



**EQUAL
OPPORTUNITIES
INITIATIVE
ASSOCIATION**

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CHILD PROTECTION POLICY

Equal Opportunities Initiative Association
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Equal Opportunities Initiative Association (EOIA) is Roma Human Rights Advocacy Organization. Our mission is to promote Roma rights through empowering Roma in Bulgaria to self-organize and work independently for fostering policy changes targeted at encouraging public participation and equality of rights. We are working to support the in country democratic legal reforms and equal integration of Roma by keeping the values of rule of law, democracy and pluralism.

Our organization has put forward aims that promote Roma rights by empowering Roma community to establish self-organization structures and work independently for policy changes in order to secure public participation and equality of rights; we are also striving to facilitate the processes of democratic legal reforms and equal integration of Roma through the instruments of the law, strategic litigation, education/training, youth leadership and advocacy. Our team is engaged in the field of human rights for more than 15 years as community based organization, which identifies the utmost needs of the Roma community. The team works on daily basis with the end beneficiaries, as well as with other community based organizations across the country. Therefore, our organization' goals are demand driven and led by our beneficiaries' needs. We organize an excessive number of community meetings with Roma community groups in Bulgaria where end beneficiaries are consulted on their immediate needs. We are actively involved on national level in variety of stakeholder's meetings with national government officials, local government representatives, and civil society stakeholders in order to assist in the formulation of adequate and timely measures aimed at fostering Roma integration into mainstream society. We have developed a strong legal team of experts. It assists legal litigation and actively participates in formulating legislative changes aimed at improving Roma status in Bulgaria. We grew from a community based organization to a nation-wide and international player recognized on EU level as well. We firmly believe that the most important is to empower Roma community to self-promote rights and public participation instead of turning the community members to dependent service users.

Child Protection values

When working on projects and programs connected with children, the EOIA is guided by the following values:

- Recognition of the children as individuals who have the right and the ability to express themselves and to take part in matters and decisions that affect them, including their own protection;
- Ensuring child participation, protection and provision;
- Protecting children from harm – a responsibility for everyone.

Guiding Policy Principles

- Zero tolerance of violence, abuse, exploitation, and neglect of children. Harming children through violence, abuse, exploitation, or neglect will result in criminal, civil and/or disciplinary sanctions; The right to be protected from harm belongs to every child, irrespective of sex, race, ethnicity, gender, socio-economic background, religion, disability and more;
- Restriction for engagement of person who poses a risk to children through ensuring that the personnel, partners, contractors, and suppliers understand their responsibilities and obligations under this Policy;
- Recognition of the best interests of the child;
- Decisions affecting children need to involve children through engaging with children through consultations, providing feedback mechanisms, and supporting their leadership to help design or deliver programming, where possible and appropriate;
- Prioritizing child's welfare;
- Treatment of every child with dignity and as a unique subject;
- Any suspicions, concerns or allegations of harm will be taken seriously and responded to in a timely manner;
- Safeguarding is the responsibility of everybody involved and establishing a partnership approach is key to effective safeguarding;
- Recognition the role of families as primary caregivers.

Definitions

Child: A child is any individual below the age of 18 years (UN Convention on the Rights of the Child, 1989).

Vulnerable Adult: A vulnerable adult is an individual who is 18 years or older and requires or may require assistance and support to live within the community. Such individuals may lack



the ability to adequately care for themselves and/or safeguard themselves against potential harm or exploitation perpetrated by others.

Child protection: Child protection refers to preventing and responding to (intentional and unintentional) violence, exploitation and abuse against children – including commercial sexual exploitation, trafficking, child labor and harmful traditional practices.

Child Safeguarding: refers to pre-emptive actions aimed at mitigating potential harm to children resulting from the activities conducted by Equal Opportunities Initiative Association, including its personnel, interns, consultants, and volunteers, both directly and indirectly. These risks may include physical violence, sexual violence, exploitation or abuse, emotional and verbal abuse, economic exploitation, failure to provide for physical, emotional or psychological needs, harmful cultural practices and privacy violations.

Direct contact: Interacting and working with children, both alone or in a group. This involved being in the physical presence of children as well as interacting with them online.

Indirect contact: Having access to children's information, or working on activities and projects that could directly impact children.

Abuse: Appendix n. 1 at the end of this policy defines the different categories of abuse and provides both behavioral and physical signs of abuse that can be used as indicators of child protection concerns.

Scope and need

EOIA has developed a child protection policy to ensure that all staff (interns, volunteers, and other adults) working with children and vulnerable adults offer child-safe operations and activities. In doing so, EOIA mitigates the risk that its staff and programs pose a risk to children and/or vulnerable adults. In addition, EOIA's child protection policy recognizes that some children are more vulnerable to abuse and therefore outlines measures to take to address increased vulnerabilities and protect them from harm. For the purpose of this policy whenever it is referred to a child the same also applies to a vulnerable adult.

Our policy applies to:

- All board members, staff, interns and volunteers working directly and indirectly with children;
- All adults involved in EOIA activities such as consultants, partners, stakeholders, and trainers;
- All those participating in EOIA activities under different capacities, such as journalists, service providers, sponsors, and donors.

This list is not exhaustive.

For purpose of this policy whenever it is referred to a staff this would also apply to any of the categories above.

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Equal Opportunities Initiative Association's Child Protection Policy

1. Staff and personnel

Staff, board members and volunteers working with EOIA are bound by the principles outlined in the Statute and must adhere to the principles and values of EOIA.

1.1 Recruitment

- Prior to commencing work for EOIA, all adults (members of the Board, staff, and volunteers) must submit documentation to confirm their identity.
- New employees and volunteers must sign a statement of commitment to EOIA's Child Protection Policy.

1.2 Training

- All new employees will be required to read this Child Protection Policy as part of their induction, and become familiar with safeguarding processes within the organization.
- Staff will be required to attend an internal Child Safeguarding training within their first year of joining the organization. This training will be repeated every 2 years.

1.3 Code of Conduct

The code of conduct ensures that the highest standards of behavior are adopted by all staff and any external members or professionals involved in EOIA activities. Any staff member whether they have direct or indirect contact with children in relation to their role have a duty to safeguard and promote the welfare of children.

To this end all staff must:

- Listen to and respect all children and young people.
- Treat all children and young people equally and with dignity. The best interests of the child or adult of concern are paramount in all considerations about their welfare and protection.
- All children have an equal right to protection from harm and this is best achieved by safeguarding practice that is actively anti-oppressive, anti-discriminatory and anti-racist.
- All children must be valued, empowered and supported to inform and shape our activities, including decision-making, risk-identification and review of our safeguarding practices.
- All children should feel that our physical and online environments should be safe and secure and promote enjoyable and positive experiences.
- Involve children and young people in decision-making, as appropriate.
- Provide encouragement and support at all times.
- Use appropriate language and communication (verbal and non-verbal).
- Have fun and encourage a positive environment.
- Offer constructive criticism when appropriate.

- Treat all children and young people as individuals.
- Respect a child's or young person's personal space at all times.
- Agree group 'contract' before beginning any activity.
- Encourage feedback from group.
- Use age-appropriate teaching resources and materials.
- Lead by example.
- Create an atmosphere of trust.
- Respect differences of culture, religion and background.
- Have emergency procedures in place and make all staff aware of these procedures.
- Be inclusive of children and young people with a disability.
- Plan and be sufficiently prepared, both mentally and physically.
- Report any concerns to the Designated Safeguarding Officer and follow reporting procedures.
- Encourage children and young people to report any bullying and to be aware of anti-bullying policy.
- Observe appropriate dress code and behavior.
- Evaluate work practices on a regular basis.
- Report and record any incidents and accidents.
- Ensure proper supervision based on adequate ratios according to age, abilities and activities involved; observe appropriate gender balance for residential.
- Maintain awareness around language and comments made. If you think that something you said may have caused offence or upset, then try to address it in a sensitive manner.
- Children should not be touched in a way that is against the Convention on the Rights of the Child or expose them to inappropriate materials such as pornographic videos and literature.
- No physical harm should be exerted towards children or adults

In case of a breach of code of conduct, procedures identified in clauses 3.4 and 3.5 will apply.

1.4 Management and Safeguarding focal points

A designated Safeguarding Officer is appointed within the organization. The name of the focal point will be made aware to all staff and adults, as well as to children. The focal point will be responsible for regularly reviewing the policy, for delivering internal safeguarding training, and acting as a source of support and information towards staff on issues related to child safeguarding and participation. Ultimately, the Board will have the overall responsibility to ensure the policy's implementation.

If the designated Safeguarding Officer is accused of abusing a child, they must step down from this role and the Board must immediately appoint a new officer who meets the requirements to fulfil this role.

2. Media

2.1 Use of social media, photography and videos

Before using any images or videos of children, written informed consent must be obtained in writing from children and their primary carers. Consent must be informed, meaning that children and legal guardians understand how the media will be used, for how long, and their rights to refuse consent. It must be made clear that they have a right to withdraw consent at any time, however EOIA should clarify that it may not be possible to delete images or videos already posted.

All adults and professionals, internally and externally, who take part in EOIA's activities must ensure that the following principles are adhered to:

- The child's dignity must always be preserved in any image or video.
- All children featured in the organization's publications are appropriately presented.
- Language and description used with images and videos will not shame, victimize, discriminate or stereotype children.
- Photographers, where applicable, will have a certificate of good conduct completed.
- Identification of the organization should be present in shared images or videos.
- No personal information of the child or of their families is present in the image or video.
- Images and videos of children shall not be used without context to portray or sensationalize a false representation or message.
- All media files of children will be stored securely in accordance with data protection laws.
- Members of staff, interns and volunteers must not use images or videos of children for personal use, or share with third parties.
- Cases of missing children are never used in a way that promotes fear or any form of negative response to the situation of the child.

2.2 Application of the policy for external partners, photographers, journalists and others

EOIA believes that in order for its work to be effective, it should be based on transparency and mutual trust, where all partners involved know what to expect from each other, allowing them each to excel in their own specific role in protecting children from any situation of conflict, abuse or neglect.

External organizations working with children on behalf of EOIA or in partnership with EOIA will be expected to have an up-to-date child protection policy.

Where necessary, partners and members from different countries are expected to be aware of local child protection regulations, requirements and procedures to follow in case of a safeguarding incident.

3. Implementing child safeguarding in the organization

3.1 Reporting

All concerns and allegations regarding conduct that is prohibited under this policy should be reported to the Safeguarding Officer. The safety and best interests of the child should always be the guiding principle. The Safeguarding Officer will then immediately report to the acting

Board Members. A decision will be made about whether it is necessary to contact the Local Authorities. In such cases, follow-up should be taken on actions from the authorities. If this is not necessary, then the internal safeguarding procedures should be followed.

If a child or young person is in immediate danger or injured, emergency services, such as the ambulance and the police, should be contacted immediately.

All concerns and allegations will be initiated in a timely manner based on their seriousness and urgency.

3.2 Internal safeguarding procedures

When implementing internal safeguarding procedures, every effort should be made to ensure confidentiality of the situation. Information should be shared on a need-to-know basis, where possible. There are circumstances where sharing information is considered to be in the best interest of the child, for instance in cases of alleged abuse or immediate harm. In these given situations, information must be passed on without delay to the appropriate person or entity such as law enforcement.

3.3 Reporting a concern or allegation

If you are concerned about a child or a child has made a disclosure, the procedure below has been designed to broadly outline the steps to follow:

Create a safe space and non-judgmental space

- Actively listening to the child without interrupting and allowing them to remain in silence should they so wish so. be silent if they wish to.
- Avoid leading questions and statements that could make the child feel ashamed, threatened, unsafe, uncomfortable or insecure.
- Reassure the child that they have done the right thing by speaking up.
- Do not make false promises of assurances or of confidentiality.

Share information

- Report the incident immediately to the Safeguarding Officer.

3.4. Internal investigation of a concern

Any investigation should be fair and done discreetly. As part of the investigation, interviews will be completed with all those involved. If this includes children, a trusted adult should always be present during the interview. Documentation and information available relevant to the situation may also be examined. Those responsible for making a decision will convene after all steps have been taken.

3.5. Allegations towards a member of staff

If an allegation or a concern is raised towards a member of staff, they will be suspended for the length of the investigation and until a decision is made by the Board Members.

The procedure that will be followed is broadly outlined below:

In case of potentially harmful behavior or language towards a child, the Designated Safeguarding Contact will formally address the matter through a discussion with the person concerned, and additional measures deemed appropriate, including i.e., exclusion from certain activities of the organization or ending of the contract or cooperation.

Any action following an allegation of abuse against an employee should be taken in consultation with workplace health protection services and police.

3.6 Anonymous reporting of incidents

To ensure that all incidents are reported, anonymous reports will be accepted.

3.7 Complaints

In the event of complaints or comments:

- o Complaints or comments will be responded to within two weeks.
- o Verbal complaints will be logged and responded to.

4. Safeguarding practices

The following practices must be followed when working with children.

4.1 Risk assessments

Before working with children, a risk assessment should be completed to identify and minimize potential risks. The assessment should consider a child's individual vulnerabilities and circumstances, and should look at:

- the socio-political context, geographic, sociocultural and religious scope and setting of the program.
- the organization's potential impact on or contact with children.
- the potential risks of that impact or contact.
- the risks in terms of likelihood they could occur and the seriousness of the impact on children.
- which strategies (including organizational culture, roles and responsibilities, policies and procedures, systems and processes, capacity building) will be used to minimize and prevent risk will be implemented
- when risks and preventative measures will be reviewed and revised
- how these will be communicated and consulted.

Additionally, a careful weighing of benefits vs. Risks of child participation will be assessed in advance of every program/activity.

4.2. Confidentiality and recording/storing information

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Any information collected about the child and their family should be stored confidentially and in accordance with data protection laws. When possible, information will be stored electronically, with restricted access and only shared on a need-to-know basis. In cases where information collected is in paper format, it should be stored in a safe location within EOIA premises.

Information on children will be kept in accordance with legal retention periods and disposed of safely and in a way that secures their confidentiality.

Children and their families must be informed of what information is stored and that they have a right to access their information at any given time.

EOIA has a duty to ensure that the IT infrastructure is secure and is not open to misuse or malicious attacks.