

Starfish Safeguarding Policy

Safeguarding Vision Statement

The Starfish Foundation is committed to the welfare of our beneficiaries, volunteers, and staff.

Our Safeguarding policy reflects this commitment by incorporating guidelines and procedures that are designed to guarantee the safety of children and vulnerable adults who come into contact with Starfish as well as the safety of our personnel - including staff, part time workers, and volunteers - and all other parties with which Starfish has a contractual relationship.

Safeguarding is ensuring a safe and secure environment for the beneficiaries of our programmes and activities as well as for our personnel. Safeguarding at Starfish involves personnel actively preventing harm, harassment, abuse and neglect. Personnel should be able to identify abuse and misconduct and to orientate the person affected, the person reporting, and potential witnesses.

Starfish aims to enable our personnel to be prepared to respond safely and efficiently if a concern arises. Our policy details the mechanisms in place to deal with safeguarding issues. This includes training for personnel, reporting structure, and support structures for our beneficiaries. Through this policy, we aim to protect and support all of the people involved with Starfish.

Definitions

Asylum Seeker - An Asylum-Seeker is a person who has left their country and is seeking protection from persecution and serious human rights violations in another country, but who hasn't yet been legally recognized as a refugee and is waiting to receive a decision on their asylum claim.

Beneficiaries - Any person whom we support. In our daily work, we do not use this terminology, preferring instead to talk about people, some of whom are on the move, displaced or in transit. For the purpose of this policy, we define a beneficiary as a person or group of people eligible to benefit from charitable services.

Adult at risk - Any person aged 18 or over who is or may be in need of care and support, (e.g., health, personal or social care), is experiencing or is at risk of abuse or neglect and as a result of this is unable to protect themselves from either the risk or experience of neglect

or abuse.

Child - any person under the age of 18 (United Nations Convention on the Rights of the Child). This may not always be possible to verify. It is often difficult to know the true age of a person within the context in which we work. There are times when adults can present themselves as a minor and instances when minors present as adults. People who present as minors will be accepted as such until information about their true age is established.

Child Abuse - A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or by others. Abuse can take place online, either wholly, or by its use to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Safeguarding Adults – Safeguarding means protecting an adult’s right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances. There may be instances whereby the risk is so high that referrals for support need to be made without an adult’s consent.

Safeguarding Children - means protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

Personnel - includes all Starfish employees, part time workers, volunteers and interns.

Refugee - A refugee is a person who has fled their own country because they are at risk of serious human rights violations and persecution there. The risks to their safety and life were so great that they felt they had no choice but to leave and seek safety outside their country because their own government cannot or will not protect them from those dangers. Refugees have a right to international protection. Another term for refugee is displaced person.

**Definitions adapted from Choose Love Safeguarding Policy - January 2021.*

Scope of the Safeguarding Policy

This safeguarding policy applies to everyone working on behalf of Starfish, including all personnel, the board of trustees, and beneficiaries. In the case that a partner organisation or

contractor does not have a safeguarding policy and an incident occurs at OpenSpace or during a Starfish activity, Starfish's safeguarding policy shall apply.

Starfish may rent out space to other organizations to organize activities animated or facilitated by their staff, volunteers or even sub-contractors. To protect children, adults-at-risk and the reputation of the Starfish Foundation, it is important that, where appropriate, any such rental contracts / terms of engagement reflect the need for these organizations and their personnel to be aware of and to follow Starfish's safeguarding policy and procedures; this includes ensuring that they are made aware of our Code of Conduct and the process for reporting concerns to one of the Safeguarding Team or an appropriate manager.

The responsibility for employees and volunteers of such partner organizations, and their subcontractors remains with the main contractor who must ensure that they are informed about their responsibility to report any concerns directly to them in the first instance and to an identified Starfish Safeguarding Officer in line with this policy and procedure.

