



Child Safeguarding Policy

METAdrasi - Action for Migration and Development

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1. Introduction

METAdrasi - Action for Migration and Development is a non-profit organization founded in 2009 with a mission to protect the fundamental human rights of all those displaced and persecuted, with the belief that migration leads to development. Within the scope of its mission, it plans, manages, and implements innovative actions that address critical gaps in the reception and integration of refugees, migrants, and unaccompanied minors in Greece.

Adhering to the core principles of respect for national and international human rights, consistency, effectiveness, transparency, and adaptability to emerging needs, METAdrasi operates in the following areas: a) Providing interpretation services, b) Protection of unaccompanied minors, c) Protection of vulnerable groups, d) Education and integration of refugees and migrants.

Since 2010, METAdrasi has been implementing innovative actions to protect unaccompanied minors, aiming to ensure their safe passage, protect their rights, provide alternative care, secure their safe accommodation, facilitate their integration and ensure their access to education. Among the actions for the protection of unaccompanied minors are Safe Accompaniments from unsafe conditions to appropriate facilities, the Guardianship Network, Foster Care, Accommodation Facilities for Unaccompanied Minors, and Supported Independent Living for unaccompanied minors.

The Organization's actions are governed by the principles of the United Nations Convention on the Rights of the Child as ratified by Law 2101/1992 (Government Gazette A' 192), the European Convention on Human Rights (ECHR) as ratified by Law 53/1974 (Government Gazette A' 256) and the Charter of Fundamental Rights of the European Union. Specifically:

- a) The best interests of the child,
- b) Confidentiality and respect for private life,
- c) Participation of minors in decision-making through consultation and free expression of their views on any matter concerning them,
- d) Respect for dignity,
- e) Prohibition of discrimination,
- f) Preservation of family unity.

METAdrasi implements a Child Safeguarding Policy, which is summarized as follows: a commitment to protect and safeguard the rights of children, prevent and promptly address incidents of abuse or neglect, and adopt a policy of zero tolerance towards any form of endangerment and mistreatment of children.

2. Purpose and Scope of Application

The purpose of this Child Safeguarding Policy (CSP) is to define the framework and procedures that will ensure the protection and best interests of children and prevent the risk of their exposure to any form of abuse.

All personnel of the Organization, as well as any other natural or legal entity (volunteers, trainees, collaborators, suppliers, implementing partner organizations, visitors, etc.) associated with METAdrasi, are required to sign and commit to abide by this Child Safeguarding Policy.

The Child Safeguarding Policy focuses on the safety of children during working hours. However, the aforementioned individuals must adhere to this Child Safeguarding Policy outside of working hours as well.

All the aforementioned individuals are required to sign a Declaration of Acceptance and Compliance with the Child Safeguarding Policy of METAdrasi (see Appendix).

3. Definitions

Child Protection: It refers to the protection of children from violence, abuse, neglect, abandonment, and exploitation, both within and outside the family environment. It also involves promoting and ensuring their rights, as established by the Constitution, the Charter of Fundamental Rights of the European Union, the International Convention on the Rights of the Child, which was ratified by Law 2101/1992 (Government Gazette A' 192), and the International Covenant on Civil and Political Rights, which was ratified by Law 2462/1997 (Government Gazette A' 25).

Child: A child is defined as any person under the age of 18 years (according to the definition of the United Nations Convention on the Rights of the Child), regardless of whether the laws of a country recognize adulthood at an earlier age. For the purposes of this policy, the terms "child" and "minor" are synonymous.

Unaccompanied Minor: An unaccompanied minor is a child who arrives in Greece without being accompanied by a person exercising, according to Greek law, parental care or guardianship, or without being accompanied by an adult relative who is acting as a caregiver, and for as long as the performance of these duties has not been assigned to another person by law. This definition also includes a minor who ceases to be accompanied after entering Greece.

