

CHILD PROTECTION POLICY



HRABRI telefon

Mali zaslužuju veliku pažnju.

BRAVE PHONE

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About Brave Phone

Brave Phone is a non-governmental, non-profit organization founded with the aim of providing direct help and support to abused and neglected children and their families, as well as working to prevent abuse and neglect as well as undesirable behavior of children and youth.

In its day-to-day work, the organization strives and makes efforts to achieve and promote positive changes in society, as well as its own growth and advancement in terms of professional quality standards in providing services to end users. It also takes care of its employees and volunteers, of whom more than 1 500 have been involved in the work of the Brave Phone so far.



In all its programs and projects, Brave Phone actively promotes the creation of a safe environment for children and condemns all forms of exploitation and abuse of children.

OBJECTIVES OF THE FOUNDATION BRAVE PHONE ARE:

- contribute to the common good, the development of positive and humane human values in society
- advocate and act in the field of creating a society in accordance with the needs of children and the guidelines of the UN Convention on the Rights of Children
- influence the reduction of violence against and among children
- improve the mental health of target groups as an area of public health interest
- organize various forms of preventive activities for children, young people and families in all areas of life important for members of these groups
- provide psychological counseling and support to child victims of violence
- inform the public and publicly advocate and encourage positive changes in society related to the status and position of the child in society, but also the family as a whole

IN ITS WORK, BRAVE PHONE IS GUIDED BY THE PRINCIPLES:

- *availability (all activities and services are free for end users);*
- *confidentiality (information about users is used exclusively for statistical processing and analysis and is not available to the public) and*
- *the best interests of the child (counseling and support are guided by this principle) to improve the mental health of target groups as an area of public health interest*

Introduction



The child protection policy is a binding document for all employees, associates and volunteers of Brave Phone who participate in direct and indirect work with children and play an active role in protecting their rights. Based on this document, Brave Phone in all its programs and projects strengthens its obligation to protect children from all forms of abuse and exploitation. This document defines the mechanisms for reporting and taking appropriate measures, as well as protocols for consistent action in child protection.

BRAVE PHONE WORKS IN ACCORDANCE WITH:

- The United Nations Convention on the Rights of the Child
- valid legal regulations in the Republic of Croatia
- The Statute of Brave Phone
- ethical codes of the profession (psychologists, social workers, etc.)
- Code of ethics for volunteers
- Code of ethics in research with children
- relevant scientific knowledge about all forms of abuse, neglect and exposure to family and peer violence in children and young people.

Brave Phone recognizes the potential danger of child abuse and exploitation by considering specific risk and protective factors for each individual child. The equal right to protection from abuse and exploitation is one of the fundamental principles of this policy. Every child is potentially at risk of abuse and exploitation and has the right to protection.

THE GOALS OF THE CHILD PROTECTION POLICY ARE:

- respect and promote the protection of children's rights
- to inform the members of Brave Phone and associates about the Child Protection Policy and provide them with guidelines for more efficient and safer work with children,
- ensure respect for the well-being of the child,
- ensure the protection of children from all forms of abuse and exploitation through timely recognition and response, as well as through prevention,
- provide organized and timely support to children and their families

Forms of abuse

PHYSICAL ABUSE

repeated or one-time, rough and intentional infliction of pain and physical injuries, as well as irresponsible behavior of parents and other persons that includes a potential risk of physical injury, the consequences of which may or may not be visible. Includes hitting the body with hands or objects, slapping, pulling hair, throwing on the floor, shaking roughly, inflicting burns or cuts, attempted strangulation or drowning, tying to pieces of furniture or similar objects, locking in isolated rooms, poisoning with food, drugs, alcohol and similar.

EMOTIONAL ABUSE

is the continuous hostile and/or indifferent behavior of parents and other persons acting from a position of power, based on which the child can conclude that he is worthless and unloved. Emotional abuse includes rejecting and humiliating a child, terrorizing and threatening violence, isolating and restricting freedom, excessive pressure and violation of personal boundaries, ignoring, emotional unavailability and witnessing violence in the family.

