

BULGARIAN COMMUNITY FOR LIBERAL DEMOCRACY

www.boldbg.net I info@boldbg.net

CHILD PROTECTION AND SAFEGUARDING POLICY

1. Introduction

The Bulgarian Community for Liberal Democracy (BOLD) is a Bulgarian non-governmental organisation, which exists to support the development of society in the direction of the values of liberal democracy. It works towards achieving its vision for Bulgarian society to maintain democratic governance and a pluralistic political system in which the fundamental rights and freedoms of the people are protected and in which laws, policies, and practices are directed towards environmental and socio-economic justice. BOLD consists of individual members united by common goals, values , and principles. BOLD has two main goals:

1. To increase public support for democracy, human rights and fundamental freedoms
2. To help consolidate the liberal-democratic community in Bulgaria

This Child Protection and Safeguarding Policy outlines our unwavering commitment to protecting the children engaged with our organisation and ensuring their rights. It provides a framework of principles, standards, and guidelines that are to be adhered to at the individual and organisational levels. By implementing this policy, BOLD ensures that all members, volunteers, and third-party collaborators prioritise the safety and well-being of children in every aspect of their work.

2. Definitions and legal standards

In implementing this policy, BOLD strictly adheres to international and domestic legislation in this area. The international legal standards include the UN Convention on the Rights of the Child and its optional protocols, the European Convention on Human Rights, the European Social Charter and the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention). The relevant Bulgarian legislation is the Child Protection Act, the Family Code, the Penal Code and the Protection against Discrimination Act, with some standards also found in the sectoral legislation for the education, health and social systems.

The following are definitions of key terms in this policy:

- **Safeguarding** encompasses all actions aimed at protecting children from mistreatment and abuse, preventing harm that could negatively impact their health or development and promoting children's well-being to ensure they reach their full potential.
- **Child protection** is a critical aspect of safeguarding, involving specific actions taken to protect children who are suffering or at risk of suffering significant harm.
- **Child:** For the purposes of this policy, a child is defined as any person under the age of 18, in accordance with the UN Convention on the Rights of the Child. This definition aligns with Bulgarian legislation, which similarly recognises all individuals under 18 as minors, entitled to special protection and care.

- **Direct contact with children:** Direct contact with children refers to being physically present with children during activities organised by BOLD, regardless of the frequency or duration of the interaction, as well as to direct online contact with children. This includes, but is not limited to, activities in schools, groups, training sessions, non-formal education, workshops, conferences and other events. This definition encompasses all forms of engagement with children in the context of BOLD's activities.
- **Indirect contact with children:** This involves having access to information about children and their personal data in the context of BOLD's activities, as well as providing support to or partnering with organisations that work directly with children, thereby indirectly engaging with children through these collaborative efforts.
- **Child abuse:** According to the World Health Organization, child abuse or ill-treatment encompasses "all forms of physical and/or emotional ill-treatment, sexual assault, acts of neglect, or commercial or other exploitation, occurring within a context of responsibility, trust, or power, which may harm the health, survival, development, or dignity of the child." There are different types of child abuse.
- **Physical abuse:** Physical abuse refers to the intentional or unintentional infliction of harm or attempted harm to a child. This includes, but is not limited to, actions such as punching, slapping, biting, burning, strangulation, poisoning, and drowning.
- **Sexual abuse:** Sexual abuse involves engaging a child in sexual activities that they do not fully understand, are not developmentally ready for, or to which they cannot knowingly consent. This includes direct sexual contact (e.g., kissing, touching, penetration), encouraging children to view pornographic material or sexual acts, and sexual exploitation through prostitution, trafficking, or solicitation with harmful intent.
- **Emotional abuse:** Emotional abuse involves failure to meet a child's basic emotional needs over an extended period, resulting in harm to their emotional development. This includes consistently ignoring or rejecting the child, instilling fear and a sense of danger, isolating the child from social interactions, and subjecting them to degrading and humiliating treatment.
- **Neglect:** Neglect is the failure to provide for a child's essential needs over a prolonged period, despite having the means to do so, which adversely affects their health and physical development. This includes inadequate clothing, food, or shelter, insufficient supervision and protection, and lack of access to necessary medical care or treatment.
- **Exploitation:** Exploitation refers to the physical, mental, or emotional abuse or neglect of a child for financial or other purposes. This includes commercial sexual exploitation, child trafficking and child labour.

- **BOLD stakeholders:** This includes members of BOLD, employees and contractors, volunteers, interns, consultants and other individuals and legal entities, which are involved with BOLD's work.

3. Scope of the policy

BOLD has zero tolerance for child abuse in any form, exploitation and neglect. The principles set out in this policy apply at all times, during and outside working hours and during periods of leave, without exception. The policy applies to all individuals and legal entities affiliated with BOLD, regardless of age, gender, sexuality, disability, religion, ethnic origin, socio-economic status or any other protected characteristic.

