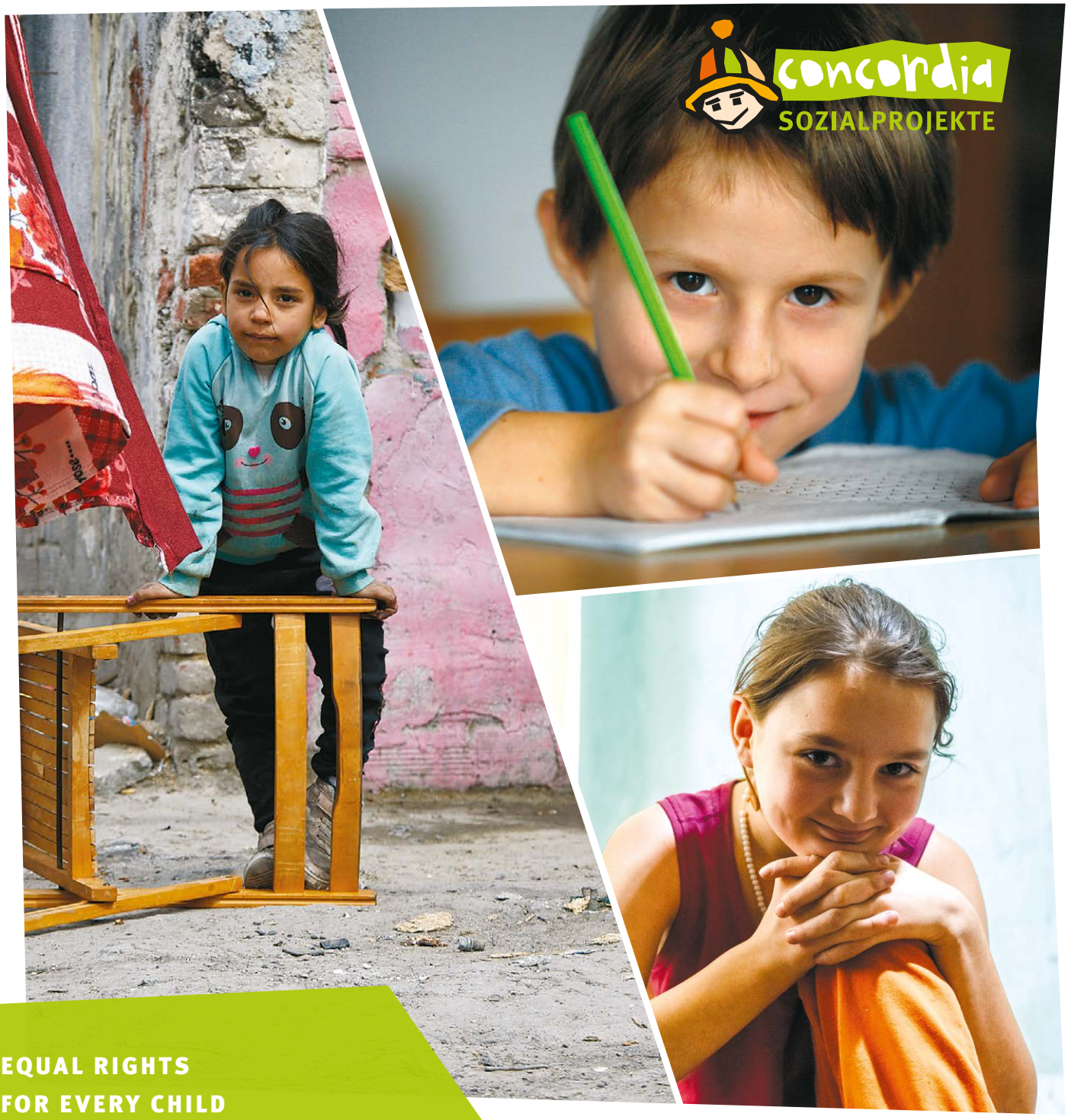


concordia
SOZIALPROJEKTE

EQUAL RIGHTS
FOR EVERY CHILD

CONCORDIA CHILD PROTECTION POLICY

December 2024

Keeping Children Safe
Level 1 Certification 2024

CONCORDIA Sozialprojekte Gemeinnützige Privatstiftung

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" The current document was developed by Mrs. Mirela Lavric and regularly reviewed and updated by Mrs. Martina Raytchinova, under the responsibility of the Programmes and Project Department of CONCORDIA Social Project, with the support of the International Child Safeguarding Team. We express our gratitude to all children, parents, volunteers, colleagues and partners from all CONCORDIA countries, who acted as consultants and who contributed with feedback, views and recommendations.

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FROM THE INTERNATIONAL BOARD

FOREWORD



The CONCORDIA Social Projects International Board is proud to present our Child Protection Policy, a testament to our unwavering commitment to safeguarding the children, young people, and families entrusted to our care. This policy serves as a clear declaration of our dedication to preventing all forms of violence against children while continuously evolving and implementing innovative protective measures to ensure CONCORDIA remains a safe haven for children.

Directed towards all employees, volunteers, supporters, and relevant authorities, this policy outlines our definitions of violence and details the mechanisms we have established to intervene and prevent such occurrences within and beyond our organisation. It provides specific guidelines to ensure that children experience a safe, joyful, and self-determined childhood and adolescence, both within CONCORDIA facilities and in their wider communities.

We are committed to regularly evaluating our protective measures and to ensuring involvement of all CONCORDIA employees in adherence to child safeguarding rules. This policy consolidates the extensive child protection measures already in place, formalising them in writing. The development process included consultations and interviews with the children, adolescents, families, and CONCORDIA employees, reaffirming the importance of this topic within our organisation.

Moreover, this policy addresses the evolving challenges that children face today, including new legislative frameworks like the General Data Protection Regulation and the complexities of social media and the digital environment as a whole. These realities necessitate a thoughtful reassessment and, where needed, a realignment of our existing measures.



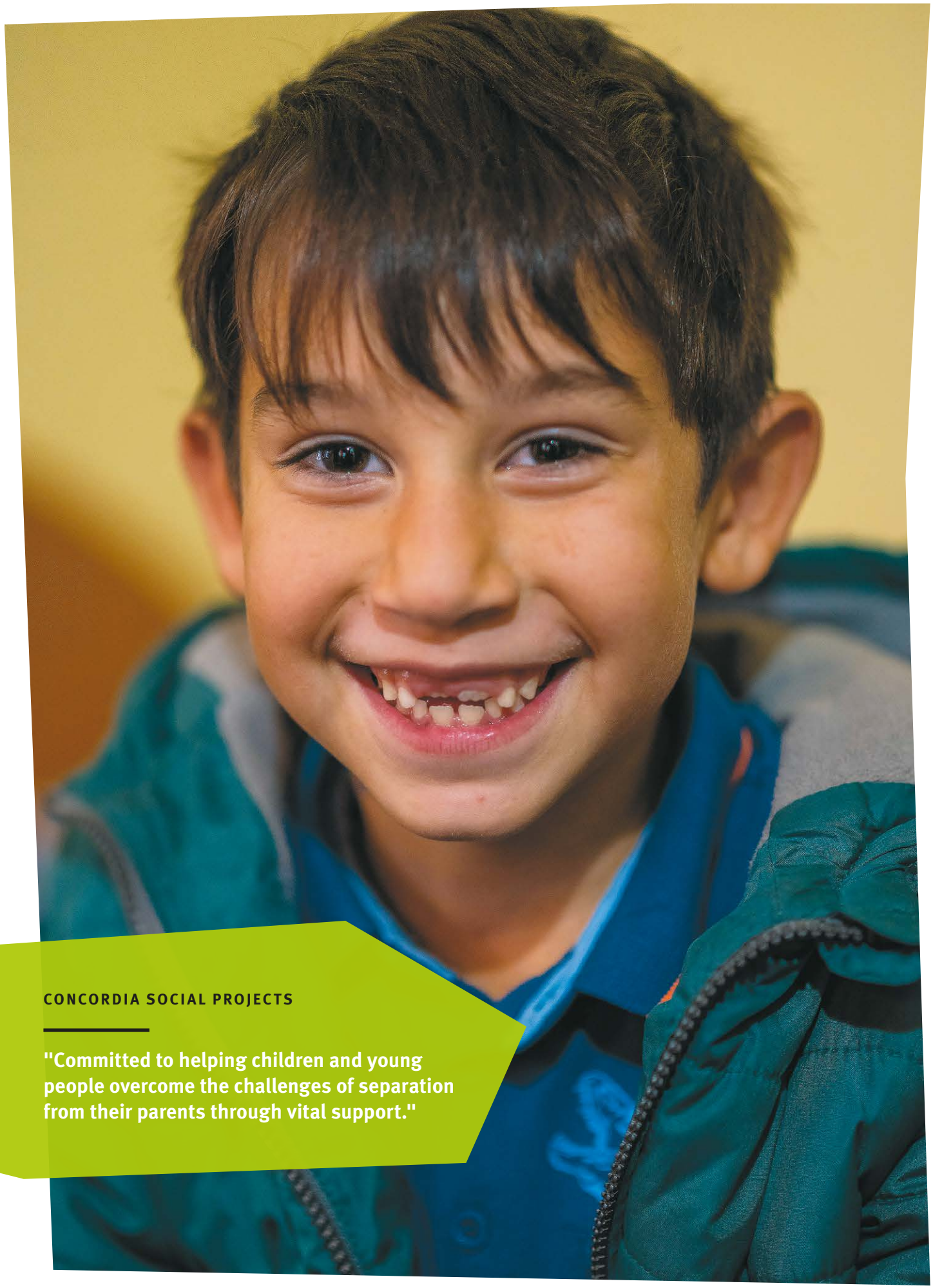
Included in the policy is a specific Code of Conduct and a comprehensive list of actions that CONCORDIA employees must take if they suspect any instances of violence against children. We recognise that protecting the children we work with is our highest priority, demanding ongoing critical reflection and courageous action in our daily work.

