



# **POLICY ON CHILD PROTECTION IN RESEARCH CONTEXTS**

*Adopted by a Decision of the Governing Board of the Center for the Study of Democracy of 12.01.2021.*



This Policy on Child Protection in Research Contexts (hereinafter called “the Policy”) regulates the activities of the Group of the Center for the Study of Democracy (CSD), hereinafter called “the CSD Group”, comprising also CSD’s consulting arms Vitosha Research EOOD and Project 1 EOOD. The Policy prescribes the rules and procedures designed to ensure the safety and guarantee the respect of the rights of each child whom CSD Group staff, partners, subcontractors and external experts have invited to participate in their research work. It outlines the model of behaviour these individuals should follow and the measures to be undertaken in response to claims or justified assumptions of breach of this Policy.

This Child Protection Policy is grounded in the understanding that each study involving children should seek to strike a balance between the research goals and the safety and wellbeing of the participants. The Policy is applied to all aspects of scholarly research which directly or indirectly involve children and it concerns both children and researchers. By providing the appropriate support and being aware of the right actions to be taken at the right time, researchers should be capable of ensuring that children feel respected and are able to safely participate in the research.

The Policy on Child Protection in Research Contexts is available to all interested parties (on paper after specifically requested or in electronic format downloadable from the Center for the Study of Democracy’s website).

The Procedures on Child Protection in Research Contexts are an integral part of this Policy.



The CSD Group (consisting of the Center for the Study of Democracy and its consulting arms Vitosha Research EOOD and Project 1 EOOD) has placed among its key priorities the promotion and protection of fundamental rights. The entities comprising the CSD Group have been actively involved in the establishment of the Ombudsman institution in Bulgaria and have been monitoring the extent to which fundamental rights in the country are respected, as well as doing research on the position of particularly vulnerable groups of society, such as: children, victims of crime, suspects and accused persons, prisoners, asylum seekers, and migrants.

The Center for the Study of Democracy is a not-for-profit organisation acting for the public benefit, registered in pursuance to the Law on Not-for-Profit Legal Entities, under company file No. 1092/1990 of the Sofia City Court and re-registered in the public *Commercial Register and Register of Not-for-Profit Legal Entities* under Unified Identification Code 000713046. The organisation is represented by Ognian Shentov, Chairman of the Governing Board, and is based in Sofia, at 5 Alexander Zhendov St., tel.: 02 971 3000, fax: 02 971 2233, e-mail: [csd\(at\)online\(dot\)bg](mailto:csd(at)online(dot)bg), website: [www.csd.bg](http://www.csd.bg).

Vitosha Research EOOD and Project 1 EOOD are wholly owned by the Center for the Study of Democracy. The three entities form the CSD Group.

Vitosha Research EOOD is a limited liability company specialised in a wide range of research and consulting fields: social and economic policy; assessment and evaluation studies; economic and political behaviour; political attitudes and value systems. Vitosha Research EOOD is registered in the public *Commercial Register and Register of Not-for-Profit Legal Entities* under Unified Identification Code 130281981, and has its seat at 5 Alexander Zhendov St., tel.: 02 971 3000, fax: 02 971 2233, e-mail: [office\(at\)vitosharesearch\(dot\)com](mailto:office(at)vitosharesearch(dot)com).

Project 1 EOOD is a limited liability company set up to manage the real estate investments of the CSD Group and its projects involving contract research. Project 1 EOOD is registered in the public *Commercial Register and Register of Not-for-Profit Legal Entities* under Unified Identification Code 131128180, and has its seat at 5 Alexander Zhendov St., tel.: 02 971 3000, fax: 02 971 2233, e-mail: [project1\(at\)online.bg](mailto:project1(at)online.bg).

The three organisations share facilities, as well as human and financial resources, in order to better achieve their goals and mission.

## I. DEFINITIONS

**1. Child:** Every human being below eighteen years of age.

2. **Children’s rights:**<sup>1</sup> Children enjoy in full the fundamental human rights, but their rights are specific, since children need specific care and protection. The best interest of the child is a primary consideration.
3. **Violence:** all forms of physical, mental, emotional or sexual abuse, neglect, discrimination or maltreatment, commercial or other types of exploitation that causes actual or potential harm to the life, development or dignity of the child.
4. **Child protection:** Taking all legal, administrative, social, and educational precautions for ensuring the respect for each child’s right to protection of their normal physical, intellectual, moral and social development, as well as of their rights and interests, including protection against all forms of abuse as defined in the UN *Convention on the Rights of the Child* and the relevant Bulgarian legislation.
5. **Research:**<sup>2</sup> Scholarly research productive of new knowledge and promoting technology transfer and innovations, as well as the development of natural, technical and social sciences, and the humanities; research providing solutions to major problems in the economy, education, agriculture, ecology, social processes, human resources, security, defence and healthcare. Research comprises fundamental and applied research and the dissemination of scientific results.

