



WWP || EUROPEAN NETWORK

# WWP EN

## Child Protection Policy



## Key Contact Information

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# WWP EN Child Protection Policy and Procedures

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## Policy Statement

WWP EN's mission is to prevent violence in close relationships as a gender-based phenomenon and to foster gender equality. The network's main objective is to improve the safety of women, their children, and others at risk from violence in close relationships by promoting effective work with those who perpetrate this violence, mainly men.

WWP EN is therefore committed to safeguarding the well-being of all the children and young people that may in any way be affected by the organisation's interventions. Although WWP EN does not work in direct contact with survivors<sup>1</sup> and/or perpetrators of violence, its actions can have an impact on perpetrators and survivors, including children. Likewise, through its member organisations, it has an indirect ethical responsibility to ensure that all measures are in place to protect all survivors, namely women and children.

The following policy is in accordance with the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention) and the United Nations Convention on the Rights of the Child (UNCRC).

## Scope of the Policy

The WWP EN Child Protection Policy applies to:

- all staff, management and board members, interns, and volunteers.
- all those acting on behalf of WWP EN, such as members (e.g., members hosting a study visit), consultants, or trainers.
- all those participating in WWP EN events and meetings (e.g., Study Visit, Annual Conference) involving children, including journalists, sponsors, donors, policy makers, etc.

All the individuals cited above will be expected to read WWP EN's Child Protection Policy and to sign a statement of commitment declaring that they will adhere to its principles and procedures.

## Spreading Awareness

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For the effective implementation of the child protection policy, it needs to be understood accurately by all those to whom it applies. WWP EN will ensure that all its staff, interns, volunteers, consultants, etc., are informed about this policy, act following all its provisions, and do not harm children they may encounter during or outside their work.

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<sup>1</sup> Survivor refers to any person who has experienced domestic violence or gender-based violence. It is similar in meaning to "victim", but is generally preferred because it implies resilience. Within this document, "survivor" refers to women, unless indicated differently.

The Membership Officer will send the WWP EN Child Protection Policy to all organisations and individuals upon their joining the network. Relevant staff members will ensure that a copy of the policy is sent to all organisations or professionals that provide services on behalf of WWP EN.

## Child Protection Principles and Values

This child protection policy deals with the protection of children and adolescents as defined by the UN Convention on the Rights of the Child (UNCRC). The UNCRC should be implemented holistically, providing a comprehensive framework for the protection, provision, and participation of all children. Fundamental principles that WWP EN applies in its work are:

- Do no harm
- All children have equal rights to protection from harm.
- Everybody has a responsibility to support the protection of children.
- Organisations have a duty of care to children with whom they work, are in contact with, or who are affected by their work and operations.
- If organisations work with partners, they have a responsibility to help them meet the minimum requirements for protection.
- All actions on child safeguarding are taken in the best interests of the child, which are paramount.

All children and adolescents involved or affected by WWP EN related activities, projects and programmes have a right to their health, safety and well-being and to have their best interests considered a top priority; to have their development promoted and safeguarded so that they can achieve their full potential; to be valued, respected and understood within the context of their own culture, religion and ethnicity; to be listened to and to have their views given careful consideration, and to be encouraged and helped to participate in decisions which affect them, including in child protection decisions. In specific relation to WWP EN's work with perpetrators, the Istanbul Convention is also a basic reference. In particular, there are specific forms of less recognised violence against children pertaining to the "protection and support for child witnesses" (Article 26) and assuring that children's rights are respected, and their voices heard in issues linked to "Custody, visitation rights and safety" (Article 31). Therefore, it is central to WWP EN to support all countries in promoting and lobbying to ensure the protection and support of the needs of children witnessing all forms of violence, including age-appropriate psychosocial counselling. Concerning violence of a father against a mother and/or a child, in determining custody and visitation rights, protection from violent fathers and all incidents of violence, including having witnessed violence, should be central in the court's evaluations. It is necessary to ensure that any visitation or custody rights exercised do not jeopardise the rights and safety of the mother and the children.

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### Non-Negotiable Duty

WWP EN believes that NGOs working with perpetrators must also prioritise the safety of those affected by the violence, mostly women and children. Therefore, it is relevant for the protection of children's rights that perpetrator programmes understand their absolute duty to do no harm and protect children from abuse, mistreatment, and exploitation from within and outside of the

organisation. This duty is imperative and non-negotiable and concerns everybody and all activities and operations within WWP EN, including project partners. Without adequate standards and mechanisms for protection, an organisation is not only failing in its primary duty of care but may also be negligently or recklessly fostering an environment of abuse.

## Open Environment

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WWP EN believes in:

- Creating an environment where issues of child protection are discussed openly and are understood
- Creating specific attention and awareness for issues faced by children living in situations of domestic violence, such as:
  - children witnessing violence
  - imbalances of power in the judicial system penalising the relationship between victimised mothers and their children through a manipulative use of the system by the perpetrators
  - the importance for children's well-being that their mother is supported and helped to overcome possible trauma-related effects
- Promoting open lines of communication both internally and externally within and between member organisations to improve awareness and implementation of child protection policies and practices
- Creating a framework to deal openly, consistently, and fairly with allegations concerning both direct and indirect abuse

## Children's participation

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WWP EN recognises the need to include children's participation in all proceedings that concern them and promotes children's participation. WWP EN believes that effective and sustainable protection of children can only be achieved through their involvement. WWP EN supports the implementation of strategies that include children's participation based on the nine requirements for meaningful, safe, and inclusive children's participation (United Nations Convention on the Rights of the Child, General Comment no.12, 2019):

- 1) Participation is transparent and informative
- 2) Participation is voluntary
- 3) Participation is respectful
- 4) Participation is relevant
- 5) Participation is child-friendly
- 6) Participation is inclusive
- 7) Participation is supported by training
- 8) Participation is safe and sensitive to risk
- 9) Participation is accountable

## Implementation and Accountability

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This child protection policy is developed to the highest standards of professional behaviour and personal practice to ensure no harm occurs to children and adolescents in any situation during their involvement in activities, projects and programmes in any way linked to WWP EN. It therefore includes measures regarding recruitment procedures, review of management structures, staff training, and development of transparent protocols. The included standards are a tool for the promotion of the welfare of children in activities, projects and programmes related to WWP EN.

