



SAFEGUARDING POLICY FOR THE PROTECTION OF BENEFICIARIES



BUCHAREST, 2021

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1. Introduction

The FARA Foundation is a non-governmental organization that was founded, 30 years ago with the mission of transforming the lives of the most vulnerable and disadvantaged children, young people, and families from poor communities in Romania. The name of the foundation draws attention to the difficulties they encounter: no family, no parental love, no resources and support, no equal opportunities for education and opportunities, no hope and no privacy, no smiles.

Our mission is to transform the lives of the most vulnerable and disadvantaged categories of children, young people and families living in the poorest communities in Romania. The FARA Foundation aims to be a family FOR those without. To this end, through the schedules, projects, and actions we carry out:

1. We serve the poorest families.
2. We care for children, young people, and adults with disabilities.
3. We support children, young people, and adults with or without a family and those abandoned.
4. We raise resilient and resilient children and young people.
5. We build solid and functional families and involved communities.
6. We offer love, hope and safety to those we serve.
7. We help heal trauma of abuse caused by and neglect.
8. We demonstrated that we invest in those who need support the most.
9. We contribute to the fulfillment of lives, the reconstruction of the future, and the spread of hope.
10. We help each of our beneficiaries find answers and resources to take their lives into their own hands.

1. Definition

The policy for the protection of beneficiaries shall include definitions, standards, measures, procedures, and elements of good practice which identify the expectations, actions and interventions necessary to promote and protect the rights of beneficiaries, as well as the prevention and/or minimisation of risk which may endanger their safety, safety, dignity and well-being.

The protection of beneficiaries shall be defined within individual and collective responsibility for the prevention of abuse and exploitation of vulnerable persons, for public awareness in this regard, and for monitoring and evaluation of solutions and the timeliness of interventions to resolve risks.

1. Purpose

The beneficiary protection policy aims to ensure a development environment in which vulnerable children, young people, families and communities, regardless of their abilities and membership, can live in safety and dignity, are sold with respect, acceptance and love, helped to reach their potential in the spirit of equity, social inclusion, tradition, faith, hope and trust for the future, and support to take responsibility for fending ways out of poverty and improving their lives.

1. Objectives

The main objectives are:

1. Protect all categories of beneficiaries participating in FARA programs.
2. Ensure the need for information to respect the rights and obligations of beneficiaries and the implementation of professional standards and ethics for the protection of beneficiaries.
3. Ensure the information need for the recognition and reporting of worrying problems or signs that may harm beneficiaries, their safety and security.
4. To help prevent and fight inappropriate behavior.
5. To provide staff, volunteers, collaborators, and supporters of the FARA Foundation with the framework for carrying out their activities, including for beneficiaries.
6. Develop measures, procedures and working tools to implement national and international principles and standards on the protection of beneficiaries to quality and cost-effectiveness standards and to achieve the expected impact.

1. Beneficiaries

The FARA Foundation provides support for vulnerable children, young people and adults and their families living in Ilfov, Suceava, and Satu Mare counties. Our beneficiaries has:

1. Children and adolescents from poor families at risk of dropping out of school.
2. Children, young people, and adults with disabilities in the community.
3. Children deprived of parental love with social protection measure.
4. Vulnerable young people facing homelessness.
5. Young people leaving the protection system in transition to independent living.
6. Young people and adults with disabilities from state institutions
7. Poor and marginalized families and communities
8. Professionals and organisations in relevant fields (education, health, social, community development, etc.)

The FARA Foundation shall be based on the definitions laid down in the relevant legislation relating to the categories of direct beneficiaries it serves:

1. *Child* - the person who has not reached the age of 18 and has not acquired the full capacity to exercise.

2. *Child in the protection system* - a child who has not reached the age of 18 for whose State establishments a special protection measure because he is deprived, temporarily or permanently of the protection of his parents or of another legal member who assumes responsibility for the protection of his interests.
3. *Young man at risk or who has left the protection system* - any vulnerable young person between the ages of 18 and 26 who is in some form of education or not, when he or not he has a job or not, and makes difficulties limiting his ability to live independently (e.g. homeless, relationship problems, no membership of a social support system, low educational level, no trust in people, vulnerable to group pressure, affected by poverty, childhood trauma and/or life in institutions, etc.).
4. *Person with disabilities (child, young person, adult)* - the person whose social environment not adapted to physical, sensory, mental, mental and/or associated deficiencies prevents him or her totally or partially from accessing resources and opportunities for equal opportunities for development and participation in society, and who require protective measures in support of social integration and inclusion.
 1. *Family* - their parents and children.
 2. *Extended family* - relatives of the child, up to and including grades IV.
 3. *Substitute family* – persons other than those belonging to the extended family, including grandparents up to grade IV and foster cares who provide childcare and care, under the law.
 4. *Poverty* – is a complex and multidimensional phenomenon that manifests itself in small forms (living and living conditions, income, employment, social acceptance, access to educational, professional, development and social justice opportunities) and affects individuals of all ages, as well as groups (families and communities) and exposes them to the risk of social exclusion.

1. Synergies

The beneficiary protection policy is the committee and concern of the FARA Foundation to understand all conditions on a permanent basis for the physical, mental and emotional security and safety of children, young people, families, employees, partners and collaborators in the process of implementing programs and providing services. This policy aligns with the mission, vision, values, principles, and strategic directions of the FARA Foundation and is closely related to other policies of the organization such as:

1. Policy for the use of technology equipment and management of electronic information and communication (ICT policy).
2. GDPR Procedures (GDPR Policy).
3. Procedures regarding the consent of beneficiaries for photographing, filming and using them for different aims and through different media channels (PhotoPolicy/Video).
4. Policy on the prevention of infection and spread of the Sars-Cov-2 virus including vaccination policy (COVID Policy 19).

The national and international legal framework on the promotion and respect of human rights and freedoms, especially of children, young people and persons with disabilities, information and regulates the policy for the protection of beneficiaries of the FARA Foundation.