Roles and Responsibilities

The Starfish Safeguarding Team is composed of the senior personnel, including but not limited to the Director and Senior Administrator. The Safeguarding Team is responsible for:

- Regularly reviewing and updating Starfish Foundation's Safeguarding Policy & Procedures.
- Promoting the importance of safeguarding across the organization and ensuring mechanisms are in place to communicate and raise awareness about safeguarding issues
- Managing allegations or concerns about abuse, ensuring incidents are dealt with and reported appropriately
- Ensuring records of any concerns reported are maintained and stored securely
- Collecting safeguarding monitoring data and providing reports and monitoring information to the Board on a quarterly basis

The senior personnel can be contacted about any safeguarding queries at: melinda@asterias-starfish.org and office@asterias-starfish.org.

The Starfish Foundation Board:

- Receives quarterly reports from the Safeguarding Team about safeguarding across the organisation.
- One Board member (the Legal Representative) has responsibility and oversight for safeguarding and will have an important role in ensuring the Board pays due regard to safeguarding issues. She can be contacted at: kliag@yahoo.co.uk.

Prevention Measures

Recruitment

Starfish is committed to the safe recruitment, selection, and vetting of new personnel. Each potential new staff member or volunteer must submit an official criminal background check in accordance with local regulations. Applicants must also submit two to three professional references. Starfish will verify information in the applicant's CV and check their references before hiring.

Code of Conduct

The Starfish Code of Conduct details the requirements for all personnel to ensure a safe and mutually respectful working environment. All personnel must read and sign the Code of Conduct prior to beginning any work with Starfish and are expected to adhere to its values and standards. Violations of the Code of Conduct are grounds for disciplinary action, up to and including dismissal.

Starfish Code of Conduct:

As a Starfish volunteer, I _____ **commit to:**

- Work positively, constructively and with humanity to support refugees and asylum seekers and colleagues to implement Starfish programs and fulfil its objectives
- Ask for help and support if I need it and solve problems positively
- Act ethically and within Greek and international law
- Consider people's diverse backgrounds when communicating, supporting, developing and delivering Starfish services as well as avoiding culturally inappropriate behaviour
 - This includes dressing appropriately when working in the camp or with persons of concern. Shoulders should be covered, and tight clothing should not be worn.
- Act with integrity, compassion, honesty and equality and abstain from any actions that would harm beneficiaries, or damage Starfish's reputation
- Show equal respect to all without distinction or discrimination based on nationality, race, gender, religious beliefs, sexual orientation, disability, age, class or political opinions
- Abstain from any behaviour or act that could be considered abusive, harmful, discriminatory, harassing or exploitative
- Understand that I am in a position of power relative to beneficiaries whose well-being may depend on the assistance Starfish and other organizations provide. Even seemingly consensual or non-exploitative relationships can do harm or be perceived by others in the refugee and humanitarian community, or the general public, as an abuse of power and trust or creating conflicts of interest.

- o I will not abuse the power, privilege and influence I have by virtue of my position over the lives and well-being of beneficiaries.
- o I will not request any service or favour from beneficiaries in exchange for assistance.
- o I will not engage in any relationship - sexual, emotional, or financial, either in person or online – with beneficiaries. If a situation arises that is unclear, it is the volunteer/employee’s responsibility to seek supervision to resolve the issue.
- Report any disrespectful, discriminatory, abusive, or exploitative behaviour or concerns about other personnel.
- Work within a culture of ‘Informed Consent’. All photos, reports, or media representing volunteers or beneficiaries should be taken and used **only with informed consent** – and when the use and distribution of the photos is understood clearly by all (See Annex 2)
- Conduct media interviews as a Starfish volunteer only with permission of the Director or Trustees of Starfish
- Respect the confidentiality of beneficiaries, Starfish, and co-volunteers by not sharing personal details, internal communications, or individual experiences, accounts or stories without the clear permission of the people involved
- Act within Health and Safety Guidelines

I also confirm that I:

Have no criminal record of violent offences, fraud, offences against children or offences relating to hate speech, discrimination, trafficking or other criminal convictions relating to the harm of an individual or community.

I understand that a formal grievance can be raised for any allegation of bullying or any form of discrimination, use of drugs or alcohol on shift, sexual harassment or violence, or any other serious breach of the Code of Conduct. All parties involved will immediately take a leave of absence from Starfish while investigations take place. This is non-negotiable and is part of the contract every individual makes when volunteering or work with Starfish.

