SAFE POL

SAFETY AND SAFEGARD POLICY

SAFE POL ASSOCIATION

ABBREVIATIONS

SGP – Safety and safeguarding policy

CS – Child Safeguarding

SG – Safeguarding

CP – Child Protection

DSO – Designated Safeguarding Officer/ Responsible Person

CPO – Child Protection Officer/Responsible Person

VoT – Victim of Trafficking

UNCRC – United Nations Convention on the Rights of the Children

SAFE POL ASSOCIATION

GLOSSARY

Child - a child means every human being below the age of eighteen years unless under the law applicable to the child, majority is attained earlier. (Art.1 UNCRC)

Child abuse - means any voluntary action of a person who is in a relationship of responsibility, trust or authority towards him, which endangers life, physical, mental, spiritual, moral or social development, bodily integrity, the physical or mental health of the child, and is classified as physical, emotional, psychological, sexual and economic abuse.

Child neglect - neglect of the child means the omission, whether voluntary or involuntary, of a person responsible for the upbringing, care or education of the child to take any action which may involve the fulfillment of that life-threatening responsibility, physical or mental development, spiritual, moral or social, bodily integrity, physical or mental health of the child and can take many forms: food, clothing, neglect of hygiene, medical neglect, educational neglect, emotional neglect or abandonment of the child / family abandonment, which is the most serious form of neglect.

Protecting the child from abuse, neglect, exploitation and any form of violence - the child has the right to be protected from abuse, neglect, exploitation, trafficking, illegal migration, abduction, violence, internet pornography, and any form of violence, regardless of the environment in which he or she finds himself: family, educational institutions, medical, protection, crime investigation and rehabilitation/detention environments, internet, media, jobs, sports environments, community, etc.

The potential victim of trafficking - the person identified before being exploited, during the operation or after escaping trafficking and showing signs of trafficking. It is primarily identified by community members or representatives of organizations, non-specialized institutions in the field. This differs from a presumed victim, whose definition appears below.

The alleged victim of trafficking in persons - the person indicating that he/she has been trafficked, the decision on his/her status being made on the basis of a prior evaluation by the police, prosecutor, international/intergovernmental organizations, non-governmental organizations specialized in the protection and assistance of victims of trafficking of people; even if the person refuses to cooperate with the police or is still in the recovery and reflection period.

Identified victims of trafficking in persons - the person gaining legal status as injured party/ witness after working with the criminal investigation bodies from a legal perspective, or after specialized institutions or organizations give him the status from the victim's perspective.

Referral - represents the transmission of the victim of trafficking to protection and assistance service providers.

Victim assistance services for victims of trafficking in persons - all services provided to victims of trafficking in persons provided by the legal norms in force.

Emergency services - the set of measures and actions required by the provider when identifying victims of trafficking, to overcome a crisis.

Long-term services - all the necessary measures and actions undertaken by the providers for the social reintegration of victims of trafficking in person.

Social inclusion - a set of multidimensional measures and actions in the areas of social protection, employment, housing, education, health, information, communication, mobility, security, justice and culture, aimed at combating social exclusion.

Case intervention - all the necessary measures or actions that are taken to overcome and resolve the crisis or the difficulty in which a victim of trafficking in person is.

Case manager – the social worker or psychologist, member of the multidisciplinary team that coordinates, monitors and evaluates the performance of specific activities for the protection and social reintegration of victims of human trafficking.

Safeguarding - measures taken to protect individuals from harm, abuse, exploitation, and neglect.

Consent- cannot be given where there is coercion, manipulation, or power imbalance.

Scope and Purpose of the Safeguarding Policy

The Safeguarding Policy applies to all members and representatives of SAFE POL, including the President, employees, temporary employees, collaborators, students, volunteers, partners, visitors and any other persons who participate in the Association's activities or have access to its information assets. Compliance with this Policy is mandatory for all persons within its scope.

SAFE POL is committed to protecting and promoting the safety, dignity, rights and well-being of all direct and indirect beneficiaries, including children, young people, adults and their families. The Association is committed to maintaining a safe, respectful and inclusive environment in all its programmes, activities and interactions, in accordance with its statutory responsibilities, applicable legislation, relevant government guidelines and recognised good practices.

The purpose of this Policy is to:

- Protect all beneficiaries, regardless of age, disability, gender identity, race, ethnic origin, religion or belief, sex, sexual orientation or any other characteristic protected by applicable law, as well as their families, from harm, abuse, neglect, exploitation and violence.
- Prevent all forms of abuse, neglect, exploitation, violence and misconduct within the Association's programmes, activities and working relationships.
- Establish clear standards of conduct, responsibilities and accountability for all persons covered by this Policy.
- Ensure that safe, accessible, confidential and victim-centred reporting and response mechanisms are in place to address safeguarding concerns.
- Promote a safeguarding culture based on respect, equality, dignity, inclusion and the protection of individual rights.

