

Amna

CHILD
SAFEGUARDING
POLICY

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This policy applies to: Amna Board, Employees, Consultants, Volunteers, Trainees, External Contractors, Associates, Partners

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SECTION 1

1. Purpose of the Policy

The purpose of the Amna's Child Safeguarding Policy is (1) to ensure that Amna projects, employees, or others working with or on behalf of the Amna do no harm to children and that children at risk are protected; (2) to ensure that safety risks and cases of misconduct in respect of children are identified, reported, and addressed in an appropriate and timely manner. The promotion of children's wellbeing and upholding children's and vulnerable adults' rights is at the foundation of our work. This policy should be read in conjunction with Amna's Child Safeguarding Policy and applies to all contexts where Amna operates, informed by national protection and safeguarding requirements.

2. What is Child Safeguarding?

Child Safeguarding is the responsibility that organisations undertake to ensure their staff, operations, and programmes do no harm to children, do not expose children to the risk of harm and abuse, and that any concerns the organisation has about children's safety within the communities in which they work, are acted upon in an appropriate manner according to the understood risk, and where necessary reported to the appropriate authorities. *This section and the one below adapted from Keeping Children Safe – www.keepingchildrensafe.org.uk*

3. Definitions

Child: A child is defined as anyone under the age of eighteen years, in accordance with Article 1 of the United Nations Convention on the Rights of the Child, 1989. The term also refers to all children who benefit or have contact with Amna implemented or financially supported projects.

Child Abuse and Exploitation: Refers to 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. See point 4 below for additional information.

Harm: Refers to physical or psychological injury or damage to a child's health, survival, development or dignity.

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

Amna staff: Refers to employees, volunteers, contracted workers, consultants, and independent contractors.

Visitors: Refers to individuals hosted by Amna, who are visiting Amna implemented or financially supported projects and are not Amna workers, or others involved in project implementation. It includes journalists, photographers, board members, and donors, among others.

4. What is Abuse?

Abuse can take many forms; it can be physical, psychological, sexual or emotional. It can take the form of neglect or negligence. Discrimination is a form of abuse. Abuse can be organisational (when an organisation fails to protect a child from harm or is neglectful) or financial. Abuse also includes domestic abuse, modern slavery, and self-neglect.

Abuse is a violation of an individual's human and civil rights by any other persons or person.

Examples of abuse are:

- Hitting, slapping, rough handling
- Deprivation of warmth, food, clothing health care etc.
- Shouting, swearing
- Neglect of medical or physical need
- Any kind of sexual activity involving a child
- Discrimination or harassment on the grounds of race, religion, language and ethnicity; or on the grounds of disability, gender and sexuality.

5. Principles underpinning our Child Safeguarding Policy

Our Child Safeguarding Policy is based upon a number of principles and beliefs, including:

- All actions regarding child safeguarding must be taken in the **best interests** of children. This includes an understanding that in all our programmes and activities we must ensure that we respect children's rights and do not cause harm. We work within the framework of international and national laws and policies regarding safeguarding.
- All children have equal rights to **protection** and to have their wellbeing and participation promoted. All reports of concern regarding the safety and protection of a child will be taken seriously. Where necessary, appropriate steps will be taken to protect the child and to take action against the alleged perpetrator. This may include referrals to law enforcement and child protection agencies. In relation to allegations against staff, volunteers and partners, action may also include the suspension or termination of engagement or any type of cooperation.
- **Everybody has a responsibility** for safeguarding. This policy is mandatory for all those who work for or on behalf of Amna, including staff, volunteers and partners. Although training, advice and support will be provided, everyone should actively uphold the policy so that they can carry out their responsibilities towards safeguarding children. No single organisation is able to safeguard children by working in isolation, and therefore we will work with other organisations, agencies (such as state departments and ministries with a mandate to protect children) and groups as necessary and appropriate.
- We work in an **accountable and transparent** way where child safeguarding is made a priority, recognising that situations of abuse and harm are able to flourish when staff, volunteers, partners, children, families and community members do not feel able to raise

their concerns. We will share our policy and procedures with others, and be open to feedback regarding its application and relevance.

- We maintain **confidentiality** and do not disclose personal details of those involved in child protection concerns, including the names of those raising concerns unless it is necessary to pass on information to ensure that a child is protected (for example where a child may need specialist services or where a criminal offence may have been committed).
- We raise awareness and influence others on the importance of the **prevention** of risks for children, using our policy and procedures as a way of both highlighting our commitment and also of explaining our values.
- There is no one specific way of safeguarding children and promoting their rights, we need to work in **partnership** with communities to ensure that children are protected. Solutions to protecting children need to reflect the culture and operating environment and the nature of activities being undertaken. However, culture can never be used as an excuse for abuse. While staff and partners may propose modifications of the procedures, this must be done within the framework of requirements set down within this policy. It is not acceptable for a reduced level of safeguarding to be offered.

