

Child Safeguarding Policy

Nisma për Ndryshim Shoqëror
ARSIS

2020

Nisma për Ndryshim Shoqëror - ARSIS is a non-profit organization that was established in Tirana in February 2016 as a legacy of ARSIS – Social Organization for the Support of Youth. Ever since NISMA ARSIS has transformed itself into an influential non-governmental actor in the civil society sector in Albania and beyond. NISMA ARSIS helps to build a better future for disadvantaged children and their communities, with an innovative approach and practical, sustainable solutions.

Vision of ARSIS: Each child, young person, woman and family in Albania and beyond attains the right to protection, development and participation.

Mission of ARSIS: To promote the rights, to provide services and sustainable solutions for children, youth and families in vulnerable situations as well as for the marginalized Roma/Egyptian communities and other social groups in Albania.

Child Safeguarding Policy

These policies and related procedures describe NISMA ARSIS's commitment to Child Safeguarding. The purpose of the policy is to ensure that NISMA ARSIS is safe for children by promoting awareness and mitigating the risk of or actual harm that may come to children by employees, representatives, programming or operations.

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Definitions

- **Child:** is any person under 18 years of age. If the age of the person may not be determined accurately, but there are reasons to believe that the person is a child, they shall be considered a child in the sense of this law, until the age is determined according to the law in force.
- **Child Abuse:** 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 Child Abuse are Physical Abuse, Emotional Abuse, Neglect/Negligent Treatment, Sexual Exploitation & Abuse and Exploitation.
 - i. **Physical Abuse:** When a person purposefully injures, or threatens to injure, a child. Physically abusive behavior includes shoving, hitting, slapping, shaking, throwing, punching, kicking, biting, burning, strangling and poisoning. Physical injury or suffering may include but is not limited to bruises, marks, soft tissue swelling, hematomas, fractures, sprains, dislocation, burns, damage to organs, death, permanent disfigurement, and any other non trivial injury.
 - ii. **Neglect:** The persistent failure, where there are means, or the deliberate denial to provide the child with clean water, food, shelter, sanitation or supervision or care to the extent that the child's health and development is placed at risk.
 - iii. **Emotional Abuse:** A persistent attack on a child's self-esteem. This may occur as an isolated event or on an ongoing basis. Emotional abuse includes but is not limited to any humiliating or degrading treatment, failure to meet a child's emotional needs, and rejecting, ignoring, terrorizing, isolating or confining a child. Examples include, but are not limited to – name-calling, threatening, ridiculing, shaming, intimidating or isolating the child.
 - iv. **Child Sexual Abuse:** When a child is used by another child, adolescent or adult for his or her own sexual stimulation or gratification. All forms of sexual violence and coercion, sexual solicitation, manipulation or trickery including incest, early and forced marriage, rape, involvement in or exposure to indecent images/video (aka pornography), sexual slavery/trafficking, and statutory rape. Sexual abuse may include but is not limited to indecent touching or exposure, explicit sexual language towards or about a child and grooming. Sexual abuse does not always involve touching. 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.
 - v. **Grooming:** is the process in which an adult builds a relationship with a child or the child's caretaker to gain the child's or the caretaker's trust for the purposes of sexually abusing and/or exploiting the child. Grooming typically occurs in phases, and it can happen online or face to face, by a stranger or by someone the child or caretaker knows. Since it is a gradual process, it can sometimes be difficult to detect.
 - vi. **Exploitation of Children:** Comprises sexual abuse by the adult and remuneration in cash or kind to the child or a third person or persons. The child is targeted as a sexual object and as a commercial object. The Commercial Sexual Exploitation of Children constitutes a form of coercion and violence against children and amounts to forced labor and a contemporary form of slavery.
 - vii. **Online Child Sexual Exploitation:** Includes all acts of a sexually exploitative nature carried out against a child that have, at some stage, connection to the online environment. It includes any use of Information and Communication Technologies (ICT) that results in sexual exploitation or causes a child to be sexually exploited or results in or causes images or other material documenting such sexual exploitation to be produced, bought, sold, possessed, distributed or transmitted.

- **Child Labor:** Often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that is mentally, physically, socially or morally dangerous and harmful to children and interferes with their schooling and recreation. In its most extreme forms, child labor involves children being enslaved, separated from their families and exposed to serious hazards and illnesses.
- **Child Marriage:** A formal marriage or informal union before age 18, is a reality for both boys and girls, although girls are disproportionately the most affected. Child marriage is widespread and can lead to a lifetime of disadvantage and deprivation.
- **Child Trafficking:** Relates to any role in the recruitment, transportation or receipt of children for the purpose of exploitation, by means of threat, force or other forms of coercion. This includes abuse of power.
- **Child in need of protection:** is the person under 18 years of age, irrespective of having the capacity to act, according to the legislation in force, who may be a victim of abuse, neglect, exploitation, discrimination, violence or any criminal activity, and also the individual under the age of criminal responsibility, who is alleged to have committed or accused of the commission of a criminal offence, and the children in conflict with the law.
- **Child protection:** is prevention of and response to violence, abuse, exploitation and neglect of the child, including kidnapping, sexual abuse, trafficking and child labor.
- **Child participation:** is an ongoing process of active involvement of the child and respect for the right of the child to express views and to be heard at all levels of decision-making in issues related to the child.
- **Child Safeguarding:** The set of policies, procedures and practices that are employed to ensure that NISMA ARSIS is a child safe organization. It involves our collective and individual responsibility and preventative actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm by NISMA ARSIS staff, representatives and third parties, who come into contact with children or impact them through our development interventions, protection responses and operations. This includes our direct program implementation, work through partners and management of children's personal data.
- **Child Welfare:** Child Welfare is making the community safe for children. It includes claims of child abuse that happen external to Save the Children and/or that are required by law or local norms to be reported to local authorities, which may include familial, communal or institutional child abuse allegations.
- **Family violence:** Includes verbal, physical, sexual or emotional violence within the household or family, which the child witnesses, usually on a regular basis.
- **Contact with Children:** Working on an activity or in a position that involves or may involve direct (including online contact with children) or indirect contact (such as use of children's images) with children. This can be either under the position description or as a result of performing the position such as coming into contact with children when working in communities.
- **Working with Children:** Working with children means being engaged in an activity with a child where the contact would reasonably be expected as a normal part of the activity and the contact is not incidental to the activity. Working includes volunteering or other unpaid works.

