# Youth and Child Protection Policy

Written by :GPI Integrity OfficerApproved by:IEDApproved on:IED/SMT/Board/ED Socialization via GLT /final Board approval 06.09.2023For :GlobalNext Review:End 2028

### Introduction

Greenpeace is a global network of independent national and regional Greenpeace organisations (NROs) and Greenpeace International as a coordinating organisation. Whilst Greenpeace does not work routinely with children or young people as service users, volunteers or activists, there will be occasions when children, young people or other such vulnerable persons might come into contact with Greenpeace Persons (see definition below), campaigns or events and in order to cater for those cases, this model policy has been put in place. Greenpeace understands that children and young people are particularly vulnerable when it comes to abuse or exploitation and is fully committed to protecting all persons, especially vulnerable persons.

The UN Convention on the Rights of the Child says what countries must do so that children grow as healthy as possible, can learn at school, receive protection, have their views listened to, and are treated fairly. All children have these same rights, no matter who they are or where they come from. All rights<sup>1</sup> are connected, and all are equally important. Although Greenpeace is not a state party, it fully supports these principles and seeks to protect the safety, positive development and wellbeing of all children.

Every Greenpeace Person who comes into contact physically or otherwise e.g. digitally, with a child or young person has a duty of care towards them. We must all recognise the risks to children and young people and our part in keeping them safe and free from harm in all circumstances and environments. Therefore, all Greenpeace Persons must conduct themselves in a professional and respectful manner at all times, and act with the utmost integrity in all situations, particularly when working with children and young people.

Greenpeace has a Zero Tolerance approach to any form of abuse or exploitation of children and young people, including but not limited to, sexual, verbal or physical harassment, discrimination, assault and/or neglect. Any concern or complaint related to this is taken seriously when brought forward, and prompt and appropriate action shall be taken. Every accusation will be thoroughly investigated and any one found to have engaged in such actions will receive appropriate sanctions.

Greenpeace is committed to ensuring that our child and young person protection practices comply with best practices and ensure equal protection from all types of harm or abuse, without discrimination on any grounds, including age, disability, gender identity, race, national origin, religion or belief, sex or sexual orientation, or socio-economic background."

<sup>&</sup>lt;sup>1</sup> https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child

There is a responsibility that falls upon everyone who comes into contact with Greenpeace and its work, and Greenpeace Persons have specific roles in achieving this policy. Greenpeace should also expect safeguarding standards from all of our partners, contractors, suppliers and all third parties working with or for Greenpeace.

Greenpeace is committed to caring for the Earth, for communities that are impacted by climate and environmental crises, those that stand up for the protection and healing of the planet, and for each other as human beings. In our interaction with children and young people, we seek to protect their wellbeing and value, listen to and respect them with dignity. We are dedicated to upholding the principles of Justice, Equity, Diversity, Inclusion and Safety; JEDIS values in which this policy is grounded:

- Just. In our interaction with children and young people, we are accountable to them and empower them to hold us to account.
- Equitable. We enable children and young people to address systemic inequities, notably discriminatory norms, policies and behaviours.
- Diverse. In our interaction with children and young people, we embrace and sustain difference and plurality, and listen with dignity to and be challenged by a diversity of their voices, thoughts, viewpoints, perspectives and experience.
- Inclusive: we invite and amplify all children's and young people's voices, from any gender, race, geography, sexual orientation, age, physical and mental ability, education, body size, ethnicity, class, caste, religion, or any other characteristic.
- Safe: we build and sustain environments where children and young people are safe to be brave, have a sense of belonging, and create futures they deserve.

# 1. Definitions

- **1.1.** Children and Young People/Persons for the purposes of this document, Children and Young People or Persons will refer to any human being under the age of 18 years old<sup>2</sup>.
- 1.2. Greenpeace refers to Greenpeace Onlus Italia
- **1.3. Greenpeace Work** or **Greenpeace Operations** Planned activities by, for or on behalf of Greenpeace, including but not limited to activities involving volunteers, activists, consultants, freelancers or direct dialoguers.
- **1.4. Greenpeace Person -** this will include anyone who is employed by any of the Greenpeace organisations, or undertakes or participates in any activities for or on behalf of Greenpeace, including but not limited to volunteers, interns and trainees, activists, consultants, freelancers or direct dialoguers, Board

<sup>&</sup>lt;sup>2</sup> Differences exist among the various ages of consent. When it comes to consent, specific age definitions proposed by law are different across different jurisdictions. The purpose of this definition section is, like in Article 1 of the UN Convention on the Rights of the Child, to set the ceiling: as this provision reads, it concerns persons aged up to 18.

members and Voting Assembly members. It is expected that Greenpeace Persons and anyone who undertakes or participates in any activities for and on behalf of Greenpeace, including contracted partners, are committed to safeguarding children and young persons. That everyone who represents or partners with Greenpeace must actively work to create a safer environment for the children and young persons who come in contact with the organisation.

**1.5.** The UN Convention - refers to the <u>UN Convention on the Rights of the Child</u> <u>1989</u>.

# 2. Detail Policy Statement

## 2.1. Zero Tolerance

Greenpeace has a Zero Tolerance approach to any form of abuse or exploitation of children and young people. This includes Zero Tolerance towards enabling any form of abuse or exploitation of children and young people. Zero Tolerance means all concerns will be treated with the utmost seriousness, investigated and if the investigation upholds the complaint prompt action will be taken. Responsible Greenpeace Persons are subject to appropriate disciplinary action, possibly including termination of their employment or relationship with Greenpeace and/or reporting breaches to the relevant local authorities.

- 2.1.1. Greenpeace does not tolerate any form of abuse or exploitation of children and young people. This includes enabling any form of abuse or exploitation of children and young people.
- 2.1.2. Greenpeace Persons will not engage in any form of abuse or exploitation of children and young people. Abuse or exploitation includes:

Abuse can take many forms could include, but not limited to:<sup>3</sup>

- Physical abuse involves the use of violent physical force so as to cause actual or likely physical injury or suffering.
- Sexual abuse the use of a children or young persons for sexual purposes, this may include rape, sexual assault or sexual acts, the accessing or production of indecent images or using the internet, mobile technology or social media to communicate inappropriately with a child, engaging a child sexually regardless of consent or a mistaken belief as to their age.
- Sexual Exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual

<sup>&</sup>lt;sup>3</sup> Accountable Now, Safeguarding Policy

purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

- Psychological abuse emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidating, coercion, harassment, verbal abuse, isolation or withdrawal from services or support networks.
- Discriminatory abuse ageism, racism, sexism, based on disability, sexual orientation, religion, or other forms of harassment, slurs, or hate-crime.
- Labour exploitation Exploitation of labour is a concept defined as, in its broadest sense, one agent taking unfair advantage of another agent. It denotes an unjust social relationship based on an asymmetry of power or unequal exchange of value between workers and their employers
- any other actions which result or can be expected to result in harm to the child's health, survival, development or dignity.")
- 2.2. Greenpeace is fully committed to ensuring that when young persons and children come into contact with Greenpeace, **all rights and protections granted under the UN Convention are respected and protected**. This includes, but is not limited to ensuring that young people and children:
  - Have equal rights to protection from abuse and exploitation;
  - Are encouraged to fulfil their potential and inequalities are challenged; and
  - Are protected and supported by all persons.
- 2.3. All Greenpeace Persons interacting with children or young people, either online or in person, shall do so in a lawful and respectful manner that **promotes the safety, positive development and wellbeing of children and young people in accordance with local/national laws.** Further Greenpeace will ensure that children and young people are well informed about and understand the activities they engage in with Greenpeace (including the risks).
- 2.4. Greenpeace Persons, if **making contact with children or young people** that they have met through Greenpeace work or activities for non Greenpeace purposes, including through the use of social media, must be guided by this policy and the Global Model Code of Conduct.
- 2.5 Greenpeace pays particular attention to child protection and safeguarding issues when processing recordings (in photo, video or any other format) that contain information about children or young people who are identified or identifiable. "Processing" means any kind of use, including gathering, storing, using and sharing.

In all cases, Greenpeace will ensure that the processing complies with local law and that there is a proper basis for it, examples may include:

- The young person gives informed consent to the specific processing; or if it concerns a child or a young person who is not able to consent according to the law, a person who holds parental responsibility gives such consent; and/or
- Greenpeace has a legitimate interest in the processing, and after careful consideration, we are confident that the processing won't cause any unjustified harm to the child's or young person's rights and interests; and/or
- Processing the recording is necessary to comply with the law or to protect the vital interests of the child or young person.

Whenever we request consent to process a recording of a child or young person, we ensure that:

- We use simple, understandable language
- We explain who we are
- We explain clearly what we are asking consent for:
  - where the recording will be stored and archived, and for how long
  - with whom it will be shared (including any other Greenpeace organisations or third parties)
  - where, how and for which reasons it might be used in publications
- We explain how consent could be withdrawn in future (without retroactive effect).

Greenpeace recognises that;

- Sharing photographs and films help us celebrate the successes and achievements of children and young people and provide a record of their activities
- the welfare of the children and young people taking part in activities that we capture is paramount

- children, and where relevant, the holders of parental responsibility, may decide whether their images are taken and how these may be used
- consent to use images of children is only meaningful when children, their parents and carers understand what the use entails and are aware of the potential risks associated with the use and distribution of these images

In addition to the above, the following applies:

### Gathering

Greenpeace will ensure the safety and wellbeing of children and young people while gathering images of them. Even when not required, we still strive to seek consent from the appropriate person, which depending on age and local law may be a holder of parental responsibility, to the extent reasonable and appropriate

### Storage

Greenpeace will ensure that images are stored in accordance with local regulatory data protection requirements, and in jurisdictions where these are weak or do not exist, will be guided by good international practice, as reflected, for example, in the EU General Data Protection Regulation.

### Use

We will not use recordings of children or young people who are identified or identifiable for fundraising purposes, except with specific consent. In other contexts, in line with the above, we will only use such recordings without specific consent if we have a legitimate interest to do so, and we are confident, after careful consideration, that the processing won't cause any unjustified harm to the child's or young person's rights and interests.

### **Sharing and Distribution**

We will particularly, carefully scrutinise any request from a third party to share any Greenpeace recording in which a child or young person is identified or identifiable according to the guidelines stated above.

### **Raising Objections**

Greenpeace will provide a process and tools to raise concerns that are also easy to access by the person/s concerned to request access to a recording of a child or young person, to ask for information about why and how it has been used and shared, to object its use, to request a restriction in terms of how the recording is used, and to request its erasure.

## 3. Reporting

Any potential violations of this policy should be reported immediately to the GPI Integrity Officer.

- 3.1. All Greenpeace Persons have an obligation and are being called on to immediately report any concerns, whether witnessed or disclosed, about alleged or suspect abuse or harm of any child or young person who is in contact with or impacted by Greenpeace work. This requirement applies to reported or suspected abuse by any Greenpeace Person. Reports may be made anonymously, although the availability to investigate may be limited in such circumstances, and the reporting individual will not be subject to any retaliation by the organisation or any Greenpeace Persons for their report. Any retaliation that the reporter faces will be dealt with seriously and quickly and anyone found to be involved and/or bear responsibility in the retaliation will be subject to disciplinary action.
- 3.2. Reporting of concerns should take place as soon as practical, allowing for time zone differences. Failure to report any observations or disclosures will be addressed without delay as soon as known and the responsible person may be subject to appropriate disciplinary action, up to and including termination of their employment or relationship with Greenpeace.
- 3.3. There are several options to report a suspicion of a violation of this Policy. There are different contact persons within Greenpeace, and you can choose who to report to from the list below.
  - 3.3.1. Child Protection Officer

Greenpeace has a Child Protection Officer. Any Greenpeace Person or external person can contact the Child Protection Officer in the case of a suspected violation, if you feel that you may have committed a violation yourself, or if there are generally any concerns about the wellbeing of children or young people. The Child Protection Officer will take all reasonable steps and precautions to ensure that immediate protections are put in place when necessary, and to ensure a potential breach is fully investigated. Where appropriate, the Child Protection Officer will also be responsible for reporting breaches to the relevant local authorities.

The Greenpeace Child Protection Officer is Marzia Ventimiglia

#### 3.3.2. Managers

Any Greenpeace Person can contact their manager in the case of a suspected violation, or if you feel that you may have committed a violation yourself. In the case of non-employees, any person can contact the person who exercises a duty of care for you, for example, your local volunteer coordinator or action coordinator or the CPO of the Greenpeace entity involved. The manager (or other relevant person) MUST report a suspected violation to the Child Protection Officer. If you have reported a suspected violation and no action has

been taken, or if the suspicion is about your manager (or other relevant person) you should contact the Child Protection Officer directly, or take the issue further up the chain of command to the next level of management.

### 3.3.3. Whistleblower

The Whistleblower Procedure also always applies to this policy. You can whistleblow by contacting the Compliance Officer or by e-mail SEGNALAZIONI.IT@GREENPEACE.ORG; or by letter to the attention of the Whistleblower Policy Compliance Officer if the report should be in paper form; or,In cases where the reporting person has reason to believe that the Compliace Officer may be biased, or where the reported persons are on the Board of Directors itself, the person may contact Greenpeace International directly, either by email to: whistleblowers@greenpeace.org, or by writing a letter to the contact details of Greenpeace International (available at www.greenpeace.org) to the attention of the "SGC Board Chair"

2.8.3.1 If you have good reason not to trust the existing channels of reporting (for instance based on past experiences) you may go to the Board.

2.8.3.2 If the suspected violation is severe and involves the actions and/or complicity of the Executive Director and/or Senior Management, you may go directly to the Board via the "Compliance Officer" at the Board level as stipulated in the Whistleblower Procedure.

It is also possible for non-Greenpeace Persons to raise concerns or make reports to any of the channels outlined above. This includes the parents and/or guardians of young people and children. Non-Greenpeace Persons can also directly contact the Global Integrity Officer, whose contact details will be made available on the external website. The Global Integrity Officer will then redirect where applicable. In addition, due to the sensitivity of issues such as these, non-Greenpeace Persons may be able to raise concerns or reports directly with the Executive Director.

## 4. Procedures for Prevention

- 4.1. Raising awareness, access to information and training.
  - 4.1.1. All Greenpeace Persons will be informed about this Policy; always when newly employed and otherwise through regular re-training and updating, and regular communication for raising awareness. This will include information about:

- What constitutes abuse or exploitation of a young person or child.
- The correct procedures to follow in the event of being affected by, or witness to, any form of harassment.
- 4.1.2. Because of the sensitive nature of potential violations, Managers and Persons of Trust must receive and make time to take specific training about:
  - Responsibilities in monitoring possible incidents of abuse or exploitation in their teams.
  - Roles in the event that an incident is reported.
  - How to respond sensitively to the report, how to advise a person who has made a report, and how to advise about the support available to them or an affected person.

This training may be combined with training for all Integrity policies and/or HR policies.