## II. PRINCIPLES

The CSD Group’s Policy on Child Protection in Research Contexts is based on the following values and principles, which also guide the organisations in their entire work:

1. Children are unique individuals in development, who hold rights. The wellbeing and the protection of children’s best interest are core values with a higher priority than the interests of adults or other concerned parties.
2. Children shall be respected and not subjected to any direct or indirect discrimination on the grounds of gender, ethnic origin, language, religion, beliefs, abilities, limitations, sexual

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<sup>1</sup>*Convention on the Rights of the Child* adopted by the UN General Assembly resolution 44/25 of 20 November 1989, ratified by a Decision of the Grand National Assembly of 11 April 1991 published in the State Gazette (SG) issue 32 of 23 April 1991, promulgated SG 55 of 12 July 1991, in force as of 3 July 1991.

<sup>2</sup> A per the *Law on Scientific Research Promotion*, promulgated, State Gazette issue 92 of 17 October 2003, last amended, State Gazette issue 77 of 18 September 2018.

orientation, social status, or any other grounds specified in laws or international agreements to which Bulgaria is state party

3. Children shall be informed in a manner appropriate to their age and level of development of the research they are involved in and shall be encouraged and supported to participate in all decision-making that has a direct impact on them. The children's rights shall be respected in all activities undertaken by the CSD Group.
4. The research methods used with respect to children shall follow the best practices in research ethics currently in use.
5. Every child has their strengths and the potential to grow. Research in the area of children's rights, development, and wellbeing aims to help them unfold their potential and their independence, and to support the prosperity of society as a whole.
6. The CSD Group shall ensure that openness and transparency are important elements in the decision-making process and all activities that follow, and that such actions would not bring harm to children and would be guided by respect towards children's rights.
7. All possible risks that could arise while working with children shall be minimised.

### III. ETHICAL CONDUCT

In its research work on children's issues the CSD Group shall be guided by the *Ethical Code of the Bulgarian Child Protection Agency* (<https://sacp.government.bg/en/node/1397>).

### IV. AIMS OF THE CHILD PROTECTION POLICY

This Policy considers children not only as objects of protection, but also as right holders. In this sense, the Policy and the Procedures are an important prerequisite for guaranteeing the best interest of the child.

1. **Child protection.** Creating and implementing child protection measures minimises the potential risks for harming, abusing, or exploiting children.
2. **Representatives of the organisation and external experts working on research projects related to children issues.** Implementing this Child Protection Policy aims:
  - to provide guidelines to employees and experts on the acceptable boundaries in communicating and the behaviour due while working with children;



- to help employees and experts identify potential risks, while working with children at and outside the workplace/home and report them to the competent bodies;
- to outline the possible ways in which employees and experts can act in cases of danger of abuse or misconduct towards children or in cases when children have suffered abuse or misconduct.

**3. The CSD Group.** Implementing the Child Protection Policy aims to give the Center for the Study of Democracy and its consulting arms Vitoshka Research EOOD and Project 1 EOOD clear guidelines and a framework of their commitments when working with children.

## **V. SCOPE OF THE POLICY**

This Policy concerns all employees of the CSD Group, irrespective of the type of employment agreements they work under, the members of the Group's governing bodies, all external experts and partners involved in the research projects on children issues of the Center for the Study of Democracy and its consulting arms, as well as all volunteers and interns. All persons listed are obliged to read this Policy and ascertain this by signing a specific declaration, as well as to abide by it in all their activities.



