CHILD PROTECTION POLICY

Društvo za psihološko svetovanje Kameleon (Association of psychological counselling Kameleon), Slovenia

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Adopted	24 October 2026, by the Board of Društvo Kameleon
Next review	Two years from adoption, or earlier following an incident or a change in law
Publication	Published in full at svetovalnicakameleon.si and provided to every staff member, volunteer, partner and contractor

1. Purpose and scope

Društvo Kameleon provides psychological counselling, support groups and preventive psychoeducational activities. Part of this work brings us into contact with children, meaning any person under the age of 18. This policy sets out what we do to make sure that contact is safe, and what we do when it is not.

The policy applies without exception to everyone acting in the name of the association: board members, employees, volunteer counsellors, students on placement, external trainers, contractors, researchers, interpreters and project partners working with us on our activities. It applies to in-person work, to online counselling by chat, e-mail and video call, to workshops and lectures in schools and youth settings, and to our communication channels and social media.

It is structured around the four standards of the Keeping Children Safe Child Safeguarding Standards: Policy, People, Procedures and Accountability.

2. Our commitment

We recognise that every child has the right to protection from all forms of violence, abuse, neglect and exploitation, and that this right does not depend on the child's age, sex, gender identity, sexual orientation, disability, ethnicity, religion, migration status or family situation.

We accept that the responsibility for a child's safety rests with the adults around the child and never with the child. We accept that abuse occurs in organisations like ours as well as in families, and that a policy is worth nothing unless people are willing to act on it. We commit to act on every concern, including concerns about our own people.

We act in the best interests of the child, we listen to children and take what they tell us seriously, we work in an age-appropriate and non-judgemental way, and we do not promise a child secrecy that we cannot keep.

3. Legal and professional framework

This policy is grounded in the following instruments.

- UN Convention on the Rights of the Child, in particular Articles 3, 12, 19 and 34, and General Comment No. 13 (2011) on the right of the child to freedom from all forms of violence.
- Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention) and the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention).
- Directive (EU) 2024/1385 on combating violence against women and domestic violence, including the criminalisation of non-consensual sharing of intimate images, cyber-harassment, cyberstalking and cyber-incitement to hatred.
- Regulation (EU) 2016/679 (GDPR) and the Slovenian Personal Data Protection Act, together with the Digital Services Act framework on the protection of minors online.
- Slovenian law: Zakon o preprečevanju nasilja v družini, under which every organisation and individual is obliged to notify the competent centre for social work, the police or the state prosecutor of suspected domestic violence against a child, irrespective of the child's or the family's consent; the Criminal Code provisions on the failure to report a criminal offence; the Social Assistance Act as it applies to counselling services; and the Protection of Whistleblowers Act.
- Professional standards: the Code of Professional Ethics of Slovenian Psychologists, the EFPA Meta-Code of Ethics, and the EFPA recommendations on the provision of psychological services through digital and remote means, which govern consent, confidentiality, competence, identification and crisis management in online work.

Where this policy and a professional duty of confidentiality appear to conflict, the safety of the child takes precedence. Confidentiality is not a ground for withholding a report of suspected abuse.

Standard 1. Policy

1.1 A written, public commitment

This document is the association's written child protection policy. It is approved by the Board, published in full and in plain language on our website, and made available to any child, parent, partner institution or member of the public who asks for it.

1.2 What we treat as harm

For the purposes of this policy, harm includes physical violence, psychological and emotional abuse, neglect, sexual abuse and exploitation, peer violence and bullying, and technology-facilitated harm. The last category includes online harassment and pile-ons, cyberstalking, grooming, sextortion, the non-consensual sharing of intimate images including synthetic or manipulated images, and exposure to content that normalises violence or contempt on the basis of sex or gender.

We also treat as a safeguarding matter any conduct by our own people that breaches the code of conduct in Standard 2, whether or not it has yet caused identifiable harm.

1.3 Risk assessment

Before any activity involving children, the person responsible for that activity carries out and records a short risk assessment covering the setting, the ratio of adults to children, the presence of other responsible adults, the online tools used, and the foreseeable disclosures the activity may prompt. Preventive work on violence, consent and gender norms is expected to prompt disclosures, and activities are planned on that assumption rather than treating disclosure as an exception.

Standard 2. People

2.1 Recruitment and selection

Safe recruitment applies to paid staff, volunteers, students on placement and external trainers alike. Our procedure is as follows.

- Every role that involves contact with children is advertised with an explicit statement that the association operates a child protection policy and that selection includes safeguarding checks.
- Candidates complete a written application and a structured interview which includes questions on their understanding of boundaries, power and confidentiality in work with minors.
- We verify professional qualifications and, for psychologists and counsellors, the relevant academic degree and any supervision arrangements.
- In their application, candidates briefly state whether they have worked with children and young people before, and in which organisation. We do not require professional references: given the size of the association, we rely on the signed declaration below, on induction training before any contact with children, on mentorship and review of their work during their first three months, and on regular supervision and intervision.
- Every person who will work directly with children signs a declaration that they have not been convicted of, and are not subject to criminal proceedings for, an offence against life and limb, sexual integrity or a child, and that they will tell us at once if that changes. The declaration is renewed once a year and kept on file.
- Where a school, a partner institution or a funder requires an official certificate of non-conviction from the Ministry of Justice, we obtain it for every person taking part in that activity before the activity begins.
- We ask candidates to disclose any previous disciplinary or safeguarding proceedings against them. Non-disclosure is itself a ground for exclusion.
- Appointment is conditional on signing this policy and the code of conduct below. Nobody works with children before that signature is on file.
- Experience of working with children is not a condition of appointment. Everyone completes the induction training before any contact with children and takes part in regular supervision and intervision.
- Work with children takes place in agreed settings, in the school or on the association's own channels, and is recorded; nobody works with children privately, outside agreed settings or through their own personal accounts. A new person works under mentorship for the first three months, which means that their work is reviewed regularly and discussed in a recorded review at the end of that period.

2.2 Code of conduct

Everyone acting for Društvo Kameleon undertakes to:

- treat every child with respect, and never to use language or behaviour that is humiliating, sexualised, discriminatory or frightening;
- hold individual sessions in the association's agreed premises or on its own channels, never in a private home, an informal setting or outside agreed hours, and record every session in the association's register;
- keep contact with a child inside the association's official channels, and never to move a professional relationship onto a private phone number, private social media account or private messaging app;
- never to give or accept gifts, money, favours or private meetings outside the professional relationship, and never to offer transport in a private vehicle other than in an emergency and with the knowledge of the Focal Point;
- never to photograph or film a child, or use a child's words, image or case material in publicity, teaching or research, without informed written consent from the child and, where required, the holder of parental responsibility;
- never to promise a child unconditional secrecy, and to explain the limits of confidentiality at the start of contact in language the child can understand;
- report any concern, disclosure or suspicion under Standard 3 without delay, including where it concerns a colleague.

2.3 Training and support

Every person working with children receives induction training on this policy before beginning work, and refresher training at least every two years. Training covers recognition of abuse and of technology-facilitated harm, how to receive a disclosure, the reporting route, boundaries in online work, and the duty to report.

Counsellors have access to regular supervision and intervision. Anyone who has received a disclosure or been involved in a report is offered a debriefing and supervision, because handling this material carries a cost for the professional as well.

Standard 3. Procedures

3.1 Receiving a disclosure

When a child discloses harm, the person receiving the disclosure listens without interrogating, does not press for detail beyond what the child offers, does not express shock or judgement, tells the child clearly that they were right to speak and that the information will have to be passed on to keep them safe, and makes a written record of the child's own words as soon as possible afterwards. We do not investigate. Establishing what happened is the task of the competent authorities.

3.2 Reporting

Any concern, disclosure or suspicion is reported to the Child Protection Focal Point on the same day. The Focal Point decides on the notification without delay and in any event within 24 hours.

Suspected violence, abuse or neglect of a child is notified to the competent centre for social work (center za socialno delo), and where a criminal offence is suspected, to the police. This obligation applies irrespective of the consent of the child or of the family.

Where a child is in immediate danger, emergency services are called first (112, or the police on 113) and the internal report follows.

Where the concern involves a person acting for the association, it is reported directly to the President of the association and to the Board, the person concerned is immediately suspended from all contact with children pending the outcome, and the external notification is made in the same way as for any other concern. No internal enquiry delays or replaces the external report.

Where the concern involves the President or the Focal Point, the report goes to any other Board member, who notifies the external authorities directly.

A child is told, in an age-appropriate way, what will happen next. Nobody in the association is permitted to decide alone that a concern is too minor to report.

3.3 Online and remote work

Our online counselling is anonymous by design, which limits what we can verify and what we can do in a crisis. We manage this as follows.

- At first contact, users are informed in plain language what the service is, what is confidential, and in which circumstances we are obliged to act.
- Counsellors are trained to ask, when risk indicators appear, for the minimum information needed to make help possible, while recognising that a child may refuse and that refusal is not a reason to end support.

- Where a child discloses abuse or is in danger, the counsellor follows the reporting route above with whatever identifying information exists, and in parallel gives the child direct routes to help: TOM telephone for children and adolescents on 116 111, emergency services on 112, the police on 113, and the local centre for social work.
- Counsellors work from secure devices and accounts, never from shared or public computers, and never store session material outside the association's systems.
- Where an activity involves group work online, sessions are not recorded unless every participant and, where required, the holder of parental responsibility has consented in writing, and recordings are deleted at the end of the agreed retention period.

3.4 Consent and information

Children receive information about the service, confidentiality and its limits in language appropriate to their age before any activity begins. Where the law or the nature of the activity requires the consent of a holder of parental responsibility, that consent is obtained and recorded in writing.

From the age of 15, the young person's own written assent is obtained alongside the consent of the holder of parental responsibility, in line with Slovenian practice. A young person who declines does not take part, whatever a parent has signed.

Where a child takes part in research, evaluation or pilot activities, separate informed consent is obtained, participation is voluntary, and withdrawal at any point carries no consequence for the support the child receives.

3.5 Records, data and confidentiality

Records relating to children are kept to the minimum necessary, stored securely with access limited to those who need it, and processed in accordance with the GDPR and national data protection law. They are retained only as long as is necessary for the purpose for which they were collected; the Board sets the retention periods and reviews them at its annual review. Safeguarding records are kept separately from general counselling notes. Information is shared on a need-to-know basis, and sharing with the competent authorities for the protection of a child is a lawful and necessary disclosure, not a breach of confidentiality.

3.6 Complaints

Any child, parent, partner or member of the public may raise a concern or complaint about the conduct of anyone acting for the association, by e-mail to the association or directly to the Focal Point. Complaints are acknowledged within five working days, and a complaint that raises a child protection concern is dealt with under section 3.2 rather than as an ordinary complaint.

A child does not have to come to us first. A concern can also be taken directly to TOM, the telephone for children and adolescents, on 116 111, to the Human Rights Ombudsman of the Republic of Slovenia and its child advocacy service, to the competent centre for social work or to the police. These routes are named in the short version written for young people.

Anyone who raises a concern in good faith is protected, including under the Protection of Whistleblowers Act, and we treat retaliation against them as a disciplinary matter. This applies to our own volunteers as much as to anyone else.

3.7 Images and public communication

The association does not publish identifiable images of children on its website or on social media. Where an activity is documented, we use photographs in which no child can be identified, or illustrations, unless written consent has been given by the child and, where required, by the holder of parental responsibility; material is withdrawn at once if consent is withdrawn.

Nothing a child has told a counsellor is used in communication, teaching or fundraising, even in anonymised form, without separate written consent. Material created by young people in our activities is published only with their consent and on terms they have understood.

Standard 4. Accountability

4.1 Responsibility

The Board of Društvo Kameleon carries overall responsibility for this policy. The Board appoints a named Child Protection Focal Point, whose name and contact details are published alongside this policy, and a named deputy for periods of absence. The Focal Point is responsible for receiving internal reports, deciding on external notification, keeping the safeguarding record, and reporting annually to the Board.

4.2 Implementation and monitoring

- This policy is signed by every person who works with children, and the signatures are kept on file.
- The Focal Point keeps a confidential log of concerns raised, actions taken and notifications made.

- The Board reviews implementation once a year, including whether training is up to date, whether the declarations and, where required, the certificates have been obtained for every relevant person, and whether any concern was handled outside the procedure.
- Children and young people who take part in our activities are asked for their views when the policy is reviewed, and the short version written for them is revised with them.
- The policy is reviewed at least every two years, and immediately after any serious incident or change in the applicable law.

4.3 Projects and partners

In projects carried out with partners, we require that the child protection arrangements of the project are at least equivalent to those in this policy, we agree in writing before activities begin who is responsible for safeguarding in each country and setting, and we make sure that every person delivering activities with children knows the reporting route that applies locally. Where we work on the premises of a school or another institution, we follow that institution's protocol in addition to our own, and in case of conflict we apply the stricter standard.

This policy applies in full to activities carried out in projects funded by the European Union, including work with pupils in schools, and we accept the safeguarding requirements of the funding programme and of the project coordinator where these go further than our own.

Any serious safeguarding incident arising in a project activity is reported to the project coordinator without delay, after the external notification has been made and in accordance with data protection law. No personal data of a child is shared with the coordinator.

4.4 Transparency

This policy is published in full on our website in Slovenian and English. Children and young people are given a short, plain-language version explaining what they can expect from us, what is not acceptable from any adult, and how to complain, inside or outside the association.

Approved by the Board of Društvo za psihološko svetovanje Kameleon on 24 October 2026.