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[PROSTOR]

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razvoja kroz kulturu

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CHILD PROTECTION POLICY

CULTURE HUB CROATIA

Split, April 2025

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INTRODUCTION

As a non-profit organisation, officially founded in 2017, Culture Hub Croatia (CHC) has in its core value:



CHC is using education, culture and creativity for development of local communities through transmission of knowledge and expertise and promotion of art practices. This is mainly achieved through establishing meaningful partnerships and collaborations at the national and international levels, actively addressing local challenges and using arts and culture as a tool.

Through our physical creative hub PROSTOR in Split our mission is to create an inclusive place for networking of creatives, initiate and facilitate development and implementation of projects of social interest, nurturing the value of transparency and mutual trust, with frequent experimentation going beyond traditional ways of doing things and often questioning established social norms.

CHC's mission is also to empower and build the capacity of artists and workers in the cultural and creative sector, to encourage and promote creativity, contemporary art and intercultural dialogue but also to involve different types of audiences, including youth, and the general public in actively shaping their neighbourhoods and environments.

Culture Hub Croatia aspires to create a safe work environment, filled with mutual respect, where every individual, no matter of their sex, age, race or background - feels secure. In many of our projects, both local and international, and also in our physical creative hub Prostor, we gave and will

continue to give youth a chance to be part of the cultural scene, while also giving them a safe place to express themselves.

In its work, all employees, volunteers and all associates of this organisation respect and implement this Child Protection Policy while working on projects that include children and youth. Therefore, this policy was adopted with the aim of protecting the dignity, rights, safety and well-being of children and promoting awareness of the responsibility for ensuring the protection of children in research and in CHC activities involving children.

This document presents a set of values and behaviors that CHC employees, volunteers and other associates should adhere to, as well as responsibilities in ensuring a safe environment when conducting research and other activities involving children.

The child protection policy applies to all research and institute activities involving children under the age of 18.

In accordance with Art. 43 of the Law on Gender Equality (Official Gazette 82/08, 69/17), words and concepts used in this document, which have a gender meaning, refer equally to the male and female genders, regardless of whether they are in the masculine or feminine gender.

LEGAL FRAMEWORK OF THE CHILD PROTECTION POLICY

International and national positive regulations, and institutional acts have been regarded in the development of this policy:

1. United Nations Convention on the Rights of the Child (1989)
2. Council of Europe Convention on the Protection of Children from Sexual Exploitation and Sexual Abuse (2007)
3. The Charter of Fundamental Rights of the European Union, Article 24
4. Treaty on the European Union, Article 3
5. Communication from the European Commission: EU Agenda for the Rights of the Child
6. Constitution of the Republic of Croatia
7. Act on Legal Consequences of Conviction, Criminal Records and Rehabilitation (OG 143/12, 105/15, 32/17, 53/22)
8. Family Act (OG 103/15, 98/19, 47/20)
9. Act on the Implementation of the General Data Protection Regulation (OG 42/18)
10. Anti-discrimination Act (OG 85/08, 112/12)
11. Penal Code (OG 125/11, 144/12, 56/15, 61/15, 101/17, 118/18, 126/19, 84/21)
12. Volunteerism Act (OG 58/07, 22/13, 84/21)
13. Ombudsman for Children Act (OG 73/2017)
14. Rules of Procedure of the Ombudsman for Children (OG 49/2018)
15. Code of Ethics for Research with Children (2020)

DEFINITIONS OF LEGAL TERMS

Child - any person under the age of 18, in accordance with the UN Convention on the Rights of the Child (1989).

Child abuse - according to the World Health Organization (1999), it includes all forms of physical and/or emotional misbehaviour towards a child, sexual exploitation, neglect and exploitation of a child, which results in actual or potential damage to the child's health, development and dignity.

Protection of the child - a common term that includes principles, regulations, standards, laws and procedures aimed at protecting children from intentional and unintentional harm. In the context of this document, it refers specifically to the responsibilities of the organization and staff in protecting the children we work with.