NEGLECT

is failure to satisfy the child's needs to an extent that significantly affects the child's physical and psychological development. It can be emotional, educational, physical and related to health.

SEXUAL EXPLOITATION

any attempt or act of abuse through the misuse of a position of vulnerability, power, or trust for sexual purposes, including but not limited to financial, social, or political gain from the sexual exploitation of another person.

SEXUAL ABUSE

any attempt or act of physical assault of a sexual nature, whether committed using force, under unequal or coercive conditions.

SEXUAL HARASSMENT

Any unwelcome conduct of a sexual nature that can reasonably be expected or perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile, or offensive work environment. Sexual harassment may occur in the workplace or in connection with work. Although it often involves a pattern of behavior, sexual harassment can also take the form of a single incident. In assessing the reasonableness of the expectation or perception, the viewpoint of the person experiencing abusive behavior must be taken into account.

ELECTRONIC VIOLENCE

is any intentional, continuous use of electronic and digital media (computers, smartphones, internet applications, social networks...) by an individual or group with the intention of causing harm or discomfort to others (dissemination of unpleasant or confidential information, publication of photographs and recordings without permission, social exclusion, privacy attacks, etc.).

FETAL ABUSE

includes excessive use of alcohol and addictive substances during pregnancy, excessive exercise by pregnant women and taking medicines that are not allowed.

SHAKEN BABY SYNDROME

is the violent shaking of a child by an adult (most often with the aim of soothing the child), which can cause bleeding in the brain and brain trauma.

MANIPULATION OF A CHILD IN CASE OF DIVORCE

is a set of behaviors and verbal and non-verbal messages by which a parent sends a child a negative message about the other parent to exclude him from the child's life and alienate the child from him, regardless of whether the child lives with that parent or the other, manipulation is possible by both parents.

WITNESSING DOMESTIC VIOLENCE

is when a child or young person in the family watches or listens to violent events, tries to protect one of the parents or observes injuries caused to the parent. Although sometimes the parent is not violent towards the child directly, life in a family where violence is witnessed can have serious consequences on the further psychophysical development of the child.

Prevention



Human resources

To ensure the safety of children and the ethical and timely implementation of all activities, Brave Phone implements a series of procedures when engaging associates and volunteers and selecting partners within its activities.

Employees

Candidates are required to go through the following process before being hired:

1

Before the interview:

- a) Submit your CV and motivation letter for a specific position to the e-mail address info@hrabritelefon.hr.
- b) Attach a certificate of no criminal record not older than 6 months.

The President of the Association and a member of the team from the area of the position for which the candidate is applying are obliged to review the submitted materials and to provide interview dates to candidates who meet

2

Interviewing candidates:

- a) The employee of the Association in charge of recruitment conducts an interview with candidates who meet the basic conditions for the job application at the agreed time.
- b) By signing the Employment Contract, the selected candidates agree to the terms of this Child Protection Policy, which they will be able to view earlier.

3

All employees of the Association sign the Code of Conduct for employees, associates and volunteers of the Brave Phone Association, which defines the procedures that ensure the protection of children and the Confidentiality Statement.

4

All employees of the Association are required to undergo basic education in the field of child protection, if they have not completed it as part of their regular or additional education, which is organized on average once a year in the Association.

Volunteers

The organization has developed specific conditions for volunteering in individual programs to ensure quality and safe access to children and families, the beneficiaries of the program.

1

Volunteers of the association attend or have graduated from faculties of humanistic orientation (psychology, social work, educational-rehabilitation, pedagogy or teacher's faculty), unless otherwise stipulated in the volunteer position.

2

After applying for volunteering, volunteers come for an interview with program coordinators or external collaborators.

3

Selected volunteers go through mandatory education. Mandatory topics of education are the specifics of working with children and parents, with an emphasis on prevention and recognition of signs of abuse and neglect, while other topics depend on the needs of a particular project or program.

4

Other conditions of volunteering are stipulated in the Volunteering Agreement, depending on the individual project or program of Brave Phone, which volunteers sign before starting volunteering.

