



ASOCIAȚIA „BUNĂ ZIUA,
COPII DIN ROMÂNIA”



CHILD SAFEGUARDING POLICY

We believe

that small things done with
love make BIG differences
in people's lives.

BZRO advocates for the valorization of children and their potential, offers support and counseling for parents in order for them to develop parental skills, involves community members in volunteering, ensures and diversifies work methodologies in social assistance for families and child.

Vision

„Bună Ziua, Copii din România” is about people, wellbeing and progress. We believe in a world where everyone is free and equal in dignity and rights and also feels valued, loved and accepted.

Mission

Our mission is to support children, young people and families to live in dignity and wellbeing. We believe that small things done with love make big differences in people's lives.



I. Introduction

The protection and promotion of children's rights are the basis of the activity of "Bună Ziua Copii din România" (BZRO) in providing social services, projects, campaigns and procedures and constitutes its permanent concern, both internally and in the community.

BZRO promotes and applies measures to protect children against any form of intimidation, discrimination, abuse, neglect, exploitation, inhuman or degrading treatment.

This policy is a support in order to ensure the children's rights are respected when providing social services by all BZRO employees during their professional practice in this NGO. Once they read this policy, BZRO employees have the obligation to put it into practice and BZRO takes measures to discourage, prevent and report any behavior that violates the rights of any child.

The purpose of this policy is to regulate the way the organization's activity is carried out in a way that the children we come into contact (directly or indirectly) are protected and also the most appropriate measures are taken when implementing the programs or activities at the institutional level so that no child should be harmed.

Children's rights policy of BZRO is based on:

- The vision, mission, values of "Bună Ziua Copii din România"
- The United Nations Convention on the Rights of the Child
- Charter Beneficiaries of BZRO
- Methodological Guide of BZRO on the intervention and prevention for multidisciplinary team in case of child abuse, neglect and exploitation of children
- Respecting the dignity and interest of the beneficiaries
- Quality of services: professionalism, dedication, flexibility, confidentiality
- Attention to the development of programs in order to meet the needs of the community
- Assumed responsibility, teamwork, mutual trust and respect
- Active and open partnerships with state institutions and other NGOs

Governments must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them.

(The Convention on the Rights of the Child, Article 19)

A. Key principals of the Child Rights Protection Policy

The child must be treated with respect, and the state is obliged to ensure the best conditions for development, to respect the rights of the child and child protection rules, according to the UN Convention on the Rights of the Child. Children's rights must be applied to all children without discrimination.

1. Respecting the individuality of each child;
2. All children have an equal right to protection and wellbeing.
3. Ensuring equal access to social services by excluding privileges and eliminating any form of discrimination;
4. Respecting the best interest of the child in all the activities and programs carried out by BZRO, without endangering his security.
5. Ensuring the access to information regarding fundamental rights, legal protection measures, as well as the possibility of contesting the decision to grant services;
6. Ensuring protection is the responsibility of every employee, regardless the department in which they work;
7. Ensuring data remains confidential;
8. Respecting the dignity of the child;
9. Promoting of children's rights;
10. Compliance with the legal framework of national and international child protection legislation and policies.
11. Responsibility to help partners/collaborators meet minimum child protection requirements.

A. Definitions:

Child abuse or maltreatment represents all forms of physical and/or emotional treatment, sexual abuse, neglect treatment, commercial or other form of exploitation, trafficking that

have as consequences actual or potential damage to the child's health, survival, development or his dignity, in the context of a relationship of responsibility, trust or power.

Physical abuse: actual or potential physical harm by another person, adult or child. It can involve hitting, shaking, poisoning, drowning and burning. Physical harm can also be caused when a parent or caregiver produces the symptoms or deliberately induces the illness to a child.

Emotional abuse: Persistent emotional maltreatment that has a negative child's emotional development. Emotionally abusive acts include restricting movement, degrading, humiliating, bullying (including cyberbullying) and threatening, scaring, discriminating, ridiculing or other non-physical forms of hostile treatment or rejection.

Sexual abuse: Forcing or encouraging a child to take part in sexual activities that he or she does not fully understand and has little choice about consenting to. This may include, but is not limited to, rape, oral sex, penetration or non-penetrative acts such as masturbation, kissing, rubbing and touching. It can also include involving children in viewing or producing sexual images, watching sexual activities and encouraging children to behave in sexually inappropriate ways.

The organization's activity: as a clarification, the term "activity" used in this policy and safeguarding procedures refers to the programs that "Bună Ziua Copii din România" carries out for the benefit of people (children and adults) and communities and of our activities, as well as all other departments such as the finance department, human resources department, marketing, executive and administrative office.

Whistle blowing: is the process by which employees or associates warn, report or disclose any reason for concern/suspicion, harm, including fraud, corruption and security related incidents.

Beneficiary of the request – any person who finds himself in a situation of imminent danger or difficulty or risk.

Child - a person who has not reached the age of 18 and has not acquired full exercise capacity, under the law.

Commercial exploitation: the exploitation of a child through work or other activities for the benefit of others and to the detriment of the child's physical or mental health, education, moral or social-emotional development. This includes but is not limited to child labour.

Child sexual exploitation: A form of sexual abuse involving children who are engaged in any sexual activity in exchange for money, gifts, food, lodging, affection, status or anything else they or their family need. It usually involves manipulating or coercing a child, which may involve befriending children, gaining their trust, and subjugating them with drugs and alcohol. The abusive relationship between the victim and the perpetrator involves an imbalance of power when the victim's options are limited. It is a form of abuse that can be misunderstood by children and adults as consensual.

Child sexual exploitation manifests itself in different ways. It may involve an older perpetrator exerting financial, emotional or physical control over a young person. It can involve peers manipulating or coercing victims into sexual activities, sometimes within gangs and gang-affected neighborhoods. It may also involve opportunistic or organized networks of perpetrators who have a financial benefit from trafficking young victims between different locations to engage in sexual activities with multiple men.

Family - parents and their children; Extended family - the child, his parents and relatives up to the IV degree;

Safeguarding - describes the measures taken to prevent the reporting of an incident/cause for concern and to respond to any kind of harm and abuse and to protect the health, wellbeing and rights of anyone who is associated with "Bună Ziua Copii din România, including the employees.

Case management is the process by which "Bună Ziua Copii din Romania" investigates a safety violation suspicion from the moment the person responsible or the Team responsible for guaranteeing safety receives a notification/complaint until the case is closed.

Monitoring - analysis of the intervention in a regular, structured and planned manner together with all those involved to evaluate the activity of the specialists working on the case (in terms of the coherence of the interventions and the sequence of activities) according to

the qualitative and quantitative indicators established to measure the interventions carried out, to reassess the beneficiary's situation and possibly revising the intervention plan.

Reason for worry: It is the reason that causes anxiety and worry. In the context of operational procedures, the reason for concern refers to a possible, likely or true safety incident. Reporting a concern in the context of ensuring safety should primarily be seen as a safeguard against all forms of harm in order to comply with our duty of care and diligence. Our duty is to protect the safety of the child. Other terms may also be used, such as complaint, which is a statement about a safety incident that has occurred. Another cause for concern could also be described as a disclosure that occurs when a person discloses to another person (by any means) an incident of abuse that has directly affected them, or that they have witnessed. In the context of standard operating procedures (SOP), terms such as "reason for concern", "concern" or "incident reporting" are used to describe a complaint or disclosure. A cause for concern should be brought to the attention of a person/team with safety assurance duties who will be responsible for receiving and handling the response to complaints about alleged incidents.

Neglect and negligent treatment refers to a persistent failure to meet the basic physical and/or psychological needs of the child, which can lead to serious damage of the physical health or spiritual, moral and mental development of the child. This includes failure to properly supervise and protect children from harm and to provide food, shelter and safe living/working conditions. It can also involve maternal neglect during pregnancy as a result of drug or alcohol misuse, as well as neglect and mistreatment of a disabled child.

Partners: this policy and the procedures to guarantee a clear boundary between "Bună Ziua Copii din România" and its partners. Each partner is independently responsible for managing its own safety systems and processes, including managing incidents related to their activity, even if the activity implements in the partnership. Safety assurance agreements must be agreed in the planning stage of an association and in service level agreements, memorandums, contracts, etc.

Staff. In the context of this policy, the term staff includes any person who has a role within "Bună Ziua Copii din România". This category includes all paid employees, volunteers, consultants, collaborators, part-time employees and administrators.

Child protection is the responsibility of "Bună Ziua Copii din România" to ensure that their staff, programmes, projects and activities do not harm children, do not put children at risk of abuse, and any concerns about children's safety are reported to the competent authorities.

Safeguarding Incident Investigation Officer/Team: in the context of these procedures, the term "officer/team responsible for safeguarding safety" is used to describe the persons within the "Bună Ziua Copii din România" who is designated for ensuring safety. This can be consisted of Administrators, Directors, Senior Managers and Safeguarding Focal Points. This does not mean that every person is involved in every aspect of ensuring safety. The daily responsibility for ensuring safeguarding systems rests with the operational staff, respectively the person designated as responsible for Safeguarding. The Safety Incident Investigation Team consists of employees from different levels of the organization who collectively ensure the prioritization of safety assurance systems, policies and practices.

Risk indicates the threats related to internal factors (family and personality) and external factors (social environment) occur in combination with existing vulnerabilities, and all of these may worsen the situation of the child and family and create a danger that would require protection action. Risk assessment requires a careful analysis of the entire situation of the child and the family.

Risk situation - any situation, measure or inaction that affects the physical, mental, spiritual, moral or social development of the child, in the family, in the community, or in the organization for a determined period of time.

Request - any information received directly or indirectly, by any means, by telephone, in writing (memoir, address, written material, etc.), by direct presentation (audience, etc.) or by self-reporting to the representatives of the competent service.

The source of the request – can be a person who reveals his identity or is anonymous, or a representative of a public or private institution or organization.

Vulnerability refers to physical, social, economic and environmental factors that increase a child's susceptibility/predisposition to protection issues and other hazards and difficulties. Vulnerability factors could include: lack of parental care, parental disability or migration, poverty, etc.

B. Children's rights

In BZRO, the articles that protect the rights and freedoms of the minor, his dignity and the right to his own image are respected, in accordance with the regulations of Law no. 272 of June 21, 2004 with subsequent amendments and additions regarding the protection and promotion of children's rights, Audiovisual Law no. 504 of July 11, 2002 with subsequent amendments and additions and Decision no. 220 of February 24, 2011 regarding the Audiovisual Content Regulation Code.

BZRO respects the rights of the child, including:

- the right not to be discriminated and to be treated with dignity, regardless of other factors like disabilities, ethnic, religious or political affiliation;
- the right to think and act autonomously, respecting the rights of others, according to personal potential, desires and needs;
- the right to have his image, privacy and confidentiality respected regarding personal data, personal relationships, his living space, his own financial situation and his own assets; exceptions to the rule are recorded in writing, in agreement with the beneficiary or their representatives (confidential information must be authorized by the beneficiary or by his legal representative and is limited to specific necessary information);
- the right to have his cultural and religious backgrounds respected;
- the right to have his physical, sexual and emotional needs respected;
- the right to be involved in the social life as a member of the community;
- the right to be explicitly informed about the goals, reasons and results of the intervention;
- the right to be informed about his rights and responsibilities as a beneficiary of BZRO's services, to participate and be consulted on all decisions related to him (including the right to refuse these services, in certain circumstances established by the service contract);
- the right to make observations and formulate proposals regarding the offer of social services;
- the right to be treated individually, for maximum valorization of personal potential;

- the right to receive responses to requests or expressed opinions;
- the right to a normal social life;
- the right to assistance of any kind and accessibility;

C. Domains

"Bună Ziua Copii din România" (BZRO) has the responsibility to provide protection to all employees/staff and for the members of the communities they work with. Therefore, BZRO has the obligation to respond - in one way or another - to all reported incidents. This policy covers all types of incidents and provides guidance and a framework for the successful resolution of reported incidents. The main goal is to ensure the best outcome for the beneficiary. In cases where a breach of our code of conduct is confirmed, we also have a duty for the person that makes the complaint (the alleged perpetrator).

For "Bună Ziua Copii din România", the purpose of safeguarding is:

- Preventing all forms of harm and reducing the risk of abuse that may occur due to the activity we carry out.
- Developing ways to approach safety that work for the children, families and communities we support.
- Raising awareness within our organization so that both staff and the members of the communities we work with, are involved in preventing, identifying and reporting abuse.
- To achieve these objectives, it is necessary:
 - to ensure that the roles and responsibilities of individuals and of the NGO are clearly defined.
 - to create a strong internal framework of measures to safeguarding.
 - to clarify the interface between safeguarding and quality of the provided services.

The operational procedures for safeguarding are aimed to establish the process that the Team responsible for safeguarding from "Bună Ziua Copii din România" follow in order to respond and manage a reported abuse.

This policy applies to both staff and associates.

Staff includes:

- all staff, national and international
- all volunteers and interns

Associates include:

- all contractors, eg consultants or service providers
- all members of the Board
- all partners, including local community partners
- guests and visitors

Responsibility of BZRO staff in terms of safeguarding:

Duty of Care: all BZRO staff have the obligation to protect the security of the beneficiaries they interact with and of their colleagues. In terms of ensuring safeguarding is that when a complaint is received, BZRO staff investigates whether a member of staff, beneficiaries or community members is experiencing any type of abuse and is related to the activity we carry out.

Zero tolerance: BZRO declares zero tolerance towards sexual harassment, exploitation, abuse, child abuse and other harm forms that can be caused by the activity we carry out. All BZRO staff share the obligation to prevent, report and take responsibility for any type of abuse.

Primary responsibility of the BZRO staff regarding safeguarding:

#	Responsabilitate	Cum sa o realizam?
1	Responsibilities	✓ How to achieve it?
2	All staff should understand the concept of safeguarding and recognize the any form of abuse related safeguarding in the context of the work they carry out. This requires knowing the standards of behavior and ways to support others so that	<ul style="list-style-type: none"> ✓ Read the relevant policies regarding safeguarding, alert/warning procedure, personal data protection and IT security. ✓ The hierarchical manager or HR manager informs BZRO staff about the code of conduct, explains each point and each staff member must sign for taking acknowledge of it. ✓ By participating in safeguarding

	they are not abusive and how they can help reduce or prevent abuse.	<p>training sessions within 3 months of starting the activity.</p> <ul style="list-style-type: none"> ✓ By carrying out regular professional development activities, including discussions in team meetings, with BZRO staff for sustainable strengthening of knowledge of safeguarding.
3	All staff should understand that it is their responsibility to report all safety concerns, complaints or disclosures and to be assured that they will be protected and their anonymity will be kept during the investigation process.	<ul style="list-style-type: none"> ✓ Read the safeguarding policy of the organization where you work. ✓ The hierarchical manager or HR manager informs BZRO staff about the code of conduct, explains each point and each staff member must sign for taking acknowledge of it.
4	All staff should understand how to report an incident, concern, complaint or disclosure of an potential abuse that is caused by a staff member of BZRO	<ul style="list-style-type: none"> ✓ The hierarchical manager or the focal point on safeguarding informs the staff about the methods of response and management of incidents stated in the Operational Procedures for Safeguarding and informs all staff about the key points, procedures and the information flow. ✓ All staff members receive clearly written and easy-to-read materials.

II. Child Safeguarding policy implementation

1. Prevent actions

The protection of children against abuse and the protection of children's rights will be addressed through the following steps:

A. Risk assessment / risk mitigation

"Bună Ziua Copii din România" carries out risk assessment for all operations, programs and project activities. Risk mitigation strategies are developed within the organization to minimize abuse risk on children and are incorporated into the design, delivery and evaluation of programs, operations and activities that involve or impact the lives of children.

B. Safe recruitment

"Bună Ziua Copii din România" uses safe recruitment practices, so as to prevent/avoid people who may endanger the safety of the children in the programs and projects.

Staff, consultants and volunteers will be recruited into posts or roles that clearly include a statement of the position or role responsibilities to meet the requirements of the child safeguarding policy.

All interviews will include a discussion about safeguarding policy, the candidate's understanding of this and the organisation's commitment.

Staff who is into direct contact with children or have access to children's personal information has to bring a references/referrals and a criminal record.

"Bună Ziua Copii din România" applies the highest standards in its recruitment and verification procedures throughout the organization. Candidates tested to see if they are suitable to work with children and on their understanding of child protection and safety.

Safeguarding checks such as criminal record or behavioral compliance record are an important part of our recruitment policy and cover all those representatives with whom we have an employment relationship. If police checks are impossible, other checks are put in place and noted. Verification of proof of identity and authenticity of qualifications, request for self-declarations of previous convictions and a minimum requirement of at least two references are carried out in all cases.

C. Code of Ethics

All staff (including consultants and volunteers) must adhere to the Code of Ethics (annex 1) of the organization. This code also includes acceptable and unacceptable behaviors in relation to children.

Staff working for BZRO must follow this code inside and outside the workplace. This means that they adopt appropriate behavior and report concerns they have about a child, whether they are in or out of the workplace.

D. Education/ Trainings

All staff in BZRO have access to regular child protection trainings, which is appropriate for each one's role and responsibilities, starting from the first stage.

Child protection information is available in the appropriate format and language (Romanian, English or Dutch) to be accessible by all staff, children and parents/carers.

All staff and associates receive child protection training to help them understand why child protection is necessary in the organization's activities and to be fully aware of the procedure for reporting concerns that may arise in their work with children.

Staff will receive a brief introductory child protection training upon joining the organisation. Staff with specific responsibilities related to child protection will receive more in-depth training within 6 months of employment (e.g. specialized staff, or people involved in direct activities with children).

Associates will be informed about the child protection policy and their responsibilities upon assuming its conditions, a mandatory assumption when entering into a collaboration, partnership, employment or volunteering in BZRO.

Children and families will be informed about BZRO's commitment to child protection and what to do if they have problems with a child.

All staff and children know the person designated by the organization as responsible for monitoring the implementation of the child safeguarding policy, who can receive referrals or complaints and provide guidance on risk assessment and mitigation in accordance with BZRO's policies and procedures.

E. Safe programs

"Bună Ziua Copii din România" implements projects and provides safe services for children. In this regard, BZRO develops strategies and work procedures to combat, prevent and assess the risk of abuse and neglect.

- All staff know and implement the requirements of the Procedure regarding the prevention and combating the risk of abuse and neglect, which aims to establish (annex 2), in accordance with the BZRO mission, measures to prevent and protect children against any form of intimidation, discrimination, abuse, neglect, exploitation, inhuman or degrading treatment.
- Staff, as well as associates, partners, communities, families, children and other interested parties involved in BZRO must be aware of the Child Safeguarding Policy and ways in which complaints can be made.
- Children have access to informational materials (leaflets, guides, books, etc.) and activities regarding children's rights and ways to report/complain about acts of intimidation, discrimination, abuse, neglect, exploitation (sexual, through work), inhuman or degrading treatment.

F. Communications - use of images and personal information of children

The entire BZRO staff knows and respects the Policy regarding the protection and security of personal data (appendix 3) whose purpose is to collect only the personal data necessary for the purposes agreed with the Beneficiaries of the association (children, parents and legal representatives) and also communicates personal data only where is strictly necessary and only with their written consent.

All volunteers respect the confidentiality of data regarding children in BZRO programs, a clause stipulated in the volunteer contract signed with BZRO.

In using information and visual images, both photographs and video, our main principle is to maintain respect and dignity in the portrayal of children, families and communities. Our policy / lines of communication are detailed in our working procedure.

H. Social media

"Bună Ziua, Copii din România" as the administrator, owner and author of www.bunaziuacopii.ro, as well as the administrator of several social media pages, respects the privacy and security of the information provided by the beneficiaries when information is provided by them or when they in turn provide information about the organization's activity, in the online environment, through the various forms on the site (site registration form, contact form, volunteer form, donations) or posted articles.

BZRO sets the standards for the use of social networks by employees, volunteers or collaborators through its Social Media Policy (annex 4). In order to avoid harming children of any kind in the implemented programs, all staff must comply with this policy, and in case of non-compliance, disciplinary sanctions will be applied, depending on the violation.

Rules for the use of social media for staff and volunteers:

- The employee writes in his own name and uses the disclaimer
- Uploading or posting defamatory, obscene, abusive or harmful content is prohibited
- Informing responsible staff if another staff member uploads this type of content
- Sharing of sensitive information - a child's name or location or commercially sensitive information is prohibited
- Always respect the website's terms of use
- Staff is responsible for the content they share, and are careful about what they post and share
 - Beneficiaries are encouraged to avoid posting personal information that would determine their identity or by which they could be identified
 - Social media sites are monitored and if staff break the rules, they are subject to the organization's disciplinary procedures
 - Misuse could have serious implications and could break the law, especially with images of child abuse, defamation, harassment and intimidation

I. Responsibilities

The child safeguarding policy is approved by the Board of Directors of "Bună Ziua Copii din România" and by the executive president of the organization, who will ensure the implementation of this policy.

III. Partners

Agreements with partners (schools, public institutions, NGOs, etc.) will include a statement according to which partners who do not have a child safeguarding policy will respect/adhere to the "Bună Ziua Copii din România" policy or will develop their own politics as a condition of partnership.

IV. Reporting/responding to concerns

Staff who have suspicions or identify situations of child abuse, neglect and exploitation within a service, project or activity of BZRO or outside it, have the obligation to report the authorities and notify the service coordinator, the project manager or the executive president of association, following the steps provided for in the BZRO Methodological Guide regarding the intervention and prevention in the multidisciplinary team of situations of child abuse, neglect and exploitation and in accordance with the legislation in force.

Who and how can report abuse?

1. General presentation of reporting methods for BZRO staff, partners and community members: the child protection policy within BZRO reiterates the importance of the existence of beneficiary-centered procedures; as such, a number of options have been established for reporting a referral. The person reporting the concern can choose the reporting channel they feel most comfortable with. At the same time, it is important to find a balance where (i) there are not too many reporting channels available, and (ii) where a report or disclosure is verified by more than one person.
2. Who can submit the form: The person who wants to report a complaint can be assisted by a friend, colleague, family member and can submit the form through a third party.

The person submitting the form can be the parent, their legal representative or a lawyer and can act on their behalf if the beneficiary gives their consent. The information we receive through the form will be the starting point for making further inquiries and deciding on the best course of action to achieve the best outcomes for the individuals involved.

Reporting options for different people:

Who reports	List of reporting channels
Members of the children's community	Directly by verbal or written notification to the focal point
	Writing, anonymous or signed notification submitted in the box specially intended for notifications and complaints existing at one of the organization's headquarters (Bârlad, str. Mihai Eminescu no. 2 or Bârlad, Bld. Epureanu no. 19, Complexul de Servicii Community "Neculai Roșca Codreanu" et.1)
	Writing by email departamentprograme@bunaziuacopii.ro
Adult community members and other program stakeholders	Directly by verbal or written notification to the focal point
	Writing, anonymous or signed notification submitted in the box specially intended for notifications and complaints existing at one of the organization's headquarters (Bârlad, str. Mihai Eminescu no. 2 or Bârlad, Bld. Epureanu no. 19, Complexul de Servicii Community "Neculai Roșca Codreanu" et.1)
	Writing by email departamentprograme@bunaziuacopii.ro
Personalul din cadrul organizației	Directly by verbal or written notification to the focal point
	Writing, anonymous or signed notification submitted in the box specially intended for notifications and complaints existing at one of the organization's headquarters (Bârlad, str. Mihai Eminescu no. 2 or Bârlad, Bld. Epureanu no. 19, Complexul de Servicii Community "Neculai Roșca Codreanu" et.1)
	Writing by email departamentprograme@bunaziuacopii.ro

Warning/alert (whistle blowing):

- BZRO and its partners have a child protection/safety policy in place that includes warning/alert as a method that protects and supports staff who report a concern,
- The warning/alert procedure removes fears of possible repercussions and protects the reporting person.

- Any warning that proves to have been made with bad intent represents an abuse of the code of conduct and the zero tolerance statement in terms of guaranteeing safety within (organization name).

3. Community members and service beneficiaries reporting a concern: There is a Feedback, Complaints and Response (MFRR) mechanism for all programs run by BZRO. Safety considerations are integrated into this mechanism and therefore there are various channels through which beneficiaries and other community members can report a concern/report.
4. Staff Reporting of Safety Concerns: Staff members can report a concern directly to the focal point or Safety Assurance Team. If staff do not feel comfortable informing the Safety Assurance Team, they should report to the highest level of management they feel they have confidence in.
5. Reporting a safety incident by a partner: Any partner working within a BZRO program can raise a concern about an abuse caused within our activity. They should submit the report in accordance with the incident reporting procedures of the organization they work for. Once a partner's safety assurance officer has received the cause of concern, they should immediately report it to the safety focal point/team within the BZRO. If the partner's staff do not feel comfortable with any of the options offered within their own organization, they can report directly to the Executive Director within the BZRO.
6. Informal channels for reporting a suspicion: although informal reporting is not an option for formal reporting, it does exist. Sometimes staff, community members, partner staff may raise a concern in a discussion, for example during a monitoring visit or observation session. Disclosure may be unintentional, as the community member may not consider the behavior to be incorrect. In such situations, the staff member who received the informal report should note it down and forward it through the reporting mechanisms listed above.

7. Responsibilities of the person who reports a reason for concern/suspicion

- the person reporting a cause for concern must comply with the policy and procedures BZRO for guaranteeing fuses.
- respect the opinions of the beneficiaries.
- must decide whether immediate protection is required and clearly state this to the person to whom the referral is made

- consider whether to retain evidence.
- consider whether there are good reasons to act even without consent of the beneficiary.

The format and content of a reason for concern / suspicions

1. Format: a concern can be communicated in person, verbally, or over the phone, via SMS, email, or a handwritten note, etc. However, in order to formally record the incident and initiate a response, the report must be submitted in writing using a safety assurance incident report form that BZRO may make available.

2. What you must tell us: a notification must include the following information and a reason of concern, we need to know the following information:

WHO:

- details about the beneficiary (if there is his consent) - anonymous reporting is also encouraged. If a name is received, it will be removed from further documentation and communicated only as necessary.
- the name / details of the alleged author(s).
- the contact details of the person who reported the concern in order to find out more information along the way.
- details about witnesses

WHAT: a brief description of the cause of concern

WHERE: the place of the incident

WHEN: the time / moment of the incident.

Additional information: it is important to be able to remember the situation in detail in order to be able

to share later. A person raising a concern should record in writing any information that may be needed later - including license plate numbers, street names, names on ID cards, etc. This information may be included in the initial report that you will not be able to remember, such as a phone number.

Consideration of gaps and incomplete information: It is important to be aware that no report will be perfect, that there will be inconsistencies or gaps, and that further monitoring or research

/ investigation is likely to be required as part of case management procedures (to be carried out only by specific persons, designated and trained in this regard).

Risk to those involved: In some cases, we may need to take immediate action. A concern should only be raised after the immediate risks to the beneficiary/reporter have been resolved.

Remember:

- ⇒ concrete evidence of an incident is not needed for a complaint to be officially registered.
- ⇒ all BZRO staff and associated staff are required to report any real concerns they may have, whether or not they have evidence.
- ⇒ failure to report may endanger another person or adversely affect the organization.
- ⇒ no investigation is carried out on your own, this could compromise the outcome of the case.

Consent, Privacy and Information Sharing

1. Informed consent for children – informed consent must be obtained from the parent or guardian/legal representative in order to share information about a concern about a child. All decisions made with and for children should be made with their best interests in mind. Parents or guardians are usually the people responsible for giving consent for their child to receive services until the child turns 18. However, decisions to involve parents or carers should be made with the child.
2. An adult's informed consent means that an adult, who is informed and able to understand a problem and its implications, agrees to share a concern about abuse.
3. Confidentiality is an ethical principle that restricts access to information and its dissemination when this information, if accessed or shared in a way inappropriate, could cause harm (physical, psychological, sexual, etc.) either to the person who made the report, or to the person(s) who is (are) the subject of the feedback.¹
4. "The need to know". Maintaining confidentiality requires that the exchange of information related to the reporting of an incident is carried out in compliance with the

¹ ¹ Text adaptat după CHF Alliance PSEA Quick Reference Handbook, 2017, as quoted in CARE UK (2020), *FAM Guidance*.

"need to know" principle. The term "need to know" requires the limitation of information considered sensitive or identifying and involves sharing it only when necessary, with those people who need it to protect the victim of a report, suspicion or warning of abuse.² In order to preserve confidentiality and uphold BZRO's personal data protection policy, the requirements listed below must be followed at all times throughout safeguarding case management procedures.

- i. Share sensitive or identifying information only as necessary (for example, name, location and details of an incident). Try to share this information with as few people as possible and only with the consent of the survivor or whistleblower.
 - ii. Name information is only required for the person receiving the initial report and the employee liaising with the survivor/whistleblower and should not be shared with all members of the Safety Team.
 - iii. Be careful not to disclose sensitive information or identifying details to colleagues who ask or show interest in that activity.
 - iv. All whistleblowers must ensure that they have the consent of the reporting person/beneficiary to forward the whistleblower to the designated safety focal point/team.
 - v. All information related to individual reports is collected and stored in a secure database, separate from other non-sensitive reports and in accordance with BZRO's data protection policy and procedures.
5. Breach of confidentiality is possible only in case of two scenarios presented below. Breach of confidentiality decisions should be made with the support of experienced security professionals and/or governing bodies/managers.

Scenario 1: if there is an imminent and significant danger of injury/damage to the life of the victim or other persons; and/or

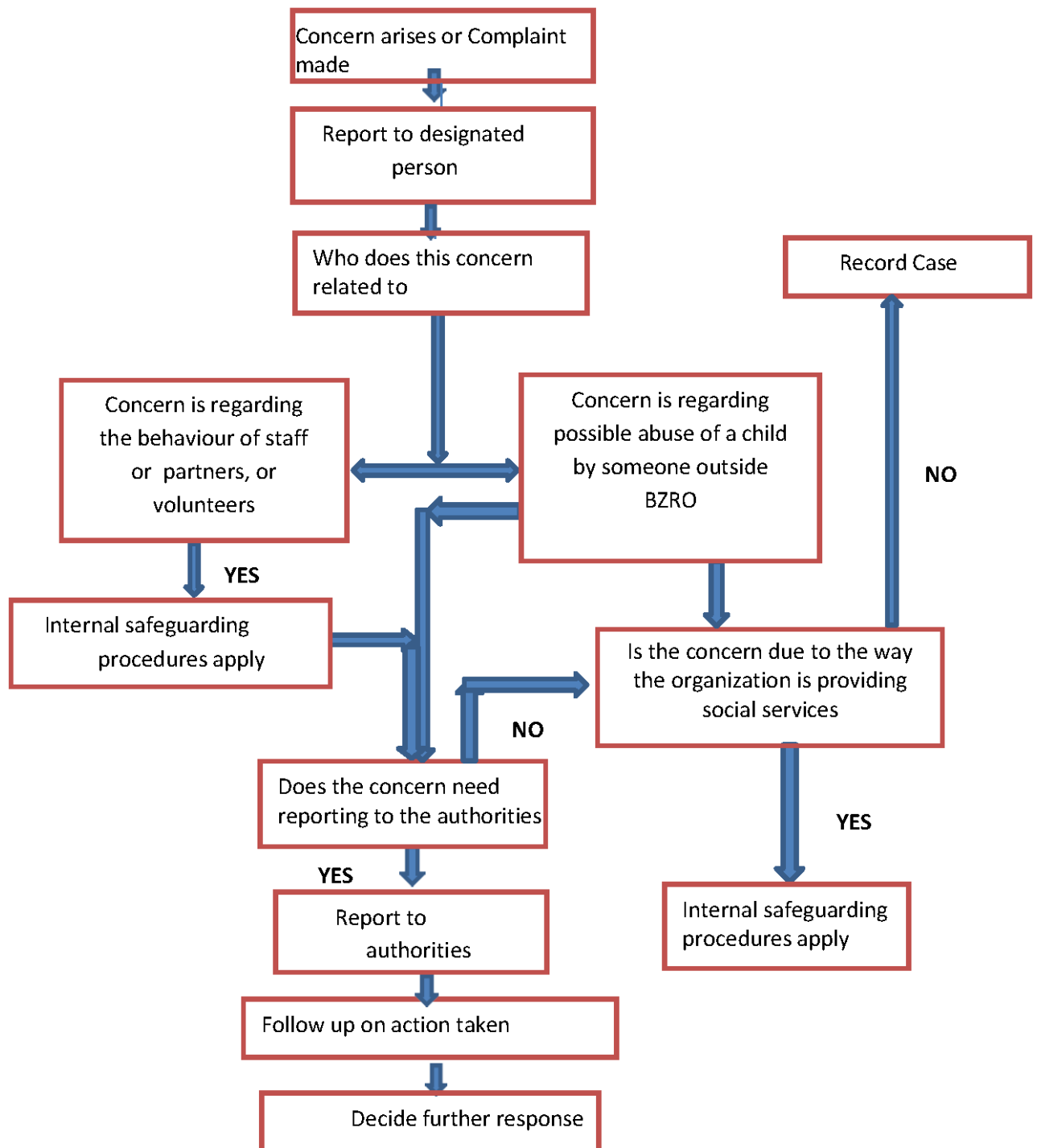
Scenario 2: Where the victim is found to lack the capacity to consent due to some cognitive disability (or other similar reason) or where they have suffered significant trauma and would be considered incapable of make a rational decision.

² Text adaptat după Protection Cluster (2014) *Inter Agency Guidelines for Case Management & Child Protection*, http://www.cpcnetwork.org/wp-content/uploads/2014/08/CM_guidelines_ENG_.pdf

6. Confidentiality and Information Sharing - Internally: All staff members are required to follow the same privacy and information sharing policies. Based on reasonable judgment, the privacy policies do not prevent us from seeking advice, support and guidance from other staff members. This is important if we believe that their contribution would be beneficial to the beneficiary. Referrals from other staff members are kept on record.
7. Confidentiality and Information Sharing - External: Information is shared with consent, if applicable, and where possible, the wishes of those who do not consent to share confidential information are respected. All information sharing decisions are planned, agreed and recorded as part of the case management process and in accordance with legal and criminal requirements.
8. Personal data protection and confidentiality: in accordance with the BZRO personal data protection policy, employees, contractors, suppliers, volunteers and administrative staff have the following responsibilities:
 - will ensure that all personal data is collected correctly and legally.
 - they will explain from the beginning why data collection is necessary.
 - they will ensure that only necessary data are collected and used.
 - will ensure that the data used is up-to-date and accurate.
 - they will review the length of time the data is kept.
 - they will ensure safe data storage; and make sure that your people can exercise the rights they have regarding their personal data:

All notification forms received are stored in digital format in a dedicated file for each individual case. The staff receives training on how to use the data.

Steps to follow to report a case of abuse in the BZRO :



BZRO treats any suspicion, report or allegation of child abuse seriously and confidentially, without exception, in all programs, and gives a prompt and fair response in accordance with the seriousness of the allegations.

”Bună Ziua Copii din România” Association will receive disclosures from children with sensitivity and will strive not to re-traumatise children in their handling of complaints. If a child or young person tells you they are being, or have been, abused:

- Listen to and accept what the child or young person says but do not press for information.
- Let the child or young person know what you are going to do next and that you will let them know what happens.
- Do not investigate and do not inform, question or confront the alleged abuser.
- Take the alleged abuse seriously.
- Record carefully what you have heard on the reporting form.

The priority will always be the safety and best interests of the child.

Identifying information about children will be shared on a ‘need to know’ basis only. Any staff who raises serious concerns about a colleague's incompetence or malpractice will be protected, as far as possible, from victimization or any other harmful treatment if they present serious problems, provided the concerns are raised in good faith . Deliberately false allegations are a serious disciplinary offense and will be investigated.

The subject of the complaint (alleged perpetrator) and all witnesses must cooperate fully and openly with internal and statutory investigations and hearings. Their confidentiality will be protected and information which could identify them will be shared on a ‘need to know’ basis only.

Violation of the Code of Ethics, the Work Procedure regarding the intervention and prevention in the multidisciplinary team of situations of abuse, neglect and exploitation of the child or non-compliance with the Policy for the protection of the child, applicable in the organization, will lead to the application of disciplinary sanctions or the notification of the authorities, as the case may be. This decision will be made on a case-by-case basis in order to comply with the terms of employment and the law, while maintaining the confidentiality of those affected during an internal investigation.

When a child safeguarding concern is brought to your attention – ACT

Act on your concerns. If in doubt, speak out!

Child-centred. The protection of children is the most important consideration.

Time counts. Ensure timely, effective, confidential and appropriate responses to child safeguarding issues.³

A prompt and appropriate response will ensure that the situation is not perpetuated and that everyone involved is clear about the issues and the actions that need to be taken.

Allegations against a staff member would normally result in the employee's immediate suspension pending investigation/investigation. If the allegation is a criminal matter, it must be reported to the authorities before taking action or informing the alleged perpetrator.

Internal investigations are carried out by a person with such skills. The investigation includes interviews of all parties involved, including witnesses to gather all relevant details of the allegation.

If it is found that the statement is true, appropriate disciplinary measures are taken which may also lead to the termination of the employment contract, the volunteering contract or any type of collaboration with the person in question. If the allegation is found to be unfounded, appropriate steps are taken to minimize damage to the reputation of the accused employee/person.

Internal investigations related to allegations of criminal behavior are discussed with the authorities before any internal action is initiated so that the organization does not compromise the formal investigation.

BZRO provides information, support and advice to all those involved in the report and response.

³ From Plan International, Child Protection Policy "Reporting and Responding to Child Protection Issues in Plan".

The organization has a list of institutions, organizations and professionals who can be quickly contacted to support reporting and responding to concerns (annex 5).

V. Monitoring and review

Regular monitoring of risks, risk mitigation and the effectiveness of the child safeguarding measures are incorporated into Bună Ziua Copii din România monitoring processes and activities. The policy is reviewed every 3 years.

Child safeguarding is incorporated into the BZRO's risk register and quarterly and annual reporting processes. The organization's management and the Board are regularly review the risk register and organization reports to ensure that child safeguarding measures are in place and effective.

This policy will be reviewed at minimum of every 3 years or when it is shown necessary that additional issues need to be identified and addressed through this policy.