



ARIE LIVNE JEWISH CULTURAL CENTER

CHILDREN AND YOUTH SAFEGUARDING POLICY

with codes of conduct, reporting protocol
and accompanying forms

2 Gavre Vučkovića Street, 78000 Banja Luka
Republika Srpska, Bosnia and Herzegovina
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This document consists of the core Policy and mandatory accompanying annexes. All annexes form an integral part of the Policy.

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Adoption details

Decision number: _____

Date of adoption: _____

Adopting body: _____

Next review date: _____

This document shall be reviewed at least annually and without delay following a serious incident, a change in applicable law or a significant change in the Center's programmes.

I. CHILDREN AND YOUTH SAFEGUARDING POLICY

1. Purpose and commitment

The Arie Livne Jewish Cultural Center LLC Banja Luka (the “Center”) is committed to ensuring that every child and young person participating in its programmes is safe, respected and protected from violence, abuse, neglect, exploitation and any degrading treatment. The best interests of the child take precedence over programme, reputational and organisational interests.

This Policy applies on the Center’s premises, during visits, travel, workshops, camps, cultural and educational events, accommodation and transport, and in digital communications connected with the Center’s activities.

2. Scope

- All children, meaning persons under 18 years of age, regardless of nationality or place of residence.
- Young adult participants, with particular attention to persons aged 18 to 30 who may face increased risk due to disability, health, dependency, social exclusion or another circumstance.
- Employees, governing bodies, associates, contractors, trainers, volunteers, interns, partners, suppliers, accompanying adults and visitors who come into contact with children through the Center’s activities.

3. Legal and professional framework

This Policy shall be interpreted and applied in accordance with the applicable law of Bosnia and Herzegovina and Republika Srpska, particularly legislation governing social and child protection, protection from violence, criminal-law protection of children, employment, non-discrimination and personal data protection, as well as the UN Convention on the Rights of the Child. Where an internal rule is stricter than a minimum statutory standard, the stricter rule applies unless contrary to law.

This Policy does not replace mandatory reporting to competent authorities. A suspected criminal offence, immediate danger or serious threat to a child shall be reported without delay to the police, the competent social welfare centre and/or the prosecutor’s office, according to the nature of the case.

4. Core principles

- The child's best interests, dignity and safety are paramount.
- Zero tolerance for violence, abuse, sexual harassment, exploitation, neglect, hate speech, antisemitism and discrimination.
- Every child has an equal right to protection regardless of origin, religion, ethnicity, sex, gender, language, disability, health, property status or any other personal characteristic.
- A child shall be heard in a manner appropriate to age and maturity, without pressure or blame.
- Personal data shall be processed lawfully, for a specified purpose, to the minimum extent and with appropriate security.
- A person reporting in good faith shall be protected from retaliation.

5. Recognising risks and forms of harm

Physical violence: hitting, pushing, inappropriate physical punishment, exposure to danger or denial of necessary care.

Psychological and emotional abuse: threats, humiliation, ridicule, isolation, intimidation, manipulation, bullying and hate speech.

Sexual abuse and exploitation: any sexual activity with a child, inducement to sexual acts, unwanted touching, sexualised communication, recording, sharing or possession of child sexual abuse material and online grooming.

Neglect: failure to provide reasonable safety, supervision, healthcare, food, accommodation or emotional support.

Exploitation and trafficking: abuse of a child for gain, labour, fundraising, sexual or other exploitation.

Digital risks: cyberbullying, disclosure of data or location, private messages without justification, inappropriate content, recording without a lawful basis and unauthorised sharing.

Organisational risks: one-to-one work outside a visible space, unsuitable accommodation, transport without a plan, insufficient adult supervision, uncontrolled access and no emergency plan.

6. Preventive measures

6.1 Activity risk assessment

Before every activity involving children, the coordinator documents risks related to premises, transport, accommodation, excursions, digital platforms, health needs and contact with third parties. Measures, responsible persons, supervision, emergency contacts and evacuation procedures are identified. An activity shall not proceed if residual risk is unacceptable.

6.2 Safe recruitment and engagement

- For roles involving regular or direct contact with children, identity, qualifications, references and gaps in employment history are checked.
- Where legally permitted and proportionate to the role, criminal-record and/or pending-proceedings certificates are requested, with restricted retention and access.
- Before contact with children, every engaged person signs the Code and receives induction training.
- Contracts include the duty to comply with the Policy and consequences of a breach, including removal and termination.