Direct contact with children is any contact where the person is in physical proximity to the child.

Indirect contact with children includes all situations in which a person has access to a child's personal information (e.g. name, address, photos, etc.) in the context of work in an organization.

Physical abuse - one time or repeated gross and intentional infliction of pain and physical injury, as well as irresponsible behaviour of parents and other persons that includes a potential risk of physical injury, the consequences of which may or may not be visible. Includes hitting the body with hands or objects, slapping, pulling hair, throwing on the floor, shaking roughly, inflicting burns or cuts, attempted strangulation or drowning, tying to pieces of furniture or similar objects, locking in isolated rooms, poisoning with food, drugs or alcohol.

Emotional abuse - is continuous hostile and/or indifferent behaviour of parents and other persons acting from a position of power, on the basis of which the child can conclude that they are worthless and unloved. Emotional abuse includes rejecting and humiliating a child, terrorizing and threatening violence, isolating and restricting freedom, excessive pressure

and violation of personal boundaries, ignoring, emotional unavailability and witnessing violence in the family.

Neglect - is failure to meet the child's needs to an extent that significantly affects the child's physical and psychological development. It can be emotional, educational, physical and health.

Sexual abuse - is any sexual contact between a child and an adult (or an adolescent five or more years older than the victim), whereby the adult uses the child to satisfy his or her own sexual needs. It includes the following forms of behaviour: exposing the child to sexual content, having sex and masturbation in the presence of the child, making suggestive sexual comments, showing private parts of the body, persuading the child to undress and/or masturbate, touching and kissing the child's private parts, asking the child to touch intimate parts of the body, penetration with a finger, penis or object, rubbing of the genitals against the child's body or clothes, sexual intercourse (vaginal, anal, oral) and attempted sexual intercourse.

PRINCIPLES

In research and professional activities involving children, CHC employees should adhere to the following principles:

- ❖ The principle of protecting the well-being of the child and his/her right to physical, psychological and emotional integrity;
- ❖ The principle of respect for human rights, values and dignity of the person;
- ❖ The principle of respect for the privacy and anonymity of participants;
- ❖ The principle of respect for the right of the child to self-determination and the right to express his or her own opinion;
- ❖ The principle of accountability in case of ethical doubts;
- ❖ The principle of protecting the integrity of science and scientists;

- ❖ The principle of objectivity, accuracy and fairness in work, which includes the obligation to report on the results of research.

PLANNING AND CONDUCTING OF THE RESEARCH INVOLVING CHILDREN

1. When planning and conducting research, and disseminating results, researchers/employees have an obligation to act in accordance with the highest ethical and internationally accepted standards of scientific research work.
2. Research must be based on scientific and professional knowledge of scientific disciplines addressing children.
3. The potential risks of children's participation in research procedures should be completely eliminated or minimised.
4. Research procedures should be adapted to the age, abilities and maturity of the child.
5. The circumstances in which the research is conducted must guarantee the physical and psychological safety of the child.
6. Informed consent is required to conduct the research.
7. For children of up to fourteen years of age, informed consent (usually in writing) is given by the parent/guardian first. After parental consent, consent should be sought from the child (if the age, language or cognitive abilities allow).
8. The researcher is obliged to explain the purpose, objectives and methods of the research to the child and the parent/guardian in an understandable manner, and to point to: the voluntariness of participation (respecting the principle of conscious and voluntary participation); the right to withdraw from participation in the research; the confidentiality of the data obtained; the protection of privacy, as well as the potential consequences and risks of participation in the research.
9. A child over the age of fourteen gives informed consent independently. Prior to seeking the child's consent, the researcher is obliged to inform

parents/guardians about the research. Exceptionally, in the case of a particularly sensitive subject, the researcher may request parent's/guardian's consent also for children above the age of fourteen.

