

HINTALOVON

Child Rights Foundation

Child Safeguarding Policy

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1. Mission of our Foundation

The mission of the Hintalovon Child Rights Foundation (hereinafter the Foundation), founded in 2015, is to promote and support the rights of children living in Hungary. The aim of the Foundation is for adult society to take on a responsibility on the broadest scale possible for the balanced development of children while taking into account the needs of children in all aspects of life. A further goal is to make Hungary a better place for children, where it is good to be a child.

The Foundation's work focuses on protecting children from violence, their right to education, and their right to participate in all matters that concern them.

The Foundation's programs include: Sexual Education for the Prevention of Sexual Violence against Children and Healthy Development (Yelon); free legal aid service to ensure proper representation of children in proceedings (Pro Bono Child Rights Centre); a program to develop children's awareness of children's rights and to ensure that their views are fully taken into account (Child Rights Ambassador Program) and the Nemecek Program (Child Safeguarding Policy Program for Schools and Organizations).

The Foundation is a member of the Organization, which sets international standards for child safeguarding policies. This document has been produced in accordance with the principles set forth by the organization and in accordance with the objectives of the Foundation to ensure the best interests of the children.

2. Scope of the Policy, commitment

The purpose of this Child Safeguarding Policy (the "Policy") is to ensure the safety and protection of children who are in contact with the Foundation in any way, and to exclude the possibility that the Foundation or any person providing services to (volunteer, traineeship agreement, etc.), or acting on behalf of the Foundation (hereinafter collectively, "staff"), and may be harmed by the Foundation's partners in the course of their activities.

A further objective is to enable the Foundation, upon suspicion of abuse or endangerment, to take effective measures to detect, adequately deal with and follow up on such cases, through the transparent framework set out in this Policy.

From the date of its adoption, the Policy shall apply to all areas of the Foundation's activities: they shall have binding force on the general operation and the individual programs.

The Policy is approved by the Board of Trustees of the Foundation. The Board of Trustees shall monitor the implementation of the Policy on a continuous basis, take measures within its competence and review them at least annually and whenever necessary.

The Foundation attaches the utmost importance to conducting its activities and operations in accordance with this Policy: the scope of this document and its annexes extend to anyone who cooperates with the Foundation in any capacity or acts on behalf of the Foundation.

To fulfil this, the Foundation is responsible for ensuring that all staff are aware of and understand their roles and responsibilities in the field of child protection, and act accordingly. The Foundation also cooperates with external organizations and individuals in accordance with the principles and rules laid down in the Policy.

In all cases, the Foundation takes the violation of the Policy seriously, and in any case, such cases cannot be without consequences.

3. Principles for security

Nothing in the Policy may conflict with existing legislation on the rights of the child or the protection of children, but the principles set forth in this Chapter may go beyond that. Where this Policy contains stricter requirements than those contained in the legislation, the rules of the Policy shall apply. The Foundation organizes its activities for the safety of children according to the following principles:

- **Protection:** all children, regardless of age, gender, ability, culture, race, language, religion, and gender, gender identity, gender expression and sexual orientation, have the right to protection;
- **Zero tolerance:** all forms of child abuse, violence, harassment, and abuse are unacceptable. A safe environment and community for children should be created and no professional relationship should be established – or an existing relationship should be immediately terminated – with anyone who poses a danger to children;
- **Child-centered:** the well-being of children is paramount, all decisions must be made in the best interests of the children and respect their rights;
- **Meaningful child participation:** child participation processes are in line with the ethical principles set out in General Comment No. 12 (2009) – The right of the child to be heard – of the UN Committee on the Rights of the Child;
- **Transparency:** all decisions, activities and procedural mechanisms are transparent and guided by the best interests of the children;

- **Prevention:** reducing the risk of child abuse should be promoted through awareness-raising, good practice, regular risk analysis and reduction, and training;
- **Individual responsibility:** ensure that all staff are aware of the rules of protection, but it is important that everyone is individually responsible for the safety of children;
- **Procedural guarantee:** all indications of children' rights violations, their mistreatment or endangerment of must be taken seriously and appropriate child protection measures must be taken;
- **Support:** all children, groups of children and staff involved in child abuse cases should receive appropriate support;
- **Co-operation:** cooperate with other civil, state and international organizations as appropriate, with particular respect to the members of the child protection alert system, bearing in mind that reconciling different perspectives and joint thinking on common issues will facilitate the most efficient handling of cases;
- **Follow-up and review:** child protection rules and practices should be regularly reviewed to identify and address any deficiencies and to comply with relevant legislative changes;
- **Secure data management and confidentiality:** it is required to treat confidentially, in accordance with applicable laws, the personal data and sensitive information of children;
- **Legal compliance:** the Foundation works in accordance with applicable international and domestic child protection regulations.

4. Key concepts

4.1 Who is protected by the Policy?

This Policy protects the entire community of the Foundation through the introduction of preventive tools and the establishment of transparent procedures, while at the same time supporting all members of the community in their commitment to the protection of children. However, it is important to underline that the Policy is primarily intended to protect children.

- **Child:** Anyone who has not reached the age of 18 and is in any form associated with the Foundation. The Foundation bears the greatest responsibility for the children who are in direct contact with it, such as members of the Child Rights Ambassador Program and Child volunteers, but also for the safety of children whom it occasionally meets in Foundation training, lectures, other programs, and in the office.
- **Child volunteer:** Volunteers under the age of 18 with whom the Foundation has a legal relationship.

- **Young adult:**
 - Volunteers who have reached the age of 18 but they are still in high school during their legal relationship with the Foundation.
 - The Policy also protects individuals who have been in contact with the Foundation as a child but have reached the age of 18 as a result of the partnership and have not terminated their legal relationship/partnership with the Foundation.

4.2 What does the Policy protect?

The Foundation condemns and finds unacceptable all forms of child abuse and maltreatment, even if the injury is only subsequently pursued; or not directly recognized by the child concerned.

The following concepts, as well as the possible signs of child abuse, should be understood by all staff at the Foundation. The Foundation will facilitate the acquisition of this knowledge through appropriate training.

- **Child abuse:** Anything that is done by individuals, institutions or procedures, or caused by an omission, that directly or indirectly causes harm to children or hinders their safe and healthy development into adulthood.¹ Forms of child abuse include:
 - **Physical abuse:** The use of physical violence that causes actual or probable physical injury or suffering.
Example: punching, shaking, burning, torturing, kicking, lashing, locking, pulling, dropping, poisoning, scalding, careless dropping, drowning, strangulation
 - **Emotional abuse:** A continuous and degrading emotional treatment that has a long-term and severe negative impact on the child's emotional development. Emotional abuse usually occurs in combination with other forms of maltreatment of the child, however, it can occur on its own as well.
Example: bullying, criticizing, belittling, prolonged stigma, detention and isolation, persuading a child to be worthless or inappropriate, refusing, denying emotions, setting expectations that are inappropriate for the child, or situations in which the child may witness violence between family members.
 - **Neglect, neglected treatment:** Persistent failure to meet a child's basic physical and/or emotional needs, which can result in severe impairment

¹ In line with the professional health policy guidelines titled 'About the duties of healthcare actors in cases of child abuse or suspected neglect' published by the Ministry of Human Capacities (EMMI), and any other relevant EMMI protocols.

of health and development. We also mean neglecting to prevent violence, abuse and abuse of children!

Example: No adequate food, clothing, shelter, supervision, access to health care and treatment, basic care and no harm, denial of basic emotional needs, indifference, emotional security, permanence, lack of affection, child emotional attachment gross neglect.

🟡 **Sexual abuse**: Behavior in which an adult uses a child to engage in activities that are not appropriate for the child's age or development to satisfy his or her sexual interest or desire. This includes anything that the child does not fully understand and to which he/she cannot give his/her true consent.

Example: Unfair stroking, touching intimate parts, sexually suggestive comments, comments, stories, online sexual activity, sexting, sharing sexually explicit pornography/showing children, or intentionally sexually explicit sexual activity. The full definition also includes exploitative and commercial forms of sexual violence, such as prostitution, pornography, sex tourism, forcing children to marry or genital mutilation.

Possible signs of abuse

Physical abuse

- bruising, burns, sprain, bite, cut
- unrealistic explanation of injuries, mistrust of adults, aggression towards others or themselves
- committing crimes, withdrawing from physical contact
- refusing to talk about injuries
- wearing closed clothing despite the warm weather, attempting to escape
- passivity
- fatigue
- children not wanting to go home
- etc.

Emotional abuse

- extreme anxiety
- fear of new situations
- drug and alcohol use
- extreme passivity and aggression
- retardation in physical, mental and emotional development
- improper emotional reactions
- compulsive theft
- regular escape attempts
- frequent headaches or abdominal pain that cannot be medically justified
- joining gangs
- sleep or eating disorder
- depression
- etc.

