



Subject:	Child safeguarding policy SYMBIOSIS Greece
Time/Date:	15/03/2020

1. Purpose of this policy

The purpose of the SYMBIOSIS's Child Safeguarding Policy is (1) to ensure that SYMBIOSIS projects, workers, or others working with or on behalf of the SYMBIOSIS 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 SYMBIOSIS employees, together we can reach this goal.

2. Scope of this policy

The SYMBIOSIS's Child Safeguarding Policy pertains to:

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

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

3. Definitions

- Child – For purpose of this policy, a child is defined as anyone under the age of eighteen years, in accordance with Article 1 of the UN Convention on the Rights of the Child
- Child Beneficiary — For the purpose of this policy, “child beneficiary” refers to all children who are targeted recipients – direct or through their family – of SYMBIOSIS implemented or financially supported projects.
- Child Abuse and Exploitation – For purpose of this policy, “child abuse” and “child exploitation” shall mean any and all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.
- Harm – For purpose of this policy, “harm” refers to physical or psychological injury or damage to a child's health, survival, development or dignity.



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- Suppliers/ Sub-Contractors – For purpose of this policy, “suppliers/ sub-contractors” refer to individuals, companies, or organizations with whom the SYMBIOSIS 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 SYMBIOSIS when the SYMBIOSIS 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 SYMBIOSIS has a contractual agreement or memorandum of understanding (MoU) for the purposes of project implementation.
- SYMBIOSIS Employees – For the purpose of this policy, “SYMBIOSIS Employees” refers to employees, fellows and interns, incentive workers, volunteers, contracted workers, consultants, and independent contractors. Beneficiaries who support SYMBIOSIS’s activities in the field on a voluntary basis, or who are receiving cash-based support are not considered ‘SYMBIOSIS Employees’.
- Visitors – For the purpose of this policy, “visitors” refers to individuals hosted by the SYMBIOSIS, who are visiting SYMBIOSIS implemented or financially supported projects/activities and are not SYMBIOSIS employees, or others involved in project implementation. It includes journalists, photographers, employees from other SYMBIOSIS 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)¹, SYMBIOSIS recognizes the right of all children to be protected from all forms of abuse and exploitation. SYMBIOSIS further recognizes its responsibility to ensure that SYMBIOSIS projects, workers, and others working with or on behalf of the SYMBIOSIS do no harm to children. SYMBIOSIS is committed to ensuring that our organizational policies, protocol, procedures, and actions reflect our commitment to fulfilling this responsibility.

5. Zero Tolerance

SYMBIOSIS has a zero-tolerance policy regarding the abuse and exploitation of children. SYMBIOSIS 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 SYMBIOSIS 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

¹ 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>.



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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

SYMBIOSIS 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 SYMBIOSIS's commitments to children under the Child Safeguarding Policy and shall be informed of how to report suspected violations of these commitments.

SYMBIOSIS 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 for SYMBIOSIS the following steps will be taken, which will be repeated on an annual basis:

1. Throughout the year, the Focal Person will receive, register and follow up on concerns that would be a breach of SYMBIOSIS's Child Safeguarding Policy. For this the Focal Person will develop a reporting mechanism.
2. At the end of the year (November), the Child Focal Point will draft an annual child safeguarding report and present this to the SENIOR MANAGEMENT of SYMBIOSIS 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 SENIOR MANAGEMENT of SYMBIOSIS (February).

Specific measures to increase Child Safeguarding are mentioned below.

6.1. Recruitment

SYMBIOSIS is committed to ensuring that all SYMBIOSIS Employees are suitable to work with children and are trained and informed of their responsibility to uphold and abide by the SYMBIOSIS's Child Safeguarding Policy. To ensure this, Human Resources will commit to:

- Reference checks, criminal background checks or other available means are conducted prior to an employment offer being extended to those who will be in direct contact with children.
- For positions involving direct contact with children, internal and external candidates are required to provide a minimum of three (3) references (preferably former supervisors, non-family members who are knowledgeable of the candidate's work with children and have known the candidate for more than one year).
- Candidates for posts involving direct contact with children must be vetted through targeted questioning during a face-to-face interview.
- Employment listings, Terms of Reference, staff orientation materials, and employment contracts and agreements for new and returning workers shall include the responsibility to abide by the Child Safeguarding Policy.



6.2. Behavioural Protocol

SYMBIOSIS is committed to ensuring that SYMBIOSIS Employees, visitors, sub-grantees, suppliers/sub-contractors, and implementing partners 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.

SYMBIOSIS Employees are required to comply with the behavioural protocol outlined below. At a minimum, SYMBIOSIS Employees **should never**:

- Physically punish or discipline child beneficiaries.
- Do things for children of an intimate, personal nature that they can do for themselves.
- Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
- Engage in sexual activity with children regardless of the age of consent locally. In accordance with the SYMBIOSIS's Policy on Beneficiary Protection and Exploitation and Abuse, this strict prohibition does not apply where the employee is legally married to someone under the age of 18.
- Use language or behaviour around or towards children that is inappropriate, harassing, abusive, sexually provocative, or demeaning.
- Invite child beneficiaries into their home, unless the supervisor has agreed that it is necessary for the protection of the child.
- Sleep in the same bed or room as a child beneficiary. If it is necessary to sleep in the same room, ensure that another adult is present, and that supervisor's permission has been obtained.
- Discriminate against, show differential treatment to, or favour particular children to the exclusion of others.
- Hire children for domestic or other labour which violates national labour laws, is inappropriate given their age or developmental stage, interferes with their education or recreational activities, or places them at significant risk of injury.
- Develop relationships with children that could in any way be deemed inappropriate, exploitative or abusive.
- Use any computers, mobile phones, video cameras, or social media to harass children.
- Access child pornography through any medium.

At a minimum, all SYMBIOSIS Employees **should always**:

- Ensure wherever possible that when working with individual children, another adult is present.
- Ensure that if images are taken of children that they are relevant, dignified and are taken with informed written consent of the child and at least one (1) caregiver².
- Restrict use of images of child beneficiaries to professional, respectful, awareness raising, fundraising, publicity, and programmatic purposes.
- Respect principles of confidentiality and abide by data protection protocol³, and only share children's personal information on a need-to-know basis.
- Make all effort to minimize risk of harm to child beneficiaries.

² For more information, see the press and visibility guidelines.

³ For more information, see the GDPR policy and guidelines.



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- Immediately report suspicion or allegations of child abuse or exploitation or policy non-compliance, either to their supervisor or directly to the Child Safeguarding Focal Point.

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

6.3. Visitors

SYMBIOSIS shall further inform all visitors about the Child Safeguarding Policy. All visitors shall be provided with a document that specifies the SYMBIOSIS's child safeguarding behavioural protocol and the requirement to confirm in written that they adhere to it.

6.4. Contracts, agreements and MoUs

Contracts, agreements, and MoU's shall include the requirement that sub-grantees, suppliers/sub-contractors, and implementing partners do not engage in any form of abuse or exploitation of children. Sub-grantees and implementing partners who have direct contact with children through SYMBIOSIS implemented or financially supported projects must agree in writing to ensure that during their association with the SYMBIOSIS, they and their representatives comply with the behavioural protocol outlined in the SYMBIOSIS's Child Safeguarding Policy or their own code of conduct of a similar standard.

6.5. Training

SYMBIOSIS is committed to ensuring that SYMBIOSIS Employees have the knowledge they need to uphold and abide by the SYMBIOSIS's Child Safeguarding Policy. SYMBIOSIS shall include information on the SYMBIOSIS's Child Safeguarding Policy in SYMBIOSIS trainings and orientation materials.

SYMBIOSIS shall provide basic orientation and its requirements to new SYMBIOSIS Employees as part of orientation and to existing employees in SYMBIOSIS headquarters, affiliate offices, country programs, and resettlement offices on an annual basis.

SYMBIOSIS shall provide specialized training as needed for SYMBIOSIS Employees, including but not limited to:

- HR practitioners at SYMBIOSIS;
- supervisors and managers;
- technical specialists;
- or other persons designated by SYMBIOSIS affiliate offices, country programs, or resettlement offices to receive policy violation complaints;
- emergency response teams;
- and those engaged in communications, media and fundraising activities, and data collection and information management.

6.6. Communications



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SYMBIOSIS is committed to ensuring that depictions of children—in words and images—protect their identity and respect their dignity and rights. The following standards shall guide SYMBIOSIS communications about children:

- Depictions of children must respect children’s privacy and present children in a respectful, dignified manner.
- Children must be adequately clothed in images. Sexually suggestive poses are not permitted.
- Informed consent must be obtained from children and their caregivers before taking photographs of them, except under exceptional circumstances where this may not be possible. When possible and appropriate, this consent should be in writing and children and caregivers should be informed of how the images will be used.
- Use of images of child beneficiaries shall be restricted to professional, respectful, awareness raising, fundraising, publicity, and programmatic purposes.
- Caution must be taken to ensure that no image or recorded case history of a child places him/her at risk or renders him/her vulnerable to any form of abuse.

