



Child Safeguarding Policy

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Acronyms

Child Safeguarding PolicyCSGP
UN.....United Nations
UNHCR.....UN Refugee Agency

Policy Overview

This policy helps us to achieve our mission, to do our part in the building of a world where no child, under any circumstances, is forced to endure trauma, stagnation and dehumanization. Through Better Days’ programmes, our team provides care and support for refugee children through focused and tailored interventions facilitating their empowerment, resilience and positive growth. Our CSGP is our fundamental guideline to ensure the safeguarding of children involved in any aspect of our work.

We, as personnel working with minors, have the responsibility and duty to keep them safe, to work for their benefit, and to promote their well-being. To reach this ambition, we must ensure that children at risk are visible and provided a safe space in which healing can begin. We should always enter into a **consensual collaboration** with the child and, through this, facilitate the necessary support structures where life skills can be developed and their rights, needs and well-being are approached and promoted in a holistic way.

This policy considers our responsibilities as adults working with children and emphasises a conscious approach to every practice. We, as adults, are the child’s point of reference and everything we do is an example of what should be done. The way we interact should encourage professional bonding as a means to help restore the child’s dignity and achieve growth. All adults working with children at risk are role models and must guide positively. Furthermore, every team member is paramount to the child’s protection and this must be our focus when we work together in a multidisciplinary way to create nurturing environments.

This policy explains how we can fulfil our mission to unaccompanied asylum-seeking children as Better Days in an appropriate way that safeguards and secures, provides basic need assistance and holistic support, using language that fosters comfort and confidence, without ever causing any harm.

1. What is Child Safeguarding?

Child Safeguarding is a concept different to Child Protection:

- **Child Safeguarding:** The duty of care and responsibility of organisations to adopt preventative systems, policies and practices to safeguard all children they come into direct and indirect contact with from harm and abuse. In short, Child Safeguarding is how we prevent harm.
- **Child Protection:** Practices which measure and structures to prevent and respond to abuse, exploitation, neglect and violence affecting children in all sectors, contexts and environments. In short, Child Protection is how we respond to harm.

1.1 Principles and Commitments

Below are the principles and practices which every member and associate of Better Days (i.e. staff, partners and volunteers) commits to follow when working with children and, by abiding by these, we guarantee the safest of conditions for all stakeholders.

This policy is governed by the basic principles of UNHCR's Safeguarding Fundamental Rights (2018-2019):

1. Empowerment and Gender Awareness
2. Integration and Inclusion
3. Resilience and Autonomy
4. Individualism and Identity
5. Multiculturalism and Diversity

And by these main elements guiding all Better Days' practices and services:

6. Utilitarianism
7. Professionalism and Self-Reflection
8. Holistic Approaches
9. Respect and Equality
10. Healthy Boundaries
11. Safe Space Design
12. Personalised Approaches
13. Personal Development & Progress

Better Days' work is built around a strong organisational commitment to:

- 1. Zero Tolerance of Child Abuse:** this refers to any form of abuse by anyone who works for, or is associated with, Better Days in any capacity.
- 2. Confidentiality, Safety and Best Interests of the Child:** all matters will be kept as confidential as possible, and information will only be shared on a need-to-know basis with a focus on the safety and best interests of the child.

3. Accountability: Better Days' systems document, monitor and report on the implementation of the CSGP and we have the mechanisms to ensure that management and team members understand and are committed to their CSG roles and responsibilities to their fullest capacity.

4. Shared Responsibility: All Better Days' partners and contractors' team members and associates must commit to and uphold the principles of the CSGP so it can be meaningful and successful.

Complemented by our dedication to these General Principles:

- All children have equal rights to protection from harm.
- Everybody has a responsibility to support the protection of children.
- Organisations have a duty of care to children with whom they work, are in contact with, or who are affected by their programmes.
- If organisations work with partners they have a responsibility to help partners meet the minimum requirements on protection.
- All actions on CSG are taken in the best interests of the child, which are paramount.

Finally, these are Better Days' Non-Negotiables:

- 1. Do not subject a child or adult to sexual, emotional or physical harm, exploitation or abuse**
- 2. Do not exchange goods, money, favours or services for sex**
- 3. Do not have sexual contact with a person receiving assistance**
- 4. Do consistently promote effective safeguarding in your work**
- 5. Do report any concerns you may have. If in doubt – report**

Note: Better Days expects that these principles and values are honored by all staff, partners and volunteers during work and off work hours, and holds the right to investigate and act against any claims and concerns of non-compliance; furthermore Better Days will investigate any reports or concerns of abuse.

