

BRF SAFEGUARDING HANDBOOK

Available in:	English Greek
MT approved on ¹ :	29-09-2022
Last revised on:	28-09-2022
Up for revision on:	29-03-2023
Inquiries about policy	Safeguarding and Compliance Officer (safeguarding@boatrefugee.com)

¹ This policy applies to the Boat Refugee Foundation in the Netherlands, its Greek foreign branch and any subsidiary organs of the organisation. BRF may unilaterally introduce, vary, remove or replace this policy at any time, providing due notice.



TABLE OF CONTENT:

1. INTRODUCTION	3
2. WHAT TO DO IF SOMEONE TALKS TO YOU ABOUT A SAFEGUARDING INCIDENT	3
3. HOW TO REPORT A SAFEGUARDING INCIDENT	4
4. RESPONSIBILITIES FOR SAFEGUARDING	5
5. STEPS AFTER A SAFEGUARDING INCIDENT REPORT	7
6. MANAGING A SAFEGUARDING INCIDENT	8
7. SAFEGUARDING COMMITMENTS	11



1. INTRODUCTION

Safeguarding is a set of organisational policies, procedures and practices designed to ensure that no harm comes to people as a result of contact with an organisation's programmes, operations or staff members (including volunteers) and representatives. Boat Refugee Foundation's (BRF) safeguarding policy covers the responsibility of ensuring that our operations, staff and programmes do not harm or fail to protect anyone, especially vulnerable people.² This policy describes the responsibility of BRF's staff on preventing, reporting and responding to harm. Failure to follow or respect safeguarding measures could result in disciplinary action in addition to any appropriate external measures.

BRF believes that everyone has the right to be protected against any form of abuse³ or exploitation⁴, including, but not limited to, abuse of power, bullying⁵, intimidation⁶, discrimination⁷, aggression⁸, harassment⁹ or violence¹⁰. Regardless of gender, ethnicity, political association, religion, sexual orientation and whether or not they have a disability. Understanding that the organisation works with and provides services to vulnerable people.

BRF commits to a zero tolerance stance on sexual exploitation, abuse and harassment and bullying but acknowledges that the risk of such harm can never be completely eradicated. For this reason, zero tolerance means encouraging reports, investigating and sanctioning even minor infringements on the safeguarding measures outlined in this handbook and BRF's Code of Conduct.

2. WHAT TO DO IF SOMEONE TALKS TO YOU ABOUT A SAFEGUARDING INCIDENT

As a staff member, anyone who you work with or work for could come forward about a safeguarding incident; a (suspicion of) abuse or exploitation. Please take note of the following requirements for handling such a situation:

- Ensure that the person reporting is not in immediate danger.

² Vulnerable people are any persons below the age of 18, regardless of national laws or cultural practices which may stipulate a younger age, or persons over 18 years old who, because of their disability, age, gender, sexual orientation, socioeconomic status, geographical location, ethnic origin, religion or political opinion may find themselves unable to satisfy their fundamental needs, are particularly exposed to risks.

³ Abuse is a general term covering all forms of physical and/or emotional ill-treatment, sexual assault, neglect or negligent treatment or exploitation resulting in actual or potential harm to a person's health, survival or dignity in the context of a relationship or responsibility, trust or power.

⁴ Exploitation is 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 of another.

⁵ Bullying is a term for actions or words that seek to harm, intimidate, or force in order to gain power and control. Examples: unnecessary criticism, spreading rumours, intentionally undermining, deliberate isolation, making inappropriate personal comments, hitting, pushing, damaging or stealing personal possessions.

⁶ Intimidation relates to the frightening or threatening of someone, usually in order to force or deter an action.

⁷ Discrimination relates to any distinction, exclusion or restriction on the grounds of disability or other criteria (sex, age, ethnic origin, etc.) which has the purpose or effect of compromising or preventing the recognition, enjoyment or exercise of all human rights on an equal basis with others.

⁸ Aggression refers to feelings of anger and antipathy resulting in hostile or violent behaviour that is intended to harm another individual.

⁹ Harassment consists of repetitive and unwanted conduct, whether verbal, physical or visual, which is related to a person's profile or characteristic with the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating or offensive environment. Violence is behaviour involving physical force intended to hurt, damage or kill someone or something.

