



# ERGO Network Safeguarding Policy

*Keeping ERGO Network staff, volunteers, members, partners and our target groups safe.*

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## 1. Introduction

ERGO Network was set up to achieve its vision of equality, social and political participation of Roma in all spheres of life in all European societies, so that the Roma are able to live a decent life free from antigypsyism, poverty and social exclusion.

It works towards this vision by mobilizing and connecting grassroots, national and international organisations and individuals who share a set of core values to create the courage, capacity and opportunities to:

- Combat antigypsyism and Roma poverty;
- Strengthen Roma civil society participation in decision-making at grassroots, national and European level;
- Commit governments and European institutions to effective social inclusion and anti-discrimination policies, standards, and funds for Roma.

We support grassroots activists to influence policies that concern them and to pro-actively advocate for more equality for Roma from a human rights perspective, thereby taking ownership of the process of change. While we see the responsibility for fighting antigypsyism primarily with majority society, we take a pro-active role in raising awareness and proposing ways to combat antigypsyism. ERGO Network has unique experience on Roma issues on local, regional, national and European level and functions as a centre of expertise on EU policies affecting Roma – both those directly targeted at Roma as well as mainstream policies.

This Safeguarding Policy includes specific other ERGO Network policies, notably the ERGO Network Work Regulations for staff and the Transparency and Accountability Criteria, outlining ERGO Network and its members' quality and ethical standards for governance, financial management and performance.

The ERGO Network Board has overall responsibility for Safeguarding. The day to day management of Safeguarding is delegated to the Safeguarding officer (Christine Sudbrock, [c.sudbrock@ergonetwork.org](mailto:c.sudbrock@ergonetwork.org)), who is supported by the Safeguarding working group.

When talking about “ERGO Network activities” in this safeguarding policy, this includes all work that is either organised directly by ERGO Network, or that is supported by ERGO Network, e.g. through official partnerships or funding.

## 2. What is safeguarding?

Safeguarding means promoting and protecting people's health, wellbeing and human rights, and enabling them to live free from harm, exploitation and abuse. A safeguarding approach means identifying and minimising the risk of harm to children and adults at risk from staff, representatives and partners through ERGO Network's activities and includes responding appropriately to any

safeguarding concerns about children and adults at risk within communities where we work. It entails a wide potential range of policies, procedures and activities seeking to address safety and wellbeing.

In ERGO Network's case, a safeguarding approach means minimising the risk of harm, exploitation or abuse of children and adults from ERGO Network representatives, members, partners or programme activities. Everyone has the right to stay safe from physical and mental harm in all activities carried out by or with ERGO Network, including in the staff, during activities with members and in activities on grassroots level.

It is known that people in vulnerable communities, such as the Roma, may be at particular risk of harm, exploitation and abuse. While ERGO Network itself does not organise activities with children, many of our members do, and we are aware that children – and again especially children from vulnerable communities - are in particular need of protection based on the UN Convention on the Rights of the Child.

### 3. Purpose and commitment

The purpose of this policy is to ensure that ERGO Network activities are implemented in a safe and protective environment where rights and autonomy are promoted; harm, exploitation and abuse are effectively prevented; and any misconduct is responded to effectively.

ERGO Network and its members recognise that all people are born free and equal in dignity. We are sensitive to the moral and personal values, religions, customs, traditions, and culture of the communities we serve. We do not violate human rights and are honest and truthful in our dealings with people whom we aim to empower, donors, staff, members and partners, governmental institutions and the public in general.

Especially in a society where Roma children and adults experience discrimination and abuse on a daily basis and are very often in very vulnerable situations, we have absolutely no tolerance towards abuse of any kind in our own activities. People targeted by our work should feel comfortable and confident. It is ERGO Network's responsibility to promote the wellbeing of Romani people and we are committed to practice what we preach.

The policy has three specific objectives:

1. Keeping children and adults safe;
2. Ensuring the highest standards of behaviour from representatives and minimising the risk of abusers entering the organisation
3. Safeguarding the reputation of ERGO Network, including guarding ERGO Network representatives from false allegations or from operating within an unclear framework.

ERGO Network is committed to taking all necessary measures to ensure the safety of all children and adults involved. There is no place for physical, sexual and/or emotional violence in any form, nor for discrimination based on any grounds.

In any activities involving children, the primary consideration should be given to children's rights, following the principles of the UN Convention on the Rights of the Child (CRC), namely, the "best interest" of the child, the child's right to life and development, the child's right to be heard/participate, and the child's right to non-discrimination.

In all activities involving adults who are at additional risk because of disability, age, gender, sexual orientation, or other circumstances and/or status, ERGO Network will be guided by the human rights principles of respect for dignity, autonomy, independence, choice, non-discrimination and equality.

