DESATERO P+ · SPECIAL ANNEX

Child Protection in P+

Child Protection Policy · Politika ochrany dětí

Prostor plus o.p.s.

	Date / person
Prepared by	P+ Senior Management Team
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This document has been drawn up as a special annex to DESATERO P+ rather than as a separate numbered directive. It builds on the organisation's published documents: the Methodology for Handling Situations Falling under the Social and Legal Protection of Children (SPOD), DESATERO P+ – Directive 04 Complaints in P+, Directive 05 Culture and Values of P+, Directive 06 Ethical Conduct in P+, the Personal Data Protection and Processing Principles, the methodologies of the low-threshold youth clubs (NZDM) and the documents on the Lehkost approach.

Policy at a Glance ... 3
Part A – POLICY ... 4
1. Statement of Commitment ... 4
2. Purpose and Scope ... 4
3. Definitions ... 5
4. Principles ... 5
5. Legal and Methodological Framework ... 6
Part B – PEOPLE ... 7
6. Roles and Responsibilities ... 7
7. Safe Recruitment and Selection ... 7
8. Vetting ... 8
9. Code of Conduct ... 8
10. Staff Training and Support ... 9
Part C – PROCEDURES ... 11
11. Risk Assessment and Management ... 11
12. Responding to Concerns and Disclosures ... 11
13. Allegations against Staff or Volunteers ... 12
14. Child-Friendly Complaints and Feedback ... 13
15. Data Protection and Confidentiality ... 13
16. Online Safety ... 13
17. Child Participation ... 14
18. Partners, Contractors and Projects ... 14
Part D – ACCOUNTABILITY ... 15
19. Monitoring and Record-Keeping ... 15
20. Policy Review ... 15
21. Publication and Communication of the Policy ... 15
Final Provisions ... 15
Annexes ... 16
Annex 1: Code of Conduct – Staff Declaration ... 16
Annex 2: Concern / Disclosure Record Form ... 16
Annex 3: Flowchart for Responding to a Child Safety Concern ... 17
Annex 4: Activity Risk Assessment Form ... 17
Annex 5: Contacts ... 17
Annex 6: Consent to Taking and Publishing Photographs and Videos ... 18
Annex 7: Child-Friendly Version – “You Are Safe Here” ... 18
Annex 8: English Summary – Child Protection Policy of Prostor plus o.p.s. ... 20
Annex 9: Model Child Protection Contract Clause ... 20

Policy at a Glance

This Child Protection Policy of Prostor plus o.p.s. (hereinafter “P+”) is a special annex to DESATERO P+. It sets out how P+ prevents children with whom it comes into contact from suffering any harm, and how it responds when a concern about a child’s safety arises. It has been developed in line with the Keeping Children Safe standards and is binding on everyone who works for or with P+.

What you will find in this policy and which questions it answers:

- Part A – Policy: what P+ commits to, to whom and to what the policy applies, what we mean by violence against children, and the principles on which we base our work.
- Part B – People: who is responsible for child protection, how we select and vet staff and volunteers, how we behave towards children and how we train.
- Part C – Procedures: how we assess risks, what to do when there is a concern or a child makes a disclosure, how to proceed when a concern relates to a member of staff, how children can make a complaint, how we protect data, and how we work online and with partners.
- Part D – Accountability: how we monitor, evaluate and update child protection within the organisation and how we publish the policy.
- Annexes: code of conduct for signature, record form, flowchart, risk assessment, contacts, photo consent, child-friendly version, English summary.

Key rules at a glance

Not sure? Always consult the Child Protection Focal Point or the service manager.

Is the child in immediate danger? Call 112 (or 158 or 155) first, and only then inform the Focal Point.

Never keep a concern to yourself and never investigate it on your own.

Never promise a child that you will not tell anyone – promise them that you will help.

Part A – POLICY

1. Statement of Commitment

P+ provides social services, education, community and therapeutic programmes in the Central Bohemian Region (mainly in the Kolín, Kutná Hora and Poděbrady areas), the Pardubice Region and Prague. We work with children and young people in low-threshold facilities, in work with families, in our asylum house, in children's groups, at our summer day camp, in primary prevention, in schools through the Early Intervention Teams and the Lehkost approach, and in outreach work. Many of these children are in difficult life circumstances – experiencing poverty, housing need, domestic violence, or problems in the family or at school.

For precisely this reason, P+ commits to:

- tolerate no form of violence, abuse, exploitation or neglect of children – whether by its staff, volunteers, partners or any other persons;
- put the best interests of the child first in all decisions concerning children;
- actively prevent risks, recognise warning signs early and act without undue delay;
- take every concern or report seriously and protect those who raise them in good faith;
- listen to children, involve them in matters that affect them and respect their views in accordance with their age and maturity;
- ensure that everyone who works for P+ knows this policy and is able to act in accordance with it;
- regularly evaluate whether child protection within the organisation is effective and improve the policy accordingly.

This commitment builds on the values of P+ set out in Directive 05 Culture and Values of P+, in particular the principle that we build relationships on trust, not fear, and that we hold both the frame and the space. For us, children's safety is a frame that is not open to negotiation.

On behalf of Prostor plus o.p.s.: …… Mgr. Petr Steklý, Director Date: 1 June 2026

2. Purpose and Scope

2.1 Purpose

The purpose of this policy is to protect children with whom P+ comes into direct or indirect contact, and to give all staff clear rules on how to behave, how to prevent risks and how to proceed when a concern about a child's safety arises.

2.2 To whom the policy applies

- all employees of P+ regardless of position or working time, including those working under agreements to perform work (DPP, DPČ) and staff who do not ordinarily come into contact with children (administration, facilities management, IT, PR);
- volunteers, interns and trainees;
- members of the Board of Directors and the Senior Management Team;
- external associates, trainers, supervisors, therapists, contractors and other persons involved in activities with children;
- partner organisations in projects in which P+ acts as coordinator or partner, to the extent set out in Chapter 18;
- visitors and guests at activities, to the extent of the on-site rules of conduct.

Unless otherwise stated, this policy uses the term "staff" collectively for all the persons listed above.

2.3 To which activities the policy applies

The policy applies to all activities of P+, namely:

- registered social services (in particular the low-threshold youth clubs Kotelna and Kolárka, social activation services for families with children in Kolín and Kutná Hora, the asylum house, outreach programmes, the drop-in centre and specialist counselling);
- programmes for foster families, the multidisciplinary team, and projects and programmes for families and adolescents;

- children's groups and the summer day camp;
- primary prevention and school-based programmes, including the Early Intervention Teams (which include care and support workers) and the Lehkost approach;
- community work, events, trips, transport of children and residential activities;
- the online environment: the Lehkost.cz platform, social media, e-mail, telephone, chat and any other form of electronic communication.

2.4 Relationship to other internal regulations

In matters of child protection, this policy takes precedence over the methodologies of individual services. Service methodologies (in particular the Methodology for Handling Situations Falling under the Social and Legal Protection of Children for Social Services) govern specific procedures within each service and must be consistent with this policy. The policy further builds on Directive 04 Complaints in P+ (including the Internal Whistleblowing System), Directive 06 Ethical Conduct in P+, the Personal Data Protection and Processing Principles, the Work Rules and the Human Resources Management Directive.

3. Definitions

Term	Meaning
Child	Any person under the age of 18, in accordance with Article 1 of the UN Convention on the Rights of the Child.
Child protection	Measures and procedures through which we respond to situations where a child is at risk or has been harmed.
Safeguarding	The broader duty of an organisation to ensure that its staff, activities and programmes do not harm children or expose them to risk.
Concern / suspicion	Any information, observation or feeling that a child is or may be at risk – it need not be verified or substantiated.
Disclosure	A situation in which a child, or another person, tells a member of staff about violence or a risk to a child.
Focal Point	The designated child protection person in P+ (see Chapter 6).

In accordance with Article 19 of the UN Convention on the Rights of the Child, violence against children means all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse – whether it occurs offline or online. This includes in particular:

- physical abuse – hitting, kicking, burning, shaking, corporal punishment and other intentional harm;
- emotional abuse – humiliation, intimidation, threats, isolation, withholding of affection, ridicule, repeated psychological pressure;
- sexual abuse – any sexual contact with a child or involvement of a child in sexual activities, including non-contact forms (showing pornography, making intimate images, grooming); in the case of a child under 15, this applies even where it occurred "voluntarily";
- neglect – persistent failure to meet a child's basic needs (nutrition, hygiene, clothing, health care, safety, education, emotional care);
- exploitation – forced labour, begging, criminal activity, child trafficking;
- online violence – cyberbullying, grooming, sextortion, sharing of intimate or manipulated images (including deepfakes), online threats and blackmail;
- bullying and peer-on-peer violence – physical and psychological, at school, in a facility, during leisure time and online;
- children witnessing domestic violence – a child who is present when violence occurs between persons close to them is always regarded as a victim;
- endangering moral development – e.g. use of addictive substances in front of a child, involving a child in criminal activity.

A more detailed list of situations encountered in social services, including situations in which a child harms themselves or others, is contained in the Methodology for Handling Situations Falling under the Social and Legal Protection of Children for Social Services.

4. Principles

- **Best interests of the child.** In all decisions concerning a child, the child's interests take precedence over those of the organisation, the staff member and adult clients.
- **Right to be heard.** A child has the right to express their views on all matters affecting them. We give their views due weight in accordance with their age and maturity. A child over the age of 12 is presumed to be capable of receiving information, forming their own views and expressing them.
- **Shared responsibility.** Child protection is not the task of one person. Every member of staff has a duty to act when they have a concern about a child's safety.
- **Non-discrimination and inclusion.** We protect all children regardless of sex, gender identity, age, ethnic origin, religion, health, disability, sexual orientation or the social and economic situation of their family (in line with Directive 06 and the P+ Gender Policy Strategy).
- **Heightened attention to children in vulnerable situations.** We pay particular attention to children from homes affected by domestic violence and housing need, children in alternative family care, children with disabilities, Roma children, children of foreign nationals and children with mental health difficulties.
- **Trauma-informed approach.** We know that many of the children we work with have experienced traumatic events. We act in a way that avoids re-traumatising them – we do not question them repeatedly, we do not apply pressure, and we give the child a sense of control and safety.
- **Confidentiality with clear limits.** Confidentiality is the foundation of trust, but it never takes precedence over a child's safety. We explain the limits of confidentiality to children in a way they can understand.
- **Working with families.** Parents and carers are our partners. The exception is situations in which informing them could put the child at further risk.
- **Multi-agency cooperation.** We ensure child protection in cooperation with the child protection authority (OSPOD), schools, health services, the Police of the Czech Republic and other services. When sharing information, we follow Chapter 15.

