



# **Child Protection Policy**

Samos Volunteers

2020 Onwards

# I. INTRODUCTION

Founded in 2016 as a group of independent volunteers responding to the humanitarian crisis in Samos, Samos Volunteers operates following the principles of humanity, impartiality, independence and neutrality according to its core values: Do no harm, do it for the many, facilitating community, the little things are the big things and work in progress.

Samos Volunteers are committed to addressing the humanitarian need in Samos, through both hygiene and psycho-social activities, enhancing dignity and showing solidarity to residents of Samos RIC. Samos Volunteers aims to work sustainably with camp and local communities to offer immediate relief, build resilience and develop peoples potential. Samos Volunteers endeavours to do this in a responsible, sensitive, sustainable and inclusive way.

Our approach is guided by our 5 core values:

- **Do No Harm** We are committed to taking a critical approach to our activities to carefully consider our activities in order to minimise harm and maximise the positive impact of our services.
- **Do it for the Many** We are committed to using donor money to reach the maximum number of people in the community. To achieve this we strive for equality of access, meaningful inclusion and representation throughout our organisation.
- **Facilitating Community** We are committed to supporting the camp and local communities on Samos, responding to their needs and interests through listening, learning and adapting. We strive to facilitate the building of relationships between the communities to drive sustainable change.
- **The Little Things are the Big Things** We are committed to taking a thoughtful and reflective approach to the planning, implementation and evaluation of our work, acknowledging the wide ranging impacts that our operations can have for service users. We strive to provide considered and quality service users centred on our belief of humanity and solidarity.
- **A Work in Progress** We acknowledge that working in a dynamic environment requires us to adapt quickly in changing circumstances. We are committed to doing our very best in these circumstances and to respond to lessons learnt where we fall short.

## A. Policy Statement

Samos Volunteers is committed to respecting the highest standards in terms of efficiency, responsibility and transparency in its operations. To this end our policies:

- Develop Awareness
- Encourage Prevention
- Promote Detection
- Set Out a Clear Response to Concerns

This policy is aimed at guiding should be considered in conjunction with Samos Volunteers:

- [SV Policies & Code of Conduct](#)

As an NGO operating in the humanitarian context, Samos Volunteers recognizes that children within the communities with which Samos Volunteers works or comes into contact constitute a particularly vulnerable population group. As such, they are at greater risk of violence, negligence, abuse and exploitation - particularly in disaster and emergency contexts, where their protective environment is severely affected.

Samos Volunteers is aware that the goods and services provided through its services can create an imbalance in the relationship between those volunteering with Samos Volunteers or associated with the NGO and service users. Samos Volunteers recognizes that this power imbalance can be exploited and instrumentalized.

This Child Protection Policy demonstrates Samos Volunteers's commitment to protect children within the framework of its internal procedures and overall external coordination, and in particular for the implementation of child protection and the mainstreaming of this issue in its services.

This policy also clarifies, for all those volunteering with Samos Volunteers, what is required in terms of child protection. It also specifies that all violations of children's rights, in whatever form, are unacceptable for Samos Volunteer and will be sanctioned.

This policy has been developed so that the best interests of the child can be systematically taken into account by Samos Volunteers and to ensure the integration of child protection at the institutional level in order to promote the maximum protection of children against all forms of ill-treatment and negligence.

This policy ensures that Samos Volunteers has implemented procedures to prevent and respond to all forms of violence, ill-treatment, negligence, abuse and exploitation

regarding children, as well as any violation or non-compliance with this policy or any other related procedures.

This Child Protection Policy is based on national laws, relevant international law and international norms, in particular:

- Convention on the Rights of the Child, Code of Conduct for International Red Cross and Red Crescent Movement and Non Governmental Organizations (NGOs) in Disaster Relief
- The texts of the Alliance for the Fundamental Standards of Humanitarian Aid
- The minimum standards for protection during humanitarian action
- The standard of accompaniment to the Humanitarian Charter and the minimum standards of humanitarian intervention of the SPHERE project.

Samos Volunteers is committed to the well-being of children. Activities focused on children are based on the principles of the 1989 United Nations Convention on the Rights of the Child and the 1948 United Nations Declaration of Human Rights.

These principles are:

- The best interests of the child
- Non-discrimination
- Freedom of expression
- Respect for children's views in issues of interest to them
- Child participation.