¹⁰ Violence is behaviour involving physical force intended to hurt, damage or kill someone or something.



- Show empathy and listen carefully without judgement or feedback. Do not directly question the person that reports abuse or suspicion of abuse to you. Avoid any form of physical contact. Let the person who reports to you speak freely, without interruptions.
- Acknowledge the concerns of the person reporting to you and show appreciation for the trust the person has placed in you.
- Do not offer false confidentiality as you are obligated to report any (suspicion of) abuse or exploitation by a member of the organisation or its partner organisations. Your duty to report is always survivor-centred, if the survivor wants to remain anonymous, please respect this choice. Please be aware that it might be difficult to properly investigate if certain details in the report are missing.
- Keep detailed notes of the information that has been provided to you. Make sure that these notes remain confidential. These details are going to be necessary for a safeguarding incident report or might be used as evidence at a later stage. Be objective when recording the report and stay truthful to the words of the person making the report.
- Be clear about the next steps (reporting process) and never make promises that you can't keep.
- Report the safeguarding incident as soon as possible and no later than 24 hours after the disclosure.
- Be mindful of the impact that a safeguarding incident could have on yourself. Seek support or aftercare from your supervisor if required.

3. HOW TO REPORT A SAFEGUARDING INCIDENT

All BRF staff members (including volunteers) and representatives are obliged to report any (suspicion of) abuse or exploitation by a member of the organisation or its partner organisations.¹¹ Failure to report or the covering up of a safeguarding incident is a breach of BRF's policy and could lead to disciplinary actions in addition to any appropriate external measures.

Victims or witnesses are strongly encouraged to report abuse (or suspicion of abuse) by BRF staff members or any organisation that BRF works with. Our approach to safeguarding is victim centred and is dealt with in a confidential manner. Serious concerns may be reported anonymously through the online reporting form¹². Please be aware that it might be difficult to properly investigate if a report is submitted anonymously, however you are not required to share your identity when making a disclosure.

BRF service users - Either, report abuse, or suspicion of abuse to a BRF staff member on shift. The BRF staff member will report this to the Safeguarding Focal Point, who will take further steps in filling an (online) Incident Reporting Form (bit.ly/3YoBtHl) and which will raise the incident with the Safeguarding and Compliance Officer. Or report abuse, or suspicion of abuse to the Safeguarding and Compliance Officer by filling an (online) Incident Reporting Form (bit.ly/3YoBtHl), who will take further steps. The online Incident Reporting Form can be filled in anonymously.

¹¹ An organisation which has a formal relationship agreement with BRF.

¹² Alternatively, a report could also be filed through an anonymous email service such as [CyberAtlantis](#) or [Anonymouse](#).



Staff members field - Report abuse, or suspicion of abuse to your local Safeguarding Focal Point, who will take further steps in filling in the (online) Incident Reporting Form (bit.ly/3YoBtHI) and raising the incident with the Safeguarding and Compliance Officer who will take further steps. Or report abuse, or suspicion of abuse to the Safeguarding and Compliance Officer by filling an (online) Incident Reporting Form (bit.ly/3YoBtHI), who will take further steps. The online Incident Reporting Form can be filled in anonymously.

Niska Stoker	Safeguarding and Compliance Officer	safeguarding@boatrefugee.com
Marieke Vrins	Focal point Lesvos, Greece	mhpss-lesvos@boatrefugee.com
Myrte de Bruijn	Focal point Lesvos, Greece	volunteers-lesvos@boatrefugee.com

Staff members HQ - Report abuse, or suspicion directly to the Safeguarding and Compliance Officer or report through the (online) Incident Reporting Form (bit.ly/3YoBtHI).

4. RESPONSIBILITIES FOR SAFEGUARDING

BRF has a zero-tolerance policy against any form of abuse and is committed to safeguarding everyone who works in, or meets, the organisation. The safeguarding policy applies to all staff¹³ (including volunteers, board members, donors, and interns) and representatives that work with BRF.¹⁴ The responsibility for the implementation and enforcement of the safeguarding policy lies with different people within the organisation:

Individual responsibility: All staff members are obliged to create and maintain an environment which prevents any form of abuse or exploitation. You are obliged to report any abuse or suspicions of abuse (safeguarding incidents). Failure to report or the covering up of a safeguarding incident is a serious breach of BRF's policy and could lead to disciplinary actions or appropriate external measures.

Coordinators and manager's responsibility - Coordinators/managers are often the first to hear about safeguarding-related incidents. They must ensure that reports or complaints are taken seriously and reported to the Safeguarding focal point and Safeguarding Officer. Coordinators and managers are responsible for setting an example of transparency and facilitating a strong safeguarding culture within and between teams. As well as upholding standards themselves, coordinators and managers are expected to ensure that all staff understand the provisions clearly and challenge any unacceptable behaviour.

Safeguarding and Compliance Officer (SCO) - The Safeguarding and Compliance Officer is the staff member from the headquarter who is responsible for the effective management of safeguarding incidents and for the effective implementation of the Safeguarding Policy. The Safeguarding Officer is the chair of two working groups (1) the BRF Safeguarding

¹³ Covers all staff, volunteers and interns under contract with BRF, either in the field or at the headquarters in the Netherlands.

¹⁴ Covers all contractors e.g. consultants, journalists, photographers, videographers, external media, board members, ambassadors, donors, guests, visitors and supporters.



Forum, together with the Safeguarding Focal Points, discussing implementation and development of safeguarding in practice. (2) The Safeguarding and Compliance Committee (SCC).

The Safeguarding and Compliance Officer reports to the Director of the organisation as well as reporting to the relevant regulatory body, depending on the incident, there may also be a requirement to notify the police, local authority and the relevant regulator or statutory agency including donor(s).

Niska Stoker	SCO	safeguarding@boatrefugee.com
--------------	-----	--

Safeguarding and Compliance Committee Consist of a member of the HQ Programmes Team, the Human Resources Manager and a member of the Management Team (MT) who investigate and respond to safeguarding (and compliance) reports.

Niska Stoker	SCC member	safeguarding@boatrefugee.com
Simone van der Velde	SCC member	simone@bootvluchteling.nl
Annerieke Berg	Director	Annerieke@bootvluchteling.nl

Safeguarding Focal Points - There is a Safeguarding Focal Point at each field location where the organisation operates. They are the first point of contact for safeguarding issues and support the Safeguarding Officer in the effective implementation of the Safeguarding Policy and the effective management of safeguarding incidents. They report to the Safeguarding Officer and are a member of the Safeguarding Forum. The Safeguarding Forum meets every quarter to discuss the practical implementation and development of safeguarding policy.

Niska Stoker	Safeguarding and Compliance Officer	safeguarding@boatrefugee.com
Marieke Vrins	Focal point Lesvos, Greece	mhpss-lesvos@boatrefugee.com
Myrte de Bruijn	Focal point Lesvos, Greece	volunteers-lesvos@boatrefugee.com

Management Team (MT) - The members of the MT are together (and individually) responsible for ensuring a sense of accountability between staff so that potentially abusive behaviour can be challenged. The MT also needs to incorporate safeguarding measures into programmes and projects. The MT is obliged to consider in good faith the recommendations from the Safeguarding Officer. The MT is responsible for keeping oversight of BRF's incident reporting and management in relation to any safeguarding



incidents where staff members were involved. The director is accountable to the Board of Supervisors and the MT is accountable to the director.

Annerieke Berg-De Boer	Director	annerieke@bootvluchteling.nl
Johanna van der Meer	Head of Operations	johanna@bootvluchteling.nl
Dilanga Manuweera	Head of Programmes	dilanga@bootvluchteling.nl

Board of Supervisors - Members of the supervisory board are collectively (and individually) responsible for monitoring appropriate safeguarding policies and procedures. They must monitor whether the organisation has appropriately addressed any safeguarding concerns.

Miguette Jadoul	Chairman	miguette@bootvluchteling.nl
Ilse Westerbeek	Board member	ilse@bootvluchteling.nl
Pieter van Essen	Board member	pieter@bootvluchteling.nl
Frederique Ummels	Board member	frederique@bootvluchteling.nl

5. STEPS AFTER A SAFEGUARDING INCIDENT REPORT

When reporting (a suspicion of) abuse or exploitation you are not responsible for (further) investigating the serious concerns raised. All investigations will be conducted in a fair, independent and timely manner¹⁵ and all reasonable efforts will be made to preserve confidentiality during the investigation. Where possible, the (alleged) victim will be provided with feedback on the progress and expected timeframes of the investigation.

