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1. Introduction to the Safeguarding Policy

Purpose

Kiron is committed to safeguarding our community of students, staff members and partners, ensuring that our projects and activities are delivered in a way which keeps everyone safe. Kiron believes that everyone regardless of age, sex, gender, race, colour, ethnic origin, religion, political beliefs, sexual orientation, gender identity, mental health, ability, socioeconomic background or any other aspect of their background or identity has the right to be protected from all forms of harm, abuse, neglect and exploitation.

Kiron pursues the mission to “provide a virtual home for learning, personal growth and collective impact” in order to reach our vision of “a world world where everyone can fulfill their highest potential for a self-determined, dignified life, shaping a sustainable future together.” Kiron recognizes the power dynamics inherent in working with people in a situation of vulnerability, such as refugees, asylum seekers or internally displaced persons, and will not tolerate any kind of abuse and exploitation by any member of the Kiron community under any circumstances. Our priority is to provide a safe, secure, invigorating, inclusive and motivating digital space for our students to learn and grow.

This Safeguarding Policy aims at creating a culture of zero-tolerance to any form of harm in our community and it is based on the principles of non-discrimination, confidentiality and responsibility to raise concerns. The purpose of this policy is to set the ground for Kiron’s Safeguarding structure and ensure all members of the Kiron community are protected from any harm arising from:

- The conduct of staff or personnel associated with Kiron, including Kiron partners
- The conduct of other members of the community, including other students

- The design and implementation of Kiron's programmes and activities, especially in Kiron's digital platform Kiron Campus¹.

This policy is the basis of other related Kiron policies, but does not cover :

- Sexual harassment in the workplace - covered by Kiron's Anti-Bullying and Harassment Policy
- Whistleblowing - covered by Kiron's Whistleblowing Policy

Definition of Safeguarding

Kiron defines safeguarding as the responsibility to protect the health, wellbeing and human rights of Kiron students, Kiron staff members, Kiron partners and anyone that comes in contact with Kiron, and enabling them to live free from harm, abuse, exploitation and neglect. This definition draws from our Kiron values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability.

Kiron takes a holistic approach to safeguarding: we work to ensure the physical, emotional, social and spiritual wellbeing of our wider community. We are committed to safeguarding the people we come in contact with both in the personal face-to-face environment and especially in the online environment. We work to implement effective technical solutions, advice, support, and the necessary procedures to keep our community safe in our virtual platform Kiron Campus.

Kiron Open Higher Education GmbH offers online learning opportunities to refugees, asylum seekers and underserved communities, therefore we recognize that our students live in a context of specific vulnerability. Due to their particular legal situation and the limited access to education,

¹ Please see intersections with Kiron's Digital Privacy and Protection measures which put into practice and mainstream many aspects of this policy within it.

employment and other services, Kiron students over the age of 18 are considered adults at risk for the purpose of this policy.

In the scope of Kiron's daughter company Kiron Digital Learning Solutions GmbH, our online platform welcomes children between 7 and 17 years old in separate digital spaces managed by our clients independently. While Kiron reinforces safeguarding principles and practices across all programs and activities, our clients are deemed primarily responsible for the safeguarding and protection of the rights of their students. Kiron encourages all our clients and partners to have a Safeguarding Policy in place and/or to abide by our Safeguarding Policy, and to implement the best prevention mechanisms in our online platform.

Overall, safeguarding applies consistently and without exception across our programmes, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until proven guilty.

Further definitions are provided in the glossary at the end of the document.

Scope

This policy and associated procedures apply to all individuals involved in Kiron's activities including:

- All staff employed by Kiron
- Advisory Board members
- Associated personnel whilst engaged with work or visits related to Kiron, including but not limited to the following: consultants, volunteers, contractors, programme visitors, journalists, shareholders, donors, celebrities, politicians and any other external visitors.

Kiron expects our partner organisations, including for example, suppliers and other NGOs coordinating programs with us to adopt and demonstrate their commitment to the principles and practice as set out in this Safeguarding Policy and associated procedures.

Kiron commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

Policy Statement

Kiron believes everyone has the right to live free from abuse or neglect regardless of age, sex, gender, race, colour, ethnic origin, religion, political beliefs, sexual orientation, gender identity, mental health, ability, socioeconomic background or any other aspect of their background or identity.