# **PROCEDURES ON CHILD PROTECTION IN RESEARCH CONTEXTS**

## I. GENERAL PROCEDURES

1. **Responsibility:** The persons responsible for implementing these rules and procedures are the CEO and the Chairman of the Governing Board of the Center for the Study of Democracy and the managers of its consulting arms.
2. **Persons concerned by the Policy:** All persons concerned by this Policy are required to:
  - 2.1. Read and adhere to the Policy and Procedures.
  - 2.2. Familiarise themselves with international and Bulgarian legal regulations relating to children's rights.
  - 2.3. Adhere to personal data protection and research information confidentiality requirements pertaining to the implementation of projects involving children.
  - 2.4. Have an understanding of the possible immediate situations that may put children at risk in the short and mid-term.
  - 2.5. Plan and organise their work and their workplace so as to reduce to a minimum the risks that children involved in research activities may face.
  - 2.6. Strive to maintain a culture of openness and trust, so that any possible problems or concerns of those involved in research activities related to children are voiced and discussed freely.
  - 2.7. Approach responsibly any potentially risky practice or behavior, so that these are corrected in a timely manner.
  - 2.8. Encourage and support children and young people in forming and sharing opinions on issues that affect them.
3. **Signals and complaints about children at risk:**
  - 3.1. All persons in the scope of this Policy are required to maintain a professional and responsible attitude pertinent to the applicable legislation towards each complaint concerning a child at risk received or if there is any doubt of such risk and/or need of protection.
  - 3.2. Any person concerned by this Policy who receives a signal about a child at risk is required to inform the Chairman/Executive Director or another authorised person within 24 hours of receipt, and, following the formal procedures, to notify the competent law-enforcement agencies and the relevant child protection bodies.



- 3.3. Any person within the scope of this Policy is required to report each suspected case of a child in need of protection to the Social Assistance Directorate, the State Agency for Child Protection or the Ministry of Interior.
- 3.4. When a person within the scope of this Policy is the alleged perpetrator of child abuse or violence against a child, punitive measures shall be imposed on that person, which may be followed by administrative or criminal liability measures.
- 3.5. For any other violations of these Procedures, disciplinary measures shall be taken against the person who made them.
4. **Trainings:** Employees at the CSD Group, as well as all other persons within the scope of this Policy, are required to pass an initial training on the Policy and Procedures for working with children as well as receive annual follow-up briefings on any updates thereto. The trainings are conducted by an internal expert on policies and procedures for working with children.
5. **Monitoring:** This Policy and the Procedures to it shall be updated, adapted and expanded every three years or more often, as necessitated by the changes in context or any identified additional needs of stakeholders.

  - 5.1. Within the same timeframe, the Executive Director shall provide the CSD General Assembly information about how this Policy has been implemented in the operational activities of the Center. The Executive Director and the managers of the CSD consulting arms shall immediately notify the Governing Board of any breach of this Policy. Based on the information presented, the CSD Governing Board shall decide on a course of action on the shortest possible notice.
  - 5.2. The implementation of the Policy shall be presented publicly in the CSD Annual Report, should the Governing Board consider it relevant.
6. **Recruitment:** Following each recruitment procedure of regular staff or external experts hired to perform particular activities, each new appointee shall sign, before his first working day or the first day of the service contract respectively, a declaration confirming their familiarity with and consent to act in accordance with the present Child Protection Policy and Procedures. The CSD Executive Director or respective company manager shall nominate a staff member who shall train the new employee or external expert on the content of the Child Protection Policy and Procedures.



## **II. CAPTURING AND PUBLICATION OF IMAGES AND VIDEOS**

1. With regard to capturing and publishing photographs and videos of children, including on the Internet and during video streaming, CSD Group employees shall be guided by the Group's principles for working with children laid down in this Policy and by standards applicable to child consent in relation to information society services.
  - 1.1. All children filmed or photographed must be properly dressed in accordance with ethical standards. If a more casual look for the children is needed, photos and videos should be carefully selected.
  - 1.2. Preferably, the recorded content should reflect an activity and, if possible, groups of children rather than individual children should be filmed or taken photographs of.
  - 1.3. All signals or complaints concerning images and videos shall be recorded and documented as are other types of signals about child abuse.
2. When children are filmed or photographed, informed consent by the parent/guardian/custodian and by the child, when over 14 years of age, shall be obtained prior to the photographing or film footage. Such informed consent shall be certified by their signing of a declaration of informed consent.
3. When large groups of children are filmed or photographed and it is not possible to obtain informed consent, the following shall be taken into account: 1) Where the image or video is captured – whether in a public place or elsewhere. 2) If there has been prior notification of the intent to film or photograph during the event. 3) If there is no specific need to identify a child featured in a video or image and if no written consent is given by a parent/guardian/custodian and by the child, when over 14 years of age, the children photographed or filmed shall not be identified by any personal data.
4. Identifying children when publishing textual materials to report upcoming or completed activities shall also be avoided, unless absolutely necessary and under the condition that written informed consent by the parent/guardian/custodian and by the child, when over 14 years of age, has been obtained.
5. All complaints and signals about videos or images shall be processed as outlined in Item 3 of Section I – General Procedures.

