



civil kollégium alapítvány

 [www.cka.hu](http://www.cka.hu)

 [facebook.com/civilkollegium](https://facebook.com/civilkollegium)

 +36 1 788 36 32

 6090 Kunszentmiklós, Kunbábony 37/2

 1071 Budapest, Damjanich u. 52. IV/1.

 Tax: 18070008-1-03

## **Safeguarding policy and procedures protecting children and vulnerable groups**

**2019**

<b>Contents</b>	
1. Purpose of the Policy	4
2. Main Activities and Operations of CKA	4
3. Target Groups, Definitions	4
4. Establishment of Committees of Inquiry for the Purpose of the Investigation of Cases	7
5. Management of Notifications and Complaint Mechanisms.	7
5.1. <i>Notification Procedures</i>	8
5.2 <i>Anonymous Reporting</i>	8
5.3 Complaints Register	9
5.4 Protection of Personality Rights	9
5.5 Management of Cases Falling Within the Competence of the Child Protection Notification System	9
6. Proceedings Subsequent to Notification	10
6.1 A Preliminary Evaluation of Notification	10
6.2 Safeguarding notifiers	10
6.3 Management of high priority cases and cases requiring particular attention	10
7. Investigation	10
7.1 Action Plan	11
7.2 Information of the Notifier	11
7.3 Appeal Against Decisions and Measures	11
7.4 Summary Report	11
8. Conduct Regulations	11
9. Management of Media and Publicity	12
10. Recommendations for Community Organization Groups	12
11. Appendices	15
Appendix 1: Complaint Form	15
Appendix 2: Committee situation assessment form	17
Appendix 3: Action Plan	18
Appendix 4: Case Closure Form	19
Appendix 5: Photo and video consent agreement:	20



Appendix 6.A.: DECLARATION OF COMPLIANCE for Workers, Volunteers, Supported Individuals	21
Appendix 6.B.: DECLARATION OF COMPLIANCE FOR SUPPORTED ORGANIZATIONS	22
Appendix 7: Conduct Regulations	23
Appendix 8 – Complaint Flow Chart	24



## 1. Purpose of Policy

The Civil College Foundation (in Hungarian: Civil Kollégium Alapítvány, hereinafter CKA) is committed to preventing and addressing abuse and any issue associated therewith. The present document aims to provide procedures for the notification and management of any conflict or offense that may arise in connection with vulnerable social groups and for acting against any form of violence or abuse, as well as to provide guidance for the cases above for community organizers, employees and groups supported by CKA. This document is applicable to persons who perform work for CKA as employees, under agency contract with CKA or as activists or volunteers.

## 2. Main Activities and Operations of CKA

CKA is an established player in civil society development, and since 1994, it has been continuously developing its civil society training materials and providing this knowledge for free or at a reduced price for citizens or professionals working on the development of disadvantaged local communities. CKA has been working towards spreading the professional approach of 'community organizing' in Hungary since 2010 and, as a result, works with 15-25 community organizers across the country.

## 3. Target Groups, Definitions

### Vulnerable groups

The European Commission describes vulnerable groups as groups whose members (including children) experience a higher risk of poverty and social exclusion than the general population. The UN defines children as "every human being below the age of 18 years unless, under the law applicable to the child, majority is attained earlier".

CKA works with the following target groups that could be possible victims of physical, sexual, psychological and emotional or cyber abuse (either by individuals or groups of people):

- community organizers
- activists
- volunteers
- members of vulnerable groups
- children under 18 years (CKA is primarily concerned with persons over 18 years in its adult education and community organization programmes. The presence of persons under 18 years is possible on the sole condition that adult supervision is provided. See page 10.)

<b>Community organizer</b>	<b>A person who performs community organization activities supported by CKA</b>
<b>Activist</b>	<b>Members or activists of community organization groups cooperating with community organizers supported by CKA</b>
<b>Volunteer</b>	<b>Persons taking part in CKA activities under volunteer contract with CKA.</b>
<b>Vulnerable group</b>	<b>Persons associated with CKA through community organizers, to whose interest a community organizer supported by CKA works for, and who are potentially discriminated against due to their financial status, ethnicity, sex, sexual orientation or age, or who are at a risk of being subjected to violence in their current living situations (relationship, community, school, workplace).</b> Involvement of children in community activities takes place indirectly, during community organization work through their parents, elder siblings or teachers.

European Commission (2010): The European Social Fund and Social Inclusion

[http://ec.europa.eu/employment\\_social/esf/docs/sf\\_social\\_inclusion\\_en.pdf](http://ec.europa.eu/employment_social/esf/docs/sf_social_inclusion_en.pdf)

United Nations Conventions on the Rights of the Child <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx>

Act LXIV of 1991 on the publication of the New York Convention on the Right of the Child

[https://net.jogtar.hu/jr/gen/hjegy\\_doc.cgi?docid=99100064.TV](https://net.jogtar.hu/jr/gen/hjegy_doc.cgi?docid=99100064.TV) – available in Hungarian



--	--

The groups organized by CKA community organizers represent various vulnerable social groups, including disadvantaged people, people of Roma origin, LGBTQI people, women, young adults, and, indirectly, children. Very often, community organizers, activists and volunteers themselves come from vulnerable social groups.

Harm and conflicts may occur:

- a) within CKA, between volunteers, activists or workers,
- b) outside CKA, at the expense of activists or volunteers due to their work at CKA,
- c) within community organization groups, between members,
- d) apart from these, organizers and mentors may become aware of conflicts or violence within other communities or families through their community work.

The child protection law obliges everyone who becomes aware of child abuse - whether it happened at home, at school or inside the community - to report it to the authorities whether or not it took place during their work.

The present policy has an obligatory effect in cases specified in points a) and b), and, as a part of this document, puts forwards recommendations for handling issues that can arise in community organization groups.

During its trainings, CKA explains its own regulations to groups and helps them develop their own internal regulations. If needed, CKA provides additional help by means of involving mediators or other professionals. However, if community organization groups are harmed in connection with their work related to CKA, the issues are to be dealt with according to the present CKA regulations.

### **Forms of harm and abuse**

**Harm** is caused when someone hurts or offends people of vulnerable groups, or does not prevent these behaviours or actions from happening.

**Violence:** physical, psychological (psychosocial) or sexual abuse, negligent treatment or exploitation that is perpetrated in the form of direct or indirect actions or failure to act, that results in potential or actual harm to the child's dignity, physical, mental or social integrity or development<sup>2</sup>.

**Discrimination:** Bias or prejudice against a particular person.

**Cyber abuse:** Cyber abuse is a form of offensive, aggressive behaviour that uses technology to humiliate, intimidate, inflict harm on purpose to, scare, threaten, make fun of, ostracize, embarrass or plant damaging impression of someone.

**Harassment:** According to section 222 of the Hungarian Criminal Code any person who pesters someone on a regular basis to intimidate them or to disturb their privacy arbitrarily, commits the act of harassment.

**Cyber harassment:** The regular and long-lasting form of cyber abuse. Cyber harassment is perpetrated when someone is subjected to regular and long-standing harm, intending to humiliate, threaten, make fun of, ostracize, embarrass or plant damaging impression of another person. For more details, visit the website of the Kék Vonal Child Crisis Foundation. (<https://www.kek-vonal.hu/index.php/hu/szolgalatasok/internetbiztonsag/395-internetes-zaklatas>)

### **Child abuse:**

**Child sexual abuse:** contact or interaction between a child and another, "better informed" or older child or an adult known or not known to the child (a stranger, sibling, representative of authorities, parent or caregiver) in which the child is used for the sexual stimulation of an older child or adult. The

contact or interaction of this nature is achieved by means of violence, fraud, bribery, threatening or other forms pressure.[...]

**Commercial sexual exploitation of children:** consists of humiliating, degrading and often life-threatening practices against children. It takes three main, interconnected forms: prostitution, pornography and the trafficking of children for sexual purposes. Other forms include child sex tourism, child marriage and forced marriage.<sup>3</sup>

**Mental, emotional abuse:** constant emotional maltreatment that has a grave, permanent impact on the emotional development of the child. The child may have the impression that they are worthless, unaccepted, unwanted and unloved. It may involve setting developmentally- or age inappropriate expectations for the child. It includes causing constant fear or distress in the child, humiliation, constant criticism, emotional blackmail, and constantly taking advantage of the child. These forms of emotional abuse mentioned above may all be present simultaneously or occur separately.<sup>4</sup>

**Neglect:** An ongoing failure to meet the child's basic physical and emotional needs, which possibly harms the child's physical or cognitive development.

**Physical abuse** includes slapping and punching, shaking, throwing, burning, suffocating or causing a traffic accident that inflicts physical harm upon the child. It may also take the action by parents or caregivers to say untrue things about the child's health condition or purposefully cause their illness.

The extension of the above forms of abuse to other vulnerable social groups:

**Physical abuse:** Use of physical force that causes actual or potential injury or suffering (e.g. punching and slapping, shaking, burning, genital mutilation or torture).

**Emotional abuse:** all kinds of humiliating or degrading treatment, such as name-calling, constant criticism, condescension, constant shaming, detention or social isolation.

**Neglect and negligence:** deficit in meeting another's basic physical and psychological needs, such as the failure to provide adequate food, clothing or shelter. It furthermore includes the failure to prevent harm, to provide inadequate supervision or denying adequate health care for another person.

**Sexual abuse:** all kinds of sexual violence including incest, premature or forced marriage, rape, involvement in pornography and sexual slavery.

**Sexual exploitation:** Actual or attempted abuse of power, confidence or a position of vulnerability for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another person. When the subject is unable to give consent due to young age, it also constitutes sexual exploitation and is a criminal offence.

**Economic abuse and exploitation:** Unfair agreement that gives undue economic or other advantage to another person or forces them to accept unfavourable terms. It may involve influencing another person's economic decision-making in order to gain undue advantage, or discriminates between parties of transactions of equal nature or value. It may take the form of the excessive exploitation of another's person resources or the expropriation thereof without proper compensation. Upon determining the degree of exploitation we employ the Marxian formula, according to which the degree of exploitation can be calculated from the rate of surplus-value ( $m/v$ ) that means the amount of surplus labour divided by necessary labour.

---

3 ECPAT Thailand (2001): Questions and Answers about the Commercial Sexual Exploitation of Children

4 Módszertani Gyermekjóléti Szolgálatok Országos Egyesülete (National Association of Methodology Child Welfare Services) (2006): Kézikönyv a gyermekjóléti szolgáltatást nyújtók számára a gyermekekkel szembeni rossz bánásmóddal kapcsolatos esetek ellátáshoz és kezeléséhez (Handbook for the Management of Incidents Regarding Child Maltreatment for Providers of Child Welfare Services), available in Hungarian at: [http://www.nefmi.gov.hu/letolt/kozokt/bantalmazas\\_kezikonyv\\_080409.pdf](http://www.nefmi.gov.hu/letolt/kozokt/bantalmazas_kezikonyv_080409.pdf)



#### **4. Establishment of Committees of Inquiry for the Purpose of the Investigation of Cases**

CKA is committed to investigating and addressing the instances of mental or physical abuse, sexual violence, harassment or cyber harassment, or conflicts associated with any kind of abuse that occur within the organization, and ensures a platform for making complaints.

CKA establishes a committee of inquiry (hereinafter: Committee) for the purpose of investigating complaints. The committee comprises three persons. Its members are: community organization professional-in-charge, community organization mentor and a member of the Management Board.

##### **Functions of Committee**

- Representation and spreading of the principles of the safeguarding policy

- Examination of received notifications, analysis of possible actions and legal consequences.

- Initiation of legal proceedings.

- Recording and management of complaints in a database.

Members of the Committee are appointed by the Management Board. The Committee provides an annual report on the received complaints and their handling. The chairperson of the Committee is elected by members of the Committee.

##### **The chairperson of the Committee is responsible for:**

- Convening the Committee;

- Conducting the meetings of the Committee

- Information of the Management Board

#### **5. Management of Notifications and Complaint Mechanisms.**

If an employee, volunteer, activist or community organizer within CKA, or a child, juvenile person and member of vulnerable social groups taking part in the work of CKA is subjected to any form of harm, infringement of rights or abuse, they can report the occurrence **directly or indirectly** (see complaint flow chart) to the chairperson or members of the Committee. CKA is under an obligation to examine the background of the complaint and handles the case as laid down in its regulations, and, where justified, forwards it to the competent authorities.

Employees, volunteers, activists and member organizations taking part in the work of CKA must be informed of the possibility and procedures of making a complaint. Community organizers, activists and volunteers are assisted by mentors, who provide information on the possibilities of making a complaint as established by the policy. Community organizers, activists and volunteers may notify their mentors when they consider themselves harmed. The mentor shall draw up minutes of the received notifications and report the case to the professional in-charge within 24 hours (see the minute-book in Appendix 1), who forwards the notification to the Committee for examination. In case the mentor is also the professional-in-charge, the notification and the minute-book are to be forwarded directly to the chairperson of the Committee. Community organizers shall inform the community organization groups that cooperate with them of the possibilities of making a complaint. Community groups may indicate their harm that resulted from the cooperation with CKA to the community organizers. Community organizer shall draw up minutes of the received complaints and report the case to the Committee within 48 hours (see minute-book in Appendix 1). In case the harm is caused by a community organizer, the aggrieved party may report the incident to the mentor, professional-in-charge or directly to the members of the Management Board.

If any person working for CKA becomes aware of an incident in which any person within CKA was subjected to infringement of rights or abuse, they shall report the case to a member of the Management Board within 24 hours, who draws up minutes of the incident. (see Appendix 1). The member of the Management Board proceeds as described before and forwards the notification to the Committee for investigation (see complaint flow chart in Appendix 8).

### **5.1. Notification Procedures**

1 The person involved directly informs the Committee orally in person or by phone, or by email (this is a main email address that means the notification is forwarded simultaneously by a helper to all three members of the Committee – the chairperson being responsible for deciding on the possible convening of the Committee). This situation may occur when the suspected abuser is a community organizer, mentor or trainer. Notifications made orally in person or by phone are also recorded in a written form.

2 The person involved informs the community organizer – the community organizer consults the locally responsible authorities (e.g. family assistant office, police) and keeps records of the incident for the Committee. The community organizers report on the case and how it was resolved, for the purpose of drawing the possible lessons.

3 If it is more convenient for the group, it is advised to appoint a mandate; a person who is responsible for incidents of this kind, and to whom members can turn to. It is a practical solution if we see that the members of group prefer sharing information with their peers (contemporaries, people of the same sex or ethnicity).

4 The community organizer turns to the mentor or the Committee- especially to the Committee if the case requires an immediate solution.

5 The mentor takes note of the problem – turns directly to the Committee (if the case involves CKA workers or clients). If the mentor identifies the problem *within the local community*, it shall be reported to the local community organizer initially, afterwards acting in accordance with procedures 1 or 2.

Getting to know those who play a defining role in the life of the community, keeping touch and cooperation with them as far as is possible is an important part of community organization. They may be actors of local social or family assistance services, professionals doing civil or church social work, doctors, teachers, church leaders or other influential members of the local community life. It may prove beneficial to turn to these actors in case of conflict, if we think the persons involved may benefit from it and get more help. In special cases the involvement of non-local professionals (psychologists, lawyers, mediators) may be reasonable in order to solve the problem. The safety of the complainant or the person involved shall be a primary concern

It is essential to have a written record of all notifications (keeping private details safe), and that Committee should monitor the development of the case even if not involved in finding a solution.

### **5.2 Anonymous Reporting**

CKA ensures the possibility of anonymous reporting by providing an email or postal address, or a message box in the Budapest office. Anonymous reports are to be taken as seriously as any other notifications.

Notifiers may apply for anonymity regardless of the reporting channel they use. If the notifier desires to remain anonymous, the Committee will do its utmost to protect the identifier's identity.

### **5.3 Complaints Register**

Every complaint must be registered and tracked in a database specifically designed for this purpose. Database management is the responsibility of a member of the Committee appointed to this duty.

### **5.4 Privacy Policy**

All the information regarding every notification, the victims, suspected perpetrators or the witnesses must be kept confidential to which only the members of the Committee shall have authorized access. The protection of data is a top priority (safe filing cabinets, password-protected documents, etc.) including when forwarding information orally or electronically (in emails or on portable storage devices).



### **5.5 Management of Cases Falling Within the Competence of the Child Protection Notification System**

Child protection and the functioning of the child protection notification system is regulated under Act XXXI of 1997 as amended by Act XCV of 2017 on 12<sup>th</sup> July, 2017 (Child Protection Act, hereinafter CPA)<sup>5</sup>.

---

<sup>5</sup> Texts available in Hungarian at <https://net.jogtar.hu/jogszabaly?docid=99700031.tv>  
and <https://net.jogtar.hu/jogszabaly?docid=A1700095.TV&timeshift=20170901&txtreferer=99700031.TV>



Under this act all operators of the child protection notification system have reporting obligations upon the occurrence of child abuse. We believe that in the spirit of the UN Convention on the Right of the Child every adult citizen is responsible for the protection of children, therefore they also have reporting requirements. The CPA imposes clear obligations on operators of the child notification system. It lays down that if operators of the child notification system take possession of any information that imply child exposure in the course of their child protection activity, they have reporting requirements to competent family and child welfare services without discretion, and shall take the initiative for authority proceedings without delay in case there is an imminent danger to the physical integrity of the child.

#### Operators of Child protection notification system

In section 2 (1) the CPA specifies the local governments, guardianship offices, courts, police, prosecutor's offices and probation offices. Section 17 (1) of the CPA specifies the following operators: 1) health care providers, that is health visitor services, pediatricians, general practitioners b) providers of individual care, such as family assistance offices, family assistance centres c) institutions of public education d) police e) prosecutor's office f) courts g) probation offices h) organizations providing mitigation and victim support services i) refugee reception stations, temporary refugee shelters j) associations, foundations and church legal persons k) employment authorities. According to section 17 (3) of the CPA the aforementioned persons, bodies, etc. shall have the duty of mutual information and cooperation.<sup>6</sup>

**As CKA primarily deals with the education of adults and support of organizations including adults, our workers, volunteers and supported community organizers are obliged to work with persons under 18 years on the sole condition if adequate supervision is provided by parents, adult relatives, guardians or social workers authorized by parents.**

In the light of the above and after an evaluation of our community work, the following options for notification are available for the workers, supported community organizers and volunteers of CKA:

They may directly notify an operator of the child notification system, who is under the obligation of forwarding the notification to the child welfare office. In our case the possible persons concerned are family carers, health visitors, local teachers or an employee of the guardianship office.

They may report the case indirectly within the framework of the child protection notification system, cooperating with the local partner organization. In our case they are NGOs doing community work, for example organizations providing out-of-school education or cultural activities, or social workers at non-profit or church associations. In cooperation with the aforementioned persons community organizers or a co-worker of theirs notifies an operator of the child protection notification system and follows up the subsequent measures consulting with the professional partner on a regular basis.

In case of more serious cases they shall call the child protection or the police.

**Child protection hotline number: 06 80 21 20 21; <https://szgyf.gov.hu/1747-gyermekvedo-hivoszam>**

In case there is a suspicion of child abuse it is obligatory to report it to the child protection authorities *within 8 days*. In more serious cases (physical abuse, sexual abuse or harassment involving dangerous threatening) the report is to be made within 72 hours.

---

6. A gyermekvédelmi észlelő- és jelzőrendszer működtetése kapcsán a gyermek bántalmazásnak felismerésére és megszüntetésére irányuló szektorsemleges egységes elvek és módszertan. (Sector neutral uniform principles and methodology of the identification and prevention of child abuse in connection with the operation of child protection detection and notification systems) EMMI (Ministry of Human Resources) 01.01.2018. – Balog Zoltán  
Text available in Hungarian at <https://kk.gov.hu/download/e/60/c0000/A%20gyermek%20b%3%A1ntalmaz%C3%A1s%C3%A1nak%20felismer%C3%A9s%C3%A9re%20%C3%A9s%20megsz%C3%BCntet%C3%A9s%C3%A9re%20ir%C3%A1nyul%C3%B3%20egys%C3%A9ges%20elvek%20%C3%A9s%20m%C3%B3dszertan.pdf>



Besides notifying the operators of the child notification system, our employees, volunteers or community organizers send a written report to the members of the committee within the organization, who - adhering to privacy regulations – document the case for personal use, monitor the outcome, and, if necessary, discuss it on community level involving professionals.

## **6. Proceedings Subsequent to Notification**

### **6.1 A Preliminary Evaluation of Notification**

Upon the reception of the notification, in deciding on next steps the Committee shall examine if:

- the notifier in imminent danger
- it qualifies as a high priority case
- the case needs to be investigated by a person other than the appointed member of committee due to a conflict of interests.

The preliminary evaluation shall be carried out within 24-48 hours from the time of notification. The purpose of preliminary evaluation is to establish whether an incident occurred or not, but to decide on the following steps.

**The case qualifies as “high priority” if any one of the four criteria is met.**

There is a suspicion of physical, sexual or child abuse.

In case of offences leading to the severe impairment of health, attempted suicide or death of a member of a community organization group, a worker, community organizer, volunteer or activist at CKA.

There is an increased interest in the case by the public, media, CKA supporters or the government.

There has already been a previous complaint against the perpetrator.

**Conflict of interests** is constituted if the notification concerns one of the members of the Committee. The management Board suspends the participation of the concerned member of the Committee in the case and appoints another member.

### **6.2 Safeguarding notifiers**

If the safety of the notifier could be at risk according to the preliminary evaluation, the Committee shall take immediate measures in order to prevent those threats. Therefore, the alleged perpetrator can be suspended or excluded from the programme until the notification is investigated or immediately reported to the police.

### **6.3 Management of high priority cases and cases requiring particular attention**

In the cases of high priority cases and cases requiring particular attention the Committee may proceed with the involvement of other experts in order to protect the interests of the victims (such as psychologists or legal experts). If any of the aforementioned persons is the suspected perpetrator, it results in the exclusion of that person from the evaluation of the case.

## **7. Investigation**

The Committee re-examines all the information at its disposal and gathers further information when necessary. In the course of the evaluation and decision-making the Committee proceeds as follows and considers the following:

Information of the complainant of case management procedures, hearing of the complainant.

The identification of additional witnesses to be heard.

The possibility of resolving the case within the organization by means of conflict management or mediation.

If it is necessary to report the case to the police.

If it is necessary to report the case to further authorities (e.g. guardianship office).

If it is necessary to petition the Equal Treatment Authority (EBH).

If it is necessary to involve further experts in the investigation (legal, communication experts, mediators, etc.)

Identification of further persons to be informed (in case the harm was sustained to a child).

If there is a need for internal investigation.

In the course of the evaluation the Committee uses the form included in Appendix 2.

### **7.1 Action Plan**

Based on a comprehensive evaluation of the case an action plan is developed setting time frames and specifying persons responsible (sample included in Appendix 3). All proceedings, results and decisions are to be documented. The action plan must be approved by the chairperson of the Committee.

### **7.2 Information of the Notifier**

Upon the conclusion of a case, the Committee provides a summary of the results and the measures taken. The summary should not infringe the personal rights of either parties.

### **7.3 Appeal Against Decisions and Measures**

Notifiers may appeal against the consequences of the investigation when not satisfied with the management of the case. Their appeal is forwarded to the Committee by the competent employee within 48 hours from the time of appeal. The case will be investigated further by the Committee, and, if necessary, another investigation will be conducted on the basis thereof.

### **7.4 Summary Report**

Following the conclusion of the case the Committee draws up a summary report (Summary report form included in Appendix 4).

## **8. Conduct Regulations**

Activists and volunteers participate in CKA's activities under contract that includes a declaration of compliance to the conduct regulations specified in the policy. The conduct regulations contain the norms of behaviour and regulations they should adhere to during the course of their work.

The regulations are the following:

We treat every human being equally, without prejudice. It is not permitted to make offensive comments on the origin, ethnic background or sexual orientation of one another. During our work, no-one should be discriminated against due to their origin, religion, ethnic background or sexual orientation.

Mutual respect is the basic condition of cooperating as a group. The verbal abuse and humiliation of one another is not tolerated.

No form of physical aggression is tolerated.

Physical, verbal or sexual abuse, as well as cyber abuse against the participants of our activities qualify as breaches of ethics, and are investigated at all times. When there is evidence for any kind of abuse the contract of the workers or volunteers concerned will be terminated and the necessary legal actions will be taken if necessary. In the event that workers, volunteers, activists or community organizers supported by CKA violate the conduct regulations, CKA may suspend their participation from CKA's activities on the basis of the decision of the Committee.

Supported community organizers, activists and volunteers are informed of the above regulations by their mentors by participating in orientation activities that help prevent the potential conflicts between members of vulnerable target groups. In the event that a conflict arises among members of the group, the professional-in-charge of CKA may initiate a peer mediation assembly. Involvement of external mediator experts may take place if the professional-in-charge considers it necessary. CKA is committed to fully cooperating with the competent authorities (e.g. the police) in case there is a suspicion that persons operating on behalf of CKA, children or other members of vulnerable groups may be subjected to any kind of abuse. A simplified summary of CONDUCT REGULATIONS is included in Appendix 7, that is attached to the declaration of compliance with safeguarding policy (to be found in Appendix 6).

## **9. Management of Media and Publicity**

### **Management of publicity in connection with vulnerable groups**

Taking photographs or making audio and video recordings of members belonging to vulnerable groups require the prior oral consent of the persons concerned.

Upon requesting consent, the persons concerned should be informed about the context, purpose and manner of the use of the recordings and photographs, as well as how long those can be used.



In case of persons under 18 years a written consent by the parent or caregiver is required. The parent or caregiver and the child should be informed at all times about the context, purpose and manner of the use of the recordings or photographs.

We ensure that third parties do not come into possession of the photographs and recordings. The organizers must ascertain that the making, disclosure and possessions of recordings and photographs do not put the persons concerned and their families at risk.

The disclosure of photographs or video recordings that depict children without clothes on or wearing unsuitable clothing, in a way that is humiliating or may infringe personality rights, is not allowed even with consent.

Consent is required in cases of:

- videotaping
- photographing
- voice recording

Consent is required on the following premises.

- trainings
- workgroup meetings
- any internal events of CKA

At public events (e.g. demonstrations, other events) a declaration of consent is not necessary.

#### **Management of cases under investigation in case of vulnerable social groups:**

If a case under investigation might potentially attract increased media attention, the chairperson of the Committee appoints a person to be in charge of handling communication issues.

CKA develops a crisis communication plan.

In case of crisis communication, it is necessary to compile an updated list of media outlets that can be directly and immediately contacted by CKA.

In case of crisis communication, it is necessary to appoint a worker or member of the Management Board who will be authorized to make comments on the case.

Protection of personal right is a primary concern in internal or external communication.

The declaration of consent form necessary for photographing, voice recording and videotaping is included in Appendix 5.

#### **10. Recommendations for Community Organization Groups**

The present document provides recommendations for the community organization groups cooperating with the community organizer supported by CKA in order that they could develop their own safeguarding policy and procedures protecting vulnerable social groups. As they represent various groups performing various activities, some parts of the recommendations may not be applicable to every organization.

Upon the development of a safeguarding policy, it is necessary to consider the following:

- The main activity of the group/organization and how vulnerable groups are involved.
- Potential harms and infringements of rights that may affect vulnerable social groups within the group/organization and regarding their participation in the activity of the group/organization.
- Potential internal conflicts between workers belonging to vulnerable social groups.
- Identification of available human recourses necessary for the investigation and handling of harms and conflicts.

The following questions may be of assistance in determining the criteria along which it is advisable to develop an organization's safeguarding policy and procedures protecting vulnerable groups, as well as in the identification of the necessary measures:

#### **1) Does a regulated process exist for members of vulnerable groups to make complaints about a harm they have sustained within the organization?**

Yes

No → Development of a system for making complaints is necessary.

- Who can the complainant turn to?

- Is there a possibility for anonymous notification?
- Complaints are recorded in what form (standard form, database, etc.)?

**2) Is there a standard procedure for the investigation of complaints?**

Yes

No → It is advisable to set up a task force of two or more persons for the purpose of investigating complaints.

- A person who is responsible for the investigation should not be a person concerned in the case.
- It is necessary to draw up minutes of task force meetings.
- Documentation of details is necessary throughout the whole case.
- The complainant shall be informed after the conclusion of the case.
- It is necessary to determine a specific time frame within which the investigation is commenced from the reception of the complaint.

**3) Is the investigation of the case beyond the competence of the organization?**

No.

Yes. →

Is there a need for involvement of external professional assistance in the investigation? (social workers, legal experts, mediators)

- Is it necessary to notify the authorities about the case (police, guardianship office, etc.)?

**4) Proceedings subsequent to the investigation**

In the course of the investigation the task force investigating the case shall determine the necessary proceedings.

Furthermore, it is necessary to appoint a person who is responsible for the execution of the subsequent procedures as well as setting a time frame thereof.

**5) Which persons should have access to sensitive data and the details of the case?**

During the processing of personal data and information personal rights should be respected. Requests for anonymity should be respected.

In the course of the investigation it is necessary to determine which persons should have access to information in connection with the case.

During the storage and when furnishing information, it is essential to pay a special attention to personality rights, unauthorized persons should not become in possession of the materials. (password-protected files, documents to be stored in safety deposit boxes, locker cabinets, etc.)

**6) Are the members of vulnerable groups aware of their rights to make a complaint?**

Yes

No→

- It must be ensured that the persons concerned should be informed orally and in written form of the possibilities of making a complaint in a way it should be easily understandable and enable them to take the necessary steps at the occurrence of any kind of abuse (let's see an example).

**7) Does the group/organization use publicity or the media, do vulnerable groups become visible to the public? Can it have a negative impact on the target group?**

No

Yes→

- If the group/organization intends to take photographs or make audio or video recordings of vulnerable groups for a public use (social media, website, television, leaflets, posters, etc.) it is necessary to ask for a written consent from the persons concerned. The declaration of consent must contain information on where, for what purpose and for how long the recordings and photographs will be used by the group/organization.
- In case the persons in the recordings or photographs insist that those should be subsequently taken down, the group/organization shall comply with the request.

○ In public events (e.g. demonstrations) a declaration of consent is not necessary.  
In case of persons under 18 years a declaration of consent by parents or caregivers is required to take photographs or make audio or video recordings.



## 11. Appendices

### Appendix 1: Complaint Form

To be filled by mentors or members of the Management Board based on the information received from the complainant.

<b>Notifier (Mentor or Member of Management Board) - personal details:</b>	
Name: _____	Sex: <input type="checkbox"/> Male <input type="checkbox"/> Female
Address: _____	
Phone: _____	
Mobile: _____	
Fax: _____	
E-mail: _____	
Position or relationship with CKA: _____	
<b>Complainant – personal details:</b>	
Name _____	Sex: <input type="checkbox"/> Male <input type="checkbox"/> Female
Address: _____	
Phone: _____	
Mobile: _____	
E-mail: _____	
Age: _____	
Relationship with the perpetrator: _____	
Relationship with CKA: _____	
Occupation: _____	Workplace: _____
<b>Suspected perpetrator – personal details:</b>	
Name _____	Sex: <input type="checkbox"/> Male <input type="checkbox"/> Female
Address: _____	
Phone: _____	
Mobile: _____	
E-mail: _____	
Age: _____	
Relationship with the Perpetrator: _____	
Relationship with CKA: _____	
Occupation: _____	Workplace: _____
<b>Details:</b>	
<i>Describe the incident. (What happened, to whom and when?) Who is the suspected perpetrator, who are the persons involved in the reported incident? Has the person reporting the incident spoken directly with the complainant? What words and phrases did the complainant use to describe the incident? If another person reported the incident, on what grounds did (s)he do that? Were there other people present?</i>	
<b>(Please continue on a separate sheet if necessary)</b>	
Date of notification: _____ Time of notification: _____	
Place of notification: _____	



**Immediate evaluation of reported incident**

**Safety of complainant -** *(Is immediate action necessary?)*

**Who is aware of the incident?** *(authorities, family members, etc.)*

**Prior proceedings** *(report to the police, etc.)*

**Name of person completing form:** .....

**Date:** ..... **Signature:** .....



**Appendix 2: Committee situation assessment form**

To be filled by the Committee with 24-48 hours from the time of notification and updated on a regular basis in the course of the investigation.

<b>Case number:</b> .....	<b>Date of completion:</b> .....
<b>Situation of complainant:</b>	
<u>Are there any circumstances that directly endanger the safety of the complainant?</u>	
Was there a need of immediate medical or other support?	
What kind of other support is necessary?	
Are those provided by CKA or is it necessary to contact external providers (lawyers, mediators, etc.)	
<b>Cooperation:</b>	
<u>Is it necessary to notify the authorities or other external bodies? If yes, what are those?</u>	
How is it possible to cooperate more effectively with the authorities or other external bodies?	
<b>Information:</b>	
<u>What kind of support can CKA provide for the complainant?</u>	
<b>Involvement:</b>	
<u>Is it a high priority case? If yes, why?</u>	
<u>Does any conflict of interests arise in connection with the investigation of the case? If yes, what measures are necessary?</u>	
<u>Is there a need for the development of a crisis communication plan in connection with the case?</u>	

**Appendix 3: Action Plan**

Risk	Person at risk	Description of risk	Risk level: high, moderate, low	Necessary measures to prevent risk	Person responsible for case	Time frame
Example 1	Complainant	Complainant at a risk of losing job due to participation in CKA activities.	High	CKA initiates consultation with the complainant's employers OR appeals to the Equal Treatment Authority with the involvement of a lawyer.	X	Within 8 days
Example 2	Complainant	Complainant came to a conflict with one of the activists, that ended in a fight. Complainant wants the activist out of CKA.	Low	Conflict management and mediation provided by task force leader.	X	Within 2 days
1.						
2						
3.						

Name of person completing the form: .....

Date: ..... Signature: .....