Kiron is committed to creating and maintaining a safe and positive environment and an open, listening culture where people feel able to share concerns without fear of retribution.

Kiron acknowledges that safeguarding is everybody's responsibility and is committed to prevent abuse and neglect through safeguarding the welfare of everyone involved in our activities.

Kiron recognises that health, well-being, ability, disability and need for care and support can affect a person's resilience. We recognise that some people experience barriers, for example, to communication in raising concerns or seeking help. We recognise that these factors can vary at different points in people's lives.

Kiron recognises that there is a legal framework within which we need to work to safeguard adults who have needs for care and support and for protecting those who are unable to take action to protect themselves and will act in accordance with the relevant safeguarding adult legislation and with local statutory safeguarding procedures.

Actions taken by Kiron will be consistent with the principles of adult safeguarding ensuring that any action taken is prompt, proportionate and that it includes and respects the voice of the adult concerned.

This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them (see Associated Policies).

2. Legal basis of the Safeguarding Policy

Kiron strives to adopt the highest standards of practice across all areas of Safeguarding rather than settling for the minimum standard in order to be legally compliant. Kiron commits to:

- [The Universal Declaration of Human Rights](#)
- [The UN Convention on the Rights of the Child](#), along with its three Optional Protocols:
 - [The Optional Protocol on the involvement of children in armed conflict](#)
 - [The Optional Protocol to the Convention on the sale of children, child prostitution and child pornography](#)
 - [The Optional Protocol on a communications procedure](#)
- [The Convention on Elimination of all Forms of Discrimination Against Women](#)
- Conventions of the International Labour Organization, for example the Convention concerning the [Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour](#)
- The [Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse](#)
- Laws of the Federal Republic of Germany on the protection of children and young people, particularly [Book Eight of the Social Welfare Law – Assistance for Children and Young Persons](#)
- The relevant legislation in Jordan and Lebanon
- The [Core Humanitarian Standards](#)

- The [Inter-Agency Standing Committee's Core Principles on Protection from Sexual Exploitation and Abuse](#)

Key definitions

Abuse

Any action or inaction that causes harm to another person. It can include physical abuse, emotional abuse, sexual abuse and neglect. It also includes abuse online and/or through mobile technology.

There are various types of abuse including²:

- Sexual abuse: Any actual or threatened sexual act of violence perpetrated against a child or adult, whether by force or under unequal or coercive conditions. Examples of sexual abuse include rape, abusive sexual contact like unwanted touching and non-contact sexual abuse such as sexting and verbal or behavioral sexual harassment.
- Physical abuse: The actual or likely physical injury to a child or adult, such as hitting, kicking or shaking, where there is definite knowledge, or reasonable suspicion, that the injury was inflicted or knowingly not prevented.
- Emotional abuse: Harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, bad name calling, constant criticism, threats, persistent shaming, solitary confinement, isolation and not giving care and affection.
- Neglect: When basic needs such as food, warmth and medical care are not met, or when there is a failure to prevent exposure to any kind of danger.

Associated personnel or representatives

Board members, volunteers, interns, trainees, contractors, consultants, moderators, ambassadors (includes staff and associated personnel of partner organisations).

² Please see the Annex for a more detailed list of types of abuse.

At risk adult

Sometimes also referred to as vulnerable adult. Any person aged 18 or over who is, or may be, in need of care or support because of their age, gender, illness, disability, sexual orientation, gender identity, economic, political or legal status, and as a result is unable to protect themselves from either the risk or experience of neglect or abuse.

In the context of this policy, Kiron students are considered at risk due to their situation of displacement, being, asylum seekers, internally displaced persons or stateless individuals. Their legal situation and lack of access to basic services makes them be at a higher risk of neglect or abuse.

Beneficiary of Assistance

Someone who directly receives goods or services from Kiron's programme. Note that misuse of power can also apply to the wider community that the NGO serves, and also can include exploitation by giving the perception of being in a position of power.

Child / Children / Minor

Any person under the age of 18 years in accordance with the definition under the almost universally ratified UN Convention on the Rights of the Child, 1989.