5

All volunteers involved in direct work with children sign the Code of Conduct for employees, associates and volunteers of the Brave Phone Association and the Confidentiality Statement.

6

All volunteers are required to attach a certificate of criminal record not older than 6 months.

External associates

1

The external associates of Brave Phone are supervisors, educators, consultants, and other experts hired about the specific needs of current programs and projects.

2

The external associates of Brave Phone must have sensibility in the field of child protection, behave in a way that protects the safety and interests of children, and have adequate professional training specifically defined by the programs of Brave Phone.

3

Before carrying out activities on Brave Phone, all external collaborators sign the Confidentiality Statement and the Code of Conduct for employees, associates and volunteers of the Brave Phone Association.

4

All external associates are required to attach a Certificate of no criminal record not older than 6 months.

Partner and collaborative organizations

1

In the selection of partner and cooperating organizations, care is taken about the reputation and formal foundation of the organization in caring for the safety of children.

2

If the partner or cooperating organization does not have an existing document through which it ensures the safety of children, Brave Phone will initiate the inclusion of a section on the acceptance of Brave Phone's Child protection policy and mutual responsibilities for child protection in the partnership/cooperation agreement.

3

If a partner or cooperating organization violates any provision of the contract - acts to the detriment of children, Brave Phone will send a notification to the competent institutions about the violation of children's rights and consider terminating cooperation in the activity/project.

UNACCEPTABLE BEHAVIOUR IN WORKING WITH CHILDREN

All employees, volunteers, associates, and partners of the organization are required to uphold the highest standards of child protection.

The following behaviors are strictly prohibited and are considered serious violations of children's rights and the organization's internal rules. Such actions are subject to internal sanctions and, if necessary, will be reported to the competent authorities.

Physical and Sexual Violence

- Hitting or otherwise physically harming or abusing children.
- Establishing unnecessary physical contact with children (e.g., hugging, holding hands, sitting on laps – without clear consent and in inappropriate contexts).
- Engaging in or attempting to establish sexual contact with children, including physical, verbal, or online forms.
- Behaving in a sexually provocative or inappropriate manner in the presence of children.

Exploitation and Abuse

- Developing any relationship with a child that could be considered exploitative, manipulative, or abusive.
- Acting in a way that could place a child at risk of abuse, neglect, or harm.
- Ignoring a child's expressed concerns related to abuse, neglect, or feelings of insecurity.

Verbal and Emotional Abuse

- Using inappropriate, offensive, sarcastic, threatening, or degrading language when communicating with children.
- Behaving in a way that makes children feel ashamed, belittled, or emotionally hurt.
- Engaging in any form of emotional abuse, including threats, ignoring, or isolating a child.

Inadequate Response to Violence

- Failing to appropriately respond to illegal, dangerous, or violent behavior by:
 - o children toward peers,
 - o employees, volunteers, associates, partners toward children,
 - o parents or guardians toward their own or other children.

Discrimination and Unequal Treatment

- Discriminating against children based on gender, ethnicity, religion, language, disability, sexual orientation, social status, etc.
- Favoring a specific child or group of children while excluding others from activities or attention.

Violation of Privacy and Exposure to Harmful Content

- Publishing photos or videos of children without prior informed consent from the parent/guardian.
- Exposing children to inappropriate, disturbing, or harmful content (e.g., violence, pornography, hate speech).
- Sharing a child's personal information without legal or organizational justification.

Unprofessional Conduct

- Engaging in any dangerous, illegal, unethical, or abusive behavior toward children.
- Privately connecting with children through social media, sending them messages without the knowledge of parents/guardians or outside official communication channels.
- Acting outside the bounds of a professional relationship with a child, including offering personal services, gifts, or privileges without the organization's approval.
- The use of alcohol, tobacco, drugs, or other addictive substances is not tolerated in direct contact with beneficiaries or in any of the premises of Hrabri telefon.