Consequently, an investigation undertaken by Starfish management, consisting of a discussion with the subject of the grievance as well as with any other witnesses to the alleged offence. Access to relevant emails or text messages may be requested if necessary. Notes and/or an electronic copy will be made of all interviews undertaken. If the allegation involves more than one member of the team, or a member of the Starfish management, an independent investigation will be undertaken by a mediator.

A panel of three long-term Starfish members will discuss the findings and may ask the people involved further questions. The panel will aim to come to a conclusion within five days, which will be delivered orally and in writing. Conclusions can consist of no case to answer, formal warnings, suspension and dismissal. All decisions are final.

Signature

Date

Communication, Awareness Raising & Training

Starfish commits to training all personnel to adopt best practices to safeguard and protect all beneficiaries, especially children and vulnerable groups, against abuse, and themselves against allegations being made against them.

In order to do this, Starfish ensures that during onboarding all personnel are made aware of the Safeguarding Policy and its annexes. In addition, all personnel must read and sign the Code of Conduct prior to beginning any work with the organization.

Starfish commits to holding biannual awareness raising/training sessions on safeguarding best practices for all personnel. Starfish also commits to reviewing the Safeguarding Policy on an annual basis to assess effectiveness and make any necessary changes.

Health and Safety Guidance

The health and safety of all personnel is vitally important to the Starfish Foundation. The following are general guidelines for personnel that will help to ensure this. Any queries about these guidelines should be directed to the relevant project manager or the Director.

- Inform Starfish of any long term medical problems or mental health issues that may impact your work before joining us.
- Always wear sensible footwear in the camp to avoid trips and falls.
- When working in the camp, please dress accordingly for the weather – bear in mind that in winter time it gets quite cold at night.
- It is mandatory to report any damages or accidents on shift. Volunteers must also inform the relevant project manager or Director of any incident that occurs even during private leisure time because it may compromise their affiliation with Starfish.
- Please stay updated on our fire and evacuation plans in the camp and office (Annex 4).
- Do not use any construction equipment or tools that you are not trained to operate.
- Be aware that although rarely seen, there are venomous snakes on Lesvos. Please report any sightings immediately and inform medical teams if you have been bitten.
- Starfish provides first aid kits and will contact a medical professional to ensure the quick delivery of medical assistance in the case any is needed.
- Do not endanger yourself or others by being intoxicated or under the influence of any substance on shift.

- If you are concerned about your mental health, please speak to our volunteer coordinator or Director as we can arrange psychological support. Your wellbeing is of the utmost importance to us.
- Refrain from violence or aggressive actions which may lead to violence. If you find yourself involved in this type of scenario, you should remove yourself from the scene immediately.
- Do not engage in medical treatment on others, ie CPR, unless you are properly trained to do so.
- Smoking is not permitted indoors in any premises run by Starfish.
- In general it is the responsibility as a member of Starfish to inform us of any incident that directly impacts the safety and wellbeing of yourself and others during your time with us.

Response Measures

Identifying and Reporting Concerns

Starfish endeavors to treat everyone fairly and aims to provide a workplace free from bullying, harassment and violence.

The earlier sections of this policy describe how Starfish promotes an environment where beneficiaries and personnel are safe from harm and where their wellbeing is upheld.

This section describes how any serious incidents will be managed. Recognizing that situations of harm often develop gradually, through the regular awareness raising, training and monitoring, Starfish will monitor the safeguarding environment and try to prevent any serious incidents from occurring.

Below is a non-exhaustive list of incidents that this Safeguarding Policy aims to address:

- Allegations of criminal activity involving beneficiaries committed by personnel;
- A romantic or sexual relationship formed between a personnel member and a beneficiary/community volunteer;
- A disclosure of sexual abuse or harassment between two personnel members or between a personnel member and a beneficiary;
- An allegation of bullying, or any form of discrimination;
- Use of drugs or alcohol on shift;
- Sexual harassment or violence;
- Any other serious breach of the Code of Conduct.

