



*София, ул. Г. Бенковски №57*

## **CHILD SAFEGUARDING POLICY**

**NATIONAL ASSOCIATION OF RESOURCE TEACHERS**

**ADOPTED: 12.11.2023**



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### *Objectives of the internal child safeguarding policy*

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The non-profit association National Association of Resource Teachers (NART) is an organization established in 2011 that unites and represents professionals working in the field of inclusive education.

Its individual members are: resource teachers, general education teachers, psychologists, speech therapists, occupational therapists, pedagogical and non-pedagogical specialists, committed to creating a supportive environment for the effective participation of all students in the educational process at school and in extracurricular forms of learning and development.

The other main activity area of NART is related to supporting young people in vulnerable situations and conducting youth activities.

The Child Safeguarding Policy expresses NART's understanding that all forms of abuse/ violence and exploitation of children are unacceptable.

The purpose of the Internal Child Safeguarding Policy is to ensure the safety of children who come into contact with the Organisation in the course of implementation of its project, programmes, or as part of service provision or carrying out various activities.

In essence, this Policy constitutes a set of standards setting out our main principles, organisation arrangements, rules of ethical conduct, communication and partnership and ensuring that we are putting every effort not to allow in our work the possibility for any form of violence against children, and child exploitation or neglect.

By means of our internal safeguarding policy, we honour our conviction that it is necessary to take measures for safeguarding families from people who would look for opportunities to earn their trust and gain access for themselves to young children through the work of the Organisation. The possibility for staff, members, volunteers, donors or partners to abuse/ commit violence



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against children is taken serious by our Organisation and we are committed to working towards its prevention.

Safeguarding children shall be the responsibility of the entire Organisation but also of each of its individual members, employees or volunteers. All staff, members and volunteers shall be familiarised with the need to incorporate child safeguarding in all our activities. Relations with anyone who is found to have a relationship of child abuse/violence against children or child exploitation shall be terminated.

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*Principles behind the internal child safeguarding policy*

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This Internal Child Safeguarding Policy is based on the UN Convention on the Rights of the Child of 1989 (as well as its Protocols); the UN Statement of Commitment on Eliminating Sexual Exploitation and Abuse; the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse and any other child-related international documents Bulgaria is a party to, EU Directives, the Child Protection Act, national and international good practice, as well as the long years of experience NART has in creating organisational conditions for child safeguarding within its structures throughout the country.

In developing this Policy we build on our experience and the Keeping Children Safe child safeguarding standards.

The principles on which the NART safeguarding policy is based are:

- The best interests of the child are central to professionals and paramount in the safeguarding actions undertaken;
- Respect for the child's views;
- Non-discrimination.
- Respecting the right of every child to protection from violence, abuse or neglect.
- Understanding maltreatment prevention as ensuring proper treatment our work with children, schools, communities;
- Any member of the Association, employee or volunteer of NART is responsible for supporting child safeguarding.



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- NART is obliged to take care of the rights of children with whom it comes into contact, with whom we work or who are in one way or another affected by our work.
- NART is committed to insisting and supporting its partners in taking responsibility to observe the minimum safeguarding requirements.

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### *Definitions and terms*

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This in-house child safeguarding arrangement is a system of responsibilities which NART develops in order to guarantee that the Organisation's members, employees and volunteers in their activities, services, project and programmes do not harm children, do not expose them to risk of abuse and that all concerns about the safety of children in the communities where these work are reported to the competent authorities.

#### **Harm and abuse definitions**

**A child** is every person under the age of 18 years.

**Physical abuse:** Actual or potential physical harm caused by another child or adult. It can include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, including falsification of symptoms or deliberate deterioration of the child's health.

**Sexual abuse:** Involves forcing or enticing a child to take part in sexual activities, whether or not they are aware of what is happening. The activities may involve physical contact, including assault by penetration or non-penetrative acts. They may also include involving children in looking at, or in the production of pornographic materials or encouraging them to behave in sexually inappropriate ways.