6.3 Supervision and open-environment rule

Wherever possible, activities take place in a visible or open space and in the presence of at least two responsible adults. One-to-one work must be justified, approved in advance and visible to others. An adult shall not share a bed or room with a child, except in a documented medical emergency and with written parental/guardian consent.

6.4 Training and awareness

Staff and volunteers receive induction and periodic training on signs of harm, boundaries, receiving a child's disclosure, reporting, confidentiality, data protection and digital safety. Children and parents receive clear, age-appropriate information on rules and reporting channels.

6.5 Images, video and communication

Images or recordings of children are made only for a specified and explained purpose, on an appropriate legal basis and, where required, with separate parent/guardian consent and respect for the child's wishes. Refusal does not affect participation. Sensitive information, home address, contact details, precise real-time location or degrading/risky content shall not be published. Official communication uses approved channels and, for minors, includes a parent/guardian or another authorised adult.

7. Roles and responsibilities

The Center Director provides resources, training and implementation and ordinarily serves as the Children and Youth Safeguarding Officer.

The Safeguarding Officer receives reports, conducts an initial risk assessment, secures urgent measures, keeps protected records, refers cases to competent authorities and monitors action. The Officer does not conduct a criminal investigation or question a child beyond what is necessary for immediate protection.

The alternative contact is the President of the Jewish Community of Banja Luka where a report concerns the Director, a conflict of interest exists, or the Director is unavailable.

The activity coordinator prepares the risk assessment, verifies consents, briefs the team and participants and forwards every concern without delay.

All engaged persons must prevent harm, maintain professional boundaries and report concerns. They must not investigate independently, promise secrecy or mediate between the child and the reported person.

8. Reporting and response procedure

1. If there is immediate danger, first secure the child's safety and call the police (122) and/or emergency medical service (124).
2. Listen calmly, accept the disclosure without reaching conclusions, do not ask leading questions and do not promise complete secrecy. Explain that information will be shared only with persons who must help.
3. Immediately inform the Safeguarding Officer. If the report concerns the Director, contact the President of the Jewish Community of Banja Luka and, where needed, competent authorities directly.
4. Make a factual record the same day: the child's exact words, date, time, place, persons present, observed facts and actions taken. Do not include assumptions.
5. The Officer makes an initial assessment and refers without delay to Banja Luka Police Department, the competent social welfare centre, prosecutor's office or health service where required by law, immediate danger exists or there are reasonable grounds to suspect violence or a criminal offence.
6. The Center may immediately remove a person from contact with children as a temporary protective measure, without prejudging responsibility.
7. Support is organised with the fewest possible interviews, without confrontation with the reported person and with respect for privacy.
8. Internal follow-up and a response to the reporter, within confidentiality limits, are provided as soon as possible and ordinarily within 14 days. Statutory reporting and urgent measures never wait for that period.

9. Confidentiality, records and data protection

Access is limited to persons who need it to protect the child, meet a legal duty or establish, exercise or defend legal claims. Records are kept separately from general programme files, physically and electronically secured, with access logged. Data is not retained longer than necessary for the purpose, legal deadlines, the child's interests and potential legal proceedings. Retention and deletion are defined in the Center's processing records.

Reports shall not be sent through group messages or discussed with persons not involved in the response. Once a case is referred, the Center preserves evidence and avoids actions that could compromise an investigation.

10. Complaints, non-retaliation and disciplinary measures

A child, parent/guardian, participant, employee or third party may report orally or in writing, named or anonymously. Good-faith reporting shall not lead to retaliation. A knowingly false report may breach the rules, but an unsubstantiated report is not, by itself, false.

A breach may lead to a warning, additional training, restricted duties, removal, termination and reporting to authorities. An internal decision may be appealed to the Center's governing body within 14 days, but an appeal does not suspend urgent protective measures or official proceedings.

11. Contacts

Safeguarding Officer Center Director: Irena Đorđević	Telephone: _____ Email: _____
Alternative contact President of the Jewish Community of Banja Luka	Name: _____ Telephone/email: _____
Center 2 Gavre Vučkovića Street, Banja Luka	+387 51 251 261 jkc.arielivne@teol.net
Emergency contacts	Police 122 • Emergency medical service 124 Banja Luka Social Welfare Center: _____

12. Adoption and review

The Policy enters into force on the date of adoption. It is available to employees, associates, participants and the public. The Director monitors implementation and the governing body considers an annual anonymised report.

Responsible person / signature: _____

Seal and date: _____

II. CODE OF CONDUCT FOR EMPLOYEES, ASSOCIATES, TRAINERS AND VOLUNTEERS

The signatory accepts that safeguarding children is a personal and professional duty applying during activities, travel, accommodation, online communication and every contact arising through the Center's work.

I will:

- Treat everyone with respect and without discrimination and give due weight to the child's views.
- Maintain professional boundaries and avoid being alone with a child outside a visible or approved space.
- Use only appropriate, non-violent language and physical contact that is necessary, clear and acceptable to the child.
- Immediately report any suspicion, disclosure, breach or inappropriate conduct.
- Protect confidentiality and personal data and use images and devices only under the Center's rules.
- Declare conflicts of interest, close personal relationships or other circumstances that may affect my work.
- Follow supervision plans, safety procedures and instructions of the Safeguarding Officer.

I will not:

- Hit, humiliate, intimidate, ridicule, neglect, sexually harass or exploit a child.
- Develop a sexual or romantic relationship with a person under 18; mistaken age is not a defence.
- Request or exchange sexualised messages, images or content, or access child sexual abuse material.
- Give alcohol, tobacco, narcotics, weapons or dangerous items to a child, or work under the influence.
- Invite a child to private accommodation, transport a child alone without approval, or share a bed/room except for a documented exception.
- Use private/disappearing messages or conceal communication from parents, the team or the Center.
- Give gifts, money or privileges that create dependency, secrecy or favouritism.
- Investigate a report independently, confront the child with the reported person or promise secrecy.

I understand that a breach may result in immediate removal, disciplinary action, termination and reporting to competent authorities.

Full name: _____

Role / activity: _____

Place and date: _____

Signature: _____

III. PARTICIPANT CODE OF CONDUCT

The aim is for everyone to be safe, respected and included. This Code applies throughout the activity, including travel, breaks, accommodation, excursions and online groups.

As a participant, I:

- Respect other people, their religion, culture, identity, boundaries and property.
- Do not engage in physical, verbal, sexual or online harassment, violence, hate speech, antisemitism, discrimination or exclusion.
- Do not record or publish another person without permission and do not share private data or location.
- Follow safety, movement, accommodation, transport and return-time instructions.
- Do not bring weapons, drugs or dangerous items. Alcohol and tobacco are prohibited for minors.
- Report injury, illness, a missing person, danger or concerning conduct to a trusted adult.
- Will not remain silent if I see another person at risk.

If a rule is breached

The Center will hear the participant, assess safety and take a proportionate measure: supportive conversation, warning, restriction, notifying parents/guardians, removal from the programme or reporting to authorities. Immediate protection comes first. The participant may request review by the coordinator or Safeguarding Officer.

Activity: _____

Participant's full name: _____

Place and date: _____

Participant signature: _____

Parent/guardian signature (for a minor):

IV. DUTY OF CARE DIRECTIVE FOR ACCOMPANYING ADULTS

An accompanying adult assumes direct duty of care from the moment the child is received from the parent/guardian until safe handover after the activity.

Before travel/activity

- Check consents, emergency contacts, health needs, travel documents and insurance.
- Brief children on the plan, rules, contacts, meeting point and what to do if lost or unsafe.
- Check accommodation, rooming, transport, third-party access and emergency arrangements.

During the activity

- Know where children are, provide age- and risk-appropriate supervision and check welfare regularly.
- Do not leave a child alone in an unfamiliar environment; independent movement requires assessment, agreement and explicit approval.
- Do not share a room with a child except for a medically justified, documented exception.
- Respond immediately to a missing child, injury, fire, traffic accident, threat, violence or lost documents.
- In a medical emergency, call for help and notify the parent and Center; if the parent is unavailable, act in the child's best interests within the consent and law.
- Secure health and identification data from unauthorised access.

If violence or abuse is disclosed

Remain calm, listen without leading questions, thank the child for speaking, do not promise secrecy, record the exact words and immediately notify the Safeguarding Officer or competent authorities in an emergency.

Accompanying adult's full name: _____

Institution / group: _____

Activity: _____

Place and date: _____

Signature: _____

V. PARENT/GUARDIAN CONSENT FORM

Data is used only for organisation, safety and participant protection and is accessible to a limited number of authorised persons.

Activity: _____

Location and period: _____

Child's full name: _____

Date of birth: _____

Parent/guardian name: _____

Telephone and email: _____

Alternative emergency contact and telephone:

Health and other important information

Allergies and special diet: _____

Health conditions, disability or required adjustments:

Regular medication and instructions (staff do not administer medication without prior arrangement):

Other information relevant to safety and welfare:

Individual consents

☐ YES ☐ NO I consent to the child participating in the described activity and activities listed in the programme.

☐ YES ☐ NO I consent to organised transport specified in the programme.

☐ YES ☐ NO I consent to accommodation and room-sharing with another minor of a similar age, with due regard to sex/gender and privacy.

☐ YES ☐ NO If I cannot be reached in time, I consent to necessary emergency medical care. This does not exclude the organiser's duty to exercise due care.

☐ YES ☐ NO I consent to independent movement during free time only within boundaries, times and conditions set in writing by the organiser. If NO, the child must remain supervised.

Note: Consent for images and recordings is provided separately in Annex VI and is not a condition of participation.

I confirm that the information is correct, I have received the Policy and Participant Code, and I will report any change affecting the child's safety without delay.

Parent/guardian full name: _____

Relationship / basis of guardianship:

Place and date: _____

Signature: _____

VI. NOTICE AND CONSENT FOR PHOTOGRAPHS, VIDEO AND AUDIO RECORDINGS

Controller: Arie Livne Jewish Cultural Center LLC Banja Luka, 2 Gavre Vučkovića Street, 78000 Banja Luka; jkc.arielivne@teol.net; +387 51 251 261.

Purpose: documenting the activity, reporting to donors/partners and, only if selected, informing the public about the Center's work.

Legal basis: consent for public promotion and other statutory bases for necessary project documentation. Consent is voluntary and refusal does not affect participation.

Recipients: the authorised Center team; donor, auditor or partner where necessary for reporting; the public and platforms only for selected channels. Online material may be downloaded by third parties beyond the Center's control.

Retention: unpublished material is kept under the Center's processing records and project/statutory duties. Published material is removed from channels controlled by the Center upon a justified request unless another legal basis applies; previous copies and printed material may not be fully recoverable.

Rights: subject to law, you may request access, rectification, erasure, restriction, withdrawal of consent and may object or complain to the Personal Data Protection Agency in Bosnia and Herzegovina. Withdrawal does not affect prior lawful processing.

Consent choices

☐ YES ☐ NO Photography/recording for internal documentation and reporting to restricted recipients.

☐ YES ☐ NO Publication on the Center's website.

☐ YES ☐ NO Publication on the Center's official social media.

☐ YES ☐ NO Use in printed publications and promotional materials.

☐ YES ☐ NO Transfer to named project partners/donor for public promotion: _____

The child's name will not accompany an image unless separately explained and expressly approved:

☐ I approve ☐ I do not approve.

Child / participant name: _____

Parent/guardian name: _____

Place and date: _____

Parent/guardian signature: _____

Child's view/consent, appropriate to age - signature:

VII. SAFEGUARDING CONCERN OR INCIDENT REPORT FORM

URGENT: If a child is in immediate danger, first call 122/124 and secure safety. This form must not delay reporting.

Date and time concern was received/observed:

Reporter's name and contact (may be blank for an anonymous report):

Activity and location: _____

Child/person concerned: _____

What was observed or disclosed - facts and exact words, without interpretation:

Persons present / possible witnesses:

Immediate danger or need for medical help:

Immediate action taken and persons contacted:

Existing documents/recordings/evidence and secure location:

Signature and date: _____

Official action record

Date and time received by Safeguarding Officer:

Initial risk assessment and reasons:

Urgent protective measures: _____

Authority/service notified, contact and reference number:

Decisions, reasons and date: _____

Follow-up and support plan: _____

Secure storage location and access level:

Officer name, signature and date:

VIII. RISK ASSESSMENT CHECKLIST

Activity / date / location: _____

Coordinator and Safeguarding Officer:

Number and age of children; number of adults:

Risk	Who may be harmed	Measures and responsible person	Residual risk
Premises and third-party access			☐ Low ☐ Medium ☐ High
Adult-to-child ratio			☐ Low ☐ Medium ☐ High
One-to-one work			☐ Low ☐ Medium ☐ High
Transport and movement			☐ Low ☐ Medium ☐ High
Accommodation and overnight stays			☐ Low ☐ Medium ☐ High
Health, allergies and disability			☐ Low ☐ Medium ☐ High
Excursions and physical activities			☐ Low ☐ Medium ☐ High
Images and personal data			☐ Low ☐ Medium ☐ High
Online communication			☐ Low ☐ Medium ☐ High
Violence, hate speech and peer risk			☐ Low ☐ Medium ☐ High
Emergency / evacuation			☐ Low ☐ Medium ☐ High
Other risk: _____			☐ Low ☐ Medium ☐ High

Decision: ☐ approved ☐ approved with additional measures ☐ not approved

Coordinator signature / date: _____

Safeguarding Officer approval / date:
