



Safeguarding Policy

Europe Cares e.V.

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Name and contact details for reporting concerns	safeguard@europecares.org	

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1. Introduction

Europe Cares (EC) evolved from a pan-european campaign to show solidarity with people on the move in Moria camp from across the continent. It is an association with charitable status, registered in Frankfurt am Main, Germany. It started as a grassroots campaign in April 2020 in response to the onset of the Covid-19 Pandemic and was established as an association in May 2021.

EC works towards a European society that stands in solidarity with people on the move. The organization supports people on the move on the European borders and stands up for human rights. As well as delivering services, EC collaborates with like-minded organizations and promotes networking in the different areas of its work to increase the effectiveness of its support.

2. Purpose

The purpose of EC's safeguarding policy is to describe how the organizations will protect people from any harm that may be caused due to their contact with services delivered by EC. Whilst this is an inclusive commitment, EC is aware of the particular vulnerability of some categories of people on the move, including accompanied and unaccompanied children, adults with physical or mental disabilities or vulnerabilities, women, the elderly, persons with a disability, racial and ethnic minorities and the LGBTQI community. Notwithstanding these categories of vulnerability, EC also recognizes that adult males on the move may suffer discrimination and stigma associated with a racist narrative that view them as "dangerous male refugees".

EC will protect people on the move from harm arising from:

- The conduct of staff or personnel associated with EC, and
- The design and implementation of EC's programmes and activities.

This policy lays out the commitments made by EC and informs staff and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under EC's Anti Bullying and Harassment Policy.
- Safeguarding concerns in the wider community not perpetrated by EC's staff or associated personnel.

3. Our Values

- EC's primary commitment is to ensure the protection of and assistance to people on the move, who include asylum seekers, displaced persons, migrants, and refugees. EC is committed to supporting the fullest possible participation of these groups – as individuals, families, and communities – in decisions that affect their lives.
- EC will actively promote adherence to the principles of international refugee law, international human rights law, international humanitarian law and observe national legislation for the safety and protection.

- As an organization championing social justice, EC will ensure that whilst campaigning for change we are intersectional in our approach, and continually acknowledge how privilege reflects the conscious and unconscious bias in our decision-making. The nature of humanitarian work does not place those supporting and those being supported in equal standing – it is not equitable. Those who are forcibly displaced must rely on aid and handouts that we facilitate, working within a system that often does not provide a way out. Equally, our work creates a dependency that continues this cycle and perpetuates our power. We commit to work to challenge conventional aid structures, prioritize advocacy and partner with lived experience organizations or organizations that work in an empowering and collaborative way with communities to develop new strategies of working that facilitates independence.
- EC will respond without delay, and appropriately, to any allegation or cause for concern that a beneficiary of assistance may have been harmed, whether through one of our implementing partners or in another context. We also commit ourselves to challenging the abuse of power by anyone in a position of trust.
- EC will respect the cultures, customs, and traditions of all peoples, and will strive to avoid behaving in ways that are not socially acceptable in a particular cultural context. However, when the tradition or practice is considered by EC to be harmful and directly contrary to an international human rights instrument or standard, we will be guided by the applicable human rights instrument or standard.
- EC has a responsibility to protect people on the move and to avoid exposing them to further harm because of our actions. We also have a duty of care to all our volunteers.

4. What is safeguarding?

Safeguarding means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect.

In EC's work, we understand it to mean protecting people on the move from harm that arises from coming into contact with those who work or volunteer for or who represent EC, or whose presence is validated and authorized by EC.

For the purpose of this policy:

Child: Any person under the age of 18¹.

At risk adult: Sometimes also referred to as vulnerable adults. A person who is or may need care by reason of mental or other disability, age, or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. At EC we extend this definition to adults on the move, racial and ethnic minorities and the LGBTQI community. Notwithstanding these categories of vulnerability, E¹C also recognizes that adult males on the move may suffer discrimination and stigma associated with a racist narrative that view them as "dangerous male refugees".

Further definitions relating to safeguarding are provided in Annex 1.

¹ Reference: United Nations Convention on the Rights of the Child.

4.1. Scope

This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse, including sexual violence. These key areas of safeguarding may have different policies and procedures associated with them.

This policy applies to:

- The Directors of EC and all staff contracted by EC.
- Those who volunteer for or who represent EC, or whose presence is validated and authorised by EC².

5. Policy Statement

EC believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation, or ethnic origin has the right to be protected from all forms of harm, abuse, neglect, and exploitation. EC will not tolerate abuse and exploitation by staff or associated personnel.

We commit to having robust, accountable, and transparent systems for response, reporting, and learning when safeguarding risks materialize. Those systems include a duty of care to all actors to report incidents, allegations, and concerns, and to adopt a survivor centered approach³ to the alleged victim. Please see Annex 1 for a description of these terms and an explanation of their use.

Every person representing EC is required to bring to EC's attention all concerns or allegations relating to directors, employees (full time, part time and consultants), volunteers, visitors to its projects, and all those working on its behalf, such as journalists. They should do this through our safeguarding reporting system. EC commits to responding constructively and in a timely manner to reports or allegations that are made to us. Where necessary EC will seek the advice of external expertise.

We require that our partners' working practices represent a commitment to a safe, inclusive, and nurturing safeguarding environment for all. This is normally expressed via a safeguarding policy. Should a partner not have a safeguarding policy in place, EC will facilitate contact between the prospective partner and external expert assistance in order that the partner may develop one. EC is unable to support partners' policy development itself. Until it develops a safeguarding policy that is satisfactory to EC, partners must abide by EC's safeguarding policy.

To achieve this EC commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

5.1. Prevention

² Including but not limited to consultants, contractors, and visitors to the programmes, including celebrities, funders, journalists, and politicians.

³ <https://www.endvawnow.org/en/articles/1499-survivor-centred-approach.html>

EC's responsibilities

EC will

- Ensure that its Board has adequate oversight of our safeguarding arrangements, and the directors promote a fair, open, and positive culture that enables everyone involved to report concerns, confident in the knowledge that they will be heard and responded to.
- Implement stringent safeguarding procedures when recruiting, managing, and deploying staff, volunteers, and associated personnel as detailed in 4.1, above.
- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy and EC code of conduct through training and capacity building at a level commensurate with their role in the organization.
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with EC. This includes the way in which information about individuals in our programmes is gathered and communicated.
- Follow up on reports of safeguarding concerns promptly and according to due process.
- Ensure that beneficiaries and communities that are served by EC are aware of the organization's safeguarding policy, code of conduct and reporting routes.

5.2. Code of Conduct

EC has a code of conduct that describes the ethics and behaviors required of all stakeholders to ensure a robust safeguarding environment. It is designed to create a culture of safeguarding best practice. All staff members, volunteers, and all those who act on our behalf, will read, and sign it, and are expected to adhere to its values and minimum standards. Those making overseas visits are expected to uphold local law wherever it operates, except where EC code of conduct is more stringent, in which case this will apply. Breaches of the code of conduct are grounds for disciplinary action.

We require our partners to have their own code of conduct that clarifies the values, principles, and the acceptable behavior within their organizations and which influences and drives their organization's culture. Where a prospective partner does not have a code of conduct, EC is able to facilitate contact with external expert assistance. Until such time as the partner agrees a code of conduct that is satisfactory to EC, the partner must agree to use and apply EC's.

5.3. Partner Selection and Due Diligence

EC works with a range of partners to achieve its vision and mission. EC requires all partners who come into contact with beneficiaries of EC's assistance to report all serious safeguarding incidents to us. This will be in accordance with the requirements of the partner's safeguarding policy, or, when this is still being developed, with EC's safeguarding policy which the partner will be required to accept and implement as an interim measure.

5.4. Enabling reports

Responsibility for recognising and reporting safeguarding concerns applies across the organization and with our partners. EC will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to all staff contracted by EC, and to

those who volunteer for or who represent EC, or whose presence is validated and authorized by EC, and the communities we work with.

Designated staff are responsible for responding to safeguarding concerns. Roles and responsibilities for staff, directors and trustees with designated safeguarding responsibilities and accountability lines can be seen in internally published guidelines.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by EC's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

EC will also accept complaints from external sources such as members of the public, partners, and official bodies.

5.5. How to report a safeguarding concern

The reporting of suspected or actual abuse is a professional and organizational obligation. Failure to report information can lead to disciplinary action. All safeguarding concerns relating to EC staff/volunteers/board members must be reported to the Safeguarding Focal Point (SFP), in their absence, their line manager. If you are unsure whether a situation constitutes a safeguarding concern, you are encouraged to contact the SFP to discuss it.

If the person raising the complaint or concern does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be a director, a senior manager or a member of the leadership team, or the human resources team.

Your concern will be treated with respect and dealt with professionally. You can speak to the Safeguarding Focal Point (SFP) personally where this is possible, electronically (Zoom, Teams, Email) or by telephone. If you have witnessed an incident, you may be asked to document the details in a written report. A template will be provided to facilitate this. (Annex 2). If you are not able to do this, the SFP will help you. The SFP will document the discussion and agreed actions. Depending on the nature of the incident, they may make a report to the police, a referral to social care, and or file a Serious Incident Report to the relevant regulatory body and inform donors.

If the person raising the complaint or concern does not feel comfortable reporting to any person in the EC team, an anonymous report can be filled in.

5.6. Reporting concerns in partner organizations

Partners will be required to report serious safeguarding incidents through EC's Serious Incident Reporting form. A report from a partner should include the actions that are being taken to act on the concern raised. Allegations of inappropriate behavior between EC staff and partner staff/volunteers will be managed through EC's HR management processes. Allegations of inappropriate behavior between partner staff and volunteers/beneficiaries will be managed by the partner organization. Support can be sought from EC who will comment, and advise where necessary, on any steps being taken by the partner organization. Should the concern be connected to an allegation of harm, abuse or exploitation by the manager or coordinator of one of our partner organizations, EC will consider its capacity to support the partner's governing body to manage the investigation as appropriate to the situation. EC may seek external expertise where this is deemed appropriate. Decisions about suspending funding will be made following a risk assessment of the partner organization. If it is felt that the situation has not been dealt with in line with the severity of the incident, EC will advise on the next steps and, if appropriate, report

to the relevant authorities. The intention is to do this sensitively, in a non-judgemental manner and with the best interests of the people we support at the center of decision-making processes.

5.7. Recording

All concerns or allegations must be recorded as soon as possible, and the record will form the basis for sharing information with the SFP and onward referral.

Records will be kept in line with Data Protection requirements and information will be shared observing GDPR requirements. All incident reports will be clearly recorded with concerns raised and actions taken and securely stored with password protected access.

5.8. Response

EC takes all reports of safeguarding concerns seriously and will treat them professionally and confidentially, unless there is risk of immediate harm. EC will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations.

EC aims to acknowledge all reported concerns within 24 hours. It will then respond according to the severity of the incident. Serious incidents are regarded as those pertaining to alleged harm or an ongoing risk of harm to a beneficiary of EC's assistance and will be prioritized. The SFP will determine the degree of priority.

EC will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

5.9. Sanctions

EC will apply appropriate disciplinary measures reflecting our HR policy to staff/volunteers found in breach of policy.

If the partner remains high risk in relation to safeguarding, EC will take steps to terminate the partnership. Such actions will only be taken after careful consideration of all relevant consequences by the Board.

The SFP will present the results from the incident investigation and other relevant information, along with a recommendation for action to the trustee board via the CEO and Safeguarding Lead Trustee.

5.10. Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. EC will always seek and facilitate consent of alleged adult victims and children's caregivers before sharing safeguarding concerns with the relevant authorities, except where the caregiver is implicated in the concern. However, in cases where information suggests an immediate risk of harm, including by the caregiver, data protection legislation is not a barrier to sharing safeguarding concerns with relevant authorities. Those representing EC as staff cannot keep confidences when they involve concerns about a vulnerable adult or a child who is at risk or likely risk of harm. It is important that everyone providing services on behalf of EC is prepared to explain the limits of confidentiality.

5.11. Media and Communications

Through its use of photographs, video, and written case study material, EC commits to representing information about its partners and beneficiaries of its assistance in ways that respect the dignity of the people portrayed. EC will respect the wishes of the individual when requesting permission for photographs/video/written information.

EC will obtain informed consent from anyone whose photograph/video/case information will be used for the purpose of communicating EC's work. EC will not take photographs of anyone who is concerned about the use or impact of the image. EC will obtain consent from the parent or guardian for children under the age of 18.

Likewise, for an adult who lacks the capacity to provide informed consent, a family member/caregiver will be approached for consent on their behalf.

The quality of consent obtained is essential. If there is a real or perceived imbalance of power between photographer and the person being photographed, gaining true consent may not be possible. It is often the case that people receiving services or benefits find it difficult to refuse a request to be photographed. It is good practice to ensure that the subject of the photograph/video/case study understands how, when and where the information is going to be used and where it will be stored and for how long. Absolutely no payments or any other form of compensation are to be provided to any person being photographed/videoed in exchange for their video film or photograph or to encourage consent.

EC understands that in today's digital landscape, photographs can be shared widely beyond their original intent of use. Consequently, EC will work hard to ensure that individuals who have their photographs taken in relation to our work are used for the purpose for which consent is given. We will ensure that people who give us consent have clear pathways for contacting us through our communication and media teams and that they are aware that options to withdraw consent remain open, without a time limit.

When using photographs, video film or case study material the names of children will always be changed to protect their identity. EC's media and communication team will ensure that no photographs/videos of children or adults at risk will be used that could be regarded as degrading or sexually provocative. Photographs of beneficiaries of EC's assistance that are partially clothed or naked will neither be taken nor used. Photographs or videos will not be manipulated or taken out of context.

EC will ensure that any photograph or recorded case study history of a child or adult at risk does not place them in a position of harm or render them vulnerable to any form of exploitation or abuse. EC will disguise their identity and will not provide any information that could lead to a child or adult at risk being identified or tracked.

All social media and case studies used through digital channels generated by EC will be subject to the same safeguarding guidelines as outlined in this policy. Social Media Guidelines must be followed for all Marketing & Communications activities. Information about a child/children or adult at risk's life and any photographs/videos of children or adults at risk will be kept confidential in secure files. Access to photographs is limited to those that need them during the course of their work.

5.12. Implementation and Review

EC's safeguarding policy and code of conduct will be available to employees and volunteers via its intranet and to the wider public via its external website.

EC will provide safeguarding training to directors, employees, and volunteers. Refresher training will be provided as required.

EC employees with specific safeguarding responsibilities will be trained to receive and respond professionally to safeguarding concerns and allegations.

All EC partners will be informed about its requirements in relation to safeguarding arrangements that must be in place to safeguard all beneficiaries of EC's assistance that they come in contact with through their work.

Safeguarding will be integrated in our monitoring and evaluation activities.

The SFP will contribute to the quarterly trustee board reports by summarizing safeguarding activity, analyzing safeguarding data and trends, and identifying any key areas for improvement.

EC will continually evaluate its safeguarding practice and update its policy following an annual review.

Annex 1 - Glossary of Terms

At risk adult: Sometimes also referred to as vulnerable adult. A person who is or may need care by reason of mental or other disability, age, or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Beneficiary of Assistance: Someone who directly receives goods or services from EC's programme. Note that misuse of power can also apply to the wider community that the EC serves and can include exploitation by giving the perception of being in a position of power.

Child: Any person under the age of 18.

GDPR: General Data Protection Regulation. The General Data Protection Regulation (GDPR) is a legal framework that sets guidelines for the collection and processing of personal information from individuals who live in the European Union (EU).

Harm: Psychological, physical and any other infringement of an individual's rights.

Psychological harm: Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement, and isolation.

Protection from Sexual Exploitation and Abuse (PSEA): The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Safeguarding: This means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect.

EC understands it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff or programmes. Specifically:

- Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment from occurring; to protect people, especially vulnerable adults, and children, from that harm; and to respond appropriately when harm does occur.
- This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.
- Safeguarding applies consistently and without exception across our programmes, partners, and staff. It requires proactively identifying, preventing, and guarding against all risks of harm, exploitation and abuse and having mature, accountable, and transparent systems for response, reporting, and learning when risks materialize. Those systems must be survivor-centered and protect those accused until proven guilty.
- Safeguarding puts beneficiaries and affected persons at the center of all we do.

Sexual abuse: The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual abuse includes 'sexual violence', which is an all-encompassing, non-legal term that refers to crimes like sexual assault, rape, and sexual abuse.

Sexual exploitation: The term 'sexual exploitation' means 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 definition includes human trafficking and modern slavery.

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.

SAFEGUARDING INCIDENT REPORTING FORM

EC is committed to ensuring that every person associated with its work is safeguarded from harm. This form should be used to report any incident/concern related to EC staff, volunteers, trustees, consultants, and associated personnel.

Whereas we will take every effort to maintain confidentiality, we will act depending on the severity of the report or incident. We will always aim to seek consent before acting unless the contents of this form put you, or others, at immediate risk of harm or danger. In this case we are obliged to pass the concerns on, in a sensitive manner, to relevant authorities. We will always inform you of actions taken.

You may wish to submit your concerns anonymously. However please be aware that anonymised reports can limit further investigation. If you wish to disclose your name on a confidential basis, we will make every effort to maintain this confidence.

Please return this form to our confidential email: safeguard@europecares.org

1. Reporter's details⁴

Date and time	
Name of person making the report ⁴	
Your location	
Your contact details, including email address and phone number(s)	

2. Type of incident

Individual(s) involved	
Date and time of the incident	
Location of incident	
Identity the nature of the incident	Child Adult Sexual Safety / Safeguarding Safeguarding

⁴ If you would prefer to stay anonymous, you can leave this box empty.

	Exploitation Security

3. Details of allegations/concerns

Summary of the incident. Please state in a few words what the incident/concern comprises.	
Details of the incident. Who is supposed to have done what, to whom, when, where, who else was present? (please include facts, not opinions)	
Were/are there any (other) witnesses? ⁵ If yes, and where the witnesses are happy to be contacted by EC, please give their contact details.	
Are there any other factors you would like us to consider?	

4. Immediate action

Brief summary of any steps already taken.	
Has anyone else been informed of the matter? Please provide details of the name of the agency and of the contact person, and relevant email addresses and phone numbers.	

5. Preferred next steps.

⁵ We ask this question because witness testimony can help further investigation, however it is not required.

<p>What would you like to happen next in relation to this report?</p>	
<p>How would you like the Designated Safeguarding Lead to contact you about this report? Please give your email and telephone number.</p>	