

**EWDE**

Evangelisches Werk  
für Diakonie  
und Entwicklung

# Child Protection Policy

of the Evangelisches Werk für Diakonie  
und Entwicklung e. V.



**Evangelisches Werk für Diakonie und Entwicklung e. V.**

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## 1. Introduction

### 1.1 Background information

Half of the world's population is under 30 years old. In many of the countries where Brot für die Welt (Bread for the World) and Diakonie Katastrophenhilfe (Diakonie Emergency Aid) fund projects, the majority of the population is under 20. Of the world's 1.9 billion children aged under 18<sup>1</sup>, roughly 1 billion live in poverty. For this reason, development cooperation and humanitarian aid projects, which either directly or indirectly improve the lives of children, are particularly worth supporting. At the same time, children are in particular need of protection. Protecting children's interests as well as their physical and mental well-being is an integral human right and must therefore be a core component of all the activities carried out by the Evangelisches Werk für Diakonie und Entwicklung e. V. (Protestant Agency for Diakonie and Development, EWDE).

In every country and society, children suffer violence and exploitation. Data from the criminal statistics maintained by the German police on the extent of violence against children tell only part of the story due to the many offences that are not reported. Reliable statistics concerning violence against children are also lacking on a global level, with estimates ranging from 500 million to 1.5 billion<sup>2</sup>. The most serious crimes, including forced marriages, child labour, genital mutilation, child trafficking and forced prostitution continue to affect millions of children worldwide.<sup>3</sup> It can also be assumed that, for example, disabled children are affected even more frequently due to their particular vulnerability. All countries are increasingly confronted with the problem of depictions of child abuse, previously termed child pornography. These crimes are usually disseminated via the internet and digital media.

Although children are primarily subject to violence and exploitation within their own families, the risk of abuse from outside the family – due to the dependent nature of the relationships involved – should also not be underestimated, for example in institutions or while travelling or staying abroad. This also concerns the EWDE and employees who travel for work or who work in its offices abroad (or in associated offices), as well as contracted experts and volunteers. Their role places them in a position of power that demands a particularly high level of sensitivity.<sup>4</sup>

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<sup>1</sup> Throughout this text, the term “child” is used in accordance with the UN Convention on the Rights of the Child (0–18 years). It thus covers “children and youths” up to the age of 18.

<sup>2</sup> Source: Global Survey on Violence against Children: [https://violenceagainstchildren.un.org/sites/violenceagainstchildren.un.org/files/global\\_survey/toward\\_a\\_world\\_free\\_from\\_violence\\_02\\_23\\_2016.pdf](https://violenceagainstchildren.un.org/sites/violenceagainstchildren.un.org/files/global_survey/toward_a_world_free_from_violence_02_23_2016.pdf)

<sup>3</sup> Source: [www.unicef.org/media/70731/file/Global-status-report-on-preventing-violence-against-children-2020.pdf](http://www.unicef.org/media/70731/file/Global-status-report-on-preventing-violence-against-children-2020.pdf)

<sup>4</sup> Analyses by law enforcement authorities in the United Kingdom and the Netherlands support this assumption about the risk of abuse by travellers abroad. 15–20 percent of all suspected cases of sexual abuse are linked to foreign aid workers (in the areas of development cooperation, humanitarian aid, as well as volunteers and short-term volunteers) ECPAT International (2016): Offenders on the Move – Global Study on Sexual Exploitation in Travel and Tourism. [www.protectingchildrenintourism.org/wp-content/uploads/2018/10/Global-Report-perpetrators-on-the-Move.pdf](http://www.protectingchildrenintourism.org/wp-content/uploads/2018/10/Global-Report-perpetrators-on-the-Move.pdf)

Organisations that carry out development cooperation and humanitarian aid, as well as their local project partners, frequently work in delicate situations in which the protection of children is not prioritised. These organisations must acknowledge the risk of potential perpetrators seeking access to children and take preventive measures to minimise this risk. The World Council of Churches' "Commitment to Children" and the ACT Alliance's "Child Safeguarding Policy", as well as the EKD's (Evangelical Church in Germany) Protection against Violence Policy, all serve this purpose. The Catholic and Protestant Churches in Germany also underlined their commitment by signing the "Agreement on the Implementation of Recommendations drafted by the Round Table on Sexual Child Abuse for a Supplementary Assistance System" in 2013.

## **1.2 Christian ethics of responsibility**

The Church and Diakonie want to support children in their development and self-actualisation. According to the Biblical creation story, human existence is based on its relationship to God as the creator of humankind. Human dignity is reflected in the idea that humans were created in God's image. This applies to all human beings, and in particular children, to whom, in Jesus' words, "the kingdom of God belongs" (Mk 10:13-16).

However, the concept of humans being made in God's image has less to do with the origins of human dignity than in its end goal. The goal of human dignity is for humans to have positive relationships and take responsibility for these relationships, in order to develop a culture of attentiveness and care. Actions are judged according to what serves life and living together, what preserves, supports, and enriches life.

Christian ethics demand that the human dignity bestowed by God is acknowledged and protected. However, those who commit violence are also asked to abandon customary structures of violence. They, too, must acknowledge the dignity and right to freedom of those against whom they have used violence. From a Christian perspective, people who become aware of violence are also obliged to offer solidarity to victims and to help ensure that justice prevails. If life is to succeed despite the reality of human imperfection, then actions have to be clearly recognised and named so that constructive solutions can be sought.

The EWDE thus sees itself as having a particular responsibility to offer effective protection to children. Together with its institutions and services in Germany and partner organisations around the world that work with children, the EWDE must be judged according to how it fulfils this responsibility.

## **1.3 Rights of the child**

Children have the right to be protected from all forms of violence and exploitation. Most countries have criminal and social laws that protect children – including those with disabilities – and prosecute perpetrators. In some countries, however, the state's legal system lacks sufficient resources to promptly and effectively deal with perpetrators and guarantee children's rights. The extra-territorial legislation that exists in Germany and many other countries for dealing with sexual crimes against children enables law enforcement authorities to pursue perpetrators even after they have returned to their home country.

