



**POLICIES AND PROCEDURES**

**CHILD SAFEGUARDING AND CHILD PROTECTION POLICY**

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Person responsible for the Safeguarding Policy: Social Unit Coordinator

Deputy responsible for the Safeguarding Policy: Deputy Social Unit Coordinator,  
responsible for Athens

For additional information, please contact GCR focal points at

[safeguarding@gcr.gr](mailto:safeguarding@gcr.gr)

To report an incident or raise your concern please fill in the online form available  
here: <https://forms.office.com/e/f6H2bWpG1T>

or send your email at: [safeguarding@gcr.gr](mailto:safeguarding@gcr.gr)

Any communication regarding this matter will be dealt with complete  
confidentiality.

## 4. SAFEGUARDING POLICY & GUIDELINES FOR CHILD SAFEGUARDING

### 4.1. Policy statement

- GCR acknowledges that all people have the right to live a life free from abuse and exploitation and is committed to uphold these rights by implementing and maintaining a robust system of safeguarding.
- GCR is fully committed to the protection of vulnerable persons, young and old and will not tolerate any form of abuse or exploitative acts being perpetrated by our employees, volunteers or anyone associated with the delivery of our programmes.
- Employees and managers are bound to uphold this policy and to report people or incidents that they believe contravene it.
- We recognise our responsibility to take all reasonable steps to promote safe practice and to create a working culture and environment in which children, young people, vulnerable adults and those who participate in or receive support from our organization are protected from abuse. BoD Members, staff, volunteers and visitors are encouraged and supported to work together to ensure an ethos that embraces difference and diversity and respects the rights of all vulnerable people.
- We acknowledge our duty to respond appropriately to any allegations, reports or suspicions of abuse (neglect, physical, sexual or emotional harm) and that appropriate disciplinary measures are taken.

### 4.2. Child safeguarding policy

GCR is committed to implementing its programs and operating in a manner that is safe for children as well as for ensuring their protection. It is expressly prohibited for all GCR employees, volunteers and partners to participate in any activity that may lead to child abuse. In addition, GCR is committed to creating and maintaining an environment that aims to prevent and any actions or omissions, intentional or unintentional, that put children at risk of any kind of abuse. This is the GCR policy and the following policies and procedures apply accordingly.

Employees, volunteers, partners and members of the Board of Directors must meet the following conditions to ensure transparency in the protection of children:

- a. The ESP reserves the right to check the criminal records and other available information of prospective employees before they join the organization, especially regarding positions that have direct contact with minors.
- b. All employees and volunteers will receive a copy of the ESP's Child Protection Policy, which they will sign, indicating their agreement with said policy, before having any contact with children.
- c. Employees and volunteers will attend the Training on the P.P. Policy within 6 months of joining the organization and also, the Management members must attend a refresher course, every two years.

Furthermore,

The Director, Coordinators, and Deputy-Coordinators, of all Services and Heads of Departments and Offices are responsible for ensuring that the above-mentioned a, b, c will be carried out by the individuals/teams of their responsibility.

The incident report (attached as Appendix 1) may be completed by anyone who observes and/or suspects an incident of child abuse or any violation of the policies and procedures outlined in this document.

The report will be sent to the focal point of the Child Protection Policy.

Agreements with external partners shall include these Policies and Procedures as an appendix and must include a provision in which the Partner agrees to be aware of and comply with them.

### **4.3. Definitions**

For the purposes of this policy:

- **A child or young person** is defined as anyone under the age of 18.
- **Child abuse** is defined as a situation where individuals, agencies or processes act or fail to act in a way that directly or indirectly harms children or harms

their prospects for safe and healthy development into adults. The main forms of child abuse are physical abuse, emotional abuse, neglect or maltreatment, sexual abuse and sexual exploitation, as defined below:

- **Physical abuse:** The use of physical violence that causes actual or potential physical injury or suffering (e.g. hitting, shaking, burning, female genital mutilation, torture).
- **Emotional abuse:** Any humiliating or degrading treatment such as name-calling, constant criticism, belittling, persistent humiliation and isolation.
- **Neglect/maltreatment:** Persistent failure to meet a child's basic physical and/or psychological needs, for example by not providing adequate food, clothing and/or shelter, failing to prevent harm, failing to provide adequate supervision, or not ensuring access to appropriate medical care for treatment.
- **Sexual exploitation:** Any abuse, or attempted abuse, of another person's vulnerability, or position of power or trust, for sexual purposes, including but not limited to profit and/or social or political gain resulting from the sexual exploitation of people.
- **Sexual abuse:** Sexual abuse refers to the child's participation in sexual activity for which there is a lack of conscious understanding of the meaning and content of the act on the part of the child and a lack of consent.