10. Unlike informed consent, which implies a voluntary consent to participate in the research, approval is a voluntary and informed consent to the processing of personal data. Approval is required if the research does not ensure the anonymity of the data. Approval to the processing of personal data for a child under the age of 16 shall be given by the parent or guardian.

11. Researchers should conduct online research with particular care and attention (consent, confidentiality, privacy protection). The conducting of online research involving children requires additional elaboration of the ethical aspects of the research provided by the researchers, and a particular attention of the ethics committee.

12. During online research with children, it is necessary to implement measures of the General Data Protection Regulation and use data collection services that guarantee the researcher exclusive access to data (without retaining the data at the service platform or forwarding them to other users).

UNACCEPTABLE BEHAVIOUR WHEN WORKING WITH CHILDREN

CHC's employees and other representatives consider the following behaviours unacceptable and subject to sanctions:

- ❖ Neglecting young people they work with and ignoring their special needs;
- ❖ Insulting young people based on any criteria;
- ❖ Hitting or physically assaulting children during programs and activities;
- ❖ Physical, psychological, or emotional abuse of minors;
- ❖ Gender-based violence;

- ❖ Engaging in sexual activity or relationships with persons under 18, regardless of the legal definition of adulthood or recognized consent in different countries. A misunderstanding about a minor's age cannot be considered a valid defense;
- ❖ Relationships with minors that could be considered exploitative, abusive, or harmful;
- ❖ Using inappropriate language or making inappropriate and offensive suggestions and advice;
- ❖ Acting to shame, humiliate, demean, or scorn a minor, or any other form of emotional abuse;
- ❖ Using drugs or harmful substances with minors;
- ❖ Discriminating against minors or favoring some while excluding others;
- ❖ Failing to report observed neglect or abuse of young people by family, peers, or the community;
- ❖ Manipulating with the research (for example, asking suggestive questions/manipulating with children's answers, distorting of the research findings, and similar ethically inappropriate research practices).

Additionally, during research and other activities with children organized and implemented by the CHC, the following are considered unacceptable:

- ❖ Insulting young participants by other participants, peers, or other individuals;
- ❖ Discriminating against young participants on any basis by other participants or involved individuals;
- ❖ Physical, psychological, and emotional abuse of young participants by others in the programs and activities;
- ❖ Gender-based violence by other participants and involved individuals;
- ❖ Sexual violence by other young participants or involved individuals against minors;

- ❖ Radicalization and extremist behavior by participants and involved individuals.

This list is not exhaustive or strictly defined, meaning that any action or behavior that could be deemed inappropriate or potentially offensive towards minors should be avoided.

SAFE RECRUITMENT PROCEDURES

CHC is committed to ensuring that during the recruitment of new personnel, volunteers, collaborators, and other individuals who may work with children, the following measures are taken:

- ❖ Minimizing the likelihood of engaging potential abusers through strict checks and high standards during recruitment and selection;
- ❖ Rejecting unsuitable candidates at the application or interview stage;
- ❖ Preventing child abuse by developing comprehensive policies and agreements on safety practices;
- ❖ Creating detailed and clear job descriptions for individuals working with children, whether they are employees, volunteers, or collaborators.

WHEN HIRING PEOPLE:

Competences and knowledge for working with the population relevant to the Association.

- ❖ Candidates for employment go through a selection process that includes legal knowledge and communication skills.
- ❖ Employees undergo additional and specialized training for work.

- ❖ All employed persons that will work on a project which includes children are required to submit a certificate of non-criminality not older than 6 months when applying for work, as well as an additional certificate that no criminal proceedings have ever been conducted against the person.

WHEN CHOOSING VOLUNTEERS:

- ❖ After applying for volunteering, volunteers come for an interview with one of the co-founders, where the motivation and suitability of the candidate for the volunteer position is assessed.
- ❖ The selected volunteers go through mandatory education, which consists of the legal and communication part, as well as practical visits to the Prostor before signing the volunteer contract.
- ❖ All volunteers that will participate in projects which include children are required to attach a certificate of non-criminality not older than 6 months, as well as an additional certificate that no criminal proceedings have ever been conducted against the person.