### III. EVENT-RELATED PROCEDURES

1. Prior to performing activities that directly engage children, it shall be mandatory to obtain informed consent declarations signed by the parent/guardian/custodian and such signed by the children, when over 14 years of age. Children and parents/guardians/custodians shall be informed by the coordinator of the activities what their responsibilities are and what they could expect from the CSD Group and its member entities. Such information shall be present at the earliest stage, when the children are first invited to a particular event.
2. All partners or contractors involved in organising joint events with the CSD Group are required to familiarise themselves and state in a written form their adherence to these Child Protection Procedures.
3. The physical space where an activity or event is conducted shall always be arranged so, as to comply with health and safety requirements for working with children.
4. **Risk assessment/risk prevention and mitigation.** The Center for the Study of Democracy, the other CSD Group entities and all persons within the scope of this Policy shall carry out a risk assessment of all their operations, programmes, projects, and activities. Such assessments shall always be taken into account, all risks that might arise while working with children shall be identified, and the prevention and mitigation of those risks shall be planned.

### IV. PERSONAL DATA COLLECTION, MANAGEMENT AND STORAGE

1. In their research activities, the CSD Group employees and experts shall be bound to comply to the legal provisions on data protection (*Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data*, as well as the applicable Bulgarian legislation in the areas of data protection and child protection), and to respect children's honour, dignity and personality. CSD Group's *Personal Data Protection and Privacy Policy* (<https://csd.bg/footer-menu/privacy/>) shall apply to all issues relating to personal data processing, security measures and storage, as well as to the rights of data subjects.
2. Personal and contact information of children shall not be collected, except with respect to specific future activities and conditions expressly agreed on with the children's

parents/guardians/custodians. Information and data about the person of a child<sup>3</sup> obtained in the course of activities, shall not be made public without prior consent by the parents or the child's legal representatives (and also the child, when over 14 years of age), except in the cases laid down in Items 3.2. and 3.3 of Section I of these Procedures.

3. All documents containing personal data shall be collected and stored in compliance with the legal provisions specified in Item 1 of this Section.
4. All collected personal data of children are confidential and shall be destroyed immediately after elimination of the need for their preservation.
5. The number of employees who have access to the personal data and contact information of children is limited to the minimum that is practically necessary for carrying out the activities.
6. **Communication with children and young people in social networks:** Communication with children and youth who participate in activities organised by CSD and its consulting arms in social networks/media is maintained only through hidden groups (Closed/Secret Groups). Members of these groups are approved and closely monitored by a designated group administrator who shall grant access to the group to none other than children and young people who need to be informed on a particular subject and adults whom the young people know and who are concerned by the respective topic. Group administrators and other persons within the scope of this Policy shall not accept friendship requests from the children and young people who are members of the groups. Adults admitted to that group shall also be informed about this rule.

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<sup>3</sup> Information and data about a "child" means any information relating to the child, as defined in Art. 4, Item 1 of *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April (General Data Protection Regulation)* and §1, Item 2 of the *Bulgarian Law on Child Protection*.



# ANNEXES

1. Declaration on familiarity and compliance with the CSD Group's Policy on Child Protection in Research Contexts (Annex 1A and 1B).
2. Declaration on received training related to the CSD Group's Policy on Child Protection in Research Contexts (Annex 2A and 2B).
3. Child consent form for children over 14 years of age (Annex 3).
4. Parental consent form concerning a child's participation in an activity and/or use of images/video content involving the child (Annex 4).



## DECLARATION

by .....  
(full name)

employee/member of governing body of the Center for the Study of Democracy/Project 1 EOOD /Vitosha Research EOOD (*strike out the options that do not apply to you*), position:  
.....

I hereby declare

that I am familiar with the Policy and Procedures on Child Protection in Research Contexts of the CSD Group (the Center for the Study of Democracy and its consulting arms Project 1 EOOD and Vitosha Research EOOD), applied as of 12.01.2021, and I agree to comply with the requirements, rules and guidelines therein, as well as with the relevant Bulgarian legislation in force.

Declarant: .....  
(Signature)

Date: .....



CENTER FOR THE STUDY OF DEMOCRACY

DECLARATION

by..... (full name)

expert/intern/volunteer (strike out the options that do not apply to you) of the Center for the Study of Democracy/Project 1 EOOD /Vitoshka Research EOOD (strike out the options that do not apply to you)

Address: .....