#### **4.4. Communications about Minors (on the media, at the public)**

- A. Communication materials (including interviews, photos, videos, etc.) should not reveal personal information about the child, e.g. his/her full name or address and location. Attention should be paid to the rights of children, respect for their best interests should be demonstrated, risks to children should be considered when recording information (e.g. humiliation, revenge, legal prosecution, etc.). It should be ensured that the organisation's communication material does not put them at risk.
- B. Informed and non-coerced consent should be obtained from the child and both of his/her guardians (if any) for interviews, videos and photographs.
- C. External partners involved in visits or implementation of program activities

involving children are subject to the same policies and procedures described in this form.

All external partners are expected to behave in a manner consistent with this commitment and obligation.

Any exceptions to any part of this policy and procedures require written approval from the Child Protection focal point or Director.

Note:

Any breach of this policy and procedure will be treated as serious misconduct and will result in disciplinary action, including termination of contract and any other available legal remedies.

The same obligation applies to any person who becomes aware of any violation of these policies and procedures and fails to report it.

#### **4.5. Controls, Information, Education**

GCR is committed to supporting employees in understanding this Policy and related documents and providing the opportunity to discuss the issue in a supportive environment.

GCR will appoint a senior management officer to ensure the implementation of the Policy. He/she will be the respective Coordinator of the Social Unit or the Social Unit Deputy Coordinator, or a person who replaces him/her.

If anyone within GCR has any questions or concerns about child protection, they should raise them with the Social Unit Co-ordinator.

#### **4.6. Liability and Support**

Under no circumstances should concerns about abuse and misconduct be ignored. The need to ensure the immediate physical and psychological safety of a minor beneficiary should always be the number one priority. Reporting concerns can help ensure that appropriate and practical guidance can be provided.

All GCR employees, volunteers and partners are therefore required to report any

suspicions, allegations or acts they have been present at, even if uncertain, that may in any way breach the Child Protection Policy, following the reporting guidelines.

In responding to concerns raised regarding the protection of minors, the best interests of the child will always remain paramount. In other words, decisions will be made in order to ensure the best possible outcome for the child himself/herself.

#### **4.7. Compliance with the Policy**

GCR does not tolerate any form of harassment or intimidation. GCR promotes dignity and respect at work for all its employees and requires everyone to behave in a manner that encourages a non-hostile, friendly work environment.

**Board members, employees, volunteers and partners will be informed of and have access to this policy. It is an essential part of the Code of Conduct for employees. Also, training in this policy will be provided at regular intervals to all employees.**

#### **4.8. Guidance on Reporting Allegations or Incidents of Abuse**

BoD Members, staff, volunteers and visitors have a responsibility to **be aware of and alert to signs that all is not well with a child/ vulnerable person**. However, they are not responsible for diagnosing, investigating or providing a therapeutic response to abuse. It is also not the responsibility of the member of staff to whom the allegation is made to ascertain whether or not it is true. It is his/her responsibility to report the concern via the process outlined in this policy.

There are two main ways in which an allegation or suspected incident of abuse may be identified.

- Incidents of suspected abuse may be observed by a GCR BoD Member, staff, volunteer or visitor.
- Allegations or incidents of abuse may be disclosed by a vulnerable person to a GCR BoD Member, staff, volunteer or visitor.

When a report is received or anxiety is first expressed, the seriousness or extent of abuse is often not clear. In addition, not all concerns relate to abuse, there may well be

other explanations. It is therefore important, when considering the appropriate intervention, to deal with reports of incidents or allegations with an open mind. BoD Members, staff, volunteers or visitors who are concerned that something is wrong must act immediately and raise the issue with their Deputy Coordinator or Head of their Unit or HR Manager.

#### **4.9. Incident report**

It is important that all GCR workers are alert to the possibility that a child/ or vulnerable person may wish to disclose criminal acts and abuse and where this occurs support should be considered, through access to external (to the GCR) legal aid.

