

## **Syrian German Medical Association (SGMA)**

### **Child Protection and Protection from Sexual Exploitation, Abuse and Harassment (PSEA) Policy**

#### **1. Purpose**

The purpose of this comprehensive policy is to establish clear and actionable commitments that ensure all SGMA activities are implemented with the highest standards of protection for children and vulnerable individuals. SGMA acknowledges the inherent power imbalances that exist in humanitarian and medical settings and commits to taking all reasonable steps to prevent, detect, and respond to child abuse and sexual exploitation, abuse, and harassment (SEAH). This policy ensures that children are safe from harm and that survivors of SEAH receive support, justice, and care.

This policy aligns with the United Nations Convention on the Rights of the Child (UNCRC), the IASC Minimum Operating Standards on PSEA, and German and international safeguarding laws. It seeks to institutionalize safeguarding within SGMA's culture, leadership, staffing, and programming, and to continuously monitor and improve mechanisms for prevention, detection, and response.

SGMA understands that protecting children is not just about avoiding harm but about creating environments where children thrive, are empowered to speak up, and are actively involved in their protection. A strong safeguarding culture strengthens SGMA's operational effectiveness and trust among communities.

#### **2. Scope**

This policy applies to all SGMA personnel and affiliates, including:

- Board members and senior leadership,
- All staff (including part-time, temporary, and field-based employees),
- Volunteers, interns, and medical professionals,
- Contractors, suppliers, drivers, and security personnel,
- Partner organizations, including subcontracted NGOs,
- Visitors, donors, and media representatives present at SGMA sites.

The policy governs all SGMA-related activities, services, projects, and digital platforms in every location SGMA operates. It is binding regardless of employment status or contractual arrangement. Non-compliance will be treated with utmost seriousness and appropriate disciplinary measures.

#### **3. Definitions**

To ensure clarity, SGMA adopts internationally recognized definitions:

- **Child:** Any individual under the age of 18.
- **Safeguarding:** Actions taken to promote the welfare of children and protect them from harm, including proactive efforts to identify and address potential risks.
- **Abuse:** Any act or failure to act that results in actual or potential harm to a child.
- **Neglect:** Failure to meet a child's basic physical, emotional, or educational needs.
- **Exploitation:** Using a position of power or access to obtain sexual or financial benefit from a child.
- **Sexual Exploitation and Abuse (SEA):** Any sexual activity with someone who is unable to give consent or in exchange for aid, protection, or services.

- **Harassment:** Unwanted conduct affecting the dignity of women, men, or children in the workplace or other environments, including psychological, verbal, or physical abuse.

#### 4. Legal and Normative Frameworks

SGMA is guided by:

- UN Convention on the Rights of the Child,
- German Child Protection Law,
- European Union Directives on child safety and victims' rights,
- OECD DAC recommendations on safeguarding,
- Inter-Agency Standing Committee (IASC) guidelines on PSEA.

These frameworks provide the normative basis for SGMA's safeguarding system and ensure alignment with international humanitarian and development standards.

#### 5. Risk Assessment and Mitigation

All SGMA programs must undergo child protection risk assessments:

- Analyze the specific risks to children in each context,
- Include mitigation strategies in program design,
- Monitor and update assessments at least every six months,
- Involve communities in identifying risks and prevention methods,
- Document and incorporate findings into safeguarding registers.

This approach ensures that all programs, even in emergency settings, are designed with safeguards from inception.

#### 6. Recruitment and Human Resources

SGMA will:

- Require all applicants to declare previous convictions or disciplinary action related to child abuse or SEAH,
- Include behavioral interview questions related to safeguarding,
- Check references with a specific focus on conduct around children,
- Include safeguarding obligations in employment contracts,
- Suspend staff facing credible safeguarding allegations pending investigation,
- Provide all staff with job descriptions that include safeguarding responsibilities.

#### 7. Training and Awareness

SGMA will provide:

- Initial training on child protection and PSEA to all staff,
- Annual refresher training and role-specific guidance,
- Training materials in multiple languages and accessible formats,
- Community-based safeguarding training for local leaders,
- Sessions on power dynamics, boundary setting, and respectful behavior,
- Digital training modules for remote staff.

#### 8. Safe Programming

SGMA will:

- Design activities with clear procedures to prevent child harm,
- Avoid solitary interactions between staff and children,
- Use informed consent forms and age-appropriate language,
- Maintain safe physical environments (e.g., separate toilets for boys and girls),
- Assess all outreach, mobile, and telemedicine initiatives for child protection compliance,
- Require child-friendly codes of conduct in youth-focused programs.

## **9. Participation of Children and Communities**

SGMA recognizes that:

- Children have the right to express their views freely in all matters affecting them,
- Child protection strategies must be informed by children's voices,
- Community involvement enhances trust and reporting likelihood.

SGMA will:

- Consult children in program design,
- Establish youth advisory groups,
- Use participatory tools for safe feedback (drawings, storytelling, etc.),
- Build local capacity to support child protection,
- Ensure inclusive participation of marginalized children (e.g., children with disabilities).

## **10. Reporting Mechanisms**

SGMA maintains:

- Anonymous, child-friendly, and accessible complaint mechanisms,
- Designated safeguarding officers at all sites,
- Protocols for immediate action if a child is at risk,
- Multiple channels for reporting: verbal, written, digital, or third-party,
- Assurance that all reports are taken seriously and treated confidentially,
- Use of external ombudspersons where needed.

## **11. Investigation Procedures**

- Reports are logged in a secure case management system,
- Trained investigators lead the process,
- All parties are interviewed respectfully and confidentially,
- Findings are documented and shared with decision-makers,
- Protective measures are applied throughout (e.g., relocation, legal support),
- Support persons are assigned to accompany survivors during investigations.

## **12. Response and Remedies**

SGMA will:

- Offer medical and psychological support to survivors,
- Assist with relocation, education continuity, and reintegration,
- Work with child protection authorities when appropriate,
- Maintain a referral database of services,
- Apply disciplinary action up to and including dismissal and legal prosecution,

- Ensure survivors' dignity and agency throughout the process.

### **13. Partner Obligations**

- All partner MoUs must include safeguarding clauses,
- Partners must demonstrate internal safeguarding capacity,
- SGMA reserves the right to audit partner practices,
- Joint response protocols are agreed at project onset,
- Violations by partners result in suspension or contract termination,
- Safeguarding training must be provided to partner staff.

### **14. Documentation and Data Protection**

- Child information must be collected with consent and stored securely,
- Access is limited to authorized personnel only,
- No identifiable information is published without guardian permission,
- All electronic data is encrypted and backed up regularly,
- Visual content guidelines prevent exploitation or risk to children,
- Records are kept for at least five years unless legal exceptions apply.

### **15. Oversight and Accountability**

- The Safeguarding and Ethics Committee monitors compliance,
- Safeguarding reports are reviewed quarterly,
- SGMA's Board receives annual safeguarding summaries,
- Independent audits are conducted every two years,
- Staff performance includes safeguarding evaluation criteria,
- Corrective action plans are required following major incidents.

### **16. Continuous Improvement**

SGMA commits to:

- Reviewing this policy annually,
- Conducting after-action reviews after every serious incident,
- Integrating learning into strategy and operations,
- Publishing anonymized case summaries to foster sector-wide learning,
- Hosting stakeholder roundtables for feedback,
- Engaging in external peer reviews with other NGOs.

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**Approved by the SGMA Board of Directors on: 01.01.2025**

**To be reviewed annually by the Safeguarding and Governance Committees.**