If a personnel member feels they have experienced or observed any of these incidents they must approach their direct manager or the Director to discuss the issue. They must follow up this conversation by filling out and emailing the form attached in Annex 1. The complaint will be reviewed in relation to this Safeguarding policy and the Code of Conduct.

Those who wish to make a formal grievance, shall inform their direct manager or the Director. If the grievance is filed against the field coordinator or the volunteer manager, the Director should be informed. If the grievance is filed against the Director, the complaint should go directly to the Board of Directors.

Investigation of Concerns

All parties involved will immediately take a leave of absence from Starfish while investigations take place. This is non-negotiable and is part of the contract every individual makes when working with Starfish. Consequently, an investigation undertaken by Starfish management, consisting of a discussion with the subject of the grievance as well as with any other witnesses to the alleged offence. Access to relevant emails or text messages may be requested if necessary. Notes and/or an electronic copy will be made of all interviews undertaken. If the allegation involves more than one member of the team, or a member of the Starfish management, an independent investigation will be undertaken by a mediator.

A panel of three long-term Starfish members (board members and/or permanent senior staff) will discuss the findings and may ask the people involved further questions. The panel will aim to come to a conclusion within five days, which will be delivered orally and in writing. Conclusions can consist of no case to answer, formal warnings, suspension and dismissal. All decisions are final.

If there are allegations of violence, sexual assault, or breach of local law, the person making the allegation will have our support in involving the police to resolve the matter, if that is what the person wishes, and also will have access to professional psychological support. Starfish cannot investigate serious crimes in lieu of the police and is not a legal body with the capacity to convict people against whom allegations are made.

Managing Safeguarding Incidents

All parties are bound by confidentiality and will not share information about grievances with outside parties except those persons who, at the discretion of long-term Starfish members, have a legitimate need to know.

Confidentiality & Record Keeping

Starfish is committed to working within a culture of 'Informed Consent'. All photos, reports, or media representing personnel or beneficiaries should be taken and used **only with informed consent** – and when the use and distribution of the photos is understood clearly by all. Informed consent must be provided by 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 must give consent on their behalf. See Annex 2 for more detailed guidance on informed consent.

All Starfish personnel must respect the confidentiality of beneficiaries, the Starfish Foundation, and all other personnel by not sharing personal details, internal communications, or individual experiences, accounts or stories without the clear permission of the people involved.

Referral Services

Please speak to Starfish management for information about accessing mental health, legal, or mandatory reporting services (i.e. police).

Annexes

Annex 1: Incident Report Form

Copies of our incident report forms can be easily accessed by emailing office@asterias-starfish.org. An example template is below.

Reporter's Details

Date and time	
Your name*	

*if you would prefer to remain anonymous, you can leave this blank

Details of Incident

Date/time of incident	
Location of incident	
Details of Incident	

Were/are there any other witnesses?*	
If yes, and the witness is happy to be contacted by Starfish, please give their contact details.	
Are there any other factors you would like us to take into account?	

*We ask this because witness accounts can help further investigation, however it is not required.

Preferred Next Steps

Would you feel comfortable for the safeguarding team at Starfish to contact you about this report in the future?*	
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*If the answer is yes, the safeguarding lead will come back to you as quickly as possible. If you would prefer to communicate with a specific person at Starfish please feel free to let us know.

Thank you very much for the time you have taken to complete this report.

Annex 2: Guidance on Informed Consent

(Adapted from the Inter Agency Child Protection Working Group, 2014. Inter Agency Guidelines for Case Management and Child Protection, http://www.cpcnetwork.org/wp-content/uploads/2014/08/CM_guidelines_ENG_.pdf)

What is informed consent?

Informed consent is the voluntary agreement of an individual who has the capacity to give consent, and who exercises free and informed choice. To ensure informed consent when taking

and using any photos, reports, or media the subjects must fully understand the information that will be collected and how it will be used, and confidentiality and its limits. Anyone taking or using such material is responsible for communicating in a manner that is understood by the subject and should encourage the subject to ask questions that will help them to make a decision about their participation.