GCR staff should always explain to the complainant that they cannot keep the complaint secret, but can assure them that only those who need to know about the matter will be informed. Also, that this information is transmitted hierarchically and exclusively to the competent persons, and that if necessary it will be given to the authorities in accordance with the applicable legislation.

#### **4.10. Incident reporting and management process**

When responding to concerns raised regarding the protection of children and/or vulnerable people, their best interests should always be the priority. In other words, decisions should be made with a view to ensuring the best possible outcome for the vulnerable person himself/herself.

All incidents or concerns should be recorded on the attached form and will be kept in a secure electronic and physical file accessible to the Coordinators, Human Resources Officer, Director and President of the Board.

Any incidents or concerns will be raised and discussed with the relevant coordinators.

The Safeguarding focal point, the Coordinators in consultation with the Director and Human Resources Officer will decide on appropriate actions. Depending on the circumstances and the seriousness of the incident, the relevant police, prosecutor and state social authorities will be informed.

If it is decided not to make a formal report to the police or state social services, then this decision must be recorded (including the full reason behind the decision not to report the incident to the police or state authorities), archived and signed by the above, i.e. the Policy focal point or the Human Resources Officer. The President of the Board of Directors should always be informed by the Safeguarding focal point about each incident as well as the related management decisions.

In the event of an investigation of an incident by the authorities (that involves a GCR staff), GCR may suspend the staff involved, from any activity or association with the GCR pending the outcome of the investigation.

If such an investigation concludes that a criminal act has been committed either within or outside the scope of their employment, GCR will take immediate disciplinary action and any other action it deems appropriate. The GCR will decide on a case-by-case basis whether the reported incident will also be disclosed to the funder or donor, if this affects the reputation of the GCR or the funder/donor.

The investigation process of the incident will determine whether the necessary and prescribed measures of the GCR Code of Conduct will be imposed.

Following an incident or allegation, the GCR will take the necessary steps to ensure that the alleged victims, children/ vulnerable people, are protected from the possibility of further harm.

Following an incident or allegation, supervision and support will be provided to the GCR staff by the Social Unit Coordinator.

In investigating and assessing any concerns or complaints, the process should always be fair and any adverse decision may be appealed through appeal to the GCR Board of Directors.

#### **4.11. Whistleblowing**

GCR ensures that safe, appropriate and accessible means of reporting safeguarding concerns are made available to staff, volunteers, program beneficiaries, etc. and that any staff member or volunteer reporting concerns or complaints will be protected according to the whistleblowing policy.

#### **4.12. Behavioural protocols to minimise risks to (accusations of) abuse**

As part of GCR's Child protection and safeguarding policy all staff, volunteers and visitors to GCR are required to adhere to these child safeguarding standards and behaviors.

##### **You are not allowed to:**

- Abuse a child in any way including physical hitting or punishment, Emotional abuse and name-calling,
- Neglect the child in meeting their daily care needs.
- Sexually abuse the child or sexually exploit the child for financial profit.
- Engage in any kind of sexual activity with a child under the age of 18, irrespective of national laws. GCR considers the age of consent to be that of 18 years of age. Even consensual sexual activity with a child over the legal age of consent in Greece (15 years of age) is not allowed. Sexual activity of any kind with a person under the age of 18 is a serious legal issue and will result in severe disciplinary action including termination and pursuit of any available legal remedy under Greek law(s).
- Stay alone overnight with one or more children benefiting from GCR programs who are not part of their immediate or extended family, whether in their house, project premises or elsewhere.
- Travel alone with a child in a vehicle unless you are the child's legal guardian.
- Have a home visit with a child without permission from their parent or the child's guardian.
- Socialize with a child without prior permission from the child's guardian.
- Witness the child drinking alcohol, engage in drug-taking or risk-taking action that may cause harm to themselves or others etc. without taking action to report to authorities or intervene, except in cases in which your own personal safety could be jeopardized.

- Witness a child undertaking an illegal action without advising the child that their actions are against the law and that if they continue to do so, you are bound to call police authorities.
- Discriminate against, show differential treatment towards, or favor particular children to the exclusion of others.

**You are expected to:**

- Report any reasonable suspicion of child abuse or any misconduct in accordance with these Policies and Procedures. Failure to report a reasonable suspicion will be treated as a serious issue and may result in disciplinary action.
- Comply with Greek and international child protection legislation, prioritizing the law with the greatest protection afforded to the child.
- Manage sensitive information in a manner that is respectful, professional and that complies with the applicable law. Staff must keep all information about any suspected or reported incidents strictly confidential. They must divulge that information to the Child Safeguarding Focal Point and Director, except as required by law.
- Where possible and practical, apply the ‘two-adult’ rule, wherein two or more adults supervise all activities where children are involved and are present at all times.
- Know the steps to take and whom to contact when concerns arise regarding the safeguarding of children.
- Fully cooperate with any investigation or inquiry by the Child Safeguarding Focal Point.

**4.13. Responsibilities of the Child Safeguarding focal point:**

- GCR takes every allegation of a violation of our Child Safeguarding Policy seriously. The Child Safeguarding Focal Point is responsible to ensure all credible allegations are responded to appropriately.
- Initial Assessment: Upon receipt of a report, an initial assessment will be conducted by the Focal Point. A full account of the matter and any further action will be recorded. He/she will consider the circumstances of the report,

conduct the necessary investigation and determine next steps.

- The Child Safeguarding Focal Point must preserve all records and strictly adhere to the principles of confidentiality.
- Reporting to Applicable Authorities: Referrals must be made to the relevant authorities as soon as possible, and certainly, within one working day.

Serious incidents where the allegations relate to a staff member or volunteer and is likely to result in serious reputational damage for the organization, or other exceptional cases, the Child Safeguarding Focal Point shall consult with the GCR Board, as appropriate, on how the investigation should proceed, including to determine whether an external party should be retained to investigate allegations.

#### **4.14. Safeguarding checks:**

1. Each staff, volunteer and representative of GCR including high profile visitors who seek to be in the company of children (e.g. journalists, donors, celebrities) must meet the following child safeguarding checks:
  - a. Have a criminal record and background check before joining the organization. Retrospective checks will be conducted on all current members of the organization.
  - b. Receive a copy of GCR child protection policy and sign it in agreement prior to being in the company of children.
  - c. Staff and volunteers will receive Child Safeguarding Training within 6 months of being with the organization and all GCR representatives must take a refresher training every two years.
2. GCR Director, Coordinators and deputy Coordinators at all levels are responsible to ensuring that 1 a, b and c are completed by the staff reporting to them.
3. Even suspicions about a child abuse incident must be reported to GCR's Child Safeguarding Focal Point.
4. You must prior permission from a child's legal guardian before travelling alone with a child in a vehicle(s).
5. An incident report (attached as Annex 1) needs to be filled in by anyone who notices and/or suspects an occurrence of child abuse or any breach to the policies and procedures outlined in this document.

This document needs to be sent to GCR's Child Safeguarding Focal Point.

6. All agreements with Partners must include these Policies and Procedures as an addendum and must include a provision in which the Partner agrees to comply with these Policies and Procedures.
7. Communication Materials (including interviews, photography, filming etc) should not disclose any personal information about a child i.e child's full name, address and location
8. Communication materials must be sensitive to the rights of the children and must be guided by upholding their best interests. Communication materials about children should consider the risks to the children when recording data (i.e. humiliation, reprisal, legal prosecution etc.) and ensure that you do not place them in harms way through your actions.
9. Additionally, obtain informed, non-coerced consent from the child and the guardian for interviews and videos, and where possible, photographs.
10. All representatives of GCR on project visits involving children are subject to the policies and procedures outlined in this document.
11. Exceptions to any part of this policy and procedures require written approval from the Child Safeguarding Focal Point or Executive Director.

NB: All GCR representatives are expected to conduct themselves in a manner consistent with this commitment and obligation. Any violations of these policies and procedures will be treated as a serious issue and will result in disciplinary action being taken, including contract termination and any other available legal remedy. Furthermore, any individual who is aware of a violation of these policies and procedures and does not report them will also incur disciplinary action discussed above.

#### Associated policies

- Whistleblowing policy
- Anti-Bullying and Harassment

- Anti-bribery and corruption policy
- Reporting incidents/complaints
- Dealing with reports/complaints
- Code of Conduct for staff

GCR will ensure that employees, volunteers and anyone involved in the execution of the projects/programs that the GCR implements are aware of these policies and adhere to the procedures set out in relation to them.

