



## **Child Protection Policy**

## OF THE ASSOCIATION "CENTRE FOR EDUCATIONAL INITIATIVES"

The Association "Centre for Educational Initiatives" strives to protect children from abuse and exploitation in all its activities and projects.

/According to Article 19 of the UN Convention on the Rights of the Child/

Approved by:
Tzvetan Tzvetanski
/Chairman of the Board/





#### INTRODUCTION

This policy outlines the minimum common standards for child protection.

The Centre for Educational Initiatives puts in place appropriate procedures that are in line with the minimum standards. Violation of the standards will entitle the Center to take further action.

This policy has been approved and signed by the Chair of the Centre for Educational Initiatives and reflects the organisation's position on child protection.

Responsibility for the implementation of the Child Protection Policy rests with the Project Coordinators and Team Leaders.

The Centre for Educational Initiatives believes that all forms of child abuse/violence and exploitation are unacceptable. The organisation believes that measures should be taken to protect families from people who would seek to gain their trust and provide access to children through the activities of the organisation.

The Centre for Educational Initiatives accepts that there is a possibility that its employees or partners may, for unclear reasons, commit acts of abuse/violence against children involved in our activities and programmes and is committed to developing and improving procedures and mechanisms to prevent these.

The protection and well-being of children is the commitment of the organization as well as each of its employees or volunteers personally. All employees and volunteers of the organization will be made aware of the Child Protection Policy and the need to integrate it into all activities of the organization. Relationships with anyone found to be carrying on a relationship involving violence, abuse and exploitation of children will be terminated immediately.

#### REGULATORY FRAMEWORK

The Child Protection Policy of the Centre for Educational Initiatives is based on the principles of the UN Convention on the Rights of the Child. The UNCRC provides the overall protection framework for all children.

The following articles of the UNCRC form the normative framework for child protection in the organization: art. 1 - definition of child; art. 2 - non-discrimination; art. 3. (1.) - best interests of the child, art. 3. (2) - duties of care and protection, art. 12 - participation, art. 13 - freedom of expression, art. 19 - protection from violence, Art. 32, Art. 33, Art. 34, Art. 36, Art. 37 (a) - protection from economic exploitation, use of psychoactive substances, sexual abuse and all other forms of exploitation; torture, cruel, inhuman or degrading treatment or punishment.

София 1000, ул. Иван Вазов 24-26

**Контакти**: Имейл - <u>office@cei-bg.org</u>; Уеб сайт - <u>http://cei-bg.org/</u>

Sofia 1000, 24-26 Ivan Vazov Str.





The Child Protection Policy of the Centre for Educational Initiatives Association is drafted and implemented in accordance with the national legislation of the Republic of Bulgaria and in particular with the Persons and Family Act (PFA) Article 2, Article 3, Article 4 and the Child Protection Act (CPA), in particular Article 3, Article 7, Article 11, Article 11a and Article 12 and the regulations for its implementation.

#### **DEFINITIONS AND TERMS**

Intra-organisational child protection is a system of responsibilities that a CBO establishes to ensure that the organisation's members, staff and volunteers, through their activities, services, projects and programmes, do not harm children, do not put them at risk of abuse, and that any concerns about the safety of children in the communities where they work are raised and reported to the relevant services.

For the purposes of this Policy, and in line with the mission and objectives of the organisation,

the following definitions of harm and abuse are introduced:

- A child is any person under the age of 18 years.
- Minor: any child under the age of 14.
- Minor: Persons between the ages of 14 and 18 are persons of limited capacity.

**Physical Abuse**: Actual or potential physical abuse caused by another person-child or adult. May include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or any other physical injury to a child, including tampering with symptoms or intentionally impairing the child's health.

**Sexual Abuse**: Includes forcing or enticing a child to engage in sexual acts, whether or not the child is aware of what is occurring. These acts may involve physical contact, including penetrative or non-penetrative acts. It may also include the involvement of children in the viewing or production of pornographic material, or encouraging them to behave inappropriately.

Child sexual exploitation: A form of sexual abuse that involves children being involved in sexual activities in exchange for money, gifts, food, shelter, affection, status quo, or anything else that the children or their families need. This form of abuse may involve manipulating children, befriending them, gaining their trust and securing access to alcohol and drugs. This type of abusive relationship between victim and perpetrator is based on an imbalance of power, with the victim's options being severely limited. This form of abuse can be misunderstood by children and adults as a relationship based on mutual consent.

Child sexual exploitation manifests itself in different ways. It may involve an adult perpetrator exercising financial, emotional or physical control over a minor. It can also involve peers manipulating or coercing the victim into sexual activity, sometimes within a gang or neighbourhood. This form may also manifest itself

София 1000, ул. Иван Вазов 24-26

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through an organized network of perpetrators who receive financial benefits from trafficking children to different locations to engage in sexual activities with large numbers of people.

**Neglect**: Depending on the context, resources and circumstances, neglect and neglectful treatment can be defined as a persistent failure to meet a child's basic physical/psychological needs that can escalate into a serious impairment in a child's health or development, such as not providing sufficient food, shelter and clothing or neglecting and being irresponsible to a child's basic emotional needs. Neglect can consist of maternal disinterest during pregnancy, alcohol and drug use, and insufficient care for a child with disabilities.

**Passive neglect**: This is an attitude on the part of professionals not to expect achievement, development and fulfilment from certain children, to be inactive with regard to meeting their specific needs.

**Emotional Abuse**: Constant emotional maltreatment that affects the child's emotional development. Actions associated with emotional abuse may include exclusion, humiliation, indulgence, bullying (including cyberbullying), intimidation, intimidation, discrimination, ridicule and other forms of treatment based on rejection or hostility. Emotional violence and abuse is also the manipulation, alienation of a child from a parent(s), both by a parent and by alternative care structures, support structures and services.

Harm: Some interventions that have generally helpful aims can cause harm in a particular child if they are not thought through, tailored to the individual and context of the case, if a risk assessment is not carried out when they are implemented. Sometimes doing nothing is better than intervening, at the risk of leading to harmful consequences for the child. The 'do no harm' principle, refers to the responsibility of helping professionals to 'do no harm', or to reduce the harm that may unintentionally result from inappropriately described or implemented activities of projects, programmes, services.

**Secondary victimisation**: causing additional suffering to the child by the way in which institutions responsible for reporting, investigating and administering justice in the name of justice traumatise the child with inadequate treatment, maladapted legal procedures, absence of a holistic approach.

Good treatment: is a neologism that denotes attitudes and interventions that are the opposite of maltreatment and that go beyond the absence of maltreatment. It essentially describes a system of quality standards in the care and education of children by their parents, relatives, surrogates; the care, education, social support and accompaniment of children and adults in universal, social and restorative services, activities and practices. It implies respect, consideration, interventions aimed, at meeting the individual needs of the person, respecting clear professional boundaries, limits, law.

**Behavioral etiquette** is a set of rules for appropriate and proper behavior that are developed to ensure the protection of children, but are also designed to protect adults from false accusations of inappropriate

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behavior or abuse/violence. This etiquette applies to employees, volunteers, board members, contractors, sponsors, and all visitors/guests to the services and projects operated by the organization.

#### POLICY OBJECTIVES AND TARGETS

This Policy considers children as objects of protection and as rights holders. In this sense, the Policy aims to protect children from abuse, violence and exploitation, but also in a broader sense - to ensure respect for their rights in general.

To achieve this goal, the Policy sets out the following objectives for the protection of children, employees, and the organization as a functional unit:

#### In the area of child protection:

- The development and implementation of clear and enforceable child protection rules and measures;
- minimising the potential risks of abuse and exploitation of the children with whom the organisation works.

#### In relation to the organisation's employees:

- The policy clearly outlines the conduct of the organisation's employees and acceptable boundaries in communication when working with children;
- Helps staff to identify potential risks in

working with children;

- Outlines possible ways in which staff can act in cases of of suspected or proven risk of violence or abuse.

#### In terms of organisation:

- The implementation of the Child Protection Policy sets clear boundaries for the organisation's involvement in contacting and working with children.
- The policy is a prerequisite for improving approaches to staff selection training and qualification of working professionals and paraprofessionals.
- It outlines the standards in the use of external consultants and entering into partnership relationships related to work with children with other organisations and structures;





- Reduces the risk of false or malicious accusations of child abuse which can destroy an organisation's reputation and goodwill.

#### **SCOPE**

This Child Protection Policy applies to all employees and partners of the Centre for Educational Initiatives.

#### For the purposes of the Policy, the term "employee" is defined as:

- All employees employed on a permanent, temporary or civil contract basis;
- All consultants or experts employed under a civil contract;
- All interns or volunteers of the organization.

#### For the purposes of the Policy, "partners" is defined as:

- All external supervisors and consultants;
- All donor and donor partner organizations;
- International Partners;
- Media and their representatives;
- Visitors and guests.

All staff, trainees and volunteers working in the office and centres of the Centre must be familiar with this document and declare this by signature. In carrying out their duties, staff, interns and volunteers should endeavour to adapt policies and procedures to suit their work.

The Child Protection Policy shall be introduced as a mandatory element of training for newly recruited trainee staff and volunteers.

In the implementation of joint activities and projects, the organisation's partners will be introduced to the child protection policy. Future partnership agreements will include this policy as part of them, or will ensure compliance with it by signing a dedicated declaration.

The Centre for Educational Initiatives will encourage its partners to develop their own child protection policies and procedures.





#### **GUIDING PRINCIPLES FOR POLICY IMPLEMENTATION**

The Centre for Educational Initiatives is guided by certain values and principles which the organisation observes in its overall work:

- Children's rights are a core value children's health, safety, welfare and best interests are placed above the interests of adults, organisations or other stakeholders.
- Non-discrimination. The Center works with children, their families and communities regardless of their ethnicity, race, faith, gender, beliefs, sexual orientation or other differences that may be the basis for discrimination.
- Child Participation. We believe that children should be encouraged and supported to participate in decision-making and policy-making that affects them, and we will promote this right in all our actions.
- Investing in children, their development and well-being will support the fulfilment of their potential, their independence and lead to prosperity for the whole nation. This is why we work with a vision to have a broader impact on children's well-being and ensure children's rights.
- Openness and transparency in the decision-making process of the organization and in all actions we take.

### RULES OF PROTECTION AND BEHAVIOURAL ETIQUETTE:

- 1. Employees and employees of the organization, as well as visitors/guests should report to work in appropriate, proper attire.
- 2. Employees of the Center and visitors/guests should not be left alone for long periods of time or overnight with one or more children or minors, either in employee housing or service delivery areas or elsewhere.
- 3. Minors shall not be engaged to perform personal work or as "domestic helpers" by employees of the Center.,
- 4. The employees of the Centre shall not be allowed to shelter minors in their homes.
- 5. Employees shall not lend, in exchange for, or without compensation, money, goods, or personal services to children with whom they work.
- 6. Employees of the organization shall not accept personal gifts, money, goods or services from children or their parents or relatives.





- 7. Center employees and visitors/guests are not permitted to fondle, hold hands, kiss, hug or touch minors in a manner that is inappropriate or unacceptable. In order to avoid misunderstandings, it is recommended that permission be sought from the child prior to hand holding.
- 8. Whenever possible and practicable, the "two adult presence" rule should be followed where two or more adults supervise all activities involving minors or children. If this is not possible, the organisation's staff have the right to seek alternatives, such as the presence of community members during visits to the children's placement (this rule excludes individual consultations with a specialist).
- 9. Staff should be mindful of the fact that they may need to work with children who, because of the circumstances and abuse they have experienced, may use the relationship to receive "special consideration." The adult is always considered responsible, even when the child has seductive behaviour. Adults should avoid putting themselves in a compromising or vulnerable position.
- 10. Centre staff shall treat all children with whom they work or have contact in the course of their duties equally and impartially.
- 11. Inappropriate behaviour towards children is grounds for disciplinary action.
- 12. Staff must be sensitive to the way they are perceived and appear in terms of the language used, actions and relationships with minors and children.

## **USE OF IMAGES AND VIDEOS**

It is a principle of the Center for Educational Initiatives, when using visual images, both photographic images and video, to adhere to respectful and dignified representation of children, families and communities. The Centre's Imagery Policy is part of the Child Protection Policy.

When using visual images, the organisation adheres to the following principles:

- 1. Respects the dignity of the subject.
- Images of children are only taken and used when there is permission (signed statement) from a parent/legal guardian.
- Permission is sought to take photographs or video material on a case-by-case basis and is clearly described in the declaration of permission for what purposes the images will be used. Consent to take and use photographs is sought from the children's parents and those with parental responsibility, or directly from the children/young people where they are of the appropriate age. (applies to children aged 14 years and over under section 11(3) of the DPA).

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- Special attention will be paid to photographs showing children with disabilities, children living in extreme poverty or inadequate conditions, refugee children and children in situations of conflict and disaster, in order to accurately represent the context while preserving the dignity of the persons concerned.
- Persons who state that they do not wish to be filmed shall never be filmed.
- 2. Not exploiting the subject.
- The subject is not exploited in a way that distorts the real picture of the situation.
- If necessary to maintain confidentiality, the names of children and families will be changed. The child's full name and contact details are not published under any circumstances.
- 3. Fair use of images.
- Case histories/descriptions are not specifically prepared, although they may be adapted or edited to preserve personal dignity or confidentiality.
- No image of one thing is used to describe another.
- Do not use an image in a way that intentionally misleads about the actual situation.
- We strive to take every measure to make sure that the subject would perceive the image and its manner of use as truthfully as possible, looking at it through their own eyes.
- 4. We maintain standards of good taste and decency that are consistent with our values and the values of our supporters.
- We do not use images that are erotic, pornographic or obscene.
- We do not use images of dead or naked bodies.
- We do not gratuitously use images of extreme suffering.
- 5. We respect the views of our employees and contributors in the communities in which we work.
- We treat with sensitivity and take into account the concerns and recommendations of our employees and collaborators when collecting and using material with visual images.
- 6. When filming children with whom the Center works and for whom permission is granted, media/photographers who conduct the filming sign a statement agreeing to use the video/image truthfully and only for the specific case.





#### COMMUNICATION IN RELATION TO CHILDREN

- 1. When communicating with children, language that speaks of power-based relationships should be avoided.
- 2. When communicating in relation to children, pictures should be used that are respectful, deferential and do not portray children as victims. Children should be dressed appropriately and postures that could be perceived as arousing sexual associations should be avoided. Language that refers to power-based relationships should also be avoided. However, we also acknowledge that in some cases in reality children could be victims of, for example, poverty. In these cases, the dignity of the child should also be preserved, while reality is presented in an appropriate manner.
- 3. Scanned images of children should not be used on web pages or other information material without the official permission of the organisation and the child's parent(s)/guardian(s). This permission should be given in writing.
- 4. The personal data and physiological features of the child that could be used to locate the child in the country should not be published on the organisation's web pages or in any other form of communication with the child.
- 5. Individuals or organisations approaching the Centre to request the use of its resources, such as videos or photographs, should be required to sign a contract governing the lawful use of such material. The agreement will contain notice that any use of such materials for purposes other than those governed by the agreement may result in legal action being taken against the person or organization borrowing the materials. In addition, failure to comply with the requirements relating to the use of the materials will result in the immediate withdrawal of the organization's permission to use the materials in question and/or require the immediate return of all materials provided by the organization, as well as all copies thereof.
- 6. In cases where the organisation's partners film children of the organisation's clients in the course of carrying out joint activities, it is necessary for the partner to seek explicit consent from the child's parent/guardian detailing the purpose of the filming and the locations where the filmed material will be published/displayed. The partner must be made aware of the organisation's Child Protection Policy and the rules on the use of images and communication in relation to children.
- 7. The Partner undertakes to use the images only for the declared purposes and not to make them available to third parties.
- 8. The Center for Educational Initiatives uses social media, and only employees of the organization with administrative rights are allowed to upload information, images and/or videos involving children.

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9. No contact with persons under the age of 13 is allowed on the organization's social media. A significant number of social media sites require children who sign up to be over the age of 13. Use of social networking sites by children under this age violates the rules.

Failure to comply with these rules carries with it administrative and, in the case of persistent misconduct, disciplinary sanctions.

# RULES FOR PERSONAL USE OF SOCIAL NETWORKS BY EMPLOYEES AND PARTNERS

- 1. Communication shall only be made from an organisation profile or relevant organisation structure.
- 2. The use of personal profiles of employees is not allowed in communication with children.
- 3. First person is always used.
- 4. Uploading or posting material that may be perceived as demeaning, obscene, offensive or hurtful to children is not permitted.
- 5. The Child Protection Officer (CPO) in the organisation must be informed in a timely manner if a member of staff is found to be uploading inappropriate child-related content to social media.
- 6. Sensitive information, such as names and locations of children with whom the organisation works, must not be shared.
- 7. Each employee is personally responsible for the content they share, so advance consideration should always be given to what information is shared on social media.
- 8. The organisation's activity on social media is the responsibility of employees with administrative rights.
- 9. If children are to be communicated with on social networks, children are added to the employee's personal contact list, but their access is limited to work information only.

On Facebook this is done through:

- a. adding them to a "Restricted" list that only receives public information that the employee has explicitly shared as available to all Facebook users (Public).
- b. Editing Privacy settings so that personal information (such as friends list, work location, residence, etc.) is only available to users on the employee's contact list.

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#### PARTNER ORGANISATIONS

Any arrangement between the organisation and its other partner organisations that provide services to children will require assurances that they have child protection policies and procedures in place, recognising that the absence of such policies may put children and the organisation at risk.

Any arrangement between the organisation and other partner organisations in relation to the implementation of joint projects and activities will require, as part of the contract/agreement, that the partner organisation is made aware of and signs an undertaking to follow the child protection policy.

Where the organisation enters into partnership relationships with other organisations or specific people external to the organisation that do not require a contract or agreement, the partner will sign a declaration that they are aware of and will comply with the organisation's Child Protection Policy and accompanying procedures