

Recommendation to the different associations of SOS-Children's Villages, by the Advised Further Inquiries Team (AFIT)

derived from the AFIT's report concerning the Organisation's Responsibility
Relating to the Compulsory Indeterminate Placement of Children (CIP) in Syria

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(Final Version)

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Mandated by:

SOS-Kinderdörfer weltweit e.V., the Chair of the Board and the Supervisory Board of SOS-Kinderdörfer weltweit e.V.

The following provisional recommendations are based on our work to date and reflect current insights into governance, safeguarding, and the CIP practice within SOS Children's Villages Syria (SOS CV Syria) but impacting on considerations for SOS Children's Villages International (CVI), SOS-Kinderdörfer weltweit e.V., and the broader federation. These recommendations are intended to be subject to refinement as new information emerges, circumstances evolve, and additional needs are identified through ongoing investigation.

In order to understand and contextualise the following recommendations, it is important to know how the different SOS Children's Villages organisations are connected:

- SOS Children's Villages International (CVI), based in Vienna, is the umbrella organisation for all SOS Children's Villages around the globe.
- SOS CV Syria is the national association responsible for programmes in Syria.
- SOS-Kinderdörfer weltweit e.V., based in Munich, is a sponsoring association that co-financed the programmes in SOS CV Syria and commissioned the investigations of the Advised Further Investigation Team (AFIT). The present recommendations have been formulated within the framework of these investigations and are based on the findings of the investigators.

Both, SOS CV Syria and SOS-Kinderdörfer weltweit e.V. are independent members of the international federation of SOS CVI.

1. Prioritising safeguarding and programmatic integrity

Recommendation: SOS CVI in coordination with the member association in which the safeguarding failure arises must prioritise safeguarding concerns affecting children and youth, as well as programmatic integrity and transparent communication. Decisions should be guided by what best serves the safety, rights, and wellbeing of children, youth, and staff members affected. Child protection must always take precedence, and the onboarding of managing directors, and executive level staff members, must include a comprehensive handover of all known risks relevant to the mission of the organisation.

Rationale: The CIP children-related crisis shows that the safeguarding of children and potential violations of child and human rights were not given the necessary priority. This has had direct implications for the programmatic integrity of SOS Syria’s work, underscoring the need for a shift in organisational priorities toward transparent risk reporting and unwavering commitment to child protection.

Implementation:

SOS CVI should work to ensure global safeguarding policies are robust and enforceable. It should also develop risk handover protocols requiring that all managing directors receive comprehensive risk briefings during onboarding, thus ensuring continuity. Transparent communication should be supported to guide crisis response strategies that centre on child rights and programmatic impact.	SOS CV Syria should maintain clear documentation and timely reporting of safeguarding concerns and operational risks and develop guidelines to ensure that decisions—especially during crises—are guided by the best interests of children and youth. A transparent assessment and escalation of matters posing risks to children and youth, must be implemented.	SOS-Kinderdörfer weltweit e.V. can advocate for global priorities and advocate for field realities in global decision-making, ensuring safeguarding remains central. It can monitor programmatic impact by evaluating how safeguarding decisions affect humanitarian outcomes and adjust support accordingly.
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2. Develop and establish a survivor-centered tracing and engagement strategy

[High Priority]

Recommendation: Develop a short-term and long-term tracing strategy that prioritizes survivor dignity, confidentiality, cultural sensitivity, and support for families.

Rationale: The vast majority of CIP families remain untraced or unwilling to engage due to stigma, fear, or trauma. A survivor-centered approach would build trust, facilitate voluntary disclosure, possibly support reconciliation and reintegration. Ensure sustained, confidential, and culturally sensitive tracing of CIP children and their families. Most CIP children exited SOS CV Syria without proper documentation or confirmed reunification. A specialized resourced and re-mandated AFIT will centralize efforts and build trust with affected families. Engaging external partners currently conducting investigation or tracing efforts, is of great importance. It is also important to avoid duplication of process and ensure that tracing and verification process are not repeated by different teams but should be conducted in a coordinated manner.

Implementation:		
<u>SOS-Kinderdörfer weltweit e.V.</u> mandated AFIT is developing a tracing strategy further to this recommendation and its further mandate. AFIT will undertake to collaborate with SOS CV Syria and other internal-SOS and external stakeholders to develop and employ its tracing strategy. This will also be informed by objectives to avoid duplication of efforts and unnecessary approaches to CIPs and their families.	<u>SOS CV Syria</u> initiative for local tracing and engagement focuses should coordinate with the AFIT team to avoid duplication of efforts and unnecessary approaches to CIPs and their families. It could also promote collaboration with Syrian NGOs, child protection agencies, and community leaders to coordinate tracing efforts, share resources, and build trust while avoiding duplication	<u>SOS CVI</u> should support SOS CV Syria in its coordination of tracing efforts with AFIT and should likewise coordinate any additional efforts mandated by CVI to avoid duplication of efforts and unnecessary approaches to CIPs and their families

3. Engage with Syrian Authorities to secure access to government records [High Priority]

Recommendation: Obtain critical placement and exit documentation and related information from MOSAL (Syrian Ministry of Social Affairs), Air Force Intelligence (Syrian Secret Service Department), and other entities.		
Rationale: Engagement with the transitional government is now feasible and essential for verification and tracing work.		
Implementation:		
<u>SOS CV Syria</u> should initiate formal requests to MOSAL, Air Force Intelligence, and other relevant entities to obtain placement and exit documentation, leveraging transitional government openness. It should also ensure that documentation obtained is integrated into existing tracing efforts.	<u>SOS CVI</u> should support SOS CV Syria to facilitate secure and compliant data acquisition. It should collaborate with legal experts to ensure the data is verified and ethically used for child protection and reunification efforts.	<u>SOS-Kinderdörfer weltweit e.V.</u> should endorse the documentation initiative and require regular reporting on progress and challenges. It should engage external stakeholders to support access efforts and ensure that the process aligns with broader justice and accountability goals.

4. Strengthening Risk Reporting Protocols for Child and Youth Protection

Recommendation: SOS-Kinderdörfer weltweit e.V. should implement a formalized risk reporting protocol that ensures transparent communication of child and youth protection risks to escalate to the Supervisory Board and all Executive Board members and ensure timely dissemination of such risks to responsible managers when reported to the International Board.

Rationale: Child protection risks must be eliminated in order to ensure the wellbeing of the children in care. Therefore, they demand heightened accountability. They also can carry significant legal, ethical, and further consequences. Transparent reporting ensures that leadership is fully informed and can act swiftly. By ensuring that both the Supervisory and Executive Boards are aware of child and youth protection risks, SOS-Kinderdörfer weltweit e.V. reinforces a culture of responsibility and enables coordinated and timely decision-making at the highest level. Risks reported to the International Board must not remain isolated. Sharing them with responsible managers ensures operational teams are equipped to respond and mitigate issues effectively.

Implementation: SOS-Kinderdörfer weltweit e.V. should develop a framework and guidelines that require clear documentation and escalation of risks. This protocol will help SOS-Kinderdörfer weltweit e.V. meet those obligations as a robust reporting system and demonstrate its commitment to safeguarding to stakeholders and donors. SOS-Kinderdörfer weltweit e.V. can develop and adopt a written policy that defines how child protection risks are identified, documented, and escalated. This should include clear thresholds for what constitutes a reportable risk, timelines for escalation, and designated recipients (e.g., Supervisory Board, Executive Board, International Board). Risk reporting could also be integrated into Board Meetings by mandating a standing agenda item in all board meetings – both Supervisory and Executive – for reviewing child protection risks that could impact integrity and donor relations. Designated individuals could present updates, mitigation strategies, and any new incidents or concerns. Such an approach will help keep leadership informed and engaged, enabling timely strategic responses.

5. Ensure effectiveness of centralized and secure archival system for child records

Recommendation: SOS CV Syria created a database of all program participant information from 2012 to present. SOS CV Syria, in coordination with SOS CVI, should develop and implement a system to audit the comprehensiveness of the records and database, including historical placements, referrals, and exit documentation.

Rationale: The investigation revealed pervasive gaps in record-keeping, particularly prior to 2018 and SOS CV Syria would benefit from a separate exercise auditing and endorsing or correcting the comprehensiveness of the records and database, as well as being able to rely on that endorsement should future questions arise regarding past practices.

Implementation:

SOS CV Syria should work to reconstruct missing data where possible. It can use staff interviews, community outreach, and archived documents to fill gaps—especially for pre-2018 records. It should prioritize survivor dignity and confidentiality when reconstructing sensitive information.

SOS CVI should provide SOS CV Syria with a clear methodology for auditing database completeness and accuracy and include criteria for verifying historical placements, referral pathways, and exit documentation.

6. Formalize a CIP Classification and Documentation Protocol

Recommendation: Unified adoption of the “Compulsory Indeterminate Placement” (CIP) classification and criteria developed by AFIT and integrate it into federation-wide and external communications and safeguarding and reporting protocols.	
Rationale: Replacing the stigmatizing “Security Case” label or “children who were forcibly separated and placed in our care without proper documentation” (which does not accurately reflect the placement, if anything it should state “placed contrary to gatekeeping and admission process”) with CIP reflects a more accurate and respectful understanding of the children’s circumstances. Formal adoption would standardize identification, tracing efforts, and support mechanisms across the federation. A federation-wide single term would assist reporting and classification of CIP cases.	
Implementation:	
SOS CV Syria can formally adopt the CIP classification in its internal case management system and ensure all staff are trained to use it consistently in documentation and reporting. This will improve clarity and reduce stigma in communications with families, authorities, and partners.	SOS CVI can integrate the CIP terminology into federation-wide communication and materials, ensuring unified language across NMAs and enhancing current and future cross-border tracing and support efforts.

7. Commission a legal review of CIP practices

Recommendation: Assess compliance with international law and determine organisational liability.		
Rationale: The CIP practice may have violated several Articles of the Convention of the Rights of the Child (CRC).		
Implementation:		
SOS CVI should launch an independent review of CIP practices to evaluate compliance with international law, focusing on key CRC articles. A federation-wide legal risk framework should be developed to ensure mandatory reviews for high-risk child protection interventions.	SOS CV Syria should compile complete and secure documentation of CIP placements and child welfare decisions for legal review.	SOS-Kinderdörfer weltweit e.V. should conduct a legal audit of SOS CV Syria’s CIP practices to assess organizational and individual liability or ensure AFIT is mandated to address this issue.

8. Commission a governance and forensic financial audit of SOS CV Syria [High Priority]

Recommendation: A broad and forensic audit of SOS CV Syria's functions and governance structures, and finance should be commissioned. This should encompass board conduct, leadership affiliations, financial conduct, use of funds, procurement practices and procedures, and decision-making processes during the CIP placement period. This will require a forensic investigation/audit conducted with a specialised methodology. Additionally, it must be ensured that the quality review of all resulting audit reports adheres to a four-eye principle, requiring independent dual review to safeguard objectivity and integrity.

Rationale: The report highlights governance failures, reputational risks, and possible undue influence linked to regime affiliations. There is evidence of financial misconduct and asset safeguarding failures. The Independent Special Commission's reporting further reveals a historical organisational correlation between weak governance and poor accountability structures – particularly in financial management – which has contributed to a culture that enables child safeguarding failures. An independent governance audit and forensic financial investigation would clarify accountability, inform necessary reforms, and strengthen institutional integrity. While SOS CV Syria has undergone several audits, reviews, and investigations, there remains a critical gap: the absence of a forensic audit. This specialised approach is essential to uncover deeper systemic issues. The application of a four-eye principle in reviewing audit reports will reinforce transparency and ensure that findings are rigorously validated before informing strategic decisions

Implementation:

<u>SOS-Kinderdörfer weltweit e.V.</u> should commission a further AFIT (or other organisation) mandate to include a broad audit function of SOS CV Syria's governance structures and finance as recommended here. SOS-Kinderdörfer weltweit e.V. can additionally set up a monitoring framework to track SOS CV Syria's and SOS CVI's progress on audit recommendations. Require regular reporting to SOS-Kinderdörfer weltweit e.V.'s Executive and Supervisory Boards. Contract external forensic auditors and governance specialists to ensure impartiality. Consider publishing a summary of findings to reinforce, transparency, public trust and institutional integrity.	<u>SOS CV Syria</u> should grant full access to financial records, governance documents, and personnel for audit purposes. An internal liaison team – comprising finance, governance, and safeguarding representatives – will coordinate with auditors and address findings. The organization must commit to implementing audit recommendations, outline a reform timeline, and regularly update SOS CVI and SOS-Kinderdörfer weltweit e.V. on progress.	<u>SOS CVI</u> should ensure that audits include forensic specialists and child safeguarding experts. SOS CVI should also enforce the Four-Eye Principle in audit review by requiring all audit reports to be reviewed independently by at least two qualified reviewers before acceptance. This ensures objectivity and reduces the risk of oversight or bias.
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9. Establish a public accountability and transparency initiative

Recommendation: SOS CV Syria, with support from SOS CVI and SOS-Kinderdörfer weltweit e.V., should launch a public-facing initiative to acknowledge past failures, share progress on reforms, and engage with affected communities and stakeholders.		
Rationale: Reputational damage and public mistrust remain significant. A transparency initiative would demonstrate accountability, possibly foster dialogue, and rebuild confidence in the organisation's commitment to child protection and justice. This could also encourage cooperation with the long-term tracing efforts.		
Implementation:		
SOS CV Syria should lead the public engagement effort by publishing a formal accountability statement acknowledging past safeguarding failures and outlining reforms and future commitments. It should host community dialogues with affected families and partners to foster trust and gather feedback and launch a transparent communications platform with multilingual content to share audit findings and progress updates.	SOS CVI should provide strategic oversight by coordinating a consistent and sensitive media strategy for SOS CV Syria, engaging external experts if needed. It should commission independent evaluations of reform progress and publish summaries to reinforce transparency, while facilitating federation-wide engagement to promote shared learning and dialogue on governance reforms.	SOS-Kinderdörfer weltweit e.V. should champion accountability by publicly endorsing the transparency initiative and ensuring it aligns with safeguarding standards through regular monitoring. It should engage donors and external stakeholders to rebuild trust and support long-term tracing and justice efforts, advocating survivor-centered approaches across the federation.

10. Criteria and Standards for Conditional Engagement with Authoritarian Regimes

Recommendation: There must be a critical assessment of the continuation and/or creation of programs and operations in nations under authoritarian regimes. Such affiliations should only proceed under strict quality review protocols and continuous monitoring, and with verified cultural expertise either internally or through external consultants. Additionally, there has to be mechanism to assess and ensure the MAs ability to operate without the interference of the regimes and their proxies. If these minimum standards cannot be met, engagement should not be pursued.		
Rationale: Accountability and reputational risks are heightened in contexts where programs operate in nations under authoritarian regimes where undue influence may be exerted over humanitarian operations. Without rigorous safeguards, organizations risk complicity in harmful practices. Misunderstanding local dynamics can lead to poor decision-making, reputational damage, and failures in child protection. Tight quality reviews and monitoring mechanisms ensure that partnerships align with humanitarian principles and safeguarding commitments. They also help detect and mitigate risks early.		
Implementation:		
SOS CVI should enforce policy oversight by developing	SOS CV Syria should conduct political risk assessments as it	SOS-Kinderdörfer weltweit e.V. should mandate

a federation-wide engagement framework for work in authoritarian contexts, including mandatory reviews and cultural expertise requirements. It should implement a pre-engagement review panel to assess risks and require documented mitigation plans, while regularly auditing operations in sensitive regions using impartial validation methods.	must establish minimum operational standards for governance and child protection, including disengagement protocols if these are compromised, and build cultural competence by engaging local advisors and training staff in political and cultural sensitivities.	governance safeguards for high-risk contexts, requiring SOS entities to meet minimum standards before initiating operations, with clear benchmarks for child and youth protection and financial transparency. It should support independent evaluations of SOS CV Syria's practices and use findings to guide future policy, while championing ethical engagement standards to ensure humanitarian principles are upheld across the federation.
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