

CHILD PROTECTION POLICY

2024

Policy Guidelines, Principles and Procedures on Child Safeguarding and Protection
at Status M

Version: 1

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INTRODUCTION

The present document is annexed to Status M's Code of Conduct. The document represents Status M's policy, principles and procedures regulating child safeguarding and protection measures taken by staff members of Status M within the undertaking of their professional roles.

Status M affirms its belief in the rights of all children, including the right to be protected from all forms of violence, abuse, neglect and exploitation and to develop to their full potential, be healthy and happy, as set out in the 1989 UN Convention on the Rights of the Child (UNCRC) and in the Council of Europe Convention on Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention, 2007).

Children with whom Status M staff, volunteers, interns, external collaborators, and associates come in contact will be assured of the rights expressed in the UNCRC. Through its work, Status M aligns with the EU Strategy for the rights of the child and promotes action to support children's participation in political and democratic life, their economic and social inclusion, their right to health and to education, providing equal opportunities to all children, to prevent violence against children and to protect them from violence, to promote a justice system that responds to the needs of children, to promote a safe digital experience for all children, and to support children globally.

Status M takes the prevention of child abuse very seriously. Status M understands that child abuse and inappropriate contact with children is a pervasive problem throughout the world that must be managed proactively. Therefore, the writing of this policy shows the commitment to taking proactive steps to safeguard and protect children in Status M's programmes, facilities, and networks, both online and offline.

Status M is committed to making decisions and taking actions that are guided by the principle of the "best interest of the child".

The document counts six different sections, which address:

1. Definitions used in the policy and Status M's work,
2. Values and principles, which should be respected and promoted by all staff members,

3. Screening and hiring practices at Status M,
4. Principles of conduct & procedures of staff in contact/working with children,
5. Reporting procedures in case of any child abuse concerns staff members may have or suspect,
6. Cooperation with other external organisations, networks, and agencies.

Status M's Child Protection Policy is produced by the Child Protection Officer and approved by Status M's Assembly. The document is evaluated against EU standards and practical experience and updated at least once a year.

1. DEFINITIONS

For the purposes of the present policy, the following definitions apply:

Best Interest of the Child (BIC)

It is a threefold concept: a right, a principle and a rule of procedure based on an assessment of all elements of a child's or children's interests in a specific situation both in the public and private sphere which must be determined on a case-by-case basis taking into consideration their personal context, situation and need. Accordingly, the concept of the child's best interests is flexible and adaptable. The concept of the child's best interests is aimed at ensuring both the full and effective enjoyment of all the rights recognised in the 1989 UN Convention on the Rights of the Child (UNCRC) and the holistic development of the child. The full application of the concept of the child's best interests requires the development of a rights-based approach, engaging all actors, to secure the holistic physical, psychological, moral, and spiritual integrity of the child and promote his or her human dignity¹.

Child²

Every human being below the age of eighteen years³.

Child Protection

The prevention and response to violence, exploitation, and abuse of children in all contexts.⁴

Child participation

Child participation means that children, any person under the age of 18 years, individually or in groups, have the right, the means, the space, the opportunity and, where necessary, the support to freely express their views, to be heard and to contribute to decision making on matters affecting them, their views being given due weight in accordance with their age and maturity. To be able to participate meaningfully and genuinely, children and young people

¹ As defined by the Committee on the Rights of the Children, General comment No. 14 (2013) on the right of the child to have his or her best interests taken as a primary consideration (art. 3, para. 1)* - Available at:

https://www2.ohchr.org/English/bodies/crc/docs/GC/CRC_C_GC_14_ENG.pdf

² For this policy, we use child/children and minors interchangeably.

³ As defined by the UN - Convention of the Rights of the Child. Available at: <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

⁴ As defined by UNICEF. Available at: <https://data.unicef.org/topic/child-protection/overview/>

should be provided with all relevant information and offered adequate support for self-advocacy appropriate to their age and circumstances.⁵

Child safeguarding

Child safeguarding is specifically focused on preventative actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm.⁶

Staff members

Refers to paid staff, volunteers, interns, and external collaborators.

