

## i. Policy Introduction

The need for action to protect beneficiaries of humanitarian assistance from sexual exploitation and abuse (PSEA) arose from reports confirming that humanitarian workers had been responsible for acts of sexual exploitation and abuse (SEA) against beneficiaries. For the Network for Children's Rights (NCR), beneficiaries are children under eighteen (18) years of age.

Sexual exploitation is defined as **an actual** or **attempted** abuse of someone's position of vulnerability, differential power or trust, to obtain sexual favours, including but not only, by offering money or other social, economic or political advantages, including trafficking and prostitution. Sexual abuse means the **actual** or **threatened** physical intrusion of a sexual nature, whether by **force**, or **under unequal** or **coercive conditions**. It includes sexual slavery, pornography, child abuse and sexual assault. PSEA policies and practices aim to end sexual exploitation and sexual abuse by workers in the humanitarian sector and ensure that allegations of SEA are responded to in a timely and appropriate manner.

The Network for Children's Rights, through proven work in advancing and protecting the rights of children, recognizes the importance of adopting PSEA policies in organizational operations, since children are particularly vulnerable to experience sexual abuse and exploitation. Given the Network of Children's Rights offers services to migrant, refugee and unaccompanied children, as well as children from lower socioeconomic backgrounds, an added level of protection against mistreatment is imperative and further affirms the association's committed to protecting children of all communities from sexual exploitation and abuse.

The purpose of the PSEA Framework, including the policy, procedures and resources, is to establish a clear framework and concrete procedures for preventing, reporting and resolving any incidents of SEA. This policy ensures that all of NCR's staff, associates, volunteers and partners are aware of their role and responsibilities in keeping children and all relevant stakeholders safe

from any form of sexual exploitation or abuse. The policy offers definitions and sets clear responsibilities regarding prohibited behaviour and how to report and respond to SEA allegations, and the associated PSEA procedures outline the reporting and investigation processes.

## ii. Safeguarding Framework

The Network for Children's Rights is committed to implementing a holistic safeguarding framework to ensure children beneficiaries are adequately protected from any mistreatment, as well as from sexual exploitation and abuse. NCR's PSEA Policy Framework will supplement existing regulatory documents of NCR, such as the Code of Conduct and the Child Safeguarding Policy. As such, the PSEA policy adds a layer of protection and ensures that all aspects of Child Protection are respected and implemented accordingly.

The objective of this policy is to provide practical guidance to NCR in responding to an allegation of SEA, including referral of the survivor to appropriate services, reporting SEA and investigating SEA allegations in a safe, accessible, confidential and efficient manner.

PSEA guidelines are not intended to change or override internal policies or national legislation. Rather, they are procedures that arise from and supplement internal policies of the NCR.

Additionally, NCR's partners are required to incorporate PSEA procedures/reporting mechanisms into their own individual code of conduct and operational plans.

## iii. Definitions

- **Beneficiary:** A person who receives assistance as part of either emergency relief or development aid through assistance programmes. In the context of the Network for Children's Rights, beneficiaries are children and teens under 18 years of age.
- **Community-Based Complaints Mechanism (CBCM):** A CBCM is a system blending both formal and informal community structures, where individuals are able and encouraged to safely report any suggestions, complaints or incidents of SEA. For the Network, the CBCM includes a suggestion box in all premises of the association, as well as an online form.

- **Complainant:** A person who brings an allegation of SEA to the CBCM in accordance with established procedures. This person may be an SEA survivor or another person who is aware of or witnessing the wrongdoing. Both the survivor and the complainant, if different from the survivor, should be protected from retaliation for reporting SEA. Where there is any conflict of interest between the survivor and another interested party, the survivor's wishes must be the principal consideration in case handling, particularly when there is a risk of additional physical and/or emotional harm.
- **Emotional Abuse:** Emotional abuse occurs when behaviour is meant to criticize, embarrass, shame, blame, or manipulate another person. This behavior can have severe consequences on a person's self-worth and self-esteem.
- **Grooming:** Grooming occurs when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked.
- **Sexual Abuse:** The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions or any sexual contact and/or activity with a child.
- **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 of another.
- **Sexual Harassment:** Sexual Harassment occurs when sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature are made towards a person that does not welcome them.

#### iv. Responsibilities

The Board of Directors is responsible for ensuring the Network of Children's Rights is a safe place for all beneficiaries. The management, programmes and endeavours of NCR must be in line with the PSEA policy.

The Director is responsible for ensuring all daily operations of the Network for Children's Rights are smooth and promote the best interest of children. Additionally, the Director must be aware of the actions and programs and their alignment with the PSEA policy.

Coordinators are responsible for ensuring the actions they run are safe for every child attending. They are responsible for overseeing their employees and ensuring their appropriate conduct with beneficiaries.

The Director and Coordinators are Responsible for:

- Create and maintain an environment which prevents and responds to SEA;
- Nominate PSEA Focal Points in all of NCR's premises where children are regularly present;
- Empower and support the PSEA Focal Points in order for them to carry out their responsibilities;
- Ensure that every member of staff and affiliate workforce is trained on PSEA;
- Ensure that grant agreements, contracts and MoUs with donors, implementing partners, contractors and sub-contractors include a clause(s) that addresses PSEA;
- Participate (or nominate representatives on behalf of the organization- preferably the PSEA Focal Point) in a PSEA Task Force in order to centrally follow up and monitor the implementation of the SOPs in the field level as well as to promote and mainstream PSEA principles and policies in all areas and interventions in Greece.

Any additional staff, associates, volunteers, partners and other stakeholders are responsible for adhering to the policy. Everyone has the responsibility to treat beneficiaries with respect and carry out their duties with this policy in mind. Finally, they are all required to read, sign and receive training on PSEA.

**PSEA Focal Points:**

- Support awareness raising activities on PSEA with beneficiaries;
- Support in the establishment of internal complaint's mechanism, including SEA reports;
- Ensure regular presence on NCR's premises;

- Coordinate with Child Safeguarding focal points, to ensure that SEA survivors have access to case management and are referred to appropriate response services: medical, psychosocial, legal assistance, and to safe shelter and physical safety;
- Keep track of numbers of incidents reported;
- Provide input to the internal planning, budgeting, implementation, and reporting of PSEA activities;
- Support Program Coordinators to coordinate with partners in relation to PSEA activities;
- Conduct training sessions in their area of responsibility;
- Brief all beneficiaries on their rights and obligations upon arrival; a special point on SEA should be ensured;
- Report any SEA incidents or allegations to the Director and Board of Directors.

## v. Core Policy Principles

### i. Safeguarding

The Network of Children's Rights is committed to protecting and serving all children irrespective of culture, ethnicity, sex and religion. Children should be able to benefit from NCR's programmes and be protected from any type of sexual exploitation and abuse. NCR will foster a safe environment that is conducive to children's safeguarding.

### ii. Accountability

NCR's Board of Directors and Director bear the responsibility of implementing the policy and cultivating a culture of safety and respect. All staff, associates, volunteers, partners and other stakeholders will be held accountable for their actions if any instances of SEA are reported against them and may face criminal charges according to the law. NCR takes any such allegations seriously and will impose the necessary sanctions to those who fail to comply with the policy.

### iii. Accessibility

The NCR is committed to make accessible any mechanisms for the reporting of SEA incidents. It is important beneficiaries are able to access the appropriate mechanism and feel empowered to use them. Additionally, NCR serves all children, regardless of ability, hence providing access to

these mechanisms to beneficiaries facing any disability is of paramount priority. Verbal reports, as well as an online form is available for children to complete.

**iv. Effective Communication**

For the successful implementation of the PSEA policy all members of staff, associates, volunteers, partners and other stakeholders, must communicate effectively and in a simple and accessible language, as to spread information on PSEA procedures.

**v. Shared Responsibility**

All members of staff, associates, volunteers, partners and other stakeholders are responsible for adhering to and respecting the PSEA operating rules and standards. NCR will facilitate knowledge flow on PSEA procedures and ensure all parties are informed about the policies implemented.

**vi. Continuous Improvement**

NCR is committed to learning and improving from operations and the implementation of PSEA procedures. Through feedback services can become more effective in reporting instances of PSEA and aiding survivor recover in a timely manner.

**vii. Dignity and Respect**

NCR respects all beneficiaries, members of staff, associates, volunteers, partners and any other stakeholders. Through mutual respect and understanding, instances of SEA will be taken with the outmost sensitivity, free of any judgement.

**viii. Zero Tolerance**

NCR has a zero-tolerance policy regarding any instances of sexual exploitation and abuse. Any abuse of power by members of staff, associates, volunteers, partners and other stakeholders are condemned unequivocally.

**ix. Confidentiality**

NCR will handle any reports of SEA with complete confidentiality, guaranteeing the best interests of children are secured and promoted. Confidentiality will extend to all complainants or whistle-blowers.

