

Safeguarding Policy of Glopolis, o.p.s.

Policy for the Protection of Children and Vulnerable Adults from All Forms of Abuse and Maltreatment

Table of Contents

1.	Introduction and Preamble	2
2.	Scope and Purpose of this Safeguarding Policy	2
3.	Policy Statement	3
4.	Prevention	3
4.1.	Risk Assessment	3
4.2.	Safe Recruitment, Education and Training for Employees and Associated Personnel	3
4.3.	Behaviour Protocols/Code of Conduct	3
4.4.	External Collaborators	4
4.5.	Partners	4
4.6.	Safe Programme Design	4
4.7.	Communications Guidelines	4
5.	Roles and responsibilities	5
6.	Enabling Reports	6
7.	Responding to Concerns	7
8.	Confidentiality	7
9.	Implementation and Review	7
10.	Important Contacts	8
11.	Annexes	9
11.1.	Definitions and Glossary of Terms used and covered by this Policy	9
11.2.	Legal framework at the Czech and international levels	12

Last updated and approved by Glopolis Board of Directors: 16. 3. 2021

Effective from: 16. 3. 2021

Review date: not later than 2024

1. Introduction and Preamble

Glopolis interconnects diverse entities and opinions to collaborate for pluralist democracy and sustainability. We strive to understand the specific problems of civic space and environment in a broader context, to nourish a more active dialogue, to foster better relations between proponents of different perspectives, and to coordinate practical projects between different groups of non-profits, investors, officials or farmers. We believe that respect, understanding, confidence and collaboration nurture a society that is united inwards, and responsible outwards.

Glopolis believes that everyone, regardless of age, gender identity, disability, religion, political views, sexuality, sexual orientation or ethnic origin has the right to employ one's own potential for decent life, with respect to other people and the Planet. Safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from all forms of abuse, maltreatment and exploitation, incl. abuse of power, neglect, and physical, psychological or sexual abuse and violence. In recognition of the special vulnerability of children and at risk adults, this policy affirms Glopolis commitment to promote their well-being and development and protection from all forms of abuse, maltreatment and violence, involving Glopolis employees and related personnel.

In designing and implementation of the Policy for the Protection of Children and Vulnerable Adults from All Forms of Abuse and Maltreatment (hereafter as "Safeguarding Policy"), Glopolis follows the International Child Safeguarding Standards, applied also to vulnerable adults in the context of their vulnerability (hereafter used term "people at risk" includes children and vulnerable adults), and are covering four areas:

- Standard 1 Policy: Glopolis develops a policy that describes how it is committed to preventing, and responding appropriately to, harm to people at risk.
- Standard 2 People: Glopolis places clear responsibilities and expectations on its staff and associates and supports them to understand and act in line with these.
- Standard 3 Procedures: Glopolis creates an environment safe for people at risk through implementing safeguarding procedures that are applied across the organisation.
- Standard 4 Accountability: Glopolis monitors and reviews its safeguarding measures.

Our Standards are based on the following set of principles:

- All people at risk have equal rights to protection from harm.
- Everybody has a responsibility to support the protection of people at risk.
- The organisation has a duty of care to people at risk, with whom we work, are in contact with, or who may be affected by our work and operations.
- If the organisation works with partners, it has a responsibility to (within its available capacity) help partners meet the minimum requirements on protection of people at risk.
- All actions on people at risk, including child safeguarding are taken in the best interests of the people and a child, which are paramount.

2. Scope and Purpose of this Safeguarding Policy

The purpose of this Safeguarding Policy is to protect vulnerable adults and children from any harm that may be caused due to their coming into direct or indirect contact with Glopolis. This includes harm arising from:

- The conduct of staff or personnel associated with Glopolis;
- The design and implementation of Glopolis programmes and activities.

This Safeguarding Policy sets out Glopolis approach to preventing and addressing all forms of abuse, maltreatment, and exploitation of children and vulnerable adults. This includes:

- Our commitments to prevent all forms of abuse, maltreatment and exploitation and to ensure effective action is taken when problems occur;
- Principles upon which we will base our decision making and actions;
- Our expectations of all those who work on behalf of Glopolis – the Safeguarding Policy informs all employees contracted by Glopolis and associated personnel of their responsibilities in relation to

safeguarding, whilst engaged with work or visits related to Glopolis, including but not limited to the following: members of Board of Directors and the Supervisory Board, interns; volunteers; contractors; programme partners.