SYMBIOSIS will include these communications standards in SYMBIOSIS communications guidelines for SYMBIOSIS Employees, journalists, photographers, and visitors to SYMBIOSIS projects.

6.7. Safety, Security, and Dignity

SYMBIOSIS is committed to ensuring that no harm, whether intentional or unintentional, comes to children as a result of SYMBIOSIS projects or operations. To ensure that SYMBIOSIS Employees are prepared to address the safety and security needs of child beneficiaries in the event of an accident or other harmful event:

- Where SYMBIOSIS programs serve children, Safety and Security Management Plans and Emergency Action Plans must include child safeguarding measures.
- Where SYMBIOSIS programs serve children, a list of relevant health and protection services must be maintained for referral.

Where the SYMBIOSIS has direct responsibility for running activities for children, children must be adequately supervised at all times.

SYMBIOSIS Employees should, where possible, ensure that proposals demonstrate that the risks children may face as a result of a project have been identified and addressed, and will be monitored.

To ensure that no harm comes to children as result of collecting or storing their personal information, SYMBIOSIS Employees must comply with the data protection protocol below:

- Prior to collecting personal information from a child, SYMBIOSIS Employees must identify and take steps to address potential risks related to the collection and storage of children’s data.
- Prior to collecting personal information from a child, SYMBIOSIS Employees must explain to the child what information will be collected, and how it will be used and stored.
- Informed consent must be obtained from the child before collecting or sharing his or her information. If the child is not old enough to provide informed consent, where possible this should be sought from the child’s caregiver.



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SYMBIOSIS Employees must only collect information that is necessary and/or that the child wants to provide. Information collected about children must only be shared with others on a need-to-know basis and must only be shared when it is in the best interests of the child. Information collected about children must be stored in a way that complies with Standard 5 of the Minimum Standards for Child Protection in Humanitarian Settings⁴.

7. Compliance with Donor Requirements

SYMBIOSIS is committed to making all effort to ensure that the SYMBIOSIS 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 SYMBIOSIS's Child Safeguarding Policy, relevant SYMBIOSIS departments, units, and programs shall make all effort to comply with those measures.

Sub-grantees, suppliers/sub-contractors, and implementing partners who have direct contact with children through SYMBIOSIS 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 SYMBIOSIS 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 SYMBIOSIS 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 SYMBIOSIS 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.

8. Management Commitment

SYMBIOSIS is committed to putting in place a clearly defined management structure to ensure coordinated and consistent implementation and monitoring of this policy throughout the organization. This is the main responsibility of the Senior Management of SYMBIOSIS in Greece.

The Senior Management of SYMBIOSIS is responsible for ensuring implementation and monitoring of policies contained, including coordinated implementation and monitoring of the Child Safeguarding Policy throughout SYMBIOSIS headquarters and affiliate programs offices. The Senior Management of SYMBIOSIS is responsible for:

- Ensuring that SYMBIOSIS Employees receive information on the policy through training and orientation provided.
- Reviewing the policy annually and submitting recommendations for revisions to the SENIOR MANAGEMENT and Child Safeguarding Focal Point.

⁴ <https://spherestandards.org/resources/minimum-standards-for-child-protection-in-humanitarian-action-cpms/>



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- Providing supervision and support to the senior management on monitoring implementation of the policy or other persons designated by an SYMBIOSIS office to assist in implementation of the SYMBIOSIS Child Safeguarding Policy.
- Senior Management and the SYMBIOSIS Child Protection Focal Point in program office are responsible for:
 - Ensuring that SYMBIOSIS Employees are trained on the policies contained in the SYMBIOSIS’s Child Safeguarding Policy and are aware of their responsibilities in relation to these policies.
 - Ensuring that supervisors are able to receive, record, report and respond to allegations of exploitation or abuse, including of children, in accordance with the SYMBIOSIS Reporting Guidelines.
 - Reporting alleged, suspected, or confirmed violations of the SYMBIOSIS’s Child Safeguarding Policy at SYMBIOSIS HQ.
 - In general, department heads and supervisors are responsible for:
 - Ensuring that SYMBIOSIS Employees under their supervision comply with policies contained in SYMBIOSIS’s Child Safeguarding Policy.

9. Policy Revision

The SYMBIOSIS’s Child Safeguarding Policy will be reviewed and revised on a yearly basis.

10. CONTACT INFORMATION

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