National legislation is based primarily on the UN Convention on the Rights of the Child<sup>5</sup> as well as its optional protocols, which apply internationally. The Convention defines a child as “any human being below the age of 18”. It contains several fundamental principles that have particular significance in the area of child protection, including the principle of the child’s welfare, the principle of non-discrimination, the right to live and develop, and respect for the child’s opinion. Violence against children is defined using different terminology, depending on the context. The EWDE follows the definition provided by the WHO (see Annex 6.1) according to which all forms of violence against children are to be understood as child abuse<sup>6</sup>. According to the Luxembourg Guidelines, the term “depictions of the sexual exploitation of children” encompasses both depictions of sexual abuse as well as sexual content involving children, which are referred to as child pornography in the criminal laws of almost all countries.<sup>7</sup> The internet and digital media are becoming an ever more important means of making contact with children.

The UN Convention on the Rights of the Child provides the moral and legal foundation for the EWDE, together with that of its members and partner organisations, to commit to protecting and promoting the welfare of girls and boys up to the age of 18 in its institutions and services in Germany, as well as in the projects it funds around the world. The Convention on the Rights of the Child and its optional protocols thus serve as the binding frame of reference for the present Child Protection Policy. Furthermore, Brot für die Welt and Diakonie Katastrophenhilfe are members of the Verband Entwicklungspolitik und Humanitäre Hilfe (the umbrella organisation for development and humanitarian aid NGOs in Germany, VENRO) and the ACT Alliance. The VENRO Code of Conduct on children’s rights<sup>8</sup> and the ACT Code of Conduct for the prevention of sexual exploitation and abuse, fraud and corruption and abuse of power,<sup>9</sup> as well as the Evangelical Church in Germany’s Policy for protecting against sexual violence<sup>10</sup> of October 2019 are thus also important foundations for the current Child Protection Policy. In terms of content, it reflects the ACT Alliance Child Safeguarding Policy, which was adopted in May 2015 and calls on all member organisations to develop their own child protection policy within two years.<sup>11</sup>

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<sup>5</sup> UN Convention on the Rights of the Child from 20 November 1989. The current version is available at [www.ohchr.org/Documents/ProfessionalInterest/crc.pdf](http://www.ohchr.org/Documents/ProfessionalInterest/crc.pdf)

<sup>6</sup> The EWDE understands the rejection of the term “abuse” by many victims, who point out that the term “abuse” implies that human beings can also be “used” in a positive way. It should therefore be stressed that the term “abuse” is only used in this Child Protection Policy because it is firmly established in legal terminology.

<sup>7</sup> Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse, adopted by the Interagency Working Group in Luxembourg, 28 January 2016. The English version is available at <http://luxembourg.guidelines.org/english-version/>. The Terminology Guidelines help to achieve greater clarity when using particular terms.

<sup>8</sup> VENRO (2011): VENRO Code of Conduct on children’s rights: Protecting children against abuse and exploitation in development cooperation and humanitarian aid. First approved on 13 December 2007, most recently amended on 16 December 2010. Available at [https://venro.org/fileadmin/user\\_upload/Dateien/Daten/Publikationen/VENRO-Dokumente/VENRO\\_Code\\_of\\_Conduct\\_Child\\_Rights.pdf](https://venro.org/fileadmin/user_upload/Dateien/Daten/Publikationen/VENRO-Dokumente/VENRO_Code_of_Conduct_Child_Rights.pdf)

<sup>9</sup> ACT Alliance (2011): ACT Alliance CODE OF CONDUCT for the prevention of sexual exploitation and abuse, fraud and corruption and abuse of power. Available at <https://actalliance.org/wp-content/uploads/2019/08/ACT-Code-of-Conduct-Policy-2016-E.doc.pdf>

<sup>10</sup> [www.uek-recht.de/document/44830](http://www.uek-recht.de/document/44830) (available only in German)

<sup>11</sup> [http://actalliance.org/wp-content/uploads/2015/07/Child-Safeguarding-Policy\\_English.pdf](http://actalliance.org/wp-content/uploads/2015/07/Child-Safeguarding-Policy_English.pdf)

#### **1.4 Aims and scope of the EWDE Child Protection Policy**

The EWDE is committed, in its work in Germany and abroad, to supporting the rights of children and protecting children from all forms of violence and exploitation in its immediate sphere of influence. The aim is to create an environment that is safe for children and in which the protection of children's rights as human rights is guaranteed. This applies both to children in the foreign programmes and projects funded by the EWDE, as well as all EWDE activities within Germany.

For this reason, the EWDE is introducing the Child Protection Policy, which will establish – both directly, within the organisation, and indirectly, in the context of financial and staff-related work with third parties– measures to protect children, to minimise the risk of violence, and, in the case of suspected harm to a child, to guarantee transparent procedures. Clear codes of conduct as well as effective and transparent control and complaint mechanisms ensure a high level of protection for children. Every EWDE employee in Germany and abroad is obliged to draw attention to potential risks and, where a child's welfare appears to be endangered, to react immediately and appropriately, in line with this Child Protection Policy.

The EWDE is establishing the protection of children and the following standards as a quality feature of its work both in Germany and abroad. The organisation and its employees are committed to:

- supporting the rights of children with and without disabilities and protecting them from all forms of violence, exploitation, and neglect;
- creating a (real and virtual) environment which is safe for children and in which the protection of children's and human rights are guaranteed;
- involving children in measures that affect them and considering their interests when planning the implementation of project activities;
- creating awareness and sensitivity towards the topic within the EWDE, its foreign offices and partner organisations;
- developing and implementing suitable strategies, including clearly defined responsibilities and procedures, in the areas of prevention, crisis management and monitoring, and ensuring that they are complied with;
- ensuring that the dignity of children is respected in press, educational and PR work;
- raising awareness of the issues among decision-makers in politics and business.<sup>12</sup>

Where power is involved, there is always a risk of abuse. The binding implementation of the Child Protection Policy aims to raise awareness of the topic among all employees and partner organisations and establish clear rules for acting in all cases where a child may be at risk of harm.