The person against whom any allegations have been made will also be informed of the concerns and will be provided with an opportunity to respond unless there are any restrictions or other reasonable grounds for not doing so.

There are three types of Reports that could be received by the Safeguarding and Compliance Officer:

- Category 1 - This concern relates directly to a BRF staff member or representative.
- Category 2 - This concern relates to a BRF Partner staff member.
- Category 3 - This concern relates to abuse which does not involve BRF staff or staff of partners within the community BRF is working.

¹⁵ A safeguarding incident investigation by the Safeguarding and Compliance Committee must be carried out in a timely way (if possible within 3 weeks), in the country of the alleged abuse, if necessary.



Category 1:	Category 2:	Category 3:
BRF has a duty of care and will respond by initiating an investigation.	BRF has a partial duty of care and will request the partner organisation to initiate an investigation.	BRF has no formal responsibility to investigate, but may have an influence on the community.
Initiate internal safeguarding investigation.	Request the partner to initiate an investigation process, and to share the final report.	BRF will not investigate this concern, but after considering the best interest of the vulnerable individual, may pass on this information to the local authorities (social services or the police).
Internal report about disciplinary actions in addition to any appropriate external measures.	Review the partner's final report and the actions taken.	
If there is evidence of a criminal offence a report will be filed with the authorities.	If not satisfied, may consider ending the partner relationship.	Follow up on any actions taken by the authorities.

6. MANAGING A SAFEGUARDING INCIDENT

BRF will take swift and appropriate action against any staff member who breaches this policy by perpetrating any form of abuse or exploitation. This may include administrative or disciplinary action, legal action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country. All actions will be informed by a survivor-centred approach and an assessment of feasibility and risk to all those involved.

Within 24 hours of receiving a complaint or information about an alleged safeguarding incident, the Safeguarding Officer shall convene a meeting of the Safeguarding and Compliance Committee.

The investigating officer(s)

The Committee appoints an Investigating Officer (this could be a member of the committee or any staff member) who will establish all the facts/details of the incident (see section information that needs to be gathered by the investigating officer below). The nature and extent of the investigation will depend on the initially perceived seriousness of the allegation. If additional information is required or the facts need to be confirmed, an independent investigation could be carried out.

The role of the investigator will be to carry out interviews (in person or online) with relevant parties, gather facts and write a report. The investigating officer may have a support officer to assist them.

The Investigating Officer will determine if based on facts, any misconduct or possible breaches of relevant policy is 'established', 'not established' or 'inconclusive'. Any findings on unsafe work practices, inadequate leadership or supervision and/or poor line management, except in cases of gross misconduct, should be contained in the report with recommendations to rectify them.



It is not the role of the Investigating Officer to provide an argument of mitigation at the hearing, nevertheless if during the investigation mitigating factors are presented to the Investigating Officer, then these should be investigated and where appropriate and relevant presented in the Investigation Report. It is important to establish from the staff member's personal file whether they have a good record to date or whether current warnings already exist in relation to the current conduct etc.

The investigation by the Investigating Officer must be carried out in a timely way (if possible within 3 weeks), in the country of the alleged abuse, if necessary. A final report shall be submitted to the Safeguarding and Compliance Committee which will decide on the next steps, which could include administrative or disciplinary action (in line with BRF's disciplinary guidelines), legal action, and/or referral to the relevant authorities for appropriate action, including criminal prosecution, in the abuser's country of origin as well as the host country.

Safeguarding and Compliance Committee

During the investigation process the Safeguarding and Compliance Committee remains responsible for:

Category 1 (see chapter 5):

- Reporting to relevant authorities where a possible criminal activity is suspected or has taken place.
- Working with (child) protection authorities to determine the next steps.
- Considering if the Subject of the complaint should be suspended based on the disciplinary guidelines.

Category 2 (see chapter 5):

- Reporting to relevant authorities where a possible criminal activity is suspected or has taken place
- Reporting the concern to the Partner organisation and offering advice, support, advocacy and resources if requested, and agreeing on follow-up action with deadlines to monitor compliance with safeguarding policy.
- Recommending appropriate action if the partner organisation refuses or fails to carry out follow-up action including suspension of partnership agreements pending the outcome of investigations, informing donors of the concern, and managing relationships with other partners.