5. Legal and Methodological Framework

The policy is based in particular on the following legislation and standards:

- the UN Convention on the Rights of the Child (in particular Articles 3, 12 and 19) and the Charter of Fundamental Rights of the European Union (Article 24);
- the Czech Charter of Fundamental Rights and Freedoms;
- Act No. 359/1999 Coll., on the Social and Legal Protection of Children, in particular the obligation to notify OSPOD of facts indicating that a child is at risk;
- Act No. 40/2009 Coll., the Criminal Code, in particular the obligation to prevent or report certain criminal offences (Sections 367 and 368), which include, for example, maltreatment of a person in one's care;
- Act No. 108/2006 Coll., on Social Services, and the Social Services Quality Standards;
- Act No. 247/2014 Coll., on Children's Groups (for P+ children's groups);
- Act No. 171/2023 Coll., on the Protection of Whistleblowers;
- Regulation (EU) 2016/679 (GDPR) and Act No. 110/2019 Coll., on the Processing of Personal Data;
- the European Commission Recommendation on developing and strengthening integrated child protection systems (2024);
- the Keeping Children Safe – Child Safeguarding Standards;
- the Code of Ethics of Social Workers of the Czech Republic.

Part B – PEOPLE

6. Roles and Responsibilities

Who	Responsibility
Board of Directors	Overall responsibility for child protection in P+. Reviews the annual child protection report. Deals with allegations concerning the Director.
Director / Senior Management Team	Approves the policy and provides resources for its implementation (time, training, supervision). Appoints the Focal Point. Decides on employment-law measures.
Child Protection Focal Point	Receives concerns and reports and provides consultation. Decides on next steps in cooperation with the service manager. Communicates with OSPOD and the Police of the Czech Republic. Maintains the central record. Coordinates training. Prepares the annual report and input for the policy review.
Deputy Focal Point	Stands in for the Focal Point during their absence with full authority.
Section heads and service managers	Ensure that staff know the policy and complete training. Are responsible for activity risk assessments and for ensuring that service methodologies are consistent with the policy. Inform the Focal Point of every concern.
Every member of staff	Knows the policy and signs the code of conduct. Acts in accordance with it. Passes on concerns without delay. Takes part in training.
HR Officer	Ensures safe recruitment and vetting. Keeps records of signed codes of conduct, submitted criminal record certificates and completed training. In P+, this role is also held by the Child Protection Focal Point.

Child Protection Focal Point: Ing. Tereza Nováková, HR Officer

Deputy: Ing. Kateřina Kvapilová, HR Administrator

Contact details are provided in Annex 5, displayed in every facility and published on the website. The Focal Point and Deputy roles are expressly included in their job descriptions. The Focal Point has dedicated time to perform the role and completes specialist training (Chapter 10). The Focal Point is responsible for implementing Part D of this policy. The Focal Point and the Deputy always work in close cooperation with the manager of the relevant service or programme or, where applicable, the project coordinator, and make assessments and decisions on next steps under Chapter 12 jointly with them (unless Chapter 13 provides otherwise). Before any planned absence, the Focal Point informs the Deputy and hands over an overview of open cases; on return, the Focal Point takes them back. Each handover is recorded in the central record.

7. Safe Recruitment and Selection

Safe recruitment is the first and most important safeguard for children. It applies to employees, staff on agreements to perform work, volunteers, interns and external associates who have contact with children. The HR Officer, in cooperation with the manager of the relevant service, is responsible for setting up and complying with the recruitment procedure.

7.1 Recruitment procedure

1. Position assessment: before advertising a position, the manager determines the level of contact with children – direct regular contact, occasional contact or no contact. Vetting and training requirements are set accordingly.
2. The job advertisement and job description state that P+ has a child protection policy and that a criminal record check forms part of the selection process.

3. Interviews for positions involving contact with children include questions on child protection, boundaries and motivation for working with children (e.g. “How would you respond if a child told you they were being hurt at home?”, “Where do you see the boundaries in a relationship with a client?”).
4. References: we check at least two references, at least one of which comes from the most recent employer or from previous work with children. We also ask about suitability for working with children.
5. Verification of identity, qualifications and experience in accordance with the statutory requirements for the position.
6. Familiarisation with the policy and signing of the code of conduct (Annex 1) before starting work with children.
7. Probationary period and induction: a new member of staff works with children under the supervision of an experienced colleague until the manager confirms that they can work independently.

7.2 Volunteers and interns

- Volunteers and interns go through the same procedure as employees to the extent appropriate to their role. Interns are accepted on the basis of an agreement with the sending institution and sign a confidentiality undertaking.
- We vet motivation, particularly in the case of former service users. We discuss the conditions and emphasise boundaries and ethics. Before starting, they receive the code of ethics, this policy and the service methodology for study.
- A volunteer or intern is always accompanied by a member of staff while in the facility. They never work with a child on their own and have a clearly defined scope of activities. They have a designated key worker for consultation.
- Volunteers and interns have no access to children’s individual plans or personal records.

8. Vetting

- A criminal record certificate (extract from the Czech Criminal Register) must be submitted before starting work by all persons who will have direct or occasional contact with children: employees, staff on agreements to perform work, volunteers, interns and external trainers. The certificate must not be older than 3 months. It is received and checked by the HR Officer. No person may be admitted to work with children without having submitted the certificate.
- For positions where the law requires a clean criminal record (e.g. social worker, social care worker, carer in a children’s group), the relevant legislation applies.
- Repeat vetting: the certificate is renewed every 3 years and whenever reasonable doubt arises. The HR Officer gives notice of the renewal date.
- Foreign nationals and persons who have lived abroad in recent years also submit a criminal record certificate from their country of origin or residence. Where this cannot be obtained, they submit a sworn statement, and the decision on recruitment is made by the service manager after consultation with the Focal Point.
- If the certificate contains an entry, the Director, in cooperation with the HR Officer (Focal Point) and the manager of the relevant service, assesses whether the entry is compatible with work with children. Offences against life and health, against human dignity in the sexual sphere, against the family and children, and violent offences are incompatible with work with children.
- Members of staff must inform management without delay of the commencement of criminal proceedings against them or of any other fact that could call into question their suitability to work with children.
- The certificate is not copied and is not retained for longer than necessary. The HR Officer records only the date of submission and the outcome (in accordance with Chapter 15).

9. Code of Conduct

The code of conduct puts Directive 06 Ethical Conduct in P+ into concrete terms for work with children. Every member of staff signs it before starting work (Annex 1). A breach of the code constitutes a breach of employment duties.

9.1 Always

- I treat every child with respect, kindness and equality and show no favouritism;
- I maintain professional boundaries and reflect on my position of power in team meetings and supervision;
- wherever possible, I work with children where other adults can see or hear me (open doors, glazed rooms, shared spaces);
- I hold one-to-one conversations or counselling with a child in a room and at a time known to a colleague or manager;
- I communicate with children only through work channels (work phone, work accounts) and during the service's operating hours;
- I respect the child's right to say "no" – including to physical contact, being photographed and taking part in an activity;
- I use age-appropriate language, without profanity or stigmatising or hurtful expressions;
- I immediately report any concern about a child's safety using the procedure in Chapter 12;
- I report any conduct by a colleague that breaches this code.

9.2 Never

- I never use corporal punishment, humiliation, intimidation or any other form of violence against a child;
- I never enter into a romantic or sexual relationship with a child, never make sexually suggestive remarks, jokes or gestures, and never expose a child to sexual content;
- I never remain alone with a child outside an observable setting, never drive a child in a private vehicle without the manager's knowledge, and never invite a child to my home;
- I never add children or their parents to my private social media accounts and never communicate with them privately;
- I never take photographs or videos of children on a private device and never publish them without consent (Chapter 15);
- I never accept gifts or favours from children or their families and never give personal gifts to individual children (small refreshments are permitted for the whole group only);
- I never give children alcohol, tobacco or other addictive substances, never work under their influence and never smoke in the presence of children;
- I never promise a child that I will keep information about a risk to myself;
- I never investigate a concern on my own and never confront the alleged perpetrator.

9.3 Physical contact

Physical contact is acceptable only where it is appropriate to the child's age and needs, is public and brief, and the child consents to it. Examples include a handshake, a "high five" or comforting a crying young child in a children's group. Hygiene care for young children in children's groups follows the operating rules of the children's group. Physical intervention to prevent harm (e.g. during a fight) is permitted only to the extent strictly necessary and must always be recorded as an incident.

9.4 Trips, transport and overnight stays

- Trips and residential events are approved by the service manager on the basis of a risk assessment (Chapter 11). At least two adult staff members must take part, ideally of both sexes where the group is mixed.
- Staff do not sleep in the same room as children, except in a pre-approved situation where at least two adults are present.
- Participation in an event requires the informed consent of the legal guardian and, in the case of adolescents, the consent of the child as well.
- Children are transported in a service vehicle or with the consent of the manager and the legal guardian. Wherever possible, transport is provided by two adults.

10. Staff Training and Support

Who	When	Content
All staff, volunteers and interns	within 1 month of starting, and always before working independently with children	Introduction to the policy and the code of conduct. Forms of violence and warning signs. How to respond to a disclosure. Reporting procedure. Online safety. Data protection.

All staff in contact with children	once a year	Refresher training, case reviews and policy updates, work with simulated scenarios.
Focal Point and Deputy	on appointment and on an ongoing basis	Specialist child protection course, crisis intervention, SPOD legislation, conducting investigations.
Service managers	on taking up the post and once a year	Risk assessment, handling allegations against staff, safe recruitment.
Staff working in the online environment	on starting	Safe online communication, grooming and cyberbullying, working with the Lehkost platform.

- The HR Officer includes the training set out in the table in the staff training plan and records its completion; the content of the training is guaranteed by the Focal Point. Failure to complete induction training precludes independent work with children.
- Child protection topics are regularly raised in team meetings, peer supervision and supervision. Staff are required to bring any doubts about their own approach to a client to a team meeting or supervision.
- After a difficult situation (a child's disclosure, a report, an incident), a member of staff is entitled to support – a conversation with their manager, ad hoc supervision or crisis intervention.

Part C – PROCEDURES

11. Risk Assessment and Management

We assess risks to children in advance, not after something has happened. Risk assessments (Annex 4) are prepared by the service manager or the person responsible for the activity:

- for every standing service and programme – when this policy is introduced and thereafter at every review of the methodology, at least once a year;
- for every new activity, project, event, trip, residential stay or new online service – before it starts;
- after every serious incident.

The following areas in particular are assessed:

- premises – visibility, the possibility of being alone with a child, access by unauthorised persons;
- staffing – number of adults, qualifications, experience, involvement of volunteers;
- target group – age, vulnerability, specific needs of the children;
- online elements – communication, data collection, photographs and videos;
- partners – who else works with the children;
- specific risks – e.g. contact with a person who poses a danger to the child (domestic violence in the asylum house, a court-ordered contact ban), disclosure of the child's whereabouts.