WHEN CHOOSING PARTNERS AND ASSOCIATES:

- ❖ Checking the ability and comparability of the values and goals of associates and partners in promoting the values that stand as the foundation of the Association.
- ❖ Checking and assessing the commitment to the protection of children.

Every new individual joining the CHC who is expected to work with children and youth will be required to read and become familiar with the child protection policies and safety practices implemented in the CHC, as well as the procedures and sanctions that apply in case of policy violations. This procedure will be conducted before the individual signs an employment or volunteer agreement, under the supervision of the one of co-founders.

New individuals working with children will also undergo training on implementing these policies. Such training will be conducted by more experienced colleagues who work with children. Additionally, at the beginning, new individuals will not conduct activities with children independently but will be supervised by experienced employees of the CHC to ensure proper implementation of child protection policies and reduce the likelihood of unacceptable behavior due to inexperience or lack of knowledge.

RESPONSIBILITIES OF THE CHC AND ITS EMPLOYEES WHEN WORKING WITH CHILDREN

CHC's employees, along with other individuals associated with the CHC who work with children, consider themselves responsible for the safety and protection of children with whom they work, interact, or come into contact through their work.

In all activities involving minors, CHC ensures a safe space where they are protected from harm and where they can actively participate in activities. CHC's staff and representatives will always uphold the highest standards of behavior towards children, as outlined in this "Child Protection Policy."

CHC is committed to:

- ❖ Ensuring its staff and representatives are aware of child rights violations;
- ❖ Ensuring its staff and representatives create safe spaces to prevent risks of physical and psychological harm to minors, as well as potential abuse;
- ❖ Ensuring all staff and representatives working with children have the necessary knowledge and methods, whether pedagogical or related to working with children and are capable of creating activities and

programs that minimize the aforementioned risks to the greatest extent possible;

- ❖ Ensuring its staff and representatives effectively respond to any reported abuse, providing support, protection, and care for the minors involved;
- ❖ Reporting to relevant institutions or other organizations if employees, and other associates of CHC become aware of any harm inflicted on a child we work with by someone in their family or community, outside of our activities and programs;
- ❖ Ensuring that all CHC partners working with children are aware of child protection policies and that all joint activities follow these policies. To this end, a clause related to the implementation of children protection policies will be added to partnership agreements for projects or activities involving young people;
- ❖ Familiarizing all collaborators and others involved in the implementation of programs and activities with the child protection policies and ensuring their application.

Child and children protection includes attention to:

- ❖ Health, well-being, and safety;
- ❖ Recognizing their needs, especially those related to health;
- ❖ Recognizing the needs of children with special requirements and learning-related issues;
- ❖ Providing first aid;
- ❖ Emotional well-being;
- ❖ Online safety and related issues;
- ❖ Appropriate planning for children during field trips, excursions, etc.

CHC's employees will ensure the following in all activities involving children and minors:

- ❖ Protection of children from mistreatment and abuse;
- ❖ Prevention of possible negative impacts on children's health or development;

- ❖ Ensuring children grow and develop in a safe and nurturing environment;
- ❖ Taking all steps necessary to achieve the best outcomes for all children.

PERSON RESPONSIBLE FOR REPORTING AND TAKING ACTION IN CASES OF SUSPECTED MISCONDUCT

In cases of suspected misconduct or abuse committed by any employee, collaborator, or volunteer against children, the child, young person, or any adult associated with them is obligated to report this to the Head of International Cooperation and Strategic Development. If the individual under suspicion is the Head of International Cooperation and Strategic Development, concerns about misconduct or abuse must be reported to the CHC's Coordination Board.

