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Z JASNIM POGLEDOM NAPREJ

CHILD PROTECTION POLICY AND GUIDELINES FOR THE PROTECTION OF CHILDREN AND YOUNG PEOPLE

A framework for protecting children's rights, supporting safe participation and preventing harm in SASS activities

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Aims and general principles

The School of Advanced Social Studies (onward SASS) is committed to respecting, promoting and protecting the rights, dignity, safety and well-being of every child who comes into contact with, participates in, or may be affected by its activities.

Every person under the age of 18 has the right to protection from all forms of violence, abuse, neglect, exploitation and discrimination. SASS has zero tolerance for child abuse and exploitation and is committed to high ethical standards whenever it works with children.

This Child Protection Policy and guidelines for the protection of children and young people (onward Policy) sets out the principles, responsibilities and minimum procedures that help create a safe environment for children and young people. It follows the four areas of the Keeping Children Safe International Child Safeguarding Standards[1]: Policy, People, Procedures and Accountability. The policy supports children's rights, meaningful participation and development alongside protection from harm. Children should receive information they can understand, be listened to, and have their views considered in decisions that affect them.

The Policy is also guided by the United Nations Convention on the Rights of the Child, applicable European standards and relevant Slovenian legislation.

The Policy applies to employees, management, researchers, students and volunteers acting for SASS, interns, consultants, contractors, visitors and other representatives. It also sets expectations for partners and third parties involved in SASS activities with children.

A child means any person under 18. Safeguarding concerns include disclosures, observed behaviors, allegations, boundary violations, unsafe practice, or any information suggesting that a child may be at risk.

[1] Available at: https://commission.europa.eu/document/download/f53f19ef-c655-4d63-91e5-db4fee59ca3e_en?filename=KCS-CS-Standards-ENG-200218.pdf

About SASS and its work with children

SASS is a higher education and research institution based in Nova Gorica, Slovenia. Its work includes higher education, scientific research, international cooperation, national and international projects, training, dissemination and engagement with communities.

Although SASS primarily works with adults and higher-education students, children and young people may participate in or be affected by certain institutional activities, particularly through:

- national and international research projects;
- Erasmus+ and other EU-funded projects;
- surveys, interviews, focus groups and other research activities;
- workshops and educational activities;
- cooperation with schools, NGOs and other organisations working with children;
- conferences, public events and dissemination activities;
- digital and online activities;
- communication and media activities involving children;
- activities targeting vulnerable groups, families or young people.

Safeguarding measures must therefore be considered across all relevant work, including activities where children are not the primary target group.

Research activities involving children

Research involving children requires particular care and must receive prior approval through the applicable ethics-review process conducted by SASS Research Ethics Committee before recruitment or data collection. Researchers are responsible for meeting high ethical standards regardless of the research method, topic or setting.

Children must receive clear, age-appropriate information about the purpose of the research, what participation involves, foreseeable risks, confidentiality limits and how to stop or withdraw. Participation must be voluntary and free from pressure. Obtain the child's informed, age-appropriate assent and parent or legal guardian consent where required by law, ethics approval or the study design. A child's objection, discomfort or distress must be respected even where an adult has consented.

Research protocols should assess whether children's involvement is necessary and justified, how benefits and burdens are distributed fairly, and how barriers to participation will be addressed. Researchers should reflect on how their assumptions, methods and power relationships may affect children during and after the research.

Personal data and research information must be collected only as needed, processed under an appropriate legal basis, stored securely and retained only for the approved period. Identifiable child data must not be placed in public AI tools or unapproved digital services.

Standard 1 - Policy and safe practice

Principles for all SASS activities

- **Best interests:** the child's safety and well-being are a primary consideration.
- **Equal protection:** all children have an equal right to protection without discrimination. Reasonable adjustments should address disability, language, culture and other needs; activity leads should consider how intersecting circumstances may affect safety or access to help.
- **Respect, dignity and participation:** children's privacy, views, identities and competencies are respected, and participation is voluntary.
- **Do no harm:** SASS takes reasonable steps to ensure its activities do not create or increase risks to children.
- **Shared responsibility:** everyone working for or on behalf of SASS is responsible for following the policy and reporting concerns.
- **Confidentiality with limits:** information is shared only with those who need it, while child safety and legal reporting duties take priority.

Potential harm includes physical, emotional and sexual abuse; neglect and exploitation, bullying, harassment and peer violence, gender-based violence and hate speech, discrimination, online abuse, and misuse of children's images or personal information.

Standard 2 - People and responsibilities

Promoting children's rights and protecting them are shared responsibilities. Everyone working for or on behalf of SASS must understand this policy, follow its Code of Conduct, stay alert to potential risks and report concerns without delay.

Role	Responsibility
SASS management	Approve and resource the policy; appoint a Safeguarding Focal Point and alternate; ensure independent and fair handling of concerns; review implementation.
Safeguarding Focal Point	Receive concerns; assess immediate safety; coordinate protective steps and referrals; maintain restricted records; advise and arrange training.
Project and activity leads	Assess and manage risks; brief participants; plan supervision and safe communication; report concerns promptly.
All covered persons	Follow the policy and Code of Conduct; complete required briefings; report concerns; cooperate with safe procedures.
Partners and contractors	Meet agreed safeguarding requirements and promptly notify SASS of concerns related to joint activities.

If a concern involves the Safeguarding Focal Point (onward Focal Point), report it to the alternative contact or directly to SASS management. If a concern involves management, or internal reporting could create risk or a conflict of interest, use the alternative route or contact the competent external authority. A person implicated in a concern must not manage its assessment.

Code of conduct

When interacting with children, staff and associates must treat them fairly and respectfully; maintain professional boundaries; respect privacy and personal space; and use children's images and personal information responsibly.

Where practicable, avoid isolated one-to-one situations. If individual contact is necessary, make it visible, time-limited, authorised and documented, and inform a second responsible adult. Never create secrecy with a child.

Use approved institutional channels for activity-related communication. Do not exchange personal social-media accounts or private messages with a child.

Respect a child's personal space. Any physical contact must be necessary, appropriate and consistent with the child's safety and needs.

Do not meet a child privately, offer special gifts or favours, or arrange unsupervised contact outside the authorised activity.

Do not take a child alone in a private vehicle or arrange private accommodation. Necessary transport or overnight arrangements require prior authorisation, a risk assessment and appropriate adult supervision.

Never engage in abusive, exploitative, humiliating, discriminatory or sexually inappropriate behaviour. Do not use physical punishment or harmful restraint.

Report boundary concerns, unsafe practice or suspected breaches promptly. Do not promise absolute confidentiality or investigate suspected abuse independently.

Safe recruitment, induction and supervision

For roles involving regular, direct or otherwise significant contact with children, SASS will use a proportionate, documented suitability process before engagement. Depending on the role and applicable law, this may include identity and qualification checks, references, safeguarding questions and relevant criminal-record or other background checks. Checks do not replace supervision, training or ongoing attention to conduct.

People whose roles may bring them into contact with children must receive the policy, reporting routes and role-appropriate safeguarding briefing before starting the activity. SASS should record completion of required briefings and refresh guidance when risks or responsibilities change.

Standard 3 - Procedures: Risk prevention and safe activities

Risk assessment and activity design

Before an activity involving or affecting children begins, the responsible lead must consider safeguarding risks and document practical controls. The assessment should be revisited when the activity, participants, setting or risk changes.

Consider children's age and support needs (vulnerability); type and frequency of contact; power imbalance; supervision and one-to-one interaction; physical and online settings; travel and mobility; collection of personal data; photography and recording; involvement of partners; and how children can raise concerns.

Appropriate measures shall be introduced to minimise identified risks. Activities presenting unacceptable risks must not proceed until adequate safeguards are in place. If risks cannot be managed, the activity must be changed, postponed or cancelled.

Events, travel and supervision

For events, fieldwork, study visits and travel involving children, the activity lead should define who supervises, how children are checked in and out, emergency contacts, accessible arrangements, transport and accommodation controls, and how concerns can be raised. The plan should be explained to children in an appropriate format.

SASS must clarify responsibilities with schools, parents or guardians and partner organisations before the activity. No child should be left in the care of a person whose role and suitability have not been established.

Digital safety, photography and communication

Children's dignity and privacy shall be respected in all communication and dissemination activities.

The same safeguarding standards apply online as in person. Digital platforms used with children should be appropriate to the activity, access-controlled where feasible and moderated by a responsible adult. Avoid private one-to-one messaging and do not circulate harmful content.

Photographs, videos, recordings and personal stories involving identifiable children may be used only where there is an appropriate legal basis and, where required, informed consent. Explain the intended use, audience and channels; respect a child's choice not to participate in publicity; and avoid unnecessary identifying details or material that could expose a child to embarrassment, discrimination, exploitation or risk.

Staff and associates must not use personal devices to capture or store identifiable images of children unless specifically authorised and securely managed under an approved procedure. SASS shall avoid publishing unnecessary identifying information and shall ensure that children are represented respectfully and are not exposed to embarrassment, discrimination, exploitation or risk.

Implementation and reporting procedure

Who can raise a concern

Any person who witnesses, suspects or receives information about possible harm must report it without unnecessary delay. Children should be told, in an accessible and age-appropriate way, that they may raise a concern themselves and who they can contact in person, by secure email or through another accessible route. Internal contact details should appear in participant information and consent materials.

- **Child Safeguarding Focal Point at SASS:** Andrej Omulec, PhD, contact: andrej.omulec@fuds.si
- **Alternative reporting contact:** Lect. Emil Karajič, contact: emil.karajic@fuds.si

If a child faces immediate danger or needs urgent medical help, take reasonable steps to secure safety and contact emergency services (112) or the police (113). Do not delay emergency action while seeking internal approval.

Receiving a disclosure

1. Listen calmly, take the child seriously and thank them for telling you.
2. Reassure the child that they are not to blame. Do not promise secrecy or ask leading, investigative or repeated questions.
3. Ask only what is needed to understand immediate safety and who may be at risk. Do not confront the person alleged to have caused harm.
4. Explain that you will share information with people who can help keep them safe.
5. As soon as possible, make a factual record, using the child's own words where possible. Include the date, time, place, people present, observed facts and action taken; separate facts from opinion.
6. Report promptly to the Focal Point or alternative contact. If either route is unsafe or unavailable, contact the competent authority directly.

Assessment, referral and follow-up

The Focal Point assesses immediate safety, whether other children may be at risk, and the need for external referral. SASS staff must not investigate suspected abuse independently. The Focal Point coordinates protective steps and, where required or appropriate, referral to the competent Slovenian authorities, including the police, a social work centre or another competent child-protection service. Any legally required reporting duty must be followed by the person or institution on whom it rests.

A child and, where safe and appropriate, their parent or guardian should be told what will happen next. If someone else reported the concern, the Focal Point considers how to involve the affected child and caregiver safely. The reporter and, where appropriate, the child and caregiver should receive proportionate updates on the process and outcome, subject to privacy and legal limits.

Use the minimum necessary intervention: avoid asking a child to repeat a disclosure unnecessarily or handling a concern in a way that could cause further distress.

Confidentiality, records and protection from retaliation

Safeguarding information must be handled confidentially and shared only on a need-to-know basis or where disclosure is required by law. Records should be factual, securely stored separately from routine project files, accessible only to authorised people, and retained and deleted under applicable law and SASS retention rules.

Retaliation, intimidation or adverse treatment of a person who raises a concern in good faith is prohibited. An unsubstantiated concern is not, by itself, evidence of bad faith.

Partners and third parties

This Policy applies to all employees, members of management, students acting on behalf of SASS, researchers, volunteers, interns, consultants, contractors, visitors and other representatives involved in SASS activities. It also applies to partner organisations and other third parties involved in activities with children, in accordance with their agreed safeguarding responsibilities.

The Policy covers all children who participate in, are reached by, or may be affected by SASS activities, including research, teaching, training, events, travel, public communication and online activities.

Standard 4 - Accountability: Monitoring and review

SASS management is responsible for ensuring that this Policy is implemented across the institution and that safeguarding responsibilities are clearly assigned. The Focal Point coordinates its day-to-day implementation and provides guidance to staff, researchers, students and project managers whose activities involve children.

SASS monitors the implementation of this Policy through activity risk assessments, staff briefings and training, concern and incident records, response times, partner arrangements and lessons learned. Management reviews safeguarding information in a confidential and appropriately aggregated form, while ensuring that personal information is accessed only by those who need it for safeguarding purposes.

Where monitoring identifies a gap or a breach of this Policy, SASS assigns appropriate corrective action, identifies who is responsible for carrying it out, and follows up to confirm that the issue has been addressed. Depending on the circumstances, interim measures may be introduced to protect children while the matter is being addressed.

The Focal Point and project managers must ensure that relevant safeguarding requirements are included in activity planning, partner arrangements and risk management. Staff, students and other representatives must cooperate with monitoring and follow-up measures and report concerns in accordance with this Policy.

This Policy is reviewed at least every three years, and sooner following a significant safeguarding incident, a change in applicable law or relevant standards, or a material change in SASS activities. Management is responsible for ensuring that the review takes place and that any amendments are approved and communicated.

Annex 1: Child safeguarding code of conduct

When working with children on behalf of SASS, I will:

- respect the rights, dignity, views and privacy of every child;
- treat children fairly and without discrimination;
- maintain appropriate professional boundaries;
- use authorised communication channels and protect personal information and images;
- avoid behaviour or situations that could place a child at risk;
- report safeguarding concerns promptly and cooperate with appropriate procedures.

I will never physically, emotionally or sexually abuse or exploit a child; engage in sexually inappropriate behaviour; humiliate, threaten, intimidate or discriminate against a child; misuse children's images or personal information; or ignore or conceal a safeguarding concern.

Acknowledgement	**Details**
Name	
Role / project	
Signature and date	

Annex 2: Safeguarding concern record

Complete this record as soon as possible after reporting. Record facts and the child's own words where possible. Do not conduct an investigation. Send it only through the approved secure route to the Safeguarding Focal Point or alternative contact.

Field	Record
Date and time concern received or observed	
Name and safe contact of person reporting	
Child's name/age, if known	
Date, time and place of incident or disclosure	
People present or potentially affected	
What was seen or said (use exact words where possible)	
Immediate safety needs and action taken	
Who has been informed, when and how	
Referral or further action requested/agreed	
Other relevant factual information	

Secure handling: restrict access, avoid broad email circulation and do not store the record in a shared project folder. The Safeguarding Focal Point records receipt, risk assessment, decisions, referrals and follow-up separately.