For each risk, the likelihood, impact, mitigation measures and responsible person are recorded. The assessment is approved by the section head and kept by the Focal Point.

12. Responding to Concerns and Disclosures

12.1 When a child makes a disclosure

- Stay calm, listen and believe the child. Reassure them that they did the right thing by telling you and that it is not their fault.
- Do not ask leading or repeated questions and do not investigate. It is enough to establish what is necessary for the child's safety. The details are established by the competent authorities.
- Do not promise confidentiality. Explain to the child in a way they can understand that you have to pass the information on to someone who will help them, and what will happen next.
- As soon as possible, write down factually what the child said – in their own words wherever possible – and when, where and in what circumstances. Also record what you observed. Do not add your own interpretations (Annex 2).

12.2 Step-by-step procedure

Step	What	How and when
1	Ensure the child's safety	If there is immediate danger, call 112 (158, 155) and stay with the child. Do not return the child to an environment where they face serious harm without consulting OSPOD or the Police of the Czech Republic.
2	Record	Complete the record form on the same day (Annex 2).
3	Pass on	Without undue delay, and within 24 hours at the latest, inform the Focal Point or the Deputy and the service manager. If the concern relates to any of them, follow Chapter 13.
4	Assess	The Focal Point (or the Deputy), together with the manager of the service or programme or, where applicable, the project coordinator (and the team as needed), assesses the situation and decides on next steps. The decision is recorded.
5	Report	Where abuse, sexual abuse, exploitation, neglect endangering the child's life or development, or a criminal offence is suspected, OSPOD in the child's place of residence, or the Police of the Czech Republic, is always notified without delay. The report is made on behalf of the programme, not of an individual member of staff. All other situations are handled in accordance with the SPOD Methodology.
6	Support	The member of staff continues to work with and support the child where this is in the child's interests. The child and family are linked up with

		follow-on services as needed (multidisciplinary team, psychologist, specialist victim support).
7	Close and review	The Focal Point closes the record, reviews the response with the team and files the documentation (Chapter 15).

The flowchart is set out in Annex 3 and is displayed in every facility.

12.3 Relationship to the SPOD Methodology

For certain situations (e.g. truancy or experimentation with addictive substances), the SPOD Methodology allows staff first to work with the child and encourage them to report the situation themselves, within a fixed evaluation period. This option remains in place. However:

- abuse, sexual abuse and situations posing an immediate threat to a child's life and health are always reported, and immediately;
- every concern about a child's safety is passed on to the Focal Point, even where it is decided to continue working with the child without making a report;
- information does not need to be verified before a concern is passed on to the Focal Point. Verification and investigation are the task of OSPOD and the Police of the Czech Republic, not of the member of staff;
- any concern relating to a member of staff, volunteer or partner of P+ is always dealt with under Chapter 13.

12.4 When the Focal Point is not available

Pass the concern on to the Deputy Focal Point, the section head or the Director. If none of them can be reached and the child is at risk of harm, contact OSPOD directly (during office hours) or the Police of the Czech Republic (158), and inform management afterwards.

12.5 Protection of persons raising concerns

Anyone who raises a concern in good faith must not suffer any detriment, even if the concern is not substantiated. The protection of whistleblowers is governed by Directive 04 and the Internal Whistleblowing System.

13. Allegations against Staff or Volunteers

Any allegation that a member of staff, volunteer, intern or partner of P+ has harmed a child, breached the code of conduct or poses a risk to children is handled separately from ordinary complaints and with the highest priority.

1. Where to report: to the Focal Point or the Director. If the allegation concerns the Focal Point, it is reported to the Director. If it concerns the Director, it is reported to the Chair of the Board of Directors. The Internal Whistleblowing System may also be used, including for anonymous reports.
2. Immediate measures: the Director (or the Chair of the Board) decides without delay on the temporary removal of the person concerned from contact with children for the duration of the investigation, e.g. by reassignment to other work. This is neither a sanction nor a presumption of guilt.
3. Law enforcement authorities: where the allegation indicates a criminal offence, P+ reports it to the Police of the Czech Republic and OSPOD. The organisation's own investigation must not interfere with the police investigation – the procedure is coordinated with the police.
4. The internal investigation is led by a person with no conflict of interest. It is impartial and confidential. The person concerned has the right to respond to the allegation.
5. Consequences: a proven breach is dealt with under the Work Rules and the Labour Code, up to and including termination of employment or cooperation. In the case of volunteers and interns, cooperation is terminated.
6. Support: we offer support to the child and their family. Support is also provided to the team dealing with the situation.
7. Informing donors: where the allegation concerns a project funded from public sources, P+ informs the funder in accordance with the contractual conditions (e.g. the European Commission for projects under the CERV programme).
8. Review: once the case is closed, it is assessed whether the situation could have been prevented, and procedures are adjusted accordingly.