Introduction

Child Safeguarding Policy and its procedures are applied to all operations and activities conducted by, or on behalf of Nisma për Ndryshim Shoqëror ARSIS. The policy recognizes and strengthens our commitment as an organization towards keeping children safe and protecting them from all forms of harm and abuse. Nisma për Ndryshim Shoqëror ARSIS provides protection to every child, youth and their families in vulnerable situations and upholding children's rights and their wellbeing is crucial for our work.

The aim of the child safeguarding policy and procedures is to regulate how we work as an organization so that the children with which we come into contact (either directly or indirectly) are safeguarded and have their well being promoted, and that our actions, while implementing programs or institutional activities, do not cause any harm to children. The child safeguarding policy is a statement of the professional expectations the organization has of its employees and others when they come into contact with children in the course of their work. All employees and other adults in contact with children shall be aware of its requirements bearing in mind that a "Duty of Care" exists whereby employees and others not only have to apply principles of good practice in their work with children but have in addition a responsibility, and in many cases a legal duty, to ensure the protection and safety of children in their care. Children are vulnerable to the risk of harm from a variety of sources and employees and others have a responsibility to reduce risk by challenging bad practice and thereby identifying and mitigating risks to children with whom they work.

Statement of commitment and guiding principles¹

This document is written in accordance with the national and international legislation and norms concerning children and youth rights, safety and support.

The best interest of the child shall be the primary consideration in any child-related actions. Children are protected and promoted in all situations and in any context.

In all actions concerning children and when dealing with a concern for the safety or wellbeing of a child, the best interests of the child shall be our primary consideration. NISMA ARSIS believes children have the right to be active participants in all matters affecting their lives; that they can make choices and decisions; that they have the right to share the power adults hold and that they have a voice to influence people and events. Decisions made about children and young people will be made as far as possible with their participation and in their best interest giving full consideration to how such decisions will affect them. There may be times when adults have to make decisions for children in order to protect them from harm, but their best interest will be at the heart of those decisions at that time. In the event this policy is

¹ ▪ Convention of the Rights of the Child (CRC), which provides the international framework for the right to protection from all kinds of violence (article 19), discrimination (article 2) and different forms of exploitation (articles 32.36).

▪ Resolution S-27/2 A world fit for children (2002) and General Comment number 13 (2011) by the Committee on the Rights of the Child regarding the Right of children to not be subjected to any form of violence, which establishes the protection of children and adolescents as an absolute priority.

▪ Child Safeguarding Standards, from the network Keeping Children Safe.

▪ Child Safeguarding Policy Guidelines, from Child Fund Alliance. Similarly.

▪ The Minimum Standards for Child Protection in Humanitarian Action (2012), elaborated by the Child Protection Working Group.

breached causing harm, NISMA ARSIS is committed to listening and acting according to the wishes of the child as it is defined in the Law.18/2017 “On the rights and protection of the child”.

All children, without exceptions of any kind, have the right to be protected against any form of violence and to have their dignity respected

Any type of violence against children or between children is a violation of their rights

Zero tolerance of child abuse and exploitation and all types of violence against children, NISMA ARSIS has a zero-tolerance approach to child abuse and exploitation. This is enacted via robust prevention and response work, offering support to survivors and holding those responsible for harm and intolerable behavior to account. NISMA ARSIS will ensure all those associated with the delivery of our work have access to information about how to report concerns or allegations of child exploitation, abuse or other breaches of this policy and will take immediate action upon report of any suspected breach.

Everybody has a responsibility for safeguarding

This policy is mandatory for all those who work for or on behalf of NISMA ARSIS, including employees, volunteers and partners. Although training, advice and support will be provided, everyone should actively participate so that they can carry out their responsibilities towards safeguarding children.

Active safeguarding and positive treatment network within the organization is promoted, joining forces so that children are protected effectively

Child safeguarding is a priority, recognizing that situations of abuse and harm are able to flourish when staff, volunteers, partners, children, families and community members do not feel able to raise their concerns. A positive treatment culture is promoted, and emphasis is placed on and efforts are made to provide safe environments (in the center, in the family and in the community) which allow for the positive development of children, taking into consideration the specific situation of children those with particular characteristics within their communities.

All reports of concern regarding the safety and protection of a child will be taken seriously

Where necessary, appropriate steps will be taken to protect the child and to take action against the alleged perpetrator. This may include referrals to law enforcement and child protection agencies. In relation to allegations against staff, volunteers and partners, action may also include the suspension or termination of engagement or any type of cooperation. NISMA ARSIS responds to any case of violence, abuse and exploitation, whether it is suspected, attempted or carried out, always in accordance with the nature of the case, in a careful manner and with a guarantee of confidentiality.