## vi. Prohibited Actions

All members of staff, associates, volunteers, partners and other stakeholders are required to conduct themselves in accordance with the PSEA policy. Consequently, the following actions or attempts are strictly prohibited:

- Sexual, emotional or physical abuse (as defined above and in the safeguarding policy) is strictly prohibited.
- Sexual exploitation as defined previously is strictly prohibited.
- All members of staff, associates, volunteers, partners and other stakeholders are strictly prohibited from forming any type of intimate relationship with a beneficiary. Even in the case the beneficiary is eighteen years of age or older, relationships remain strictly prohibited. Additionally, the age of consent in Greece is set to fifteen years old, however, NCR strictly prohibits any relationship with a beneficiary because of the inherent power relations that develop in the context of their activities, i.e., the subordinate position of UAC deriving from their age, vulnerability, legal and family status make them unable to provide informed and reliable consent for sexual intercourse and as such any engagement with them in sexual relations falls under PSEA and is prohibited.
- Besides easily identifiable acts of sexual misconduct, NCR recognizes that a power imbalance exists between its employees and beneficiaries. As such, full and informed consent for any sexual activity is impossible to be given by NCR's beneficiaries, given their young age, legal status and other intersecting vulnerabilities.
- All members of staff, associates, volunteers and partners are strictly prohibited from grooming or coercing a beneficiary. This extends to both grooming or coercing from entering a sexual or any type of other intimate relationship.
- Any type of sexual harassment by staff, associates, volunteers, partners and other stakeholders is unequivocally prohibited. Sexual harassment can include unwelcome sexual advances or requests for sexual favours.
- Any form of physical violence, including verbal or physical instances are strictly prohibited.

- Further, other acts of unwanted behaviour, such as sexual comments looks and touches, are strictly prohibited by NCR. These acts may not be explicitly sexual, however any form of unwanted physical contact or behaviour from an employee is prohibited and condemned.

## vii. Policy Implementation

### 1. PSEA focal point

The PSEA Focal Point is a person from the Network for Children's Rights who will act as the point of reference for PSEA related issues. The Focal Point will be responsible for training, disseminating information/informing beneficiaries on SEA and reporting channels and collecting PSEA reports. The Focal point will be able to accept verbal reports of PSEA and hand a written report of the incident to NCR's Director. During formal hearings on PSEA incidents, the Focal Point must be always present, as a PSEA expert. The Focal Points are persons working with NCR's Child Protection Unit and have the capacity of Psychologists, Social Workers, Lawyers etc. These persons are trained and have a good understanding on child protection, as well as a demonstrated record in child protection. The Focal Points will continuously receive appropriate trainings, and report to relevant partners on the policy's implementation by NCR.

### 2. Staff

All members of staff and volunteers must follow the principles of the PSEA policy. Upon the hiring process, new members of staff will be required to read and sign an acknowledgment of the PSEA Policy. They will also be required to receive training on PSEA, given by the Focal Point. All members of staff are required to adhere to this policy and report any instances or suspicions of SEA to the PSEA focal point immediately.

### 3. New Staff

NCR takes concrete steps towards ensuring any new staff follows the appropriate procedures towards providing information regarding any criminal convictions regarding SEA incidents. According to relevant legislation, Criminal Background checks are mandated by Greek law, hence the Network will conduct all appropriate checks, before an employee is hired and comes to contact with beneficiaries. A reference check is sent out to previous employers for completion,



as well as a self-declaration form to the potential new hire, stating they have never been accused of SEA.

#### **4. Awareness Raising**

NCR is responsible for raising awareness regarding the PSEA Policy, both to members of staff, as well as beneficiaries, their parents or legal guardians. All parents or legal guardians must be informed about PSEA and the concrete steps NCR is taking to prevent, report and investigate any instances of SEA. Additionally, Coordinators of programmes or actions are responsible for providing adequate information about what PSEA is and the PSEA reporting mechanism. Some of the awareness raising activities to which NCR commits to are:

- Posters regarding PSEA provided by the United Nations High Commissioner for Refugees (UNHCR).
- Posters created by NCR (in English, Greek, Arabic, Farsi, Urdu, Bengali) regarding reporting incidents of PSEA.
- Introducing Focal Points to new beneficiaries.
- Information sessions with beneficiaries, by the Focal Points.

#### **5. Training**

All members of staff, associates, volunteers, partners and any other relevant stakeholders are required to complete the PSEA training, prior to working with children, during the first month of employment. The training will be conducted by the PSEA and Child Safeguarding Focal Points. Additionally, special training sessions will be given to parents and legal guardians of beneficiaries, given there are adequate number of participants.

#### **6. Reporting Mechanism**

The PSEA reporting mechanism is established as the Community Based Complaint Mechanism, namely the suggestion box and online form. Both options will be anonymous and as accessible as possible, by placing suggestion boxes in each facility of NCR. The beneficiaries will be shown the boxes upon their first visit to NCR's premises, as to be aware of its position within the space.