3. Policy Statement

Glopolis has a zero tolerance towards all forms of abuse, maltreatment and exploitation of children and vulnerable adults. Child and vulnerable adults safeguarding is the responsibility that Glopolis has to make sure our staff, operations, and programmes do no harm to children and vulnerable adults, that is that we do not expose children and vulnerable adults to the risk of harm and abuse, and that any concerns we have about children's and vulnerable adults' safety within the partnerships and communities in which we work, are handled with care and/or reported to the appropriate authorities.

All forms of abuse, maltreatment and exploitation of children and vulnerable adults by Glopolis employees and associated personnel constitute acts of gross misconduct and are, therefore, grounds for disciplinary action and respectively termination of employment or contract/agreement.

Glopolis commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

4. Prevention

Glopolis will strive for the prevention through the following measures:

4.1 Risk Assessment

Risk assessment to identify the range of potential risks to children and vulnerable adults from the organisation's areas of work has been carried out as a base for designing this Safeguarding Policy. Whenever new programs or activities are launched, Glopolis will carry out the process of risk analysis. Furthermore, Glopolis will also review the risk assessment of ongoing programmes as part of the regular review of the Safeguarding Policy or whenever necessary/appropriate.

4.2 Safe Recruitment, Education and Training for Employees and Associated Personnel

Glopolis will:

- Implement safeguarding procedures when recruiting, managing and deploying staff and associated personnel.
- Ensure all staff have access to, are familiar with, and know their responsibilities within this Safeguarding Policy.
- Ensure safeguarding forms part of staff induction training, when employees join Glopolis and at a level commensurate with their role in the organization. This also includes Glopolis policies and values, the Code of Conduct, information about how to report concerns, and advice about where to seek further information about safeguarding and safer practices across the organisation.
- Designates one Glopolis employee as the Safeguarding Focal Point and ensures that this person understands her/his role and obligations according to this Safeguarding Policy.

4.3 Code of Conduct

Glopolis staff and associated personnel are bound with the [Code of Conduct](#), and also particularly in respect to this Safeguarding Policy obliged to:

- Treat all children and vulnerable adults with respect and not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

- Prevent, oppose and combat all exploitation and abuse of children and vulnerable adults.
- Report any concerns or suspicions regarding safeguarding violations by a Glopolis staff member or associated personnel to the designated Safeguarding Focal Point.

Glopolis staff and associated personnel must not:

- Subject a child and a vulnerable adult to physical, emotional, psychological or sexual abuse, neglect or exploitation.
- Engage in any commercially exploitative activities with children and vulnerable adults.

4.4 External Collaborators

- Any person who wishes to cooperate externally with Glopolis through the long-term provision of services (consultant, trainer, supplier) is informed about this Safeguarding Policy incl. main principles of child and vulnerable adults protection during the initial interview and undertakes to fully understand these principles. The reference to the Safeguarding Policy is a part of the external contract, if concluded.
- For one-time or short-term suppliers who do not have a cooperation agreement with Glopolis, information about the Safeguarding Policy is part of the services purchase order.

4.5 Partners

Glopolis will:

- Ensure that, when engaging in partnerships or sub-grant agreements, the parties in these partnerships and agreements are informed about this Safeguarding Policy and commitments of Glopolis in respect to child and vulnerable adults safeguarding.
- In case of a concern reported to Glopolis where a partner (its staff or/and associated personnel) is implicated in any way, Glopolis will follow the case with confidentiality and care according to the reporting procedure outlined in this Safeguarding Policy.

4.6 Safe Programme Design

Current Glopolis programs are not aimed at children or vulnerable adults, nor are they located in communities where there is a higher practice of abuse or maltreatment of children and vulnerable people. Glopolis does not carry out activities targeting children and vulnerable people. Yet for the prospective programme designing,

Glopolis will:

- Design and undertake all its programmes and activities in a way that protects children and vulnerable adults from any risk of harm that may arise from their coming into contact with Glopolis.
- Require employees and associated personnel to take proactive measures in this respect to avoid causing harm to children and vulnerable adults, and contribute to actively reduce existing risks throughout the programme and project cycle.
- This also includes the way in which visual images (photographs, video, or social media) and information about individuals in Glopolis programmes is gathered and communicated for P.R., communication and donor reporting purposes (see point 4.7).
- Where appropriate, use the networking and programme communication channels to inform a wider audience about the existence of this Safeguarding Policy and to increase awareness on the key safeguarding messages (e.g. through online materials and website).

4.7 Communications Guidelines

All Glopolis staff and associated personnel will follow the below principles when taking information and visual images of any person, particularly children and vulnerable adults for any P.R., communication and donors reporting purposes:

- **Principle of Dignity of the people concerned** – Glopolis will ensure photographs, films, videos and related messages present the people, including children and vulnerable adults, in a dignified and

respectful manner and not in a vulnerable or submissive manner. Glopolis will not use humiliating or discriminatory images and expressions in describing its programmes and activities. Images of all people, including children and vulnerable adults, must not show them in states of undress or in inappropriate poses.

- **Principle of Correctness** – Glopolis ensures images, stories and related messages are honest representations of its immediate and wider contexts and the facts to Glopolis best knowledge, and undertakes not to manipulate, misrepresent information about any person, incl. children and vulnerable adults. Glopolis acts with caution when combining texts and visual information to avoid images and related messages that potentially stereotype, sensationalise or discriminate against people, situations or places.
- **Privacy Principle** – Glopolis uses images, related messages and case studies with the full understanding, participation and permission of the subjects. It is absolutely necessary to obtain a signed informed consent from a parent or guardian of a child / vulnerable adult before making an image, making a film or collecting a story, and explaining how the image, related message and the story will be used. The children and vulnerable adults also need to be advised that they do not have to agree to participate in the image or story. Glopolis undertakes not to use any information about children and vulnerable adults whose publishing may put them at risk or lead to the disclosure of their privacy and identity. Details attached to images and included in stories must not allow that child / vulnerable adult to be traced to his or her home or community. Publishing of a child's or a vulnerable adult's first name also requires the signed consent of the person or the guardian.

5. Roles and responsibilities

Glopolis designates a person – **Safeguarding Focal Point** – who is responsible for:

- Ensuring that all Glopolis staff and associated personnel understand and comply with the Safeguarding Policy. In particular this means supervising the recruitment, induction and training, and also providing support and assistance to the team members on the subject of safeguarding;
- Receiving concerns, assessing the potential Safeguarding Policy breach, and consulting it with the Glopolis director in order to determine whether this is an internal or external matter and what is the appropriate action in accordance with Glopolis internal disciplinary action and the Czech law. This includes reporting all cases that constitute a crime according to the Czech Criminal Code to respective authorities.
- Ensuring that Glopolis partners and external collaborators are informed on the existence of Glopolis Safeguarding Policy, and including the reference to this Policy in all contracts appropriately, if concluded;
- Monitoring and reviewing the Safeguarding Policy regularly every three years (for details see also Chapter 9). This will be in line with legislative and organisational developments, feedback and lessons learned. The Glopolis Board of Directors, Glopolis Supervisory Board and Glopolis Director will be informed on the review;
- Displaying the name of the Glopolis Safeguarding Focal Point in the office and at Glopolis website.

Glopolis employees and associated personnel:

- Will contribute to creating and maintaining an environment across Glopolis operations that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Are required to report any suspicions or incidences of any form of abuse, maltreatment and exploitation on children and vulnerable adults to the Safeguarding Focal Point. Glopolis respects the best will of an individual, therefore there is no obligation for an individual to report any incident that has happened to him/her.

Glopolis Director:

- Holds overall accountability for the Safeguarding Policy and its implementation and provides clear guidance on how the organisation, across its operations, will ensure that all people, in particular vulnerable adults and children, are protected from all forms of abuse, maltreatment and exploitation in the delivery of projects and programmes.

- Has particular responsibilities to support and develop a safe working environment. This also includes the responsibility for ensuring that all staff and associated personnel receive the Safeguarding Policy induction.
- Provides consultations to Glopolis Safeguarding Focal Point in order to determine whether a concern is an internal or external matter and what appropriate actions Glopolis is to take, mainly in relation to the partners and external collaborators. The key principle is to keep the highest possible standards of safety and interest of children and vulnerable adults and the confidentiality.
- Prioritizes awareness raising for her/himself and her/his teams, and if necessary provides additional budget support for the activities related to the Safeguarding Policy implementation and review.

Glopolis Board of Directors holds overall accountability for the Safeguarding Policy, its implementation and review.

6. Enabling Reports

Glopolis will:

- Ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the associated personnel and the communities we work with.
- Follow up on reports of safeguarding concerns promptly and according to due process.
- Also accept concerns from external sources such as members of the public, partners and official bodies.

How to report a safeguarding concern:

- Glopolis staff members and associated personnel who have a concern relating to safeguarding or all potential violations of the Safeguarding Policy (whether it is a suspicion of violation, alleged violation or violation with a witness statement) are obliged to report it immediately to Glopolis Safeguarding Focal Point. If the staff member does not feel comfortable reporting to Glopolis Safeguarding Focal Point (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to Glopolis Director or a member of the Board of Directors.
- Any individual can raise a concern to Glopolis about an incident they have experienced, witnessed, or heard about, concerning a Glopolis staff member or partner or external collaborator without fear of retribution.
- The reporting can be done verbally or in writing to the Glopolis Safeguarding Focal Point or any other Glopolis staff who will pass it to the Safeguarding Focal Point. Glopolis employees and associated personnel *must not* investigate allegations or suspicions themselves.
- After receiving the information, the Safeguarding Focal Point's role is to assess the potential Safeguarding Policy breach, consult it with Glopolis Director or external experts if necessary, determine whether this is an internal or external matter and act in accordance with the Czech law, which means report all cases that constitute a crime according to the Czech Criminal Code to respective authorities.

Concerns about Glopolis's Partners

- Safeguarding concerns raised to Glopolis about other organisations or external collaborators should be referred to the Glopolis Safeguarding Focal Point, who will determine the appropriate action, based on the consultation with Glopolis Director and external experts if necessary.
- In general, Glopolis will expect a partner to respond to concerns and concerns in relation to children and vulnerable adults safeguarding, where a partner is implicated, safely, quickly and appropriately. Glopolis will *not* investigate cases related to other organisations, but does have an obligation to report, e.g. report cases to the relevant organisations involved where safe to do so, report to official authorities according to the Czech law, report to donors where appropriate and safe to do so.
- Where appropriate, Glopolis will support the partner to address the issue through an appropriate action. If the outcome is that abuse has occurred, ongoing work with the partner cannot involve the individual(s) concerned. If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a partner, then the partner will be asked to provide an explanation and ultimately may risk ending the relationship from Glopolis' side.

7. Responding to Concerns

Glopolis will:

- Respond in a professional and timely manner to all concerns or allegations of any form of abuse, maltreatment and exploitation as defined in this Safeguarding Policy. All concerns or allegations will always be taken seriously, and investigated and acted upon where appropriate, in line with our safeguarding principles and legal actions when required. The guiding principle is that the safety of the child and vulnerable adult is always the most important consideration. Any allegation or concern regarding the abuse of a child and vulnerable adult must be treated seriously and according to the ACT approach: Act on any concerns if a safeguarding issue; Child-centred - the protection of children/vulnerable adults is the most important consideration; Time counts: Ensure timely, effective, confidential and appropriate responses to safeguarding issues.
- Apply appropriate administrative or disciplinary measures to staff found in breach of Safeguarding Policy, and/or referral to the relevant authorities for appropriate action, including criminal prosecution.
- Ensure accountable case management: All allegations and subsequent follow-up, will be documented in a secure and confidential online archive to ensure accountability and review the Safeguarding Policy.
- In case it turns out that an allegation towards an employee/associated personnel is wrong, Glopolis will set up procedures to fully rehabilitate the person.

8. Confidentiality

- Confidentiality reflects the belief that people have the right to choose to whom they will, or will not, tell their story. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. Confidentiality promotes safety, trust and empowerment.
- Concerns can be made anonymously. Every effort will be made to maintain confidentiality at all stages of the process when dealing with safeguarding concerns.
- Information that identifies individuals involved in a concern will be limited to essential personnel and will not be shared further without obtaining the informed consent of those involved, except if someone's life is at risk, a child is at risk, or as required by law in consultation with legal counsel and where safe to do so. Non-identifying information will be shared as per reporting requirements.
- Sensitive information related to incidents of abuse whether involving colleagues, program participants or others in the communities in which Glopolis works shall be shared only with law enforcement authorities, Glopolis Director and Chairperson of Glopolis Board of Directors.
- Staff involved in the concerns process will be made aware of the importance of maintaining confidentiality and may be asked to sign a confidentiality agreement. Breaching this policy may put others at risk and will therefore result in disciplinary actions.
- All records and reports and subsequent case management must be kept in a secure place. Only the Glopolis Safeguarding Focal Point, Glopolis Director and Glopolis Chair of the Board of Directors have access to them.
- Glopolis will take action against anyone, whether they are the subject of a concern or not, who seek or carry out retaliatory action against a person who raises a concern, the affected child / vulnerable adult or other witnesses. Employees may be subject to disciplinary action, up to and including termination of employment. Others who work with Glopolis may have their relationship with Glopolis terminated.

9. Implementation and Review

- Glopolis will make every effort to create and maintain a safe organisational culture for all those who work for and with Glopolis, as well as those in the communities where Glopolis operates through prevention and response work, and holding those responsible for all forms of abuse to account.

- Glopolis commits to promoting accountability towards its constituency by: (i) being transparent about Glopolis programming, activities, and services; (ii) raising awareness about Glopolis [Code of Conduct](#) and Safeguarding Policy; (iii) actively seeking feedback from its constituency on Glopolis performance.
- The Safeguarding Policy will be regularly reviewed every three years or earlier if necessary. The review will assess what and how well Glopolis or the partner organisation is doing to keep children and vulnerable adults safe. The methods used for review will indicatively cover the self-assessment of the context, risks, scope, functioning and programmes of Glopolis. The tools will be adopted from the internal self-audit scheme recommended by The Keeping Children Safe. The review will inform the Glopolis Employees and Associated Personnel, the Board of Directors, Glopolis Supervisory Board and Glopolis Director on the key learning points, and help to decide where to focus improvements to child and vulnerable adults safeguarding.

10. Important Contacts

Glopolis Director: Petr Lebeda, lebeda@glopolis.org, + 420 607 682 015

Chairperson of the Board of Directors: Ladislav Červenka

Safeguarding Focal Point: Jitka Hausenblasová, hausenblasova@glopolis.org, + 420 773 687 861

Helpline: 116 111 (free of charge, anonymous, 24/7 for all of the Czech Republic)

Internet on-line counselling of the Helpline (free of charge, anonymous, 24/7 for all of the Czech Republic):

<https://www.linkabezpeci.cz/sluzby/chatuj-s-nami/>

The Public Defender of Rights (special section for children of the Public Defender of Rights):

<https://deti.ochrance.cz/>

Medical Rescue Service, Police, Fire Service: 112

Medical Rescue service: 150, 112

Police: 158, 112

Fire Service: 155, 112

11. Annexes

11.1 Definitions and Glossary of Terms used and covered by this Policy

The following definitions and terms are either namely used in this Policy or define the areas that this Policy covers. They were adapted with the use of the resources provided by World Health Organisation¹, Inter-Agency Standing Committee², UN Secretary-General's Bulletins³, the extensive resources of the UK platform BOND⁴, The International Child Safeguarding Standards⁵, Safe the Children's Resource Centre⁶, and the Czech Law.

Children:

According to the Convention on the Rights of the Child and in accordance with Czech law, child means any human being under the age of 18.

Vulnerable adults:

Vulnerable adults are any people aged over 18 years who identify themselves as unable to take care of themselves/protect themselves from harm or exploitation; or who, due to their gender, age, mental or physical health, disability, ethnicity, religious identity, political views, sexual orientation, economic or social status, or as a result of disasters and conflicts, are experiencing, or at risk of, abuse or neglect and as a result of their care need. Recommended procedures of this Policy relate to vulnerable persons to the extent corresponding to their vulnerability.

People at risk:

For the purposes of this Safeguarding policy, the term "people at risk" includes children and vulnerable adults.

Safeguarding:

Safeguarding means the responsibility that organisations have to make sure their staff, operations, and programmes do no harm to children and vulnerable adults, and that they do not expose them to the risk of harm and abuse, and that any concerns the organization has about children's and vulnerable adults' safety within the communities in which it works, are reported to the appropriate authorities. At the same time safeguarding means that the people's rights to live in safety, free from abuse and neglect are promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

Glopolis Employees and Associated Personnel:

¹ https://www.who.int/violence_injury_prevention/violence/global_campaign/en/chap3.pdf,
https://www.who.int/violence_injury_prevention/violence/global_campaign/en/chap5.pdf,
https://www.who.int/violence_injury_prevention/violence/global_campaign/en/chap6.pdf

²

<https://interagencystandingcommittee.org/inter-agency-standing-committee/iasc-six-core-principles-relating-sexual-exploitation-and-abuse>,
https://interagencystandingcommittee.org/system/files/181101_iasc_champions_sea_sh_strategy_final.pdf

³ (ST/SGB/2003/13) Special measures for protection from sexual exploitation and sexual abuse at
<https://www.unhcr.org/protection/operations/405ac6614/secretary-generals-bulletin-special-measures-protect-ion-sexual-exploitation.html>

(ST/SGB/2008/5) Prohibition of discrimination, harassment, including sexual harassment, and abuse of authority at

<https://documents-dds-ny.un.org/doc/UNDOC/GEN/N08/238/36/PDF/N0823836.pdf?OpenElement>

⁴ <https://www.bond.org.uk/resources-support/safeguarding>,

<https://www.bond.org.uk/resources-support/uk-ngo-safeguarding-definitions-and-reporting-mechanisms>,

https://www.bond.org.uk/sites/default/files/safeguarding_definitions.pdf

⁵ <https://www.keepingchildrensafe.global/blog/2019/02/15/implementing-child-safeguarding-standards/>

⁶ <https://resourcecentre.savethechildren.net/keyword/child-exploitation>

The term includes all employees of Glopolis. The term also includes persons who represent Glopolis, whether or not s/he is compensated: i.e. board members, volunteers, interns, and short-time employees and contractors.

A safeguarding concern:

It is a feeling or worry that a child or adult may be at risk of harm, or may have been harmed, by the organisation's staff, associates, programmes or operations. Concerns may relate to something directly seen or heard, or may relate to information which has come to the organisations through any means. A concern is not yet confirmed or fact-checked.

All forms of abuse, maltreatment and exploitation:

Use of the term "All forms of abuse, maltreatment and exploitation" throughout this policy refers to children as well as vulnerable adults. The below are listed the general, though not exhaustive, forms of abuse, exploitation and maltreatment that ground for child protection or safeguarding concerns:

Child Abuse or Maltreatment:

Child abuse or maltreatment constitutes all forms of physical and/or emotional ill-treatment, sexual abuse [all sexual activity with a child is considered child abuse], neglect or negligent treatment or commercial or sexual or other exploitation, resulting in actual or potential harm to the child's health, survival, development or human dignity by abusing responsibility, trust or power the abuser has in the relationship. Physical or sexual assault of a child by a stranger is not considered a form of maltreatment of children in the above sense of the word, but as an unlawful conduct under the Criminal Code.

Child Exploitation

Child exploitation refers to the use of children for someone else's advantage, gratification or profit often resulting in unjust, cruel and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.

Child neglect

Allowing for context, resources and circumstances, neglect and negligent treatment refers to a persistent failure to meet a child's basic physical and/or psychological needs when those responsible for their care have the means, knowledge and access to services to do so. This is likely to result in serious impairment of a child's healthy physical, spiritual, moral and mental development. It includes the failure to properly supervise and protect children from harm and provide for nutrition, shelter and safe living/working conditions. It may also involve maternal neglect during pregnancy as a result of drug or alcohol misuse and the neglect and ill treatment of a disabled child.

It includes:

- a) Physical neglect: failure to protect a child from harm, including through lack of supervision, or to provide a child with basic necessities including adequate food, shelter, clothing and basic medical care.
- b) Psychological or emotional neglect, including lack of any emotional support and love, chronic inattention, caregivers being 'psychologically unavailable' by overlooking young children's cues and signals, and exposure to intimate partner violence or drug or alcohol abuse.
- c) Neglect of a child's physical or mental health: withholding essential medical care.
- d) Educational neglect: failure to comply with laws requiring caregivers to secure their children's education through attendance at school or otherwise.
- e) Abandonment.

Physical abuse

Physical abuse occurs when a person purposefully injures or threatens to injure a child or young person. This may take various forms and manifestations such as beating, slapping, punching, shaking, kicking, poisoning, drowning, burning, choking, strangling and drowning, threatening with a firearm or other weapon, etc. The injury may take the form of bruises, cuts, burns or fractures. Physical abuse occurs even if the parent or other

responsible person neglects the symptoms of an illness, intentionally causes illness of the child or devises and deliberately stages the child's health problems, for which the child has to undergo repeated, difficult and painful medical checks and treatments.

