

Athens, February 2022

# Safeguarding Policy

## 1. Introduction

The purpose of this Safeguarding Policy is to protect people from any harm that may be caused due to their coming into contact with Lighthouse Relief (LHR). This includes harm arising from

- the conduct of staff and personnel associated with LHR; and
- the design and implementation of LHR's programmes and activities.

This policy informs staff and associated personnel of their responsibilities in relation to safeguarding with the aim to actively prevent all forms of harassment, abuse and exploitation. It reflects the need to mitigate and immediately respond to safeguarding concerns that may arise in the wider humanitarian community.

## 2. Scope and Policy Statement

The Safeguarding Policy applies to all staff including LHR Board Members, interns and volunteers, associated personnel which includes suppliers and contractors as well as visitors. It applies to staff activities and behaviours at work and outside work.

LHR believes that everyone with whom we come into contact, regardless of sex, age, gender identity, disability, sexual orientation, ethnic origin or religion has the right to be protected from all forms of harm, abuse, neglect and exploitation. LHR is committed to creating and maintaining a healthy and safe working environment. We have a zero-tolerance policy, and will not tolerate bullying, harassment, sexual or other type of exploitation or abuse in any form by staff or associated personnel. Our Disciplinary Procedures will be applied where any breach of this policy has occurred.

We require all staff to report concerns or allegations against any member of our staff and all people associated with our work. We also aim to be approachable for reports to be made directly by beneficiaries or any professional from another organisation.

This policy will address the following areas of safeguarding: child safeguarding and adult safeguarding. These key areas of safeguarding may have other specific LHR policies and procedures associated with them (see Section 5). The Safeguarding Policy complements the LHR Code of Conduct and together they specify what constitutes acceptable behaviour and what does not. Relevant child and adult safeguarding definitions can be found in the Appendix section at the end of this document.

### **3. Child Safeguarding**

#### **3.1 Principles**

- A child is defined as anyone under the age of 18, with respect to the UN Convention for the Rights of the Child.
- We commit to the principle of Do No Harm in our programme design, implementation, media and communications, and recruitment procedures.
- The welfare of the child is paramount.
- All children, regardless of age, disability, gender or gender reassignment, race, religion or belief, sexual orientation have the right to equal protection from all types of harm or abuse.
- We all have a responsibility to promote the welfare of all children, to keep them safe, and to behave in a way that protects them.
- In particular those who are made additionally vulnerable because of the impact of previous experiences, their level of dependency or other issues.
- The majority of the children directly or indirectly involved in LHR projects may have experienced trauma and/or might have a different cultural background than LHR personnel. Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency or other issues.

We will seek to keep children safe by:

- Valuing, listening to and respecting them.
- Ensuring that we provide a safe physical environment for children and youth.
- Have a conscious approach to the power balance between adults and children, and avoid actions that exploit this.
- Ensure that children in our activities are aware of their right to NOT participate or withdraw from the activity at any time.
- Respecting each child's background and any differences that may exist from that of other participants or team members.

#### **Human Resources**

- Personnel with direct or indirect contact with children and youth should be asked specific questions in relation to child safeguarding during the recruitment process. These questions will aim at better understanding the candidate's ability to identify and handle risks most commonly associated with working with children.
- All personnel will be requested to submit a criminal record certificate upon job offer. Any criminal offence that triggers concerns for children's safety constitutes a valid reason for the organisation to withdraw its job offer. Issuance of criminal record certificates take approximately 2-3 weeks. If, due to the urgency of the assignment, work has already commenced, the respective employee should not work unsupervised with children until the background check is completed. This

responsibility lies with the direct supervisor in accordance with the employee's reporting line. No employee should be working alone with children.

- Records of safer recruitment policies, such as criminal records, references etc. should be kept in HR files. Information of this kind should be stored and kept in accordance with applicable data protection laws and regulations.
- All new employees must be properly informed about their obligation to comply with LHR Code of Conduct as well as the present Safeguarding Policy before beginning their employment. All new employees and volunteers must sign the relevant documents. Any question or request for clarification by the employee that is not addressed in the present document should be directed to the HR department.
- All staff members and standing volunteers will be given the opportunity to be regularly updated or reminded of child safeguarding policies and procedures, either formally, through relevant trainings and capacity building activities, or informally through team meetings and discussions with supervisors.
- A copy of the Child Safeguarding policy should be made available and easily accessible to all staff members.

