

FUNDAȚIA LEUL ALBASTRU

Blue Lion Foundation

CHILD SAFEGUARDING POLICY

Protecting every child, in every programme, every time



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I. Introduction

1.1. Purpose of the Policy

This Child Safeguarding Policy (the “Policy”) sets out the principles, rules and procedures that Fundația Leul Albastru (the “Foundation”) follows to promote and safeguard the well-being and safety of every child with whom it comes into direct or indirect contact, in the framework of its programmes, services and operations.

The Policy describes the preventive and responsive measures adopted by the Foundation so that no harm is caused to any child, regardless of gender, age, disability, ethnicity, nationality, social origin, religion or any other status, and so that any concern regarding a child's safety is identified, reported and addressed promptly and appropriately.

This Policy is adopted pursuant to, and forms an integral part of, the Foundation's Statute, and applies alongside Romanian and European Union legislation on the rights of the child, in particular Law No. 272/2004 on the Protection and Promotion of Children's Rights (republished), and the UN Convention on the Rights of the Child, ratified by Romania through Law No. 18/1990.

1.2. About the Foundation and Its Engagement with Children

Fundația Leul Albastru is a Romanian non-profit, non-patrimonial, autonomous, apolitical and non-governmental legal entity, established under Government Ordinance No. 26/2000 on Associations and Foundations. The Foundation is registered with the Register of Associations and Foundations held by the Pitești-Argeș Court, holds Tax ID 28006348, and has its registered office at Strada Valea Geamăna nr. 64, Bradu commune, Argeș County.

In accordance with Articles 14–16 of its Statute, the Foundation's purpose is to optimise, promote and stimulate lifelong learning and to carry out activities of general and community interest for the benefit of children, young people and vulnerable persons. To achieve this purpose, the Foundation's activities that bring it into direct or regular contact with children include, among others:

- organising and financing educational competitions and projects for pupils in grades I–VIII in pre-university education units, and cooperating with teaching staff;
- running a day social centre and providing social, medical-recovery and psychological support to children, young people and families in difficulty;
- establishing and operating kindergarten services and shelters/temporary accommodation for children and other vulnerable persons;
- providing counselling, socialisation support and supervision to children and young people within the Foundation's programmes;
- organising workshops, camps, socialisation and free-time activities for children and young people, as well as capacity-building and volunteer programmes involving children;
- conducting research, surveys and studies involving children on matters of education and social protection.

Any person who acts for or on behalf of the Foundation – including members of the Board of Directors, employees, volunteers, interns, collaborators, contractors and partner organisations – is bound by this Policy whenever their activity brings them into contact, directly or indirectly, with children.

1.3. Scope and Application

This Policy is mandatory for all those who work for or on behalf of the Foundation, regardless of their contractual relationship with it (paid staff, volunteers, interns, consultants or associates, collectively “Staff Members”), and for partner organisations engaged in joint activities involving children. By agreeing to work with or for the Foundation, it is implied that the terms of this Policy have been accepted as a condition of that involvement.

II. Principles that Guide the Foundation's Activities

This Policy is based upon the following principles:

- All children have equal rights to protection, dignity and respect, and to have their well-being and participation promoted, without any discrimination.
- The best interest of the child (BIC) shall be a primary consideration in all decisions and actions concerning children carried out by, or on behalf of, the Foundation.
- Any action that results, or may result, in any form of harm or abuse of a child is strictly prohibited.
- Children have the right to freely express their views, and those views must be given due weight in accordance with the child's age and maturity.
- This Policy is mandatory for everyone who works for or on behalf of the Foundation, including staff, volunteers and partners.
- Although training, advice and support will be provided, everyone must actively fulfil their individual responsibility towards safeguarding children.
- The Foundation acts within the framework of Romanian law, European Union law and international instruments regarding child protection and safeguarding.
- All reports or concerns regarding the safety of a child will be taken seriously, and appropriate steps will be taken without undue delay to protect the child and, where warranted, to act against the person(s) responsible.
- Child safeguarding is integrated into all aspects of the Foundation's work, including recruitment, programme design, management and staff conduct.

III. Definitions

For the purposes of this Policy, the following definitions apply:

Child Every human being below the age of eighteen years, in accordance with the UN Convention on the Rights of the Child and Law No. 272/2004 on the Protection and Promotion of Children's Rights.