Category 3 (see chapter 5):

- Reporting to (child) protection authorities if criminal activity is suspected or has taken place.
- Offering advice, support, advocacy and resources, if necessary.
- Referring the matter to appropriate agencies that can provide counselling or legal support to survivors.

For all categories:

- Taking into consideration that the 'best interest' principle for the person at risk will be the paramount consideration when making decisions with regard to this policy



- Monitoring the process of the investigation and providing guidance if required. Ensuring the subject of the Safeguarding incident complaint is given an opportunity to answer any questions by the investigation team during an internal investigation.
- Logging the incident, with relevant anonymised details and reporting to appropriate internal or external stakeholders.
- Recommending appropriate action when the investigation is finalised according to disciplinary standards.
- Monitoring the emotional impact on staff who must deal with a safeguarding issue or concern and providing appropriate advice and support.
- Liaising with the Communications Team and Management Team in preparation of a press release, if necessary.
- Respecting and ensuring confidentiality.

Management

Management should refrain from taking formal action in a disciplinary case until all the facts related to an allegation are known. If necessary, management should consider if the Subject of the complaint should be suspended during the investigation, in line with BRF's disciplinary guidelines. The same principles apply if during the course of the investigation further allegations arise.

Staff Member's rights

Staff have a right to be treated fairly, reasonably and with respect after a complaint has been lodged against them. Those being interviewed or called to a hearing must be made aware of their right to be accompanied/represented if they wish. If during the course of an investigation further allegations arise, the staff member being investigated must be informed and given the opportunity to provide their side of events to the investigator.

The person accompanying or representing may be either a trade union official, a member of management or a colleague or any legal representation. The staff member must inform the investigating officer, in good time, who the chosen person who will be accompanying or representing them will be (no later than 2 days before an interview). Staff are allowed reasonable time off from their duties without loss of pay to act as a companion.

In some circumstances the choice of companion may not be allowed; for example, someone who may have a conflict of interest, or whose presence may prejudice the meeting (a conflict of interest will be determined by the investigating officer). The investigating officer may ask you also to choose someone else if the meeting would have to be delayed for over ten working days because your companion is unavailable.

Obtaining information from witnesses

Investigating officers may request a witness to provide a written statement, obtaining such a statement would be in line with best practice. If the information provided by a witness is not in the form of a signed statement, the recorded information should clearly indicate that this information is based on the notes of the investigator(s) and the witness should be provided with a copy and asked to sign that it is a fair record of the interview.

In a safeguarding situation, if the witness is a child or vulnerable adult/adult at risk then the person who accompanies the witness, must review and confirm that the recorded



information is a fair record of the interview. The information gathered from witnesses should focus on establishing the facts so that the evidence can help to support or refute the allegations.

Information that needs to be gathered by the Investigating Officer

The Investigating Officer needs to establish all the facts/details of the incident. The following questions may assist in establishing the facts/details:

- What is alleged to have happened?
- When is it alleged to have happened?
- Where is it alleged to have happened?
- Who was involved?
- To whom did it happen?
- How did it happen?
- Who witnessed the incident(s)?
- Has anything similar occurred before –when, where, how etc. and how was it dealt with?
- What aspects appear to be substantiated?
- What BRF policies, codes of conduct, rules of practice or accepted standards or parameters, implied or explicit, have been breached?
- Did the member of staff understand the relevant staff policies, codes of conduct, rules of practice and accepted standards or parameters, which apply?
- What evidence is there that they had received relevant instruction or training?
- Why is what is alleged to have happened a matter of concern?
- Could what is alleged have actually happened? Verify the allegation and testimony against other available information. For example, check any logbooks, rotas, absence lists, records, computer hard drives, physical layouts and locations.
- Could witnesses have seen or heard what they claim?

Is there evidence of adequate supervision and proper management of the staff or team?

7. SAFEGUARDING COMMITMENTS

BRF is committed to the safeguarding of those we work for and with. Many of the people we work with experience increased vulnerability as a result of experienced trauma, current insecure circumstances and worries about their future. It is therefore vital that staff and representatives of BRF work with people respectfully and in a way which maintains their safety, dignity and security and are committed to the following principles:

Organisational culture, leadership and accountability

1. BRF will make every effort to abide by the sector's minimum standards¹⁶ and promote, create and maintain a safe organisational culture for all people who work for and with BRF, including our partners and the communities where BRF works. BRF will create an environment where it is safe to address sexual harassment, exploitation and (child) abuse.

¹⁶ As a growing organization, BRF is committed to expanding its capacity in order to best meet internationally recognised standards and practices including the Protection from Sexual Exploitation and Abuse (PSEA) index of the Core Humanitarian Standard (CHS); Collaborating with others in our sector to advance global safeguarding practice; Ensuring policies and practices address the needs of vulnerable groups.



2. BRF will develop organization-specific safeguarding strategies, with appropriate levels of dedicated capacity and allocated resources at all levels of the organization, to prevent and respond to sexual harassment, exploitation and (child) abuse.
3. BRF will ensure high-level oversight and accountability around its safeguarding efforts. We will do this through monitoring and reviewing our safeguarding performance and seeking feedback from BRF employees, partners, and program participants. We are committed to continuous learning and improvement to prevent and respond to abuse. We will be accountable and transparent in communicating our efforts and progress to various internal and external audiences. The information that is shared will be informed by a survivor-centred approach and risk assessment.

Human resources

4. BRF employs staff in compliance with applicable laws and will prevent known perpetrators of sexual harassment, exploitation and abuse from being (re)hired or (re)deployed. BRF will ensure robust recruitment screening processes for all personnel, particularly for personnel working directly with vulnerable people.
5. BRF will ensure all staff members are aware of our Safeguarding Policy and how to report wrongdoing by incorporating BRF's expectations on the prevention of abuse in relevant codes of conduct, new employee orientations, awareness-raising training and refresher courses, and through regular internal communications.

Partners

6. BRF will promote and require safeguarding with partners. BRF will ensure adequate safeguarding assessments as part of due diligence processes when considering new and existing partnerships. The failure of partners to take preventive measures against abuse, or failure to investigate and report allegations in a timely manner, or to take corrective actions when abuse has occurred constitute grounds for BRF to terminate a partnership. Partner organisations will be made aware of these requirements and BRF's Safeguarding Policy.
7. We will respect our partners, sub-grantees and sub-recipients and where possible and necessary, support them in having the skills and capacity to fulfil their responsibilities consistent with this policy.
8. For vendors, consultants, and independent contractors, BRF will incorporate this Policy as an attachment to any written agreement or otherwise develop a summary of the requirements contained in this Policy and the provisions noted in this section.
9. BRF will collaborate on safeguarding within the sector, including with communities, other organisations, donors, governments, global civil society networks and local partners, to advance our practices and contribute to wider efforts to prevent and respond to abuse.

Embedding safeguarding in our work

10. BRF will undertake safeguarding risk assessments to identify areas of safeguarding risks and clearly document steps that are being taken to remove or reduce these risks.
11. BRF will incorporate safeguarding measures into programs and projects. We will do this through our collaborative program design approach, including with our partners and program participants, at all stages to produce better design,



monitoring and evaluation of safeguarding in our programs. We aim to identify and mitigate or minimise, risks arising from our programs.

Response and follow-up to reports

12. BRF will ensure the development, dissemination and implementation of a clear complaint and reporting mechanism by which complaints or suspected breaches of the Safeguarding Policy can be investigated efficiently and in a timely manner.
13. BRF will provide support and assistance to complaints and to anyone who has experienced any form of abuse by a BRF staff member. This may include medical treatment, legal assistance and psychosocial support. Our support and assistance will be informed by a survivor-centred approach, feasibility, and an assessment of risk to all those involved.
14. BRF will take appropriate actions to the best of BRF's abilities to protect persons from retaliation where allegations of abuse involving BRF staff are reported in good faith.
15. BRF will ensure that all allegations of abuse against BRF staff and its partners are thoroughly examined, risk-assessed, and where needed, investigated and/or referred to another agency for investigation or reported to law enforcement. BRF's investigations will be conducted in a timely, safe and professional manner by those with appropriate training and experience in sensitive investigations and informed by gender-sensitive and survivor-centred approaches.

Communication and media

16. At all times, the dignity of children and vulnerable adults/adults at risk must be respected. Therefore all personal information and details of children or vulnerable adults/adults at risk, which may identify them or may increase the potential risk of harm or injury to their name or reputation or their families, should not be used.