

General Director's Instruction No. 7/2024.

on the adoption of the Child Protection Policy

Acting in accordance with my internal regulatory powers as defined in Section 32 of the Organisational and Operational Rules of the Hungarian State Opera (hereinafter referred to as the „**OPERA**”), I hereby issue the following instruction:

1. The OPERA's Child Protection Policy (V1) regulations are set out in the Annex.
2. This instruction will be published by circular letter and will be published in the OPERA IT system.
3. This instruction shall enter into force on the day following its publication.

Budapest, „ *according to time stamp*”

Hungarian State Opera
On behalf of General Director
Dr. ÓKOVÁCS Szilveszter

Dr. FŐZŐ Virág
Deputy General Director

Annex:
Child Protection Policy (V1)

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CHILD PROTECTION POLICY

Version: V1

GENERAL PROVISIONS

1. Purpose of the Child Protection Policy

- 1.1. The purpose of the Child Protection Policy (hereinafter: **the Policy**) is to ensure that
- a) children who come into contact with the Hungarian State Opera (hereinafter referred to as the "**OPERA**") may participate in the education, programmes, performances and tasks organised by the OPERA under safe conditions and with due regard for their psychological and physical needs;
 - b) children can receive effective and appropriate assistance in the event of abuse or endangerment within the scope of this Policy;
 - c) the OPERA staff can safeguard the safety, psychological and physical needs of children who come into contact with the OPERA, while limiting their responsibilities in dealing with children and providing appropriate assistance to children who come to them when necessary.

2. Explanatory provisions

- 2.1. For the purposes of the policy
- a) "**internal whistleblowing system**": means a system or procedure operated under *Act XXV of 2023 on complaints, whistleblowing in the public interest and rules on whistleblowing*, under which an employee covered by the Act may report information on an unlawful or suspected unlawful act or omission or other abuse;
 - b) "**staff member**": any employee or other person engaged in a legal relationship with the OPERA;
 - c) "**child**": a minor under the age of 18 attending a training course organised by the OPERA, employed by the OPERA or attending a performance or other event organised by the OPERA.
 - d) "**secret box**": means a lockable box placed in the building of the Hungarian State Opera and in the Eiffel Art Studios, in which a child in training or employment may place a complaint of abuse or endangerment.

3. Basic principles and values of the Policy

- 3.1. The OPERA organises its activities according to the following principles in order to ensure the safety of children:
- a) **Support**: through its activities, the OPERA supports and facilitates children's development and fulfilment, so that they are able to safely realise and fulfil their potential through the development of their existing skills and resources.
 - b) **Ensuring the right to human dignity**: Every person has the right to be recognised and valued, to have the dignity of feeling valued, respected and accepted in society as a whole and in their smaller communities.
 - c) **Ensuring the right to safety**: every child has the right to live safely and free from all forms of danger, abuse, exploitation and neglect.
 - d) **Prevention**: working to reduce the risk of child abuse by raising awareness, developing good practices and taking all possible positive steps to protect children.
 - e) **Guaranteeing signalling**: ensuring that all staff members are aware of the necessary steps and processes to protect children. Everyone should also know which persons/institutions to report to in situations that arise.
 - f) **Responding appropriately to abuse of children**: a strong commitment to measures to support and protect children when circumstances arise that threaten their well-being. This includes supporting those involved in a particular case, working with relevant professionals/organisations and taking any action to reduce the likelihood of similar incidents recurring.

