
Centre for Education Policy Child Safeguarding Policy

Updated February, 2025

Policy Statement

Centre for Education Policy (CEP) is an independent research organization with a mission to improve the education system in Serbia and the region of Western Balkans through research, policy analysis, disseminating information and building human resources in education. CEP's goal is to provide education policy with evidence-based approach, to improve education system in Serbia, to inform education policy with research results, to test and pilot potential solutions and provide recommendations to decision makers, to build stakeholders capacities for improvement of education system in Serbia, to establish long term cooperation with national partners and partners from abroad, ensuring exchange of experiences and quality import.

Consequently, CEP's mission and goal include strengthening different stakeholders in education for assisting children and their communities aiming towards holistic child development. CEP commits to an active approach towards the issues and challenges of children and youth in Serbia, especially in education, and significantly contributes to their resolution, as a relevant actor within the general pool of organizations and institutions dealing with education issues. Therefore, CEP contributes to improvement of the position of the child in society in accordance with the principles and rights defined by the Convention on the Rights of the Child.

Within the framework of child rights, the interventions of CEP contribute to fulfillment of the children's right to survival, development, protection and participation, respect for the views of the child, education, with the principals of the best interest of the child and non-discrimination. As stated in UN Convention on the Rights of the Child, CEP defines a child as a person who has not attained the age of 18 years old.

As a credible child safe organization, CEP employs 12 full time staff who have a common commitment to child protection and CEP's Child protection policy stipulates prevention and response of abuse, neglect, exploitation and all other forms of violence under any circumstances including emergency setting. Employment contracts state obligatory obeying of all CEP acts, which include Child Protection Policy that must be adhered to and where appropriate signed by all staff, volunteers/interns, board members, partners, contractors and sub-contractors.

CEP Child protection policy including the following standards seeks to protect and reduce the risk to the children in all CEP programs and offices.

1. Screening and Recruitment

1.1 In the best interests of children, CEP will not hire anyone with a prior conviction for child abuse, pedophilia or child related offences.

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- 1.2 Advertisement and job description for identified posts will include a reference to the commitment to CEP child protection policy and request a police background check for application.
 - 1.3 Basic screening of applicants for employment includes a written application, personal **interviews** and reference checks. During the interview process, applicants will be asked to describe their previous experience of working with children and whether any child protection incident has occurred to the person before. The same requirement is applied for recruitment of steering committee members, members of board of directors, interns and volunteers.
 - 1.4 Job offers made in relation to identified posts for employee, steering committee members, members of board of directors and intern will be subjected to the satisfactory clearance from police background check and referee.
 - 1.5 A **parallel practice** will operate in regard to volunteers. Any volunteer who is recruited or designated for work with children and community will be asked to complete a disclosure form, and to provide a referee letter mentioning the person has no known conviction for child abuse, neglect, exploitation and other violence and has been recommended as suitable to work with the children.
 - 1.6 All employees, steering committee members, members of board of directors and interns are informed of and acknowledge in written CEP Child Protection Policy at the start of any recruiting process.
 - 1.7 Individuals who are hired as independent contractors are also notified of CEP Child Protection Policy and are made aware that they are expected to sign acknowledgement of child protection behavior protocols set out below in section 4.

2. Sub-Implementing Partner

- 2.1 All CEP's partners will sign and abide by CEP Child Protection Policy or their own organization's Child Protection Policy.
- 2.2 If CEP, during organization review, notes the gaps in Child Protection Policy of sub-implementing partner, CEP will facilitate and support the partner for policy review and improvement.

3. Education and Training

- 3.1 CEP equips all employees, steering committee members, members of board of directors, interns, volunteers, independent contractors, donors, visitors, partners and others affiliated with CEP to understand and perform their child protection responsibilities and obligations.
- 3.2 All employees, steering committee members, members of board of directors, interns and volunteers will receive **one day training on child protection and CEP child protection policy within 3 months of recruitment. Refresher training will also be provided every year.**
- 3.3 CEP will also raise awareness of communities including children and their families on child protection through user friendly communication materials, community talks and awareness sessions.

