

TRIPLE P – POSITIVE PARENTING PROGRAM®

CHILD PROTECTION (SAFEGUARDING) POLICY

If you are concerned that a child faces ***imminent danger***, please ***immediately*** contact emergency services and/or other appropriate authorities.



voor iedere ouder

CHILD PROTECTION (SAFEGUARDING) POLICY

TRIPLE P EUROPE

Triple P's mission is to create global social change by putting evidence-based parenting practices in the hands of every parent and carer. We want all parents and carers, including those in at-risk and marginalised populations, to be able to raise confident, healthy, happy children and teenagers, develop strong family relationships and create protective, safe environments for families and communities.

Triple P draws on social learning, cognitive behavioural and developmental theory and research about children to educate and promote positive family relationships and healthy children. Triple P believes in evidence-based parenting interventions and the development and evaluation of Triple P programs is informed by feedback from children and parents.

Triple P Parenting believes strongly in the rights of children and the importance of treating children with respect. All children have the right to a safe physical, emotional and social environment.

CHILD PROTECTION AND SAFEGUARDING STATEMENT

Triple P Europe B.V. ("Triple P EU"), is committed to ensuring that the safety, wellbeing, dignity, and rights of children are central to everything we do.

As a provider of the evidence-based Triple P-Positive Parenting Program® and the Positive Early Childhood Education ("PECE") program, we deliver services to parents, caregivers, practitioners and organisations, rather than directly to children. Although direct interaction with children is not a routine part of our operations, we recognise that our work directly influences the lives of children and young people.

We believe that every child has the right to be safe, respected, heard, and protected from harm. We are dedicated to assisting in the creation of parenting and educational environments where children can participate, learn, and develop free from abuse, exploitation, neglect, discrimination, harassment, or violence.

Triple P EU has zero tolerance for child abuse, exploitation, neglect, or any form of violence against children. We take all concerns, disclosures, allegations, and suspicions of harm seriously. We are committed to responding promptly and appropriately, in accordance with applicable laws and safeguarding requirements.

We expect all employees, contractors, volunteers and partners acting on behalf of Triple P EU to uphold the highest standards of conduct and to actively contribute to the safety and wellbeing of children. Safeguarding children is a shared responsibility. Everyone at Triple P EU has a duty to promote and protect children's rights and welfare. We place the best interests of the child at the centre of our work, including through our policies, procedures and training.

OBJECTIVES

The purpose of this policy is to:

- Clearly demonstrate Triple P EU's commitment to the safety and wellbeing of children and young people.

- Inform leaders, staff and contractors of their obligations towards children and their roles and responsibilities in ensuring the safety and wellbeing of children.
- Give guidance on our processes and procedures that aim to ensure children's safety and wellbeing across all areas of the organisation.

SCOPE

This Policy applies to all directors, employees, contractors, consultants, facilitators, volunteers, and any other individuals engaged by or acting on behalf of Triple P EU. All personnel are required to comply with this Policy and to apply its principles in all aspects of their work, regardless of their role, employment status, or location.

Attention must be given to this Policy in the limited circumstances where personnel may have direct or indirect contact with children, including but not limited to:

- Delivering training, accreditation, presentations, or related services in settings where children may be present, such as schools, early childhood services, community organisations, healthcare settings, or other child-focused environments.
- Participating in events, observations, demonstrations, or activities where children may be present.
- Creating, recording, or producing marketing, promotional, educational, or training materials in which children may appear, including photographs, videos, interviews, testimonials, or case studies.
- Any other circumstance where personnel may interact with, observe, collect information about, or otherwise engage with children in the course of their work.

All personnel are expected to conduct themselves in a manner that promotes and protects the safety, wellbeing, dignity, privacy, and rights of children and to comply with the safeguarding, privacy, and ethical requirements set out in this Policy and any related organisational procedures. Failure to comply with this Policy may result in disciplinary action and, where appropriate, referral to relevant authorities.

This Policy applies to all activities undertaken by or on behalf of Triple P EU, including:

- All work-related activities undertaken by our personnel, whether conducted in person, online, remotely, or through digital platforms.
- Activities conducted by partner agencies, researchers, consultants, contractors, and other third parties acting on behalf of or in connection with Triple P EU, where they:
 - Are undertaking research or evaluation of the Triple P or PECE programs; and
 - Encounter children; and/or
 - Collect, use, or disclose information relating to children.

Such parties are expected to comply with the requirements of this Policy and to uphold the safety, wellbeing, dignity, rights, and privacy of children at all times.

DEFINITIONS

Common Forms of Child Abuse, Harm and Exploitation

The definitions below are provided to support awareness, prevention, identification, and appropriate responses to child safeguarding concerns.

- A **child** is a person under the age of 18 years

- **Child abuse** occurs when a child's safety, wellbeing or development is harmed or placed at risk through the actions or omissions of a parent, caregiver, another adult or another child. Abuse can take many forms, including physical, emotional, and sexual abuse, as well as neglect. A Child may experience abuse within their family, community, or institutional environments. Perpetrators may be familiar to the child or unknown to them. Behaviour is considered abuse based on the harm it causes a child, regardless of whether the person involved intended to cause harm. We acknowledge that certain children are more vulnerable to abuse due to their individual circumstances and may require additional safeguards and support to ensure their safety and wellbeing. If interacting with children, we should be aware of an increased risk when children have a disability or additional need, have communication difficulties, are in out-of-home care or where the carers are dealing with challenges such as domestic violence, drug or alcohol misuse etc.
- **Neglect** is a failure to provide a child with appropriate care and supervision to the extent that their health, development or wellbeing is adversely affected. This may include depriving a child of essentials such as food, clothing, warmth, hygiene, medical attention, learning opportunities, supervision and a safe environment.
- **Physical abuse** is where someone deliberately hurts a child or puts them in situations where they could be physically harmed. This may occur once or happen repeatedly over time.
- **Emotional abuse** is a consistent pattern of behaviour that harms a child's emotional wellbeing and psychological development. It occurs when a caregiver repeatedly fails to meet a child's needs for love, support, attention, stability, and security. Normal family conflicts or infrequent parenting challenges are not emotional abuse. We acknowledge that emotional abuse may arise when parents, caregivers, or other responsible adults lack the awareness, capacity or ability to meet a child's emotional and psychological needs.
- **Sexual abuse** is where a child is involved in or exposed to sexual activities or content for someone else's sexual gratification. Child sexual abuse is not limited to a single type of behaviour and can include a wide range of abusive actions, including direct sexual contact, sexual acts, or exposure to pornography and other sexual content.
- **Grooming** is a process where a person gradually gains a child's trust, and often the trust of their family or support network, to make it easier to exploit, abuse, or harm the child.
- **Online exploitation** is the use of digital communication or technology to exploit, manipulate or abuse a child. It can occur through social media, online games, messaging applications, websites, or other online platforms. Online Exploitation may involve sexual exploitation, grooming, coercion, harassment, threats or intimidation, the misuse of a child's personal information or images, or encouraging a child to engage in harmful activities.
- **Child labour** is any work or activity that exploits or harms a child, puts them at risk, or stops them from learning, developing, and enjoying a safe and healthy childhood. This includes work that is excessive, hazardous, coercive, prevents a child from participating fully in education, recreation and family life, or is otherwise inappropriate for their age.
- **Child sexual exploitation material** is any photo, video, or other content that shows or involves the sexual abuse or exploitation of a child. Creating, sharing, viewing, or storing this material harms children and is a form of child abuse.

Terms use at Triple P EU

The definitions below are regarding terms used to refer to specific groups of Triple P EU staff.

- **Clinical Staff** means workers at Triple P, whether employed or contracted, who engage in technical development and review of Triple P materials and content to ensure validity and consistency with ongoing studies and knowledge of child development and psychology.
- **Child-related work** for the purposes of this policy means being engaged in work activities where contact (physical, face-to-face, oral, written or electronic contact) between a staff member and a child would reasonably be expected as a normal part of the work and such contact is not occasional (infrequently or irregularly) and incidental (occurring by chance) to the work.
- **Incident Report Team** means the Director, CEO, Head of Legal, Head of HR and the Child Protection Officer.

ROLES AND RESPONSIBILITIES

Triple P EU WILL:

- Publicly commit to being a Child Safe Organisation.
- Prioritise children's safety and wellbeing in all our decisions and actions.
- Continue to embed a culture of child-focus and child safety as a paramount consideration in the development of the Triple P and PECE programs.
- Create work environments that reduce the likelihood of harm, through:
 - Making this Child Protection (Safeguarding) Policy accessible to all staff.
 - Undertake an annual risk assessment in relation to child-related activities, to identify the level of responsibility for and contact with, children and young people, evaluate the risk of harm or abuse, and put in place appropriate strategies to manage identified risks.
 - Coordinate appropriate child protection (safeguarding) training for staff
 - Obtain and review worker screening / checks where appropriate, and/or legally or contractually required.
- Engage families and communities in promoting child safety
- Takes all disclosures, allegations, or concerns about child harm seriously and respond in a fair and timely manner, prioritising the safety and wellbeing of the child.

Everyone at Triple P EU MUST:

- Ensure child safety is considered when developing risk assessments for any functions that are associated with children within their business area.
- Ensure child safety in the design and delivery of programs that directly impact upon children.
- Appropriately report any potential risk to child safety.
- Before photographing or filming a child or using a child's image for work, obtain informed consent from the child's parent or legal guardian and follow the appropriate communications and media procedure.
- To the extent we hold any child-related data, ensure it will not be used to exploit or harass children.

All Clinical Staff have additional safeguarding responsibilities and MUST:

- Comply with relevant legislation and mandatory reporting requirements of their profession and clinical licenses, if any.

- Act in accordance with the standards and codes of their profession, maintain their continuing professional development and registration as required by the regulating body.

All Staff Engaged in Child-Related Work MUST:

- Treat children respectfully.
- Use age-appropriate language.
- Maintain professional boundaries.
- Obtain required parental/guardian permissions.
- Ensure another adult is present when working with or near children.
- Cooperate with appropriate worker screening / checks, and legal requirements and report any change in circumstances to Triple P EU senior management and the Head of HR.
- Disclose all charges, convictions and other outcomes of an offence that relate to child exploitation and abuse.
- Immediately report to their manager if they have a reasonable suspicion of child exploitation or abuse of a child.

All staff engaged in child-related work MUST NOT:

- Use offensive, discriminatory, sexual, demeaning or culturally inappropriate language.
- Harass, physically, sexually or emotionally abuse, groom, coerce, or exploit a child.
- Exchange personal contact details with the child.
- Share inappropriate images or content.
- Exploit a position of trust
- Have contact with the child outside of the work environment (if contact is derived from the course of their work).
- Not assist a child with a personal task they can do themselves such as toileting, undressing or showering.

Child Protection Officer

Triple P Europe has appointed our Deputy Head of Training to be our Child Protection Officer. With her clinical background and oversight, she has the requisite skills, experience and knowledge of child development and child protection matters, as well as experience managing confidential and sensitive matters. As our designated safeguarding leader, she will support Triple P Europe's efforts to prevent, identify, respond to and reports concerns relating to child abuse, neglect, exploitation, and other safeguarding risks. As the organisation does not work directly with children, their responsibilities include:

- Acting as Triple P EU's designated child protection contact.
- Promoting a child-safe culture throughout the organisation.
- Monitoring implementation and compliance with child-safe practices, this policy and associated procedures.
- Reviewing and updating (where required) this policy annually.
- Providing advice on child safeguarding risks and emerging issues.
- Receiving and managing the response to disclosures, allegations, suspicions, and complaints relating to child abuse or harm.
- Determining when concerns should be referred to appropriate agencies such as the police (Politie) or child protection services and liaising with these authorities.
- Identifying child safeguarding risks across the organisation.
- Conducting safeguarding risk assessments (where required).
- Recommending measures to reduce risks to children.
- Arranging safeguarding training

INCIDENT REPORTING/MANDATORY REPORTING

If anyone who works at Triple P EU becomes aware of or reasonably suspects any abuse or neglect towards a child (including disclosures, allegations and child safety concerns), they must:

- Report the incident to their senior manager or the Incident Report Team for referral to the relevant authorities, in line with the relevant laws of the applicable EU member state;
- Make an authorised disclosure to the police if there is an immediate threat to the safety, welfare or well-being of a child or young person.

All staff are required to comply with any legislative mandatory reporting requirements of the jurisdiction in which they are working or visiting. Any questions about these laws, including who must report and what must be reported, should be directed to Triple P EU's Child Protection Officer.

REPORTING CONCERNS

Proof of the abuse, neglect, grooming or exploitation of a child is **NOT** required to report a concern. Any reasonable concern should be reported **as soon as possible**. We will take all concerns about the safety and wellbeing of a child or young person seriously and will ensure we respond promptly, fairly and in the best interests of the child.

What Should Be Reported

Concerns that must be reported include, but are not limited to:

- Suspected, witnessed or disclosed abuse, neglect, grooming or exploitation of a child
- Disclosures by a child of abuse, neglect, grooming or exploitation
- Concerns regarding a child's safety, wellbeing, or welfare including online safety.
- Inappropriate behaviour by a staff member, volunteer, contractor, or anyone else working at or partnering with Triple P EU.
- Policy breaches
- Unsafe practices
- Online safety concerns

How to Report a Concern

Any person who has a child safety concern should immediately report it to the Child Protection Officer, the Head of HR (where appropriate) and/or Triple P EU's CEO. Reports may be anonymous and may be made:

- In person
- By telephone +31687125629
- By email kinderbescherming@eu.triplep.net
- By mail: Koninginneweg 97, 1211 AP Hilversum

People may report a child safety concern through any of our "contact us" channels, though to expediate the report, we encourage people to use the designated email address kinderbescherming@eu.triplep.net. Where a complaint is made through social media or another insecure public channel, we will ask the complainant to continue the complaint through a more secure method of communication to protect their and/or the child's personal data.

IMMEDIATE RISK TO A CHILD

If you are concerned that a child faces **imminent danger**, please **immediately** contact emergency services and/or appropriate authorities.

Child Disclosures

If a child discloses harm or abuse:

- Remain calm and listen carefully.
- Take the child seriously.
- Reassure the child that they have done the right thing by speaking up.
- Avoid asking leading questions or conducting your own investigation.
- Explain, in a way the child can understand, that the information may need to be shared with people who can help keep them safe.
- Record the disclosure accurately and promptly.
- Report the matter immediately in accordance with this policy.

Records of Child Safety Concerns

We will keep appropriate records about any child safety concerns which are reported to Triple P EU. Records will include the date of receipt, copies of correspondence and documents, records of conversations and the outcome of our investigation of the matter, including reports to authorities and other actions taken in response.

Outcomes and Escalation

Where the person who reported the concern notifies us that they are unsatisfied with the outcome or how we handled the reported concerns, the matter will be escalated to the Triple P Group's General Manager who will review the matter and respond to the individual. Once a matter is escalated to the Group General Manager and a decision is made about what actions will be taken by Triple P EU in response, this decision is final.

ENGAGEMENT OF THIRD PARTIES

Triple P EU has a responsibility to ensure that external organisations engaged by us also fulfil their obligations to protect children and young people from harm. Third party arrangements where child safety is relevant to the activity being undertaken should be reviewed to ensure the appropriate conditions are included in any agreement with third party providers, including having equivalent child safety practices and reporting responsibilities. Business leaders engaging third parties are to undertake a risk-based assessment at the procurement stage as to whether the organisation meets requisite child protection expectations and obligations.

EQUITY AND INCLUSION

Our staff policies and training at all levels of the Triple P Corporate Group operate to counter discrimination and exclusion. Where possible and appropriate, Triple P EU will seek the views of children and young people. We will consider and accommodate (where possible) the needs of children with disability, children from culturally and linguistically diverse backgrounds, children who are unable to live at home and LGBTIQ+ children and young people.

RESPECTFUL RELATIONSHIPS

Input and feedback of families and communities will inform Triple P EU's approach to child safety and wellbeing, including when reviewing policies and procedures. The effectiveness of the Triple P and PECE programs are measured, analysed and recorded. Any program delivered for use by children in conjunction with their parents will be evaluated in terms of how the program impacted those children and continually improved and monitored for any safety concerns.

Should Triple P EU engage with children and young people, child-friendly and safe language and materials will be used. Materials delivered to or impacting children have been developed and reviewed by Clinical Staff in child developmental psychology and social work.

Where our staff engage with others, strict guidelines apply to:

- The type of engagement and discourse engaged in;
- The language used; and
- Enable protection from cyber bullying.

RISK ASSESSMENT

Triple P EU does not usually have interactions with children. Where situations arise where children may encounter our personnel, the Child Protection Officer will complete a risk assessment that considers:

- The circumstances of the encounter e.g. the child attends with their parent to be filmed for a testimonial.
- The specific risks that may affect the child in that specific context.
- The personal data of the child that we will collect and process. Where appropriate the DPO may assist the Child Protection Officer in considering this aspect of the assessment.
- Any additional safeguards which should be put in place to help protect the child.

RECRUITMENT AND SCREENING

Triple P Europe is committed to recruiting and engaging personnel who share our commitment to child safety and safeguarding. While most roles within Triple P Europe do not involve direct work with children, we recognise that some personnel may, from time to time, have contact with children, access information relating to children, or undertake activities that could impact children and young people. We therefore take a risk-based approach to recruitment, screening and workforce management.

During our recruitment process, we verify the identity, qualifications, experience and suitability of prospective personnel. We consider the nature of each role, to determine whether it involves contact with children, access to child-related information, or other safeguarding considerations. Where appropriate, legally required, or where a role involves child-related work, Triple P Europe may:

- Conduct criminal history, working-with-children, or equivalent background checks.
- Require personnel to disclose matters that may affect their suitability to undertake child-related activities.
- Consider any safeguarding-related concerns identified during recruitment or screening processes.
- Refuse, limit or terminate engagement where safeguarding risks cannot be appropriately managed.

We recognise that safeguarding is an ongoing responsibility. All personnel are expected to comply with this Policy and notify Triple P Europe of any change in circumstances that may affect their suitability for roles involving contact with children or access to children's information.

As part of our onboarding processes, we provide staff with a copy of this Child Protection (Safeguarding) Policy and child safeguarding training, to ensure all personnel understand their safeguarding responsibilities.

TRAINING AND AWARENESS

Triple P EU is committed to ensuring all employees, contractors, and volunteers understand their responsibilities in maintaining a child-safe environment. All personnel will receive child safeguarding training appropriate to their role. Training covers:

- Triple P EU's child safeguarding responsibilities and expectations.
- The types and indicators of child abuse, neglect, exploitation, and harm.
- Appropriate and inappropriate behaviour when interacting with children while at work.
- How to respond to disclosures, allegations, or concerns about a child's safety or wellbeing.
- How and when to report child safety concerns in accordance with this Policy.

Child safeguarding training is incorporated in our onboarding process for new starters and is refreshed periodically to ensure personnel remain aware of their responsibilities and reporting obligations.

CHILD PARTICIPATION AND CONSENT

Triple P EU does not typically interact with children, except for the purposes of recording images, footage and testimonials which we use for marketing purposes. Images of children will only be collected, used, and published (including on our website or social media) with the parent or legal guardian's express prior consent and in a manner that preserves the child's dignity, privacy, and safety. The parent or legal guardian must also be present while the photography or filming takes place.

DATA PROTECTION AND ARTIFICIAL INTELLIGENCE (AI) USE

Triple P Europe is committed to protecting the privacy, confidentiality and security of personal information relating to children, young people, parents, carers, staff and other stakeholders. We will:

- Comply with applicable data protection and privacy laws, including the General Data Protection Regulation (GDPR) and any relevant national legislation.
- Collect, use, store and disclose personal information only where there is a lawful basis for doing so.
- Ensure that personal information is handled fairly, transparently and securely.
- Limit access to personal information to those who require it for legitimate business, safeguarding, legal or service-delivery purposes.
- Implement appropriate technical and organisational measures to protect personal information from unauthorised access, loss, misuse, alteration or disclosure.
- Only retain personal information for as long as necessary to fulfil the purpose for which it was collected and to meet legal, regulatory or contractual obligations.
- Ensure that any sharing of personal information is proportionate, necessary and undertaken in accordance with applicable law and organisational procedures.
- Where Triple P EU collects information about a child, that data is collected directly from and with the consent of the child's parent or legal guardian. The only exception being in safeguarding matters where we are contacted by a child or other concerned adult.
- Parents/guardians are provided with privacy notices that explain how their child's personal data will be collected, processed, stored, secured and shared. On request, we will provide child friendly versions of the Privacy Notices.
- We do not use automated decision-making for decisions affecting children.

Where concerns arise regarding the safety or wellbeing of a child, personal information may be shared with appropriate authorities or professionals where necessary to protect the child or comply with legal obligations.

The GDPR and data protection laws of the EU Member States are designed to protect the rights of individuals, including children, regarding their personal data. These include the right to have access to their personal data, to correct inaccurate data or to have their data erased. Triple P Europe recognises that children are entitled to the same data protection rights as adults under the GDPR and other applicable privacy laws. We are committed to supporting children to exercise those rights and, where a child submits a subject access request or other data rights request, we will engage with them using clear, age-appropriate language and processes to help them understand their rights and our response.

Any child safety concerns regarding our use of personal information and technology should be reported in accordance with the reporting procedures set out in this policy. They may also be reported to our Data Protection Officer at dpo@triplep.net.

Use of Artificial Intelligence

Triple P Europe recognises that artificial intelligence (AI) and automated technologies can provide valuable support in the delivery of services and business operations. However, child safety takes precedence over operational convenience, technological innovation and organisational interests. For this reason, will not enter a child's personal information into generative AI systems. Nor do we use AI-enabled processes to make decisions regarding children. Our decision not to process children's information using AI is guided by the best interests of the child.

POLICY BREACHES

Everyone at Triple P EU must comply with this policy. Non-compliance may result in disciplinary action, contract termination and reporting to law enforcement where required.

REVIEW AND MONITORING

Triple P EU will review this Policy and associated procedures annually, or sooner where required due to changes in applicable legislation, regulatory requirements, organisational activities, or identified safeguarding risks.

In addition, Triple P EU will undertake a child protection risk assessment whenever:

- There is a significant change to applicable child protection, safeguarding, privacy, or related laws and regulations.
- There is a change in the types of personal information collected, used, stored, or disclosed by Triple P EU in relation to children.
- Triple P EU commences delivering services directly to children.
- New programs, services, partnerships, research activities, or operational practices are introduced that may create new or increased risks to children.

The outcomes of policy reviews and risk assessments will be used to ensure that safeguarding measures remain effective, proportionate and aligned with legal requirements and organisational best practice.

In preparing this policy, we considered international child safety standards such as the United Nations Convention on the Rights of the Child and EU and Dutch laws and regulations including the Dutch Criminal Code.