This policy covers the safety of all staff (including interns), volunteers, members, external partners and beneficiaries.

## 4. Principles of safeguarding

ERGO Network is committed to key principles that should underpin all safeguarding functions. These principles are relevant for both child and adult safeguarding.

- **Empowerment.** People being encouraged and supported to make their own decisions and give informed consent, including through supported decision-making mechanisms. An enabling approach to risk assessment is used which promotes autonomy.
- **Prevention.** It is better to take action before harm occurs.
- **Proportionality.** The least intrusive response appropriate to the risk presented.
- **Partnership.** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- **Accountability.** Accountability and transparency in delivering safeguarding.

## 5. Code of Conduct

All ERGO Network representatives are required to understand their responsibility to keep adults and children safe and to sign and abide by the ERGO Network Code of Conduct, which lists acceptable and unacceptable behaviour, primarily designed to safeguard others. It also serves to guard the name and reputation of ERGO Network and its representatives from false accusations. All staff are responsible for encouraging and promoting the implementation of the Code of Conduct.

The adherence to this code is mandatory for all ERGO Network representatives. Any violation of the Code of Conduct will result in disciplinary procedures in addition to any relevant legal action.

This guidance will not only help to protect children and adults but will also help all ERGO Network representatives to identify any practices which could be mistakenly interpreted and perhaps lead to false allegations of abuse being made.

If in doubt, you should always consider how an action or activity may be perceived as opposed to how it is intended.

The following gives an overview of desired behaviour – it is more described in detail below:

- We actively ensure that people of all genders, ages, religions, ethnicities, races, sexual orientations, social statuses and political opinions feel welcome in ERGO Network and communicate clearly and regularly that discrimination has no place in our network.
- We provide a space where everyone can feel safe and does not have to fear unwanted sexual behaviour in any way.
- We put high emphasis on ensuring safe spaces for minors in the activities of our network.
- We value shared decision-making, are aware of power structures and make sure that positions of power are never abused.

## 5.1 Discrimination, violence and harassment

*The purpose of ERGO Network's existence is to fight for equality for Roma. At the same time, ERGO Network stands for non-discrimination on any ground and upholds the value of equality for all. We actively ensure that people of all genders, ages, religions, ethnicities, races, sexual orientations, social statuses and political opinions feel welcome in ERGO Network and communicate clearly and regularly that discrimination has no place in our network. We ask participants whether they need any accommodations in advance of activities and are mindful of everyone's needs. We ensure that activities are organized in neighbourhoods where participants can feel safe.*

ERGO Network opposes all forms of harassment, violence, bullying, discrimination, or any similar harmful behaviours and has a zero-tolerance policy for such behaviours. No single person or group, regardless of gender, gender identity, gender expression, age, ethnicity, race, religion, sexual orientation, social status, political opinion, or functional variation may be discriminated against.

This goes from individual jokes made on behalf of others' characteristics, to harassment and violence.

Harassment is a form of abuse that can be external or internal to the activities of ERGO Network, occurs over a certain period of time and has the aim or the effect of harming the personality, dignity or physical or psychological integrity of a person attending ERGO Network activities or an employee whilst carrying out their work. Harassment thus poses a threat to their work. Harassment creates an intimidating, hostile, degrading, humiliating or offensive environment and manifests itself through words, intimidation and unilateral acts, gestures and written materials.

Violence is understood to be any situation in which a person is threatened or is physically or psychologically attacked whilst representing or attending an ERGO Network activity.

## 5.2 Sexual harassment, abuse, and sexual exploitation

*In ERGO Network, we provide a space where everyone can feel safe and does not have to fear unwanted sexual behaviour in any way.*

No individual shall in any way be subjected to sexual harassment, whether in physical or mental form. It can involve touching, groping, jokes, suggestions, glances, and images that are sexually evocative and devaluing. Sexual harassment can take the form of verbal, non-verbal or physical conduct of a sexual nature that is unwanted and designed to harm the dignity of a person or to create an intimidating, hostile, degrading, humiliating or offensive environment. It is the victim who decides whether the behaviour is unwelcome.

All forms of sexual abuse and exploitation are prohibited, as are all forms of sexual or other inappropriate contact between adults and children. It is unacceptable to exploit a person or group in a situation of vulnerability.

## 5.3 Alcohol and drugs

*ERGO Network regularly organizes activities where we get together with fellow activists and policy-makers to network and to celebrate our achievements. Alcohol is permitted during these events.*

However, it is important that alcohol consumption is moderate. ERGO Network will never offer or pay for hard alcohol and will not encourage participants to buy their own hard alcohol. ERGO Network will limit paying for two glasses of beer or wine per person during a dinner. Everyone must be aware of their levels of alcohol tolerance and not drink so much that their behaviour is impacted by alcohol consumption. Carrying out activities on behalf of ERGO Network while under the influence of alcohol could risk the reputation of the organization and lead to an erosion of trust and respect from colleagues and partners.

An 'alcohol relationship' must not be developed within the framework of ERGO Network's activities. Meetings and decisions must not be moved to the pub or similar establishments that would discourage others from joining. When on trips on behalf of ERGO Network, you should restrict your alcohol consumption during your leisure time in line with your responsibility as a representative of the network. Alcohol consumption is strictly forbidden when driving and, as a passenger, you should always ask another person to drive if you suspect that the designated driver is under the influence of alcohol.

All forms of involvement with and consumption of substances classified as illegal narcotics are prohibited during ERGO Network activities. Exceptions are made if the substances relate to prescription medicine for personal use.

## 5.4 Improper use of position of power

*ERGO Network has a relatively flat management structure and values shared decision-making. We recognize, however, that also in ERGO Network different people hold different levels of power.*

A position of power must never be used improperly for someone's own benefit or at the expense of others. A position of power must not be used to give anyone advantages they would not normally have enjoyed. Conduct and relations shall be carried out in such a way that there can never be a perception that different benefits are expected or required.

## 5.5 Child protection

*All children are in need of special protection. Especially Roma children are often faced with abuse because of their particularly vulnerable situation. We put high emphasis on ensuring safe spaces for minors in the activities of our network. As per United Nations definition, children are all people under 18 years of age.*

In order to prevent child abuse, the following behaviour is expected from adults in activities where children are present:

- An adult should never be alone with a child (unless they are their parent or guardian). At all times, they should be close enough to another adult to be within sight and hearing range. If circumstances require that they should be alone with a child then they should ensure that another adult has agreed to this course of action, knows what they are doing and how long it will last.
- Adults must listen carefully to any child who tells them (sometimes through drawings and behaviour as well as words) that they are being harmed. They must tell the child that they cannot keep this information secret, and this must be passed on to the person at ERGO Network who is responsible for safeguarding and can make sure action is taken to protect the child. This then must be discussed as soon as possible with the designated safeguarding officer.
- Adults must not engage in any activities that can be considered as part of grooming. This is the process in which an adult builds a relationship with a child to gain the child's trust for the purpose of sexually abusing and/or exploiting the child. This can include:
  - favouring the child over others, providing it with privileges;
  - isolating it from others;
  - befriending the parents or caretakers who are responsible to protect the child with the intent to gain access to the child;
  - providing the child with alcohol or drugs;
  - building intimacy;
  - threatening, blackmailing, intimidating or scaring a child with negative consequences.
- Any sexual activity by an adult over the age of 18 with an individual under the age of 18 is strictly forbidden, even if it is considered consensual.

## 5.6 Information and data management

Information and data management are essential tools for ERGO Network. Adherence to GDPR is key to be able to guarantee the integrity of our employees, members, and partners.

ERGO Network strives to be open and transparent regarding our operations and financing. This means proactively sharing timely, accessible, relevant, and clear information about the organisation and its activities, as well as answering requests for information.

There are times when it is inappropriate to disclose information. Disclosure of sensitive information, including personal information of staff, members and participants, risks seriously compromising the security of employees, members and partners, compromising ERGO Network's effectiveness, and damaging our credibility. Discretion is therefore expected, and sensitive information must not be disseminated. Information that has not been made public and that is known to you because of your position may not be used for private benefit or disclosed further. It is understood that this does not affect the exchange of information among colleagues that is necessary for ERGO Network's operations.

## 6. ERGO Network Transparency and Accountability Criteria

All ERGO Network staff and its member organisations are required to understand their responsibility to keep adults and children safe and to sign and abide by the [ERGO Network Transparency and Accountability Criteria](#) (Annex 1), which lists what behaviour ensures that performance, governance and financial management comply with our values.

## 7. ERGO Network Staff Working Regulations

Besides this safeguarding policy, ERGO Network staff is additionally covered by the Staff working regulations. They detail prohibited behaviour and sanctions as well as prevention of psychosocial risks and discrimination at work. The work regulations can be obtained from the ERGO Network secretariat. An acknowledgement of their receipt must be signed by each staff member.

## 8. Measures to implement the policy

The safeguarding policy requires the following steps for its implementation.

- **Prevention measures** including awareness-raising, training of staff, volunteers and ERGO Network members, risk analysis, recruitment procedures, induction of staff in the policy, adherence to ERGO Network's code of conduct and its transparency and accountability criteria and incorporation of the policy into relevant existing systems including in project meetings with partners when projects are being initiated.
- **Reporting and responding measures** including steps for alerting and reporting safeguarding concerns, investigation and incident management, duties and responsibilities of assigned managers.

- **Implementing and maintaining the policy**, including training and capacity building of staff and partners, monitoring, reporting and review of the policy.

## 8.1 Prevention measures

### 8.1.1 Recruitment

ERGO Network staff and volunteers are recruited based on an openly advertised job profile that includes necessary and desirable competencies and requirements. For each position, a selection committee made up of the Director, other staff and a Board member is set up. Conflicts of interest of selection committee members must be disclosed in advance. If a conflict of interest exists, the person should disclose the conflict of interest and eventually step out from being on the selection committee.

When recruiting staff, ERGO Network makes sure that questions regarding safeguarding are included in any relevant job interviews. References are sought from previous employers or other persons who are professionally acquainted with the candidate to get more information on the suitability of candidates in terms of safeguarding. All new hires are required to acknowledge receipt of and compliance with the safeguarding policy and the working regulations prior to their employment. Existing staff who have not yet acknowledged receipt of and compliance with the safeguarding policy are also required to do so.

For staff who come in contact with children, a criminal records check is required.

The induction process of new staff includes an introduction to the safeguarding policy and code of conduct and an explanation of procedures to follow should any safeguarding concern arise.

Also, Board members are required to acknowledge receipt of and compliance with the safeguarding policy prior to the start of their term.

### 8.1.2 Admission of new member organisations

Safeguarding is an important part in the admission of new member organisations. Members are required to adhere to ERGO Network's Transparency and Accountability criteria and acknowledge their willingness to follow ERGO Network's safeguarding policy in ERGO Network events and projects. Membership application documents must also include a copy of the organisation's own safeguarding policy. In case no such strategy is available, the organisation must commit to develop their own safeguarding policy within one year or adapt ERGO Network's safeguarding policy for use at local level within the first year of membership.

### 8.1.3 Awareness

ERGO Network's Safeguarding officer has the responsibility of building internal awareness and supporting relevant capacity development of the network in safeguarding. All ERGO Network representatives and partner organisations are duly notified of the Safeguarding Policy and made aware of how they are expected to comply with it before joining the organisation. It is the responsibility of all ERGO Network staff to share the policy and approach as relevant with their project partners.

Before ERGO Network events, the safeguarding policy, the contact details of the safeguarding officer and the form to be used for reporting of safeguarding concerns and/or misconduct are shared with all participants. The safeguarding policy, the importance of safeguarding and the name of the designated event safeguarding focal point (the safeguarding focal person assigned to cover that specific event) are also mentioned in introductory sessions of training and networking events.

ERGO Network ensures all supporters, donors, sponsors, and media representatives involved with ERGO Network's work have access to the Safeguarding Policy through its website and takes appropriate steps to communicate that availability.

#### **8.1.4 Risk analysis**

When working with partners, ERGO Network endeavours to ensure that the programmes it supports are safe for the adults and children they serve. To ensure that the appropriate safeguarding measures have been put in place, ERGO Network works with the partner, either during the project development process, or the inception phase, to carry out a safeguarding risk analysis which identifies any safeguarding issues and propose actions to mitigate the identified risks, prior to the activities taking place.

Such risk analysis is an integral part of project proposals, programme planning guidelines, and partnership assessment tools.

## **8.2 Reporting and responding to incidents**

This section outlines clear procedures for reporting safeguarding concerns, also detailing definitions of the various forms of harm and misconduct that are covered by this policy in order to better identify safeguarding incidents and detailing how the organisation will respond and who will be involved.

### **8.2.1 Confidentiality and storage of information**

For each safeguarding incident, a report log is filled and stored securely by the Safeguarding Officer. The information therein is used for a bi-annual report to the ERGO Network board. All reports and the information therein are handled with the strictest confidentiality to protect the identity of the

individuals concerned, the victim and alleged perpetrator both appropriately and in accordance with relevant national legislation, including the GDPR.