Best Interest of the Child (BIC) A substantive right, a fundamental interpretative legal principle and a rule of procedure that must be applied in every action concerning a child, assessed on an individual basis taking into account the child's specific situation, needs and views.

Child Safeguarding The Foundation's responsibility to ensure that its staff, operations and programmes do no harm to children, do not expose children to the risk of harm, and that any concern regarding a child's safety is reported to the competent authorities. This includes both preventive actions to minimise the chances of harm occurring, and responsive actions to ensure that incidents which do occur are appropriately handled and reported.

Child Abuse Any action or omission which directly or indirectly harms a child or damages their prospect of a safe and healthy development into adulthood, including physical, sexual and emotional abuse, neglect and exploitation.

Physical Abuse The non-accidental use of physical force that deliberately or inadvertently causes a risk of, or actual, injury to a child, including hitting, shaking, burning, poisoning or otherwise causing physical harm.

Emotional Abuse Doing harm to a child's emotional, intellectual, mental or psychological development, whether as an isolated event or an ongoing pattern, including humiliation, threats, persistent criticism, isolation, ignoring or terrorising a child.

Sexual Abuse The involvement of a child in sexual activities that they do not fully comprehend and to which they cannot give informed consent, including contact and non-contact acts, exposure to sexual content, and grooming of a child in preparation for abuse.

Neglect Omissions which deprive a child of essential needs, whether physical, emotional, educational or of a legal/administrative nature.

Child Exploitation An umbrella term describing the abuse of children who are forced, tricked, coerced or trafficked into exploitative activities, including for sexual purposes or for financial or other advantage of a third party.

Staff Members Members of the Board of Directors, paid employees, volunteers, interns, consultants and associates of the Foundation.

IV. Rights of Children and General Obligations

Article 1: Promoting and safeguarding the welfare of every child is a matter of utmost concern for the Foundation and all its members and Staff Members.

Article 2: All children, regardless of age, gender, disability, ethnicity, nationality, language, religious belief, sexual orientation or other status, have the right to be protected from harm, and every Staff Member must fully respect, protect and promote their rights.

Article 3: All actions and decisions affecting a child's life within the Foundation's activities shall take into consideration the best interest of the child.

Article 4: Children shall be given the opportunity to express their views and have them given due weight in all matters affecting their participation in the Foundation's activities.

Article 5: All Staff Members who come, or may come, into contact with children shall be adequately and regularly trained in child safeguarding, in line with Section V of this Policy.

Article 6: All suspicions or allegations of abuse and/or exploitation shall be taken seriously, and a prompt response shall follow in accordance with this Policy and applicable Romanian law.

Article 7: The Foundation is committed to protecting the personal data of children in accordance with Regulation (EU) 2016/679 (GDPR) and applicable Romanian data protection legislation, as further detailed in Section VII of this Policy.

Article 8: Staff Members must avoid age-inappropriate language or behaviour, and must respect professional boundaries at all times when in contact with children, including in the operation of the day social centre, kindergarten, camps and workshops.

Article 9: Staff Members are obliged to report any concern about child abuse and/or exploitation, as soon as it comes to their attention, to their supervisor or to the Child Safeguarding Officer designated under Article 24, in accordance with Section VIII of this Policy.

Article 10: The Foundation will conduct regular monitoring to assess compliance with this Policy, covering areas such as staff and volunteer training, safe recruitment practices, reporting procedures, incident management and risk assessments, as set out in Section IX.

V. Safe Recruitment and Training of Staff, Volunteers and Partners

5.1. Recruitment Procedure

Article 11: The Foundation will only engage Staff Members deemed suitable for the respective role or activity, based on objective criteria and respecting the principles of non-discrimination and equal opportunities. Job or volunteer descriptions clearly detail the level of contact with children and the Foundation's commitment to this Policy.

Article 12: Candidates for any position or activity that involves direct or regular contact with children must submit a criminal record certificate and, where applicable under national law, evidence confirming the absence of convictions for offences against the sexual freedom and integrity of minors or other offences that would bring prejudice to children, before beginning their activity.

Article 13: At least two members of the Board of Directors or of the management team shall review candidates' applications and conduct an interview, during which the candidate's ability and attitude to work safely with children shall be assessed. References provided by the candidate may be further verified by directly contacting the referee if in doubt.

Article 14: All new Staff Members must be properly informed about, and confirm in writing their acceptance of, this Policy and any accompanying Code of Conduct before starting their activity with the Foundation.

5.2. Induction and Ongoing Training

Article 15: Every new Staff Member must attend an induction session on the Foundation's child safeguarding principles, this Policy and the relevant internal procedures before beginning any activity involving contact with children.

Article 16: All Staff Members will be given the opportunity to be regularly updated or reminded of child safeguarding policies and procedures, either formally through training sessions or informally through team meetings and discussions with supervisors, and will be informed of any changes to Romanian or European legislation on children's rights.

Article 17: A written declaration of confidentiality shall be signed by every Staff Member who has access to personal information concerning children.

5.3. Partner Organisations

Article 18: Where the Foundation cooperates with other organisations, institutions (including schools, kindergartens and leisure centres) or individuals for the implementation of activities involving children, the Foundation shall assess whether the partner's own child protection standards are aligned with this Policy, and shall request the partner's written commitment to respect equivalent child safeguarding principles before collaboration begins.

VI. Preventive Measures in Programmes and Activities

Child safeguarding must be embedded in every stage of the Foundation's programmes and activities, from design to implementation and evaluation, including the day social centre, kindergarten services, educational competitions, camps and workshops.

1. Safeguarding must be considered at every stage of a programme or project – design, implementation and closure – and risk-assessment checks must be conducted to identify areas of higher risk of harm or exploitation of children.
2. All activities designed for or involving children must be age-appropriate, safe and adequately supervised, with an appropriate ratio of adults to children.
3. A written Parental Consent Form must be obtained from a parent or legal guardian, in a language they understand, before a child participates in any activity, including camps, workshops, competitions or research activities.
4. Children have the right to freely express their views before, during and after any activity, and their consent (in a manner appropriate to their age) must also be sought wherever practicable.
5. Any service or activity providing children with access to the internet or digital devices must not expose them to risks such as online grooming or exposure to age-inappropriate content; protective filters shall be used and any relevant IT equipment shall be placed in a supervised, public area.
6. Staff Members must never be alone with a single child in circumstances that cannot be observed by others, except where strictly necessary for the provision of a service (e.g. individual counselling) and in line with applicable internal procedures.

7. Any research involving children shall respect the best interest of the child, ensure informed consent of the child and their guardian, guarantee equity and non-discrimination in the selection of participants, and use age-appropriate, ethical methods.
8. Child safeguarding policies and procedures will be subject to regular monitoring and evaluation to ensure that any issues or concerns are properly documented and that lessons learned are fed back into the design of future activities.

VII. Child Safety in Communications, Photography and Data Protection

Article 19: All personal information concerning children, including digital data such as photographs, video or audio recordings, shall be collected and processed only for the specific purposes of the Foundation's activities and in accordance with Regulation (EU) 2016/679 (GDPR) and applicable Romanian legislation. Such data shall be stored securely and shall be accessible only to Staff Members who have been given the appropriate permission and credentials.

Article 20: No image, video, or other content depicting a child shall be published, shared or disseminated (including on the Foundation's website, printed materials or social media) unless the parent, legal guardian, or person responsible for the child has given explicit, informed consent, and the purpose and use of the content has been explained to them in a language they understand. A child may refuse to take part, even where the responsible adult has consented.

Article 21: Communications and promotional materials must respect children's dignity at all times and must not include information that could be used to identify a specific child or their location, such as full name, home address or school, unless strictly necessary and duly consented to.

Article 22: Personal data concerning children shall be retained only for as long as necessary for the purpose for which it was collected and shall be securely destroyed or anonymised thereafter, in accordance with the Foundation's data retention practices.

VIII. Reporting Procedure and Complaint Mechanism

This section applies whenever a concern is raised that this Policy is not being implemented, or that a child protection incident has occurred or is suspected (i.e. where a child may be, or is at risk of being, harmed and action may be necessary to protect them). Concerns and reports may be received from any source, including Staff Members, partners, children themselves, families or community members, and must always be taken seriously.

8.1. If a Child Discloses Abuse

Article 23: Any Staff Member to whom a child discloses abuse, or who suspects abuse, must:

- react calmly and allow the child to speak freely, without interrupting;
- reassure the child that they were right to speak up and that they are not to blame;
- avoid leading questions (use “how” or “what happened next” rather than “why”), and never express judgment about the alleged perpetrator;

- explain, in age-appropriate terms, the limits of confidentiality – namely that the Foundation must pass on information where the child is at risk of harm;
- inform the child of what will happen next;
- make a full, factual written record of what was said, as soon as possible, distinguishing clearly between fact, opinion and hearsay, and transmit it without delay to the designated Child Safeguarding Officer.