Informed assent is the expressed willingness to participate in services. For younger children who are by nature or law too young to give informed consent, but old enough to understand and agree to participate as a subject of any photos, reports, or media, the child's "informed assent" is sought. Even for very young children (those under 5 years old) efforts should be made to explain in language appropriate to their age, what information is being sought, what it will be used for, and how it will be shared.

Those gathering information or getting permission for sensitive information or images to be shared must obtain informed consent from the child (and/ or their parent/ caregiver), preferably in written form. When children are too young (usually under 15 years) to consent, their informed assent should be sought (i.e. willingness to participate in services) while a parent or caregiver gives consent. The informed assent/ consent process must include explaining to the child (and their parent/ caregiver, where appropriate) exactly why they are gathering information, how it will be used and by whom. Information should be shared in language and formats appropriate to the child's age and capacity to understand, and the child (and parent/ caregiver) should be given opportunities to ask questions. In situations where mandatory reporting laws exist and are functioning, service providers must explain these limits on confidentiality when obtaining consent. Even with very young children (i.e. under 5 years old), efforts should be made to share and explain information in an appropriate format.

What should I get consent for?

Any photos, videos, written information, or other media in which the subject is identifiable.

Template informed consent form

**Adapted from Anti-Slavery International's child consent form,*

<http://www.antislavery.org/wp-content/uploads/2018/02/Anti-Slavery-Child-Safeguarding-Policy-2017.pdf>

Someone has explained to me that Starfish is an organization that provides support to people in need on Lesvos. Someone has explained to me **why** Starfish would like to use photos/video/information about me, **where** the image will be used and for **how long**.

I give/do not give Starfish permission for my photo/video/information to be used in:

- ✓ Annual reports
- ✓ On the website/social media
- ✓ Newsletters
- ✓ Other marketing material
- ✓ Other *[state where]*

For:

- ✓ A specified report/event/time *[state what]*
- ✓ One year
- ✓ Two years
- ✓ Five years.

I know I can change my mind at any time and ask them to stop and not use my photos or any information about me.

I know Starfish will keep my photo/video/interview safely and not reuse it without me saying that's ok.

Signed: _____

Date: _____

Parent/Caregiver Consent

If a parent/caregiver available to provide consent: Yes / No

Where a parent/caregiver is available to provide consent please complete the section below:

If no please provide an explanation:

I give/do not give permission for the above named child's photo/video/interview to be used in:

- ✓ Annual reports
- ✓ On the website/social media
- ✓ Newsletters
- ✓ Other marketing material
- ✓ Other *[state where]*

For:

- ✓ A specified report/event/time *[state what]*
- ✓ One year
- ✓ Two years
- ✓ Five years.

I understand that I can withdraw permission at any time.

I understand that the images/videos/interview will be deleted or stored safely and not re-used without permission by Starfish after the agreed period.

Signed: _____

Date: _____

Annex 3: Compliance Form for Journalists/Photographers

I agree to abide by the following guidelines:

- I will always inform any beneficiary or personnel member that I am a media/reporter and will explain the purpose of the interview and its intended use.
- I will not seek to spend time alone with children and adults-at-risk agree to always be accompanied by a Starfish personnel member in any media recording, filming or interview of children or beneficiaries.
- In any media recording/filming/interviews I will obtain prior consent (preferably written) from any child or beneficiary, or Starfish personnel member, before taking their images. If a child or beneficiary does not understand English, I will ask and explain my request using a translator in a language that they understand.
- I will portray the life situations of the children, families and communities with accuracy and dignity, and not in any vulnerable or submissive manner. I will not manipulate or sensationalise text, images or commentary.
- Whenever possible, I will allow beneficiaries to give their own accounts rather than speaking on their behalf. I will not ask leading questions or “put words into their mouths” in any interviews or questioning. I will not ask children or adults-at-risk to tell a story or take an action that is not part of their own history, nor will I ask in-depth personal questions that might reactivate a child's pain and grief from traumatic events.
- I will respect the fact that anyone being interviewed, photographed, or filmed has the right to change their minds and to stop the interview/filming/photography at any point, and I shall not discriminate against any child if they decide to do this.
- I will not use any personal / physical information to identify a child or adult-at-risk's location (their name, physical location, project name, school/clinic name etc) and will never use actual places and people's names.
- I will change the name and **obscure the visual identity** (for example back to camera) of any child or beneficiary who is identified as: a victim of sexual abuse or exploitation; a perpetrator of physical or sexual abuse; HIV positive/living with AIDS, charged or convicted of a crime; a child combatant, or former child combatant; an asylum seeker, a refugee or an internally displaced person.
- I will not contact, write or email children or adults-at-risk through any social media platform, give material support or give gifts to individual children that I have contact with during a visit. I will not use Starfish personnel to channel communications to individual children or adults-at-risk.