SAFE POL adheres to a zero-tolerance approach towards any form of abuse, exploitation, violence or other harmful conduct committed by its employees, volunteers, partners, representatives or any other persons involved in its activities. Safeguarding is a shared responsibility and a core organisational priority.

In implementing this Policy, SAFE POL is guided by the following principles:

- **The best interests and well-being of beneficiaries**: The safety, dignity, rights and well-being of beneficiaries are paramount in all the Association's activities and decision-making processes.
- **Do no harm:** SAFE POL is committed to ensuring that all its activities and interventions are planned and implemented in a manner that prevents or minimizes the risk of harm to beneficiaries, their families, communities, employees, volunteers, collaborators and other people involved. The Association shall identify, assess and mitigate any potential physical,

psychological, social, legal or reputational risks arising from its programs and activities. Where risks cannot be adequately mitigated or the potential harm is disproportionate to the intended benefits, SAFE POL shall modify, suspend or discontinue the activity concerned.

- **Equality and non-discrimination**: All beneficiaries have an equal right to protection from harm, abuse and exploitation, without discrimination.
- **Recognition of vulnerability**: SAFE POL recognises that some individuals may face an increased risk of harm due to previous traumatic experiences, dependency, disability, communication needs or other individual circumstances. Appropriate measures shall be taken to address their specific needs and reduce risks.
- **Participation and partnership**: Cooperation with children, young people, adults, parents, legal guardians, caregivers and relevant public authorities, agencies and institutions is essential to promoting well-being and ensuring effective safeguarding.
- **Prevention, reporting and accountability**: All persons covered by this Policy are responsible for complying with its requirements, identifying and reporting safeguarding concerns, and contributing to the prevention of harm.

All persons within the scope of this Policy are required to act in accordance with its provisions and to contribute actively to maintaining a safe environment in which all beneficiaries are treated with dignity and respect.

Legal and Policy Framework

This Safety and Safeguarding Policy are developed in accordance with the applicable European Union and Romanian legal framework, as well as relevant international standards and policy strategies concerning the protection of children and vulnerable persons, the prevention of abuse and exploitation, and the prevention and combating of human trafficking. All activities shall comply with the following instruments, as applicable:

1. European Union legislation and policy instruments

- Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, as amended by Directive (EU) 2024/1712.
- Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime.
- The EU Strategy on the Rights of the Child, adopted in 2021.
- The EU Strategy to tackle Organised Crime 2021–2025.
- The EU Strategy on Combatting Trafficking in Human Beings 2021–2025.

The above policy strategies are referenced as relevant strategic frameworks, where applicable, alongside the binding legal instruments in force.

2. Romanian national legislation

- Law No. 272/2004 on the protection and promotion of children's rights, as subsequently amended and supplemented.
- Law No. 678/2001 on preventing and combating trafficking in persons, as subsequently amended and supplemented.
- Law No. 286/2009 on the Criminal Code, including the provisions concerning trafficking in persons, trafficking in minors, exploitation, sexual offences and other relevant offences.
- Government Decision No. 49/2011, approving the framework methodology for the prevention and intervention of multidisciplinary teams and networks in cases of child violence and domestic violence, including cases involving exploited children and children at risk of trafficking.
- Romania's National Strategy against Trafficking in Persons 2024–2028, as a relevant national policy framework.

This Policy shall be implemented in accordance with the applicable legislation in force in Romania. Where necessary, SAFE POL will cooperate with the competent Romanian authorities and child protection services to ensure the safety, protection and appropriate support of children and other persons at risk.

Privacy and protection of personal data

SAFE POL requires all employees, volunteers, contributors, and members of management to strictly maintain confidentiality in relation to all personal data and sensitive information obtained through their work. Personal data shall be collected, processed, stored, and shared only in compliance with applicable data protection legislation.

In accordance with **Law no. 677/2001**, SAFE POL processes personal data solely for legitimate, specified, and lawful purposes, and in line with the principles of the rules and regulations regarding personal data protection. SAFE POL is registered as a Personal Data Operator with the National Authority for the Supervision of the Processing of Personal Data under registration number **37370**.

Confidentiality may be lawfully limited where disclosure is necessary to protect the vital interests of a beneficiary. Information may be shared with the competent authorities if there is a **risk of harm**, if a beneficiary is in **imminent danger**, or where there is reasonable suspicion that a **criminal offence** has been committed, in accordance with legal obligations and safeguarding procedures.