6. Assessing risk and working with partners

Amna is committed to ensuring that no harm, whether intentional or unintentional, comes to children as a result of Amna projects whether operated directly by Amna or through partner organisations. When working with partners:

- Amna representatives should, where possible, ensure that partners demonstrate that the risks children may face, as a result of a project, have been identified and addressed, and will be monitored.
- Amna representatives should ensure that partners have in place effective child protection policies and procedures. Moreover, there should be explicit agreement about which organisation's child protection procedures take precedence in the event of an incident. Our assumption is that in most cases the partner organisation's policies will take precedence but that Amna has the responsibility to track how incidents are resolved even if being dealt with by a partner.
- Amna representatives must take time to become familiar with the partner organisation's child safeguarding policies and procedures and know who the child safeguarding focal point is within the organisation, should an incident arise or should there be cause for concern.

7. Data Protection

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

- Prior to collecting personal information from a child, Amna representatives must identify and take steps to address potential risks related to the collection and storage of such children's data.
- Prior to collecting personal information from a child, Amna Representatives must explain to the child and/or their caregiver what information will be collected, and how it will be used and stored.

- Informed consent must be obtained from the child and/or caregiver 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.
- Amna representatives must only collect information that is necessary and/or that the child and/or caregiver to provide.
- Information collected about children and their caregivers 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 and caregiver.
- Information should be collected, stored, and shared in accordance with Amna's policies which require a signed form stored on Amna's database. Information collected about children and their families must be stored in a way that complies with applicable national laws, including data security and privacy laws.

8. Recruitment

Amna is committed to ensuring that Amna staff are suitable to work with children and are informed of their responsibility to uphold and abide by the Child Safeguarding Policy.

- 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 two 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.
- 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.

9. Media and Communications

Guidelines regarding the use of images by Amna must be observed, namely:

- Respect the Child Safeguarding Policy and its procedure.
- Make sure that the safety of the child will not be compromised if images of his or her home, community or environment are disseminated.
- Amna staff will accompany consultants and others while doing a report (video, photo, etc.).
- Obtain permission from the child and the person who is responsible for looking after him or her.
- Ensure that the child does not pose in any inappropriate manner or in any other manner that is detrimental to the wellbeing of the child.
- Do not take or publish photos of children who are naked or dressed inappropriately. Images of children which are exploitative or offensive must not be used.
- Always respect the children's dignity. Do not represent the children as victims (weak, desperate etc.). Images should present children in a positive way. Similarly, stories about

children should aim to report not only the negative aspects of children's lives, but also their strengths rather than sensationalising the child's experience.

- Taking pictures or videos is reserved for strictly professional use. Staff, volunteers and visitors are encouraged to 'like' and 'share' photographs published on official Amna websites and social media sites (such as Facebook). In this way, officially approved photographs may be distributed more broadly on personal social media sites. Unofficial photographs must not be posted or uploaded on personal pages.
- Only use photos available for public use (verified and validated by a senior manager and/or the person in charge of visual communication).
- Never indicate in the files any information that could endanger the child victim of abuse (title, metadata, captions etc.). When publishing/distributing photos, images, stories etc., personal information must be removed to ensure privacy (i.e. names and addresses must not be included and if necessary other identifying features such as school name should also be omitted).

10. Information, Communication & Technology (IT)

Amna has IT rules on the use of computers and other technology:

- IT equipment is provided for business purposes, and its use is subject to the Child Safeguarding and other relevant Policies.
- The use of computer and technology resources for private purposes is allowed provided that this does not prevent employees from exercising their professional activities, and that it is not prejudicial to the reputation and image of Amna.
- While the privacy of staff is respected, this is not guaranteed. Additionally, the CEO may exceptionally grant access to private files. This may be, for example, if there was a suspicion that IT equipment had been used to access child pornography online, in violation of the Code of Conduct.
- Any voluntary non-professional access to websites detrimental to the reputation of Amna (and in violation of the Child Safeguarding Policy) is strictly forbidden and can justify a dismissal with immediate effect. Any unintended access to harmful data should be immediately reported to line managers to avoid any misunderstanding.

In Summary:

Responsibilities of Amna Employees, Consultants, Volunteers, Trainees, External Contractors, Associates, Partners:

- To be familiar with the Amna Child Safeguarding Policy and procedures and attend appropriate training.
- To take appropriate action regarding safeguarding of children.
- To keep information about safeguarding incidents, particular the identity of those concerned, confidential.
- To declare any existing or subsequent convictions. Failure to do so will be regarded as gross misconduct and may lead to dismissal.

Amna

SECTION 2

1. Child Safeguarding Reporting Procedures

This section outlines what to do if an incident occurs under the auspices of an Amna operated service OR if an incident or cause for concern emerges when Amna is working with partners.

As previously mentioned, Amna staff should be familiar with the child safeguarding reporting procedure of the partner organization with whom Amna is working. It should also have been previously agreed that should there be cause for concern or if an incident occurs, that safeguarding procedures of the partner organisation will be followed.

However, it is also important than any incidents that occur or any cause for concern that is raised when working with a partner organisation are reported to the Amna safeguarding focal point.

All witnessed, suspected or alleged safeguarding issues, either in an Amna operated service or in a partner organisation **must be immediately reported to the Amna Safeguarding focal point (Head of Operations) in writing**. Use the following format see **attached annex 1** - which shall include:

- Position and contact details of the referring person in Amna and relationship to the child/organisation
- Personal information of the person who made the allegation (name, position, gender, contact details)
- Personal information of the child (name, age, gender, address)
- Personal information of the child's parent/caregiver (name, address)
- Date, time & location of the alleged incident or cause for concern
- Short description of the alleged incident or cause for concern
- Time when the alleged incident came to Amna representative's knowledge
- Details of how the alleged incident came to light
- Any other relevant information

2. Amna responsibilities

Amna's responsibility in such situations is to ensure that the relevant procedures are followed and to track and follow up to make sure action has been taken in the case of partner organisations.

- Amna staff, representatives and partners should be alert to signs that may suggest a child is in need of help. Everyone who works with and engages with Amna has a responsibility to ensure that children are protected.
- The reporting procedure is made widely available to ensure that everyone has sufficient knowledge and understanding of the steps that need to be taken regarding the safety of children and other witnesses.
- Once a concern about mistreatment/abuse arises at Amna, or in a partner organisation, Amna will go through the process outlined below in annex 2 regarding the stages of reporting safeguarding issues and concerns.

In cases where:

- A child or adult may disclose abuse or give reason to suspect that another child are being abused or at risk of significant harm.
- A parent or other adult may raise a concern about either their own or another child.
- A member of staff or volunteer may be suspected of abusing/exploiting a child.
- Anyone acting for or employed by Amna has reason to believe that a child is suffering or likely to suffer harm.

a. Disclosure of Abuse by a Child

If a child or adult discloses significant harm, the Amna representative should listen carefully, giving the child or adult time and attention and providing interpretation when there is such a need. The child is never to blame in situations of abuse and should be reassured that they have done nothing wrong, either in relation to the abuse or in reporting it.

If a child or adult shares information with a Amna representative about being abused, mistreated or in danger, or has witnessed or has concerns that another child is at risk, but requests that such information is not passed on to others, the following steps should be taken:

- The child or adult should be informed that it may not be possible to protect his/her confidentiality and that the matter might be discussed internally at Amna or with the partner organisation.
- The staff member or volunteer or Safeguarding Focal Point should make all efforts to help the child or adult understand the need for seeking appropriate help.
- If it is felt that the child or adult is at risk of significant harm, it will be necessary to refer the matter to the Public Prosecutor for Minors and the relevant Social Services contact, thereby breaching the child's confidentiality or to the police. However, the child (and if appropriate their caregiver) should be informed as fully as possible of what action has been taken and why and consent should be sought whenever possible.

The aim is to facilitate the disclosure (but not to cross-examine) in order to determine whether there is real cause for concern.

The responsibility for undertaking any investigation lies with the competent authorities (Public Prosecutor for Minors, competent Police Departments, Social Services, Police). The child or adult must be informed, as soon as possible, about any action being taken on their behalf and what is likely to happen. If there is no immediate danger, it is advisable to give the child or adult time to fully understand what action is being pursued and the reasons for it before proceeding.

Then, the Amna Safeguarding focal point (currently the Head of Operations) must be informed immediately by the referring person.

b. Immediate attention and support

If needed, medical and psychosocial support shall be immediately sought to the child concerned.

c. Contact with concerned persons

If the concern refers to a child the family/parents/guardian/emergency contact of the child shall be contacted, as deemed appropriate by the Amna Child Safeguarding focal point in consultation with other members of SLT.

d. Assessment and decision making

The Amna referral person shall try to figure out what has happened and establish the facts in the most objective and immediate manner possible. After assessing the reported concern, he/she submits his/her conclusions and suggestions to Amna Child Safeguarding focal point, who will consult with senior management.

