

FUNDAȚIA „FREEDOM HOUSE INC” – FILIALA BUCUREȘTI

București, Bd. Ferdinand , nr. 125, Sector 2, Tel: 0212532838

*<https://freedomhouse.ro/> *, e-mail: office@freedomhouse.ro

CHILD PROTECTION POLICY

Fundația Freedom House Inc Filiala București is fully committed to safeguarding the welfare of children participating in the activities it organizes. FHR is committed to promoting safe practices, and protecting children from all forms of harm, abuse and exploitation.

FHR staff and collaborators will work together to promote diversity, defend and respect the children's and youth's rights. FHR will consider these Policies in the preparation of all projects and activities involving children.

This document outlines FHR's commitment to protecting children.

This commitment is based on the following principles:

1. The child's best interest will be the main priority of FHR. and the activities carried out will ensure the physical, emotional, and social safety all children need.
2. All FHR representatives must behave irreproachably towards children.
3. All children, regardless of age, culture, health, sex, language, racial origin, socio-economic status, nationality, ethnicity, religious belief, and/or sexual identity, have the right to protection from all forms of harm and abuse.
4. Child protection is everyone's responsibility.
5. Children have the right to express their opinion on all matters affecting them and should be encouraged to do so.
6. FHR will partner with children and their teachers to promote children's well-being, health, and development.
7. If children with special needs benefit from our programs, we will take all necessary measures to ensure their fair inclusion in activities and their safety.
8. All child protection concerns/reports/investigations will be treated with utmost responsibility and in compliance with the law. Communication will be confidential and secure.

To implement these principles, FHR will:

1. Promote the well-being and development of children by offering them opportunities to participate in workshops, film screenings, and other educational activities.
2. Respect and promote children's rights, wishes, and feelings.
3. Ensure, through its representatives, a safe environment for children who come into contact with the Fundația.
4. Promote and implement appropriate procedures to ensure the well-being of children and to protect them from abuse (see Appendix I).
5. Train, support, and monitor staff so that Policies can be implemented to safeguard and protect children from abuse. The ethics advisor organizes information sessions, training and updating knowledge about working and interacting with children once a year.

6. Promote personnel selection policies that provide measures to prevent children's rights violations.
7. Require its employees to adopt and comply with this Child Protection Policy.
8. Respond to any allegations of misconduct or child abuse and will, where appropriate, take relevant disciplinary procedures.
9. Monitor and regularly evaluate the implementation of this Policy and these procedures. All employees will be notified annually of any revisions or updates to the Policy.

Definitions

For the use of this Policy and associated procedures, a child is anyone under 18.

Child abuse refers to any action or inaction by natural or legal persons that directly or indirectly harms children or their prospects for safe and healthy development as future adults.

The main categories of abuse are: physical abuse, emotional abuse, sexual abuse, and exploitation.

- Physical abuse involves using physical force to cause actual or probable physical injury or suffering (e.g., hitting, shaking, burning, torture).
- Emotional or psychological abuse includes humiliating and degrading treatment, such as using offensive names, constant criticism, belittling, humiliation, and isolation.
- Sexual abuse includes all forms of sexual violence, including incest, forced, and early marriage, rape, child pornography and sexual slavery. Child sexual abuse can also include indecent touching or exposure, using sexually explicit language in front of a child, and exposing children to pornographic material.
- Any sexual activity with a child, whether consenting or not, is child abuse and a crime.

This Policy applies to the following individuals:

1. To all FHR staff, employed full-time, part-time, or under fixed-term contracts, who participate in activities involving children.
2. FHR partners who come into contact with children by the nature of their activities,
3. Journalists, public figures, politicians, and others who participate in FHR activities and come into contact with children.
4. All of the above must respect this Policy in their professional and personal lives. Failure to comply may result in disciplinary action, including dismissal. For partners/contractors, the violation may lead to, including, the termination of contractual and/or partnership agreements. Where appropriate, reference will be made to the proper legal and other frameworks under national law.

The selection of FHRs staff and collaborators:

All FHR staff members are employed following a selection process, with precise requirements regarding qualifications, professional experience, and job-related activities. In accord with the Romanian law, upon employment, all FHR staff members, must present a criminal record. In addition, those involved in activities with children must present a certificate of behavioral integrity showing that they have not committed the crimes provided for in art. 1, para. (2) from Law no. 118/2019 regarding the *Automated national register regarding persons who have committed sexual crimes, exploitation of specific persons or against minors*. The same recruitment procedures and means of verification are applied to all collaborators working together with FHR in projects/activities involving children. The child protection policy and code of conduct are presented to employees and collaborators, with related obligations and responsibilities. The coordinators of the projects involving children's participation, monitor the activities of the participating staff (being FHR's employees

and/or collaborators), takes action, and alerts FHR ethics officer in case of doubts regarding the observance of the child's rights.

All FHR employees and partners must notify the responsible person within FHR of any incident/suspicion regarding the violation of this Child Protection Policy. Until the investigation is completed, employees and collaborators who are suspected of violating this Child Protection Policy are withdrawn from any activity with children.

For any notification, please get in touch with Mrs. Cristina Guseth, contact details:

- Address: **FUNDAȚIA „FREEDOM HOUSE INC” – FILIALA BUCUREȘTI** - București, Bd. Ferdinand , nr. 125, Sector 2,
- Telefon: 0212532838
- E-mail: office@freedomhouse.ro, guseth@freedomhouse.ro

Externally, any suspected child abuse should be reported to:

- Emergency service 112 (Police).
- Child Phone Association, 116 111.
- General Directorate of Social Assistance and Child Protection(DGASPC), which works in every county and in every sector of Bucharest (<https://anpd.gov.ro/web/informatii-utile/directiile-generale-de-asistenta-sociala-si-protectia-copilului/>).

Review procedure

These Policies will be reviewed regularly:

1. In accordance with the legal changes regarding child protection or following any changes appearing at the FHR level.
2. In all circumstances, at least once every three years.

Date of adoption of this Policy: 14 March 2023.

Appendix I

In the development of educational projects and activities that involve interaction with children, both FHR employees and collaborators directly engaged in the activity must comply with the following specific rules:

1) Employees and all people who work with children:

- a) Will act in good faith and treat all children equally, with dignity and respect, without any act of harassment, abuse, or neglect;
- b) Will treat children equally, regardless of age, culture, state of health, sex, language, racial origin, socio-economic status, nationality, ethnicity, religious belief, and/or sexual identity;
- c) Will encourage children to express their opinions according to their age and maturity level;
- d) Will have impeccable personal and professional behavior;
- e) Will take measures to protect children from any kind of abuse, injustice, injury, or harassment;
- f) Will ensure that, at all times, communication with children is done properly and does not constitute an invasion of their personal space or private life;
- g) Will use language appropriate to professional standards and the age of the children without humiliating or offending them;
- h) Will report to child protection authorities incidents and concerns regarding staff, activities, and programs that may harm or expose children to any risk of harm and/or abuse;
- i) Will ensure the confidentiality of personal information about children;
- j) Will obtain the consent of parents/guardians to use personal data (See Appendix 2);
- k) Will obtain the consent of parents/guardians prior to photographing, filming, or using the child's image (see Appendix 2), ensuring that photographs and/or video footage portray the child in a dignified and respectful manner;
- l) Will not hit or physically abuse children;
- m) Will not initiate and develop physical or sexual relations with the children with whom they communicate, interact, come into contact, or work; They will not have relationships with any child that could be considered exploitative or abusive, including in the online environment;
- n) Will not act in an abusive manner or that could put children at risk of abuse, including in the online environment;
- o) Will not use inappropriate language, make suggestions or give inappropriate, offensive, or abusive advice;
- p) Will not engage in inappropriate or provocative behavior from a sexual point of view;
- q) Will not invite a child to their home and will not develop a relationship with them that would be considered inappropriate according to professional standards;
- r) Will not sleep in the same room or bed with any of the children they work with;
- s) Will not spend time alone with a child, isolated from other people;
- t) Will not support, encourage the child to display behavior considered delinquent, aggressive, or not in accordance with social and legal norms;
- u) Will not act in a manner that humiliates, shames, degrades, makes children feel inferior, or that can produce any form of emotional abuse;
- v) Will not attend activities that involve the presence of children under the influence of alcohol or prohibited substances;

- w) Will not consume alcohol or smoke in the presence of children;
- x) Will not provide children with alcohol, cigarettes, or other prohibited substances;
- y) Will neither invite nor accept the invitation of children to communicate outside the purpose and context of the activity carried out within the organization.

