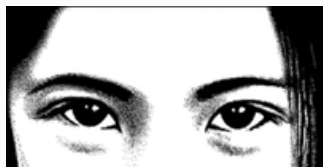




SAFEGUARDING POLICY

2026



Terre des hommes

Αρωγοί των παιδιών παγκοσμίως.

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1. INTRODUCTION



Terre des hommes Hellas- Helping children worldwide – (hereinafter referred as “Tdh Hellas”) believes all people should be safe and protected from all forms of harm and abuse. Safeguarding is fundamental to our identity as a humanitarian and development organization. Tdh sees safeguarding as a responsibility and a foundation for its work and is committed to preventing harm from occurring to children, youth, vulnerable adults, all staff members at all levels (including volunteers, interns, apprentices, independent consultants), and community members and responding appropriately when harm occurs.

Aim

The Safeguarding Policy (hereinafter “the Policy”) aims to describe the framework for responding to incidents of compromise and exposure to risk and to establish a commitment to taking all reasonable measures to prevent them. Implementation of the Policy is mandatory and is adapted to national cultural contexts without compromising the core principles described below. ¹

Applicability

This Policy applies to:

1. All staff members and at all levels (including volunteers, interns, apprentices, independent consultants).
2. Any individual or entity working on behalf of Tdh in all its locations (this includes implementing partners).
3. Any individual or entity carrying work for Tdh in all its locations (this includes contractors and suppliers).

Everyone who represents Tdh is responsible for creating a safe environment for people who participate in all our activities, people with whom we work, and our staff. Tdh senior management at all levels is accountable for the implementation and dissemination of the Policy and for taking all the appropriate measures for prevention and response. Children, youth, and vulnerable adults who are active and/or participate in our programmes must be aware of and understand the importance of the policy. Therefore, (Tdh) commits to ensuring that children, youth, and vulnerable adults understand the safeguarding policy. Additionally, a child-friendly version of the policy will be made available.

¹ This Policy was based on the Safeguarding Policy developed by the Terre des hommes Headquarters in Lausanne and through consultation meetings with representative groups of children, youth, and vulnerable adults in Albania and Bangladesh. Safeguarding Policy (2025), Child Protection Sector and Global Office of Ethics and Compliance. For more information, see here: <https://www.tdh.org/en/digital-library/documents/child-safeguarding-policy>



LEGAL AND REGULATORY FRAMEWORK

Several sets of safeguarding standards apply to the humanitarian and development sector. They define and describe what is required for an organisation to work safely and protect the people who are directly involved in their programs. Safeguarding standards help organisations deliver good quality programs that are accountable to communities. In addition, donors often require organisations to meet certain standards and strengthen their capacities to qualify for funding.

This Policy is aligned with the following global standards:

1. Inter-Agency Standing Committee (IASC) Minimum Operating Standards for Protection from Sexual Exploitation and Abuse by own Personnel;²
2. Core Humanitarian Standards³ (CHS) and its framework for Quality and Accountability.
3. International Child Safeguarding Standards by Keeping Children Safe.⁴
4. Development Assistance Committee (DAC) Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance.⁵

This policy is also aligned with the following international conventions and legislation:

1. UN Convention on the Rights of the Child (UNCRC).
2. Universal Declaration of Human Rights (UDHR).
3. Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW).
4. Convention on the Rights of Persons with Disabilities (CRPD).
5. European Union legislation.

In case of misalignment between global standards, context-specific regional or national laws and the Policy, more stringent regulation should be applied.

² https://interagencystandingcommittee.org/sites/default/files/migrated/2016-01/3_minimum_operating_standards_mos-psea.pdf

³ <https://www.corehumanitarianstandard.org/>

⁴ <https://www.keepingchildrensafe.global/international-child-safeguarding-standards/>

⁵ [https://one.oecd.org/document/DCD/DAC\(2019\)31/FINAL/en/pdf#:~:text=The%20DAC%20Recommendation%20is%20built,raising%2C%20and%20communication%3B%20v\);](https://one.oecd.org/document/DCD/DAC(2019)31/FINAL/en/pdf#:~:text=The%20DAC%20Recommendation%20is%20built,raising%2C%20and%20communication%3B%20v);)



PRINCIPLES

Regarding children Tdh is committed to respecting the **four (4) Principles** of the UN Convention on the Rights of the Child (UNCRC) and the Minimum Standards for Child Protection in Humanitarian Action (CPMS):

1 Non - discrimination	Children should enjoy their rights and never be subjected to discrimination. We should detect and prevent any discrimination traits and address them in a timely manner if they occur.
2 Best Interests of the Child	In all its actions with and related to children, the best interests of the child shall be a primary consideration. This principle should be a guiding principle during the project management cycle.
3 The Right to Survival and Development	We must consider the impact of our activities and interventions on children's survival and development.
4 The Views of the Child	We must ensure that children's views are respected and are given adequate opportunities to participate in decisions that affect them. Children should be supported to express their views freely.

In addition, Tdh safeguarding policy is guided **by the principle of Article 5⁶** of the United Nations Convention on the Rights of the Child (UNCRC), which acknowledges the vital role of parents, guardians, and caregivers in providing appropriate guidance to children. We respect the evolving capacities and maturity of children ensuring that our approach to safeguarding adapts to their development stage. We are committed to supporting children, in collaboration with their caregivers, to understand and exercise their rights within a safe and protective environment.

⁶ [Convention on the Rights of the Child text | UNICEF](#)



Tdh aligns with the Inter-Agency Standing Committee (IASC) **six (6) Core Principles** relating to Sexual Exploitation and Abuse (**SEA**) and adopts them:

Core Principle 1: No second chances	Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
Core Principle 2: No sexual activity with children	Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. A mistaken belief regarding the age of a child is not a defense.
Core principle 3: Don't hire/bridge anyone for sex	Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading, or exploitative behavior is prohibited. This includes the exchange of humanitarian assistance that is due to beneficiaries for sexual favors.
Core Principle 4: No sexual activities with beneficiaries	Any sexual relationship between those providing humanitarian or development assistance and protection and a person benefitting from such assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian and development aid work.
Core principle 5: Always report SEA	Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
Core principle 6: Discourage SEA around you	Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have responsibilities to support and develop systems which maintain this environment.



DEFINITIONS

A. **Safeguarding:**

For Tdh, as an umbrella term it means taking all necessary steps to prevent harm to both aid recipients (children and adults) and staff and responding appropriately if harm occurs. This applies equally to both development and humanitarian assistance settings.

B. **Child Safeguarding:**

Child safeguarding is the responsibility of organizations to ensure their staff, operations, and programs do no harm to children, do not expose children to the risk of harm and abuse. Thus, any concerns that the organization has about children's safety within the communities in which they work are reported to the appropriate authorities.⁷ This includes both preventative actions to minimize the chances of harm occurring and responsive actions to ensure that incidents which may happen are appropriately handled. For this Policy, a child means anyone **under 18 as per the UN Convention on the Rights of the Child (UNCRC)**⁸. Being mistaken about the child's age is not a valid defense in the event of a breach of this Policy. This Policy covers the following forms of abuse:

Physical abuse: The act in which a person causes a child physical injury, illness, or pain, or subjects the child to neglect or similar. This may involve the person hitting the child with or without an implement, pinching, kicking, pushing, throwing, shaking, pulling the child's hair, scratching, or biting the child, stepping, or stamping on the child, or forcing objects into the child's mouth. Physical abuse also includes poisoning, burning, scalding, scratching, and trying to drown or suffocate the child. Any form of corporal punishment is considered physical abuse of children.

Psychological abuse: Psychological abuse includes severe punishment, ridicule, criticism, mockery, disparagement, rejection, freezing out, unreasonable demands, forced isolation from social contacts and age-appropriate activities, threats, and constant refusal to listen to what the child has to say. Certain harmful experiences shall also be considered psychological abuse, for example, if the child is forced to witness (see or hear) violence in his/her immediate environment or live in an environment where there is frequent violence or threats of violence. All forms of physical abuse of children, including sexual abuse, involve psychological abuse.

Sexual abuse: Covers all forms of sexual acts or threats forced on a child by another person in a position of power. Sexual abuse means that the other person is exploiting the child's position of dependence, and the act is based on the other person's purposes that violates the child's integrity, takes place against the child's will, or is something that the child cannot understand, is not mature enough to undertake, or cannot give informed consent to.

Sexual exploitation: Actual or attempted abuse of a child's vulnerable position for sexual purposes based on a position of power or trust. This includes but is not limited to, promising the child monetary, social, or political gain through sexual exploitation.

Sexual abuse online (through the internet): Covers all forms of sexual abuse and threat, physical and non-physical, which forced on a child by another person through the internet.