Neglect

- frequent hunger and food theft
- poor personal hygiene
- constant tiredness
- low self-esteem
- untreated health problems
- frequent delays or absences from school, poor social relationships
- frequent illness
- etc.

Sexual abuse

- a seemingly unjustifiable change in social behaviour (self-imposed or very challenging)
- excessively sexualized, unacceptable or anti-social behaviour
- sexual toys
- withdrawal from touch
- sexual knowledge beyond a certain age
- the sudden emergence of sexual hygiene
- involvement in prostitution
- decline in development
- etc.

The signs of forms of abuse are interrelated and often overlapping, so it is important that school staff are always able to detect signs that the child in question is being mistreated in their environment, and the necessary steps should be taken.

- **Financial abuse:** Any unauthorized regulation or restriction of the finances of the child concerned
Example: withholding money to cover basic needs, unauthorized use of the person's money, non-payment of promised volunteering reward
- **Online harassment:** Causing a series of intentional and prolonged harassment on the Internet, which may include humiliation, threat, bullying, exasperation, denigration, or denial.
Example: posting offensive, abusive messages on someone's newsfeed/profile or in a personal message, hacking an account, creating a fake profile, uploading abusive photos/videos. Possible signs include anxiety, profile deletion, change of Internet usage habits, school absconding, escape, etc.
- **Accidents:** An unusual/unexpected/unintentional event, the occurrence of which is not obvious or unplanned, and generally has a negative outcome that could have been avoided prior to its occurrence. According to international protocols, some accidents are classified as physical violence. The Foundation provides accident prevention and a first aid kit in each office.
- **System abuse:** Occurs when an activity or system to protect children is non-existent or dysfunctional and contributes to omitting prevention, delaying, or continuously/further damaging the abuse and neglect.
Example: Child abuse in the context of system abuse is when the detection or suspicion of abuse is not followed by intervention, that is to say, to signal and take action to help, protect and investigate the child who has suffered the abuse.
- **Endangerment:** When a child's physical, mental, emotional or moral development is hindered or impeded by any circumstance, such as his or her own behavior or that of another person. Serious endangerment is defined as abuse or neglect of a child that exposes the child's life to imminent danger or may cause significant and irreparable harm to his or her physical, mental, emotional, or moral development. It is important to note that, both in the standard case and in the case of a serious endangerment, the danger itself is considered to have been realized even if it does not actually result in damage or a disadvantage.
An example of endangering physical development: physical abuse, starvation, etc.
An example of jeopardizing intellectual development: failing to fulfill a child's school attendance, etc.
An example of jeopardizing moral development: violent or sexual acts in the presence of a child, etc.
An example of jeopardizing emotional development: regular humiliation, intimidation, etc.
- **Exploitation:** Unfair exploitation of a child.

Example: Child labor, carrying out work with a child that presents a high risk, endangers the child's education, health, or may be harmful to his or her development, sexual exploitation.

- **Commercial exploitation**: the exploitation of a child for commercial or sexual purposes, whether for pecuniary or financial gain. Typically, the exploiter entices the child through deception, false promises (love, relationship security), intimidation, physical or psychological terror, or threats.

Example: child prostitution, child pornography, pickpocketing, forced solicitation

- **Not real child participation**: when a child is not aware of the purpose, process or role of his or her participation; his participation is not voluntary and is not based on respect for his/her opinion and dignity. Children are not involved in issues that are not relevant to them, in non-child-friendly settings, or in non-discrimination; they are not properly prepared for their role, their safety is not a priority and the results of their participation are not accountable.

5. Procedural protocol

5.1 Reporting mechanism

The Foundation takes all suspicions, signs and signals of child abuse or endangerment seriously. Accordingly, it will investigate the matter and promptly take the steps outlined in this signaling process.

The Head of the relevant program of the Foundation shall inform each member of staff at the very beginning of the cooperation orally about the signaling system and the contact details of the Policy Compliance Team.

If anyone among the staff of the Foundation	
as part of the operation of the programs – such as the <i>Child Rights Ambassador Program</i> , the <i>Yelon</i> , the <i>Pro Bono Child Rights Centre</i> , or the <i>Child Safeguarding Policy Program</i> as well as in online and offline communication	during an external lecture/training
detects signs of child abuse	



On the day of detection	
an internal report to the Policy Compliance Team ²	sends a report directly to the contact person at the partner organization. The observer shall, within 30 days of the alert, request in writing information on the action taken in the matter
	Depending on the nature of the case, the observer may, where appropriate, give an internal report to the Policy Compliance Team (e.g. the contact person is suspected of being abused)

² The Policy Compliance Team consists of two individuals: the current head of the Pro Bono Child Rights Centre and a designated psychologist colleague of the Foundation.

- The observer can report in to the detector in writing through the following Google form, which is accessible only to members of the policy enforcement team: <https://forms.gle/C7owHsvmZ1MNQFCy6>
- It is also possible to report anonymously through the form
- If the applicant does not have an account or internet connection he/she can report in person,³ or via the Child Protection Reporting Form (Annex 1.), which he/she can drop into the Foundation’s mailbox
- He/she should also contact the program manager of the program concerned



The Policy Compliance Team will immediately investigate the circumstances of the case upon receipt of the internal alert: it will carefully evaluate the information it receives and, if necessary, collect additional information to clarify the case, which may include the involvement of relevant staff.

- The Policy Compliance Team shall in all cases:
 - take the necessary steps to avoid further danger
 - provide advice and information to those affected by the case
 - make confidential and archive the alert within 24 hours of being notified of the incident
 - within 72 hours, discuss the next steps with the affected staff
- If justified by the best interest of the situation/child concerned:
 - provides the processing staff with a supervisory watch/discussion circle
 - informs the child’s legal representative
 - convenes a case study to investigate what measures are needed, what professionals (lawyer, psychologist, psychiatrist, doctor), external organizations or formal proceedings are needed
 - consults with the Foundation’s professional team
 - initiates case discussions with other members of the child protection system
 - involves the Chairman of the Board of Trustees in an internal investigation if a signal concerns a member of the Policy Compliance Team



If warranted by the results of the internal investigation, the Policy Compliance Team will be responsible

³ The Foundation will inform all staff of the contact details of the Policy Compliance Team.

<p>to forward to the child restraint system within 72 hours in case of a suspected serious threat, or within 8 days in case of a suspected threat</p> <p>(depending on the information available, to the competent family and child welfare service/guardianship authority/police/other child protection services)</p>	<p>to immediately informs the Chairman of the Board of Trustees</p>
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- The Chairman of the Board of Trustees, if necessary:
 - will consider whether any policy needs to be amended
 - examines whether the employee training plan should be changed
 - initiates appropriate proceedings to hold the employee concerned accountable
 - examines, with regard to employees, what labor law measures may be taken: disciplinary action, termination of employment, dismissal, etc.
 - examines what measures can be taken for volunteers: immediate suspension, termination of the volunteer agreement etc.
- An investigation, suspension or resolution does not constitute a presumption of guilt, but is intended to serve the safety of all parties for the duration of the investigation.
- There are consequences for any employee who fails to make a mandatory statement, deliberately reports in bad faith, or is involved in a child abuse case. The consequences always depend on the gravity of the case and the legal relationship.

5.2 Confidentiality protocol

<p>Description</p> <ul style="list-style-type: none"> ● intense work with a child who has been abused ● it is recommended that the trusted adult follow and apply with whom the child shared the secret, who told them about the event (s) he or she was experiencing, which should be shared with others according to the signaling protocol ● the point is that the trusted adult should not share the secret, nor ask the person concerned to share it until the child himself or herself has been able to talk about it (because he or she is ready to release the secret, so it can be avoided and outsourced) ● you have to go through the process and work with the person involved, talk to them to understand why it is important to talk about what happened to

others,

- it is important that the child has time to prepare and accept the consequences of what might happen (e.g. proceedings will be initiated):
 - have a way to get enough information
 - be provided with a reasonable amount of time to understand exactly what procedures they are about to face

The Confidentiality protocol must be familiar to all staff. If the primary report of abuse is from a child related to the Foundation, the person who first hears the report should do the following:

- listen carefully to the child and accept what you hear;
- shall not put too much pressure on the child to learn more details;
- reassure the child that he/she has made the right decision to share his/her story;
- inform them that this information should not be kept secret and should be shared with the competent persons;
- also tell him/her what the next steps are going to be in this case;
- after an immediate situation assessment and risk analysis, make every effort to ensure that the child concerned is safe;
- contact the Policy Compliance Team immediately for case counseling and be careful not to reveal the child's identity until it is absolutely necessary or authorized by the child.

