

CONCORDIA CHILD PROTECTION POLICY



CONCORDIA Child Protection

“All children have the same rights, no matter who they are, where they live, which language they speak, what their religion is, what they think, what they look like, how they identify, if they have a disability, if they are rich or poor, and no matter who their parents or families are or what their parents or families believe and do. No child should be treated unfairly for any reason.”

Approved by the International Board of CONCORDIA Social Projects

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Foreword from the International Board

With the Child Protection Policy presented here, the CONCORDIA Social Projects International Board is sending out a clear signal to the children, young people and families entrusted to us. Namely, to do everything in our power to protect children from any form of violence and to continuously develop and implement innovative measures, and to keep CONCORDIA a child-safe organisation.

This policy, which is addressed to all employees, volunteers, supporters and relevant authorities, outlines the definitions we have for violence, the mechanisms in place to intervene and prevent violence in and outside the organisation, as well as specific directions for action we demand so that children can experience a safe, happy and self-determined childhood and youth in CONCORDIA facilities but also in their immediate environment.

We are committing ourselves to regular evaluation of the measures taken and the standardised involvement of all CONCORDIA employees in personnel management.

We proudly claim that many child protection measures have already been in place in the organisation for years, and this child protection policy consolidates them officially in a written form. During the development of this document, we consulted and interviewed the children, adolescents and families we care for, as well as CONCORDIA employees, reaffirmed the significance of the topic for the organisation.

Moreover, this policy seeks to address the changing circumstances that children are currently experiencing in their environment, whether it is new legislation such as the General Data Protection Regulation, or the reality of social media, which poses a major challenge not only in the daily work with children, but also in communication with supporters, and necessitates careful re-examination and partial re-orientation of implemented measures.

The policy includes a specific Code of Conduct and a list of measures that are to be taken by CONCORDIA employees in the case of any suspicion of violence against children.

All people working in CONCORDIA Social Projects are very aware that the protection of the children entrusted to us is the greatest good in the everyday challenges of our work in all areas and needs moments of critical reflection and courageous steps again and again in everyday life.

Thanks to all the CONCORDIA supporters for assisting us and respecting our position!

Ulla Konrad

Member of the Board

1. Introduction

Violence against children is an international phenomenon¹ which takes place in different settings and societies. Children of all ages are at risk of experiencing or witnessing violent discipline, domestic abuse, bullying at school, and sexual, psychological or economic abuse which can take place in their everyday settings: at home, in schools, in care settings, on the streets, in emergency shelters or during school trips. Perpetrators could be their parents, other family members, foster parents or other caregivers, teachers, medical staff, or other children. Some children are particularly vulnerable to abuse due to their gender, race, ethnic origin, disability, sexual orientation, religious beliefs or social status. As adults and as professionals, it is our responsibility to work hard to prevent child abuse, to pay close attention and to recognise signs of abuse and behavioural change, and to respond to these signs timely and appropriately.

1.1. About CONCORDIA Social Projects

CONCORDIA Social Projects (hereafter referred to as CONCORDIA) is an international, independent, nongovernmental organisation present in Austria, Bulgaria, Kosovo, Romania, the Republic of Moldova, Germany and Switzerland. The national offices in each country provide social and educational services dedicated to supporting children, young people and families in need on their way to an independent and responsible life. CONCORDIA works with different target groups and provides a variety of services. We strengthen families at risk and prevent family separation with the help of our services at Day centres and outreach community work. We support children and young people who are separated from their families due to various reasons and are in acute need of a safe and nourishing family environment through our family-like services. CONCORDIA helps children and mothers with small children with experience of abuse by offering them protected accommodation in crisis centres and providing emergency interventions for urgent safeguarding cases. We support teenagers and young people focused on the educational component and development of life skills on the way to self-determined living via offering services at vocational centres, centres for the development of life skills, and transitional and supervised apartments.

Our mission and vision

- CONCORDIA is an international, independent aid organisation dedicated to helping children, young people and families in need.
- CONCORDIA accompanies children and young people on their journey towards a self-determined life. We open chances through education and vocational training and we help young people to obtain the necessary skills for independent life in dignity and outside of marginalisation.

¹ According to *Ending Violence in Childhood: Global Report 2017* by the Global Initiative „Know Violence in Childhood”, almost 75% of all children are subjected to violence each year.

- CONCORDIA activities contribute to fighting the circle of generational poverty. We go where the need is the greatest.
- We orient ourselves towards our core values which are entrenched in all organisational policies: heart connection, commitment, courage and chance.
- CONCORDIA is guided by the International Conventions on Children's and Human Rights and by the European Child Guarantee. We contribute to creating an open, resilient and united society.

1.2. CONCORDIA statement on child protection

CONCORDIA enables children to enjoy a happy and healthy childhood. Its work is anchored in the **United Nations Convention on the Rights of the Child** (UNCRC, 1989). All CONCORDIA organisations stand for and share the common commitment to protect children from all forms of physical, economic and psychological violence, neglect, maltreatment and exploitation, including sexual abuse² and child trafficking. CONCORDIA's work is meant to protect all children's rights as stipulated in the UNCRC, as well as in the national legislation on promoting and respecting children's rights in the countries in which our services are offered. In all actions that we take with and for children, CONCORDIA is committed to safeguarding children and reporting and responding to any alleged abuse, taking the necessary measures as stipulated in the internal national policies and procedures, no matter the source of the referral and the alleged perpetrator. The *do no harm* principle is a central tenet of the philosophy of the organisation.

In CONCORDIA our target is that 100% of reported child protection cases are investigated and that adequate measures are put in place.

1.3. About this document

The Child Protection Policy of CONCORDIA was developed through a bottom-up process and numerous consultations with children, young people, family members, co-workers, management staff, volunteers and partners, because we value their opinions, beliefs, feelings and experiences. The policy is rooted in our mission, values, approaches, and services, and thus is to be respected and abided by all employees, volunteers, board members, donors, visitors as well as by the children and young people in the organisation. The policy has been developed to ensure the highest standards of professional behaviour and personal practice so that no harm is done to children and young people during their involvement in activities, projects and programs within the organisation.

² UN Convention on the Rights of the Child (1989), Article 19

2. Principles underpinning CONCORDIA's Child Protection Policy

Child safeguarding is organisational responsibility to make sure that their staff, operations and programmes do not expose children to the risk of any kind of harm and abuse, and that any concerns the organisation has regarding children's safety within the communities in which they work are reported to the appropriate authorities.