**Appendix 4: Case closure form**

Case number:

Proceedings taken	Person responsible for taking action	Results

**RESULT OF INVESTIGATION:**

- ☐ complaint justified  
☐ complaint not justified  
☐ merits of complaint could not be confirmed

**CONSEQUENCES OF INVESTIGATION:**

**LESSONS LEARNED** (Strengths and areas for improvement for further investigations)

Name of person completing the form: .....

Time of completion .....

Signature of person completing the form: .....



**Appendix 5: Photo and Video Consent Agreement:**

**AGREEMENT**

Name of subject: .....

Place and time of birth: .....

Address: .....

Mother's name: .....

Email address/phone number ..... – as right-holder

and the Civil College Foundation – hereinafter CKA - (administrative address: 37/2 Kunbábony, Kunszentmiklós, postal code: 6090) court registry number: 12.Pk.61.418/time: 1994, tax number: 18070008-1-03, represented by Máté Varga - **as user**

in the undersigned time and place in connection with the recordings made during the following project/event provided by CKA (name of project/event: .....

agree on the following:

The right-holder, by signing the present Agreement, hereby allows the perpetuated use of the recordings involving the right-holder (photographs, video and/or audio recordings or certain elements, parts thereof, whether in uncut, edited or unedited form, hereinafter Recordings) in the abovementioned project/event by CKA. CKA may reproduce, distribute, publicly present and sublicense the use of the Recordings to third parties.

Furthermore, the right-holder allows the procession of the personal data provided by the right-holder (name, place and time of birth, mother's name, email address, phone number) in connection with the Recordings by CKA, to the extent necessary, in accordance with CKA privacy policy. The right-holder, by signing the present Agreement, hereby states that the present consent to the procession of personal data is voluntary.

The user acknowledges to use the abovementioned personal data for the exclusive purpose of identification and notification.

Right-holder does not and will not require payment for being involved in the Recordings, and has no reimbursement claims in connection with the use and distribution thereof.

Date: Budapest, 20.....

Signature



**Appendix 6.A.: DECLARATION OF COMPLIANCE for workers, volunteers, supported individuals**

I ....., the Undersigned, as worker / volunteer of the Civil College Foundation, acknowledge with my signature that I have read and fully understood the safeguarding policy protecting vulnerable groups and children, agree with its content and abide by the policy in the course of my work.

- During my work, I will pay a special attention to the protection of vulnerable groups and children and provide a safe environment for them.
- I am committed to reducing the occurrence of risk factors of harm as far as possible, and participate in the preparatory activities provided by CKA, I adhere to the conduct regulations included in the appendix of the present policy.

In case I become aware of the abuse of any co-worker, volunteer or person participating in our activities, I will provide assistance during the process of making a complaint, and, if the person concerned is under 18 years, I will notify the complaints committee of CKA in accordance with the procedures set out in the safeguarding policy.

Date: Budapest, 20.....

.....  
signature





**Appendix 6.B.: DECLARATION OF COMPLIANCE FOR SUPPORTED ORGANIZATIONS**

I, ....., the Undersigned, representing the organization supported by the Civil College Foundation (hereinafter CKA), acknowledge with my signature that:

I have read, understood and explained to the members of my organization the safeguarding policy protecting vulnerable groups and children.

I am organizing an internal training on the contents of the policy in cooperation with the workers of CKA.

I agree with the contents of the policy and perform work abiding by the policy, and the members of my organization also undertake in writing to adhere to the policy.

During our work we pay a special attention to the protection of vulnerable groups and children, providing a safe environment for vulnerable groups.

As far as possible I intend to reduce the occurrence of risk factors of harm.

I abide by the conduct regulations (included in the appendix of the present policy), to which the members of my organization also undertake in writing to proceed with the same manner.

In case I or other members of my organization become aware of the abuse of any co-worker, volunteer or person participating in our activities, we will provide assistance during the process of making a complaint, and, if that person is under 18 years, we will notify the complaints committee of CKA, in accordance with the procedures set out in the safeguarding policy.

Date: Budapest, 20.....

.....

signature



## ***Appendix 7: Conduct Regulations***

1. I will treat every human being equally, without prejudice. I will not make offensive comments on the origin, ethnic background or sexual orientation of one another.
2. During my work no one will be discriminated against due to their origin, religion, ethnic background or sexual orientation.
3. Mutual respect is the basic condition of cooperating as a group. I will not make offensive comments on, verbally abuse or humiliate my fellow workers (including CKA workers, volunteers, members of a support group participating in trainings, or other partners.
4. I acknowledge that no form of physical aggression against my peers is tolerated.
5. I acknowledge that physical, verbal or sexual abuse, as well as cyber abuse against the participants of activities conducted by CKA qualify as breaches of ethics and are investigated at all times. When there is evidence for any kind of abuse my contract with CKA will be terminated, and legal actions will be taken if necessary.
6. I work with persons under 18 years on the sole condition that adequate supervision is provided by parents, adult relatives, teachers or social workers authorized by parents.
7. In case I become aware of verbal or physical abuse against persons I come in contact with during my work, I take the matter seriously at all times and proceed with the adhering to the procedures set out in the policy.

## ***Appendix 8 – Complaint Flow Chart***