Emotional/Mental abuse

Emotional abuse is inappropriate verbal or symbolic acts toward a child or a pattern of failure over time to provide a child with adequate non-physical nurture and emotional availability. It includes such conduct of carers that adversely affects the child's mental and emotional development and behaviour. It can take various forms and manifestations, such as repeatedly claiming that the child is not loved, has no value, is not good enough, or their value inadequately meets the expectations of the person taking care of them. It may also include expectations inappropriate for the child's age and development, exposing the child to danger or threatening the child. Emotionally abusive acts include restriction of movement, degrading, humiliating, bullying (including cyber bullying), and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile or rejecting treatment, inadequate rivalization of the sibling relationship, as well as the presence of the child in a situation where another close person or pet is verbally or mentally abused and denied contact with close persons. Such acts have a high probability of damaging a child's self-esteem or social competence. Emotional/mental abuse is partly present in all forms of child maltreatment, but it can also occur independently.

Sexual Abuse

The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with a child is considered sexual abuse. Sexual abuse is a broad term, which includes a number of acts, including rape, sexual assault, sex with a minor, and sexual activity with a minor, and also non-physical abuse such as encouraging a child to watch pornography and sexual activities, grooming behaviour, taking sexually exploitative images of children, and encouraging children to behave in sexually inappropriate ways etc. Sexual abuse includes situations where there is no need to overcome the child's resistance, or the child appears to cooperate in the activity because it does not understand the context of the abuse (with regard to age, cognitive abilities, relationship with the abuser).

Sexual Exploitation

Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Child Sexual Exploitation

A form of sexual abuse that involves children being engaged in any sexual activity in exchange for money, gifts, food, accommodation, affection, status, or anything else that they or their family needs. It usually involves a child being manipulated or coerced, which may involve befriending children, gaining their trust, and subjecting them to drugs and alcohol. The abusive relationship between victim and perpetrator involves an imbalance of power where the victim's options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual. Child sexual exploitation manifests in different ways. It can involve an older perpetrator exercising financial, emotional or physical control over a young person. It can involve peers manipulating or forcing victims into sexual activity, sometimes within gangs and in gang-affected neighbourhoods. It may also involve opportunistic or organised networks of perpetrators who profit financially from trafficking young victims between different locations to engage in sexual activity.

Sexual Harassment

Any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. Sexual harassment is particularly serious when it interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive environment. Sexual harassment may be unintentional and may occur outside the workplace and/or outside working hours. While typically involving a pattern of behaviour, it can take the form of a single incident. Sexual harassment may occur between or amongst persons of the opposite or same sex.

Violence

Violence is the intentional use of physical force or power, threatened or actual, against oneself, another person, or against a group or community that either results in or has a high likelihood of resulting in injury, death, psychological harm, maldevelopment or deprivation.

Gender Based Violence (GBV)

Gender-based violence refers to any act that is perpetrated against a person's will and is based on gender norms and unequal power relationships. It encompasses threats of violence and coercion. It can be physical, emotional, psychological, or sexual in nature, and can take the form of a denial of resources or access to services. These acts can occur in public or in private.

Grooming

Grooming generally refers to behaviour that makes it easier for an offender to procure a child for sexual activity. It often involves the act of building the trust of children and/or their carers to gain access to children in order to sexually abuse them. For example, grooming includes encouraging romantic feelings or exposing the child to sexual concepts through pornography.

Online grooming

Online grooming is the manipulation of identity or information in cyberspace in order to force users to a personal meeting. An attacker, who usually pretends to be someone else, seeks a suitable person to build confidence over time and forces them to meet in person, where he/she abuses or uses the victim in some way. It can also include sending an electronic message with indecent content to a recipient who the sender believes to be less than 18 years of age, with the intention of procuring the recipient to engage in or submit to sexual activity with another person, including but not necessarily the sender.