14. Child-Friendly Complaints and Feedback

Children and their parents have the right to complain and to raise anything that worries them. Client complaints are governed by the service methodologies and the Rules for Submitting Complaints about the Quality or Manner of Social Service Provision. This policy supplements them with child-friendly elements:

- A child can make a complaint or raise a concern in several ways: verbally to any member of staff, via the complaints box or message book in the facility, by e-mail, through the form on the website, or anonymously.
- A child-friendly version of the policy (Annex 7) is displayed in every facility where we work with children. It sets out whom children can turn to, the contact details of the Focal Point and the Linka bezpečí child helpline 116 111.
- Staff inform children about how to complain in an understandable and age-appropriate way at the start of their involvement with the service and on an ongoing basis.
- A complaint indicating a risk to a child or misconduct by a member of staff is always passed on to the Focal Point and dealt with under Chapter 12 or 13.
- The child receives feedback on how the complaint was dealt with, in an age-appropriate way. Time limits follow the complaints rules of the service concerned.

15. Data Protection and Confidentiality

- Records of concerns, reports and their handling are kept by the Focal Point separately from ordinary client records, in a lockable cabinet or in electronic form with restricted access. Only what is necessary for working with the client is entered in the client log and support plan (in accordance with the service methodology).
- Only the Focal Point, the Deputy, the Director and, to the extent necessary, the manager of the relevant service have access to the records. Volunteers and interns have no access.
- Retention period: records of allegations against staff are retained for at least the duration of the employment relationship and for 10 years after it ends.
- Information is shared with OSPOD, the Police of the Czech Republic, schools or other services to the extent necessary to protect the child or as required by law. A record is made of any information sharing.
- Photographs and videos of children are taken only on work devices and stored on the service's server. They may be published only with the written consent of the legal guardian and, for children aged 12 and over, also with the child's consent (Annex 6). We do not publish full names, places of residence or any information from which a child could be identified as a service user. Children from the asylum house and children affected by domestic violence are never photographed for public purposes.
- The processing of personal data is governed by the P+ Personal Data Protection and Processing Principles and the GDPR.

16. Online Safety

16.1 The Lehkost.cz platform

The Lehkost.cz platform enables schools to describe a child's situation in plain language and to connect it with professional support. Child protection is built into the way it operates:

- The school describes the child's situation without identifying data. Each request is assigned an anonymous identifier (client key).
- A request can be linked to a specific child only once the legal guardian has given consent. Consent is granular – the legal guardian decides with which actors information is shared.
- The client log is closed, with role-based access control. Each organisation sees only the part of the information for which it has explicit consent.
- If a request or follow-up work indicates that a child is at risk of violence or neglect, the P+ staff member proceeds in accordance with Chapter 12. The duty to protect the child takes precedence over the platform's restrictions. Schools are made aware of this in the terms of cooperation.
- Interactive case conferences involving the child are held only with the family's consent. They are led by a trained facilitator who ensures that they are safe and appropriate for the child.

16.2 Communicating with children online

- Staff communicate with children and young people only through work accounts and work phones, and never from private profiles.

- Communication must be transparent and traceable. It is archived to the extent necessary in accordance with the service methodology. Video calls with a child are not recorded without consent.
- Service profiles on social media are managed by designated staff. They do not publish information that would allow children to be identified as service users. Comments and messages are checked regularly.
- Staff do not accept friend requests from children on private accounts and explain to the child, in a way they can understand, why not.

16.3 Online risks

When a member of staff learns of cyberbullying, grooming, sextortion or the distribution of a child's intimate images, they follow Chapter 12. They do not share or forward the content, as doing so could itself be unlawful. They only record where and when they saw the content and pass the information on to the Focal Point, who considers reporting the matter to the Police of the Czech Republic and reporting the content to the platform operator. The prevention of online risks is addressed through primary prevention programmes and digital safety activities for children.

17. Child Participation

Children are not merely recipients of help but rights-holders. We involve them in matters that affect them – in planning our work with them, in shaping activities in our facilities, in evaluating services and in projects. Participation must be safe, meaningful and age-appropriate:

- Participation is voluntary. A child may decline or leave at any time without any negative consequences.
- The child and the legal guardian receive clear information in advance about what the child is being asked to give their views on and what will happen to those views. Their informed consent is required for participation.
- Activities are led by trained staff. We avoid questions that could lead to re-traumatisation. A child must never be pressured to talk about their own experiences of violence.
- We always give the child feedback on how their views were used.
- The code of conduct and data protection rules apply to participation activities as they do to all other activities.

18. Partners, Contractors and Projects

- Partner organisations, contractors and external trainers who come into contact with children in the course of P+ activities are made familiar with this policy. They undertake to comply with it or to provide evidence of their own comparable child protection policy.
- Cooperation agreements and contracts for activities involving children include a child protection clause (Annex 9).
- In partnership projects, it is determined during preparation which partner works directly with children and what child protection measures it applies. Public bodies (e.g. municipalities) may, instead of their own policy, provide a sworn statement by their statutory representative confirming that their measures meet the Keeping Children Safe standards.
- Partners must inform P+ without delay of any incident or concern relating to children involved in joint activities. P+ informs partners in the same way.
- If a partner seriously breaches child protection principles, P+ may suspend or terminate the cooperation.

Part D – ACCOUNTABILITY

19. Monitoring and Record-Keeping

- The Focal Point maintains a central record of concerns, reports and their handling. For evaluation purposes, the Focal Point also keeps an anonymised overview: date, service, type of concern, measures taken, outcome.
- Incidents relating to children's safety are also recorded on the incident form of the service concerned in accordance with its methodology.
- The Focal Point submits a child protection report annually to the Senior Management Team and once a year to the Board of Directors. The report covers the number and types of cases, completion of training, risk assessment results, feedback and recommendations. It contains no personal data.
- Compliance with the policy forms part of internal quality control and the process audit of services.
- We regularly collect feedback from children, parents and staff, for example through a short questionnaire or a discussion in the facility.