1. International Law

| Central theme | Legislative landmark |
|--|---|
| Human and Child Rights | Convention for the Protection of Human Rights and Fundamental Freedoms (1950), updated (2014) |
| | United Nations Convention on the Rights of the Child (1989) |
| Abuse and Sexual Exploitation | College of Europe Convention for the Protection of Children from Sexual Exploitation and Sexual Abuse*) Lanzarote (2007) |
| | Directive 2011/93/EU of the European Parliament and of the Council on combating sexual abuse, sexual exploitation of children and child pornography and replacing Council Framework Decision 2004/68/JHA (2011) |
| | United Nations Declaration on the Elimination of Sexual Abuse and Exploitation (2017) |
| Alternatives Care | A Guidelines on Alternative Child Care (2010) |
| People with Disabilities | UN Convention on the Protection of Persons with Disabilities (2007) |
| Eradicating Poverty | UN General Assembly, Resolution A/64/133 (2009) Eradication of Poverty, Valorization and Participation of poor people |
| | UN General Assembly, Resolution A/RES/72/233 (2018) Third Decade for the Eradication of Poverty (2018–2027) |
| Rights, support and protection of victims of crime | European Parliament resolution on the implementation of Directive 2012/29/EU taking down minimum rules on rights, supporting protection of victims of crime (2016/2328(INI) , 2018) |
| | UN Economic and Social Council, Commission for the Prevention of Crime and Criminal Justice, Combating Sexual Exploitation of Children and Sexual Abuse of Children Online, E/CN.15/2019/L.3/Rev (2019) |

1.1 National legislation

| Central theme | Legislative landmark |
|--|---|
| Human and Child Rights | Constitution of Romania (2003) |
| | National Education Act No. 1/2011 (updated 2020) |
| | Law No 95/2006 on updated health reform |
| | Law No 202/2002 on equal opportunities and treatment between women and men, updated (2013) |
| | Law No. 45 of 3 April 2020 for the amendment and completion of Law No. 272/2004 on the protection and promotion of the rights of the child |
| | Child Protection Standards as presented by the Coalition for the Maintenance of Child Safety (2014) |
| People with Disabilities | Law No. 221/2010 for the ratification of the Convention on the Rights of Persons with Disabilities |
| | Law No. 448/2006 on the protection and promotion of the rights of persons with disabilities, republished and updated in 2020 by: Order 546/2019 for the establishment of models of conventions on the transport of persons with disabilities; Order 124/2019 for the establishment of models of conventions on the transport of persons with disabilities; OUG 9/2019 for the amendment and completion of Law No. Article 61/1993 on the State allowance for children and on the amendment of Article 58(1) of Regulation (EC) No 1493/1999. (1) of Law No 1/2002 of the European Parliament and of the Council of 22 448/2006 on the protection and promotion of the rights of persons with disabilities |
| | Decision amending and supplementing the Methodological Rules for the application of the provisions of Law No. 448/2006 on the protection and promotion of the rights of persons with disabilities, approved by Government Decision No 448/2006 on the protection and promotion of the rights of persons with disabilities. 268/2007 |
| Eradicating Poverty | Law No. 116/ 2002 on the prevention and combating of social marginalisation, as updated by Law No. 250/2013 and Government Decision No. 119/2014 |
| | Law No. 231 for the completion of the Social Assistance Act No. 292/2011 |
| Protection of victims of domestic violence | Law No. 30/2016 on the ratification of the Presidency of Europe Convention on the Prevention and Combating of Violence against Women and Domestic Violence, adopted in Istanbul in 2011 |
| | Law No. 183/2020 on the amendment of Law No. 217/2003 on the prevention and combating of domestic violence |

1. Principles and Values

The principles and values guiding the protection policy of beneficiaries are:

| Values | Principles |
|---------------------------------|--|
| Equity | All beneficiaries have equal rights regardless of their abilities and membership. |
| Involvement | We give a strong voice to our beneficiaries and evolve them in decision-making. |
| Prioritization | In all interventions and programs carried out, the best interests of the beneficiary shall prevail. |
| Empathy | We act with altruism and compassion given that the deeper need of children and young people is to experience genuine love. |
| Sustainability | We offer a stable family environment that provides safety and development opportunities in spiritual, social and material needs are generously nurtured. |
| Diversity | We promote the diversity and freedom of expression of every child, young and adult. |
| Innovation | We stimulated individual creativity. |
| Inclusion social | We support beneficiaries to gain knowledge and develop the need skills to help them with social inclusion. |
| Resilience | We build resilience at the individual level for the disused assumption of responsibility for our own life. |
| Simplicity | We run programs to serve beneficiaries with the most practical and simple ways of intervention. |
| Co-creation Solutions | We evolve as many children as possible, young people, adults and vulnerable communities to be part of the transformation of their own lives. |
| Vluing Individually | We value the experience and potential of each individual to build fully lives. |
| Partnership | We work together in responsible in all sectors Society. |
| Professionalism and team spirit | We value the professionalism, creativity and innovation of the entire team to cover the needs of the most vulnerable and access to the services they need. |
| Credibility | We build the trust of beneficiaries, partners, supporters and communities in our interventions. |
| Accountability | Each employee and collaborator of the FARA Foundation has the responsibility to support and ensure the assistance and protection of beneficiaries. |
| Performance | We demonstrated professionalism, responsibility and generated good practices. |
| Integration and | The legislation, standards, protocols, conventions, and best |

| | |
|---------|---|
| Harmony | practices identified at national and international level form the basis of the content of the policy of protection of the beneficiaries of the FARA Foundation. |
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These values and principles formed the basics for the drafting of the code of conduct in working with beneficiaries within the FARA Foundation set out in **Annex No. 1**.

1. Priorities

Children, young people and vulnerable people may be victims of neglect, abuse and other forms of exploitation. The FARA Foundation has a zero-tolerance policy towards any form of abuse and neglect.

The FARA Foundation focuses all its effort, energy, skills, expertise and resources to prevent abuse and neglect, to correct and promptly stop inappropriate behavior, and to promote the physical, mental, spiritual, emotional and mental security and security of all beneficiaries regardless of gender, race, colour, language, religion, political or other views, nationality or social or social or, membership of a national minority, wealth, birth, sexual orientation, health status, existence of a disability or any other situation. The FARA Foundation shall consider the following definitions:

Physical, emotional, psychological, sexual and economic abuse- any voluntary action of a person who is in a relationship of responsibility, trust or authority towards the beneficiary, through which life, physical, mental, spiritual, moral or social development, bodily integrity, physical or mental health are ended.

Neglect - the voluntary or involuntary omission of a person who has the responsibility of raising, caring for or educating beneficiaries to take any measure that the fulfilment of this responsibility entails, which endings life, physical, mental, spiritual, moral, or social development, bodily integrity, physical or mental health.

Neglect can take many forms: food, clothing, hygienic neglect, medical neglect, educational neglect, emotional neglect, or child abandonment/family abandonment, which is the most serious form of child neglect.

In our view, every employee, volunteer, collaborator, partner and supporter has a duty to protect from any form of abuse and neglect every individual who participates in or contributes to the implementation of the FARA Foundation programs, especially every vulnerable person who is a beneficiary of these programs. This is reflected in the mission, vision, principles, and values of the FARA Foundation as well as in other strategic documents governing the organization and functioning of the organization.

The development, implementation, monitoring and evaluation of all activities that have as their priority the protection of beneficiaries, as well as the reporting and correction of any problems, are tasks, especially the responsibility of the organization's Board of Directors, the leadership and executive management team (Executive Director and Associate Director) and the operational management teams (Program Director, Manager, Assist and Manager).

The priority directions for action for the protection of beneficiaries are aligned with the provisions of the legislation in force for the protection of the child, young people, persons with disabilities, and the family to combat poverty and social exclusion and say consider:

1. Promotion and protection of rights
2. Protection against any form of abuse and neglect
3. Preventing any barriers to harmonious development and physical, mental, emotional, spiritual, and mental health
4. Compliance with all quality standards in the provision of services
5. Achieve strategic objectives to ensure achievement of the expected impact and results.
6. Stimulating and supporting collaboration between professionals and organisations to prevent and stop any risk or form of abuse and neglect.
7. Involvement of beneficiaries in decision-making concern their lives and well-being
8. Consideration of diversity of opinion, wishes, feelings, beliefs, and fears of beneficiaries regardless of age, skills and sleeping.

1. Abusive Behavior

1. Types of abuse

In the literature and in the studies done over time, several types of abuse are highlighted, the forms of which may be the following:

Physical abuse: corporal punishment - pulled by the hair, pushed, bitten, kicked, punched, kicked, jerked, causing burns, forced feeding, starvation, forced restriction of mobility (e.g. binding to the flesh); creating intentional discomfort (in cold or too high heat); forced isolation (closing in the room, including sending to a corner of shame); incorrect use of drug treatment (excessive treatment).

Psychological/emotional abuse: forced social isolation (preventing following friends, accessing services such as school, doctor, socializing); limiting or reducing access to communication routes (confiscating of telephone); ignoring needs; preventing the practice of one's own religion, culture and tradition; ignoring or prohibiting the expression of one's own opinions; preventing self-decision; non-compliance with privacy; prohibition of recreational practice; intimidation, humiliation, harassment, swearing and threat, verbal abuse; fear with the possibility of abandonment, physical aggression; online-virtual aggression; creating a sense of inferiority.

Sexual abuse: rape, attempted rape, sexual assault, inappropriate physical harm, indecent exposure, sexual activities for which the person does not have the mental capacity to provide an adequacy response, pornography, voyeurism.

Financial/material abuse: theft of money and/or personal property; fraud, deception, preventing access to money, personal property; exploitation/use of other persons' property without permission; employing people from beneficiaries; improv management of

beneficiaries' personal income; failure to provide financial advice, support for the beneficiary to manage his financial situation in an optimal manner, access financial benefits, use of accounts, cards, financial documents; provision of non-compliant services; excessive pricing; non-compliant use of authority (guardian, cleanliness); moving into rent by coercive or without complying with pre determined financial conditions; undue pressure; coercive, threat or undue influence on the person in connection with loans, wills, property, inheritance or financial transactions.

Institutional/organizational abuse: discouraging visits involving relative or friends; degraded or over-crowded housing; authoritarian management or rigid regimes; lack of leadership and supervision; insufficient staff or increased rotation leading to poor quality care; abuse and disrespectful attitudes towards beneficiaries; improve use of safety systems; lack of respect for dignity and privacy; failure to manage residents with abusive behavior; failure to provide adequate food and drink or assistance; lack of promotion of independence; misuse of drug treatments; disregard for the cultural, religious needs of beneficiaries; interference in correspondence and personal relationships; failure to promote complaints and failures; failure to complete with minimum standards of legal functioning.

Neglect: lack of facility of access to food, shelter, clothing, heating, stimulation and activity, personal or medical care; provision of care in a way that the beneficiary does not like; administration of non-prescription medicines; refuse of access to visiting; ignoring or isolating the person; preventing the person from making his own decisions; preventing access to glasses, hearing aids, dentures; non-compliance with confidentiality and dignity.

Neglect: lack of facility of access to food, shelter, clothing, heating, stimulation and activity, personal or medical care; provision of care in a way that the beneficiary does not like; administration of non-prescription medicines; refuse of access to visiting; ignoring or isolating the person; preventing the person from making his own decisions; preventing access to glasses, hearing aids, dentures; non-compliance with confidentiality and dignity.

Discrimination abuse: unequal treatment based on age, sex, disability, marriage/civil partnership, pregnancy and motherhood, race, religion and faith, and sexual orientation.

According to Law 202/2002 on Gender Equality this type of abuse may include verbal abuse, derogatory observations or improved use of language related to a feature mentioned above, of access to the means of communication, failure to allow access to an interpreter, signory or lip reader, deliberate harassment or exclusion on the basics of a characteristically mentioned, denial of basic rights to healthcare, education, employment and criminal justice relating to a characteristic, provision of services below the standards regulated by law.

Modern slavery: human trafficking, forced labour, domestic servitude, sexual exploitation such as escort, prostitution and pornography, debt bondage – people forced to work to pay off debts.

Different types of abuse behavior are detailed in **Annex No. 2** to serve as supporting material.

1. Suspicion of Inappropriate Behavior

A number of manifestations may lead to suspicion of inappropriate behaviour on beneficiaries, and includes locations in which the beneficiary:

1. does not want to talk about an injury;
2. provides an unsatisfactory explanation;
3. make a disclosure;
4. has a number of unexplained wounds;
5. becomes drawn or isolated;
6. shows a state of fear to go home/place where the unwanted situation take place;
7. has oscillating mood and unstable behavior;
1. have low self-esteem and feelings of guilt;
2. manifest sexualized or aggressive behavior;
3. has exacerbated states of stress and anxiety;
4. has a tendency to abuse substances;
5. other types of self-harmful behaviors.

Other locations that may have been able to suspect of inappropriate behavior are:

1. the explanation of the parent/guardian in contrast to the mental and physical state of the beneficiary.
2. the explanation of the parent/guardian which is not consistent with the age and stage of development of the beneficiary.
3. repetition of signs of neglect over a period of time.
4. persistence of signs of injury (injury, injury, etc.).

In **Annex No. 3**, the most common signs of possible abuse are listed.

1. Consequences of Neglect

Abuse has a great influence, sometimes devastating on the child's cognitive development, but also on the child's interaction with those around him, which are minors or adults, whether or not they represent an authority on the child. In Romania, abused children often have certain negative influences on behaviour towards those around them (Rădulescu, 2010).

Psychological consequences are encountered in social, economic, physical and sexual abuse. A neglected child may show a lower mental development correlated with chronic age, but also physical signs. The effects of inappropriate behaviour (including abuse) on beneficiaries are far-reaching and long-term. They may take the following forms:

1. mental and physical injury,
2. educational and emotional failure, and
3. criminal or deviant behavior.

Annex **No 4** includes a detailed list of the consequences of the different types of abuse.

1. Prevent

The protection policy for beneficiaries applies to all staff members, board members, volunteers and collaborators, experts, and service providers under service contracts. The FARA Foundation say consider the following directions of action to prevent inappropriate behavior:

1. Development and implementation of policies, procedures, regulations, codex of conduct, good practice guidelines to ensure the promotion and respect of beneficiaries' rights.
2. Ensuring the human, financial, material, informational, and technical resources need to carry out activities with and for beneficiaries.
3. Training and awareness of persons involved in the provision of social services on the rights and responsibilities of beneficiaries, forms of inappropriate behaviour towards beneficiaries, issues related to the protection of beneficiaries, prevention of risks and accidents.
4. Informing and raising awareness of their rights and responsibilities, issues related to their protection, and about human resources within the FARA Foundation to which they can call for support if: they are concerned, are in difficulty, and suffer the consequences of inappropriate behavior.
5. Monitoring and evaluation of staff and activities carried out with the aim of preventing inadequate behaviour and correcting deviations from policies/procedures/ regulations, codes of conduct, good practice guidelines.
6. Adoption of measures to permanently improve the activities carried out.

Actions to prevent inappropriate behavior are intended to:

1. maintain a development-friendly living environment in which children, young people and adults feel protected, safe and encouraged to listen to and be listened to.
2. ensure the protection, assistance and care of beneficiaries as priorities.
3. provide efficient and quality services that demonstrate that beneficiaries are supported and well cared for.
4. ensure that all employees are trained on all aspects of the beneficiaries' protection policy and know how to act, according to it.

1. Responsibilities

All employees of the FARA Foundation, at any hierarchic level (management and execution staff), have a duty to create and maintain a security environment, centred on the protection and care of the beneficiaries of the FARA Foundation so that:

1. provide them with a safe environment and protect them from inappropriate behaviour (e.g. neglect, sexual abuse, physical abuse and emotional abuse).
2. treat them with dignity and respect at all times, respecting their rights.
3. take appropriate measures to ensure the safety and well-being of beneficiaries in accordance with minimum standards for the operation of programmes.

4. ensure that confidential information about beneficiaries is transmitted only when it is in their interest.
5. ensure the transmission of personal information in compliance with the confidentiality rules and in accordance with the provisions of the legislation in force and obtaining consent from parents/guardians or directly from beneficiaries where possible.
6. ensure that the information is used in good faith without causing intimidation, humiliation of a beneficiary.
7. demonstrated integrity, maturity, appropriate behaviour, good judgment in all activities carried out with beneficiaries.
8. provide information and support for parents/guardians and other caregivers to have a clear understanding of legal responsibilities with regard to the safety and protection of all beneficiaries.
9. identify, report and respond appropriate to discharges/referrals received about inappropriate behaviour.

Risk assessment in the context of the protection of beneficiaries at all levels (security, safety, well-being, health, participation, equity, integration, non-discrimination, confidentiality, involvement in decision-making) is a key activity at every stage in the implementation of programs and the provision of services. Responsibility for the implementation of the beneficiary protection policy is a common responsibility assumed by each employee as follows:

| Responsible | Tasks |
|---|--|
| Board of Directors | <ol style="list-style-type: none"> 1. Approvals the revised and updated beneficiary protection policy to reflect legislative and strategic changes 2. Regular monitors progress and challenges in implementing beneficiaries' protection policy <ul style="list-style-type: none"> • Sensitive issues and find solutions with the Executive Leadership Team (DA,DE) |
| Complementary leadership team – Executive (DA and DE) | <ol style="list-style-type: none"> 1. Review of the official lymat protection policy for beneficiaries for updating by integrating legislative and strategic changes <ul style="list-style-type: none"> • Regular monitors progress and challenges in implementation policy to protect beneficiaries <ol style="list-style-type: none"> 1. Sensitive discussions and solutions with the operational management team (DP, managers, consultants) 2. Analyzes specific case that require resolution and solutions proposed by the DP to resolve the situation identified in the current activity. 3. Identify the optimal solution, the implementation decision and forward it to the operational management team for implementation. 4. Each year, it plans and organizes training and information care sessies for each program team regarding the protection policy of beneficiaries. |

| | | |
|---|--|--|
| | <ul style="list-style-type: none"> • It assembles yearly how the protection policy of beneficiaries is implemented and their impact. | |
| Operational management team (DP, managers, consultants) | <ul style="list-style-type: none"> • Monitors implementation and compliance with beneficiary protection policy. • Identifies and centralizes positions that require the attention of the complementary executive leadership team. • Urgently researches and communicates details of specific houses that require resolution and proposes solutions to the Complementary Executive Leadership Team (DA) and resolves the situations identified in the current activity. • Requests feedback and validation from the YES as again as a problematic situation is found. • Provides support to staff and beneficiaries to the situation is fully resolved. • Report problem situation and progress in solving them on a monthly basis. • Plan and coordinate training and information sessions on beneficiaries' protection policy. • Check monthly how the beneficiaries' protection policy is implemented and the results and inform the DA on issues, barriers and other issues that instead the safe lead of the work for beneficiaries. • Take a proactive approach to identifying problematic situations including suspicious possible harmful behavior directed at a beneficiary, colleague, collaborator, as well as those related to the protection measures and safety of beneficiaries | |
| Program team (execution) | <ol style="list-style-type: none"> 1. It complements with the provisions of the policy of protection of beneficiaries in daily work. 2. It shall refer any problem situation as a matter of urgency and propose solutions. 3. Mediate problematic solutions as best as possible a long-term solution is found. 4. In extreme situation (112, natural disasters and any other life-threatening situation) act according to generally valid protocols. 5. Participated in its year information and training session on the protection policy of beneficiaries. 6. Monitors compliance with the protection provisions of beneficiaries by the beneficiaries. <ul style="list-style-type: none"> • Take a proactive approach to identifying problematic situations including suspicions of possible harmful behavior directed at a beneficiary, colleague, collaboration, etc., as well as those related to the protection and safety measures of the beneficiaries. | |

1. Advantages

The implementation of the beneficiary protection policy is essential for the development of good practices and successful models. The main advantages are:

1. *Children, young people and adults participating in FARA Foundation programs are treated with respect and feel safe.* The implementation of a minimum of standards and the observation of responsibility by each employee contributes to the prevention/taxation of injury risks in any form of beneficiaries.
2. *The staff employed, volunteers, partners, collaborators and any other visiting shall benefit from compliance with the minimum standards for the protection of children, young people and adults with whom they come into contact under FARA programs.* The implementation of a minimum of standards contributed to the formation of a united approach and practice in working with beneficiaries and ensuring professional conduct harmonized with the mission and principles of the FARA Foundation and aligned with the rules of professional ethics specific to each role.
1. *The credibility and reputation of the FARA Foundation is protected by the implementation and observation of a minimum of working standards with beneficiaries.* Through the consistency with which the FARA Foundation implements and complements with the standards for the protection of beneficiaries demonstrated committee and concern about the well-being of people – beneficiaries, staff, collaborators, volunteers, partners and community members.

1. Intersection between Standards and Organisation

The FARA Foundation and each person working in the interests of the beneficiaries play a key role in their protection. While Christian, spiritual and family values guide every action we take for the children, young people and adults we serve, it is very important that every member of the FARA family knows, is aware, recognizes and acts promptly to minimize any risk and problems that may endanger the safety and dignity of beneficiaries.

1. Identification of Roles and Responsibilities

Each member of the FARA team has roles and responsibilities to ensure the well-being of the beneficiaries. They say depend on the nature of the position and function which each holds as described in the individual employment contract and detailed in the job description.

In addition to the professionalism demonstrated in working with beneficiaries, prompt communication and the development/strengthening of the skills to identify the urgency and priority of crisis situations that endanger the safety of beneficiaries are of particular importance.

Section 11 of this document presents a concise description of the main roles and responsibilities organized at the hierarchic level.

1. Recruitment

The committee and concern for the protection of beneficiaries will be reflected in any announcement, interview, job description, employment contract and service contract, specifying the roles and responsibilities in this regard.

Each person's criminal record and certificate of integrity will be required to use the appoutal employment. These documents will also be requested for each service provider, volunteer and supporter as long as the work they carry out requirements directly contact with the beneficiaries. In locations where the documents submitted and the interview performance are not sufficient to make a decision for employment/collaboration/contracting services, the recruitment team reserves the right to request a list of references from which to request additional information about the candidate.

1. Code of Conduct

The FARA Foundation creates a safe and friendly environment in working with its beneficiaries by using the "gentle learning" technique set out in **Annex No. 5** and enurages and supports the development of appropriate behaviors in interaction with beneficiaries. For more details see **Annex No.1** - Code of Conduct in Working with Beneficiaries.

The FARA Foundation assumes responsibility for the continuous training of staff to develop the skills needed to work with vulnerable people so as to promote and protect their rights and to create a safe, comfortable and reliable environment for support and intervention.

5.1 Training

The FARA Foundation shall draw up an year plan for the information and training of staff on various topics and shall support individual approaches for professional development. Access to training opportunities in the protection of beneficiaries is essential to help staff engaged under the requirements, leave from the practice of other organisations and develop the skills needed for implementation.

The main topics covered by information and training session:

1. Occupational health and safety
2. Prevention of the spread of Covid 19
3. First aid
4. Hygiene
5. Relationship between staff employed and beneficiary
1. Emotional support
2. Healthy social behavior
3. GDPR
4. Photo/video terms of use

1. Media and Communication

The FARA Foundation undertakes to communicate about beneficiaries with due respect for their confidentiality, GDPR and consent to the use of photo/video for various purposes. **Annex No. 6** and **Annex No. 7** are two forms which are submitted to legal representatives and beneficiaries for obtaining consent for the use of information and photo/video for various purpose.

In all communication activities of the organization (website, conferences, project writing, public policy influence actions, fundraising, service contracting, employment, partnerships, etc.) we protect the image, privacy and dignity of beneficiaries.

In relation to the media, the communication shall take into account the best interests of the beneficiaries and their written consent, as appropriate by the legal representatives to participate in shooting stories, films documented or events in which the media is present. Materials produced by representatives of the media will be requested by the FARA Foundation expressly from the initiation phase of the collaboration with specifying the purpose for which they are created and how they will be used, including communication channels.

Any images and appearance of the beneficiaries in photo/video materials will respect the dignity of the individual, the right to a decent image reflecting his vulnerability with his consent. They will also reflect the strengths and support network that is available to beneficiaries. In locations where staff employed, volunteers, board members, collaborators, partners, supporters and dreamers take photos of personal devices in FARA Foundation actions or in personal dreams, they will be immediately informed when photographing restrictions on photo use and publication on social networks. It will be noted that non-compliance with this request is a violation of the rights of beneficiaries and the legislation in force and will be carried out in accordance with the law. Redistribution of official posts of the FARA Foundation is allowed with the assumption of everyone's responsibility for comments and reactions. The inclusion in the redistribution of beneficiaries using certain social media channels is prohibited because it leads to their identification as beneficiaries which may pose a risk to their safety and security.

Publication and dissemination of information on the contact details of residential services is prohibited for the purpose of protecting beneficiaries. For these services the contact details for the public and the media will be determined by the DA and DE.

In any circumstances mentioned above, the beneficial owner's real name will not be discussed in relation to a third person as long as he is not a professional or an institution/organization with which the FARA Foundation has a partnership to do so.

All of the above measures are intended to raise awareness of the staff employed, volunteers, collaborators, partners, dreamers about the risks and weapons in the online and community

environment to which beneficiaries may be exposed and for which we must act promptly to prevent them and protect beneficiaries.

1. Partnerships

The FARA Foundation may carry out programs and projects in partnership with other non-governmental or private sector organisations (CSRs, service providers). In all its partnerships, the FARA Foundation takes into account the best interests of the beneficiaries and the protection of its rights. To this end, partnership and collaboration agreements will include information on:

1. Ways to work with beneficiaries.
2. Minimum standards for the protection of beneficiaries
3. Exchange of information on beneficiaries including GDPR.
4. Incident reporting and resolution procedure

In the partnership phase, the key issues for which the FARA Foundation has zero tolerance will be highlighted to ensure that all collaborators, partners, and supporters understand and accept the provisions of the policy for the protection of beneficiaries.

1. Using Information Technology

The FARA Foundation promotes and supports the use of information technology and online behavior in accordance with its values and respecting the law both among beneficiaries and among partners, collaborators, volunteers and dreamers.

FARA Foundation equipment and its use, including online behavior, is monitored through IT services. Filters and blocking programs are installed to ensure that inappropriate/harmful sites, such as those with pornographic or violent content, can't be downloaded using the organization's internet connection, both by employees/volunteers and by beneficiaries who have access to the monitored equipment.

Any violation of regulations on the use, downloading or creation of images of and about beneficiaries, cyber bullying locations or online abuse will be investigated and corrected by appropriate measures.

More details about the use of information technology can be found in the Policy for the Use of Technology Equipment and Electronic Information and Communication Management (ICT Policy).

1. Visit and Leaves

In view of the protection and best interests of beneficiaries but also their right to maintain contact with family members, friends, teachers and other persons in their relationship system, the FARA Foundation provides an organized and supervised framework for visit and leave.

The stories shall be carried out in accordance with the rules laid down in the program-specific standards. They shall, as far as possible, be planned in advance taking into account the beneficiaries' program. Visitors must:

1. Observe the date and time of the planned visit.
2. To be registered in the visit register.
3. Respect the guidance of the organization's companion.
4. Treat the beneficiaries with respect and dignity.
5. Limit his interaction with the beneficiary he came to visit
6. Do not take photos or videos without the permission of the beneficiary validated by the representative of the FARA Foundation.
7. Do not use inappropriate language or behaviour.
8. Don't label.

Dreamers should be informed in advance of the rules to be followed during the visit which may or may not be supervised according to certain criteria:

1. Relationship/affiliation type
2. Duration of relationship
3. The physical and mental health status of the beneficiary
4. Comfort of the beneficiary
5. Beneficiaries' option
6. Existence of legal restrictions (e.g. capacity for discernment)
7. Exceptional national security and security measures (e.g. Covid 19)

The duration of the visit shall be agreed with the director or program manager. For more information see the program's internal standards and procedures on the visiting program and rules for visiting.

The assignment is another possibility for beneficiaries to maintain contact with family members, friends, teachers and other reference persons in their relationship system. The ticket will be given following a written request approved by the manager, program director and validated by the DA on the basis of the above criteria. The duration of the leave shall be determined by the program manager in consultation with the Programme Director and in compliance with any legislative regulations specific to each category of beneficiaries.

1. Reporting and Response to Incidents

In the FARA Foundation, incidents and inappropriate behaviors can be reported by beneficiaries, families/legal representatives, third person (relatives, opportunities, friends, visitors, students, volunteers, partners, collaborators, supporters, community members), and employees. Other ways of collecting this information may be:

1. Referral box
2. Feedback via website
1. Meetings with beneficiaries
2. Thematic surveys

The FARA Foundation has a zero tolerance policy for any attempt to cover up any event that takes place within the programs and problems life, security, dignity, physical, mental and emotional health, and the image of the credibility of beneficiaries, employees, volunteers, collaborators, partners, service providers, supporters and dreamers.

The reporting of any incident – minor or major – is done in real time, in verbal form but also in written form by filling in the appropriate form and following the procedure.

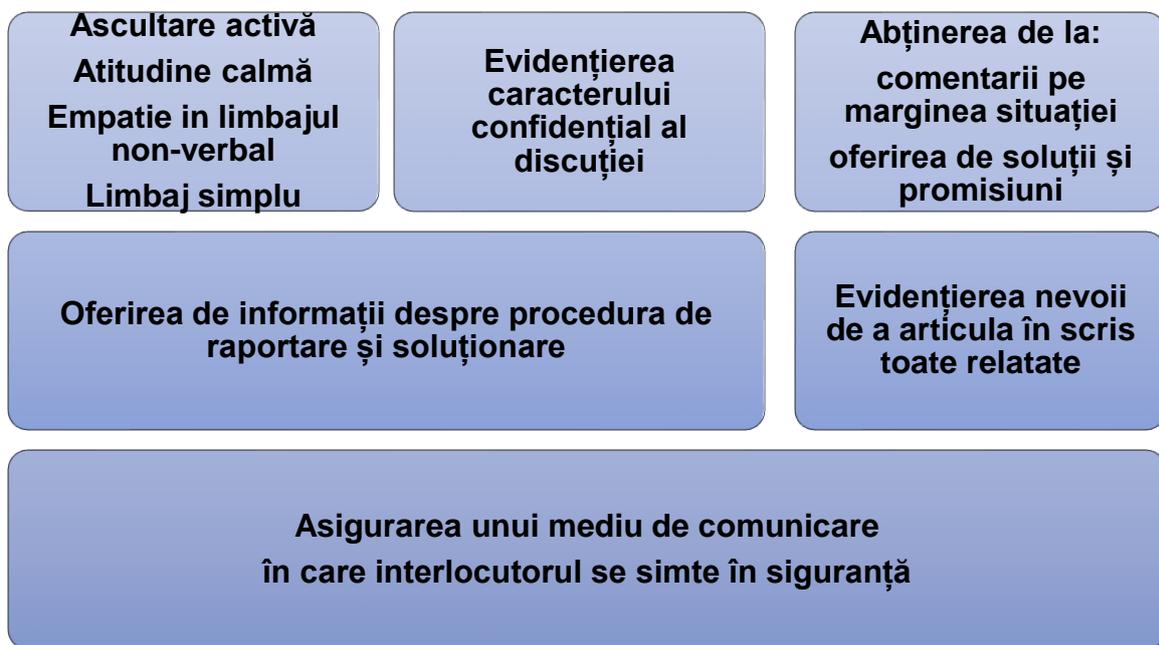
1. What are we reporting?

| Major Incidents | Minor Incidents |
|--|---|
| <p>1. Major incidents are dangerous and delicate situations involving obsessive behaviour and neglect, the consequences of which fall under civil or criminal law.</p> <p>For understanding the different forms of abuse behaviour and neglect see Section 9 – Abuse Behaviour, Annex No. 2 and Annex No.3.</p> | <p>1. Minor incidents are those situation or suspects who are not necessary fall under civil or criminal law, but are a violation of standards and good practices in relation to the protection of beneficiaries.</p> <p>For understanding the different forms of abuse behaviour and neglect see Section 9 – Abuse Behaviour, Annex No. 2 and Annex No.3.</p> |
| <p>1. Major incidents present serious harm to the individual's life, safety and security, and may also be associated with damage to the reputation, media involvement, and security and stability of the organization.</p> | <ul style="list-style-type: none"> Minor incidents do not present serious harm to individuals and do not endanger their lives. |
| <ul style="list-style-type: none"> Examples of major incidents may be: sexual abuse, molestation, physical assault and domestic violence causing injury and hospitalization, pornography, running away from home, minor marriage, sexual harassment, theft, neglect, malpractice, corporal punishment until drinking required hospitalization, human trafficking, kidnapping, labor exploitation, financial exploitation, exposure of beneficiaries to alcohol consumption and other prohibited substances, exploitation of beneficiaries through begging, fraud, | <ul style="list-style-type: none"> Examples of minor incidents may be: violation of dreams and leave rules; the rule of two adults in the presence of a beneficiary; ignoring the need for training in the protection of beneficiaries; minor assaults on the part of a beneficiary to employed person; situation required police involvement due to verbal violence, threat, alcohol consumption, etc.; minor accidents in the kitchen, sliding on the floor, medical error by mistake / inattention; suspicious of suspicious behaviour and neglect; labelling/bullying; |

| | |
|---|---|
| black work, tax evasion, etc.. | |
| <ul style="list-style-type: none"> Any form of incident considered a minor incident may be classified as a major incident if it is systematically spotted. | <ul style="list-style-type: none"> Any minor incident will be kept under observation and monitored to promptly identify if it requires reclassification as a major incident. |

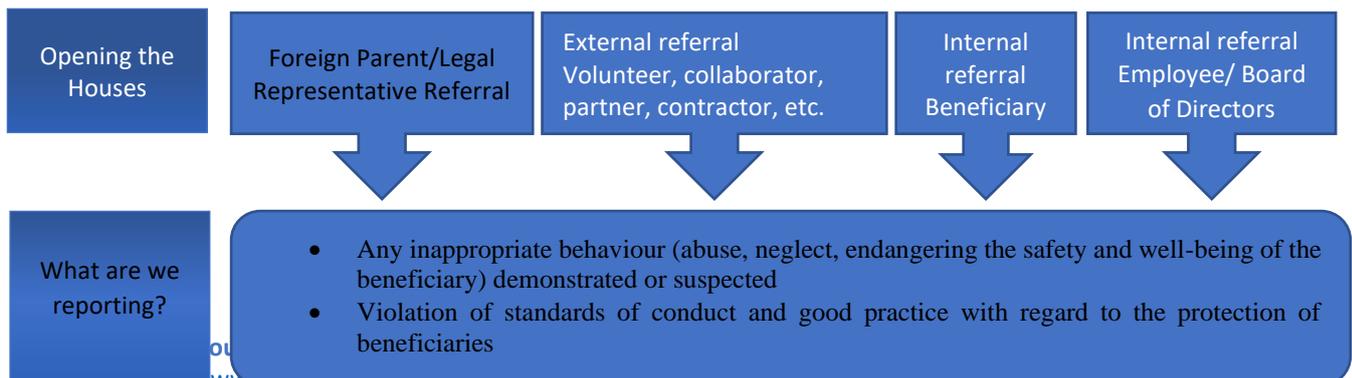
1. How do we manage?

