

CHILD PROTECTION POLICY OF HALO FOUNDATION

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Introduction

This document outlines the minimum general standards for child protection that the HALO Foundation introduces through the relevant procedures and mechanisms in its activities.

The policy is approved and signed by the Foundation’s Board of Directors and is in accordance with the rights of the child as set out in the UN Convention, European, and Bulgarian legislation. It applies to all members of the Board of Directors, as well as to all employees and volunteers of the Foundation, who agree to comply with the Child Protection Policy by signing a special declaration (Appendix 2a).

The establishment of an internal organizational Child Protection Policy supports the understanding and principles of the HALO Foundation as an organization, and of each

of its employees in a personal capacity, that all forms of risk to children (such as abuse, violence, bullying, and child exploitation, etc.) are unacceptable.

The main purpose of the policy is to ensure the safety of children who come into contact with representatives of the organization in various situations during the implementation of program activities, projects, and interactions, while complying with the recommendations and provisions of Bulgarian and international legislation in the field of child rights protection. The policy contains a set of standards that define the main organizational principles, procedures, rules of conduct, communication, and interactions with partners, ensuring that we make efforts not to allow conditions that may pose a risk to children in our work, and that we respond lawfully when a risk situation for children is identified.

The policy also aims to prevent and provide instructions for action in cases that may lead to violations of children's rights. It includes additional resources and annexes that support the work of the HALO Foundation team in preventing and reporting identified cases of risk to children.

The policy is coordinated with the organization's expert and managing boards. Its updating and revision is carried out on a three-year basis or promptly in specific cases that require a timely response. Some of the measures set out in the Policy may be further developed in view of the organization's work cycle.

Principles of the Child Protection Policy

The Child Protection Policy of the HALO Foundation is based on the UN Convention on the Rights of the Child, the UN Declaration on the Elimination of Sexual Abuse and Exploitation of Children, and all other UN conventions related to children, as well as:

- Child Protection Act
- Domestic Violence Protection Act
- Convention on the Rights of the Child
- Combating Trafficking in Human Beings Act
- Mechanism for Counteracting Bullying and Violence in Institutions within the Preschool and School Education System and other national and international good practices.

The principles underlying the Child Protection Policy of the HALO Foundation are:

- All children have equal rights to protection.
- In our work, we prioritize the health, safety, and life, as well as the psychological and emotional well-being of children.
- The actions we take at all times are guided by the best interests of the child in relation to their protection and the respect of their rights.
- Every member of the HALO Foundation team, including interns and volunteers (who have direct contact with children or information about children during activities or projects carried out by the HALO Foundation), has the responsibility to support safe conditions for the children with whom they work or interact in the performance of their duties and responsibilities.
- The HALO Foundation supports and encourages its partners to take responsibility for complying with the minimum requirements for ensuring the safety of children with whom they have direct contact during activities or projects implemented by the HALO Foundation.

Strategy for Implementing the Child Protection Policy (hereinafter referred to as “the Policy”):

- **Awareness**
To ensure the effective implementation of the Policy, actions are undertaken for its proper understanding and compliance. The main actions envisaged in this regard include presentations and trainings for members of the HALO Foundation and all interested interns, partners, and supporters of the organization, as well as members of the Board of Directors, in cases of contact with children within activities and projects carried out by the HALO Foundation.
- **Prevention**
For the prevention of risks to children, the creation of a resource bank is planned. It will include relevant manuals, materials, and contact information of governmental and non-governmental organizations with expertise and involvement in working with children at risk. This resource will be available to employees and other stakeholders engaged in the implementation of the Policy.

- **Reporting**

The Policy describes specific steps for reporting when identifying risks to children and/or cases of creating risks for children by employees or other individuals in contractual relations with the HALO Foundation within activities or projects directly organized by the HALO Foundation.

- **Consequences of Non-Compliance with the Policy and Disciplinary Responsibility**

Violation of the Policy by employees of the HALO Foundation may lead to disciplinary actions: reprimand, notice of dismissal, or dismissal. Violation of the Policy by supporters of the HALO Foundation will be reported to the Manager and, depending on the case, may result in termination of partnership relations and joint activities.

- **Monitoring**

To ensure compliance with the Policy, the responsible persons are described below [Appendix 1].

Definitions and Terms

Definition of “child” according to the adopted Child Protection Act, Art. 2:

“A child means every human being below the age of eighteen years.”

Definition of “risk to a child/children” and “child/children at risk”:

A child at risk is a child who:

- has suffered and/or witnessed any form of violence and/or exploitation (defined below);
- has experienced restrictions of rights on the basis of race, nationality, ethnicity, gender, origin, financial status, religion, education, beliefs, or disability;
- has been involved in activities harmful to their physical, mental, moral, and educational development;
- has been subjected to methods of upbringing that violate dignity, or to physical, psychological, or other forms of violence and influence contrary to their interests;

- has engaged in or has been involved in begging, prostitution, distribution of pornographic materials, or unlawful financial gain, as well as in cases of sexual violence;
 - has been involved in political, religious, or trade union activities;
 - has been involved in human trafficking;
 - has been involved in committing violations of the law;
 - has had their personal protection rights (as described in the Child Protection Act, Art. 11a) violated;
 - has been a victim of crime or is in immediate danger to life or health (for example, lost, helpless, or left without supervision, including abandonment);
 - and all other described cases of violations of children's rights under the Child Protection Act.
- Additionally, a "child at risk," subject to specialized measures of protection and support, is a child:
- a) whose parents are deceased, unknown, deprived of parental rights, or whose parental rights are restricted, or has been left without parental care;
 - b) who is a victim of abuse, violence, exploitation, or any other inhumane or degrading treatment or punishment, within or outside the family;
 - c) who faces a risk of impairment to physical, mental, moral, intellectual, or social development;
 - d) who suffers from disabilities or severe illnesses diagnosed by a specialist;
 - e) who is at risk of dropping out of school or has already dropped out of school.
- (Child Protection Act, Additional Provisions)
- Definitions of "violence," "physical violence," "psychological violence," "sexual violence," and "neglect" according to section "Additional Provisions" (§1, item 1) of the Regulation on the Implementation of the Child Protection Act (§1, items 2, 3, 4, and 5):
1. "Violence" against a child means any act of physical, psychological, or sexual violence, neglect, commercial or other exploitation, leading to actual or potential

harm to the health, life, development, or dignity of the child, which may occur in family, school, or social environments.

2. “Physical violence” means inflicting bodily harm, including causing pain or suffering without actual health impairment.
 3. “Psychological violence” means all actions that may harm the child’s mental health and development, such as belittlement, mocking, threats, discrimination, rejection, or other negative treatment, as well as the inability of a parent, guardian, custodian, or caregiver to provide an appropriate supportive environment.
 4. “Sexual violence” means using a child for sexual gratification. The term “indecent assault” in the law refers to lewd acts aimed at arousing or satisfying sexual desire without intercourse. It is also a crime to provide online or otherwise information about a person under 18 in order to establish contact for indecent assault, sexual intercourse, prostitution, or creation of pornographic material, as well as to use such information about a person under 14 for the same purposes (Criminal Code, Art. 155a).
 5. “Neglect” means the failure of a parent, guardian, custodian, or caregiver to ensure the child’s development in one or more of the following areas: health, education, emotional development, nutrition, housing, and safety, when able to do so.
 6. “Abandonment” means the permanent refusal of a parent, guardian, or custodian to care for a child.
- Definition of “domestic violence” according to the Domestic Violence Protection Act (DVPA), Art. 2 (amended, SG No. 102/2009, effective 22.12.2009):
- (1) “Domestic violence” is any act of physical, sexual, psychological, emotional, or economic violence, as well as attempted such violence, forced restriction of privacy, personal freedom, and personal rights, committed against persons who are related, who are or were in a family relationship, or in de facto cohabitation.
 - (2) Psychological and emotional violence against a child also includes any domestic violence committed in their presence.
- Definition of “human trafficking” according to the Criminal Code of the Republic of Bulgaria, Art. 159a, para. 1:
- “Whoever recruits, transports, hides, or receives individuals or groups of people

for the purpose of sexual exploitation, forced labor, organ removal, or forced subjugation, regardless of their consent.”

➤ “Early marriage”:

Children at risk also include persons under 16 years of age who are forced, under parental authority, to live in marital cohabitation with another (Criminal Code, Art. 190). A risk to a child also exists when a person under 16 lives in marital cohabitation with someone. It is a crime when a parent, relative, or guardian allows, in exchange for payment/dowry, their daughter or female relative to enter into marriage, or when a person participates in such a transaction (Criminal Code, Art. 178).

A risk to a child also exists when:

- a person under 18 is employed without the proper authorization (Criminal Code, Art. 192a);
- a child is induced to beg and/or used for begging, including by their parent or guardian (Criminal Code, Art. 189).

Scope

The Child Protection Policy of the HALO Foundation applies to all employees of the organization, all participants in the programs of the HALO Foundation, and, in cases of contact with children within the framework of activities or projects of the HALO Foundation, also to members of the Board of Directors and Supervisory Board of the Foundation, interns, as well as members of partner organizations with which we cooperate.

By *employees* we mean all individuals working in the organization:

- under employment contracts;
- under civil contracts, whose work involves direct contact with children and/or with information about children;
- interns and volunteers in the organization who have direct contact with children and/or with information about children.

By *partners* we mean all partner organizations—institutions, NGOs, corporate entities, donors—with which the Foundation works in carrying out its mission; international partners and other international organizations; guests and visitors, media representatives, and their affiliates who have direct contact with children within the framework of activities or projects implemented by the HALO Foundation.

Prevention

Actions in cases of identified risks to children are both an organizational and a personal responsibility of every employee in the organization and participants in the programs and projects of the HALO Foundation.

To ensure that no risks to children are created, the HALO Foundation follows these steps and actions:

1. Risk Assessment / Mitigation

The HALO Foundation takes into account the Policy and its principles when preparing relevant new elements and structures in its work, new projects, and activities involving or relating to children.

2. Recruitment of Staff/Volunteers/Interns

The recruitment of staff, including employees, program and project participants, and interns, is a key element in carrying out the mission and activities of the organization. The following practices aim to eliminate risks to children:

- Hiring of employees

All employees are hired under clear conditions regarding qualifications, professional experience, and job descriptions. The recruitment process must be consistent with the principles set out in the Policy (e.g., attitudes toward communities, responses to injustice) in cases where employees will work directly with children. At the discretion of the line manager, the recruitment procedure may include an assessment of the candidate's likelihood to create or neglect risks to children, as well as previous involvement in child-risk situations (e.g., through oral or written references from people who have worked directly with the candidate).

All employees are introduced to the Child Protection Policy upon starting work in the organization, signing a declaration to confirm this [see Appendix 2a]. When the Policy is revised or updated, they are notified of the changes.

The line manager monitors each employee's development, takes actions, and reports to the Policy Officer when concerns about risks to children arise,

consistent with the Policy.

- Work/selection of other related parties

Related parties include interns, partners, NGOs, individuals, donors, board members, and supporters.

These organizations and individuals usually do not engage in regular direct work with children within cooperation with the Foundation, except when this is part of their main activity, in which case it is governed by their internal mechanisms.

When related parties have occasional contact with children in connection with cooperation with the Foundation, the organization ensures they are familiar with the Policy and sign a declaration [Appendix 2b]. It is recommended that they be accompanied by a Foundation staff member or program participant during classroom visits and child interactions.

For interns/volunteers, the line manager may request references from previous employers or other individuals with direct observations (mentor, teacher, etc.) regarding work with children.

For all other related parties, references may also be requested at the discretion of the line manager or team member to ensure compliance with child safety.

3. Code of Conduct

The organizational values of the HALO Foundation are included in the contracts of all employees and participants. They are referenced in decision-making, both in daily activities and in key organizational decisions. These values are also the focus of group internal meetings related to staff and member activities. The values incorporate the main principles of the Policy, which all employees are required to follow.

4. Child Risk Trainings

All employees of the HALO Foundation (and, when necessary, interns, board members, and partners with direct contact with children or access to child-related information in projects and activities led by the Foundation) must be familiar with the Child Protection Policy. They receive a copy of the Policy and sign a declaration confirming that they have received, read, and understood it [see Appendix 2a, b]. The declaration includes full name, signature, date, and city.

The declaration is stored for up to 5 years from the date of signing with restricted access (accessible only to Policy Officers and the employee/participant). The information is used solely to prove awareness of the Policy.

The Policy Officer creates and maintains a resource bank to support the identification of child risks, including contacts with relevant external experts and institutions. This

resource bank is regularly shared and updated during Policy revisions or as needed.

The Policy and resource bank are presented to every new team member during introductory meetings/trainings. The Policy Officer may also propose and organize additional trainings as needs arise.

5. Communications

In its internal and external communications, the HALO Foundation commits to respecting children's rights, ensuring that the dignity of children, families, and communities it works with is not compromised.

When using real stories or visual materials involving children, the Foundation commits to following rules and procedures to protect children and comply with legal requirements under the UN Convention on the Rights of the Child, the Constitution of the Republic of Bulgaria (Art. 32), the Child Protection Act, and the Personal Data Protection Act.

When photographing children for external communication, a prior signed declaration from a parent/guardian/custodian is mandatory, granting permission for the use of the images for the specified purposes [see Appendices 4, 5]. The declaration includes the full names of the parent/guardian/custodian (if the child is under 14) and the child, the parent/guardian/custodian's signature, date, and city. It is stored for up to 1 year with restricted access (accessible to Policy Officers, the parent/guardian/custodian, and the child if 14+). The information is used only to prove that consent was given.

Filming and photography of children comply with the personal rights provisions under the Child Protection Act, Art. 11a:

1. Information about a child may not be disclosed without parental or legal guardian consent, except in cases under Art. 7(1).
2. When a child is under protective measures, no information may be disclosed without written permission from the child protection authority that imposed the measure.
3. When a child is 14 years or older, their consent must also be obtained.

Photos/videos used must be decent, respectful, and must not portray children as victims. Children should be appropriately dressed, and poses that may be interpreted as sexually suggestive must be avoided.

The Foundation acknowledges that in the nature of its work, children may sometimes be victims (e.g., of poverty). In such cases, the child's dignity must be preserved while presenting reality in an appropriate way.

When sharing real stories involving children, if there is a risk of violating children's rights or dignity, names and identifying information will be changed to

ensure safety.

On the HALO Foundation's social media channels, procedures are applied to prevent user posts or comments that create risks to children.

6. Responsibility

The Policy is approved by the Board of Directors of the HALO Foundation. The Policy Officer is the main point of contact for any questions regarding the Policy. They are listed in Appendix 1.

7. Partnerships

In partnerships with other organizations or individuals that involve contact with children in activities or projects implemented by the HALO Foundation, the Foundation informs and requires the counterpart to comply with the Policy.

Mechanism for Reporting

With this Policy, the HALO Foundation regulates the existence of a safe and reliable mechanism for reporting cases of risk or suspicions thereof in protecting the rights of children within its activities [see Appendix 3].

The purpose of the mechanism is to ensure that information about a potential risk to a child reaches a person or organization capable of responding adequately and in line with the best interests of the child.

Every such report is received and reviewed seriously and responsibly, while observing the principle of confidentiality. The priority is always the safety and best interest of the child.

Internal and external levels of reporting are defined and applied depending on the degree of the risk. All individuals (employees, program participants of HALO, interns, visitors, partner representatives) connected to the work of HALO bear a personal responsibility to inform and report any suspicions, concerns, or evidence of risk or risk situations involving children and youth, if identified during their work with children in activities or projects directly organized and implemented by the organization.

Each report of a child at risk is submitted in writing via email or verbally to the immediate manager/team leader or directly to the Policy Officer.

To support an objective and impartial investigation, the manager may form an internal investigation committee to review the report, conduct checks, take next steps, and decide on specific actions (e.g., notifying internal structures such as a committee within

the organization, the management team, or external structures such as parents, schools, social services, police, etc.).

Reports of child risk must also be communicated promptly to the HALO Policy Officer, either by email or verbally. The Policy Officer supports the committee and the line manager in examining specific cases and may independently form a committee if necessary.

When reports involve an employee, intern, or another related party who has had direct contact with children during activities or projects organized by HALO, a timely investigation is launched with the involvement of the employee's line manager and/or other key individuals under whose supervision the program participant was placed. If the report concerns a criminal act against a child/children, it will be reported to the authorities before any action is taken or before the alleged perpetrator is informed, to ensure that the internal investigation does not compromise legal proceedings.

Internal investigations are led by the relevant team manager or the Policy Officer, if required. The clarification of the case includes interviews with all parties, including witnesses, to collect all details related to the report, gathering and reviewing explanations, and considering objective information relevant to the case.

If the investigation confirms a violation of the principles and values described in the Policy, steps will be taken to remove the person(s) from the program/organization and their position, following the relevant administrative procedures. If the case corresponds to actions against children subject to legal penalties under Bulgarian law, the information will be shared with the competent state authorities.

All reports and information related to child risk are documented and stored confidentially by the Policy Officer.

The register is kept in online format in a secure location, with access restricted solely to the Policy Officer. The confidentiality of all individuals involved will be respected. Confidentiality will be breached only if it is in the best interests of the child and in accordance with Bulgarian legislation. The register of information and cases will also serve to improve the current Policy and to introduce additional practices and mechanisms, as identified by the Policy Officer and the team.

Monitoring and Updating

For the purpose of monitoring and tracking the Policy, the Policy Officer in the organization is responsible for:

1. Ensuring that all team members sign to confirm their awareness of the Policy upon taking up a position or following a revision of the Policy.
2. Ensuring that partners and other individuals, whether or not in direct contractual relations with the HALO Foundation, sign to confirm their awareness of the Policy when they have direct contact with children or access to information about children during activities or projects directly managed by HALO.
3. Ensuring that clearly stated and accessible steps (mechanism) for response are in place, along with shared contact details of the Policy Officer in the organization.
4. Ensuring the availability of an accessible resource bank to support the implementation of the steps described in the Policy.
5. Informing and supporting relevant teams when revisions of specific activities and documents are needed in order to address situations involving children at risk.

The Policy is reviewed and revised periodically, or when a need is identified by the Policy Officer of the organization. Changes are approved by the Board of Directors.

Annexes

Annex 1: Responsible for the implementation of the Child Protection Policy are Svetlin Yordanov and Andriana Musabasheva.



Annex 2a: Declaration of Familiarity with the Policy

DECLARATION

Regarding familiarity with the Child Protection Policy of the HALO Foundation

.....,

/First Name, Middle Name, Last Name/

Employee at the HALO Foundation in the position of

I hereby declare that I am familiar with the Child Protection Policy of the HALO Foundation and agree to comply with the requirements, guidelines, and principles described in the Policy.

Declarant:

/Name, Signature/

Date:

The declaration includes the full name of the employee, signature, date, and city. The declaration is stored for up to 5 years from the date of signing with restricted access (accessible only to the Policy Officers and the employee). The information provided in the declaration will be used solely for the purposes of this Policy to verify that the employee is aware of the Policy and agrees to comply with its requirements.



Annex 2b: Declaration of Familiarity with the Policy

DECLARATION

Regarding familiarity with the Child Protection Policy of the HALO Foundation

.....
/First Name, Middle Name, Last Name/

Participant in a project and/or activity of the HALO Foundation

I hereby declare that I am familiar with the Child Protection Policy of the HALO Foundation and agree to comply with the requirements, guidelines, and principles described in the Policy.

Declarant:
/Name, Signature/

Date:

The declaration includes the full name of the person, signature, date, and city. The declaration is stored for up to 1 year from the date of signing with restricted access (accessible only to the Policy Officers and the person).

The information provided in the declaration will be used solely for the purposes of this Policy to verify that the person is familiar with the Policy and agrees to comply with its requirements.

Annex 3: Reporting Procedure for Policy Violations

Submitting a Report to:

Stara Planina Street 12

Haskovo, 6300, Bulgaria

Phone: +359 898 412 180

Email: halongobg@gmail.com

Website: www.halongo.eu

Annex 4: Declaration for Permission to Use Photos/Videos of Children

DECLARATION

I, the undersigned (full name)

_____ ,
in my capacity as the legal representative of (child's full name)

_____ ,
declare that I consent for my son/daughter / the child under my guardianship/custody to participate in the filming and use of photos/videos/interviews. The photos/videos may be used in advertising, promotional, and/or educational materials of the HALO Foundation.

I am familiar with the nature of the event and the conditions for my son's/daughter's participation.

Date:

City:

Declarant: _____
(Signature)

In its external and internal communications, the HALO Foundation undertakes to respect children's rights, ensuring that the dignity of children, families, and communities in which it works is not compromised.

When the organization uses real-life stories and visual materials involving children, it commits to following specific rules and procedures to protect the children and comply with legal requirements established by the UN Convention on the Rights of the Child, the Constitution of the Republic of Bulgaria (Art. 32), the Child Protection Act, and the Personal Data Protection Act.

For filming children for external communications, a prior signed declaration from a parent/guardian will be required, granting permission for the images to be used for the purposes specified in the declaration.

The declaration includes the full names of the parent/guardian and the child (if under 14 years), the signature of the parent/guardian, and the date and city. It is stored for up to 1 year from the signing date with restricted access (accessible only to the Policy Officers, the parent/guardian,

and the child if they are over 14). The information in the declaration is used solely to verify that the child (over 14) and their parent/guardian are aware of the Policy and consent to participation in HALO visual materials.

Filming of children complies with the provisions protecting the child's personal rights, as described in the Child Protection Act, Art. 11a:

- 1. Information and data about a child cannot be disclosed without the consent of their parents or legal representatives, except as provided in Art. 7, para. 1.*
- 2. When a child is subject to a protective measure, information and data about the child cannot be disclosed without the written opinion of the authority that imposed the measure.*
- 3. If the child is over 14, their consent must also be obtained for disclosure of information and data.*

In communications involving children, photos/videos must be decent, respectful, and not depict children as victims. Children should be appropriately dressed, and poses that could be perceived as sexually suggestive must be avoided.

Given the nature of work in vulnerable communities, there may be cases where children could be portrayed as victims, e.g., due to poverty. In such cases, the child's dignity must be preserved while representing reality appropriately.

When sharing real-life stories involving children, if there is a risk of violating children's rights or dignity, the children's names and other identifying information will be changed to ensure their safety.

When publishing content on HALO social media channels, procedures are applied to prevent comments or posts from users that could create risks for children.



Annex 5: Declaration of Consent for Participation in Photos/Videos for Children Aged 14 and Over

DECLARATION

I, the undersigned (full name)

born on

declare that I consent to participate in the filming and use of photos/videos/interviews. The photos/videos may be used in advertising, promotional, and/or educational materials of the HALO Foundation.

I am familiar with the nature of the event and the conditions for participation.

Date:

City:

Declarant: _____
(Signature)

In its external and internal communications, the HALO Foundation undertakes to respect children’s rights, ensuring that the dignity of children, families, and communities in which it works is not compromised.

When the organization uses real-life stories and visual materials involving children, it commits to following specific rules and procedures to protect the children and comply with legal requirements established by the UN Convention on the Rights of the Child, the Constitution of the Republic of Bulgaria (Art. 32), the Child Protection Act, and the Personal Data Protection Act.

For filming children for external communications, a prior signed declaration from a parent/guardian will be required, granting permission for the images to be used for the purposes specified in the declaration.

The declaration contains the full names of the parent/guardian and the child (when under 14), the signature of the parent/guardian, and the date and city. It is stored for up to 1 year from the signing date with restricted access (accessible only to the Policy Officers, the parent/guardian,

and the child if they are over 14). The information is used solely to verify that the child (over 14) and their parent/guardian are aware of the Policy and consent to participation in HALO visual materials.

Filming of children complies with provisions protecting the child's personal rights, as described in the Child Protection Act, Art. 11a:

- 1. Information and data about a child cannot be disclosed without the consent of their parents or legal representatives, except as provided in Art. 7, para. 1.*
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- 3. If the child is over 14, their consent must also be obtained for disclosure of information and data.*

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When sharing real-life stories involving children, if there is a risk of violating children's rights or dignity, the children's names and other identifying information will be changed to ensure their safety.

When publishing content on HALO social media channels, procedures are applied to prevent comments or posts from users that could create risks for children.