20. Policy Review

- The policy is reviewed at least every 2 years, like the other DESATERO P+ documents. An extraordinary review takes place after a serious incident, a change in legislation or a fundamental change in the organisation's activities.
- The review is prepared by the Focal Point together with the methodologist. It is based on the annual report, case experience and feedback from staff and children. Changes are approved by the Director.
- Changes are recorded in the version control log. Staff are briefed on changes at team meetings.

21. Publication and Communication of the Policy

- The policy is published on the P+ website in the Downloads (Ke stažení) section, in Czech, together with an English summary (Annex 8).
- The child-friendly version (Annex 7) is displayed in all facilities where we work with children and is available on the website.
- Parents and legal guardians are informed of the policy at the start of cooperation.
- Every member of staff confirms by signature that they have read the policy (Annex 1). Partners and contractors receive it when cooperation is agreed.

Final Provisions

This policy is binding on all persons listed in Chapter 2.2. Everyone is required to familiarise themselves with its content and comply with it. Any amendments or exceptions must be approved by the organisation's Senior Management Team. The policy takes effect on 1 June 2026.

Version Control Log

Edition	Effective from	Next review	Summary of changes
1	1 June 2026	By 31 May 2028 at the latest	First edition.

Annexes

Annex 1: Code of Conduct – Staff Declaration

I, the undersigned, declare that:

- I have read the Child Protection Policy in P+ (special annex to DESATERO P+) and the code of conduct in Chapter 9, I have understood them and I will comply with them;
- I will pass on any concern about a child's safety to the Focal Point without delay in accordance with Chapter 12;
- I have no entry in the criminal record that would exclude me from working with children, and I am not aware of any fact that would call into question my suitability to work with children;
- I will inform management immediately of the commencement of criminal proceedings against me or of any other fact that could call my suitability into question;
- I acknowledge that a breach of the code constitutes a breach of employment duties and may lead to termination of employment or cooperation.

Full name	
Position / role, service	
Date	
Signature	

Annex 2: Concern / Disclosure Record Form

Complete as soon as possible, on the same day at the latest. Write factually, without your own interpretations. Hand the form to the Focal Point in person or by secure means. Do not keep a copy.

Item	Record
Staff member's name, service	
Date and time of record	
Child (name or nickname, age, sex)	
When and where the event / disclosure occurred	
How the information came to light (child's disclosure / observation / third-party report)	
Exactly what the child said – in their own words wherever possible	
What you observed (behaviour, injuries, environment)	
What you said to the child and how you responded	
Who else was present or knows about the matter	
Is the child in immediate danger? What measures have you taken?	
To whom and when the information was passed on	
Staff member's signature	

To be completed by the Focal Point: assessment, decision, report (to whom, when), next steps, closure	

Annex 3: Flowchart for Responding to a Child Safety Concern

CONCERN ABOUT A CHILD'S SAFETY (a child has disclosed · I notice warning signs · someone has told me · online)
Is there immediate danger? YES → call 112 / 158 / 155, stay with the child, then continue NO → continue
Listen, do not promise confidentiality, do not investigate
Record on the same day (Annex 2)
Pass on within 24 hours to the Focal Point + service manager (concerns a member of staff? → Chapter 13 → Director / Chair of the Board)
The Focal Point assesses and decides
Abuse · sexual abuse · serious risk · criminal offence → report IMMEDIATELY to OSPOD / Police of the Czech Republic Other situations → follow the SPOD Methodology, with a set evaluation period
Support for the child and family · referral to services
Closure, review, filing of the record

Annex 4: Activity Risk Assessment Form

Service / activity	
Responsible person, date of assessment	
Description of activity, venue, dates	
Children (number, age, specific needs)	
Staffing (number of adults, volunteers, partners)	

Risk	Likelihood (H/M/L)	Impact (H/M/L)	Mitigation measures	Responsible

Approved by (section head): …… Date: ……

Annex 5: Contacts

Contact	Details
Child Protection Focal Point in P+	Ing. Tereza Nováková, HR Officer, +420 778 540 214, tereza.novakova@prostor-plus.cz

Deputy Focal Point	Ing. Kateřina Kvapilová, HR Administrator, +420 774 705 724, katerina.kvapilova@prostor-plus.cz
Director of P+	Mgr. Petr Steklý, +420 608 123 013, petr.stekly@prostor-plus.cz
Chair of the Board of Directors	Jiří Stuchl, +420 774 650 198, jiri.stuchl@prostor-plus.cz
OSPOD Kolín	321 748 259 (department), 321 748 111 (switchboard)
OSPOD Kutná Hora	327 710 286 (head of unit), 327 710 111 (switchboard)
OSPOD Čáslav, Český Brod, Poděbrady	Čáslav – 327 300 110 (department), Český Brod – 321 612 126, Poděbrady – 325 600 460.
OSPOD in the Pardubice Region (Pardubice and other municipalities according to the child's residence)	Pardubice – 466 859 201, 466 859 641 (child at risk), 466 859 111 (switchboard); other municipalities: OSPOD of the municipality with extended powers according to the child's residence
OSPOD in Prague (municipal district office according to the child's residence)	Contacts for the Prague 1–22 municipal district offices: praha.eu/documents/d/praha/ospod_umc_p1_22_3016629
Emergency numbers	112 · Police of the Czech Republic 158 · Emergency Medical Service 155
Linka bezpečí (helpline for children and students)	116 111
Rodičovská linka (parent helpline)	606 021 021 (Linka bezpečí; for parents, grandparents and teachers)

Annex 6: Consent to Taking and Publishing Photographs and Videos

I, the legal guardian of the child ……, consent / do not consent to Prostor plus o.p.s. taking photographs and video recordings of my child during the activity …… and using them:

- for internal service documentation only YES / NO
- in the annual report and printed materials YES / NO
- on the P+ website and social media YES / NO
- in materials for funders and grant providers YES / NO

I acknowledge that the child's full name and any other details enabling the child to be identified as a service user will not be disclosed, and that I may withdraw my consent at any time. Consent of the child (aged 12 and over): YES / NO.