"Do no harm" is a principle that has been used in the humanitarian sector but can equally be applied to the development field. It refers to organisations' responsibility to minimise the harm they may be doing inadvertently as a result of their organisational activities.³

The following principles are the foundation of this policy:

- All children and young people involved in our activities, projects and programmes have equal rights to protection from any form of violence, and their best interest and well-being are always considered;
- All children and young people know about their rights and responsibilities towards others;
- All children and young people are asked and consulted regarding the decisions that affect them, and their opinions are taken as paramount;
- We value and respect all children in the context of their own culture, religion and ethnicity;
- We do our work for children in partnership with authorities, schools, kindergartens and other NGOs. Our partnerships are carried out in a trustful, transparent and long-term manner, and we therefore expect the *do no harm to children* approach from all our partners.

³ Keeping Children Safe Coalition 3: www.keepingchildrensafe.org.uk



Child Protection Case Management

3. The goals of the Child Protection Policy

CONCORDIA works with vulnerable children and young people, and in all our activities and decisions taken we approach the best interest of the child as the main point of reference. The services we provide for children in the national organisations are functioning according to the national legal provisions.

The goals of the policy are:

- To assure that 100% of the cases are investigated, adequate measures are put in place and the safety of the involved parties is secured;
- To have trained and informed staff and volunteers in ethical behaviour towards children, to prevent children's rights violation, to be able to identify any signs of abuse against children and report them;
- To have the respect towards the rights of children and ensure a safe and trustful environment for them by all the individuals who are collaborating with CONCORDIA in their quality of Board members, consultants, contractors, partners, sponsors and donors, guests and visitors, journalists, animators or accompanying persons;
- To have all CONCORDIA programme participants informed about their rights and follow the appropriate behaviour towards their peers, colleagues, volunteers and family members;
- To be a child-safe organisation committed to tackling child abuse, and to provide guarantee for parents, donors and the general public for quality, effectiveness and accountability of our work;
- To assure that any case of violence and abuse against children is immediately reported, no matter if it is a suspected or an actual case;
- To create and maintain reliable reporting and feedback mechanisms to prevent any kind of harm towards children inside and outside the organisation.

The Child Protection Policy is complementary to all policies and procedures of our organisation and is accompanied by a detailed CONCORDIA Child Protection Policy Operational Manual as a key guidance document for putting the policy into practice.

4. Relevant legislation

CONCORDIA's Child Protection Policy is based on the following Conventions, Guidelines and Laws:

- United Nations Convention on the Rights of the Child, 1989⁴
- The standards on child protection as defined by the Keeping Children Safe Coalition, 2014
- United Nations Statement for the Elimination of Sexual Abuse and Exploitation, 2017
- United Nations Guidelines for the Alternative Care of Children, 2010
- European Commission, European Agenda on Migration, 2015
- The Council of Europe Convention on Protection of Children against Sexual Exploitation and Sexual Abuse, also known as “the Lanzarote Convention”, 2007
- National legislation on children’s rights from Austria, Bulgaria, Kosovo, Moldova and Romania
- The UN Convention on elimination of all forms of discrimination against women (CEDAW). It doesn't directly cover protecting children from violence but emphasises eliminating discrimination against women in family matters, prioritising children's best interests; General Recommendation No.35 emphasises considering women's and children's rights to life and integrity and prioritising the best interest of the child in legal proceedings involving perpetrators' rights.
- Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention). It is the first legally binding European instrument to combat violence against women and girls which recognises children as victims of domestic violence, mandates public awareness campaigns on various violence forms impacting children, requires specialised support services for women victims and their children, stipulates protective measures for children who witness violence, and urges consideration of the impact of violence in custody determinations, ensuring safety assessments and managing risks related to repeated violence, including assessing the perpetrator's access to firearms.
- The Charter of Fundamental Rights of the EU. It mandates protection and care for children's wellbeing, emphasising their right to be heard and have their views considered based on their age and maturity, while also prioritising the best interest of the child in all actions concerning children's rights.
- EU Victims’ Rights Directive (Directive 2012/29/EU). It ensures rights and protection for all crime victims, specifically acknowledging the needs of those, who have experienced gender-based violence and child victims; it mandates the right of children to be heard in criminal proceedings, safeguards their privacy, and presumes that child with experience of violence have specific protection needs due to their vulnerability, encouraging

⁴ Date of signature by Austria, Germany and Romania was 26 January 1990; Bulgaria signed it at 31 May 1990 and Republic of Moldova ratified it at 26 January 1993 and Republic of Kosovo at 27 June 2019.

awareness-raising actions in collaboration with civil society organisations to mitigate risks of secondary victimisation, intimidation, and retaliation.

- The EU Directive on combating sexual abuse and sexual exploitation of children and child sexual abuse materials (Directive 2011/92/EU). It focuses on preventing such crimes, establishing minimum rules for defining criminal offenses and penalties for perpetrators, and ensuring protection for child victims to effectively combat and safeguard against sexual abuse and exploitation.
- Council of Europe Strategy on the rights of the child 2022–2027. It emphasises child-friendly justice, urging the adaptation of legal procedures to meet specific children's needs and prevent their re-traumatisation and re-victimisation, highlighting the importance of a framework that prioritises the well-being of children within legal proceedings.

5. Definitions

Child protection is the protection of children from violence, exploitation, abuse and neglect as stipulated in Article 19 of the UNCRC which emphasises that State Parties must have proper laws in place to prohibit violence and to implement administrative, social and educational measures to protect children. In the current context, the term means the duty of the organisation and its employees, collaborators and volunteers to protect children in their care from both, intentional and unintentional harm. Child Protection is part of the entire safeguarding process that an organisation implements to prevent harm to children and to respond in cases of harm.

According to the definition contained in Article 1 of the UN Convention on the Rights of the Child: “Child is every human being below the age of 18 years unless, under the law applicable to the child, majority is attained earlier”. Nevertheless, the present policy applies to young people above 18 years old who participate in CONCORDIA services, according to the national legislation on the promotion and protection of children’s rights.

„Violence against children” is “all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse”, according to the Article 19 of the UNCRC. The World Report on Violence and Health (2002) defines violence against children as “the intentional use of physical force or power, threatened or actual, against a child, by an individual or group, that either results in or has a high likelihood of resulting in actual or potential harm to the child’s health, survival, development or dignity.”