The list is not exhaustive or exclusive. The principle is that employees or collaborators will not engage in harmful or abusive behavior or actions.

2) All employees and all persons working with children under the coordination of FHR must:

- a) Identify situations that pose risks to the child's life and development;
- b) Plan and organize their work and workplace in such a way as to reduce the risks of exposing the child to abuse;
- c) Show transparency, as much as possible, in the activities they carry out with children;
- d) Create an open and honest environment so that any issue can be brought up and debated;
- e) Ensure that subordinate or coordinating personnel have a culture of responsibility so that there is an immediate reaction to inappropriate practices or potentially abusive behaviors;
- f) Discuss with the children the relationship they have with other employees and encourage them to communicate any problems that may arise;
- g) Encourage the children - talk with them about their rights, what is acceptable and what is not, and what they can do if there is a problem;
- h) Immediately inform the coordinators of the project in which they are working if they come into direct contact with a situation that violates these specific rules of conduct in activities with children.

Appendix II

CONSENT TO PROCESS PERSONAL DATA

The undersigned,
ID-code:, holder of the ID-card,
series, no....., issued by, on the date of,
home address,
....., e-mail
....., phone, (*1)
as (whatever applicable): PARENT/LEGAL GUARDIAN (*2), of the
minor, born on
....., student in class, at school (name of school and town)
....., school phone,

I give my consent for the processing of the personal data mentioned above, as well as for the processing of the image and voice of the minor/student (in photographs and/or audio-video recordings) (*3), in accordance with the provisions of Romanian law and the provisions of the European Union Regulation no. 679/2016 on the protection of persons with regard to the processing of personal data and the free movement of such data, by the, **„FREEDOM HOUSE INC” – FILIALA BUCUREȘTI (FHR)** as operator.

I consent to my data, mentioned above, being processed for communications, including electronic ones, related to my capacity as a parent/legal guardian of the minor/student

I consent to the personal data (mentioned above) of the minor/student being processed for:

- promoting the activities organized by FHR that involve student participation;
- communication activities regarding the projects carried out by FHR that involve the student's participation.

I declare that I have been informed about the following:

- personal data will be stored for the duration of the student's participation in the projects carried out by the school in collaboration with FHR, as well as for three years after the termination of this capacity, taking into account the general limitation period and if the legislative provisions do not provide for other storage periods;
- after the end of the data processing operation, they will be deleted or destroyed, depending on the medium on which they were stored, under security conditions;
- if there is a legal obligation to archive them, the data will be archived according to the legal provisions;
- I benefit from the right of access, rectification, deletion, restriction of processing, the right to oppose the processing, the right to withdraw my consent at any time, but without this affecting the legality of the processing carried out on the basis of consent before its withdrawal, the

right not to be subject to an individual decision, the right to complain with a supervisory authority, the right to go to court.

- to exercise these rights, I can send a written request, dated and signed, to the General Director of FHR, adresa: București, Bd. Ferdinand , nr. 125, Sector 2, adresă de e-mail: office@freedomhouse.ro.

- the above-mentioned personal data may be disclosed to the following recipients (*4): the data subject, legal representatives of the data subject, operator, proxies/representatives of the operator, FHR partners, the public, public authorities (to the latter, if any a legal/regulatory obligation to do so).
- personal data will not be transferred outside the European Union.

The person responsible for the protection of personal data within FHR is Ms. Cristina GUSETH, who has the following contact details:

- Address: : București, Bd. Ferdinand , nr. 125, Sector 2
- Telefon: 0212532838
- E-mail: : office@freedomhouse.ro, guseth@freedomhouse.ro

Name and surname:

.....

Signature:

Date:

*(*1) Only the data necessary to be processed in order to achieve the purpose for which the consent was obtained will be completed;*

*(*2) The capacity of the data subject at the time of signing the consent will be specified;*

*(*3) Consent regarding the processing of the image and voice of the data subject (in photographs and/or audio-video recordings) will only be given if it is necessary to achieve the purpose for which the consent was given.*

*(*4) Only the categories of persons to whom the personal data will be disclosed, in order to fulfill the purpose for which the consent was given, will be mentioned.*