8.2. Designated Contact Point

Article 24: The Foundation designates Diacenco Sabina as Child Safeguarding Officer, responsible for receiving and coordinating the response to any concern or report raised under this Policy. Concerns may be raised, in writing or verbally, at the email address fundatia@leulalbastu.ro, marked for the attention of the Child Safeguarding Officer, or directly to any member of the Board of Directors where the concern involves the Child Safeguarding Officer.

Article 25: All potential, actual or suspected concerns must be reported within 24 hours of becoming known. Where there is imminent danger to the safety of a child, the report must be made immediately, and, where necessary, emergency services (112) must be contacted without delay.

Article 26: Importance must be placed on confidentiality at every stage, both for the person reporting and for the child(ren) or adult(s) involved. Information shall be shared strictly on a need-to-know basis, as necessary to keep the child safe and to ensure appropriate assistance is given.

8.3. Handling of Concerns and Allegations

9. The Foundation is not a child protection agency and does not have the power to conduct investigations of child abuse. Staff Members must never carry out their own investigation, but must refer all evidence to the competent authorities.
10. Any case of suspected child abuse or exploitation will be reported to the competent Romanian authorities, in particular the General Directorate for Social Assistance and Child Protection (DGASPC) of the relevant county, the Romanian Police (emergency line 112), and, where relevant, the National Authority for the Protection of Children's Rights and Adoption (ANPDCA, children's telephone helpline 119).
11. Case management decisions will at all times be based on the safety of the child and their best interest. The Foundation will choose a calm, private and safe setting to discuss any disclosure, will believe what the child says, and will not attempt to investigate the child.
12. Allegations that are criminal in nature will be reported to the competent authorities in consultation with the President of the Board of Directors. Allegations that are not criminal, but involve a breach of this Policy or of the Foundation's Code of Conduct, will trigger an internal review by the Board of Directors.
13. Any person against whom an allegation has been made may be suspended from activities involving contact with children during the investigation period. Where a complaint is confirmed, outcomes may include suspension, termination of the professional or volunteer relationship, referral to the competent authorities and/or further training, proportionate to the gravity of the case.

14. Where a complaint is found to be false, unsubstantiated or unfounded, no action will be taken against the person who reported the concern in good faith. Support, monitoring and/or further training may be offered to the person against whom the unfounded allegation was made.
15. After each case, the Board of Directors will undertake a review process to identify any improvements needed in this Policy, in training, or in practice.

8.4. Content of a Report

Where practicable, a written report should include: the child's known details (name, date of birth, address, contact details); whether the person reporting is expressing their own concern or that of someone else; the nature of the allegation, including dates, times and other relevant details, with a clear distinction between fact, opinion and hearsay; a description of any visible injuries or indirect signs, such as behavioural changes; details of any witnesses; and the Foundation's immediate actions or proposals for managing the case.

IX. Monitoring, Review and Final Provisions

Article 27: All Staff Members and everyone working with or on behalf of the Foundation have a responsibility to ensure that children are safeguarded from any form of harm or abuse, and remain accountable at all times to the Foundation's beneficiaries and, in particular, to children.

Article 28: The Board of Directors will conduct regular monitoring of compliance with this Policy, covering areas such as training uptake, safe recruitment practices, reporting procedures, incident management and risk assessments, and will report on this monitoring as part of its ordinary annual activity.

Article 29: Any Staff Member found to be in breach of this Policy may face disciplinary measures, up to and including termination of their professional or volunteer relationship with the Foundation, and referral to the competent authorities where warranted.

Article 30: This Policy shall be reviewed by the Board of Directors at least every three years, and whenever a significant change occurs in the national, European or international legal framework, or in the Foundation's activities, so as to remain relevant and effective. Any amendment shall follow the same approval procedure as the adoption of this Policy.

Article 31: This Policy complements, and shall be read together with, the Statute of the Foundation and any Internal Rules of Procedure adopted by the Board of Directors.

This Child Safeguarding Policy has been reviewed and approved by:

Neacsu Marilena-Diana

President of the Board of Directors, Fundația Leul Albastru

Date: _____