Child Abuse: It includes all forms of physical or emotional mistreatment, sexual abuse, neglect, negligent therapeutic treatment, or exploitation for commercial or other purposes.

-Physical Abuse: Actual or potential physical harm caused by another person, adult, or minor. It may involve hitting, shaking, poisoning, suffocating, and burning. Physical harm may also occur when a parent or caregiver fabricates symptoms of illness or deliberately induces illness in a child.

-Psychological/Emotional Abuse: The persistent psychological or emotional mistreatment of a child, causing serious and lasting effects on their emotional development. It includes conveying beliefs to children that they are worthless and unworthy of love, inadequate, or valued only if they meet the needs of another person, as well as age or developmentally inappropriate expectations imposed on children. It also includes situations where children may feel fearful or at risk of exploitation or corruption. Some level of emotional abuse is involved in all types of child abuse, although it can also occur independently.

-Bullying: Deliberate and usually repeated behavior that is harmful for a period of time, making it difficult for victims to defend themselves. It can take many forms, but the three main types are physical harm (e.g., hitting, stealing), verbal (e.g., racist or homophobic remarks, threats, name-calling), and emotional (e.g., exclusion from a group).

-Sexual Abuse: Forcing or enticing a child to engage in sexual activities they may not fully understand or give consent to. It may include, among others, rape, oral sex, penetrative or non-penetrative acts such as masturbation, kissing, rubbing, and touching. It may also involve children seeing or producing sexual images, witnessing sexual activities, and encouraging children to behave in sexually inappropriate ways.

-Neglect: The persistent failure to meet the basic physical and/or psychological needs of the child, which may lead to serious harm to their physical or mental development.

-Commercial Exploitation: The exploitation of a child for labor or other activities for the benefit of third parties, resulting in the child's physical or mental health, education, and moral or social-emotional development being harmed.

Direct Contact with Children: Physical contact and face-to-face communication with children. The duration of physical contact between personnel and children does not factor in the conclusion whether direct contact has been established.

Indirect Contact with Children: Personnel's access to various information and personal data, such as case studies, names, addresses, photographs, family environment, religious habits, and beliefs.

4. Special Code of Ethics and Conduct for Individuals Coming into Contact with Minors

As a person associated with METAdrasi and responsible for adhering to this Child Safeguarding Policy, I commit, in addition to complying with the METAdrasi Code of Ethics, to observe the following Special Rules of Ethics and Conduct:

I. I will behave with respect towards children, without discrimination based on race, color, gender, language, religion, political beliefs, or other opinions, national, ethnic, or social origin, property, physical or mental health status, disability, birth, or any other status.

I will respect the privacy and freedom of expression of children, provided that the rights of other children are not violated. I will not discriminate against or cause shame or humiliation to children. This includes anything that may be considered emotional abuse (e.g., using language that abuses a child emotionally or telling a story/image that could be used by a child or another adult in the future for emotional manipulation of the child, such as bullying or ridicule). I will not provoke, harass, or belittle children, and I will not display disrespect for cultural issues and practices of children. I will not directly or indirectly mention, indicate, or impose my own ideologies, worldviews, political, or religious beliefs, but I will always express myself with respect for the particularities (national, class origin, sexual preferences, etc.) of the children. I will not abuse the power and authority I have due to my position in a way that affects the physical and mental integrity of the children. I will ensure that my appearance is not provocative in any sense, both towards colleagues and children. I will not address children in any other way than by using their official names.

II. I will promptly inform the authorities of any incidents of child maltreatment that come to my attention.

I will not withhold information concerning violations of the Policy. Therefore, I will report any violations of the Policy by others immediately. In case of non-reporting or concealment, I understand that I will be considered complicit for the purposes of this Policy. I will immediately disclose all charges, convictions, and other outcomes of a crime that occurred before or during my association with METAdrasi, related to the exploitation and abuse of children.

III. I will ensure to strengthen and safeguard the best interests of children. I commit to maintaining the confidentiality of personal data and any information that could "photograph" and expose children to the risk of identity recognition.

I will contribute to adequately preparing children for their roles as active and responsible citizens through play, sports, participation in groups, assigning responsibilities, and more. I will provide and ensure quality medical care, equal opportunities, access to all types of education, and professional guidance for children. I will ensure that children live in an environment of stability and family atmosphere. I will not abuse, neglect, or intimidate children. I will not use language or adopt behavior towards children that may be careless, abusive, exploitative, have sexual implications, be demeaning, and/or inappropriate. I will not use physical or any other form of violence against children. I will not behave in a way that could have a negative impact and undermine the trust or self-esteem of the child. I will not leave volunteers or students doing their practice alone with a child in a private or unsupervised space. Physical restraint should be the last resort and should only be used when there is an increased risk of self-harm or harm to others, and in no case

should it be used as a form of physical punishment. Restraint should be of short duration to control the individual and regain self-control. The method of restraint should be socially acceptable, and the process should control behavior without causing physical harm to either party. I will make every possible effort and use every lawful means to minimize the exposure of children to any risk. I will not use a child as an interpreter in official procedures (such as interviews, social history assessments, etc.). I will not exploit a child for labor (e.g., domestic work). I will not grant or encourage others to give money directly to the children. I will not give or accept valuable gifts/money from the children, except when the gifts are provided by the organization as part of a planned activity. I will not seek or accept, in any way, reimbursement from the children for the services I provide to them. I am not allowed to get involved in exploitative relationships – sexual, financial, or employment-related – with the children.

IV. I will ensure the participation of children in decisions that concern them.

I will respect the right of children to be heard and participate in the processes and decisions that concern them. I will inform, encourage, and empower them to advocate for and implement their rights. I will consider their right to participate in decision-making processes that concern them and their living conditions, considering their age and maturity. I will encourage and empower children to be open to speaking about issues that concern them.

V. If it is in their best interest, I will strengthen the child's relationship with their family.

I will support regular communication between children living away from their families and significant individuals in their lives. This communication may only be restricted or prohibited when it is deemed in the child's best interest. I will ensure the right of siblings to stay together, and in cases where it is determined not to be in their best interest, they have the right to maintain close contact with each other.

VI. I will ensure the safety of children and create a climate of protection.

I will not share a room with a child overnight. I will not engage in activities that are not appropriate for my role and responsibilities. I will not ignore sexually provocative games among the children. In such cases, I should take measures and actions to prevent such behavior. I will not conceal or avoid acting in cases of inappropriate behavior by the child. In such cases, I must act accordingly to put an end to such behavior and not encourage similar conduct. I will not allow unknown individuals to enter places where activities with children take place (e.g., facilities, classrooms, secure areas, etc.). I will ensure that daily attendance records or visitor registers are kept for all certified individuals, including staff, parents, siblings, guardians, etc. I will ensure that another adult is present when I work with/near children, whenever possible. I will not invite unsupervised children to my home. I will comply with the relevant national legislation, including laws regarding child labor. I will not use offensive language or respond to inappropriate behavior/language, and I will not use punishment or abusive behavior, except in cases where consequences are imposed within the framework of child protection and only by the authorized personnel. I will not engage in disrespectful behavior (e.g., using disrespectful language or inappropriate behavior towards others), and I will not work under the influence of drugs or alcohol. It should be noted that the workers should behave with modesty and dignity and serve as examples of behavior for the children. I will not invite, accompany, or transport children to any location, except for organized activities by the Organization, without the consent of the Child Safeguarding Officer.

VII. I will not engage in romantic/sexual relationships with children, including sexual encounters for payment.

I will not participate in any form of sexual relationship with children. I will not hug, kiss, touch, or engage in any physical contact with children, taking into consideration anything the child deems inappropriate

based on their cultural, national, religious background, and gender. I will not use language or make statements in an inappropriate manner towards any beneficiaries, regardless of age, gender, or any other characteristic. I will not view pornographic material involving children. It is prohibited to watch, publish, produce, or distribute pornographic material that involves children, and/or exhibit any pornographic material to children at any time, whether during work hours or outside of them.