Every person associated with the CHC must ensure safety when working with children and feel encouraged to share any concerns or suspicions of inappropriate or unacceptable behavior by any employee or volunteer with the Director of Projects. They must also be assured that their concerns will be taken seriously.

Protocols for the protection of children

If there is suspicion or knowledge that a child is at risk, i.e. exposed to any form of abuse by peers or an adult, the employees, associates and volunteers of CHC in all programs and projects are obliged to:

- Inform the Head of International Cooperation and Strategic Development of the suspicion or knowledge
- Make a written note about suspicion or knowledge.

Upon receiving such concerns, the Head of International Cooperation and Strategic Development of CHC is obliged to:

- Ensure that the child expressing their concerns is safe and removed from the employee or associate of the CHC against whom the concerns or accusations are directed;
- Contact the child's parents or guardians;
- Review the employment contract of the individual in question, and if no safe means of amending it exists, suspend the employee while the investigation is ongoing;
- Conduct any disciplinary investigation only after the child safety investigation has concluded.

In order to ensure the protection of children in all programs and projects, all employees, associates and volunteers of CHC sign the Confidentiality statement and if needed Photography and recording consent for employees, associates and volunteers of the CHC, which confirms compliance with this Child Protection Policy.

POLICY IMPLEMENTATION

The following criteria define proper policy implementation:

- ❖ The policy is disseminated among CHC staff and representatives;
- ❖ The child protection policy will be published on CHC's website and always accessible to anyone interested;
- ❖ Recruitment and selection processes reflect CHC's commitment to child protection. Failure to meet aspects related to the policy must be considered a serious violation of CHC's work ethics and principles;
- ❖ All activities involving minors must be evaluated in advance to identify potential risks to child protection and develop appropriate monitoring systems;
- ❖ Regarding the use of information and communication technologies (internet, websites, social media, digital photography), CHC emphasizes ensuring conditions in which minors are protected from any possible risks;
- ❖ Employees conducting activities and programs will familiarize the children they work with, their parents, guardians, and other individuals responsible for children care with the child protection policies to clarify the expected behavior of staff and CHC personnel, as well as prohibited behaviors and appropriate responses in case of violations.

RESPONSIBILITIES OF CHC

CHC's staff and representatives are responsible for creating a work environment that promotes the implementation and development of the principles outlined in this policy.

Depending on their roles, staff members are responsible for ensuring an equitable work environment at the locations where project activities are conducted.

Individuals organizing and implementing activities involving children are responsible for ensuring their safety and protecting them from all previously mentioned risks.

CHC staff and representatives also commit to:

- ❖ Being vigilant in recognizing situations that may pose risks to minors and knowing how to manage them;
- ❖ Reporting any concerns, suspicions, or knowledge of possible abuse or mistreatment of minors, as outlined in this policy;
- ❖ Organizing activities and workplace environments to minimize risks to the greatest extent possible;
- ❖ Respecting children's rights and treating them with consideration, honesty, and dignity;
- ❖ Encouraging children to participate and develop their ability to protect themselves;
- ❖ Ensuring that individuals who report unacceptable behavior by employees or other staff members are protected after doing so and are supported throughout the process;
- ❖ Reporting any suspicion of neglect or abuse of children by families, peers, or communities to the appropriate institutions or organizations.

ANONYMITY AND DATA PROTECTION

- ❖ Researchers are obliged to ensure confidentiality of the data on children participating in the research, and their claims.
- ❖ It is not allowed to disclose the identity of the research participant, except exceptionally, in the event of a threat to the life, health, and well-being of the child, in order to provide the necessary help to the child.
- ❖ The researcher is obliged to inform the children involved in the research about any possibility of revealing their identity that might occur.