4. Behavior Protocol

4.1 All person affiliated with CEP (employee, steering committee members, members of board of directors, staff, interns, volunteers, independent contractors, donors, visitors, and partners) abide by and acknowledge in writing the receipt and understanding of Child Protection Behavior Protocols. Signed agreements should be kept on file by the relevant office. Rules of behavior to protect children are based on local and culturally appropriate interactions with children.

Acceptable Behavior: CEP will

- Treat every child with respect and dignity and without discrimination against race, religion, culture or sex.
- Dress in a culturally appropriate way when dealing with the children.
- Build mutual trust and understanding with the children.
- Recognize and respect the children's right to privacy
- Assess the child protection risks for all events in which the children are involved and plan for how to mitigate these risks. Children's safety and risk of violence will be assessed in advance. In general, situations in which a child is alone with an adult will be avoided. However, persons that will be in charge of working with children without supervision of other adults will be persons of trust whose background will be checked. In cases where persons are engaged in work with children long-term, in the beginning they will be supervised by experienced colleagues who are familiar to children. Additionally, establishment of ground rules of conduct, special instructions on conduct, and different ways of disseminating information (workshops, leaflets...) about acceptable and unacceptable forms of behavior will be ensured, as well as educating adults on how to recognize symptoms of abuse and neglect. In cases of out-of-school activities presence of one or more adults who children are familiar with will be also ensured, depending on the number of children involved in the activity.
- Listen to what the children have to say and reveal and take appropriate and immediate actions as required.
- Maintain professional boundaries in dealing with under 18 supporters or beneficiaries.
- Adhere to expected behavior regarding communication, social media and digital technology as stated under section 5.

Unacceptable Behavior: CEP will not

- Behave in an inappropriate physical manner (e.g. touching, viewing or holding the children's private parts), or develop a sexual relationship with a child (under 18 years old), regardless of the specific legal age of consent of the country
- Fondle, hold, kiss, hug or touch children in an inappropriate or culturally insensitive way.
- Use language, make suggestions or offer advice which is inappropriate or abusive, including language that causes shame or humiliation, or **belittling or degrading human dignity**.
- Hit or use other corporal punishment against a child while the child is in CEP's care or CEP person is conducting CEP work
- Do things of a personal nature (such as bathing or toileting) for a child that they can do for themselves.

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- Show favor to particular children.
 - Be intoxicated under the influence of alcohol or drugs whilst children are in their care.
 - Spend time alone with a child, away from others or behind closed doors or in a secluded area
 - Condone or participate in behavior with children which is illegal, unsafe or abusive; including harmful traditional practices, spiritual or ritualistic abuse
 - Hire children for any form of child labor including as domestic helper (Child labor is work that is mentally, physically, socially or morally dangerous and harmful to children, or that interferes with their schooling. See ILO Convention 182 and 138 for further explanation of child labor)
 - Exchange money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior. This includes any exchange of assistance that is due to beneficiaries of assistance.
 - Use the organization's computers or other equipment to view, download, create or distribute inappropriate material, including but not limited to pornography.

4.2 All contact with children (**whether by phone, text, email or direct contact**) should be supervised, accompanied, or at least in sight of other adult. CEP recognizes that situations may arise where this cannot be applied for urgent matter or for practical reasons. In such situation, the line manager should be informed upfront or as soon as possible.

4.3 If any CEP person develops a concern or suspicion regarding child maltreatment or child protection incident of any kind, especially but not only by a fellow worker, whether in the same agency or not, they *must* report such concerns immediately (see section 7 on reporting and responding).

5. Communicating, Social Media, and Digital Technology

5.1 In all forms of communication, children are treated and portrayed with dignity and not as helpless victims. Special consideration will be given to photographs depicting children with disabilities, refugees, and those in situations of conflict and disasters to accurately portray context and maintain dignity.