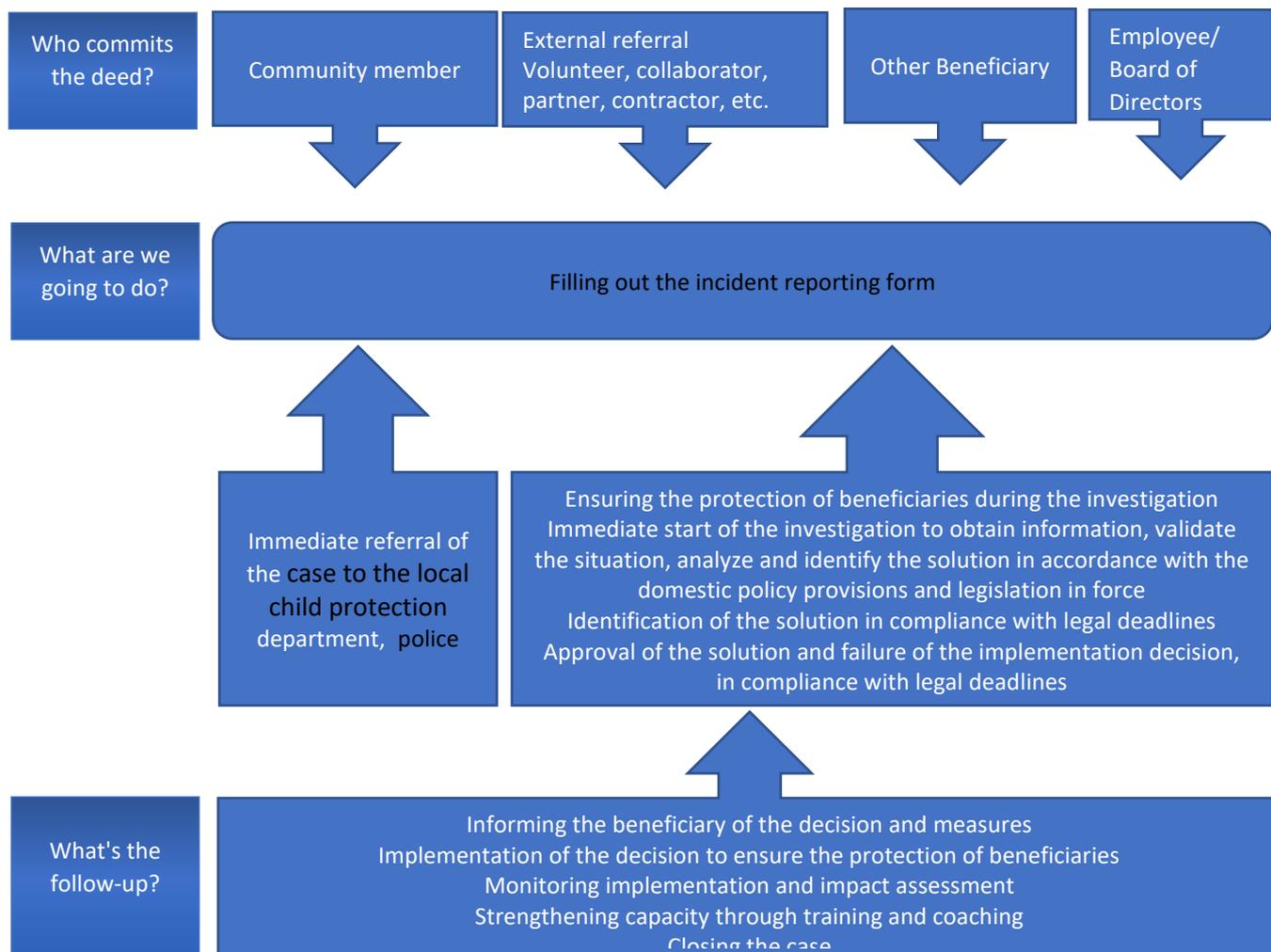
Disclosure of inadequate behaviour is an obligation for every employee, beneficiary, volunteer, collaborator, service provider, partner, and recipient. In the context of the disclosure of inappropriate behaviors, the FARA Foundation identified the following examples of good practice:



1. What are we going to do?

Regardless of how information on inappropriate behavior is received, immediately, the employee who took over/made the referral will start the reporting and resolution procedure reflected in the diagram below. All referrals shall be considered individually even if two or more referrals are received on the same inappropriate behavior.





Where a beneficiary is subject to abuse behaviour at home/other party and shows signs or bears suspicious that he has been abused or neglected, employees of the FARA Foundation must self-seize and follow the reporting and resolution procedure. Where a beneficiary is subject to inappropriate behaviour by employees, collaborators, volunteers, partners, service providers, or visitors any person (including beneficiaries) who is registered to do so, or suspects this, shall be required to communicate and alert the manager for the start of the reporting and resolution procedure. For more information on the signs and consequences of abuse see **Annex No. 3** and **Annex No. 4**.

Depending on the seriousness of the crime, the inadequate behaviour of employees towards beneficiaries is treated and resolved through disciplinary research, in accordance with the provision of the Individual Labour Contract, the Inner Order Regulation, the Organisation and Functioning Regulation, the Labour Code, and other applicable regulations (e.g. the Civil Code).

The reporting and resolution procedure will be displayed in chart format in each location of FARA Foundation programs in places with maximum connectivity.

In collaboration with the beneficiaries of the FARA Foundation, a comprehensive version will be developed, and information sessions adapted to their level of understanding will be held on a regular basis.

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