

CHILD PROTECTION POLICY

Association for Civil Society Development SMART

1. Introduction and Legal Framework

The Association for Civil Society Development SMART (hereafter: SMART) is committed to safeguarding the rights and well-being of children in accordance with:

- **Convention on the Rights of the Child (UN)**
- **Croatian Family Act (Obiteljski zakon)**
- **Act on the Protection of Children from Violence (Zakon o zaštiti od nasilja u obitelji)**
- **Criminal Code of the Republic of Croatia (Kazneni zakon)**
- **Act on Personal Data Protection (GDPR implementation law)**
- **Act on Volunteering (Zakon o volonterstvu)**

SMART adopts a zero-tolerance approach to all forms of child abuse, neglect, and exploitation. This policy is binding for all employees, associates, volunteers, trainees, and external partners.

2. Scope and Definitions

A *child* is defined as any person under the age of 18.

Child abuse includes (but is not limited to):

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Exploitation (including online abuse)

3. Guiding Principles

- The best interests of the child are paramount
- All children have equal rights to protection
- Safeguarding is everyone's responsibility
- Concerns must be acted upon promptly and appropriately

- Confidentiality must be respected while ensuring protection

4. The Four Areas of Child Safeguarding

4.1 Policy and Procedures

SMART ensures:

- This Child Protection Policy is publicly available (e.g., website, office access)
- Clear procedures exist for preventing and responding to harm
- Risk assessments are conducted for all activities involving children
- Safeguarding is integrated into project design and implementation

Operational safety and risk management

All activities involving children are planned and implemented in a safe, inclusive, and controlled environment. For this purpose:

- A structured risk assessment is conducted prior to each activity, identifying potential physical, emotional, and environmental risks and defining mitigation measures
- Activities are designed taking into account the age, gender, and specific needs of participants, including children with disabilities or other vulnerabilities
- Clear roles and responsibilities for safeguarding are defined for each activity

During implementation, SMART ensures:

- Children are never left unattended in organisational settings
- Where possible, at least two responsible adults are present during activities involving direct contact with children
- Adequate supervision is ensured at all times, with a recommended ratio of one trained adult per 10 participants, adjusted depending on the context
- Safe, accessible, and appropriate venues are used

Special attention is given to the prevention of peer violence, discrimination, exclusion, and any form of harmful behaviour within group settings.

Code of Conduct

All representatives of SMART must:

- Treat children with respect and dignity
- Never engage in any form of abusive or exploitative behavior
- Avoid being alone with a child in private spaces
- Use appropriate language and behavior at all times
- Obtain consent before taking photos or videos
- Ensure online interactions are safe and appropriate

Prohibited behavior includes:

- Any sexual activity with a child
- Physical punishment or degrading treatment
- Grooming or inappropriate relationships
- Sharing inappropriate content

All staff must sign and adhere to the Code of Conduct.

4.2 Safe Recruitment

SMART is committed to recruiting suitable personnel to work with children.

Recruitment Procedures

- Clear job descriptions include safeguarding responsibilities
- Interviews include safeguarding-related questions
- At least two references are required
- Identity verification is mandatory

Background Checks

- All record checks are required where legally possible
- Additional vetting is conducted for roles involving direct contact with children
- Volunteers and trainees are subject to the same safeguarding standards

No individual will be engaged if they pose a risk to children.

4.3 Responding to Concerns (Reporting Mechanisms)

SMART ensures that all concerns are taken seriously and addressed promptly.

Reporting Procedures

- Any staff member who suspects abuse must report immediately
- Reports can be made to:
 - Designated Safeguarding Officer (DSO)
 - Senior management
- Reports can be made confidentially

Designated Safeguarding Officer (DSO)

SMART appoints a trained DSO responsible for:

- Receiving and managing safeguarding concerns
- Ensuring appropriate action is taken
- Liaising with authorities when required

Response Actions

- The safety and well-being of the child are prioritised at all times
- Staff must not investigate allegations independently
- All concerns are documented securely and confidentially
- Relevant authorities are informed when necessary
- Support is provided to affected children

Whistleblowing

- Staff can report concerns without fear of retaliation
- Anonymous reporting options are available

4.4 Training and Capacity Building

SMART ensures continuous learning and awareness on safeguarding.

Training Requirements

- All staff, volunteers, and trainees receive mandatory safeguarding training
- Induction includes child protection awareness
- Refresher training is conducted regularly

Specialized Training

- Additional training for staff working directly with children
- Designated Safeguarding Officer receives advanced training
- Training includes practical scenarios, recognising signs of abuse, and managing group dynamics

Monitoring and Review

- Policy is reviewed annually or after any incident
- Feedback is incorporated to improve safeguarding practices

4.5 Safe Communication, Media and Data Protection

SMART ensures that all communication involving children is conducted in a safe and respectful manner.

- Prior informed consent is obtained from parents or legal guardians, and where appropriate from children, before collecting personal data, taking photographs, or recording videos
- Children and guardians are informed about how data and materials will be used
- The use of images and recordings is limited to legitimate organisational and project purposes
- Any interaction with external media or third parties is supervised and conducted in accordance with safeguarding standards
- Online communication with children is conducted only through appropriate and transparent channels

SMART applies data protection principles in line with applicable legislation and ensures that all personal data is stored securely and accessed only on a need-to-know basis.

5. Implementation and Accountability

- Management is responsible for enforcing this policy
- All staff are accountable for compliance
- Breaches of this policy may result in disciplinary action, including termination and legal reporting

SMART ensures that safeguarding responsibilities are embedded in all stages of project implementation, including planning, delivery, monitoring, and evaluation.

- Safeguarding considerations are integrated into partnerships and cooperation with external stakeholders
- All partners are expected to adhere to equivalent safeguarding standards
- Compliance with this policy may be subject to internal monitoring

6. Confidentiality and Data Protection

- All safeguarding information is handled confidentially
- Data is stored securely and shared only on a need-to-know basis

7. Approval and Review

Approved by: The Assembly of the Association for Civil Society Development SMART

Date: 1 April 2026

Next Review Date: 1 April 2027

8. Publication

This policy is publicly available via:

- SMART's official website
- Office premises upon request
- Partner and donor communications

Igor Bajok, executive director