5.2 When photographs or videos of children are taken, we will explain to the subject the use of the images or video material.

5.3 Children should be adequately clothed and poses that could be interpreted as sexually suggestive should be avoided.

5.4 Informed written consent from the children and parents/ guardian will be obtained to take photograph of the child and the use of these photographs and the story of the child for publication. Consent form for parents/ guardians / children is provided by CEP or consent form used by the school. However, it is not necessary to gain specific individual consent for those in the crowd shots.

5.5 Material posted on social media or digital technology does not contain a child's name, or child's personal location/address.

5.6 CEP authorized staff is the only authorized to post and share material on the CEP social media sites (Facebook, Instagram). Before posting on the CEP social media platforms, designated staff must adhere to this policy and gain approval from the management to post content.

5.7 CEP discourages direct, un-facilitated, undocumented **communication** through social media without CEP's knowledge between a CEP person and the children.

6. Safe Child Participation

6.1 CEP works to empower children as citizens and participants in their own well-being, and to minimize any risk of harm or negative consequence resulting from participation in activities promoted by CEP.

6.2 Child participation activities are voluntary and inclusive (especially of the **most vulnerable** children), and both children and parents/guardians make informed decisions regarding participation, including due consideration of risks that could be associated with the activity. This applies to involvement of young people under 18 in CEP work as volunteer, either assisting in administration or involving in the events or activities.

6.3 CEP sometimes helps children to travel to events, activities that required travel. In such cases the parents or caregivers, or other legally required entity or individual, give informed consent prior to the travel. The child's health, safety and well-being are the most important priorities during travel supported by CEP.

7. Reporting and Response of Child Protection Incidents

7.1 If any CEP person develops a concern or suspicion regarding child maltreatment or child protection incident of any kind, especially but not only by a fellow worker, whether in the same agency or not, they *must* report such concerns immediately to CEP's contact person for child protection Ivana Cenerić, Researcher.

7.2 Response for child protection incidents will include the following:

7.2.1 Complaints and concerns will always be investigated and acted upon swiftly.

7.2.2 Where children are concerned, their welfare will be the paramount consideration.

7.2.3 Disclosures from children will be treated with sensitivity and without pressing for information. The worker will reassure the child or young person that they have done the right thing by coming forward and let them know they need to tell someone else. **They should not be asked to promise total confidentiality.**

7.2.4 Disclosures or concerns reported by adults should also be received on the basis that information may be shared with relevant authorities. No staff member or volunteer will **prejudice** their own standing at work by responsibly reporting potential or suspected child abuse. If reporter requested to be anonymous CEP will respect his/her choice and only when intentional false accusation is found after investigation, CEP will further manage the issues as staff management issue.

7.2.5 The receiver of the complaint should make an assessment of the indicators of physical, sexual, and emotional abuse, and neglect (see annex 3) for the immediate future and do whatever they can to mitigate these risks. They must carefully record the complaint and pass the record, without delay, to contact person (Ivana Cenerić).

7.2.6 If alleged perpetrator is the person who has no affiliation with CEP, CEP will still record the incident and provide necessary psychosocial support to the survivor and the family.

7.2.7 If alleged perpetrator is the person who has affiliation with CEP, National Director will convene a Child Protection Meeting. This must be held within 24 hours. If urgent action is required to protect children or others, then this should be done immediately.

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- 7.2.8 The Child Protection Meeting will include Director, Program Coordinator and other employees unless otherwise there are other reasons not to include these persons. The meeting will be to assess the concern and decide next steps, including who else needs to be kept informed. Parents or guardians of children involved will also be informed if appropriate. Apart from this, careful confidentiality will be observed.
- 7.2.9 The meeting may instigate an investigation if it is thought there may have been a breach of organizational policy or standards. The Child Protection Meeting, will designate an investigating officer and an investigation team and will continue to guide and monitor the process.
- 7.2.10 All steps are also presented in flowchart that is made available to all staff and contracted persons for easier following of the procedure.

7.3 CEP will carry out the following process to ensure confidentiality.

- 7.3.1 Children's safety is paramount and therefore their confidentiality must be protected at all stages. Identified information about child protection incident will be shared on a 'need to know' basis only.
- 7.3.2 The subject of the complaint (alleged perpetrator) and all witnesses must cooperate fully and openly with internal and statutory investigations and hearings. Their confidentiality will be protected and information which could identify them will be shared on a 'need to know' basis only. But CEP preserve the right to inform the child protection incident to other recruiting agencies for the best interest of the child.

7.4 The responsibilities of the investigation team will involve the following.

- 7.4.1 The investigation team will gather evidence and interview relevant parties in order to establish the probable facts where the criminal/statutory investigation has been non-existent or inadequate.
- 7.4.2 The investigation team will also make recommendations on improving the policies and practices that may have enabled the breach of child protection obligations, as well as on how to rebuild community trust and on what help should be provided to minimize the harm to survivors of child protection incident
- 7.5** If a member of staff is the subject of an allegation, that staff member will be asked to take leave from their duties on full pay until an investigation has been completed. If a volunteer is the subject of an allegation, that volunteer will be asked to withdraw from their work until an investigation has been completed. In both cases, it should be made clear that suspension does not imply guilt but rather protects all parties whilst an investigation is undertaken.
- 7.6** CEP will provide psychological support and other emergency support to both the alleged survivor and the alleged abuser as far as possible whilst an investigation is carried out.
- 7.7** If employee, members of board of directors or intern is found to have committed child protection incident, CEP will take disciplinary action and/or any other action which may be appropriate to the circumstances. If volunteers are found to have committed such acts, the volunteering relationship will be ended.

8. Risk assessment and mitigation

- 8.1** CEP will annually assess risk to children from all organisational functions and develop strategies to minimise those risks. A risk assessment of all [organisation] operations, programmes and project activities will be conducted. Risk mitigation strategies will be developed, which minimise the risk to children, and incorporated into the design,

delivery and evaluation of programmes, operations and activities which involve or impact upon children. Risk assessment will be done based on PCF methodology and it is part of CSGP documents.

How we will ensure our commitments are met

A child protection contact person, Ivana Cenerić, Researcher, will be designated to oversee CEP's obligation described in this child protection policy.

Contact person should

- Be well acquainted with the Child Protection Policy, Rulebook on the protocol for action in an institution to respond to violence, abuse and neglect, General and Special Protocol for the protection of children and students from violence, abuse and neglect, related to preventive activities and defining procedures in the protection of children from violence, Rulebook on further criteria for recognizing forms of discrimination by staff, children, students or third persons in an educational institution, Rulebook on the actions of institutions in case of suspicion of or identified discriminatory behavior,
- Follow the procedure in cases when child safety is endangered,
- To inform director of the organization and the Country Representative of Pestalozzi Children Foundation,
- To inform relevant institutions (health, police, social welfare center) if situation requires,
- To inform child's parents or guardians,
- To cooperate with school and relevant institutions in taking actions and implementing measures,
- To monitor implementation of measures,
- To collect data and report.

Contact person informs director of the organization who then informs Country Representative of Pestalozzi Children Foundation (Slavica Kijevčanin), who forwards information to the representative of Pestalozzi Children Foundation in Switzerland in charge of child protection.

A dissemination action plan will be developed to distribute and receive sign acknowledgement of employees, steering committee members, interns and volunteers. Every workplace will display contact details for reporting and response of child protection incidents.

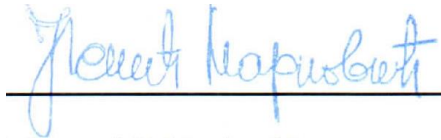
CEP will ensure that this policy is revised every three years which will be approved by the CEP's Governing Board.

Declaration of commitment

I have signed CEP Child Protection Policy with the acknowledgement that;

- 1) I have read and understood the detail content of child protection policy (including annexes).
- 2) I will work within the procedure of child protection policy as set up in the organization.
- 3) I have not been accused or convicted of any offence regarding child protection involving physical or sexual abuse of the children.
- 4) I admit to accept any discipline by Center for Education Policy for breach of any agreement involved in this policy.

Signature



Name Jasminka Čekić Marković

Director

Belgrade, Serbia

Date 10.02.2025.

Annex 1 (Working Definition)

Child Protection: the prevention of and response to abuse, neglect, exploitation and violence against children.¹

Child safeguarding (CSG): is the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children, that is that they do not expose children to the risk of harm and abuse, and that any concerns the organisation has about children's safety within the communities in which they work, are reported to the appropriate authorities.

Abuse: Any intentional act to harm a child within relationships of responsibility, trust or power.²

Physical abuse: Physical abuse of a child is defined as the intentional use of physical force against a child that results in – or has a high likelihood of resulting in – harm for the child's health, survival, development or dignity. This includes hitting, beating, kicking, shaking, biting, strangling, scalding, burning, poisoning and suffocating. Much physical violence against children in the home is inflicted with the object of punishing.³

Sexual abuse: Sexual abuse is defined as the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared, or else that violates the laws or social taboos of society. Children can be sexually abused by both adults and other children who are – by virtue of their age or stage of development – in a position of responsibility, trust or power over the victim.⁴

Emotional and psychological abuse: Emotional and psychological abuse involves both isolated incidents, as well as a pattern of failure over time on the part of a parent or caregiver to provide a developmentally appropriate and supportive environment. Acts in this category may have a high probability of damaging the child's physical or mental health, or its physical, mental, spiritual, moral or social development. Abuse of this type includes: the restriction of movement; patterns of belittling, blaming, threatening, frightening, discriminating against or ridiculing; and other non-physical forms of rejection or hostile treatment.⁵

Neglect: The deprivation of a child's basic needs when an adult caregiver has the means to provide for those needs. Basic needs include health, education, emotional and spiritual development, nutrition, clothing, medical and dental care, supervision, shelter and safe living conditions.⁶

Exploitation: The use of a child for the benefit of others. This includes, but is not limited to, child labor and sexual exploitation. Sexual exploitation targets children through an abuse of power or trust for sexual purposes; examples include child prostitution, child pornography and the trafficking of children for sexual abuse.⁷

¹Minimum Standards for Child Protection in Humanitarian Action, The Child Protection Working Group (CPWG)

²World Vision International guidance note: Child protection in World Vision

³ Preventing child maltreatment: a guide to taking action and generating evidence, World Health Organization and International Society for Prevention of Child Abuse and Neglect

⁴ Preventing child maltreatment: a guide to taking action and generating evidence, World Health Organization and International Society for Prevention of Child Abuse and Neglect

⁵ Preventing child maltreatment: a guide to taking action and generating evidence, World Health Organization and International Society for Prevention of Child Abuse and Neglect

⁶World Vision International guidance note: Child protection in World Vision

⁷World Vision International guidance note: Child protection in World Vision

Commercial exploitation: exploiting a child in work or other activities for the benefit of others and to the detriment of the child’s physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour.

Violence: The use or threat of physical force or power that harms a child. Although abuse, neglect and exploitation are forms of violence, we include “violence” as a separate category in order to address additional threats from which children need to be protected, including gang violence, bullying, harassment and playground violence.⁸

Annex 2 Reporting Form

CONFIDENTIAL
Number of Case:
Referral Details: Date: Time: Venue:
Reporter’s Details: (if provided) Name: Address/Area: Contact phone: Occupation: Relationship to Children:
Child’s Details: ID: Age: Date of Birth: Gender:

⁸World Vision International guidance note: Child protection in World Vision

Area:

Education Level:

Current Education Status:

Occupation:

Others (any):

Alleged perpetrator' s Details:

Age:

Date of Birth/Age:

Gender:

Area:

Education Level:

Current Education Status/ Occupation:

Current situation of Child:

Presenting problems:

Safety:

Physical health:

Psychological:

Social:

Other:

Detail Description of the Case:

Is alleged perpetrator CEP person? Yes, ----- No, -----
Action taken to date: Presenting problems: Safety: Physical health: Psychological: Social: Other:
Fill-up by Date
Received by Date:

Annex 3 Assessment of the indicators of physical, sexual, and emotional abuse, and neglect

CEP staff and/or associates will, upon complaint where relevant, assess for physical and behavioral indicators of physical, sexual, and emotional abuse, and neglect.

Following indicators do not necessarily prove that a child has been harmed, however they serve to alert us that harm may have occurred and that a child may require help or protection.

	Physical indicators	Behavioral indicators
Physical abuse	Unexplained bruises, cuts, abrasions, burns, fractures or dislocations	Inconsistent or lack of explanations of how injuries occurred. Child is wary of a particular individual. Child cringes when touched unexpectedly, hides injuries etc. Aggressive, violent or withdrawn behavior, indiscriminate affection seeking, general sadness. Child runs away from home, is afraid of going home, or tries extremely hard to take care of parents/caregivers. Child describes abusive situations or while playing imitates negative behavior or language.
Sexual abuse	Itching or pain in the genital or anal area. Injuries in genital or anal area or pain experienced in urination or elimination. Stained, torn, bloody underclothing.	Age-inappropriate sexual play, drawing, knowledge etc. Child runs away from home, is afraid of going home. Child states abusing or describes activities which are abusive. Fear of certain people or

	Physical indicators	Behavioral indicators
	Blood in urine and stool. Sexually transmitted disease. Pregnancy.	person or places. Regression to an earlier stage of development. Recurring physical complaints without physiological basis. Child suffers from depression or withdrawal, self-destructive behavior, acting out, promiscuity, eating disorders, compulsive behaviors, pervasive interest in sex. Child tries to make him/herself as unattractive as possible. Sexualized behavior with younger children.
Emotional abuse	Bed-wetting or soiling that has no medical cause, frequent psychosomatic complaints, non-organic failure to thrive, has not attained developmental milestones within the appropriate age range, malnutrition. Skin suffers from dehydration, prolonged vomiting or diarrhea. Dressed differently from other children in the family, deprived physical living condition compared to other children in the family.	Speech, motor, sensory developmental lags without an obvious physical cause. Severe symptoms of depression, anxiety, withdrawal or aggression, self-destructive behavior, overly compliant, too well-mannered, too neat and clean, extreme attention seeking behavior, extreme inhibition in play, when at play behavior may model or copy negative behaviors and language used at home. Recurring physical complaints without medical cause, tuns away from home, nightmares, poor sleeping patterns. Antisocial behavior, lack of self-esteem, obsessive behaviors,

	Physical indicators	Behavioral indicators
		developing psychotic symptoms. Indicates they have witnessed family or domestic violence.
Neglect	Dressed inappropriately. Extremely dirty or unbathed. Left unattended frequently or inadequately supervised. Inadequate or lack of medical and dental care, malnourishment, lacks adequate shelter.	Severe developmental lags without an obvious physical cause. Lack of attachment to parents, indiscriminate attachment to other adults, demanding of affection and attention. Poor school performance, school attendance. Frequent unsupervised absences from home or lack of supervision at home. Engages in delinquent acts, has poor social skills, has no understanding of basic hygiene. States that parents are absent, or basic needs are not being met.

Annexes in Serbian (separate documents)

- Annex 4 Code of conduct (in Serbian)
- Annex 5 Declaration of commitment (in Serbian, for CEP employees and associated)
- Annex 6 Code of conduct (in Serbian, child friendly version)