## **8.2.2 Forms of harm and misconduct**

Incidents that fall under the following safeguarding procedures are described in more detail in the code of conduct above. The following list defines types of abuse covered:

- Physical abuse: Intentional injury, in any form and of any intensity, to bodily integrity or health by striking, grabbing, pushing, slamming, pulling hair, stabbing, cutting, burning, strangling, biting, poisoning, intoxication, or other actions with similar effect.
- Emotional abuse: Imposition of will or personal control; provocation of mental suffering (such as through demeaning, insulting, nicknames, blackmail); involvement in personal life; dispossession of identity documents; intentional deprivation of access to information.
- Exploitation: Exploitation refers to using a person for economical or sexual benefit, for gratification or profit, resulting in unjust, cruel and harmful treatment of the person.
- Sexual abuse: Any unwanted sexual conduct and sexual conduct that is meant to degrade or harm.
- Neglect: The persistent failure to meet a child's basic physical and/or psychological needs (covered in law under 'psychological violence').
- Online abuse: Abuse and exploitation that takes place on the internet. Children and vulnerable adults can be at risk from people they know and strangers. It might be part of abuse taking place offline or just take place online. It can include grooming, cyberbullying, sexting, sexual abuse and exploitation, trolling, threatening, fake profiles etc.
- Harmful practices: Practices that may be more acceptable in parts of society, but which are harmful to the victims. Examples include gender-based violence, FGM, the worst forms of child labour, and violent discipline.

## **8.2.3 Procedures to be followed in case of violations of the code of conduct by participants in activities, events or meetings**

For violations of the code of conduct during events or other activities by individuals participating, violations can be reported via an online complaints form which is available as an annex to this policy, on the ERGO Network website and that is circulated to all participants before and after activities.

If an ERGO Network representative observes an incident where harm was caused to anyone during or through an ERGO Network activity, they have the responsibility to report this incident directly to the Safeguarding Officer or by using the complaints form.

In the case of witnessing or having received a report of any written, non-verbal or verbal violent or discriminatory behaviour, conduct or discourse, the Safeguarding Officer or Event Safeguarding Officer for the meeting, together with the ERGO Network Director, may respond using their best judgment and depending on severity of the action with the following actions:

1. Remind participants of their obligation to act in accordance with the code of conduct.

2. Have a one-to-one conversation with the person to make sure that there is an understanding of the inappropriate action.
3. Engage with the person to explain and ask for an apology and/or retraction.
4. Suspend the session and/or ask the person to leave the meeting, event or activity. If the person refuses to leave, they can be ejected from the meeting online or escorted out. An alleged abuser should be suspended from ERGO Network activities until the investigation is closed.
5. In the case of violent or discriminatory behaviour, conduct or discourse that is physical in nature, immediately suspend the activity, ensure that the venue is safe for all participants and all concerned parties are in discrete locations and, if necessary and wanted by the victims, contact the police according to the laws of the country.

If the complaint is received after the event, then the Safeguarding Officer, together with the ERGO Network Director, will review the complaint and have conversations with those affected and the person about whom the complaint was made. If the code has been deemed to be breached, depending on the severity, actions can include:

1. Informing the persons involved that their behaviour is in breach of the code of conduct and reminding them of the code of conduct. Informing that a future breach of the code of conduct will lead to being immediately expelled.
2. Ask the person to apologise to the person or group who made the complaint, if this is requested by the victim(s).
3. Temporarily banning them from attending meetings or activities.
4. Banning this individual from attending any meetings or activities in the future.
5. Reporting the breach to the person's employer or their member organisation, if relevant.
6. Request the member organization to follow up with disciplinary actions and reporting about it to ERGO Network.

In cases where mediation is necessary between the parties, the Safeguarding Officer will endeavour to provide mediation on a good faith basis and in line with the principles of this Safeguarding Policy. The Safeguarding Officer can also facilitate mediation by a professional mediator. The complainant may request an apology or other remedy mentioned above, if that step has not already been taken. Complainants should be informed of steps taken, in line with any confidentiality considerations.

ERGO Network will treat all allegations fairly and honestly and the investigation will be conducted in a timely, fair and confidential manner. This means that until such time as allegations are confirmed, the right of the alleged abuser to confidentiality will be protected. ERGO Network recognizes the importance of such confidentiality as false reports could cause immense harm or even risk to the person accused of abuse.

#### **8.2.4 Procedures to be followed in case of violations of the code of conduct by ERGO Network representatives**

Violations of the code of conduct or any suspicion of such shall be reported to the Safeguarding Officer (or to the Director, if the Safeguarding Officer is concerned), who are required to investigate the matter and act accordingly. Given that information regarding violations may be sensitive, information shall

always be handled with care, both by the person providing the information and by the person receiving it.

It might not always be clear what is a breach of the code. If this is the case, those covered by the code of conduct are encouraged to consult ERGO Network employees or relevant members of the Board for advice. An active and open dialogue is essential.

The code of conduct is an integral part of all the agreements signed by ERGO Network. This means that ERGO Network can take contractual action in the event of a breach. Violations may result in disciplinary sanctions, the most extreme effect of which is dismissal or the end to a contract.

Staff may incur the following disciplinary sanctions: a verbal warning, a written warning, or a layoff of one or more several days without remuneration or compensation, or the termination of the employment contract for serious grounds.

The employer chooses the sanction which it considers appropriate, taking into account the seriousness of the misconduct or its repetition.

Workers who consider they have suffered psychological damage, whether or not accompanied by physical damage, as a result of psychosocial risks at work, in particular violence, bullying and / or sexual harassment at work, can at any time turn to the employer, a member of management / of the hierarchical line or a member of the Board (if applicable) or of the union delegation. The employer and the members of the hierarchical line will hear the worker and, if they consider it necessary, will take the necessary measures to avoid or at least limit the damage. The detailed provisions for prevention of psychosocial damage are described in the staff working regulations (Art. 17.4).

### **8.2.5 Protection of survivors of abuse**

Guided by the country specific child protection policy, the Safeguarding Officer shall take all necessary immediate and long-term action to protect the abused child from further harm as the case is being handled or investigated, and oversee the plan for rehabilitative care. Immediate services among others include: medical care, examination and/or prophylaxis treatments, counselling, ensuring the child is in a place of both physical and psychological safety, disclosure to family, family tracing, maintenance of legal evidence, legal aid, and referral for other services not provided by ERGO Network or its members/partners. ERGO Network or its members/partners will aim to cover immediate services to the abused child. Rehabilitative care and support will involve follow up psycho-social, health, legal and alternative care. ERGO Network or its members/partners will work with existing social services to ensure this care for the abused child, and will contribute to the extent possible to the costs of such care.

In the case of adults, services should be proposed to the survivor of abuse, such as medical care, counselling, legal aid, and referral to other services. ERGO Network or its members/partners will aim to cover support services to the extent possible. The safeguarding officer should seek professional advice on how best to support adult survivors of abuse.

## 8.2.6 Communications

In terms of communications, ERGO Network faces safeguarding risks when images of people, as well as their homes and belongings, are taken and used in online and offline publications and social media. ERGO Network is committed to adhering to ethical guiding principles on communications to minimise the risks of people misusing photographs and related information beyond the agreed purpose and consent. The best interests of the featured adult or child are to be safeguarded as a primary consideration. This must be the case when ERGO Network representatives themselves use images, as well as when journalists and photographers have access to children and vulnerable adults through ERGO Network. To this effect, ERGO Network representatives and partners abide by the following guidelines.

- All interviews and images of adults and children are undertaken with sensitivity to safeguard the individual's rights to dignity, identity, confidentiality, and privacy. Individuals are prepared for interviews prior to being interviewed. In the case of children, a parent or guardian is present during interviews, where appropriate, or their permission sought beforehand for a professional adult with agreed responsibility (such as medical or educational professionals) to be present on their behalf.
- Children and vulnerable adults are encouraged to give their own accounts as much as possible rather than having others speaking on their behalf.
- Children are engaged in their own protection through awareness raising about how to keep themselves safe online and in the use of mobile phones.
- Children and vulnerable adults are accurately represented through words and images. Their portrayal is not manipulated or sensationalized in any way but rather, provides a balanced depiction of their lives and circumstances. Degrading, victimizing or shaming images and text are avoided.
- Pictures of adults and children are decent and respectful and should not stigmatise the community, family or the individual. Children should wear decent clothing appropriate to the local custom.
- Prior consent to use information collected in interviews and/or images of adults and children is obtained from the individual themselves (if they possess the maturity to do so), and in the case of children, consent must also be obtained from their parents and/or guardians. To help keep adults and children safe, consideration is given to how much information is published. A consent form for adults and an assent form for children are annexed to this policy.
- In all circumstances without exception, full measures must be taken to protect the identity of children involved in any communication. Information that may be used to place them at risk will not be included in communications or on websites.
- Before images of children are published on a web site, they should 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.
- Any complaints or concerns about inappropriate or intrusive images should be reported and recorded like any other child protection concern.
- Journalists and other persons seeking to document information about children who take part in activities of ERGO Network or its members and partners, or who live in locations visited together with ERGO Network and its members and partners, shall seek permission from

management, be accompanied and supervised by a designated officer. While they document children's information they shall observe the values of dignity, confidentiality, and informed consent of children and/or their parents or guardians.

- ERGO Network will not use unknown photographers or filmmakers who have not been checked properly.
- Photographers and filmmakers should not be allowed to spend time with or have access to children without supervision.
- Pictures, materials and personal information regarding individuals will be held in a secure database and according to the ERGO Network privacy policy. The misuse of images accessed will be treated in the same way as other breaches of this policy. Applicable data protection laws for all stored images will be followed.

## 8.3 Implementing and maintaining the policy

### 8.3.1 Roles and responsibilities for safeguarding within ERGO Network

Although all staff have a responsibility for safeguarding, there are a number of specific roles within ERGO Network, which exist to support, advise and refer any concerns to the authorities should this be necessary.

- The Safeguarding Officer will
  - be responsible for ensuring ERGO Network's Safeguarding policy and procedures are regularly reviewed and kept up-to-date.
  - Promote the importance of safeguarding across the organisation
  - Manage allegations or concerns about abuse against ERGO Network representatives together with the ERGO Network Director
  - Ensure mechanisms are in place to communicate and raise awareness about safeguarding issues.
  - Keep the ERGO Network leadership up to date on safeguarding issues, providing reports and monitoring information on an annual basis.
  - Co-ordinate the safeguarding working group and ensure that it meets at least once a year to review safeguarding issues.
  - Ensure that back-ground checks for new staff and volunteers are conducted and, if relevant, police reports are sought.
  - Contact statutory services when appropriate.
  - Ensure incidents are dealt with and reported appropriately.
  - Collect monitoring data on all safeguarding concerns raised, their management and outcome in order to check compliance and note any lessons learnt.
  - Evaluate the effectiveness of safeguarding within the organisation and ensure records of any concerns reported are maintained and stored securely.

ERGO Network's Safeguarding officer is: Christine Sudbrock, [c.sudbrock@ergonetwork.org](mailto:c.sudbrock@ergonetwork.org), +32 486 046 940.

- Event safeguarding focal points will:
  - Be responsible for safeguarding issues during specific events, when the safeguarding officer is not present.
  - Be trained by the ERGO Network safeguarding officer before the event.
  - Keep record of any incidents and report back to the ERGO Network safeguarding officer.
  
- Safeguarding working group:
  - The safeguarding working group includes staff members, board members, volunteers and representatives of member organisations.
  - It meets on annual basis to review safeguarding issues and update the safeguarding policy, if necessary.

The safeguarding working group currently consists of:

- Staff representatives: Amana Ferro (senior advocacy advisor), Carmen Tanasie (policy officer), Ana Rozanova (communications officer), Gabriela Hrabanova (Director)
- Volunteer representative: Anamaria Psenkova
- Board representatives: Mustafa Jakupov, Daniel Grebeldinger, Anna Carballo
- Member representatives: Adriatik Hasantari (Roma Active Albania), Boglarka Fedorko (Romaversitas), Michal Miko (RomanoNet)

### **8.3.2 Review cycle of the policy**

This safeguarding policy will generally be reviewed annually by the safeguarding working group and signed off by the ERGO Network Board. In the first year of its implementation, a first review is foreseen after six months. The next deadline for revision is 30 June 2023. The safeguarding policy review will be informed by a safeguarding risk assessment and a verification of the extent to which all identified risks are accounted for in the policy.

### **8.3.3 Commitment**

ERGO Network’s members and partners, who implement activities with the support of ERGO Network, are obliged to follow this safeguarding policy and to adapt it to their national legislation where necessary. In case they have their own safeguarding policy, they are obliged to share this policy with ERGO Network’s safeguarding officer for review before implementing activities supported by ERGO Network.

All staff and representatives of ERGO Network shall receive and have access to a copy of this policy for reference.

All staff and Board members as well as any volunteers (no matter how long their period of service) must sign a statement of commitment to uphold ERGO Network’s safeguarding policy. Other stakeholders may be asked to sign a statement of commitment depending on their level of interaction with children (for example consultants working directly with the children). All signed statements of

commitment must be kept securely, either in the staff member’s personnel file, or in a specific file kept for safeguarding signed statements, and held under lock and key.

### 8.3.4 Training

In order to uphold its commitment to safeguarding, ERGO Network’s safeguarding officer needs to be well trained, and also other staff and members must have the opportunity to receive training and support to ensure safeguarding is taken seriously. The safeguarding officer will attend training once a year to continuously build capacity in this area of work. They will also share training materials and opportunities with colleagues and members and encourage others to improve their capacities for safeguarding.

## 9. Annexes

### 9.1 Incident report form for violations of code of conduct

This form is available [here](#) and on [www.ergonetwork.org](http://www.ergonetwork.org) and will be sent to all participants of ERGO Network activities before and after the activity.

Name:
Organisation:
E-mail address:
Where and when did the incident happen?
Please specify:
<input type="radio"/> I observed the violation of the Code of Conduct but was not directly involved
<input type="radio"/> I was engaged in a situation where the Code of Conduct was violated
Please describe the situation in detail:

## 9.2 Child abuse incident reporting form

This form is to be used for any case where a child's safety is at risk or in danger, or where child abuse is either suspected or known. Please give as much information as possible to the best of your knowledge. You can fill this form before talking with the Safeguarding Officer, or you may wish to discuss it with him/her first. All information will be treated with confidentiality, but in certain cases, there will be the obligation for staff and others to report concerns to the appropriate external body (e.g police). This would normally be done as a consequence of filling this form, but if urgent action is required in order to protect a child, then it may be before the reporting procedure.

### Details of this report

Date of report ..... Time of report .....  
Is this report a concern for more than one child (please tick)? Yes / No  
If yes, how many other children are of concern? .....  
.....  
(a separate form must be filled out for each child)

### Details of the person making the report

Full Name .....  
Job title/position at [Organization name]: .....  
Contact details: Address/phone: .....

### Details of the Safeguarding Officer who received this report

Full Name: .....  
Job title/position at [Organization name]: .....  
Contact details:  
Physical address: .....  
.....  
Telephone numbers: ..... Mobile: .....  
Office ..... Email: .....

### Details of the child

Full name: .....  
Age/date of birth (if known): ..... Sex: Male/ Female  
Does this child have a disability? Yes/No If yes, type of disability:.....  
Are you reporting a sexually transmissible infection for this child ? Yes/No  
Current residence of the child: .....  
Is the child aware of this report? Yes / No

### Details of the child's parents/carers (if known)

Full Name: .....  
 Contact details / Telephone .....  
 .....  
 Relationship to child/children:.....  
 Is the parent/carer aware of this report? Yes / No

**Details of the person/s alleged to be responsible for the abuse**

Full Name: .....Age:.....  
 Contact details: .....  
 .....  
 Relationship to child:.....

**Reasonable belief**

Have you formed a belief, on reasonable grounds, that child abuse has occurred? Yes/ No  
*Please provide details of the grounds for your belief, and that the child/children in this report has/have been the subject of abuse or is/are the subject of ongoing abuse. On the report below, please provide as much information as possible, as this will assist with the assessment of the child/children's safety.*  
 Is it your belief that the child/ren are still in an 'at risk of further abuse' situation? Yes/ No

**Detailed Report**

Record as much information that you know about the suspected incident. Please use as much space as you feel necessary to give a full account of the incident.

Name of Child	
Date and time of the alleged abuse/incident	
Exact location of the incident:	
Name of person who reported the incident to the Safeguarding Officer date/time.	



	Behaviour
--	-----------

<p>Record what actions were taken to care for the child immediately after the incident.</p> <p>Was the child referred for care? Where?</p>	
--	--

<p>Record what immediate actions were taken to protect the child from further risk or trauma.</p>	
---	--

<p>Record what immediate actions were taken to protect and care for witnesses or any other children and staff in the area at the time of the incident.</p>	
<p>Has the incident been reported to the authorities/police?</p>	
<p>If yes, give details: If unsure of whether to report this issue or not, discuss this with the safeguarding officer.</p>	

What actions are being taken to care for and supervise the perpetrator of the abuse?

Are they in a situation where other children are being placed at risk?

If the perpetrator is also a child beneficiary of [Organization name] a separate form must be completed for this child – has this been done?

Please describe the long-term follow-up care plan for the child.

Please describe the long-term follow-up care plan for the perpetrator.

Name/signature/date and contact of person writing this report:

### 9.3 Consent form for use of images (adults)

#### **Consent for use of quotes, photographs, and videotaped images**

Except for the restrictions listed below, we give permission to [organisation(s)] to use my photograph, videotaped images, and quotes or information gathered during the activity or event in documents, published materials, and electronic presentations that may help improve the quality of services for the Roma:

Printed, audio, electronic, and internet-based materials produced by [organisation(s)] for documentation and awareness-raising during the activity or event.

yes no

Printed, audio, electronic, and internet-based materials produced by other organizations who may be present at the activity or event.

yes no

Printed, audio, electronic, and internet-based materials produced by newspapers, television, radio, and other public media.

yes no

AGREED TO BY

\_\_\_\_\_  
Signature of

\_\_\_\_\_  
Print name

\_\_\_\_\_  
Date

9.4 Assent form for use of images (children)

Except for the restrictions listed below, we give permission to the [organisation] to use my child's photograph, videotaped images, and quotes or information gathered during the activity or event in documents, published materials, and electronic presentations that may help improve the quality of services for vulnerable children:

Printed, audio, electronic, and internet-based materials produced by the sponsoring organization/s for documentation and awareness-raising during the activity or event

yes no

Printed, audio, electronic, and internet-based materials produced by other organizations who may be present at the activity or event

yes no

Printed, audio, electronic, and internet-based materials produced by newspapers, television, radio, and other public media

yes no

AGREED TO BY

\_\_\_\_\_  
Signature of parent/guardian

\_\_\_\_\_  
Print name

\_\_\_\_\_  
Date