BOLD takes seriously all concerns and complaints about child abuse, exploitation and neglect involving BOLD stakeholders. BOLD initiates a rigorous investigation into complaints that indicate a possible violation of this policy and takes appropriate disciplinary action as justified.

This document presents BOLD's vision for preventing and responding to child abuse, exploitation and neglect, and sets out specific approaches to create and maintain a safe and respectful environment for the people BOLD supports and for BOLD stakeholders.

Under this commitment, BOLD firmly believes that protecting children from child abuse, exploitation and neglect is necessary to ensure that:

• *Children are protected*: no procedure or standard can offer full protection, but they can help minimise the risk of harm to children and vulnerable people;

• *BOLD stakeholders are protected*: by implementing the policy and standards, stakeholders will be aware of how they are expected to behave with children and what to do if there are concerns about children's safety;

• *The organisation and its reputation are protected*: by implementing policies and standards, the organisation clarifies its commitment to maintaining the safety of children and is less vulnerable to false or unfounded accusations related to child protection concerns.

Youth and vulnerable adults may also be the subject of this policy if concerns related to their protection from abuse and exploitation emerge.

4. Key principles

In order to safeguard children and to ensure the integrity of BOLD's activities, the following six basic principles must be respected:

1) Child abuse, exploitation and neglect by BOLD employees and contracted personnel constitute acts of gross misconduct and shall therefore be grounds for termination of the contract. Any violation of this policy is a serious concern and may result in disciplinary action, including dismissal, in accordance with applicable laws.
2) All forms of humiliating, degrading or exploitative behaviour by BOLD stakeholders are prohibited. They must treat all children with respect and will not use language or behavior towards children that is inappropriate, harassing, abusive, provocative, degrading or culturally inappropriate.
3) Sexual activity with children is prohibited, regardless of the age of majority or the age of consent at local level. Erroneous belief in a child's age is not a defense and will not be tolerated as an excuse.
4) BOLD stakeholders will not employ children for domestic or other work that is inappropriate given their age or developmental stage, that interferes with their time for education and recreational activities, or that exposes them to risks.
5) When a BOLD stakeholder or beneficiary develops concerns or suspicions about child abuse, exploitation and neglect by another BOLD stakeholder, they must immediately report those concerns to the BOLD Contact Point in accordance with the existing Complaint Mechanism.
6) BOLD stakeholders are required to create and maintain an environment that prevents child abuse, exploitation and neglect and encourages the implementation of this policy.

The capacity of BOLD to achieve its vision and mission depends on the individual and joint efforts of all BOLD stakeholders. To this end, all BOLD stakeholders must maintain and promote the highest standards of ethical and professional conduct and comply with BOLD policies. All existing BOLD stakeholders must be acquainted with this policy immediately following its adoption, or within two weeks of beginning their engagement with the organisation.

5. Procedures, roles and responsibilities

BOLD intends to deliver on its commitments set forth in this policy through the following approaches:

- TRAINING AND AWARENESS: Ensuring that all BOLD stakeholders, as well as beneficiaries and target communities, are aware of what child abuse, exploitation and neglect are, the risks and consequences associated with them, and BOLD's zero tolerance for them.

• PREVENTION: Ensuring that BOLD stakeholders prevent child abuse, exploitation and neglect through safe recruitment, safe cooperation agreements, safe programming, and safe communication practices, and by fostering an environment in which all BOLD stakeholders work to minimize protection risks.

• REPORTING: Ensure that complaint mechanisms for reporting cases of child abuse, exploitation and neglect are in place and accessible, especially for beneficiaries of BOLD programmes and projects, and that all BOLD stakeholders are aware of what procedures to follow when concerns or suspicions arise. Whistleblowers shall be protected.

• RESPONSE: Ensure that appropriate measures are taken to protect and support victims if a child abuse, exploitation and neglects incident arises and that proportionate action is taken when suspicions are validated.

While it is the responsibility of all BOLD stakeholders to adhere to this policy and to create and maintain an environment that prevents child abuse, exploitation and neglect, BOLD recognises that clearly defined governance will facilitate the implementation and enforcement of the policy. The following outlines the relevant roles and responsibilities within the organisation:

Executive Director: The Executive Director of BOLD will be responsible for the overall responsibility for implementing and ensuring compliance with this policy, as well as for mobilising the necessary resources related thereto.

The Child Protection Focal Point will lead the awareness and training on the policy and related standards of conduct and receive complaints and reports of alleged violations. They will be responsible for ensuring a correct and effective response in accordance with the relevant guiding principles and established procedures.

5.1. Procedure on recruitment of personnel

All BOLD personnel, regardless if under civil contracts or labour contracts, shall be interviewed with a view to establishing both their suitability for the position and any potential risks or red flags regarding child abuse, exploitation and neglect.

During the interview process, candidates should be asked about their awareness and attitude towards child abuse, exploitation and neglect. Remember that abusers seem completely "normal", they are often very experienced in deception, pandering behavior and flattery (of organisations, as well as children and individuals). During the interview, the candidate must be informed that BOLD takes all matters of protection seriously, and that if successful, the

applicant will be required to adhere to this policy. Interviewers should pay attention to gaps in employment and/or frequent job changes, particularly if the candidate has previously worked directly with children and/or vulnerable persons.

For positions involving direct contact with children, a criminal record check will be undertaken. For positions involving indirect contact with children, communications and PR, it should be discussed what the candidate's views are regarding photos of children and what needs to be avoided (e.g. protection of identity, if the photo depicts prostituted children/children in conflict with the law, their faces should be blurred and their names changed; if the photo was taken without the permission of the children; etc).

References should be checked for any charge of child abuse or misconduct. It is recommended to speak directly by phone with reference persons to ask questions related to protection and safeguarding concerns. Referees should be asked about their relationship with the candidate. This often reveals that the referent has scant knowledge of the candidate. They should always be asked specifically if they are aware of any problem or incident with child abuse, exploitation and neglect related to the applicant.

Acceptance and compliance with this policy and its standards of conduct is a prerequisite for entering into any form of contractual relationship with BOLD. BOLD will not enter into contracts with legal entities or individuals who do not recognise the principles set forth in this policy and do not commit to protection from child abuse, exploitation and neglect. BOLD will not hire or employ anyone with a prior conviction for child abuse, exploitation and neglect or related offence, or permit such a person to hold a position with direct contact with beneficiaries or access to their personal information. All personnel shall sign a declaration (Annex 1) confirming that they are aware of and agree to comply with this policy.

5.2. Procedure on training and awareness

For effective implementation of this policy, BOLD's commitment to protection from child abuse, exploitation and neglect needs to be understood clearly and accurately by all BOLD stakeholders, including personnel and associates, as well as beneficiaries and target communities.

Therefore, BOLD is committed to the following:

- Include in the induction process for all new employees, volunteers and contracted personnel information about what child abuse, exploitation and neglect is and the content of

the Child Protection and Safeguarding Policy in order to ensure that they are aware of its guiding principles, the related standards of behavior, the implications of breaching these standards and the incident reporting procedures.

- Raise awareness widely amongst target communities on what child abuse, exploitation and neglect is, their right to be safe from it, BOLD's zero tolerance towards it and options for reporting incidents. Beneficiaries will be informed about the procedures for reporting incidents in a manner which is age, gender and diversity sensitive.

- Monitor and regularly review the effectiveness of the training and awareness measures, including by collecting feedback from BOLD stakeholders.

5.3. Procedure on safe communications

BOLD has a duty to look after the beneficiaries of its activities and must always put their best interests first. Beneficiaries have the right to be accurately represented and BOLD assumes its responsibility not to present a manipulated or sensational image of the beneficiaries' well-being. Beneficiaries must be presented as human beings with their own identity and dignity preserved, and this especially applies to children. Photographs and other identifying data of children pose a risk to their safety and dignity. The 'Do No Harm' principle should guide the collection and use of images and information about children.

BOLD stakeholders are required to adhere to the following standards of conduct when recording and using images and stories:

- Make sure that when you take images of children (photos, videos, etc.), they are depicted respectfully and are appropriately dressed and positioned. Choose images and related messages based on values such as respect and equality. Images should represent a wide range of people – boys and girls, different ages, abilities and backgrounds.
- Children should not be presented solely as victims. Present the specific situation faithfully in both its immediate and broader context. Avoid approaches that potentially stereotype or sensationalise people, situations, or places. Make sure that the children whose situation is represented have the opportunity to tell their own stories.
- Personal stories and images can only be used with the full understanding and informed consent of the subject (parent/legal guardian/caregiver, where applicable). The informed consent must be signed and archived in a safe place, in accordance with GDPR regulations.

- Change the names of children to protect their identity, unless they and their legal guardians have explicitly stated a preference for using their real name and the security implications are not a factor.
- Do not disclose personal information (such as location) on the BOLD website or in public documents that could put beneficiaries at risk.
- Report inappropriate or invasive images in a timely manner using the same procedure as for reporting suspected incidents of child abuse, exploitation and neglect.
- Social media content generated by BOLD – e.g. blogs, Facebook or Twitter posts – are subject to the same safe communication practices as described above.