Exploitation and violence against children refers to any physical and/or psychological form of ill-treatment, sexual abuse, negligence, abandonment or negligent treatment, exploitation, including commercial exploitation, including the use of children for military purposes, which may result in actual or potential harm to the health, survival, development or dignity of the child, in the context of a relationship of responsibility, trust or power.

Samos Volunteers is committed to take concrete measures to prevent the recruitment or engagement with Samos Volunteers of perpetrators of all forms of violence against children, including anyone associated with Samos Volunteers. All those directly or indirectly involved in the implementation and monitoring of Samos Volunteers' programmes and actions are bound by its Child Protection Values. If despite Samos Volunteers' precautions, any person volunteering with Samos Volunteers violates the provisions of this policy, Samos Volunteers will take disciplinary action in accordance with this policy.

## **Samos Volunteers Child Protection Principles**

In order to reach the above mentioned objectives, Samos Volunteers is committed to raise awareness among all Samos Volunteers staff, to carry out a prevention policy and, if required, to sanction behaviour that contravenes the present policy.

### 1) Awareness

- Training: As part of its recruitment, Samos Volunteers is training its staff and partners in the Code of Conduct, the Child Protection Policy and the reporting of all forms of violations. Whenever updates are prepared, sessions are organized to ensure that SV Volunteers are aware of any update and best practices regarding child protection.
- Staff directly involved in child-related activities will receive additional technical and specialized training, and may develop their skills on the subject, including (but not limited to) child protection policy, prevention of and response to violence against children, and integration of child protection into programmes.

### 2) Prevention

- Recruitment and selection of staff: Samos Volunteers prevents the employment/deployment of inappropriate individuals through rigorous selection processes, (i) face-to-face and videoconference interviews - where possible -, (ii) verification of experiences and references, including - where possible - obtaining additional documents provided by third parties for staff in direct contact with children. Persons who are registered for crimes and offences against children or persons who have been accused or convicted of serious criminal activities, as far as the information is accessible, are not entitled to be in direct contact with children as part of Samos Volunteers operations. Serious criminal activities include, among others: murder, sexual offences, offences and convictions for aggravated assault and battery, indecent behaviour, abduction crimes, crimes related to child prostitution or child pornography.
- Selection of partners: Samos Volunteers strives to collaborate with partners or suppliers who respect strict codes of conduct and professionalism.
- Strict application of the Samos Volunteers Code of Conduct: all Samos Volunteers and those of partner organisations must, within the framework of their contract, strictly apply the Code of Conduct. The Code explicitly prohibits harassment, abuse, sexual abuse and exploitation of children.

### 3) Action in case of a Policy Violation

- Investigation: if behaviours violating the requirements of this policy are reported to Samos Volunteers, Samos Volunteers is committed to carry out a thorough, impartial and timely investigation in order to fully investigate the allegations. This will be conducted by the volunteer

committee if concerning an internal personnel and the protection lead if it concerns an external person.

- Aware of the importance of a rapid response to allegations concerning child protection, Samos Volunteers is committed to do its utmost to ensure that the reports relating to the present policy can be treated as a priority.
- If it is confirmed that a person associated with Samos Volunteers has committed an act of violence against a child, a criminal act or any act that would violate children's rights or contravene the principles and norms listed in this document, Samos Volunteers will take disciplinary measures as well as any other action adapted to the facts and circumstances.

## II. INTERPRETATION AND APPLICATION

### Article 1 - Scope of Application

The policy applies to all SV Volunteers and governance members.

### Article 2 - Definitions

1. **Direct contact with Children:** For the purposes of this policy, being in the physical presence of a child or children in Samos Volunteers' work, whether occasionally or regularly, in the short or long term.
2. **Child:** For the purposes of this document, a "child" is defined as any person under 18 years of age, in accordance with the United Nations Convention on the Rights of the Child.
3. **III-treatment or negligence:** All forms of physical and/or psychological abuse, sexual abuse, negligence or negligent treatment, or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. Seven subtypes, in particular, are distinguished, in accordance with the definitions adopted, *inter alia*, by the WHO:
  - i. **Physical Abuse:** Actual or potential physical harm as a result of an interaction or lack of interaction, that is reasonably within the power of a person in a position of responsibility, power or trust. This may be a single incident or repeated acts.

- ii. Sexual Abuse:** Any use of a child's body for sexual purposes for the pleasure of someone older than the child, regardless of the relationship between them, and even without coercion or violence.
- iii. Commercial or other exploitation:** The use of a child for work or other activity in the interest of others. This includes, but is not limited to, work. These activities are harmful to the child's physical and mental health, education and spiritual, moral or emotional social development (WHO, 1999). Children in the armed forces fall into this category.
- iv. Sexual Exploitation** The abuse of a position of vulnerability, differential power or trust for sexual purposes; this includes, inter alia, profiting financially, socially or politically from the exploitation of a child. Prostitution and child trafficking for sexual abuse are examples.
- v. Emotional Maltreatment:** Failure to provide appropriate and supportive conditions for development, including a person to whom the child can relate as a priority, allowing the child to develop a range of stable emotional and social skills consistent with his or her personal potential and the context of the society in which he or she lives. It may also include acts that cause or are very likely to cause harm to the child's physical, mental, spiritual, moral or social health or development. Such acts must reasonably be the responsibility of the parent or person exercising a relationship of responsibility, trust or power. These include restriction of movement, denigration, use of the child as a scapegoat or sufferer, threat, intimidation, discrimination, derision or any other non-physical form of hostile treatment or rejection (WHO, 1999).
- vi. Negligence and negligent treatment:** The caretaker's inattention or failure to ensure the child's development in all areas, including health, education, emotional development, nutrition, shelter and safe living conditions, within the context of reasonably adequate resources. It is also about failing to provide the child with the necessary care and protection from harm to the extent possible (WHO, 1999).
- vii. Child labour:** Child labour includes full-time work by children under the age of 15 that prevents them from attending school (getting an education), or is hazardous to their health (International Labour Organization, Convention 138). Part-time child labour is permitted from the age of 15, except for activities that could in any way impede the child's access to education or development. SV applies a minimum age of 18 years.

#### **4. SV Volunteers:**

Under the terms of this policy, the term "SV Volunteers" refers to any person who has been accepted to volunteer with the organisation, on a full time, part time or ad hoc basis.

#### **5. Governance**

Under the terms of this policy, the term “governance” refers to any person elected by decision making bodies to participate in the managerial and administrative bodies of Samos Volunteers. In particular, the members of boards of directors are Governance members.

**6. Stakeholders:**

Under the terms of this policy, “stakeholders” are individuals or groups, with or without a legal personality, who directly or indirectly, voluntarily or involuntarily, contribute to, participate in or benefit, in any way, from the actions, programmes and activities of Samos Volunteers.

**7. Service Users:**

Under the terms of this policy, the term “beneficiaries” refers to any person who benefits, directly or indirectly, from Samos Volunteers’ programmes.

**8. Supplier:**

Under the terms of this policy, a “supplier” is a third party, individual or group, with or without legal personality, who directly or indirectly provides any type of goods and/or services to Samos Volunteers, whether for a fee or not.

## Article 3- Information and adherence to the Policy.

1. This policy is published under the authority of Samos Volunteers. SV Volunteers, as well as the other entities referred to in Article 1 of this policy, are required to conduct themselves in accordance with this policy and must therefore be aware of and have understood its provisions and any changes. When they are unsure of how to proceed, they should seek the advice of a competent person, notably their line manager.
2. SV Volunteers, as well as the other entities referred to in Article 1 of this policy, who are responsible to negotiate the terms of conditions of involvement of any SV Volunteers, must ensure that staff is aware of and commits to the full respect of this policy.
3. It is the responsibility of SV Volunteers with managerial responsibilities, as well as the other entities referred to in Article 1 of this policy, to ensure that volunteers under their supervision comply with this policy; and to take or propose appropriate disciplinary measures as sanction against any violations of its provisions.
4. This policy shall form part of the working conditions of SV Volunteers and the conditions of the involvement of the other entities referred to in Article 1 of this policy from the moment they certify that they have read it.
5. Samos Volunteers will review the provisions of this policy at regular intervals.

## **Article 4- Purpose of the Policy**

The purpose of this policy is to:

1. Implement mechanisms of child protection and child ill-treatment or negligence prevention for SV Volunteers and other entities referred to in Article 1 of this policy.
2. Specify the rules on child protection and child ill-treatment or negligence prevention that SV Volunteers and the other entities referred to in Article 1 of this policy must observe.
3. Inform third parties of the conduct that they are entitled to expect from SV Volunteers and the other entities referred to in Article 1 of this policy.

## **III. General Principles**

### **Article 5- Neutrality**

1. SV Volunteers and the other entities referred to in Article 1 of this policy, must fulfil their duties in a neutral and apolitical manner, in accordance with the law, legitimate instructions and ethical rules relating to their roles.

### **Article 6- Impartiality**

1. In the context of their professional roles and/or their projects, SV Volunteers and the other entities referred to in Article 1 of this policy, must act in accordance with the law and exercise their discretionary power in an impartial manner, taking only relevant circumstances into consideration.

### **Article 7- Confidence of Stakeholders**

1. SV Volunteers and the other entities referred to in Article 1 of this policy, have a duty to conduct themselves at all times in a way that reflects and upholds SV's values of integrity, impartiality and efficiency and contribute to strengthen the confidence of all stakeholders.

### **Article 8- Hierarchical responsibility**

1. SV Volunteers staff report to the field coordination team, unless otherwise provided for by law. Field coordinators report to the project manager who in turn reports directly to the board of directors.

### **Article 9- Confidentiality**

1. Duly considering the stakeholders' potential right to access information, SV Volunteers and the other entities referred to in Article 1 of this policy, must process all the information and all the documents acquired during or as part of the exercise of their duties with the necessary confidentiality.

## **Article 10- Protection of Privacy**

1. All the necessary measures must be taken to ensure that the privacy of SV Volunteers and of the other entities referred to in Article 1 of this policy, is appropriately respected; as a result, the declarations provided for this policy must remain confidential, unless otherwise provided for by law.

## **Article 11- Information Held**

1. Considering the general framework of international law regarding access to information held by private individuals, SV Volunteers and the other entities referred to in Article 1 of this policy, should disclose information only in respect to the rules and requirements applicable to Samos Volunteers.
2. SV Volunteers and the other entities referred to in Article 1 of this policy, must take appropriate measures to guarantee the security and confidentiality of the information for which they are responsible or of which they are aware.
3. SV Volunteers and the other entities referred to in Article 1 of this policy, must not seek access to information which would be inappropriate for them to have. SV Volunteers, as well as the other entities referred to in Article 1 of this policy, must not make inappropriate use of the information they may obtain in or as part of the exercise of their duties.
4. In the same way, SV Volunteers and the other entities referred to in Article 1 of this policy, must not retain professional information that may or should be legitimately circulated, or circulate information they know, or have reasonable grounds to believe, is inaccurate or misleading

## **Article 12- Responsibility of line managers**

1. SV Volunteers in charge of supervising or managing other SV Volunteers must do so in accordance with the policies and objectives of SV. They are responsible for responding to acts and omissions of volunteers under their supervision who violate these policies and objectives, and to take due diligence measures expected from a person in their position to prevent such acts or omissions.
2. SV Volunteers tasked with supervising or managing other SV Volunteer must take the necessary measures to protect children and prevent staff under their

supervision from engaging in acts likely to generate child ill-treatment or negligence. These measures may be: to draw attention to and implement the laws and regulations; to ensure adequate training related to child ill-treatment or negligence and to set an example of integrity through their personal conduct.

## IV. CHILD PROTECTION MECHANISM

### Article 13- Importance of Prevention

1. Samos Volunteers and the other entities referred to in Article 1 of this policy, shall be sensitized to the children's rights. To this end, SV is training SV Volunteers in the Samos Volunteers Code of Conduct, this policy and specifically informing about the need to report any form of child ill-treatment or negligence.
2. SV Volunteers who are in direct contact with children are entitled to receive special training in particular on Child Protection Policy, prevention and response to child ill treatment or negligence as well as on integration of child protection into programmes.
3. SV Volunteers, as well as the other entities referred to in Article 1 of this policy shall actively protect the child in particular through attention, prevention and response to all forms of child ill-treatment or negligence as defined in Article 2 of this policy.

### Article 14- Prevention and Identification Mechanisms

1. Although, through its international actions. Samos Volunteers is faced with the most diverse cultures and belief systems Samos Volunteers fully upholds principles of freedom of speech and of protection of victims. As such, Samos Volunteers has developed mechanisms that can contribute to prevent child ill-treatment or negligence such as:
  - Signing of the Code of Conduct by volunteers in order to clarify unacceptable behaviour and in particular child ill-treatment or negligence;
  - Information to the beneficiaries of existing remedies (notably through the Complaints and Response Mechanisms - CRM) allowing to

- sensitize all the stakeholders of a project and to ensure that the field teams maintain a respectful dialogue with the beneficiaries;
  - Implementation of trainings and awareness sessions in order to train and empower the teams, particularly for staff exposed to working with minors or the most vulnerable population;
  - Identify risk factors on an ongoing basis and in particular throughout the project cycle;
  - Put in place evaluation procedures for Samos Volunteers partners by carrying out due diligence, particularly with regard to their ethical commitments and past behaviours.
2. Samos Volunteers staff responsible for recruiting, monitoring or directing others employed by Samos Volunteers must be careful to prevent the hiring or deployment of inappropriate individuals in direct contact with children. This includes:
    - Incoming coordinators who are required to provide a recent criminal records check prior to commencing their role.
    - Incoming volunteers who are required to provide either a recent criminal records check and/or a reference (a previous employer, education professional or other upstanding member of the community).
  3. As soon as Samos Volunteers is aware of, any person who has been convicted of, or registered on lists or registers, for offences of child ill-treatment or negligence, within the meaning of this policy and regardless of the legal qualification retained by the national courts, shall not be in direct contact with children, within the framework of Samos Volunteers' programmes.
  4. Any Samos Volunteer partner or subcontractor in direct contact with children must certify that they have read and comply with the provisions of this policy.

## **Article 15 - Prohibition of all forms of child-ill treatment or negligence**

1. It is strictly forbidden for SV Volunteers and the other entities referred to in Article 1 of this policy, directly or indirectly, voluntarily or involuntarily, to participate, organise or benefit, by any means whatsoever, from any form of child ill-treatment or negligence as defined in Article 2 of this policy.

## **Article 16- Behavior to be followed in case of child ill-treatment or negligence.**

1. In the case of SV Volunteers who witness child ill-treatment or negligence:
  - If a SV Volunteer believes that they are witness to any of the conduct set out in Article 2 of this policy, committed against any individual, they shall have a direct contact with the perpetrator in order to end such behaviour provided that the facts are not far too serious to exclude such an approach.
  - If the inappropriate behaviour does not cease or if SV Volunteers are unable to address the perpetrator directly, he or she must report the facts in accordance with Article 18 of this policy.
  - It is advisable to note the day and time as well as details related to the facts and the names of any witnesses.
  - In any case, the Protection Lead must be informed. If appropriate, the field coordination team must also be informed of the facts in order to take appropriate measures and to conduct an internal investigation in a timely manner.
2. In the case of a stakeholder who witnesses child ill-treatment or negligence:
  - If any stakeholder as defined in this policy believes that they are a witness or victim of the violation of this policy, they shall address the perpetrator directly in order to end such behaviour provided that the facts are not far too serious to exclude such an approach.
  - If the inappropriate behaviour does not cease or if the stakeholder is unable to address the perpetrator directly, they must report the facts in accordance with Article 19 of this policy.
  - It is advisable to note the day and time as well as details related to the facts and the names of any witnesses.
  - In any case, the Project Manager and the Protection Lead must be informed. If appropriate, the board members must also be informed of the facts in order to take appropriate measures and to conduct an internal investigation in a timely manner.

## Article 17- Photographs of Children

1. Taking and distributing pictures of children is not allowed for SV Volunteers in the framework of their volunteering duties.
2. Only persons duly authorized by the Samos Volunteers Board or project manager can take photos of children in connection with Samos Volunteers Programmes.
3. Authorized persons shall:
  - Comply with local practices and restrictions related to the reproduction of personal images before photographing or filming a child;

- Obtain the child's express verbal consent and the written consent of the child's parent or guardian before photographing or filming the child. Within this framework, the objective and the use of the produced photographs will have to be explained;
- Ensure that photographs, films, videos and other representations present children in a dignified and respectful manner and not in a vulnerable or submissive manner.
- Children must be dressed and must not pose in a manner that could be considered provocative or sexually suggestive;
- Ensure that images are honest representations of context and reality.

4. In addition, authorized persons shall:

- Obtain the express consent of the child and the written consent of the child's parent or guardian before using an image for publications, advertising, fundraising, advocacy or other purposes, in print or online. The purpose and use of the photographs will be clearly specified to the consenting party;
- Obtain explicit consent from the child, but not necessarily from the child's parent or guardian, for the images and photos with children from behind or at a distance (not identifiable);
- Not reveal the identity of the information or divulge information such as to enable children to be identified or located in the image through the name of the photo files, as well as the metadata or descriptions and texts associated with the photos, in the context of the dissemination, sending and publication in all their forms of electro-technical images.