Child Safeguarding and Safe Interaction with Children

In all activities carried out by the organization involving children, including educational, recreational, consultation, training and other activities, all members of the association, including the president, employees, temporary employees, collaborators, students, volunteers and other persons acting on behalf of the organization shall:

- Ensure that all interactions with children are safe, respectful, age-appropriate, inclusive and consistent with the child's best interests, dignity, rights and individual needs;
- Treat every child with respect and without discrimination based on gender, age, disability, ethnicity, nationality, religion, social background or any other status;
- Ensure that children's participation is voluntary, appropriate to their age and maturity, and based on information they can understand. Children shall be informed about the purpose of activities, what participation involves, their right to decline or withdraw, and how they can seek help or raise concerns;
- Obtain the child's informed assent and, where required by applicable law or organizational procedures, the informed consent of their parent or legal guardian before participation, considering the nature and risks of the activity;
- Maintain appropriate professional boundaries and prohibit any form of physical, sexual, psychological or emotional abuse, exploitation, humiliation, intimidation, grooming or other inappropriate conduct towards children;
- Avoid situations in which a child is unnecessarily isolated with an adult. Where individual interaction is necessary, it shall take place in an appropriate, observable and safe setting.
- Use age-appropriate and accessible methods of communication and participation, considering children's language, developmental stage, disability and other specific needs;
- Respect children's privacy and protect their personal information. Information about a child shall be collected, recorded, stored and shared only, when necessary, lawfully and securely, and strictly on a need-to-know basis;
- Never pressure a child to disclose personal experiences, abuse, exploitation or trafficking-related experiences. Staff shall listen calmly and respectfully if a child chooses to disclose a concern, avoid leading questions, refrain from conducting their own investigation, and explain the next steps in an age-appropriate manner;
- Ensure that children know how to report inappropriate behaviour, express concerns or request assistance through safe, accessible and child-friendly reporting channels;
- Report any safeguarding concern, suspected abuse, exploitation, trafficking or inappropriate conduct in accordance with the reporting procedure set out in page 9;
- Ensure that all persons working directly with children receive appropriate safeguarding guidance and understand their responsibilities before participating in activities involving children.

No child shall be subjected to punishment, exclusion, discrimination or any other adverse treatment for raising a concern, refusing to participate in an activity or withdrawing from participation.

Prohibited Conduct

Employees, temporary employees, collaborators, students, volunteers must not:

- Engage in any form of sexual activity with beneficiaries
- Use physical punishment, degrading treatment, or intimidation
- Exploit beneficiaries or families emotionally, financially, or socially
- Exchange aid, services, or protection for favours of any kind
- Be alone with a beneficiary unapproved or unsafe settings
- Take or share photos, videos or personal data without informed consent
- Use beneficiaries' stories or images without consent of it or its family/ guardian

Actions and Prevention Actions

Recruitment and Training

SAFE POL initiates the recruitment and selection process when staff need exceed the internal offer of employees as number or competencies. The reasons for the need for staffing may be getting a larger number of projects, promoting some employees, deciding others to leave the association.

Personnel recruitment is the process by which SAFE POL seeks and attracts suitable people to fill vacancies. The recruitment of staff and volunteers is done considering the needs of SAFE POL, as well as the needs which are required to ensure the beneficiaries' security.

Through selection, a sorting of recruitment conditions is made, according to criteria that consider the training, skills, and capacity of each candidate to fill a certain position. Employee recruitment is the final stage of an extensive process and is carried out in compliance with the labor law in force. All the actions necessary to establish the work, function, workplace in which a person is employed shall be completed by concluding the individual labor contract.

The SAFE POL Association organizes training sessions at least once a year or whenever it is considered necessary for its employees and volunteers according to the identified needs.

Efforts to implement safety and protection policies and prevent risks

SAFE POL commits to:

- Report any suspicion of breach of the code of conduct or potential abuse to the beneficiaries
- Implementing codes of conduct and clear behaviour standards
- Using safe, approved spaces for interviews and activities

- Applying a two-person rule where possible, especially with children
- Ensuring gender- and age-appropriate staffing
- Sharing safeguarding information with beneficiaries and families in accessible formats

Reporting safety and security concerns

- Multiple, accessible reporting mechanisms are available
- Reports can be made confidentially or anonymously
- Safeguarding concerns may be reported by children, young people, parents or family members and their guardians, and other agencies/institutions, staff, or community members
- Retaliation against anyone who raises a concern is strictly prohibited

Reporting Procedure for Safeguarding Concerns

If, during any activity or interaction involving children within the organization, a member of staff, temporary employees, collaborators, students, volunteers, or other person acting on behalf of the organization becomes aware of a child at risk, a potential victim of trafficking, suspected abuse, exploitation, neglect or any other safeguarding concern, the following procedure shall apply:

1. Ensure immediate safety. Take appropriate and proportionate action to protect the child from immediate harm. Where there is imminent danger or an urgent medical need, contact the relevant emergency services without delay.

