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Child Protection Policy

Sdružení SPLAV, z. s.

Approved by	Board of Sdružení SPLAV, z. s.
Approval date	26.2.2026
Review due by (no later than 2 years)	5.11.2026 – part **12. Data Protection and Confidentiality Procedures** included

Purpose. This policy sets mandatory safeguarding and child protection rules for all staff members, volunteers, trainees, experts, partners and contractors acting on behalf of Sdružení SPLAV, z. s. It applies to all activities in which the association works directly or indirectly with children or creates situations in which children may be present, visible, recorded or otherwise affected.

This document is written as an organisation-specific policy and should be published on the association's website together with current contact details of the designated Child Protection Officer.

1. Definitions and organisation-specific risks

- **A child** means any person under the age of 18.
- **Child protection** means the measures taken to prevent and respond to abuse, neglect, exploitation, violence, harmful treatment or any other conduct that threatens a child's safety, dignity or healthy development.
- **Child safeguarding** means the wider responsibility of the organisation to ensure that its staff, operations, communications, events and projects do not expose children to avoidable harm.
- **Organisation-specific risks in the context of Sdružení SPLAV, z. s.** include in particular: educational and participatory activities with schools and youth groups; workshops, camps, excursions, public events and community meetings; transport to and from activities; online communication and hybrid events; photography, video and social media outputs; collection and storage of children's personal data; contact

between children and adult staff, volunteers, external lecturers or partner organisations; and situations where a child discloses harm occurring outside the organisation.

2. Unacceptable behaviour

- **All persons covered by this policy must not** engage in sexual activity, sexualised communication, harassment or exploitation involving a child.
- **They must not** use physical punishment, humiliating treatment, intimidation, degrading language, bullying, discriminatory behaviour or threats.
- **They must not** be alone with a child in a hidden, isolated or non-transparent setting unless this is unavoidable for safety reasons and another responsible adult is informed.
- **They must not** exchange private gifts, initiate secret communication, request personal contact on private social media accounts, or build relationships that could reasonably be seen as manipulative, coercive or inappropriate.
- **They must not** photograph, film, publish or otherwise share a child's image, voice or story without the required consent and without a legitimate programme purpose.
- **They must not** consume alcohol, illegal drugs or any impairing substances while responsible for children or while taking part in activities covered by this policy.

3. Safe recruitment and engagement procedures

- **Before any employee, volunteer, trainee or long-term external collaborator starts direct work with children, the association must** verify identity, assess suitability for the role, and provide this policy for review and signature.
- **For roles involving direct or repeated contact with children, the association must** require an extract from the Czech Criminal Register (Rejstřík trestů) or an equivalent official document for non-Czech nationals, and may request references relevant to previous work with children or vulnerable groups.
- **Recruitment records must** document who checked the applicant, when the check was completed and whether any risk-mitigating conditions were imposed.
- **Every person covered by this policy must** sign a Declaration of Compliance before starting the activity and must immediately report any new circumstance that could affect their suitability to work with children.

4. Safe working practice

- **Activities involving children must** be planned so that supervision is adequate, responsibilities are clear, and at least two responsible adults are available wherever reasonably possible.
- **Parents or legal guardians must** receive clear information about the activity, its purpose, schedule, contact persons, transport arrangements if relevant, and any use of photographs, recordings or online tools.
- **Communication with children must** be respectful, age-appropriate, transparent and related to the activity. Wherever feasible, communication should happen through official channels or with the knowledge of parents, schools or another responsible adult.
- **One-to-one meetings must** take place in visible or open environments, or with suitable procedural safeguards, unless urgent protection needs require a different response.
- **Any concern that a child may be in immediate danger must** be treated as a priority over internal administrative steps.