Bullying

Bullying is defined as deliberately causing harm to peers or within a single social group (e.g. within a class, sports club, or children's home), often repeated over a period of time, and a disproportionate division of power between the aggressor and the victim, which is difficult for the victim to defend themselves. It is manifested in various forms, the most common manifestations include: physical bullying (beating, kicking, stealing the victim's belongings), verbal bullying (inappropriate racist or homophobic remarks, threats, swearing) and mental bullying (isolation of the victim, not admitting to peer group). A specific form of bullying is **cyber-bullying**, i.e. bullying through social media and mobile phones, which are used to aggressively and deliberately harm users of these media. It can also be caused unintentionally – for example, an inappropriate joke gets out of control and can develop into intense cyber-bullying. It can be a phenomenon that remains hidden for a long time, with possibly fatal consequences. Forms of cyber-bullying cover cyber-stalking, cyber-harassment, exclusion and ostracizing, cyber-grooming, sexting etc.

Commercial exploitation

Exploiting a child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. It includes, but is not limited to, child labour.

11.2 Legal framework at the Czech and international levels

Glopolis Safeguarding Policy (hereinafter the 'Policy') is based on the UN Convention on the Rights of the Child (hereinafter the 'Convention'), the related Optional Protocols and the European Convention on the Procedural Rights of the Child. The Convention provides an international framework defining the rights of children to be protected against abuse and neglect (Article 19), discrimination (Article 2) and various forms of exploitation (Articles 32-36); in particular, it deals with children who are not receiving parental care (Article 20), refugee's children (Article 22), children at risk of drug addiction (Article 33), children living in non-freedom (Article 37, 40) and children living in situations of armed conflict (Article 38, 40), and takes into account children's rights to information and the right to participate in solving situations concerning them.

Issues related to the Especially Vulnerable Persons Protection Policy are based primarily on the Hague Convention on the International Protection of Adults; the Charter of Fundamental Rights of the European Union; the UN Convention on the Rights of Persons with Disabilities; Recommendation of the Committee of Ministers of the Council of Europe on the principles of legal protection of adults with reduced legal capacity and the Geneva Convention relating to the status of refugees.

The Policy respects the basic legal regulations for the protection of children and especially vulnerable persons in the Czech Republic:

- Convention on the Rights of the Child
- Optional Protocol to the Convention on the Rights of the Child on the involvement of children in armed conflicts
- Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography
- The Charter of Fundamental Rights of the European Union
- European Social Charter
- European Convention on the Exercise of Children's Rights
- Convention on the International Protection of Adults
- UN Convention on the Rights of Persons with Disabilities
- Recommendation of the Committee of Ministers of the Council of Europe on the principles of legal protection of adults with limited legal capacity
- Geneva Convention relating to the status of refugees.
- Civil Code - Act No. 89/2012 Coll., as amended
- Social and Legal Protection of Children Act No. 359/1999 Coll., as amended
- Criminal Code, Act No. 40/2009 Coll., as amended
- Victims of Crime Act No. 45/2013 Coll., as amended
- Labour Code, Act No. 262/2006 Coll., as amended
- Volunteer Service Act - Act No. 198/2002 Coll., as amended
- Personal Data Protection Act (GDPR) - Act No. 101/2000 Coll., as amended, and
- EU Directive 95/46/EC - GDPR Directive

We recognize that child abuse and exploitation occur in every country and society in the world. Glopolis respects all cultural and religious specificities, so our Policy takes into account the common framework based on a broad intercultural and interdisciplinary approach.

Labour-law relations of persons under the age of 18 are regulated strictly in accordance with the Labour Code, collaboration with persons under the age of 18 in the form of volunteer service is regulated strictly in accordance with the Volunteer Service Act – this legislation ensures protection of life, health, development, safety and protection against exploitation for persons under the age of 18 at the labour market. In this context, it is necessary to distinguish the concept of 'work' as a minor activity in the household or other natural environment of the child, which is intended to help with the household or alternative environment where the child lives and which corresponds to the child's age and abilities and does not have the character of an economic activity (Civil Code), and 'work activity' or 'employment relationship', which is associated with an activity having the character of a gainful or otherwise economic activity. Work activity in the Czech Republic is allowed for persons over the age of 15 with completed compulsory education, subject to specific conditions (length of shifts, overnight work). Children under the age of 15 can only perform artistic, cultural, sporting and advertising activities with the prior permission by the Jobcentre and under the protective conditions specified in the Act and in the permit. Authorization is not required for hobby activities in the above-mentioned areas of artistic, cultural, sporting and advertising activities, unless the activity is performed for remuneration. This legislation is based on the Labour Code.