**Sexual exploitation of children:** A form of sexual abuse which includes children involved in sexual activities for money, gifts, food, shelter, attachment, status quo or something else children or their families need. This form of abuse can be associated with child manipulation, grooming, earning their trust or providing access to alcohol and drugs. This type of abuse relationship between victim and perpetrator is based on misbalance of power, whereby the victim's room for manoeuvre is highly limited. This type of abuse can be misunderstood by children and adults as relations based on mutual consent.



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Sexual exploitation of children can occur in different ways. It can include an older perpetrator exercising financial, emotional or physical control over a minor or underage person. It can involve peers too, who manipulate or incite the victim to participate in sexual activity, sometimes as part of a gang or a neighbourhood. This form can also occur through an organised network of offenders who get financial gains from child trafficking to different locations so that the children can be involved in sexual activities with a large number of people. Includes also online sexual exploitation.

**Neglect:** Depending on the context, resources and circumstances, neglect or unresponsiveness can be defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development such as failure to provide adequate food, clothing and shelter, or neglect or unresponsiveness to the child's basic emotional needs. Neglect can consist also in lack of responsible behaviour on the part of the mother during pregnancy, alcohol and drug use, as well as undercare for a child with disability.

**Passive neglect:** This is the attitude on the part of professionals of not expecting achievement, development and self-actualisation from certain children and failing to act in relation to meeting their specific needs.

**Psychological (emotional) abuse:** Constant emotional maltreatment affecting the child's emotional development. Acts associated with emotional abuse can include restriction of movement, patterns of belittling, denigrating, scapegoating (including cyberbullying), threatening, scaring, discriminating, ridiculing or other forms of rejecting or hostile treatment. Manipulation, estranging the child from their parent/ parents on the part of a parent or alternative-care structure, supporting structures or services also constitute emotional violence and abuse.

**Harm:** Some interventions generally seeking to support can harm a particular child, if they are not considered carefully, if they are not aligned with the individual specificities and context of the case, or if no risk assessment is undertaken prior to their being carried out. Sometimes doing nothing is better than an intervention in which there is a risk of detrimental consequences. "Doing no harm" refers to the Organisation's responsibility not to harm or to mitigate the harm that can be unintentionally incurred as a result of inappropriate description or implementation of activities included as part of projects, programmes or services.

**Secondary victimisation:** Causing additional suffering to the child through the way in which the institutions responsible for reporting, investigating and administering justice in the name of fair



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justice traumatise the child via inadequate treatment, unadapted legal procedures, lack of a holistic approach.

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### *Scope*

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This Policy shall cover all members and employees of the Organisation, all volunteers and interns, as well as our partners.

By members of the Organisation we mean the members of the General Assembly of the Association, which is the supreme management body, and the NART Board of Management, which does the operational management of the Organisation.

By employees we mean all who are employed:

- ☐ under labour contracts;
- ☐ under civil contracts, external consultants, trainers at NART's company;
- ☐ interns and volunteers.

By partners we mean:

- ☐ all partners, including the ones based in the communities where we work;
- ☐ international partners;
- ☐ guests and visitors;
- ☐ media and their representatives.

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### *Prevention*

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NART regards child safeguarding from abuse and protection of the rights of children as its overriding responsibility and in order to make sure these are respected, The Association shall undertake the following steps:



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**1. NART shall apply even more consistently this system of criteria and principles in preparing any new project, service, programme or activities involving children.**

1.1. Developing programmes/ projects/ initiatives: In developing projects NART should always keep in mind the best interests of the child and assess the possible risks for children in the activities to be undertaken;

1.2. Direct work with children: A large proportion of NART's work includes direct work with children – individual or group. This requires a safe environment – both physical, as well as one safeguarding the child's psychological and emotional state. As regards the physical environment, this implies making buildings and building installations safe, which shall be the responsibility of the Manager in charge for the activity. As regards psychologically and emotionally safe environment, an individual assessment shall always be carried out prior to individual work with children, while in group work the group dynamics shall be monitored. The voluntary principle shall be observed.