Harm

Harm occurs when a person, or people, deliberately take advantage of another person or group. But it can also happen if an adult is unintentionally putting themselves at risk, simply because they do not have the right level of support in place or the information needed to protect themselves. For example, when adults at risk rely on others to help them to basic day-to-day living, they are at a higher risk of suffering harm. A person can be subjected to harm anywhere: In their home, where

they work, in a public place – often by the people closest to them. It can even happen in the very places tasked with the responsibility of protecting them such as a care home or day centre.

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Sexual exploitation

The term 'sexual exploitation' means 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. This definition includes human trafficking and modern slavery.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

Staff members

Persons employed part-time or full-time, either under a regular work contract, an internship, a student assistant contract, a freelance contract or a volunteering agreement.

3. Policy Implementation

Mitigation

Kiron ensures that all programming is designed, implemented and monitored through a safeguarding lens. Safeguarding has been prioritized as a standing item on the management board agenda and Kiron has designated the Advisory Board member Anna HÄßlin as a focal point for safeguarding. Kiron's Safeguarding mitigation commitments are:

- **Safe recruitment:** Kiron implements stringent safeguarding procedures when recruiting and coordinating staff and associated personnel, including criminal background checks for staff that will come into contact with Kiron students. Safe recruitment procedures range from clear anti-discrimination statement in our job ads to specific interview techniques.
- **Safe programming:** Kiron designs and undertakes all of its programmes and activities in a way that protects all members of the Kiron community from any risk of harm that may arise, especially for our students. This includes the ways in which information about individuals in our programmes is gathered and communicated³. Kiron is currently developing a risk assessment procedure aligned with the Safeguarding Policy.
- **Staff training:** Ensuring all staff have access to, are familiar with, and know their responsibilities within this policy. The Safeguarding topic is presented during the onboarding of new staff members and part of the Employee Handbook, and Kiron is committed to ongoing safeguarding awareness actions. Kiron also ensures that staff receive training on safeguarding at a level commensurate with their role in the organization.

³ See intersections with Kiron's Data and Privacy Protection Policy and GDPR compliance.

Kiron staff's responsibilities and obligations

Kiron ensures that anyone working on behalf of our organization will be subject to a robust safeguarding check. All staff members are required to sign Kiron's Code of Conduct⁴ upon the work contract signature. Kiron staff and associated personnel must not:

- Engage in sexual activity with any children or adult at risk
- Sexually abuse or exploit minors or adults at risk
- Subject a minor or adult at risk to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with minors including child labour or trafficking
- Approve or enable children to gain access to Kiron's digital platform, until a separate and highly secure pathway is created for Kiron Campus for this purpose. An exception to this point applies to the clients of Kiron Digital Learning Solutions GmbH, who are managing the platform independently and are responsible for safeguarding their students.

With regards to protection from sexual exploitation and abuse, Kiron staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
- Engage in any sexual relationships with Kiron students, regardless of their age, since they are based on inherently unequal power dynamics.

Kiron staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by a Kiron staff member or associated personnel to the Safeguarding Officer or the appropriate supervisor.

⁴ The Code of Conduct for Kiron staff members can be found at the end of this document in Anex II.

- Manage safeguarding concerns with confidentiality and only share them without consent where the duty to protect minors or vulnerable adults from harm supersedes an individual's right to privacy.

Person-centered Safeguarding approach

Kiron recognizes that adults make choices that may mean that one part of our well-being suffers at the expense of another – for example we move away from friends and family to take a better job. Many Kiron students and staff members may be affected by the fact of being far away from their communities. Similarly, adults can risk their personal safety, for example, to share personal contact information online being unaware of the risks attached to this practice.

Kiron acknowledges that we do not make these choices for another adult and we have limited influence in such personal choices, especially since most of our contact with students happens online. It is important for Kiron to understand what matters to our students and how we can better support them to protect themselves while studying online. Similarly, Kiron is committed to provide staff members and partners that interact with Kiron with the information they need to work safely.