### **Media and Communications**

- All staff members, associates, standing volunteers and interns must ensure that the safety of children will not be in any way compromised by disseminating or publishing images, videos and/or content of them.
- Children's right to privacy should be respected at all times. No image, video or any other type of content should be disseminated or published unless the parent, legal guardian or the person responsible for the child provides explicit permission to do so.
- The objective and use of content must be explained to the guardian in advance, in a language that he/she can understand. Children have the right to refuse taking part, even if the responsible adult consents.
- All media content must respect children's dignity.

## **3.2 Prevention**

### **Representatives of LHR should never:**

- Physically assault or abuse children.
- Develop any sort of sexual relationship with children.
- Develop relationships with children which could in any way be considered exploitative or abusive.
- Develop a dependent relationship where the child feels they have to pay/give back.

- Act in ways that may be abusive or may place a child at risk of abuse, including acting in an inappropriate or sexually provocative manner.
- Use language, make suggestions directly or indirectly, or offer advice that is inappropriate, offensive or abusive.
- Take children to their accommodation or out of camp/project areas, into a confined area and/or in a situation where they will be alone with the child.
- Do things for children of a personal nature that they are able to do themselves or act in a way that takes away the responsible caretaker's possibility to care for the child and their needs.
- Have excessive physical contact with children. Children might not feel comfortable with overly friendly behaviours; some can consider them an aggression, especially if they are recovering from extreme emotional or physical abuse.
- Participate in or condone behaviour of or towards children that is illegal, unsafe or abusive.
- Act in ways that shame, humiliate, belittle or degrade a child, or otherwise commit any form of emotional abuse, including discriminating, exhibiting differential treatment or favouring particular children to the exclusion of other children.
- Offer gifts to individual children. If providing a gift is appropriate, it should be given to the group and in a format agreed upon with the Project/Field Coordinator.
- Encourage close attachments with individual children – our visit is temporary, and we cannot maintain contact beyond the visit. The child will be exposed to a sense of abandonment.
- Take photos or videos of children, unless permission from Project/Field Coordinator and/or Head of Communications beforehand is given, and written consent from the child's legal guardian.
- Expose children to videos, photos or websites that are inappropriate.

Any violations of the above can result in immediate dismissal and/or disciplinary action (where necessary) according to LHR's Code of Conduct and disciplinary procedures.

### **3.3 Disclosure**

Disclosure is the process when a child or young person starts to express their experience of abuse and/or neglect. This may take place directly or indirectly. Note that it is not our task to help the child disclose abuse. If you have concerns with regards to the safety of a child, talk to the Child Safeguarding Focal Point or consult with your line manager who will follow the right protocol for handling the situation.

Children and youth may disclose abuse in a variety of ways, including:

- directly – specific verbal statements about what's happened to them

- indirectly – verbal statements, without clear statement, which suggest something is wrong
- behaviourally – displaying behaviour that signals something is wrong (this may or may not be deliberate, and this might also be hard to separate from a natural reaction and response to a trauma the child has experienced while fleeing, the living conditions in camp etc.).
- non-verbally – writing letters, drawing pictures or trying to communicate in other ways.

Sometimes children and young people make partial disclosures of abuse. They may withhold some information due to:

- Fear that they will get in trouble with or upset their family.
- Wanting to deflect blame in case of family difficulties as a result of the disclosure.
- Feelings of shame and guilt.

### **3.4 Response**

- If you suspect a child is in danger and/or experiencing abuse based on physical signs, report to the Child Safeguarding Focal Point or your line manager directly as soon as possible so that it can be reported through the appropriate channels.
- Do not delay reporting the abuse to the Child Safeguarding Focal Point or consult with your line manager. The sooner the abuse is reported the better.
- Do not share sensitive information given with anyone other than the Child Safeguarding Focal Point, including with your teammates, since the identity of the child should be kept anonymous.
- Move the child to a safe space and listen carefully to the child. Avoid commenting on the matter or showing reactions like shock or disbelief, which could cause the child to retract or stop talking.
- Never promise to the child to keep the disclosure a secret, but rather follow the referral pathway procedures that are in line with confidentiality principles.
- Do not take any actions directed towards the child, the child's family or the person you believe is abusing the child.
- Do not talk to the alleged abuser. Confronting the alleged abuser about what the child has said could make the situation a lot worse for the child.

## **4. Adult Safeguarding**

### **4.1 Principles**

As outlined in Section 2 - Scope and Policy Statement, LHR is committed to apply the same protection principles and procedures to all participants and beneficiaries of our services. Principles and procedures listed in Section 3 - Child Safeguarding also apply for those who are legally considered to be adults, with two main distinctions, which relate

to referral pathways and the right of adults to self-determination. All other responsibilities of LHR representatives that are related to safeguarding are explained in LHR's Code of Conduct.

### **Referrals & Self-determination**

Referral pathways for adults are maintained by Project/Field Coordinators.

One important difference between children and adults is an adult's right to self-determination. Adults may choose not to act at all to protect themselves.

Only in extreme circumstances does the law let you intervene. This may be when the adult is at serious risk of harming themselves or others or is assessed to lack the capacity in that area to make a decision.

### **Confidentiality & Disclosure**

Due to the above mentioned right to self-determination, you are not allowed to share confidential information with anyone including coordinators unless you have explicit consent from the adult in question or you have serious concerns of this person presenting a harm to themselves or others.

Often these situations can be stressful and difficult to assess, and we encourage you to seek advice from your line manager if you need support. LHR is committed to ensuring confidentiality and protection of personal information according to national and EU legislation.

Disclosure of safeguarding concerns to the relevant authorities upon written consent of the individual is maintained by the Project/Field Coordinators. In case that a person refuses intervention or support for the safeguarding concern, their wish should be respected. The safeguarding principle of proportionality should underpin decisions about sharing information without consent, and decisions should be made on a case-by-case basis, by the LHR Project/Field Coordinator who will assess and seek advice from a Protection actor or with the relevant authority.

## **5. Associated Policies**

The following specific policies are related to and support this policy ensuring high standards of safeguarding:

- Code of Conduct - regarding the conduct of LHR staff and associated personnel, including harassment, discrimination and disciplinary procedures and guidelines;
- Privacy Policy - regarding how we process personal data;
- Whistleblowing Policy - regarding how to report a safeguarding incident concerning LHR staff and associated personnel.

## 6. Implementation and Review

Accountable for the implementation of the Safeguarding Policy is the Safeguarding Officer and for Child safeguarding issues is the Child Safeguarding Focal Point.

This policy will be reviewed annually.

## Appendix: Definitions

**Abuse** - A deliberate act of ill-treatment that can harm a person's safety, well-being, dignity and development. It often involves individuals who have a relationship of responsibility and care of the victim including project staff, parents, guardians, teachers, community workers, health-care providers, religious leaders, friends or other children.

**Abuse of trust** - A relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital that those in a position of trust clearly understand the power this gives them over those they care for and the responsibilities this carries. They must be given clear guidance to ensure they do not abuse their position or put themselves in a position where allegations of abuse, whether justified or unfounded, can be made. This is particularly important in the context of humanitarian aid when those in positions of power also control aid and resources.

**Adult at risk** - Any person aged 18 or over who is or may be in need of care and support, (e.g., health, personal or social care), is experiencing or is at risk of abuse or neglect and as a result of this is unable to protect themselves from either the risk or experience of neglect or abuse.

**Associated personnel** - Persons associated with LHR including contractors, suppliers and visitors.

**Bullying** – Persistent, repeated and targeted mistreatment of one or more persons by one or more perpetrators that may include threats; intimidation; public humiliation; persistent and unwelcome teasing; and/or abuse or use of power to undermine or humiliate.