⁷ <https://www.keepingchildrensafe.global/child-safeguarding/>

⁸ [Convention on the Rights of the Child | UNICEF](#)

C. Safeguarding Vulnerable Adults:

For this policy, an adult means anyone over the age of 18 who is the recipient of the aid provided through Tdh activities. A vulnerable adult is generally defined as an individual who, due to age, disability, illness, religion, sexual orientation, or other factors, is at an increased risk of harm, exploitation, or abuse; adults who require assistance and support and who are experiencing or are at risk of abuse or neglect and are unable to protect themselves. Abuse can take place in many forms but is commonly seen as discrimination, neglect, sexual abuse, financial abuse, and physical abuse. Tdh is committed to protecting vulnerable adults from abuse and putting in place efforts and measures that enable them to make informed choices.

D. Protection against Sexual Exploitation, Abuse, and Harassment (PSEAH):

Child safeguarding focuses on protecting children from all forms of harm, while PSEAH (Prevention of Sexual Exploitation, Abuse, and Harassment) addresses sexual misconduct affecting both children and adults in organizational settings.

For Tdh PSEAH falls under safeguarding, and it applies the Inter-Agency Standing Committee (IASC) Task Force definition of SEAH valid for all Tdh staff at all levels and all aid recipients:⁹

Sexual abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation or abuse of another.

Sexual harassment: Any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation. Sexual harassment may occur in the workplace or in connection with work. While typically involving a pattern of conduct, sexual harassment may take the form of a single incident.

⁹ <https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>



REPORTING PROCEDURE

The reporting procedure describes how to handle inappropriate behavior by Terre des hommes Hellas staff members that is offensive and contrary to the Code of Conduct and the Safeguarding Policy, using established internal reporting channels. At the same time, it explicitly refers to the measures in place to protect staff members from any form of retaliation when they report in good faith and without intent to distort the truth, and cooperate with any potential investigation, if required.

A. Commitment

Terre des hommes Hellas

- Takes the reporting process very seriously and does not tolerate any retaliation against any staff member who reports suspected violations of policies or who cooperates in an investigation.
- Recognizes that it is very difficult to fully protect a person who makes a report from potential retaliation when that person is not a member of our staff. We encourage and support our partners or other organizations to have their own safe reporting policies.
- Follows the Core Humanitarian Standard Alliance's guidelines for the protection of whistleblowers (<https://www.corehumanitarianstandard.org/>)

Terre des hommes recognizes that establishing a culture of zero tolerance for silence (Speak Up) is an ongoing and vital process. Tdh is committed to promoting a culture of disclosure and to fostering a safe work environment.

B. Definitions

Report: It is a verbal or written objection to or report of a violation of a rule or of a policy.

Subject of Complaint: The subject who, in the report, is alleged to have violated a rule or a policy.

Whistleblower/Reporter: A person who reports a suspected or actual misconduct, and who believes that to the best of his/her knowledge that the information provided is true at the time of reporting.

Bad faith / malicious reporting: A person who intentionally makes false allegations that they know is untrue or misleading. This is considered a serious matter that may result in disciplinary action and up to termination of employment contract.

C. Pathways and Content of reporting

Employees are required to report any inappropriate behavior as soon as possible using the established reporting channels described below.

1. To the Human Resources Department
2. To the Safeguarding Focal Point/ Ethics and Compliance team
3. To the supervisor or any senior member of the organization

The report may be made **either verbally or in writing via email** to grc.safeguardinghellas@tdh.org

In the case of a verbal report, the complainant should follow up shortly thereafter with a written report in accordance with the instructions provided.

The report should include as much information as possible to support the investigation of the incident in question. Include:

At a minimum, include:

- Type of incident
- Dates, times, location of incident
- Detailed description of the alleged incident
- How you became aware of the issue
- Name of each person involved, and their roles
- Documentation, witnesses, and other elements available to support the allegation
- Other information that you have that support your report

When describing the incident, try to avoid offering interpretations or personal conclusions; instead, provide as objective and clear an account of the events as possible.

Communication and visibility materials should be available and posted in a language understandable to all parties involved, providing clear information and messages. Posters should be displayed in areas primarily used by Tdh staff, such as Tdh headquarters, field offices, guesthouses, storage areas, etc.

Anonymity and use of aliases

Reports submitted anonymously or using aliases are accepted although they are discouraged as the protective measures provided in this Policy cannot be given to the Reporter. It may also make it difficult to investigate the issue or take necessary action; therefore, it is important for anonymous reports that the Reporter provides substantiated supportive evidence that allows the investigation to advance.

Failure to report

Failure to report consists of misconduct and will result in disciplinary action up to and including termination.

To note that **any reporting made in bad faith (malicious reporting)**, when substantiated, will be met with disciplinary measures, as applicable

Reporting to the Police:

If a report is received that is not within Tdh's own operations and that indicates a potential breach of national laws in connection with harm to a child or any other beneficiary, it will be assessed by the relevant delegation and reported, if applicable, to the nearest police station.

Near miss reporting:

A near miss is an unplanned event that did not result in injury, illness, or damage – but had the potential to do so. Near miss reporting is an important part of ensuring that Tdh operations are safe and secure for children and vulnerable adults, but also an important element in continuously strengthening and improving our operations and our procedures. Reporting must be carried out irrespective of the level of risk and anything that increases the risk of harm to children and vulnerable adults must be reported. Near miss reporting is a way to continuously improve our operations and reduce the risk of incidents.

You must submit a near miss report if you discover failings in our operations that could have breached the Safeguarding Policy, but where no child and vulnerable adult has come to harm yet.

Whistle-Blower Protection

Tdh will protect anyone who reports suspected misconduct in good faith from negative action taken against them and will not tolerate any form of retaliation against whistle-blowers and reporters. Any allegation received will be handled by the Ethics and Compliance team in confidentiality according to its Incident Management Procedures. Terre des hommes Hellas is committed to taking all necessary measures to protect the identity of the parties involved. If required by law, this information may need to be disclosed in order to conduct relevant investigations and take appropriate action. In such a case, advance notice will be provided. The subject of the complaint fully enjoys the presumption of innocence and the right to a defense throughout the entire process.

Protective Measures for the Subject of Complaint

Any staff member who has reasonable grounds to suspect that a misconduct has occurred and reports it is considered to be engaging in a protected act. If any information is received that the complainant has suffered retaliation or is at risk of retaliation for reporting allegations of misconduct, they must report this immediately so that the necessary protective/disciplinary measures can be taken. These measures will be assessed with the complainant's consent and may range from the temporary suspension or removal of the individual suspected of retaliation to termination of the contract.

Investigations will take a survivor-centered approach, and specialized support services will be available for victims/survivors of abuse. This may include counseling services, legal assistance, and other services that prioritize the best interests of the victim/survivor and are based on assessed needs



PROCEDURE FOR INVESTIGATING REPORTED INCIDENTS

This section is intended to outline the steps that the Ethics and Compliance team¹⁰ will take after receiving any report or complaint through one of the aforementioned reporting channels.

Step 1: Confirmation Notice

Once the report or complaint is received, the Ethics and Compliance team sends an acknowledgment of receipt to the sender.

Step 2: Analysis and Evaluation

The Ethics and Compliance Team will conduct a preliminary analysis and assessment of the report's details within 5 business days in order to classify the reported incident and proceed with the most appropriate assignment.

CATEGORY 1	All reports that indicate a violation of the Safeguarding Policy and concern individuals receiving services (beneficiaries)	Safeguarding Focal Point
CATEGORY 2	All reports alleging a violation of the Safeguarding Policy and involves the staff members	HR Coordinator
CATEGORY 3	All reports alleging violations of the Policy on Fraud, Corruption, and Conflicts of Interest and the Policy on the Financing of Criminal Activities.	Ethics and Compliance team in collaboration with the Finance and Logistics Senior Officer

Some reports may contain information from more than one of the above categories. In such cases:

- The Ethics and Compliance Team will categorize the report accordingly and forward it to the appropriate parties.
- Each relevant stakeholder will review the corresponding parts of the report separately.
- All relevant stakeholders will share the report, their conclusions, and supporting documentation from their reviews with the Ethics and Compliance team for the final evaluation of the review.
- All relevant parties must sign a Non-Disclosure Agreement (NDA) and agree to comply with confidentiality requirements.

STEP 3: Data collection and case formulation

The Ethics and Compliance Team will determine the severity level of the report (low, moderate, high), document the available and relevant data and information, and assign the case to the case manager

¹⁰ The Ethics and Compliance Team always consists of two members of the Terre des hommes Hellas staff and one member of the Board of Directors, who serves in an advisory capacity in matters related to compliance.

responsible for handling such matters. Data collection is conducted through individual interviews with the parties involved and any other person who may contribute to the investigation process.

At the same time, the team will assess whether the complainant and/or the victim or survivor needs immediate support and will contact them to inform them about available options for referral to specialized services. Referrals will only be made with the individual's explicit consent, in accordance with a survivor-centered approach.

Step 4: Finalization of the investigation process

Once the review/investigation is complete, the Ethics and Compliance team will prepare a final report outlining the findings of the case, an assessment of the violation, and recommended actions. The relevant committee will contribute to the recommendations regarding the case, including recommendations on applicable disciplinary measures.

Step 5: Decision Making Process

The Ethics and Compliance Team will provide written notification of the Report, including the final conclusions, recommendations, and action plan, to the responsible party or parties within 3 business days of the completion of Step 4. with notification to the relevant Department Head/Director and, where appropriate, to other members.

Upon request and if deemed appropriate, the Ethics and Compliance team will organize an informational meeting with the relevant managers and/or department heads.

STEP 6: Closure and filing of the case

It is the responsibility of the relevant individuals to ensure that the case file is archived and will be used to verify that all steps were followed.

The Ethics and Compliance team will file all relevant documents for cases it has handled in accordance with the above procedures on the case management platform. All other files created on personal devices and drives must be deleted.

In the event that the complaint concerns members of the Ethics and Compliance team, the matter will be handled by senior management

The Ethics and Compliance team is committed to assessing needs and risks and providing relevant support within the framework of all incident management procedures and for all parties involved.

The management of all cases must be guided by the following principles:

- Impartiality to ensure procedural fairness.
- Accountability
- Confidentiality*
- Survivor-centered approach**
- Presumption of innocence
- Zero tolerance

*Confidentiality is maintained by all parties involved. Non-disclosure agreements/confidentiality agreements are distributed to all individuals involved.

** The survivor-centered approach follows the approach recommended by the Core Humanitarian Standards Alliance and ensures that survivors remain at the forefront, providing a suitable environment that is safe and empowers them to express their views during the investigation.

The survivor's dignity, needs, wishes, experiences, thoughts, and resilience are at the center of the investigation. The survivor is informed about the research and its progress, and actions are taken only after obtaining their consent.

The team interacting with the survivor must maintain confidentiality and apply survivor-centered principles: safety, confidentiality, respect, and non-discrimination.

If the survivor is a child (under 18 years of age), the approach must be in the child's best interest, and collaboration must take place with a parent or guardian of the child's choice and the relevant authorities where they are involved

Responsibilities of Tdh Hellas staff during the incident investigation process

- Do not conduct your own investigation into any allegation, report, or suspicion; do not attempt to verify the facts and/or confirm the alleged conduct as misconduct.
- In such situations, ensure that immediate protective and emergency support measures are taken by referring the incident discreetly and confidentially to the appropriate reporting personnel or team.
- Immediately report any suspicion or allegation to the Ethics and Compliance team.
- Offer your full cooperation in the review/investigation of an allegation/report under the Code of Ethics.
- Comply with confidentiality requirements and incident management procedures. A breach of confidentiality is considered a violation and may result in disciplinary and/or other legal action.



PREVENTION STRATEGIES

Tdh is committed to helping prevent harm by implementing mandatory safety training for new staff members at all levels and by holding regular refresher sessions. It establishes robust procedures for safer hiring, proactive risk identification, reporting, incident management, and investigation. The Ethics and Compliance Team, with the support of Management, will monitor the implementation of the policy, which will be reviewed periodically. At the same time, an annual training workshop for all staff will be organized to foster reflection, learning, and the reinforcement of the policy's implementation.



SANCTIONS

Tdh reserves the right to impose disciplinary sanctions, in accordance with the personnel regulations in force in the country of operation, up to and including termination. Please see «Complaint and Feedback Response Mechanism- Appendices.



APPENDICES

This policy is accompanied by a series of appendices that describe in detail the procedures supporting the assurance framework, as well as the tools used to implement the above policies.

Specifically, the appendices include:

1. Code of Conduct
2. Responding to Incidents and Concerns
3. Concern Reporting Form
4. Confidentiality Consent Form
5. Use of Photographs and Video Footage
6. Online Safety
7. Supervision of Activities, Field Trips, and Overnight Stays
8. Regulations for the Provision and Management of Food and Beverages
9. Parent and Guardian Consent Form
10. Evaluation and Action Plan
11. Mechanism for Responding to Reports and Feedback



**Terre des hommes Hellas
is one of the leading child protection
organizations in Greece
and is part of
the Terre des hommes global network**

Find out more at www.tdh.gr



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Helping children worldwide.