Confidentiality

NISMA ARSIS is committed to confidentiality in sharing sensitive information in relation to child safeguarding incidents reported to us. Information that identifies individuals will only be shared with due consideration to the safety of the child, witnesses or subject of complaint, or to protect the integrity of an investigation.

Commitment to good practice

We raise awareness and influence others on the importance of safeguarding children, using our policy and procedures as a way of both highlighting our commitment and also of explaining our values. We will share our policy and procedures with others, and be open to feedback regarding its application and relevance. There is no one specific way of safeguarding children and promoting their rights. Solutions to protecting children need to reflect the culture and operating environment and the nature of activities being undertaken. Where possible, children's opinions are collected and used to guide the design, implementation and review of this Child Safeguarding Policy which, in any case, shall be an instrument which is perfectly well-known and understood by the children themselves.

Policies

NISMA ARSIS has developed this policy as a statement of intention towards safeguarding the welfare of children in its care. It is intended that this policy must be used, internally, for communication and training purposes, and externally, for briefing and public dissemination.

NISMA ARSIS Safeguarding Policy aims to:

- ensure that the organization undertakes its responsibilities with regard to protection of children and will respond to concerns appropriately;
- provide guidance to employees and others and define expectations in dealing with preventing, raising, reporting and responding to concerns of cases of harm abuse;
- reduce the risk of harm and abuse through the recruitment and selection of employees and others;
- make sure that procedures to protect children report any concerns about their welfare to appropriate authorities shall be followed;
- reduce the risk of harm and abuse by developing an open and aware management culture within the organization;
- promotes good practice, providing children with appropriate safety/protection whilst in the care of NISMA ARSIS and to allow staff and others to make informed and confident responses to specific child protection issues.

NISMA ARSIS' Safeguarding Policy states:

- NISMA ARSIS determines to promote the rights of the child in its projects, programs and activities and therefore determines to fight harm and abuse as a major issue;
- All employees and others at NISMA ARSIS are clear about their roles and responsibilities in the prevention of abuse and harm;
- All employees and others at NISMA ARSIS are clear about how to receive, respond and report concerns of abuse they should arise.

Policy Implementation and Procedures

Prevention is the cornerstone of the protection and safeguarding of children. NISMA ARSIS commits to preventing harm to children through the following areas:

1. Risk Assessment and Management

NISMA ARSIS carries out regular risk assessments to its staffing, programming and operations and develops appropriate actions to manage identified risks.

2. Child-safe Recruitment

NISMA ARSIS acknowledges that creating safe environments for children starts with the appointment of suitably qualified, skilled and vetted staff that has the desired competencies and skills to carry out their function in an effective, efficient and safe manner. The recruitment processes used within NISMA aim to be in the best interests of children and will reflect our commitment to protect children and prevent abuse.

Recruitment of staff

In addition to NISMA's standard recruitment processes, the following child safeguarding measures are applied:

- Recruitment adverts or application details shall state that the—'recruitment is done in line with safe recruitment practices.
- Clear definition of jobs and roles descriptions with clear reference to safeguarding responsibilities, and clear specifications of roles containing core, competency concerning child protection.
- Shortlisting through a formal application process, that shall be based on criteria set in accordance with the job/role's specifications, required qualifications and principles of Safeguarding Policy.
- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification.
- Formal job offers are made after checks for suitability in line with this Policy and in conjunction with job's specifications. Therefore any document concerning health, education and generally any necessary information may be requested, provided that it is absolutely necessary for the certain purpose, its use will be strictly limited within this purpose and it is in line with the privacy and data protection legislative principles.
- All applicants will be required to undergo relevant vetting processes (which may include police criminal background checks, subject to local jurisdictions) and, starting employment with NISMA, will sign a declaration stating that there is no known reason or event that would render them unsuitable for the post, and declaring any criminal convictions or ongoing criminal prosecutions against them (see Appendix 4 for sample).
- Applicants will also be required to submit the names of two referees who will be asked to provide references, including the referee's considered view on the candidate's suitability to be in contact with children. NISMA reserves the right to follow up with any previous employer.
- The successful applicant will only be offered a position subject to: (a) suitable references; (b) proof of qualifications; (c) relevant vetting/ clearance procedures; and (d) positive proof of identification.

Selection of consultants 'working with children'

All consultants or other contractors identified as working with children will be required to undergo relevant vetting processes (which may include police criminal background checks, subject to local

jurisdictions), Prior to deployment, he or she will sign a declaration stating that there is no known reason or event that would render them unsuitable for the post, and declaring any criminal convictions or ongoing criminal prosecutions against them.

3. Volunteers and visitors

This section specifically considers safeguarding issues in relation to the different types of occasional volunteer support to NISMA ARSIS activities or visitors to programs, daily community centers and premises.

- Official visitors may visit a project with the express permission of NISMA ARSIS;
- All visitors should report to the Reception on arrival and sign in The Visitor's Statement;
- It is the responsibility of the staff member to ensure that visitors and volunteers are properly briefed and supervised throughout the activities or visit;
- All occasional volunteers and visitors must be accompanied at all times and in no circumstances should they be left unattended with children;
- All staff and regular volunteers will be required to provide all the proofs mentioned at chapter 3.2 *Safe Recruitment*. This is to help ensure that inappropriate people are prevented from working with children.
- **Recruiting volunteers:** If the agreed responsibilities involve contact with children, the recruiting and selection process does not differ from the approach used to hire permanent employees or consultants.
- In case they refuse to commit to or they do not comply with their written declaration commitment to respect the current Policy and mandatory code of conduct their volunteering shall be terminated and/or visit will be ended.

4. Code of Conduct

All those covered by the policy commit to respecting, promoting, upholding and protecting, at all times, the rights of the child as set out in the UN Convention on the Rights of the Child. The standards of behavior set by the Code (in bullets below) are required of all those covered by this policy in respect of their conduct towards all children. Adherence to these standards will be interpreted within the framework of the UN Convention on the Rights of the Child. Anyone found to be in breach of the Code will be subject to disciplinary action, up to and including dismissal or termination of employment or other arrangement with the organization.

- Always treat children with respect regardless of their sex, ethnic or social origin, language, religious or other beliefs, disability, sexual orientation, gender identity or other status.
- Use language or behaviour towards children that is at all times appropriate and in no way harassing, abusive, sexually provocative or demeaning.
- Wherever possible, ensure that another adult is present when working in the proximity of children and when inviting children home, unless the relevant precautions have been taken.
- Inappropriate use of any computers, mobile phones, video/digital cameras or other electronic devices, including to access, view, create, download or distribute online sex abuse images of children, is prohibited.
- Physical punishment or discipline or use of inappropriate physical force of any kind towards children is prohibited.
- The use of children for domestic or other labor is prohibited when it: is inappropriate for the child's age or developmental capacity; interferes with the time available for education and recreational activities; or places him or her at significant risk of injury, exploitation or abuse.
- Immediately report any concerns, suspicions, incidents or allegations of actual or potential child abuse or any breaches of this policy in accordance with appropriate Procedures and to

the Designated Officer (see below), charged with receiving such complaints. The person who makes a report in good faith will not be subject to retaliation. A person may report on an anonymous basis; although that may impede the Designated Officer's ability to thoroughly investigate the allegations.

- Sexual activity with children is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
- Sexual exploitation and abuse by organization workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
- Any sexual relationship between those providing assistance and protection and a person benefitting from such assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
- Organization workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.¹
- Personal conduct outside work or engagement with NISMA ARSIS actions taken outside working hours that are seen to contradict this policy will be considered a violation of the policy. NISMA employees are required to adhere to principles of the Child Safeguarding policy both at work and outside work. Common sense will prevail in applying this to staff's private lives.

5. Education, Training and Support

Awareness raising and training

NISMA ARSIS understands that, for the policy to be well understood and effectively implemented, it is essential that there are high levels of awareness and knowledge regarding the policy and that staff and others are clear, confident and competent in putting the policy into practice.

NISMA, therefore, commits to:

- Disseminate and promote the policy in a range of ways (e.g., website, hard copies and verbally). Copies of the policy will be made available and accessible to all stakeholders, both in hard copy and electronically.
- Regular briefings and training will be provided as part of the roll-out of the Policy and these, or elements of these, will be incorporated into standard induction processes for all staff. Training on the policy will be compulsory and will be carried out annually. Newly recruited staff will receive induction sessions and will participate in the next available training. The PO will decide upon the timing, depending on the role the staff member has within the organization, but in any event will be within 3 months of commencing employment or before the probation period ends.
- NISMA will ensure access to regular training updates and refresher courses to ensure that the policy continues to be embedded and that staff is made aware of changes and developments to the policy and its implementation.
- In addition, NISMA will ensure further training is provided for staff with specific responsibilities under this policy. These groups would include anyone working directly with children and the Designated Officer. Training provided to managers and staff designated to receive and respond to complaints and protection incidents will support those staff in making effective and appropriate responses.

¹ IASC Six Core Principles Relating to Sexual Exploitation and Abuse

- NISMA will provide staff with access to materials and resources that support understanding and implementation of the policy.

6. Child-safe Communication

The public use of images and stories of children can pose potential protection-related risks to them. It is therefore important to have the child's best interests at heart when using their images and stories. This entails respecting their dignity and rights, including the right to privacy and their right to be heard. Consent should always be gained before taking images of children. NISMA ARSIS staff should ensure that:

- any images taken by the staff have gained the written or verbal consent of children and their caregivers;
- images or stories do not reveal the identity or location of the child;
- care is taken to preserve the identity of vulnerable children;
- images depicting children that are taken during site visits are not used on NISMA ARSIS staff's personal social media accounts.

7. Program design and implementation

Programs and all type of actions across all sectors, not just child protection programs, should 'think safeguarding' at all times and across all activities – and not consider safeguarding as a separate activity, but rather a theme that runs through all work.

- Safeguarding must be considered at every stage, from project/program design and must be reviewed regularly as part of the monitoring of the project's implementation.
- In addition to program design, when conducting specific activities (residential and non-residential) – such as consultations with children or a summer activities scheme – a risk assessment must be undertaken to identify any potential dangers and a plan put in place to minimize these risks.
- If necessary, additional guidance must be given to staff, volunteers, partners, children and communities in order to ensure that the spirit of the Safeguarding Policy is met for specific activities or programs, for example, to highlight particular dangers or concerns.
- Before activities are conducted, the written permission of both parents and children must be obtained. See Appendix 3 - Parental Consent Form. Where parents/children are illiterate, a staff member or standing volunteer can sign on their behalf in their presence, so long as the form has been discussed.
- Staff and volunteers who work with children must be supervised on a regular basis, and given the opportunity to participate in discussions about safeguarding issues – for example in meetings, informal discussions or through considering case studies.
- Safeguarding must be reviewed regularly throughout activities and at the end of activities, so that either lessons learned can be fed into future activities or necessary adjustments made as the program proceeds. For example, during a summer activities program it would be useful at the end of each day to include a review of safeguarding during debriefing meetings.

