



CHILD PROTECTION POLICY

“Whoever saves one life saves the whole world!”

Approved by the International Board of CONCORDIA Social Projects Charity Foundation

in Vienna,

on 22nd of March 2018

The text of the policy was written and compiled by Ms Mirela Lavric, under the responsibility of the Programmes and Projects Department of CONCORDIA Social Projects Charity Foundation, with support from the International Management Team. We express our thanks and gratitude to children, parents, volunteers, colleagues and partners from all CONCORDIA countries who acted as internal consultants and who contributed with feedback, views and recommendations for this policy paper.

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Foreword from the Board

With the child protection policy presented here, the CONCORDIA Social Projects 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 violence and to implement, review and further develop the best possible overall measures in the organization.

This policy, which is addressed to all employees, supporters and competent authorities, outline what definitions we have for violence, which preventive steps are taken to prevent violence in the organization, as well as which specific directions for action we demand so that children can experience a good, happy and self-determined childhood and youth in CONCORDIA facilities.

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

We proudly consider that many child protection measures have been the norm in the organization for years. This child protection policy officially and clearly states them for the first time. Furthermore, during the development of this document we could discuss and reaffirm the importance of the topic for the organization. In this process, the children, adolescents and families we care for, as well as employees of the various areas within the organization, spoke extensively in conducted interviews.

This policy moreover seeks to address the changing circumstances that children are currently experiencing in their environment, whether it be new legislation such as the General Data Protection Regulation or the reality of social media, which pose a major challenge not only in the daily work with children, but also in the communication with supporters, and necessitate a careful re-examination and partial reorientation.

Not least, the policy includes a specific code of conduct and a catalog of measures, as in the case of any suspicion of violence whatsoever against children where concrete steps are to be taken.

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,

Executive Chairperson of the Board

1. Introduction

Violence against children is an international phenomenon¹ and it happens in different settings or societies. Children of all ages are at risk experiences or witnesses violent discipline, domestic abuse, bullying in school, sexual or economical violence. These can occur at home, in schools, care settings, on the streets, in camps and trips. Perpetrators could be the parents or other family members, foster parents or other care givers, teachers, medical staff, or other children. Some children are particularly vulnerable because of gender, race, ethnic origin, disability, sexual orientation, religious beliefs or social status. Most of the time, violence against children can be prevented.

1.1. About Humanitarian Organization CONCORDIA – Social Projects

Humanitarian Organization CONCORDIA Social Projects (further called CONCORDIA) is a non-governmental and non-profit organization present in Austria, Bulgaria, Kosovo, Romania, Republic of Moldova, Germany and Switzerland, where national organizations are running social and educational services in the benefit of children, young people, their families and communities. Day care centres and outreach community work services are organised to prevent child separation from their families. Family-like care services are provided for those children and young people who, due to various psychosocial reasons, are separated from their families. Vocational centres, centres for development of life skills, transitional and supervised apartments are services for teenagers and young people focused on the educational component.

Mission

CONCORDIA is an international, independent aid organization dedicated to helping children, adolescents and families in need.

CONCORDIA helps quickly and directly on site. We go where the need is greatest. CONCORDIA enables children to enjoy a happy and healthy childhood. We focus on building stable ties and strengthening families.

CONCORDIA accompanies children and adolescents on their journey towards a self-determined life. We open chances through education and vocational training.

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.

Vision

Children and young people get to live a self-determined life, out of marginalisation!

We go where the need is the greatest. And where others do not go.

We seek individual solutions for children, adolescents and their families. And we never give up on anyone.

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



We orient ourselves towards a humanistic vision and Christian values. And we are open for other cultures and religions.

We search for new ways. And we act sustainably and responsibly.

We work professionally. And we use our heart and brain.

We build upon competent co-workers, volunteers and friends. And we hope for large-heartedness.

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)**. All CONCORDIA organizations stand for and share the common commitment to protect the children from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse². CONCORDIA's work is meant to protect all children's rights as stipulated in the UNCRC, as well as in the national legislation regarding promoting and respecting children's rights of the countries in which develops services. In all actions with and for children CONCORDIA is committed to safeguard children and to report and respond to any alleged abuse, taking all the measures as stipulated in the internal national policies and procedures, no matter the source of the referral and the alleged perpetrator.

By developing and implementing the Child Protection Policy, CONCORDIA states and undertakes all measures that any form of violence against children is unacceptable!

1.3. How the policy has been developed

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

2. Principles underpinning our Child Protection Policy

Child safeguarding is the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children, that is that they do not expose children to the risk of harm

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

and abuse, and that any concerns the organisation has about 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 their best interest and well-being considered and have equal rights to protection from any form of violence;
- All children and young people know about their rights and responsibilities;
- All children and young people ' voices are heard and their opinions are paramount for the decisions which affect them;
- We value and respect all children in the context of their own culture, religion and ethnicity;
- We do our work for children based on partnerships with authorities, schools, kindergartens and other NGOs in a trustful and transparent manner, therefore we expect a *do not harm to children* approach from all these partners.

3. The goals of the Child Protection Policy

CONCORDIA works with vulnerable children and young people and in all activities and decisions taken, the best interest of the child is the main point of reference. The services it provides for children in the national organizations are recognised according with national legal provisions and these are **services with residential** component for children who, for longer or shorter period of time, cannot live with their parents or relatives and **during the day services** to support families in need and prevent child's separation.

The goals of the policy are:

- *To have trained and informed staff and volunteers regarding ethical behaviour towards children, to prevent children's rights violation, to be able to identify any signs of abuse on children and report them;*
- *To have all the individuals which are collaborating with CONCORDIA in their quality of Board members, consultants, contractors, partners, sponsors and donors, guests and visitors, journalists, animators or accompanying persons in the activities they are conducting with and for children, whether is about events, meetings, projects, fundraising activities, visits, leisure activities, trips and camps respecting children's rights and ensuring a safe and trustful space for them;*

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

- *To have the children informed on their rights and on the adequate behaviour of the others, adults or peers, towards them and have them respectful towards staff, volunteers and peers;*
- *To have a good reputation as an organization, due to its commitment to tackle child abuse, as a guarantee for donors, partners and general public for quality, effectiveness and accountability of its work.*

The Child Protection Policy is complementary with all policies and procedures in our organization.

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 legislations on children's rights from Austria, Romania, Republic of Moldova and Bulgaria.

5. Definitions

The „**child**” definition in the Child Protection Policy is the one contained in article 1 of the UN Convention on the Rights of the Child: “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 is applicable to young people beyond 18 years old who are still benefiting by a placement measure according to the national legislation regarding the promotion and protection of children rights.

„**Violence against children**” definition is in the article 19 of the UNCRC: “all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse.” The definition in the World Report on Violence and Health (2002) is: “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.” In our policy we understand through **violence against children** all forms of physical and psychological (mental and emotional) harm of children, sexual abuse, neglect, bullying, economic exploitation / exploitation through labour, sexual exploitation, abduction and / or disappearance, risky migration, trafficking, internet violence, child pornography, that could happen in: family, school, health system, child specialised protection system (foster care, family type homes, placement centres), other services like day-care, community

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.

centres and after-school, over the Internet, 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 violence, perpetrated by children against children. Additionally, it includes children witnessing violence within all the media listed above. **Violent discipline at home (in the family or alternative forms of care) is the most common form of violence** experienced by children. While educating children, many caregivers rely on the use of violent methods, both physical and psychological, to punish unwanted behaviours and encourage desired ones. Caregivers do not necessarily use this type of discipline with the deliberate intention of causing harm or injury to the child. Rather, it sometimes stems from anger and frustration, lack of understanding of the harm it can cause, or limited familiarity with non-violent methods.

Child protection is the protection of children from violence, exploitation, abuse and neglect as stipulated in article 19 of the UN CRC that 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 organization and its employees, collaborators and volunteers to protect children in their care from both intentional and unintentional harm.

A similar term is **Child safeguarding**, especially used in the United Kingdom and Ireland to denote measures to protect children to live free from abuse, harm and neglect.

6. Preventive actions

CONCORDIA is committed to create a safe environment for children, to achieve their wellbeing and their best interest. Awareness and prevention of risks will be part of our usual work in all our activities, at all levels. This policy together with its procedures for implementation will be powerfully implemented among staff, partners and children, thus, keeping children safe will be part of our organizational culture. Special attention will be given to situations of bullying or other type of abuses that may happen from a child to another child; such situations will be investigated in a more sensitive manner, supporting both, the child victim and the abuser child.

6.1. Human resources

The Child Protection Policy apply to all staff, Board members, volunteers and collaborators, short-term or part-time experts, all these categories being strong bonded to the organization in their quality of employees, representatives of the main decision body, having volunteering, civil or service contracts.

6.1.1. Staff

Within the HR policies will be introduced specific measures to implement the principles of the Child Protection Policy. In this regard, starting with the recruitment phase, we will promote and state CONCORDIA's zero tolerance to child abuse, specifying in the vacancy announcement this organizational environment⁵. Every job description will comprise the ban of child abuse and will have

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.

the Code of Conduct as annex. Additionally, there will be included performance indicators to reflect the way in which the child protection policy is followed and its procedures implemented by the respective staff. The new employees as well as the collaborators working based on civil or service contracts will have a special session in their onboarding period allocated to the Child Protection Policy and its procedures. For the current employees and collaborators, special information and

training session will be organized to introduce the Child Protection Policy and the CONCORDIA's Code of Conduct. For the evaluation of the work performance there will be set indicators to measure the level of the policy implementation according to the job responsibilities in the regular work. Any breach of the Code of Conduct or any behaviour which are in contradiction with the current policy will be investigated and measures will be taken according to the HR policy, Rules of Interior and national legislation and could lead to penalties, suspension or dismissal.

In every national organization a National Focal Point on Child Protection (NFPCP) will be assigned from the existing employees; he/she provides a focal point for all issues concerning violation of child's rights in the organization. When the NFPCP is not accessible being located in a different location and children want to talk with somebody in person, they will choose a "Person of Trust" from the employees located nearby to whom they are comfortable to talk to in case they feel unsafe in a certain situation or in the presence of a certain person. The Person of Trust will communicate with NFPCP regarding potential abuse allegations and decisions will be taken about starting of internal investigations.

6.1.2. Volunteers

CONCORDIA has guidelines for selection of volunteers, including criminal and medical records and references from previous volunteering hosts/employers or from lecturers. The volunteers will sign the Code of Conduct and the Child Protection Policy. In their first six weeks of volunteer assignments, they will undertake an intensive onboarding program which consist of training sessions on topics like roles, responsibilities and restrictions of volunteers, children's needs, recognize the signs of abuse and be knowledgeable about the mechanism to report them. Termination of assignments could be decided any time before ending the volunteering contract if volunteers fail behaving according to the Code of Conduct and the current policy.

6.1.3. Board members

The Board members commit to the Child Protection Policy and to the Code of Conduct and will have the overall responsibility to oversee and ensure the policy's implementation within the national organizations. Once a year, the Board will receive a child protection report prepared by the national management with the support of the NFPCP and following, the next annual plan regarding child protection policy implementation actions is developed.

6.1.4. Awareness raising, training and supervision

In order to be effective implemented, the Child Protection Policy has to be understood accurately by all those that the policy applies to. The policy is translated in all the languages of the national organizations. Training and supervision are essential for the child safeguarding in the organisation, hence all new employees, collaborators having civil or service contract, short-term or part-time experts, volunteers and Board members receive in the onboarding period, within the first week of activity, an introduction to the Child Protection Policy. Within the first three months from the start

of the activity in the organization, an in-depth training is organized and tailored according to the roles and responsibilities towards children of the new employees/volunteers /experts/collaborators. For the current employees/volunteers/experts/collaborators, a learning analysis has been conducted with the purpose to understand and identify the learning requirements of the employees to enable them to fulfil and apply the provisions of the CPP and its implementation procedures. An in-depth training curriculum was developed tailored to the identified learning needs. It is important that everyone knows the roles, responsibilities and mechanisms for reporting and responding to child abuse allegations.

Annual training and information sessions on safeguarding children, including awareness rising and reporting systems, are organised for all employees. Besides, the staff with particular responsibilities relating to children will continue to benefit by the supervision program, where diverse case studies are presented and solutions or approaches are discussed and identified.

A child-friendly version was elaborated with the support of children and young people and periodic information sessions are organized with them, according to their level of understanding.

In all partnerships of the organization that involve getting in contact with children, the policy is mentioned to highlight the organization's zero tolerance to abuse. CONCORDIA wants to assure that everyone connected to the organization should understand child abuse and all its implications on children mental and physical development, to the employees, to the organization and its partners and at large, to the society.

6.2. Building child-safe projects and programmes

6.2.1. Risk assessment

CONCORDIA is committed to plan, design and deliver projects and programmes that are safe for children. When planning new projects, altogether with the beneficiaries and communities needs assessments there are conducted also risk assessments in order to identify possible risks to children. As a next step, there are identified risk mitigation actions in order to have a final decision about the setting up of the new service. However, risks assessments will be conducted periodically in the current services, within the periodically process of evaluation of services, so that, based on findings to make necessary adjustments. Moreover, before any kind of activity that has a certain potential of hazards that could harm children, for example trips or camps, a risk assessment is conducted. If the risk is too high and cannot be reduced, then any project or activity will not be further implemented. The decision is then taken accordingly by the management of the organization.

6.2.2. Set-up of new projects

When projects are being set-up, all stakeholders should be involved: children, families, communities, local authorities and other public decision making bodies. National standards for social services should be followed, when these exists and are legally bounded. Clear criteria for selection of the beneficiaries for situations when the type of services is very needed for a larger number of children or families then the maximum capacity of the project are set. No discrimination is being made due to ethnicity, religion, gender etc. when setting up the criteria for selection of beneficiaries. To all beneficiaries will be presented, in a manner according to their capacity of understanding, the

services they will get as well as their obligations, and a service contract will be signed according to the legal provisions from each country. Parental or legal guardian, as well as child's consent in written should be taken as soon as new projects or activities are decided to be commenced. Also,

both, the child and the parent / guardian / legal representative will be informed on how they can report any violation of the child's rights and the possible consequences of such actions (organization's telephone number and address as well as the name of the person in charge with receipt of reporting for any case of violation of children's rights, etc.).

6.2.3. *Listen to the children*

Getting always direct input from children and young people is another aspect which makes our projects and programmes more effective and responsive to their needs. Children and young people are organized into children's councils (or for example, in CONCORDIA Romania it is called Children's Parliament).

6.2.4. We expect from our staff to observe children and to discuss with them in case they are afraid to talk about bullying or discrimination happening to them or to their peers in school or in their neighbourhood. *Partners*

When selecting the partners of our projects we check if there was any misconduct in their past activities, if they have a good reputation, an ethical code for their employees or a child protection policy of their own, if the case. However, in all the partnership agreements or service contracts, ethical aspects and obligations regarding safeguarding children will be included. If the scope of the partnerships or the contracted services also involves direct contact with children, the Child Protection Policy and the Code of Conduct should be assumed and signed before commencing the activities. If any allegations of an incident or violation of children's rights happens during the partnerships or service contracts implementation, then an investigation is being made and a decision to terminate these collaborations is taken immediately.

6.3. Media and communication

CONCORDIA commits through this Child Protection Policy as well as through its policy on communication and fundraising and the Code of Conduct, to undertake all communication in a safe manner for its children benefitting by the provided services. In all the organization's activities of communication and fundraising we protect the child's image, privacy and dignity. For all children in our care or benefitting by any service in our organization, permission from parents/legal representatives for taking images (pictures or videos) of them should be taken in written as preferable before every footage or event where mass-media is present and they should be informed about the subject and the purpose of the footage in advance. Any images taken of children for organizational purposes should be decent, children in decent postures, wearing adequate cloths and as much as the situation allows, do not show an extreme distress of the children. The real name of the child must not be revealed in any external reports. For communication and fund raising purposes is preferable to use pictures with children from bank of pictures, to avoid being uploaded on internet and social media the real images of the children, especially when the communication material contains sensitive information about a child. In any event in which journalists are involved, they will be informed about the CONCORDIA's expectations in regard to footages of children and will be asked to present to the organization's communication person the resulted material to approve on what is being used in what way.

The stories of children used for reports, communication or fundraising materials should evoke not only the problems they were confronted with but the strengths and supports nets they found or may find with the support, to overpass those problems. We do not ask children to promote a certain brand of a company in return to a donation, for example taking pictures of them wearing hats with a company brand. Children may take pictures, from their own initiative, wearing clothing items with logos of companies, but this is not connected with any expectations of receiving donations.

CONCORDIA forbids the employees, board members, volunteers, visitors, other persons who are coming in contact with our children to post on social media or other channels unofficial pictures or videos of children they met in the organization; they can like or share official posts of the organization. Group pictures from different artistic events could be exceptions. "Tagging" children shown in photos or videos is not permitted. Young people will also be educated not to share official CONCORDIA posts and tag themselves in the pictures.

The employees must not be friends on their personal social media accounts with the young people they are working with, unless the connection is considered necessary and, the employees' social media accounts become professional accounts, where no personal information and pictures are to be posted. The social media "friendship" should be used as an opportunity to raise awareness on the social media threats and educate young people to safe social media use.

6.4. Sources of funds

CONCORDIA's sources of funds are screened against compliance with our values and mutual interests. We look for financial support from companies or major donors whose image, behaviour or products are not harmful to children, families or communities. Therefore, we do not accept or seek for financial support from companies producing or distributing mass destruction products, products causing damages to health or to the environment (tobacco industry, spirits industry, weapon industry, pornographic industry), or involved in scandals related to use of child labour, corruption, political and money laundry⁶. CONCORDIA cannot be made responsible for receiving donations from companies or foundations of companies having hidden businesses, which cannot be found as a result of our regular screening of public sources. For sensitive situations, the Board will decide about actions to be taken in case of revealing in public sources such business ethical misconduct.

6.5. Visitors

The visits should be preferable planned in advance, taking into account the children's schedule. Also a list containing the names, functions and companies about the visitors should preferable be sent in advance to the attention of the responsible person, whether is project coordinator, PR officer, or the executive director. The visitors should be informed in advance about the activities that are being done with and for children in the project that will be visited. For their entire visit in the project, one or several responsible employees, depending whether it is one person or a group, will accompany the visitors. The visitors are expected to: respect the date and time of the planned visit, respect the guidance of the companion of the organization, treat children and/or their families with respect and dignity, do not exchange of contact details or communicate with children outside the project, do not show favouritism to a certain child, do not take photographs or videos of an individual child without permission of the family or the organization, do not use inappropriate language or behaviour with children, do not label the children, offend them or express a discriminatory position towards them. Moreover, any visitor must not enter in the private space (bathrooms, sleeping rooms) of children without asking first their permission.

6.6. Use of information technology

CONCORDIA operates the information technology and behave online according with our values and within the law.

⁶ See „CONCORDIA strategy for business cooperation“ - Stuttgart 28 December 2017

In this regard, we will provide guidance to staff and volunteers as well as to children in order to appropriate use of information technology including social media.

Filters and blocking software will be installed to ensure that inappropriate/offensive sites like those with pornographic or violent content, cannot be downloaded from the organization internet connection by both employees/volunteers and children. Any breaches of filtering, illegal use, downloading or creating indecent images of children, cyber bullying, or use of information technology to abuse a child will be investigated and measures will be taken against the staff or the volunteers that made such thing.

The information technology is very important for children's education and development and we support them with terminals and internet connection. In the same time, we have to safeguard children when they are online. For this reason we inform them about the risks the Internet has, also in terms of what is legal or not and require 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 primarily addressing the best interest of the child and his/her psychological and physical wellbeing, whether there is involved a child from the specialized care or from the day care services. Any adult who witnesses a harm of a child or recognizes signs of abuse on children from our organization must report it to NFPCP. Every child abuse allegation is investigated internally and child protection and law enforcement authorities are announced about the case immediately in case of an evident, proved abuse of a child. The first measure is to ensure the safety of the child victim and provide necessary psychological and medical support immediately.

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

7.2. Accountability, Monitoring & Review of the observation of the CPP

CONCORDIA is accountable towards the children in need, to whom it provides support through its various social and educational programmes, to the families at risk of abandoning their children due to extreme poverty and associated causes, to the communities in which it is present to support the provision of services for their inhabitants facing difficulties and to our supporters. Thus, will monitor the fulfilment of children's rights in our services or projects, to both prevent violation of their rights and to intervene promptly and restore a normal situation for the children according to our policy, national and international rules and legislation.

The national and international directors are responsible for determining the good practice and for implementation of the Child Protection Policy in their areas of organizational responsibility. Once a year, the executive directors present to the Board a report concerning the child protection situation in the national association, number of allegations of abuse, number of children harmed, which type of abuse where revealed, how many of the allegations have been confirmed and what were the solutions to restore the child wellbeing and how the perpetrator was sanctioned.

On annual basis a self-assessment of the child protection policy measures implementation is conducted at the level of each project following a given 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, or strategies to mitigate the identified risks. The process for conducting the self-assessment and elaboration of the national annual plan will be coordinated by the NFPCP. The plan is approved by the executive director (for programmes) and presented to the board in the meeting regarding the budget planning.

The Child Protection Policy will be reviewed at every three to five years or when changes at the level of the national legal frameworks influence the provisions of the policy and the reviewed version is approved by the board. The reviews take into account lessons learnt and suggestions from children, staff, collaborators, volunteers and partners, which are involved in our activities with and for children. The review process is initiated and coordinated by the NFPCPs and involves programmes, communication and fundraising staff from all national organizations.

8. Code of Conduct

CONCORDIA national organizations have code of ethics in providing services for children, as required by law (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 abuse of children). However, a complete Code of Conduct, that will reflect the Child Protection Policy, will be developed to provide guidance for adequate and desired behaviours of employees towards children. Versions will be developed for volunteers, collaborators and visitors.

The scope of the Code of Conduct is to raise awareness for the staff members and all the other collaborators and not to punish or sanction them. Any person who has proven that violated the Child Protection Policy and the Code of Conduct will be (disciplinary, if employee) enquired and according to the findings, the provisions of the labour and civil laws and of the Rules of Interior will be applied, like sanctions or termination of the labour or service contracts. In case of a severe case, when abuse over a child is obvious and there is no doubt regarding the perpetrator, we announce immediately the law enforcement authorities to take the respective legal measures according to the criminal law. A set of guidelines will be developed also for highlighting the desired behaviours of children in relation to other children.

The Code of Conduct⁷ will be translated and printed and every employee, members of the board, volunteers, and collaborators will read it and sign it to commit to its content. If support is needed to understand some of the content, NFPCP will assure the necessary support. The Code of Conduct is also intended to protect staff and the other adults involved or in contact with CONCORDIA from malicious allegations of inappropriate behaviour towards children. The Code of Conduct will be also

⁷ The most important expected or undesirable behaviours in regard to child protection aspects that will be included in the Code of Conduct are listed in the Annex 2.



posted on the national organizations websites to be visible to any new potential employee, partner or volunteer.

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 provider⁸ while working or associated with CONCORDIA.

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

⁸ Please circle the applicable variant

ANNEX 1: Definitions and recognising signs 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. Physical harm may also be caused when a parent or carer fabricates the symptoms of illness in a child.

“Psychological abuse” includes both emotional and mental abuse, while emotional abuse effect is impairing emotional development and mental abuse effect is impairing intellectual development. **Emotional abuse** is where repeated verbal threats, criticism, ridicule, shouting, lack of love and affection causes a severe adverse effect on a child's emotional development. It includes conveying to children that they are worthless, unloved, inadequate or valued only insofar as they meet the needs of another person. Emotional abuse may include not giving a child opportunities 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, over protection and limitation of exploration and learning, or preventing the child from taking part in normal social interaction. It may involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved 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 lacking empowerment. Mental abuse determines difficulties in the acquisition of basic skills, specifically deficits in reading, languages and maths, affecting the intelligence, memory, recognition, perception, attention, imagination, and moral development.

“Sexual abuse” involves forcing or seducing a child or young person, 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 non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities or hearing language with sexual connotation, 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 also the early marriage or engagement of children involving sexual intercourse (especially in Roma communities) and the sexual harassment in the case of children working according with 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.

“Neglect” is defined as the persistent failure to meet the child's basic physical and/ or psychological needs, likely to result in the serious impairment of the child's physical or cognitive development. Neglect can occur in several forms:

- nutrition neglect - deprivation of food, the absence of more food essential to growth, irregular meals, inappropriate food or inappropriate use of food according to the child's age;
- clothing neglect - inadequate clothes for the season, clothes too small, dirty clothes, lack of clothes;
- neglect of hygiene - lack of body hygiene, repellent smells, parasites;

- medical neglect - lack of necessary care, omission of vaccinations and control visits, failure to apply treatments prescribed by a physician, failure to attend recovery programs;
- educational neglect - sub stimulation, instability of the system of punishment and rewards, lack of follow-up of school progress;
- emotional neglect - lack of attention, physical contacts, signs of affection, words of appreciation.

Leaving/ abandoning the child is the most serious form of neglect⁹.

“Bullying”¹⁰ 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, by the bully or by others, of an imbalance of social or physical power. 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 cyber. If bullying is done by a group, it is called mobbing.

„Cyber bullying”¹¹ or cyber harassment is a form of bullying or harassment using electronic forms of contact. Harmful bullying behaviour can include posting rumours about a person, threats, sexual remarks, disclose victims' personal information, or pejorative labels (i.e., hate speech). Victims may have lower self-esteem, increased suicidal ideation, and a variety of emotional responses, retaliating, being scared, frustrated, angry, and depressed.

„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 videos of a victim and uploading or sharing media of a victim that have vulgar, indecent, obscene or sexual content. It also includes online harassment, cyber-stalking, hacking someone else's online accounts, or tracking someone's electronic devices, as well as misrepresenting one's self 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 is 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 from criminal activities including the sale and distribution of narcotics, the involvement of children in any harmful or hazardous work.

“Commercial sexual exploitation of children”¹² comprises sexual abuse by the adult and remuneration in cash or kind to the child or a third person or persons. The child is treated as sexual object and as a commercial object. The commercial sexual exploitation of children constitutes a form of coercion and violence against children, and amounts to forced labour and a contemporary form of slavery.

„Child pornography”¹³ means any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes. This can include photographs, negatives, slides, magazines, books, drawings,

⁹ “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

¹⁰ Wikipedia

¹¹ Wikipedia

¹² „Questions and Answers about the Commercial Sexual Exploitation of Children”, ECPAT International, 2001

¹³ „Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography”, United Nations, 2000

movies, videotapes and computer disks or files. Generally speaking there are two categories of pornography: soft-core which is not sexually explicit but involves naked and seductive images of children and hard core which relates to images of children engaged in sexual activity and use of children in the production of pornography.

“Child abduction¹⁴” is the unauthorized 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 he / she has been stolen; human trafficking- when a stranger steals a child with the intent to exploit the child themselves or by trade in a list of possible abuses including slavery, forced labour, sexual abuse, or even illegal organ trading; murder).

“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 migration¹⁵. Many child migrants are exposed to harm during the journey and at 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 migrants die on the journey from dehydration, malnourishment, suffocation or transportation accidents or drown at sea. Unsafe migration conditions, by their nature, create risks for children. In addition to experiencing acts of violence, children risk to come 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 influence the well-being, safety and development significantly of the child.

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 to 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

¹⁴ According to National Centre for Missing & Exploited Children

¹⁵United Nations High Commissioner for Refugees, Conclusions on Childre at Risk, Executive Committer Conclusions, no. 107 (LVIII), 2007

Signs of possible sexual abuse

- The child has an excessive sexualised behaviour or language, or regularly engages in sexual play inappropriate for their age
- 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 mixing well with other children
- Sleep or speech disorders
- Negative statements about self
- Highly aggressive or cruel to others
- Extreme shyness or passivity
- Drug or alcohol abuse
- Chronic running away
- 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 respond to
- Frequently hungry
- stealing food
- Frequent lateness or non-attendance at school
- Low self-esteem
- Poor social relationships

ANNEX 2: Code of Conduct

DO:

- Be informed about what constitutes violence on children and of the provisions of the Child Protection 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, without any discrimination;
- Maintain high standards of personal and professional conduct both personally and in others.
- Be aware of high-risk of abuse of some situations (i.e. unsupervised mixing of older and younger children) and make everything possible to eliminate such situations;
- As a care-giver, observe and listen the child in order to help him/her; child 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 of his/her image and dignity;
- Be aware of all the media and communication guidelines and of the using the informational technology in order to protect children;
- Be a good example for children, partners and colleagues.

DON'T:

- Abuse of any kind the children;
- Never have a child whom you work with stay overnight in the adult's room or sleep in the same bed;
- Do not discriminate, shame, humiliate children, including using language that mentally or emotionally abuse a child;
- Do not stay alone with a child in different activities that might be questionable by others
- 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 organization;
- Do not take pictures or record videos with a child without being required by the organization;
- Do not do things for children that 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.