The policy is supported by clear guidelines on how it needs to be implemented by organisations participating and supporting children in activities, projects and programmes related to WWP EN.

Special procedures and checklists are part of the policy, including reporting procedures and actions following behaviour, which is not in compliance with the child protection standards. Any concerns related to the behaviour of staff, volunteers, interns, a board member, or members will be considered and investigated, and the consequences if/of breaking the code of conduct range depending on the level of harm from an internal admonition to a report to the appropriate authorities.

The principles outlined above underpin all the standards set out in this document.

## Definitions<sup>2</sup>

### Child

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A child is defined as anyone under the age of 18, in line with the UN Convention on the Rights of the Child (1989).

### Child Protection

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Child protection is a broad term to describe philosophies, standards, guidelines, and procedures to protect children from both intentional and unintentional harm. In the current context, it applies to WWP EN's duty to make sure that its staff, operations, and programmes do no harm to children, namely that they do not expose children to the risk of harm and abuse, and that the organization takes action in case of any concern about children's safety.

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<sup>2</sup> Definitions are taken from: Eurochild Child protection policy, Setting the Standard: A common approach to Child Protection for international NGOs, Standard 1 (Policy); The WHO definition of Child Abuse as defined by the Report of the Consultation on Child Abuse Prevention WHO 1999; Child protection fact sheet: The definitions and signs of child abuse. NSPCC, 2009; Definitions of Child Sexual Exploitation and Related Terms. NGO Group for the Convention on the Rights of the Child, 2000; Questions and Answers about the Commercial Sexual Exploitation of Children. ECPAT International, 2001; Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography. United Nations, 2000; Child Protection Policies and Procedures. ECPAT International Secretariat, 2006; The UN Secretary General's Study on Violence, 2005, Istanbul Convention (Art. 26 and Art. 31)

## Direct Contact with Children

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Being in the physical presence of a child/children, or online contact in the context of WWP EN's work, whether contact is occasional or regular, short, or long-term. This could include, for example, attending meetings and conferences at which children are present, working with child volunteers in the WWP EN member organisation's offices, or providing an online service for children affected by cyber-violence.

## Indirect Contact with Children

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Having access to information on children in the context of WWP EN's work, such as children's names, locations (addresses of individuals or projects), photographs and case studies.

Development of training programmes for working with fathers that use violence or providing funding for organisations that work directly with children. These activities have an impact on children, and therefore confer upon the donor organisation's responsibility for child protection issues.<sup>3</sup>

## Child Abuse and Exploitation

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According to the World Health Organisation, child abuse or maltreatment constitutes "all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power".<sup>4</sup>

WWP EN's understanding of child abuse and exploitation includes, but is not limited to:

- **Physical abuse:** This type of abuse may involve hitting, shaking, throwing, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child they are looking after. This is commonly described using terms such as 'fictitious illness by proxy' or 'Munchausen's syndrome by proxy'.
- **Emotional abuse:** This type of abuse is defined as the persistent emotional ill-treatment of a child such as to cause severe and persistent effects on the child's emotional development. It may involve conveying to children that they are worthless and unloved, inadequate, or valued only so far as they meet the needs of another person. It may involve age or developmentally inappropriate expectations being imposed on children. It may involve causing children to feel frightened or in danger frequently or the exploitation or corruption of children.  
Some emotional abuse is involved in all types of ill-treatment of a child, though it may occur alone.
- **Domestic violence-related forms of child abuse:** In the context of domestic violence, children can be exposed to multiple form of abuse.

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<sup>3</sup> This is a non-exhaustive list of possible scenarios.

<sup>4</sup> See footnote 1



It is important to recognise the gendered nature of domestic violence and how this can affect children in many ways. It must always be clear how forms of violence against the mother also represent direct forms of violence against the children.

It is also central to support the efforts of the parent (usually the mother) that is trying to protect the children, who are often penalised by the court/social system. Within this framework, specific attention must be posed to forms of post-separation violence against the mother, which may take the form of, among others, physical, emotional, sexual, and economic violence. In all these cases, the imbalance of power may damage both the mother and the children and compromise the protection of the child's right to a safe and stable childhood.

- **Sexual abuse:** This type of abuse involves forcing or enticing a child to take part in sexual activities, whether the child is aware of what is happening or not.
- The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.
- **Child pornography** means any representation, by whatever means, of a child engaged in real or simulated explicit sexual activities or any representation of the sexual parts of a child for primarily sexual purposes. This can include photographs, negatives, slides, magazines, books, drawings, movies, videotapes and computer disks or files.
- Sexual abuse of children **also includes** any contact or interaction between a child and an older or more knowledgeable child or adult (a stranger, sibling or person in a position of authority, such as a parent or caretaker) when the child is being used as an object of gratification for an older child's or adult's sexual needs. These contacts or interactions may be carried out by using force, trickery, bribes, threats or pressure. Even if there are no evident signs of force, cases of sexual interaction between a child and an adult can never be considered consensual.
- Sexual abuse can be **physical, verbal or emotional**. Sexual abuse also extends to any form of **commercial sexual exploitation of children** comprised of sexual abuse by the adult and remuneration in cash or kind to the child or a third person or persons. The child is treated as a sexual object and as a commercial object. The commercial sexual exploitation of children constitutes a form of coercion and violence against children and can also amount to forced labour and a contemporary form of slavery.
- **Other non-sexual forms of commercial exploitation** can be the exploitation of a child for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. This includes, but is not limited to, child labour.
- **Neglect:** This type of abuse is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the severe impairment of the child's physical or cognitive development.
- **Peer abuse and Bullying:** This type of abuse is defined as deliberately hurtful behaviour, usually repeated over some time, during which it may be difficult for those bullied to defend themselves.

- It can take many forms, but the four main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name-calling), emotional (e.g. isolating an individual from the activities and social acceptance of their peer group) and sexual (pressuring peers to engage in sexual activities, sexting and any other sexual activity that could be the object of blackmailing).

A child being abused may experience more than one type of cruelty. Discrimination and harassment are also abusive and can harm a child physically and emotionally.

## Member

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For the purpose of this policy, a member is a full or affiliate member of WWP EN.

