



Child and Youth Protection Policy

17/02/2021

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Definitions

Abuse: According to the World Health Organisation, “child abuse” or “maltreatment” constitutes ‘all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, 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’.¹

Child: The United Nations Convention on the Rights of the Child² defines a child as “a human being below the age of 18 years unless under the law applicable to the child, majority is attained earlier”.

Protection Officer: The Protection Officer is a staff member within an organisation or company that leads on safety and wellbeing measures of target groups and acts as a contact person in case there are any questions or concerns related to protection activities.

Protection policy: A set of safety and wellbeing measures for safeguarding the target groups of an organisation or company in the context of their involvement in activities. All staff need to subscribe to the policy and ensure that it is implemented throughout the contact with the target groups.

Staff: European Schoolnet’s Child Protection Policy applies to all staff including Management Team Members, in-house consultants, interns and volunteers. The Policy will also apply to subcontractors and experts.

Stakeholder: A person, organisation or company that is invested in a certain project or activity and contributes to its development and implementation either by providing advice, assets or money.

Template: A form that includes general information to be used to collect personal data and to elicit consent for participation and contribution to an activity, campaign or event.

Young people: A person who is between childhood and adulthood, the period of which varies from country to country. For the purpose of our youth participation strategy, we consider young people to be aged between 12-19.

¹ The WHO definition of Child Abuse as defined by the Report of the Consultation on Child Abuse Prevention WHO – 1999

² <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

Introduction

European Schoolnet (EUN) engages with young people directly within some of its projects and has been collaborating over the years with a number of organisations working with children and young people, such as the Safer Internet Centres (SICs). When EUN works with children and young people, it places the needs of them first and ensures that this goes above all other interests. EUN is guided in its work by the principles set-out in the United Nations Convention on the Rights of the Child (UNCRC). Based on its own³ and its partners' experience⁴, EUN has drafted a Child and Youth Protection Policy which serves to:

- a) Provide a comprehensive overview of the procedures and measures that EUN and its staff need to enforce when working with and for children and young people, to protect the child's health, dignity and well-being which is placed ahead of all other interests.
- b) Establish clear-cut guidelines for staff working with children and young people to facilitate their relationship with children, young people and their legal guardians.
- c) Envisage behaviour protocols to which all stakeholders have to adhere when supporting or financing the activities of EUN
- d) Provide guidelines and templates to be used when children and young people participate in events and campaigns.

Many European countries, in which EUN is active, have national laws and regulations that enforce the protection and wellbeing of children and young people. The Child and Youth Protection Policy is essential to ensure that the organisation properly plans and assess the risks of working with children and young people, and all staff need to subscribe to this policy, as it clarifies the behaviour and protection measures to be taken.

Key issues and concerns arising when working with children

Youth participation is one of the dimensions of EUN programmes, especially of those related to the Digital Citizenship Department but also to other departments at EUN. The active involvement of children and young people are sought in a wide range of activities, such as:

- a) Participation in awareness activities (e.g. campaigns and events).
- b) Development of resources and materials.
- c) Participation in focus groups and decision-making processes.
- d) Peer-to-peer training.
- e) Understanding of youth experiences online.
- f) Conducting school pilots.

³ Desktop research outcomes are available in Annex II.

⁴ These guidelines build on input received from SICs following a survey circulated to all organizations that are part of the national SIC consortium and on further desktop research carried out to identify any resources that can support the development and implementation of such policy.

This line of work therefore inevitably brings along a variety of possible issues and concerns that EUN needs to take into account, which are outlined briefly below.

Recruiting children and young people

EUN adopts different methods of recruiting children and young people for their projects: through its member ministries of education and national agencies, via Safer Internet Centres, directly contacting schools and teachers, advertising on social media or posting information on its websites. In all of these cases, staff need to provide clear, simple and concise information on the project, its focus and on the expected level of the young people's involvement and participation in either face-to-face or online meetings.

In this regard, EUN adheres the following fundamental principles when recruiting children and young people:

- Respecting the dignity and well-being of children and young people.
- Not exposing children and young people to difficult or harmful situations.
- Making sure that children and young people understand that their participation is entirely voluntary and that they can withdraw from the activity at any stage.
- Giving children and young people the right to voice their opinion and to be listened to.

Informing parents or legal guardians

In order to finalise the recruitment, EUN staff inform parents or legal guardians what the project/activity is about, asking for consent for their child's participation and involving them in some of the activities. This procedure applies for both online and offline activities and events.

In the case of offline activities and events when travel is involved, staff need to foresee a chaperone and provide the contact details, in agreement with the parents or legal guardians in case they will not act as the accompanying adult for the child.

Establishing contact with children and young people

Frequently, involvement in activities requires an off- and/or online contact with children and young people. When the participant is a child or young person, EUN must keep the parents or legal guardians informed and meet in a public space where at least another adult or staff member is present. Likewise, if deemed necessary, staff must include a second adult or staff member in any conversation via email.

Collecting, processing and storing personal data

Depending on the nature of the project or activity, personal data of children and young people is collected and kept for a certain period of time. In light of the General Data Protection Regulation (GDPR)⁵, EUN is committed to be compliant when collecting, processing and storing personal data of children and young people. The Regulation stipulates that "*children merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned and their*

⁵ <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=en>

rights in relation to the processing of personal data. Such specific protection should, in particular, apply to the use of personal data of children for the purposes of marketing or creating personality or user profiles and the collection of personal data with regard to children when using services offered directly to a child. The consent of the holder of parental responsibility should not be necessary in the context of preventive or counselling services offered directly to a child."

EUN must clearly define the purpose for which it collects the personal data and has to obtain consent from parents or legal guardians, as well as from the young person themselves, adapting forms to make them child-friendly. In case of minors, the parents or legal guardians need to provide written consent. Likewise, in the case of young persons aged 18 or over, the young person themselves need to provide written consent. Additionally, EUN has to specify the following details:

- a) the type of personal data to be processed;
- b) how long the personal data will be retained;
- c) who will have access to the data;
- d) appropriate safeguards for protecting the information provided;
- e) to whom complaints can be addressed.

A procedure for deleting personal data must be in place to ensure that the information collected is securely destroyed after the lapse of time or when the data subject requests it.

Discussing sensitive issues with children and young people

It is important to raise awareness and understand the sensitivity of certain situations and issues such as online safety for example. Hence, EUN strives to raise awareness of emerging online trends, as well as ultimately empowering children and young people to becoming conscious, active and responsible digital citizens. Online safety covers a variety of topics, from protection of personal data and privacy to cyberbullying, sexting and online hate speech. Obviously, some of these topics are more sensitive and require young people to be able to openly talk about personal experiences, and even disclose information about their online activity and that of their friends. Consequently, EUN staff have to be conscious of the various sensitivities around the topics discussed, to create a relationship based on mutual trust and confidence. In as much as possible, prior preparation and training of children and young people is advisable when embarking on discussions about sensitive issues.

Ensuring the safety and wellbeing of children and young people

EUN and its staff are responsible for the safety and wellbeing of the participants to their initiatives and need to guarantee that all safeguarding measures to protect them have been taken. As such, staff need to be properly trained and briefed on how to ensure that children and young people who participate in activities are safe and protected from any harm or dangerous situations. Additionally, staff need to be knowledgeable of how to respond in case of different scenarios where the safety and wellbeing of children and young people may be at risk. For example, in case of possible abuse, the staff need to act immediately by ensuring, primarily, the wellbeing of the child, by informing the parents or legal guardians and the respective accompanying adults, if it

is safe to do so, and by taking the necessary measures that are required by the organisation's policy and/or by the national law. Among EUN staff there are also former teachers and staff who have worked on the eTwinning⁶ and Better Internet for Kids programmes⁷ who play an important role in training staff and sharing best practice. As set out in the next section, it will be the role of the CPO to raise awareness in the office of the Child Protection Policy (CPO) and to carry out training for staff. The name and contact details of the CPO will be made available to all participants in EUN activities involving children.

In cases where travel is involved, a health form must be distributed to parents or legal guardians to inform the organisers about any medical condition or medication that needs to be administered. Likewise, it is advisable that staff working with children and young people have first aid training to be able to respond quickly in situations of emergency. Staff need to foresee or check that other measures are in place, such as a first aid kit, a readily available list of nearby hospitals or doctors, and a clear overview of emergency exits for the venue of the event.

Media and Communication

Consulting and interviewing children and young people require according skills and certain basic principles should be followed to ensure their dignity and rights are respected:

- **Informed Consent:** In relation to interviews and consultations, informed consent includes explaining what subjects are likely to be covered and clarifying the young person's right to withdraw their consent at any point. The interviewer should review the young person's understanding of consent at the start of the interview/consultation.
- **Provision of support:** There should be someone else present during the interview/consultation, who the young person is familiar with. Wherever possible, the young person should be given a choice regarding who supports him/her during the interview.
- **Respecting the right to say No:** Be clear before you start the interview/consultation that the young person only has to talk if they are comfortable doing so, and they can stop and withdraw their consent at any point.
- **Gender:** Consider the different needs of boys and girls and whether they would be more comfortable to talk to a man or a woman. Gender must be considered when deciding what topics may be discussed.
- **Respecting the right to information:** If you are going to take notes, or record the interview/consultation in another way, you must explain this to the young person and ask their permission to do so.⁸

⁶ <https://www.etwinning.net/en/pub/index.htm>

⁷ <https://www.betterinternetforkids.eu/>

⁸ <https://old.eurochild.org/terms/child-protection-policy/>

Organisational structure and internal measures

Roles, responsibilities and procedures

For each project involving or seeking the participation of children and youth, EUN defines clear roles and responsibilities of all staff involved and especially of those staff members who will work closely with children and young people. This facilitates internal and external communication and contributes to a better coordination of activities with children and young people. Furthermore, the Project Support Team, and more specifically EUN's Internal Auditor, continuously accompany and monitor the implementation of projects and consult staff on matters related to working with children and young people. EUN's Internal Auditor will help when necessary to adapt EUN's standard procedures to specific situations arising within the project.

On Wednesday, 27th January 2021, EUN's management team nominated Nathalie Scheeck as Child Protection Officer (CPO). The CPO's role is to ensure that staff, experts, subcontractors and stakeholders are made fully aware of this safeguarding policy and put it into practice. The CPO acts as the main contact person and advisor for any situations that involve child-safeguarding matters and will be responsible for reporting safeguarding concerns. The name and contact details of the CPO will be prominently displayed in the EUN office and will be made available to all participants in EUN activities involving children and young people.

In some countries, staff working directly with children and young people may need to provide a certificate that proves that they do not have any criminal record or offense that makes them unsuitable to work with vulnerable groups. In Belgium, a criminal record certificate⁹ is issued for people who carry out activity related to education, psycho-medico-social guidance and assistance to youth, childcare, animation or supervision of minors.

Against this background, all EUN staff, experts, inhouse consultants, interns, volunteers, etc. must sign up to the CPP. For those staff specifically working with children and young, EUN has to request a criminal record certificate. Furthermore, a clause to the contracts with subcontractors will be added which confirms that they will abide by the CPP if they will work with children and young people. A similar clause will be added to the conditions of EUN's partnership agreements¹⁰.

Internal training and capacity building

Training is an important aspect of educating staff, building their capacity to work with children and young people, and preparing them to deal with various situations. Additionally, the child protection domain is quite specific with national laws, rules and internal organisational procedures regulating the work with children and young people. Hence, EUN will organise mentoring sessions, training and capacity building activities for staff as a way of improving practice and keeping up to date with changes that may

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https://justice.belgium.be/fr/themes_et_dossiers/documents/demander_des_documents/extrait_de_casier_judiciaire (in French)

¹⁰ This will apply to any contract signed as of 01 January 2021.

occur in legislation and in the child protection environment more generally. Such trainings do not have an established cadence, nonetheless, ad-hoc sessions are organised on a needs basis to update staff or provide induction to new staff. The CPO (see above) will be fully involved in these training sessions.

Assessment of risk

Assessment of risk aims to evaluate those situations that might prove risky for the safety and wellbeing of children and young people and foresee suitable mitigation strategies, and as such, they need to be at the forefront within organisations working with children and young people. For each event or campaign, members of staff must discuss and identify those situations where risk of harm is possible. Each situation must be analysed to assess the seriousness of the risk and based on the results, a strategy proposed to mitigate the risk. Annex II includes a risk assessment matrix that can be adapted based on project needs. The matrix aims to evaluate possible risks, to identify possible scenarios to help with rapid action and solving of the issues and to list a set of guidelines to be considered by all staff in contact with children and young people participating in project activities.

Reporting Procedures

All staff, volunteers and interns should be alert to signs that may suggest a child or young person is in need of help. Deciding whether to report can be a very difficult responsibility. The reporting procedure is made widely available to ensure that everyone is clear what steps to take regarding the safety of children and other witnesses. All witnessed, suspected or alleged violations of European Schoolnet's Child Protection Policy will be immediately reported to the Child Protection Officer (CPO). The CPO will report any safeguarding concerns directly to either the Head of Human Resources, the Internal Auditor or the Executive Director of the Office. The guiding principle here is that the safety of the child is always the most important consideration. These reporting records will be stored securely with access limited to the CPO, the Head of Human Resources, the Internal Auditor or the Executive Director.

Monitor and review the policy

EUN will regularly monitor and review the Child and Youth Protection Policy twelve months after its implementation (from the date of the approval of the Policy by the Management Team). This helps to check if the policy has been well implemented and if staff are fully on board with its provisions. It is also a good time to analyse progress and performance and to identify any lessons learnt that can be integrated into an improved version of the policy. If there is a need to reach all staff, a self-evaluation survey would be a useful tool to collect feedback and suggestions.

Annex I: Risk assessment matrix

Risk assessment for child and youth involvement in project activities

1. Aim of the risk assessment

- a) To identify potential risks that are linked to involving children and young people in project activities.
- b) To come up with possible scenarios to help with rapid action and solving of the issues that may appear while children and young people are physically present at project meetings or travelling.
- c) To list a set of guidelines to be considered by all staff in contact with children and young people participating in project activities.

2. Various situations, risks and precautions to be taken to mitigate potential risks

Description of situation	Hazard/risk	Seriousness of hazard/risk	Strategy to mitigate risk	Contact details of person in charge
Context related to the project activities/needs	What risks can be identified within the context of the project?	Low/Medium/High		
Travel of minor or young person	Will there be an accompanying adult to chaperone the participant?			
Travel of minor or young person	Loss of documents			
Transport/transfers	What are the safety measures needed when local transport/transfer is included?			
Health issues/ medication	Does the participant have any health issues that need to be closely monitored? Does the participant have any health issues that no one is aware of?			

Sickness/accident	Is there anyone trained to provide first aid? Is there information on hospitals or doctors that can be contacted?			
Natural disaster/terrorist attack	Is there a procedure in place in case of such situation? Have the participants been briefed about security issues?			
Increase of terrorist threat level	Is there a possibility for participation to be cancelled?			
Catering	Have all dietary needs been collected and transferred to the catering company?			
Behaviour	Are there clear guidelines for behaviour during the project activities?			
Online events/consultations including adult participation	How to ensure that children's and young people's views will be respected and they will not be talked down to?			

3. Guidelines when working with children and young people

Information:

- a) Inform children, young people, parents and legal guardians of the project, timeframe and their involvement.
- b) Introduce the facilitator(s).
- c) Provide consent forms that parents and legal guardians need to sign.

Video/photo/interviews:

- a) Photo and/or video permission form(s) to be filled out and signed by parent/legal guardian if young person is under 18 years old.
- b) Interviews: background information.

Health-related information:

- a) Contact details of parents/legal guardians and attending physician.

- b) Vaccines.
- c) Allergies and intolerances.
- d) Disease and current medication.
- e) Medical insurance.
- f) In case of intoxication, allergy or intolerance, it is best to provide first aid based on the condition of the child/young person and inform their parents/legal guardian.

Behaviour:

- a) Presentation to include acceptable and unacceptable behaviour (smoking, drinking, leaving without permission, etc.).
- b) Acknowledgement of responsibility of parents/legal guardians/accompanying adults.
- c) Enforcement of countermeasures in case rules are not respected.

Travel:

- a) Travel permission form to be filled out and signed by parent/legal guardian if young person is under 18 years old.
- b) National law of travelling with a minor.
- c) ID/passport screenshot storage for travel purposes.
- d) General personal information storage for travel purposes.

Transport and transfers:

- a) Communicate in advance the name(s) of the person(s) in charge of the group.
- b) List of participants on hand, count them in advance, when getting on the bus or when arriving/leaving the premises.
- c) At least one adult per group of 5-7 children and young people and discuss within the accompanying team how it is best to position themselves within the group (front, middle and back).
- d) Tickets, maps of the city/neighbourhood, emergency phone number of the person(s) in charge.

General safety:

- a) First contact person: accompanying adult.
- b) Second contact person: person(s) in charge of the group.
- c) Lost and stolen property.
- d) Security exits.
- e) Allergies and intolerances acknowledged; food to be chosen carefully.
- f) Contact details of doctor or nearby hospitals.

Staff in charge:

- a) Experience in working with children and young people.
- b) Security clearance (if possible): this can be a document from the town hall of residence or police station saying that the person does not have a criminal record.

Annex II: Desktop research resources

These guidelines build on the result of a survey of organisations that are part of the Insafe network and desktop research of policies and procedures of organisations that are working with and for children and young people. The following additional resources have been also consulted to develop this Child and Youth Protection Policy:

- Keeping Children Safe:
<https://www.keepingchildrensafe.org.uk/how-we-keep-children-safe/capacity-building/resources/child-safeguarding-standards-and-how-implement>
- Oak Foundation: <http://oakfnd.org>
- The Diana Award: <https://diana-award.org.uk/>
- European School Brussels II – Child Protection Policy:
http://www.eeb2.eu/site/files/information/Child_protection_policy_nov_2011.pdf
- British Council – Global Policy Statement on Child Protection:
http://www.britishcouncil.be/sites/default/files/child_protection_global_policy_statement.pdf
- Plan International EU Office – Global Policy on Safeguarding Children and Young People:
<https://plan-international.org/publications/plan-internationals-child-protection-policy>
- Children's International Summer Villages (today known as CISV International) – What About Child Protection?: <http://www.cisv.be/about-us/faq/faq-about-cisv/what-about-child-protection/>
- Inclusion Europe - Child Protection Policy and Procedures: <http://www.childrights4all.eu/wp-content/uploads/2015/01/Inclusion-Europe-Child-Protection-Policy-and-Procedures.pdf>
- Eurochild – Child Protection Policy:
https://old.eurochild.org/fileadmin/public/05_Library/Thematic_priorities/05_Child_Participation/Eurochild/I5_Eurochild_Child_Protection_Policy.pdf

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