8. Reporting and Responding to Child Safeguarding concerns

NISMA ARSIS is committed to responding to all reports or indications, including rumors, that suggest a child may be harmed or at risk of harm. The safety of children must be of paramount concern at all times. The Child Protection Officer (PO), is responsible for ensuring that the reporting procedure outlined below is followed, so that suspected cases of abuse and/ or breaches of the Child Safeguarding policy by NISMA staff are responded to appropriately and referred promptly to the relevant authorities as required.

Child Protection Officer

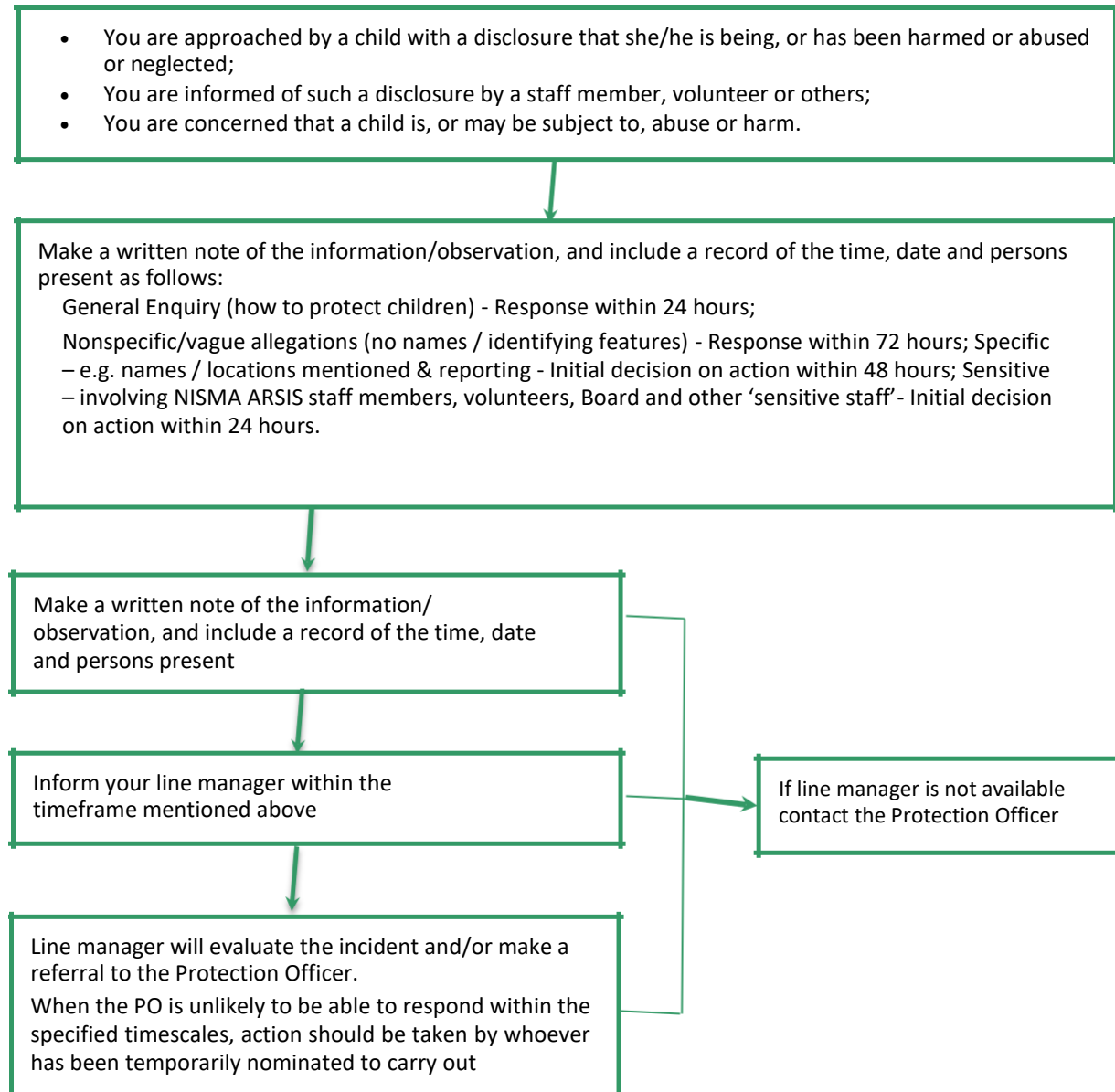
A Child Protection Officer (PO) is the focal point for reporting and referring to concerns regarding child protection issues and for coordinating the necessary interventions and follow up. For the purposes of our protection procedures the functions of the PO will be carried out by the manager of the child protection program. However when the PO is unlikely to be able to respond within the specified timescales, action should be taken by whoever has been temporarily nominated to carry out the role of the PO. Any temporary nomination will be by the Executive Director and will be communicated to all staff. The role of PO will only be delegated to a member of staff who has the necessary knowledge, skills and training to undertake the role. Where such a delegation is necessary, the appointment will be formally communicated by the Executive Director.