5. Data protection, images and digital safety

- **Sdružení SPLAV, z. s. must** process children's personal data lawfully, fairly and only to the extent necessary for the relevant activity.
- **The association must** keep consent forms, attendance records, contact details, incident records, photographs and recordings securely, with access limited to authorised persons.
- **Children's full names must not** be unnecessarily combined with identifiable images in public outputs.
- **Online sessions must** use proportionate security settings, appropriate moderation and clear behavioural rules.
- **Sensitive documentation relating to safeguarding concerns must** be stored separately from routine programme records and retained only for as long as necessary under legal, safeguarding and organisational requirements.

6. Training and awareness

- **All staff members, volunteers and trainees who may come into contact with children must** receive induction on this policy before the relevant activity starts.
- **Training must** cover recognising signs of abuse or neglect, professional boundaries, safe communication, digital safeguarding, recording concerns and reporting duties.
- **Refresher training must** take place at least once every two years, and earlier where activities, risks or legal requirements change.
- **Children, parents and partner organisations must** be informed in an accessible way about the basic safeguarding expectations, contact points and complaint routes.

7. Child Protection Officer

- **The association must designate** a Child Protection Officer and a deputy.
- **The designated officer is responsible for** receiving reports, ensuring initial risk assessment, coordinating documentation, advising staff on immediate protective steps, maintaining secure records and deciding when escalation outside the organisation is required.
- **Current contact details to be published with this policy**

Name: Naďa Kasperová; role: project manager; email: nada@sdruzenisplav.cz; telephone: 604690685.

Deputy: Name: Petr Hudousek; Head of the Office; e-mail: petrh@sdruzenisplav.cz; phone: 736752217.

8. Reporting procedure

- **Any concern, suspicion, disclosure or allegation involving harm to a child must** be reported immediately to the Child Protection Officer or, if unavailable, to the deputy or a member of the governing body.
- **Verbal reporting must** happen without delay. A written Incident Report Form must be completed as soon as possible and no later than 24 hours after the concern becomes known.
- **The person receiving the report must** record factual information only, avoid leading questions, avoid promises of secrecy, and explain that the information will be shared only with those who need to act to protect the child.

- **The Child Protection Officer must** assess urgency, determine whether emergency services or police should be contacted immediately, decide on temporary protective measures, and make referrals to relevant external authorities when there is a reasonable safeguarding concern.
- **Retaliation against a person who raises a concern in good faith is** strictly prohibited.

9. External reporting and referral system

- **Where a child is in immediate danger or a criminal act is suspected, the association must** contact the Police of the Czech Republic using emergency number 158, or 112 where appropriate.
- **Where there is a concern that a child is at risk, neglected, abused or otherwise endangered, the association must** contact the relevant municipal authority with extended competence acting through the child protection authority (OSPOD – orgán sociálně-právní ochrany dětí) according to the child's place of residence or current location.
- **The association may also** cooperate with schools, school counselling services, healthcare providers or specialised support services where this is necessary for the child's protection and lawful information-sharing permits it.
- **Cross-border or project-partner cases must** be coordinated with the relevant partner organisation and competent authorities without delaying immediate protection steps in the Czech Republic.

10. Complaint mechanism

- **Children, parents, guardians, participants, staff members, volunteers and members of the public may** submit a safeguarding complaint or concern in person, by email, in writing or by telephone.
- **Complaints must** be acknowledged promptly, treated confidentially, assessed without unnecessary delay and documented in a secure manner.
- **Information about how to complain must** be available in child-friendly and adult-friendly form during activities and on the association's website.
- **The complaint process must** not replace emergency reporting duties where a child may be at risk.

11. Breach of the policy and disciplinary measures

- **Any breach of this policy must** lead to a documented management response proportionate to the seriousness of the breach.
- **Possible measures include** additional supervision, mandatory retraining, restriction of duties, suspension from activities, termination of cooperation, notification to partner institutions and reporting to public authorities.
- **Serious breaches involving potential criminal conduct must** be reported externally without waiting for the outcome of internal disciplinary action.

