



CHILD PROTECTION & SAFEGUARDING POLICY

Organisation: Udruga 4 elementa

Country: Croatia

Effective date: 14. January 2026.

1. Purpose and commitment

Udruga 4 elementa is committed to creating safe, inclusive and respectful environments for all children and young people involved in its educational, cultural, environmental, youth and community programmes. The organisation applies a zero-tolerance approach to abuse, neglect, exploitation, discrimination, bullying and any behaviour that may place a child at risk.

This policy explains how Udruga 4 elementa prevents harm, manages risks, receives and responds to concerns, and learns from safeguarding situations. It is especially relevant for activities involving minors, including workshops, local and international projects, field visits, creative activities, digital activities and public events.

2. Legal and standards framework

This policy is aligned with applicable Croatian, EU and international standards, including the UN Convention on the Rights of the Child, the EU Strategy on the Rights of the Child and the European Child Guarantee, GDPR, the Croatian Family Act, the Croatian Social Welfare Act, the Croatian Criminal Code, national procedures for protection from violence and abuse, and the Keeping Children Safe safeguarding standards.

3. Scope

This policy applies to all staff, board members, members, volunteers, interns, facilitators, trainers, artists, external experts, contractors, partner representatives and visitors who act on behalf of Udruga 4 elementa or participate in its activities with children.

A child is any person under the age of 18. The policy applies to all children regardless of gender, ethnicity, language, disability, religion, social background, family status, nationality, migration status, sexual orientation, gender identity or any other personal characteristic.

4. Definitions of harm

For the purpose of this policy, harm may include physical abuse, emotional abuse, sexual abuse, neglect, exploitation, peer violence, discrimination, bullying, online abuse, grooming, non-consensual recording or sharing of images, exposure to harmful content, and any other behaviour that threatens the safety, dignity or development of a child.

5. Roles and responsibility

The Board of Udruga 4 elementa is responsible for approving, monitoring and reviewing this policy.

A **Designated Safeguarding Lead (DSL)** is appointed for each project or activity involving children. The DSL receives concerns, keeps confidential safeguarding records, coordinates the response and ensures that adults involved in the activity understand this policy.

All adults covered by this policy must prevent risks, follow the Code of Conduct, report concerns immediately and cooperate with safeguarding procedures. They must not investigate concerns on their own.

6. Prevention: safe planning, consent and onboarding

Before each activity with minors, Udruga 4 elementa prepares a simple child-safeguarding risk check covering the venue, supervision, transport, emergency contacts, medical needs or allergies, online tools, media use, bathrooms/changing areas, accessibility and emotional safety.

Participation of children requires written consent from a parent or legal guardian where required. Consent forms include the basic activity information, emergency contact details, medical or accessibility needs, data protection information, and separate options for photographs, videos and public communication.

Children are also asked for **age-appropriate assent**. The activity is explained to them in simple language, including what will happen, who they can speak to, how photos/videos may be used, and their right to say no or withdraw from a specific activity or from being photographed. A child's refusal to be photographed or recorded must be respected even if parental consent exists.

Every adult who interacts with children must complete onboarding before contact with minors. This includes: reading this policy, signing a statement of compliance, receiving a short briefing on the Code of Conduct and reporting route, providing relevant references or proof of suitability where appropriate, and submitting a criminal record certificate when the role involves regular or unsupervised work with children and this is lawful and proportionate.

External experts, artists, trainers and visitors must accept this policy in writing. They are supervised by a representative of Udruga 4 elementa and are not left alone with children unless this has been explicitly risk-assessed and approved.

7. Code of Conduct

Adults working with or around children must:

- treat every child with dignity, respect and fairness;
- use age-appropriate, non-violent and non-humiliating language;
- apply the two-adult rule whenever possible and avoid being alone with a child in a closed or hidden space;
- keep professional boundaries and avoid favouritism, gifts or special treatment;
- communicate with children only through approved project channels, preferably with a parent/guardian or another adult informed;
- use physical contact only when necessary, appropriate and connected to the activity or the child's safety;
- report concerns, disclosures, policy breaches or child-to-child harmful behaviour immediately.