## Article 18- Obligation to report for SV Volunteers

1. SV intends to respond/come up with an answer/bring an (appropriate) response to any child ill-treatment or negligence. To contribute towards this, Samos Volunteers has designated a focal point via a specific email address [concerns@samosvolunteers.org](mailto:concerns@samosvolunteers.org).
2. SV Volunteers who consider to be a witness of child ill-treatment or negligence which may be in violation of or contravenes the present policy, must report it to the protection lead, Project Manager and/or [concerns@samosvolunteers.org](mailto:concerns@samosvolunteers.org).
3. SV Volunteers must report to their line manager and/or the Project Manager and the Protection Lead, and/or to [concerns@samosvolunteers.org](mailto:concerns@samosvolunteers.org), any evidence, allegation or suspicion of child ill-treatment or negligence of which they are aware in or in the course of their duties. The investigation of the reported facts is SV's responsibility, in accordance with the provisions of Article 20 of this policy.

4. If reporting to the protection lead is not appropriate, SV volunteers should report to the project manager and/or through [concerns@samosvolunteers.org](mailto:concerns@samosvolunteers.org).
5. SV Volunteers may use the Incident Reporting (IR) format and/or the grievance form to report.
6. Samos Volunteers must ensure that SV Volunteers who report a case as described above on the basis of reasonable suspicions and in good faith does not suffer from any harm as a result.
7. Cases of misuse of complaint mechanisms may be subject to sanctions.

## Article 19- Report to stakeholders

1. Samos Volunteers wishes to support people who are witnesses or victims of violations of the present policy. To this end Samos Volunteers intends to facilitate stakeholders reporting for any violation of this policy. Thus, any stakeholder, as defined in this policy, who is a witness or victim of the violation of the present policy can report to Samos Volunteers through the Mechanisms outlined on the code of conduct and policies page on the website.
2. Samos Volunteers must ensure that any stakeholder who reports a case as described above on the basis of reasonable suspicions and in good faith does not suffer from any harm as a result.

## Article 20- Samos Volunteers investigation in case of internal reporting.

1. In accordance with Article 17 of the present policy, SV Volunteers must inform the protection lead or project manager and in any case at [concerns@samosvolunteers.org](mailto:concerns@samosvolunteers.org) in case of suspicion of child ill-treatment or negligence.
2. An e-mail response is sent by [concerns@samosvolunteers.org](mailto:concerns@samosvolunteers.org) upon receipt of the complaint. This answer:
  - details the process to be followed in cases of suspected child ill-treatment or negligence;
  - requests, where appropriate, further clarification and evaluation of the complaint.
3. The management of the complaint is done either by the protection lead, protection lead and project manager and/or in conjunction with the board of directors depending on the seriousness of the reported facts.
4. SV Volunteers must: Cooperate in any investigation conducted by Samos Volunteers; keep all records of any alleged involvement that may be required for an investigation; preserve the confidentiality of any allegation.

## **Article 21 - Samos Volunteers investigation in case of reporting by a stakeholder**

1. In accordance with Article 19 of this policy, stakeholders may report through the Complaints and Response Mechanisms any cases of suspected child ill-treatment or negligence.
2. A response will be provided upon receipt of the complaint. This response:
  - details the process to be followed in the event of suspicion of child ill-treatment or negligence;
  - requests, where appropriate, to provide further clarification and elevation of the complaint.
3. SV Volunteers and other entities referred to in Article 1 of this policy must: cooperate in any investigation conducted by Samos Volunteers; keep all records of suspected involvement in such cases that may be required in case of investigation; preserve the confidentiality of all allegations.

## **Article 22- Investigating Authority**

1. The Protection Lead is responsible for the independent oversight of child protection policy and is responsible for its implementation within Samos Volunteers.

## **Article 23- Sanction for child ill-treatment or negligence.**

### **1. Disciplinary Sanction**

The violation of the present policy, which constitutes in particular a violation of Samos Volunteers' Code of Conduct, may result in sanctions ranging from warning to termination of the volunteering agreement for serious misconduct, with no notice and no payment of compensation.

### **2. Reporting to the Competent Authorities**

Samos Volunteers has the right, depending on the seriousness of the facts found, to report to the competent prosecution authorities the facts constituting child ill-treatment or negligence.

## **V. IMPLEMENTATION OF THE POLICY**

## **Article 24- Implementation date of the policy**

1. The Child Protection Policy comes into effect after approval from the Samos Volunteers board on 25/02/2021

## **Article 25 - Adherence to the Policy**

1. SV Volunteers and the other entities referred to in Article 1 of this policy, certify that they adhere to these principles by signing the Samos Volunteers Volunteer Agreement Form.

## **End of Policy**