- ❖ The researcher is obliged to communicate the main findings of the research to the children, parents/guardians and to the project Management Board, which the research was the part of. Exceptionally, the researcher may inform the research participants that the research results cannot be published before the completion of the entire research procedure (for example, in longitudinal research).
- ❖ After data collection is completed, the researcher is obliged to clarify any ambiguities and misunderstandings to the children involved in the research, and to answer their questions.
- ❖ Upon completion of data collection, the researcher is obliged to store the data and ensure their adequate retention. Data should be anonymized to protect privacy, and personal data that allow identification should be destroyed.
- ❖ Data, regardless of the level of anonymity, shall be stored for as long as necessary for the purposes for which they were collected or in accordance with the established rules on archiving or retention of data.
- ❖ When deciding on the sharing of primary data with other researchers in the context of open science (audio and/or video recordings, transcripts, etc.), the researcher is obliged to take care of the protection of the identity of children. If this is not possible, it is a scientifically acceptable practice to refuse to share qualitative data. When deciding on the sharing of primary data, children and their parents/guardians, who need to give consent for such a procedure, have a key role in the process.
- ❖ Researchers are obliged to report truthfully, responsibly, cautiously and in accordance with scientific principles, especially when it comes to research involving children from socially vulnerable groups.
- ❖ CHC employees will ensure the protection of data related to children and minors participating in the CHC's activities. Data collected during registration will be accessible only to individuals organizing and conducting the activities and will not be available to anyone else.

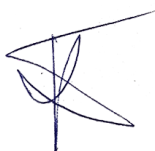
- ❖ If signature lists are used to confirm activity implementation and reporting, the data on such lists will be accessible only to the project coordinator and will be used solely for reporting purposes.
- ❖ Children will not be photographed or filmed without the consent of their parents or guardians. If photographing is necessary for reporting purposes, the photographs will not be published or shared with the public. If activities and programs involving minors are filmed or photographed, their faces will be blurred.

POLICY REVISION

- ❖ CHC's Child Protection Policy is available on the official website.
- ❖ This policy will be reviewed annually, or more frequently if it is determined that certain practices and provisions are inadequate or depending on the activities conducted with Minors.
- ❖ The Child Protection Policy is approved and signed by the Member of the Coordination Board.

In Split, April 15, 2025

Member of the Coordination Board,
Kristina Tešija



ANNEXES

CONFIDENTIALITY STATEMENT



As an employee/associate/intern/volunteer of the Culture Hub Croatia association, I give the following

CONFIDENTIALITY STATEMENT

I am aware that the data and information I learn while performing activities on CHC programs are confidential and that I may use them exclusively for activities within the framework of the agreed cooperation and with the consent of the responsible persons in the CHC platform.

With this statement, I undertake to:

- ❖ not share the information I have learned about the participants of the project or make it available to third parties in any other way, except in situations where I am legally obliged to do so,
- ❖ take all security measures to protect data confidentiality,
- ❖ not misuse information about people close to me or people I know or in any way let it be known that I am familiar with them.

If I am in any way responsible for the disclosure of data (intentionally or through negligence), I undertake to compensate for the resulting damage in agreement with the Culture Hub Croatia platform and the user(s).

This Statement is given solely for the purpose of protecting users/employees/associates/interns/volunteers of CHC from unauthorized disposal of confidential data and cannot be used for other purposes.

I have read and fully understand the Confidentiality Statement and I declare that I will comply with it.

Split, date

Name and surname:_____

Signature:_____

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PHOTOGRAPHY AND RECORDING CONSENT

I, _____ (parent's name and
surname)

GIVE/DON'T GIVE my consent (circle)

that my child _____ (child's
name and surname) participates in photography and recording
for the needs of the Culture Hub Croatia platform.

Further on,
I **GIVE/DON'T GIVE** my consent (circle)

that my child participates in photography and filming for print and
electronic media (press, television, radio and internet portals).

Culture Hub Croatia undertakes to use the mentioned materials only for the
purpose of projects involving children and young people and to take care of
preserving the dignity of children.

In Split, _____

Parent's signature