The Policy Compliance Team when using the Confidentiality protocol:

- immediately informs the head of the Foundation about the case and the application of the Confidentiality protocol
- organize regular meetings with the staff involved in the case
- informs the child protection alert system of the use of a Confidentiality protocol for a child in accordance with the individual needs of the child

5.3 Dealing with past cases

The Foundation also takes those signs and signals seriously that happened in the past but stayed hidden from members of the Foundation. Likewise, the handling of these cases takes place with the utmost professionalism in accordance with the principles and responsibilities prescribed by the Policy.

In handling past cases we would like to help adults that were hurt as children at the Foundation process what happened to them, and find closure. Moreover, we believe that getting to know past cases can lead to increased safety for children contacting the Foundation today.

Process for signalling past abuse cases:

- **Signalling:** the complainant turns to a member of the Foundation, who directs him/her to the Policy Compliance Team.
- **Personal contact.** The complainant meets the Policy Compliance Team in person at the Foundation. The aim of the first meeting and conversation is:
 - to become acquainted with the past case
 - to become acquainted with the needs of the complainant

If the parties determine that others (members of the Foundation or external professionals) need to be involved for adequate clarification and handling of the case, then they discuss together the scope of the professionals to be involved and the next steps.

- **Agreement and closure.** Successful handling of past cases of harm means that the Foundation becomes acquainted with the case and, in accordance with the needs of the complainant, offers help processing past harm and finding closure. Help takes a mental or psychological form and it may never be financial compensation.
- **Information and documentation.** In cases of past harm, it is the Child Safeguarding Policy team's responsibility to inform the head of the Foundation, and to document in accordance with GDPR regulations. They will follow the guidelines pertaining to cases involving children as prescribed above.

6. Areas of responsibility

6.1 General responsibility

The Foundation undertakes the responsibility to ensure that the functioning of the organisation and the preparation, implementation, and follow-up of its projects are all performed in accordance with the Child Safeguarding Policy and with the highest possible level of diligence. It is also their responsibility to ensure that every child, employee, and partner in contact with the Foundation is familiar with the Policy.

In addition, every employee is individually responsible for complying with the Policy when performing work for the Foundation, by avoiding any infringement, abuse of personal information, or posing any threat to the safety of children.

Accordingly, all employees are obliged to:

- actively and supportively contribute to the protection of children's rights;

- participate in the training provided by the Foundation to raise awareness of their responsibilities laid down in this Policy;
- perform their work in accordance with the Policy and the principle of reasonable diligence;
- understand and sign the Code of conduct of the Policy (Annex 2.), and any other documents relevant to them;
- ensure the protection of children during appearances and communication with third parties in connection with the Foundation's projects.

6.2 Responsibilities of the Chairman of the Board of Trustees

- introduce the Policy; keep track of and monitor its implementation; evaluate professional interventions and actions taken based on the Policy;
- ensure that children coming into contact with the Foundation are familiar with the relevant parts of the Policy;
- ensure that all employees are aware of their responsibilities laid down in this Policy, and are provided with the necessary preparation and information;
- ensure that all employees sign the Code of conduct of this Policy (Annex 2.) and any other relevant document;
- carry out proceedings of prosecution if necessary.

6.3 Responsibilities of the Policy Compliance Team

- in the case of suspected abuse, initiate and take internal protection measures as well as measures towards external authorities, each laid down in the Policy (report analysis, external report, information, archiving, feedback etc.)
- coordinate the implementation of protection measures;
- contribute to the introduction and implementation of data protection regulations and of a recruitment process with the relevant safety components – in cooperation with Foundation members who have responsibility in the areas above;
- manage documentation related to areas specified in the Policy, in accordance with GDPR;
- immediately report to the Chairman of the Board of Trustees when the Policy Compliance Team is affected by an anomaly whose resolution is the responsibility of the head of the Foundation;
- submit a report to the Board of Trustees on a yearly basis and holding additional presentations whenever necessary;
- provide assistance to victims of child abuse by advising them of other platforms they may turn to ask for help (law clinics, victim protection bodies, authorities etc.)

6.4 Responsibilities of the Child Rights Ambassador Program

The Child Rights Ambassador Program holds primary responsibility for the protection of *Child volunteers* participating in the Foundation's programs.

6.5 Responsibilities of the Foundation's expert team

The Foundation's expert team is an independent advisory body consisting of professionals representing a variety of areas – such as trauma processing, child psychology, peer bullying, pedagogy, law, and sex education. They also have an insight into the Foundation's work and values.

The Foundation's expert team's primary responsibility is to provide counselling, consultation, and professional feedback concerning the programs, projects, and general strategy of the Foundation.

The members of the Foundation's expert team are invited individually to cooperate with the Foundation members in various child protection issues that require, based on the opinion of the Policy Compliance Team, the involvement of professionals to provide an external and objective approach.

7. Protection and personnel-related matters

7.1 Recruitment process

It is very important for our Foundation to recruit personnel who are reliable and bear in mind the enforcement of children's rights.

The recruitment of new personnel is the best opportunity for the Foundation to minimise the risk of child abuse. The fulfilment of each position must be preceded by a strict admission procedure as our co-workers are given access to personal data and may be in contact with children.

Accordingly, the Foundation performs a thorough background check in the case of each candidate: if they have committed any offence against minors or threatened children, or if the prior checks reveal that any atrocity, crossing of a line, complaint or excuse played a part in them changing jobs, they should not be offered a position at the Foundation.

No employee may start working for the Foundation unless they acknowledge and sign this Policy and its relevant annexes. In exceptional cases, the recruitment process may be shortened and the applicant may start their work immediately, but

only on the condition that they comply with the Policy. Records should be kept of the recruitment process as well as of employees who were recruited successfully.

Requirements that apply to every position:

- requesting a CV and cover letter
- conducting a personal interview
- a certificate of good conduct that was issued no earlier than 3 months ago
- a letter of recommendation with the contact details of the recommending person (not necessary for volunteers)
- qualification and training necessary to fulfil the position
- upon signing the agreement, the candidate accepting the offer should also sign the Code of conduct included in the Policy, stating that they:
 - are not banned from practicing any profession
 - are not banned from participating in public affairs
 - have never been convicted of any intentional offence
 - have never been on a trial for committing child abuse or sexual harassment,
 - and no investigation was carried out against them in this matter

Participation in the recruitment is obligatory for everyone, but depending on the nature of jobs and duties, there may be procedural differences:

- For new entrants and collaborating experts – working as registered employees, sole traders, or under simplified employment – there must be a probationary period of 3 months.
- New employees are obliged to participate in a child rights training which is held semi-annually by the Foundation as part of the recruitment and commitment process.
- The recruitment of occasional volunteers always requires the consent of the leader of the project in question. Before starting work, volunteers are required to sign the *Guidelines for occasional volunteers and visitors*, which is to be found under Annex 3 of this Policy.

7.2 Trainings and support

The probationary period provides the opportunity for new employees to get familiar with and to understand the Policy, both on a theoretical and a practical level.

New employees must participate in a compulsory training and complete the questionnaire which is prepared by the Foundation in connection with the Child Safeguarding Policy.

Occasional volunteers and visitors should be supervised by Foundation employees that are working on the same projects.

Foundation employees and volunteers are both provided with the latest information about the Foundation and the projects they are participating in. Depending on the nature of work and experience, the Foundation may provide supplementary training to ensure children's well-being and protection.

The Chairman of the Board of Trustees is responsible for providing support to employees and volunteers, and always takes any request for help related to child protection seriously. Accordingly, he/she regularly provides the opportunity of supervision of employees working with children. In addition, he/she provides the necessary support and preparation for anyone who gives testimony in a proceeding related to child protection as an employee or volunteer of the Foundation.

The Foundation provides the suitable forum for every employee in case they wish to report a violation of any sort.

The Foundation provides access to this Policy to every employee in an electronic and printed format, and it is also available on the Foundation's official website to the general public.

7.3 Partners

The Foundation is in cooperation with a wide variety of partners: international and civil society organisations, law firms, sponsors, etc. In selecting partners for cooperation, the Foundation pays special attention to the potential partner's suitability, child-related procedures, former experience, and internal policy.

Partners who get in any form of contact with children through the Foundation must accept the present Policy, and in the agreement they conclude with the Foundation they must acknowledge their commitment in this regard.

In addition, the Foundation and its partners mutually support each other in child protection matters by exchanging knowledge, best practices, and resources, whenever necessary.

8. Communication

8.1 General communication guidelines

The Foundation is responsible for ensuring that the communication with children, about children or about their personal stories, online or in print or at events, happens in an ethical and responsible manner. Therefore all employees are obliged to act according to the following general guidelines:

- The dignity and the rights of the child is always to be respected.
- During communication particular care should be taken to the prevalence of child's rights – including the right to privacy, freedom of expression, the right to participate in cases regarding them and the right to have protection against violence or against danger of violence.
- You should always act in the best interest of the child.
- In cases regarding them, their opinion should be taken into consideration according to their age and maturity.
- Before all public communication, physical appearance or event, its political, social and cultural effects should be conferred with those close to the child and those who can best evaluate the child's situation (particularly the *Child volunteers*)
- Stories that could put any child in danger cannot be used, not even if said child's identity is changed or distorted, or is made unrecognizable in other manner.
- You should abstain from any comment or behaviour criticizing children.
- The employees of the Foundation can, as a general rule, only communicate with children in an open, secure place with at least two adult colleagues being present at the same time. If this cannot be arranged, the consent of the child and its legal representative should be asked, so that the employee trained in these guidelines – with the possibility of withdrawal – can communicate with the child under different circumstances than what is described herein.