- I will not use cash or gifts or promises of any kind as a reward for interviews, photographs or filming.
- The rights to use of the photography, filming, interviews that I undertake will be Starfish’s and before images of children or beneficiaries are published on any website, they will be right-protected or otherwise saved in a way that ensures they cannot be used inappropriately — for example, adapted or copied for use on child pornography Web sites.

I understand that the onus is on me, as a person engaged by Asterias-Starfish Foundation, to respect all these guidelines and to put the best interests of the child and adults-at-risk first in all my dealings with these populations. Failure to comply will result in termination of the agreement to allow filming/recording and materials already filmed being destroyed.

Name: _____

Signed: _____

Date: _____

Organisation/Company _____

Email contact: _____

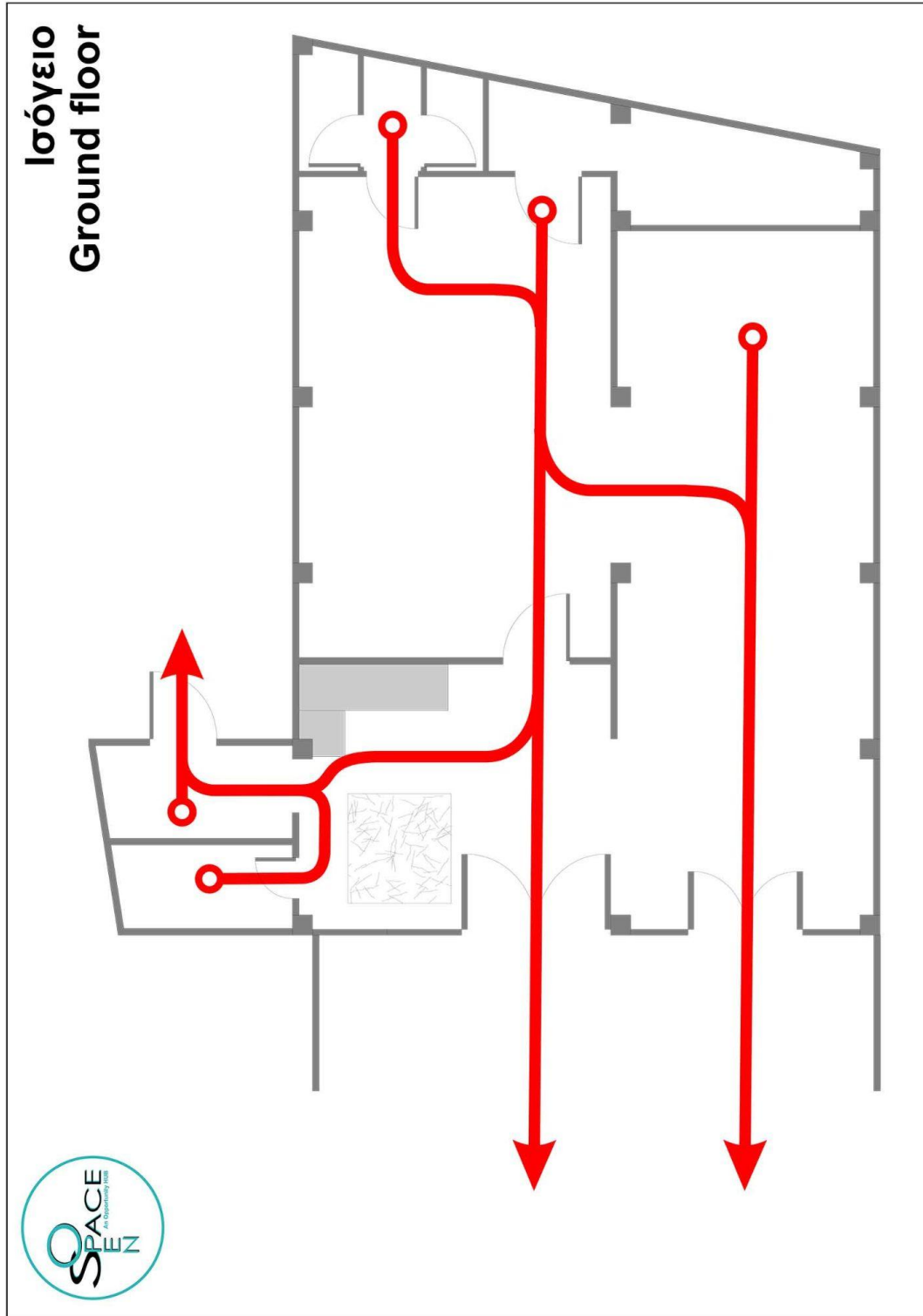
Witnessed by Starfish personnel member: _____