The concept of 'Person Centred Safeguarding'/'Making Safeguarding Personal' means engaging the person in a conversation about how best to respond to their situation in a way that enhances their involvement, choice and control, as well as improving their quality of life, well-being and safety. Kiron works to support our students to achieve the outcomes they want for themselves. Their views, wishes, feelings and beliefs must be taken into account when decisions are made about how to support them to be safe. There may be many different ways to prevent further harm. Working with the person will mean that actions taken help them to find the solution that is right for them. Treating people with respect, enhancing their dignity and supporting their ability to make decisions also helps promote people's sense of self-worth and supports recovery from abuse.

If someone has difficulty making their views and wishes known, then they can be supported or represented by an advocate. This might be a family member or friend of their choice or a professional advocate (e.g. from another organisation).

Responsibility to report

Kiron staff and associates are obliged to report any concern or suspicion of exploitation and abuse of a minor or adult at risk. Failure to report may put the victim and Kiron at risk and is a breach of this Safeguarding Policy and of Associated Policies listed in this document. Kiron staff and associates should report concerns by a staff from other non-member organization or body through established reporting mechanisms. Kiron is committed to:

- Equip the members of the Kiron community with the necessary information to understand Safeguarding and recognise when there is a concern or signs of abuse
- Follow up on reports of safeguarding concerns promptly and according to due process
- Protect anyone that reports a safeguarding concern under the Whistleblowing Policy.
- Manage information confidentially
- Take safeguarding decisions in a timely manner and without unnecessary delay

Reporting

Kiron will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with. Any staff reporting concerns or complaints through formal whistleblowing will be protected by Kiron's Workplace Whistleblowing Policy. Kiron will also accept complaints from external sources such as members of the public, partners and official bodies.

Reporting Mechanisms

Staff members who have a complaint or concern relating to safeguarding should report it immediately to their Safeguarding Officer, the Safeguarding focal point for their team or their line manager. If the staff member does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member. For example, this could be a senior manager or a member of the HR Team.

Safeguarding staff members can be contacted via email:

1. Safeguarding Officer (global role): Elisabeth Roura - elisabeth.roura@kiron.ngo
2. Safeguarding focal point in Lebanon: Ibrahim Alaboud - ibrahim.alaboud@kiron.ngo
3. Safeguarding focal point in Jordan: Dina Abed Elkhalik - dina.abed.elkhalik@kiron.ngo
4. Head of HR: Rohit Kakar - rohit.kakar@kiron.ngo
5. Chief Operating Officer (Management Board Representative): Flora Kwong - flora.kwong@kiron.ngo

Students who have a complaint or concern relating to safeguarding should report it immediately to the Kiron Safeguarding team and can do it through three different channels:

- Reporting mechanism in the community space on Kiron Campus (information available to students on our Help Center, [in this article](#))
- Sending an email to safe-community@kiron.ngo or, alternatively, the most recognised contact email address of Kiron: student-support@kiron.ngo.
- If the student is in Jordan or Lebanon, the office's phone number will be available: Jordan (00962799967296) / Lebanon (0096171119529).

Recording and Information Sharing

Kiron complies with the General Data Protection Regulations (GDPR) and is committed to high standards in privacy policy. Given that all information about safeguarding concerns includes

personal data, it is important to be clear as to the grounds for processing and sharing information about concerns of abuse:

- Processing information includes record keeping via the Community tool on Kiron Campus and the email addresses described in the previous section.
- Safeguarding incidents or situations of concern will be collected in a Team Google Drive folder only accessible to the Safeguarding Officer and focal points in Jordan, Lebanon, as well as the Project Manager for Padileia.
- Records relating to safeguarding concerns must be accurate and relevant.
- Records must be stored confidentially with access only to those with a “need to know”. This does NOT automatically include the person’s family members, facilitators or team members.

Sharing information, with the right people, is central to good practice in safeguarding, but must be done with the consent of the person involved in the safeguarding concern. It is important to understand that the person may not always want information to be shared, this may be because they fear repercussions from the person causing harm or are scared that they will lose control of their situation to statutory bodies or because they feel embarrassed. Their wishes should be respected unless there are over-riding reasons for sharing information. The circumstances when we need to share information without the adult’s consent include those where:

- It is not safe to contact the adult to gain their consent – i.e. it might put them or the person making contact at further risk.
- The adult does not have mental capacity to consent to information being shared about them.
- the person causing harm has care and support needs
- Kiron believes they or someone else is at risk, including children.
- Kiron believes the person is being coerced or is under duress.
- Kiron believes it is necessary to contact the police to prevent a crime, or to report that a serious crime has been committed.

When information is shared without the consent of the adult this must be explained to them, when it is safe to do so, and any further actions should still fully include them. If you are in doubt as to whether to share information seek advice e.g. seek legal advice and/or contact the Local Authority and explain the situation without giving personal details about the person at risk or the person causing harm. Any decision to share or not to share information with an external person or organisation must be recorded together with the reasons to share or not share information in the incident report.

Investigation

Kiron will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations. If a member of staff is subject to safeguarding allegation they should be relieved of their duties while an investigation takes place. In compliance with labour law they are entitled to full pay while the investigation takes place. If a volunteer, contractor, or trustee is the subject of a safeguarding allegation they should be required to stop any work they are doing until an investigation has been completed.

Importantly, while an investigation takes place all those involved in the investigation should be supported, including the person whom the concern has been raised about. Disclosure of abuse in regards a member of staff, volunteer, contractor, trustee should be reported to the police and relevant authorities. Disclosure of a suspicion may not always be reported to the police, but a risk assessment and appropriate action (potentially using your disciplinary procedure) will be undertaken, and may result in police involvement.

If a Kiron student is subject to safeguarding allegation, they will be notified immediately via email and their Kiron account will be temporarily suspended until further investigation is carried.

Kiron will offer support to persons who experienced harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the persons who experienced harm, however Kiron's will refer to the support services available in each local context and in collaboration with NGOs that offer psychosocial support. For any matters regarding sexual or gender based violence or exploitation, resources and referrals through UNHCR's SGBV services are in place in [Jordan](#) and [Lebanon](#) with all Student Support Officers and staff having access to the information and hotline details.

Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Safeguarding reports will be filed in Kiron's backend database and only the Safeguarding Officer and focal points will have access to the cases. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

Monitoring

The Safeguarding Officer and Safeguarding focal points in the offices in Jordan and Lebanon are responsible for monitoring and implementing the Safeguarding Policy. Other Kiron team members, such as the Head of HR or Project Managers, are involved in part of the safeguarding procedures. Kiron will work proactively to create a positive safeguarding culture and a safe environment.

This policy was first developed and finalized in June 2021 and will be reviewed every three months during 2021 and 2022 to ensure the Safeguarding structure works appropriately.

Annex I: Harm and abuse

Main forms of harm:

1. Physical abuse results in actual or potential physical harm from an interaction or lack of interaction.
2. Emotional abuse includes the failure to provide a developmentally appropriate, supportive environment, including the availability of a primary attachment figure.
3. Sexual abuse is the involvement of a child or vulnerable adult in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child or vulnerable adult is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society. Sex with a child by an aid worker is always sexual abuse, even if it looks like there may have been consent.
4. Sexual or commercial exploitation includes using children or vulnerable adults to work or perform other activities for the benefit of others where the perpetrator profits monetarily, socially, politically, or in other ways where there is an exchange of gifts, cash, or in kind for sex.
5. Neglect or negligent treatment is the inattention or omission on the part of the caregiver to provide for the development of the child or vulnerable adult in all spheres.

Other sub-types of abuse:

- Traditional harmful practices are practices based on cultural beliefs and values.
- Spiritual abuse is using text from spiritual books or quoting scripture as an excuse to perpetrate abuse and violence or to instil fear in children and vulnerable adults.
- Modern slavery includes the crimes of human trafficking, slavery, and slavery-like practices.
- Financial and material abuse includes theft, fraud, exploitation and pressure in connection to wills, property, inheritance and financial transactions.

- Domestic abuse or intimate partner violence is any incident or pattern of incidents of controlling, coercive, or threatening behaviour, violence, or abuse of adults.

The following forms of harm may happen in the workplace, but not exclusively:

- Discriminatory abuse exists when values, beliefs or culture result in a misuse of power that denies opportunities to some groups or individuals.
- Bullying is behaviour directed either against an individual or a group of individuals that creates a threatening or intimidating environment.
- Harassment means unwelcomed verbal, non-verbal or physical conduct that is related to a person's characteristics, whether they are actual or perceived.
- Sexual harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another.