
Child Protection Policy

Introduction

Romodrom recognizes that especially in situations of poverty, social and ethnic exclusion, children can be extremely vulnerable. Therefore, Romodrom acknowledges as its fundamental duty to protect children engaged within its programmes and activities from any forms of abuse and exploitation. By determining Romodrom's commitment to protect children and setting the key thresholds of behavior desired or unacceptable, this Policy has the following objectives:

- To protect children engaged in Romodrom's programmes from all forms of abuse and exploitation
- To protect Romodrom's organizational integrity and reputation, as well as that of its partners, by introducing sound Child Protection Policy that helps to deter from unacceptable behavior

Terminology

Child means person under the age of eighteen (18) years as defined by the Convention on the Rights of the Child.

Child protection is an activity or initiative designed to protect children from any form of harm, particularly arising from child abuse or neglect.

Child abuse is the physical, sexual, emotional mistreatment or neglect of a child resulting 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.

Policy statement and Romodrom commitments

Romodrom upholds the rights and obligations of the United Nations Convention on the Rights of the Child¹ as is bound to upheld rules governed by European and national legislation² and so is dedicated to protect children engaged in its programmes from harm, exploitation and abuse. Accordingly, Romodrom is committed to implementing and maintaining child protection measures. These include:

- This Policy is introduced and further accessible to all new Romodrom staff and associates; regular refresher training is organized for Romodrom staff directly working with children.

¹ <http://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

² In particular but not only: Act No. 359/1999 Coll., on Social and Legal Protection of Children, as amended; Act No. 109/2002 Coll., on the Execution of Institutional or Protective Education, as amended; Act No. 108/2006 Coll., on Social Services, as amended and including implementing regulations; Act No. 247/2014 Coll. on the provision of child care services in a children's group and on amendments to related acts, as amended.

- Analysis of child protection risks is included in Romodrom projects that involve direct engagement with children.
- Comprehensive child-safe recruitment is in place for personnel directly working with children (see details below).
- Reporting and responding procedures are in place for potential violation of this Policy.

Monitoring and application of this Policy is the responsibility of all Romodrom staff, particularly the senior managers, staff working with children and the staff member designated as Child Protection Focal Point. The management is responsible for the regular policy review and promotion among the target audience.

Standards of conduct and forms of unacceptable behavior

Guidance for behavior that should be observed by Romodrom staff and associates is described in the Romodrom Code of Conduct, Preventing Sexual Exploitation and Abuse Policy and other Romodrom policies. By keeping in mind that behavior and actions taken towards children need additional sensitivity, this Policy aims to complement the Romodrom Code of Conduct and highlight behavior that should be observed and/or avoided when in direct contact with children.

Standards of conduct

- Treat children with dignity and respect regardless of ethnicity, race, gender, age, language, religion, political or other opinion, disability, or other status.
- When working in the proximity of children be visible and, wherever possible, ensure presence of another adult.
- Comply with all relevant legislation, including labor laws in relation to child labor.
- While implementing Romodrom programmes that may affect children, allow them to be engaged in designing the action, listen to them.
- Raise voice (report) when having concerns about child's protection and safety.
- When collecting data from children (during assessments, monitoring and evaluation, etc.) reduce the risk of potential harm by using culturally appropriate ways of communication, obtaining informed consent, ensuring confidentiality and not asking about painful experiences. If distressing data has to be obtained, try to use indirect data collection methods and be prepared to refer the distressed child to professional care.
- When getting and/or using children's images for visibility purposes (i.e. photographing or filming a child/children):
 - Comply with the rules defined by General Data Protection Regulation (GDPR)
 - Ensure that the products (e.g. photographs, films, videos) present children in a dignified and respectful manner, with children being adequately clothed and not in poses that could be misleading or seen as sexually suggestive
 - When taking an image of a particular child for a specific purpose (medialization, advocacy, fundraising, etc.), explain how the product will be used and for that

obtain legitimate consent from the child, whenever possible also from a parent or guardian of the child

- Ensure that images of children availed for public use do not reveal any identifying information

Forms of unacceptable behavior

- Touch a child in an inappropriate or culturally insensitive manner
- Use language or demonstrate behavior that is harassing, abusive, demeaning, sexually provocative, or culturally insensitive towards children
- Engage children in any form of activity that is demeaning, offensive, sexually provocative, abusive or culturally inappropriate or insensitive
- Physically assault or punish children
- Engage children in any form of sexual activity or acts, including paying for sexual services or acts
- Access child pornography through any medium
- Invite unaccompanied children without their and parent's or guardian's approval into solitary places, unless they are at immediate risk of injury or in physical danger
- Sleep in close proximity to unsupervised unrelated children
- Condone, or participate in, behavior of children which is illegal, unsafe or abusive
- Hire children for domestic or other labor which is inappropriate given their age or developmental stage and which interferes with their time available for education and recreational activities, or which puts them at risk of injury.
- Discriminate against, show differential treatment, or favor particular children to the exclusion of others.

Reporting on child abuse

Romodrom strives to create an environment in which victims and persons concerned about the child's safety within Romodrom programmes feel free to report on it. **Romodrom therefore requests all Romodrom staff and associates to report to Romodrom about any suspicion or disclosure of child abuse within Romodrom programmes.**

For feedback and complaints that can come either from programme's target groups including children and their communities or from Romodrom staff and associates, Romodrom has in place a functional complaint mechanism. Intake of complaints and information regarding suspected abuse is possible via multiple safe channels:

- Email address stiznosti@romodrom.cz for submitting non anonymous messages
- Email address pripominky@romodrom.cz for submitting fully anonymous messages (contact details of the sender are invisible)
- Line +420 771 290 222 for submitting anonymous voice-mail messages

All incidents must be recorded and managed in accordance with the relevant investigation procedures and standards. The specific procedures are further elaborated in Romodrom's Compliance Policy document.

Responding to child abuse allegations

While Romodrom takes all allegations of child abuse extremely seriously, at the same time will employ the presumption of innocence while pending an official investigation of the incident. All allegations must be thoroughly investigated. Specific steps that should be reminded and taken into account while investigating child abuse allegations are:

During the investigation process:

All efforts will be taken to ensure the confidentiality and rights of the victim and accused person and information related to the incident will only be shared on a “need to know basis”, but where allegations will amount to a violation of laws of a respective country, privacy will no longer be applicable unless deemed necessary to uphold the rights of the victim.

- The views of the alleged child victim will be considered in light of the documented evidence and that children rarely lie about abuse.
- The accused person will be always given an opportunity to express their views/opinions/version of the facts.
- Where appropriate in investigations, Romodrom will obtain the legal advice and/or advice from any responsible authorities.
- If appropriate (e.g. the incident involves a breach of this Policy), the accused person may be suspended pending an investigation.

Where the incident is proven to have occurred:

- Appropriate disciplinary measures will be taken, including, but not limited to: (a) warning; and/or, (b) suspension; and/or (c) dismissal. The disciplinary measure will depend on the nature and severity of the offence.
- Where the allegation involves a violation of either the laws of the country in which the incident occurs, or the laws of the Czech Republic or the country where the accused person is a citizen, the incident will be immediately reported to the appropriate authorities and the person will be suspended from employment pending an investigation.

Where an allegation is found to be false or unfounded, all efforts will be taken to ensure the rights of the accused person is upheld.

Recruitment of personnel working with children

Romodrom will not knowingly employ or engage in its programmes, and especially in those including regular and direct engagement with children, persons that could pose a risk to children. Romodrom will also respect a local applicable legislation.

Candidates applying for positions that will include regular direct and/or unsupervised work with children will be – before being appointed by Romodrom – checked as follows:

- Reference is provided by former employers / professional referees
- Selected applicants will provide written disclosure regarding whether they haven't been charged with child exploitation offences in the past.
- In projects addressing the child protection and child rights issues, the candidate should preferably have a specific qualification in a childcare, psychological or social field

Analyzing risks to children in Romodrom programmes

Prior to commencement of activities involving children, Romodrom will analyze potential risks to children that can arise as part of the implementation of Romodrom programmes. These activities can include provision of social services to families with children, provision of education and care services to children, training attended by children, working in hospitals or schools, data collections including discussions with children etc.

In case risks to children were identified, the project team in cooperation with Child Protection Focal Point shall prepare an action plan that will address those risks with the aim to reduce them as much as possible. In case risks cannot be reduced to the required level and the project activities would cause harm to children, then the project team shall bring this issue to the senior management that should decide whether further measures can be taken in order to address the risk(s). Activities that would harm children must not be carried out.