## Policy

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A statement of intent that demonstrates a commitment to safeguarding children from harm and clarifies what is required in relation to the protection of children. It helps to create a safe and positive environment for children and shows that the organisation is taking its duty and responsibility of care seriously.

## Purpose of the Policy

WWP EN needs a child protection policy to ensure that

- Children are protected. Some children are particularly vulnerable to abuse, exploitation, and ill-treatment at the hands of carers, project workers, and those with access to their personal information. Many children growing up in vulnerable circumstances have already experienced ruptured relationships of trust or abuse of an adult-child relationship in the form of physical, psychological, or sexual abuse. It is also important to recognise that in situations of domestic violence, the safety of the mother is central to child protection.
- The organisation's staff is confident in protecting children; Staff can recognise potential abuse and feel confident to react to it, following clear procedures. Staff is also supported to think about children's needs and their activities' impact on children. This brings the feeling of safety to the staff, as they know that they are doing everything possible to ensure the safety and well-being of children.
- The organisation and its reputation are protected. Organisations working with violence may have contact with vulnerable children that have been, are and will continue to be vulnerable to abuse until the issues are brought into the open. Without a proper child protection policy and child protection standards in place, allegations of abuse, whether founded or unfounded, can destroy an organisation's reputation. This has serious implications for fundraising as well as the reputation of the children's rights NGO sector.

## Staff, Members and External Partners

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The WWP EN Child Protection Policy applies to all WWP EN staff and external partners who act on behalf of WWP EN.

As of the 2018 General Assembly, new membership applicants are asked to demonstrate the existence of their own child protection policy that meets or goes beyond WWP EN standards. If no child protection policy is in place, applicants will be encouraged to develop and adopt such a policy. WWP EN will provide guidance and support in this aspect through training and individual consultations.

In 2025, WWP EN will develop a European Accreditation System for Perpetrator Programmes. This system will have child safety and a comprehensive child-protection policy as one of its key elements.

In the event of grave misconduct in relation to child protection or in child abuse cases by a WWP EN member organisation, WWP EN may decide to terminate the membership. However, we will always aim to work alongside members to improve practices and address concerns openly and constructively before considering a membership termination.

Any external partners cooperating with WWP EN in organising events involving children will be asked to provide evidence of their child protection policy.

### Staff and Personnel

As a condition for working with WWP EN, all staff, management and board members, interns, and volunteers, and all those acting on behalf of WWP EN, such as members, consultants or trainers, are required to both accept and commit to WWP EN's Child Protection Policy by signing a statement of commitment declaring that they will adhere to its principles and procedures. This statement will be included in their service contracts.

This includes the recruitment and appointment process:

- Staff, volunteers, interns, and consultants are recruited to clear job or role descriptions that include, if applicable, a statement on the position or role's responsibilities to meet the requirements of WWP EN's Child Protection Policy.
- All job interviews should include a discussion on child safeguarding and protection, the candidate's understanding of this and WWP EN's commitment to child safety.
- Adherence to WWP EN's Child Protection Policy is part of WWP EN employment contracts and service agreements.

## Training and Education

Education and training are essential to implementing the child protection policy. This includes:

- An induction period (within three weeks of taking up the position) of staff/ volunteers/ interns/ Members/ Board members by the Training and Capacity Building Manager. This will include training on behaviour guidelines for those in direct contact with children and guidance on the acceptable and unacceptable sharing of information about children. This training will also allow staff to learn to identify sources of support for children and their families.
- Child safeguarding training for all staff, volunteers, and interns, appropriate to their roles and responsibilities.
- WWP EN will provide training and workshops for its members on child protection within perpetrator work.

## Behaviour Protocols

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All staff, volunteers, interns, management and board members, consultants or advisers will be fully informed of WWP EN's Code of Conduct. The Code of Conduct needs to be applied for in-person and online activities. Relevant parts are copied below for easier reference, with the addition of guidance for staff for using social media.

WWP EN is committed to protecting children from abuse and exploitation. The network will take all necessary actions to prevent child abuse and/or respond to children in such situations by diligently investigating all reports of alleged abuse based on its child protection policy, irrespective of the nature of the referral, who the allegations are about, who the referrer is or where they are from.

This code of conduct includes guidance on ethical and proper standards of adult behaviour towards children and of behaviour between children. It has been developed with the best interests of the child as the primary consideration and should be interpreted in a spirit of transparency and common sense.

### Do

- Be aware of what constitutes child abuse and exploitation (included in the child protection policy) and understand the provisions determined in the child protection policy.
- Recognize signs of abuse and report any suspicious observations immediately to the Child Protection Focal Point.
- Ensure that you know who the Child Protection Focal Point at WWP EN is.
- Respect lines of authority and reporting procedures.
- Respect others' basic rights by treating them fairly, honestly, and tactfully, and by treating people with dignity and respect.
- Treat all children equally: be inclusive and involve all children without discrimination.
- Work actively to ensure the highest levels of respect towards each other.
- Maintain high standards of personal and professional conduct.
- Protect the health, safety and well-being of yourself and others.