**Child** - Any person under the age of 18.

**Child labour** - Work that deprives children from their childhood, their potential and dignity. It includes work that is mentally or physically dangerous and/or interferes with their schooling. Children over 15 years of age can work if the above are not

**Discriminatory abuse** - Includes forms of harassment, slurs or similar treatment, verbal abuse because of race, gender and gender identity, age, disability, sexual orientation, religion (protected characteristics under the Equality Act 2010).

**Domestic abuse** - Includes psychological, physical, sexual, financial, emotional abuse, so called 'honour' based, female genital mutilation and forced marriage. Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include: acts of assault, threats, humiliation and intimidation, harming, punishing, or frightening the person, isolating the person from sources of support, exploitation of resources or money, preventing the person from escaping abuse, regulating everyday behaviour.

**Emotional abuse** - Harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying, and not giving care and affection, resulting in adverse effects on the behaviour and emotional state/development of an individual or child.

**Exploitation** - The use of force or other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability; or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person.

**Female genital mutilation** - Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It is also known as female circumcision, cutting, or sunna. Religious, social, or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It is dangerous and a criminal offence.

**Financial or Material abuse** - Includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, the misuse or misappropriation of property, possessions, or benefits.

**Harassment** - Unwanted, unwelcomed and targeted behaviour (may be verbal or physical conduct) that demeans, threatens or offends and results in a hostile environment. Usually, but not always, based on protected characteristics (race, colour, religion, ancestry or national origin, sex, age, marital status, sexual orientation, physical or mental disability or handicap, medical condition, protected veteran status, or genetic information and any other status protected by law).

**Harm** - Psychological, emotional, physical and any other infringement of an individual's human rights.

**Internet abuse and Abusive images of vulnerable adults** - An abusive image of vulnerable adults is defined as any representation without informed consent, by



whatever means, of the vulnerable adult engaged in real or simulated explicit sexual activities or any representation of the sexual parts of the adult for sexual purposes. These images are then shared on social media without their consent. Technology has also meant that vulnerable adults are now subject to additional abuse and cyber-bullying through the internet and other forms of social media. Vulnerable adults may also be at risk of coming into contact with people who want to harm them through their use of the internet.

**Neglect** - Allowing for context and resources, the failure to meet basic physical and/or psychological needs either deliberately or through negligence of a child or individual under the responsibility of the perpetrator.

**Organisational abuse** - Includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes, and practises within an organisation.

**Physical abuse** - non-accidental use of physical force that inadvertently or deliberately causes a risk or actual injury or suffering. Physical force includes but is not limited to hitting, shaking, kicking, pinching, pushing/pulling, grabbing, burning, female genital mutilation, torture, and other physical acts.

**Safeguarding adults** - Protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances. There may be instances whereby the risk is so high that referrals for support need to be made without an adult's consent.

**Safeguarding children** - Protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

**Self-neglect** - Includes lack of self-care to an extent that it threatens personal health and safety, neglecting to care for one's personal hygiene, health or surroundings, inability to avoid self-harm, failure to seek help or access services to meet health and social care needs, inability or unwillingness to manage one's personal affairs.

**Sexual abuse** - The actual or threatened physical intrusion of a person(s) on another in sexual nature, whether by force or under unequal or coercive conditions. It includes rape, indecent exposure, sexual harassment inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, sexual assault, sexual acts to which the adult has not consented or was pressured into consenting.

**Sexual exploitation** - Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation by a person(s) of another person. This definition includes human trafficking and modern slavery.

**Staff** - LHR's employees including volunteers, interns and Board members.

**Unaccompanied Child (UAC)** - An unaccompanied child is a person who is under the age of eighteen, unless, under the law applicable to the child, majority is, attained earlier and who is "separated from both parents and is not being cared for by an adult who by law or custom has responsibility to do so.

**Survivor** - The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

**Trafficking** - The recruitment, transportation, or receipt of persons by means of deception, coercion, threat, or force for the purpose of exploitation such as for labour, prostitution, or sexual exploitation.

**Victim** - A person who has experienced or has been exposed to a safeguarding concern. 'Victim' is a term often used in legal and medical sectors.

**Young carer** - A person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment, pursuant to a contract or as voluntary work).

**Zero tolerance** - Implies all allegations are assessed, investigated as needed, and appropriate action is taken.