**Date.....**

**Location.....**

**Signature.....**

**Name.....**

## ANNEX I

### I. INSTRUCTIONS FOR HANDLING A COMPLAINT FROM A VULNERABLE PERSON

When a vulnerable person (child, young person or vulnerable adult) tells you that they are uncomfortable or concerned about the behavior of a particular person (adult or child) towards them or towards another vulnerable person, the following steps should be taken:

- Reassure them that they were right to report the behavior.
- Listen carefully and calmly and ask questions to clarify the allegation so you can later report the incident correctly.
- During the conversation, try not to repeat the same questions, as this gives the vulnerable person the impression that they did not give correct information the first time and that they are not fully believable.
- Inform and explain to the person that you should report the incident of misconduct as it is in their best interest.
- Take appropriate measures to ensure the physical safety and psychological well-being of the vulnerable person. This may include referring him to medical care or a psychologist.
- Make sure you distinguish between what the vulnerable person has actually said and the conclusions you may have reached. Accuracy is of the utmost importance at this stage of the process.
- Do not allow personal doubts to prevent you from reporting the complaint to the reporting person.
- **Tell the vulnerable person what you are going to do next and that you will keep them informed of developments.**

### II. INDICATIONS OF POSSIBLE ABUSE

#### A. In children and young people

The following signs could be signs that abuse has taken place, but should be viewed in the context of the child's entire life.

### **Physical signs**

- Injuries that are inconsistent with the explanation given for them
- Injuries that occur in places where falls, rough play, etc. are not usually present.
- Injuries that have not received medical treatment
- Reluctance to change for or participate in games or swimming
- Recurrent urinary tract infections or unexplained abdominal pains
- Baby bruises, bites, burns, fractures, etc. that have no accident explanation\*
- Cuts/scratches/substance abuse\*

### **Indications of inappropriate (for age) sexual behavior**

- Any allegation made in relation to sexual abuse.
- Excessive preoccupation with sexual topics and detailed knowledge of adult sexual behavior
- Age-inappropriate sexual activity through words, play or drawing
- A child who is sexually provocative or seductive to adults
- Inappropriate bed sharing at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or latent sexual connotations
- Eating disorders - anorexia, bulimia\*

### **Emotional cues**

- Changes or regressions in mood or behavior, especially when the child becomes withdrawn or clingy.
- Depression, aggression, excessive anxiety.
- Nervousness, frozen alertness
- Obsessions or phobias
- Sudden decrease in performance or lack of concentration
- Inappropriate relationships with peers and/or adults
- Attention-seeking behavior
- Persistent feeling of tiredness
- Running away/stealing/lying

### **Evidence of Negligence**

- Malnutrition, failure to thrive, constant hunger, theft or overeating, untreated illnesses, inadequate care, etc.

\*These are indications of the possibility of self-harm by the individual

## **B. Signs of possible abuse in adults**

### **Physical abuse**

- History of unexplained falls, fractures, scrapes, burns, minor injuries.
- Signs of over or under medication use and/or untreated medical problems.
- Any injuries that are inconsistent with the explanation given for them
- Bruises and discoloration - especially if there are many bruises from different points of time and in places not normally exposed to falls, rough play etc.
- Repetitive injuries with no logical explanation
- Hair loss, weight loss and change in appetite
- Person recoils from physical contact and/or remains fully covered, even in hot weather
- A person who appears frightened or depressed in the presence of a certain person or persons

### **Domestic violence**

- Unexplained injuries or 'excuses' for marks or scars
- Controlling and/or threatening relationship involving psychological, physical, sexual, financial, emotional abuse. Honor crimes and female genital mutilation.
- The age range is extended to 16 years.