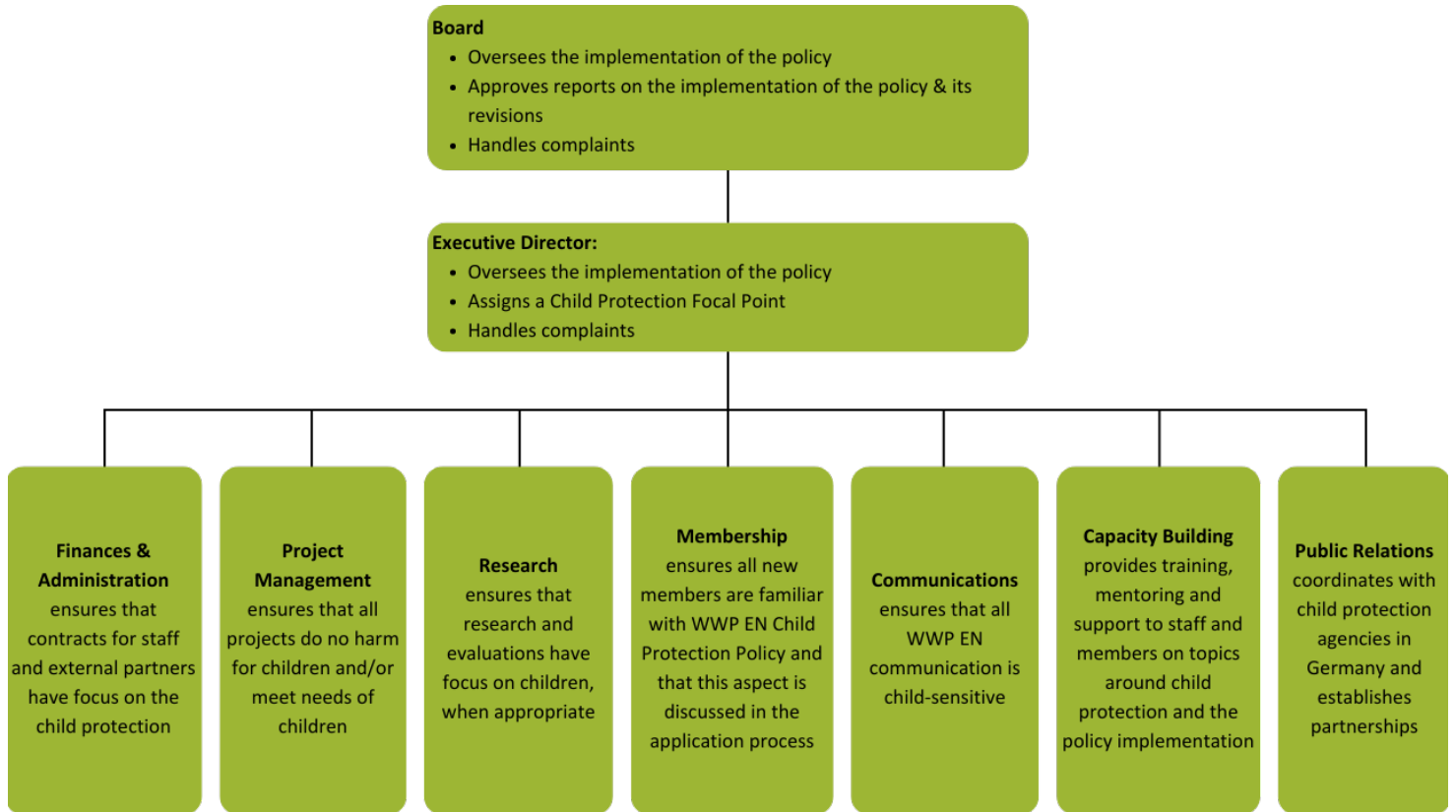
- Be aware of high-risk peer situations (e.g. unsupervised mixing of older and younger children and possibilities of discrimination against minors).
- Be aware of the potential for peer abuse (e.g. bullying).
- Be concerned about how your language, actions, and relationships with children could be perceived.
- Develop special measures/supervision to protect younger and especially vulnerable children from peer and adult abuse.
- Provide an environment encouraging children's personal, physical, social, emotional, moral and intellectual development.
- Encourage and respect children's voices and views.
- Limit access to and/or do not expose children to inappropriate electronic material.
- Always respect the confidentiality of children's personal information.
- Obtain (written) consent from the child and/or parent/carer when photographing, filming or requesting personal information for activities.
- When using social media, be aware of how the content you share can affect children.
- When using social media, use an appropriate tone and style of expressing yourself.

### Don't

- Engage in any form of sexual activity with children.
- Commit any acts or behave in any way that could be construed as poor practice or potentially abusive. For example, never behave in an inappropriate or sexually provocative manner.
- Have a child stay overnight in the adult's room or sleep in the same bed (unless prior consent is provided by both the child and their parent/guardian).
- Perform activities for children that they can do themselves, including dressing, bathing and grooming.
- Discriminate, shame, humiliate, belittle, or degrade children. This includes anything that may be considered emotional abuse (e.g. using language that will psychologically or emotionally abuse a child or telling a story/show pictures that will mentally or emotionally abuse a child).
- Hit or otherwise physically assault anybody.
- Act in any way that may be abusive or place others at risk of abuse.
- Condone violations of this code by others (staff, interns, consultants, etc.).
- Be alone with a child in any circumstances that others might reasonably question.
- Allow children to engage in sexually provocative games with each other.
- Kiss, hug, fondle, rub, or touch a child in an inappropriate or culturally insensitive way (e.g. do not initiate physical contact, such as holding hands, unless initiated by the child).
- Suggest inappropriate behaviour or relations of any kind or encourage any infatuation by a child.
- Take photos, film or request personal information if not required for WWP EN activities.

## Implementation and Management

All WWP EN staff are responsible for ensuring the implementation of the child protection policy in the organisation's work. However, each staff member has specific duties that are related to their positions and the scope of the work.



## Child Protection Focal Point (CPF)

Child Protection Focal Point is a staff member that has a role to:

- Inform new staff members about the WWP EN Child Protection Policy
- Act as a contact point for any concerns regarding child safety and well-being, as well as reporting inappropriate behaviour of WWP EN staff
- Lead OCRI process during the annual planning of activities (see next section)
- Monitor implementation in the organisation
- Draft annual reports that are presented to the Executive director and the Board

The name and contact details of the CPF will be clearly displayed in the WWP EN office, and new staff will be made aware of the role. Information will also be published on the website.

## Organisational Child Risk Identification (OCRI) and Safe Programme Design

WWP EN will identify, prevent, monitor, and mitigate any risks that might be imposed on children as a result of its staff, operations and activities.

**Note:** In the context of child safeguarding, the term “risk assessment” is used to describe risks posed to children through the organisation’s staff, operations and programmes. Risk assessment in the domestic violence field is usually used for identifying risks of violence in the context of violence within the family. To avoid terminological overlapping, WWP EN will use the term Organisational Child Risk Identification (OCRI) for the process of identifying and mitigating service-generated risks to children.

WWP EN will conduct Organisational Child Risk Identification in the following cases:

	Activity	When	Lead	Participants
1.	Annual planning of activities	January every year	Child Focal Point	Whole team
2.	Project preparation and submission of all projects/bids	Once during the project preparation	Project Manager	Team members appointed by the Project manager
3.	Projects/bids/activities that have children as a direct target group	Once a year, for each project/bid/activity	Project Manager/Staff responsible for the activity	Team members appointed by the Project manager/responsible staff

This presents a minimum of activities for which OCRI will be conducted. However, if there is a need, this process can be initiated more often by any of the team members.