8.2 Guidelines for written communication

- Descriptions and categorisations which negatively discriminate or exclude children should be avoided.
- When communicating with the members of the child protection signal system, special care should be taken to ensure that the written material presenting the child's story is always accurate and shows the events in context (especially the Pro Bono Child Rights Centre)
- In anonymised case studies published by the Foundation the name and age of the child should always be changed, so the recognition of said case, even with the anonymisation, could be avoided.

- In some cases the use of a child's identity (name, recognisable picture) serves the child's best interest. But even in these cases the child should be protected from potential harm and condemnation.
- In the case of any published written material published on the homepage (if the mentioned child can be recognised), said child has to be adequately informed about publishing and the possibility of deleting it (especially regarding the Child Rights Ambassador Program)

8.3 Guidelines concerning the making and usage of image-, sound- and video recordings

The Foundation can, to document its projects and during the internal and external communication regarding said project, make recordings of children participating in the project, and is free to use them (especially the Child volunteers). Here the following guidelines should be implemented:

- Image-, voice- or video recordings can only be made in relation to the projects of the Foundation, while the children's dignity remains intact.
- Before making any recording, permission should be sought from the child concerned, and a written permission from the legal representatives should be acquired every time. The permission is considered valid only if the child has been given information about the purpose of the recording according to their age and needs.
- Without consent, no recordings can be made of the child, or they cannot be used.
- The personal data of the child (name, address, date and place of birth, etc.) cannot be presented in the recordings. The Child volunteers are an exception, as their full name – in compliance with the General and written communication guidelines' recommendations – can be present in articles about them, or during television appearances.
- It should be made certain in every case that the child is partaking in the communication without any external forcing, on their own will. When making film, video or radio interviews, the impact of the visual- or sound effects on the child should be taken into consideration.
- The child and his/her legal representative should be informed about the publishing of the recording, its purpose and duration, and the possibility of removing said recording.

9. GDPR

9.1. Safe data handling and secrecy

The Hintalovon Child Rights Foundation handles personal data with the utmost care in accordance with the prevailing legal requirements and the security rules of the organization.

Employees associated with the Foundation will keep personal information of children they become aware of confidential. All employees are bound by the obligation of discretion and confidentiality. In pursuance of this section, information about the circumstances of children, young adults and every person associated with the Foundation, any personal information shared about or by them, may not be disclosed to third parties.

Exceptions to the rule:

- explicit written consent of the data subject to share his or her personal data (in particular when resorting the legal aid service of the Pro Bono Child Rights Centre
- if child abuse is suspected, the Policy Compliance Team (Chapter 6.3.), as a member of the child protection signal system, has an obligation to report to the child protection authorities

When conducting a research within the framework of any program of the Foundation, the organization shall, where appropriate formulate and adhere to specific privacy policies, taking into account its specificities.

9.2 Online safety

To filter out any abusive content on any device owned or used by an employee of the Foundation during the implementation of a Foundation project, a filtering/content blocking program or application is required if it is accessed or used by a child associated with the Foundation. Employees should notify the program manager immediately if any abusive or offensive content has been received. Program managers will ensure that such content is properly reported and deleted.

The Foundation encourages children to use the various tools of the internet and social media in a safe manner. The Foundation manages the communication and supervises the safety of the participants on its official, accessible communication interfaces.

Staff members can only communicate with children online via their official email address (firstname.lastname@hintalovon.hu).

The Foundation hides and does not show personal email addresses in newsletters and circulars. The online database is protected against unauthorized access.

10. Follow-up and audit

After approval by the Board of Trustees, the present Child Safeguarding Policy will be introduced via the following steps:

- Integrating the Policy into the existing policies and processes of the Foundation (strategic planning, recruiting, operations, founding documents, labor and volunteer agreements).
- Training all personnel affected by the Policy.
- Informing partners and allies of the Foundation about the Policy, as the future basis of cooperation.
- Informing the Child volunteers of the Foundation about the Policy, especially about the alerting mechanism meant to ensure child safety.
- Publishing the document on the website of the Foundation and in print in the office.

After introducing the Policy, the Board of Trustees will commit to the following on a yearly basis:

- Supervising the application of the Policy in daily operations based on the yearly report written by the team in charge of the enforcement of the Policy.
- Evaluating the effects of the Policy on colleagues, children and partners.
- Auditing whether any parts of the Policy or the educational structure need reforming.
- The findings of the audit will be summed up in writing for the Board of Trustees by the Chairman of the Board of Trustees. The findings will be approved by a majority vote or sent back for complementing or revision.

If necessary, any colleague can be involved in the evaluation and auditing.

11. Legal regulations

The present Policy is in keeping with the current domestic and international regulations in effect, especially:

- The United Nations Convention on the Rights of the Child (enacted as Act LXIV of 1991),
- Act XXXI of 1997 on the Protection of Children and the Administration of Guardianship (Child Protection Act)
- Act V of 2013 on the Civil Code,
- Act C of 2012 on the Criminal Code,
- Act I of 2012 on the Labor Code,
- Universal principles and methodology to recognize and prevent child abuse as part of the child protection alert system,
- Protocol of the Ministry of Human Capacities on family and child welfare services,
- Act CXII of 2011 on Informational Self-determination and Freedom of Information (Privacy Act).

12. Additional child protection provisions linked to the Foundation's activities

12.1 The Child Rights Ambassador Program and the voluntary participation of children in the work of the Foundation

The Foundation pays special attention to the protection of its under 18 volunteers and to ensure their meaningful participation. This chapter focuses on the involvement of children in the Foundation's programs and projects and provides guidelines for specific issues.

Preparation

- **Devotion**

The Foundation is devoted to creating the material, personal and time requirements for the true and meaningful participation of children. *Our members responsible for Child volunteers* have to be prepared to ensure real participation of children, thus, they are to receive the necessary support and training to be able to do so.

- **Recruitment**

Children can join the Foundation's programs through an open invitation. The process and aspects of participation shall be transparent. No one may be subjected to discrimination and specific steps have to be taken to ensure that the volunteering program is inclusive for all children.

- **Informing the legal representative and the school**

- The Foundation makes sure that the legal representatives of *Child volunteers* receive proper information in advance, covering the scope and framework of the cooperation, including the role and participation of the child, the Child Safeguarding Policy, means of communication, data protection, photo taking, as well as the responsibility of the legal representative. The *Child volunteers* sign a volunteer agreement to express their approval for joining.

- If possible, preparatory talks should be organised for the legal representatives. During the participation, legal representatives are generally informed via e-mail.

- The school of the *Child volunteer* shall be informed of the volunteering. The legal representative provides information on the contact person of the school.

- **Joining**

- The Foundation shall ensure that it receives information from the legal representative on the special needs, dietary requirements and health of the child prior to the cooperation.

- Children may be involved in programs that are relevant to them and build on the knowledge and experiences of the *Child volunteers*.
- Participation in the programs of the Foundation shall be based on voluntary and informed consent. Children may at any time interrupt or terminate their participation. Children shall be informed in advance of the aims, means and use of their participation in a manner that is appropriate for their age and maturity.
- The Foundation shall ensure that children receive all relevant information and support for their participation in advance.
- It shall be ensured that all materials and descriptions are developed to be suitable for the children. These materials shall be made easily available for all participants.
- The cooperation is preceded by a preparatory session to introduce the project, the Foundation and it's workers to the *Child volunteers*, as well as the volunteers to each other and to prepare for the project.
- *Child volunteers* receive regular trainings and support to ensure their responsible, confident and safe participation in the Foundation's programs.

Participation

- **Means of participation**

- The transparency of decision-making shall be ensured, so that children may participate to the best of their capacities. Initiatives by children have to be given a growing priority.
- Child volunteers have to be granted the opportunity to freely express their opinion in all circumstances. The opinion of children shall be respected.
- All steps shall be taken to create and maintain a safe and comfortable environment for children.
- The participation of children in the Foundation cannot violate their right to education and the right to leisure and freetime.

- **Internal meetings**

- During meetings held with the participation of children – in line with the general communication principles – at least 2 employees of the Foundation have to be present. An adult cannot (except for sudden emergencies or other extraordinary circumstances) be left alone with a child. If the presence of 2 employees cannot be provided, the child has to be met at a public place or be taken there.
- The Child volunteers have to be told of the schedule of the meetings beforehand.
- The place of meetings shall be the postal address of the Foundation at any given time. A physical environment comfortable for children has to

be facilitated. Getting to the meetings shall be the parent's responsibility. The employees responsible have to enquire about children's usual route and way of travel.

- The safety of electrical devices used by Child volunteers have to be ensured and provided with firewalls.

- **Online programs**

- Online conversations and meetings are to take place on a platform deemed to be safe, acceptable and user friendly for children by the Foundation. If necessary, employees of the Foundation can give online courses for children on how to use these platforms.
- During online conversations an effort must be made to avoid an employee being left alone with a child. If it is not possible to involve more adults in the conversation, the employee must be in a public place during the conversation.
- During online conversations and meetings an effort must be made to create an environment where children feel comfortable and safe. For instance, making webcam use optional, or hiding the background may make surroundings more comfortable.

- **External activities**

- Every online and offline activity is called an 'external activity' where participants are not exclusively Foundation employees and/or it is held outside of the current office of the Foundation.
- Specific attention has to be paid that the provisions of this Policy are also upheld during the Foundation's external activities. This increasingly applies to public or media appearances.
- It has to be ensured that participation during external activities is in line with the current Policy and external partners have to be supported and informed of the requirements for the ethical and meaningful participation of children.
- If the above are not guaranteed, the endangering situation has to be abandoned immediately.
- Participation in external activities shall be based on transparent, equitable and inclusive selection.
- Efforts shall be made to ensure that the date and time of these activities do not compromise Child volunteers' right to leisure and freetime or their mandatory education. Participation in events held during school hours shall be the responsibility of the legal representative, nonetheless, the Foundation shall make sure beforehand that the legal representative signed the necessary documents to justify the absence

from school. Travelling to external activities is agreed on a case-by-case basis and it is the responsibility of the parent.

- Media appearances:
 - Child volunteers may only participate in external activities with an accompanying Foundation employee and may only give an interview in the presence of the Foundation's representative. The Foundation is responsible for acquiring a written permission from the legal representative specifically related to the media appearance.
 - Multi-day or international travels
 - Prior to multi-day or international travels the legal representative shall be informed and his or her specific permission is required.
 - Children's opinions shall be taken into account when allocating the rooms.
- **Participation in research**
- Research involving children that is carried out by the Foundation must be in line with the Policy and genuine child participation guidelines. This applies to research goals, subject matter, methodology, and communication.
- **Feedback**

The Child volunteers may give feedback on the cooperation and their experiences after every meeting. The end of any project shall include joint evaluation and anonymous feedback should also be made possible. The Child volunteers give feedback on their experience every half a year. Children shall be informed of the result of their participation and how the results will be interpreted and used.

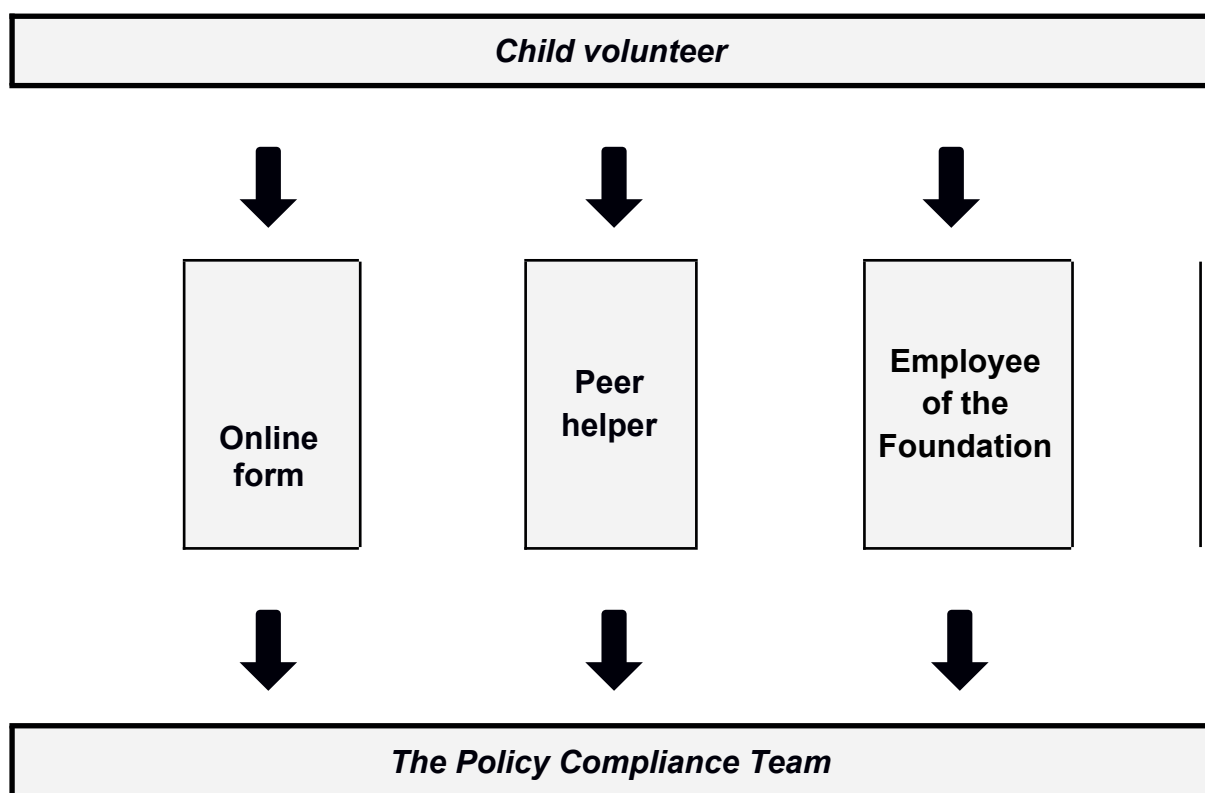
Safety

- **Risk assessment**

The Foundation carries out risk assessment before all of its projects involving children participation based on the ethical principles of meaningful participation, and if needed, consults the Policy Compliance Team and the professionals of the Foundation. The Foundation works to make the methodology of risk assessment and child participation available to all.
- **Emergency**
 - 🟡 In case of emergency the legal representatives of the child shall be contacted without delay, and if needed, the emergency services as well. In case of a medical emergency immediate medical help shall be provided. The information received from the legal representative beforehand and the volunteering agreement shall be taken into account.
 - 🟡 If the child does not show up to an arranged meeting even after 30 minutes after the agreed time, the legal representative shall be notified.

- **Complaint mechanisms**

- The Child volunteers shall be informed of the signal mechanism and of the contact information of the Policy Compliance Team in a manner appropriate for their age and maturity, and they shall be supported to be able to use it effectively.
- The Child volunteers may directly or indirectly notify the Policy Compliance Team if they encounter behaviour that violates their dignity or safety related to their involvement with the Foundation.



- Via an online form, that allows anonymous notification and shall be made easily available for them: <https://forms.gle/C7owHsvmZ1MNQFCy6>
- Through a peer helper designated specifically for this task. The peer helper is a young person with whom the Child volunteers share a bond of trust, making it easier for them to articulate and signal their worries or troubles.
- Through the employees of the Child Rights Ambassador Program.

The signals reach the Policy Compliance Team, the Team then immediately begins investigating and taking the necessary steps in line with the general procedure.

Restoration of the wrongs or harm done to the Child volunteers shall be promoted.

Communication

- **Contact**

- Internal communication

- Contact with the Child volunteers shall always comply with child protection rules and respect the child's right to privacy. In order to guarantee so, online communication on behalf of the Foundation shall be done via the official e-mail addresses provided by the Foundation in a way that at least 2 adults have access. Calls shall also be made only in a way that ensures that at least 2 adult employees of the Foundation may be witness to it (e.g. online group or from the office).
- The Foundation shall not initiate online or phone communication before 7 a.m. or after 8 p.m. with the Child volunteers, excluding extraordinary circumstances. The Child Rights Ambassador Program provides a weekly meeting option for the Child volunteers, with prior notice.

- External communication

The Child volunteers communicate on behalf of the Foundation through its official social media platforms or e-mail addresses. The social media platforms used by the children are accessible by the employees of the Child Rights Ambassador Program. The Child volunteers shall initiate external communications after prior preparations with the adult members.

- **Privacy and data protection**

- The taking of any photographs or the making of any voice or video recordings of the Child volunteers and the professional use of these materials by the Foundation is based on the prior written permission of the child's legal representative and the child. This is governed by the Child volunteer's volunteering agreement. The use of such recordings, for anything other than the general activity outlined above, such as for particular campaigns (e.g. in the forms of posters or brochures) requires the specific permission of the Child volunteer. Furthermore, the use of recordings in connection with press events shall require the specific permission of the Child volunteer's legal representative.
- The Foundation uses in its external communication the full name of the Child volunteers (first and last name), nevertheless, upon request by the child the communications may be done using only the first name, the initials or a fictional name for the child. The Foundation makes no

reference to the social media profiles or to other personal data of the Child volunteers.