Additionally, SEA forms will be next to the boxes in all spoken languages, namely Greek, Arabic, Farsi, Urdu, Bengali. Child friendly forms will be provided to account for the young age of the beneficiaries. The PSEA Focal Point will be responsible for collecting these reports and given the nature of the complaint, the appropriate disciplinary actions will follow, according to NCR's Disciplinary Measures. The trained PSEA Focal Points will be the only persons with access to keys for the suggestion box.

NCR has also created a designated page on its website, offering the option for beneficiaries, guardians or other stakeholders to report instances of SEA. The materials provided for the suggestion boxes are also offered in the website. Finally, the Focal Points and Program Coordinators will make it known to the beneficiaries that they are available for them, if they need to report or share anything with them.

## **7. Confidentiality**

The Network for Children's Rights ensures the highest level of confidentiality when dealing with instances of SEA. It will take the following steps to ensure the identity of the survivor is protected: 1) The Reporting Mechanism will make anonymous reporting possible. 2) Once a report is filed and opened, only the necessary people will have access to the information at stake. 3) NCR will use code names for all involved through the investigation procedure, thus protecting the anonymity of the involved.

## **8. Whistle-Blowing**

All whistle-blowers will be treated with confidentiality, as to keep their identities protected and ensure there will not be any retaliation against them. All members of staff, volunteers and vendors will be able to make anonymous reports if they have encountered any instances of SEA by accessing the reporting mechanism.

## **9. Retaliation**

The Network for Children's rights is committed to ensuring there is no retaliation for anyone reporting an instance of SEA. The Network extends this commitment to anyone investigating a report of SEA, or assisting in making the complaint.

All members of members staff, associates, volunteers, partners and other stakeholders should feel safe and secure in reporting a case of SEA. Any retaliation against persons making a complaint can jeopardize the Network's credibility and endanger integral services to children. Retaliation inhibits the survivor support process and endangers their physical and emotional health.

Any complaint of retaliation will be taken seriously and the appropriate disciplinary measures will be taken against the retaliator.

To prevent possible retaliatory behaviour, NCR will take the following steps:

- Include a retaliation clause in the employment contract.
- Conduct relevant training once the employee is hired, by the PSEA Focal Points.
- Ensure full anonymity for any beneficiary or employee making a PSEA allegation, to prevent any retaliatory actions.
- Ensure that employees can anonymously report any retaliatory actions.

Examples of retaliation may include:

- Termination of the working relationship, demotion, disadvantageous assignments, lack of advancement opportunities, reprimands, or negative evaluations.
- Hostility between co-workers or retaliatory harassment, including intimidation, gossip, rumours, insults, or otherwise offensive conduct that would subject a person to ridicule or humiliation.
- Any action or set of actions likely to affect an employee's job performance.

#### Investigation and Disciplinary Measures

The responsibility of investigation falls under the Director of NCR, the Coordinator of the program the allegation stems from and the HR Manager. Upon receiving a formal or informal allegation from a beneficiary or other party, the Director is to be directly notified, as well as the HR Manager. NCR has established rules for serious allegations regarding the investigation procedure and disciplinary measures. These individuals must begin the investigation procedure and collect appropriate evidence, such as interview colleagues of the person the allegation is made towards. Upon collection of the evidence, an emergency Board of Directors meeting must take place, as

to discuss the evidence and decide on the appropriate disciplinary measures/ actions to be taken against the alleged perpetrator.

If the allegation concerns one of the three people tasked with carrying out the investigation, the person below them in rank will take up the role of investigator.

The following disciplinary measures will be taken by NCR in the case of a SEA allegation:

- Verbal Reprimand
- Written Reprimand
- Fine up to 1/5 of the salary
- Temporary suspension from work for up to 10 days for each calendar year, in case of a serious disciplinary misconduct.
- Permanent suspension from work.

## **10. Support to Survivors**

Supporting PSEA survivors begins immediately after the allegation, respecting and promoting the best interest of the child/ survivor. NCR will be responsible for ensuring the survivor's physical, psychological and emotional wellbeing are prioritised and respected. The PSEA Focal Points will liaise with the Child Protection Unit's psychologists, social workers and lawyers to draft a personalized protection support plan, according to the needs of the survivor. The survivor will receive initial support from NCR's team of professionals, who have extensive experience in child protection issues. However, in the event the survivor does not feel comfortable working with Network representatives, outside resources will be used to provide the needed support to the victim.

NCR may take additional action to find safe accommodation, refer the case to the police if necessary and refer to other legal and psychosocial services if deemed needed. In order to reach these services, NCR will make use of external partners and other NGOs specializing in child protection.