We extend our heartfelt gratitude to all CONCORDIA supporters for their invaluable assistance and for respecting our mission. Together, we can create a nurturing environment where every child can thrive.

Ulla Konrad
In the name of
CONCORDIA International Board

“All children have the same rights, no matter who they are, where they live, which language they speak, what their religion is, what they think, what they look like, how they identify, if they have a disability, if they are rich or poor, and no matter who their parents or families are or what their parents or families believe and do. No child should be treated unfairly for any reason.”

United Nations Convention on the Rights of the Child



CONCORDIA SOCIAL PROJECTS

"Committed to helping children and young people overcome the challenges of separation from their parents through vital support."

1.

CONCORDIA SOCIAL PROJECTS

INTRODUCTION

1.1.

ABOUT CONCORDIA SOCIAL PROJECTS

CONCORDIA Social Projects (hereafter referred to as CONCORDIA) is an international, independent, nongovernmental organisation present in Austria, Bulgaria, Kosovo, Romania, the Republic of Moldova, Germany and Switzerland. The national offices in each country provide social and educational services dedicated to supporting children, young people and families in need on their way to an independent and responsible life. CONCORDIA serves diverse target groups by offering a range of services designed to support families at risk and prevent family separation and early school drop-out. Through our day centres and outreach community initiatives, we provide essential resources and assistance to help families navigate challenges and foster stability within their households. Our holistic approach focuses on strengthening familial bonds and promoting well-being, ensuring that vulnerable families receive the support they need to thrive in their communities.

We provide vital support to children and young people who are separated from their families for various reasons, ensuring they have access to a safe and nurturing family environment through our family-like services. These services are designed to create a sense of belonging and stability, helping children thrive in a supportive setting while addressing their emotional and developmental needs.

Through our crisis centres, CONCORDIA provides safe housing and emergency support for children and mothers with young children who have experienced abuse. We also focus on empowering teenagers and young people by enhancing their educational and life skills. Our services include vocational centres, life skills development programmes, and transitional supervised apartments, all aimed at fostering self-determined living.

OUR MISSION AND VISION

- CONCORDIA is an international, independent aid organisation dedicated to helping children, young people and families in need.
- CONCORDIA accompanies children and young people on their journey towards a self-determined life. We create chances through education and vocational training and we help young people to obtain the necessary skills for independent life in dignity and outside of marginalisation.
- CONCORDIA activities contribute to fighting the circle of intergenerational child poverty. We go where the need is the greatest.
- We orient ourselves towards our core values which are entrenched in all organisational policies: heart connection, commitment, courage and chance.
- CONCORDIA is guided by the International Conventions on Children's and Human Rights and by the European Child Guarantee. We contribute to creating an open, resilient and united society.





1.2.

CONCORDIA STATEMENT ON CHILD PROTECTION

The protection of children from all forms of violence is a fundamental right enshrined in the Convention on the Rights of the Child (CRC)[1] and other international treaties and standards. However, despite national and international efforts, millions of children continue to experience abuse every day – whether at home, at school, in institutions, within their communities, or online. The root causes of violence against children transcend borders, cultures, traditions, and income levels. These causes include the social acceptance of certain forms of violence (such as harmful practices and corporal punishment), discrimination based on factors like age, gender, disability, ethnicity, or religion, and unequal power dynamics between genders and age groups.

Violence against children can manifest in various ways, be inflicted by different people, and occur in diverse environments. Children who are exposed to or witness violence may suffer both short- and long-term harm to their physical, cognitive, social, and emotional well-being. These impacts can last throughout their lives, affect future generations, and contribute to economic challenges and a lower quality of life. Studies also reveal a strong connection between childhood exposure to violence and a higher likelihood of becoming a victim or perpetrator of violence later in life[2]. Consequently, violence against children has wide-ranging implications for society, hindering economic growth and diminishing a country's human and social capital.

In 2015, with the introduction of the **Sustainable Development Goals (SDGs),** the global community pledged to eliminate all forms of violence against children by 2030. The SDGs outline specific targets to track progress toward this objective. Notably, Goal 16, which focuses on fostering just, peaceful, and inclusive societies, includes two targets directly related to violence: Target 16.1, ***"Significantly reduce all forms of violence and related death rates everywhere,"*** and Target 16.2, ***"End abuse, exploitation, trafficking, and all forms of violence and torture against children."***

As adults and professionals, we hold a critical responsibility to prevent child abuse actively. This involves being vigilant and attentive to potential signs of abuse or behavioural changes in children. Recognising these signs early and responding promptly and appropriately is essential in safeguarding children's welfare. Effective training and awareness programs can empower adults to detect these signs and understand how to intervene. By fostering an environment of openness and trust, we can encourage children to speak out about their experiences and ensure they feel safe and supported. CONCORDIA enables children to enjoy a happy and healthy childhood. Its work is anchored in the **United Nations Convention on the Rights of the Child** (UNCRC, 1989). All CONCORDIA organisations stand for and share the common commitment to protect children from all forms of physical, economic and psychological violence, neglect, maltreatment and exploitation, including sexual abuse[3], digital violence and child trafficking. CONCORDIA's work is meant to protect all children's rights as stipulated in the UNCRC, as well as in the national legislation on promoting and respecting children's rights in the countries in which our services are offered. In all actions that we take with and for children, CONCORDIA is committed to safeguarding children and reporting and responding to any alleged abuse, taking the necessary measures as stipulated in the internal national policies and procedures, no matter the source of the referral and the alleged perpetrator. The "do no harm" principle is a central tenet of the philosophy of the organisation.

> ***In CONCORDIA our target is that 100% of the reported child protection cases are investigated and that adequate measures are put in place.***

1.3.

ABOUT THIS DOCUMENT[4]

The Child Protection Policy of CONCORDIA was developed through a bottom-up process and numerous consultations with children, young people, family members, co-workers, management staff, volunteers and partners, because we value their opinions, beliefs, feelings and experiences. The policy is rooted in our mission, values, approaches, and services, and thus is to be respected and abided by all employees, volunteers, board members, partners, donors, visitors and service providers, as well as by the children and young people in the organisation. The policy has been developed to ensure the highest standards of professional behaviour and personal practice, so that no harm is done to children and young people during their involvement in activities, projects and programs within the organisation.

THE FOUR CORE VALUES OF CONCORDIA

HEART CONNECTION

We connect from heart to heart.



COURAGE

We are determinded to go where the need is greatest.



COMMITMENT

People can trust our commitment.



CHANGES

We give hope by increasing chances.



2.

PRINCIPLES

PRINCIPLES UNDERPINNING CONCORDIA'S CHILD PROTECTION POLICY

Child safeguarding is a fundamental responsibility for any organisation working with or around children. It involves establishing and maintaining a safe environment where children are shielded from harm, abuse, or exploitation. This requires organisations to take proactive steps to ensure that their staff, operations, and programmes are structured to prevent exposing children to any risks. Additionally, safeguarding extends to monitoring the safety and well-being of children within the communities they serve, ensuring that any concerns or suspicions of harm are swiftly reported to the appropriate authorities. By fostering a culture of vigilance, accountability, and care, organisations uphold the protection and rights of every child they engage with as a top priority.

"Do no harm" is a principle that has been used in the humanitarian sector but can equally be applied to the development field. It refers to organisations' responsibility to minimise the harm they may be doing inadvertently as a result of their organisational activities.[5]

THE FOLLOWING PRINCIPLES ARE THE FOUNDATION OF THIS POLICY:

- All children and young people involved in our activities, projects and programmes have equal rights to protection from any form of violence, and their best interest and well-being are always considered.
- All children and young people are informed about their rights and their responsibilities towards others.
- All children and young people are actively involved in decisions that impact their lives, with their opinions treated as a key priority.
- We honour and respect every child, considering their individual culture, religion, identity and ethnicity.
- We collaborate closely with authorities, external specialist, schools, kindergartens, and other NGOs to provide comprehensive support for children. These partnerships are based on trust, transparency, and long-term cooperation. We expect all our partners to adhere to a strict *"do no harm"* approach to ensure the safety and well-being of every child.



3.

THE GOALS

THE GOALS OF THE CHILD PROTECTION POLICY



CONCORDIA works with vulnerable children and young people, and in all our activities and decisions taken we approach the best interest of the child as the main point of reference. The services we provide for children in the national organisations are functioning according to the national legal provisions.

THE GOALS OF THE POLICY ARE:

- To safeguard children by preventing instances of abuse.
- To assure that 100% of the cases are investigated, adequate measures are put in place and the safety of the involved parties is secured; All cases will have a systematic follow up until they are closed.
- To ensure that staff and volunteers are well-trained and informed in ethical conduct towards children, to prevent violations of children's rights, to recognise signs of abuse, and to promptly report any concerns.
- To uphold towards for children's rights and to ensure a safe and trustworthy environment by all individuals collaborating with CONCORDIA, including Board members, consultants, contractors, partners, sponsors, donors, guests, visitors, journalists, facilitators, and accompanying persons.
- To ensure that all CONCORDIA programme participants are informed about their rights and encouraged to maintain appropriate behaviour towards their peers, colleagues, volunteers, and family members.
- To be a child-safe organisation dedicated to preventing child abuse, while providing parents, donors, and the general public with assurance of the quality, effectiveness, and accountability of our work.
- To ensure that any case of violence or abuse against children, whether suspected or confirmed, is reported immediately and investigated.
- To establish and maintain reliable reporting and feedback mechanisms to prevent any form of harm to children both within and outside the organisation

> ***The Child Protection Policy complements all existing policies and procedures of our organisation and is supported by a comprehensive CONCORDIA Child Protection Policy Operational Manual, which serves as a key guidance document for implementing the policy in practice.***

4.

CONVENTIONS, GUIDELINES AND LAWS

RELEVANT LEGISLATION

CONCORDIA'S CHILD PROTECTION POLICY IS BASED ON THE FOLLOWING CONVENTIONS, GUIDELINES AND LAWS:

- United Nations Convention on the Rights of the Child, 1989[6]
- The standards on child protection as defined by the Keeping Children Safe Coalition, 2014
- United Nations Statement for the Elimination of Sexual Abuse and Exploitation, 2017
- United Nations Guidelines for the Alternative Care of Children, 2010
- European Commission, European Agenda on Migration, 2015
- The Council of Europe Convention on Protection of Children against Sexual Exploitation and Sexual Abuse, also known as "the Lanzarote Convention", 2007
- National legislation on children's rights from Austria, Bulgaria, Kosovo, Moldova and Romania



- The UN Convention on elimination of all forms of discrimination against women (CEDAW). It doesn't directly cover protecting children from violence but emphasises eliminating discrimination against women in family matters, prioritising children's best interests; General Recommendation No.35 emphasises considering women's and children's rights to life and integrity and prioritising the best interest of the child in legal proceedings involving perpetrators' rights.

- Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention). It is the first legally binding European instrument to combat violence against women and girls which recognises children as victims of domestic violence, mandates public awareness campaigns on various violence forms impacting children, requires specialised support services for women victims and their children, stipulates protective measures for children who witness violence, and urges consideration of the impact of violence in custody determinations, ensuring safety assessments and managing risks related to repeated violence, including assessing the perpetrator's access to firearms.

- The Charter of Fundamental Rights of the EU. It mandates protection and care for children's wellbeing, emphasising their right to be heard and have their views considered based on their age and maturity, while also prioritising the best interest of the child in all actions concerning children's rights.

- EU Victims' Rights Directive (Directive 2012/29/EU). It ensures rights and protection for all crime victims, specifically acknowledging the needs of those, who have experienced gender-based violence and child victims; it mandates the right of children to be heard in criminal proceedings, safeguards their privacy, and presumes that child with experience of violence have specific protection needs due to their vulnerability, encouraging awareness-raising actions in collaboration with civil society organisations to mitigate risks of secondary victimisation, intimidation, and retaliation.

- The EU Directive on combating sexual abuse and sexual exploitation of children and child sexual abuse materials (Directive 2011/92/EU). It focuses on preventing such crimes, establishing minimum rules for defining criminal offenses and penalties for perpetrators, and ensuring protection for child victims to effectively combat and safeguard against sexual abuse and exploitation.

- Council of Europe Strategy on the rights of the child 2022–2027. It emphasises child-friendly justice, urging the adaptation of legal procedures to meet specific children's needs and prevent their re-traumatisation and re-victimisation, highlighting the importance of a framework that prioritises the well-being of children within legal proceedings.



RIGHTS OF THE CHILD

"Child is every human being below the age of 18 years unless, under the law applicable to the child, majority is attained earlier".

5.

PROTECTION OF CHILDREN'S RIGHTS

DEFINITIONS

According to the definition contained in Article 1 of the UN Convention on the Rights of the Child: "Child is every human being below the age of 18 years unless, under the law applicable to the child, majority is attained earlier". This policy also extends to young people over the age of 18 who participate in CONCORDIA services, in accordance with national legislation on the promotion and protection of children's rights.

Violence against children refers to "any deliberate, unwanted and non-essential act, threatened or actual, against a child or against multiple children that results in or has a high likelihood of resulting in death, injury or other forms of physical and psychological suffering. An act refers to the process of doing or performing something. This includes acts of omission, which refer to the failure to perform an act. Such acts can be of different natures, i.e., physical, verbal, non-verbal or sexual"[7].

CONCORDIA defines violence against children as any form of physical and psychological (mental and emotional) harm to children, sexual abuse, neglect, bullying, economic exploitation, exploitation through labour, sexual exploitation, abduction and/or disappearance, risky migration, trafficking, internet violence and grooming, child (sexual) abuse material and source, image-based sexual abuse which includes offline and online non-consensual sharing of real or fake images or videos[8]. It includes violence perpetrated against children by adults (parents and caregivers), as well as peer-to-peer violence. Additionally, it includes children witnessing violence in the media listed above.

Violent discipline at home (in family or in alternative forms of care) is the most common form of violence experienced by children. Many caregivers rely on the use of violent methods, both physical and psychological, to punish unwanted behaviour and encourage desired one. Caregivers do not necessarily use this type of discipline with the deliberate intention of causing harm or injury to the child, but they do it out of anger, frustration, lack of understanding or lack of knowledge of non-violent methods of raising a child.

> ***Child protection is the protection of children from violence, exploitation, abuse and neglect as stipulated in Article 19 of the UNCRC which emphasises that State Parties must have proper laws in place to prohibit violence and to implement administrative, social and educational measures to protect children. In the current context, the term means the duty of the organisation and its employees, collaborators and volunteers to protect children in their care from both, intentional and unintentional harm. Child Protection is part of the entire safeguarding process that an organisation implements to prevent harm to children and to respond in cases of harm.***



6.

WELL-BEING



PREVENTIVE ACTIONS

CONCORDIA is dedicated to creating a safe environment for children and to ensuring their well-being and best interest. A key aspect of our work is focused on raising awareness and prevention to reduce the risk of violence against children from the outset. This policy, along with the procedures outlined in the **CONCORDIA Child Protection Operational Manual** is widely implemented among our staff, volunteers, partners, and children, and is deeply embedded in our organisational culture. To achieve this, CONCORDIA takes a holistic and proactive approach, involving not only our immediate team but extending to everyone who interacts with or has an impact on children in our care. The operational manual offers clear guidelines on safeguarding practices, risk identification, and the necessary steps to address or report potential concerns. It also covers preventive strategies, such as recognising the signs of distress and understanding behavioural indicators that could signal underlying issues, ensuring early intervention.

6.1.

HUMAN RESOURCES

CONCORDIA Child Protection Policy applies to all staff, board members, volunteers and collaborators and short-term or part-time experts, who are linked to the organisation in their quality of employees, representatives of the main decision body, and who are bound by volunteer, civil or service contracts with CONCORDIA.

6.1.1.

CONCORDIA STAFF

CONCORDIA's HR policies introduce specific measures to enforce the principles of the Child Protection Policy at all levels. From the recruitment phase, we emphasise the **zero-tolerance stance** on child abuse, explicitly stating in the job announcement[9].

The **recruitment process** at CONCORDIA is thorough and designed to ensure the highest standards of integrity and suitability for working with children and applies uniformly across all countries.

RECRUITMENT AND SELECTION OF EMPLOYEE'S PROCESS:

- Each CONCORDIA job announcement includes **clear prohibition against child abuse** and features our Code of Conduct in Annex.

- The recruitment process includes a **minimum of two interviews** to ensure a comprehensive assessment of each candidate. The first interview typically focuses on evaluating the candidate's qualifications, experience, and suitability for the role. The second interview delves deeper into the candidate's interpersonal skills, cultural fit, and specific competencies related to the position. Beside the HR specialist, the interview process involves another employee, who understands the role and the mission and structure of the organisation. By conducting at least two interviews, CONCORDIA aims to create a robust selection process that not only identifies the most qualified candidates but also ensures that they possess the necessary qualities to thrive in a child-focused environment. This thorough approach enhances the overall integrity of the recruitment process and helps safeguard the organisation's commitment to child protection.

- The requirement for candidates to submit **three reference letters**[10] from previous employers is a vital component of the recruitment process. These letters serve as an essential tool for assessing a candidate's past performance, work ethic, and suitability for a role that involves working with children. This is to be strictly followed in a case of direct work with the children. If the candidate has held their most recent position for an extended period, the following rule applies: references from employers within the last three years prior to the application are sufficient. However, if the candidate's earlier employment involved work with children, references from those employers should also be included.

- Shortlisted candidates are required to provide a **criminal record certificate**[11] from the court as a crucial part of the recruitment process. This requirement ensures that all potential hires undergo a thorough background check to assess their suitability for roles that involve working with children.

- Every shortlisted candidate must complete and sign a **self-declaration**[12] confirming that they have never been accused of any form of child abuse.

- For positions involving direct work with children, a **mandatory shadowing period** is implemented as an essential part of the onboarding process. This period allows new hires to observe experienced staff members in action, providing them with valuable insights into the organisation's practices, protocols, and child safeguarding measures.

- **Child protection performance indicators** are used to track adherence to regulations by all employees, with these indicators being reviewed every six months.

- During their first six weeks of employment, all new CONCORDIA team members undergo an **intensive onboarding program.** This program includes training on roles and responsibilities, understanding children's needs, recognising signs of abuse, and the reporting mechanisms in place.

- In the event of a violation of the Child Protection Policy or the Code of Conduct, the organisation reserves the right to **terminate the employee's contract** immediately.

- If violence against children occurs, CONCORDIA is required to notify the **appropriate authorities.**

- All new employees and collaborators on civil or service contracts are required to attend a **session on Child Protection Policy** as part of their onboarding period. These sessions are conducted by the National Focal Points of Child Protection.

- Current employees and collaborators participate in **regular information and training sessions** on the Child Protection Policy and the Code of Conduct.

- Any **breach of the Code of Conduct** or any behaviour that contradicts the policy will be investigated, and appropriate measures will be taken in accordance with the HR policy, Rules of Interior and national legislation. Such measures can include penalties, suspension, or dismissal.

CONCORDIA appoints National Focal Points on Child Protection (NFPCP) at each national office to ensure adherence to child protection regulations. NFPCPs serve as the main contacts for questions and concerns regarding the Child Protection Policy (CPP). They conduct onboarding training for new employees and volunteers, maintain comprehensive records, hold regular meetings with the International Child Safeguarding Officer[13], and participate in workshops for updates. Each NFPCP is supported by a fully trained stand-in to cover their responsibilities during their absence. Additionally, each centre has a designated Person of Trust, identified by the children themselves, who is a trusted CONCORDIA employee providing support to those who feel unsafe. The Person of Trust must report any abuse allegations or safety concerns to the NFPCP or their stand-in, who will then oversee the necessary procedures and internal investigations.

6.1.2.
CONCORDIA VOLUNTEERS

CONCORDIA adheres to strict internal guidelines for selecting volunteers, which include requesting criminal and medical records, as well as references from previous employers or teachers. All volunteers are required to read and sign the Code of Conduct and the Child Protection Policy. During their first six weeks, volunteers participate in an intensive onboarding program covering internal roles and responsibilities, children's needs, recognising signs of abuse, and reporting mechanisms. If a volunteer fails to adhere to the Code of Conduct or the policy, CONCORDIA reserves the right to terminate their volunteer contract at any time. Volunteers play a critical role in safeguarding, as they spend the entire day within the services, closely interacting with children, which enables them to observe and report any concerning behaviours or signs of distress.





6.1.3.
BOARD MEMBERS

All CONCORDIA Board members commit to upholding the Child Protection Policy and the Code of Conduct. They hold for overseeing and ensuring the policy's implementation within national organisations. Annually, the Board receives a child protection report prepared by the national management team with support from the NFPCP and reviewed by the International Child Safeguarding Officer. The report's findings lead to the development of an annual child protection action plan, which is monitored quarterly. Additionally, there is a mid-year follow-up report on the reported cases to track their development and the measures taken, ensuring ongoing attention to each case and the effectiveness of the responses implemented.

6.1.4.
AWARENESS RAISING, TRAINING AND SUPERVISION

CONCORDIA ensures that the Child Protection Policy is clearly understood by everyone it applies to. The policy is translated into the languages of all national organisations, including Ukrainian, reflecting CONCORDIA's commitment to accessibility and inclusivity in light of its support for Ukrainian refugees. All new employees, civil and service contractors, short-term or part-time experts, volunteers, and Board members undergo in-depth training on the policy tailored to their specific roles and responsibilities within the first three months of their assignment. At CONCORDIA, we have implemented a strict policy to ensure that new staff do not work directly with children until they have been introduced to and have signed the Child Protection Policy. By signing this declaration, they affirm that, during their engagement with Concordia, they will adhere to all internal regulations. This ensures that everyone is accountable for maintaining the highest standards of child protection.

For existing employees, volunteers, experts, and collaborators, a learning analysis identifies their training needs to effectively implement the policy. Based on this analysis, a comprehensive training curriculum is developed. Employees are expected to understand their roles, responsibilities, and the mechanisms for preventing and responding to child abuse. The organisation also offers a range of capacity-building activities and encourages proactive participation. All capacity-building activities are monitored using standardised templates.

Regular supervision is provided to the child protection team and to staff members, who work directly in the field, to ensure they receive the necessary guidance, support, and professional development. These supervision sessions are designed to offer staff a safe space to reflect on their work, discuss complex cases, and receive feedback on their performance. By fostering open communication and continuous learning, the supervision process helps staff manage the emotional demands of their roles while maintaining high standards of child protection practice. Regular supervision also ensures that staff adhere to organisational policies and procedures and that they are equipped to handle the challenges they face effectively.

A child-friendly[14] version of the policy, created with input from children, is provided alongside a video[15] highlighting children's key rights. These materials are available in the languages of all national organisations.

We raise awareness by ensuring that our child safeguarding mechanisms, reporting instruments, and Code of Conduct are visibly displayed in all CONCORDIA services, including centres and offices. This visibility ensures that children, families, staff, and visitors are constantly reminded of the standards of behaviour expected within the organisation. It also provides clear information on how to report any concerns or violations of children's rights. By prominently displaying this information, we reinforce a culture of accountability and transparency, helping everyone in our care feel protected and informed.

6.2.

BUILDING CHILD-SAFE PROJECTS AND PROGRAMMES

6.2.1. CHILD-FOCUSED APPROACH

Engaging children and young people in processes, activities and decision that concern them is a central characteristic which makes our projects and programmes more effective and responsive to children's individual needs. We promote the participation of children and young people by providing opportunities for them to join children's and youth's councils. These councils empower them to learn how to advocate for themselves and actively engage in decision-making processes that affect their lives.

We expect our staff to observe and engage with children to help mitigate situations where they may feel afraid to discuss incidents of bullying or discrimination affecting themselves or their peers, whether in school or their neighbourhoods.

In this context, we adhere to the **following principles** when working with children, which we consider to strengthen a child-focused approach that actively protects, empowers, and guides children in managing risks, both physical and emotional, and builds a strong, supportive framework around them.

- **The child alone decides about their own body:** Adults must respect children's boundaries and refrain from touching, hugging, kissing, or lifting them without considering their verbal or non-verbal cues and without the child's consent. A child has the right to accept gifts without feeling obligated to hug or kiss the giver in return. It is essential to teach children that they are unique and lovable, and they have the right to make decisions about their own bodies, including the right to say "no" to unwanted touch.

- **The child's feelings are valid and important:** Children should understand that it is normal for them to have feelings that differ from those of their parents, caregivers, other adults, or peers. Recognising and validating their emotions can help them navigate uncomfortable situations without fear of rejection. A crucial step in protecting against sexual abuse is to encourage children to express any unpleasant feelings they may have. Body parts and actions should be named accurately and openly, free from harmful taboos. This approach allows us to recognise and respond appropriately to actions that the child finds disturbing or unpleasant. Additionally, children must be supported in identifying which touches they find pleasant and which they do not.

- **Children have the right to say "no":** children should be encouraged to recognise their needs and to establish their limits in everyday situations. Adults play a crucial role in empowering children to assert these boundaries and ensuring that they are respected, which prepares them to defend themselves against potential threats. It is important to be mindful of circumstances where close physical contact may be uncomfortable but necessary, such as during a medical examination. By learning to set their own boundaries, children also develop the ability to respect the boundaries of others.

- **There are good secrets and bad secrets:** it is essential to teach children the difference between harmless secrets – such as surprises and playful pranks among peers – and harmful secrets involving blackmail and bribery. Children should be encouraged to share any bothering or distressing secrets that they may be holding ensuring they do not feel guilty for doing so.

- **Where to seek help:** children may often find themselves in situations when they feel overwhelmed and unable to cope on their own. Often, they turn to adults who might not take their concerns seriously or believe them. It is essential to encourage children not to give up and to seek support when needed. They should understand that it is their right to ask for help and be informed about where to find it, such as NFPCP or a designated Person of Trust.

- **It's not the child's fault:** Children who experience abuse often carry a sense of guilt instilled by the perpetrator, which can silence them about their traumatic experiences. It is vital to emphasise that the child's best interests should always be the primary consideration in all matters involving or affecting them. In cases of safeguarding concerns, only those individuals who need to know should be involved to protect the child's privacy and well-being.

- **Building Digital Literacy and Online Safety:** Given the risks associated with digital spaces, it is crucial to educate children on internet safety, privacy, and safe online behaviour. Teaching children how to identify and report suspicious activities online, recognise cyberbullying, and understand the importance of keeping personal information private can prevent potential exploitation.

- **Encouraging Peer Support and Positive Social Networks:** Children should be encouraged to build positive relationships with peers. Having supportive friendships can help children feel safer and more resilient, giving them trusted peers to turn to if they feel unsafe. Encouraging peer support groups can also reinforce a culture where children look out for one another and feel comfortable discussing sensitive topics.

- **Teaching Conflict Resolution and Emotional Regulation:** By learning how to manage and express emotions constructively, children can build resilience and develop healthy relationships. Encouraging children to understand and communicate their feelings reduces the risk of acting out due to unprocessed emotions and can help them seek help when needed.

- **Fostering Self-Advocacy Skills:** Empowering children to voice their needs, share their thoughts, and participate in decisions impacting them can boost their confidence in setting and defending boundaries. Self-advocacy skills help children recognise their autonomy and foster a sense of agency, which is vital for long-term emotional well-being and safety.

- **Providing Accessible, Child-Friendly Reporting Channels:** Ensure that children are aware of and can easily access safe, confidential, and non-intimidating ways to report any concerns. This includes having approachable and trained adults, such as NFPCP, readily available and well-publicised for children to approach with confidence.

6.2.2.
RISK ASSESSMENT

CONCORDIA is committed to planning, designing, and delivering projects and programmes that ensure the safety of all children, youth, other programme participants, and employees. During the planning phase of new projects, we conduct needs and risk assessments in collaboration with programme participants and the communities involved. Following this assessment, we implement risk mitigation strategies before making a final decision about establishing a new service. Since the end of 2024, CONCORDIA has developed and implemented a new procedure for risk assessment across all programmes and projects. Potential risks are identified through a participatory approach by organising focus groups with users, parents, and employees. Mitigation strategies are defined in collaboration with responsible persons, and the process includes an annual revision of the risks and evaluation of the measures taken. This new procedure serves as an additional instrument for the prevention of harm to children and to assure that all CONCORDIA facilities meet the "child-friendly spaces" criteria. According to the definition, a child-friendly space should be:

- **H** Healthy
- **A** Accepting
- **P** Protective
- **P** Participatory
- **Y** Youth-Inclusive[16]



Additionally, risk assessments are performed prior to any activity that may pose a risk to children, such as trips or camps or events involving youth participation. If youth are invited to participate in events, we follow a specially developed set of guidelines that outlines key safety measures to be observed throughout the activity. If the identified risks are deemed too high and cannot be effectively mitigated, the project or activity will not proceed, and the management team will make an informed decision accordingly.

6.2.3.
SET-UP OF NEW PROJECTS

When establishing projects, it is essential to engage all stakeholders, including children, families, communities, local authorities, and public decision-making bodies. National standards for social services must be adhered to when they exist and are legally binding. Clear selection criteria and maximum capacity limits for each service should be defined, ensuring no discrimination based on ethnicity, religion, gender, or other factors.

All services and related activities are presented to all programme users, and a comprehensive workshop on rights and responsibilities is conducted. A service contract is signed in accordance with the legal provisions of each country. Written consent from both the child and their parent or legal guardian is required before any new projects or activities begin. Additionally, both the child and their parent/guardian/legal representative are informed about how to report any violations of the child's rights and the potential consequences. This includes providing the organisation's contact information, the designated Person of Trust at each centre, and the details of the National Focal Point for Child Protection.

6.2.4.
PARTNERS

When selecting partners for our projects, we thoroughly assess their history for any past misconduct, reputation, and the existence of an ethical code for employees or a child protection policy. All partnership agreements and service contracts explicitly incorporate ethical standards and obligations related to child safeguarding. If the partnership or contracted services involve direct contact with children, partners must agree to and sign the Child Protection Policy and the Code of Conduct before activities commence. In the event of any allegations regarding incidents or violations of children's rights during the partnership or service implementation, CONCORDIA reserves the right to investigate and terminate the collaboration immediately. This selection process also applies to contractors who deliver short-term services to the organisation, and designated declarations must be signed prior to engagement, including when working with external experts on project evaluations or assessments and for contractors such as food delivery and refurbishment firms.

6.3.

MEDIA AND COMMUNICATION

CONCORDIA is committed to prioritising the safety of its programme participants in all communication activities. Our Child Protection Policy, the International Code of Conduct, and the Visual Storytelling Guidelines[17] underpin this commitment. We ensure the protection of children's images, privacy, and dignity in all communication and fundraising efforts.

Before any footage (photos or videos) of children in our care is produced, a Photo Consent Form must be signed by their parents or legal representatives. At events with media present, parents/legal representatives will be informed in advance about the purpose of the footage. Any images taken for organisational purposes must respect the child's dignity; their real names will not be disclosed in external reports. Children in crisis centre facilities **are not to be photographed under any circumstances.** It is strictly forbidden to share their location, names, school they visit or any other personal data.

In any situation involving journalists, they will be informed of CONCORDIA's internal regulations regarding children's footage and must adhere to the Visual Storytelling Guidelines. All external materials must be approved by the organisation's communication experts and, in some cases, the International Child Safeguarding Officer.

When sharing personal stories of children for communication or fundraising, we emphasise not only the challenges they face but also their strengths and support networks. We do not request children to promote brands in exchange for donations, although they may choose to wear branded items voluntarily without any expectations of receiving donations.

CONCORDIA prohibits employees, board members, volunteers, and visitors from posting unofficial pictures or videos of children on social media. Only official organisational posts may be liked or shared, and tagging children in photos is not permitted. Young people are made aware about the risks of tagging themselves online. Employees must not connect with children or young people using CONCORDIA services on social media, nor exchange personal information or pictures with them. Social media accounts should be utilised to promote internet safety and educate young people on safe digital practices.

6.4.

USE OF INFORMATION TECHNOLOGY

CONCORDIA regulates IT and online safety according to our values and legal requirements. We provide guidance to staff and volunteers as well as to children and youth to ensure appropriate and safe use of information technology, including social media and artificial intelligence (AI). Filters and blocking software are installed on all IT products to ensure that inappropriate/offensive sites, like those representing sexual behaviour or violent content, cannot be accessed via organisation's internet connection by both employees/volunteers and children. Any cases of filtering, illegal use, downloading or creating indecent images of children, cyber-bullying, cyber grooming or use of information technology to abuse a child are forbidden. Such cases will be investigated and measures will be taken against the staff or the volunteers involved.

We recognise that the use of digital tools is very important for children's education and development and we support them with terminals and internet connection. At the same time, we have to safeguard children when they are online. For this reason, we regularly inform them about the risks of internet use, also in terms of what is legal or not, and require from them to report any inappropriate online communication.

We ensure that children are well-informed about the risks associated with using the internet and social media. To achieve this, we regularly conduct awareness-raising activities that engage both children and their parents. These initiatives include workshops, discussions, and informational sessions designed to educate families about online safety, privacy concerns, and the importance of responsible digital behaviour. By fostering open communication and providing practical guidance, we empower children and parents to navigate the online world safely and confidently.

How Artificial Intelligence Can Be Dangerous for Children
Artificial intelligence (AI) poses several risks that experts agree must be addressed, particularly regarding consumer privacy and the reliability of information sources. To minimise these risks for the children and young people CONCORDIA works with, we prioritise raising awareness and delivering regular information sessions.

As a first step, our international IT team developed a basic training curriculum on using AI responsibly and adopting essential safety measures. This training was delivered to all CONCORDIA employees across countries, along with additional sessions for the NFCPC (National Focal Point for Child Protection). These individuals then shared the information with our practitioners and programme participants.

To improve visibility, our IT team is preparing two informational guides summarising the key principles of safe internet use, with a particular focus on social media. These guides will be distributed across all our centres. The main topics include:

Avoid Sharing Personal Information on Social Media
AI-powered tools make it easy to manipulate visual content for inappropriate or harmful purposes, such as creating child sexual abuse materials. Children and young people should exercise caution when sharing anything online.

Beware of Voice-Cloning Technology
AI can now mimic voices convincingly, increasing the risk of scam calls. Scammers may impersonate someone you know or alter voices to sound younger or of a different gender. It is crucial not to share personal information over the phone and to report any suspected scams to your PoT or NFCPC.

Understand the Risks of Profiling and Algorithmic Bubbles
Many applications collect personal data, such as location, interests, and online behaviour, to create "profiles." These profiles can restrict exposure to diverse information by pushing content tailored to previous interactions, creating a "bubble." For example, clicking on weight-loss adverts might result in an overwhelming stream of similar content, potentially promoting unhealthy body images and increasing the risk of eating disorders.
To counter this, always critically evaluate information obtained online, especially on social media platforms like TikTok. Experts identify TikTok as particularly harmful due to its addictive design, endless scrolling, and the spread of misinformation, including the promotion of harmful cultural trends and behaviours.

By educating children, young people, and their caregivers about these risks, we aim to foster safer online environments and promote digital literacy.

Currently, the International Child Safeguarding team is working on developing a comprehensive manual and toolkit on digital safeguarding, which will be delivered by the end of 2025.

Online abuse is any type of abuse that happens on the internet, through social media, online gaming or mobile phones. For more information see Annex 1 of the current document.

6.5.

SOURCES OF FUNDS

CONCORDIA screens its funding sources to ensure compliance with our values. We seek financial support from companies and major donors whose image, behaviour, and products do not harm children, families, or communities. Consequently, we do not accept or pursue funding from companies involved in producing or distributing weapons, tobacco, alcohol, or any products harmful to health or the environment, nor from those associated with child labour, corruption, or money laundering scandals. While CONCORDIA takes care to vet our donors, we cannot be held responsible for receiving donations from companies or foundations that conceal illegal activities not identified through our regular screening of public sources. In instances where a donor's ethical misconduct becomes publicly known, the Board will determine the appropriate course of action.

6.6.

VISITORS

All visits to the organisation must be planned in advance, taking into account the children's schedules. Prior to the visit, visitors should submit a list of names, roles, and affiliated companies to the relevant person, such as the project coordinator, PR officer, or executive director. Visitors will be informed in advance about the activities planned within the services, as well as any specific regulations. They will also be provided with the code of conduct for visitors and service providers and required to acknowledge their understanding and acceptance by signing it.

During the visit, visitors will be accompanied by CONCORDIA staff to ensure adherence to all internal regulations. Visitors are expected to respect the date and time of their planned visit, follow the guidance of the accompanying CONCORDIA staff, and treat children and their families with respect and dignity. They must not exchange contact details or communicate with children outside the project, show favouritism towards any child, or take photographs or videos

of individual children without permission from the family or the organisation. Inappropriate language or behaviour towards children is strictly prohibited, and visitors must avoid labelling or expressing discriminatory views about the children.

Visitors are not permitted to enter private spaces, such as bathrooms or sleeping areas, under any circumstances.

As a general principle, external visits should be limited as much as possible. Personal gifts are banned, and any official in-kind donations must be agreed upon with CONCORDIA staff in advance and documented in writing. Additionally, all external visitors, especially during home visits in communities, must wear a recognisable CONCORDIA insignia to ensure transparency and trust.



FUNDING SOURCES

"We seek financial support from companies and major donors whose image, behaviour, and products do not harm children, families, or communities."

7.

WELL-BEING

ACTIONS

7.1.

REPORTING AND RESPONDING TO CHILD ABUSE ALLEGATIONS

CONCORDIA addresses child abuse allegations by primary focus on the best interest of the child, ensuring their psychological and physical well-being. The first priority is to guarantee the child's safety and provide any necessary immediate support. Any adult who witnesses harmful behaviour towards a child or identifies signs of abuse within our organisation is required to report it to the NFPCP immediately. Each allegation of abuse is thoroughly investigated internally and a reporting mechanism is activated as needed based on the specifics of the case.

The NFPCP is responsible for implementing appropriate measures and, if necessary, contacting national protection and law enforcement authorities without delay. In instances of substantiated abuse, an official investigation is initiated in accordance with national regulations.

We uphold a strict policy of non-retaliation; no punitive actions will be taken against anyone who raises a child protection concern in good faith.

FLOWCHART CONCORDIA REPORTING MECHANISM

IN CASE OF EMERGENCY:

1. Ensure the child's safety
   → Call the local emergency number

   TEL .....

2. → Contact CONCORDIA National Focal Point of Child Protection

   NAME .....

   TEL .....

3. Follow the internal and national regulations relevant to the case

ALLEGED OR CONFIRMED CASES OF ABUSE:

1. Ensure the child is safe and stable

2. → Contact CONCORDIA National Focal Point of Child Protection and await instructions

   NAME .....

   TEL .....

3. → Notify the centre coordinator

   NAME .....

   TEL .....

4. Follow internal regulations relevant to the case

7.2.

ACCOUNTABILITY, MONITORING & REVIEW OF THE OBSERVATION OF THE CHILD PROTECTION POLICY

CONCORDIA is accountable to the programme participants it supports through its diverse social and educational initiatives. We are committed to continuously monitoring and upholding the rights of all children within our services and projects. Our focus is on preventing violations of both internal and external regulations, while ensuring we are prepared to intervene promptly in the event of any suspected or confirmed child safeguarding issues. This commitment is guided by our policy, as well as relevant national and international laws and regulations. The national and international directors are responsible for upholding child protection principle within the organisation and for implementing the Child Protection Policy across their respective areas of responsibility. Annually, the International Child Safeguarding Officer presents comprehensive report to the International Board.

This report encompasses all child protection matters across the CONCORDIA national organisations and includes statistics on allegations of abuse, incidents of harm to children, types of abuse identified, the number of confirmed allegations, measures taken to restore the child safety and well-being, and types of measures imposed. Following this annual report, a mid-year follow-up report is provided on all opened cases.

The Child Protection Policy will be reviewed every three to five years or whenever changes in national or international legal frameworks impact its provisions. The revised policy must be approved by all Country Directors and by the Board. The review process will incorporate lessons learned and feedback from children, staff, volunteers, stakeholders, and partners involved in our work with children. Initiated by the International Child Safeguarding Officer and overseen by the National Programme Directors, the review is coordinated by the National Focal Points for Child Protection and includes input from programme, communication, and fundraising staff across all national organisations. Training on each new process will be provided by the NFPCP.

8.

CODE OF ETHICS

CODE OF CONDUCT

All CONCORDIA entities adhere to a code of ethics in providing services for children, as mandated by the law[18]. In addition, a comprehensive Code of Conduct has been developed to guide employees in maintaining appropriate and expected behaviours towards children. Separate versions of this code are tailored for volunteers, collaborators, and visitors, as well as a child-friendly version for children. Furthermore, CONCORDIA has established guidelines to address the behaviours of children toward one another, recognising that children can also be held accountable under certain national laws[19]. The Code of Conduct aims to raise awareness among CONCORDIA staff and partners about the importance of our organisational values, internal regulations, and standards. Violations of the Child Protection Policy and the Code of Conduct will result in disciplinary action for employees, and may involve regulations or termination of contracts as per labour and civil laws.

In cases of serious child safeguarding allegations, we will promptly notify law enforcement authorities to take appropriate legal action. The Code of Conduct[20] is translated into all relevant working languages and printed in written form. All employees, Board members, and volunteers must be made aware of it and sign it to demonstrate their commitment to its content. The HR responsible person or/and the NFPCP will provide necessary support to ensure understanding of the document. Additionally, the Code of Conduct aims to protect staff and other adults involved in the organisation's operations, offering support when needed. Both, the organisational Code of Conduct and its child-friendly version are published on the international and national CONCORDIA websites to enhance visibility.



CHILD PROTECTION COMMITMENT

"CONCORDIA is committed to safe-guarding children's rights, ensuring compliance, and taking prompt action on child protection issues."

9.

STATEMENT OF COMMITMENT

APPENDICES

9.1.

STATEMENT OF COMMITMENT TO CONCORDIA CHILD PROTECTION POLICY

I, ...,
have read and understood the standards and guidelines outlined in this Child Protection Policy.

I agree with the principles contained therein and accept the importance of implementing and promoting the child protection policies and practices contained within this document in my quality of

- O employee
- O volunteer
- O collaborator
- O board member
- O partner
- O service provider

while working or associated with CONCORDIA.

....

Name Job title/role

....

Signature Date

9.2.

ANNEX 1: DEFINITIONS AND RECOGNISING SIGNS OF ABUSE

TYPES OF ABUSE

PHYSICAL ABUSE

is deliberately causing physical harm to a child by a person in a position of responsibility, power or trust. This might involve punching, hitting, kicking, biting, burning, scalding, shaking, throwing or beating with objects such as belts, whips, or sticks. It also includes poisoning, giving a child alcohol or illegal drugs, drowning or suffocation.

PSYCHOLOGICAL ABUSE

includes both emotional and mental abuse. Emotional abuse impairs child's emotional development, while mental abuse impairs child's intellectual development.

EMOTIONAL ABUSE

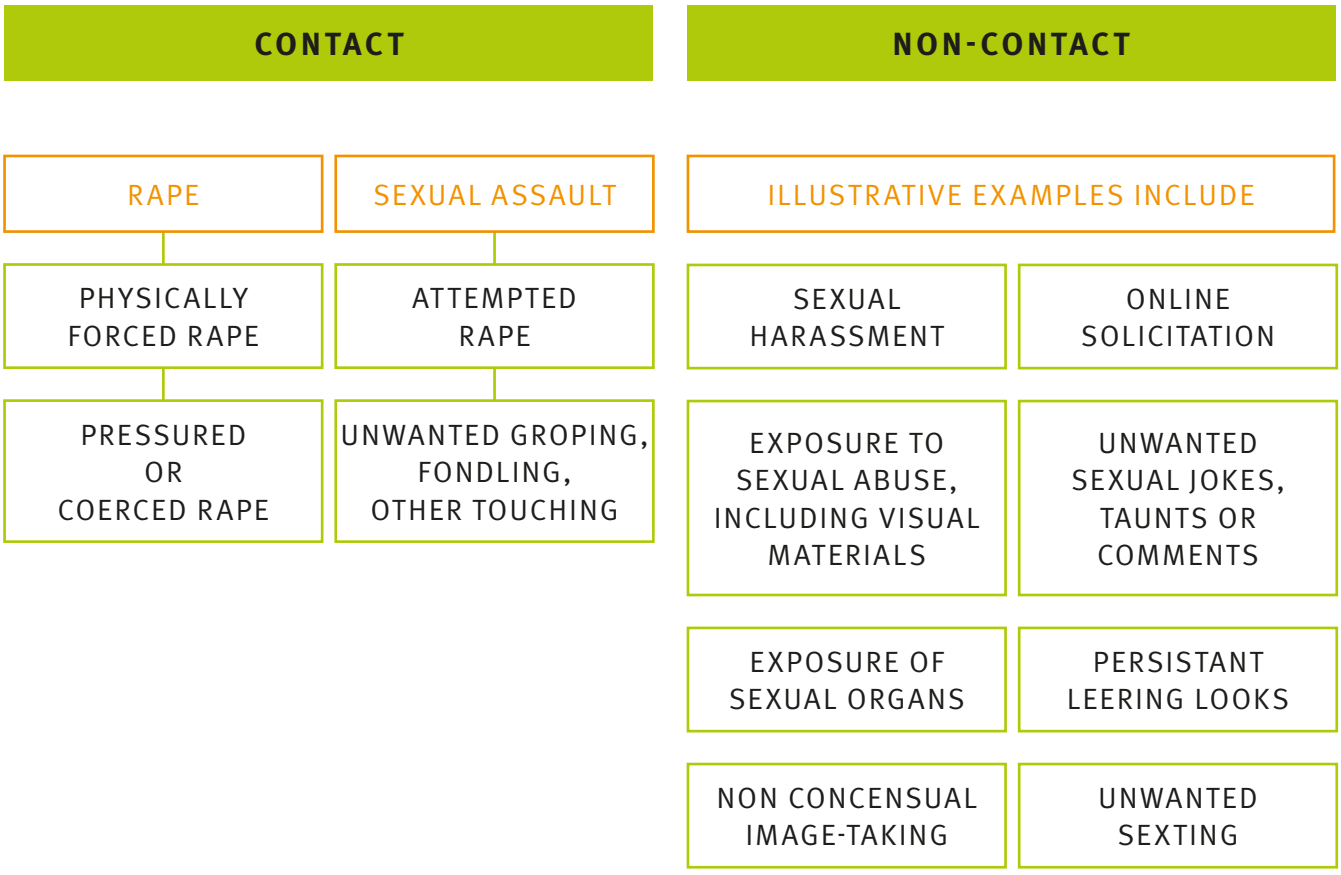
takes place when repeated verbal threats, criticism, ridicule, shouting and lack of love and affection cause a severe adverse effect on a child's emotional development. It includes conveying to children that they are worthless, unloved, inadequate or valued only as long as they meet the needs of another person. Emotional abuse may include not giving a child the opportunity to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature inappropriate expectations being imposed on a child, overprotection and limitation of exploration and learning, or preventing the child from taking part in normal social interactions. It may involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyberbullying), making children feel frightened or in danger frequently, or the exploitation and corruption of children. Certain level of emotional abuse is represented in all types of ill-treatment of children, or it may occur alone.

MENTAL ABUSE

is a form of violence that affects the mind, often leaving the abused feeling worthless and powerless. Mental abuse determines difficulties in the acquisition of basic skills, specifically deficits in reading, languages and maths, affecting intelligence, memory, recognition, perception, attention, imagination, and moral development.

SEXUAL ABUSE

involves forcing a child or young person, who is immature from the point of view of psycho-sexual development, to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact including both penetrative (i.e. rape) or non-penetrative acts (kissing, touching). They may include contactless activities, such as involving children in the production of child sexual abuse materials[21] or in watching sexual activities or sexual materials, using language with sexual connotations, or encouraging children to behave in sexually inappropriate ways. The perpetrator could be an older or more knowledgeable child or adult (a stranger, sibling or person in a position of authority, such as a parent or caretaker). Sexual abuse is integral to early marriages or engagement of children involving sexual intercourse and sexual harassment in the case of children working according to the provisions of the labour/civil code. These contacts or interactions are carried out against the child using force, trickery, bribes, threats or pressure. Sexual abuse can be physical, verbal or emotional.


CONTACT
NON-CONTACT
RAPE
SEXUAL ASSAULT
ILLUSTRATIVE EXAMPLES INCLUDE
PHYSICALLY FORCED RAPE
ATTEMPTED RAPE
SEXUAL HARASSMENT
ONLINE SOLICITATION
PRESSURED OR COERCED RAPE
UNWANTED GROPING, FONDLING, OTHER TOUCHING
EXPOSURE TO SEXUAL ABUSE, INCLUDING VISUAL MATERIALS
UNWANTED SEXUAL JOKES, TAUNTS OR COMMENTS
EXPOSURE OF SEXUAL ORGANS
PERSISTANT LEERING LOOKS
NON CONCENSUAL IMAGE-TAKING
UNWANTED SEXTING

NEGLECT

is defined as the persistent failure to meet the child's basic physical and/or psychological needs which is likely to result in the serious impairment of child's physical or cognitive development. Neglect can take different forms:

Physical Neglect or Deprivation of Needs Neglect: This type of neglect occurs when children's basic physical needs (e.g., food, shelter, and clothing) are not being met and often occurs in a persistent pattern. Examples of physical deprivation include being denied food and/or water and being left out in the elements;

Medical neglect: When medical neglect occurs, children are denied the necessary medical care, such as omission of vaccinations and control visits, failure to apply treatments prescribed by a physician, failure to attend recovery programs. Failing to secure medical attention for an injured child or withholding care with the intent to cause death are both examples of medical neglect.

Supervisory neglect: Supervisory neglect occurs when the adult responsible for a child either fails to supervise and keep the child from being harmed or fails to have someone else supervise the child and keep them from harm. This type of neglect can occur continually or only happen one time.

Environmental neglect or hygiene neglect: This type of neglect is related to both physical neglect and supervisory neglect, but it occurs when children's home environments are filthy. Rotting food may be left out, there may be infestations of rats or cockroaches, and children may regularly come to school in dirty clothing. Some professionals group environmental neglect with physical neglect.

Educational neglect: Educational neglect is when children are not given access to education. Examples of educational neglect include parents failing to register children for school or parents making children stay home from school to ensure that they don't report the abuse they experience at home.

Emotional neglect: Emotional neglect occurs when children are deprived of their emotional needs: lack of attention, physical contact, signs of affection, words of appreciation. A few examples of emotional neglect include humiliating a child, rejecting a child, or giving bizarre forms of punishment.

Leaving/abandoning the child is the most serious form of neglect[22].

BULLYING[23]

is the use of force, threat, or coercion to abuse, intimidate, or aggressively dominate others, usually repeated over a period of time. One essential prerequisite is the perception of an imbalance of social or physical power by the bully or by others. Bullying is divided into four basic types of abuse - **emotional**: isolating an individual from the activities and social acceptance of their peer group; **verbal**: racist or homophobic remarks, threats, name-calling, etc.; **physical-, and cyberbullying**. If bullying is performed by a group, it is called **mobbing**.

CYBERBULLYING[24]

is a form of bullying or harassment and is defined as intentional and repeated harm inflicted through the use of computers, phones, and other electronic devices. Cyberbullying behaviour can include posting rumours about a person, threats, sexual remarks, disclosing victims' personal information or pejorative labels (i.e., hate speech). Persons, who experience it may have lower self-esteem, increased suicidal ideation and various emotional responses such as retaliating, being scared, frustrated, angry and depressed.

CYBER GROOMING

is the process of "befriending" a young person online "to facilitate online sexual contact and/or a physical meeting with them with the goal of committing sexual abuse".[25] The main goals of cyber grooming are to gain trust of the child and to obtain their intimate and personal data (often sexual in nature, such as sexual conversations, pictures, or videos) with the aim of threatening and blackmailing for further inappropriate material.

ELECTRONIC VIOLENCE

is when someone uses data or information and communications technology (ICT) to cause mental, emotional, or psychological distress to someone. This includes recording or distributing private images or videos of a child and uploading or sharing media content of a child that has vulgar, indecent, obscene or sexual content. It also includes online harassment, cyber-stalking, hacking someone else's online accounts, using someone else's identity or tracking someone's electronic devices, as well as misrepresenting oneself to make someone else look bad or hurt their reputation.

"SEXTORTION"

is a form of extortion that involves threatening to reveal compromising or private sexual information about an individual unless certain demands are met. This often includes demanding money, more explicit images, or other favours. The perpetrator may trick victims into sharing nude images or videos, then leverage these against them by threatening to expose the materials to friends and family

ECONOMIC EXPLOITATION OF A CHILD

is the use of the child in work or other activities for the benefit of others. This includes but not limited to child labour. Economic exploitation implies the idea of a certain gain or profit through the production, distribution and consumption of goods and services. This material interest has an impact on the economy of a certain unit, be it the State, the community or the family. Examples: child domestic work, child soldiers and the recruitment and involvement of children in armed conflict, child bondage, the use of children in criminal activities including the sale and distribution of drugs, and the involvement of children in any harmful or hazardous work.

COMMERCIAL SEXUAL EXPLOITATION OF CHILDREN[26]

is sexual abuse of a child by an adult followed by remuneration in cash or kind to the child or a third person. The child is treated as a sexual and commercial object. The commercial sexual exploitation of children constitutes a form of coercion and violence against children, and represents forced labour and contemporary form of slavery.

CHILD SEXUAL ABUSE MATERIAL[27]

means representation of a child engaged in real or explicit simulated sexual activities in images or videos or any representation of the sexual parts of a child for primarily sexual purposes.

CHILD ABDUCTION[28]

is the unauthorised removal of a child from the custody of the child's natural parents or legally appointed guardians. The term "child abduction" conflates two legal and social categories which differ by their perpetrating contexts: abduction by members of the child's family (i.e. removal of the child from the custody parent in case of divorce) or kidnapping by strangers (i.e. extortion; illegal adoption of the child after they were illegally removed from custody; human trafficking - when a stranger abducts a child with the intent to exploit the child themselves or to trade them in slavery, forced labour, sexual abuse, or even illegal organ trading; murder).

RISKY MIGRATION

For children who migrate to escape difficult living situations, violence or conflict, migration can constitute an opportunity to reduce risks. Others encounter more severe risks during migration or at the place of destination. Some groups of children are vulnerable to exploitation and abuse, including trafficking, because of weak social safety nets. The risks a child is exposed to are often closely intertwined and are considered cumulative. A child who is already living in a vulnerable situation, such as poverty, abuse or school drop-out, is considered even more vulnerable when additional risks come in, such as exploitative relationships or risky migration[29]. Many children on the move are exposed to harm during the journey and at their final destination. Children face violence, exploitation and abuse at the hands of people they encounter in transit and at destination, including employers, transporters, smugglers and traffickers. They might experience significant levels of indifference or abuse by state officials, including police, border guards, immigration officials and staff in reception or detention facilities. Some of the children on the move lose their lives on the journey from dehydration, malnourishment, suffocation or transportation accidents or drown at sea. Unsafe migration conditions create risks for children. In addition to experiencing acts of violence, children risk coming into conflict with the law if they travel without the required documents, if they engage in illegal or criminal activities to make a living, or if they are persuaded or forced by others to do so. In situations of habitual mobility or circular migration, such conditions can significantly influence the well-being, safety and development of the child. As CONCORDA works daily with children, youth and families with migrant background, we have developed a CONCORDIA Child Safeguarding in Emergencies[30] to ensure their safety.

SIGNS OF POSSIBLE PHYSICAL ABUSE

- **Injuries:** Any injuries not consistent with the explanation given for them; Injuries which occur on the body in places which are not normally exposed to falls or rough games; Injuries which have not received medical attention; Bruises, bites, burns and fractures, cuts, dislocations, which do not have an accidental explanation
- **Inconsistent Stories:** Frequent changes in stories regarding injuries or how they occurred
- **Changes in Behaviour:** Sudden changes in behaviour or mood, such as becoming withdrawn, anxious, or overly compliant
- **Frozen watchfulness:** refers to a state in which a child appears overly alert, anxious, or hyper-vigilant, often as a result of trauma or fear
- **Fearfulness:** Extreme fear of certain adults or situations, or reluctance to be alone with specific individuals; Fear of returning home or of parents being contacted
- **Self-destructive tendencies:** harmful behaviours that a child may engage in, either intentionally or subconsciously, as a way to cope with emotional pain or trauma
- **Behavioural disturbances:** Being aggressive towards others or being too absent, avoiding contact with others
- **Neglect of Personal Hygiene:** A noticeable decline in personal hygiene or appearance
- **Delayed Physical Development:** Delays in physical or emotional development, which could indicate a lack of care
- **Sleep Problems:** Frequent nightmares or difficulty sleeping
- **Overreaction to Mistakes:** An exaggerated response to mistakes or a fear of being punished for minor errors

SIGNS OF POSSIBLE SEXUAL ABUSE

- The child has excessive sexualized behaviour or language, or regularly engages in sexual play inadequate for their age
- Sexual activity through words, play, or drawing
- Repeated urinary infections or unexplained stomach pains
- The child is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams, or nightmares that sometimes have overt or veiled sexual connotations
- Eating disorders such as anorexia or bulimia
- Fear of being with adults
- Unexplained changes in behaviour, such as becoming withdrawn, fearful, or unusually compliant
- Fear of certain places or people,
- Regression in developmental sills
- Avoidance of physical contact
- Sexually transmitted infections
- Excessive knowledge about sexual topics
- Changes in academic performance
- Substance abuse

SIGNS OF POSSIBLE EMOTIONAL ABUSE

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour
- Obsessions or phobias
- Sudden underachievement or lack of concentration
- Seeking adult attention and not integrating well into the community of other children
- Sleep or speech disorders
- Negative statements about oneself
- Highly aggressive or cruel behaviour towards others
- Extreme shyness or passivity
- Drug or alcohol abuse
- Running away, stealing, and lying
- Low self-esteem or feelings of worthlessness
- Difficulty forming relationships with peers or adults
- Frequent expressions of hopelessness or despair
- Overly compliant or submissive behaviour, often avoiding conflict
- Excessive fear of making mistakes or fear of criticism

SIGNS OF POSSIBLE NEGLECT[31]

- Dirty skin, body smells, unwashed, uncombed hair, and untreated lice
- Clothing that is dirty, too big or small, or inappropriate for weather conditions
- Frequently left unsupervised or alone
- Frequent diarrhoea
- Frequent tiredness
- Untreated illnesses, infected cuts, or physical complaints that the carer does not treat
- Frequently hungry, stealing food
- Frequent lateness or non-attendance at school
- Low self-esteem
- Poor social relationships
- Lack of appropriate medical or dental care
- Signs of malnutrition, such as extreme weight loss or a significant lack of physical growth
- Poor hygiene or a noticeable decline in personal care
- Unattended emotional needs, such as lack of affection or support
- Inconsistent or inappropriate responses to a child’s needs

9.3.

ANNEX 2: CODE OF CONDUCT





DO'S

- Be informed about what constitutes violence against children and the provisions of the Child Protection Policy, applying these provisions in your work or interactions with children.
- Immediately report any suspicious cases of abuse to the NFPCP.
- Treat all children equally and without discrimination.
- Maintain high standards of personal and professional conduct.
- Be aware of the higher risk of abuse in certain situations (e.g., unsupervised groups of older and younger children) and take steps to eliminate such situations.
- As a caregiver, observe and listen to the child to help them; the child's best interests and well-being should always prevail in your work.
- As a co-worker, empower children by discussing their rights, what is acceptable and unacceptable, how to avoid risky situations, and what to do if they encounter a problem.
- Respect the confidentiality of children's personal information, as well as their image and dignity.
- Be aware of CONCORDIA's media and communication guidelines and the use of information technology to protect children.
- Familiarise yourself with CONCORDIA Child Safeguarding documents.
- Be a positive role model for children, partners, and colleagues.

DON'TS

- Do not conduct investigations yourself or question the child.
- Do not inflict any kind of harm on the children.
- Never allow a CONCORDIA child to stay overnight in an adult's room or sleep in the same bed.
- Do not discriminate against, shame, or humiliate children, including using language that mentally or emotionally abuses a child.
- Do not stay alone with a child during activities that might raise questions from others.
- If you have an individual activity with a single child, do not close the door.
- Do not kiss, hug, fondle, rub, or touch a child in an inappropriate or unwanted manner.
- Do not ignore or cover up any inappropriate behaviour towards a child that you notice from any colleague, volunteer, or other collaborator within the organisation.
- Do not take pictures or record videos of a child without organisational requirements and without having the written consent of the caregiver.
- Do not do things for children that they can do themselves, such as dressing or bathing.
- Do not engage in friendships on personal social media channels (e.g., Facebook). If such connections are considered necessary, ensure that employees' social media accounts are professional accounts, with no personal information or pictures posted.
- Do not engage in one-to-one communication with children via text messages, instant messaging, or chat facilities, unless it relates specifically to your job responsibilities.

ENDNOTES

1 https://www.ohchr.org/sites/default/files/crc.pdf
2 United Nations Children's Fund, Hidden in Plain Sight: A statistical analysis of violence against children, UNICEF, New York, 2014, p. 6
3 "Any deliberate, unwanted and non-essential act of a sexual nature, either completed or attempted, that is perpetrated against a child, including for exploitative purposes, and that results in or has a high likelihood of resulting in injury, pain or psychological suffering"- UNICEF, International Classification of Violence against Children (ICVAC) https://data.unicef.org/resources/international-classification-of-violence-against-children/
4 All relevant forms and documents related to the child protection mechanism of the organisation can be found in the CONCORDIA Child Protection Operational Manual. National regulations from each country are added as annexes accordingly.
5 Keeping Children Safe Coalition 3: www.keepingchildrensafe.org.uk
6 Date of signature by Austria, Germany and Romania was 26 January 1990; Bulgaria signed it at 31 May 1990 and Republic of Moldova ratified it at 26 January 1993 and Republic of Kosovo at 27 June 2019.
7 UNICEF: https://data.unicef.org/resources/international-classification-of-violence-against-children/
8 For definition on the different types of abuse see Annex 1 of the current document.
9 For employment, the candidates will present the criminal record and the result of the occupational medical examination in accordance with the legal provisions applicable to this field of activity.
10 If this is the candidate's first employment, references may be provided by a university, internship supervisors, or similar sources. It is also possible instead of letters to establish contact via phone or e-mail and request relevant information.
11 Only when applicable in accordance with the national regulations.
12 The official template is available in the Operational Manual and must be used by all countries.
13 Role Profile of CONCORDIA International Child Protection Officer: https://www.concordia.or.at/fileadmin/user_upload/DACH/Files/CONCORDIA-RoleProfile-InternationalChildProtectionOfficer.pdf
14 CONCORDIA Child Protection Policy – Child Friendly Version: https://www.concordia.or.at/fileadmin/user_upload/DACH/Files/Kinderschutzrichtlinie/CPP-childfriendly.pdf
15 CONCORDIA Video on Children's Rights: https://youtu.be/6mS2E2waXyk
16 More on child-friendly spaces: https://childfriendlyspaces.warnathgroup.com/
17 CONCORDIA Visual Storytelling Guidelines: https://www.concordia.or.at/fileadmin/user_upload/DACH/Files/Visual_Storytelling_Guideline_ex2023.pdf
18 Fulfilment of quality standards for social services provided to children; Professional ethical codes for psychologists and social workers; Provisions of legislation regarding preventing and combating domestic violence (or any other types of violence against children).
19 For more information, please refer to CONCORDIA Child-friendly safeguarding guidelines.
20 The most important expected or undesirable behaviours in regard to child protection aspects that is included in the Code of Conduct are listed in the Annex 2.
21 CONCORDIA does not use the term "Child Pornography" as the term cab lead to confusion, misunderstanding, or even harm. Child sexual abuse material is a result of children being groomed, coerced, and exploited by their abusers, and is a form of child sexual abuse. But using the term "child pornography" implies it is a sub-category of legally acceptable pornography, rather than a form of child abuse and a crime.
22 "Child abuse and neglect" – Sociological study at national level; Save the Children Romania and the Ministry of Labor, Family, Social Protection and Elderly Romania, 2013
23 Wikipedia: https://en.wikipedia.org/wiki/Bullying
24 Wikipedia: https://en.wikipedia.org/wiki/Cyberbullying
25 Child Safe Net: https://www.childsafenet.org/new-page-15
26 Questions and Answers about the Commercial Sexual Exploitation of Children, ECPAT International, 2001
27 Optional protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child sexual abuse materials, United Nations, 2000
28 According to National Centre for Missing & Exploited Children
29 United Nations High Commissioner for Refugees, Conclusions on Children at Risk, Executive Committer Conclusions, no. 107 (LVIII), 2007
30 CONCORDIA Child Safeguarding in Emergencies: https://www.concordia.or.at/fileadmin/user_upload/DACH/Files/CONCORDIA-ChildProtectioninEmergencies.pdf
31 Please note that some of these signs may also be indicative of poverty or socioeconomic factors, rather than abuse or neglect. It is essential to consider the broader context when evaluating these behaviours.

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