Adults must not:

- hit, threaten, shame, humiliate, discriminate against or intimidate a child;
- engage in sexualised behaviour, sexual comments or any intimate relationship with a child;
- contact children privately through personal social media, personal phone numbers or private messaging;
- take or publish photos or videos without appropriate consent and assent;
- invite a child to a private home, hotel room or private space;
- consume alcohol, drugs or act under their influence during activities with children;
- promise secrecy if a child discloses harm.

8. Media, privacy and online safety

Personal data, photographs and videos of children are collected only when necessary and with appropriate consent. Materials are stored securely, with access limited to authorised persons. Public communication must not include identifying details such as full name, address, school, exact location or other sensitive information unless there is a clear reason and explicit consent.

Images must show children respectfully and in the context of the activity. Online activities use moderated and age-appropriate tools. Private chats between adults and children are avoided or disabled where possible.

9. Reporting concerns

Any concern, suspicion, disclosure or breach of this policy must be reported immediately to the DSL or to a member of the Board. Reporting is mandatory for everyone covered by this policy.

Udruga 4 elementa provides two reporting options:

- **In-person reporting:** directly to the DSL, activity leader or Board member.
- **Anonymous or confidential reporting:** through a dedicated project email, written note, online form or other channel communicated to participants at the start of the activity.

Children and parents/guardians are informed in simple language about who they can speak to if they feel unsafe. Anonymous reports are taken seriously, although they may limit the organisation's ability to follow up.

If there is immediate danger, the adult present must first ensure the child's safety and seek emergency help, including medical assistance or police intervention if needed.

10. Responding and administrative steps

All reports are handled confidentially and only by persons who need to know. The person receiving the concern listens calmly, reassures the child, records facts without leading questions, and immediately informs the DSL or Board. The report is entered into a confidential incident record.

The DSL makes an initial assessment and decides the next steps. Where there is suspicion of a criminal offence, serious abuse, immediate danger or legal reporting duty, the case is referred to the competent authorities, such as the police, social welfare services or other child-protection bodies.

For safeguarding incidents that do not require law-enforcement reporting, Udruga 4 elementa may apply internal administrative measures, depending on the seriousness of the situation. These may include: additional supervision, mediation or facilitated conversation where appropriate, written warning, removal of an adult from direct child contact, revision of the activity plan, informing parents/guardians, referral to psychosocial support, termination of cooperation, or additional training for staff and volunteers.

The organisation does not conduct criminal investigations. Its role is to protect the child, preserve relevant information, document decisions and refer cases to competent authorities when required.

11. Record keeping and confidentiality

Safeguarding records, consent forms, risk checks and incident notes are marked confidential and stored securely. Access is limited to the DSL, the Board and persons directly responsible for the response. Information is shared only on a need-to-know basis and in accordance with GDPR and applicable Croatian law.

12. Accountability, monitoring and learning

The DSL or Board keeps a confidential safeguarding log containing the number and type of concerns, actions taken and follow-up measures. After each significant activity with children, the team reviews whether safeguarding measures were sufficient.

At least once per year, or after a significant incident, the Board reviews this policy, the reporting channels, consent forms, onboarding process and activity procedures. Lessons learned are used to update practice, improve training and reduce future risks.

13. Key contacts


Internal contact: Designated Safeguarding Lead / Board of Udruga 4 elementa

External emergency contact in Croatia: Police - 112 or 192

Competent social welfare service / Croatian Institute for Social Work - according to the child's place of residence or activity location

Approved by the Board / General Assembly of Udruga 4 elementa.

Dvor, January 2026

 **UDRUGA 4 ELEMENTA**
Dvor, Donji Javoranj 38
OIB: 76698939861