- 4.1.3. In addition to the training, all new Greenpeace Persons will receive an induction on Integrity and HR at Greenpeace.
- 4.1.4. The Child Protection Officer will share information about effective prevention mechanisms and training practices in order to continually update and deliver training and awareness. Such training programmes will not be one-off events, but a continual process of updating and revalidating. It is also important to consider sharing information about the policy externally in order to allow for increased awareness among external stakeholders.
- 4.1.5. Consideration of using safe, transparent recruitment processes where applicable and in line with local laws and regulations must be in place, for example, requesting a signed-off criminal records check (*where staff come into contact with children*) and/or positive references that confirm that the referees are not aware of any reason why the applicant should not work with children. These processes should be decided on a local level, and need to be in line with local laws and regulations as well as assessed for applicability.

## 5. Monitoring and Documentation

5.1. Monitoring

Managers (together with Policy Owner) must ensure that all Greenpeace Persons in their teams or under their duty of care have participated in the training outlined above. They should also monitor whether all these persons have received and understood this Policy. They must also ensure that they themselves have taken the training and received this Policy.



#### 5.2. Documentation

The Child Protection Officer is responsible for documenting the number of reported cases of abuse or exploitation of young people or children, as well as ensuring that the correct procedures and protocols are followed in each case. The Child Protection Officer will then ensure that it is taken into account in the regular vulnerability and risk analyses.

### 6. Handling potential Violations

Handling of potential violations should be assumed to be in line with the pre-existing complaints procedures (*Handling of Suspected Integrity Violations*). However, if a breach of this policy did arise, it would be recommended in the vast majority of cases that the investigation is outsourced to local experts, given the potential complexities and sensitivities of potential situations and to ensure that the relevant expertise are applied in the investigation.

Violation of this Policy will be considered with the seriousness that the topic requires, and will involve thorough investigation. Depending on the outcomes of the investigation and other circumstances, disciplinary action may be taken against the responsible Greenpeace Person, or other HR recommendations may be made, for example training or monitoring requirements.

Owing to the specific nature of cases of abuse or exploitation of young people and children, some additional measures are indicated in the handling process:

 It is important to be aware of the applicable legal requirements for reporting abuse or exploitation of young people or children in the local country. Greenpeace might hold itself to a higher standard than some national legislations. If a victim or their parent or guardian chooses to take legal action, those taking action must be informed by the Greenpeace Child Protection Officer of the fact that the laws that will apply may be different from the internal Greenpeace standards. Where local legal requirements may be of a higher standard than in this policy, Greenpeace organisations shall adhere to the higher standards.

### 7. Confidentiality and Information Sharing

All Greenpeace Persons must be aware that while they have a duty to keep any information about children, families and colleagues confidential to the extent possible. They may also have a legal and professional responsibility to share information internally and/or externally, if it is necessary to protect children or young people and required by this policy or applicable laws.

When information is shared within the organisation, confidentiality must be maintained to the maximum extent possible, at all stages in the process when



dealing with child protection concerns. Information relating to the concern and subsequent case management should be kept secure at all times and shared only with those who are necessary for handling the case. Greenpeace will ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored to the extent appropriate.

### 8. Validity and Revision Status

To be reviewed every three years, or sooner if applicable or appropriate.

# **Annex: Implementation Plan**

Activity	Timeline	Status
Approval of the Policy	2023	<ul> <li>IED Approved 23/09/2022</li> <li>SMT Approved 13/12/2022</li> <li>GLT Circulated / comments with approval - 17/8/2023</li> <li>Board Approved - 6/9/2023</li> </ul>
Socialisation of the policy to the global organisation (e.g. GLT/EDs / Integrity Community & Global HR)	Qtr 3 2023	Approved with 3 changes
Identify training needs and requirements for designated Child Safeguarding Officers (e.g. Child Safeguarding Training, Training on dealing with violations of the policy ). Implementation plan shared	Qtr 4 2023	Complete
Training and implementation guidance is shared and management processes assessed to include Youth and Child Protection, e.g. screening of staff and volunteers and selection, Inductions, library and images	Qtr 2 2024	Started