VIII. I will not create or distribute audiovisual material depicting child abuse. I will not use computers, mobile phones, videos, digital cameras, or any other technological media in ways that are inappropriate, exploitative, or psychologically abusive towards children.

I will ensure that children, legal guardians, or authorized representative have been properly informed and have signed the consent form before taking photos, videos, or any other related derivatives. I will ensure that photos, films, videos, and DVDs present children with dignity and respect and not in a vulnerable or submissive position. Children must be adequately clothed and not posed in a way that could be seen as sexually suggestive. I will ensure that images are honest representations of the environment and events. I will ensure that file labels, metadata, or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form. I will not engage in any publication that refers to METAdrasi or any element or information related to its actions involving children without prior written approval from the Communication and Public Relations Department of METAdrasi. In the event that I am asked by a representative of any mass media to express an opinion or provide information directly or indirectly related to METAdrasi and the implementation of any of its actions concerning children, I must seek prior written approval from the Child Safeguarding Officer and the Communication and Public Relations Department of METAdrasi. I will not develop personal relationships with children (including social networks) or with any person who was a beneficiary until their departure from the Organization. The connection of the beneficiary with the social media account of the Accommodation Facilities/ Foster family is allowed. I will not exchange personal information (phone numbers, social media, etc.) with children. I will not disclose children's contact details. I will not publish photos of children beyond those used by the publicity department. I will not display the faces of children in presentations or publications, and I will not publish stories or images that could endanger the child, their family, or the community or stigmatize the child. I will not use any information or image of children without the written consent of the Child Safeguarding Officer or their legal guardian, considering the wishes and opinions of the children, and I will not force them into any form of public exposure.

5. Compliance and Dissemination of Child Safeguarding Policy (CSP)

- i. All individuals mentioned in Article 2 are responsible for adhering to this Child Safeguarding Policy (CSP).
- ii. The CSP is posted on the website of METAdrasi (<https://metadrasi.org>). It is also available on the organization's internal database (CRM) under the category "Regulations/Policies," accessible to all personnel of the organization. When required, it will be sent via email.
- iii. The Departments of Human Resources, Volunteers, Interpreters & Translators Management are responsible for ensuring that all staff (administrative and interpreters, associates), trainees, and volunteers sign the Declaration of Compliance and Acceptance of METAdrasi's CSP. All signed Declarations of Compliance and Acceptance are archived in a separate folder in the HR Department.
- iv. In cases where METAdrasi plays the role of coordinator in a partnership, the implementing partners commit to sign and adhere to METAdrasi 's Child Safeguarding Policy. The Program Management Department, in collaboration with the Child Safeguarding Officer, is responsible for verifying that the minimum child protection requirements are met by the partners.

v. The Heads of Sectors and Departments, as well as Project Managers and/or Team Coordinators, ensure that the personnel/teams under their supervision: a) comply with the Specific Code of Ethics and Conduct included in the CSP and b) understand how to report incidents of child abuse.

6. Child Protection Referral Person/ Child Safeguarding Officer

By decision of the Board of Directors, a Child Protection Referral Person /Child Safeguarding Officer is appointed, with the following main responsibilities:

- Monitoring the implementation of the Child Safeguarding Policy (CSP) and preparing related reports, ensuring and supervising that departments are fulfilling their responsibilities regarding CSP implementation.
- Developing a plan for regular evaluation of CSP implementation processes and submitting proposals for improvement.
- Organizing or overseeing training on child protection matters and developing relevant tools.
- Informing minors about the CSP in a language they understand.
- Ensuring correct and uniform procedures for handling incidents and ensuring that preventive measures taken during activities (e.g., venue selection, screening of participants, informing and obtaining consent from minors for their participation, terms for capturing/publishing photos, interviews, videos) are appropriate for children.
- Creating action protocols for the management of potential cases of abuse or violence, involving minors or adults (staff members or non-staff). The protocols include the reporting process to the competent authorities, protection measures for the child victim and other children, the alleged offender's investigation by the relevant authorities, and actions to support the child victim.
- Receiving and investigating reports falling under the CSP and preparing reports with relevant findings/proposals.

The Responsible for Child Safeguarding is bound by the obligation of confidentiality while performing their duties.

7. Procedures for Prevention and Compliance with the CSP

7.1 Recruitment Process - Criteria, Checks

METAdrasi complies with safe and fair hiring standards. The responsibility for child protection will be included in all job descriptions. During the recruitment process, the following steps are taken:

- i. Within the text of the open expression of interest, a clear statement is included regarding METAdrasi's commitment to child protection, which is present in all job vacancies published. An indicative phrasing follows: "The hiring processes reflect METAdrasi's commitment to keeping children safe. Employment at METAdrasi requires compliance with METAdrasi's Child Safeguarding Policy."
- ii. Additionally, the level of child safeguarding for each position is included, based on the following classification:
 - **Child Safeguarding Policy: Level 1** - direct and frequent contact with children
 - **Child Safeguarding Policy: Level 2** - sporadic contact with children
 - **Child Safeguarding Policy: Level 3** - rare contact with children
 - **Child Safeguarding Policy: Level 4** - limited to minimal contact with children
 - **Child Safeguarding Policy: Level 5** - no contact with children.

Level 1 corresponds to employees who are present in the field and have regular contact with beneficiaries. All employees involved in providing services to beneficiaries are classified as Level 1 personnel.

Level 2 corresponds to office employees who may have sporadic or occasional contact with children as part of their duties. Indicatively, contact with children may occur through monitoring and evaluation visits, needs mapping and assessment, interviews, and content development for communication. Senior administrative staff are also classified under Level 2 as they may conduct ad hoc field visits in their supervisory role.

Level 3 corresponds to Organization employees who do not have a presence in the field or have limited presence in the field, thus their scope of work does not involve direct contact with children.

Level 4 corresponds to office employees of the Organization who do not have a presence in the field or have limited presence in the field, thus their scope of work does not involve contact with children.

Level 5 corresponds to office employees of the Organization who do not have a presence in the field, and therefore, their scope of work does not involve direct contact with children.

iii. For positions classified under Levels 1 and 2, specific questions regarding child protection will be asked to candidates during the interview stage. These questions aim to better understand the candidate's ability to identify and manage risks related to children.

iv. Selected candidates for employment are required, before signing the contract, to submit a) a copy of their criminal record and b) a declaration of non-conviction (as a necessary prerequisite for the completion of the employment process and for registration in the "Registry of Members of Greek and foreign NGOs active in international protection, migration, and social integration within the Greek territory") and c) a declaration stating: " Being well aware of METAdrasi's Policy for preventing and responding to sexual exploitation, abuse and harassment and METAdrasi's Child Safeguarding Policy a) I have never been involved as a perpetrator in an incident that could be perceived as a case of sexual harassment, abuse or exploitation b) I have never been involved as a perpetrator in any incident involving any form of child abuse (person below 18 yo) and c) I consent that, in case it is deemed important, METAdrasi can contact my former employees on the above."

In the event of a conviction that raises concerns about the safety of children (such as sexual abuse, pedophilia, trafficking of drugs, inflicting physical harm), this constitutes a valid reason for the organization to withdraw the employment offer.

v. Personnel sign and commit to a) the Code of Ethics of METAdrasi, complemented by this CSP and the Specific Rules of Ethics and Conduct included therein.