1.3 Group work with children within the Organisation: NART works with children also in groups for various purposes – by recommendation in the individual assessment, for acquisition of skills, for advice, for socialisation, for working with trauma or emotions, etc. The group gets together at a time convenient for the children, following obtained consent from the children and parents/ holders of parental rights. The group shall be led by a group-work expert and rules for group work shall be adopted. Pictures shall be taken only by exception, having obtained prior consent.

1.4 Taking the children outside the Organisation: When taking a group of children outside the Organisation, the first thing to do shall be to check the safety of the place to visit, including from the point of view of preventing possible incidents. Either public transport or private transport shall be used, depending on the national legislation. If there is an overnight stay, children shall be accommodated according to age, gender, the capacity of the place and children's wishes. No adult can share a bed with a child. Children shall be accompanied by a responsible adult, there being no more than 7 children to an adult in charge.

1.5. Visitors to the Organisation meeting children: NART organises on the spot visits in its premises – study visits, open doors events, etc. Each visitor should have agreed to observe the NART Child Safeguarding Policy and not take pictures during the visit without explicit consent. Details can be found in the rules of NART's Communication Policy.



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1.6 Children and the media – NART has developed its Communication Policy applicable to all members of staff. It includes mandatory consent on the part of children, parents and child protection authorities when the participation of children in NART public events is required, including in production and dissemination of images, video materials, etc. In order to disseminate materials produced by children – drawings and other, prior consent is also required and an assessment shall be undertaken to determine whether a given material is suitable for dissemination and to what audience. Methods such as face blur, change of voice, change of name shall be used in relation to the child, as well as avoidance of the cutting technique in recorded programmes or else NART shall participate in such programmes only if a contract is signed for approval of the final version of the material prior to broadcast, etc.

1.7. Participation of children in public events: Children can participate in public events of NART or partner organisations on condition that the principles of ethical child participation, voluntary participation, prior consent by children and parents/ holders of parental rights and safety rules are observed.

1.8 Personal data protection for children: Personal data protection is provided for in the legislation and there is a person responsible for the protection of personal data in the Organisation. Besides, bearing in mind the sensitivity of the data with which NART works, information shall be disclosed in compliance with the legislative requirements for sharing information and following a careful consideration of the risks arising from information disclosure, with the consent of the persons concerned.

1.9. Making position statements before institutions in respect of policies and draft legislation: NART staff and members can present before institutions the position of NART on a given issue, having agreed it with the Chairperson of the Board of Management. This position should take account of the best interests of the child and cause no danger for them.

1.10. Participation of children in studies and surveys: In its work NART conducts a number of studies and surveys, including with child respondents. In such cases children should be informed in advance about what they are taking part in and in what way their opinion will be presented; there is also a requirement for prior consent on the part of the children and parents/ holders of parental rights; the children should be participating voluntarily and be asked questions that concern them.

## **2. Recruitment of staff**





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Staff recruitment seeks to get hold of professionals who share NART's objectives and mission, and they agree and commit themselves to safeguarding children from any forms of violence and abuse.

The Organisation's recruitment policy is based on clear selection procedures, well-developed job descriptions, an in-house development system, an internal system for support, training and supervision, an internal monitoring and quality assessment system.

All members of staff shall be employed by the Organisation following a competition with clear qualifications and professional-experience requirements and a clear description of the job one applies for. The Evaluation Panel shall always include the employee in charge of the internal policy for safeguarding from abuse in the respective structure.

The set of documents required for appointment in NART shall include both a criminal record certificate and a certificate issued by the National Investigation Service that there are no checks or pre-trial proceedings against the selected applicant.

The set of documents required shall also include recommendations, including a letter of reference from previous employers when NART is not the first employer for the selected applicant. This recommendation shall contain information about the appointee's experience of working with children. The recommendations, the experience and qualifications of the applicants shall be subject to inspection on the part of NART.

During the interviews for all NART positions, a set of questions shall be asked to check the knowledge and skills for guaranteeing the safety of children, preventing the risk from harm and reporting concerns about possible risks.

Upon their appointment each NART employee shall complete a declaration of consent (Annex No. 2) to be removed from direct work with children should there be a report of some behaviour of theirs putting the children they work with at risk and this shall be sustained until the case is decided on by the competent authorities.

All employees of the Organisation shall first be appointed on probation for a period of six months.

All the employees of the Organisation shall be informed in a suitable way about the Internal Child Safeguarding Policy.

Every year, at a general team meeting, the implementation of this Policy shall be reviewed and, should there be any amendments, the members of the NART team shall be duly informed.



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Special requirements related to guaranteeing the safety of children and prevention of the risk from harm to children shall be included in the job description of every member of staff, every volunteer or intern in these services, as well as all experts and supervisors.

All our members shall be informed about the child safeguarding policy and upon enrolment in our membership lists they shall complete a declaration of consent to be removed from direct work with children should there be a report of some behaviour of theirs putting the children they work with at risk and this shall be sustained until the case is decided on by the competent authorities.

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### *Code of Ethics/ Conduct of Conduct*

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NART is an association that sticks to the rules of proper treatment, respect for the rights and dignity of people in the work of its staff.

The staff and members of NART shall base their behaviour in relation to children and their families on professional principles and values:

- Acceptance of and respect for the individuality, dignity and self-determination of each human being;
- Placing paramount importance on the best interests of the child;
- Confidentiality when providing help, which we understand as using the obtained information professionally for professional purposes only;
- Support for people's strengths and resources;
- Doing no harm.
- Clear professional boundaries in the relations with children and their families;
- Non-judgmental attitude to the people with whom we work and respecting their personal story;
- Individualisation of the work and placing the interests of the child in the centre;
- Empowerment and participation of children and families in activities seeking to support, develop, protect and safeguard them;



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- Teamwork in casework, adequate exchange of information within the team, respect for the other team members.

The Code of Ethics shall be mandatory for all staff, members, interns and volunteers of the Organisation.

Every member of staff shall be familiarised with NART's Code of Conduct/ Code of Ethics upon appointment in the Organisation.

Every member of staff shall be obliged to report any breach of the standards and rules of conduct set out in the Code of Conduct.

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### *Training*

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All employees, members, volunteers and members of management bodies shall be trained in the Organisation's policy for safeguarding children. They shall get a copy of the Policy and shall be asked to sign a declaration in which they confirm that they have received a copy, have read it and understood it. Every year, at a general team meeting, the implementation of this Policy shall be reviewed and, should there be any amendments, the members of the NART team shall be duly informed.

Persons employed as independent contractors under NART contracts shall get a copy of the Organisation's Child Safeguarding Policy and shall sign a declaration in which they confirm that they have received a copy, have read it and understood it.

Members of our organization shall be informed and shall sign a declaration in which they confirm that they have read the Policy and understood it.

Volunteers to the Organisation shall be monitored by the team leader who they report to in order to guarantee that they do not misuse confidential information concerning children. Should any concerns arise, the managers shall inform the Director of Human Resources, who, in turn, shall initiate further investigation.

Children and families with whom the people working in the Organisation get in contact as part of their professional work shall be familiarised with this Policy.



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### *Designing safe programmes and projects*

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In the course of developing any programme, project or work plan, the risk from harm or from violence or abuse shall be taken into account. Risk assessment and evaluation of the measures undertaken shall be integrated in the Organisation's Annual Plan, the individual plans of the lead programmes in it, the annual programmes and all projects.

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### *Communication – use of information and images of children*

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When we use information or visual images, our principle shall be to treat respectfully the dignity of the children, families and communities. Our Communication Policy contains the Organisation's detailed procedures.

In the course of work and project implementation, sometimes we have to use information and/or images of children for various purposes, including publicity. The Organisation is aware of its responsibility about the way in which children are presented and, when communicating, it shall observe the principles stipulated in the UN Convention on the Rights of the Child and the procedures set out in:

- ☐ The Constitution of the Republic of Bulgaria, Art. 32;
- ☐ The Child Protection Act;
- ☐ The rules in respect of personal data protection measures in pursuance of Regulation (EU) 2016/679 of the European Parliament and the Council of 27th April 2016 on the Protection of Natural Persons with Regard to the Processing of Personal Data and on the Free Movement of such Data, and Repealing Directive 95/46/EC (General Data Protection Regulation), hereafter referred to as the Regulation, and the Personal Data Protection Act.

Showing respect for the dignity of children, families and communities, our Organisation shall also comply with:

- The principles established in our Communication Policy as regards each information/ text or image concerning the children and their families;



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- The established by practice procedure for participation in media (on the part of staff, representatives of the Organisation, child or adult users of the services) and procedure for communication during events, initiatives, campaigns and other forms of publicity organised by the Institute.

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### *Social networks*

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Internet is a media difficult to control and regulate. This is why when communicating through different online channels (social networks, blogs, fora, etc.), NART shall introduce a specific policy setting the rules and procedures on how NART staff can use these channels, as well as the rules for involving children in such communication, promoting the safe use of Internet. The policy for the use of online channels shall be compliant with the principles informing the Organisation's Communication Policy and shall form part of it.

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### *Responsibilities*

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The Communication Policy of NART was approved by the Organisation's Board of Management and the Organisation and Management Team; it is disseminated to and understood by the staff of NART and all remaining persons who are concerned with its application. Responsibility shall be ensured through clear allocation of roles and obligations, control over their performance and periodic review of the procedures as regards their completeness and efficiency in correspondence with our structure and ways of organising our work.

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### *Partners*

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In each agreement with a partner for joint work, NART shall include a provision to the effect that in the absence of a policy for child safeguarding with the Partner, the latter shall follow the requirements and rules in this Policy.

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### *Reporting concerns*

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As an organisation fully sharing and supporting the principles in the UN Convention on the Rights of the Child, all members of staff, external consultants, volunteers and partners of the Organisation share the view that violence and abuse against children in all its forms and aspects are totally unacceptable. In this sense, the Organisation shall create clear rules and procedures for reporting, reviewing and undertaking measures on each report of violence against a child within the scope of the activities implemented by NART. The responsibility for developing a procedure with specific steps, as well as for taking the necessary action to inform staff, children and their parents about the Policy, lies with the management team of the Organisation. It is the responsibility of each member of staff, member of the association, volunteer or partner of the Organisation to comply with the Policy and procedure.

As an organisation we shall make sure that each report of violence or abuse shall be taken and considered seriously and responsibly, observing the principle of confidentiality of information. The safety and best interests of the child shall always be top priority. Every child, parent, member of staff, member of the association, volunteer or partner of the Organisation can freely report abuse or violence.

**The NART employee in charge of the Child Safeguarding Policy shall be Borislava Gitsova.**

Each reported abuse or violence shall be forwarded to her, who shall, objectively and in a bias-free way, order due investigation on the allegation. In support of a non-biased outcome of the report, the Manager shall set up an Internal Investigation Commission to consider the case and propose action to the Manager. Any violence or abuse report shall be reported to the NART person in charge Ms. Borislava Gitsova on telephone number 08995525686 and in writing.

Any information pertaining to abuse shall be documented so that all cases get registered. The register shall be kept and stored at NART headquarters. The person in charge of the register shall be Ms. Borislava Gitsova. The information in it shall be kept a secret and treated confidentially. Confidentiality shall be breached only if and when in the best interests of the child.

Any employee reporting violence or abuse with serious consequences shall be protected to the extent possible from behaviour and treatment damaging their prestige since the Organisation shall assume that they have reported their concerns out of pure motives. Deliberate fraudulent allegations shall be considered a serious breach of the internal rules and shall result in internal investigation, as well as disciplinary action.

The reported offender (and alleged perpetrator) and all witnesses should fully collaborate with the internal investigation and the hearings as part of this investigation. Observing the confidentiality



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principle in terms of the information they share shall be a leading principle, this information being shared only with those who should know it.

In case of reported concerns against a member of the team, the latter shall be suspended immediately from direct work with the child for as long as they are under investigation. If the allegation has to do with a criminal act, it shall be reported to the authorities, prior to taking any action or informing the alleged perpetrator in order to make sure that the internal investigation will not compromise the criminal proceedings.

Internal investigations shall be headed by the Manager of NART or the Organisation's person in charge, should the case require it. The investigation shall include interviews with all parties, including witnesses, in order to gather all required details that have to do with the allegation, collect and consider any written statements or objective evidence relevant to the allegation.

If the allegation proves a true fact, the Manager or the NART employee in charge shall propose to the Chairperson of the NART Board of Management a suitable disciplinary action against the perpetrator. If the allegation proves a false one, necessary steps shall be undertaken to mitigate the harmful effect of the false allegation on the reputation and mental state of the wrongly accused person.

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### *Criteria for evaluation of the policy implementation*

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Signatures of staff in place testifying to the fact that they are familiar with the Policy

Availability of a child-friendly version of the Policy

Availability of a clearly developed procedure with specific steps and designated staff in charge

Availability of mapped out local resources that can be used in case of abuse, violence or incidents

A flow chart in place on reporting abuse and incidents

A register in place in the Organisation of reported abuse and violence against children

Getting the personnel's views on improving the Policy every three years

Improving the Policy every 3 years.

Annual reporting on Child Safeguarding Policy implementation as part of the Organisation's Annual Report.



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*Monitoring and revision*

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The Internal Child Safeguarding Policy shall be integrated in the Organisation's annual reports.

The Board of Management and the Organisation and Management Team shall review the reports regularly to ensure that child safeguarding measures are in place and they are effective.

This Policy shall be revised at least once every three years or whenever there is a need to reflect additional circumstances in this document





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## Annex No. 1

List of organisations, resources and professionals who can support the reporting of child abuse concerns and the response to reports of such concerns

### Legal resources

NART employee in charge - Borislava Gitsova.

### Legal Resources

Child Protection Department of the respective municipality .....

State Agency for Child Protection.....

Hotline for children.....

Police, the respective police station.....

Legal Adviser.....

The most important pieces of legislation in Bulgaria that have a bearing on child safeguarding are the UN Convention on the Rights of the Child and the Child Protection Act, Pre-school and School Education Act, Directive 2012 of the EU, the Penal Code, the Code of Ethics for People who Work with Children.

The UN Convention on the Rights of the Child and the national legislation in Bulgaria guarantee that every child has the right to protection from any forms of abuse or violence or ways of upbringing detrimental to their development; they have the right to freely formulate and express their views on all issues concerning them and the adults responsible for them should take due account of these views. Any action by the responsible adults should be in the best interests of the child, the best interests being established on the basis of an in-depth professional assessment by a multidisciplinary team.

### Criminal investigation

The Police shall be obliged to investigate reports of violence or abuse against children and inform the Prosecutor's Office of the findings from the investigation. It is the Prosecutor's decision



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whether to report the case to the Court, when the offence constitutes a crime under the Bulgarian Penal Code.

The age of majority in Bulgaria is 18 years. Up until a child reaches that age they have different criminal liability. It depends both on the act committed and on the age: namely, depending on if you are a minor (below 14 years of age) or an underage person (in the age interval 14-18 years of age).

Contact details for health and other services to which the victim might need access

Emergency medical aid.....

General Practitioner for children in residential care or the Medical Specialist of the service

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A paediatric psychiatrist/ a psychiatric service for children/.....

A child gynaecologist.....

Forensic medicine.....

Contact details of NGOs, other interested stakeholders and professional networks, including local agreements for action on concerns and reports related to child safeguarding and protection, AIDS, centres for women, sheltered homes and refugee hostels

National Network for Children .....

The closest Crisis Centre for Child and Female Victims of Violence.....

Other services for victims of violence.....

The closest Refugee Hostel

Community



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Annex No. 2

Declaration

of familiarity with The Child Safeguarding Policy

of the National Association of Resource Teachers

by .....

employed as a member of staff/member/volunteer by the National Association of Resource Teachers

on the following job position .....,

or

employed under a civil contract/ a volunteer/ a partner of the Association

I hereby give my permission to the National Association of Resource Teachers to request information from third parties (for example, a letter of reference from a previous employer of mine, a criminal record certificate).

...

I hereby declare that I am familiar with The Child Safeguarding Policy of the National Association of Resource Teachers and I do agree to observe the principles, code of conduct and procedures set out in this Policy.