Our Protection Officer (PO) is responsible for:

- Providing a written record of any formal referral to the Executive Director within 24 hours. A line of reporting from the PO to the Executive Director of NISMA ARSIS ensures that all decisions are taken in consultation and with the knowledge and approval of those with overall responsibility for the organization;
- The first step of any reported incident is to ensure the safety of the child/ren concerned;
- All reports and concerns should be recorded using the form in Appendix I;
- Ensuring that written records of concerns about a child are kept even if there is no need to make an immediate referral;
- Ensuring that all such records are kept confidentially and securely and are separate from case files/data's, with a front sheet listing dates and brief entries to provide a chronology;
- Ensuring that an indication of further 'child protection related' record keeping is marked on the case files;
- Disciplinary measures taken as a consequence of the breach of the policy will be proportionate and justifiable to the nature of the breach. Situations will be reviewed on a case-by-case basis prior to applying sanctions proportionate to the breach. The reporting mechanisms and referral pathways will be widely publicized and accessible.
- Acting as a focal point for staff to discuss concerns and liaising with other agencies and professionals;
- Attending child protection conferences (or delegating this requirement to another appropriately informed member of staff);
- Keeping themselves up to date with knowledge to enable them to fulfill their role, including attending relevant trainings;
- Providing advice and guidance to colleagues, attending inter-agency meetings (or supporting other staff to do so) and contributing to assessments.

Reporting and referral procedures

What to do if you have concerns for the safety of a child:



Does the child need urgent medical or police attention?

Yes - Contact emergency services immediately. Stay with the child until emergency services have taken over, contact PO and fill the form.

No – Contact PO

What to do if in the case of allegations about a staff or others:

You are concerned that the behavior of a member of staff or other person is threatening, or potentially threatening, the well-being of a child.

Report your concerns immediately to the Protection Officer.
Where appropriate, relevant mitigation may be initiated and/or a referral made to an external agency.

In all situations, you must provide an outline of your concerns in writing. If the matter is referred to external agencies or the police, you may be asked to provide a formal statement of your concerns for subsequent external investigations.

In the absence of the person who has authority to make decisions, if a child is in a life threatening situation, the most senior staff member available has authority to make any decisions necessary in order to protect the child from the immediate danger. Any decision made and actions taken should be reported to the PO and the Executive Director.

Please note: If you have immediate concerns that a child is at risk of significant harm contact the Protection Officer/Executive Director. If you think a criminal offence has been committed contact the police.

Policy Management

1. Roles and responsibilities

All staff (including permanent staff, contractors, partners, volunteers) are bound to the principles and guidance laid out in this policy and linked policies. Specifically, staff, within the context of each define role/job position, is expected:

- to use the required procedures;
- to promote good practice and to contribute to discussions about safeguarding;
- to ensure that the voice of the beneficiaries, children, to the protection of which the current Policy is concerned is listened and it is taken into account;
- to respect the professional boundaries and professional code of conduct referred in this document. NISMA ARSIS Board Members², PO and the Senior Management Team are bound by this Policy and have the additional responsibilities:
 - to appropriately put in place this Policy and make sure that it is accessible to any concern person;
 - to monitor and review the Policy;

² NISMA ARSIS program managers trained and with extensive expertise in child protection

- to ensure that all staff have access to appropriate training/information;
- to make sure that sufficient resources (time and money) are allocated to ensure that the policy can be effectively implemented;
- to receive staff and beneficiaries' concerns about safeguarding and respond to all seriously, swiftly and appropriately;
- to keep up to date with local arrangements, develop and maintain effective links with relevant agencies
- to have the final responsibility for the implementation, monitoring and reviewing of the current Policy.

It is the responsibility of staff to be vigilant, have knowledge and awareness of the indicators of harm, neglect, potential or actual abuse and to report any concerns, suspicions or allegations of suspected abuse immediately and ensure that the concern is taken seriously and reported.

2. Policy's monitoring

- recruitment and selection procedures will be continually updated/improved;
- formal briefings and raising awareness will be aimed at all employees and others;
- all posts will be risk assessed according to the level of contact with children;
- PO will be responsible for the implementation of the policy;
- reporting of concerns of child abuse will become mandatory for all employees and others;
- local procedures for raising and reporting concerns of child abuse will be developed.

3. Communicating and commitment to the Policy

NISMA ARSIS will make beneficiaries aware of the Safeguarding Policy, using appropriate means that are in line with the age and the specific profile of each beneficiary, so as to ensure that the principles and procedure of this policy are adequately understood. Indicatively, these means may be:

- Easily accessible and comprehensive information pack on safeguarding arrangements, e.g. through brochures, documents, web displayed information etc.;
- Discussion and agreement with each beneficiary about safeguarding arrangements and concern/complaint procedures.

Any person such as sponsors, volunteers, contractors, suppliers, donors, journalists, consultants, supporters (occasional visitors) who visit NISMA ARSIS infrastructures or offices and may come into contact and/or interact with children:

- are given a copy of this Policy and be made aware that they must act in accordance and comply with it whilst visiting NISMA ARSIS infrastructures or offices;
- declare their written commitment to respect and comply with the safeguarding policy principles;
- are properly informed on the report process and report any concern for the wellbeing of a child to the PO.
- Prevention
 - By raising awareness of child abuse and risks to children through the implementation of this policy;
 - Protection;
 - Minimizing the risks to children by risk assessment of all positions where contact with children occurs and promoting awareness of child abuse;
 - Applying 'best practice' in recruitment and selection;

- Protecting and supporting children, employees and others where suspicion, allegations, disclosure and witnessing of child abuse occurs;
- Rehabilitation and integration
 - Raising concerns and reporting suspicions, allegations, disclosures and witnessing of child abuse internally within NISMA ARSIS and, where appropriate, to relevant competent authorities;
 - Knowing beforehand, what steps to take and whom to contact, in the event of child protection concerns;
 - Protecting and supporting children, employees and others experiencing child abuse through psychological, medical and legal means where necessary.