7.2 Volunteer Selection Criteria

Volunteer positions/vacancies are correspondingly characterized by the level of child protection required for the job positions, as described above. During the volunteer selection process, specific questions regarding child protection will be asked during the interview stage. Additionally, before signing the contract, volunteers are required to submit a) a copy of their criminal record and b) a declaration of non-conviction (as a necessary prerequisite for the completion of the selection process and for registration in the "Registry of Members of Greek and foreign NGOs active in international protection, migration, and social integration within the Greek territory").

7.3 Training

All personnel mentioned in Article 2 who are committed to adhering to the CSP will receive regular training related to child protection, appropriate for their roles and responsibilities, starting from the induction stage. This training will include an understanding of the incident reporting mechanism. All staff members will undergo introductory training on the Child Safeguarding Policy, and continuous training will be provided throughout their tenure. Records of seminar presentations and attendance lists will be maintained in the Human Resources Department. The training needs of the personnel will be assessed regularly. Collaborators, children, and families will also receive information, education, and training on child protection.

7.4 Risk Assessment

METAdrasi is committed to ensuring that its programs and actions operate in the best interest of children. Every potential risk of harm to children will be considered in METAdrasi's programs and actions at all stages, from initial program planning to implementation, completion, and evaluation. Risk assessments will be conducted for all activities, programs, and actions, and strategies to mitigate risks will be developed. These strategies will minimize the risk to children and will be integrated into the implementation of the actions.

7.5 Other Preventive Measures

The personnel of METAdrasi, who often work in the field, are not always under the most suitable conditions. In this context, the locations and/or facilities chosen for activity implementation must be carefully evaluated to avoid exposing children to risks and ideally, should be child-friendly or able to be adapted as such. METAdrasi should encourage the selection of spaces without obstacles that could cause physical harm (e.g., debris, environmental hazards) and should protect children from risks such as direct access to highways, poorly lit areas, or areas with low visibility due to natural elements, etc. In cases where relevant risks are identified, mitigation measures should be implemented (e.g., appropriate and child-friendly signage, barriers to access dangerous areas). If identified risks are numerous or cannot be reduced to an acceptable level, METAdrasi should weigh the anticipated benefits for beneficiaries, including children, against the risks and, if necessary, may decide not to proceed with the respective activities.

All planned and implemented activities must be safe and appropriate for the age and maturity level of the children involved. For any activity involving children, the need for written consent from the parent, legal guardian, or trustee before the child's participation is examined. The consent form should be provided in a language understood by the parent/guardian/trustee, explaining the activity in which the child is invited to participate, including the time and place of the activity.

When conducting activities with children, the two-adult rule should be followed whenever possible, meaning there should be at least two adults present in the vicinity of the children. In cases where the nature of the activity does not require or facilitate the presence of two adults (e.g., educational activity in a classroom, individual session with a psychologist, individual escort to a public service), other precautionary measures should be taken to ensure the child's safety. Such measures may include providing services in designated workspaces and within working hours, having other adults nearby, conducting the activity with an open door, or using company or public transportation.

If transportation of a child is necessary for service provision, the child should be accompanied by a parent/legal guardian or trustee. Exceptionally, and always with the consent of the guardian/trustee as described above, a child may participate in activities accompanied by METAdrasi personnel (e.g., educational trips). Child transportation should always occur using a METAdrasi vehicle, a rented vehicle

suitable for the specific purpose, or public transportation. When using company vehicles, all appropriate safety measures, especially those for child protection provided by the Traffic Code, should be adhered to, and the personnel driving the vehicle are bound by the Code. METAdrasi staff is not allowed to transport beneficiaries' children using their own means of transportation. Situations of emergency or life-threatening circumstances constitute justified exceptions, provided no other alternative is available.

Any service provision and/or activity providing Internet access should not expose children to risks of harm and abuse, such as sexual abuse through electronic means or exposure to pornography. Access to inappropriate content for the child's age should be prevented by installing electronic protective filters. The computer equipment accessible to children should be placed in a shared space, always supervised by METAdrasi personnel.