Date and signature of the legal guardian: …… Signature of the child: ……

Annex 7: Child-Friendly Version – "You Are Safe Here"

You are safe here

At Prostor plus, we want you to feel good and safe with us.

Nobody is allowed to hurt you – not adults, not other children. Nobody is allowed to shout at you, put you down, hit you, touch you when you don't want them to, or send you or ask you for unpleasant photos or messages.

Our staff follow rules: they speak to you with respect, only message you from a work phone or work account, never take photos of you without your permission and always tell you what is going to happen.

If there is something you don't like, something is worrying you or someone is hurting you – at home, at school, outside or online – tell any one of us you trust. We will believe you and we will help you.

Sometimes, so that we can help you, we have to tell other people who know how to help. We will always tell you who and why.

You can also make a complaint – out loud, in the box at the club, by e-mail or even without signing your name.

Our contact person: Tereza Nováková, +420 778 540 214. Linka bezpečí: 116 111 (free, 24/7).

Recommendation: produce the child-friendly version in two graphic variants (an illustrated one for younger children and one for adolescents), ideally developed together with children from the low-threshold youth clubs.

Annex 8: English Summary – Child Protection Policy of Prostor plus o.p.s.

Prostor plus o.p.s. (P+) is a non-profit organisation based in Kolín, Czech Republic, providing social services, education, community and therapeutic programmes in the Central Bohemian Region (mainly the Kolín, Kutná Hora and Poděbrady areas), the Pardubice Region and Prague. We work with children and young people in low-threshold youth clubs, family support services, an asylum house, children's groups, a summer day camp, school-based prevention and support programmes (including Early Intervention Teams, the Lehkost approach and the Lehkost.cz platform), and outreach work.

This Child Protection Policy (Child Protection in P+, a special annex to the DESATERO P+ set of internal directives) is aligned with the four areas of the Keeping Children Safe Child Safeguarding Standards and is binding on all staff, volunteers, interns, board members, external contractors and project partners in contact with children.

1. Policy. P+ has zero tolerance of any form of violence, abuse, exploitation or neglect of children. The best interests of the child are the primary consideration. A child is any person under 18. The policy covers all forms of violence as defined in Article 19 of the UNCRC, offline and online, including children witnessing domestic violence. It is based on the UNCRC, the EU Charter of Fundamental Rights, Czech child protection law (Act No. 359/1999 Coll.), the Criminal Code, the Social Services Act, the GDPR and the Commission Recommendation on integrated child protection systems.

2. People. A designated Child Protection Focal Point and a deputy are appointed. Safe recruitment applies to all staff, volunteers and interns: child protection is stated in job advertisements, interviews include safeguarding questions, at least two references are checked, and a criminal record certificate is required before any contact with children and renewed regularly. All personnel sign a Code of Conduct (e.g. no being alone with a child outside observable settings, communication only via work channels, no private social media contact, no photos on private devices, no gifts). Induction training is mandatory before independent work with children, with annual refresher training and specialised training for the Focal Point and managers.

3. Procedures. Risk assessments are carried out for every service, activity, trip and online tool. A clear reporting procedure applies: ensure the child's immediate safety, record the concern the same day, report to the Focal Point within 24 hours, assess, and report without delay to the child protection authority (OSPOD) and/or the Police in cases of abuse, serious risk or suspected crime. Concerns do not need to be verified before being reported internally. Allegations against staff or volunteers follow a separate procedure involving immediate removal from contact with children during the investigation, escalation to the Director or Board Chair, and cooperation with the Police. Children have access to child-friendly complaint channels, including anonymous ones. Data protection, photo consent, online safety (the Lehkost.cz platform uses anonymous client keys and granular parental consent), safe child participation and requirements for partners and contractors are defined.

4. Accountability. The Focal Point keeps a central record of concerns and reports annually to management and to the Board. The policy is reviewed at least every two years and after any serious incident. It is published on www.prostor-plus.cz together with a child-friendly version displayed in all premises.

Child Protection Focal Point: Ing. Tereza Nováková, HR Officer, +420 778 540 214.

Approved by: Mgr. Petr Steklý, Director, 1 June 2026.

Annex 9: Model Child Protection Contract Clause

"The Contracting Party undertakes, in performing this contract, to comply with the Child Protection Policy of Prostor plus o.p.s. (special annex to DESATERO P+), with which it has been made familiar, or with its own equivalent child protection policy. The Contracting Party shall ensure that persons involved in activities with children on its behalf have a clean criminal record evidenced by a criminal record certificate and are familiar with the child protection rules. The Contracting Party shall inform Prostor plus o.p.s. without undue delay of any suspected risk to a child in connection with the performance of the contract. A serious breach of this obligation constitutes grounds for withdrawal from the contract."