RISKS IN WORKING WITH CHILDREN RELATED TO EMPLOYEES, VOLUNTEERS, AND EXTERNAL ASSOCIATES AND RISK MITIGATION MEASURES

Risks Originating from Adults (including Volunteers, Associates, and Staff Members)

Risk	Risk Mitigation Measure
Employment or engagement of individuals who may pose a risk to children	Mandatory background checks (certificate of no criminal record), thorough interviews and selection processes for employees, volunteers, and associates; probation period and ongoing performance evaluation
Lack of education on working with children	Regular training on children's rights, communication, and recognizing abuse and neglect; supervision sessions
Physical, emotional, or sexual abuse, inappropriate comments or behavior, or lack of professional boundaries; abuse of power	Clear guidelines on boundaries in interactions with children; Code of Conduct for employees, associates, and volunteers; Policy on Prevention of Sexual Exploitation and Abuse
Unclear procedures for reporting abuse	Familiarization with reporting procedures; provision of confidential reporting channels

Risks among children

Risk	Description	Risk Mitigation Measure
Peer violence (verbal, physical, emotional)	Insulting, exclusion, belittling among children	Establishing group behavior rules; volunteers regularly monitor group dynamics
Cyberbullying	Abuse via social media or messaging	Education on internet safety; clear rules and incident reporting procedures
Exclusion from activities	Children feel unaccepted, especially children with disabilities	Promoting inclusion; group facilitation training; individual support
Peer pressure / imitation of harmful behavior	Children mimic negative behavior patterns within the group	Activities that promote empathy, self-esteem, and critical thinking
Lack of respect for privacy	Intrusion into personal matters	Discussions on boundaries and privacy

Media cooperation



Recognizing the role of the media in improving the protection of children in Croatia, Brave Phone determines the rules of communication with the media that serve the purpose of protecting children.

1

Information provided by Brave Phone employees will be provided in a manner that respects the anonymity and dignity of children and parents.

2

The dignity of children who are users of Brave Phone will be respected by not featuring them in the media for the purpose of enhancing the publicity of the Association or media outlets.

3

The stories of children with whom the volunteers and employees of Brave Phone come into contact are used exclusively on a principled level, with identity protection, and exclusively for the purpose of sensitizing the public for child protection and to gain insight into the problems that children face and to initiate positive social changes.

4

Information provided by Brave Phone employees will be provided in a manner that respects the anonymity and dignity of children and parents.

5

In the case of the use of video material in which children participate, before the actual distribution, care will be taken that the children who are in the video clip or who participate in the video recording give their verbal consent, and their parents/guardians give their written consent to the recording.

6

If employees make statements or respond electronically to journalists' questions, before publishing the material in the media, Brave Phone will, if possible, request the article/video material for review.

7

If child personally participates in media appearances, the employee of Brave Phone in charge of the project in which child participates will arrange with the journalist in advance the questions that will be asked. If inappropriate questions are asked to the child, the employee will react and stop the recording. For personal participation in media appearances, it is necessary to obtain the written consent of the parent/guardian and the verbal consent of the child.

Reaction



Ways of acting in protection of children

If there is a suspicion or knowledge that a child is at risk, i.e. exposed to any form of abuse by a peer or an adult, the employees, collaborators and volunteers of Brave Phone in all programs and projects are obliged to:

- inform the program coordinator of the above and
- make a written note about suspicion or knowledge.

The program coordinator will inform the President of the Association about the situation. The coordinator and/or the president will invite the parents for a conversation and, in accordance with the regulations and laws on child protection, will independently inform the competent institutions about the situation.

To ensure the protection of children in all programs and projects, all employees, associates and volunteers of Brave Phone sign the Code of Conduct for employees, associates and volunteers of the Association Brave Phone, which confirms compliance with the Child Protection Policy of Brave Phone, i.e. the protocols and documents.

Procedures in individual programs are defined in detail by the following internal documents:

- Protocol of the work and conduct of the staff of the Family Power counseling center
- Protocol on handling in case of knowledge of domestic violence, child neglect and/or peer violence among children participating in the program of Community Center Borovje
- Protocol on dealing with crisis situations on the counseling helplines and written communication channels in the Brave Phone
- Memorandum on cooperation with the Center for Social Welfare Zagreb
- Memorandum of cooperation between the Ministry of the Interior affairs and the Brave Phone

REFERRAL OF CASES AND COOPERATION WITH OTHER ORGANIZATIONS AND INSTITUTIONS IN THE FIELD OF CHILD RIGHTS PROTECTION

Brave Phone holds the responsibility not only to provide support to children within its activities but also to respond promptly and involve external institutions when there is a suspicion of abuse, neglect, or serious risk to a child.

The procedures and actions are described in detail in the organization's response protocols for various situations.

When is a case referred to outside the organization?

A case is referred to the relevant institutions if:

- there is a suspicion of physical, emotional, or sexual abuse, or neglect,
- a child directly expresses concern for their own safety or the safety of other children,
- a staff member notices serious behavioral changes, physical injuries, or signs of stress that may indicate abuse,
- parents/guardians display behaviors that compromise the child's well-being

Where is the case referred to?

Examples of institutions to which cases may be referred:

- Centers for Social Welfare – in cases of reported abuse/neglect, including suspected cases
- Police – in urgent situations or when immediate action is required (e.g., threats to life/safety) and in cases of reported or suspected abuse/neglect
- Family doctor, psychologist, pediatrician – when medical assessments or additional psychological support are needed
- School/kindergarten/other specialized institutions or organizations – for coordination and ongoing monitoring of the child's well-being

Who reports the case within the organization?

- Reports are always submitted by the Program Coordinator in agreement with the President of the association following internal protocols.
- Persons working directly with children (volunteers, external associates) are required to immediately report any suspicion within the organization – not directly to institutions, except in urgent situations.

Documentation and Confidentiality

- All conversations, suspicions, and actions related to the case are documented in writing and stored confidentially.
- Information is shared only with relevant people/institutions and in the best interest of the child.

PROCEDURES FOR THE PROTECTION OF CHILDREN'S DATA

- Data protection is based on applicable regulations (e.g., GDPR) and ethical standards for working with children.
- Only data necessary for providing services to children is collected.
- Children (depending on age) and their parents/guardians are informed about what data is being collected, why, and how it will be used.
- Written consent from parents/guardians is required for the collection of sensitive data.
- Digital data is stored on computers and secured servers protected by passwords.
- Access to data is restricted to authorized personnel within the organization, according to their roles (e.g., Executive Board, coordinators).
- Data is used exclusively for the purpose of delivering services to the child.
- Sharing data with third parties (e.g., schools, social welfare centers) is only allowed with written parental consent, except in cases required by law (e.g., reporting abuse).
- Photos and video materials are used only with prior written parental consent and for clearly defined purposes (e.g., reports, promotional materials).
- Data is retained only as long as necessary, depending on the nature of the program (as defined in funding agreements and/or legal requirements).
- Any suspicion of data misuse must be reported immediately to the organization's president or program manager. If necessary, relevant authorities and affected individuals (parents, children) will be notified.
- All employees and volunteers sign a Confidentiality Agreement before beginning their work with the organization.

Monitoring and evaluation





Coordinators are responsible for monitoring the implementation of the Child Protection Policy in individual programs and projects.



In case of violation of this Policy, the coordinators are obliged to inform the President of the Association.



The evaluation of the Policy is carried out once every two years, and includes feedback from employees, associates and volunteers.



The implementation of this Policy is monitored and supervised by the Management Board.

COMPLAINTS PROCEDURE REGARDING CHILD PROTECTION

The organization fosters a culture where it is safe and acceptable to raise concerns and ensures a simple and secure way to submit complaints in situations where someone notices inappropriate behavior toward children, violations of children's rights, or any actions that are not in accordance with the child protection policy.

A complaint may be submitted by anyone – a child, parent, employee, volunteer, or external collaborator – if they have a concern or suspicion about the behavior of anyone within the organization.

Complaints can be submitted to the President of the organization:

- Verbally
- In writing by post: Hrelićka 18a, Zagreb
- By email: info@hrabritelefon.hr

It is important to know that all complaints are taken seriously, documented, and handled confidentially. If the complaint is found to be valid, the organization will take appropriate measures to protect the child and prevent any recurrence of unacceptable behavior.

Annexes



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HRELIČKA 18A, 10 000 ZAGREB, HRVATSKA

TEL: (+385) 1 3793 000 EMAIL: INFO@HRABRITELEFON.HR

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BRAVE PHONE CODE OF CONDUCT FOR EMPLOYEES, ASSOCIATES AND VOLUNTEERS

In its work, the Brave Phone promotes and strengthens its obligation to protect children and adults from all forms of abuse and exploitation. This Code of Conduct defines the ways in which employees, associates and volunteers are obliged to treat children and adults in all programs and projects of Brave Phone and each other.

By accepting the Code, I undertake to:

- that in my work I will be guided by the humanistic, moral and ethical values of the profession as well as the laws, protocols and other binding documents of the Republic of Croatia for the purpose of protecting human rights and protection against abuse, neglect and exploitation, with a special emphasis on sexual abuse and exploitation
- that I will regularly participate in additional training and supervision
- that I will treat all children equally, regardless of sex, color, race, language, religion, political or other belief, national or social origin, property, birth or any other circumstance
- that I will encourage children's participation in decision-making
- that I will promote positive behaviors and non-violent communication by my example and responsible behavior
- that I will teach children how to protect themselves from violence
- that I will take care of the anonymity and confidentiality of all data about children, parents and other involved users

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-
- that, if there is a suspicion or knowledge that a child is at risk, i.e. exposed to any form of abuse or neglect by peers or an adult, I will conduct a conversation with the child in an appropriate manner and inform the program coordinator about the findings, i.e. that I will respect written protocols and guidelines of specific programs and projects of the Brave Phone.
 - that, if there is any doubt or knowledge that a volunteer/associate or employee is exposed to any form of abuse or neglect with an emphasis on sexual abuse, I will inform the competent persons of the Association, i.e. that I will comply with the laws, protocols and other binding documents of the Republic of Croatia

If, during the course of their work, it is determined that an employee, collaborator, or volunteer does not adhere to this Code of Conduct, Brave Phone reserves the right, depending on the situation, to terminate the contract and, if necessary, initiate disciplinary or legal actions.



As an employee/associate/intern/volunteer of the Brave Phone association, I give the following

CONFIDENTIALITY STATEMENT

I am aware that the data and information I learn while performing activities on Brave Phone programs are confidential and that I may use them exclusively for activities within the framework of the agreed cooperation and with the consent of the responsible persons in the Brave Phone association.

With this statement, I undertake to:

- not share the information I have learned about the users of the program or make it available to third parties in any other way, except in situations where I am legally obliged to do so,
- take all security measures to protect data confidentiality,
- not misuse information about people close to me or people I know or in any way let it be known that I am familiar with them.

If I am in any way responsible for the disclosure of data (intentionally or through negligence), I undertake to compensate the resulting damage in agreement with the Brave Phone association and the user(s).

This Statement is given solely for the purpose of protecting users/employees/associates/interns/volunteers of Brave Phone from unauthorized disposal of confidential data and cannot be used for other purposes.

I have read and fully understand the Confidentiality Statement and I declare that I will comply with it.

Zagreb, date

Name and surname: _____

Signature: _____



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PHOTOGRAPHY AND RECORDING CONSENT

I, _____ (parent's name and surname)

GIVE/DON'T GIVE my consent (circle)

that my child _____ (child's name and surname) participates in
photography and recording for the needs of the Brave Phone* association.

* Photos and recordings will be used exclusively for:

- presenting work to parents (through monthly newsletters)
- professional training (volunteer and expert training)
- presentation of work to donors
- presenting and promoting the work of the Brave Phone association (web and Facebook page, brochures and leaflets of the association).

Further on, I **GIVE/DON'T GIVE** my consent (circle)

that my child participates in photography and filming for print and electronic media (press, television, radio and internet portals).

Brave Phone undertakes to use the mentioned materials for the purpose of sensitizing the public for the protection of children and young people and to take care of preserving the dignity of children.

In Zagreb, _____

Parent's signature