4. Reviewing of the Policy

The policy will be reviewed every year or in the following circumstances:

- changes in legislation and/or government guidance;
- as a result of any other significant change or event;

Annually, NISMA ARSIS shall conduct a self-assessment of safeguarding and the implementation of the Child Safeguarding Policy. The assessment will be carried out using a prescribed template. Based on the self-assessment, an annual plan of action will be developed to address any gaps in policy implementation and to mitigate any risks identified.

Appendix 1: Child Safeguarding Policy reporting and recording format

1. DETAILS OF THE CHILD/CHILDREN

Name: Gender: Male ☐ Female ☐

Age: Date of Birth:

Address:

Language/s spoken:

Additional factors that might increase risk:

Other relevant information:

-Name and contact details of parents/legal guardians/caretakers

Name: Gender: Male ☐ Female ☐

Age: Date of Birth:

Address:

Language/s spoken:

Any disability:

-Referral's Details

Time: Date:

Place:

Name: Contact:

Occupation: Relationship to child:

2. DETAILS OF THE ALLEGED PERPETRATOR/SUBJECT OF CHILD PROTECTION CONCERN

Name:

Gender: Male Female

Nationality:

Age:

Address/current location:

Language/s spoken:

Relationship to victim:

3. DESCRIPTION OF INCIDENT

What happened? *Please describe the incident as closely as possible to what you were told or to what you witnessed? Mention time, location and persons involved/ **(including child's words if possible)**:*

-Current safety of child including location:

-Has emergency medical attention been required?

Provided by:

-Any other relevant information or comments?

-Who else knows? Include contact details.

Agencies:

Family members or other individuals:

4. ACTIONS TAKEN TO DATE (referral to police, children's services, social welfare; Give contact details and date and time of actions.

5. LESSONS LEARNED; RECOMMENDATIONS; over ACTION TAKEN AND APPENDICES

Lessons learned (strengths and weaknesses in areas such as the policy and its implementation, management, recruitment, supervision etc.): Recommendations (recommendations to prevent possible abuse and improve the investigation process in the future): List of appendices/other documentation (e.g. interview reports, file notes, correspondence)

-Referral taken by (where possible, the Dedicated Child Safe-guarder):

Name: Position and Location:

Date: Signature (on hard copy):

Completed by:

Date:

Name:

Signature:

Appendix 2: Code of Conduct

Professional boundaries are established to safeguard the professional integrity, the correct detachment and the proper relationship between a support worker and a beneficiary, and they are based on a mandatory code of conduct.

The following boundaries and rules apply to and bind all directors, managers, consultants, designated staff (permanent staff, contractors, external partners) and volunteers and dictate their duty to never ignore or omit to report any concern, suspected violation or violation of the current safeguarding policy principles and arrangements:

- Treat every child equally and respectfully, without any form of discrimination, racist, xenophobic behavior and approaching them with positive, friendly and non-violent ways, with respect of their personal and cultural identity in line with the principles stated in the current Policy.
- Respect for the children's right to be heard and to participate in the procedures and decisions that concern them, inform, encourage and empower them towards the claiming and realization of their rights.
- Respect for the principles of trust, confidentiality and personal data protection. In conjunction with these principles, a safe information sharing process among the competent involved professionals/ stakeholders shall be followed. It is noted that any information, data, photo concerning the beneficiary's personality and story shall be published only under his/her explicitly given permission, and provided that he/she is not exposed to any danger or risk of stigmatization. Special care shall be taken concerning the children's cases (see below).
- It is prohibited to:
 - Develop personal relationships between a member of staff (paid or unpaid) and a beneficiary who is a current service user, and to enter into a personal relationship (including social networks) with a person who has been a service user over the past 12 months;
 - Passing on service users' personal contact detail;
 - Accepting responsibility for any valuables on behalf of a beneficiary;
 - Use of abusive language or response to inappropriate behavior / language and the use of punishment or chastisement, or any abusive behavior
 - Behave in a disrespectful way (for example using disrespectful vocabulary or bad manner toward anybody etc.) and working under the influence of drugs or alcohol. It is reminded that they must behave with modesty and dignity and serve as role- models of behavior for children;
 - Never watch, publish, produce, or share pornography showing children, and/or show pornographic material to children at all times, during and outside work
- Especially with regard to children, it must be ensured that:
 - Never a staff member or volunteer is left alone with a child for any reason;
 - Never a child is used as an interpreter in processes and responsibilities (such as interview, social history etc.);
 - Never fondle, hold, hug, kiss or touch children in an improper way, taking into account what the child itself believes is improper, based on their cultural, ethnical, religious background and their gender;
 - Never collaborate with any private actor that acts in any way against the best interest of the child;

- Never have any form of sexual relations with anyone under 18 years old at all times, never touch children or use language or make suggestions in an inappropriate manner, never provoke, harass or degrade the child or show disrespect for cultural practices.
- Never behave in a way that has negative impact on the child's confidence and self-worth;
- Never exploit a child for labor (ex. through domestic work);
- Never show children's faces in presentations or publications and never publish a story or image which may endanger the child, their family or community or stigmatize the child;
- Never give or encourage other people to give money directly to children, especially those being in vulnerable situations such as victims of exploitation, unaccompanied minors, victims of trafficking and children in street situation;
- Never use any information or image of the children without the written permission of children's parents/guardians and take into account the children's will and opinion, without forcing them to any kind of public exposure. Any information or photo concerning the children's story shall in no way expose them to any danger or to any risk of stigmatization: in any case, such information or images, information, photos.
- NISMA ARSIS does not allow paid or unpaid staff to give gifts/money to or receive gifts/money from beneficiaries. However gifts may be provided by the organization as part of a planned activity.
- It is also reminded that each of the aforementioned professionals is additionally bound to the principles and rules of his/her professional code of conduct; the latter code is the one that is formally and legally approved by each competent professional union in accordance with the Albanian legal framework.
- If a case of conflict of interests arises, the person/professional in concern shall refer and discuss it with the designated manager/Director and Board of NISMA ARSIS.