12. Data Protection and Confidentiality Procedures

Sdružení SPLAV, z. s. is committed to protecting children's personal data and privacy in accordance with the General Data Protection Regulation (GDPR) and applicable Czech legislation.

- **Collection and processing of personal data**

Only personal data necessary for organising and implementing activities shall be collected and processed on an appropriate legal basis. Children and their parents or legal guardians shall be informed about how their data is used.

- **Confidentiality and secure storage**

Access to children's personal data shall be restricted to authorised persons. Electronic and paper records must be securely stored, kept only for the necessary period and safely deleted or destroyed afterwards.

- **Photography and publication**

Photographs, videos and personal information identifying children may only be collected, used or published with an appropriate legal basis. Where consent is required, it must be obtained from the appropriate person.

- **Data sharing and safeguarding records**

Personal data may only be shared with third parties when legally justified and to the extent necessary. Child protection incident reports must remain confidential and accessible only to authorised persons.

- **Data breaches and individual rights**

Any suspected personal data breach must be reported immediately to the responsible person within Sdružení SPLAV and handled in accordance with GDPR requirements. Children and their legal guardians may exercise applicable data protection rights by contacting info@sdruzenisplav.cz.

These procedures apply to all staff, volunteers and external collaborators processing children's personal data on behalf of Sdružení SPLAV, z. s.

13. Review, publication and approval

- **This policy must** be reviewed at least once every two years and sooner if activities, risks, legal requirements or partnership conditions materially change.
- **The approved policy must** be publicly available online and communicated to all persons covered by it.
- **Annexes form** an integral part of this policy.

Reporting flow

1. Concern, disclosure or incident identified
2. Immediate verbal report to the Child Protection Officer / deputy
3. Immediate safety action if needed (emergency services, separation from risk, parent or guardian contact where appropriate)
4. Written Incident Report Form completed within 24 hours
5. Assessment, decision on referral, follow-up and secure record keeping

Date: 5.11.2026

Bc. Petr Hudousek
Head of the Office

Annex 1. Incident Report Form

Confidential – for internal safeguarding use only

1. Date and time of report: _____

2. Date and time of incident / concern (if known): _____

3. Place of incident / concern: _____

4. Name of child / children involved (use initials where possible): _____

5. Age / approximate age: _____

6. Name and role of reporting person: _____

7. Other persons present / witnesses: _____

8. Factual description of what happened / what was observed / what was disclosed:

_____

_____

_____

_____

_____

9. Immediate action taken:

_____

_____

_____

10. Was the Child Protection Officer informed? If yes, when and by whom?

_____

_____

11. External referral made? If yes, to whom and when?

_____

_____

12. Signature of reporting person: _____	**13. Date:** _____
14. Received by: _____	**15. Date and time received:** _____

This form must be submitted to the Child Protection Officer without delay and no later than 24 hours after the concern becomes known.

Annex 2. Declaration of Compliance

I, the undersigned, declare that:

☐ I have read and understood the Child Protection Policy of Sdružení SPLAV, z. s.

☐ I agree to comply fully with all of its provisions and instructions issued under it.

☐ I understand that any breach of the policy may lead to disciplinary action, suspension, termination of cooperation and, where appropriate, reporting to public authorities.

☐ I confirm that I will immediately disclose any circumstance that could affect my suitability to work with children.

☐ I consent to the checks required by the association for roles involving work with children, including the submission of an extract from the Criminal Register or an equivalent document where applicable.

Full name	_____
Position / role	_____
Project / activity	_____
Signature	_____
Date	_____

Annex 3. Short version for display at events

CHILD PROTECTION – KEY RULES

Listen to children. Respect boundaries. Do not ignore concerns.

If something feels wrong, report it immediately.

Emergency or immediate danger: call 158 or 112.

Report internally to: Child Protection Officer – Naďa Kasperová/ 604 690 685 / nada@sdruzenisplav.cz