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ON THE APPROVAL OF THE SERVICE AND SUPPORT RECIPIENTS' SAFEGUARDING POLICY

PUBLIC ORGANISATION „GELBĖKIT VAIKUS“ (SAVE THE CHILDREN LITHUANIA)
SERVICE AND SUPPORT RECIPIENTS' SAFEGUARDING POLICY

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1. PURPOSE

Children and adults who receive services or support from the public organisation „Gelbėkit vaikus“ (hereinafter – Service and Support Recipients) must be protected to the fullest extent possible from intentional or unintentional acts or omissions by the Organisation's employees and representatives that could give rise to a risk of violence, exploitation, abuse, neglect, or other harm – whether in person, online, or in any other digital environment.

The duty to ensure the safety of Service and Support Recipients rests with all employees and representatives of the public organisation „Gelbėkit vaikus“ (hereinafter – the Organisation). This duty is set out primarily in this Service and Support Recipients' Safeguarding Policy (hereinafter – the Policy). Where relevant, the Policy's provisions are also incorporated into the Organisation's other internal policies, procedures, rules and descriptions, as well as into agreements with third parties.

All concerns and suspicions raised, including those relating to online safety, are handled in accordance with this Policy.

Failure to comply with the provisions of this Policy may result in:

a) direct and lasting harm to the individuals we are committed to protecting;

b) disciplinary measures against Organisation representatives, including termination of contracts or other agreements;

c) legal consequences, fines, as well as restrictions or other barriers to accessing funding opportunities;

d) loss of trust in the Organisation and significant damage to its reputation.

This Policy is reviewed at least every 2 (two) years, or whenever there is a material change in the requirements of the Save the Children International network.

2. POLICY PROVISIONS

1	**General Provision.** Effective safeguarding of Service and Support Recipients relies on our shared commitment to protecting children and communities from all forms of violence, exploitation, abuse, neglect and other harm (hereinafter jointly – Harm) arising from the Organisation's activities. We recognise that such Harm may occur both online and in person, and we are committed to reducing and eliminating it across all areas in which we operate. The standards applied by the Organisation are often higher than those required by national law or prevailing social custom; all Organisation representatives undertake to comply with them. We aim to create an environment in which any concern or question relating to the safety of Service and Support Recipients can be raised and discussed openly, and in which strengthening our internal systems and practices increases the Organisation's accountability to the people we seek to help.
2	**Children.** As an organisation belonging to the Save the Children International network and representing children's rights, we have a particular duty to ensure the safety of the children we engage with. The best interests and wellbeing of the child are our priority – taken into account when assessing the child's safety, health, family relationships, development, identity, and right to be heard, as provided for in Article 3 of the United Nations Convention on the Rights of the Child. Children are empowered to understand their rights; they are given an age-appropriate explanation of what conduct is acceptable and unacceptable, and what to do if problems or questions arise. Where a child's image, story or opinion is used in the Organisation's activities or public communications, age- and maturity-appropriate assent is obtained in advance, together with the consent of a parent or guardian; a child has the right to withhold their assent even where a parent or guardian has already given consent.
3	**Key Controls and Accountability.** The Organisation's Board and CEO are responsible for ensuring that appropriate measures to mitigate safeguarding risks to Service and Support Recipients are implemented, and that the costs of implementing this Policy are budgeted for in activity plans and budgets. Heads of department are responsible for integrating the safeguarding of Service and Support Recipients into their teams' activity plans – including appointing responsible persons, ensuring training, information and methodological support, assessing and mitigating activity-related risks, and responding appropriately to suspected breaches of this Policy.
4	**Personal Responsibility.** All Organisation representatives must demonstrate the highest standards of conduct towards children and adults in both their personal and professional lives, and must take all necessary steps – within their area of responsibility and through their own conduct, whether online or in person – to prevent Harm to those we engage with. All Organisation representatives: – understand and comply with this Policy; – complete mandatory training on the safeguarding of Service and Support Recipients within their first month of employment, volunteering or engagement, and repeat it at least every 2 (two) years thereafter; – never themselves cause Harm or create a risk of Harm to any person we engage with in our activities; – do not use their position or influence as a representative of the Organisation to cause (or encourage another person to cause) Harm; – ensure that, wherever possible, at least two Organisation representatives take part in any activity

	involving children and adult Service and Support Recipients, and that volunteers are never left alone with Service and Support Recipients; – understand the risks relevant to their area of activity and implement risk-mitigation measures relevant to their duties; – report any suspected instances of Harm or risk of Harm promptly and confidentially; failure to report is itself considered a breach of this Policy.
5	**Implementation, Monitoring and Review.** This Policy and its implementing procedures apply to all of the Organisation's programmes, projects and activities. Reporting and case-management data is reviewed at least once a year, to assess the effectiveness of reporting and response mechanisms and the risks associated with the Organisation's activities. Children and other Service and Support Recipients are informed of their right to be protected from any form of Harm and of how to report a concern. Feedback is gathered from children, guardians and the communities we work with, to assess the effectiveness of the safeguarding system.
6	**Prevention.** Heads of department ensure that safeguarding prevention measures relevant to their area of activity – including raising awareness and identifying risks – are put in place, made accessible, and clearly communicated to all Organisation representatives. Key prevention measures: – applying safe recruitment practices when engaging employees, volunteers and interns, including background checks for individuals who will work with or have direct contact with children; – applying safe partnership principles when working with Partners who have direct contact with Service and Support Recipients; – applying safe programme-planning principles – assessing risk from the activity-planning stage onward and reviewing it throughout the project cycle; – maintaining a channel for reporting observed breaches.
7	**Reporting.** The Organisation fosters an open culture in which anyone can safely and confidently report safeguarding incidents or concerns relating to Service and Support Recipients, including those arising in the digital space. Any suspected or known such case must be reported within 24 hours of becoming aware of it, unless doing so is not possible or other exceptional circumstances apply. Failure to report a known or suspected breach is itself considered a breach of this Policy. Reports may be made: – by email to saugus.vaikas@savethechildren.org; – by phone at +370 609 23776; – by completing the anonymous reporting form on the Organisation's website. Any information relating to suspected breaches of this Policy is treated as strictly confidential – known only to those directly involved in the report, suspicion or investigation – and is not shared with any third party, except as required by the laws of the Republic of Lithuania. Data collected is processed in accordance with the General Data Protection Regulation (GDPR) and other applicable data protection legislation.
8	**Response.** A report is investigated within 60 (sixty) calendar days; once the investigation or its review period concludes, the reporting person is informed of the outcome. Investigations are conducted in accordance with the Whistleblowing Policy and Procedures and the Organisation's Complaints Handling and Survivor Support Procedure. The Organisation takes appropriate corrective action, including disciplinary or legal measures, including against representatives who knew of a breach but failed to act. All Organisation representatives must cooperate fully with investigations into suspected breaches of this Policy; refusal to do so is itself considered a breach of this Policy. In accordance with the laws of the Republic of Lithuania, the relevant state authorities are informed of well-founded suspicions of misconduct towards children and adult Service and Support Recipients.
9	**Survivor-Centred and Trauma-Informed Approach.** When handling any concern or report, the

	wellbeing, wishes, needs and rights of the survivor are paramount. Support is provided to the survivor regardless of whether they choose to file a complaint or take part in an investigation, and in a manner that does not isolate, stigmatise or re-traumatise them. Our response takes into account that trauma can have a long-term impact on a person's health and psychological and social development.
10	**Applicable Legislation.** The Policy is implemented in accordance with the Save the Children International Safeguarding Policy, the 1989 United Nations Convention on the Rights of the Child, and the laws of the Republic of Lithuania, including the General Data Protection Regulation (GDPR).
11	**Induction and Refresher Training.** All Organisation representatives complete mandatory training on the safeguarding of Service and Support Recipients within their first month of employment, volunteering or engagement, and repeat it at least every 2 (two) years thereafter. Completion of training is recorded.
12	**Compliance Assurance and Audit.** The Organisation periodically assesses how Partners and Representatives who have direct contact with Service and Support Recipients comply with the requirements of this Policy, and may carry out checks or request supporting documentation.
13	**Our Ambition and Partnership.** The Organisation aims to demonstrate that it is a leader in the safeguarding of Service and Support Recipients. Working with partners, the Organisation seeks to spread knowledge of Service and Support Recipient safeguarding to other organisations and communities.

3. DEFINITIONS

Terms are listed in alphabetical order.

Term	Explanation
„Adult“	Any Service and Support Recipient of the Organisation aged 18 or over.
„Best Interests of the Child“	This concept derives from Article 3 of the United Nations Convention on the Rights of the Child. It includes the child's safety, health, wellbeing, family relationships, physical, psychological and emotional development, identity, freedom of expression, privacy, and the right to be heard and to freely form and express their views. In essence, the best interests of the child are whatever is best for that particular child.
„Child“	Any person under the age of 18.
„Digital Safeguarding“	Information systems and communication technologies, including the internet, social media, and digital images. Example: it is prohibited to publish images of Service and Support Recipients on personal social media accounts without the Organisation's specific consent.
„Grooming“	Behaviour or conduct aimed at building an informal or emotional connection with a person who holds less power, with the intent or possibility of using that connection in future for sexual or other exploitative purposes. Example: inviting a child we engage with to one's home, sharing personal contact details (a phone number, social media accounts) with them, giving gifts, or otherwise seeking to gain their special trust.
„Person of Concern“	The person(s) about whom a report or complaint has been received, i.e. a person who, it is suspected, caused or could have caused Harm through their

	acts or omissions.
„Safeguarding of Service and Support Recipients“	This term refers to the body of policies, procedures and practices that help ensure the Organisation is safe for children and adults – Service and Support Recipients and their family members. Harm to them may occasionally be caused by the intentional acts of individual employees or representatives of the Organisation. We do not tolerate such conduct and take resolute measures to prevent it and respond to it appropriately. We aim to ensure that everyone connected with the Organisation is properly informed and knows how to respond to instances of violence against and sexual exploitation of children and adults – whether in person or online. Everyone representing the Organisation must behave appropriately towards Service and Support Recipients, both at work and in their personal life, and must never abuse the trust placed in them by virtue of their position within the Organisation. We are also aware that Harm can arise from unintentional acts, a lack of prevention, or other inaction, as well as from accidents that could have been avoided. Such risks can be effectively reduced by embedding the safeguarding of Service and Support Recipients into programme planning and other areas of activity, including the digital environment. In other words, the Policy is our commitment to ensuring that everything within our control is done to safeguard the safety and wellbeing of the children and adults we work with. This helps establish a reliable foundation for the realisation of children's rights.
„Scope of Application of the Policy“	1. This Policy applies to: the Organisation's employees, Board members, volunteers and interns (hereinafter jointly referred to, for the purposes of this Policy, as “Staff”). 2. The Organisation's members (hereinafter – “Members”). 3. Representatives and employees of the Organisation's Service and Support Recipients, service providers, suppliers, and partners' employees and representatives, and other individuals, groups or organisations that have a formal/contractual relationship with the Organisation (hereinafter jointly referred to as “Partners”) and have direct contact with the Organisation's Service and Support Recipients (unless it has been formally agreed that the partner organisation will comply with its own service and/or support recipient safeguarding policy). 4. Donors, journalists, celebrities, politicians and other persons (hereinafter, for the purposes of this Policy, referred to as “Representatives”) who take part in the Organisation's activities or visit its offices and have contact with the Organisation's Service and Support Recipients; this Policy applies to them for the duration of their participation in the Organisation's activities or their visit to its offices. 5. All of the above must comply with this Policy in both their professional and personal life, whether interacting in person or online. Breaches of this Policy by Staff or Members may result in termination of employment/office or removal from membership. Breaches of this Policy by Partners/Representatives may result in the termination of the relationship with them, including any purchase, partnership, or other agreement. Furthermore, in accordance with the laws of the Republic of Lithuania, the relevant state authorities will be informed of any well-founded suspicion of misconduct towards the Organisation's Service and Support Recipients.

„Sexual Exploitation, Abuse and Harassment“	This includes the actual or attempted abuse of another person's position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting financially, socially or politically from the sexual exploitation of another person. Such conduct may occur in person or online (for example, demanding or sending sexual content). For the purposes of this Policy, any sexual activity with a person under the age of 18 is considered sexual exploitation of a child. Being mistaken about a child's age is not a defence. Sexual abuse means sexual acts carried out against a person's will. Harassment means unwelcome verbal, physical or visual conduct related to a person's sex, marital status, sexual orientation, race (including colour, nationality, or ethnic or national origin), religion or belief, age, or disability, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading or offensive environment.
„Survivor“	A person who has experienced or is experiencing Harm in connection with their relationship with the Organisation or its representatives. Although this Policy uses the term “survivor”, the person concerned has the right to choose how they wish to be referred to.
„Violence Against Children“	Violence against a child includes anything that individuals, institutions or established processes do or fail to do that results in direct or indirect harm to a child, or that limits a child's ability to develop safely and healthily into adulthood. The World Health Organization has defined the following main categories of violence: physical violence, emotional violence, sexual violence and exploitation, neglect, and negligent treatment. Physical violence involves the use of excessive physical force intended, or likely, to cause injury or pain. Emotional or psychological violence involves humiliating and demeaning behaviour, such as name-calling, constant criticism, belittling, shaming, and isolation. Sexual violence includes all forms of sexual abuse, including incest, early or forced marriage, rape, involvement in pornography, and sexual slavery. Sexual violence against children may also include inappropriate touching of children, the use of inappropriate sexual language towards children, and showing children pornographic material. Neglect involves the intentional or negligent failure to meet a person's basic physical and/or psychological needs.

4. RELATED ORGANISATIONAL DOCUMENTS

	Summary of the Service and Support Recipients' Safeguarding Policy
	Service and Support Recipients' Safeguarding Code of Conduct and its child- and youth-friendly version
	Service and Support Recipients' Safeguarding Policy Implementation Procedures
	Service and Support Recipients' Safeguarding Assessment Tool
	Whistleblowing Policy
	Whistleblowing Procedures
	Complaints Handling and Survivor Support Procedure