Phone: .....

E-mail: .....

I hereby declare

that I am familiar with the Policy and Procedures on Child Protection in Research Contexts of the CSD Group (the Center for the Study of Democracy and its consulting arms Project 1 EOOD and Vitoshka Research EOOD), applied as of 12.01.2021, and I agree to comply with the requirements, rules and guidelines therein, as well as with the relevant Bulgarian legislation in force.

I consent for the entities forming the CSD Group to collect, store and process my personal data for project implementation and reporting purposes under grant or service contracts with the European Commission or other donors/contracting authorities, including Bulgarian public institutions and private organisations, which these entities are executing independently or jointly with other partners.

Declarant: ..... (Signature)

Date: .....



## DECLARATION

by .....  
(full name)

employee/member of governing body of the Center for the Study of Democracy/Project 1 EOOD /Vitosha Research EOOD (*strike out the options that do not apply to you*), position: .....

I hereby declare

that I have received training related to the Policy and Procedures on Child Protection in Research Contexts of the CSD Group (the Center for the Study of Democracy and its consulting arms Project 1 EOOD and Vitosha Research EOOD), applied as of 12.01.2021, and I agree to comply with the requirements, rules and guidelines therein, as well as with the relevant Bulgarian legislation in force.

Declarant: .....  
(Signature)

Date: .....



CENTER FOR THE STUDY OF DEMOCRACY

DECLARATION

by..... (full name)

expert/intern/volunteer (strike out the options that do not apply to you) of the Center for the Study of Democracy/Project 1 EOOD /Vitoshka Research EOOD (strike out the options that do not apply to you)

Address: .....

Phone: .....

E-mail: .....

I hereby declare

that I am familiar with the Policy and Procedures on Child Protection in Research Contexts of the CSD Group (the Center for the Study of Democracy and its consulting arms Project 1 EOOD and Vitoshka Research EOOD), applied as of 12.01.2021, and I agree to comply with the requirements, rules and guidelines therein, as well as with the relevant Bulgarian legislation in force.

I consent for the entities forming the CSD Group to collect, store and process my personal data for project implementation and reporting purposes under grant or service contracts with the European Commission or other donors/contracting authorities, including Bulgarian public institutions and private organisations, which these entities are executing independently or jointly with other partners.

Declarant: ..... (Signature)

Date: .....



### Informed Consent

This Informed Consent Declaration is intended to guarantee that the rights of the participants during .....  
 (name of activity or event), organised by the Center for the Study of Democracy/Project 1 EOOD /Vitosha Research EOOD (strike out the options that do not apply) shall be respected. Your contribution will be treated as strictly confidential.

### DECLARATION

.....  
 /full name of declarant/

.....  
 /class, school, city /

By signing below I declare that I have been informed and I give my consent to take part in:  
 .....  
 .....  
 organised by the Center for the Study of Democracy/Project 1 EOOD /Vitosha Research EOOD (strike out the options that do not apply).

Declarant: .....  
 (Signature)

Date: .....



### Informed Consent

This Informed Consent Declaration is intended to guarantee that the rights of children and their parents/guardians/custodians during

.....  
(name of activity or event), organised by the Center for the Study of Democracy/Project 1 EOOD /Vitoshka Research EOOD (strike out the options that do not apply) shall be respected. Your contribution will be treated as strictly confidential.

### DECLARATION

by .....  
/full name of declarant/

parent/guardian of  
.....  
/ full name of child, class, school, city /

Basic information about the parent/guardian/custodian:

Phone: .....

E-mail: .....

I hereby declare that I have been informed and I give my consent for my child to take part in:  
.....  
.....,  
(name of event or activity and date held) organised by the Center for the Study of Democracy/Project 1 EOOD /Vitoshka Research EOOD (strike out the options that do not apply). I agree/don't agree (strike out the option that does not apply to you) that my child is photographed or filmed for the purposes of this particular event or for the purpose of promoting the organiser's activities.

By signing below I am indicating my consent for the Center for the Study of Democracy/Project 1 EOOD /Vitoshka Research EOOD (strike out the options that do not apply) to process my personal data shared in relation with my child's participation in the event and for reporting purposes, in strict pursuance to the General Data Protection Regulation. I declare that I have been informed of the option to withdraw this consent at any time by completing a standard consent withdrawal form.

Declarant: .....

Date: .....

(Signature)