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InnovHub



Transforming Potential into Action



Empowering Social Advancement through Innovation

CHILD PROTECTION & SAFEGUARDING POLICY

Kingdom of the Netherlands | 2025



This policy is grounded in Dutch and European law, including:

- UN Convention on the Rights of the Child (1989), ratified by the Netherlands in 1995
- EU Charter of Fundamental Rights, Articles 21 & 24
- Burgerlijk Wetboek (Dutch Civil Code), Book 1 — parental authority and child protection
- Wet verplichte meldcode huiselijk geweld en kindermishandeling (Mandatory Reporting Code Act, in force since 2013, revised 2019)
- Jeugdwet (Youth Act 2015) and the Wet kwaliteit, klachten en geschillen zorg (Wkkgz)
- Wet justitiële en strafvorderlijke gegevens — Verklaring Omtrent het Gedrag (VOG) screening via Justis
- Algemene Verordening Gegevensbescherming (AVG/GDPR) and the Uitvoeringswet AVG (UAVG)
- Council of Europe Lanzarote Convention

1. Statement of Commitment

Van Mooiste, operating under the trading name **InnovHub** (“the Organisation”, “InnovHub”), is fully committed to safeguarding and promoting the welfare of every child and young person who engages with its activities, workshops, and partnerships — whether in the Netherlands, in partner countries, or online. This commitment extends in particular to the younger participants among InnovHub's target groups, including NEETs and young people in non-formal education, entrepreneurship, and STEAM activities who may be under the age of 18.

InnovHub adopts a **zero-tolerance approach** to any form of abuse, neglect, exploitation, or discrimination against a child, and commits to treating every child with dignity, respect, and care in every workshop, training, and community activity it runs or takes part in.

This policy applies in addition to, and does not replace, any child protection policy adopted by a partner organisation within a joint project; where InnovHub leads an activity involving minors, this policy sets the minimum standard.

2. Legal and Regulatory Framework

This policy is drafted to comply with the child protection legal framework applicable in the Kingdom of the Netherlands, as well as relevant European and international instruments:

International and European instruments

- United Nations Convention on the Rights of the Child (UNCRC, 1989), ratified by the Netherlands in 1995 — establishing the child's right to protection, participation, and provision.
- EU Charter of Fundamental Rights, Articles 21 (non-discrimination) and 24 (the rights of the child).
- EU Strategy on the Rights of the Child (2021–2024).
- Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention, 2007), ratified by the Netherlands in 2010.
- Regulation (EU) 2016/679 (GDPR) and its Dutch implementing act, the *Uitvoeringswet Algemene Verordening Gegevensbescherming* (UAVG).

Dutch national legislation

- **Burgerlijk Wetboek Boek 1** (Dutch Civil Code, Book 1) — parental authority, guardianship, and the legal protection of minors.
- **Wet verplichte meldcode huiselijk geweld en kindermishandeling** (Mandatory Reporting Code for Domestic Violence and Child Abuse Act, in force since 2013 and strengthened on 1 January 2019 with the introduction of the “afwegingskader” / decision-making framework). This Act requires organisations working with children to adopt and use a five-step “meldcode” (reporting code) when abuse, neglect, or domestic violence is suspected.
- **Jeugdwet** (Youth Act 2015) and the **Wet kwaliteit, klachten en geschillen zorg (Wkkgz)**, which govern youth care quality, complaints, and mandatory reporting duties for care and youth-facing organisations.

- **Wet justitiële en strafvorderlijke gegevens** — the legal basis for the **Verklaring Omtrent het Gedrag (VOG)**, the certificate of good conduct issued by Justis (Ministry of Justice and Security), required for staff and volunteers with regular contact with minors.
- **Wetboek van Strafrecht** (Dutch Criminal Code), Articles 240b–250 — criminalising child sexual abuse material, grooming (Art. 248e), and sexual abuse and exploitation of minors.
- **Kinderopvangwet** and related sector regulation, applied by analogy where InnovHub activities resemble supervised childcare or educational settings.

In matters of child protection, InnovHub follows the inter-institutional referral procedures of Veilig Thuis (the national Advice and Reporting Centre for Domestic Violence and Child Abuse) and, where applicable, the Raad voor de Kinderbescherming (Child Care and Protection Board).

3. Scope

This policy applies to:

- All InnovHub staff and management;
- Volunteers, freelancers, trainers, and interns engaged by InnovHub;
- Partner organisations, sub-grantees, and associates delivering activities on InnovHub's behalf;
- Any individual representing InnovHub in an activity involving persons under the age of 18 (“children”), whether in the Netherlands, abroad, or online.

A “child” is any person under the age of 18, in line with the UNCRC and Dutch law (Article 1:233 Burgerlijk Wetboek).

4. Key Principles

- The best interests of the child are the primary consideration in every decision (UNCRC Art. 3; EU Charter Art. 24).
- Non-discrimination and inclusion: every child is treated equally regardless of origin, gender, religion, disability, or any other status.
- Participation and voice: children are given age-appropriate information and their views are heard and given due weight.
- Proportionality and confidentiality in the handling of personal data, in line with the AVG/GDPR and UAVG.
- Accountability: clear roles, mandatory training, prevention, and safe, structured reporting.
- Prevention is prioritised over reaction, but every suspicion is treated with urgency and care.

5. Definitions

Abuse and neglect

Physical abuse: actual or potential physical harm from hitting, shaking, burning, scalding, poisoning, or suffocation, including fabricated or induced illness.

Sexual abuse and exploitation: forcing or inciting a child to take part in sexual activities, with or without physical contact, including online grooming (a criminal offence under Article 248e of the Wetboek van Strafrecht), image-based abuse, and involving a child in the production or viewing of sexual material.

Emotional/psychological abuse: persistent emotional maltreatment causing severe and lasting effects on a child's emotional development, including humiliation, threats, isolation, or exposure to serious bullying (including cyberbullying).

Neglect: the persistent failure to meet a child's basic physical or psychological needs — food, clothing, shelter, supervision, safety, medical care, or affection — likely to result in serious harm to health or development.

Exploitation: using a child for labour, financial gain, or other benefit to the detriment of their physical, mental, moral, or social development, including child labour and trafficking.

Other key terms

Safeguarding: all actions taken to prevent harm and to respond appropriately when harm occurs or is suspected, including online safety and safe recruitment.

Meldcode (Reporting Code): the mandatory five-step decision-making protocol under Dutch law that guides a professional from initial signal to the decision on whether to report to Veilig Thuis.

6. Roles and Responsibilities

Founder & Director (Accountable Officer)

The Founder & Director of InnovHub approves this policy, allocates the resources necessary for its implementation, ensures resources are available for safeguarding matters, escalates matters to external authorities where the Designated Safeguarding Officer is implicated, and receives an annual safeguarding report.

Designated Safeguarding Officer (DSO)

InnovHub appoints a Designated Safeguarding Officer responsible for day-to-day compliance, acting as the first point of contact for staff, volunteers and external experts, maintaining the confidential incident register, and coordinating referrals to Veilig Thuis, the police, or the Raad voor de Kinderbescherming. A Deputy DSO is appointed to act in the DSO's absence.

All staff, volunteers, and partners

Every person covered by the scope of this policy has a personal duty to prevent harm, to recognise the signs of abuse and neglect, and to report any concern promptly in accordance with Section 8 below. Partner organisations and sub-grantees must either adopt this policy or demonstrate an equivalent standard before collaboration begins.

7. Code of Conduct

All adults working with or in contact with children on behalf of InnovHub must:

- Treat every child with dignity and respect, without discrimination of any kind;
- Apply the “two-adult rule” wherever feasible, and keep meetings with children observable and interruptible;
- Never use sexualised language or behaviour, and never exchange gifts or favours that could create dependency or obligation;
- Communicate with minors only through professional, approved channels — never through private messaging or unsupervised personal contact;
- Never photograph or film a child without prior written parental/guardian consent and the child's own assent, and never publish identifying information without explicit permission;
- For online activities: use waiting rooms, disable private messaging (DMs) between adults and children, and ensure moderators are safeguarding-trained;
- Never administer physical punishment, or threaten to do so — this is strictly prohibited.

Under Dutch law, an adult who holds a position of trust, authority, or influence over a young person and engages in sexual conduct with that young person commits a criminal offence, **even where the young person is 16 or older and the contact is ostensibly consensual** (Wetboek van Strafrecht, Art. 249).

8. Safe Recruitment, Vetting and Training

- **VOG (Verklaring Omtrent het Gedrag):** a certificate of good conduct issued by Justis is required, before the start of work, for all staff and volunteers who will have regular, unsupervised contact with children.
- Structured interviews and reference checks are conducted for all roles with child contact;
- Every new employee, volunteer, and trainer completes a safeguarding induction, covering this policy, the Code of Conduct, and the reporting procedure, before starting any child-facing activity;
- All staff and volunteers receive an annual safeguarding refresher, including how to recognise signs of abuse and how to use the internal reporting form;
- The Designated Safeguarding Officer and Deputy receive advanced annual training on handling disclosures, referral decision-making, and online harms.

9. Risk Assessment and Safe Programming

A documented risk assessment is completed before every activity involving children, covering venue safety, staff-to-child ratios, transport, online tools, and referral pathways.

- Appropriate adult-to-child ratios and the two-adult rule apply to all off-site and overnight activities;
- Parental/guardian permission, medical information, and emergency contacts are collected before travel or overnight stays;
- Online platforms used with children are vetted, privacy-by-default settings are applied, and sessions are moderated;
- Activities are designed to be gender-responsive, disability-inclusive, and culturally appropriate, with reasonable adjustments documented in the risk assessment.

10. Reporting and Response Procedure

InnovHub follows the five-step “meldcode” (reporting code) required under Dutch law:

- Step 1 — Map the signals: record what has been observed, factually and without interpretation;
- Step 2 — Consult a knowledgeable colleague or the Designated Safeguarding Officer, and where appropriate Veilig Thuis, to interpret the signals;
- Step 3 — Talk with the child and, where safe to do so, with the parents/guardians;
- Step 4 — Weigh the nature and severity of the situation;
- Step 5 — Decide: is a report to Veilig Thuis necessary, and can appropriate support be organised or arranged?

Any concern, however small, must be reported immediately to the Designated Safeguarding Officer (or Deputy, or the Chairperson if the DSO is implicated) and recorded on the internal Concern/Incident Form within 24 hours.

Where a child is in immediate danger or at risk of significant harm, the matter must be referred without delay to Veilig Thuis and/or the police — do not wait to complete the internal form first.

- Do not investigate, question, or confront the alleged perpetrator;
- Do not promise confidentiality to a child who discloses abuse — explain that the information must be shared with those who need to know to help them;
- Listen calmly, reassure the child, and avoid leading questions;
- Preserve any evidence and record the conversation as soon as possible, using the child's own words;
- Maintain confidentiality on a strict “need to know” basis throughout.

Under the Wet verplichte meldcode, using the reporting code is mandatory for organisations and professionals, but it is not in itself a duty to report (geen meldplicht) — professionals retain a right to report to Veilig Thuis even without the family's consent, once the five steps have been followed and the decision-making framework applied.

11. Contacts and Referral Authorities

Where a child is in immediate danger, call emergency services immediately.

Role / Body	Details
Emergency services (police, ambulance, fire)	112
Police, non-urgent	0900–8844
Veilig Thuis — national Advice and Reporting Centre for Domestic Violence and Child Abuse (available 24/7, free of charge)	0800–2000 • www.veiligthuis.nl
De Kindertelefoon — free, confidential helpline for children and young people	0800–0432 • www.kindertelefoon.nl
Raad voor de Kinderbescherming (Child Care and Protection Board)	www.kinderbescherming.nl
Justis — VOG (Verklaring Omtrent het Gedrag) certificate of good conduct	www.justis.nl
Autoriteit Persoonsgegevens — Dutch Data Protection Authority	www.autoriteitpersoonsgegevens.nl

Internal contacts

Role / Body	Details
Founder & Director, InnovHub	Ahmet Kocatürk
Project Coordinator	Arsoy Ar

12. Data Protection and Privacy (AVG/GDPR)

- Lawful basis for processing children's data is consent or legitimate interest; explicit parental/guardian consent, together with the child's own assent, is obtained for images and recordings;
- Data minimisation: only necessary information is collected; incident records are pseudonymised where possible;
- Retention: safeguarding records are retained only as long as required by statutory obligations, and are stored securely with access limited to those who need it;

- Cross-border transfers of children's data (relevant given InnovHub's international partnerships) take place only with appropriate safeguards under the AVG/GDPR;
- Data subject rights, including those of children and their guardians, are respected in accordance with the Uitvoeringswet AVG.

13. Concerns About an Adult's Conduct

Any suspicion, however minor, about the conduct of an adult working with or in contact with children must be reported immediately to the DSO or, if the DSO is implicated, to the Chairperson.

- Low-level concerns are discussed promptly and confidentially, and a record is kept centrally to identify patterns over time;
- Higher-level allegations — where an adult is suspected of having harmed a child, committed an offence against a child, or behaved in a way that creates a risk of harm — are escalated to the Chairperson and referred to the police and/or Veilig Thuis within 24 hours;
- The person who is the subject of an allegation is not informed in advance of a referral where this could jeopardise a child's safety or a police investigation;
- Suspension of an implicated staff member or volunteer is considered, as a precautionary and non-disciplinary measure, only where necessary to protect a child, and always in consultation with the Founder & Director;
- No person who raises a concern in good faith will face retaliation; allegations found to be false or malicious are removed from personnel records.

14. Whistleblowing

All adults have a responsibility to report suspected poor or unsafe practice, including practices that fall short of this policy but do not amount to abuse. Staff who feel unable to raise a concern with the Chairperson may report it directly to Veilig Thuis or the police. No staff member or volunteer will be subject to retaliation for a good-faith report made under this section.

15. Monitoring and Review

This policy is reviewed annually by the Founder & Director of InnovHub, and updated without delay whenever Dutch or EU legislation changes, or whenever a safeguarding incident reveals a gap in current practice. It is published to all staff, external experts, and partners, and shared with project partners as the minimum common standard for any activity involving children.

Declaration of Commitment

Van Mooiste, trading as InnovHub, commits to creating and maintaining a safe environment in which the rights, safety, and dignity of every child are respected and protected.