5.4. Procedure on reporting and protection of whistleblowers

All incidents related to child abuse, exploitation and neglect, or suspicions thereof, shall be reported to the Child Protection Focal Point. The following algorithm will be applied:

- **Recognise and record:** If you observe signs of child abuse, exploitation and neglect, or a child discloses information, write down the facts immediately. Record the date, time, place, people involved, and, where possible, the child's exact words. Do not promise confidentiality.
- **Report without delay:** Inform the Child Protection Focal Point by using the Incident Reporting Form in Annex 2. If the Focal Point is not available, report to the Executive Director or a member of the BOLD Board of Directors.
- **Do not investigate yourself:** Do not conduct your own inquiries or approach the alleged perpetrator. Limit questions to clarifying immediate safety concerns.
- **The Child Protection Focal Point will**:
  - ensure that all materials relating to reports are handled in strict confidentiality and in accordance with applicable complaint handling procedures;
  - take appropriate measures to ensure the safety and protection of the victims or potential victims of child abuse, exploitation and neglect, as well as the alleged perpetrators and complainants, if they are different from the victim;
  - ensure that the child protection services are informed as per the requirements of the Child Protection Act, and assist them (as well as other state bodies, such as the police or prosecution) with investigations;
  - when the victim or their legal guardian consents, immediately refer them to internal and/or external services, so that they can receive the medical, psychosocial, legal and material support they need, or directly help them receive immediate medical assistance when needed;

- inform the Executive Director of BOLD about the actions taken;
- keep a secure record of all reports and notify the reporting stakeholder of actions taken.

- **Confidentiality:** Information must be shared only on a strict need-to-know basis, in line with the Child Protection Act and the Personal Data Protection Act.

Children who are the subject of concerns or disclosures are entitled to protection at all stages of the reporting and response process. All actions taken by the organisation will prioritise the child's safety, dignity, and rights, ensuring that they are not exposed to further harm, intimidation, or undue stress. Any measures taken to investigate or respond to concerns will be conducted sensitively, with the child's best interests as the primary consideration, and in accordance with national child protection laws and international standards.

Any BOLD stakeholder or beneficiary who reports a concern regarding suspected child abuse, neglect, or exploitation in good faith will be protected from retaliation, victimisation, or any adverse consequences related to their employment or engagement with the organisation. Reports may be made confidentially, and the identity of the whistleblower will be safeguarded to the fullest extent possible. However, any intentionally false, malicious or vexatious statement, misrepresentation or accusation against another BOLD stakeholder or third party will also be considered serious misconduct.

The organisation will provide support to whistleblowers and affected children throughout the process. This may include counselling, guidance, or access to external support services. All reports and records will be handled securely and shared only on a need-to-know basis to ensure both the child's protection and the whistleblower's confidentiality. Breaches of this protection, whether through retaliation against the reporter or failure to safeguard the child, will be treated as a serious violation of organisational policy and may lead to disciplinary or legal action.

Annex 1

Declaration of agreement to be bound by and uphold the Child Protection and Safeguarding Policy

I, the undersigned_____, hereby acknowledge that I have received, read and understood the BOLD Child Protection and Safeguarding Policy, and pledge to abide by the expectations and provisions therein.

I am fully aware that should I fail to comply with these policies and related standards of behavior, I will be liable to suspension, summary dismissal and/or face legal implications commensurate to the offence/crime I will have committed.

I testify that I have no prior criminal record in any country related to child abuse, exploitation or neglect and I have never been involved in any form of to child abuse, exploitation or neglect before.

I commit to respect and promote implementation of these policies at all times while under collaboration with BOLD by the way I conduct myself and by reporting any violation of the related standards of behavior that come to my knowledge.

To show my acceptance and commitment to comply with the BOLD Child Protection and Safeguarding Policy, I hereby sign this declaration form.

Signature:
Name:
Position:
Place:
Date:
Relationship with BOLD:

- *Staff*
- *Volunteer / Intern*
- *Consultant*
- *Other (specify)*

Annex 2

Incident Reporting Form

If you have seen an actual incident or suspect and have cause for concern regarding an incident of child abuse, exploitation or neglect, please follow the guidelines and fill out the questions below where appropriate. It is important that you identify in this form whether it is an actual incident or a suspected incident.

BOLD stakeholder details (reporting person):
Name:
Position:
Relationship with BOLD:
Contact Details:

Victim details:
Name:
Sex:
Age:
Nationality:
Village/Town:
Municipality/District:
Country:

Parent/Legal Guardian/Caregiver details:
Name:
Sex:
Age:
Nationality:
Relationship with the victim:
Village/Town:
Municipality/District:
Country:

Incident details:

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Has the incident been seen or is the incident suspected?

Who disclosed the incident to you?
Date of the alleged incident:
Time of the alleged incident:
Location of the alleged incident:
Was there any other individual involved in the alleged incident? If so, who?
Was there any witness? If so, who?

Alleged perpetrator details:
Name:
Sex:
Age:
Nationality:
Position:
Relationship with BOLD:

Observations (including physical injuries or other observations):
Action Taken:

SIGNATURE:

DATE: