



Inštitut za proučevanje enakosti spolov
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CHILD PROTECTION POLICY

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1 INTRODUCTION

1.1 About IPES

Inštitut za proučevanje enakosti spolov – IPES (*Gender Equality Research Institute*) is an independent research and advocacy organisation dedicated to advancing gender equality, social justice, human rights, and inclusive participation in society. IPES works across the fields of education, youth participation, civic engagement, research, policy development, community work, and awareness-raising activities aimed at challenging structural inequalities, discrimination, stereotypes, and harmful social norms.

As part of its activities, IPES may engage directly or indirectly with children and young people through educational programmes, workshops, consultations, research activities, awareness campaigns, events, digital platforms, participatory processes, and international projects. IPES recognises that all children have the right to protection, participation, dignity, safety, and wellbeing in every environment in which they are involved.

IPES acknowledges its responsibility to create and maintain a safe, inclusive, respectful, and empowering environment for all children participating in its activities, regardless of gender, sex, age, disability, ethnicity, nationality, migration status, religion, language, sexual orientation, socioeconomic background, or any other personal circumstance.

1.2 Purpose of the Child Protection Policy

This Child Protection Policy (CPP) establishes the principles, standards, responsibilities, and procedures through which IPES prevents and responds to all forms of violence, abuse, exploitation, neglect, discrimination, or harm involving children. The purpose of CPP is to:

- safeguard and promote the rights, dignity, wellbeing, and best interests of every child involved in IPES activities;
- ensure that all children are treated as rights holders in accordance with international human rights standards;
- establish clear safeguarding standards and behavioural expectations for all individuals representing or working with IPES;
- prevent all forms of child abuse, neglect, exploitation, harassment, discrimination, and unsafe practices;
- ensure timely, appropriate, confidential, and child-centred responses to concerns, allegations, disclosures, or incidents involving children;

- promote meaningful, safe, inclusive, and ethical participation of children in the design, implementation, evaluation, and dissemination of activities affecting them;
- ensure accountability and compliance with European Union, international, and national child protection standards;
- strengthen organisational safeguarding culture and risk prevention mechanisms across all IPES activities and partnerships.

This CPP reflects IPES' commitment to zero tolerance for any form of violence, abuse, exploitation, neglect, or harmful conduct towards children.

1.3 Legal and policy framework

CPP is grounded in international, European Union, and national legal frameworks related to children's rights, safeguarding, equality, and human dignity, including but not limited to:

- UN Convention on the Rights of the Child and its Optional Protocols;
- General Comment No. 13 (2011) of the UN Committee on the Rights of the Child on the right of the child to freedom from all forms of violence;
- the European Union Charter of Fundamental Rights (Art. 21 and Art. 24);
- the General Data Protection Regulation (GDPR);
- the Constitution of the Republic of Slovenia;
- the Domestic Violence Prevention Act of the Republic of Slovenia;
- the Code of Ethical Principles in Social Protection of Slovenia;
- the Keeping Children Safe Child Safeguarding Standards;
- all other applicable Slovenian and European legal frameworks concerning child rights, equality, anti-discrimination, participation, privacy, and protection from violence.

1.4 Scope and applicability

This CPP applies to all individuals acting on behalf of, representing, collaborating with, contracted by, or participating in activities organised, implemented, funded, coordinated, or supported by IPES. This includes all employees and management representatives of IPES; members of governing and advisory bodies; interns, trainees, volunteers, and youth workers; consultants, trainers, facilitators, researchers, educators, experts, and external collaborators; partner organisations and subcontractors; donors, sponsors, media representatives, and visitors participating in IPES activities involving children; interpreters, photographers, videographers, and communication professionals; accompanying adults, guardians, or caregivers participating in activities involving children; all online and offline environments

connected to IPES activities, including digital communication, social media, online workshops, research activities, consultations, campaigns, and events.

CPP applies equally to direct contact with children; indirect contact with children; in-person activities; online and hybrid environments; domestic and international activities; formal and informal educational settings; project planning, implementation, communication, dissemination, monitoring, and evaluation activities.

All individuals covered by this CPP are required to familiarise themselves with its contents and comply fully with its principles, standards, procedures, and reporting obligations.

1.5 Guiding principles

Best interests of the child: The best interests of the child shall be a primary consideration in all decisions, actions, procedures, and activities involving children.

Child participation: Children have the right to express their views freely in all matters affecting them, and their views must be given due weight according to their age, maturity, and evolving capacities.

Non-discrimination: All children have equal rights to protection, participation, dignity, and inclusion without discrimination of any kind.

Zero tolerance: IPES maintains zero tolerance for all forms of child abuse, exploitation, neglect, harassment, discrimination, violence, or harmful conduct.

Do no harm: All activities must be designed and implemented in ways that minimise risks and prevent physical, emotional, psychological, social, or digital harm to children.

Accountability: All persons representing IPES are responsible for safeguarding children and reporting concerns, suspicions, or violations.

Confidentiality and data protection: Information concerning children and safeguarding concerns shall be handled sensitively, securely, ethically, and in accordance with data protection standards.

Safe and meaningful participation: Children's participation must be voluntary, inclusive, informed, respectful, accessible, and safe at all times.

Prevention and risk management: Safeguarding measures must be integrated into organisational culture, project planning, recruitment, implementation, communication, and partnerships.

2 DEFINITIONS

For the purposes of this CPP, the following definitions apply:

2.1 Child

A child is any person under the age of 18, in accordance with the United Nations Convention on the Rights of the Child (UNCRC), unless national legislation specifies an earlier age of majority.

2.2 Child protection / child safeguarding

Child protection or child safeguarding refers to the policies, procedures, standards, preventive measures, and organisational practices aimed at protecting children from all forms of violence, abuse, neglect, exploitation, discrimination, harassment, or harm. Safeguarding includes both preventive and responsive actions designed to ensure that children participating in IPES activities are safe, respected, protected, and supported at all times.

2.3 Child abuse

Child abuse refers to all forms of physical, emotional, psychological, or sexual abuse, neglect, negligent treatment, exploitation, coercion, trafficking, harmful practices, or commercial exploitation that result in actual or potential harm to a child's health, dignity, development, wellbeing, or safety. Child abuse may occur in person or online and may be perpetrated by adults or other children. Forms of abuse include, but are not limited to: (1) physical abuse (the intentional use of physical force that results in, or may result in, injury, pain, suffering, or harm to a child); (2) emotional or psychological abuse (persistent behaviour that harms a child's emotional wellbeing, self-esteem, identity, confidence, or development, including intimidation, humiliation, threats, manipulation, verbal abuse, isolation, or rejection); (3) sexual abuse and exploitation (any actual or attempted sexual activity involving a child, including grooming, coercion, sexual harassment, inappropriate touching, online exploitation, production or sharing of sexual content involving children, or any sexual activity where consent cannot be freely given); (4) neglect (failure to provide adequate care, supervision, protection, emotional support, education, healthcare, nutrition, or safe living conditions necessary for a child's wellbeing and development); (5) peer-to-peer abuse (abuse occurring between children, including bullying, harassment, sexual

violence, intimidation, discrimination, online abuse, exploitation, or harmful behaviour); (6) online or digital abuse (any abuse facilitated through digital technologies, including cyberbullying, online grooming, exploitation, harassment, sharing of harmful content, unauthorised use of images, or violations of privacy).

2.4 Child participation

Child participation refers to the right of children to express their views, opinions, experiences, and perspectives freely in matters affecting them, and to have those views taken seriously in accordance with their age, maturity, and evolving capacities. Participation must always be voluntary, informed, inclusive, safe, meaningful, respectful, age-appropriate, and free from coercion, manipulation, discrimination, or retaliation.

2.5 Direct contact with children

Direct contact refers to being physically or virtually present with children as part of IPES activities, whether contact is regular or occasional, short-term or long-term. Examples include workshops, training activities, interviews, consultations, mentoring, educational activities, youth participation activities, online sessions, and research activities involving interaction with children.

2.6 Indirect contact with children

Indirect contact refers to situations where individuals may not work directly with children but may have access to children's personal data, photographs or videos, safeguarding information, research data, stories or testimonials, project documentation involving children.

2.7 Disclosure

Disclosure refers to a situation in which a child communicates, directly or indirectly, that they have experienced harm, abuse, exploitation, neglect, or unsafe behaviour.

2.8 Consent

Consent refers to freely given, informed, specific, and voluntary agreement. For activities involving minors, informed consent must be obtained from parents, legal guardians, or authorised representatives where required by law, alongside the child's own informed assent and willingness to participate. Children have the right to withdraw participation at any time without negative consequences.

3 CHILD PROTECTION POLICY STATEMENT

IPES is fully committed to safeguarding and promoting the rights, dignity, safety, wellbeing, and participation of all children involved in its activities. IPES commits to safeguarding children through the following core safeguarding pillars:

I) Awareness

IPES will ensure that all employees, volunteers, consultants, partners, and individuals associated with the organisation are aware of:

- children's rights;
- safeguarding responsibilities;
- forms and indicators of abuse;
- safeguarding risks in physical and digital environments;
- appropriate behaviour when working with children;
- reporting obligations and procedures.

II) Prevention

IPES will take proactive measures to minimise risks and prevent harm to children through:

- safer recruitment and vetting procedures;
- safeguarding training and awareness-raising;
- risk assessments for activities involving children;
- safe supervision and management practices;
- child-safe communication and media practices;
- safe participation procedures;
- regular monitoring and review of safeguarding practices.

Safeguarding considerations will be integrated into project planning, implementation, partnerships, communication, research, events, travel, and digital engagement.

III) Reporting

IPES will ensure that all individuals associated with the organisation understand:

- how to recognise safeguarding concerns;
- how and where to report concerns, suspicions, allegations, disclosures, or incidents;
- their obligation to report concerns promptly;
- confidentiality and data protection requirements;
- child-friendly and accessible reporting mechanisms.

All safeguarding concerns will be taken seriously, documented appropriately, and handled in accordance with established safeguarding procedures.

No person reporting a safeguarding concern in good faith shall face retaliation, discrimination, or negative consequences.

IV) Responding

IPES will ensure that timely, appropriate, confidential, and child-centred action is taken when safeguarding concerns arise. Responses shall:

- prioritise the best interests, safety, dignity, and wellbeing of the child;
- ensure that children are listened to respectfully and taken seriously;
- minimise further harm or retraumatisation;
- involve parents, guardians, authorities, or specialised services where appropriate and safe;
- comply with national legislation and reporting obligations;
- ensure confidentiality and data protection;
- include appropriate organisational measures and disciplinary procedures where necessary.

Where concerns involve criminal conduct or immediate risk of harm, IPES may report the matter to competent authorities in accordance with Slovenian law and safeguarding obligations.

4 CODE OF CONDUCT

All individuals covered by this CPP must act professionally, ethically, respectfully, and responsibly towards children at all times. All interactions with children must:

- respect children's dignity, rights, wellbeing, privacy, and participation;
- promote safe, inclusive, and non-discriminatory environments;
- avoid any behaviour that could cause harm, distress, fear, humiliation, exploitation, or discomfort;
- be guided by the best interests of the child.

4.1 Prohibited conduct

Individuals representing IPES must never:

- engage in any form of physical, emotional, psychological, or sexual abuse;
- hit, assault, physically punish, or use any force against a child;
- humiliate, shame, intimidate, threaten, manipulate, degrade, or verbally abuse a child;

- develop sexual, exploitative, inappropriate, or emotionally dependent relationships with children;
- engage in grooming behaviour or boundary violations;
- communicate with children in inappropriate, offensive, discriminatory, sexually suggestive, manipulative, or exploitative ways;
- engage in inappropriate online communication or contact with children outside professional contexts;
- share personal contact information or communicate privately with children through personal social media accounts unless explicitly authorised and safeguarded;
- discriminate against children on any grounds;
- favour particular children in ways that are inappropriate or exclusionary;
- expose children to harmful, inappropriate, violent, discriminatory, or sexualised content;
- take, store, share, publish, or use photographs, videos, recordings, or personal information of children without proper consent and safeguarding measures;
- use images or stories of children in ways that are exploitative, stereotypical, degrading, sensationalist, or harmful;
- consume alcohol or drugs, or be under their influence, while responsible for children;
- stay alone with a child in isolated or unsupervised environments where avoidable;
- transport children alone without prior authorisation and safeguarding considerations;
- ignore, minimise, conceal, or fail to report safeguarding concerns;
- retaliate against individuals reporting safeguarding concerns;
- encourage, condone, or participate in illegal, unsafe, discriminatory, abusive, or exploitative behaviour involving children.

This list is not exhaustive. Any behaviour that places a child at risk or undermines their dignity, safety, rights, or wellbeing is prohibited.

4.2 Media, communication, and digital safeguarding

When communicating about or involving children in media, communication, or digital activities, individuals representing IPES must:

- prioritise children's dignity, safety, privacy, and best interests;
- obtain appropriate informed consent before collecting or using images, recordings, or personal information;
- avoid identifying children unnecessarily;
- avoid publishing sensitive personal information;
- ensure that images and stories present children respectfully and accurately;

- avoid reinforcing stereotypes, discrimination, victimisation, or sensationalism;
- use secure digital platforms and communication tools;
- follow safeguarding procedures during online activities and communication.

4.3 Duty to report

All individuals covered by this CPP have a duty to report safeguarding concerns, suspicions, allegations, unsafe practices, or breaches of this Code of Conduct.

Failure to report safeguarding concerns may constitute a breach of this CPP and may result in disciplinary action.

5 IMPLEMENTATION AND PROCEDURES

5.1 Responsibility for implementation

IPES is responsible for ensuring the effective implementation, monitoring, and continuous improvement of this CPP. Overall responsibility for safeguarding implementation lies with the Director and programme Director of IPES, who shall together ensure that:

- safeguarding measures are integrated into organisational structures, activities, and partnerships;
- safeguarding responsibilities are clearly communicated;
- adequate safeguarding procedures and reporting mechanisms are established;
- safeguarding concerns are handled appropriately and without delay;
- staff and collaborators receive appropriate safeguarding information and training;
- safeguarding risks are assessed and mitigated across all activities involving children.

5.2 Recruitment, selection, and vetting

IPES is committed to safer recruitment practices designed to prevent individuals who may pose a risk to children from becoming involved in organisational activities. Recruitment and engagement procedures for employees, consultants, trainers, volunteers, interns, researchers, and other collaborators may include:

- assessment of suitability for working with children;
- review of professional experience and references;
- interviews addressing safeguarding responsibilities where relevant;
- criminal record or background checks where legally permissible and appropriate;
- review of previous safeguarding concerns where applicable;
- signing of the Code of Conduct prior to engagement.

All individuals engaged in activities involving children shall:

- receive information about safeguarding obligations;
- acknowledge their understanding of this CPP;
- commit to complying with safeguarding standards and reporting procedures.

Safeguarding considerations shall also be integrated into the selection and management of partner organisations, subcontractors, and external service providers.

5.3 Safeguarding training and awareness

IPES shall ensure that safeguarding awareness and training are proportionate to individuals' roles and responsibilities.

Safeguarding capacity-building may include:

- induction briefings;
- safeguarding guidance materials;
- awareness-raising sessions;
- training on recognising signs of abuse and safeguarding risks;
- reporting and response procedures;
- online and digital safeguarding;
- ethical communication and media practices involving children;
- child participation and child-rights-based approaches.

Safeguarding information shall be made accessible to:

- employees;
- volunteers and interns;
- consultants and external collaborators;
- partner organisations;
- children participating in activities, in age-appropriate formats where relevant;
- parents, guardians, or caregivers where appropriate.

5.4 Risk assessment and safe programming

Safeguarding risks shall be assessed and addressed before and during all activities involving children.

Risk assessments may consider:

- the nature and location of activities;
- supervision arrangements;
- online and digital risks;
- travel and accommodation arrangements;
- accessibility and inclusion considerations;
- communication methods;
- photography and media use;
- power imbalances and vulnerabilities;
- emergency and reporting procedures.

IPES shall take reasonable and proportionate measures to minimise identified risks and ensure safe participation environments.

5.5 Child participation and informed consent

IPES recognises children as rights holders and is committed to ensuring safe, meaningful, voluntary, and inclusive participation. Children participating in activities shall:

- receive age-appropriate information about activities and their rights;
- be able to express their views freely;
- participate voluntarily and without coercion;
- have the right to withdraw participation at any time;
- be treated respectfully and inclusively.

Where required, informed consent shall be obtained from:

1. parents or legal guardians; and/or
2. children themselves, through informed assent appropriate to their age and maturity.

Consent procedures shall include clear information regarding:

- the nature and purpose of activities;
- participation conditions;
- photography, video, or recording use;
- confidentiality and data protection;
- safeguarding and reporting procedures.

5.6 Reporting procedures

All safeguarding concerns, suspicions, allegations, disclosures, incidents, unsafe practices, or breaches of this CPP must be taken seriously and reported promptly.

Concerns may arise through:

- direct disclosure by a child;
- observation of behaviour or injuries;
- reports from third parties;
- inappropriate conduct by staff or others;
- online or digital incidents;
- breaches of safeguarding procedures.

All individuals covered by this CPP have a duty to report safeguarding concerns immediately or as soon as reasonably possible.

Safeguarding concerns should be immediately reported to:

Kaja Primorac, Director of IPES

If the concern involves the designated person or there is a conflict of interest, concerns should be reported to another senior representative of IPES or directly to competent authorities where appropriate.

Reports should include, where possible:

- factual and objective information;
- date, time, and location of the incident or concern;
- individuals involved;
- observations or disclosures made;
- actions already taken;
- immediate safety concerns.

5.7 Responding to safeguarding concerns

All safeguarding concerns shall be addressed promptly, confidentially, and in accordance with the best interests of the child. Responses may include:

- ensuring the immediate safety of the child;
- listening respectfully and without judgment;
- documenting concerns accurately;
- consulting appropriate safeguarding personnel;
- referral to specialised services or competent authorities where appropriate;
- communication with parents or guardians where safe and appropriate;
- internal safeguarding measures;
- suspension of individuals subject to allegations pending review where necessary.

IPES does not investigate criminal offences independently but may cooperate with competent authorities and relevant child protection services in accordance with Slovenian legislation.

Where there is immediate danger or risk of serious harm, emergency services or competent authorities shall be contacted without delay.

5.8 Confidentiality and data protection

All safeguarding information shall be handled confidentially, sensitively, securely, and in accordance with applicable data protection legislation, including the General Data Protection Regulation (GDPR). Information relating to safeguarding concerns shall only be shared:

- with authorised individuals;
- where necessary to protect a child;
- where legally required.

Confidentiality shall be balanced with the duty to protect children from harm.

Records relating to safeguarding concerns shall:

- be documented accurately;
- stored securely;
- protected against unauthorised access;
- retained in accordance with legal and organisational requirements.

Children and families shall be informed appropriately about safeguarding procedures, confidentiality limitations, and actions taken where possible and safe.

5.9 Partnerships and external organisations

Where IPES works with partner organisations, subcontractors, service providers, or external collaborators involving children, reasonable steps shall be taken to ensure that safeguarding standards are respected.

Partner organisations may be required to:

- comply with safeguarding obligations;
- demonstrate safeguarding procedures;
- adhere to equivalent safeguarding standards;
- report safeguarding concerns arising within joint activities.

IPES reserves the right to suspend or terminate cooperation where safeguarding concerns or serious breaches arise.

5.10 Breaches of the CPP

Failure to comply with this CPP or the Code of Conduct may result in:

- disciplinary procedures;
- suspension or termination of contracts or cooperation;
- removal from activities;
- referral to competent authorities where appropriate.

Serious breaches involving potential criminal conduct may be reported to law enforcement in accordance with applicable legislation.

5.11 Monitoring, review, and evaluation

IPES shall regularly monitor, review, and evaluate the implementation and effectiveness of this CPP and related safeguarding measures. Monitoring may include:

- review of safeguarding practices and procedures;
- assessment of safeguarding risks;
- analysis of incidents and responses;
- feedback from children, staff, and participants;
- evaluation of training and awareness activities;
- updates in response to legal, organisational, or operational developments.

The CPP shall be reviewed periodically and updated where necessary to ensure continued alignment with national, international, and European safeguarding standards.

In Maribor, 4. 5. 2026

Kaja Primorac, Director




APPENDIX 1 - IPES Child Safeguarding Code of Conduct Declaration

I acknowledge that I have received, read, understood, and agree to comply with the Child Protection Policy of IPES.

I understand that safeguarding children is a shared responsibility and that all children have the right to protection, dignity, safety, participation, privacy, and wellbeing.

I confirm that, while representing or working with IPES, I will:

- respect and promote the rights, dignity, wellbeing, and best interests of all children;
- contribute to creating safe, inclusive, respectful, and non-discriminatory environments for children;
- maintain professional and appropriate boundaries with children at all times;
- behave responsibly, ethically, and respectfully in both physical and online environments;
- comply with all safeguarding procedures, reporting obligations, and organisational standards;
- immediately report any safeguarding concern, suspicion, allegation, unsafe practice, or breach of safeguarding procedures;
- respect confidentiality and data protection obligations;
- ensure that participation of children is voluntary, safe, meaningful, and respectful;
- use photographs, videos, recordings, and personal information involving children only in accordance with consent and safeguarding procedures.

I understand that I must never:

- engage in any form of physical, emotional, psychological, or sexual abuse;
- use humiliating, degrading, discriminatory, manipulative, intimidating, or inappropriate language or behaviour;
- develop inappropriate, exploitative, or sexual relationships with children;
- engage in grooming behaviour or boundary violations;
- communicate with children inappropriately online or offline;
- share or publish images or information about children without appropriate consent and safeguarding measures;
- discriminate against any child;
- ignore, conceal, minimise, or fail to report safeguarding concerns;
- engage in conduct that could place a child at risk of harm or undermine their dignity or wellbeing.

I understand that failure to comply with the Child Protection Policy or this Code of Conduct may result in disciplinary measures, termination of cooperation, removal from activities, or referral to competent authorities where appropriate.

I declare that:

- I have not been convicted of offences involving violence against children, abuse, exploitation, or other conduct incompatible with working with children;
- I will immediately disclose any safeguarding concern or conflict relevant to my role;
- I understand my safeguarding responsibilities while representing IPES.

Full Name: _____

Position / Role: _____

Organisation (if applicable): _____

Signature: _____

Date: _____

APPENDIX 2 - Complaints and Reporting Procedure

IPES has established a complaint procedure to address situations in which children, parents/legal guardians, participants, or other service beneficiaries are dissatisfied with the conduct, procedures, safeguarding standards, or treatment by IPES staff, collaborators, volunteers, consultants, or programme implementers. The complaint procedure is intended to ensure that all complaints, concerns, objections, or safeguarding issues are addressed fairly, respectfully, confidentially, and without delay.

Complaints may relate to:

- inappropriate conduct or behaviour;
- dissatisfaction with programme implementation;
- discrimination, harassment, or exclusion;
- safeguarding concerns;
- unethical or unprofessional conduct;
- violations of children's rights or dignity;
- unsafe practices or environments;
- any other breaches of the Child Protection Policy.

Complaints may be submitted verbally or in writing.

Service beneficiaries, children, parents/legal guardians, and participants shall be informed about their right to make a complaint, available complaint mechanisms, safeguarding reporting procedures, and relevant ethical and legal protections.

Information regarding complaint procedures shall be made accessible during programme implementation and, where appropriate, displayed in locations where activities involving children take place.

1. First stage of the complaint procedure

In the first stage, a child participant, service beneficiary, parent/legal guardian, or their representative may submit a verbal or written complaint to the Director of IPES. The complaint should include, where possible:

- a description of the concern or incident;
- the date and location of the event;
- individuals involved;
- any actions already taken;
- the requested resolution or concern raised.

The Director of IPES shall review the complaint and provide a written response within a reasonable timeframe, including:

- clarification of the issue;
- proposed measures or solutions;
- safeguarding actions where relevant;
- explanation of procedures or decisions taken.

All complaints shall be treated seriously, respectfully, and confidentially, with due consideration for the best interests of the child.

2. Second stage of the complaint procedure

If the complainant is not satisfied with the response or proposed solution provided in the first stage, they may submit a further complaint or appeal to the governing body or authorised management representatives of IPES for additional review.

The complaint shall then be reviewed independently and additional measures, recommendations, safeguarding actions, or organisational decisions may be proposed where appropriate.

Where necessary, IPES may:

- consult external safeguarding professionals;
- seek mediation or independent review;
- cooperate with competent institutions or authorities;
- initiate internal safeguarding or disciplinary procedures.

The complainant shall be informed of the outcome within a reasonable timeframe, while respecting confidentiality and data protection obligations.

3. Third stage of the complaint procedure

If the complainant remains dissatisfied with the handling of the complaint, or believes that rights, ethical standards, or legal obligations have been violated, they may contact competent external authorities or institutions in accordance with Slovenian legislation.

This may include:

- social protection inspection authorities;
- child protection authorities;
- the Human Rights Ombudsman;
- law enforcement authorities;
- other competent institutions responsible for safeguarding, equality, anti-discrimination, or child rights protection.

Nothing in this procedure limits the right of any individual to report safeguarding concerns or suspected criminal conduct directly to competent authorities.

5. Record keeping

All complaints and safeguarding concerns shall be documented and securely stored by IPES. Records shall include:

- the nature of the complaint;
- actions taken;
- safeguarding measures implemented;
- outcomes and follow-up actions where relevant.

Documentation shall be handled confidentially and stored in accordance with data protection obligations and organisational procedures.