CONCORDIA defines violence against children as any form of physical and psychological (mental and emotional) harm to children, sexual abuse, neglect, bullying, economic exploitation, exploitation through labour, sexual exploitation, abduction and/or disappearance, risky migration, trafficking, internet violence and grooming, child (sexual) abuse material and source, image-based sexual abuse which includes offline and online non-consensual sharing of real or fake images or videos. Violence against children can take place in family, school, health system, child specialised protection system (foster care, family type homes, placement centres), other services like day-care, community centres and after-school, online, in (the mass) media, in leisure activities, trips or camps. It includes violence perpetrated

against children by adults (parents and caregivers), as well as peer-to-peer violence. Additionally, it includes children witnessing violence in the media listed above. **Violent discipline at home (in family or in alternative forms of care) is the most common form of violence** experienced by children., Many caregivers rely on the use of violent methods, both physical and psychological, to punish unwanted behaviour and encourage desired one. Caregivers do not necessarily use this type of discipline with the deliberate intention of causing harm or injury to the child, but they do it out of anger, frustration, lack of understanding or lack of knowledge of non-violent methods of raising a child.

6. Preventive actions

CONCORDIA is committed to creating a safe environment for children and to guaranteeing their wellbeing and their best interest. One of the crucial focuses of our work is awareness-raising and prevention which decrease the risk of the case of violence against children in the first place. This policy, together with the procedures for its implementation (as defined in CONCORDIA Child Protection Operational Manual), have been widely applied among our staff, volunteers, partners and children, and have firmly integrated into our organisational culture. Special attention is given to the cases of bullying and peer-to-peer abuse. These cases are closely investigated with the support of both parties involved.

6.1. Human resources

CONCORDIA Child Protection Policy applies to all staff, board members, volunteers and collaborators and short-term or part-time experts, who are linked to the organisation in their quality of employees, representatives of the main decision body, and who are bound by volunteer, civil or service contracts with CONCORDIA.

6.1.1. CONCORDIA Staff

CONCORDIA HR policies introduce specific measures to ensure the implementation of the principles of Child Protection Policy at all levels. Starting at the recruitment phase, we promote and state CONCORDIA's **zero tolerance** to child abuse, specifying it in the vacancy announcement⁵. Every CONCORDIA job description clearly states the ban on child abuse and features our Code of Conduct in Annex.

CONCORDIA guidelines for the selection of employees are mandatory on cross-country level. This includes criminal and medical records and references from previous employers, among other. For the positions which include direct work with children, there is an obligatory second interview and shadowing period. Additionally, child protection performance indicators allow the organisation to track the implementation of regulations by all employees. These indicators are monitored every six months.

In their first six weeks of employment, all new members of CONCORDIA team undertake an intensive onboarding program, which consists of training sessions on roles and

⁵ For employment, the candidates will present the criminal record and the result of the occupational medical examination in accordance with the legal provisions applicable to this field of activity.

responsibilities, children's needs, how to recognise signs of abuse and which reporting mechanisms are in place. On the occasion of violation of the Child Protection Policy or the Code of Conduct, the organisation reserves the right to terminate the employee's contract immediately. On the occasion of violence against children, the organisation is obliged to inform the respective authorities.

All new employees and collaborators on civil or service contracts are obliged to participate in session on Child Protection Policy as part of their onboarding period. Current employees and collaborators take part in regular information and training sessions on Child Protection Policy and the Code of Conduct. Any breach of the Code of Conduct or any behaviour which is in contradiction with the current policy is to be investigated and measures are to be taken according to the HR policy, Rules of Interior and national legislation. This can lead to penalties, suspension or dismissal.

CONCORDIA assigns the respective National Focal Points on Child Protection (NFPCP) in each national office, whose role is to closely monitor the fulfilment of child protection regulations on site. NFPCP are the first point of contact for programme participants and employees regarding questions and concerns related to CPP. The assigned national focal points deliver the onboarding training for all new employees and volunteers, keep detailed records of child safeguarding topics, have regular meetings with the International Child Protection Officer⁶ and receive updates at workshops. In case NFPCP is temporarily not available, there is an assigned Person of Trust in each centre, identified individually for and by each child. Person of Trust is a CONCORDIA employee with whom child feels comfortable talking in case they feel unsafe in a certain situation or in the presence of a certain person. The Person of Trust is obliged to communicate to NFPCP potential abuse allegations and safety concerns, and together they decide on the following procedures and internal investigation.

6.1.2. Volunteers

CONCORDIA follows internal guidelines on the selection of volunteers, including the request of criminal and medical records from perspective volunteers and references from previous employers or teachers. All volunteers are obliged to read and sign the Code of Conduct and the Child Protection Policy. In first six weeks of their assignment, volunteers undertake an intensive onboarding programme learning about internal roles, responsibilities and restrictions, children's needs, recognising signs of abuse and learning reporting mechanisms. If volunteer fails to behave according to the Code of Conduct and the current policy, CONCORDIA reserves the right to terminate their volunteer contract at any point of time.

6.1.3. Board members

All CONCORDIA Board members commit to fulfilling the Child Protection Policy and Code of Conduct of the organisation. They have the overall responsibility to oversee and ensure the policy's implementation within the national organisations. Once a year, the Board receives a report on child protection prepared by the national management team with the support of NFPCP and compiled and approved by the International Child Protection Officer. The analysed results are followed by annual child protection action plan which is monitored on a quarterly basis.

⁶ Role Profile of CONCORDIA International Child Protection Officer:

https://www.concordia.or.at/fileadmin/user_upload/DACH/Files/CONCORDIA-RoleProfile-InternationalChildProtectionOfficer.pdf

6.1.4. Awareness raising, training and supervision

CONCORDIA ensures that Child Protection Policy is accurately understood by all those to whom the policy applies. The policy is translated into the languages of national organisations (including Ukrainian due to recent events). Training and supervision are essential for child safeguarding in the organisation, hence all new employees, civil and service contractors, short-term or part-time experts, volunteers and Board members receive a training on organisational Child Protection Policy. They receive an in-depth training tailored to their specific roles and responsibilities towards children within the first three months of their assignment.

For the current employees/volunteers/experts/collaborators, a learning analysis has been conducted with the purpose of understanding and identifying the learning requirements which will enable them to fulfil and apply the provisions of the Child Protection Policy and its implementation procedures. An in-depth training curriculum was developed tailored to the identified learning needs. All employees should know the roles, responsibilities and mechanisms for preventing child abuse and for reporting and responding to child abuse allegations. A wide range of capacity-building activities and exchange events are part of the organisation's portfolio, and all employees are encouraged to proactively participate.

Annual training and information sessions on child safeguarding, including awareness-raising and reporting systems, are organised for all employees. Moreover, the staff with particular responsibilities towards children continuously benefits from a supervision programme which features diverse case studies and solutions and discusses approaches and challenges. A child-friendly policy was elaborated with the support of children and young people⁷. Children receive regular information sessions tailored to their age and were level of understanding. The document is accompanied by a child-friendly video⁸ targeting the youngest ones and focusing on children's key rights. Both materials are available in languages of national organisations. A mandatory requirement for a partnership agreement with CONCORDIA is to commit to the “**zero tolerance to abuse**” policy. CONCORDIA assures that everyone connected to the organisation has a clear understanding of abuse and all its implications on children's mental and physical development and their emotional well-being.

6.2. Building child-safe projects and programmes

6.2.1. Child-focused approach

Engaging children and young people in processes, activities and decision that concern them is a central characteristic which makes our projects and programmes more effective and responsive to children's individual needs. We encourage children's and young people's participation by offering them the option of being organised in children's councils, where they can learn how to speak up for themselves and get engaged in decisions regarding their lives.

We expect our staff to observe children and talk to them to mitigate the cases when children are afraid to talk about bullying or discrimination happening to them or their peers in school or in

⁷ CONCORDIA Child Protection Policy – Child Friendly Version:

https://www.concordia.or.at/fileadmin/user_upload/DACH/Files/Kinderschutzrichtlinie/CPP-childfriendly.pdf

⁸ CONCORDIA Video on Children's Rights: <https://youtu.be/6mS2E2waXyk>

their neighbourhood. In this regard, we respect the following principles when it comes to working with children:

- **The child alone decides about his or her own body:** adults must learn to respect children's bodies and not to touch, hug, kiss or lift them up without paying attention to children's verbal or non-verbal signs and without child's consent. A child has the right to accept gifts without having to hug and kiss gift giver in return. Children must be taught that they are unique and lovable, and that they have a right to decide about their own body and to say no to unwanted touch.
- **The child's feelings are valid and important:** children need to know that they can and may feel differently than their parents, caregivers, other adults or peers. With this knowledge and considering their own feelings, it is easier for them to avoid unpleasant moments without having fear of being rejected. A key step towards protection against sexual abuse is to encourage children to express unpleasant feelings. Body parts and actions must be named precisely and without harmful taboos. In this way, we can timely recognise actions that child experiences as disturbing and unpleasant, and react to them accordingly. Children must be supported in determining for themselves which touches are pleasant for them and which are not.
- **Children have the right to say "no":** children should learn to perceive their needs and set their limits in everyday situations. Adults must empower them to do so and to respect these limits to prepare them to defend themselves against any threats. Certainly, we must pay attention to situations in which close physical contact could be unpleasant but unavoidable, such as a visit to the doctor. When children learn to set their own boundaries, they also learn to respect the boundaries of others.
- **There are good secrets and bad secrets:** it is important to teach children and help them understand the difference between children's secrets (surprises, pranks with peers) and blackmail and bribery. Children need to be encouraged to share bothering or distressing secrets they have been entrusted without feeling guilty.
- **Where to seek help:** children often find themselves in situations when they cannot cope on their own. They often turn to adults who might not take their words seriously or believe them. Children should be encouraged not to give up and to ask for support. They need to know that it is their right to seek help and they should be aware of where to find it, e.g. NFPCP or the Person of Trust.
- **It's not child's fault:** children who are being abused often experience the feeling of guilt imposed by the perpetrator so that they do not speak up about the violent experience. The child's best interests should be the primary consideration in all matters involving or affecting them. If there is a safeguarding concern, people should only be involved on a need-to-know basis.

6.2.2. Risk assessment

CONCORDIA is committed to planning, designing and delivering projects and programmes that are safe for all children, programme participants and employees. During the planning stage of new projects, we conduct needs and risk assessment together with the programme participants and communities. As a next step, we take risk mitigation actions before the final decision on setting up a new service is met. Risk assessments are then conducted periodically to make necessary adjustments when required. Moreover, risk assessment is conducted prior to any

kind of activity that might do harm to children, for example, trips or camps. If the risk is too high and cannot be reduced, the project or activity is not implemented further. The decision is then taken accordingly by the management of the organisation.

6.2.3. Setup of new projects

When projects are being set up, all stakeholders should be engaged: children, families, communities, local authorities and other public decision-making bodies. National standards for social services should be followed, when these exist and are legally bounding. There should be clear selection criteria for all users and a defined number of maximum capacities of each service. No discrimination based on ethnicity, religion, gender etc. is allowed when setting up the criteria for selection of the programme participants. All services and corresponding activities are presented to all programme users. A detailed workshop on one's rights and responsibilities takes place and a service contract is signed according to the legal provisions of each country. Parental or legal guardian's and child's consent should be taken in writing as soon as new projects or activities commence. Also, both, the child and the parent/guardian/legal representative are informed on how they can report any violation of the child's rights and the possible consequences of such actions (organisation's telephone number, person of trust in each centre and contact details of the person in charge (National Focal Point for Child Protection)

6.2.4. Partners

When selecting partners for our projects we check if there was any misconduct in their past activities, if they have a sound reputation, an ethical code for their employees or a child protection policy of their own, if this is the case. Moreover, all partnership agreements and service contracts include ethical aspects and obligations regarding children's safeguarding. If the scope of the partnership or the contracted services involves direct contact with children, the Child Protection Policy and the Code of Conduct have to be assumed and signed before commencing the activities. Should allegations of an incident or violation of children's rights take place during the partnership or contracted service implementation, CONCORDIA reserves the right to conduct an investigation and terminate collaboration with partner immediately.

6.3. Media and communication

CONCORDIA commits to undertaking all its communication activities putting safety for its programme participants on the first place. CONCORDIA Child Protection Policy, the International Code of Conduct and the Visual Storytelling Guidelines⁹. serve as a basis for this commitment. In all communication and fundraising activities, we are committed to protecting the image of the child, their privacy and dignity. For all children in our care or any service of the organisation, there must be a Photo Consent Form signed by the parents/legal representatives before any footage of them is produced (pictures or videos). Correspondingly, at events where mass media is present, the parents/legal representatives have to be informed about the subject and the purpose of the footage in advance. Any images of children taken for organisational purposes must respect the dignity of the child: child's real name is not to be revealed in any external

⁹ CONCORDIA Visual Storytelling Guidelines:
https://www.concordia.or.at/fileadmin/user_upload/DACH/Files/Visual_Storytelling_Guideline_ex2023.pdf

reports. For communication and fundraising purposes, it is preferable to use pictures from the picture bank to avoid uploading real images of the children on the internet and social media. Especially in cases when communication material contains sensitive information about a child, a real image is to be strictly avoided (children in crisis centres). In any event, in which journalists are involved, they will be informed about CONCORDIA's internal regulations regarding footage of children and will be asked to adhere to the organisation's Visual Storytelling Guidelines. Before the external materials are published, they must be approved by the communication experts of the organisation and in some cases by the International Child Safeguarding Officer. Personal stories of children used for reports, communication or fundraising purposes should evoke not only the problems they were confronted with, but also the strengths and support nets they found or may find to overpass them. We do not ask children to promote a certain brand of a company in return for a donation, e.g. pictures of them wearing hats with a company brand. Children may take pictures wearing clothing items with logos of companies by their own choice, but this is not connected with any expectations of receiving donations. CONCORDIA prohibits the employees, board members, volunteers, visitors, and other persons who are in contact with our children to post unofficial pictures or videos of children they met in the organisation on social media or other media channels. It is only permitted to like or share official posts of the organisation. "Tagging" children shown in photos or videos is not permitted. Young people are also educated not to share official CONCORDIA posts and tag themselves in the pictures. The employees are not allowed to be friends on their social media accounts with children and young people, who are using any CONCORDIA services. No personal information and pictures are to be exchanged between CONCORDIA staff and CONCORDIA programme participants. Social media accounts should be used as an opportunity to raise awareness about internet safety and to educate young people on how to ensure safe digital use.

6.4. Sources of funds

CONCORDIA's sources of funds are screened against compliance with our values. We look for financial support from companies or major donors whose image, behaviour and products are not harmful to children, families or communities. Therefore, we do not accept or seek financial support from companies producing or distributing mass destruction products, products causing damage to health or the environment (tobacco industry, spirits industry, weapon industry, industry with content of sexual images), or involved in scandals related to use of child labour, corruption and money laundry¹⁰. CONCORDIA cannot be made responsible for receiving donations from companies or foundations which hid their illegal activities that could not be identified as a result of our regular screening of public sources. On the occasion when ethical misconduct of one of the donors is revealed in public, the Board is to decide about the future actions.

6.5. Visitors

All visits to the organisation should be planned in advance taking into consideration children's schedule. Prior to the visit, visitors should submit a list of names, functions and companies they are affiliated with. This list should be sent in advance to the attention of the responsible person: project coordinator, PR officer or the executive director. The visitors should be informed in advance about the activities which take place in the respective services and about any special

¹⁰ See „CONCORDIA strategy for business cooperation “- Stuttgart 28 December 2017

regulations. The visitors will be accompanied by CONCORDIA staff during the entire visit to the service, assuring adherence to all internal regulations. The visitors are expected to respect the date and time of the planned visit, respect the guidance of the CONCORDIA staff accompanying, treat children and their families with respect and dignity, not to exchange contact details or communicate with children outside the project, not to show favouritism to a certain child, not to take photographs or videos of an individual child without permission of the family or the organisation, avoid inappropriate language or behaviour with children, not to label the children, offend them or express a discriminatory position towards them. Moreover, any visitor must not enter the private space (bathrooms, sleeping rooms) of the children under any circumstances. As a principle, external visits should be limited as much as possible. Any personal presents are banned. Official in-kind donations must be agreed with CONCORDIA staff in advance and documented in writing.

6.6. Use of Information Technology

CONCORDIA regulates IT and online safety according to our values and legal requirements. We provide guidance to staff and volunteers as well as to children and youth to ensure appropriate and safe use of information technology, including social media.

Filters and blocking software are installed on all IT products to ensure that inappropriate/offensive sites, like those representing sexual behaviour or violent content, cannot be accessed via organisation's internet connection by both employees/volunteers and children. Any cases of filtering, illegal use, downloading or creating indecent images of children, cyberbullying, cyber grooming or use of information technology to abuse a child are forbidden. Such cases will be investigated and measures will be taken against the staff or the volunteers involved.

We recognise that the use of digital tools is very important for children's education and development and we support them with terminals and internet connection. At the same time, we have to safeguard children when they are online. For this reason, we regularly inform them about the risks of internet use, also in terms of what is legal or not, and require from them to report any inappropriate online communication.

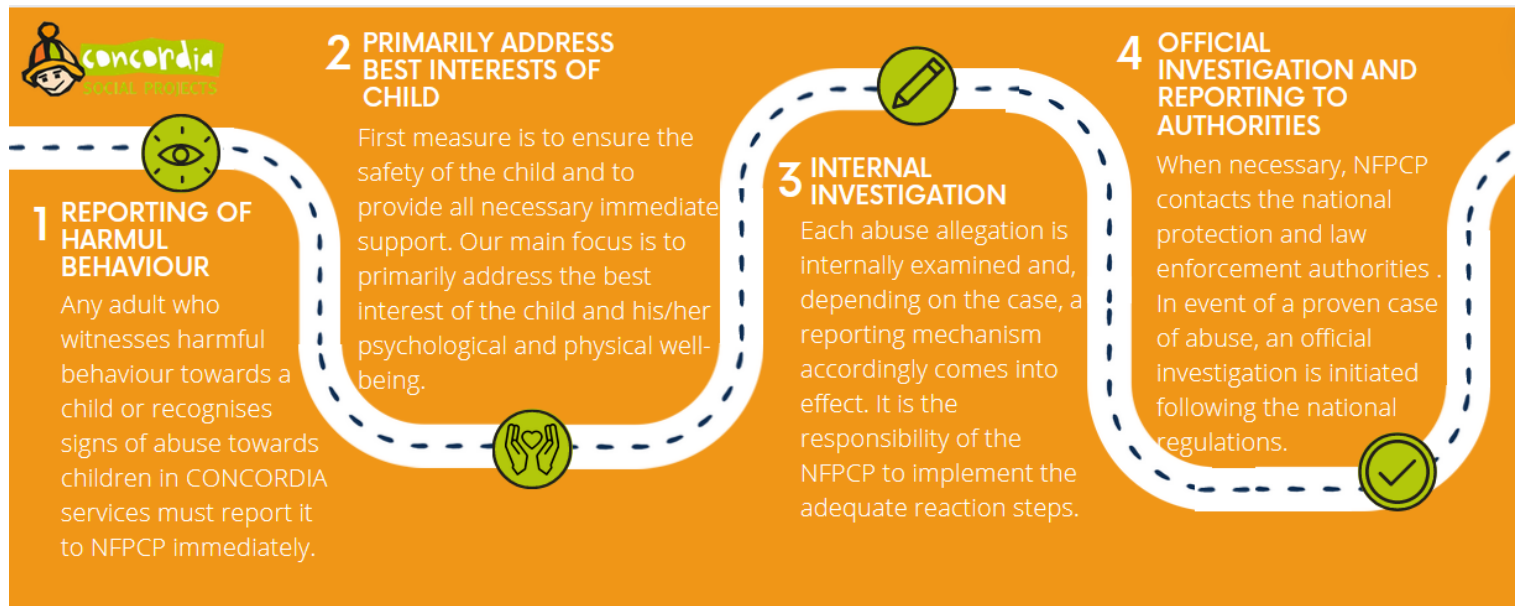
7. Responsive actions

7.1. Reporting and responding to child abuse allegations

CONCORDIA manages the child abuse allegations by primarily addressing the best interest of the child and his/her psychological and physical well-being. First measure is to ensure the safety of the child and to provide all necessary immediate support. Any adult who witnesses harmful behaviour towards a child or recognises signs of abuse towards children from our organisation must report it to NFPCP immediately. Each abuse allegation is thoroughly examined internally and, depending on the case, a reporting mechanism comes into effect accordingly. It is the responsibility of the NFPCP to correctly implement the adequate steps and, if necessary to contact the national protection and law enforcement authorities immediately. In case of an evident/proven case of abuse, an official investigation is initiated following the national regulations.

No retaliation or punitive action will be taken or are permitted to be taken against anyone who raises a child protection concern in good faith.

Flowchart of CONCORDIA Reporting Mechanism:



7.2. Accountability, Monitoring & Review of the observation of the Child Protection Policy

CONCORDIA is accountable towards the programme participants to whom it provides support through its various social and educational programmes. Thus, we constantly monitor and ensure that all children's rights in our services and projects are respected. We focus on preventing the violation of internal and external regulations and on preparing to intervene promptly in case of any (suspected or proven) child safeguarding issue according to our policy, national and international rules and legislation.

The national and international directors are responsible for upholding child protection principle within the organisation and for implementing the Child Protection Policy in their areas of organisational responsibility. Once a year the International Child Protection Officer presents an annual report to the International Board, which contains all child protection matters of all CONCORDIA national organisations, together with statistics on allegations of abuse, cases of children harm, types of abuse identified, number of confirmed allegations and measures taken to restore the child safety and well-being, as well as the type of sanctions put in place.

Self-assessment of the child protection policy measures implementation is conducted at the level of each project on an annual basis, following a template in line with the Keeping Children Safe standards. As a result, an annual national plan of actions is elaborated to address any gaps identified in the implementation of the policy and plan the strategies to mitigate the identified risks. The process for conducting the self-assessment and elaboration of the national annual plan is coordinated by the NFPCP. The plan is approved by the International Child Protection Officer and the Executive Director for Programmes and presented to the Board in the meeting on budget planning.

The Child Protection Policy will be reviewed every three to five years or when changes at the level of the (inter)national legal frameworks influence the provisions of the policy. The reviewed version is approved by the Board. The reviews consider lessons learnt and suggestions from children, staff, volunteers, stakeholders and partners involved in our activities with and for children. The review process is initiated by the International Child Protection Officer under the National Programme Directors and coordinated by the NFPCPs, and involves programmes, communication and fundraising staff from all national organisations.

8. Code of Conduct

CONCORDIA national organisations have a code of ethics in providing services for children as required by the law¹¹. Nevertheless, a complete Code of Conduct that reflects the Child Protection Policy has been developed to provide guidance for adequate and desired behaviours of employees towards children. Separate versions have been developed for volunteers, collaborators, visitors, as well as a child-friendly version for children. Moreover, CONCORDIA develops a set of guidelines to highlight the behaviour of children with other children, considering that children can also be prosecuted above a certain age depending on national legislation.

The scope of the Code of Conduct is to raise awareness among the staff members and all partners of CONCORDIA and to address the importance of the organisational values, internal regulations, standards, and principles outlining what we expect from our employees and supporters. Any person who violated the Child Protection Policy and the Code of Conduct is a subject to (disciplinary, if employee) enquiry. When necessary, the provisions of the labour and civil laws and the Rules of Interior such as sanctions or termination of the labour or service contracts will be applied. In case of severe child safeguarding allegations, we immediately inform the law enforcement authorities to take the respective legal measures according to the criminal law.

The Code of Conduct¹² is translated into all relevant working languages and printed in a written form. Each employee, member of the Board, volunteer and stakeholder must be made aware of it and sign it to commit to its content. The NFPCP will ensure the necessary support with understanding the contents of the document if it is necessary. The Code of Conduct is also intended to protect staff and other adults involved in the operations of the organisation and

¹¹ Fulfilment of quality standards for social services provided to children; Professional ethical codes for psychologists and social workers; Provisions of legislation regarding preventing and combating domestic violence (or any other types of violence against children).

¹² The most important expected or undesirable behaviours in regard to child protection aspects that is included in the Code of Conduct are listed in the Annex 2.

offer support if needed. The organisational Code of Conduct and its child-friendly version are published on the international and national CONCORDIA websites for visibility purposes.



**For us, children's rights are a stable foundation
and beacons in our daily work.**

Chairwoman of the Board, Ulla Konrad

Vienna, 2024

Statement of Commitment to CONCORDIA Child Protection Policy

I, _____, have read and understood the standards and guidelines outlined in this Child Protection Policy.

I agree with the principles contained therein and accept the importance of implementing and promoting the child protection policies and practices contained within this document in my quality of employee/ volunteer/collaborator/ board member/ partner/ service provider¹³ while working or associated with CONCORDIA.

_____ (Name)
_____ (Job title/role)
_____ (Signature)
_____ (Date)

¹³ Please circle the applicable option

ANNEX 1: Definitions and recognising signs of abuse

Types of abuse

Physical abuse is deliberately causing physical harm to a child by a person in a position of responsibility, power or trust. This might involve punching, hitting, kicking, biting, burning, scalding, shaking, throwing or beating with objects such as belts, whips, or sticks. It also includes poisoning, giving a child alcohol or illegal drugs, drowning or suffocation.

Psychological abuse includes both emotional and mental abuse. Emotional abuse impairs child's emotional development, while mental abuse impairs child's intellectual development.

Emotional abuse takes place when repeated verbal threats, criticism, ridicule, shouting and lack of love and affection cause a severe adverse effect on a child's emotional development. It includes conveying to children that they are worthless, unloved, inadequate or valued only as long as they meet the needs of another person. Emotional abuse may include not giving a child the opportunity to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature inappropriate expectations being imposed on a child, overprotection and limitation of exploration and learning, or preventing the child from taking part in normal social interactions. It may involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyberbullying), making children feel frightened or in danger frequently, or the exploitation and corruption of children. Certain level of emotional abuse is represented in all types of ill-treatment of children, or it may occur alone.

Mental abuse is a form of violence that affects the mind, often leaving the abused feeling worthless and powerless. Mental abuse determines difficulties in the acquisition of basic skills, specifically deficits in reading, languages and maths, affecting intelligence, memory, recognition, perception, attention, imagination, and moral development.

Sexual abuse involves forcing a child or young person, who is immature from the point of view of psycho-sexual development, to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact including both penetrative (i.e. rape) or non-penetrative acts (kissing, touching). They may include contactless activities, such as involving children in the production of child sexual abuse materials¹⁴ or in watching sexual activities or sexual materials, using language with sexual connotations, or encouraging children to behave in sexually inappropriate ways. The perpetrator could be an older or more knowledgeable child or adult (a stranger, sibling or person in a position of authority, such as a parent or caretaker). Sexual abuse is integral to early marriages or engagement of children involving sexual intercourse and sexual harassment in the case of children working according to the provisions of the labour/civil code. These contacts or interactions are carried out against the child using force, trickery, bribes, threats or pressure. Sexual abuse can be physical, verbal or emotional.

¹⁴ CONCORDIA does not use the term "Child Pornography" as the term can lead to confusion, misunderstanding, or even harm. Child sexual abuse material is a result of children being groomed, coerced, and exploited by their abusers, and is a form of child sexual abuse. But using the term "child pornography" implies it is a sub-category of legally acceptable pornography, rather than a form of child abuse and a crime.

Neglect is defined as the persistent failure to meet the child's basic physical and/or psychological needs which is likely to result in the serious impairment of child's physical or cognitive development. Neglect can take different forms:

- **Physical Neglect or Deprivation of Needs Neglect:** This type of neglect occurs when children's basic physical needs (e.g., food, shelter, and clothing) are not being met and often occurs in a persistent pattern. Examples of physical deprivation include being denied food and/or water and being left out in the elements;
- **Medical neglect:** When medical neglect occurs, children are denied the necessary medical care, such as omission of vaccinations and control visits, failure to apply treatments prescribed by a physician, failure to attend recovery programs. Failing to secure medical attention for an injured child or withholding care with the intent to cause death are both examples of medical neglect.
- **Supervisory neglect:** Supervisory neglect occurs when the adult responsible for a child either fails to supervise and keep the child from being harmed or fails to have someone else supervise the child and keep him or her from harm. This type of neglect can occur continually or only happen one time.
- **Environmental neglect or hygiene neglect:** This type of neglect is related to both physical neglect and supervisory neglect, but it occurs when children's home environments are filthy. Rotting food may be left out, there may be infestations of rats or cockroaches, and children may regularly come to school in dirty clothing. Some professionals group environmental neglect with physical neglect.
- **Educational neglect:** Educational neglect is when children are not given access to education. Examples of educational neglect include parents failing to register children for school or parents making children stay home from school to ensure that they don't report the abuse they experience at home.
- **Emotional neglect:** Emotional neglect occurs when children are deprived of their emotional needs: lack of attention, physical contact, signs of affection, words of appreciation. A few examples of emotional neglect include humiliating a child, rejecting a child, or giving bizarre forms of punishment.

Leaving/abandoning the child is the most serious form of neglect¹⁵.

Bullying¹⁶ is the use of force, threat, or coercion to abuse, intimidate, or aggressively dominate others, usually repeated over a period of time. One essential prerequisite is the perception of an imbalance of social or physical power by the bully or by others. Bullying is divided into four basic types of abuse: emotional- (isolating an individual from the activities and social acceptance of their peer group), verbal- (racist or homophobic remarks, threats, name-calling), physical-, and cyberbullying. If bullying is performed by a group, it is called mobbing.

Cyberbullying¹⁷ is a form of bullying or harassment is defined as intentional and repeated harm inflicted through the use of computers, phones, and other electronic devices. Cyberbullying behaviour can include posting rumours about a person, threats, sexual remarks, disclosing victims' personal information or pejorative labels (i.e., hate speech). Persons, who

¹⁵ "Child abuse and neglect" – Sociological study at national level; Save the Children Romania and the Ministry of Labor, Family, Social Protection and Elderly Romania, 2013

¹⁶ Wikipedia: <https://en.wikipedia.org/wiki/Bullying>

¹⁷ Wikipedia: <https://en.wikipedia.org/wiki/Cyberbullying>

experience it may have lower self-esteem, increased suicidal ideation and various emotional responses such as retaliating, being scared, frustrated, angry and depressed.

Cyber Grooming is the process of “befriending” a young person online “to facilitate online sexual contact and/or a physical meeting with them with the goal of committing sexual abuse”.¹⁸ The main goals of cyber grooming are to gain trust of the child and to obtain their intimate and personal data (often sexual in nature, such as sexual conversations, pictures, or videos) with the aim of threatening and blackmailing for further inappropriate material.

Electronic violence is when someone uses data or information and communications technology (ICT) to cause mental, emotional, or psychological distress to someone. This includes recording or distributing private images or videos of a child and uploading or sharing media content of a child that has vulgar, indecent, obscene or sexual content. It also includes online harassment, cyber-stalking, hacking someone else’s online accounts, using someone else’s identity or tracking someone’s electronic devices, as well as misrepresenting oneself to make someone else look bad or hurt their reputation.

Economic exploitation of a child is the use of the child in work or other activities for the benefit of others. This includes but not limited to child labour. Economic exploitation implies the idea of a certain gain or profit through the production, distribution and consumption of goods and services. This material interest has an impact on the economy of a certain unit, be it the State, the community or the family. Examples: child domestic work, child soldiers and the recruitment and involvement of children in armed conflict, child bondage, the use of children in criminal activities including the sale and distribution of drugs, and the involvement of children in any harmful or hazardous work.

Commercial sexual exploitation of children¹⁹ is sexual abuse of a child by an adult followed by remuneration in cash or kind to the child or a third person. The child is treated as a sexual and commercial object. The commercial sexual exploitation of children constitutes a form of coercion and violence against children, and represents forced labour and contemporary form of slavery.

Child sexual abuse material²⁰ means representation of a child engaged in real or explicit simulated sexual activities in images or videos or any representation of the sexual parts of a child for primarily sexual purposes.

Child abduction²¹ is the unauthorised removal of a child from the custody of the child’s natural parents or legally appointed guardians. The term *child abduction* conflates two legal and social categories which differ by their perpetrating contexts: abduction by members of the child’s family (i.e. removal of the child from the custody parent in case of divorce) or kidnapping by strangers (i.e. extortion; illegal adoption of the child after they were illegally removed from custody; human trafficking - when a stranger abducts a child with the intent to exploit the child themselves or to trade them in slavery, forced labour, sexual abuse, or even illegal organ trading; murder).

¹⁸ Child Safe Net: <https://www.childsafenet.org/new-page-15>

¹⁹ Questions and Answers about the Commercial Sexual Exploitation of Children, ECPAT International, 2001

²⁰ Optional protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child sexual abuse materials, United Nations, 2000

²¹ According to National Centre for Missing & Exploited Children

Risky migration - For children who migrate to escape difficult living situations, violence or conflict, migration can constitute an opportunity to reduce risks. Others encounter more severe risks during migration or at the place of destination. Some groups of children are vulnerable to exploitation and abuse, including trafficking, because of weak social safety nets. The risks a child is exposed to are often closely intertwined and are considered cumulative. A child who is already living in a vulnerable situation, such as poverty, abuse or school drop-out, is considered even more vulnerable when additional risks come in, such as exploitative relationships or risky migration²². Many children on the move are exposed to harm during the journey and at their final destination. Children face violence, exploitation and abuse at the hands of people they encounter in transit and at destination, including employers, transporters, smugglers and traffickers. They might experience significant levels of indifference or abuse by state officials, including police, border guards, immigration officials and staff in reception or detention facilities. Some of the children on the move lose their lives on the journey from dehydration, malnourishment, suffocation or transportation accidents or drown at sea. Unsafe migration conditions create risks for children. In addition to experiencing acts of violence, children risk coming into conflict with the law if they travel without the required documents, if they engage in illegal or criminal activities to make a living, or if they are persuaded or forced by others to do so. In situations of habitual mobility or circular migration, such conditions can significantly influence the well-being, safety and development of the child. As CONCORDIA works daily with children, youth and families with migrant background, we have developed a **CONCORDIA Child Safeguarding in Emergencies**²³ to ensure their safety.

The following **signs** may or may not be indicators that abuse has taken place, but the possibility should be considered and assessed with care.

Signs of possible physical abuse

- Any injuries not consistent with the explanation given for them,
- Injuries which occur on the body in places which are not normally exposed to falls or rough games,
- Injuries which have not received medical attention,
- Reluctance to change for, or participate in games or swimming,
- Bruises, bites, burns and fractures, cuts, dislocations, which do not have an accidental explanation,
- Frozen watchfulness,
- Fear of returning home or of parents being contacted,
- Self-destructive tendencies,
- Being aggressive towards others or being too absent, avoiding contact with others.

Signs of possible sexual abuse

- The child has excessive sexualised behaviour or language, or regularly engages in sexual play inadequate for their age,

²²United Nations High Commissioner for Refugees, Conclusions on Children at Risk, Executive Committee Conclusions, no. 107 (LVIII), 2007

²³ CONCORDIA Child Safeguarding in Emergencies:

https://www.concordia.or.at/fileadmin/user_upload/DACH/Files/CONCORDIA-ChildProtectioninEmergencies.pdf

- Sexual activity through words, play or drawing,
- Repeated urinary infections or unexplained stomach pains,
- The child is sexually provocative or seductive with adults,
- Inappropriate bed-sharing arrangements at home,
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations,
- Eating disorders such as anorexia or bulimia,
- Fear of being with adults.

Signs of possible emotional abuse

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour,
- Obsessions or phobias,
- Sudden underachievement or lack of concentration,
- Seeking adult attention and not integrating well in the community of other children,
- Sleep or speech disorders,
- Negative statements about oneself,
- Highly aggressive or cruel behaviour towards others,
- Extreme shyness or passivity,
- Drug or alcohol abuse,
- Running away, stealing and lying.

Signs of possible neglect

- Dirty skin, body smells, unwashed, uncombed hair and untreated lice,
- Clothing that is dirty, too big or small, or inappropriate for weather conditions,
- Frequently left unsupervised or alone,
- Frequent diarrhoea,
- Frequent tiredness,
- Untreated illnesses, infected cuts or physical complaints which the carer does not treat,
- Frequently hungry, stealing food,
- Frequent lateness or non-attendance at school,
- Low self-esteem,
- Poor social relationships.

ANNEX 2: Code of Conduct

DO'S:

- Be informed about what constitutes violence against children and of the provisions of the Child Protection Policy and apply these provisions in your work or interaction with children;
- Immediately report any suspicious case of abuse to the NFPCP;
- Treat all children equally and without discrimination;
- Maintain high standards of personal and professional conduct;
- Be aware of the higher risk of abuse in certain situations (i.e. unsupervised group of older and younger children) and do everything possible to eliminate such situations;
- As a caregiver, observe and listen to the child to help them. The child's best interest and well-being should always prevail in your work;
- As a co-worker, empower children, discuss with them their rights, what is acceptable and unacceptable, what they should do to avoid risky situations and what they can do if there is a problem.
- Respect the confidentiality of children's personal information and their image and dignity;
- Be aware of CONCORDIA media and communication guidelines and the use of informational technology to protect children;
- Be aware of CONCORDIA Child Safeguarding documents;
- Be a good example for children, partners and colleagues.

DON'TS:

- Do not conduct investigations yourself or question the child;
- Do not any kind of harm to the children and prevent risky situations;
- Never have a CONCORDIA child stay overnight in adult's room or sleep in the same bed;
- Do not discriminate, shame, or humiliate children, including use of language that mentally or emotionally abuses a child;
- Do not stay alone with a child in different activities that might be questionable by others;
- If you have individual activity with a single child, do not close the door;
- Do not kiss, hug, fondle, rub, or touch a child in an inappropriate and undesirable way;
- Do not cover any inappropriate behaviour towards a child you notice to any colleague, volunteer or other collaborator with the organisation;
- Do not take pictures or record videos with a child without being required by the organisation and without having the written consent of the caregiver;
- Do not do things for children that they can do themselves, like clothing or bathing;
- Do not engage in friendship on personal social media channels (e.g. Facebook); if the connection is considered necessary and, the employees' social media accounts become professional accounts, no personal information and pictures are to be posted;
- Do not engage in one-to-one communication with children or via text messages, instant messaging or chat facilities, unless it relates specifically to your job responsibilities.