The Amna Child Safeguarding focal point in cooperation with the referral person shall make a decision on an action plan which may include but is not limited to, depending on the case, further protection actions, reference to the competent authorities, complaint resolution process, disciplinary process, etc. The “best interests of the child” must be considered throughout the process. An assessment of the specific kind of support and assistance that is needed by the children affected by the incident will be offered.

e. Reference to competent authorities

In case of serious maltreatment/harm/abuse concerns or allegations, the Amna Safeguarding focal point shall report it to the competent local authority and ask for advice. The advice given shall be followed unless there are concerns that the process will be detrimental to the child. Depending on the case, it may initiate judicial proceedings and/or other disciplinary process.

3. Disciplinary process

Where concerns exist about the conduct of Amna Staff, Volunteers, Interns, External Contractors, Associates and Partners in relation to Child Safeguarding and/or where there has been a breach of the Child Safeguarding Policy, this will be investigated under this policy by consideration of referral to statutory authorities for criminal investigation under the law of the country in which they work; and/or by Amna in accordance with disciplinary procedures. Breaches of this policy and failure to comply with the responsibilities mentioned herein may incur the following sanctions:

- For Amna Staff – disciplinary action leading to possible dismissal depending on the severity of the incident
- For Amna Associates, Volunteers, Interns, External Contractors, Partners – up to and including termination of all relations including contractual and partnership agreements with Amna and in serious breaches there will be a referral to the appropriate authority.

In case a legitimate concern about suspected child abuse is raised but proves to be unfounded on investigation, no action will be taken against the reporter. However, appropriate sanctions will be applied in cases of false and malicious accusations of child abuse.

4. Observing the right to information

Amna shall reserve the right to inform other institutions which may contact the organization for professional references of the termination of contract for serious violation of the principles of the present protection policy, always within the legislative framework applicable to personal data protection. Specifically, if such a case occurs during the implementation of an action/project/program/operation **a)** either in the context of a partnership between Amna and other partner(s) and/or either **b)** under the funds assigned by Amna partner(s), by other public or private funding authority/organization/donor, then the administrative council of Amna shall promptly and

duly inform and share an information-investigation report with its aforementioned partners and funders – in line with the respect of personal data protection and confidentiality principles.

5. Ensuring service users' awareness

Amna will inform our partners and users of our service of the present Policy, using appropriate means that are in line with the age, maturity, national, cultural and religious background specific of our users so as to ensure that the principles and procedures laid down in this policy are adequately understood.

6. Implementation, monitoring and review

The Board of Amna is ultimately accountable for this policy and responsible for its implementation. Monitoring of abidance by and respect for this policy is made through the mandatory tracking of Child Safeguarding Policy and Amna's Code of Conduct. Monitoring shall be cooperatively ensured by all members of Amna, with particular focus on the Safeguarding focal point. This policy will be reviewed by Amna Board in cooperation with the Safeguarding focal point. The need for reviewing will be regularly examined every two years and/or when there are changes in the relevant legislation and/or as a result of any other significant change in the field of child protection.

CHILD PROTECTION LINES:

Greek National SOS Hotline for Children: 1056

European Child Support Line: 116111

European Hotline for Missing Children: 116000

Needs info for vulnerable adults provide EAPSY helpline?

The content of this policy document has taken into account, was inspired of and has include principles concerning children rights and protection thereof as inspired by the relevant international framework, guidelines, policy principles and provisions that are proposed and/or adopted by other institutions engaged in child and youth protection.

SECTION 3

Annex 1

Amna Child Safeguarding Report Form (this form should be filled in whenever an incident occurs, in an Amna operated service or in a partner organisation)

The form should be submitted, by email, to Amna's Child Safeguarding Focal point at the earliest opportunity.

Name of referring individual at Amna:	
Contact details of referring individual at Amna:	
Referring individual's relationship with child/organisation	
Details of child of concern:	
Name:	
Age:	
Gender:	
Address/contact details:	
Details of parent/caregiver:	
Address/Contact details:	
Date of alleged incident:	
Time of alleged incident:	
Location of alleged incident:	
Description of alleged incident:	
Time when the alleged incident came to the knowledge of the Amna representative	
Any other relevant information	

Annex 2: Reporting flow chart

SAFEGUARDING FLOWCHART