- g) **Follow-up and review:** the OPERA regularly reviews its procedural protocols, policies and practices in relation to children to identify and remedy any deficiencies and to comply with relevant legislative changes.
- h) **Data security and confidentiality:** the OPERA staff will treat children's personal data confidentially and in accordance with data protection legislation.
- i) **Child-centredness:** taking into account the age, development and maturity of children and the nature of the issue to be decided, their views should be taken into account in decision-making affecting them. Children and their legal representatives should be informed of the necessary information and of the measures and rights that affect them. Children shall be communicated with in an age-appropriate, clear and non-controversial manner.
- j) **Zero tolerance:** the OPERA condemns and considers unacceptable all forms of child abuse, violence, harassment, and abuse. The OPERA strives to create a safe environment and community and will not enter into professional relationships, or immediately terminate existing professional relationships, with persons who pose a danger to children.
- k) **Guarantee of rights enforcement:** in relation to violations of the rights of persons associated with the organisation, the OPERA will investigate all complaints received and take appropriate action, which will be communicated transparently and accurately to the persons concerned.

4. Unacceptable forms of behaviour

- 4.1. The OPERA condemns and deems unacceptable all forms of child abuse and child endangerment, even if the harm is only later discovered by the person concerned or not directly by the child concerned.
- 4.2. Behaviours not accepted by the OPERA include:
 - a) **Physical abuse:** the use of physical violence that causes actual or likely physical injury or suffering.
 - b) **Emotional abuse:** humiliating or degrading emotional treatment that has a long-term and severe negative impact on the child's emotional development, such as: harsh criticism; belittling; persistent stigmatisation, making the child believe that he or she is worthless or unfit for something.
 - c) **Neglect, maltreatment:** the persistent failure to meet a child's basic physical and/or emotional needs, which may result in serious harm to the child's health and development. Neglect includes failure to prevent violence, abuse and maltreatment of children.
 - d) **Sexual abuse:** conduct or any manifestation whereby an adult uses a child to engage in an activity for the purpose of gratifying his or her own sexual interest or desire.
 - e) **Online harassment:** the intentional infliction of repeated and prolonged harm on the Internet, which may be intended to humiliate, threaten, ridicule, ostracise, discredit, or portray in a negative light.
 - f) **Endangering:** when the child's physical, mental, emotional or moral development is hindered or impeded by any circumstance, including conduct, omission or other circumstance, whether self-inflicted or caused by another person. The endangerment itself shall be deemed to have occurred even if no actual harm or detriment results.
 - g) **Exploitation:** the unfair exploitation of a child, such as the performance of work on a child that is high-risk, harmful to the child's education, health or development; or exploitation for financial or material gain. The exploiter typically recruits the child through deception, false promises (love, relationship security), or intimidation, physical and psychological terror or threats of such.
 - h) **Inauthentic child participation:** when children are not aware of the purpose, process and role of their participation; their participation is not voluntary and not based on respect for their voice and dignity. Children do not participate on issues relevant to them, in child-friendly settings or without discrimination; they are not adequately prepared for their role, their safety is not a priority and the outcome of their participation is not accountable.

5. Measures for the protection of children

5.1. Measures concerning the safety of children

- 5.1.1. Children under the age of 12 attending a training course or attending as a performer (rehearsal or performance) must be met by a group leader at designated assembly points at the entrance to the buildings at a specified time. Within the buildings, the group leader shall accompany children under 12 years of age to the training, rehearsal, performance or dressing rooms. The OPERA will not be responsible for accompanying children to rehearsal, training or performance venues who do not arrive at the time specified. Children over the age of 12 may move independently within the OPERA buildings. Children over 12 years of age may use lifts independently.
- 5.1.2. **Persons responsible for children within the OPERA's buildings:**
- a) in **training courses and programmes**, the staff member designated by the course or programme leader,
 - b) in the case of children **arriving for performances**, the supervisor, teacher or adult accompanying them,
 - c) for **children in rehearsals and performances**, a member of staff designated by the Children's Choir Director, the Ballet Master or the designated Extras Manager, according to the children's responsibilities,
 - d) in the case of **children employed in other capacities**, the manager responsible for the organisation of employment and the staff member supervising and directing the work.
- 5.1.3. The physical safety of children is guaranteed by access control systems, security cameras and professionally equipped rooms. Children are not allowed to enter areas that are dangerous for them, and are guided by group guides and directional signs, as well as by the rules of the House Rules.
- 5.1.4. Fire and safety training for children in training and employment must be provided at the start of each training year and before the start of employment.
- 5.1.5. The 'more than one adult' rule should be enforced, so that in all situations where children are present, the presence of two or more adults prevents the possibility of unacceptable behaviour.
- 5.1.6. During opera programmes organised outside the OPERA premises (e.g. tours, guest performances), the staff designated by the head of the training or programme will ensure the safety of children.

5.2. Communication and data protection

- 5.2.1. The OPERA's relevant staff will monitor and moderate communication on both open and closed online communication platforms and channels and monitor the safety of the children involved.
- 5.2.2. The OPERA staff are obliged to handle children's contact data in accordance with the data protection provisions, and it is strictly forbidden to use these data for private contact.
- 5.2.3. The OPERA staff will contact children under 12 years of age through the contact details of their guardians and may contact children over 12 years of age directly, in all cases informing the guardians at the same time.
- 5.2.4. The OPERA provides specific information on the processing of personal data. The relevant privacy statement is available at <https://www.opera.hu/hu/tajekoztatok/>.

5.3. Employee selection

- 5.3.1. The OPERA makes every effort to ensure that children who come into contact with the OPERA are surrounded by adults who are committed to protecting them and ensuring their rights, and

therefore the OPERA pays particular attention to the appropriate selection of new staff. To this end, the OPERA does not employ any person in a civil law relationship beyond the limitation of Article 44/A of Act I of 2012 on the Labour Code (hereinafter: **the Labour Code**):

- a) who has previously committed a criminal offence against minors;
- b) who has previously abused or endangered a child;
- c) who, at the time of the preliminary screening, is found to have been involved in any atrocity, border crossing, complaint or allegation against children in his or her change of employment.

5.3.2. In the recruitment and selection of new staff, the HR representative:

- a) ask for references from the applicants,
- b) interviews prospective employees in person or online, answering competency questions,
- c) require proof of appropriate training and qualifications,
- d) require a certificate of good character not older than 30 days for jobs involving children,
- e) require a probationary period of 3 months for jobs involving children.

5.4. Taking special account of labour law provisions

5.4.1. Staff members must pay particular attention to the provisions of the Labour Code on the employment of children (young workers), which stipulate that:

- a) the maximum daily working time for children is 8 hours;
- b) children under the age of 16 may work up to 6 hours per day;
- c) the maximum scheduled daily working time of a child shall not exceed 8 hours and the maximum scheduled daily working time of a child under 16 years of age shall not exceed 6 hours;
- d) for the child
 - exceptional working time may not be ordered,
 - working hours can be scheduled in accordance with the provisions 97(3) b) and c) of the Labour Code,
 - night work (between 22.00 and 06.00) may not be scheduled,
 - a maximum working time limit of one week may be imposed,
 - a break shall be at least 30 minutes for scheduled daily working time exceeding 4.5 hours and at least 45 minutes for scheduled daily working time exceeding 6 hours, and
 - a daily rest period shall be at least 12 hours.

5.5. Raising awareness of the Policy

5.5.1. With regard to staff members

- a) the policy shall be published and kept available on the OPERA's internal communication system and website,
- b) the OPERA will provide e-learning to promote awareness of the policy, which must be completed by all staff working with children.

5.5.2. With regard to children and their legal representatives:

The OPERA will make the Directive and related supporting materials available to children in a separate, easily understandable format (by e-mail and on the OPERA website). The Code of Conduct for Children and an extract from the Directive are attached as Annex 2 to the Directive.

Guardians of children can find the Directive on the OPERA website.

5.6. Application of age classification

5.6.1. The OPERA shall provide age classification of its performances and events in order to protect children as far as possible from any negative effects that may have a harmful effect on their physical, mental and moral development. The age classification shall be reasonably based on the classification applicable to the broadcasting programmes in accordance with the specific law.

6. Measures to ensure the rights of the child

- 6.1. The staff member responsible for children shall communicate information concerning children in a language that children can understand, and at the same time inform their guardians, in person or through other appropriate channels.
- 6.2. Both legal guardians must be involved in the handling of official matters or matters requiring a statement of rights concerning the child.
- 6.3. The staff responsible for children are regularly, but at least once a year, informed that children can express their opinions and complaints and that they can use the "secret box" to do so. The OPERA staff will respect and take into account the views of children and the expression of such views shall not have negative consequences for children. Once the children's views have been sought, the training or programme manager will explain the outcome of the request to the children. Following the survey, the head of the training or programme shall inform the children whether and what action has been taken in the OPERA in response to their expression of opinion.

PROCEDURAL RULES

7. Reporting and case management procedures

- 7.1. If any adult experiences conduct that violates this policy, they must report the incident within 24 hours of becoming aware of it through the internal abuse reporting system (email to bejelentes@opera.hu or via the OperaTutti app).
- 7.2. It is also possible to report abuse and endangerment for children in training or employment by using the "secret box" in corridor C of the Eiffel Art Studios and in the Portrait Gallery of the Opera House. The key to the box is picked up once a week by a member of staff from the Ballet Directorate in the Eiffel Workshop and by a member of staff designated in the internal abuse reporting system in the Opera House building, who empties the contents of the box. The person emptying the box shall, if necessary, act in accordance with point 7.1.
- 7.3. **„Confidentiality Protocol“**
 - a) In using the "confidentiality protocol", the staff member approached by the child should accompany the child through the process - talking a lot, working with the child to understand why it is important to tell others about what is happening, so that others can find out.
 - b) The staff member listens carefully to the child and accepts what he or she hears, without putting too much pressure on the child to give as many details as possible.
 - c) The staff member reassures the child that he or she has made the right choice in sharing the information.
 - d) The staff member informs the child that this information cannot remain a complete secret, it must be shared with the appropriate persons. It is important that the adult involved does not share the confided secret with anyone else, nor ask the person concerned to share it, until the child has reached a stage in his or her own mental processes where he or she can give permission (because he or she is already prepared for the secret to be released and for outside parties to know), unless there is a suspicion of criminal activity.
 - e) The staff member will inform the child of the next steps to be taken in relation to the case.
 - f) Following an immediate assessment of the situation and risk assessment, the staff member will make every effort to ensure that the child(ren) concerned are kept safe.
 - g) The staff member will document the report and act as outlined in 7.1.
- 7.4. **Procedure of the investigating officer:**

The staff member designated in the internal whistleblowing system will investigate the information/report received as described in point 7.1 and will proceed in accordance with the

procedures set out in the policy on handling incidents of breaches of organisational integrity, taking into account the following:

- a) Provide factual information to staff on specific incidents, depending on the specific nature of the case management, taking into account the best interests of the children.
- b) If necessary, contact the members of the child protection referral system, inform the guardians, file a complaint.
- c) Forward his/her report to the competent Family and Child Welfare Service, guardianship authority or child protection institution **within 72 hours in the case of serious endangerment** or **within 8 days in the case of suspected endangerment** and inform the guardian of the child concerned immediately after becoming aware of the matter.
- d) If the child reports that he/she has been abused, help him/her to know what other forums to turn to (legal aid services, victim support services, authorities, etc.)
- e) In the event of a reasonable suspicion of infringement, take the necessary measures to ensure that the aggrieved party has access to legal remedies.
- f) Inform the person exercising the employer's rights or, in the case of contract staff, the senior manager who initiated the contract, if action may be necessary.
- g) After the conclusion of the specific case, hold a meeting with the staff member concerned, as necessary, to discuss the case and propose further steps to prevent similar incidents. After the incident, a post-incident debriefing session should be provided for both staff and the children's community.

8. Legal consequences

- 8.1. In addition to the sanctions provided for in the Policy on the handling of incidents with breach of organisational integrity, the following sanctions may be applied for breaches of the rules of the Policy:
 - a) In the case of employees working under other employment relationships, the head of the department initiating the contract shall act in accordance with the rules on breach of contract.
 - b) In the event of abuse or endangerment by a child's caretaker, the OPERA may, at the discretion of the senior staff member responsible for the child, terminate the caretaker's contract with the child or his/her caretaker.
 - c) In the case of child abuse or endangerment, the senior member of staff responsible for the child shall decide on the action to be taken against the child and, in serious or repeated cases, on the termination of the contract with the child.
- 8.2. The legal consequences applicable in the event of a false report are the same as those set out in the Policy on the handling of incidents with breach of organisational integrity (criminal proceedings, compensation).

ANNEXES

Annex 1

Behaviour requirements towards children

As an employee of the OPERA, I agree to comply with the following:

1. I respect the rights, background, culture and beliefs of children, their school obligations, the start and end time and breaks of their training, rehearsals, programmes and working hours.
2. I communicate with children in an appropriate tone of voice, both written and verbal, avoiding abusive, degrading, stigmatising, condescending, belittling, sarcastic communication. I encourage open, non-violent, respectful communication between children.
3. I will not use physical punishment. I have zero tolerance for all forms of violence and abuse against children.
4. I seek to create a positive, supportive atmosphere throughout the time I am working with children, providing appropriate feedback on their performance. If I must give negative feedback, I do so objectively, in the gentlest possible way.
5. I refrain from sexualising behaviour in the presence of children and from allowing such behaviour (e.g. joking, ambiguous comments, games).
6. I do not establish a relationship with children for private reasons.
7. I will touch a child when his or her physical or emotional well-being warrants it, and I will do so in a way that does not violate his or her right to bodily integrity and sense of safety. When rehearsal or training requires it, I will use physical touch only to illustrate a specific movement sequence for the child or to adjust the child's posture, for example, when the adjustment of postures that form the basis of classical ballet specifically requires touching certain parts of the body. Physical contact should not go beyond the limits and extent specifically required for the instruction and should not include the use of any force or instrument. I will refrain from inappropriate physical contact with children.
8. I will respect the privacy of the child and will not disclose to any unauthorised person any information that I have learned about the child's private life.
9. I will not take photographs of children without the prior permission of the child or their legal guardian.
10. I will ensure that any reports made by or concerning children are always considered, reported and recorded, and I will take care not to increase the "victimisation" of the person concerned. I listen to what children have to say and respond appropriately.
11. I will immediately report any possible incidents of misconduct between the OPERA staff, other adults, or children.

Annex 2

Information for children

The OPERA provides you with the following:

Your safety is important!

We do our best to create a calm and safe environment for you.

We're looking out for you!

Your parents are primarily responsible for you, but you are looked after by the adults who work here at the OPERA. They will help if they see a child having any kind of bad experience.

Let us know if there's a problem!

If you feel unsafe or someone is hurting you, you can report it here:

- by dropping a message in the “secret box”, even anonymously,
- at this email address: bejelentes@opera.hu,
- to any the OPERA adult staff member.

You'll find the “**secret box**” just past the Opera House artists' entrance, on the left, in the Portrait Gallery, and in the Eiffel Workshops in corridor C, next to the coffee and snack machines.

Rules of behaviour:

As a child learning or working at the OPERA, I agree to comply with the following:

1. I arrive on time and prepared for my training, rehearsal, performance or work, helping other children and adults. I try to do my best in my training, rehearsals, performances, and work, and I actively participate in them.
2. For my own safety, I will only enter and move around the OPERA buildings where necessary and permitted.
3. I dress appropriately in clean clothes, and if the OPERA requires me to wear a uniform or costume, I wear it during training, rehearsals, performances, or work.
4. I'll let someone know if I'm sick or feel sick.
5. I treat my teachers, the OPERA staff and other children with respect and communicate with them in an appropriate tone of voice.
6. I keep the changing room tidy and clean, and I throw the rubbish in the bin.