1.2 Further Policy Coverage

To promote children's rights, we must distance the children from risk. To do so we must understand the risks, address them and take decisive actions to minimise exposure to active/potential risks. Thus, the basic procedures of this CSGP acknowledge these risks and the implementation of measures to address them. The more risks are identified, the more risks can be prevented. This CSGP provides content for Better Days to set guidelines and agreements providing structure, clarity, transparency, ethos, and overall good practices, including:

- The use of the [CSG Internal Audit checklist](#) by the Quality Manager or delegate to assess internal organisational gaps in child safeguarding and protection. The audit is conducted annually and is submitted for review during the Management Review.
- **Risk Assessment Guidance** (Appendix 1): how to adapt existing risk management tools to include CSGP risks

- **Safe Working Practices which includes [Burnout and Resiliency Tool](#)**: effective self-management tips to reduce secondary trauma by identifying good practices to prevent and recognize burn out. This section includes self-evaluation tools to assess Burnout and Resilience.

However, even with the most robust CSGP, abuse may still take place within the organisation. The organisation shall define the protocol and actions that must follow a breach of the CSGP, see **Complaints & Incidents Procedure** in the next chapter.

2. How can we ensure Child Safeguarding?

2.1 CSG Mechanisms

Complaints & Incidents Procedure:

- **Managing Allegations Against BD's Team Members**

An allegation reporting that a team member has behaved inappropriately or in an unsafe way will be taken seriously. Better Days will respond to such suspicions and allegations of child abuse in a manner that ensures safety of the child. Suspicions or allegations against staff/volunteers will be treated with the same commitment as those made against any other person.

In cases of child abuse, Better Days will not act alone; we will refer all suspected situations of child abuse to the **police and/or guardians**. When abuse is suspected, staff will follow the Complaints & Incident procedure . This outlines that, though the child's safety is the first concern, the accused must also have access to legal and professional advice.

BD's Complaints & Incident Procedure determines the steps that need to be taken when receiving an Incident report or a Complaint. These include:

1. A Rapid Assessment to determine protective actions that need to take place
2. An Investigation is conducted to gather further information Referral to relevant authorities
3. An Investigation Report is generated
4. The Safeguarding Committee concludes on the Action Plan

Note: during any investigation, the suspected team member will be prevented from any further unsupervised access to children and will be informed fully of their rights. The allegation may represent poor practice that needs to be considered under internal disciplinary procedures. The person conducting the investigation will be different to the person managing the employee's consequences. Members of the team are asked to collaborate in this process for the best interest of the minor and for ethical reasons.

- **How Can a Child Report an Incident?**

Children can report in three different ways, with all complaints considered equally. Upon receiving a complaint, an impartial officer will be contacted immediately for further action. (Also see Complaints & Incidents Procedure> [Accessibility reporting pathways](#))

<p>External Complaint & Incident Form</p> <p>Available at BD's website, translated in different languages</p>	<p>Oral or Electronic Complaint (off-site)</p> <p>BD's Safeguarding Committee can receive complaints through: compliance@betterdays.ngo and oral complaints in English or text messages at +30 694 725 4824</p>	<p>Oral Complaint (on-site)</p> <p>Any team member operating on the ground should be aware of BD's reporting mechanisms and be prepared to receive and report incidents (see below)</p>
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● **How a Team Member Reports Suspected Child Abuse**

Despite all preventive measures, child abuse can still happen, therefore, a solid system must be in place to respond. As such, all Better Days' staff and associates are obligated to report any witnessed, suspected or alleged cases of child abuse or exploitation by another staff member or associate of Better Days, as well as partners, contractors, or visitors to Better Days projects.

At all times during the reporting process and subsequent actions, Better Days is committed to:

1. Ensuring the safety, wellbeing, dignity and best interests of the child
2. Taking every report of child abuse seriously
3. Ensuring that all parties are treated fairly
4. Ensuring all procedures are transparent and in line with the law
5. Dealing with child abuse reports in a confidential and timely manner, always keeping in mind the protection of the survivor, the reporter and the alleged perpetrator.

All Better Days' staff and volunteers are required to submit an [Internal Complaint & Incident Form](#).

Everybody must take responsibility and care for what happens in the projects they work on. If child abuse, or other concerns or protection issues are suspected, witnessed, reported, or disclosed, the staff/volunteer receiving the concern must act immediately to secure the child's safety.

Listen, record and consult:

- **LISTEN** to the child and reassure them. Do NOT make promises or commitments you cannot keep. Do NOT formally interview the child. Obtain only necessary relevant facts if and when clarification is needed. Ask Who, When, Where, What but not Why. Always repeat/check your understanding of the situation.

- **RECORD** with the use of the Internal Complaint & Incident Form any physical or behavioural observations, perceptions, and anything said by the child (using the child's own words as far as possible). Include, date, time, who was present, etc.
- **REPORT** immediately with the Project Director or Coordinator in charge. Discuss and agree on an appropriate course of action, incl. whether a report of concern is to be made.

Report your concern:

All staff and volunteers can use the [Counseling Referral Form](#) to record observations and interpretations about a child's behaviour. The School Counselor will then monitor more closely the needs of the child.

If speaking to the child through an interpreter: ensure that the interpreter is aware of the importance of translating the exact words used by the child to disclose information.

If an incident, disclosure, or suspicion of child abuse takes place: the intervention and follow-up will be closely coordinated by the school counsellor and the safeguarding committee.

2.2 Development of Good Practices

- **Safe Recruitment**

We have strict recruitment processes to mitigate the chances of abuse and/or improper behaviour. Below are our basic processes:

- Staff and volunteers must be academically qualified to perform their duties and meet the position's requirements
- Applicants must submit a clean criminal record certificate
- Applicants must have a substantial amount of experience in their area of work
- Applicants' CVs will be assessed and discussed during the first interview
- Applicants must provide two references from recent employers
- There is a two-stage interview process
- All new staff will complete a 3-month probation period

More detail about our recruitment processes can be found in the [Employee Handbook, Volunteer Handbook, Staff Recruitment Procedure, and Volunteer Recruitment Procedure](#)

- **Compliance**

- By signing the Employee or Volunteer Handbooks, team members declare they have read, understood and will comply with BD's Policies, including CSGP, and BD's Code of Conduct.

- **Training**

Training ensures best practice and, for this reason, we provide mandatory training on entry and then, further, optional or team training to enhance individual staff and volunteer capacity where needed.

For further information see the [Employee and Volunteer Handbooks](#).

- **Creating a Safe Space**

Every space we work in is adapted to ensure the safety and comfort of, and bring out the best in, the children we work to protect. However, a safe space is not only a physical space, it is the trauma-informed atmosphere we create to support PSS purposes and facilitate the healing and engagement, learning and development of UASC.

Some steps to creating a child-safe environment:

1. Cultivating a comfortable, confidential and cosy environment.
2. Use of check-in and check-out techniques, whilst also providing time to transition.
3. Speaking softly, politely and calmly whilst always calling a child by their name.
4. Briefing the child on what they will be doing and when.
5. Practising active listening, showing understanding and empathy, praising when appropriate, and always acting stably and predictably.
6. Setting boundaries and sticking to them.
7. Acting as a positive role model for children to follow.

8. Building a sense of belonging for the child - make the space feel their own.

Additionally, BD ensures that its premises are complying with the national H&S standards and they are inspected in planned intervals.

- **Informed Consent**

Obtaining informed consent from individuals before providing services, interventions, or collecting personal information, ensuring that they understand their rights and choices. Informed consent is a key element of safeguarding mechanisms because it upholds principles of autonomy, empowerment, transparency, and respect. It helps create a protective environment by ensuring that individuals are active participants in decisions that may impact their well-being and that their rights are upheld throughout the process.

Documentation signed by the participants:

- **Communications Material Policy**

The Communication Materials Policy is intended to establish standards for the collection, use, and maintenance of communications materials in the context of Better Days projects and activities. It covers the collection of all communication materials, including but not limited to photos, videos, audio recordings, interviews, and testimonials. Participants, staff and volunteers of BD are required to fill in and sign the [Communications Material Release Form](#) in order to provide consent to collect, store, use, reproduce and share materials that include, or have been produced by, the person providing consent, in order to comply with high standards of protection for the privacy of any person associated with the organisation.

- [Data Consent Declaration](#)

This document is used to inform the program participants on their rights regarding their personal data and collects their consent to collect, store and process them. The declaration is in accordance with BD's [Privacy Statement](#).

- Depending on the project, and the services provided, program participants are required to sign additional documentation which provides detailed information on the provided services and require them to participate in decision making.

2.3 Staff & Volunteer Requirements

The following policies and documentation have been designed in accordance with the CSGP and have been included in the Employee and Volunteer Handbooks, which shall be signed by all staff/volunteers. Among others, the most relevant include:

- [Non discrimination Policy](#)
- [Confidentiality and Data Protection](#)
- [Employee Code of Conduct](#)
- [Child Safeguarding Policy](#)

2.4 Monitor and Review

Everything mentioned in this document will remain effective as long as its practices are regularly reviewed and monitored to ensure that they are still relevant to the projects and beneficiaries. The designated person to design the CSGP has the responsibility to coordinate with the Directors and supervise the staff and volunteers in order to ensure that all guidelines are being implemented as agreed. The review and redesign should occur at any time it is identified that a change is required. The review must consider the opinions and concerns of the team. Records of CSG incidents reported throughout the year will be evaluated annually as part of the monitoring and evaluation process and submitted for review during the Management Review.

More detailed information about the accountability issues and procedures are available in relevant protocols and annual reports. Moreover, internal audits with [Child Safeguarding Internal Audit Checklist](#) ensure compliance with the policy and safeguarding standards.

2.5 Relationships with External Agencies/Partners

Where we have the capacity and expertise to fulfil the needs of the child professionally and effectively, we commit to doing so; where there are more complex needs, Better Days has the responsibility to refer the child on to the appropriate service in accordance with their best interest. Whenever we refer a child on, Better Days takes the responsibility to ensure external agencies and other stakeholders that they assign the child to follow Child Protection Standards, have implemented a CSGP and have a Code of Conduct which ensures children's safety within the context in which they work. These documents should be accessible and regularly updated.

We believe that the welfare of the minor should be covered by organisations in the following ways:

- raising awareness of risk situations
- prevention of abuse or harm
- reporting abuse or harm
- responding to allegations of abuse of harm

There should be clear criteria amongst all organisations and agencies working with children for taking action and providing help to ensure that services are commissioned effectively, and that the right help is given to the child at the right time.

3. When do Child Safeguarding Standards apply?

Adherence to Child Safeguarding Standards is an obligation of all Better Days staff, volunteers and associates. Upon signing the Handbooks, we dedicate ourselves to keeping children safe both inside and outside the work environment.

4. Where & Who does the CSGP apply to?

Purpose of the Policy

The purpose of this Policy is to establish a set of internal preventative and responsive measures and procedures to:

1. Safeguard children: by minimising the risk of intentional or unintentional harm, abuse and exploitation of children within Better Days and its supported programs, and adequately responding in the event that harm and abuse occur.
2. Safeguard team members: by avoiding ambiguous workplace situations and behaviours, which may be misinterpreted and potentially lead to false allegations against Better Days staff and associates.
3. Safeguard Better Days: by showing its genuine commitment to safeguarding children and preventing cases of abuse from happening

4.1 Where?

Child Safeguarding applies in all contexts where Better Days staff/volunteers interact with a child or children. The CSGP does not only apply to individuals we support, but to all children in all circumstances. This means we commit ourselves to promote and ensure all children's safety at all times, both in our operational and programmatic contexts, but also at all other times and in all other places outside of the workplace environment.

4.2 Who to?

The CGSP applies to:

- **All staff and associates of Better Days**, full time or part time, temporary or long-term. This includes consultants, interns, volunteers, Board members and any other person associated, or working under contract, with Better Days in any capacity
- **All Better Days partners and contractors**, including downstream partners, suppliers or any other entity under contract with the organisation.
- **All visitors to Better Days' programmes** and activities or those which Better Days supports, conducted by partners. Such visitors include donors, supporters, ambassadors and any other person visiting supported programs for any purpose.

Note: feedback and complaints not related to Better Days's programs, commitments and conduct will not

usually be responded to. However, complaints received that are related to the safety and protection of participants will be immediately reported to relevant authorities.

5. Anything Else?

5.1 Definitions of Child Abuse

The following definitions attempt to clarify the meaning of all abusive practices experienced, in the present or in the past, by our target group.

- **Physical Abuse**

Physical abuse is a non-accidental act on a child that results in physical harm. This includes, but is not limited to, beating, hitting, shaking, burning, drowning, suffocating, biting, poisoning, or otherwise causing physical harm to a child. Physical abuse also involves the fabrication or inducing of illness.

- **Emotional/Psychological Abuse**

Emotional abuse is a persistent emotional ill treatment of a child such as to cause severe and continued adverse effect on the child's emotional development. This can include a pattern of rejecting, degrading, ignoring, isolating, corrupting, exploiting, or terrorising a child. It may also include age or developmentally inappropriate expectations being imposed on children. It also includes seeing or hearing the ill treatment of others. Any humiliating or degrading treatment such as name calling, constant criticism, belittling, persistent shaming, or solitary confinement is also considered emotional/psychological abuse.

- **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities (penetrative and non-penetrative, e.g., rape, kissing, touching, masturbation) as well as non-contact acts such as involving children in the looking at or production of sexual images, sexual activities, and sexual behaviours. Team members should be aware of their 'duty of care,' which precludes developing a sexual relationship with or grooming of a child. A sexual relationship between an adult and a child will always be wrong, unequal, and unacceptable.

- **Sexual Exploitation**

Sexual exploitation is 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. This includes exchange of assistance due to children benefiting from Better Days programming. The sexual exploitation of a child who is under the age of consent is child sexual abuse and a criminal offense.

- **Commercial exploitation**

Commercial exploitation is using a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, or moral or social-emotional development. It includes, but is not limited to, child labour.

- **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, causing serious long term harm to the child's health or development. It may also include neglect of a child's basic or emotional needs. Neglect is a lack of appropriate action, emotion, or basic needs.

- **Overprotection**

Overprotection can be exercised by parents, caregivers, or members of the staff of our organisation. It is considered undue or excessive protection or shielding, specifically, excessive restriction of a child's behaviour allegedly in the interest of his or her health and welfare by an anxious, insecure, or domineering parent/caregiver.

- **Institutional abuse**

Institutional abuse represents any form of abuse or neglect while a child is in the care of an institution. If the maltreatment is caused by employees of the institution, it is classified as institutional abuse. Institutional abuse is often difficult to identify because it is usually psychological and it implies an abuse of the default power of the staff/volunteers.

It is the responsibility of everyone working in a service to be aware of those practices and to denounce and report them as soon as possible to the immediate responsible of the project/centre.

6. Document Guidance

- CSG Internal Audit Checklist
- Burnout and Resilience Tool
- Complaints & Incidents Procedure> Accessibility reporting pathways
- [External Complaint & Incident Form](#)
- Internal Complaint & Incident Form
- Counseling Referral Form
- Employee Handbook, also see:
 - Non discrimination Policy
 - Confidentiality and Data Protection
- Employee Code of Conduct
- Volunteer Handbook
- Staff Recruitment Procedure
- Volunteer Recruitment Procedure
- Communications Material Release Form
- Data Consent Declaration
- BD's [Privacy Statement](#)
- CSG risk assessment exercise

Appendix 1 - CSG Risk Assessment

Better Days adopts a thorough CSG risk management strategy which includes conducting a [CSG risk assessment exercise](#) before commencing any program or conducting any new activity or event, which involve, target or affect children. Better Days' CSG risk management mechanism involve:

1. Identifying risks (i.e. detecting the potential for something to happen that will have an impact on children staff and associates, or Better Days as an organisation);
2. Assessing the risks (i.e. evaluating the likelihood and level of impact)
3. Mitigating the risk (i.e. developing strategies to minimise or address the risk, reducing the likelihood of harm and abuse from actually occurring, clearly assigning responsibilities in the mitigation strategy)
4. Regularly reviewing risks and mitigation strategies, especially when conditions/contexts change.

Main objective of this Policy is based on the right of every child to be safe from physical, sexual and emotional abuse and exploitation.

References

B. Berrett., D. Koehler et ., A. Siebert (2015) Practical Psychology Press,Chapter 2, *The Resiliency Advantage*. All rights reserved. See ResiliencyCenter.com.

<https://www.keepingchildrensafe.global/child-safeguarding-audit/>