Status M takes all measures to protect the child from all forms of child maltreatment and inappropriate behaviours.

Child maltreatment is the abuse and neglect that occurs to children under 18 years of age. It includes all types of physical and/or emotional ill-treatment, sexual abuse, neglect, negligence and commercial or other exploitation, which results in actual or potential harm to the child's health, survival, development, or dignity in the context of a relationship of responsibility, trust, or power both in the presence or through information technology.⁷

Specifically, Status M defines it but is not limited to the following:

Child Abduction

The crime of removing a child from its rightful home.⁸

Physical Child Abuse

Physical abuse is an injury deliberately inflicted upon a child by any person, including adults. Physical abuse includes fractured or broken bones, burns, severe and/or frequent bruises, and any other intentionally inflicted physical harm.⁹

⁵ As defined by the Council of Europe – Recommendation CM/Rec (2012)2 of the Committee of Ministers to member States on the participation of children and young people under the age of 18. Available at:

https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805cb0ca

⁶ As defined by SaveTheChild. Available at: <https://www.savethechildren.org/us/what-we-do/safeguarding-children>

⁷ As defined by WHO – Violence Against Children, Child Maltreatment. Available at: https://www.who.int/health-topics/violence-against-children#tab=tab_2

⁸ As defined in the Collins dictionary. Available at: <https://www.collinsdictionary.com/dictionary/english/child-abduction>

⁹ As defined by Kids Matters – Physical Abuse. Available at: <https://kidsmatterinc.org/child-safety/types-of-child-abuse/physical-abuse/>

Child Emotional Abuse

Emotional abuse happens when a child is repeatedly made to feel worthless, unloved, alone, or scared. For instance: continually ignoring or rejecting a child, physically or socially isolating a child, forcing a child to do things by scaring them, constantly criticizing, humiliating or blaming a child, constantly swearing, yelling or screaming at a child, bullying, teasing, insulting or belittling a child, having unrealistic expectations or unreasonable demands of a child, not allowing a child to explore, express themselves, learn or make friends, treating a child badly because of things they can't change.¹⁰

Child Sexual Abuse

Is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, and that violates the laws. Child sexual abuse is evidenced by this activity between a child and an adult or another child who, by age or development, is in a relationship of responsibility, trust or power, the activity being intended to gratify or satisfy the needs of the other person.¹¹

Child Pornography

Any material that visually depicts a child engaged in real or simulated sexually explicit conduct or any depiction of a child's sexual organs for primarily sexual purposes.¹²

Exploitation of Minors in Prostitution

As defined in the Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography, child prostitution is the "use of a child in sexual activities for remuneration or any other form of consideration".¹³

¹⁰ As defined by Kids HelpLine – Understanding Child Emotional Abuse. Available at: <https://kidshelpline.com.au/parents/issues/understanding-child-emotional-abuse>

¹¹ As defined by WHO – Child Sexual Abuse. Available at: https://www.who.int/violence_injury_prevention/resources/publications/en/guidelines_chap7.pdf

¹² As defined by Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse. Available at: <https://rm.coe.int/1680084822>

¹³ As defined by Convention on the Rights of the Child's Optional Protocol on the Sale of Children, Child Prostitution, and Child Pornography. Available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/optional-protocol-convention-rights-child-sale-children-child>

(Child) Grooming

Grooming is when someone builds an emotional connection with a child to gain their trust for sexual abuse, sexual exploitation, or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know, for example, a family member, friend or associate.¹⁴

Bullying

Bullying is unwanted, aggressive behaviour among school-aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time.¹⁵

Neglect or negligent treatment

The failure to meet children's physical and psychological needs, protect them from danger or obtain medical, birth registration or other services when those responsible for children's care have the means, knowledge and access to services to do so.¹⁶

Child Exploitation

Child exploitation includes child domestic work, child soldiers, the recruitment and involvement of children in armed conflict, sexual exploitation and pornography, the use of children for criminal activities, including the sale and distribution of narcotics and the involvement of children in harmful or hazardous work.¹⁷

Online Sexual Violence

The use of computer systems to cause, facilitate, or threaten violence against individuals (including children), that results in (or is likely to result in) physical, sexual, psychological, or economic harm or suffering and may include the exploitation of the individual's circumstances, characteristics or vulnerabilities.¹⁸

¹⁴ As defined by the National Society for the Prevention of Cruelty to Children. Available at: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/online-abuse/>

¹⁵ As defined by the European Council. Available at: <https://www.coe.int/en/web/children/bullying>

¹⁶ As defined by UNICEF. Available at: https://www.unicef-irc.org/portfolios/general_comments/CRC.C.GC.13_en.doc.html

¹⁷ As defined by Terres des Hommes. Available at: <https://www.terredeshommes.org/causes/child-exploitation/>

¹⁸ As defined in Mapping study on cyberviolence by the Council of Europe, 2018. Available at: <https://rm.coe.int/t-cy-2017-10-cbg-study-provisional/16808c4914>

2. PRINCIPLES AND VALUES

Status M is committed to the following values and principles, which should be respected and promoted by all its staff members:

- Status M values and treats every person without discrimination of any kind, irrespective of age, race, gender, class, religion, political or other opinions, national, ethnic, or social origin, gender identity or sexual orientation, abilities or other status.
- Status M has a zero-tolerance policy towards any kind of inappropriate behaviour, violence or abuse of all people, especially those from vulnerable groups and children.
- Status M recognises the right of every child to be protected from harm and abuse stemming from inappropriate behaviours as defined in Section 1 of the present policy. Status M takes all necessary action to prevent any harm from being done against children and to report abuse against children.
- The best interest of the child always comes first in the undertaking of our Organisation's activities.
- Status M promotes the right of children to be heard, participate, and share their views in matters which affect them, and supports this approach in its activities.
- Status M conducts all its activities, from project design, risk management, to implementation, ensuring the safeguarding of children plays a central role and according to child-centred and trauma-informed approaches.
- Status M provides all necessary guidance to its staff members who work in close contact with children.

3. SCREENING AND HIRING PRACTICES

Status M establishes and sustains proper hiring and selection practices, including completed applications, reference checks, and, if necessary, criminal background checks in accordance with Croatian law, and includes specific reference to Child Protection in its Code of Conduct.

3. 1. Applications

- All prospective staff members will be invited, through a public call, to submit a CV as part of their application, which should include details on their previous work experience, volunteer involvement, educational background, and contact information for references.
- In the next phase of the candidate selection process, interviews will be conducted with individuals who meet the requirements of the call. During the interviews, candidates will be informed about Status M's zero-tolerance standard for any inappropriate behaviour, violence, or abuse towards any person, especially individuals from vulnerable groups and children, by staff members.
- All staff members who may be involved in working with children and young people, or who are deemed likely to come in contact with children in the fulfilment of their duties, will be requested to provide a certificate of their national criminal record.

3. 2. Reference checks

Status M reserves the right to apply the following reference check procedures to any candidate applying for a post:

- Contacting previous employers/agencies to check if the prospective staff member is eligible for rehire, as well as to ask about the ability of applicants to work with children.
- Verbally verifying written references via telephone or other means of contact.
- Researching a candidate online and checking for red flags for working with children (i.e. Google Search, any national sexual predator websites, and social networking sites).

3. 3. Interviews

- Prospective staff members should be interviewed and assessed by at least two separate staff members.
- All interviews will be documented using the Status M interview evaluation form, which ensures consistency in the questions asked and facilitates candidate assessment.

4. PRINCIPLES OF CONDUCT & PROCEDURES OF STAFF IN CONTACT/WORKING WITH CHILDREN

The following principles apply when coming in contact or working with children conduct-wise:

4. 1. Compliance with Status M's Code of Conduct & Child Protection Policy

- Before undertaking any work duties, staff members will sign a contract with Status M, which includes the Organisation's Code of Conduct and Child Protection Policy as annexes. When these documents are updated, typically once a year, all staff members will receive the revised versions, which must be signed to confirm their acknowledgment and acceptance.
- All external collaborators who work with or may come into contact with children will be provided with a contract that includes the Child Protection Policy and the Code of Conduct as annexes and will be required to sign them.

4. 2. Data protection mechanisms

The Code of Conduct includes the procedures for data collection and treatment of data about children and young people. Data privacy and protection issues shall comply with relevant EU rules (especially the General Data Protection Regulation (GDPR) (EU) 2016/679.

For the correct handling of child-sensitive data, the following rules apply:

- **Written Informed Consent:** If personal data about minors needs to be collected, written informed consent will be sought from their parents/legal guardians. The data will be collected and used only for the specific purposes for which they are provided. Staff working with children and needing to collect personal data about children or young people shall refer to the Data Protection Policy of Status M and the General Data Protection Regulation (GDPR) (EU) 2016/679. Status M does not share the personal data provided with any other entity.
- **Declaration of Confidentiality:** Staff who may come in contact with the personal data of research participants are required to sign a declaration of confidentiality before engaging in research. The declaration of confidentiality is specific to each case/project.
- **Disclosure of information:** that identifies children who come in contact with our staff members and anyone having a role within Status M, is restricted by the terms of

international, European and Croatian regulations and legislation. Written informed consent of the parents/legal guardians shall be specifically sought. In general terms and following Article 3 of the UNCRC, the best interests of the child will be the fundamental principle applied in all cases. This includes disclosing any type of information (including images) regarding the children we come in contact with, in any media, including printed, online or other.

Specifically, data, including images of children, are only collected if strictly necessary and foreseen as a specific activity of the Organisation or of a project that the Organisation implements. For example, when minors are involved in activities, Status M collects either signed consent forms from parents or legal guardians or official declarations of participation from the institutions where the activities take place, rather than using attendance sheets. Their use is therefore limited only to the project's duration and the specific purpose for which they were provided and collected. Specific permission from the child's parents/legal guardians, as well as the approval of the child, will be sought by the staff of the Organisation implementing the activity, according to the law requirements. Acquired images and data are stored on the local server of Status M and are accessible only by the staff who have the specific credentials and who have subscribed to the Code of Conduct. The data in the local server is protected by a password and cyber-protected against any kind of external access.

- **Publications:** All publications must comply with the Child Protection Policy before being publicised or shared.

4. 3. Training on Child Protection

The rules and expectations will be shared with each new staff member and will be regularly reinforced with existing ones. This will be done in onboarding a new employee and the annual Children's Rights and Code of Conduct meeting. Specifically:

- All paid staff, volunteers and interns (at minimum, those working directly with children) will participate in a comprehensive child protection training throughout their employment period, which includes information on the Rights of the Children (UNCRC, Lanzarote Convention, National regulation), Communicating with Children, Children participation and best interest of the child, Sexual abuse, Prevention, Early Identification, Responding, Documenting, and Reporting. The training programmes are inspired by

existing resources and are developed by building on the programmes already developed through our relevant projects.

- External collaborators who may come in contact with children in the fulfilment of their tasks as assigned by Status M will participate in a dedicated meeting on the topic of child protection.

5. REPORTING PROCEDURES

- All staff members and external collaborators must report any child abuse concerns they may have or suspect, both from internal staff and in an external context. Staff members will be instructed to report anything they notice regarding a gap between policies and practices. Staff members working with or coming in contact with children will also be instructed, through training, on the internal protocols to apply in case they suspect or have knowledge of a situation of child abuse, depending on the type of context.
- Reporting of a suspected breach of the Code of Conduct, and specifically of the Child Protection Policy, follows a standard procedure, which includes a reporting form (annexed to the Code of Conduct and reported here under the Annex section).
- Reports made confidentially will be handled by the Child Protection Policy Officer at Status M, who will assess the case depending on the perpetrator and the context. If deemed necessary, the case may be reported to External Protection Mechanism 1 and further referred to External Protection Mechanism 2. Depending on the severity of the harm done to the child, the case will be reported to the social welfare centre, the police, the State Attorney's Office, as well as the institution where the incident may have occurred.
 - **Child Protection Officer at Status M:** Ms. Elizabeta Matković, elizabeta.matkovic@status-m.hr
 - **External Protection Mechanism 1:** Ms. Zvezdana Batković, batkovic@care.de
 - **External Protection Mechanism 2:** The Ombudsperson for Children in the Republic of Croatia, Ms. Helenca Pirnat Dragičević, info@dijete.hr
- Any member of staff found in breach of the Code of Conduct, or of the Child Protection Policy on which the code draws, will be evaluated on a case-by-case basis. Disciplinary action could be undertaken, including up to termination of employment/cessation of professional engagement with Status M and referral to authorities.

6. COOPERATION WITH EXTERNAL ORGANISATIONS, NETWORKS AND AGENCIES

When coming in contact with external entities such as organisations, networks and/or agencies, Status M will proceed as follows:

- For each new collaboration with external organisations, networks and/or agencies, the selection will consider the child protection history of the entity.
- Status M reserves the right to conduct a reference check on the Partner's previous history related to child protection and its policies towards children.
- Status M will not tolerate any inappropriate communication towards children.
- A clear statement outlining Status M's zero-tolerance approach to child abuse and inappropriate behaviour will be communicated to all entities wishing to become partners. All new partner organisations will be directed to Status M's Child Protection Policy, available on the Organisation's website.
- Status M will take serious action towards any partner organisation accused or convicted of child abuse during the implementation of its projects/programs.

Zagreb, 9 December 2024



Anamarija Sočo
President

Status M

Annex – Status M's Child Protection Policy Reporting form for inappropriate behaviors

Information on the reporting subject ¹⁹	
Name and Surname	
Position within the organization	☐ Staff ☐ Intern ☐ Volunteer ☐ External Collaborator
Information on the alleged inappropriate behaviour reported	
Type of the alleged breach	☐ Physical child abuse ☐ Child emotional abuse ☐ Child sexual abuse ☐ Bullying ☐ Neglect or negligent treatment ☐ Child exploitation ☐ Other types of child maltreatment or inappropriate behaviour:
Context of the alleged breach	
Date	
Place	
Circumstance (training, event, etc.)	
Description of the alleged inappropriate behavior	
Please provide a brief description	

¹⁹ The reporting subject's data will be treated according to EU Regulation 2016/679 (The EU General Data Protection Regulation – GDPR), and for the exclusive purpose of this reporting. Child Protection Officer at Status M will be responsible for the treatment of this data. The reporting subject can refer to them in order to exercise their rights in conformity with Croatian and European law.

Have you observed this behavior personally? If not, how did you come to know about it?	
How would you judge the gravity of the behavior you described?	Low Medium High I don't know
To your knowledge, is this behavior reiterated?	
Name of the child victim	
Information on the alleged author of the breach	
Name and Surname	
Position within the organization	Staff Intern Volunteer Collaborator

Declaration

By submitting this report, the reporting subject declares that:

- They are aware that should the report give rise to legal action on behalf of Status M, it may be used as an official statement,
- They are in good faith and that all the information provided above is correct and truthful,
- They are aware that purposely providing false accusations against someone is a breach punishable by Croatian law.

Signature of the
reporting subject

Place and Date