OCRI takes place in a joint meeting. This is a structured meeting in which a set of questions is addressed, following the form in Annex 1. Each meeting is minuted, and documentation is saved in the appropriate joint team folder.

## Reporting Procedures

Child Protection Focal Point

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All staff, volunteers, interns, members, and service providers should be alert to signs that may suggest a child needs help<sup>5</sup>. Likewise, all should be alert to signs that indicate that activities and operations of WWP EN are potentially harming children. **There is an obligation to report any witnessed, suspected, or alleged violations of WWP EN Child Protection Policy.**

However, reporting an incident can be a complicated process. This reporting procedure is made widely available to ensure that everyone is clear on what steps to take regarding the safety of children and other witnesses.

WWP EN acknowledges that children can be harmed by WWP EN staff, members, associates, or as a result of WWP EN activities and operations.

When a child protection/safeguarding concern is brought to your attention, apply ACT:

**A**ct on your concerns: if in doubt, speak out.

**C**hild-centred: the protection of children is the most important consideration.

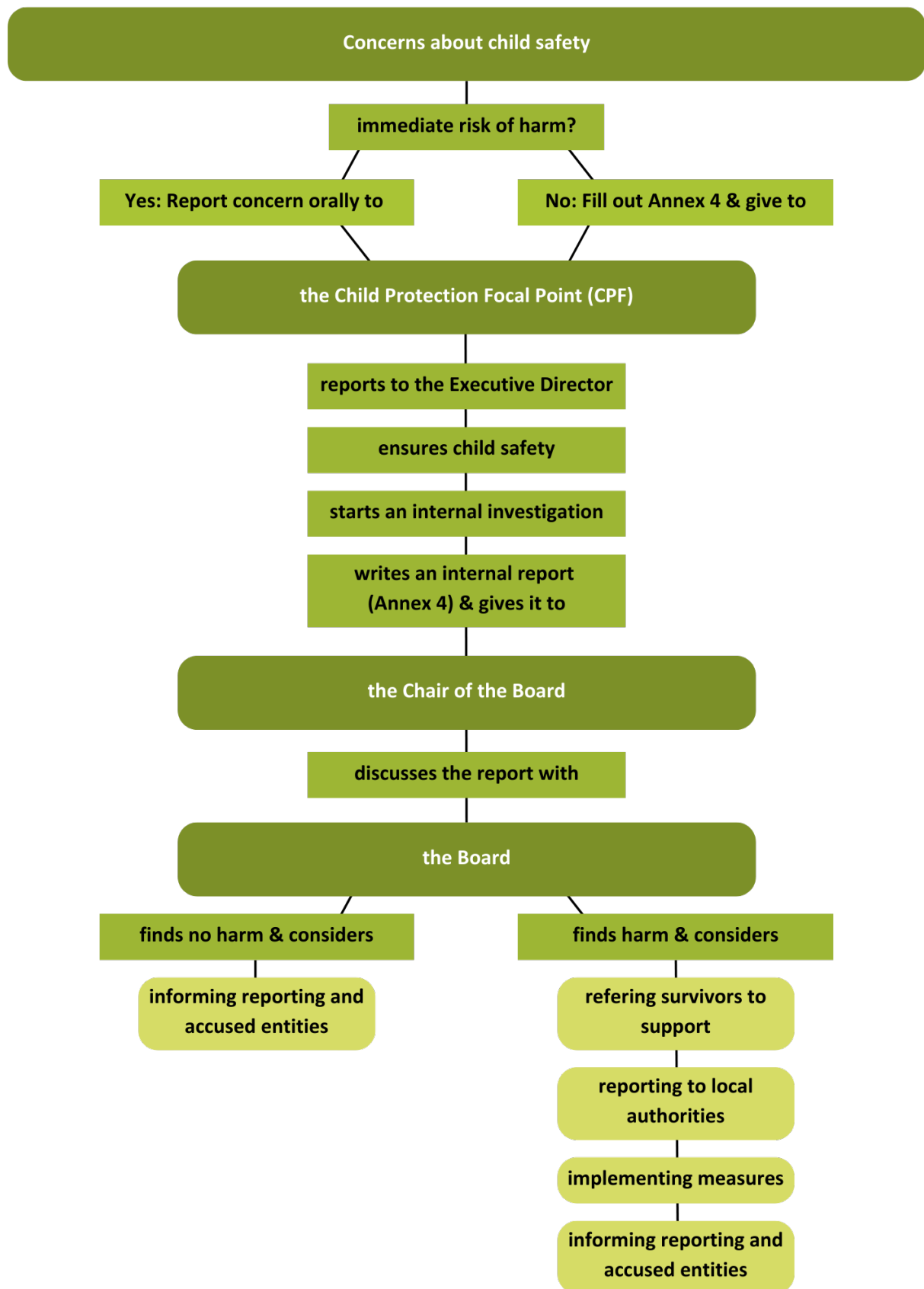
**T**ime counts: ensure timely, effective, confidential and appropriate responses to child safeguarding issues.

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<sup>5</sup> For an overview of signs of abuse see [Annex 3](#)



Steps of the reporting and reporting management process are presented in this flowchart:



All witnessed, suspected, or alleged violations of the WWP EN Child Protection Policy **will be immediately reported** to the Child Protection Focal Point (CPF). This can be done orally if the child is at immediate risk of harm or using the safeguarding reporting form in other cases (see [Annex 4](#)). The safety of the child is always the most crucial consideration.

The CPF will inform the Executive Director. In case one of the WWP EN staff or associates is accused of harming children, temporary suspension of that professional will be considered.

The CPF prioritises assessing the needs of the child/children and the risk of harm to which they might be exposed. If there is a high risk of an immediate harm, CPF takes measures to ensure child's safety (such as informing relevant local authorities, informing local child protection agencies). When a violation of the Child Protection Policy is reported, CPF needs to:

- inform the reporting entity that the request is received and inform them about WWP EN procedures (sending a copy of CPP).
- in case WWP EN's staff or associate is accused, discuss whether that professional should be informed about the process (depending on the estimation that disclosing may put children or the process at additional risk).
- conduct an internal investigation to understand the case in the best way. This may include interviews, gathering documentation, consulting relevant experts and similar. The investigation is conducted confidentially, specifically ensuring the data protection of potential survivors.
- drafts detailed report describing all relevant information about the case.

These records will be stored securely, with access limited to the CPF or the Executive Director.

When the internal investigation is finalised, CPF sends a report to the Chair of the Board. The Board discusses the case and decides whether there is harm to the child/children or a lapse in the activities and operations of WWP EN. The decision is explained in the report. The reporting entity, as well as the accused entity (if any), are informed.

If there is harm to the child/children, or there were activities of WWP EN operations and staff that could harm children, the board decides on the following aspects:

- **Reporting the case to relevant authorities in the relevant country** - If there is a suspicion of violation of the law, reporting to the relevant local authorities needs to be considered. In the case of reporting, WWP EN needs to translate its report into the appropriate language and send the report with accompanying documentation to the authorities. WWP EN needs to cooperate with the authorities in the process of investigation. As an alternative, WWP EN can consider informing and cooperating with local child protection NGOs, as these organizations have better understanding of the country's legal framework and possibilities for protection and support.
- **Measures toward WWP EN staff or associates** - If the CPP was violated by WWP EN's staff or associates (members, consultants...), they must be held accountable for their actions. WWP EN can apply warning measures with associated capacity building or termination of the contract/membership.

- **Referral of survivors to support** - WWP EN will focus on supporting survivors or reduction of the harm caused by its staff, actions or operations. This may include connecting survivors with relevant organisations in the respective country, changing documents/activities that caused harm, or similar.

Individuals or organisations have the right to appeal the decision made by the board. In such instances, the individual/organisation must write to the Board Chair within one week of receiving written confirmation of the complaint outcome, explaining the grounds for appeal. The Chair will consider the request, including re-examining the evidence and reports and talking directly to staff and others involved. The Chair will take their finding to the board for the final decision, which will be confirmed in writing. The decision from the appeal process is final.

If individuals and organisations have concerns about the decision made on the appeal, they can refer their concerns to the relevant court in Germany.

Throughout the process, measures will be taken to ensure no conflict of interest. WWP EN acknowledges that professionals who have appointed roles in child safeguarding and reporting management can also break the CPP and that this can interfere with their ability to conduct the reporting management process fairly. Likewise, as a membership organisation, WWP EN has strong and sometimes personal ties to professionals or organisations that might break the policy.

If a professional appointed in the WWP EN child safeguarding process is accused of breaking the policy, another professional will take on their role to ensure a fair process.

Child Focal Point	➡	Executive Director
Executive Director	➡	Chair of the Board
Chair of the Board	➡	Secretary of the Board

All professionals involved in the reporting process will need to reflect on the issue of conflict of interest and if there are any personal and professional ties with the accused professional/organisation that might prevent them from being objective (Annex 5). If there is a conflict of interest, that professional will be replaced. WWP EN will consider involving external experts in the process to ensure no conflict of interest.

All staff and board members need to raise any concerns about the potential conflict of interest they see, and discuss this with the CFP, Executive Director, or the Chair of the Board.

## Communications and Media Guidelines

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The rights and dignity of the child must be respected at all times, and the child's best interests must be maintained as the paramount concern of all WWP EN communications, especially regarding children. Additionally, WWP EN will never use discriminatory or degrading language.

According to the General Data Protection Regulation (GDPR), which came into force on 25 May 2018, pictures and videos of a person are considered personal data and are to be treated as such, which includes obtaining informed consent for all ways and platforms on which a picture or video will be used and ensuring a person can exercise their right to be forgotten.

This section provides guidelines on using children's images, films and stories for media and communication purposes to ensure data protection. It also serves to protect children, as abusers sometimes target children whose pictures they see in media and communication materials.

### Principles

WWP EN communications follow these principles:

- **Dignity:** The child's dignity must be preserved at all times. Language used must not degrade, victimise, or shame the child. Children's images shall generally be avoided, and if they are used, children should always be dressed appropriately. They should never be depicted in any poses that could be interpreted as sexually provocative.
- **Accuracy:** The portrayal of children must not be manipulated or sensationalised in any way. Images and stories should provide a balanced depiction of the child's life and circumstances, balancing negatives with empowering images or showing children's progress. Communications should avoid making generalisations, which do not accurately reflect the nature of the situation and pictures should not be taken and used out of context.
- **Privacy:** Any information that could be used to identify a child or put them at risk will not be used. WWP EN will ensure that:
  - Only the first names of children are used. One must be careful not to reveal details about the residence, school and other information that could lead to them. If needed for child safeguarding, the names of children will be changed.
  - Information about a child/children's life and photographs of children (including information stored on the computer) will be kept in secure files. Access to these should be limited to those needing to use them during work.
  - The recorded images should focus on an activity and, where possible, feature groups of children rather than individuals.
- **Prevention of children's exposure to potentially disturbing content, such as graphic descriptions or depictions of violence:** WWP EN is aware that children can come across content that can be potentially disturbing on our social media channels. When posting this kind of content, it will be marked with an appropriate content warning to prevent possible harm.

Any complaints or concerns about inappropriate or intrusive images should be reported and recorded like any other child protection concern.<sup>6</sup>

## Informed Consent

Informed consent must always be sought before taking any photos, videos or requesting personal information about children's lives that may then be used in WWP EN's materials. Informed consent means that children are told how WWP EN may use the information or images/film and that they are under no obligation to agree to its use. They should also be reassured that locations and other identifying information that might lead to their location of residence will be changed. They will need to be asked whether they consent that their first name is shared with the information or images/film.

Consent must be obtained by completing and signing the media consent form. Consent is also required from the child's parent/carer or guardian, who must countersign the form or, where this is not possible, from the organisation working with them. The organisations working with the children should lead on asking for the consent of children and families, as they may feel more comfortable refusing consent when asked by someone they already know and trust.

The media consent forms and other consent forms will be kept in the child's file by WWP EN.

Obtaining prior written consent does not mean there is no requirement to obtain verbal consent when taking photographs/video/interviews.

## Interviewing Children

Interviewing children requires skills and should follow certain basic principles to ensure their dignity and rights are respected.

- **Informed Consent:** In relation to interviews, informed consent includes explaining what subjects are likely to be covered in the interview and clarifying the child's right to withdraw their consent at any point. The interviewer should review the child's understanding of consent at the start of the interview.
- **Provision of support:** There should be someone else present during the interview with whom the child is familiar. Wherever possible, the child should be given a choice regarding who supports them during the interview, including the right to choose to be alone if the child is over 14.
- **Respecting the right to say No:** It must be clear before the interview that the child talks if they are comfortable doing so and that they can stop the interview and withdraw their consent at any point.
- **Gender:** Consider the different needs of different genders and which gender they would be more comfortable talking to. Gender must be considered when deciding what topics may be discussed.

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<sup>6</sup> See section on Reporting Procedure

- **Respecting the right to information:** If you are going to take notes or record the interview in another way, you must explain this to the child and verbally ask their permission.

### Visits by Photographers, Film Crews, Journalists and Others

Special care must be taken when organising visits for external photographers, filming crews, journalists, or visitors within the scope of WWP EN projects, activities, and publications:

- Journalists, photographers, film crews, etc., must be fully briefed about the WWP EN Child Protection Policy before they meet the children, who will be interviewed, photographed or filmed. They sign their commitment statements to adhere to this policy.
- The organisation(s) involved ensures that photographers and filmmakers are not allowed to spend time with or have access to children without supervision. They must be accompanied by staff at all times.
- Children, parents, and guardians must be informed about how the film, photograph or story will be used, and consent must be obtained. This is distinct from the consent they have given for the use of materials by WWP EN or the national/local organisation they are involved in.
- Copies of images, film and story should be sent to the (member) organisation to be passed on to the children.
- To protect the confidentiality and privacy of the children, WWP EN must be notified of how the photographer or filmmaker intends to use the images, film or stories. WWP EN reserves the right to refuse use if it is felt that the photos, films or stories are not in accordance with our child protection policy and/or our media and communication principles.
- If an image or any material is to be used by another organisation, it must be credited to WWP EN/photographer with an appropriate caption.

## Accountability

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### Monitoring and Evaluation of the Policy

The aim of monitoring and evaluating the child protection policy is to learn from practical case experiences, which will inform policy reviews and changes.

WWP EN will regularly monitor the implementation of its child protection policy and procedures. Progress, performance and lessons learned are reported by the Child Protection Focal Person to the Executive Director and Chair annually and included in WWP EN's report to the AGM. Monitoring and evaluation will be done by checking whether the standards from the child protection policy are implemented and whether safeguards are working. This can be done by carrying out a periodic survey among WWP EN staff, interns and volunteers on how the standards of the child protection policy are being met, how effective they are and what needs improving.

Next to the overall monitoring and evaluation of the child protection policy, reactive monitoring will take place after incidences have occurred, which will contribute to a learning process for WWP EN and, if necessary, changes to the policy or reporting procedures.

Every three years, an internal review of the policy will be carried out, and the Board will approve its results.

## Annexe 1: OCRI Checklist (Organisational Child Risk Identification)

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Project/activity:

Date:

Team members:

### 1. CONTACT WITH CHILDREN

	YES	NO
DIRECT		
INDIRECT		

### 2. IMPACT ON CHILDREN

	YES	NO
DIRECT		
INDIRECT		

Description of the impact:

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### 3. CHILDREN'S NEEDS RELATED TO THE ACTIVITY and IN GENERAL

	NEED	MET	NOT MET



#### 4. IDENTIFIED RISKS

RISK	IMPACT	LIKELIHOOD	SCORE

LIKELIHOOD SCORE	LIKELIHOOD→				
IMPACT↓	1 RARE	2 UNLIKELY	3 POSSIBLE	4 LIKELY	5 ALMOST CERTAIN
5. CATASTROPHIC	5	10	15	20	25
4. MAJOR	4	8	12	16	20
3. MODERATE	3	6	9	12	15
2. MINOR	2	4	6	8	10
1. NEGLIGIBLE	1	2	3	4	5

#### 5. ADDRESSING RISKS

RISK NUMBER	MITIGATION MEASURE	RESPONSIBLE	DEADLINE

#### 6. ADDRESSING THE NEEDS OF CHILDREN (For needs that are not already met

NEED NUMBER	ACTIVITY	RESPONSIBLE	DEADLINE

## Annexe 2: Statement of Commitment to WWP EN Child Protection Policy<sup>7</sup>

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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, procedures and practices contained within this document while working or associated with WWP EN.

I further understand that adherence to WWP EN's Child Protection Policy will involve acceptance and commitment to WWP EN's Child Protection Policy. I understand that all staff, volunteers, interns and consultants are recruited to clear job or role descriptions that include a statement on the position or role's responsibilities to meet the requirements of WWP EN's Child Protection Policy.

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<sup>7</sup> to be included in the work/service contract

## Annexe 3: Recognising Signs of Abuse

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Recognising abuse is complex, and there is no simple checklist which allows easy recognition. You can be alert to potential warning signs, but they should be assessed with care. Do not automatically assume that abuse is occurring. However, it is important not to dismiss your concerns or ignore any signs of abuse; these should be discussed with the CPF as soon as possible to help decide the most appropriate action.

### Possible signs of physical abuse:

- Bruises, burns, sprains, dislocations, bites, cuts
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Withdrawal from physical contact
- Arms and legs kept covered in hot weather
- Unwillingness to participate in physical activities that may involve undressing, e.g. sports
- Fear of returning home or of parents being contacted
- Showing wariness or distrust of adults
- Self-destructive tendencies
- Being aggressive towards others
- Being very passive and compliant
- Chronic running away

### Possible signs of neglect:

- Frequent hunger
- Taking scraps of food from bins or plates or stealing food
- Poor personal hygiene
- Constant tiredness
- Inappropriate clothing, e.g. summer clothes in winter
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Low self-esteem
- Poor social relationships
- Compulsive stealing
- Drug or alcohol abuse

### Possible signs of emotional abuse:

- Physical, cognitive or emotional development is delayed
- Highly anxious
- Showing delayed speech/ sudden speech disorder
- Fear of new situations
- Low self-esteem
- Inappropriate emotional responses to situations
- Extreme passivity or aggression
- Drug or alcohol abuse
- Chronic running away
- Compulsive stealing

### Possible signs of sexual abuse:

- Age-inappropriate sexualised behaviour or highly sexualised language
- Bedwetting or soiling
- Anal or genital soreness
- Sleep problems
- Fear of being with adults
- Promiscuity
- Extreme risk-taking in adolescents

Possible signs of concern regarding adult behaviour:

- A person in whose presence the behaviour of a child significantly changes, such as becoming withdrawn, fearful, distressed or agitated
- Asking a child to lie or keep secrets
- Breaches of the organisation's Code of Conduct/behaviour protocols
- Initiating private contact with a child, in person or by e-mail or phone

## Annexe 4: Safeguarding Report Form

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### Child Protection Focal Point

Sandra Jovanović Belotić

E-mail: [s.jovanovic@work-with-perpetrators.eu](mailto:s.jovanovic@work-with-perpetrators.eu)

Phone: +381 642926039

If you know that a child might be at risk of harm, please complete this form to the best of your ability. Please note that child protection concerns must be reported (orally or in writing) directly to the Child Protection Focal Person at WWP EN (preferably within the same working day)

– depending on the urgency, you may wish to complete this form before contacting the CPF, or you may wish to complete the report afterwards.

The report should be written and signed only by you to guarantee confidentiality. It should be sent only to the CPF, who will hold it in a safe and secure place and treat it with the strictest confidentiality.

#### 1. About you

Your name:

Your job title:

Employer:

Nature of your contact with the child:

Contact details:

Tel:

E-mail:

#### 2. About the child

Child's name:

Child's gender:

Child's age:

Child's address:

Child's parents/guardians:

Has any treatment been given to the child? YES / NO

Treatment given by

Taken to hospital: YES / NO

If yes, which hospital and how:

**3. About your concern; Details of the incident**

Was the incident:

- observed by you?
- suspected?
- disclosed by someone else?

If the concern was shared by someone else, please state who and their relationship to the child:

What happened? Give cause (how and why) if known - If you include personal observations, please make a distinction between what is a fact and what is opinion or hearsay (e.g. child's emotional state, visible injuries, etc.):

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Did the child/young person or another source say anything to you [if relevant], and how did you respond to them: [Do not lead the child. Record exact details.]

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Date of the alleged incident:

Time of the alleged incident:

Location of the alleged incident:

Name of the alleged perpetrator (if applicable):

Were there any other children/people involved in the alleged incident? YES / NO

Are any other children at risk of harm? YES / NO

Action taken by you:

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Signature \_\_\_\_\_ Date: \_\_\_\_\_

**For completion by the Child Protection Focal person:**

Incident/Accident investigated:

Written investigation report necessary:

It may be appropriate to interview the parties involved to determine the cause of the incident or accident. Witness detail, statements, etc., can be added here

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## Annexe 5: No conflict-of-interest form

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I, \_\_\_\_\_ (name surname), don't have personal and professional ties with \_\_\_\_\_ (organisation, person) that could influence my objectivity in the process of managing the report on child safeguarding.

Date, place

Signature



## Annexe 6: General Consent Form

Your name and age	
Your address	
Your phone number	
Your mobile number (if available):	
Your e-mail address:	

Are you comfortable taking part in (e.g. meeting/event/etc.)? Please circle Yes or No:

Yes / No

WE WANT TO MAKE SURE YOU FEEL WELCOME AND COMFORTABLE TAKING PART

Do you have any allergies we should know about?  Yes / No	Details:
Do you have any additional support needs you'd like us to know about (physical or learning disability, mental health issues, low confidence, difficulties with communication, things you find hard to talk about)?  Yes / No	Details:
Is there anything extra we can do to make sure that you can come along and participate fully?  Yes / No	Details:
Are you taking any medication we should know about?  Yes / No	Details:
Do you have any dietary requirements?  Yes / No	Details:
If you practice a religion, please tell us if there's anything connected to taking part in the event that we should know about	Details:

<p>My Consent</p> <p>Signature:</p> <p>Location (where you live):</p> <p>Today's date:</p>	<p>Parent/Legal Guardian Consent (if under 18)</p> <p>This child/young person under 18:</p> <ul style="list-style-type: none"> <li>• is allowed to participate in ..... (event)</li> <li>• is allowed to take part in media activities at ..... (event)</li> <li>• has been informed about the ..... (event) goals, the voluntary nature of participation and anonymity in an age-appropriate way</li> <li>• has been informed that they can refuse to participate at any time with no consequences</li> <li>• is allowed to receive appropriate medical attention from a registered practitioner if at any time my child requires urgent medical attention,</li> </ul> <p>Full name:</p> <p>Relationship to child/young person:</p> <p>Location:</p> <p>Date:</p>
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## Annexe 7: Media Consent Form

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WE WANT TO MAKE SURE YOU FEEL COMFORTABLE TAKING PART IN MEDIA ACTIVITIES

WWP EN and its Communications Team are actively promoting ..... (e.g. activities/events/etc.). We publish photos and or statements of participants. In this way, we inform the public and decision-makers about ..... (event).

If you or your parents/carers are interested in following the WWP EN's work via social media, you can do this by following the WWP EN Facebook page and/or Twitter feed or the WWP EN website: [www.work-with-perpetrators.eu](http://www.work-with-perpetrators.eu)

➤ Is it okay for you to participate in visual documentation during the WWP EN (event)?

If you say it is ok, we might share photos, film, audio, writing or art on our website or social media; in our reports or leaflets; at our events; and/or in the promotion work we do to people around Europe who help to support children and adolescents.

Please circle Yes or No: Yes / No

➤ Is it ok for us to capture your voice in film, photos, audio, writing and/or art and to share this content in the ways listed above?

Please circle Yes or No: Yes / No

➤ Is it okay to tell people your first name when we share this content? (you can still take part in ..... (event) even if you don't want us to tell people your name).

Please circle Yes or No: Yes / No

➤ Is it ok for you to talk to the press during .....(event) (including photos, television/video/camera coverage)? All media interviews will be conducted in consultation with and in the presence of your accompanying adult and a WWP EN staff member. You have a right not to answer any questions you do not want to answer.

Please circle Yes or No: Yes / No