The practical procedures and preventive measures related to child protection will be subject to regular monitoring and evaluation to ensure their suitability and effectiveness.

8. Violations and Reporting

METAdrasi takes any violation of the Child Safeguarding Policy, as well as any violation of children's rights in general, very seriously. All concerns and reports, regardless of the source, are treated with seriousness. Anyone who raises a concern or reports a related incident is treated with respect and discretion. It is emphasized that reports concerning child protection are prioritized and treated with utmost seriousness due to their special nature and the inherent high vulnerability of children.

Those involved in METAdrasi's programs and activities are obligated to immediately inform the Child Safeguarding Officer (CSO) of METAdrasi (cpreport@metadrasi.org) in writing if they become aware of or receive information about any violation of the Child Safeguarding Policy by anyone coming into contact with children. Additionally, staff must inform the Human Resources Department about criminal convictions or any other changes or actions in the penal code related to child abuse.

8.1. Reporting Procedure and Monitoring

Written reports concerning Child Protection issues or incidents of child abuse are submitted through METAdrasi's reporting mechanism, specifically:

- Incident Reporting Form for Inappropriate Behavior, Mismanagement, and Fraud (E01/SOP15), which is posted on the Organization's website at <https://metadrasi.org/contact-us/>.
- Reporting/complaint boxes placed at various points within the offices and facilities of the Organization.
- Completion and submission of the Critical Incident Report (CIR) Form (E03/SOP15).
- Sending an email to cpreport@metadrasi.org.
- Verbal reporting to the Child Safeguarding Officer.

The management of reports, as well as all other potential complaints and grievances, is elaborated in detail in METAdrasi's Procedure of Reception, Management and Investigation of Reports (SOP15). Decisions regarding incidents of child abuse are not taken individually by METAdrasi's staff and volunteers. However, they are obliged to protect children at risk and inform METAdrasi immediately.

8.2. Confidentiality - Data Protection

Reports can also be submitted anonymously. Information regarding individuals involved will only be disclosed to necessary personnel and will not be further shared without the consent of those involved,

unless someone's life is in danger or a minor is at risk, or when required by law. Non-identifying information is shared as required by the reporting procedure.

Personnel involved in the reporting mechanism and the receipt/management of related reports are bound by strict confidentiality, which continues even after the termination of their employment. This obligation applies to all involved parties who have access to sensitive information in the reports, including those with access to the report files or database. Personnel participating in the reporting process are informed about the importance of maintaining confidentiality and sign a confidentiality agreement before performing their duties. Failure to maintain confidentiality will have consequences and may result in actions taken by METAdrasi in accordance with Articles 26 and 27 of the Employment Regulation, with the possibility of exercising any legal means when the violation constitutes a breach of legislative provisions and obligations. Where physical files are kept, documents must be securely stored to avoid accidental disclosures.

9. Sanctions - Consequences

1. Violation of this Child Safeguarding Policy, in addition to disciplinary sanctions provided for in Articles 25 and 26 of the Employment Regulation, may lead to termination of cooperation with METAdrasi.
2. In case of deliberate concealment, falsification, or alteration of information related to a submitted complaint, a disciplinary investigation will be conducted (for personnel), or the cooperation agreement may be terminated for cause (for external collaborators).

Appendix



**DECLARATION OF ACCEPTANCE-COMPLIANCE
WITH METADRASI'S CHILD SAFEGUARDING POLICY**

I declare that I have read, understood, and agreed to comply with METAdrasi's Child Safeguarding Policy.

I understand that as an individual associated with METAdrasi, I am responsible for using common sense and avoiding actions or behaviors that could be perceived as exploitation and abuse of children.

I understand that any violation or non-compliance with any of the above rules may result in disciplinary action against me or termination of my contract.

Full Name:

Location:

Date:

Signature: