

# Child Protection Policy

## WP2.D2.1.



*“ON-OFF project”*

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## I. INTRODUCTION TO THE CHILD PROTECTION POLICY OF THE ON-OFF PROJECT CONSORTIUM

Child protection means protecting children from harm, both intentional and unintentional. The fundamental objective of child protection is to ensure that all those with a duty to safeguard children recognize that duty, and are able to fulfil it. All staff involved in working with children and young people has to ensure that the interests and safety of children and young people are protected. Article 3 of UNCRC<sup>1</sup>, provides that, when organizations make decisions which affect children, the best interests of the child must be their primary consideration.

The child protection policy of ON-OFF applies to all the staff of the ON-OFF Consortium dealing directly with children within the project and is aimed at:

- Ensuring safe recruitment in checking the suitability of staff to work with children.
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
- Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- Supporting children who have been abused in accordance with child protection regulation and protocols in each national context.
- Establishing a safe environment in which children can learn and develop.

The staff of the ON-OFF project consortium are not supposed to implement the project activities directly with young people (teachers and educators will be those involved in the testing phase). However, the consortium considered it important to share this Child Protection Policy because they can be asked to participate in support and, more in general, because it is important to raise awareness on these issues.

ON-OFF PROJECT CONSORTIUM's vision is to partner and support in building and growing as individuals in order to achieve inner peace and harmony with others.

ON-OFF PROJECT CONSORTIUM's mission is to contribute to improving the mental health of children and adults by helping them to accept themselves as they are, to find alternatives to their behavior, to communicate effectively by asserting themselves and not hurting others, to deal with conflicts in the family and at work, manage crises in different situations and differentiate and manage their emotions.

ON-OFF PROJECT CONSORTIUM works to provide a safe environment for children who participate in the project activities.

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<sup>1</sup> A summary of the rights under the Convention on the Rights of the Child, [https://www.unicef.org/crc/files/Rights\\_overview.pdf](https://www.unicef.org/crc/files/Rights_overview.pdf)

ON-OFF PROJECT CONSORTIUM considers all forms of abuse / violence and exploitation of children to be unacceptable. The likelihood of employees, donors or partners committing acts of abuse / violence against children is taken seriously by consortium, which is committed to working to prevent them.

Child protection is both a team and a personal responsibility. All employees will be made aware of the need to integrate child protection in all the project activities. Relations with anyone found to be involved in child abuse and child exploitation relationships will be terminated.

On-Off project consortium declares that it confirms the need to protect children and especially those with whom it works. This is in line with the rights of the child set out in the UN Convention on the Rights of the Child.

Children and young people need support and security for many reasons. They may need protection from the effects of poverty, harm, isolation and violence. But in addition to these economic, social and political problems affecting large numbers of children, individual children may also be at risk of specific forms of abuse by adults and other children.

This policy is designed to ensure the safety and protection of the rights of children and families from people who would seek to gain their trust through abuse by using On-Off project consortium to ensure access to young children through the project's activities.

This document sets out the minimum common standards for child protection. The On-Off project consortium introduces procedures that comply with the minimum standards. Violation of the standards will entitle the consortium to take further action.

The main goal of the Child Protection Policy is to protect children from abuse and to adopt a consistent and unifying approach that increases our ability to achieve this. The standards and policy are proof of the commitment made by ON-OFF PROJECT CONSORTIUM for the best work for child protection.

## II. PRINCIPLES OF THE CHILD PROTECTION POLICY

This policy for internal protection of the child is based on the UN Convention on the Rights of the Child, the UN Declaration on the Elimination of Sexual Abuse and Exploitation of Children and all others related to children, the National Legislation of the partners to the project, the standards for Keeping Children Safe and other international good practices.

We at On-Off project consortium are guided by the following principles:

- All children have the same right to protection from abuse.
- Everyone has a responsibility to support the protection of children.
- Partners have a duty to care for children with whom they are in contact, with whom they work or who are affected in any way by their work.
- If the project organizations work with partners, they have a responsibility to help their partners meet the minimum protection requirements.
- All actions regarding child protection are taken in the paradigm of understanding that the child is at the center and her/his best interest is most important.



### III. DEFINITIONS AND TERMS

#### CHILDREN'S RIGHTS

In accordance with the UN Convention on the Rights of the Child, we work to ensure that all children, especially those who are most marginalized and vulnerable, are able to exercise their rights through our work. And especially in accordance with Article 19 (of the Convention on the Rights of the Child), the policy of the On-Off project consortium states that all children have the right to protection.

"... From all forms of physical or mental violence, injury or abuse, neglect or negligence, ill-treatment or exploitation, including sexual offenses, while in the care of the parent (s), guardian (s) or any other person, to whom the child is entrusted. "

#### WHAT IS ABUSE AND NEGLIGENCE?

Defining child abuse is a difficult and complex issue. A person can abuse a child, causing harm or failing to prevent harm. Children can be abused in a family, institution or community, by those whom the children know and trust, and less frequently by strangers.

For the purposes of the On-Off project consortium's Child Protection Policy, several definitions of violence will be considered, complementing each other and providing a comprehensive picture of how to recognize child abuse.

Different sources were used to define violence, which is why they are grouped into 3 subgroups:

##### First subgroup

- Definition / 1 / of Violence and Neglect of Children, used by the US Federal Violence Prevention and Treatment Act, which provides the minimum standards that the United States must integrate into its definitions of child abuse and neglect:

"Any act or omission by a parent or carer of a child that results in death, serious physical or emotional harm, sexual abuse, or exploitation; or any act or omission that results in imminent risk or serious harm (child's)".

- Definition / 2 / from a document of the International Center for Human Rights for Reform of Criminal Law and Criminal Justice Policy

Violence is defined as: "... intentional behavior against children that is likely to cause physical or psychological harm."

- Definition / 3 / from the site of Pulse BG:

"There is no universal definition of child physical abuse, neglect or psychological abuse. According to one definition, a child is abused whose parents or guardians cause or allow him or her to be seriously harmed, or create or allow a significant risk of serious harm to be created, or take or allow the child to be sexually abused. "

For the purposes of practical work, four main forms of abuse are identified:

- physical abuse - any non-accidental injury to a child by a parent or guardian;
- sexual abuse - the use of a child or adolescent by another person for sexual gratification;
- neglect - chronic inability of the parent or guardian to provide for the child's basic needs;
- psychological abuse - including neglect, inability of the parent or guardian to provide the necessary support, attention and affection of the child or psychological abuse - chronic patterns of behavior such as humiliation, insults, ridicule of the child.

Key terms for evaluation in these definitions are:

- intent of the action
- severity of the injury
- lack of action in a risk situation
- damage as a result of anger on the part of the adult.

### The second subgroup

In England and Wales there are 4 categories of abuse in the most general sense:

- **Physical injury**: May include hitting, shaking, throwing, poisoning, burning, drowning, suffocation, or any other physical injury to a child, including tampering with symptoms or intentional deterioration of the child's health.
- **Negligence**: is a constant failure to meet the child's basic physical / psychological needs, which can lead to serious impairment in the child's health or development, such as lack of adequate food, shelter and clothing, or carelessness and irresponsibility to basic emotional child's needs.
- **Careless attitude towards emotions**: bad attitude towards the child's emotions or emotional torture of a child, which harms her/his development. It also includes showing children that they are worthless, that they are unlovedly incapable, that they exist only because of another person's need; or when they are assigned inappropriate expectations. In addition, this includes children who are often intimidated, exploited or corrupted.
- **Sexual abuse**: involves forcing or enticing a child to engage in sexual activity, whether or not the child is aware of what is happening. These actions may include physical contact, including penetrating or non-penetrating actions. They may also involve children interfering in the viewing or production of pornographic material, or encouraging them to engage in inappropriate behavior.

### Third subgroup

In the sense of the Bulgarian legislation "ADDITIONAL PROVISION to the RULES FOR IMPLEMENTATION OF CHILD PROTECTION ACT"

§ 1. For the purposes of the regulations:

1. "Violence" against a child means any act of physical, mental or sexual abuse, neglect, commercial or other exploitation leading to actual or probable harm to the health, life, development or dignity of the child, which may take place in the family, school and social environment.
2. "Physical violence" is the infliction of bodily harm, including the infliction of pain or suffering without a health disorder.
3. "Mental violence" with all actions that may have a preliminary impact on the mental health and development of the child, such as underestimation, constructive attitude, pain, discrimination, transfer or other forms of negative attitude, as well as the inability of parents, guardians and the guardian or caregiver to provide an appropriate supportive environment.
4. "Sexual violence" is the use of a child for sexual gratification.
5. "Neglect" means the failure of the parent, guardian and custodian or the person caring for the child to ensure the child's development in one of the following areas: health, education, emotional development, nutrition, home and safety, when is able to do it.

Many of the beneficiaries of the On-Off project consortium are marginalized and some vulnerable children are particularly vulnerable to abuse, such as children with disabilities, children from minority ethnic groups, street children, refugees and children seeking shelter, and those living in families who have problems with alcohol, mental or domestic violence.

### **Who is abusing?**

Most children are loved by their parents, by those who care for them and their communities. In this regard, most people working with children are aware that they are in a special position depending on the influence and power they exercise. At the On-Off project consortium, we realize that we need to be extremely vigilant, because people who want to abuse and hurt children exist in the society.

The On-Off project consortium is committed to protecting children from anyone who wants to abuse a child. Children are also vulnerable to abuse by other children.

### **What is organizational internal protection of the child?**

Intra-organizational child protection is the responsibility that organizations have to ensure that their employees, activities and programs do not harm children, expose them to the risk of abuse and that all organizations' concerns regarding children's safety in the communities where they work are reported to the relevant services.

"Do no harm" refers to the organization's responsibility to "do no harm" or reduce harm.

#### IV. SCOPE

This policy clarifies the position of the On-Off project consortium on child protection. Refers to all employees working in the On-Off project consortium, consultants, volunteers and partners of the project.

This policy will be disseminated to the team, partners, consultants, volunteers and clients of the On-Off project consortium. All the ON-OFF consortium's employees or similar who will work directly with children within the project will sign a declaration that they are familiar with this Policy. (Declaration, Annex № 1)

By employees we mean:

- All staff - local and international
- All volunteers and interns

By partners we mean:

- All contract workers, external consultants
- All partners, including those in the communities where we work
- Guests and visitors

It is not the task of the On-Off project consortium to decide whether there has been child abuse. It is the duty of the On-Off project consortium to alert the responsible authorities.

This policy will be reviewed every two years and / or when necessary.

## V. PREVENTION

The protection of the child from abuse and the protection of children's rights will be guaranteed through the following steps:

### **Risk assessment / risk mitigation**

The On-Off project consortium is committed to risk assessment in all stages of the project. They comply with the Child Protection Policy. The care for the children is taken seriously, as all factors that would be a risk for the children are assessed and minimized in advance.

The transportation of children or other organized activities are in accordance with the requirements of the relevant national legislation.

### **Staff recruitment**

The On-Off project consortium has a recruitment policy to the Child Protection Policy.

### **Selection and appointment of employees**

The On-Off project consortium strives to ensure the highest standards in recruiting. Each new staff member will be checked to see if he or she meets the requirements of the position for working with children and families and their level of understanding of child protection law. The safety of the applicant is also checked, for example a criminal record is attached, which is an important part of the recruitment policy.

Employees, consultants and volunteers will be recruited under clear conditions and job descriptions, which include statements of position and responsibilities related to the respective role, in order to meet the requirements of the project organizations in terms of organizational policy for internal protection.

Security checks, such as previous convictions or police checks (if disclosures are available), form an important part of the recruitment policy. If police checks are not possible, then other checks must be put into practice and noted. Must include proof of identity, authenticity of qualifications, declarations of previous convictions and the submission of at least two recommendations.

All future staff, volunteers and board members will be informed in a timely manner of the organizations' child protection policy as part of the job application procedure, and will be required to sign a declaration that they have not been convicted of criminal offenses.

Reliable recommendations-characteristics will be required for all applicants, and special attention will be paid to all areas of concern in relation to child protection. During the interview procedure, candidates will have to answer questions about their previous work with children.

## VI. BEHAVIORAL LABEL / CODE OF CONDUCT

### Practical instructions and behavior

The policies, standards and procedures at the On-Off project consortium aim to help build a safe environment for children and staff and organize work. By determining which behaviors are acceptable and which are not, good practice can be promoted and opportunities for abuse minimized.

All employees must be polite and respectful to any member of society, client or other staff. Clear, open and honest communication should be perceived as a model of behavior within the team, the various offices, between partners and all clients.

Procedures for implementing child protection policy in practice include reporting, documenting serious violations and incidents, disciplinary procedures, complaints, rules for working with children, non-discrimination and equal opportunities; all procedures are related to the child protection policy and the available documentation.

The On-Off project consortium adopts the basic principles of the UN Squad for the Prevention of Sexual Exploitation and Abuse in the 2002 Humanitarian Crisis:

- Sexual exploitation and abuse by workers of children and families or their abusive behavior become grounds for dismissal.
- Performing sexual acts with children is prohibited, regardless of age. The misconception about the age of the child cannot be an excuse.
- The exchange of money, work, goods or services for sex, including sexual services or other forms of humiliation, degradation or exploitative behavior are prohibited.
- Sexual relations between project workers and beneficiaries are highly discouraged, as they are based on inherent unequal power dynamics.
- When a project worker suspects sexual abuse or exploitation in a colleague, whether or not he or she works for the same organization, he or she should report it, in accordance with the systems and procedures in place.

All the employees and customers should be aware of this policy and their right to protection against possible abuse. The information should be in easy and accessible language and, where necessary, further explained with the services of an interpreter. It must be understandable to children. Posters and brochures suitable for children, coloring pictures and other similar materials can be used to clarify these messages. All parties should be informed that they can share their ideas for child protection.

All beneficiaries of the On-Off project consortium, including children, should be aware of this policy and their rights to protection from abuse.

All parties should be informed that they can communicate their doubts about child protection.

The policy will be monitored and evaluated to verify security and whether it has been properly implemented.

The child protection policy should be reviewed 2 years after implementation and / or at a time appropriate for evaluation. Clients, children and their families, staff, volunteers and partners should be consulted as part of the evaluation process. The changed child protection policy should then be promoted to the whole team, volunteers, clients, partners and all stakeholders.

There is a clear procedure for accepting and processing complaints. All complaints received are recorded and stored in a safe place.

Confidentiality will be respected in all circumstances, except when it is necessary to preserve the best interests of the child.

The policy will be monitored and evaluated to verify that all security measures are in place and that the policy has been properly implemented.

Procedures need to be put in place and feedback received from all major parties including children, families and communities as part of the evaluation.

Child abuse is a difficult and emotional issue for both the victimized child and the staff working with him or her. The Responsible of the Child Protection Policy will support the staff who will deal with the abuse, as well as those employees who have witnessed such an incident. This support will be offered appropriately to the designated staff member and will continue to be provided for as long as it is needed.

Regular supervision will be provided to staff.

The On-Off project consortium Code of Conduct refers to the Code of Ethics for Working with Children of the State Agency for Child Protection / Code of Ethics for Working with Children, appendix. № 2/.

Behavioral etiquette is a set of rules for appropriate and proper behavior that are designed to ensure the protection of children, but are also designed to protect adults from false accusations of inappropriate behavior or abuse / violence. This label applies to employees, volunteers, members of management bodies, contractors, sponsors, as well as to all visitors / guests to projects implemented by the organization.

- Employees of the organization and visitors / guests must not caress, hold, kiss, hug or touch minors in a way that is culturally inappropriate or unacceptable. To avoid misunderstandings, it is recommended that permission be sought from the child before holding the hand.
- Where possible and practicable, the “presence of two adults” rule should be observed, in which two or more adults observe all activities involving minors or children and are present at the site at all times. If this is not possible, the agency's staff has the right to seek alternatives, such as the presence of community members during visits to children.

- Employees of the organization should take into account the fact that they may have to work with children who, due to the circumstances and abuse they have experienced, may use the relationship to receive “special attention”. The adult is always considered responsible, even when the child has seductive behavior. Adults should avoid being compromised or vulnerable.
- Inappropriate behavior towards children is a ground for disciplinary punishment.
- Employees of the organizations must take into account the way they are perceived and look, in terms of language used, actions and relationships with children.



## VII. TRAINING

Employees will be trained to understand why we need to protect children. The teams will be trained in the basic concepts of child protection and will be familiar with the policies and procedures of the project organizations. This will help them develop the necessary skills.

Training should always be required when there are difficulties.

This will also help them develop the necessary skills to identify abuse and follow the procedure for reporting such incidents in accordance with the requirements set out in the document.

All staff, volunteers, board members and individuals employed as independent contractors working directly with children in the ON-OFF project will be informed on the child protection policy and will have to respect it.

Volunteers in the organization will be monitored by the team leaders to whom they are assigned to ensure that they do not abuse confidential information concerning children.

In the event of concerns, the Responsible of the Child Protection Policy should be informed, who in turn will undertake further investigation.

Child protection training and procedures help staff identify the risks to which some children are exposed due to their ethnic and / or racial affiliation, age, sex, religion, culture, disability.

The Codes of Ethics make it clear that everyone has a responsibility for mutual respect, tolerance and non-discrimination.

All employees, volunteers, consultants and other associates of On-Off project consortium undergo training for child protection upon admission.

The persons responsible for the selection of employees are consulted and given guidance on the methods of safe selection.

Children receive advice and support on how to protect themselves.

There are opportunities to include case studies in the child protection training program.

## VIII. COMMUNICATION POLICY

On-Off project consortium has developed a Communication Policy, which is an integral part of this policy.

Written and visual materials used by the On-Off project consortium should be checked to see if they are non-degrading and appropriate for children.

Children's photos and films, as well as web pages, should show respect for children, be in their best interests and in accordance with the On-Off project consortium's policy regarding the use of visual aids. Declaration on the use of images, /Appendix №3 /, will be signed if a similar consent is not already available by those implementing the activities.

Principles:

1. We will respect the dignity of the subject.

☒ When capturing video and photographic images, we will always ask for permission. Informed consent from parents and / or guardians, as well as directly from children when they are old, allowing them to understand the meaning of the question.

☒ Special attention is paid to materials depicting children with disabilities, refugees or those in situations of conflict and disaster, in order to properly present the context and preserve their dignity.

☒ Whenever possible, we will explain to the subjects where and how the materials will be used.

☒ We will never take pictures of people who do not want to be photographed.

2. We will not exploit the subject

We will not manipulate the subject and distort the real situation (for example, we will not ask them to cry in front of the camera).

If it is necessary to protect the confidentiality of information, the names of children or families will be changed. We will never publish the full names or contacts of a child or adult.

3. We aim to show a balanced vision of reality in developing countries.

We will avoid stereotypes (for example, how a charity worker in the Western world helps a defenseless victim). We aim to show how people work and help themselves, not to portray them as victims.

4. We will use the images truthfully.

Cases and descriptions of situations will not be fabricated, but can be adapted or edited to preserve the dignity and confidentiality of the subject.

We will not use an image of something to describe something else (for example, we will not use photos taken on one project to illustrate work on another).

Where possible, we will use a balance of images (positive and negative) to reflect the truth of the situation.

If we use an image on a general basis (for example, to illustrate a project that is similar to the one we are describing), we will add this in clarifying text.

We will not use images that may intentionally misinterpret the real situation.

If an image represents an emergency, we will not use that image in a way that suggests that the situation is rather normal.

Our goal is to be as informed and confident as possible that the subject will approve the image as true and relevant to the real situation.

5. We will maintain standards that ensure good taste and decency, consistent with our values and the values of those who support us.

We will not use erotic, pornographic or obscene images.

Images of dead or naked bodies will only be used in exceptional circumstances.

We will not use images showing extreme suffering.

6. We will respect the views of our local and international partners in the collection and use of visual materials.

We will be sensitive to the concerns and advice of our local and international partners in the collection and use of visual materials.

7. We will have a positive attitude towards the people we help in emergency situations.

In any publication relevant to a disaster, we will follow the policy described in the International Red Cross Commission's Behavioral Label: "In our information materials, publications and promotional activities, we will recognize disaster victims as human beings with dignity, not hopeless objects". In this way, we will create an objective picture of disasters, emphasizing the potential and aspirations of the victims, not their vulnerabilities and fears.

We will not lose respect for the victims, but we will treat them as equal partners.

We will work with the media to raise public awareness, but we will not allow external or internal requests for publicity to take precedence.

8. We will maintain high technical standards.

Our goal is to use only high quality images.

We could use digital processing for a better creative vision, but not in a way that intentionally or misleadingly distorts the veracity of the situation depicted.

We will not crop the image in a way that misleadingly distorts the veracity of the situation.

When editing video materials, we will not distort the truthfulness of the situation in a misleading way.

9. We will maintain an appropriate archive of images and videos.

The images will reflect the current situation and meet the requirements to be appropriate.

All images will be properly stored and documented.

Old images will be archived.

The collection of communication materials is discussed with children and the community at the beginning of the project.

It is necessary to agree to collect communication materials at the beginning of the program or project and agree with the children and community representatives about the type of images and general messages that would be appropriate for the occasion.

Personal information and images for publication must be obtained in a secure manner that complies with the principles of confidentiality.

Children need to be prepared for specific interviews before being interviewed.

Images of children must always respect the principles of decency and respect.

All children must be properly dressed according to their country of origin. In countries where children wear scanty clothing, be especially careful with the images you choose to post.

Recorded images should focus on group rather than individual activities.

Make sure that photographers and people who shoot videos are not allowed to reach children without supervision.

Permission to film must be sought before filming. Children for whom there is no such permission do not participate in group or individual photos.

All complaints and concerns about inappropriate or disturbing images should be reported, recorded and archived, as is done with any other child safety concerns.

In case of publication of information, only the first names of the children are used without revealing the place of residence, school, hobbies of the children, etc.

Children's permission is required to use their images.

The parents / guardians sign the Declaration after we have made sure that they understand how and where the images will be used.

Where there is a high risk and it is necessary to cover the faces, pseudonyms and unclear geographical locations are used.

The images are good to represent different children - of different ages, different genders, different abilities and ethnic groups.

Images of children should not be tagged with children's locations on websites.

Individuals or organizations wishing to use resources as personal information about children involved in photo and video materials must explicitly declare in writing that they will use the materials appropriately. Failure to comply with these conditions may result in the termination of the permission to use materials.

Images, materials and personal information relating to children must be kept by a person authorized by the Responsible in a safe place. Access to this room is only with the permission of the person responsible for child protection.

### **Social media**

1. This policy applies to both the staff of the On-Off project consortium, partners, volunteers, parents and children.
2. It is necessary for everyone to comply with the Communication Policy of the On-Off project consortium, as well as to be aware of the consequences of non-compliance. It is relevant and refers to a document with disciplinary procedures.
3. The people responsible for the implementation and monitoring of the Communication Policy, as well as for its revision and updating are the Responsible of the Child Protection Policy and the person appointed by her/him, who is committed to the full implementation and observance of the Child Protection Policy. They can be asked questions about politics. However, everyone has roles and responsibilities associated with this document.
4. The people authorized to post and share materials on social networks using the name of the organization are the Responsible of the Child Protection Policy and the person designated by her/him.
5. Guidelines for working with the social network in the use of images of children, the use of personal information, promotion of the organization and rules for the use of social networks:

Official use of social networks: On-Off project consortium works with the social network - "Facebook". Each employee is required to notify the manager of their intention to use the social network for business purposes. It needs to get verbal approval.

Personal use of social networks: Personal use of social networks is allowed, in which there are links to the work, as long as it does not contradict and does not violate the internal child protection policy of the On-Off project consortium.

6. Rules for personal use of social networks for staff and volunteers:

- Always write in the first person.
- Never upload or upload degrading, obscene, offensive or harmful material.

- Inform the relevant person in the organization in a timely manner if you see that someone from the team uploads such content on social networks.
- Do not share sensitive information - names and locations of children, for example.
- Always follow the rules of the site / network.
- You are personally responsible for the content you share, so always think about what you upload and share.
- Avoid uploading personal information.
- The activity of the organization in social networks will be monitored and if an employee violates the rules, she/he will be subject to disciplinary proceedings, as noted in the policy.
- Failure to follow these rules can have serious complications and violate the law, especially in cases of child abuse, humiliating images and bullying.

#### 7. Children and young people who use the services of the organization:

This section specifies the possibilities for the use of social networks by children and young people who have access to technology within the organization.

The use of social networks by children under the age of 14 violates the rules.

Children and young people should be difficult to identify on social media. No location is shared, no meetings with strangers and suspicious contacts are arranged.

The communication policy is reviewed and updated according to the needs of a period not later than 2 years.

## IX. REPORTING AND CONCERNS

The responsibility for implementing this policy lies with the Responsible of the Child Protection Policy of the On-Off project consortium. All serious doubts will be addressed to her/him.

Any information relating to abuse must be documented according to a form for reporting concerns or reporting incidents. / Concern Reporting Report, Appendix № 4. /, so that all cases are registered.

This information will be kept confidential and confidentiality will be respected. Confidentiality will only be violated if it is in the best interests of the child.

In case of established child abuse, the Child Protection Units / Police must be notified.

The On-Off project consortium seeks to create a safe organization for children, but also to keep child protection concerns balanced and to prevent too zealous attitudes from growing and spreading.

The best interests of the children are paramount and every medical need should be treated as a priority.

### **Internal investigation procedure:**

Charges against a team member should normally result in his or her immediate suspension as he or she is under investigation. If the charge is related to a criminal offense, it should be reported to the authorities before action is taken or the alleged perpetrator is informed.

Internal investigations should be led by a person or persons who have the necessary knowledge and skills to do so. The investigation should include interviews with all parties, including witnesses, to gather all the details related to the charge.

If the accusation turns out to be true, appropriate disciplinary measures should be taken. If the accusation proves to be unfounded, the right and appropriate steps must be taken to reduce the harmful effects of the false accusation on the reputation and psyche of the accused.

Internal investigations related to allegations of criminal conduct should be discussed with the authorities before taking organizational measures to ensure that the organization does not compromise the formal external investigation.

It is not always in the best interests of the child to conduct a formal investigation. As an organization that brings knowledge and experience in this direction, an internal investigation of the On-Off project consortium can only support the child and the formal investigation.

- The internal investigation will monitor whether all procedures under the Protection Policy have been followed: the selection of the person who is accused, her/his training, introduction, supervision, acquaintance with the policy, signed Declaration, etc.
- Internal investigation will also help to develop a culture of awareness in the organization.

- Experts external to the organization may be involved in the internal investigation, e.g. therapist or child psychiatrist.

Every signal and report must be taken seriously and the principle of confidentiality of information must be observed. The priority must always be the safety and best interests of the child.

There are written documents showing the procedures and mechanisms for implementing the Child Protection Policy. / Mechanism, Diagram, Appendix №5 /.

There are mechanisms for consulting children and parents / carers on child protection policy and its implementation.

Support and advice should be provided to those who report and respond to alerts.

All employees are required to report any concerns they have regarding the safety of children.

There are monitoring mechanisms for compliance with child protection policy.

There is a complaint handling procedure.

Information that can identify certain children will only be shared with those who need to know it in the organization. Any employee who reports bad practice with serious consequences will be protected as far as possible from behavior and attitudes that undermine his or her authority, as the organization accepts that it has signaled its fears of pure motives. Intentional false accusations are a serious violation of the rules of internal order and lead to internal investigation as well as disciplinary sanctions.

The subject of the alert (and the alleged perpetrator) and all witnesses must cooperate fully with the internal investigation and the hearings during that investigation. Respect for the confidentiality of the information shared by them will be a fundamental principle, and this information will only be shared with those who need to know it.

The correct and timely response ensures that the situation is under control and all those working on it are aware of the matter and the actions that need to be taken.

There is a list of other organizations and professionals that can be contacted quickly to support reporting and respond quickly and adequately to concerns. / List of other organizations and professionals, Appendix № 6 /.

## X. MONITORING AND REVIEW

Regular monitoring of risks, their reduction and the effectiveness of internal child protection measures will be integrated into organizational processes and monitoring activities.

The internal protection of the child is integrated in the organizational risk register and reports. The manager shall regularly review the risk register and reports to ensure the availability and effectiveness of internal protection measures.

This policy will be reviewed at least every two years or when the need arises for additional circumstances to be reflected in the document.



## **XI. Implementing activities with Young People**

Through a participatory approach, ON-OFF's activities will engage minors, therefore the project staff needs to recognise the sensitivity and good practice procedures of working with this age group. Ethical considerations regarding children and young people will occur at all stages. When implementing activities involving children and young people (e.g. peer-to-peer approaches to education, raising awareness, development of social media campaign, theatre of the oppressed, etc.), some additional factors need to be taken into consideration.

### Data

Collected data must be focused on the theme of the project and relevant to the purposes of the project and must not identify individuals or information.

### Access

Any involvement of children and young people must be communicated beforehand with parents/legal guardians and families. Standard consent forms are offered for their signature of approval (Annex 1), if a similar consent is not already available by those implementing the activities. If parents/legal guardians give their approval for their children to participate in the activities, the next step is for the project staff to establish whether the children themselves have already been consulted for the same matter, confirming that children's informed consent have the same value.

According to projects' activities, each partner organization will establish an expert consulting group that will contribute to the preventing cyber GBV through the development of ON-OFF Model. This group must ensure ethical revision of materials and activities for young people; co-planning with schools to ensure that activities comply with the standards and ethics of the school. School staff will be encouraged to act as supporters and to pay attention on audience reaction as a tool for identifying issues that could lead to 'activity dropouts'.

### Privacy

To ensure that all partners will respect the principle of privacy: upon disseminating results and reporting on activities implemented, the names of the persons involved will not be disclosed, anonymity will be safeguarded. Any pictures and/or videos produced as part of ON-OFF project in which recognisable features of participants are identifiable will only be made public after written permission of the parents/children/teachers (Annex 1), if a similar consent is not already available by those implementing the activities.

### Issues of Consent

Informed consent is crucial regardless of the socio-demographic characteristics of participants. Consent should be seen as an ongoing process and as something that could be

subjected to verbal negotiation at each stage of the project. This enables participants to withdraw from the project at any time should they wish to do so.

Children and young people are often less familiar with what some of the activities entail they may initially wish to participate but later feel less keen as they get to know the details of the activities. Consideration needs to be given, therefore, to ways in which children and young people can be made to feel comfortable with ending their involvement in the project activities' should they choose to do so.

By signing informed consent documents<sup>2</sup>, participants agree to a controlled breach of their privacy for a *specific purpose and a specific period of time*. According to HORIZON 2020 Guide undertaking a project involving work with persons unable to give informed consent, like children, specific information has to be provided to them such as details on the procedures to obtain approval from parent/legal guardian and also details on the measures for ensuring that there is no coercion on participants for participating. Parents and participants need to have a fully informed understanding of the project before they give their consent (Annex 3 and 4), if a similar consent is not already available by those implementing the activities. Therefore, when children lack legal competence to consent for themselves, informed consent from the legally authorized representative (parent or legal guardian) must be obtained (Annex 1), if a similar consent is not already available by those implementing the activities.

*"Informed Consent Form"* and *"Information Sheets"* (Anex 3 and 4) must be provided.

It is recommended for the activities involving children to be carried out with the support of teachers and youth workers, as some of the participants might not be at ease with discussing or dealing with topics such as sexual or gender education. Project staff must address the specific target group in a respectful and positive way.

The 'Informed Consents Form' must explicitly state that participation is voluntary and that anyone has the right to refuse to participate and to withdraw their participation, and that data will be protected throughout the project. **Consent must be given in written form.** Dissent should be respected at all times. The information sheet should include in simple terms an explanation of the background and purpose of the ON-OFF project and also how issues of privacy will be protected.

Sample information sheets, sample consent forms given to the participants and their guardians must be kept by partners and copies must be provided to the Responsible for the Child Protection Policy for reporting purposes.

Besides consent to participate in the project activities, consent must also be requested when photographs/videos are to be taken, when using and publishing children's artwork, creations, etc. Decisions about the age for informed consent and the process for obtaining it will

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<sup>2</sup> The age of consent is variable according to national contexts. Partner organisations must comply to national regulation on children's participation.

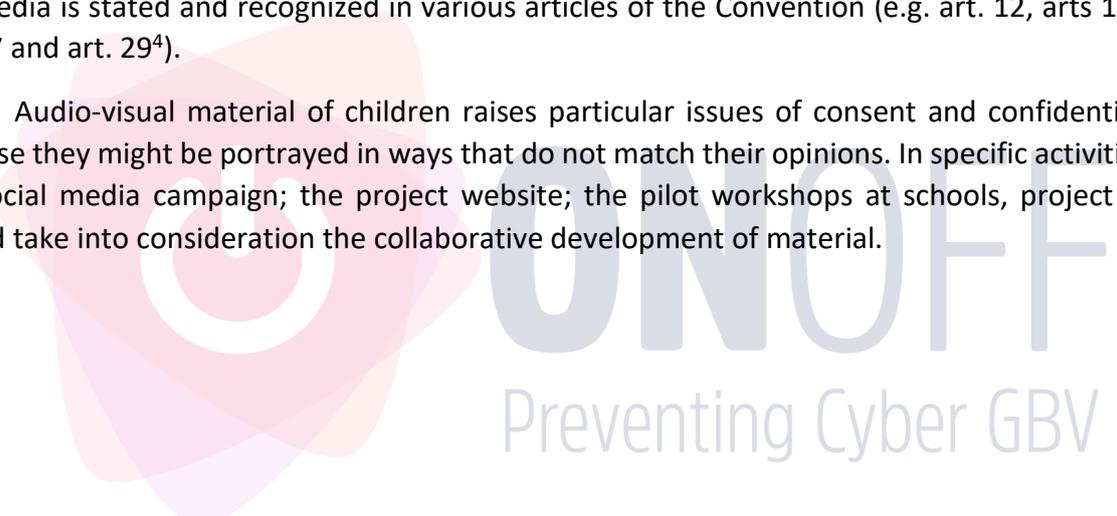
vary according to the legal framework of each partner country. Partners are, thus, advised to obtain information on the age for consent from relevant national authorities.

### Children's Rights & the Media

According to the Oslo Challenge<sup>3</sup> “the child/media relationship is an entry point into the wide and multifaceted world of children and their rights – to education, freedom of expression, play, identity, health, dignity and self-respect, protection – and that in every aspect of child rights, in every element of the life of the child, the relationship between children and the media plays a role” in defining their social identities.

Nevertheless, there are a number of ways in which the rights of children may be violated by inappropriate exposure; project partners have the responsibility to portray children fairly, without doing any harm to them and all the information concerning them should respect the standards and principles of the UNCRC. The significance of the relationship between children and the media is stated and recognized in various articles of the Convention (e.g. art. 12, arts 13-14, art. 17 and art. 29<sup>4</sup>).

Audio-visual material of children raises particular issues of consent and confidentiality, because they might be portrayed in ways that do not match their opinions. In specific activities as the social media campaign; the project website; the pilot workshops at schools, project staff should take into consideration the collaborative development of material.



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<sup>3</sup> The Oslo Challenge, <https://www.unicef.org/magic/briefing/oslo.html>.

<sup>4</sup> Convention on the Rights of the Child, <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

## XII. Ethical Principles for implementing activities with teachers/educators

“For all activities funded by the European Union, ethics is an integral part of research from beginning to end, and ethical compliance is seen as pivotal to achieve real research excellence”<sup>5</sup>.

The present Child Protection Policy describes the principles of practice and provides guidance and recommendations on dealing with ethical aspects specifically for the ON-OFF project. Complying with ethical principles and conditions offers privacy and identity protection of project participants, guaranteeing data quality and confidentiality.

Ethics as an integral component of ON-OFF must be ensured throughout the activities' implementation and production of all outputs. Hence, activities implemented with teachers/educators, young people and decision-makers about preventing cyber GBV must be in line with the standards set out in the UN Convention of the Rights of the Child, [the Council of Europe Convention on preventing and combating violence against women and domestic violence](#) and comply with applicable international, EU and national law. The present policy was produced by reference to documents such as the UN Convention on the Rights of the Child (UNCRC), the Istanbul Convention, the UNICEF Guide on Children's Rights and Journalism, and the Horizon2020 guidelines on how to complete ethics assessment, and the Directive 95/46 /EC on the protection of individuals with regard to the processing and circulation of personal data.

All partner organizations must follow rules on confidentiality and anonymous treatment of all collected data. Furthermore, obtained data must not use in a different context than the one they are collected for.

### Personal Data Protection

Personal data, including the views of the participants must be also protected. Collecting personal data that is not essential to the project may expose project staff to allegations of using data for another reason without additional permission. Hence, project staff may collect and process data only if and insofar as it is really necessary for the ON-OFF project.

### Access

While project staff will need to be guided by the requirements given by the local context with regard about preventing cyber GBV, it is of primary importance that, where possible, participants themselves have the right to decide about their participation in the project. In the case of cyber GBV partner organisations can contact government agencies and organizations along with all competent professionals working closely with the survivors of cyber GBV to seek further information on relevant ethical issues. The decision about whether to participate is to be made by the participants themselves upon receiving comprehensive information on the project.

### Privacy

The ethical issues that might come across when implementing ON-OFF and their mitigating strategy are related to privacy concerns: upon disseminating results and reporting on activities

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<sup>5</sup> Research Ethics, <http://ec.europa.eu/research/swafs/index.cfm?pg=policy&lib=ethics>

implemented, the names of the persons involved will not be disclosed and anonymity will be ensured. Audio-visual material with recognisable features can only be collected and made public with the participants' prior informed consent.

It is essential to specify if the data will be kept stored beyond the duration of the ON-OFF project according to the EU Guidelines for projects co-funded by the Rights, Equality and Citizenship Programme of the European Union.

Measures for preventing risks or invasion of privacy will be set in place by adopting a secured access policy for the collected personal data. The policy will specify the appropriate methods to be used (e.g. password protection, encryption). For more information see the Data Protection and Management section.

### Issues of Consent

If considered necessary by the ON-OFF consortium, participants themselves must give their 'informed consent' before participating in the project activities. This means that prospective participants must be fully informed about the procedures and risks involved (Annex 2).

Consent should be seen as an ongoing process and as something that is renegotiated verbally at each stage of the activities. This procedure enables participants, to withdraw from the project at any time should they wish to do so.

As mentioned in the previous section, by signing informed consent documents (Annex 2), participants agree to a controlled breach of their privacy for a *specific purpose* and a *specific period of time*. According to HORIZON 2020 Guide undertaking a project involving work with human participants' specific information have to be provided (Annex 5). These include details on the procedures and on the measures for ensuring that there is no coercion on participants for participating.

The 'Informed Consent Form' used for adults participating in the project must explicitly state that participation is voluntary and that anyone has the right to refuse to participate and to withdraw at any time. *Consent must normally be given in written form*. Dissent should be respected. The information sheet should include in simple terms an explanation of the background and purpose of the project and also how issues of personal privacy will be protected.

Sample information sheets, sample consent form and finally the signed informed consent forms must be kept and provided to the Responsible of the Child Protection Policy.

### Confidentiality Agreement

To ensure the protection of information and in consideration of the agreement to exchange information, the parties must agree that the Recipient shall *use the Confidential Information only for the purpose of the implementation of the ON-OFF project*. The images and video footage must be protected and used only for the purpose of the project. For this reason, it is the Responsible for the Child Protection Policy's responsibility to retain the footage under clear privacy policy and procedures. Maintaining privacy and confidentiality supports the protection of

participants from potential harms including psychological harm such as embarrassment or distress.

### Women's Rights & the Media

According to UN Women “the media can play a significant role in either perpetuating or challenging social norms and behaviors that condone violence against women. New media can be a platform for the objectification of women and girls, from everyday hyper-sexualized, one-dimensional images of women and girls to overt violence”<sup>6</sup>. The rights of women may be violated by inappropriate exposure and media stereotyping, therefore it is the responsibility of all project partners to portray women fairly, without doing any harm to them and all the information concerning them should respect the standards and principles of the Istanbul Convention. At the same time, the project will encourage a positive perspective of this relationship enhancing the media' influence to remind the public that women need to be treated with dignity and their rights need to be protected accordingly.

### Ethical Issues in the use of video

Audio-visual material represents a powerful medium: it can influence people or make a point in ways that other media cannot. On the other hand, a video can easily violate the privacy of the subject involved.

Privacy is crucial and project staff must decide how to protect the privacy of individuals and members of the expert group and still be able to present their findings. Therefore, it is important to examine the ethical issues involved in the creation and presentation of a video. When the research staff of the ON-OFF project is videotaping for the specific purposes of the project, they should take into consideration how to best create and display the video that will respect all the above standards and rights.

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<sup>6</sup> Women and media, <http://www.unwomen.org/en/news/in-focus/end-violence-against-women/2014/media>

### XIII. Data Storage and Management

Data privacy and protection issues should comply with relevant EU rules which are guaranteed by the application of the Directive 95/46/EC<sup>7</sup> on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

#### Personal Data Protection

Any kind of information, private or professional, which relates to an identified or identifiable natural person<sup>8</sup> is considered to be personal data. Therefore, personal data, including the views of the participants on the topics discussed need to be protected. Collecting personal data should follow clear procedures and guidelines that will lead only to data that is specific for the project avoiding exposing the project staff to allegations of using unwanted data for different reason other than the purpose of the project.

The information services or relevant department should be able to advise the involved staff on setting up secure databases for the different forms of data that will be generated by the project. This guidance must be sought and included in the procedures of implementation before starting the activities<sup>9</sup>.

To protect the contents of your documents, either it is an excel spreadsheet, a word document or a password protected zip file you must follow these steps:

#### How do your password protect an Excel spreadsheet?

First, open the Excel document that you want to secure with a password. Then, click File, Info, and hit Protect Workbook underneath Info. Excel will then prompt you to type in a password.

#### How do you lock a document in Word 2013?

- In an open document, click File > Info > Protect Document.
- Mark as Final Make the document read-only.
- Encrypt with Password Set a password for the document.
- Restrict Editing Control what kind of changes can be made to the document.

#### How do you password protect a zip file?

- Double-click the compressed folder that you want to protect.
- On the File menu, click Add a Password.

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<sup>7</sup>Directive General Data Protection Regulation (EU) 2016/679 (GDPR) of the European Parliament and the Council, <https://eur-lex.europa.eu/eli/reg/2016/679/oj>

<sup>8</sup> An identifiable natural person “means any person who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity”, <http://www.igi-global.com/dictionary/identifiable-natural-person/44347>

<sup>9</sup> Data storage and data security, <http://www.ethicsguidebook.ac.uk/Data-storage-and-data-security-308>

- In the Password box, type the password that you want to use. Type the same password in the Confirm Password box, and then click OK.

#### How do you password protect an Excel file 2010?

To assign a password to an Excel workbook, do the following:

- From the File menu, choose Save As...
- Click the Tools dropdown on the dialog toolbar and choose Save Options. ...
- In the resulting dialog, you can set two passwords: one to open the workbook and one to modify the workbook. ...
- Enter one or both passwords and click OK.

**Choose your password wisely and keep in mind that if you forget it, you'll lose access to that document.**

#### Privacy

Privacy issues also arise when collected data is stored, namely on how long the collected data will be kept and where they will be stored. For the purpose of the present project, it has to be specified that the data will be kept stored beyond the duration of the specific project. Another important issue for preventing unacceptable risks or invasion of privacy is the secured access policy for the collected personal data using the appropriate methods (e.g. password protection, encryption and etc.).

Regarding the processing of personal data and the protection of privacy in the electronic communications sector, as well as the retention of data generated or processed in connection with the provision of publicly available electronic communications services or of public communications networks (e.g. cloud, big data, open data, cookies, etc.) the ON-OFF project must comply with the relevant legislation and in particular with the EU Directive 2002/58/EC on the processing of personal data and the protection of privacy in the electronic communications sector. The Directive is available online on: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32002L0058:en:HTML>

#### Confidentiality Agreement

Preserving privacy and discretion supports the protection of participants from potential harms including psychological harm such as embarrassment or distress.

When preparing for the implementation of the project the partners need to plan for data management in advance. For example, it is recommended to allow time for a database manager or information specialist to develop and manage the systems that enables you to keep your data secure. Before using and collecting the data, one must check the requirements in place for data storage, and available facilities (e.g. data archiving).

Whether collecting new data or accessing existing data, project staff need to take into consideration the way data will be stored, which person have access to the data and in what way

they will be able to access data. Similarly, project staff need to plan for unforeseen and undesirable events (e.g. losing a USB stick or losing important documents). Project staff must have systems in place to protect the participants, themselves and the organizations. For example, losing a USB stick that contains anonymized data is problematic, but it is less problematic if the stick is securely password protected. At the same time, project staff should take account of what it needs to be done with hard copies (such as paper notes of interviews), computer files with anonymized data that are not recognisable, and computer files with personal or identifiable data. Hard copies such as interview notes, prints of photographs, or video must be kept securely locked away (e.g. in a locked filing cabinet that can only be accessed by specific members of the project team).

Throughout the project, project staff should have the following questions in mind<sup>10</sup>:

- Who needs to have access to hard data?
- Will these data be anonymized before they are stored and if not, why?
- Will these data be stored separately from personally identifying data?
- If there is a key, where will the key be stored?
- Could someone find the data and access it who should not?
- How will you deal with hard copies in the period between data collection and data storage?

As a final point, files - including electronic files - that contain personal or recognisable data (e.g. names) must be encrypted or password protected, and only accessed by agreed members of the team. Especially, if project staff share files within the project partners - e.g. on shared computer drives, or by email. Computer files including anonymized must be held securely, and can only be shared according to the terms of consent from the participants. To ensure that anonymized or personal data are only accessible to those that have been agreed (such as your immediate team) additional security system might be needed.

On the whole, the way data protection and privacy issues are taken into account and legally treated, depends on the legal environment of each country (partner organization) where the project will take place. Nevertheless, despite the several differences across EU countries, the application of Directive General Data Protection Regulation (EU) 2016/679 (GDPR) guarantees a uniform approach towards these issues. For a detailed picture of the relevant legal framework, see: <https://eur-lex.europa.eu/eli/reg/2016/679/oj>. Project staff are reminded that compliance with EU rules on data protection and privacy issues is not only necessary but also compulsory when implementing EU projects.

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<sup>10</sup> <http://www.ethicsguidebook.ac.uk/Data-storage-and-data-security-308>

#### XIV. Challenges in implementing the Child Protection Policy

In general, when a Child Protection Policy is implemented, no matter how good it is, it can only act as a guide to support participants of a specific project in order to find answers or solutions to the difficulties they face.

It is important to highlight the fact that there are differences between countries in relation to the law, depending upon their cultures, legal and political circumstances and the stage of development of the profession.

For a child, young person or survivor of cyber GBV who discloses that he or she is currently being abused, the immediate priority is safety and protection from further abuse. In this situation, project staff must notify the appropriate authorities, according to national regulations and protocols. The project staff should support the child, young person or the survivor by believing him or her and reassuring them that telling was the right thing to do. If the project consortium does not have protocols in place for such circumstances, then the management team and the relevant authority/statutory child protection department in your country should be notified. Finally, keeping information confidential is primordial. Only those people *who must know* should be informed of the disclosure.

It is important to remember that it is not the role of project staff to counsel the child/young person/survivor or investigate his or her claims. Disclosure is about seeking support and the right response can have a great impact on the child, young person or survivor's ability to seek further help and recover from the trauma.

The concerns a Child Protection Policy are of real importance in setting high standards, and that is why the content should be reviewed on a regular basis in order to guarantee good practices are in place at all stages of the project<sup>11</sup>.

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<sup>11</sup> <http://www.ances.lu/index.php/arc-bulletin/information/69-a-code-of-ethics-for-people-working-with-children-and-young-people>

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[list/gender-sensitive-indicators-for-media-framework-of-indicators-to-gauge-gender-sensitivity-in-media-operations-and-content/](#)

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**APPENDIX № 1**

**Declaration on Familiarity with the On-Off project consortium's Child Protection Policy**

**DECLARATION**

**From** .....

**Employee at On-Off project consortium in office**

.....

**I,** .....

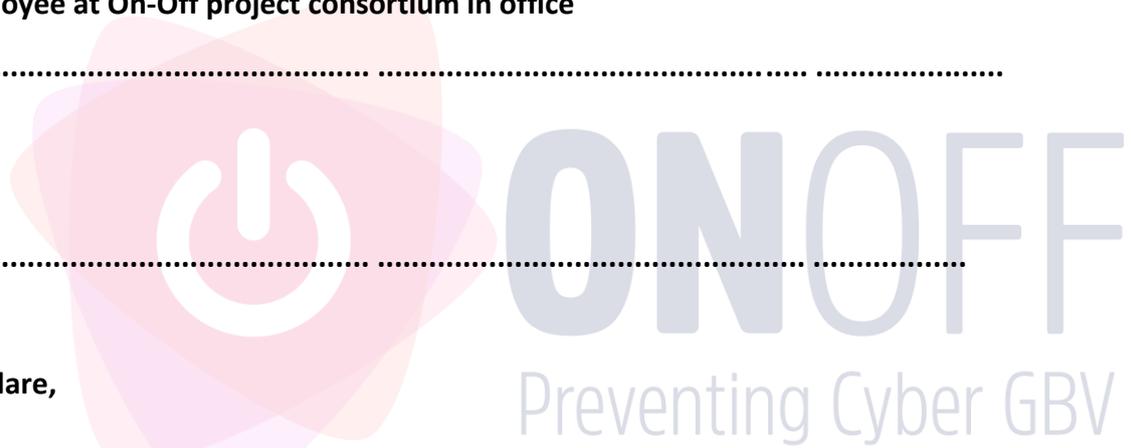
**I declare,**

**that I am familiar with the On-Off project consortium's Child Protection Policy and agree to abide by the requirements, guidelines and procedures of the Policy.**

**Declarant:**

**/ name, signature /**

**Date:**



## **CODE OF ETHICS FOR WORKING WITH CHILDREN**

### **Introduction:**

The Code of Ethics presents the standards for ethical behavior of those working with children in the fields of: education, healthcare, social care, justice, home affairs, etc.

### **The moral code for working with children aims:**

1. To present the basic values and principles that those working with children must know and observe in their practice;
2. To affirm the will and aspiration of those working with children for ethics in their practical activities;
3. To guide behavior and help those working with children in solving ethical dilemmas they encounter in their practice;
4. To outline the moral responsibilities of those working with children: to the child, to the family, between them and to society.

### **Section I**

#### **Basics:**

Those working with children perform their functions guided by the basic values and principles:

Article 1. Childhood is an extremely important period in a person's life;

Art.2. The family is the most natural environment for a child's development;

Art.3. Each child has a unique uniqueness and value;

Art.4. Every child is guaranteed the right to:

- freedom of expression;
- freedom of thought, conscience and religion;
- formation of own views and the right to express them freely;

Art. 5. Every child has the right to protection against methods of upbringing, physical, mental or other violence or forms of influence that violate her/his dignity;

Art. 6. Every child has the right to protection of his or her normal physical, mental, moral and social development.

Art.7. Every child and every family deserves to be helped to develop their full potential.

Art.8. In all cases, to best protect the interests of the child;

Art. 9. Every child at risk needs special protection to get her/him out of the risk situation;

Art. 10. Gifted children shall enjoy special protection measures;

Art. 11. Those working with children must have certain personal, moral and social qualities.

## **Section II**

### **Moral responsibilities to the child**

Art. 12. To base our practice on the modern knowledge about the child's development and the knowledge of the individual peculiarities of each child.

Art. 13. To understand and respect the uniqueness of each child.

Art. 14. To take into account the specific vulnerability of each child.

Art. 15. To create a safe and healthy environment that stimulates the social, emotional and physical development of the child.

Art. 16. To support the right of the child to freely express an opinion on all issues of her/his interest.

Art. 17. To work in the best interest of the child.

Art. 18. To provide children with disabilities with equal opportunities for access to adequate care and education.

Art. 19. Not to participate in practices that do not respect the dignity of the child or are dangerous and harmful to her/his physical and emotional health and development.

Art. 20. Not to engage in practices that discriminate in any way against children on the basis of race, ethnic origin, religion, gender, nationality, language, ability, or on the basis of the status, behavior or beliefs of the parents.

Art. 21. To know the symptoms of violence against a child - physical, sexual, verbal, emotional abuse or neglect. To know and follow the laws and procedures that protect the child from violence.

Art.22. In case of suspicion of abuse, we should inform the child protection authorities and monitor whether the necessary measures have been taken.

Art.23. When another person expresses suspicion of child abuse, we should fully assist him or her in taking appropriate action to protect the child.

Art.24. When we become aware of actions or situations that threaten the health and safety of the child, we have a moral and legal responsibility to inform the child protection authorities.

### **Section III**

#### **Moral responsibilities to the family**

Art.25. Our primary responsibility is to support the family in raising and educating children.

Art.26. To respect the dignity of each family and its culture, customs, language and beliefs.

Art.27. To respect the values of the family in the upbringing and education of children and their right to make decisions for their children.

Art.28. Inform the family of all decisions concerning the child and, where appropriate, involve him or her in making such decisions.

Art.29. Respect the family's right to be informed about the way we work with the child.

Art. 30. To inform parents about research projects involving their children and to strive to give them the opportunity to exercise their right to refuse participation without feeling guilty. Do not allow or participate in research that may in any way endanger the health, education, development or well-being of the child.

Art.31. Let's not use our relationship with the family for personal gain. Do not enter into relationships with family members that could harm the effectiveness of our work with the child.

Art.32. To ensure the confidentiality of information and to respect the family's right to privacy, except in cases of abuse and ill-care. This does not apply in cases where we have reason to believe that the child's well-being is at risk.

Art.33. We are committed to developing confidentiality rules that are accessible and mandatory for all staff and families. Disclosure of confidential information about the child can only be done with the permission of the family. This does not apply in cases of abuse and poor care.

Art.34. In cases where there is conflict between family members, we will work openly, sharing our observations of the child, to help all parties involved make an informed decision, and will strictly refrain from taking sides in the conflict.

### **Section IV**

#### **Moral responsibilities to colleagues**

Art.35. To build and maintain relationships of respect, trust, cooperation and collegiality.

Art.36. To exchange information and resources that are relevant to the well-being and protection of children's rights.

Art.37. To work for the assertion of our own and our colleagues' authority, refraining from actions that would damage the prestige of the profession, and to show intolerance to such actions.

## **Section V**

### **Moral responsibilities to society**

Art.38. To provide high quality programs and services. We will not offer services for which we do not have the competence, qualifications or resources and legal capacity.

Art.39. To work to create a safe social environment in which the child can receive adequate health care, food, shelter, upbringing and live without violence.

Article 40. To work for the improvement of the cooperation between the organizations as well as for the interdisciplinary interaction between the professions, which are related to the well-being of the children and the family.

Art.41. To help increase the level of understanding of children and their needs in society.

Art.42. To work to promote the rights of children, as well as to increase the sensitivity of society to their violation.

Art.43. To work to support laws and policies that support the well-being of children and their families and to oppose those who violate it.

### **I undertake:**

1. To respect the uniqueness and potential of each child.
2. To work in the best interests of the child.
3. In my work, in no case should I use corporal punishment and educational methods that undermine the dignity of the child.
4. To respect and support families in raising and educating children.
5. To respect colleagues and to support and encourage them in implementing the rules of ethics / code /.
6. To maintain a high standard of professional conduct by constantly enriching my knowledge and skills.
7. To serve as an advocate for the child and the family in the community and society.
8. To observe the ethical rules set forth in this code.

**Appendix № 3**

**Declaration of consent to the use of images**

**DECLARATION**

from

**Name:** .....

**ID No** .....

**Born on** ..... **from** .....

**Address:** .....

I declare that I was previously acquainted with the policy of the On-Off project consortium regarding the use of photos and images.

With this declaration I agree with the conditions and recommendations set by .....  
under which to use and publish photos of my child:

....., born on .....

**Date:**

**Signature:** .....

**Appendix No 4**

**Incident reporting, reporting of fear, suspicion and / or identified violence against a child**

**REPORT FORM**

<b>Names of the child:</b>
----------------------------

<b>Data related to the receipt of the information:</b>
Time:
Date:
Place:
<b>Reporter data:</b>
The three names:
Address:
Contact data:
Occupation:
<b>Relationship with the child:</b>
Data for the child:
The three names:
Age: Date of birth: Gender:
Address:
Household structure:
School: Class: Class teacher:
Religion: Disabilities, if any:

<b>Changes in the child's behavior?</b>
---

<b>Other information:</b>
---------------------------

**Details of the concern (including words spoken by the child if possible)**

**Details of the alleged perpetrator:**

**Child safety at the moment:**

**Emergency medical care?**

**Who else is aware?**

**Actions taken so far?**

**Made by:**

**Date:**

## Appendix № 5

### Mechanism for reporting child protection policy concerns and / or incidents

1. EMPLOYEE, CONSULTANT, VOLUNTEER, CLIENT, PARTNER

- Doubts about child abuse
- Information on violence
- Registered incident

2. ORAL NOTIFICATION

- The manager of the On-Off project consortium
- The person designated and responsible for compliance with the Child Protection Policy
- According to the reporting procedure

3. WRITTEN NOTIFICATION

The manager of the On-Off project consortium and the person designated for compliance with the Child Protection Policy through:

- Reporting form

4. SIGNAL ASSESMENT

- Risk assessment

5. NOTIFICATION OF THE COMPETENT AUTHORITY FOR PROTECTION

- ORAL
- IN WRITING

## Appendix № 6

### List of organizations and professionals who would support reporting and timely and adequate response to concerns

1. Child Protection Department of the Social Assistance Directorate
2. Police
3. Prosecution office
4. Complex for social services for children and families
5. Non-governmental organizations dealing with the protection of the human rights of children