Signed: _____

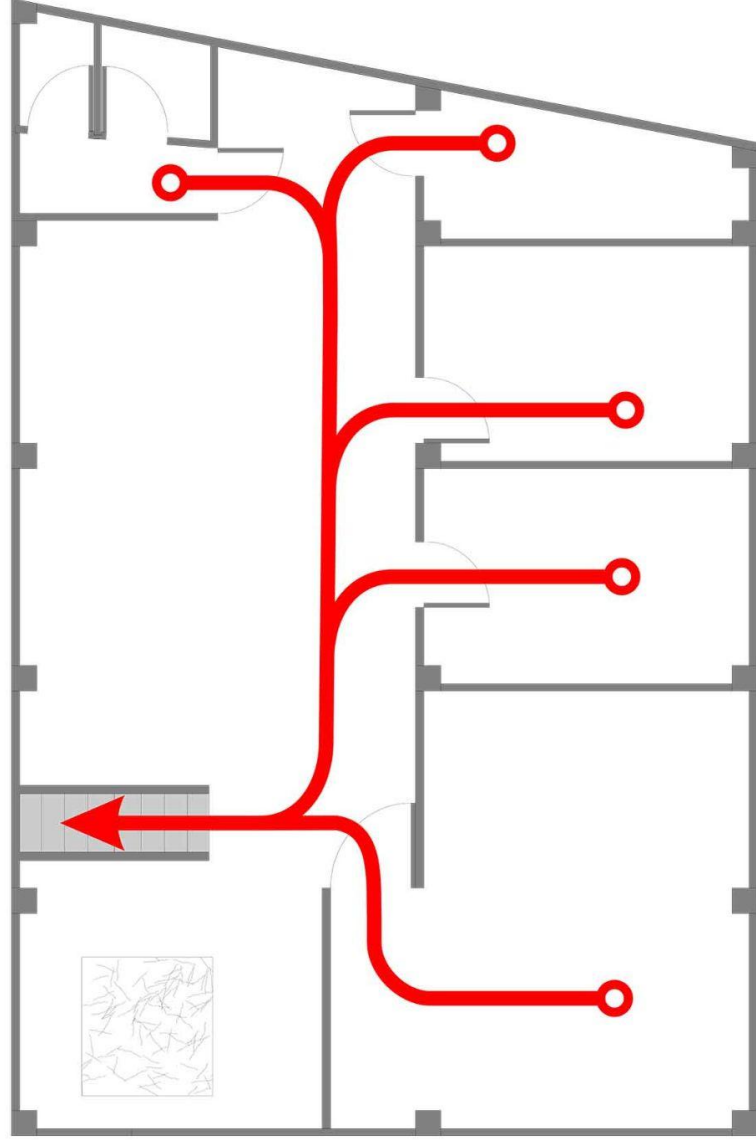
Read & Signed Starfish Code of Conduct (initial): _____

Annex 4: Fire and Evacuation Plans

OpenSpace



1ος όροφος
1st floor



Camp