12.2 The Yelon program

Principles, approach

The Yelon program provides information for young people between 10-18 about questions concerning their bodies, relationships and sexuality or other current issues in the forms of visual and textual contents on the webpage () and direct, private and anonymous conversations on chat. Children have the right to get proper information, however, communicating with children about sexuality poses high risks, thus for their safety, this present policy in the Yelon program is completed by the following special rules.

Webpage: content development

When editing the textual and visual contents of the webpage, the editorial staff of Yelon program (professional and child lecturers, editors, proofreaders) pay special attention to the safety of each child, therefore, in every situation whenever possible, the decisive age group is the youngest generation (10 year olds). For children's safety, during content development, the editorial staff should

- respect each child's worldview
- avoid phrasings that expose children to negative discrimination or exclusion, including LGBT+⁴ topics
- ensure that none of the texts are frightening or sexualizing
- ensure that texts are built up following a gradual approach: every article begins with more general information and proceeds towards more detailed and sensitive information thus providing the opportunity for children to leave the webpage whenever they want according to their own needs
- ensure that in cases of virtual content on the webpage, they do not use the recognizable image of a child under 18 (or a seemingly adult person)
- pay special attention that none of the visual content is sexualizing or frightening, to this end, we prefer graphics and not photos in case of a sensitive topic
- if a certain article contains an explicit visual image (e.g. graphics about genitals), they should indicate it and put it in context at the beginning of textual content
- strive to use links navigating from the web page to other webpages (e.g. when indicating the source of an image) that do not endanger children's safety

⁴ Lesbian, gay, bisexual, transgender, queer etc., non-heteronormative identities

For children's highest level of safety, every content published on the web page of Yelon is made through the following process and method:

- the invited author writes the article on the topic pre-arranged with the editorial staff and considering the principles of Yelon, paying special attention to the age group; in rare cases, the editorial staff asks for permission to republish (or translate, if needed) an article originally published online or offline according to the thematics and principles of Yelon and written in Hungarian or in any other language
- the finished/permitted to be republished/translated article is commented by at least two professional (one or two psychologists and another expert depending on the certain topics, like a doctor) lectors and at least two student lectors between 14–18, paying special attention whether the content and its language correspond to the principles of the Foundation and Yelon; during the process of lectoring the text, lectors make suggestions for corrections and modifications
- if necessary, after lectoring has taken place, the editors contact the author of the article who revises the article in light of the remarks and suggestions of the lectors
- after lectoring (and if necessary, after the revision made by the author) editors edit the text (language and formatting issues) and choose the proper images for the article providing that the content ready to be published corresponds with the regulations of Yelon
- the finished text of the article is corrected by the corrector (use of language) and if needed, the corrector suggests further modifications in the text (copy editing)
- after proofreading (and if needed, after further revision) editors publish the article

Contents for adults found on www.yelon.hu/szuloknek webpage should correspond to the principles governing the content made for children.

Chat: choosing and training of moderators, functioning of the chat

Yelon chat has an especially high security risk due to personal and sensitive stories shared by children in chat conversations. Chat moderators get trained with special training material about particular rules, principles and basis of communication they should apply in their job and must accept these as compulsory to follow.

The Foundation should guarantee the following means of quality assurance to prevent possible offences in Yelon chat:

- Chat moderators go through a multi-stage selection and training process during which the selection Board of Trustees of the Foundation filter the applicants after each stage, if necessary. Parts of the selection and training process:
 - online application by filling in the questionnaire measuring attitudes made by the professional team of the Foundation dealing with chat moderation
 - face-to-face interview with at least two members of the professional team of the Foundation dealing with chat moderation
 - online exam from the e-learning material made by the professional team of the Foundation dealing with chat moderation
 - 3 day training made and conducted by professional team of the Foundation dealing with chat moderation during which applicants take part in activities providing/improving knowledge and skills necessary for chat moderating and sensitizing activities
 - 4×4 hour observation visits with experienced chat moderators of the Foundation
 - out of the applicants, those whom the professional team of the Foundation dealing with chat moderation deem fit for the position after the observation visits will become chat moderators.
- Chat moderators operate the chat only during its opening hours, in person, in the office of the Foundation, with the presence of a supervisor who monitors chat conversations and if needed, gives professional support.
- Duties are supervised by former moderators who can guarantee the safe functioning of the chat as a result of their professional knowledge and previous experiences in chat functioning. They are appointed by the management of the Foundation and Yelon.
- Chat moderators and supervisors regularly take part in professional case conferences and supervision during which they should provide full anonymity regarding children and guarantee that they do not share any specific information from chat conversations.
- Chat moderators and supervisors take part in a training organized by the Foundation three times a year and this training gives them support in their work concerning the chat service and develop them in their job.
- In order to reduce the risk factors deriving from the nature of the chat service of the Yelon program, every chat moderator signs a separate agreement when contracting, about the basic rules of chat work found among the annexes of the Policy (Annex 4.).

Safety, procedural protocol

Compared to the alert mechanism detailed in the Policy, it is a special rule that the colleagues of Yelon do not have to inform the team responsible for the compliance

with the Policy about cases emerging in chat conversations except for suspicions of abuse or threat connected to the Foundation (in the latter case, the child can also sign this on the link found at <https://yelon.hu/2020/04/02/chat/> webpage). Nevertheless, a case conference with the team responsible for the compliance with the Policy and the professional team of the Foundation can be initiated anytime, if necessary.

In addition to the above, to ensure the safe operation of the chat service supervisors should give constant feedback to moderators and evaluate their work. If somebody is thought not to speak properly with children or violates the Policy in any other way, supervisors sign this to the team responsible for the compliance with the Policy. In proportion with the severity of the case, malfunctioning can result in the termination of their contracts.

The Foundation should ensure to prepare the chat moderators and supervisors of Yelon during their training to recognize those cases in chat conversations that have to be signed and to inform children about possible actions. The team of Yelon operates in close cooperation with Pro Bono Child Rights Centre whose operation should be described to children by chat moderators in connection with cases of abuse emerging in chat conversations. The Pro Bono Child Rights Centre can help children if the child himself or herself dissolves his or her anonymity and directly contacts the Pro Bono Child Rights Centre.

Data protection

Yelon's chat interface is provided by LiveChat (an online platform for business purposes) on which chat can only be conducted by designated persons (chat moderators and supervisors), and only those responsible for the chat service can access closed chat chats. The Foundation ensures, through a contract with the chat attendants, that they can access the Yelon chat interface only in the Foundation's office on designated computers, which is always done in the presence of a supervisor. Closed conversations will be permanently deleted within 30 days - via the built-in automation agreed with the service provider, after which they will no longer be accessible to anyone. The Foundation guarantees that the platform providing the Yelon chat service (LiveChat) will only record data that is necessary for the operation of the system, therefore it can only be encrypted from the user's side (location, IP address) and cookies and pixels detailed in the privacy statement. The Foundation does not use these datas in any form, for any purpose, and does not store any additional personal information about the children who use the chat service.

The Foundation ensures that the colleagues of Yelon who have access to the chat conversations and other sensitive information can only work from computing devices which have trustable firewall and antivirus software installed.

12.3 Pro Bono Child Rights Centre

Principles, approach

The aim of the Pro Bono Child Rights Centre is to represent the best interest of a child in proceedings affecting them (whether it is about their right to contact, about child abuse or linked to the educational institution).

Accordingly, the principle of the Child Rights Centre is the approach of children's rights, whereby anyone resorting to the Foundation – the child, the legal representative or an institution – the Child Rights Centre will always operate in favor of the best interest of the child.

The Child Rights Centre operates as a team – consultations with the professionals surrounding the child involved in a given case is priority during the administration. Thus, as a general rule, no one-man decisions should be taken in the received cases.

Administration

- If the client is a child
 - no personal data will be stored about the child without the consent of the the legal representative, unless the child reports a crime and/or the Child Rights Centre acts according to the “confidentiality protocol”
- If the client is an adult
 - if the Child Rights Centre was resorted to and authorized by only one of the legal representatives of the child(s) concerned
 - the client acknowledges and undertakes to inform the other legal representative of the child about the authorization of the Child Rights Centre
 - the Child Rights Centre should inform the legal representative(s), that any kind of child abuse the Child Rights Centre becomes aware of, will be reported to the child protection services
 - if the Child Rights Centre was not resorted to and authorized by the legal representative(s) of the child(s) concerned
 - the Child Rights Centre will act according to the best interest of the child and will decide whether to inform the legal representative(s) or to initiate a case consultation within the child protection signal system as a first step

Safety, procedural protocol

As a special rule, as compared to the reporting mechanism set out in the Child Safeguarding Policy, staff members of the Child Rights Centre are not obliged to give

internal warning within the Foundation unless child abuse or endangerment is suspected in relation with the Foundation. Case consultation with the Policy Compliance Team and/or the professional team of the Foundation can be initiated whenever needed.

The Foundation makes sure that employees working for the Child Rights Centre and having access to the personal and other sensitive data of the child(s) concerned, can only work on devices with a reliable firewall and antivirus software installed.

Data protection

In addition to the data protection/GDPR rules set forth in the general section, the followings should be applied in order to increase the protection of children's personal data:

- Trello system
 - the Foundation will store all the exchanges of letters and descriptions between the Child Rights Centre and the client only in the Trello system, that is accessible only by designated employees of the Child Rights Centre
 - after the case is closed, its subsequent identification in the Trello system is only served by the file number assigned to the case
- Excel chart
 - besides the file numbers, email availability of the clients will be archived only in the Excel table stored on the server of the Foundation, that is accessible only by the designated employees of the Child Rights Centre

After a case is closed, every paper and online document and personal data shared with the Child Rights Centre will be deleted within 30 days of the date of termination of the mandate or the case at the Child Rights Centre.

12.4 Fundraising

The fundraising activity of the Foundation, in any form, including online invitations, production of merchandise and other marketing materials, are based on the principle that photographs or video recordings of children should not be used, nor the personal story of any child who is unaware of their own involvement in fundraising communications.

As a further principle, children and their legal representatives involved in such form of marketing communication should receive detailed information in advance about the campaign, its purpose, its implementation and how the donation will be used in the future.

Afterwards the informing procedure a written approval from the child and their parent is required, before the launch of such marketing campaign. The Foundation shall also guarantee that their approval may be withdrawn at any time.

The usage of any recording must always follow the general principles of communication of the Child Safeguarding Policy as the following:

- when publishing any recording, it must be ensured that it does not adversely affect or endanger the child or her/his/their family in any way
- special consideration is required concerning any form of publication of photos or videos which may contain a child shirtless or nude
- if a child and their legal representative appear in any recordings they should be given the opportunity to report their concerns to the Foundation at any time
- following the request of the persons affected, recordings should be removed in all cases,
- when sharing the story of a specific child in a campaign, special consideration must be taken to ensure anonymity and the identity of the child should remain unidentifiable

13. Modification of Child Safeguarding Policy in emergency situations

Emergency situations, such as the coronavirus pandemic that started in 2020, can fundamentally affect our lives - our weekdays, the working world, our relationships with family and friends, and the educational structure. Of course, these changes also affect the daily lives, surroundings, and physical and mental health of children.

As a child rights foundation we consider it our task to react to these situations. This is a two-fold reaction: firstly, it generally affects activities at the Foundation. Since we focus on questions, areas and problems which are prioritised in an emergency, we seek to offer services that provide real help for children, families and specialised professionals working with children even during these altered circumstances.

Secondly, changes affect the daily functioning of the Foundation. Amid the new circumstances it continues to be our responsibility to ensure the safety and protection of children that are getting in touch with us. Moreover, we ensure that effective action is taken into investigating, handling, and following up cases of suspicion of endangerment or abuse in accordance with the Policy guidelines. The Policy needs temporary modifications and supplementations in order to maintain its effectiveness ensuring child safety and protection in emergency situations.

The Foundation is acting in accordance with official guidance (by authorities, local governments and the government). As a rule, certain activities take place online, using platforms that are considered safe by the Foundation.

In emergency situations the Policy is modified as follows:

- The recruitment and selection of new employees takes place online.
- Training new employees: all necessary documents are to be sent electronically. Online training that was prepared by the Foundation on the contents of the Policy is to be completed.

Every employee must verify their understanding and acceptance of the contents of the documents by signing and posting this to the Foundation.

New employees continue to be obliged to take part in an internal child rights training. However these take place in person and therefore may be delayed beyond the prescribed six months. Informing children and their legal representatives: the Foundation continues to require the written informed consent of children and their legal representatives before starting any activity. In all cases, the information must be understandable for all individuals involved. It includes electronically sending written materials that detail the children's activities and a summary of the present Policy. The signed consent of the children and legal representatives needs to be sent by post to the Foundation.

Induction programs continue to form part of orientation for children joining the Foundation as volunteers. Their aim is to familiarise child volunteers with the program, the project, each other, employees of the Foundation, and to prepare them for working together. As a rule, these preparations are to be held online, in the form of video conference calls.

In relation to emergency situations, all changes concerning the activities of the Foundation that relate to children are to be communicated immediately online and in a written format to children and their legal representatives. The obligation to inform is the responsibility of the employees working on the respective program.

- Signalling: The reporting of harm or suspicion of harm in person is difficult. Notifications can still be made by downloading this template: <https://forms.gle/JBf7Xex3iXKNPvt79>
This template is only accessible by the Policy Compliance Team.
A notification can be made with the help of *Child Protection Reporting Form* (Annex 1) that is to be sent by mail to the Foundation.
The Policy Compliance Team may be unable to archive the report and its documents within the prescribed 24 hours. In such cases it is the team's responsibility to archive the documents as soon as possible.
- Case handling: As a rule, case handling activities take place online. For example:
 - Supervised sessions to help processing and conversation groups
 - Case discussions
 - Consultation with professional Foundation staff
- Personal meetings with children. Personal meetings (internal meetings as well as external programs) take place in accordance with current guiding principles (official, local, and governmental). As far as in person meetings are not precluded, these are only possible after prior agreement with the children and their legal representatives, and as long as it is deemed acceptable and comfortable for all individuals involved.
- Meeting children in an online space: Online conversations and meetings are to take place on a platform deemed safe, acceptable and user friendly for children by the Foundation. If necessary, employees of the Foundation can provide online courses for children on how to use these platforms.
During online conversations an effort must be made to avoid an employee being left alone with a child. If it is not possible to involve more adults in the conversation, the employee must be in a public place during the conversation.
During online conversations and meetings an effort must be made to create an environment where children feel comfortable and safe. For instance, making webcam use optional and hiding the background may make the surroundings more comfortable.

Annexes

Annex 1. – Child Protection Reporting Form

In case a child wants to make a report (s)he shall be given the opportunity to say what happened to him/her without being interrupted. The reporting form has to be filled out not in the presence of the child. The child's age, ability to foresee the consequences of his/her actions, sensibility, needs and rights shall be taken into

account when listening to the problem. If several children are concerned, please fill out the form for each child separately.

<p>Child's name: Date and place of birth: Contact details: Relative's contact details:</p> <p>Which of the Hintalovon Child Rights Foundation's program(s) are you involved in?</p>	<p>Date of the case:</p>
<p>Name, position and contact details of the reporter:</p>	
<p>Circumstances of the case (<i>What, when and where did (s)he notice; type of harm or behaviour; what did the child and witnesses say; Was there another adult involved, if yes, what did (s)he say?</i>)</p>	
<p>Steps undertaken (<i>what kind of steps were made to ensure the protection of the child; was there any other organisation involved and what kind of steps were undertaken</i>)</p>	
<p>Date:</p>	
<p>Reporter's signature:</p>	

Annex 2. – Code of conduct

It is the duty of every employee, volunteer and partner of the Hintalovon Child Rights Foundation to abide by and uphold the Child Safeguarding Policy. Before starting working at the Foundation every employee, volunteer and partner shall sign the present Code of conduct.

The foundation requests taking into account the child's best interests even in cases not foreseen under the present Code of conduct.

I the undersigned declare that:	
<p style="text-align: center;">General communication/behaviour</p> <ul style="list-style-type: none"> • I will always treat children equally regardless of their age, gender, language, religion, ethnicity or sexual orientation. • I will always consider children partners and listen to them. • I will always make sure that the child does not get into trouble. • I will always treat the child's and his/her family's personal data in confidentiality. • I will always communicate according to the child's age and maturity. • When communicating I will always be attentive to the child's limits and sensibility • I will always ensure that secrets I was entrusted with by a child or a group of children are treated confidentially and seriously. • I will always respect the limits of my relationship with children: I will not engage in a friendship or a sexual relationship with children and I will not share with them any personal issues. • I will show a good example. 	<p style="text-align: center;">Child protection procedure</p> <ul style="list-style-type: none"> • I will immediately report when detecting abuse or violation of law. • I consider every child to be equal and handle their cases without discrimination. • I declare zero tolerance on any form of violence or maltreatment against children. • I abide by the general rules applicable to the profession as well as the framework set out by the Foundation. • I particularly pay attention not to intensify the child's feeling of being victimised when the suspicion of abuse or violence arises in relation to him/her.
Conferences/Trainings	Child participation

<ul style="list-style-type: none"> • I intervene properly in case a conflict between children arises or children watch/share harmful content on their devices. • I take into account the needs of the group of children. 	<ul style="list-style-type: none"> • I help the child to participate in the Foundation's projects according to his/her age and maturity. • I encourage the child to share his/her opinion with the Foundation's colleagues and ask questions. • I inform the child about his/her rights under the specific project and the different complaint notification mechanisms. • I encourage the child to step up for himself/herself.
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<p>I the undersigned declare that I will never</p>
<p style="text-align: center;">General communication/behaviour</p> <ul style="list-style-type: none"> • I will not use violence against children. • I will not conduct a sexual relationship with anyone under the age of 18 who is associated with the Foundation. Being misinformed or mistaken about a child's age is no excuse. • I will not provoke or harass the child in any way. I will not humiliate or violate their rights. I will not undermine the child's self-confidence, I will not communicate in a scolding, condescending way. I will not use inappropriate language. • I will not force the child to work by any means. • I will not be under the influence of alcohol and/or drugs while working with the child.

- I will not introduce or engage in any political or religious opinion while working with children.
- I will not judge any children, their legal representatives, nor any subjects and questions asked by children who are in contact with the Foundation.
- I will not give or promise false or uncertain information to children associated with the Foundation.
- I will not accept gifts or favors from children and their families who are in contact with the Foundation.
- I will not engage in unnecessary confrontation with colleagues or others in front of the children.
- I will not take any pictures, video or audio recordings for my own purposes.
- I will not share, show or recommend harmful (pornographic, aggressive) content to children.
- I will not publish any pictures with a child shirtless, nude or improperly dressed.
- I will not publish any unauthorized images, videos or audio recordings.

Conferences/Trainings

- I will not allow children to take pictures of each other during sessions or trainings without the consent of their peers.
- I will not send a child out of a program/training without ensuring her/his own safety.

Child participation

- I will not take the child anywhere without the consent of their legal representatives, unless it is absolutely necessary for the safety of the child.

I, the undersigned, hereby accept the Code of conduct and take notice of the fact that the current policy is limited to the most important or high-risk events and is not intended to be a full-scope list of recommended behaviour.

I accept that I will not engage in any behaviour not listed above but I do consider to be dangerous or may put the well-being or safety of the child into risk.

Furthermore, I accept that whenever I am unsure whether a particular situation or behavior is dangerous or unsafe for a child, I will always seek the program leader's advice within the Foundation or the policy compliance team.

I, the undersigned, understand and accept the Code of conduct of the Foundation. I declare under penalty of perjury that I have not been prosecuted for child abuse or sexual harassment and have never been investigated in such matters. Furthermore, I declare that I am not prohibited from public affairs and I am not prohibited from any profession, trade or activity and I have no criminal records. All the information I have provided to Foundation are true and correct.

Dated in Budapest on the

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Signature

Annex 3. – Guidance for occasional volunteers and visitors

Hintalovon Child Rights Foundation was established in 2015. The Foundation's core mission is to implement projects that contribute to the enforcement of children's rights and support their well-being. Children have the right to protection and our obligation is to help the enforcement of this right.

Protecting children is the duty of the Foundation's every colleague, volunteer, supporter, participant, advisor and visitor.

According to Article 19 of the UN Convention on the Rights of the Child, State Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse. The Foundation's Child Safeguarding Policy is based on this principle, and therefore every volunteer and visitor shall accept them.

We would like our volunteers and occasional visitors to get access to our projects and help our work, obeying the following rules.

Ethical norms on production and exploitation of pictures, audio and video recordings:

- Production of pictures, audio and video recordings exclusively in relation to the Foundation's projects.
- One shall always ask for permission before taking a picture or an audio or video recording!
- Please ensure that you do not jeopardise the child, his/her family or environment by disseminating the picture!
- Communicate (to the child) that you are producing the picture, video or audio recording as the employee of the Hintalovon Child Rights Foundation!
- Do not release pictures of naked or not properly dressed children. These pictures shall never in any case be used!
- Respect of the child's dignity is of utmost importance and shall be taken into account when using a picture, an audio or video recording.
- Only officially endorsed pictures and video recordings can be shared on social media platforms.
- The child's personal data (full name, address, or any other information likely to identify the child) shall not be indicated on the picture, audio or video recording.

The volunteer shall refrain from any conduct that harms the Foundation's objectives and legitimate interests.

I, the undersigned, declare that:

- I will never act inappropriately, or in a way that prejudices the child's interests.
- I will never act in an offensive or sexually provocative way towards the child. (ex. hug, kiss)
- I declare zero tolerance on any form of violence or maltreatment against children.

- I do not discriminate against the child.
- I do not trespass professional limits.
- I do not take the child anywhere without the legal representative's consent, unless this is strictly necessary for the protection of the child.
- I will not be under alcohol and/or drug influence while working with children. I do not handle the child as a victim.
- I will not hide any unlawful fact that I became aware of.

I, the undersigned have understood and accepted the Hintalovon Child Rights Foundation's present Policy. Being fully aware of my criminal liability, I hereby declare that I was not charged with child abuse or sexual harassment and no examination was conducted against me in such cases. I do hereby declare that I am under no prohibition by final judgement to exercise professional activity and I was never convicted by a final judgement for committing a crime. I declare that the information provided to Hintalovon Child Rights Foundation is truthful.

Budapest, 20.....month.....day

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signature

Annex 4. – Agreement on the statutes of the chat work for Yelon chat-operators

1. The chat-operator accepts and expresses the consent of the Hintalovon Child Rights Foundation's Child Safeguarding Policy and of the Code of conduct. Even in cases not specified in these regulations, the Foundation expects the procedure to be fit the best interests of the children.
2. The child has the right to ask anything.
 - The chat-operator does their best to have a broad knowledge of the service's topic and has to be able to communicate them in a comprehensible manner and in a way fitting the child's level of development.
 - If the child asks something or asks for help beyond the service's competences, we redirect them if possible.
 - If the chat-operator, despite their careful preparation and background information, is unable to respond to something, they will tell the child.
 - The behavior of the child shall under no circumstances authorize the chat-operator to be disrespectful, patronizing, lecturing or offensive to a child.
3. The chat-operator cannot discriminate or judge in any way.
 - The operator represents the spirit of the Foundation, according to which all people are equal.
 - The child has the right to receive appropriate information and assistance in matters affecting their life.
 - Any questions or requests from the child deserve equal attention. The operator should do everything in their best to understand the child's questions well and answer it in a way fitting the child's level of development.
 - The operator's own opinion is irrelevant regarding the child's question or request, and the operator should not influence the child's decision.
4. When an adult talks to a child about sex, the most important thing to keep in mind is the child's maturity level. It is only worth saying the things the child can understand and comprehend emotionally. Saying too much will overload them which raises even more questions, and saying too little will cause disappointment which makes them look for information elsewhere. There is no guarantee that the information the child finds there will not be overwhelming and that their natural curiosity will not be abused. Nowadays, they will search the internet first, where a surplus of information is certain.
5. The primary function of the service is the provision of information. However, it may be necessary for the child to inform the operator of their situation or circumstances in order to select the appropriate information or assistance.

- The operator assists the child in choosing the answer or solution appropriate to their own circumstances, habits and capabilities. The operator cannot make decisions for the child.
 - The operator carefully monitors what the child has to say or question and identifies the child's true needs with appropriate questioning techniques.
 - The operator explains the options and does not give direct advice.
6. The chat-operator respects the child's anonymity.
 - If personal information is accidentally discovered about the child, the operator will inform the chat service manager,
 - and personal information will be destroyed.
 - Under no circumstances should the operator initiate or establish personal contact with children using the chat.
 - Any abuse of a child's personal information will result in the immediate termination of the operator's contract and they may be sued by the Foundation according to the severity of the case.
 7. The operator undertakes to treat all chat conversations confidentially. They may only discuss the content of the conversations with Foundation professionals, operators, and supervisors.
 8. The chat-operator will make every effort to keep themselves informed about the topic covered by the service.
 - They keep track of website changes and Foundation news.
 - They participate in regular group supervision.
 - They participate in individual supervision if needed.
 - They participate in regular in-service training.
 9. The chat-operators shall carry out their work strictly in accordance with the on-call time and the rules of the chat service, and uses the LiveChat interface as follows:
 - they can access the Yelon chat interface only in the Foundation's office on designated computers, which is always done in the presence of a supervisor
 - they use only those functions of the interface that are necessary for chatting with children (recording chat, chatting, tagging, closing, and customizing your own notifications).
 10. If the chat-operator determines that an intervention is necessary for the child's best interest, they shall inform the chat service manager. The ability to intervene is limited due to the anonymity of the child, but in an emergency situation, the operator, in collaboration with the chat service manager, will make every effort to assist the child.

I, the undersigned, declare that I have understood and accepted the statutes of the chat work.

Budapest, 20..... month day

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signature