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# Street Child Safeguarding Policy

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# Safeguarding Policy

## 1. Introduction

*Street Child ensures children are safe, in school and learning — even, and especially, in low-resource environments and emergencies. We specialise in working with local-level organisations for lasting impact.*

As we undertake our mission, we are committed to the safety and welfare of those whom we serve. Our duty to safeguard all those who encounter Street Child is of paramount importance.

The purpose of the policy is to protect any person (primarily those children and others that we work with) from harm or the risk of harm that may be caused as a result of coming into contact with our organisation. This includes harm or the risk of harm arising from:

- The conduct of our staff or associated persons<sup>1</sup>
- The design and implementation of Street Child's systems, programmes and activities
- Our systems and procedures
- Deliberate acts
- Neglect or a failure to fully exercise our duty of care

This policy lays the organisation's safeguarding commitments and responsibilities and informs staff and associated personnel<sup>2</sup> and visitors<sup>3</sup> of their responsibilities in relation to safeguarding. This policy has been drawn up based on international standards and good practice.

The policy is based upon the founding principles of our sector to "Do No Harm", Equality, Respect, Survivor-Centred and Confidentiality. Our determination to adhere to the best interests of children and vulnerable adults as well as our zero tolerance of abuse, exploitation and harassment are a clear expression of the values of the whole organisation, which include the need to treat each other fairly with compassion and respect.

Street Child also has a duty of care towards its own staff and the agency's policy and responsibilities in relation to harassment and bullying within a work-based context are outlined in Street Child's Code of Conduct.

This policy has been approved by Street Child's Board of Trustees and will be reviewed and revised annually from the date of approval.

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<sup>1</sup> See 'Scope of application' for definition of associated personnel

<sup>2</sup> Personnel include staff, contractors, advisors, volunteers, trustees, incentive workers.

<sup>3</sup> Visitors include representatives of organizations, government, donors, journalists, celebrities etc.

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## 2. Policy Statement

Street Child is committed to establishing and maintaining safe, respectful and enabling environments for all those who come into contact with the organisation. This requires the establishment of a culture of safety, respect and dignity, where our safeguarding responsibilities and duty of care are the cornerstones of everything that we do and say across every department and across the whole organisation. The policy is 'inclusive of but not limited to' protection from sexual exploitation.

This means that we will ensure:

- the safety and well-being of everyone who comes into contact with Street Child, its people, systems and programmes of work
- that the safeguarding responsibilities of the organisation are clear and understood by everyone both within and outside the organisation
- that mandatory safeguarding responsibilities of all staff and representatives are clear and understood by everyone.

This policy provides the foundation for the way in which we are:

- raising awareness of our safeguarding commitments
- preventing harm that may occur within Street Child's projects and programs.
- identifying behaviours and attitudes that are not acceptable within the organisation
- outlining the responsibilities and methods for reporting concerns about the implementation of the policy
- responding appropriately to concerns when they arise
- responding appropriately to issues such as community-based child protection concerns and incidents, which occur outside the organisation, but which nevertheless require appropriate assessment, response and reporting/referral to relevant bodies. Separate, but linked assessment and response guidelines apply in such cases. A revised child protection policy to strengthen and guide this aspect of work has been developed.
- ensuring our partner agencies also provide safe and respectful environments for the work that they undertake on our behalf

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## 3. Scope of the Policy

This policy applies during or outside working hours, every day of the year and in all locations, equally and without exception to:

- The Board of Trustees
- All staff contracted by Street Child (under any contractual mechanism)
- Staff and representatives of implementing partner agencies
- Associated personnel whilst engaged with work or visits related to Street Child, including (but not limited to): auditors, trainers, consultants; volunteers; contractors; incentive workers; and programme visitors, including (but not limited to): donors, auditors, celebrities; journalists, staff relatives, researchers and politicians.

This policy requires that each of the groups above carry some safeguarding responsibility whilst some carry additional responsibilities in line with the requirements of their role.

**Board of Directors:** Provides strategic oversight and ensures compliance with and sufficient resourcing for this policy.

**Senior Management:** Leads the implementation and upholds the policy, allocating resources and facilitating training.

**Staff:** Adhere to the policy, report concern promptly and participate in safeguarding training.

**Volunteers:** Understand and follow the policy, report concerns without hesitation and attend safeguarding training or orientation.

**Program Participants and Beneficiaries:** Have the right to be safe, report any concerns freely, and receive appropriate support in case of an incident.

Street Child recognises that the aims of this policy will not be achieved without the establishment of a strong and positive work culture within which safeguarding plays a key role.

The implementation of this policy relies on the values of the organisation being reflected in the behaviours of our representatives, the enabling structures, procedures and our managers and leadership which champion and sustain our work environment and culture.

## 4. What Does Safeguarding Mean at Street Child?

Safeguarding means taking all available steps within our power to prevent all harm and abuse caused because of our work programmes, our systems, our partners and our people. The approach applies to everyone we deal with but particularly to the most vulnerable groups that we work with, namely children, and young people.

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This means that we need to identify and mitigate risks that could arise from:

- Inappropriate behaviour of our representatives (whether deliberate or inadvertent)
- Weaknesses in our systems (such as allowing unsuitable people to work for us)
- Unsafe programme design and implementation (where we have not properly identified and addressed all avoidable risks)
- Partner agencies who have different safeguarding standards (where our partner assessment, agreements and monitoring do not enable our safeguarding standards to be implemented by partners)

It also means that we have to be able to respond appropriately when an issue or an incident arises. We do this through having established procedures for reporting and assessing concerns and by investigating cases professionally and appropriately. Where breaches are confirmed, disciplinary measures up to dismissal can be enforced. Incidents involving a crime are routinely referred to law enforcement bodies.

Street Child's safeguarding policy and procedures are integrated into the recruitment, selection and induction programme of all new staff.

## 5. Child Protection and Safeguarding

This policy is specifically about Safeguarding which is primarily inward facing. However, safeguarding and child protection are closely aligned and often intersect with a protection issue developing into a safeguarding issue and vice versa.

Child protection is about making the world, external to our organisation, safe for children and vulnerable persons. It is considered child protection when the abuse, exploitation and/or harm are caused by persons or situations in the community outside Street Child's work programmes. We respond to child protection issues through programmatic approaches, often engaging with external agencies and partners.

## 7. Requirements of the Safeguarding Policy

### **Awareness:**

Street Child will ensure that all staff and associated personnel are trained and are aware of the high standards of behaviour and conduct required of them. Street Child staff and associated personnel must not:

- Cause any form of violence or abuse of power, emotional or verbal abuse
- Sexually exploit or abuse any person.
- Engage in sexual activity with anyone under the age of 18 (regardless of local legislation or customs). Mistaken belief in the age of a child is no defence.
- Exchange money, employment, goods or services for sex or sexual favours. This includes, but is not limited to, using the services of sex workers, (whether or not prostitution is legal in the location)

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demanding sexual activity in exchange for assistance/service that is due to beneficiaries and demanding sexual activity in exchange for employment or administrative service.

- Engage in a sexual relationship between those providing humanitarian assistance and protection and a person benefiting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
- Use a child or adult to procure sex for others.
- Use Street Child property or equipment to access pornographic or extreme content.
- Create an environment which poses a risk of sexual exploitation and abuse.
- Engage in any inappropriate use, requests or contact through social media.
- Delay in meeting a child or vulnerable person's basic physical or emotional needs.
- Delay in fulfilling the duties to report any concerns or suspicions regarding any form of harassment or abuse involving any personnel via the established reporting mechanisms.
- Condone, participate in, or ignore family violence (including FGM and other harmful traditional practices).
- Initiate or engage in unnecessary physical contact.
- Engage in or facilitate grooming in any form.
- Engage in or facilitate in any form of trafficking, forced labour etc.

Staff and associated personnel are required to:

- Contribute to creating and maintaining an environment that prevents sexual exploitation/abuse and safeguarding violations and promotes the implementation of this Safeguarding Policy.
- Report any suspicion or concern of safeguarding issues.
- Ensure all communication in any format including social media will be respectful and adhere to the aims of this policy
- Ensure that all staff and associated personnel are aware of the requirements of this policy and our safeguarding approaches.
- Ensure that everyone is aware of the process to raise a complaint if they are concerned that these standards are not being met or if an incident has occurred.
- Raise a concern/complaint to Street Child, using the means of reporting referred in the section below, about an incident they have experienced, witnessed, or heard about concerning a staff member or partner (suppliers, partners, contractor, etc.) without fear of retribution.

This policy will be published and available publicly.

## **Prediction and Prevention:**

Street Child recognises that we have a duty to create a working environment where the risk of a safeguarding incident occurring is minimised. This includes:

- Selecting our representatives with care in order to ensure their suitability for the role and we will undertake rigorous vetting and induction processes.
- Maintaining an overview of safeguarding issues and monitoring the implementation of the safeguarding policy and procedures throughout the organisation.

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- Applying a risk assessment and mitigation approach to minimise the risks of safeguarding breaches in any area including People, Systems, Programmes, or Partners.
- Designing, implementing and monitoring programmes with safeguarding risks included as part of risk mitigation. Programmes will include as a minimum a basic mapping of the safeguarding environment in which the programme will operate.<sup>4</sup>
- Ensuring that staff and associated personnel receive orientation on safeguarding at a level commensurate with their role in the organisation.
- Affirming our commitment to the Code of Conduct, and Safeguarding Policy in all the vacancy announcements.
- Ensuring that the use of IT equipment and use of social media is governed by the aims of this policy<sup>5</sup>. It is prohibited to make, share, forward or request inappropriate material or behaviour using online or IT based methods.
- Including the assessment and mitigation of risk and all forms of harm in all communications and marketing material and activities.
- Enabling internet content filtering and evaluating other online safety mechanisms periodically to ensure that this policy and any linked policies are consistently applied. Street Child believes that online safety is an essential part of safeguarding.

## Reporting:

Street Child will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and all those we come in to contact with.

Staff are required to report concerns, there is no requirement to provide evidence or facts. The policy relates to the reporting of **concerns**.

To enable this, we will appoint a designated Focal Point Person at appropriate places/departments in order to support the policy.

We will ensure that all of our staff and others who benefit from our work, or engage with our organisation, are aware on what steps to take when concerns regarding safeguarding issues arise. We will do this by:

- Providing an organisation mechanism for reporting incidents and allegations
- Providing a reporting mechanism appropriate to every work location
- Providing support and advice to managers and staff on all safeguarding matters
- Any staff reporting concerns or complaints in good faith will be protected by our Whistleblowing Policy
- Street Child will also accept complaints from external sources such as members of the public, service users/beneficiaries, suppliers & vendors and official bodies

## Safeguarding concerns

**All concerns about possible breaches of the Code of Conduct, Safeguarding Policy, Child Protection**

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<sup>4</sup> Basic safeguarding mapping should include an understanding of relevant local laws in terms of SEA issues and how they are enforced along with an assessment of safeguarding risks and resources available for those affected by SEA.

<sup>5</sup> Please see related policies

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**Policy must be reported by Street Child staff to one of the following means of reporting as soon as they become aware of the concern. Where communications and reporting options are difficult, this must be done within 24 hours at the latest.**

- The Designated Safeguarding Focal Person at each location, mentioned in appendix 1 of this policy, or your line manager
- Whistleblowing hotline e.g. Safe Call<sup>6</sup>
- Country or Programme manager/director or equivalent – as long as that person is not part of the concern
- Street Child's Global Safeguarding Focal Point or Global Safeguarding Specialist, email: [safeguarding@street-child.org](mailto:safeguarding@street-child.org)
- Anonymously fill the Whistleblowing Complaint Form on Street Child's official website: <https://street-child.org/whistleblowing-policy/>

## Responding:

Street Child will ensure that immediate action is taken to address reports of breaches of safeguarding policy and ensure the safety and well-being of the person(s) involved.

Responses will be in accordance with our established procedures, international and professional best practice, survivor focussed standards, donor and legal requirements.

Referrals will be made to the relevant authorities where sexual exploitation or abuse; abuse of a child; or abuse of an at-risk adult is reported or suspected.

Sexual exploitation and abuse by Street Child employees and associates are considered extremely serious violations of the organization's core values, ethical standards, and safeguarding policies. Such conduct undermines the trust placed in the organization by the communities it serves, damages the dignity and rights of affected individuals, and compromises the safety and integrity of Street Child's programmes. Consequently, any substantiated incident of sexual exploitation or abuse will be classified as gross misconduct. This designation reflects the gravity of the offense and warrants immediate and decisive disciplinary action, up to and including the termination of employment, contract, or agreement. Street Child maintains a zero-tolerance policy toward such behavior and is committed to taking all necessary steps to prevent, address, and respond to any instance of sexual misconduct within its operations.

It is our policy to report all crimes to the relevant law enforcement authorities unless doing so may pose a risk to anyone involved in the case.

Within its means, Street Child will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). This could include consultation with a qualified counsellor, medical assessment or assistance or personal protection such as relocation. Decisions regarding medical and welfare support will be led by the survivor.

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<sup>6</sup> SafeCall is one of many paid independent whistleblowing/"speak out" services available globally and multilingually. There are others also available.



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## **Investigating:**

Allegations of breach of policy and Code of Conduct will be investigated applying the CHS<sup>7</sup> Alliance SEAH<sup>8</sup> investigation guidance as administrative workplace investigations and any potential breach of local laws will be referred to the appropriate authorities for investigation.

## **Learning and Strengthening:**

We are committed to reviewing and learning from the monitoring of the implementation of the policy, through regular review of the policy and from learnings identified as a result of any concern that has been raised.

## **6. Glossary of terms**

### **At Risk Adult**

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

### **Beneficiary of Assistance**

Someone who directly receives goods or services from [NGO]'s programme

### **Child**

A person below the age of 18, as per the United Nations Convention on the Rights of the Child

### **Digital/On-line Abuse**

Digital/Online abuse is any type of abuse that happens on the internet. It can happen across any device that's connected to the web, such as computers, tablets and mobile phones. And it can happen anywhere online, including:

- social media
- text messages and messaging apps
- emails
- online chats
- online gaming
- live-streaming sites.

It includes a range of behaviours including cyberbullying and harassment, grooming and sexting as well as sexual, emotional abuse, extortion and exploitation. It also includes the making, sharing or requesting

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<sup>7</sup> Core Humanitarian Standards

<sup>8</sup> Sexual Exploitation and Abuse

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of inappropriate or offensive material or behaviour.

**Family Violence** includes Female Genital Mutilation (FGM), child or/and forced marriage, honour killing and other rituals.

**Financial Harm/Child Financial Exploitation** is when a child is groomed into helping criminals launder money or commit fraud. This can happen to a child also being exploited in other ways

## Grooming

Grooming refers to the deliberate process of building a relationship with a child or vulnerable person to manipulate, exploit, or abuse them, often by gaining their trust or the trust of their caregivers. Grooming can take several forms, depending on the context and the methods used by perpetrators. It can include sexual, emotional, physical grooming, ideological, digital or online or financial grooming.

## Harassment

Harassment covers a wide range of behaviours of an offensive nature. It is understood as behaviour that demeans, humiliates, and intimidates a person. These are behaviours that appear to be disturbing, upsetting, or threatening. When harassing behaviours become repetitive, it is defined as bullying. The continuity or repetitiveness distress caused may distinguish it from insult.

## Harm

Psychological, physical, emotional, sexual infringement of an individual's rights. Harm by neglect includes the withholding of available resource or assistance. Self-harm is when you hurt yourself as a way of dealing with very difficult feelings, painful memories or overwhelming situations and experiences. Potential self-harm may also include suicide attempt, or radicalisation.

## Neglect

Persistent failure to meet a child's basic physical and/or psychological needs, for example by failing to provide adequate food, clothing and/or shelter; failing to prevent harm; failing to ensure adequate supervision; or failing to ensure access to appropriate medical care or treatment.

## Psychological or Emotional Harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

## 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 Abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

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## **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.

## **Sexual Harassment**

Sexual harassment is a type of harassment based on the sex or gender of a victim. It can involve offensive, sexist or sexual behaviour, verbal or physical actions. Harassment may be explicit or implicit.

## **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.

## **Trafficking**

Trafficking refers to the recruitment, transportation, transfer, harbouring, or receipt of people through force, fraud, deception, or coercion for the purpose of exploitation.

## **7. Other related policies**

Street Child Child Protection Policy  
Street Child HR Manual  
Street Child Code of Conduct  
Street Child Whistleblowing Policy  
Street Child Social Media Policy  
Street Child Equality, Diversity and Inclusion Policy  
Street Child IT and Data Protection Policy

## **8. Condensed version of the policy**

- Our safeguarding policy and the standards of behaviour linked to the policy apply to every representative of Street Child at all times and in all locations.
- Street Child is committed to preventing any harm or abuse caused as a result of its work or its people. Where harm is caused, either directly, intentionally or unintentionally as a result of a failure or neglect, we will respond appropriately.
- Street Child is committed to maintaining safe, respectful and enabling environments for all those within the organisation and all those who come into contact with, or who benefit from, our support.
- This requires the establishment of a culture of openness and dignity, where our safeguarding responsibilities and duty of care are the cornerstones of everything that we do and say.
- Street Child firmly believes that no person should experience harm, abuse, harassment or bullying and we have a particular duty of care to prevent any such harm arising from our activities or representatives.

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- We have developed policies, codes of conduct and procedures that:
  - raise awareness about what standards of behaviour people can expect from a L4WB<sup>9</sup> approach
  - maintain systems for reporting or sharing any concern or complaint
  - support procedures for responding, handling and learning as a result of any concern raised
  - adhere to our responsibilities in relation to issues involving law enforcement, local authorities and statutory services

If you think that we are not meeting the standards outlined above or that there is a possibility of harm, we ask you to raise a concern with us through any of the channels available. You are not required to provide evidence of your concern.

Concerns should be raised with any of the safeguarding focal persons referenced in appendix 1 below.

## 10. Appendices

### Appendix 1. Safeguarding Contact List

#### CEO

Tom Dannatt

E. [tom@street-child.org](mailto:tom@street-child.org) T: +44 (0) 7782 173447

#### Global Safeguarding Committee

Designated Safeguarding Trustee – Anthony Wallersteiner (Co-Chair of Board of Trustees)

E: [awallersteiner@stowe.co.uk](mailto:awallersteiner@stowe.co.uk) T: +44 (0)1280 818240/+44(0)7795 325066

Global Safeguarding Focal Point – Julie Polzerova, Executive Director AET Programmes

E: [julie.polzerova@street-child.org](mailto:julie.polzerova@street-child.org) T: +447535349787

Global Head of Advisory – Ramya Madhavan

E. [ramya.madhavan@street-child.org](mailto:ramya.madhavan@street-child.org) T. +44 (0)7937 147302 (WhatsApp)

#### Global Safeguarding Contacts

*Anyone may contact any of these individuals regarding a safeguarding incident*

Designated Safeguarding Trustee – Anthony Wallersteiner (Co-Chair of Board of Trustees)

E: [awallersteiner@stowe.co.uk](mailto:awallersteiner@stowe.co.uk) T: +44 (0) 1280 818240

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<sup>9</sup> L4WB-Learning for Wellbeing Framework

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Designated Safeguarding Trustee – Lynn Davies  
E: [L.DAVIES@bham.ac.uk](mailto:L.DAVIES@bham.ac.uk) T: +44 (0)7798 650487

Global Safeguarding Focal Point – Julie Polzerova  
E: [julie.polzerova@street-child.org](mailto:julie.polzerova@street-child.org) T: +44(0) 7535349787

Global Safeguarding Specialist – Sadia Hussain  
E: [sadia.hussain@street-child.org](mailto:sadia.hussain@street-child.org) T: +92 3007043982

## Country Safeguarding Focal Points

Afghanistan Safeguarding Focal Point – Tajammul Hussain  
E: [tajammul.hussain@street-child.org](mailto:tajammul.hussain@street-child.org) T: +93 728529412

Bangladesh Safeguarding Focal Point – Kristina Hiya Baroi  
E: [kristina.baroi@street-child.org](mailto:kristina.baroi@street-child.org) T: +1624628794

Burundi Safeguarding Focal Point – Denis Ndayizeye  
[denis.ndayizeye@street-child.org](mailto:denis.ndayizeye@street-child.org) T: WhatsApp: +257 79 320 312/+ 257 61 320 312

Cameroon Safeguarding Focal Point – Kingsley Udo  
E: [Kingsley.udo@street-child.org](mailto:Kingsley.udo@street-child.org) T: +237 651235268

DRC Safeguarding Focal Point-Ravaka Ranivoarianja  
E: [ravaka.ranivoarianja@street-child.org](mailto:ravaka.ranivoarianja@street-child.org) T: +243820628101.

Kenya Safeguarding Focal Point Rosebella Odhiambo  
E: [admin@africaeducationaltrust.org](mailto:admin@africaeducationaltrust.org) T: +254 723903191

Sierra Leone and Liberia Safeguarding Focal Point – Emily Tunnacliffe  
E: [emily.tunnacliffe@street-child.org](mailto:emily.tunnacliffe@street-child.org) T: +44 7768 882891

Mozambique Safeguarding Focal Point - Benigna Matabele  
E: [benigna.matabele@street-child.org](mailto:benigna.matabele@street-child.org) T: +258 877399002

Nepal Safeguarding Focal Point – Nilam Subedi  
E: [nilam.subedi@street-child.org](mailto:nilam.subedi@street-child.org) T: +9779846049472

Nigeria Safeguarding Focal Point – Elam Firrichi  
E: [firrichi.elam@street-child.org](mailto:firrichi.elam@street-child.org) T: +234 9033828835

Moldova - vacant

Pakistan Safeguarding Focal Point – Sadia Hussain

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E: [sadia.hussain@street-child.org](mailto:sadia.hussain@street-child.org) T: +923 007043982

Somalia and Somali Land Safeguarding Focal Point – Mohamed Iidle

E: [m.iidle@street-child.org](mailto:m.iidle@street-child.org) T: +252 61 2500005

South Sudan Safeguarding Focal Point – Name: Esther Oliga

E: [e.oliga@africaeducationaltrust.org](mailto:e.oliga@africaeducationaltrust.org) T: +211922221420

Uganda Safeguarding Focal Point – Susan Nyangoma

E: [susan.nyangoma@street-child.org](mailto:susan.nyangoma@street-child.org) T: +256 773 375593

UK Safeguarding Focal Point – Susana Munisi

E: [susana.munisi@street-child.org](mailto:susana.munisi@street-child.org) T: +44 (0) 7976 298001

EU Safeguarding Focal Point – Clothilde Bruneton

E: [clothilde.bruneton@street-child.org](mailto:clothilde.bruneton@street-child.org) T: +33 6 42 89 38 84

Ukraine Safeguarding Focal Point – Oleksandr GOLINEVYCH

E: [Oleksandr.golinevych@street-child.org](mailto:Oleksandr.golinevych@street-child.org) T: +380 99 689-5231