

Safeguarding, Child Protection and Whistleblowing Policy

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Introduction

Safeguarding is the responsibility that an organisation has to ensure that their employees and volunteers, partners, operations and projects **do no harm** to children, young people or vulnerable adults (together referred to as 'vulnerable people' under this policy); that they do not expose them to the risk of discrimination, neglect, harm and abuse; and that any concerns the organisation has about the safety of vulnerable people within the communities in which they work, are dealt with and reported to the appropriate authorities. It is also the responsibility that the organisation has for protecting its employees and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse.

In other words, safeguarding is our attempt to ensure that everything which lies within our control is done to ensure the safety and welfare of all people we work with and alongside.

Child protection is a central part of but not separate to safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm as a result of abuse or programme of work. It also includes measures and structures designed to prevent and respond to abuse.

'Whistleblowing' refers to the reporting of suspected misconduct in the public interest, therefore is relatable to safeguarding and child protection, but the policy outlined below is equally applicable to other wrongdoings, such as fraud, illegal acts or abuse of resources.

Watershed recognises that in attempting to successfully prevent violence and abuse, we must deal with violence and abuse on all levels: social, structural, institutional and on an individual-personal level. We recognise that by, collectively and individually, rejecting the image of an 'evil wrongdoer' and by accepting that we all have the potential to make mistakes and misjudgements, cause harm or commit wrongdoings, purposefully or not, then we are able to make progress in preventative measures.

Definitions

Abuse - a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult. Abuse can be a single act or repeated acts and can be **unintentional or deliberate**. Abuse often involves criminal acts.

Child – For purpose of this policy, a child is defined as anyone under the age of eighteen years, in accordance with Article 1 of the UN Convention on the Rights of the Child.

Child Abuse and Exploitation – For purpose of this policy, "child abuse" and "child exploitation" shall mean any and all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

Discriminatory Abuse – Abuse motivated by a vulnerable person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

Harm – For purpose of this policy, "harm" refers to physical or psychological injury or damage to an individual's health, survival, development or dignity.

Neglect - the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include



failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs.

Suppliers/ Sub-Contractors – For purpose of this policy, “suppliers/ sub-contractors” refer to individuals, companies, or organizations with whom Watershed has a contractual relationship for the provision of goods or services.

Visitors – For the purpose of this policy, “visitors” refers to individuals hosted by Watershed, who are visiting Watershed projects and are not Watershed representatives. It includes journalists, photographers, partners, board members, and donors, among others.

Vulnerable Person/People – For the purpose of this policy, “vulnerable person” refers to anyone over the age of 18 who is or may be for any reason unable to protect themselves against significant harm or exploitation. By definition all residents of refugee camps are vulnerable people.

Watershed Representative – For the purpose of this policy, “Watershed representative” refers to employees, fellows and interns, incentive workers, volunteers, contracted workers, consultants, and independent contractors.

Whistleblowing – The disclosure by a person, usually a representative such as an employee, to the public or those in authority, of mismanagement, corruption, illegality or some other wrongdoing.

Scope

Who does safeguarding apply to?

- Watershed Greece (henceforth Watershed) members, friends of the association and all other representatives.
- Watershed staff, full time, part time or engaged on short-term contracts, e.g. consultants etc.
- Volunteers, interns, trustees and board members, staff and representatives of partner agencies and any other individuals, groups or organisations who have a formal relationship with Watershed.
- Donors, journalists, celebrities, ambassadors, politicians etc.
- All people who visit Watershed, must be made aware that our safeguarding principle applies to them while visiting our projects and offices.

Who is responsible for safeguarding?

Everybody. All aforementioned individuals are obliged to follow this policy and maintain an environment that prevents exploitation and abuse, which also encourages reporting of breaches of this policy, by using the appropriate procedures.

Policy Statement

Watershed has zero tolerance against harmful behaviour, abuse and exploitation of vulnerable people. We aim to ensure that anyone who represents our organisation behaves appropriately both in and outside of work and **never abuses the position of trust** that comes with being a part of the Watershed team. We also recognise that safeguarding is everyone's responsibility and that we have an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of vulnerable people with whom we work and those we work alongside.

Watershed works to the following key principles to protect vulnerable people:



- Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- The best interests of the vulnerable person are paramount and shall be the primary consideration in our decision making.
- Watershed will take responsibility to meet our obligations regarding our duty of care towards vulnerable people, and take action where we believe that a child, young person or vulnerable adult is at risk or is actually harmed.
- We will ensure that all Watershed representatives are inducted in our 'safeguarding standards'.
- When working with or through partners or sub-contracted agencies, Watershed will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy.
- Watershed recognises that an element of risk exists, and while we may never be able to totally remove this, we need to do all we can to reduce it or limit its impact.
- Watershed respects confidentiality and has a responsibility to protect sensitive personal data. Information should only be shared and handled on a need to know basis, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.
- Watershed commits to monitoring the implementation of the safeguarding policy. This policy will be reviewed every three years and earlier if necessary.

All people working with Watershed will:

- Read, understand and adhere to the Watershed Safeguarding Policy and Watershed Code of Conduct Policy.
- Strive to promote a zero-tolerance approach to discrimination, sexual harassment and abuse in all working environments.
- Strive to develop relationships with all stakeholders which are based on equality, trust, respect and honesty.
- Place the safety and welfare of children and vulnerable people above all other considerations.
- Report any concerns they may have about the welfare of a child or vulnerable person.
- Report any concerns they may have about the behaviour of a Watershed representative in relation to safeguarding.

All people working with Watershed will not:

- Sexually harass, assault or abuse another person.
- Physically harass, assault or abuse another person.
- Emotionally abuse another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade.
- Condone, or participate in behaviour which is abusive, discriminatory, illegal, or unsafe.
- Develop, encourage or fail to take action of relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive.
- Act in ways that may be violent, inappropriate or sexually provocative.
- Agree with a child to keep a secret which has implications for their safety or the safety of other young people.

Child Protection

Child Abuse consists of anything which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood. The main categories of abuse are defined by the World Health Organisation (WHO) as **physical abuse, emotional abuse, neglect and negligent treatment, sexual abuse, and exploitation.**



- **Physical abuse:** actual or potential physical harm perpetrated by another person, adult or child. It may involve hitting, shaking, poisoning, drowning and burning. Physical harm may also be caused when a parent or caregiver fabricates the symptoms of, or deliberately induces illness in a child.
- **Sexual abuse:** forcing or enticing a child to take part in sexual activities that he or she does not fully understand and has little choice in consenting to. This may include, but is not limited to, rape, oral sex, penetration, or non-penetrative acts such as masturbation, kissing, rubbing and touching. It may also include involving children in looking at, or producing sexual images, watching sexual activities and encouraging children to behave in sexually inappropriate ways.
- **Neglect and negligent treatment:** allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in serious impairment of a child's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children from harm and provide for nutrition, shelter and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill treatment of a disabled child.
- **Emotional abuse:** persistent emotional maltreatment that impacts on a child's emotional development. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment.
- **Child exploitation** includes child domestic work, **child soldiers**, the recruitment and involvement of children in armed conflict, **sexual exploitation** and pornography, the use of children for **criminal activities** including the sale and distribution of narcotics and the involvement of children in **harmful or hazardous work**.
- The **best interests** of any children come first. When dealing with a safeguarding concern, the best interest of the child will be our priority and we will strive to ensure their safety, health and well-being including meeting their emotional, psychological and physical needs.

All people working with Watershed must never:

- Hit or otherwise physically assault or physically abuse children.
- Engage in sexual activity or have a sexual relationship with anyone **under the age of 18 years** regardless of the age of majority/consent or custom locally. Mistaken belief in the age of a child is not a defence.
- Develop relationships with children which could in any way be deemed exploitative or abusive.
- Act in ways that may be abusive in any way or may place a child at risk of abuse.
- Use language, make suggestions or offer advice which is inappropriate, offensive or abusive
- Behave physically in a manner which is inappropriate or sexually provocative.
- Do things for children of a personal nature that they can do themselves.
- Condone, or participate in, behaviour of children which is illegal, unsafe or abusive.
- Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.
- Discriminate against, show unfair differential treatment or favour to particular children to the exclusion of others.
- Spend excessive time alone with children away from others in a manner which could be interpreted as inappropriate.
- Expose a child to inappropriate images, films and websites including pornography and extreme violence.
- Place themselves in a position where they are made vulnerable to allegations of misconduct.
- Give cigarettes or other age-restricted items to anyone who may be under the legal age.

This is not an exhaustive or exclusive list. Watershed representatives should, at all times, avoid actions or behaviour which may be misrepresented, constitute poor practice or potentially abuse. Breaches of this can lead to disciplinary action, termination of relations including contractual & partnership agreements. Where relevant, we will refer to the appropriate legal frameworks as per national law.



Safeguarding through Health & Safety

Health and Safety is a shared responsibility. All Watershed representatives must be **equally committed** to ensure their personal health, safety, organizational security and the safety of the people we support. Maintaining safe and healthy working conditions is important to all.

Roles and responsibilities regarding health & safety:

- Safety is everyone's job: Watershed representatives will actively participate in and contribute to the development and maintenance of health and safety measures, awareness of security risks and overall team wellbeing.
- All Watershed representatives are responsible for the impact their actions have on the health and safety of their fellow staff and of people we work with and alongside.
- All Watershed representatives are responsible for their personal health, safety and security and should exercise common sense to ensure their own safety.
- Watershed representatives have the right to decline to undertake a deployment, activity or travel without suffering disciplinary action if they feel there is a valid risk to their personal health and safety.
- All Watershed representatives are responsible for reporting any security incident or near miss security incident to their line manager as soon as this is possible.

All people working with Watershed must:

- Remain constantly vigilant about the health and safety of themselves and those we work with and alongside.
- Maintain a safe distance from others, especially children, while using power tools and heavy equipment.
- Dispose of hazardous materials in a way that ensures no one will come into accidental contact with them.
- Keep equipment and hazardous materials out of the reach of children.
- Follow safety advice given by senior representatives and seek advice whenever there is a potential risk.
- Observe and instruct less experienced representatives who carry out potentially dangerous activities, giving complete safety instructions and ensuring that these have been fully understood.

All people working with Watershed must never:

- Be under the influence of alcohol or drugs during work hours.
- Allow a child to play with any tools or items that may potentially cause them accidental harm.
- Allow a child to lift or carry objects that are heavy and may potentially cause them injury.
- Allow a child to come into contact with hazardous materials or waste.
- Leave the workshop unlocked and unattended.
- Leave tools unattended around the site, as they can cause injury, either intentionally or unintentionally.

This is not an exhaustive or exclusive list.

Safeguarding through Communications

Watershed is committed to ensuring that depictions of children and vulnerable people, in words and images, protect their identity and respect their dignity and rights.



The following standards shall guide Watershed's communications:

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

Watershed will include these communications standards in Watershed communications guidelines for Watershed representatives, journalists, photographers, and visitors to our projects.

Reporting Safeguarding Concerns

To report safeguarding concerns within the Watershed team, representatives should inform Patrik Veltins, Jonas Härter or Jonathan Turner, as soon as possible. If a Watershed representative is found to be in breach of this policy, they will receive an immediate dismissal and the relevant authorities will be advised.

If a Watershed representative becomes aware of a safeguarding concern outside of the Watershed team but within the environment in which the team are working, then it is Watershed's responsibility to inform a relevant humanitarian actor, for example, Médecins Sans Frontières.

A record, such as an incident report, must be kept of all safeguarding and child protection incidents made aware to Watershed.

Whistleblowing

Watershed expects all of its representatives to uphold the highest level of integrity while working for, volunteering at or visiting our projects. It also encourages all its representatives to report any wrongdoing they are concerned about at Watershed. It considers whistleblowing a positive act that is in the interest of Watershed.

The purpose of this section of the policy is to:

- Encourage people to say something if they see something
- Assure everyone that they will be protected if they report any wrongdoing in good faith
- Ask people to raise their concerns within Watershed in the first place, rather than taking the matter outside it.

What is whistleblowing?

'Whistleblowing' means the reporting of misconducts or wrongdoings in the public interest, such as mismanagement, corruption, fraud, illegal acts, abuse of power, people or resources; and safeguarding and child protection issues as previously outlined within this document. You 'blow the whistle' on someone if you disclose information about a wrongdoing that is in the public interest. This



means that it affects other people, for example the population with whom we are working, other Watershed representatives or members of the public.

Protection for a whistle blower

As a whistle blower, you are protected by European law (The Directive- (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law). Watershed, as well as upholding the European Directive surrounding whistleblowing, utilises this policy to elaborate on certain protections for whistle blowers. Watershed assures that:

- All representatives of Watershed, as defined within this policy, may blow the whistle on a wrongdoing
- As an employee, you shall not be treated unfairly or lose your job because you 'blew the whistle'
- As any other type of representative, for example a volunteer, visitor or contractor, you shall not be treated unfairly or unfavourably because you 'blew the whistle'
- If any Watershed representative blows the whistle, it is within Watershed's duty of care to ensure that they receive appropriate support should they need it, particularly if the whistle blower is also concerned as a victim.
- All reports of wrongdoing will be dealt with seriously and promptly
- The whistle blower shall be kept informed of the action/s being taken because of their report

These protections are granted on the basis that the report of wrongdoing relates to at least one of the following:

- A criminal offense
- A breach of legal obligation
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Deliberate concealment of information tending to show any of the above five matters