### **Sexual abuse**

- Pregnancy in a woman who lacks mental capacity or is unable to consent to sexual intercourse
- Unexplained change in behavior or sexually provocative behavior
- Torn, soiled or bloody underwear and/or unusual difficulty walking or sitting

- Infections or sexually transmitted diseases
- Full or partial disclosure or implication of sexual abuse
- Self-injury
- Emotional distress
- Mood changes
- Sleep Disorders

### **Psychological abuse**

- Alteration of the psychological state, e.g. withdrawal, agitation, nervousness, crying
- Fear or lethargy in the presence of a caregiver
- Is afraid, withdrawn or afraid to make choices or express wishes
- Unexplained paranoia
- Changes in mood, attitude and behaviour, excessive fear or anxiety
- Changes in sleep or persistent feeling of tiredness
- Loss of appetite
- Hopelessness or passivity
- Confusion or disorientation
- Incredible stories and attention-grabbing behavior
- Low self-esteem
- Financial or material abuse
- Difference between assets and living conditions
- Unexplained withdrawals from accounts or disappearance of financial documents or loss of money
- Sudden inability to pay bills, creating debts
- Carers or professionals who cannot explain expenses incurred on the person's behalf
- Recent changes in property titles
- Loss of personal belongings
- Improper granting and/or use of Power of Attorney

### **Modern slavery**

- External appearance: unkempt, inappropriate clothing, malnutrition

- Controlled travel, rarely alone, early or late night travel to accommodate work hours.
- Minimal personal belongings or identification documents
- Fear of asking for help or trusting

### **Discriminatory abuse**

- Inappropriate remarks, comments or disrespect
- Poor quality or avoidance of care
- Low self-esteem
- Isolation
- Anger
- The person devalues themselves because of their gender or sexuality
- Abuse can be seen in conversations or in the person's reporting about how they see themselves.

### **Systemic abuse**

- The person devalues themselves because of their gender or sexuality
- Abuse can be seen in conversations or in the person's reporting about how they see themselves.
- Lack of confidence in complaints procedures for staff or service users.
- Negligent or bad professional practice
- Negligence and acts of omission
- Deteriorating condition despite apparent care
- Poor housing, clothing or care and support conditions.
- Lack of medication or medical intervention

### **Self-neglect**

- Accumulation of things inside or outside a property
- Neglect of personal hygiene or medical needs
- Person who looks unkempt or dirty and has poor personal hygiene
- Person who is malnourished, has sudden or continuous weight loss and is dehydrated - constant hunger, stealing or overeating

- A person who is inappropriately dressed for the weather
- Dirt, odors from urine or feces in the person's environment
- The home environment does not meet basic needs (for example there is no heating or lighting)
- Depression

III. Report form (SAFEGYARDING POLICY, CHILD SAFEGUARDING POLICY)

If you have knowledge that a vulnerable person's safety might be in danger, please complete this form to the best of your knowledge. Please note that concerns regarding a vulnerable person must be reported directly to your line manager or Coordinator of Social Unit immediately (preferably within the same working day). You may wish to complete this form before contacting this person or you may wish to complete the report after contacting this person. This report is to be used as a tool to develop the most unbiased information-based report possible. For confidentiality reasons, the report should be written and signed solely by you. It should be sent only to the designated contact person. It will be held in a safe and secure place and treated with the strictest confidence.

1. About You

Your name:

Your job title:

Workplace:

Your relationship to the vulnerable person:

Contact details:

2. About the Vulnerable Person

Name:

Gender:

Age:

Address:

Guardians/Responsible partner org:

3. About your Concern

Was the abuse observed or suspected?

Is this concern based on first-hand information or information divulged to you by someone else? (If so who?)

Did the vulnerable person disclose abuse to you?

Date of the alleged incident:

Time of the alleged incident:

Location of the alleged incident:

Name of alleged perpetrator:

Job title:

Nature of the allegation:

Your personal observations (visible injuries, emotional state, etc.) [N.B. Make a clear distinction between what is fact and what is opinion or hearsay]

Exactly what the person or other source said to you [if relevant] and how you responded to him or her: [Do not lead the victim. Record actual details]

Any other information not previously covered:

Were there any other children/people involved in the alleged incident?

**CONSENT ON PRESERVING AND PROCESSING PERSONAL DATA**

I hereby consent that the Greek Council for Refugees (GCR) preserves and processes my personal data, aiming to extend the petition/complaint that you filed, in accordance to the defined in article 6 paragraph 1,7 and 9 Regulation 679/2016 of the European Union. Throughout this time period, during which GCR processes my personal data, I maintain the rights to be informed, access, correct, process, erase and transfer my personal data (Articles 13-20 of the Regulation).

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