



## Child Protection Policy NEW EUROPE FOUNDATION

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## Part 1 INTRODUCTION

### Preamble

At New Europe Foundation, we put the safety and well-being of children at the forefront of our activities. We recognize that protecting the young is not only our duty, but a priority that guides our values and mission. Our Child Protection Policy reflects this commitment, underscoring our determination to provide an environment free from violence, neglect and discrimination.

We assume that a key role in protecting children is played not only by proper procedures and practices, but also by a culture of respect and vigilance among all members of our community. We strive to ensure that every child we deal with feels safe and is treated with the utmost care.

Our activities and initiatives are aimed not only at protecting children, but also at promoting their rights and supporting their development. At New Europe Foundation, we understand that child protection is an ongoing process that requires our continued commitment, reflection and willingness to learn.

### About New Europe Foundation

New Europe Foundation has specialized in modern and innovative non-formal education since 2015. It is a leading organization in Silesia, Poland implementing international cultural, social, environmental and youth projects. Its core activities focus on training young people, including youth at risk of exclusion in improving skills in various fields.

At NEF, we are committed to creating an environment where every child feels safe and protected. We understand that youth are not only the future of our communities, but also the most dynamic force for change. Through our actions, we aim not only to protect children, but also to enable them to thrive in a safe, supportive environment that promotes equality, inclusion and active participation.

#### The foundation's goals include:

- Use of non-formal education in the implementation of activities;
- Raising awareness among the younger community about digital transformation;
- Strengthening civic attitudes among young people;
- Strengthening common European values;
- Involving volunteers in as many project activities as possible;
- Promoting gender equality, equal opportunities and equal access, inclusion in all activities;



- Developing scientific, cultural, political and social contacts between representatives of different countries.

**We achieve our goals through:**

- Conducting education and training activities;
- Promoting non-formal and informal education;
- Disseminating knowledge about other cultures, customs and traditions;
- Disseminating knowledge on topics related to expanding skills.

### **Objectives of the Child Protection Policy**

The purpose of New Europe Foundation's Child Protection Policy is to safeguard young participants in our projects from harm. This applies to the behavior of our employees, collaborators and those participating as beneficiaries, as well as to the processes of preparing and implementing our initiatives.

**Our guidelines and standards are designed to:**

- react quickly to situations where a child's health or life may be at risk;
- Introduce educational and preventive measures to ensure children's safety;
- Build awareness among all those associated with the Foundation about the importance of protecting children,
- determine who in the Foundation is responsible for the safety of young participants;
- Promote a work culture that respects children's rights and strives for their continuous improvement.

This policy applies to every employee, associate, volunteer, partner and grantee of New Europe Foundation. We expect everyone associated with the Foundation to read and apply this policy, which is both our moral and professional obligation.

Adopting and applying the Child Protection Policy is key to creating a safe environment for the children we interact with, demonstrating our understanding and commitment to protecting them from all forms of harm. This is a fundamental aspect of the work of everyone who works with New Europe Foundation.

### **Harming children**

Child abuse is a social phenomenon that takes many forms and affects children around the world, regardless of their socioeconomic background, culture or country of residence. It is a serious violation of children's rights that leaves lasting marks on both the physical and psychological spheres of young people. Understanding the

diversity of forms of child abuse is key to effectively protecting and supporting victims and preventing further abuse.

There are **4 types of violence** against children:

**Physical violence:** refers to any action that causes physical pain or suffering to a child, or may lead to damage to health, including hitting, jerking, burning, or other forms of physical aggression. Physical violence is a deliberate act intended to hurt or punish a child.

**Mental (emotional) abuse:** are actions or inactions that negatively affect a child's emotional development, self-esteem, or safety. This includes threats, constant criticism, humiliation, isolation, rejection, or other forms of psychological abuse that can lead to disruptions in a child's emotional or psychological development.

**Sexual abuse:** any form of involving a child in sexual activities for which he or she is not fully capable of giving informed consent due to his or her age or understanding. This includes both physical contact and non-contact activities, such as exposure to pornographic material, solicitation of sexual behavior through the Internet, or other forms of sexual abuse.

**Neglect:** a situation in which a legal guardian fails to meet a child's basic needs, including emotional, physical, educational or health needs. Neglect can range from lack of adequate medical care, failure to provide adequate nutrition, clothing, failure to provide access to education, to emotional neglect, which is the lack of emotional support, love and a sense of security.

### **Explanation of basic concepts**

**Foundation** - New Europe Foundation

**A child - according to the UN** Convention on the Rights of the Child and for the purposes of this global policy - is defined as any person - girl, boy, young woman, young man and children of other gender identities - **under the age of 18** (Article 1 of the UN Convention on the Rights of the Child).

**Legal guardian of the child** - the guardian is the parent(s) with full parental rights or a legal guardian with the right to represent the child.

**An employee of the Foundation** is a person employed by the Foundation under an employment contract.



**An associate of the Foundation** is a person who is employed under a civil law contract or who performs unpaid work for the Foundation as part of an internship program under an internship agreement, a contract volunteer, internship or other cooperative agreement.

**Consent of the child's legal guardian** means the consent of the person entitled to represent the child, in particular, his legal representative (parent, legal guardian) or other person entitled to representation under specific legislation or court decision. In the case of parents, it means the consent of one of them. If there is no agreement between the parents of the child, the case shall be decided by the court.

## **Part 2. principles of providing assistance**

### **General principles**

The organization's employees are knowledgeable and pay attention to the risk factors of child abuse as part of their duties. Employees and colleagues constantly monitor the situation and welfare of the child.

The communication practices of the Foundation's staff, associates and volunteers are based on a deep respect for the child's individuality, dignity and rights, paying particular attention to the child's right to protection from harm. All communication with the child is undertaken with respect for the child's right to privacy.

In the event that the child himself starts a private conversation using social media, the employee/co-worker shall not continue the conversation and shall instruct the child to report to her/him at his/her place of work or using official remote communication channels. This rule does not apply to situations of (even potential) danger to the child's life and health. In such a case, the employee/co-worker may continue the conversation, but at the same time is obliged to notify the supervisor or the organization's management about the contact with the child and the reasons for this contact.

Involving a child in all activities organized by the Foundation is done after obtaining the consent of the child and his legal guardians. All interactions with children by staff, associates and volunteers require the children's consent. The same representatives of the Foundation provide clear information to both parents and children about the types of support that are available and what the child can expect during their activities within the Foundation. Messages to children are tailored to their age and level of understanding.

If risk factors are identified, the organization's employees/co-workers who are in direct contact with the child/family engage in a conversation with the parents, providing information on available support and motivating them to seek help for themselves. If risk factors are identified within the organization, employees and co-workers communicate this information to the organization's management.

The Foundation ensures that all initiatives, policies and processes regarding the protection of children and young people meet the criteria of equality and non-discrimination. It is recognized that girls, boys, young women and young men, as well as children and adolescents who identify with different gender identities, may face a variety of risks regarding their safety and security.

In our actions, we ensure that every child and young person is equally protected and treated regardless of their age, gender, gender identity, sexual orientation, nationality, ethnicity, color, race, language, religious or political beliefs, marital status, disability, physical or mental health, family background, socioeconomic or cultural status.

Employees and co-workers are required to relate to children and youth using inclusive language to show respect for the child's individuality, different beliefs, different experiences, different perspective resulting from being a child. Employees and associates are required to use language that is devoid of judgments, labels, and adapted to the child's developmental level. At the Foundation, we foster a culture of openness and mutual accountability conducive to raising and discussing any child protection issues and concerns.

### **Principles of a safe employee/co-worker-child relationship**

Employees and associates of New Europe Foundation are prohibited from performing the following activities with children:

- any action that causes children to feel embarrassed, humiliated, lowered in rank or humiliated, as well as behavior that is emotionally violent, physically abusive or sexually exploitative,
- maintaining contact with children through private communication channels without the knowledge of their legal guardians, in particular, having private conversations with children using social media,
- Inappropriate touch towards the child, which may offend his dignity,
- condoning or participating in illegal activities involving the child,
- consent to the consumption or provision of alcohol, drugs or other consciousness-altering substances to children,
- Presenting behavior with sexual overtones,
- Interacting of a sexual nature with children,
- Hosting a child in their own home,
- escorting or being with a child on a trip without the child's guardian present,
- Sharing a room with a child during an away workshop.

### **Protection of the child's image and personal data**

Within our New Europe Foundation, where children and young people are involved in a variety of workshops and activities, the protection of their image and personal data is a priority. We apply a comprehensive set of policies and procedures for the protection of participants' personal data and images, in accordance with applicable regulations, which all employees, associates and volunteers of our Foundation are required to follow.

Our activities are based on regulations from the Data Protection Act of May 10, 2019 and the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016, known as the General Data Protection Regulation (GDPR). These regulations provide the legal basis for the safe processing and protection of the personal data of participants in our initiatives, ensuring their protection in accordance with EU standards and the principle of data minimization, i.e. we process only the data necessary to achieve the objectives of the Foundation.

Before we publish any visual material involving children, we obtain written consent from their legal guardians. This consent is detailed and includes information about the context of the use of the material, the place of publication and the period for which it is given.

In the Foundation's publications, we try, wherever possible, to preserve the anonymity of children, for example, by withholding full personal information or using visual methods to protect their identities.

Photographs and other visual materials documenting children's participation in activities are taken only with the Foundation's service equipment and always with respect for the dignity of the child - without exposure to inappropriate poses or clothing, thus preventing any form of abuse. Our goal is to guarantee that no image or story recorded will expose a child to the risk of harm.

### **Principles of safe access to the Internet as part of the Foundation's activities**

When conducting projects, workshops and other activities organized by the New Europe Foundation, any devices such as tablets used by children, as well as available Wi-Fi networks in our offices, are equipped with special security measures. The purpose of these measures is to prevent access to inappropriate content, including material with nudity or violence, in order to create a safe educational environment. In addition, the Foundation regularly updates the installed security software to effectively protect children from content that may threaten their proper development.

Children use Foundation-owned devices only under the supervision of a Foundation employee or associate. If a child encounters harmful content while using electronic devices provided by the Foundation or using a public Wi-Fi network belonging to the Foundation, the employee or co-worker shall immediately report this to the



Child Protection Policy Coordinator. Thereafter, the Coordinator shall take appropriate steps, including informing the child's legal guardian of the incident.

### **Education and training activities for employees and associates**

At New Europe Foundation, all employees and associates receive training on the organization's Child Protection Policy, with particular emphasis on procedures for reporting suspected child abuse. Children participating in programs offered by the Foundation also have the opportunity to receive training in this area.

Attendance of employees and co-workers at child protection training is recorded by signing the attendance list. Upon completion of the training, the attendance list is immediately forwarded to the person responsible for the implementation of the Policy, i.e. the Child Protection Policy Coordinator, who is also the person who conducts these trainings.

At least once a year, the Foundation organizes educational programs for its employees and associates or provides access to internal training. Led by the Child Protection Policy Coordinator, these trainings focus on preventing child abuse and providing support to children in cases where abuse is suspected.

### **Recruitment of new employees and associates of the Foundation**

The Foundation is committed to hiring individuals who are not only qualified and skilled to work with and are safe for children, but also share the values of the Convention on the Rights of the Child, with particular emphasis on the child's right to protection from all harm. To confirm these conditions, the Foundation may require information from candidates about their education, professional qualifications, employment history and, if possible, references. Candidates are already informed during interviews about the Foundation's Child Protection Policy.

During the recruitment process for positions that have contact with children, candidates are verified for possible entries in the Sex Offender Registry. In addition, they are required to provide statements that they have no criminal record for offenses against minors and no criminal proceedings against them. The Foundation keeps documentation confirming the candidate's check in the Sexual Offender Registry, and copies of such information are attached to the employees' personnel files or relevant documentation (for example, personnel folders) in the case of associates. Statements of no criminal record and no criminal proceedings are kept in a similar manner.

Newly hired employees and co-workers are trained in the Child Protection Policy, as well as knowledge of children's rights and personal data protection by the Child Protection Policy Coordinator. They are also acquainted with the Foundation's detailed work procedures, child rights policies, and personal data protection





and processing procedures. Familiarization with and acceptance of these rules is confirmed by signature on the appropriate statement included in the employment document.

## **Part 3 INTERVENTION IN THE CASE OF A CHILD CRIMINALITY**

### **Procedures for reporting suspected child abuse**

At New Europe Foundation, all employees and associates are committed to actively working to protect children from harm of any kind, guided by the laws of the country. Regardless of where the information comes from - directly from the child, the child's guardian, a specialist, or as a result of the observation of abuse by another child, guardian, specialist, employee or associate of the foundation - every suspicion is treated with the utmost seriousness and is subject to thorough investigation.

If a child is suspected of being abused, any person associated with the Foundation is required to immediately report the incident to his/her immediate supervisor, the Board of Directors or the Child Protection Policy Coordinator. Reporting to the Policy Officer can be done in person or electronically by sending an email to: [kontakt@neweurope.pl](mailto:kontakt@neweurope.pl). If the situation is reported directly to a supervisor or Board member, communication may also take place directly or by email, directing the message to the individual email address of the addressee. If the report is verbal, the person receiving the report must make an official note and immediately send it, along with any information, to the e-mail address indicated earlier.

The first stage of any intervention is to inform the child's legal guardian of suspected abuse, unless such action threatens the child's welfare.

If a child is in immediate danger of life or health, the person who becomes aware of such a situation should immediately intervene by informing the relevant police services of the danger by phone. All intervention actions are documented and stored in special digital folders using online tools such as Google Drive and saved in an electronic record system.

Individuals involved in the foundation's intervention processes, regardless of their role - whether as a reporter, subject or witness - are required to maintain the confidentiality of all information related to the incident and the child involved.

### **Intervention in case of suspected child abuse by an employee/co-worker**

When information comes in about potential harm to a child by an employee or associate of the Foundation, that person is immediately isolated from all contact with children (not just the potentially harmed one) until the situation is clarified. The Child Protection Policy Coordinator receives notification of the incident and provides the organization with the necessary guidance and recommendations for further action.

The Board conducts in-depth interviews with the child and persons who may have relevant information, both regarding the incident and the child's life context, to best understand the situation and its impact on the child's well-being. The findings of these interviews are recorded and archived.

In addition, the board holds meetings with the child's legal guardians to provide information about the events that have occurred and to discuss the possibility of seeking specialized assistance, offered both by the organization and by external institutions. Details of these meetings are documented and forwarded to the Child Protection Policy Coordinator.

In a situation where a criminal act against a child may have occurred, the Foundation's management shall notify the relevant law enforcement agencies.

In cases of other forms of harm that do not fall within the scope of criminal acts, management investigates the circumstances of the incident, taking into account the accounts of the suspected employee or co-worker, the child, and other witnesses. In situations where the violation of the child's rights is serious, for example, there has been discrimination or a violation of dignity, consideration is given to terminating cooperation with the person guilty of harming or recommending such actions to his direct superiors. If the perpetrator is an employee of an external company, it is suggested to impose a ban on him from entering the facility or consider severing the contract with his employer.

### **Intervention in case of suspected child abuse by other third parties**

When there is a suspicion that a child may be abused by outsiders unrelated to the child's immediate family or custodial environment, the organization implements specific intervention procedures directed at protecting and helping the child. The first step is to thoroughly investigate the report and gather as much data as possible on the situation, allowing a better understanding of the circumstances and determining the most effective strategy for dealing with it.

Prompt action is key to reducing the risk of further damage to the child's well-being. To this end, the Foundation can coordinate with relevant entities, such as social welfare institutions, psychological support centers or police forces, to ensure that the child has a safe space and adequate care. Members of the



organization can also hold dialogues with the child and his relatives to identify the needs of the toddler and develop a joint plan to protect him from recurrence of harm.

Depending on the details and severity of the situation, the organization may decide to implement legal measures, including filing an official complaint with law enforcement agencies, if the actions of bystanders qualify as a criminal act. In such a case, it becomes crucial to cooperate with police officials and other relevant institutions to ensure that those responsible for the damage are properly held accountable.

### **Intervention in case of suspected child abuse by parents/legal guardians**

When the suspicion arises that a child may be abused by his parents or legal guardians, the organization undertakes a series of intervention measures focused on protecting the child's interests. The initial step is to make an initial analysis of the situation to understand the context and seriousness of the allegations made. The next step is to establish a dialogue with the parents or guardians to discuss the situation, always with diplomacy and the overriding goal of the child's welfare.

During discussions with parents or guardians, the priority is to identify appropriate follow-up actions that can incorporate support for the family to address the problems underlying the suspected abuse. The organization may suggest taking advantage of available psychological help, therapy or specialized support, targeting both the needs of the child and the family.

When necessary, the Foundation engages external institutions such as social services, child psychologists or other child protection entities to provide additional assistance and intervention. All steps taken are documented in detail, and decisions are always made in the context of safeguarding and promoting the welfare of the child.

In extreme situations, when direct cooperation with parents or guardians does not work, or when the child's health or life is directly threatened, the organization is obliged to notify the competent judicial authorities or the police. Such a step is considered as a last resort when other methods of solving the problem prove ineffective or when the child's safety is unequivocally at risk.

### **Intervention in case of suspected child abuse by a peer - another child**

When there is suspicion of aggression between children, it is essential to interview the parents or guardians of both the aggressor and the affected child, if the child's stage of mental and physical development allows such interaction. Cooperation with the parents or guardians of the aggressor should focus on the development of a corrective plan for the situation. In turn, in the case of the parents or guardians of the victimized child, a way should be worked out together to ensure the child's protection and safety from further potential threats.

It is also important to carry out measures to clarify whether a child showing aggressive behavior is not himself victimized by parents, guardians, other adults or peers.

When aggression is exhibited by a child aged 13-17, whose behavior may be considered criminal, parental involvement of both parties (perpetrator and victim) and notification of the family court or the police by filing a written report is required.

If, on the other hand, the perpetrator is a person 17 years of age or older and his actions qualify as a crime, it is necessary to inform the relevant law enforcement agencies or the prosecutor's office by means of an official written notification.

#### **Part 4 - IMPLEMENTATION AND MONITORING OF THE POLICY**

New Europe Foundation's Child Protection Policy comes into effect immediately after it is made available in its entirety by the Foundation's Board of Directors on platforms accessible to Foundation employees and associates, and after it is posted on the official website <https://www.neweurope.pl/>.

The Board of Directors of the Foundation delegates the duties of the Child Protection Policy Coordinator, who will be tasked with overseeing the implementation of and compliance with this Policy. His duties include:

- Managing and organizing introductory and recurrent trainings on child protection policies for staff and Foundation partners,
- Conducting surveys every two years to assess the effectiveness, adequacy of the Child Protection Policy and the level of awareness of the Policy among the Foundation's employees and associates,
- Organizing regular consultations with the Foundation's employees and associates.

Based on an analysis of the results of surveys and consultations, which are carried out at least every two years, or more frequently if circumstances or changes in the law regarding the topics covered by the Policy require it, the coordinator may initiate an update of the Policy's regulations. The purpose of such an update is to ensure that the provisions of the Policy are effective and adequate. Proposed modifications are submitted to the Foundation's Board of Directors for approval. In the case of significant changes, the Board of Directors seeks feedback from the Foundation Board before finalizing the decision. Any change to the Policy is always communicated to all employees and associates of the Foundation.