerns about child abuse.			
The organisation is open and aware when it comes to child safeguarding matters so that issues can be easily identified, raised and discussed. Staff, partners and associates need to have access to advice and support where concerns or incidents arise. These staff will also need to be able to identify sources of support for children and their families.			

Children are made aware of their right to be safe from abuse and provided with advice and support on keeping themselves safe including information for children, parents/carers about where to go for help.			
The organisation designates key people at different levels (including Director level) as “focal points” with clear defined responsibilities, to champion, support and communicate on child safeguarding and for effective operation of the child safeguarding policy.			
Partner organisations are required and supported to develop minimum child safeguarding measures appropriate to their organisation.			
<b>Standard 3: Procedures</b>	<b>A</b>	<b>B</b>	<b>C</b>
The organisation requires local mapping exercises to be carried out that analyse the legal, social welfare and child protection arrangements in the context in which it works.			
There is an appropriate process for reporting and responding to child protection incidents and concerns that fits with the local systems for dealing with incidents of child abuse (as identified in the mapping exercise).			
The identification and mitigation of child safeguarding risk is incorporated into risk assessment processes at all levels, i.e. from identification of corporate risks through to planning an activity involving or impacting on children.			
Adequate human and financial resources are made available to support development and implementation of child safeguarding measures.			
There are clear procedures in place that provide step-by-step guidance on how to report safely which are linked to the organisations disciplinary policy and procedures.			
Child safeguards are integrated with and actively managed into existing business processes and systems (strategic planning, budgeting, recruitment, programme cycle management, performance management, procurement, etc.) to ensure safeguarding children is a feature of all key aspects of operations.			
<b>Standard 4: Accountability</b>	<b>A</b>	<b>B</b>	<b>C</b>
Arrangements are in place to monitor compliance with and implementation of child safeguarding policies and procedures through specific measures and/or integration into existing systems for quality assurance, risk management, audit, monitoring and review.			
There is a system of regular reporting to key management forums, including Director level, to track progress and performance on child safeguarding, including information on safeguarding issues and child protection cases.			
External or independent bodies such as Board of Trustees, oversight committees are used to monitor performance in this area and hold senior executives to account in relation to child safeguarding.			

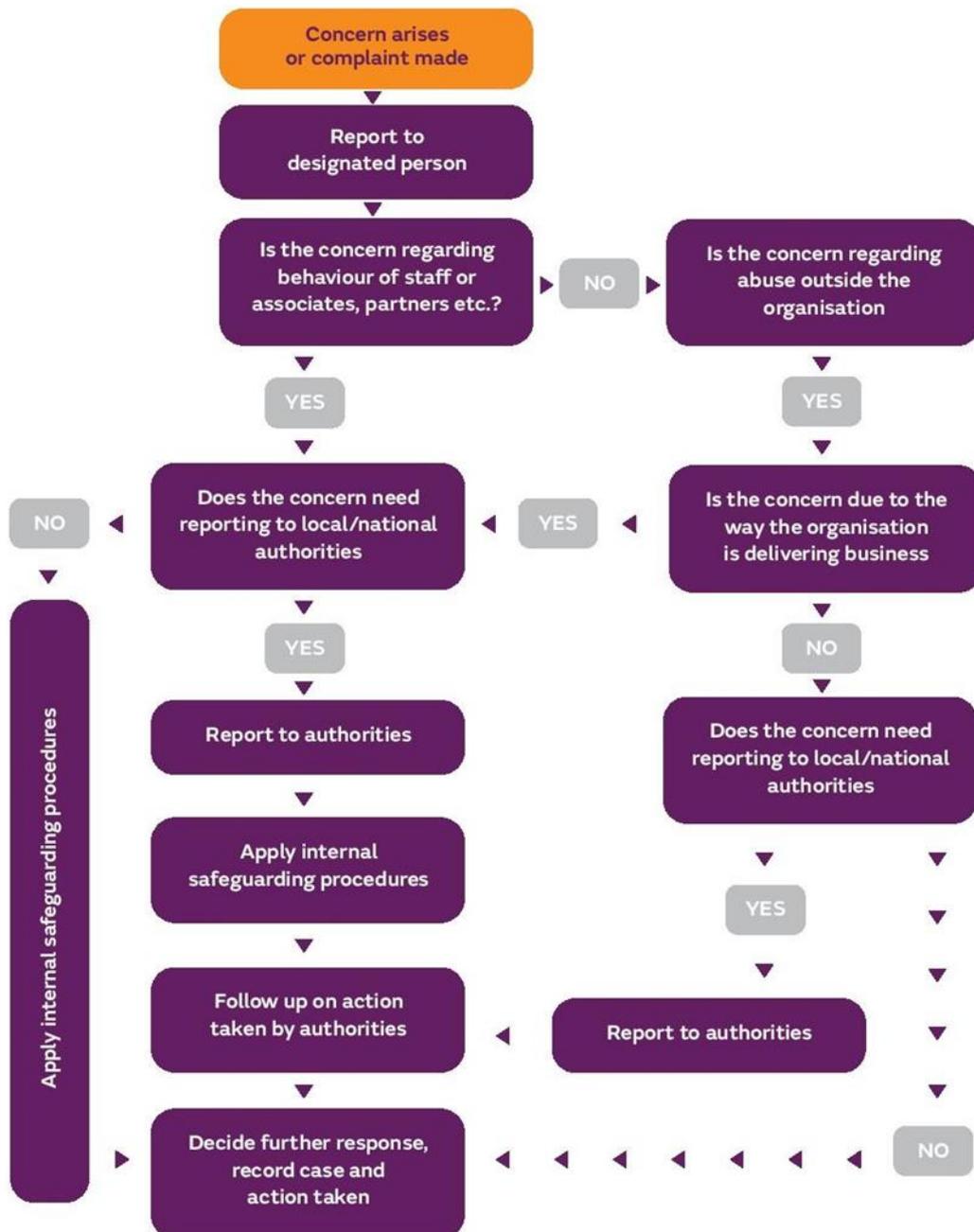


Arbeiter-Samariter-Bund

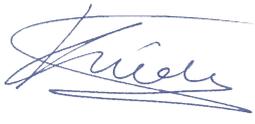
Child Safeguarding Policy

Opportunities exist for learning from practical case experience to be fed back into organisational development.			
Policies and practices are reviewed at regular intervals and formally evaluated every three years.			
Progress, performance and lessons learnt are reported to key stakeholders (management forums and external or independent bodies where relevant) and included in organisations' annual reports.			

## Annex 12: ASB Child Safeguarding Reporting and Response Procedure



### Annex 13. Appointment of Focal Point/ Back Up Focal Point and CSP incident review panel members

 Arbeiter-Samariter-Bund <b>Child Safeguarding Policy Focal Points</b>			
<b>Role</b>	<b>Name</b>	<b>Job title</b>	<b>Signature</b>
<b>Child Safeguarding Policy Focal Point</b>	<b>Nicole Petalidou</b>	<b>Protection Manager</b>	
<b>Child Safeguarding Policy Back Up Focal Point</b>	<b>Dimitrios Georgoulis</b>	<b>Compliance Manager</b>	
<b>Incident Review Panel Member</b>	<b>Kimon Ioannides</b>	<b>Program Coordinator</b>	
Updated and approved by the ASB Country Director on			

*\* The Child Safeguarding Policy Focal Point and the Child Safeguarding Back Up Focal Point along with the Compliance Manager consist the members of the CSP Incident Review Panel. There are appointed after the Senior Management Team's decision, on a yearly basis following the policy's regular review or in case of any other event making the change of Focal Persons necessary.*