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<sup>12</sup> The bullet points, with minor modifications, are taken from VENRO (2011): VENRO Code of Conduct on children's rights: Protecting children against abuse and exploitation in development cooperation and humanitarian aid. First approved on 13 December 2007, most recently amended on 16 December 2010. Available at [https://venro.org/fileadmin/user\\_upload/Dateien/Daten/Publikationen/VENRO-Dokumente/VENRO\\_Code\\_of\\_Conduct\\_Child\\_Rights.pdf](https://venro.org/fileadmin/user_upload/Dateien/Daten/Publikationen/VENRO-Dokumente/VENRO_Code_of_Conduct_Child_Rights.pdf)

The policy represents a consistent and coordinated system for protection against violence and exploitation. It **applies to all EWDE employees in Germany and abroad** and is also aimed at **the regional and country offices of Diakonie Katastrophenhilfe and the Brot für die Welt regional offices abroad, as well as at experts, volunteers, assistants, interns, committee members, service providers, consultants and journalists** who travel to project countries and come into contact with children there on behalf of the EWDE.

### **1.5 Parties responsible for implementing the EWDE Child Protection Policy**

A **Child Protection Team** is set up within the EWDE and is assisted by a **Child Protection Officer**, appointed by the Executive Board.

The Child Protection Team consists of the Child Protection Officer and at least five EWDE employees, each from a different department. The members are trained in child protection, possess appropriate expert knowledge, and receive continuous training. The Child Protection Team has the resources necessary to do its work.

The Child Protection Team is in charge of implementing the Executive Board's recommendations on suitable approaches and strategies, dealing with cases of suspected violence against children under the guidance of the Compliance and Risk Management Staff Unit, advising colleagues at the EWDE, initiating training within the EWDE, and monitoring and modifying the Child Protection Policy. Employees of the EWDE as well as others working on behalf of the EWDE can obtain **confidential advice** from the Child Protection Team on issues relating to child protection.

The Child Protection Team works closely with the Compliance and Risk Management Staff Unit on specific cases and manages the cases freely and independently.

## 1.6 Diagram: Elements of the Child Protection Policy



## 2. Preventive measures for protecting children in the EWDE

### 2.1. EWDE Code of Conduct

Our aim is for EWDE employees who come into contact with children, for volunteers and experts who travel abroad with the EWDE, for people who visit the projects or provide services, as well as for other individuals who have contact with children while working in any form for the EWDE, to take responsibility for child protection collectively. In addition, they should be protected from false accusations regarding their conduct towards children.

The EWDE takes steps to promote suitable behaviour and thus raise awareness among employees and all the other groups of people mentioned above who travel for projects or participate in activities in Germany or abroad, as to how conduct themselves around children. The EWDE Code of Conduct, which includes a section on child protection, was developed for this purpose. The Code of Conduct is part of all employee contracts and also applies to and is integrated into the contracts of all the other groups of people mentioned above.

### 2.2 HR policy standards

In its efforts to ensure a safe environment for children, the EWDE also makes use of basic preventive measures in its human resources management, as will be explained in this section. The EWDE is aware that even a careful approach to selecting and recruiting staff cannot offer one hundred percent protection against the risk of employing potential perpetrators. However, actively engaging with the topic of child protection sends a clear signal that the service provider is very aware of the issue, which will deter potential perpetrators.

#### 2.2.1 Employment procedure and assessing positions

All employees are required to actively contribute to creating a culture of awareness and safety for the children who are linked to the services provided by the EWDE, as well as for the organisation and themselves.

In the case of all job openings, we check in advance whether the employee will be in direct or indirect contact with children. If the work requires the individual to be in direct contact with children, an extended criminal record certificate is required. The EWDE's commitment to child protection is brought up during job interviews. The importance placed on child protection is thus already made clear to potential employees.

#### 2.2.2 Extended criminal record certificate

All EWDE employees whose work brings them into contact with children are obliged to submit an extended criminal record certificate<sup>13</sup>. This certificate must be re-submitted every five years.

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<sup>13</sup> In contrast to a "basic" criminal record certificate, the extended certificate informs, in addition to convictions for offences pursuant to Sections 174–180 and 182 of the German Penal Code (Strafgesetzbuch, StGB), about other sexual offences specified in Section 32(5) of the German Federal Central Criminal Register (Bundeszentralregistergesetz, BZRG) whose disclosure always serves the protection of children. Other countries may also request similar criminal record certificates.

The EWDE bears the costs for the regular review and issues the request to the authorities. Evidence of any legal conviction in Germany or in another country for a sexual offence against children or for human trafficking represents grounds for exclusion from employment.

In the case of all new employment positions, checks are also carried out as to whether an extended criminal record certificate is required, for example if the position involves direct contact with children. Employees and applicants are informed of this requirement.

A check is also carried out as to whether the requirement to submit an extended criminal record certificate has been fulfilled in the case of all EWDE employees who travel abroad for work. The need for employees who travel abroad for work to submit an extended criminal record certificate is linked to their special position and any increased risk of abuse of power. More specific details are determined by the implementation rules agreed upon with the Employee Representative Committee.

All experts and volunteers as well as persons who will deal with children on behalf of the EWDE must present an extended criminal record certificate before they can travel abroad.

### **2.2.3 Personnel development**

All employees are made aware of the topic of child protection and receive ongoing training appropriate to their tasks and functions. Child protection also plays an important role on the welcome day for new employees as well as additional information days on strategic topics. Particular emphasis is placed on training project staff members who are involved in dialogue with partners. Human resources managers must also ensure that employees who travel abroad for work are made aware of the topic of child protection.

### **2.2.4 Preparation courses for volunteers and experts**

The core contents of the Child Protection Policy are an integral part of the preparation seminars. Participants are also made more aware of their own behaviour. This includes public communication in the context of events and on social media. The curriculum also covers additional issues relevant to the welfare of children, such as how to recognise signs of sexual abuse and the strategies used by perpetrators. The primary aim of the seminar is to raise awareness of one's own actions and values, of the special responsibility that exists in relation to children and vulnerable persons, as well as how to manage cases of suspected abuse.

## **2.3 Communication standards**

Public reporting on foreign projects as well as domestic activities carries the risk of infringing upon children's rights. To protect the children concerned from the risk of violence or stigmatisation, the EWDE ensures that all media content<sup>14</sup> that it produces and distributes respects the dignity of children and protects their identity.

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<sup>14</sup> Media content includes all representations of children and their environment in text, sound, image, and film.

The EWDE informs reporters of the potential risk to children that this work involves – particularly children who are already in a vulnerable position.

### **2.3.1 Public reporting in the context of humanitarian aid**

Emergencies and catastrophes are usually directly linked to public reporting. This takes place in an environment in which children are exposed to greater risk of being sexually or otherwise abused, as protective systems may no longer be functioning.

It is therefore especially important to observe the general communication standards in the context of humanitarian aid and to put specific measures in places to protect particularly vulnerable children. The aim is to avoid stigmatising children affected by emergencies, to prevent them from being exposed to additional danger, and to respect their dignity, no matter what form of reporting is involved.

### **2.3.2 Binding guidelines for external reports**

All external reporters are obliged to observe ethical standards by signing the “Guidelines for Press Trips” prior to visiting a project or reporting on activities within Germany and submitting it to the department providing the contract.

Employees of the EWDE and its partner organisations are obliged to inform the EWDE of any infringement of the guidelines that takes place within the context of project visits facilitated by the EWDE.

## **2.4 Domestic programmes**

When applications are being reviewed, (particular) attention is paid to the respectful representation of all people, including children. Sexist or otherwise denigrating content, for example in scripts, thus represents grounds for exclusion.

The written guide to development-focussed exchange programmes contains information on child protection. Furthermore, the domestic programmes website informs applicants at an appropriate stage of the existence of the EWDE Child Protection Policy.

## **2.5 Information Technology (IT)**

The EWDE’s computer network has a firewall system that complies with international standards. The firewalls for both the internal system and the guest network have filters to prevent the downloading of illegal files. The IT department tests the firewall settings every six months.

Employees who need to access blocked web pages for their work require special permission from their supervisor.

### 3. Intervention – complaint mechanism and case management

#### 3.1 Aim

The EWDE has a Complaint Mechanism – in other words, an institutionalised procedure for dealing with evidence of wrongdoing in the areas of corruption/fraud/embezzlement, endangering the welfare of children, abuse, sexual violence and other violations of legal provisions, as well as other significant violations of internal rules and regulations (for example, concerning the EWDE Code of Conduct).

The EWDE Complaint Mechanism allows for reports of suspected cases to be received and processed efficiently by qualified staff. The EWDE Complaint Mechanism enables:

- **early recognition of potential danger to a child’s welfare,**
- an **appropriate reaction** to the situation in suspected cases and
- **introduction of necessary measures to protect the child.**

All decisions within the complaint management system concerning cases of suspected harm to children are based on protecting children’s welfare.

Transparent documentation ensures that information reaches relevant parties. All EWDE employees are made aware of the EWDE Complaint Mechanism and informed about contact persons both within and outside the organisation and the relevant procedures<sup>15</sup>.

Partner organisations (see Section 4) are informed of the EWDE Complaint Mechanism and instructed, in turn, to inform target groups, in particular children, about the mechanism (in addition to their own mechanism).

#### 3.2 Dealing with suspected cases (key points)

Information and complaints can be passed to the EWDE in various ways – anonymously via an external ombudsperson independent of the EWDE, directly via the Child Protection Team or via the EWDE Complaint Mechanism’s various communication channels (e.g. Integrity Team<sup>16</sup>, Complaint Focal Points<sup>17</sup> in the external offices of Brot für die Welt and Diakonie Katastrophenhilfe). An interview guideline for complaints has been created (see Annex 6.3). Due to the grave consequences of violence against children and the need to separate victims and perpetrators as quickly as possible, every report leads to the immediate initiation of case management proceedings and, if required, additional measures. A processing team – guided by the Integrity

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<sup>15</sup> EWDE Complaint Mechanism procedure in eleven steps (see Annex 6.2).

<sup>16</sup> The Integrity Team is made up of the Compliance and Risk Management Staff Unit and the Officer for Law & Compliance from the Legal Services Department.

<sup>17</sup> Trusted persons at the external offices of Brot für die Welt and Diakonie Katastrophenhilfe. The Focal Points serve as points of contact. In connection with the whistleblowing system and the external offices of Brot für die Welt and Diakonie Katastrophenhilfe, the Focal Points are responsible for receiving compliance-related cases on behalf of the Integrity Team in Berlin and passing them on to the Team if necessary.

Team and including, as a matter of necessity, representatives from the Child Protection Team – is set up. The aim is to complete an initial case assessment within a maximum of 72 hours and initiate urgent measures to protect the child (see Section 3.3). Staff absences within the Child Protection Team must be coordinated with the Integrity Team and the ombudsperson.

As the external offices of Diakonie Katastrophenhilfe and the regional offices of Brot für die Welt also represent the EWDE, they are to be integrated into the EWDE Complaint Mechanism. The Complaint Focal Points play an important role with respect to the external offices. They act as a link between the head office in Berlin and the external offices for the EWDE Complaint Mechanism, and enable straightforward and confidential access for employees and target groups.

There are basically **two different scenarios** concerning child protection cases:

1. Cases of suspected violence against children/a child by an employee of the EWDE or persons who have gained access (either in person or online) to children or to depictions of the sexual abuse of children through the EWDE (see Section 3.4.1);
2. Cases of suspected violence against children/a child by employees of a partner organisation (see Section 3.4.2).

The EWDE may also learn of suspected cases that take place within the environment of projects carried out by partners. In this event, the Compliance and Risk Management Staff Unit, in coordination with the Child Protection Team and the responsible regional unit, will make contact with the partner organisation. The partner organisation must then take the required steps.

### **3.2.1 Cases of suspected violence against children/a child by an employee of the EWDE<sup>18</sup>**

As a rule, offences in the areas of corruption/fraud/embezzlement, endangering the welfare of children/abuse/sexual violence and other violations of legal provisions, as well as other significant violations of internal rules and regulations (for example, concerning the EWDE Code of Conduct) will be carefully reviewed, processed, and documented by the Integrity Team.

With regard to **suspected cases of violence against children**, the Integrity Team must involve members of the Child Protection Team by forming a specific team for processing the case(s). Joint decisions can also be taken as to whether to include additional individuals, for example from regional units, in this processing team.

The processing team ensures that the child is protected before initiating any additional measures with respect to the accused. All members of the processing team are obliged to act with the utmost confidentiality and to protect the identity of the respective children, informants and accused persons in an appropriate manner.

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<sup>18</sup> In this instance, “Employee of the EWDE” refers to all persons to whom the EWDE Child Protection Policy applies (see Scope of the Child Protection Policy, Section 1.4).

Should any members of the team have a personal relationship to the suspect, they will be removed from the case team on grounds of partiality. The Integrity Team is obliged to keep written documents on the suspected case up to its conclusion.

The Child Protection Team may engage **external experts** to assist it in dealing with the case. The Integrity Team will help to identify requirements in a particular situation.

### **3.2.2 Cases of suspected violence against children/a child in a partner organisation**

The EWDE is to be informed immediately if suspicion falls on **employees of a partner organisation**. Partner organisations are obliged to investigate reports and complaints within the context of their own complaint management system in a professional and appropriate manner. Here, too, the child's welfare is paramount. The assistance that the EWDE can, if required, provide in such cases is described in Section 4.

In exceptional cases, the EWDE reserves the right to independently investigate suspected cases relating to partner organisations. Serious cases, in which the partner organisations fail to exercise due diligence and do not cooperate constructively in processing the case, may constitute a reason for immediate suspension of payments and/or termination of the relationship.

### **3.3 Protective measures for affected children**

Children affected by violence by EWDE staff or by persons contracted by the EWDE need help and support throughout the entire process. In principle, it must be ensured that they are informed adequately and in an age-appropriate manner about the institutional procedures, and involved as far as possible.

If necessary, the teams may consult trained psychologists, initiate medical care measures and involve other governmental or non-governmental institutions in order to ensure the maximum protection of the child. This applies in particular to institutional care facilities. Steps are taken to ensure that the suspected person no longer has any contact to children. The people responsible for the child (carer and/or family) are – as long as they themselves are not suspects – to be immediately informed and supported in order to provide the child with a safe environment. The Integrity Team, in close cooperation with the Child Protection Team, will take all applicable and necessary measures. The EWDE will provide the necessary financial resources, if required. Such measures may include involving a specialised psychologist to interview the child. Due to the risk of re-traumatising children, children should not be interviewed by members of the Child Protection Team, by those who reported their suspicions, or by EWDE staff members.

The minimum standards for child protection which have been set out here also apply to partner organisations which independently process suspected cases. The EWDE is creating a written guide for partner organisations, in which these standards are defined as minimum requirements.

## 4. Requirements for partner organisations, programmes and projects

In the view of the EWDE, a comprehensive Child Protection Policy, which complies with the internationally recognised “Keeping Children Safe” standards<sup>19</sup>, is the most consistent way of ensuring child protection in the context of its work. The minimum criteria for cooperation with partners are: risk assessment and risk management strategies, a code of conduct, the definition of an institutionalised procedure in the case of violations (complaint mechanism), and a commitment to inform the EWDE about acute cases as well as the steps being taken to deal with them.

### 4.1 Basis of cooperation: Joint standards, complaint mechanism, and reporting requirements

Before carrying out a project, partner organisations check whether particularly vulnerable persons (including children) are part of the target group (risk assessment). If this is the case, the partner organisations describe the risk and how they will address it in the context of the project (risk management).

Partner organisations commit to adopting a code of conduct (or equivalent policy) that prohibits endangering a child’s welfare, including in the form of sexual, physical or psychological violence, as well as via the exploitation and neglect of children. This code of conduct must be supplemented by a complaint mechanism. Children in the target group must have effective access to this mechanism. This means that target groups must be informed of their rights, that access to the complaint mechanism is straightforward and appropriate to the context and also adapted to particularly vulnerable groups. If partner organisations have not already adopted such standards and a corresponding complaint mechanism, an introduction must be planned within the next three years. Partner organisations must inform Brot für die Welt and Diakonie Katastrophenhilfe immediately if there is growing evidence of harm to a child in any project funded by Brot für die Welt and Diakonie Katastrophenhilfe.

When reviewing project partners, we will also check whether a child protection policy, or a code of conduct which incorporates child protection, as well as a complaint mechanism, already exist or are planned.

### 4.2 Supporting and advising partner organisations

If necessary, the EWDE helps partner organisations to develop and implement child protection measures: If necessary, partner organisations can ask the EWDE to cover the costs of developing a child protection policy, a code of conduct and/or a complaint mechanism as part of the project funding, and the EWDE will assist if possible. Partner organisations are informed of these possibilities as part of the partner dialogue process.

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<sup>19</sup> [https://resourcecentre.savethechildren.net/node/8562/pdf/kcs\\_standards\\_10.14.pdf](https://resourcecentre.savethechildren.net/node/8562/pdf/kcs_standards_10.14.pdf)

In addition, written guides are being developed that define minimum requirements for a code of conduct and complaint mechanism and include best practice examples for implementation.

The EWDE and its organisations promote regional networking on the topic of child protection. In many countries, the EWDE already has partner organisations that are active in the field of child protection. The EWDE strives to make use of the skills and expertise of these organisations and, if possible, to support them in their role as local contact partners for other partner organisations. The Consulting and Support Services (CSS) can also be used to develop institutional tools and expertise.

Partner organisations can also reach out to the Project Officers and other Programme Officers at the EWDE to address issues concerning their strategies, tools, and specific cases. The EWDE Child Protection Team is willing to assist the Project Officers and Programme Officers on specialist matters.

## 5. Documentation and procedures of the Child Protection Team

The Child Protection Team meets at least once every six months to discuss current cases and developments in the area of child protection, to **exchange information** and to **plan training events for employees**. The aim is to ensure continuous internal learning to improve the EWDE's child protection system.

Each individual case is documented by the Integrity Team and stored with privacy protection in a central location. The Child Protection Team can access cases relating to child protection. The Child Protection Officer must submit an **annual, anonymous status report** that has been agreed upon with the Child Protection Team to the Compliance and Risk Management Staff Unit, which in turn submits the anonymised status report to the Executive Board alongside other complaint cases as part of a pooled annual report. The report reflects experience gained from the ongoing work and contains suggestions for changes when dealing with future cases.

The EWDE Child Protection Policy is **reviewed** by the Child Protection Team at least once every five years as required. The revision will take the analysed experience of the internal child protection practice into account as well as external changes to the internationally applicable child protection standards.

## 6. Annex

### 6.1 Definition and forms of violence against children

The World Health Organisation's (WHO) definition reads as follows:

“Child abuse or maltreatment constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.”<sup>20</sup>

The term “endangerment of the child's welfare”, which shapes the child protection debate in Germany, is a vague legal term that must be interpreted according to the individual case.

Based on the WHO's definition and the need to interpret the term “endangerment of the child's welfare”, five main categories<sup>21</sup> of violence against children are defined as follows:

- The **physical abuse** of a child includes all violent acts that result from a lack of control and for grooming reasons that cause physical damage and injuries to the child, whether it is targeted damage to the physical integrity or damage as a result of uncontrolled emotional acts by parents or other adults.
- **Sexual violence** against children is any sexual act committed on or in front of a child either against the child's stated will or to which the child cannot knowingly consent due to physical, psychological, cognitive or linguistic inferiority. The perpetrator uses his or her position of power and authority to satisfy his or her own desires at the child's expense. This includes sexual acts involving physical contact (especially chest and genital area) and, for example, the presentation of pornographic material or the production of pornographic films and exhibitionism by a much older adolescent or adult.
- **Mental or psychological child abuse** refers to actions that lead to a serious impairment of a relationship of trust between caregiver and child and hinder their spiritual and psychological development into an autonomous and life-affirming personality. Mental abuse also includes intimidation, isolation, exploitation of children and refusal of emotional support.
- **Neglect** is the continuous or repeated failure of caregivers (parents/guardians or other persons authorised by them) to care for the child in a way that is necessary to ensure the physical and psychological welfare of the child. This lack can be active or passive (unconsciously), due to insufficient insight or knowledge.

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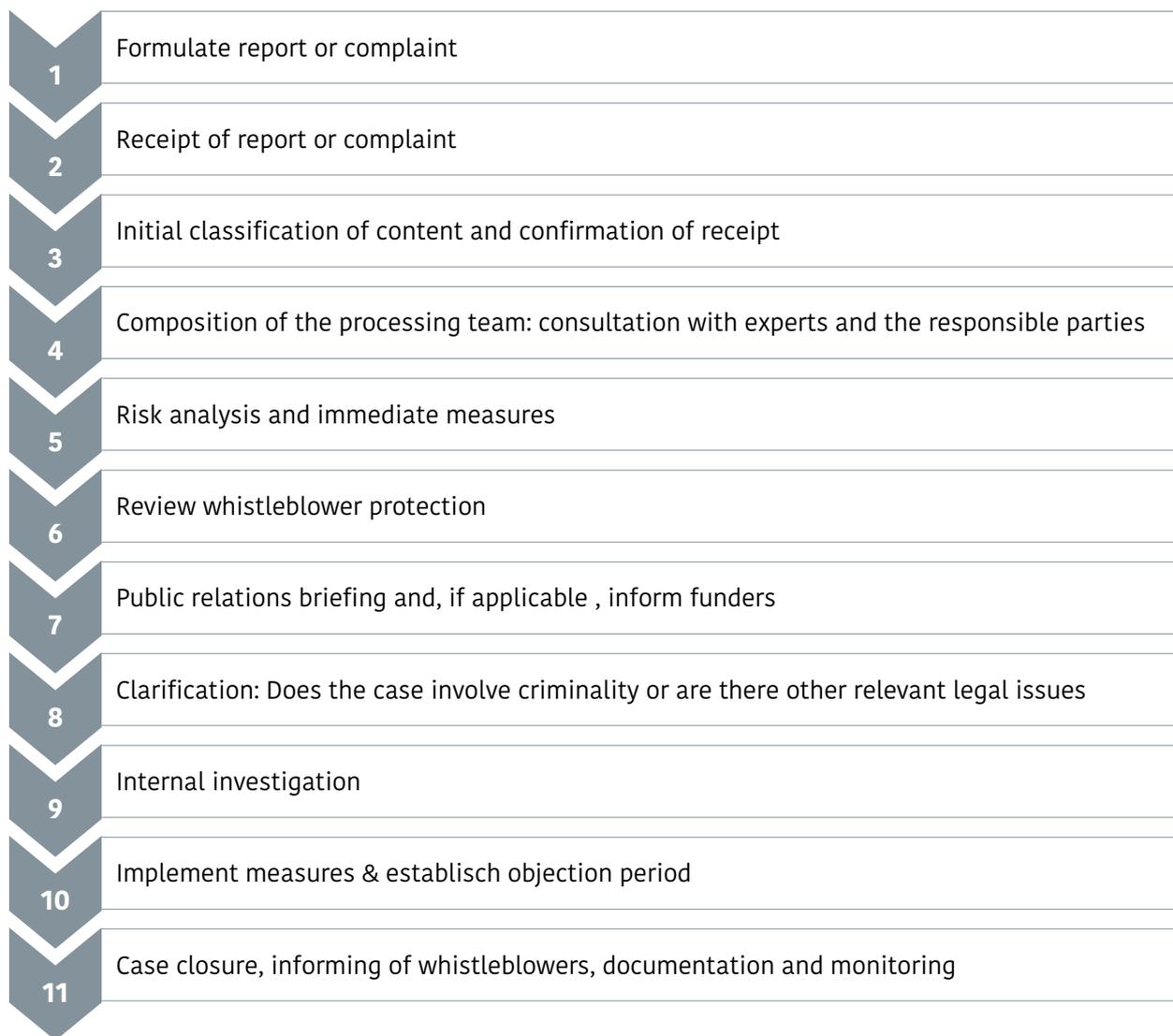
<sup>20</sup> Taken from World Health Organisation (1999): Report of the Consultation on Child Abuse Prevention, WHO, Geneva, 29–31 March 1999 (document WHO/HSC/PVI/99.1), p. 15. <https://apps.who.int/iris/handle/10665/65900>

<sup>21</sup> See Mündler, J. et al (2000). Kindeswohl zwischen Jugendhilfe und Justiz. Professionelles Handeln in Kindeswohlverfahren. Weinheim. (available only in German)

- **Exploitation** is the commercial or other exploitation of a child through activities that the child performs for the benefit of a third party. These activities include exploitative child labour and child prostitution, as well as any other activity that leads to the economic exploitation of the child, impairs the child’s physical and mental health, prevents his or her education, and disrupts the child’s moral and psychosocial development.

## 6.2 The EWDE Complaint Mechanism procedure in eleven steps

(The particular points relating to child protection are shown in Section 3.2.)



## 6.3 Interview guideline in cases of suspected violation of the EWDE Code of Conduct and EWDE Child Protection Policy

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### Interview guideline in cases of suspected violation of the EWDE Code of Conduct and EWDE Child Protection Policy

#### A Introduction

The following interview guidelines aim to provide orientation and achieve maximum specificity when gathering information, in order successfully to respond to a report.

Please conduct the interview in a formal manner and react empathetically to every reported incident. Please observe the following general guidelines for conduct:

- **Keep calm:** Avoid reactions such as shock or disgust, which might be falsely interpreted by the whistleblower or complainant.
- **Speak slowly:** Speak slowly and adjust your speed to that of the whistleblower or complainant. Be patient if answers are given slowly or hesitantly. Try not to interrupt the speaker. The whistleblower or complainant sets the pace.
- **Use simple language:** Avoid complex, abstract or suggestive questions/words. Victims in particular may feel misunderstood or as if attention is not being paid.
- **Guarantee confidentiality:** Make sure the whistleblower knows that all information is treated confidentially and in a small, strictly defined circle. Anonymity is granted to those who desire it. However, make it clear that the report can be dealt with most successfully if those in charge of the case can make contact with the whistleblower or complainant. If the whistleblower is unsure as to whether or not their suspicion is justified, reassure them that the report will be professionally assessed and processed by an expert team. Every report of suspected abuse is important, even if it later turns out to be unfounded.
- **Emphasise that all information is voluntary:** The whistleblower or complainant does not have to reveal any information that they do not wish to. Nobody can be forced to provide an answer. The whistleblower or complainant may end or leave the interview at any time.
- **Making notes:** Make as detailed notes as possible. If the whistleblower or complainant agrees, the interview may be recorded.

The questions can be asked in any order. The important thing is that all topic areas are addressed:

- 1) Details of the whistleblower or complainant
- 2) Details about the suspected case
- 3) Details about the accused
- 4) Details about the complaint process
- 5) *In the event of an offence against a child:* Details about the child

#### **Note:**

- Under B) you will find general, case-independent questions (p. 2).
- Under C) you will find additional important questions in the case of suspected violation of the EWDE Child Protection Policy or suspected cases endangering child welfare (p. 7).
- Under D) you will find additional important questions in the case of suspected sexual violation or suspected inappropriate behaviour (p. 11).

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## B General, case-independent questions

### Receipt of report or complaint

Date: .....

Received by: .....

### Form of communication?

written  oral

### Report or complaint?

report  complaint

## 1) Details of the whistleblower or complainant

### Details of the whistleblower or complainant

Anonymous? (Please tick one box)

Yes

No

Gender: .....

Position at the EWDE or relationship to the EWDE: .....

Organisation/Subsidiary: .....

Department/Unit/Regional Office/Partner Organisation/Regional Diakonie Association or its specialised agency/Diakonie Institution: .....

Supervisor: .....

*If not anonymous:*

Name: .....

Email: .....

Telephone: .....

Address, if applicable: .....

*If the alleged case took place abroad/in a partner organisation:*

Country/Location: .....

Project Number: .....

**Are you in any way involved? Did you witness the incident yourself or did a third party tell you about it?** (In Child Protection cases, see Section C. In sexual violence cases, see Section D.) (Please tick one box)

I am involved

I observed it myself

Somebody told me about it

*If not involved:*

Name of the affected person: .....

Relation of the affected person to EWDE: .....



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- Working conditions
- Discrepancies with respect to donations
- Other: .....

**Are there witnesses or evidence?** (Please tick one box)

- Yes
- No
- Unknown

*If so, which?* .....

*Contact details, if applicable:* .....

**If there are witness, are they willing to provide information?** (Please tick one box)

- Yes
- No
- Unknown

### 3) Details about the accused

**Details about the accused**

Name: .....

Gender: .....

Date of Birth/Age: .....

Position at the EWDE or relationship to the EWDE: .....

Department/Unit/Regional Office/Partner Organisation/Regional Diakonie Association or its specialised agency/Diakonie Institution: .....

Supervisor: .....

*If abovementioned is unknown:*

**Other characteristics/Description to help identify the accused:**

.....  
 .....

**What is your relation to the accused?**

.....  
 .....

**Who committed the violation?** (Please tick one box)

- EWDE Executive Board
- EWDE Head of department/unit
- EWDE employee
- Local employee at a Regional Office of
- Management of a partner organisation
- Employee of a partner organisation
- Expert
- Volunteer

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- |   |  |
|---|--|
| <input type="checkbox"/> Brot für die Welt or Diakonie Katastrophenhilfe            | <input type="checkbox"/> Beneficiary   |
| <input type="checkbox"/> Management of a regional/professional Diakonie association | <input type="checkbox"/> Consultant  |
| <input type="checkbox"/> Employee of a regional/professional Diakonie association   | <input type="checkbox"/> Grant holder  |
| <input type="checkbox"/> Management of a Diakonie institution                       | <input type="checkbox"/> Other contract partner (supplier, service provider)                     |
| <input type="checkbox"/> Employee of a Diakonie institution                         | <input type="checkbox"/> Employee at Evangelische Zentralstelle für Entwicklungshilfe e.V. (EZE) |
| <input type="checkbox"/> Other: .....   |  |

**Have you or a third party already spoken to the accused about the case?** (Please tick one box)

- Yes
- No
- Unknown

*If so, what was the result?*

.....

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.....

.....

**Important:** Please make it clear to the whistleblower or complainant that no (additional) conversations with the accused should take place.

#### 4) Details about the complaint process

**Has the supervisor (if not implicated themselves) been informed?** (Please tick one box)

- Yes
- No
- Unknown

*If so, when, and what did they do?*

.....

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.....

.....

.....

**Have other departments and units become involved?** (e.g. Compliance and Risk Management Staff Unit, Integrity Team, Complaint Focal Point, Corruption Prevention Team, Child Protection Team, Data Protection Officer, Employee Representative Committee, General Equal Treatment Act (AGG) Complaints Office, Gender Equality Officer, Representative for Severely Disabled Persons, Human Resources Department, Finance Department, Legal Services Department, regional or country office, local police, media ...) (Please tick one box)

- Yes

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- No
- Unknown

*If so, which, and what did they do?*

.....

.....

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.....

.....

**Have other steps been initiated? If so, what?** (Please state the date and time at which contact was made, the name of the conversation partner and the content of the conversation.)

.....

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**Other:**

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## C Case-specific questions: Suspected violation of the EWDE Child Protection Policy, suspected cases affecting children or suspected cases endangering child welfare

### Forms of violence against children:

(in accordance with the UN Convention refers to all human beings under 18 years of age)

- **Physical violence:** Hitting, kicking, burning, pushing, etc.
- **Emotional violence:** Shouting, humiliating, intimidating, threatening, isolating, bullying, stalking, etc.
- **Sexual violence:** sexual abuse, rape, sexual exploitation in the form of prostitution, child pornography, etc.
- **Neglect:** Refusing to meet the child's basic needs (incl. medical needs), inadequate supervision, etc.
- **Exploitation:** exploitative child labour, exploitation in the form of prostitution, child trafficking, etc.

### Important with respect to sexual violence against children:

- "Sexual abuse is always involved when an adult approaches a child with the intention of obtaining sexual arousal or satisfaction."
- = Sexual activity
  - which is performed on or in front of or in the presence of a child and/or
  - which occurs against the wishes of the child.
- Whistleblowers may have the impression that sexual activity might have taken place with the consent of the child. The following applies: The possibility of consent is linked to age and is legally regulated by the laws of individual countries (see: <https://www.ageofconsent.net/world>). Sexual relations with people below this age of consent are illegal, even if consent is given. It is not possible to consent to sexual violence.
- Citizens or persons whose primary residence is in the Federal Republic of Germany can be prosecuted under German law if they sexually abuse children or youths abroad. The same rule applies in 32 additional countries.

### 1) Details of the whistleblower of complainant

**Are you in any way involved? Did you witness the incident yourself or did a third party tell you about it?** (Please tick one box)

- I am involved
- I observed it myself
- Somebody told me about it

*If not involved:*

Name of the child: .....

Sex of the child: .....

Relation of the child to EWDE: .....

Contacts of the child: .....

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**What is your relationship to the child/youth?**

.....  
 .....

**2) Details about the suspected case**

**What did you observe with respect to the child?** (Do they, for example, have any injuries? What is the child's appearance like? Do they suffer from fear or anxiety?)

.....  
 .....  
 .....  
 .....

**Have you spoken to the child?** (Please tick one box)

- Yes
- No

**Can you send a transcript of the conversation?** (Please tick one box)

- Yes
- No

**How did the child react?**

.....  
 .....  
 .....  
 .....

**Important:** Please make it clear to the whistleblower that they should not independently interview any children involved in the case

**3) Details about the accused**

**Have you spoken to the suspect?** (Please tick one box)

- Yes
- No

**How did they react to the accusation?**

.....  
 .....  
 .....  
 .....

**Important:** Please make it clear to the whistleblower that no (additional) conversations with the accused should take place

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**What is the relationship of the accused to the child?**

.....  
 .....

**4) Details about the complaint process**

**5) Details about the child (in the case of multiple children, please record details individually)**

**Details about the child:**

Name: .....

Gender: .....

Nationality: .....

Date of Birth/Age: .....

Relationship to the project: .....

Relationship of the child to the accused: .....

Child's address (or details about whom the child lives with):

.....

Current location of the child: .....

**Were steps taken to ensure the present safety of the child, and if so, what? (Please tick one box)**

Yes

No

Unknown

.....  
 .....  
 .....  
 .....

**Were steps taken to ensure that the abuse cannot continue, and if so, what? (Please tick one box)**

Yes

No

Unknown

.....  
 .....  
 .....

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**Can you say what further measures are necessary to protect the child?** (Please tick one box)

- Yes
- No
- Unknown

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**Does the child have a disability/physical impairment?** (Please tick one box)

- Yes
- No
- Unknown

**Is the child cognitively impaired?** (Please tick one box)

- Yes
- No
- Unknown

**Has the child been abused repeatedly?** (Please tick one box)

- Yes
- No
- Unknown

**Is the child traumatised?** (Please tick one box)

- Yes
- No
- Unknown

**Particular cultural factors that need to be considered:**

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**Other:**

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## D Case-specific questions: Suspected sexual violation, or sexually inappropriate behaviour

### 1) Details of the whistleblower or complainant

**Are you in any way involved? Did you witness the incident yourself or did a third party tell you about it?** (Please tick one box)

- I am involved
- I observed it myself
- Somebody told me about it

*If not involved:*

Name of the affected person: .....

Sex of the affected person: .....

Relation of the affected person to EWDE: .....

Contacts of the affected person: .....

**Do you have injuries?** (Please tick one box)

- Yes
- No

.....

.....

.....

.....

.....

**Do you wish measures to be taken for your protection?** (Please tick one box)

- Yes
- No

.....

.....

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.....

### 2) Details about the suspected case

**What did you observe with respect to the affected person?** (Do they, for example, have any injuries? What is the affected person's appearance like? Do they suffer from fear or anxiety?)

.....

.....

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.....

**Have you spoken to the affected person?** (Please tick one box)

- Yes

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No

**Can you send a transcript of the conversation?** (Please tick one box)

Yes

No

**How did the affected person react?**

.....

.....

.....

.....

.....

**Important:** Please make it clear to the whistleblower that they should not independently interview any affected person involved in the case.

**Were steps taken to ensure the present safety of the affected person, and if so what?** (Please tick one box)

Yes

No

Unknown

.....

.....

.....

.....

.....

**Were steps taken to ensure that the abuse cannot continue and if so what?** (Please tick one box)

Yes

No

Unknown

.....

.....

.....

.....

.....

**Can you say what further measures are necessary to protect the affected person?** (Please tick one box)

Yes

No

Unknown

.....

.....

.....

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.....  
 .....

### 3) Details about the accused

*If you are affected personally:*

**What is your relationship to the accused?**

.....  
 .....

*If you are not affected personally:*

**What is the relationship of the accused to the affected person?**

.....  
 .....

**Have you spoken to the suspect? (Please tick one box)**

Yes

No

**How did they react to the accusation?**

.....  
 .....  
 .....  
 .....

**Important:** Please make it clear to the whistleblower that no (additional) conversations with the accused should take place

### 4) Details about the complaint process