2. Listen and respond appropriately. If a child discloses a concern, remain calm, listen without judgement, acknowledge the child's account and avoid leading questions or requests for unnecessary details. Do not confront the alleged perpetrator or undertake an independent investigation.

3. Record the concern factually. Document the information disclosed or observed as soon as possible, using objective language and distinguishing between direct observations, the child's own words and information received from others. Record only information necessary for safeguarding purposes and store it securely.

4. Report the concern promptly. Report the concern immediately where urgent action is required and otherwise without undue delay, normally on the same day, to the organization's designated safeguarding contact. If that person is implicated in the concern, unavailable or unable to act appropriately, report directly to the competent authority or use the alternative reporting channel established by the organization.

5. Refer to the competent authorities. The designated safeguarding contact shall ensure that the concern is referred to the competent national child protection authority, law enforcement authority or relevant National Referral Mechanism, as applicable, in

accordance with national law and established procedures. Referral shall not be delayed where immediate protective action is required.

6. Protect confidentiality. Information shall be shared only with persons and authorities who need it to assess the concern, protect the child or fulfil legal obligations. Identifying information shall not be shared with other staff or external parties unless necessary and lawful.

7. Respect the child's rights and best interests. The child shall be treated with dignity and sensitivity throughout the process. Information about reporting and referral shall be explained in an age-appropriate manner, where safe and appropriate. The child's views shall be considered in accordance with their age and maturity, without compromising immediate safety or statutory safeguarding obligations.

8. Maintain appropriate follow-up. The designated safeguarding contact shall document the referral and any follow-up actions securely, monitor the implementation of safeguarding measures within the organization's remit, and cooperate with the competent authorities as required.

All persons acting on behalf of the organization shall maintain confidentiality and shall never promise absolute confidentiality to a child or another person disclosing a safeguarding concern, as information may need to be shared to protect a child or comply with legal obligations.

All safeguarding concerns shall be handled in accordance with applicable national legislation, relevant child protection and anti-trafficking procedures, and the SAFE POL's safeguarding policies. The child's best interests, safety, dignity and protection from further harm shall remain paramount throughout the process.



1.Identification of a concern

A staff member, volunteer, intern or other person acting on behalf of the organization observes a risk or receives a disclosure involving a child.



2. Immediate safety assessment

Is the child in immediate danger or in need of urgent medical assistance?

YES	NO
Ensure immediate safety and contact emergency services (112, where applicable).	Proceed promptly with internal reporting and referral.

3. Factual recording

Record observations or disclosures objectively, using the child's own words where relevant. Do not investigate or ask leading questions.



4.Report on the Designated Safeguarding Contact

Report immediately in urgent cases and otherwise without undue delay, normally on the same day.

5. Referral to competent authorities

The safeguarding contact refers to the competent child protection authority, law enforcement authority or National Referral Mechanism, as applicable under national law.



6. Confidential documentation and follow-up

Securely document the report, restrict access to necessary people, implement safeguarding measures and cooperate with the competent authorities.

Notifications: Reporting /notification can be done verbally, written notice or by telephone and if expressly requested, the notification can be made anonymously by any means.

Solving the notification: Within 72 hours from the date of receipt of the notification, the person responsible has an obligation to carry out the first steps.

! Mention: Initiation and internal steps to solve potential abuses do not prevent and unduly delay the notification of law enforcement authorities when such referral is mandatory.

Sanctions

In the event of a breach of the rules, disciplinary sanctions will be imposed in accordance with the applicable personnel regulations, the Code of Conduct, and the relevant internal rules and regulations.

Roles and Responsibilities

- **Board and Senior Management**: Oversight and accountability
- **Safeguarding Focal Point(s)**: Receive reports, coordinate response, and referrals
- **All Personnel**: Uphold this policy and report concerns immediately

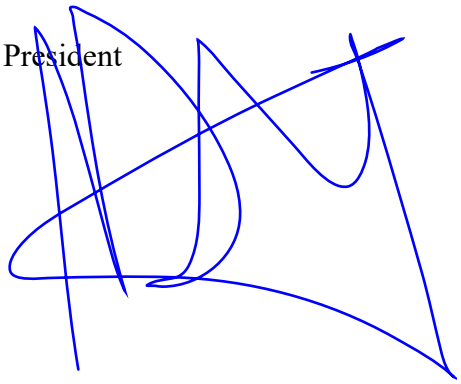
Monitoring and Review

This policy will be:

- Communicated to all personnel and partners
- Reviewed at least annually
- Updated based on learning, beneficiaries feedback, and legal changes, when necessary

Creation date: This policy was created on 31.01.2018 and produces its effects on the date of 01.02.2018.
Updates: This safeguarding policy has undergone updates during the years 2020-2026
Date of revision: September 2026 and takes effect from 1 October 2026.

President



Date

14.10.2026