

Child Protection Policy

of the Schwarzkopf-Foundation Young Europe

Version: 1.1

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PART 1: INTRODUCTION

1. Preamble

In our organisation, we work with young people between 16 and 28 years of age, but in some projects, even younger persons take part in our activities. A child is any person younger than 18 years of age. In Germany, where our foundation is located, we use a definition of children being persons below the age of 14 years and adolescents being persons older than 14 but below the age of 18 years. In this document, we refer to all individuals below the age of 18.

To benefit young people and children, while protecting their best interests and rights, is the core value of our work. All employees, volunteers, and partners (e.g. contractors, funding partners, network members, service providers, participants and guests in our events) of the Schwarzkopf-Foundation Young Europe (SFYE) are actively involved in promoting child safety. Basic principles of our child protection policy are related to the Mission Statement, Antidiscrimination Guideline, and specific guidelines within the different programme lines and projects. The child protection policy of the Schwarzkopf-Foundation Young Europe is based on German and European law, Convention on the Rights of the Child, Universal Declaration of Human Rights, and good practices from Germany and abroad.

2. About Schwarzkopf-Foundation Young Europe

We offer young people opportunities for encounters for their personal development and for active participation in civil society. In a wide range of projects, we work with them to promote an open, solidary, and democratic Europe and strengthen young and pluralistic voices throughout Europe and beyond.

The non-partisan Schwarzkopf Foundation Young Europe was founded in 1971 by Pauline Schwarzkopf. For five decades, the foundation has pursued the goal of promoting pan-European understanding, combating right-wing extremism, anti-Semitism, and racism, and strengthening young Europe. Through its networks,

the foundation is active in 40 countries across Europe. More than 30,000 young people, including 2,500 volunteers, participate in our events each year.

www.schwarzkopf-stiftung.de

3. The aim of our Child Protection Policy

This policy is introduced in addition to the existing regulations of projects and programmes within the Foundation with an ambition of creating a common ground to all the activities of the Foundation. The Child Protection Policy of the Schwarzkopf-Foundation Young Europe (SFYE) constitutes a framework of rules, standards and guidelines intended to:

- a) Make all employees and partners of the SFYE aware of the importance of taking action to protect children against abuse and developing a culture of work based on children's rights. Being familiar with the Child Protection Policy and implementing it in practice are professional obligations of all employees and partners of the SFYE.
- b) Ensure volunteering for and participating in SFYE activities offers a safer space for personal growth and development, where the safety, wellbeing, dignity, and respect of individuals is at the forefront. This means creating an environment where abusive behaviour, bullying, harassment, sexual harassment, or other inappropriate behaviours are not tolerated in any form.
- c) Define standard behaviour, clarify roles, and define the scope of responsibility of specific individuals for the safety of participants at our activities.
- d) Specify educational, preventive, and interventional activities aimed at keeping children safe.
- e) Establish procedures for reporting bullying and harassment, as well as the potential consequences to be incurred.

4. Policy applicability

The present policy is applicable to all events in SFYE, both on a national and international level, as well as the involvement of volunteers throughout SFYE activities. This includes, for example, one-time events and conferences, meetings, workshops, or any similar activities, as well as longer activities lasting more than one day, including regional, national, and international sessions, members or alumni gatherings, trainings, and all sorts of network activities. In some programmes and projects, additional regulations can be added to address specifics of the network and/or its activities, also in cooperation with the according partner.

5. Key principles underlying the policy

- a) The SFYE and every project team have a corporate duty and responsibility to care for and safeguard all those who take part in their activities.
- b) SFYE should be a safe and welcoming environment for everyone: wellbeing of every individual is at the forefront.
- c) The privacy of individuals involved in incidents is to be respected; information will only be disclosed on a 'need-to-know' basis and with consent of the affected (excl. criminally relevant incidents).
- d) Any complaint reaching SFYE will be dealt with seriously and confidentially; there are to be no repercussions for complainants.
- e) Sanctions are to be applied with an educational rather than retributive purpose. In case of serious matters, where legal action is needed, this is proceeded immediately.
- f) Failure to act by those responsible to do so will draw consequences, as will the submission of vexatious complaints.
- g) The Policy has been developed with the best interest of participants in mind and should be interpreted in the spirit of transparency and common sense.

6. Definitions

Regarding inappropriate behaviour and violations against Child Protection Policy, the following terms are being used:

“Abuse” - Abuse is defined as any action that intentionally harms or injures another person. A violation of a person's human and civil rights by another person or persons. It may take the form of physical, psychological, financial, or sexual abuse, neglect, or negligent treatment, or commercial or other exploitation that results in actual or potential harm to the health, survival, development or dignity of a child, youth, or vulnerable adult. Abuse can be a one-time or repeated act and can be unintentional or intentional. Abuse is often associated with criminal activity.

“Bullying” - Bullying is unwanted, recurring aggressiveness or behaviour aimed to, or resulting in, victimizing, humiliating, undermining, or threatening an individual or group of individuals; that causes psychological and/or physical harm. Bullying often involves a misuse or abuse of power/authority (whether real or perceived), where the target(s) can experience difficulties in defending themselves.

Different types of bullying:

- Physical: using physical force or aggression against another person (e.g. shoving, hitting, harsh finger pointing, invasion of personal space)
- Verbal: using words to verbally attack someone (e.g. name calling, teasing, insulting or offensive remarks, shouting, yelling, angry outbursts)
- Social/relational: trying to hurt someone through excluding them, spreading rumours or ignoring them (e.g. gossiping, playing harsh jokes),
- Cyber bullying: using electronic media to threaten, embarrass, intimidate, or exclude someone, or to damage their reputation (e.g. sending threatening text messages, publishing demeaning posts/photos of/about an individual)

- Work-related: isolating and undermining one's position/authority or purposefully making one's performance of work difficult or unbearable e.g. going around co-workers to avoid communicating with an individual; ignoring them when they walk by; purposefully giving unmanageable workloads and impossible deadlines; arbitrarily changing tasks; using evaluations to document alleged decreased/lower performance, contrary to facts, using threats, intimidation and pressure to influence the way an individual performs their job.

“Harassment” - Harassment is a form of discrimination that includes unwanted conduct which has the purpose or effect of violating a person's dignity, victimizing, humiliating, or undermining them, threatening or creating a hostile, degrading, or offensive environment for a person, based on their age, race (e.g. skin colour, facial features), ethnicity (e.g. culture, where or how they live, how they dress), religion (religious beliefs), gender, sexual orientation, family status (e.g. from a single parent family, adopted, non-biological gay or lesbian parents), marital status, physical or mental disability (e.g. mental illness, learning disability, use of a wheelchair). Harassment is similar to bullying because someone hurts another individual through cruel, offensive behaviours. Harassment is different in that it is a form of discrimination - treating someone differently or poorly based on certain characteristics or differences. Conduct can be through acts of verbal, nonverbal, or physical aggression, intimidation, or hostility, and is not restricted to any medium. It may consist of a single or repeated inappropriate behaviour.

Examples of harassment are (not exhaustive):

- Verbal harassment – jokes, comments, ridicule or songs;
- Written harassment – including text messages, emails, notices or comments;
- Abusive activity on social media;
- Physical harassment – jostling, shoving or any form of assault;
- Intimidatory harassment – gestures, posturing or threatening poses;
- Visual displays such as posters, emblems or badges;
- Isolation or exclusion from social activities;
- Racial harassment;
- Sexual harassment - unwelcome sexual advances / physical closeness or touching/ commentary about an individual's body or sexual activities / jokes or teasing of a sexual nature or based upon gender, perceived gender, or sex stereotypes, requests for sexual favours, any form of invasion of personal privacy

Neglect - the persistent neglect of a person's basic physical and/or psychological needs that may result in serious endangering of their health or development. Examples include failure to provide adequate food and shelter; failure to protect them from physical or psychological harm or danger; failure to provide adequate supervision (including the use of inappropriate caregivers); or failure to ensure access to appropriate medical care or treatment (in case it is needed). It may also include neglecting or failing to meet the basic emotional needs of a person.

“Sexual violence” - Sexual violence means any behaviour or act of a sexual nature, or perceived to be of a sexual nature, which is unwanted and takes place without consent or understanding of all persons involved. Sexual violence includes but is not limited to: rape; sexual assault, sexual activity without consent.

For the purpose of this policy, following terms regarding the structures and activities of SFYE are being used:

“Child” – A child (Kind) within the meaning of the German Youth Protection Act is a person who is not yet 14 years old; adolescents (Jugendliche) are persons who are 14 or older but not yet 18 years old. SFYE regards a child as anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country.

“Filing a complaint” - initiates the formal complaint procedure (as explained in Part III. INTERVENTION IN CASE OF SUSPECTED CHILD ABUSE), which can result in disciplinary measures for the perpetrator within the SFYE context. A person experiencing the harmful behaviour (victim) or any person observing such a behaviour can file a complaint to a SFYE officials.

“Officials” – Officials includes anyone attending an event in an official capacity of the SFYE.

“Participants” – includes everyone attending an SFYE event, besides guests and officials. For sessions that means delegates and teachers; for training events, trainees.

“Reporting” - means bringing one’s experience (witnessed or experienced directly) to the attention of the SFYE, especially to the awareness person (as explained in the Part III. INTERVENTION IN CASE OF SUSPECTED CHILD ABUSE), in an informal manner. Reporting can be done to seek intervention on behalf of the victim in order to have the harmful behaviour discontinued. It can also serve to e.g. ask about a possible course of action, possible applicable disciplinary measures, or to inform representatives of SFYE of a situation to allow them to be aware of potential needs for systemic action/reform in terms of organizational approaches. It does not oblige a victim to file a formal complaint.

“Vulnerable Person(s)” - for the purposes of this policy, this is an umbrella term that includes children, youth, and vulnerable adults.

“Vulnerable Adult” - a person 18 years of age or older who, because of disability, age, gender, social and economic status, illness, or environment, may not be able to care for him/herself or protect him/herself from abuse, harm, or exploitation.

Part II. PREVENTION AND RESPONSIBILITIES

1. Recruitment and introduction of new employees

The SFYE makes every effort to choose employees with appropriate skills and competencies, as well as sharing our belief in the values proposed by the Convention on the Rights of the Child, specifically the right to protection against abuse. In addition to the Child Protection Policy, the foundation is working with an Antidiscrimination Guideline and Recruitment Guideline which are binding for the work within the foundation.

Each prospective employee is to submit their resume and references within the application process. An interview is conducted by SFYE, focusing on candidates' knowledge and competencies, as well as explaining any existing gaps in employment/education. As early as the interview, the candidate is informed about the SFYE policies, including the Child Protection Policy. Each employee dealing with minors must submit a certificate of clean criminal record and goes through training regarding children's rights and data protection.

2. Education and research

Each employee is obliged to familiarize themselves with internal documents of the SFYE, including the Antidiscrimination Guideline and Child Protection Policy.

SFYE organises trainings, workshops, and other educational activities for its employees, at least once a year. Every new employee is obliged to take part in the next possible workshop after joining the SFYE team. Additionally, reading materials and other related activities can be provided to the team throughout the year.

The relevance SFYE'S Child Protection Policy will be reviewed every two years, and it will be updated if needed. This is a responsibility of SFYE management, where programme and project leads will be asked to assess the Policy and make proposals for its improvements.

3. Principles of our work

There is no place for bullying or harassment, in any form, in SFYE. Every employee, co-worker or volunteer acting as SFYE official has a duty to ensure everyone is treated equally and respectfully. Everyone is integral in creating a welcoming and safe environment for all. To create a culture where everyone understands their role in ensuring a safe and respectful environment for everyone, the first step is to ensure everyone is appropriately informed:

- The SFYE’s official, who has the main responsibility for the event or activity, is to communicate the Child Protection Policy to participants and officials prior to the event/activity.
- SFYE (and co-organising partners) is to provide support and a contact person for the participants dealing with any violations of the rules described in this policy, ensuring every event/activity has an awareness person who is the focal point for any questions, concerns or reports of behaviour that is against the present policy, or any other behaviour that is harmful or dangerous to participants or officials. The Event Awareness person should be an individual with relevant knowledge, a high level of empathy and sensitivity, experience in dealing with intense, stressful, or challenging situations, and a good track record of professionalism and respect of policies/rules in place.

4. Responsibilities

All individuals

All employees, volunteers, consultants, temporary workers, subcontractors, partner organizations and other people participating in SFYE activities including visitors are required to know and to follow this policy and to create an environment that prevents exploitation and abuse and that encourages the reporting of violations of this policy using the appropriate procedures.

Management Team / Programme Leads

Members of the management team and programme leads at all levels are responsible for ensuring that staff, volunteers, external coworkers, visitors, and partners are informed about the policy and supported in implementing and complying with the policy, and responsible for creating a leadership culture focused on protecting minors. They must ensure that they are responsive and act immediately when they become aware of safety concerns, and they must support employees or volunteers who make complaints about violations of this policy.

Organisers / SFYE officials

Organisers of SFYE events/activities (SFYE employees, co-organisers or volunteers acting as officials) are responsible for:

- ensuring participants feel at ease, respected with their boundaries, and not pushed out of their comfort zone without their consent
- maintaining and promoting a respectful attitude towards personal differences (cultural or otherwise)
- rejecting any form of discrimination and exclusion, as well as shaming, humiliation or degradation
- refraining from, discouraging, or intervening when observing pressure to engage in any type of physical or sexual activities with another individual. No participant should initiate or engage in any romantic, intimate, or sexual activity with another participant who: a. is under the legal age of consent and/or b. has not explicitly consented to engaging in the activity, and/or c. does not have the capacity to give consent (e.g.: intoxication by drugs or alcohol, any physical or mental condition)

that might cause confusion, mental health conditions) and/or d. does not have the freedom to consent (e.g. is coerced, pressured, forced, blackmailed or constrained when giving apparent consent).

- avoiding sexualised activities or activities with an increased potential for harassment or bullying (mocking, stereotyping, ...)
- creating an environment in which bullying or harassment of any kind are neither encouraged, nor tolerated.

While organizing events, SFYE officials are forbidden to engage in any romantic or intimate activity with another person, when they are in a position of trust in relation to that person (this would include officials in relation to participants (e.g. delegates, trainees), but also officials in a leadership position in relation to the officials where there is a hierarchical position and/or involvement in one's evaluation process.

Awareness Person

Designated Awareness Persons are responsible for handling reports or concerns about the safeguarding of vulnerable individuals appropriately and in accordance with the procedures that underpin this policy. Safeguarding Persons for events and activities of the SFYE are appointed by the SFYE management (officials responsible for the event/activity) prior to the event. Their responsibilities can differ slightly in relation to the specific activity, in general their role includes:

- Monitoring and recording safeguarding concerns
- Ensuring that they are referred to the appropriate authorities without delay
- Ensuring monitoring and record keeping procedures are implemented

5. Protection of image rights and personal information

SFYE protects image rights and personal information of children and generally people taking part in its activities. All materials are created with regards to the GDPR regulation.

Data protection

Ensure that personal data is kept confidential unless we have the consent of the data subject and/or their parent/guardian, or unless it is necessary to disclose such data to a specialized child protection or law enforcement agency in connection with a protection incident.

Social Media

SFYE has a policy regarding media and the use of names, images, including photographs and recordings (the "Social Media Policy"). This should be applied in all situations. Specifically with regard to the protection of children, young people and vulnerable adults, we will:

- Use names and images of children, young people or vulnerable adults that are respectful and do not expose them to further risk (no degrading or sexual images of children who are naked or partially clothed).
- Publish images and names of children only if we have written permission from the parent/guardian given in a consent form.
- Reproduce images and names of young people and vulnerable adults only if we have their written consent or that of their parent/guardian, whichever is most appropriate.
- Make it clear to vulnerable individuals and their families that consent to provide information or images is not a condition of participation in SFYE's activities and programmes.

Part III. INTERVENTION IN CASE OF SUSPECTED CHILD ABUSE

All employees and partners of the SFYE act for the purpose of protecting children against abuse and inappropriate actions. In our work we comply with the German legal regulations, when working abroad, local legal regulations are taken into account. Every suspected case of child abuse is treated seriously and investigated, whether reported by a child, an SFYE employee, or official or any participant of SFYE events.

Every individual should immediately intervene to stop an inappropriate behaviour when observed (be it bullying or harassment). In case of any violation of this policy, a person taking part in SFYE activities can address his/hers concern to any SFYE official, preferably to a person who is appointed as an Awareness person for the event.

A person experiencing the harmful behaviour (victim) or anyone observing such a behaviour can file a complaint to the SFYE officials. The responsible person (SF official) during an event is clearly named and communicated accordingly and can be identified in the space and approached throughout the whole event. If possible, the complaint should be conducted in a written form. The SFYE official is obliged to accept the complaint, complete the information if needed and to inform the management of the Foundation. In addition, complaints can always also be addressed to the managing directors (directors@schwarzkopf-stiftung.de)

If the child's health or life are in imminent danger, an SFYE official learning of the situation intervenes without delay, by immediately informing a Police unit (or law enforcement agency) by phone about direct threat or damage to health and life of a child. All activities undertaken in the course of the intervention must be documented.

To ensure that all such situations are managed appropriately and effectively:

- Decisions and reports must be made and actions taken.
- SFYE is not an investigative authority. It is important that the appropriate law enforcement agency is engaged to ensure that the person at risk is adequately protected and supported and that all evidence is collected in accordance with the law.
- All sensitive and personal information must be kept confidential (including the names of individuals reporting abuse) and shared only on a need-to-know basis, i.e., access must be necessary for the performance of official duties.
- If an SFYE employee is the subject of an investigation, the managing director(s) is/are responsible for conducting a thorough investigation.

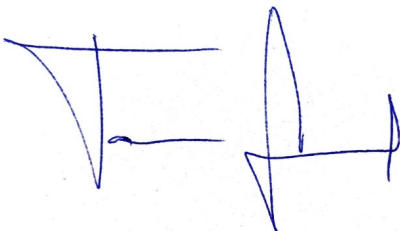
Part IV. POLICY IMPLEMENTATION AND MONITORING

Child Protection Policy of the Schwarzkopf-Foundation Young Europe comes into force at the moment of its full version being published and made available by the SFYE to all employees/partners of the Foundation and at the moment of its abridged version being posted on the SFYE website.

The SFYE management is responsible for implementation and execution of Child Protection Policy, whose duties include among others:

- coordinating introductory training sessions and refresher courses for employees;
- performing a survey once every 2 years within the Management Team / Programme Leads to investigate the efficacy and appropriateness of Policy stipulations, and to evaluate how familiar SFYE employees and collaborators are with the Policy;
- consulting with SFYE employees and partners.

In Berlin, 20 October 2023



Tomas Sacher, Executive Director