If the professional boundaries and/or policies are breached this could result in disciplinary procedures or enactment of the allegation management procedures. A written declaration shall be provided confirming the reading, understanding and agreement with the current Policy and the mandatory code of conduct and declaring the commitment to work in accordance with it, also including the agreement that any failure to uphold it may result in the termination of their engagement with NISMA ARSIS or further disciplinary or judicial proceedings as mentioned above.

Appendix 3: Parental Consent Form

NISMA ARSIS is an organization that exists to support children, youth and their families and communities in vulnerable situations and development contexts. We are proposing different activities involving your child. Before starting this collaboration, we need your consent, and also some important information from you to ensure that your child can participate safely and their welfare can be promoted. All information will be kept confidential and only shared with adults who need to know to make sure that your child is properly cared for. For the purposes of all trips and events a child is defined as anyone who is under 18 years old. Our guiding principle is that in all situations the best interests of the child are of the utmost importance. This means that in all actions and decisions we must consider the needs and rights of the child as the critical issue.

Activity Consent (Please tick as appropriate):

☐ I/we give my/our consent for my/our child (name of child) to travel to and participate in NISMA ARSIS activities.

☐ I/we authorize NISMA ARSIS to be responsible for my/our child during these activities and authorize them to make decisions concerning any emergency medical treatment for my/our child which may be required during this trip/activity.

☐ I/we affirm that I/we have full authority to give the consent provided for in this document.

Media Consent (Please tick as appropriate):

☐ I/we give my/our consent for my/our child to take part in media activities which may include photographs, films, videotapes audiotapes, or other forms of recording and which may appear in print (such as newspapers) or online.

☐ I/we DO NOT give my/our consent for my/our child to take part in media activities. I/we confirm that I/we have read and understood the Parental Form, and agree to abide by its contents.

Name of the child

Date at

Name and Signature (names of parent(s)/carer(s))

Appendix 4: Declaration for Staff and Consultants of NISMA ARSIS

To be appended to contract of employment or consultancy

- I have read and understood NISMA ARSIS's Safeguarding Children Policy and accompanying Procedures and Guidance.
- I agree to abide by NISMA ARSIS's Safeguarding Children Policy and Procedures.
- I also declare that I have disclosed to NISMA ARSIS any issue which could give rise to any child protection concern — real or perceived — regarding my suitability for employment or consultancy. I confirm that I have no criminal prosecutions pending, nor have I been previously convicted of any offence involving inappropriate conduct with children.

Name and Signature

Date

Appendix 5: Guidelines for using images of children

Risks

The public use of images and stories of children poses potential protection-related risks:

Images containing personal information can be used as a means of identifying children, making contact with them at a distance or even tracing them to where they live.

- Images may be altered or adapted for inappropriate use.
- Displaying and using inappropriate images, stories etc., or images and stories for which consent and permission have not been obtained is unethical and may lead to increased organizational risks, such as reputational damage.

1. Personal information about a child (such as full name and date of birth or full names of family members) and information that could be used to identify his/her specific location within a country (such as village or community names, school, parish, etc.) should not be used, especially where this is linked to an image. The maximum information given about a child should be the first name and name of the district in which they live.

2. Children that have experienced violence, exploitation, have been otherwise abused or are in some way particularly vulnerable or at risk if identified, should not have their faces displayed or in any other way be represented in a way that may lead to their identification. In addition, their real names should be changed, and this change be indicated. Other identifying details should also be changed.

3. Images of children in states of undress should not present them in poses that could be interpreted as sexually suggestive or in ways that impact negatively on their dignity or privacy.

4. All images and stories, along with accompanying details of individuals, should be used and kept according to relevant data and privacy laws. It is recommended that: images are stored securely (e.g. lockable safe/ cabinet, electronic files password protected, limited access etc.); and images are destroyed two years after the date on the consent form unless further consent is agreed.

Consent

5. The informed, oral consent of the child and parent/guardian should always be obtained before a photograph or image of a child is taken and used, and its intended and/or possible use(s) explained. The implications of using images, including risks and possible negative consequences, especially where images used on websites should also be fully explained. Child-friendly consent forms should be used for obtaining consent from children and, where possible, the child and family should be shown the image before it is published.

6. Group photographs: as with individual photographs, it should be explained to the group what the photographs will be used for and consent sought from individuals in the group. Any individuals who wish to opt out should be allowed to do so.

7. General photographs: where using images of children in crowd scenes where it may be difficult or impossible to get consents, the following should be taken into consideration:

- Would the children attending the event expect photographs to be taken?
- Would children in the photograph probably consider themselves to be in a public place, with no expectation of privacy?
- Is it unlikely that anyone would object to the photograph being taken? (An individual could be in a public place but may not want any images of them being used.) Where photographs are being taken at a planned event, as far as possible individuals should be told in advance that cameras will be used and how the photos will be used, in order that they can opt out of the event or notify organizers that they do not wish to be featured in any photographs.