



Child Protection Policy of C.E.G.A. Foundation

2020



C.E.G.A. - Creating Effective Grassroots Alternatives foundation works for capacity building in different levels, changing attitudes and improvement of policies for social inclusion of disadvantaged communities. In order to provide safe and nurturing conditions for the purpose of interacting with children and youth, the C.E.G.A. has created this document, which outlines the policies, good practices, principles, and rules, which are to be engaged in whenever the organization works with children.

The C.E.G.A. supports basic human rights, including the rights of children. Nevertheless, even with the existence of all international agreements and national laws, the reality is that children alone cannot guarantee their own rights. For this purpose, the C.E.G.A. is striving to help develop a society, in which children not only have nominal rights but also the necessary capacity to feel safe and fully take advantage of those human rights.

By accepting this child protection policy, the C.E.G.A. team guarantees that it will strive to work toward children's safety, protection, well-being and development, in order to help them reach their full capacity as adults.

1. Definitions

1. Child: Every human being aged below eighteen years old.

2.Children's rights¹: Children's rights are a part of the basic human rights, but are specific, since children need specific care and protection.

3. Child's protection: Taking all legal, administrative, social, and educational precautions for protecting a child from all forms of violence according to the Bulgarian Legal System and the UN's Convention of the Rights of the Child.

4. Internal organizational protection of the child: The internal organizational protection of the child is the responsibility that organizations use to guarantee that their employees, activities, and programs do not harm children, do not expose children to risks and abuse and that all potential concerns of the organizations regarding child safety within the communities they operate in are reported to the appropriate authorities.

"I do not harm" addresses the organization's responsibility to "not harm" or to minimize the harm, which the organization might unintentionally cause as a result of ill-designed or ill-implemented projects or programs.

5.Definition of harm and abuse: The following definitions can be used as guidelines:

¹UN's Convention of the Rights of the Child



Physical abuse: The physical abuse and the potential physical abuse, caused by another individual – a child or an adult might include hitting, shaking, throwing, poisoning, burning, drowning, strangling, or any other physical harm of a child, including the falsification of symptoms or worsening the health of the child.

Sexual abuse: Includes forcing or coaxing a child to perform sexual acts, regardless of whether the child is aware of it or not. These acts could be physical - either penetrating or non-penetrating - contact. They could also be either involving children into watching or producing pornographic materials, or directing children towards inappropriate behavior.

Sexual exploitation of children: A form of sexual abuse, which coaxes children to perform sexual acts for financial gain, gifts, food, shelter, attachment, social status, or anything the children or their families might need. This form of abuse might be related to child manipulation, befriending, gaining their trust, or supplying alcohol or drugs. Such forms of abusive relationship are based on a power discrepancy, in which the victim's opportunities are extremely limited. Sexual exploitation might be wrongly interpreted by both children and adults as a relationship, based on mutual consent.

Sexual exploitation of children happens in different ways. It might include an adult perpetrator, maintaining a financial, emotional, or physical control over the child victim. It might also include peers, which manipulate the victim towards sexual acts, sometimes within a gang or a neighborhood. It could also include organized networks of perpetrators, which engage in children trafficking for financial gain.

Neglect: Depending on the context, resources, and circumstances, neglect and a disparaging attitude could be defined as a continuous failure to provide for the basic physical and psychological needs of the child, which might cause serious long-term damage to the child's health, well-being, and development. Forms of neglect include insufficient food, shelter, and clothing, irresponsible attitude towards the child's basic emotional needs, neglect of the mother during pregnancy, alcohol and drug abuse, and inadequate care for a child with disabilities.

Emotional abuse: Continuous emotional abuse, which affects the child's emotional development. Forms of emotional abuse include limiting the child's free movement, humiliation, bullying (including cyberbullying), threatening, discrimination, and any other form of attitude based on hostility or exclusion.



2. Principles

The Child Protection Policy of the C.E.G.A. is based on the following value and principles, which the organization holds for the entirety of its endeavors:

1. Children are unique persons in development, who hold rights. In this sense, one of the C.E.G.A.'s core values is the well-being of children, with their interests being a higher priority than those of adults or third parties.
2. Children deserve respect, regardless of their gender, ethnic background, language, religion, beliefs, limitations, sexual orientation, or social status.
3. We believe that children must be encouraged and supported to participate in all decision-making that has a direct impact on them, and we shall respect their right to do so in all of our activities.
4. Every child has strengths and a potential to grow. Investing in children, in their development, and in their well-being would help them reach their potential, their independence, and would support the prosperity of society as a whole.
5. Protecting children is everyone's responsibility –both for the team and for each individual.
6. All employees of the organization have a responsibility to guarantee that their actions would not bring harm to children and would be guided by respect toward children's rights.
7. Openness and transparency are important elements in the decision-making process of the organization and all activities that follow.
8. Minimizing all possible risks that could arise, while working with children.

3. Ethical Conduct

In its endeavor, the C.E.G.A. is guided by the Ethical Code of the Bulgarian State Agency for Child Protection (<http://sacp.government.bg/normativna-uredba/kodeksi/etichen-kodeks/>).

4. Aims of the Child Protection Policy

This policy considers children not only as objects of protection but also as rights holders. In this sense, the policy and the procedures are an important prerequisite for guaranteeing children's best interests.



1. Child protection. Creating and implementing a child protection policy minimizes the potential risks for harming, abusing, or exploiting children.

2. Representatives of the organization. Implementing this child protection policy aims:

- to give guidelines to employees about the acceptable boundaries in communicating and behaving when working with children;
- to help employees identify potential risks when working with children within and without the working/living place.
- to outline the possible ways, in which employees can act in cases of danger from abuse or misconduct with children or in the case of criminal activity.

3. The organization. Implementing a child protection policy gives the organization clear guidelines and boundaries of engagement when working with children.

5. Range

This policy addresses all employees of the organization and its partners. All employees and partners described below are obliged to read and sign this policy, and to abide by it in all their activities.

The employees are:

- The entire staff, experts – local and international;
- All volunteers and interns.

The partners are:

- All contracted external consultants;
- All Board members;
- All partners, including the ones from the communities we work in;
- All guests and visitors.

Every agreement with partners incorporates a statement that the partners, who do not have a child protection policy will abide by the one issued by the C.E.G.A., or will develop their own policy as a necessary prerequisite of the partnership.

WORKING WITH CHILDREN'S PROCEDURES

1. GENERAL PROCEDURES



1. **Responsibility:** The person responsible for implementing these rules and procedures is the Executive Director of the C.E.G.A.

2. **Staff:** All employees are required to:

2.1. Learn about and adhere to this policy and procedures.

2.2. Familiarize themselves with legal regulations including the Law on Protection of Personal Data, the Law on Protection against Domestic Violence, the UN Convention on the Rights of the Child, and all other mechanisms relating to children's rights.

2.3. Properly secure and protect the confidentiality of information.

2.4. Be aware of possible immediate situations that may put children at risk.

2.5. Plan and organize their work and their workplace so as to reduce the risks to a minimum.

2.6. Strive to maintain a culture of openness and trust, so that any possible problems or concerns to be voiced and discussed freely.

2.7. To ensure that the employees have a sense of responsibility so that any potentially risky practice or behavior is corrected in time.

2.8. To encourage children and young people to form and share opinions on issues affecting them.

3. **Complaints:**

3.1. Employees in the Foundation are required to take a serious, professional and responsible attitude to each complaint about a child at risk received and to any doubt about that.

3.2. Complaints could be received in writing at the office of the Foundation or by email addressed to the person responsible for policy – Rumyan Sechkov, executive director.

3.3. An employee who received a complaint is required to inform the Executive Director or other person authorized by him within 24 hours of receipt.

3.4. Each employee at the Foundation is required to report each suspected case of child abuse or violence against a child to the state institutions - the SACP (State Agency for Child Protection), CPD (Child Protection Department), police, emergency and helpline for children at risk 116 111.

3.5. When an employee is the alleged perpetrator of Child Abuse or violence against a child, punitive measures within the meaning of Bulgarian legislation will be imposed on him.

3.6. For minor violations of these procedures and/or code of Ethics employee's official punishment is a reprimand to dismissal notice.

Scheme of the procedure for sending a signal:



1. You want to submit a complaint.
2. Submit it in writing or by email to Mr. Rumyan Sechkov, Executive Director of the Foundation Adress of C.E.G.A.: 85, Knyaz Boris I Str. 1000 Sofia Bulgaria Email Adress of Mr. Sechkov: sechkov@yahoo.com
3. If the violation has been committed by an employee of C.E.G.A., the Executive Director will act depending on the seriousness of the case, in 3.6. or 3.7. from the upper section.
4. If the violation has been committed by a person who is not an employee of the Foundation or any of its partners, the Executive Director will act in 3.5. from the upper section.

4. **Training:** Employees at C.E.G.A. Foundation are annually required to pass training on policies and procedures for working with children. The trainings are conducted by an internal expert on "Policies and procedures for working with children."

5. **Monitoring:** This policy shall be reviewed and revised every three years, or more often if necessary, according to the changes in context or identified additional needs of stakeholders.

C.E.G.A. Foundation shall provide trustees with information about how this policy was implemented in the operational activities of the Foundation every six months. This information shall include the identified challenges and barriers to policy implementation, monitoring, and results of policy implementation in the operational activities of the Foundation. The Executive Director shall immediately inform the trustees of a breach of policy. Trustees shall take decisions on how to act based on the information presented in the shortest time possible.

6. **Recruitment:** The recruitment and selection procedure includes the following steps with a view to compliance with Child Protection Policy.

6.1. C.E.G.A. publishes a notice through relevant internal and external communication channels (including the Internet) containing a description of the organization, job description, selection criteria, and required documents to the applicant.

6.2. Required documents: CV, cover letter, letters of recommendation, certificates, criminal record certificate.



6.3. After selection by documents selected candidates are invited for an interview. The interview includes questions designed to clarify the professional background of the candidate and his/her experience in dealing with children.

6.4. C.E.G.A. can require up to three recommendations from former employers or others who are aware of the applicant's experience and whether he/she is suitable for a position that requires working with children.

6.4. The successful candidate signs a declaration that he/she shall act in accordance with this policy and procedures for child protection before his first day of work.

6.6. An employee designated by the Executive Director provides training on Child protection policies and procedures for the new employee. Training runs in the following order:

- Presenting the rights of children, past events organized by the Foundation, in which children participated, as well as present events and possible future ones.
- Detailed examination of domestic policy for children of C.E.G.A. in order to ensure its compliance.

7. **Volunteering:** In cases when the organization engages volunteers, external experts or other persons who have a contractual relationship with the Foundation, C.E.G.A. follows the steps described in item 2 of this procedure.

2. Capturing video and photographs

1. When C.E.G.A. team members take film footage or photographs of children they are guided by the Working with children principles described in this policy

1.1. All children filmed or photographed must be properly dressed in accordance with ethical standards. If a more casual look for the children is needed, photos and videos should be selected carefully.

1.2. The recorded content should reflect activity and if it is possible the C.E.G.A. employees should film or take photographs of whole groups of children rather than individual children.

1.3. All complaints about the pictures and videos are recorded and documented as all other signals of child abuse.

2. C.E.G.A. employees who film or photograph children are required to obtain informed consent from the parent/caregiver and the child himself/herself before taking a photograph or film footage. Employers are required to clearly articulate the purpose and methods of use of the materials.

3. When C.E.G.A. employee film or photograph large groups of children and it is not possible to obtain informed consent, they are required to take into account the following: 1) Where the image or video is captured - in a public place or elsewhere.



- 2) Have there been prior notification of filming during the event. 3) If there is no special need and there is no written consent from a parent/caregiver and from a child, C.E.G.A. employees are required not to identify the captured children with any personal data when using the film footage or photographs.
4. C.E.G.A. employees are required to avoid identifying children when they publish textual materials or report upcoming or completed activities unless it is necessary and they obtained written informed consent from the parent and the child.
5. All complaints and reports on video or pictures shall be recorded as reports of child abuse. C.E.G.A. makes a risk assessment and, if necessary, refers to the responsible state institutions.
6. Rules for posting videos and pictures on the Internet are the same as the rules described in items 1, 2, 3, 4, 5, and 6.

3. Conduct of events

1. When performing activities that directly engage children C.E.G.A. employees are required to obtain a declaration of parental/guardian/custodian consent. Children and parents/ guardians/custodians shall be informed by the coordinator of the activities what are their responsibilities and what expectations of their cooperation with the Foundation they could have. This information shall be included in the invitation to them.
2. All documents containing personal information is collected and stored in accordance with the Law on Personal Data Protection and the Law on Child Protection.
3. All staff employed on a temporary contract, or volunteers are required to get acquainted and undertake in writing to comply with and follow these procedures to protect children.
4. Physical space for conducting an activity or event shall always ensure health and safety conditions for working with children.
5. **Risk assessment and mitigation.** C.E.G.A. Foundation and all staff members will carry out a risk assessment of all operations, programs, projects, and activities of the organization under item 6 of the introduction of this Policy. Evaluations will be taken into account and all possible risks that can arise when working with children will be identified and their prevention will be planned. All staff employed on a temporary contract, or volunteers are required to get acquainted and undertake in writing to comply with and follow these procedures to protect children.

4. Collection, management and storage of personal data

1. Child protection policy shall be accessible and available on paper and online to all stakeholders.
2. Personal and contact information of children is not collected, except with respect to specific future activities and conditions expressly agreed with the adults responsible for the children.
3. Any personal information for children which is collected is confidential and shall be destroyed immediately after elimination of the need for its preservation and according to the requirements of the Law of the protection of personal data.
4. The number of employees who have access to the contact information of children is limited to the minimum that is practically necessary for the activities.
5. Communication with children and young people in social networks: Communication with children and youth who participate in activities organized by the C.E.G.A. in a social network is done only through hidden groups (Closed / Secret Groups). Members of these groups are accepted and closely monitored by administrators (the team of the Foundation) who ensure that only children and young people who need to be informed on a particular subject and adults whom the young people know and who are interested in the topic of the group have access. Foundation employees do not accept invitations for personal friendship from children and young people who are members of the groups. Adults admitted to that group shall also be informed about this rule.

Sofia, January 2020

Rumyan Sechkov



Executive director of C.E.G.A. Foundation